

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

THE UNITED STATES OF AMERICA,
Plaintiff,

Docket No. 94CR1009MMP

Gainesville, Florida
May 22, 2000
9:00 a.m.

vs.

JOHN KNOCK and
ALBERT MADRID,

Defendants.

VOLUME 12

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

APPEARANCES:

For the Government:

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-AND-

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U.S. DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
GAINESVILLE, FLA.

Aug 15
2001 10:30 PM 2:47

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1 APPEARANCES: (Continued.)
2

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1 THE COURT: Be seated, folks. Good morning.

2 My law clerk said someone wanted to talk.

3 MR. DAVIES: Yes, sir. I did. The government would
4 offer Government Exhibit 135, which is the plea agreement of Al
5 Madrid with an pen daytimes it has been re{TKRAOEBGTD} remove
6 reference to Mr. knock. Mr. {KEPBL} {TKAOE} and Mr. Daar have
7 seen that they agree that they there aren't any problem
8 Williams the plea agreement as redirected.

9 MR. DAAR: Play I be heard that be that.

10 MR. KENNEDY: One second I don't believe Mr. Davies
11 is absolutely correct. I want the record to reflect that, that
12 does not the fact that we have brought to {TPHREUPLSD} that
13 agreement, does not of course waive your fund mental objection
14 to its add police {BL} tie thank you sir.

15 THE COURT: All right. . And I assume Mr. Daar is
16 ready to speak to that.

17 MR. DAAR:

18 Obviously at this point the court I guess to some
19 degree has conflicting deck headaches. I have received and
20 reviewed the declaration from the government attorney. And I
21 have compared it as I'm sure the court has {TORBGS} the
22 affidavit of Mr. give {SROPBLS} I would represent to the court
23 that I continue to over Mr. give availability --

24 MS. BUTLER: {KWRAF} him here absent some kneeled for
25 the court to have him here f you compare the two declear

{RAEUBGS} {T-PLS} the one thing under addressed by the Government's declaration which I know is important in the courts reasoning is the agency principal by which, Mr. Madrids attorney signed the agreement t Court brought that up apartment the first hearing. On this. Par {PARP} and in the declaration of Mr. give convince I believe that he clearly statels that he had a in else season a conditional agency from Mr. Madrid.

. And that it was his understanding that Mr. Madrids understanding that his signature would to not bind Mr. Madrid to the agreement as to the governments statement of facts.

Which I think re{PHOEFPS} any admission based on the agency since the agency was limited, and conditional.

. Obviously the government attorney cannot and has not addressed that because she was not a party to the discussions between Mr. Madrid and couple.

Par. In addition to what the has been submitted to the court it's my understand at the time Mr. give {SREUP}ls signed this agreement Mr. Madrid was still in Mexico.

Lastly, I would offer to the court, that the government attorney says that it was {WHER} understanding that give {SREUPLS} and Madrid agreed to those submitted facts. There is no affirmative statement in that that she discuss specific this will issue of Mr. give convince or this that Mr. give says said to her: I have authority to sign this. I have authority to accept this statement of facts. If Mr. give

1 veins had said such a thing to her she would have said rather
 2 than it's my understanding she would say I recall that Mr. give
 3 convince related to me that he had authority to accept those
 4 facts on behalf of Mr. Madrid.

5 . I -- I over the the court the paragraph number 4
 6 implied {PHAERL}ly that it was her understanding {-PB} and she
 7 does not give a factually basis for that understanding .

So it seems to be almost a silent understanding a
 presumption if you will. .

THE COURT: What does your hearsay is the fact actual
 basis for understanding.

MR. DAAR: Well.

THE COURT: Between him and his client. He just used
 to same word. Didn't he.

MR. DAAR: Let me that say good question let me get
 {THRFPLT} well he says I as insured Mr. Madrid prior to
 receiving authority to sign the agreement, that my signature
 would not statute an admission. That would be an affirmative
 statement {SRA*ET} ER than it was the assumed between
 Mr. Madrid and I. So I think there is un con {TRA} distributed
 affirmative statement before this court as to the limitation
 tons agency, and as to both Mr. give {SREUP}s and Mr. Madrids
 understanding that signature would not bind Mr. Madrid to that
 statement of facts. In just {HRALS}ly I reread the statement
 of facts you were. I don't believe it adds anything of {SEUG}

John Varel

1 {KHAGT} evidentiary value there is certainly evidentiary value
 2 to the fact that Mr. Madrid pled I have never add {PHEUPTD} to
 3 the admission to have plea agreement but when you read through
 4 that statement, there really isn't significant new evidence
 5 that this jury hams'nt heard in the one form or another from a
 6 hundred or so witnessls and 260 {SEUBLGTD} exhibitls it tend
 7 tons cumulative repartnership {TEUF} and a summary almost.
 8 And, hence it's evidentiary value is very limited. Un
 9 {TPOEFRPL} naturally it containls numerous statements about
 10 facts which Mr. Madrid could not possible have knowledge about.

11 . And I think it's highly pledge shall for this jury
 12 to in essence believe that Mr. a Madrid adopted those
 13 statements by the had no information about while he was in
 14 Mexico, through his attorney, in a limited agency situation. I
 15 think it's very, very {PRERPBL} shall. And I would urge the
 16 the Court to reconsider its initial feelings on the matter.

17 THE COURT: Okay thank you. Government.

18 MR. DAVIES: Your Honor, all evidence is prejudice
 19 shall. Rule 401 and 403 X {KPHRAOULD} you believe
 20 {TPAEURPBL}ly prejudicial evidence {THRFPLT} is not you believe
 21 fairly prejudicial it's prejudice shall because it's rely
 22 {SHRAPBLT} it shows the defendants guilty.

23 The evidentiary value is there because it's a
 24 statement by a party and his agent that has got value that
 25 statements of coop {PRAET}ing defendants don't have.

1 Your Honor, the written plea agreement is clear. It
 2 is signed by Al Madrids agent it's specifically signed by David
 3 give {SREUP}ls as agent for Albert Joseph Madrid an picks D a
 4 is add {TPAFRPLT} and to and {REFRPLD} in the plea agreement
 5 Mr. Madrids lawyer David give {SREUPLS} his affidavit first of
 6 all shouldn't be {KRAOEPLTD} I understand the court can
 7 consider hear in a in make {THG} but it couldn't be created un
 8 reliable hear is a say split it's in {KRAOEL} {BL} that a
 9 lawyer would sign eye play agreement with four an pen
 10 {TKAOEUBGS} and specifically sign it as limbs clientls agent
 11 and then show think that it's not show a statement of his
 12 {KHRAOEUPLT} . I can't cross Mr. give vein {-PLGS} about that
 13 his affidavit simply isn't credible also the prosecutor in
 14 Canada told me and she submitted and affidavit that she under
 15 that by signing the throw agreement Al Madrid add plight
 16 {TOULD} all to have fact innocence an pen deposition which is
 17 standing and should be the Courts understanding it say
 18 respectable under {TPORG} jury to reach.

19 Ms. were you {KER} also said she {SPWROUPBLTD}
 20 entered the plea agreement not {SRERPBLT} it fit wasn't the
 21 case that the defendant was admitting to the facts and facts
 22 she would have had the plea agreement struck.

23 And flack looking apartment those affidavits I would
 24 also point out that according to Russ he have {RER} the RCMP
 25 hams evidence that Al {PH*D} {KAEPLTD} in CAT with David give

1 veins need to {PHREBGs} {KORBGs} and David {STPWEUF}
 2 {STPWREUPBLS} never reported where wall Madrid was there is
 3 also evidence that David give convince received a large fee
 4 which may have been drug proceeds I can't cross-examination him
 5 about any of that that goes to the credibility to have
 6 affidavit also.

7 . What David give convince says in his {KHRER}
 8 {KHRAERPBLGS} {-RLS} doesn't make any since it's be played
 9 bring {TREPS} {RA} {PWRUBG} {KEUR} but {PHROERL} {POERL} it is
 10 by Al Madrid himself regardless of whether behalf {STKPWAOEULS}
 11 {STPHRAEUSDZ} his affidavit that goes to {WAOEUGTD} {THRAOPLT}
 12 should be giving to the plea agreement even assuming Florida
 13 give voice {SLS} direct it goes to the plea agreement's weight
 14 not it's add police {BL} else specially giving affidavit of
 15 Ms. were you {KER} else special {TL} giving the leaning {WAEPPG}
 16 to have plea agreement. You were the Court hams got a plea
 17 agreement which is signed by Al Madrids lawyer as Al Madrids
 18 agent those are the specific words on the signature block.

19 The question to the court is: Is it the plea
 20 agreements add miles {BL} tie. Rule of evidence 801 D 1232 B
 21 is it's 2 B 2 it is an authorized statement by a party B 2 D
 22 it's a statement by his agent three are three different rules
 23 of evidence under which this document is admissible. And the
 24 bottom line I would submit the court {WOUL} split is that the
 25 defendant cannot bar at {PHRAEURBGTD} of a statement that he is

1 responsible for by staying well I didn't mean it. He can put
2 {PWO*RT} evidence to say that he didn't mean it?

3 A.

4 He can try to cop {STRAOEUPBLS} the jury flat he
5 didn't mean it but as to add miles {BL} tie and that is the
6 question here, the plea agreement is admissible and the Court
7 should add plight the plea agreement. Door door Your Honor
8 just briefly.

9 THE COURT: Uh-huh.

10 MR. DAAR: Was generally, I would and nailed argument
11 initially I will just do you remember upon it if the court goes
12 back and looks at the actual plea agreement you will see there
13 is a sex which says Al Madrid here by a {TKPWRAOEPLS} pursuant
14 to this plea agreement. That section lists about off the top
15 of my head, 6 or 7 lettered categories. A through G.

16 Which Mr. Madrid a grease to.

17 . What is not in that sex, I don't believe; that
18 Mr. Madrid here by a {TKPWRAOEPLS} or the adoptls, the accept
19 of facts, offered by the government.

20 . And in if the cord would just look apartment that
21 and bear with me for a movement.

22 Q. You will see that section that relates to Albert Madrid
23 you were. ?

24 THE COURT: Uh-huh will you.

25 MR. DAAR: Lucy it listls all of the things that

1 Mr. Madrid a {TKPWRAOEPLS} to pursuant to that agreement.

2 . But the thing it doesn't list is that Mr. Madrid
3 here by a data the Government's statement of facts.

4 . The statement of fact social security mentioned in
5 what the government is going to {TKOFPLT} it says. F
6 government government is going present to the accept {SEPBG}
7 court the statement of facts contained in the Appendix but in
8 what Madrid is going to do it is silent.

9 . And I think if you look at the clear wording you
10 know I have to P the parol evidence rule and everything else if
11 you look at the clear wording offer this agreement no where in
12 it does it say that Mr. Madrid here by pursuant to his
13 agreement a don'tls those facts.

14 . And there is a section of what Al {PHA*} Madrid a
15 {TKPWRAOEPLS} to it is not in there you were and I think that
16 we can accept the writing of this {STRAUPLT} as {TKPWAOEULD}ing
17 us as to what the understanding of the parties was.

18 THE COURT:

19 MR. DAAR: And, Your Honor, you know admittedly they
20 do please difficulty until scrap {KOURP} but floor the court
21 you would have this defendant swear to those facts and
22 acknowledge them ton record before it would be considered an
23 admission.

24 . This is almost the {EBG} lent of what the
25 government in our country would split to probation officer as

1 their version of the facts.

2 . even on I'll negotiated plea.

3 . . .

4 THE COURT: Anything further by the government rob
5 have been just Your Honor that when we submit things to the
6 problem {PWAEUGS} they are not signed by the defense lawyer as
7 agent for defendant all of Mr. {TKARPLS} arguments {PE} he can
8 make to the jury they go to the weight of the {THEFD} evidence
9 is admissible. .

10 THE COURT: I'm going admit it it as rely directed
11 retracted version {KRAOURS} {PWROU} ton.

12 . Anything else.

13 Q.

14 MR. HANKINSON: Judge we also will be of ring -- I
15 don't think there was any legal argument about it the
16 Government Exhibit, 161, 162, and 163. Those are the items
17 {STPRAOEUPLSD} Duboc in Hong-Kong. I think at the time the
18 defense had I would {TKHAEPTD} that they hadn't had a chance to
19 look at those itemls we will be reof ring them in front of the
20 jury. We also will be of raining a series of stipulated
21 business records in front to have jury, think defense has
22 looked at them. I don't think there is anything con {TRO}
23 {SRER} {RAL} about those itemls.

24 THE COURT: What about 161, 162, 163, any further
25 objectionls. Ken {KEPBL} no I don't believe. .

1 THE COURT: Thank you . Mr. Daar.

2 MR. DAAR: No Your Honor.

3 THE COURT: Thank you. They will be received. You
4 can either put them in now or over them in front to have jury
5 whichever you wish to do {HAPB} LAN I'm over them in front of
6 the jury.

7 THE COURT: The stipulation {OFLGS} which he speak,
8 even is a {TPWRAOED} to whatever it's that he is going
9 {PROEPBL} and in {TPHR*} the business record stipulation.

10 MR. KENNEDY: That's correct.

11 MR. DAAR: Yes Your Honor.

12 THE COURT: Are you going do that individually before
13 the jury also.

14 MR. HANKINSON: Yes, sir pretty {KWAOEUBLG}.

15 THE COURT: {TKHREPB} what else do we need to do
16 before we bring the jury in.

17 MR. HANKINSON: Nothing that I'm aware of.

18 THE COURT: Anything Mr. Kennedy.

19 MR. KENNEDY: No I don't believe.

20 THE COURT: Mr. door.

21 MR. DAAR: No Your Honor.

22 THE COURT: Lets bring that jury in.

23 Jury in.

24 . . .

25 THE COURT: What number are you going put on the

1 retracted plea.

2 MR. DAVIES: 135.

3 THE COURT: Are you going over that in {TPWROPBLT} to
4 have jury so that I'll have a note of what are you doing.

5 MR. DAVIES: 135.

6 THE COURT: I'll just weight until you do it.

7 {STPHFPL} good {PHORPLG} folk, please be seated.

8 Hope you had a good weekend. Welcome back.

9 . We missed you.

10

11 Q. And the government ready to proceed.

12 MR. HANKINSON: Yes, sir Your Honor.

13 First Your Honor I would over a series of Exhibits
14 into evidence, the first evidence that I would reover into
15 evidence would be Government Exhibit 161.

16 . A and B.

17 . Government Exhibit, 162. And Government Exhibit
18 163.

19 . Those are the items previously identified by
20 Martin Richard ton the Hong-Kong police officers as itemls
21 {STPRAOEUPLSD} Mr. Duboc.

22 THE COURT: They will be received {*FPL}.

23 (Exhibit No. ## admitted.).

24 MR. HANKINSON: I would next over a series of
25 business records Your Honor that have been stipulated to

1 between the government and the defense.

2 . The -- the first time would be Government Exhibit
3 181, A and B. Which are some records of the pan Pacific hotel
4 in San Francisco.

5 . Government Exhibit 182 some additional records
6 from the pan Pacific hotel in San Francisco, Government Exhibit
7 183, a city bank Visa records a in the name of Mercedes Madrid.

8 . Government Exhibit 184, which are some first
9 Hawaii January bank records title {TKPWARPB} type escrow. 185
10 will be some American samples {SAFRPBS} bank record innocence
11 Hawaii, 186, will be some bank of Hawaii records we already
12 have in evidence -- no I'm sorry both of those will be offered,
13 A and B.

14 A which will be some record {TPHRPLS} in the name of
15 knock and B would be title {TKAOERPBS} tie EMS crew services
16 records. I would offer 189 which are American express records
17 in the name A the anytime {PHAOE} knock, B is John Knock. Next
18 would be Government Exhibit 1990, which are some national bank
19 to have red wood records in the name of Naomi knock,. This
20 would be Government Exhibit 1993. Which are so no {PHA} title
21 guarantee records relating to a house at 7565 so no {PHA}
22 highway highway.

23 . 1 -- I would also over Government Exhibit 194 B,
24 which are some records of the purchase of the house at {KA}
25 {HA} Louisiana Avenue.

1 . I would offer 197, which are some records from the
2 {PHOPB} in a Louisiana in a bay hotel on the island of Hawaii.
3 180 which are some record {TPRPLS} the hotel bell air in loss
4 {APG} last. And Government Exhibit 225, which are some records
5 of the {PHUP} {TAEUPB} house in Aspen Colorado.

6 . And, I believe there was a stipulation as to
7 Government Exhibit 195 but it has already been {TPHRAOEPLSD}
8 evidence. So those are the matters we would be of ring
9 pursuant to stipulation Your Honor.

10 THE COURT: Pursuant to stipulation.

11 (Exhibit No. ## admitted.).

12 THE COURT: Call your witness.

13 MR. HANKINSON: We would call Mike Lee back to the
14 stand.

15 MR. DAVIES: Can we just have a second Your Honor.

16 THE COURT: Surely. .

17 THE COURT: You are still under oath sir.

18 THE WITNESS: Yes, sir court.

19 DIRECT EXAMINATION.

20 MR. DAVIES:

21 Q. Your Honor I would offer Government Exhibit 135 which is
22 a copy of Al Madrids plea agreement with the government of
23 Canada. ?

24 THE COURT: It will be received subject to the prior
25 rulings.

DIRECT EXAMINATION.

MR. DAVIES:

(Exhibit No. ## admitted.).

DIRECT EXAMINATION.

MR. DAVIES:

Q. Your Honor I would request to publish a portion of Government Exhibit 135.

THE COURT: You may do so.

Q. Agent Lee, I've given the jury four pages of the plea agreement. If you would go to the statement of facts part.

A. Yes.

Q. And starting with paragraph 16, which is at the bottom of the first page.

A. You said number 16?

Q. Paragraph 16, which says following Mr. Madrid's arrest.

A. Yes, sir.

Q. If you would just start publishing -- reading the plea agreement there and let the jury follow along with you.

A. Yes, sir.

A. Following Mr. Madrid's arrest on July 16th, 1992, his rental vehicle was searched and a ring notebook containing several pages of the notations and mathematical calculations was seized.

Certain of the notations refer to Sheelhead being the Courtney property. Mr. Cowles had a similar ledger that

1 covered only a small portion of the shipment whereas
2 Mr. Madrid's were exhaustive and accounted for the movement of
3 the drugs from July 3rd 1992 to the date of his arrest.

4 These calculations were detailed and consistent with
5 the calculations normally found in the possession of persons
6 involved in the drug trade.

7 Mr. Duboc advised that as an offload contractor
8 Mr. Burdin had been paid between 22 percent to 25 percent of
9 the profits made from the importation, either in cash or
10 hashish.

11 Mr. Duboc had by the time of the arrest received a
12 majority of the money from the 15 tons that had been
13 distributed prior to the arrest on July 16th, 1992.

14 He described the arrest in Vancouver as being a
15 severe set back for the business because the usual distribution
16 scheme was suspected of being compromised by the arrest. The
17 remaining hashish was transported to Quebec by associates of
18 Mr. Burdin.

19 Mr. Madrid contacted Mr. Duboc and advised him that
20 the rest of the load was safe and in the hands of Mr. Burdin's
21 associates who had transferred the hashish to Quebec by means
22 of rented vehicles. The organization was repaid about 15 of
23 the 20 tons. Following the arrest in 1992, the RCMP Vancouver
24 drug section commenced an investigation into the activities of
25 Mr. Burdin and others. During that time, surveillance was

1 conducted and Mr. Madrid continued to
2 company of Mr. Madrid
3

1 conducted and Mr. Madrid continued to be observed in the
2 company of Mr. Burdin.

3 In late 1992 Marshall Way was hired by the
4 organization to receive the collection of money from the oh,
5 into too or Toronto into Toronto, excuse me.

6 In late January of 1993, he moved to Vancouver to
7 continue with the transshipment of funds to Singapore and met
8 with Mr. Madrid who had {SPHRAOEUPLSD} way of his role am and
9 responsibilities and asked him what he required to get the job
10 done.

11 During conversation Mr. Madrid advised Way that he
12 would be getting a helper and another meeting was set for a few
13 days hence.

14 The second meeting between Mr. Madrid and Mr. Way
15 took place at the same office where Mr. Way was introduced to
16 Julie Roberts who was identified by Mr. Madrid as {KA} fly fell
17 go {TAOR} Ms. {ROG} {TKPWOERPBD} {STROUPLTD} a {STKPWAOEUR} a
18 amount and facts ands machine had a set of keys for the
19 apartment and received messages and intermittantly Mr.
20 Mr. Duboc.

21 At a third meeting with Mr. Madrid, Mr. Way was told
22 how the money pick-ups would be handled. Mr. Cowles was
23 present in the office but did not participate in the meeting.

24 Further, to Mr. Madrid's instructions, Mr. Way met a
25 woman in the Oakridge Mall, received a set of keys for a

1 vehicle which had a large quantity of money in the trunk. As
2 instructed, he drove to Ms. Roberts apartment, unloaded bags of
3 money and returned the car and the bags to the mall parking
4 lot.

5 Mr. Way advised that he had made approximately four
6 or five pickups between January and June of 1993 totaling about
7 ten million. That is in U.S. dollars. The money had been
8 counted and bundled by the time he received it. Upon
9 notification that money couriers had arrived in Vancouver, he
10 prepared the money for transshipment to Singapore.

11 During this period of time, Mr. Way and Ms. Roberts
12 were closely monitored by Mr. Madrid. The business was
13 concluded in early summer of 1993, and Ms. Roberts and Way who
14 were paid by Mr. Madrid, returned to the US.

15 In late 1993 the business took a downturn. Ms. Vacca
16 was arrested in the U.S. on charges of conspiracy to import
17 drugs into North America. She provided evidence which led to
18 the arrest of Mr. Duboc in Hong-Kong in early 1994 on the same
19 charges, and to the arrest of Matthew Martenyi in San
20 Francisco.

21 Mr. Duboc, facing a lengthy period of incarceration
22 in Florida, divested himself of approximately 130 million in
23 cash, and assets in favor of the U.S. government and provided
24 information which lead the RCMP to commence an investigation
25 into Mr. Burdin with respect to accepts acquired by him in the

1 1992 offload {KRAOR} **.

2 On May 17th, 1994, warrants authorizing the search of
3 the Courtney property, the Gibsons property, and the Quallicom
4 property were obtained and executed. The following relevant
5 information was obtained. A, the Gibsons property seemed to
6 have been more recently occupied than the other two residences
7 a discarded she's {PRUPBLS} {TPWAOET}ly dated January 5th,
8 1990, prescribed too Al Madrid was located.

9 B. Fingerprints were lifted at all three properties
10 by members of the RCMP identification section and were
11 examined. Mr. Cowles fingerprints were found at a Quallicom
12 property, and Mr. Madrid's fingerprints were found at both the
13 Quallicom and Gibsons property.

14 C. Rollers of the type used to move heavy objects
15 radio surveillance and night vision equipment were located on
16 the Courtney residence.

17 Q. Let me stop you there. If you would skip to the next
18 page and also publish paragraph 35, please.

19 A. Only paragraph 35?

20 Q. Yes.

21 A. RCMP surveillance in the summer of 1994 following
22 execution of the search warrants {PHROPB} Burdin and the some
23 of his {PRAO} insteadls property demonstrates that Mr. Madrid
24 continued to be involved with Mr. Burdin.

25 MR. DAVIES: Thank you.

1 Q. The jury was following along with those four pages that
2 you were reading from. But, if you would turn to your first
3 page, the first page of the plea agreement.

4 A. Yes, sir.

5 Q. Which the jury does not have.

6 A. Yes, sir.

7 Q. Does the first page indicate that it is a plea agreement
8 of Albert Joseph Madrid?

9 A. Yes, sir, it does.

10 Q. Does it reference a statement of facts appended as
11 Appendix A?

12 A. Yes.

13 Q. Was that what you were just reading from?

14 On the first that is in evidence, which the jury also
15 does not have.

16 A. Yes, sir.

17 Q. Is there there a signature by Mr. Madrid's attorney,
18 David Givins?

19 A. Yes, sir, there is.

20 Q. And it's signed David Givons, agent for Albert Joseph
21 Madrid?

22 A. That's correct.

23 MR. DAVIES: Thank you.

24 Q. Agent Lee, have you reviewed and prepared summaries for a
25 number of documents and that are in evidence in this case?

1 A. Yes, sir.

2 Q. Specifically, have you reviewed and analyzed Government
3 Exhibit 194A which are the Title Guarantee Escrow, Inc. records
4 regarding the {KWAOEUE} key Ranch property?

5 A. The guy key Ranch property, yes, sir.

6 Q. Is that the property that the Realtor, James Daubert
7 testified about?

8 A. Yes, sir.

9 Q. And have you also reviewed government Exhibit 184, the
10 first Hawaii Bank Title Guarantee escrow service records?

11 A. Yes, sir, I have.

12 Q. And have you prepared a summary chart that will help you
13 summarize those records?

14 A. Yes, sir.

15 THE COURT: Let me talk to the jury a minute about
16 summaries.

17 Ladies and gentlemen, our Rules of Evidence provide
18 that when EXHIBITS are received in evidence, and they tend to
19 be voluminous, that an individual known as a summary witness
20 can testify and explain to you and present to you the content
21 of those records which are already in evidence.

22 This summary is only to assist you. To the extent,
23 if any, that the summary is not truly -- does not truly
24 represent what the records themselves portray, to that extent
25 you should ignore the summary. You should always rely on the

1 underlying records which are the best evidence of course of
2 their content.

3 So, as I understand, Mr. Lee, is now going to do
4 summary testimony?

5 MR. DAVIES: Yes, sir.

6 THE COURT: All right.

7 Q. With regard to the records I just discussed 194A, the
8 title Guaranty, Inc. records regarding Waikaki Ranch, and 184,
9 the First Hawaii Bank records, did you prepare Government
10 Exhibit 238, which is a summary of those records?

11 A. Yes, sir, I did.

12 MR. DAVIES: Your Honor, I would offer Government
13 Exhibit 238 into evidence.

14 THE COURT: It will be received.

15 (Government Exhibit No. 238 admitted.)

16 MR. DAVIES: May the witness stand down?

17 THE COURT: Uh-huh.

18 Q. Now, if you would go ahead and explain your summary to
19 the jury.

20 A. Yes, sir. On December 1st, 1992, \$30,000 was transferred
21 from Credit Lyonnaise in Luxembourg, which is a bank in
22 Luxembourg from the account of Jacarda Petro Chemical. The
23 money transfer was to Title Guarantee Services at this account
24 number at the First Hawaiian Bank in Hawaii. That actually is
25 the account number of Title Guarantee Escrow Services at the

1 first Hawaiian Bank at that location.

2 The \$30,000 was transferred into three separate
3 escrow accounts at the bank. And those are the escrow numbers
4 right there. The records reflect that Title Guarantee was
5 acting as the agent for John Knock on each of those deposits.

6 MR. DAVIES: Scroll up one.

7 A. On December 17th, 1992, \$577,214 was transferred from the
8 earn banking corporation, and the remitter was Caltax P.A.
9 spell {P*ET} dredge money was transferred directly into the
10 account of Title Guarantee Escrow Services in {THRAPLS} officer
11 {TREPLSD} purchase of those three lots. Which was lots --
12 which were lots 71, 89 and 116. The total transferred were
13 \$617,214.

14 Q. Agent Lee, let me show you what I've marked for
15 identification as Government Exhibit 200 A and B. Can you
16 identify those?

17 A. Yes, sir. Those are bank records that I obtained from
18 Credit Lyonnaise in Luxembourg.

19 Q. What is Credit Lyonnaise?

20 A. It's a bank in Luxembourg City, Luxembourg.

21 Q. And are they relating to a specific account?

22 A. Yes, sir, they are.

23 Q. What account are are they relating to?

24 A. The account of Jakarta Petro Chemical.

25 MR. DAVIES: I would offer 200A and B into evidence.

1 THE COURT: They will be received.

2 (Government Exhibits 200A and B received.)

3 THE COURT: Thank you.

4 THE WITNESS: Yes, sir.

5 Q. Agent Lee, on your summary you just did regarding the
6 Waikaiki Ranch property, you referred to some of the money came
7 from Caltek Petroleum; is that correct?

8 A. Yes, sir, that is correct.

9 Q. Can you summarize if those records in front of you, 200A
10 and B the Jakarta Petroleum at Credit Lyonnaise, can you
11 summarize if they have got any significance with regard to
12 Caltex Petroleum?

13 A. Yes, sir, they do. In December of 1989, two large
14 deposits were made into this account from a Caltex Petroleum
15 December 2 -- I believe it was within two days of each other
16 for a total of four million, two hundred sixty-nine thousand
17 dollars.

18 Q. Did any of the money at the Jakarta Petroleum at CZredit
19 Lyonnaise go through through a United States bank before going
20 overseas?

21 A. Yes, sir. All of the US clears deposits into this
22 account went through a corresponding bank in the United States
23 before traveling to Luxembourg.

24 Q. And do you have in front of you Government Exhibit 200C?

25 A. Yes, sir, I do.

1 Q. Is that a summary of significant deposits and withdrawals
2 that were made with regard to the Jakarta Petroleum account at
3 Credit Lyonnaise?

4 A. Yes, sir, they are.

5 MR. DAVIES: Your Honor, I would offer Government
6 Exhibit 200C into evidence.

7 THE COURT: It will be received.

8 (Government Exhibit 200C admitted.)

9 Q. And before you go through your summary, Agent Lee, can
10 you explain to the jury how this account was opened at the
11 Jakarta Petroleum at Credit Lyonnaise in Luxembourg?

12 A. Yes, sir. The Jakarta Petroleum was opened under the
13 name of -- the corporation rather, I should say, was identified
14 as {SPOEPBLT} with Anthony Larkin. Anthony Larkin is an AKA
15 pseudonym for Claude Duboc. He produced a false irish passport
16 in May of 1988 in that name to open this account as a signatory
17 for this account.

18 Q. Were there any references to {POS} {KAOS} tall offshore
19 with regard to opening this account?

20 A. Yes, sir. This was opened by CII offshore petroleum **
21 which is this company right up here. This was another bank
22 account that Claude Duboc had in Luxembourg.

23 Q. Let me -- before we go through this summary. If I refer
24 you back to Exhibit 136 which were the mail room records.

25 A. Yes, sir.

1 Q. The Patrick Osborne mail room records. Did they make
2 reference to a coastal offshore oil services also?

3 A. Yes, sir, it did. It was Patrick Osborne. John Knock
4 opened a mail room record using -- referencing a company named
5 Coastal Offshore Oil.

6 Q. If you would, explain what the jury is looking at now
7 which is your chart 200C.

8 A. Yes, sir. Those are the lists of several significant
9 deposits that were made into this Jakarta account starting on
10 May 17th, 1988 when the account was opened until it was closed
11 on May 3rd, 1994. The first large deposit was made in May of
12 1988 for a total of five million dollars from the crowd
13 Petroleum account in Luxembourg. That money went through a
14 corresponding U.S. bank because it's in us {THRAR} {TPHAOPLS}
15 this Luxembourg I can't Jakarta account.

16 The next large deposits were between September and
17 November of 1988. They came from Minute Master International,
18 went through Credit Lyonnaise branch in New York before
19 traveling to Luxembourg. The total amount was 4.1 million US
20 dollars.

21 Also in 1998, a little bit reversed here, but June
22 and September of 1988, six hundred seventy-five thousand
23 dollars went to the Citibank branches in Buffalo, New York from
24 originating from those accounts in Jakarta Petro account in
25 Luxembourg.

1 Q. October of 1989, three million dollars with {RET} me
 2 {TPHER} being {WAPBG} Petro chemical came into the {SKWR*EBG}
 3 penitentiary chemical account, again, going through a U.S. bank
 4 in New York, traveling to Luxembourg.

5 December of 1989, 4.2 million dollars that we reside
 6 early {KWRAOERL} from {KHAL} {TR*EBGS} penitentiary help
 7 generally going a U.S. bank in New York traveled through
 8 Jakarta penitentiary dredge chemical account in Luxembourg.
 9 Scroll {TKO*EUPB} {A*U} bit.

10
 11 A. In February of 1991, 285 million {SKWRAP} necessary
 12 {KWREPB}, from oh, man oil as resubmit {TEUR} {KPAEPL} into
 13 this account onto the Jakarta account in Luxembourg. In April
 14 of 1992, 900 though dollarsls {ULSZ} from a barb {TP*PBLs}
 15 service unless than {PHARPB} BA ruin in the next series of 60
 16 deposit {TPRPLS} April of '92 through January of 1993 with 9
 17 hundred thousand {ULSZ} 3 hundred two thousand 52 8,000
 18 {TKWRAOUPLS} 585 thousand understand call from a {TPRA} arrived
 19 {PWAEURPB} familiar services which is in non{PHAR} P.A.
 20 {RAOEUPBL} now again all four of those {TK*EPLS} peoplesls
 21 traveled through corresponding bank in the New York. To go to
 22 lucks {PWOERPG}.

23 Q. To to to tool tall us {TKELS} {PO*EPLS}ls just {ULSZ}
 24 {TKPHRAR}ls alone in this account from 1988 to 1994 was 29
 25 million, 826 thousand dollars. The total foreign deposit we

1 all with which are not are not {REFRPLSD} {AO} on here this
 2 being the largest came from in {ULSZ} dollars today would e
 3 {KWADEL} 4.million dollars. For eye total deposit no, sir
 4 todays 34 million, 5 '94 dollars and cleaning?

5 Q. Did you also summaries with {TKRARLS} from that account?

6 A. Yes.

7 A. We his {TEUD} several significant withdrawals and
 8 paymentls in this from this account. Again, starting from may
 9 of 1988 {TOEUL} when it was closed in 1994. The first
 10 significant one was July 29th, 1988 was 147 though, Canadian
 11 dollars going {RO} {KPWRAL} bank of Canada this particular
 12 de{P*EUS} was used to purchase the property on Ranch road in
 13 Gibsons {PREUT} tissue Columbia that was {SKWRAOULSD} as a
 14 stamp house for there {ORG} nil {SAEUGS} again that 8180 was
 15 16, -- excuse me 164, to J.J. {RAOEU} and also 2 6,500 {KA}
 16 {TPHRAPLD} to again these two {ABG} {KPHROUPBLT}s represent to
 17 the punch of that rot on Ranch road {TKPWEUB} S-O-Bls British
 18 Columbia ** on {TPHROFR} 4th, 1988, there was a one million
 19 {ULSZ} deposit from Jakarta penitentiary {TRO} chemical onto
 20 the Patrick Conlan foundation again that credit link nice bank
 21 in lucks {PWOUGS} there money traveled from Jakarta through the
 22 correspondencels US bank {BGTS} onto the Patrick Conlan
 23 foundation account. As {HREFPLGSD} by Julie Roberts.

24 . And, on March 2nd, 1989 a series of {PWER} rear
 25 checks, which basically means they are just oh, -- you got them

1 you got the money, for a total of 4.4 million dollars came out
2 of that account.

3 . In January of 90 through may of 791, buy {KPHREPL}
4 farm {PHRA} {WHREUFLS} a stock which excuse me which is a
5 company, in can {TKARBGS} 2.6 million dollars Canadian was used
6 to purchase stock from this account. From buy {KPHREPL} Farina
7 {PHA}.

8 . -- December 23rd 1991 \$5,000 US was transferred to
9 mountain house this is where Claude Duboc would stay when held
10 go {SKEUPG} in the United states and Colorado.

11 . December of 791 through accept {TWER} of 1992.
12 {PAFR} 47 thousand, though dollars and a {STERLS} of as the
13 {TPRAERLS} {TP-R} to {KA} {AO} ruin to {TKPWAR} or the was the
14 Al {TKWRALS} used by Julie Roberts. During this time period.
15 There is several smaller checkls made out to coastal offshore
16 oil. Which is referenced here on this account with this being
17 the {SAOEUPBLG} {HRAR} against one this occurred on February
18 7th, 1992. For 60 though us to coastal a offshore again this
19 was the company {TPHREFRPLSD} the mail room record innocence
20 Canada by John knock. On December 1st, {179D#} '92, this is
21 the 30,000 deposit, 30 thousand dollars withdrawal I {SAOULD}
22 say that was the {TKET} Ted no Title Guarantee which is Title
23 Guarantee in Hawaii for the purchase of John knockls property
24 ton week key {RAEUFRPB} for those three lots this was the down
25 payment right here.

1 Q. That was the money you {TPHREFRPBLSZ} the summary you
2 did a few minutes ago?

3 A. Yes, sir.

4 A. Those two withdrawals right lower an July {14*79#}, 93 of
5 50,000 {TPRAOEFRPB} frank, J you can and {SHRAOUP} {KHUPB}
6 these are companies Hong-Kong she'll companies that Claude
7 Duboc used to billed humans how skills in France and to
8 maintain his properties in France.

9 . And, on -- this date right here actually {SL}
10 incorrect. I believe it was may of 1994 DEA the {R*ETS} to
11 have money in the account was forfeited the government 3 toy 2
12 million dollars was traps {TPAOERLD} to the United States but
13 that was that date is incorrect that was actual until 1994.

14 .

15 Q. You can have a seat again please, sir.

16 .

17 Q. Agent Lee when you first started summariesls we talk
18 {ABGD} week key Ranch {WHREUFLS} included a bit in the summary
19 I just did?

20 A. Yes, sir.

21 Q. Have you also reviewed government exhibit 166 which are
22 the A Mr. S record {TPRPLS} Congress Congress?

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

24 Q. Those are the record {THAPLS} {T-PT} three Hong-Kong
25 officers testified about?

1 A. Yes, sir.

2 Q. Are there any records in the a.m. S records that pertain
3 to week key Ranch?

4 A. Yes, sir. The records relate {TOLGS} clue {KHAOEU}
5 {KHOPBG} company. At A Mr. S was used when John knock traps
6 {TPEFRPBLD} {AO*EUP} from his name into that or or the part
7 {TPHAEPLT} nor foams lightls open week key Ranch.

8 A. The original deeds set {RET} {RA} are in in the account.

9

10 Q. Let me show you what I've marked for identification as
11 government Exhibit, 202 A .?

12 . and B. Can you identify those. Please.

13 A. Yes, sir. Those are letter {ROEG} to free of the
14 government of {PWOR} ruin to the us cuss Tom unless 1993.

15 Q. And do they regard an account of air {TP*PBLs} services?

16 A. Yes, sir they do.

17 Q. Your Honor I would offer Government Exhibit, 200 A and B
18 into evidence.

19

20 THE COURT: It will be received.

21 (Exhibit No. ## admitted.).

22 Q. And agent Lee have you also in addition to reviewing
23 those record {SRUPLS} reviewed the mid state bank records
24 recording the {PHAR} signal {RO*PT} man {TWOPLT} which are in
25 evidence as government Exhibit 191 A?

1 A.

2 Yes, sir.

3 Q. And have you prepared a summary that will help you sum
4 miles the mid statute bank and the air financial records?

5 A. Yes, sir.

6 Q. And is -- is that Government Exhibit 1912 C.

7 A. It's.

8 MR. DAVIES: Your Honor I would offer Government
9 Exhibit 191 C into evidence. .

10 THE COURT: It will be received.

11 .

12 MR. DAVIES: Play the witness stand down.

13 THE COURT: Uh-huh.

14 MR. DAVIES: 191 C.

15 .

16 Q. To be clear for the record agent Lee I'm showing U.S.
17 this Government Exhibit 202 B which Clyde {T-PLS} rest to have
18 air final service record {TPHRPLS} bay ran?

19 A. Yes, sir those relate to documents obtained by the the
20 government of Canada in their investigation.

21 Q. If you would go ahead and explain your summary please?

22 A. Yes, sir. This is Marshall Rothmans account apartment at
23 mid state bank. In California in 1990 .

24 On March 7th, 1990, first deposit was made into that
25 account the bar ruin records show understand that money was

1 transferred the at the request of R C blue star. Which is --
 2 ass a as corporal level her in Canada testified about was used
 3 to launder the drug pro seedls of the organization.

4 The money was ordered to be transferred by them was 3
 5 hundred thousand us. They -- the R K blue star told air final
 6 services that the memory rely {PHREPL} {TKER} was {TKWOFPL}
 7 {TKPWOFPPLT} {TPHAPLT} was to believe paid in favor of {RO*T}
 8 investmentls. On March 7th the traps physician US was actually
 9 done. Arrived rain {TPA*PBL} service unless where rain sent
 10 the money to it corresponding bank at arrived rash banking
 11 corporation in New York.

12 . That money was then immediately transferred into
 13 Marshall Rothmans account Rothman investments in is an limbs
 14 {WAOEUPLS} oh, boys is on March 7th.

15 A. On April 12 {*D} another deposit via teletype of 300,000
 16 was sent this time the government of BA ruin did not have a
 17 record of this particular originator except that it was done.

18 . The tell type was on behalf of Gulf development
 19 again the same as the previous one. On April 12th, 1990 it
 20 went through arrived {RAOB} financial service unless {PWEUP}
 21 {RAOEUPBL} again through the {KOR} {-R}ing us {PWAP} income New
 22 York, and then on to marshal {RO*T} mapls account in at Rothman
 23 {TKPWAOPBLTS} physicals generally 300,000 dollars
 24 {STKPWHRFPLT}.

25 A. On October 3rd, again, we have another depest. Into

1 Mr. most manls account there the one was originated on October
2 {27D#}, 1990 again a Singapore teletype came from R K blue
3 star. Requesting that arrived ran financial services send 250
4 though dollars {ULSZ} to Mr. Rothman.

5 . Again it was on behalf of the company quote Gulf
6 development {THRABLD} {WP} {WP} was just reference Mr. {RO*T}
7 plans name itself on October 3rd, 1990 again arrived {RAB}
8 financial services offer P.A. ruin sent the money to its {KAOR}
9 {-R}ing bank in New York into Mr. {RO*PT}sls man continue in
10 {SAPBL} {TA} {RO} {KA} California 250 thousand dollars.

11 A. And this again is a summary of everything I just said.
12 All three depositls March 7th, 1990, April 12th, 1990 and
13 October {278D#}, 19903 hundred thousand, 3 hundred through 250
14 thousand for a to {TOEL} of 850 thousand went through a barb
15 financial service unless bar ruin again to the corresponding
16 bank in New York.

17 . then, on April 21st, 1992, as Mr. {RO*T} plan
18 testified, he received an additional depest to extend the --
19 option on this particular purchase. Of 160 thousand dollars.
20 The grant total of money that came from Singapore onto the
21 United States from Rothman investmentls was 1.1 million
22 dollars.

23 Q. And, this summary represent relates to the testimony of
24 Marshall Rothman that is the investments were options that he
25 got from Mr. Knock?

1 A. Yes, sir it does.

2 Q. In Government Exhibit 202 A the record from air {PWAEUP}
3 are there any records represent {TOLG} John burn?

4 A. Yes, sir, there are.

5 Q. If you would tell jury what that relatels to?

6 A. Oh,.

7 A. On one to have {KPO} teens to have wire transferls, there
8 were -- bear with me one second.

9 : The government of BA ruin obtained the original
10 still type from R K blue star. To arrived {RAB} final
11 services. That reference is 25 though dollar de{PO*ELS} on
12 October 2nd, 1990. The transaction that was or {TK-RD} by R.D.
13 blue star just an above that was for 3 hundred though dollars
14 {ULSZ}, to be transferred into the bank A Florida natural
15 de{P-R} trails in Singapore. And it sites account {TPHRUPBL}
16 5041128-01 {TPAF} ring John burn John burden of proof is if
17 alias of Albert Madrid.

18 Q. Agent Lee have you also rereceived Government Exhibit 192
19 A which is west America bank records?

20 A. Yes, sir.

21 Q. And did you prepare a summary that will help you explain
22 those records Government Exhibit 192 C?

23 A. Yes, sir.

24 MR. DAVIES: Your Honor I would offer Government
25 Exhibit 192 C into evidence.

1 THE COURT: Yes, sir.

2 (Exhibit No. ## admitted.)'

3 Q. Publish 192 C.

4
5 A. Those three deposits reference the rocky crack
6 development deposit {THPLS} was the second development that
7 marshal Rothman testified to in by the he received money
8 {TPHRPLS} John knock. The on November 18th, 1993, \$500,000 was
9 wire transferred, through the American express bank all right
10 {TPHAOD} the are key crack development account amount west
11 America bank which was Mr. Rothman's account that he made for
12 there development.

13 On November 26th, of 1993, generally, deposit from
14 the American express bank limited of 650 thousand {ULSZ} dollars,
15 went into this account same account. And generally, only
16 {TPHOFR} 29th, of 1993, 350 thousand dollars from the American
17 {BG} press bank although {-TD} was deposited into this rocky
18 crack development account for a total of 1 and a half million
19 dollars us.

20 Q. So so to {SAOUPL} pry when Mr. Knock was Mark {BG}
21 {TKWAOEPLT} money was coming from the age other places a
22 {PRAOEUPB} financial and west American {BG} bank?

23 A. Yes, sir that's correct.

24 Q. And, --

25 Q. If you would publish Government Exhibit 236 please.

1 Q. I believe when Mr. {RO*PT} plan testified there was a
2 summary of the tall investmentls?

3 A. Yes, sir.

4 Q. And I think we are pulling that up now.

5 . If you would the jury has seen the one before
6 which is Government Exhibit 236 but you would just resume
7 {RAOEULZ} the money that Mr. Knock sent to {RO*T} plan
8 investmentls.

9 A. Yes, sir. Those first three the are the once that were
10 referenced under the mid state bank records. March 7th 90
11 April 12th 90 and April 2nd, 90850 though {THRAR}ls with the
12 remain met {TER} being the name {UT} union Gulf {TKWOEPLT} into
13 Mr. {RO*T}s investment {APBL} {ABG} on the on April 2119 '92
14 160 though {LD} {LSZ} with the {RET} {PHRER} {TER} being named
15 {ATS} a oh, plan aisle opened generally into {RO*PT} plan
16 investmentls. And on the November 18th, 1993, November 26th,
17 1993, November 29th, 1993, from the west America bank records
18 five hundred thousand dollars, 650 thousand us 350 thousand
19 dollars {AOULS} in if American {EBG} premise bank in New York
20 went onto the rocky {TKRAOEPLT} {TKPWROEPLT} for a total of 2.6
21 million dollars {STKPWHRFPLT} if you would go ahead and have a
22 seat again please.

23 .
24 MR. DAVIES: May I approach Your Honor.

25 Q. Agent Lee after John Knock was extra {TKPRAOEUTD} France

1 in January of 1999 did you receive some boxesls of timels that
2 has been turned over the the day day country at {TA} {-RB} loot
3 the American in Paris?

4 A. Yes, I did.

5 Q. Did you look through the boxesls?

6 A. Yes, sir.

7 Q. And did they appear to contain John Knocks personal
8 effectls?

9 A. They did.

10 Q. Showing you Government Exhibit 177 which is the one page
11 of white paper handwritten letter was there one to have item
12 unless the box?

13 A. Yes, sir.

14 Q. That is 177?

15 A. That's correct.

16 Q. And, did {RA} {TKAOE} {TPRAS} see also turn over some
17 items to you?

18 A. Yes, sir. The {ULSZ} marshalls service Randy {TPRAS} see
19 turned over a green not book containing addresses and
20 notations. Which is Government Exhibit, 1178.

21 MR. DAVIES: That is 178.

22 A. Yes, sir.

23 Q. Agent Lee are you also re{TKRAOED} government exhibit 189

24 A, American express record {-PLSZ} record rag Naomi knock?

25 A. Yes, sir I did.

1 Q. And did you prepare a summary of that?

2 A. Yes, sir, I did.

3 Q. And is that -- government exhibit 189 C?

4 A. Yes, sir.

5 MR. DAVIES: Your Honor I would offer 189 C into
6 evidence.

7 THE COURT: It will be received.

8 (Exhibit No. ## admitted.).

9 Q. May the witness stand down again?

10 THE COURT: Yes, sir.

11 Q. If you would please go through your summary for the jury
12 offer Ms. Knockls American express records?

13 A. Yes, sir. Basically what we we did or what I did on this
14 particular account I went through {STWAOER} account history
15 that was provided by American express.

16 . What appeared to be significant transactionls on
17 behalf of Ms. Knock.

18 Starting in June 8th, {179D#} 923, we have a series
19 of Karen tallls apartment San Francisco Al California and again
20 July of '92 and August of '92 and a Hawaii on August 256th,
21 1992, another recent a care in seatly Washington which is
22 just -- northwest.

23 November 12th, {179D#} '92, another transaction in
24 mop lay lay in Lilly Hawaii, September 26th, 93, height regone
25 {TKPWHAOEPB} coal Louisiana Hawaii, on August 1 {1*79#}, 1994

1 again a {REPB} a car in okay home okay Florida, Hawaii.
 2 October 2nd, 1994 rental care again San Francisco California,
 3 and June 10th, '95, another rental car cable {KPWHRAL} okay in
 4 a, Hawaii. On the 23rd 195 a you hall {REPB} {TPHEPBL} in is
 5 an {TPRAPB} wedge {TW-R} New Yorkls used to life in that area,
 6 August 24th, 1995, another one, another rental around the same
 7 time period. That at so no no California again that is to know
 8 no coup tie which is Santa rolls okay area on March 21st, 1996,
 9 and March 29th, 1996, the March 21796 Ms. Knock recent {LD} a
 10 vehicle apartment is an {TPRAPB} vehicle in {PHA*PLS} knock
 11 utilized her car to purchase air {THRAOEUPBD} in {UFPLTD}
 12 {STAEUPT} {AEURP} {TPHRAEUPBLS} San Francisco **. On may 1st,
 13 1996, tour company again in loss among {HRALS} purchased was
 14 made from there and again on may {1EBGD#} '96 from united a
 15 airlines June there was no date in the Lords so we could not
 16 put one Ms. Knock used her credit card American express card
 17 apartment new {HO} {TPHOEUL} so you hue in {PWRAOULS} else
 18 Belgium. And on June 5th, 1996, Ms. knock used her card to
 19 purchase a small purchase in Paris France apartment topless
 20 {SUF} {TPHAOULS}.

21 September 18th, '96, Delta air explains Ms. Knock
 22 purchased a {PEUBGT}ls from Delta airlines, the American
 23 express could not provided us record {TPRPLS} '97 they did not
 24 have them. October 15th of '97. Ms. Knock stayed at the this
 25 used her card {HAPT} this hotel in the neither lands I'll Daar

1 {TKORP} {TPHR*EPT}. ER hand {-PLGS} only August 28 {*FPLTS} '97,
2 {TPH*S} {TPHOBGSD} {UPT} {HRAOEUPLSD} her card apartment the
3 hotel after {TKPWHRAOPBLG} in par relationships France. And
4 then, again on January 30th, 98, another airplane ticket
5 purchased, to the February 12, 98, at this hotel in New York
6 city. And on February 19 {*PTS}, 1999, which was the final
7 transaction we noted was a rental you haul in leave {KWRAET}
8 Louisiana Louisiana.

9 Q. Agent Lee have you also reviewed Government Exhibit 183
10 Citibank {SREUPLS} is records regarding the card former {SE}
11 {TKALS} and Al Madrid?

12 A. Yes, sir.

13 Q. {SRPD} have you prepared a summary of that 183 A?

14 A. Yes, sir.

15 MR. DAVIES: I don't believe I would offer Government
16 Exhibit, 183 A into evidence.

17 THE COURT: It will be received.

18 (Exhibit No. ## admitted.).

19 MR. DAVIES: If you would explain that summary to the
20 jury please special agent Lee.

21 A. Yes this one is much -- more involved. And {KA} {TKA}.
22 On April 7 {*PTS} 1989, by the way I should explain, this
23 particular account is in the name of {PH-R} {SE} deposition
24 Madrid however it e was opened was his {TEUD} as Albert Madrid.
25 Okay {SEUG} to on April 7th, 1989, his card was utilized to

1 recent a car in Vancouver can {TKAFPLT} again in June of 1990,
2 this particular card was {UT} {TPHRAOEULSD} for this hotel in
3 Vancouver can {TKAFPLT} on December 1 {*PLS}, 1990 H this card
4 was used to purchase from T W A airline tickets, excuse me.

5 . On February 26th, and 28th, 1991, and March 21st,
6 1991, excuse me -- I should go to this the one on February
7 16th, 1991 this card was utilized to recent a car apartment in
8 Vancouver can D {TKA}.

9 And on February 28th, 91 and March 21st 91 it was
10 light {AOEUPLSD} apartment this hotel the deal {TA} males in
11 Vancouver Canada on April 28 -- on April 18 {*TD} of 1991 this
12 card was {UPT} {HRAOEUSD} apartment a vials recent a car in
13 Vancouver Canada a few days later the same card was utilized to
14 purchase a {REPBL} tall car in is an {TRAPB} since okay
15 California.

16 Q. And April 22nd, 1991, was that the date that corporal raw
17 {SHAPB} in the RCMP testified that he had April {TPRAOEUP}
18 {TPAPLD} he {TKPWREUFRPBLD} on the ferry to anytime no?

19 A. Yes, sir.

20 Q. And {OEUPB} April 22nd, 1991 he is recent age car in is
21 an Francis {KOFRPBLTS} correct that's correct?

22 Q. If you would go ahead males?

23 A. On July 26th, 1991 again another rental car in Vancouver
24 coon D on September 17th, 91 this card was utilized {TAPTD}
25 hotel {PHRER} {TKA} in Vancouver Canada. Then we are into '92

1 February 2nd '92 this card {WRAOUPLS} {KWHAOUPT} {UD} at the
2 {HRO} {TAEL} bell area if {HROLS} application lags California
3 and then a couple offer weeks later February 19 {*PTS}, '92,
4 this card was {UPT} {TPHRAOEUPLSD} {WHRES} her Canada by the a
5 {SKAEU} resort in the city in Canada.

6 . The next day, which -- the same card understand us
7 was lit ID {HRAO} tote pay rental car in Vancouver Canada on
8 play 12th, 1992, this card was {UT} {THRAOEUPLTD} get a rental
9 car in {HPB} will you low Hawaii.

10 Q. To do you have a time frame generally with regard to play
11 12th was the you will it July 16th that Al Madrid was arrived
12 {TRERD} in Vancouver with a load of hashish of 1992?

13 A. I believe it was 16th or 17 th around that time period.

14 Q. Is to this {TPHOL} no, ma'am in is a couple of Months
15 before he is {UPLT} meantly arrested with the load in van
16 couch?

17 A. That's correct.

18 Q. Go lead, please?

19 A. On July 3rd, 792, generally, rental car in Danka budget
20 rent a car on July {3-R8D#}, '92 around the time period of his
21 arrest charged relate to there care for rental car in Vancouver
22 can {TKAFPLT} this was the the time of his arrest.

23 . And September 1 {*PLS} 93 September 8th, 93,
24 charges was made at FAA RV in is an {SKWROUPLS} California I'm
25 it is not clear what the purpose of this charge was for on

1 September 28 this card was {UT} light ID at the you. Is have
2 you {SRAEUL} league in {WHRAO*EUPLS} her Dan {TKPA} generally
3 {KHR*EUPLS} her being the ski resort and the print tissue
4 Columbia and on March 13th, 1995 which is was the last
5 significant charge, the charge was made to {KA} I can't
6 {TKWRAPB} {A*R} I air however we can't say that because the
7 card {-PLSZ} only {SHROUPLS} {KA} {TPWHAD} {TPHRAPBLD} a
8 {HA*EU}.

9 Q. Did you also review Government Exhibit, 186 which are the
10 bank of Hawaii Lords view for Knock bank account?

11 A. Yes, sir I did.

12 Q. And have you recommend pay summary chart that will help
13 you summarize those records Government Exhibit, 186 C?

14 A. Yes, sir.

15 MR. DAVIES: Your Honor I would offer 186 C into
16 evidence.

17 . . .
18 THE COURT: It will be received.

19 (Exhibit No. ## admitted.).

20 Q. If you could explain your summary chart to the if to the
21 jury please special agent Lee?

22 A. Yes, sir.

23 Q. ?

24 A.

25 On November 1st, 1993 this account was opened

1 jointly. In the name of John and Naomi knock apartment the
 2 bank of Hawaii: It was first deposit was a hundred dollars
 3 apartment the opening to have account the first and only
 4 significant depest at at this time was made on November 9th,
 5 1993. A deposit of 39 though dollars. By Petroleum {EPBG}
 6 {PHRERPBG} apartment a {PRAOEUT} {TPREUPLT} by the {SPWAEUPG}
 7 of Singapore was transferred from Singapore into this account.

8 . This account apartment the bank of Hawaii was
 9 listed as the house hold account in the records.

10 And that is the account number. There was several
 11 transactionls numerous transactionls out of this account those
 12 are significant onels: Open December 12th, 1993, 15,000
 13 dollars cash withdrawal was made. From this account apartment
 14 the bank of Hawaii and {TPHRAOEPLSD} the an {PWAPB} {TOFRBG}
 15 red word {SWEUPLS} anytime my Phillipsls knocks account.

16 Q. For 15,000 dollars.

17 President open December 2nd, just prior to this
 18 withdrawal, 37 hundred dollars was transferred to the CI T I
 19 country in {KAOEUPG} {KWAOEUPG} {KHREU} {TPHAFPLT}.

20 . For what purpose? Open then on January 2 1st, 19
 21 '94 6 though dollars cash was redepoles {TELD} from this
 22 account bank offer red wood {LSZ} into this account.

23 Now the purpose of this re{TK*EUS} was to cover this
 24 check right here on January 26th, 1994. For 11 thousand, five
 25 hundred 89 dollars, the keep to have check {SHROEPLS} the memo

1 was written to this January Edwardls person in the memo stated
2 it was for if you were {KHUR} now most to have money that came
3 out of there 39 though dollars was light {EULTSD} for item
4 {THAPLTS} that those {HOR} the purchase of {TPURPB} {KPHURP}
5 for security alarm, palm trees, and the -- the balance was left
6 in this account right here.

7 MR. DAVIES: Your Honor I would offer into evidence
8 Government Exhibit 179 A, 179 B and 108 which are certified
9 copies to have facts returns {PEU} name knock John Knock and Al
10 birth Madrid. .

11 THE COURT: They will be received.

12 (Exhibit No. ## admitted.).

13 Q. Agent Lee did you review Government Exhibit, 180, the
14 certified copils of Albert Madrids tax returns?

15 A. Yes, sir I did.

16 Q. And by the way does DEA file out a standard booking form
17 a form 202 for people it arrests?

18 A. Yes, sir we did.

19 Q. Have you reviewed Al Madrids 202?

20 A. Yes, sir.

21 Q.

22 And is he an American citizen?

23 A.

24 He is.

25 Q. And did you {PHREP} a summary chart that will help you

1 summarize the certified tax returns of Al Bart mad?

2 A. Yes, sir I did.

3 Q. Is that Government Exhibit 180 A?

4 A. Yes.

5 MR. DAVIES: Your Honor I would offer Government
6 Exhibit 180 A into evidence.

7 THE COURT: It will be received.

8 (Exhibit No. ## admitted.).

9 Q. If you could go through that with the jury, please?

10 A. Yes, sir.

11 . What we utilized was the declear add justice
12 {TEUD} gross income that was declared by Albert Madrid for
13 those tax yearls starting in 1982. In 1982, 83, 84, and 85,
14 Mr. Madrid declared a loss of 20 though dollars, 11 though, 3
15 {THRAUD} 49 hundred dollars rep stillly for those four years.

16 Q. So when something? Is in {TP-R} plan {THPBLs} the that
17 means that {SHRAOEULS} threat e {KHRARD}?

18 A. Yes, sir.

19 Q. If you would go lead?

20 A. In 1986, -- he declared a just add {SKWRAULS} {TKPWRUD}
21 gross Knock offer 9834 dollars 1987 he {TE} {KHRARD} add
22 justice cut of 10,000, 4 '94 dollars.

23 Q. Was 1987 the year the RUBY R load that jewelry Roberts
24 Tom {-PL} go and Gary Vance and others testified about?

25 A. That's correct.

1 Q. In that year Mr. {TPHRA*D} de{KHRAOEURD} 10 '94 9 dollars
2 of income **?

3 A. Yes.

4 Q. If you would go on to 1988 please?

5 A. Yes, sir n 1988 Mr. {PHA*PD} declared 12 thousand, '87 5
6 dollar innocence in income 1989 he declared 26518 {TKPHRARPLS}
7 in knock. And in 1990, he declared 13 thousand, 3 hundred 7
8 dollars in income.

9 Q. Okay?

10
11 A. Scroll on up to the top.

12
13 Q. In 1991, Mr. Madrid declared an add {SKWRUS} gross income
14 offer '95 thousand, 3 \$50s.

15 Mr. Madrid did not do there -- did not sign this
16 particular return. In 1992. He signed it April 26th, 1993.

17
18 Q. So he actually {STAOEUPLD} and filed in 91 return after
19 he has been arrest field the with the hash niche van couch?

20 A. That's correct.

21 Q. In 1992?

22 A. 1992 he declared approximately the same income '95
23 thousand 220 dollars. Again, this return actually {TR} '92 was
24 signed prior to the one for 1991. This one was signed on April
25 15th, 1993.

1 . And in 1993, Mr. Madrid declared income of just of
2 116 thousand, 7 hundred and five.

3 Dollars.

4 . And he signed this the one again in April of 1993.

5 Q. Did {HRUPLS} review Government Exhibit 179 A and B which
6 are the tax returns for anytime {PHAOE} knock and John knock?

7 A. Yes, sir.

8 Q. And did you prepare a summary chart that will help you
9 summarize those records Government Exhibit 179 C, being your
10 summary chart?

11 A. Yes, sir.

12 MR. DAVIES: Your Honor I would offer Government
13 Exhibit 179 C into evidence. .

14 THE COURT: It will be received.

15 (Exhibit No. ## admitted.)?

16 Q. And if you would summaries your chart of your summary
17 chart of anytime throw Knock and John Knocks tax returns?

18 A. Yes, sir. Start not guilty 1986. {EURLS} issues
19 provided for tax returns for anytime know knock, and John
20 knock.

21 . Ms. Knock declared 28 hundred dollar unless knock.
22 In 1986. Whereas John Knock did not file in 1986.

23 . In 1987, Ms. Knock de{KHRAOEURD} 30,000 dollars
24 approximately in income. Mr. knock again did not file any
25 taxls.

1 . In 1988, Ms. Knock de{KHRAOERD} 11 though 759
2 dollars in income and again Mr. knock did not file an income
3 tax return.

4 . 1989, Ms. knock de{KHRAORD} 9900 dollars in knock
5 on her taxls. And Mr. knock did not file.

6 . In 1990, Ms. Knock de{KHRAORD} 23 thousand,
7 dollars in knock. Mr. knock again did not file.

8 . 1991, Ms. Knock de{KHRAOERD} 47 though dollars
9 with approximately income and again Mr. Knock did not file.

10 . In 1992, Ms. Knock de{KHRAORLD} 70 though {THRAR}
11 unless Knock and again Mr. Knock did not file any income tax
12 returnls.

13 In 1993, Ms. income decolored 35 though dollar unless
14 knock, in knock again did not file an income tax return.

15 . in 1994, many Ms. Knock declared 28 though dollar
16 unless knock. Mr. Knock did not file.

17 . In 1994.

18 . In 1995, Ms. Knock de{KHRAOERD} 51 though dollar
19 unless knock.

20 . Mr. knock did not file an income tax return.

21 In N 1996, Ms. Knock de{KHRAORLD} 42 though dollars
22 in income. Mr. Knock did not file. In 1996.

23 . In 1997, Ms. Knock de{KHRAOERD} 30,000 dollar
24 unless income again Mr. knock did not file income tax return.

25 So from that time period of 1986 to 1987, Mr. Knock

1 never filed an income tax return.

2 Q. If you would go ahead and have a seat, please.

3
4 Q. If you testified about the summary of evidence. That
5 we've put into evidence to give then to the clerk?

6 A. Yes.

7 Q. {-R}?

8
9 MR. DAVIES: Thank you I have no further questions.

10 MR. HANKINSON: If we could clarify something. Your
11 Honor. When -- when 180 was being {SHOEP} to the witness he
12 did not have all of 180 in front of him {THFPLT} is the rest of
13 the certified tax records. Of this for Mr. Madrid.

14 THE COURT: Surely.

15
16 MR. DAAR: With {KE} approach Your Honor.

17 THE COURT: Sure.

18
19 (At the bench).

20 (At the bench.).

21 MR. DAAR: We are going get copies I guess right now
22 to have sum {HRAOEPLS} we haven't seem them until now so this
23 might be a good time for a break.

24 THE COURT: No problem.

25 MR. DAAR: Is this.

1 THE COURT: We'll make you a copy. Just give it to
2 him.

3 MR. DAAR: Main we can slight it up. .

4 THE COURT: We can get you each a copy if you will
5 just get it from the clerk.

6 . . .
7 THE COURT: All right.

8 . {PWEF} back in open.

9 THE COURT: Court they need a minute to look at some
10 of those summaries before they begin their cross-examination.
11 Let's take about a 15 minutes, folks.

12 (Jury out.)

13 (Recess taken.)

14 (Jury in.)

15 THE COURT: Be seated, folks.

16 Hold on one minute.

17 CROSS-EXAMINATION

18 BY MR. KENNEDY:

19 Q. Good mornign.

20 A. Good morning, sir.

21 Q. In may of 1988, you and another agent traveled to
22 Luxembourg to check out the account of Jakarta Petrochemical
23 about which you have testified, and the results of which you
24 have summarized for His Honor and the jury; is that correct?

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

1 Q. And in -- in that particular investigation of Jakarta
2 Petrochemical, you determined that that was an account that had
3 been opened by Mr. Claude Duboc using his alias, Anthony
4 Larkin, correct?

5 A. Yes, sir.

6 Q. And, in fact, you determined that Claude Duboc controlled
7 and dispensed the moneys that were dispensed out of that
8 account, correct?

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

10 Q. And as far as you could tell, Mr. Duboc was responsible
11 for both the deposits and the withdrawals into Jakarta
12 Petrochemical, correct?

13 A. Yes, sir.

14 Q. And one of the subaccounts of Jakarta Petrochemical was
15 this account CIE offshore {RA} {SHA} Shaw, correct?

16 A. I believe it was actually another account entirely at
17 another bank, unless you can reference me to something in my
18 report.

19 Q. Have a copy of it here, do you Agent Lee? It's your
20 report dated August 4, '98?

21 A. Yes, sir.

22 Q. All right. Go to the second page.

23 A. Yes, sir.

24 Q. See at the top there. This is after talking about
25 Jakarta Petrochemical as Claude Duboc's account. In paragraph

1 3 you are talking about Duboc utilized many different sub
2 accounts at the bank?

3 A. Yes, sir. I see that.

4 Q. Okay. But actually the CIE that is referenced a little
5 further down in the paragraph, is not a sub account of Jakarta
6 Petrochemical but is, in fact, an entirely separate account of
7 Claude Duboc's?

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

9 Q. Okay. We see a lot of accounts to Minute Master, a lot
10 of withdrawals from the Jakarta, from Duboc Jakarta to Minute
11 Master International; do we not?

12 A. I believe those are deposits, sir.

13 Q. I'm sorry. Those are deposits.

14 Now, you mentioned that these deposits of when they
15 are in United States dollars actually go through a
16 corresponding bank; do they not?

17 A. Yes, sir.

18 Q. But it's a fact, is it not, that when US dollars are
19 transferred, for example, from one non United States country to
20 another United States country, because the currency is United
21 States dollars, there must be a United States corresponding
22 bank engaged in that particular transfer; is that correct?

23 A. That is my understanding. Yes, sir.

24 Q. So those funds are not coming back into the United States
25 of America, but are, in fact, being routed through a United

1 States corresponding bank somewhere abroad, correct?

2 A. From the documents I looked at, sir, for those particular
3 deposits, the bank was in New York. Credit Lyonnaise Bank
4 branch in New York. The -- the transfers were routed through
5 New York, for an eventual deposit into Jakarta Petrochemical.

6 Q. But you are not saying that the money came into the
7 United States of America, into New York, are you?

8 A. Well, in -- in effect it did. When you have
9 international transactions through wire, generally you do not
10 carry currency. So banks wire transfer money to each other.
11 And so, in effect, I would say, yes, sir, it is currency.

12 Q. But Citibank, for example, has corresponding United
13 States CitiBanks in 35 or 40 different countries; do they not?

14 A. I do not know, sir. But, I would assume so. They are a
15 large corporation.

16 Q. Now, the Arab Banking Corporation is another bank account
17 about which you testified; is that correct?

18 A. Yes, sir.

19 Q. That was also determined by you to be a Claude Duboc
20 account; was it not?

21 A. Well, in effect actually he utilized that bank Arab
22 Financial Services and Arab Banking Corporation, he utilized
23 that bank. But, as particular accounts at that bank, we don't
24 have records of it.

25 Q. In as far as you know, the only person who utilized the

1 Arab Financial Services with reference to this case was Claude
2 Duboc, correct?

3 A. Well, the records we have show that some transfers went
4 through those banks that were to the benefit of Mr. Knock.

5 Q. Well, now, you said earlier something about that. You
6 said that Mr. Rothman testified that Mr. Knock sent him money.
7 Do you remember that?

8 A. Yes, sir. That's correct.

9 Q. Well, Mr. Rothman as I recall it was very careful to say
10 that he didn't receive any money from Mr. Knock.

11 A. That's not the way I understand his testimony, sir.

12 So if the record, in fact, reflects that Mr. Rothman
13 said: I didn't receive any money from Mr. Knock, your
14 understanding of the record is that Mr. Rothman didn't mean it?

15 MR. DAVIES: Objection.

16 THE COURT: Argumentative.

17 Q. Isn't it a fact, sir, that you recall very well
18 Mr. Rothman testifying that he didn't receive any money
19 directly from John Knock. That was his testimony; was it not?

20 A. His testimony was that he only spoke to Mr. Knock and
21 that he received money after speaking to Mr. Knock for his
22 investments.

23 Q. I would like you to answer my question. Agent Lee, my
24 question: Did Mr. Rothman testify that he did or did not
25 receive money from Mr. Knock?

1 A. Again, he testified that he spoke to Mr. Knock and then
2 he received money into his account.

3 Q. But, in fact, he received moneys from corporate entities;
4 did he not?

5 A. The wire transfers reflect the name Gulf Development.

6 Q. And Gulf Development was another company of Claude
7 Duboc's; was it not?

8 A. It was a company that has been utilized by the
9 Knock-Duboc organization.

10 MR. KENNEDY: Excuse me. Move to strike, Your Honor.

11 Q. Please listen to my question.

12 MR. DAVIES: Objection, Your Honor.

13 THE COURT: Grant the motion.

14 MR. KENNEDY: Thank you.

15 Q. Agent Lee, you understand that your role here is not as
16 an advocate or a {HAR} bore, do you understand that?

17 A. Yes, sir.

18 Q. You are trying to present a fair and factual --

19 THE COURT: Ask a question, please.

20 MR. KENNEDY: Thank you.

21 Q. Mr. Rothman testified that some corporate entities which
22 you acknowledged were controlled by Claude Duboc sent him the
23 money, indeed after he had conversations with Mr. Knock,
24 correct?

25 A. Yes, sir.

1 Q. Oman Oil and Arab Financial Services again are two
2 companies utilized by Mr. Duboc; are they not?

3 A. Oman Oil is a name utilized by this organization.

4 Q. Excuse me. Excuse me. I'm not talking to you about the
5 organization. I'm asking you specifically about Mr. Duboc.

6 A. I'm sorry, sir. I misunderstood your question.

7 Mr. Duboc did use that specific company, yes, sir.

8 Q. Another entity utilized by Mr. Duboc was Caltex
9 Petroleum; was it not?

10 A. That name was utilized by Mr. Duboc, yes.

11 Q. And I believe, during summary you have read of the plea
12 agreement of Mr. Madrid, Mr. Duboc forfeited or divested -- I
13 think is the -- is the word some 130 million dollars. Is that
14 correct?

15 A. Yes, sir, I believe that was Canadian currency on here.
16 But that would be what I said. Yes, sir.

17 MR. KENNEDY: I would like, if you would, could you
18 run up Government Exhibit 200C.

19 Q. 200C. Do you have a copy of it in front of you?

20 A. No, sir. The clerk has it down there.

21 Q. Actually now it's up, you may be able to read it from the
22 board.

23 A. It's a little bit convoluted there. Let me see if I
24 can -- the Jakarta Petrochemical account, sir.

25 Q. Exactly.

1 A. Okay.

2 Q. Opened May 17th of 1988 and closed May 3rd of '94,
3 correct?

4 A. Yes, sir. That's correct.

5 Q. Closed May 3rd, '94. As a result of an agreement with
6 Mr. Duboc wherein he'd forfeit the balance of that account to
7 the United States government, correct?

8 A. Yes, sir.

9 Q. Now, if you go to the next page of that. The first page
10 actually deals with a deposit. The second page deals with
11 withdrawals, correct?

12 A. Yes, sir.

13 Q. Now, you see there an investment of two million plus in
14 BioChem Pharma, do you not, pharmaceutical?

15 A. Yes, sir, I see that.

16 Q. That was an investment of Mr. Duboc's; was it not?

17 A. Yes, sir.

18 Q. And again, ultimately Mr. Duboc forfeitted the proceeds
19 of that BioChem Pharmaceutical stock; did he not?

20 A. Yes, sir, he did.

21 Q. If you go back up to the page page of 200, please.

22 We see up at the top October 1993, million dollars
23 going into Wang Petrochemical, correct?

24 A. Wang Petrochemical was the depositer.

25 Q. From Wang Petrochemical into Duboc's Jakarta account,

1 correct?

2 A. That's correct.

3 Q. And Wang Petrochemical was a company also in which
4 Mr. Duboc had invested; was it not?

5 A. That was the name of a company Mr. Duboc used, yes, sir.

6 Q. 189C is your summary of the American Express accounting
7 of Mrs. Knock, of Naomi Knock. If you would pull that up. And
8 whichever you are more comfortable with, Agent Lee, reading it
9 from the summary you have in front of you or off of the screen.

10 A. I can read from the summary. Yes, sir.

11 Q. Now, you are aware that the grand jury indicted in this
12 case and the indictment ends sometime in April of 1996.

13 Correct?

14 A. On or about. Yes, sir.

15 Q. So we see here the transactions of Naomi Knock for four
16 years, roughly from '92 up through '96. Do you see that?

17 A. Yes, sir.

18 Q. Okay. Now, those are not all of the transactions on
19 Mrs. Knock's credit card, American Express credit card, are
20 they?

21 A. No, sir. There is are {POURPB}ls and that kind of thing.

22 Q. But those are the ones that you determined to be
23 significant, correct?

24 A. Yes, sir.

25 Q. And you consider it significant that she rented nine or

1 ten automobiles in a four-year period; is that correct?

2 A. I consider it significant, yes, sir, because it tracks
3 Ms. Knock's movements. Yes, sir.

4 Q. So what is significant about this is not the rental of
5 the car, is it?

6 A. It places her in certain places.

7 Q. That is my point.

8 A. Yes, sir.

9 Q. What is significant about it, is not the rental of the
10 car but that it puts her in a particular place at a particular
11 time, correct?

12 A. Yes, sir.

13 Q. And the bulk of those are in Hawaii and Northern
14 California; are they not?

15 A. The bulk, yes, sir.

16 Q. And, in fact, we've had testimony that she lived in
17 Hawaii and had property in Northern California, correct?

18 A. That's correct.

19 Q. Now, you're also aware that in May -- pardon me, in April
20 of '96, her husband, John Knock, was arrested in Paris,
21 correct?

22 A. Yes, sir.

23 Q. And you are aware that she went to visit him at La Sante
24 Prison in Paris actually on several occasions; are you not?

25 A. I'm not personally aware, but it's my understanding that

1 she did.

2 Q. You -- in May of 1996, you took or participated in the
3 taking of fingerprints of John Knock at La Santi Prison; did
4 you not?

5 A. No, sir.

6 Q. You did not. You had presented us earlier in your
7 testimony several days ago some time ago with a card of John
8 Knock's prints that you identified to as his prints; is that
9 correct?

10 A. That's correct.

11 Q. But you didn't take them?

12 A. No, sir. Those were taken here in Gainesville.

13 Q. Okay. Thank you.

14 You did go in April or May of 1996 to Paris; did you
15 not?

16 A. Yes, sir, I did.

17 Q. You were there when Mr. Knock was arrested?

18 A. Yes, sir.

19 Q. And you were aware that he was in Lo Sante Prison in
20 Paris from this middle day of May, 1996 up to a day near the
21 end of January of 1999, correct?

22 A. Yes, sir.

23 Q. Do you know where -- during that period of time, that the
24 number of French lawyers on behalf of Mr. Knock were fighting
25 extradition from France, correct?

1 A. I'm aware that he was fighting extradition. Yes.

2 Q. And that he had lawyers doing it?

3 A. I would assume so. Yes, sir.

4 Q. And that those lawyers were hired by me, correct,
5 Mr. Lee?

6 A. I have no idea who they were hired me.

7 Q. Were you aware of filings that we made -- that I made in
8 '96?

9 MR. DAVIES: Objection, Your Honor.

10 THE COURT: Sustained.

11 Q. And finally let's go to 179C.

12 A. You said 179C?

13 Q. Correct.

14 Q. Actually before we get to that, hold that there, please.

15 There was a record, and I don't find it right now --
16 you may have it in front of you, Agent Lee, wherein there is a
17 thirty-seven hundred dollar payment made by Naomi Knock to some
18 Chinese company.

19 A. Correct.

20 Q. Can you find that again for me?

21 A. I think you are speaking of the bank of Hawaii.

22 Q. Right. The Bank of Hawaii records. Thank you.

23 A. Yes, sir.

24 Q. Are you aware that Naomi Knock is studying marine biology
25 at the University of Hawaii, correct?

1 A. Yes, sir. I believe she has graduated.

2 Q. And now has a degree in marine biology?

3 A. Yes, sir.

4 MR. DAVIES: Objection, relevance.

5 THE COURT: You can ask.

6 Q. Now, are you aware that in furtherance of her studies,
7 she actual attended in {TKPWAPB} {KHRAOEUPBG} China a symposium
8 on marine biology?

9 A. I'm not aware of that. No, sir.

10 Q. You didn't inquire as to what the moneys of the
11 thirty-seven hundred dollars to this Chinese company was sent
12 for?

13 A. I've not had an opportunity to interview Ms. Knock.

14 Q. Well, you didn't try the Chinese?

15 A. No, sir.

16 Q. All right. Now, we see in -- going back to 189C. We see
17 that Mr. Knock did not file income tax returns for 1986,
18 through -- and then scroll down.

19 A. I'm sorry, sir. I'm having difficulty hearing you.

20 Q. I'm sorry. We see from 189 -- excuse me, 189C, I thought
21 it was -- hang on just a second.

22 A. I believe it's 179C, sir.

23 Q. Thank you.

24 179C are the income tax summaries?

25 A. Yes, sir.

1 Q. Okay. That is 179C we've got up there then?

2 A. Yes, sir.

3 Q. So '86 through '95 he filed no returns at all, correct?

4 A. That's correct.

5 Q. And if, in fact it's true that Mr. Knock was earning
6 money illegally between '88 and '96, then his choice would have
7 been to file a return that either confessed to that, or tried
8 to mislead the us government about it, correct?

9 A. I would assume those were his choices. Yes, sir.

10 Q. And, in fact, he chose, rather than file a fraudulent
11 return, to file no return at all, correct?

12 A. That he did.

13 Q. All right.

14 And we know that from '96 to the present through '99
15 at least, Mr. Knock filed no returns at all, correct.

16 A. I only have records up through '97. But I would assume.

17 Q. You would assume that he probably didn't in '98 '97,
18 {9D#} 88, 99?

19 A. Yes, sir.

20 Q. That is a fair assumption, Agent Lee that also coincides
21 that with the time that Mr. Knock has been in jail on these
22 charges, correct?

23 A. Yes, sir.

24 MR. KENNEDY: Thank you.

25 THE COURT: Mr. Daar.

CROSS-EXAMINATION

1

2

BY MR. DAAR:

3

Q. Good morning, Agent Lee.

4

A. Good morning, sir.

5

Q. You have reviewed the plea agreement, Exhibit 35,

6

which -- a portion of which was submitted to the jury, correct?

7

A. I've just read those portions that I've read to the jury.

8

Other than that --

9

Q. You have not seen the rest of the agreement?

10

A. I've not read the rest of it. No, sir.

11

Q. Do you have Exhibit 135 in front of you, sir?

12

A. Yes, sir.

13

Q. Now, directing your attention to the bottom of the -- the document is entitled plea agreement, correct?

14

15

A. Yes, sir. That's correct.

16

Q. Okay. And directing your attention to the the second time, the small letter A appears on the bottom of the first

17

18

page. Do you see that there?

19

A. Yes, sir.

20

Q. Immediately above that, what does the document say?

21

A. It says: Therefore the attorney general of Canada agrees to the following and states that --

22

23

Q. And then there is a list of four letters underneath that heading?

24

25

A. Yes, sir.

1 Q. And if you could read to the jury letter C and then
2 Section II.

3 A. Counsel for the attorney general of Canada will inform
4 the sentencing judge of the following. The full nature and
5 extent of the accused's activities with respect to this case
6 as set out in the statement of facts attached hereto as
7 Appendix A.

8 Q. Okay.

9 Now, this is a section, at least according to your
10 understanding, where the attorney general of Canada agrees to
11 do certain things with respect to this agreement, correct?

12 A. That is what they say. Yes, sir.

13 Q. And one of the things this attorney general agrees to do,
14 pursuant to this agreement, is to inform the sentencing judge
15 of the nature and extent of the accused's activities set out in
16 the statement of facts attached hereto as Appendix A, correct?

17 A. Yes, sir.

18 Q. Okay. Now, there are four appendixes attached to this
19 plea agreement: A, B, C and D, correct?

20 A. A is quite lengthy. B, C, and D. Yes, sir.

21 Q. A is a statement of facts which you read to the jury,
22 correct?

23 A. Portions yes, sir.

24 Q. Okay. Now, did my client sign Appendix A that you read
25 to the jury?

1 A. No one signed it, sir.

2 Q. Okay. Did my client sign Appendix B?

3 A. Yes, sir. He signed Appendix B.

4 Q. Is there a witness to that signature?

5 A. Yes, sir.

6 Q. Same is true for Appendix C?

7 A. That's correct.

8 Q. And the same is true for Appendix D; is that correct?

9 A. Yes, sir.

10 Q. Okay. Going back to the beginning of the agreement on
11 the second page. Directing your attention to the bottom
12 portion where it states: Unless the accused, Albert Joseph
13 Madrid, agrees the following. Do you see that section?

14 A. Yes, sir, I do.

15 Q. According to this agreement, what did Mr. Madrid agree
16 to?

17 A. I will read it, sir. And the accused, Albert Joseph
18 Madrid, agrees the following and states that he will enter a
19 guilty plea to the three counts described herein.

20 An appropriate range of sentence in this case is six
21 to eight years on each count to be served on {KOURPBLTD}ly he
22 has possession and control of the moneys currently on deposit
23 in account number 50411028-01 with the bank Neal deParis in
24 Singapore, to the credit of John Burn, and that the said moneys
25 represent the proceeds of crime within the meaning of that term

1 in Section 462.3 of the criminal code.

2 Q. Agent Lee, let me perhaps speed the process up. Spare
3 the jury the details. Second D says that he will transfer the
4 money from that account to the Canadian government, correct, in
5 essence?

6 A. Section D it -- it transfers it to the government of
7 Singapore.

8 Q. I'm sorry.

9 A. Yes.

10 Q. And Section E says that he will give up the range -- the
11 title of a Range Rover to Canada?

12 A. Yes, sir.

13 Q. Section F says if -- if information develops as to other
14 assets or resources related to illegal activities, he will
15 forfeit those?

16 A. That's correct.

17 Q. And D states that he is to receive advice from his
18 Canadian attorney, correct?

19 A. Yes, sir.

20 Q. Now, nowhere in that section that we just read, the
21 section that states what my client just agreed to, does it say
22 that he agreed to the statement of facts prepared by the
23 government Appendix A, does it?

24 A. There is no statement to that effect. No, sir.

25 Q. Now, Appendix A, you've read that, correct?

1 A. Yes, sir. The majority.

2 Q. Okay. And certainly there are portions of Appendix A
3 which are certainly outside the personal knowledge of my
4 client, correct?

5 A. I would say that would be fair.

6 Q. Okay. In other words, there are certain things which
7 he'd have no way to know whether they are true or not, correct?

8 A. Well, I wouldn't necessarily go that far. I would say
9 that there is things he may not have known personally at the
10 time that they occurred. But I would say he knew the vast
11 bulk.

12 Q. He knew the vast bulk of it. But, there was some that he
13 could not have possibly have known personally, correct?
14 There is things about the activities of the government -- and
15 when it sleeps to surveil people, correct?

16 A. I would agree.

17 Q. Okay. Now, I apologize for not having written down the
18 exhibit number. But, after you showed the jury your summary
19 from the Rothman summary, 191C, you then referenced to a three
20 hundred thousand dollars transaction involving John Burdin, do
21 you recall that?

22 A. Yes, sir.

23 Q. That you placed up for the jury to see?

24 A. That would be correct, sir.

25 Q. And that represented, to my understanding, 300,000

1 dollars which flowed into the account 504; is that correct?

2 A. That would be correct, yes, sir.

3 Q. And then if we look at the statement, Appendix A to the
4 the plea agreement, it actually references that depest in
5 paragraph 37, correct?

6 A. Let me get to that particular paragraph.

7 Yes, sir. It appears to do so.

8 Q. Okay.

9 So Mr. Madrid, pursuant to this agreement, agreed to
10 forfeit all money that was in that account, correct?

11 A. Yes, sir.

12 Q. And that included a three hundred thousand dollars
13 deposit, correct?

14 A. Yes, sir.

15 Q. And total came out to roughly 3.5 million dollars,
16 correct?

17 A. The -- the total was roughly 3.5 million. We did not
18 have records of that particular account. So I don't know what
19 depests and withdrawals were made. But that was the amount
20 that was forfeitted, three and a half million dollars.

21 Q. That went to Singapore not to Gainesville?

22 A. No, sir.

23 {} S T A R T

24 Q. You smiled, because you would like it to come here?

25 A. I would like for the government of the United States

1 involve beneficiary {TPREUTD} this particular work yes, sir.

2 Q. As opposed to the government of can {TKAFRPBLGTS} as
3 opposed to the government of Singapore?

4 Q.

5 Q.

6 So to your knowledge, Mr. Madrid has forfeited any
7 moneys that were generated through his activities in Canada.

8 A. No, sir. This is the only account that I know of that
9 he's forfeited but no I don't know that he's forfeitted all of
10 his drug money.

11 Q. You don't {flow|know} of any other accounts that he has
12 not forfeited correct?

13 A. I D not {flow|know} of any other accounts that he hams
14 not forfeited, yes, sir.

15 Going to your summary of the Madrid credit card.

16 . You basically went through the credit card
17 statement and extracted for the jury the entries that you
18 considered significant, correct.

19 A. That would be correct.

20 Q. And there are were obviously edition {TRAOEPLS} on that
21 card {STPH*EBGS} with a local use of the card with {TPWH} the
22 anti Oak by the purge year correct?

23 A. I believe so yes, sir.

24 Q. Do {PHREGS} particular type things no {WERLS} and home
25 depot and those kind of things?

1 A. Yes, sir that is my recollection.

2 Q. Okay and you don't {flow|know} whether Mr. Albert Madrid
3 used to card or his mother Mercedes Madrid used to card?

4 A. I do not know.

5 Q. Okay but, you decided that the entries consistent with
6 domestic when I say do mess tech I don't mean United states I
7 mean house hold type use in the anti Oak pass by the {PWURG}
8 you?

9 A.

10 Well I was not {SRAOEGT}ing those type of things I
11 you with you was {SR*EG}ing drug traffic.

12 Q. Okay now, those things that you {EBGTS} tracted you don't
13 know what the purpose of the use of the card was, other than to
14 rent a car, correct?

15 A. Other than to recent a car and hotel.

16 Q. Yes. I mean, For example the car that was {TROEPBLTD}
17 day of his arrest we do {flow|know} was used, because he was
18 arrested in that that white Taurus I think it appears here on
19 the 17th of July. The day to have arrest right?

20 A. Yes, sir.

21 Q. That is the car that they actually find and take the note
22 book out of correct?

23 A. I believe it was the same vehicle but I didn't see the
24 card.

25 Q. It is next with that that leads US to believe that that

1 is the {KWRAO*ULS} {SAEG} correct?

2 A. Yes, sir.

3 Now, the rest of those entries, merely identify the
4 significance of them to you, is that they identify a a location
5 which Mr. Madrid may have been it is in is that fair?

6 A.

7 That is fire.

8 Q. So those are almost markers as to where Mr. Madrid was .
9 I believe {SORBGS} yes, sir?

10 Q. And basically, if I can summarize your summary, the use
11 of this card shows that {PHRAOEUPL}ly from 4, 7, 89, to 7, 17,
12 '92 when he was arrested, that Mr. Madrid periodically and not
13 a lot used the card to N the Vancouver area subject to certain
14 company {SHRUP}s?

15 A. Yes, sir.

16 Q. Now, you identified a trip to San Francisco in April of
17 91.

18 . And you identified a trip to Los Angeles, and you
19 identified a trip to honor will you low and you identify a trip
20 to is an {SKWRO*EPS} she, correct.

21 A. Yes, sir.

22 Q. Now, the is an {SKWRO*EPS}, trip, did you go to this RV
23 place and try to find out what happened . no, sir?

24 Q. When were you assigned to this case?

25 A. I was as signed to this case in December of 1995.

1 Q. Now, when you were assigned to this case, Mr. Duboc,
2 Mr. Darmon, and Mr. Knock had already been indicted, correct?

3 A. Yes, sir.

4 Q. Mr. Madrid had not?

5 A.

6 That's correct.

7 Q. Now, in {TK-PS} {PWER} of '95, in early '96 you were
8 aware that there has been significant communication visiting,
9 transferring of information between the Canadian authorities,
10 and the {THAORT} unless the United States?

11 A. Yes, sir.

12 Q. You both were {SHRAERPG} information, correct?

13 A. Yes, sir.

14 Q. One significant event, in terms of your investigation,
15 was in February of '96, out to have blue, I shouldn't use the
16 word blue, Ms. Roberts shows up, correct?

17 A. Yes, sir.

18 Q. And she provided a significant amount of information,
19 correct?

20 A. Yes, sir.

21 Q. And she in fact contradicts information that you had
22 received from other witnesses,?

23 MR. DAVIES: Objection Your Honor.

24 THE COURT: Sustained.

25 Q. She was debriefed February, March, April of that year,

1 correct?

2 MR. DAVIES: Objection Your Honor.

3 THE COURT: Yes, sustained.

4 Q. Did she give a series of statement tolls the government?

5 MR. DAVIES: Objection. .

6 THE COURT: Well, the, he can say Yes or no but we
7 are not going to unless they have something that came out open
8 direct about those money transfers that is all he testified to.
9 He can as it Yes or no.

10 MR. DAAR: Let me just.

11 Q. Did she gave a {SER} {HRAOEPLS} of statement tolls the
12 government?

13 A. Yes.

14 Q. And that information was shared with Canada?

15 A. Portionls of some of that information was shared with
16 Canada.

17 Q. Okay?

18 . Now, when if you know, was Mr. Madrid arrested in
19 Mexico.

20 A. I believe it was sometime in mid '96.

21 Q. Okay?

22 . And he was arrested because Julie robberls had set
23 him up to be arrested, correct.

24 A. Ms. Roberts identified where he was at, yes, sir.

25 Q. Okay?

1 . Well actually {PH*PLS} Roberts {SPWEP} {TKELD} him
2 to be there so that she would be a bargaining chip for when she
3 surrendered, correct.

4 A. I don't know if that is correct, sir Ms. Roberts flu
5 where he was and she related that to the Canadian government.

6 Q. Okay?

7 . So when Mr. Madrid is arrested Ms. Roberts has
8 already given several {STAOEPLT}s important {SHRUP}s of which
9 you shared with the {KA} {TPHAD} I don' knows, correct.

10 A. The portions relating to -- Mr. Madrid, yes, sir.

11 Q. Okay?

12 . Now, Mr. Madrid apartment the point that he is
13 arrested in Mexico is not charged in Gainesville, is he.

14 MR. DAVIES: Objection Your Honor.

15 THE COURT: Sustained I think that is what we are
16 going to be that is part of what is here is -- what was
17 involved in this charge. I think I sums {STAEUP} the
18 objection.

19 Q. When was Mr. Madrid {TKPHRAOEUTD} if Gainesville?

20 A.

21 I believe it was January 1999.

22 Q. When was John Knock brought to the United States?

23 A. Either late January or early February of 1999.

24 Q. You believe that Mr. Madrid was indicted before before
25 Mr. Knock was brought to the United States?

1 A. The dates are -- they run together certain significant
2 things going on but I think it was around the same if I am fire
3 {KWRAOD} I can't say which was first or second I have to
4 looking at the indictment again.

5 Q. Now, the information that Roberts had provided with
6 respect to Mr. Madrid, was provided to the Canadians, correct?

7 A. Again portions of it were.

8 Q. As it related to Mr. Madrid?

9 A. Yes, sir.

10 Q. Okay?

11 . You didn't hold anything back {TPWR} the Canadians
12 about Mr. Madrid.

13 A. Well there was some things they didn't ask -- they didn't
14 need. I mean their portion to have investigation was over.
15 They already such as the stash houses they already flu that
16 kind offer stuff.

17 Q. Now at the time that Mr. Madrid was arrested in being
18 brought back to Canada, did any the one inform the Canadians
19 that three years later you were intended to diet Mr. Madrid?

20 MR. DAVIES: Objection.

21 THE COURT: Sustained.

22 Q. To your knowledge, when Mr. Madrid pled guilty to the
23 offense that he excited in Canada was he informed that there
24 were going to be charges filed against anytime the United
25 States?

1 MR. DAVIES: Objection Your Honor.

2 THE COURT: Sustained.

3 Q. Going back to exhibit 135.

4 . . . yes, sir.

5 Q. The -- the third fourth page of the Exhibit is signed by
6 David give {SREUP}s, who is Mr. Madrids attorney, as agent for
7 Albert {SKWROLS} I have Madrid, do you see that?

8 A.

9 Yes, sir.

10 Q. What is the date on that signature?

11 A. It appears to be July 22nd, 1996.

12 Q. Was Mr. Madrid {ST*EUL} in Mexico July 22nd, 1996?

13 A. I did not know, sir.

14 Q. Well what is the date if you know, that Mr. Madrid
15 actually pled guilty?

16 A. I D not know sir unless can you point me to something.

17 Q. Looking at an pen {TKEUPBG} C O D, the date there.

18 A. Yes, sir I see that.

19 A. I mean excuse me Appendix D.

20 He signed that particular Appendix on September 12th,
21 1996.

22 Q. And Appendix C?

23 A. He signed that particular Appendix on December 12th,
24 1996.

25 Q. And D?

1 A. He signed an pep Dix D on de{PWER} 12th, 1996.

2 Q. So there appears to be a four to five month time {STPAPB}
3 between time that his attorney entered the agreement, and
4 Mr. Madrid finally executed the there?

5 A. Say time span between signaturels, yes, sir.

6 MR. DAAR: That is all I have you were thank you. .

7 THE COURT: Government.

8 REDIRECT EXAMINATION.

9 MR. DAVIES:

10 Q. Agent Lee just so the record is clear you published four
11 P.A. gems to have plea agreement the jury had copies of those
12 four {TKPA} pages?

13 A. Y yes, sir.

14 Q. Is the entire plea agreement in evidence for jury to
15 looking at and review when they {TKHREUR} right if they
16 {TKWAPBT} to?

17 A. Yes, sir.

18 Q. And a just so the jury nose since they haven't seen it
19 later would you read the the very first paragraph the one
20 starting as wherea's {SKWROS} I was?

21 A. Where as {SKWROLS} I have {STPHROEL} and referred to as
22 the {ABG} {SKAOULGSD}, as represented by his counsel {TKA} did
23 {SRAEUD} give {STPRAOEUPLS} lapse entered into me newspaper
24 understand with to have attorney again of Canada with respect
25 to charges he {TPA} {SRELS} in Vancouver British Columbia and

1 under {SEB} {STWAOULS} 4, 2 and section 179.1 and 19.12 of the
2 narcotic control act as state out in the statement of facts as
3 Appendix A **.

4 Q. The statement of facts an pen {TKEPBL} A is what you were
5 reading to the jury on directed examination when you published
6 that?

7 A. Yes, sir.

8 MR. DAVIES: May I {PHRAOEFRPB} the with the I don't
9 believe.

10 THE COURT: Yes.

11

12 Q. Referring to you page 4 of the plea agreement. Would you
13 tell jury who signed it and what he said who he represented
14 himself to be?

15 A. David Givins signed it as agent for Albert {SKWROPLS} eve
16 Madrid.

17 Q.

18 The signature block specifically says a David give
19 voice as agent for Albert {SKWROPLS} eve Madrid.

20 A. Word for word.

21 Q. And are those four Appendix {TLS} A B C and D attached to
22 the plea agreement that David give {SREUPLS} signed as agent
23 for Albert Joseph Madrid?

24 A. Yes, sir.

25 Q. You were asked about whether three point 5 million

1 dollars was all the money that Al Madrid had. If Al Madrid was
2 involved with 30 tons lewds 60 thousand dollars pound loadls
3 woman's or twice a year and the hash was sell {TPORG} a
4 thousand dollars a pound would that be a hospital more than 3.5
5 million dollars.

6 MR. DAAR: Objection no expertise.

7 THE COURT: Well that just calls for math.

8 Q. ?

9 A.

10 It would be much more.

11 Q. Mr. Kennedy asked you about the Jakarta {PE} {TRO} chem
12 records?

13 A. Yes, sir.

14 Q. The first set of records without pulling it up dealt with
15 key key Ranch and some of that money to pay for the key kick
16 came from Caltex spell let I believe you will sum missed?

17 A. Yes, sir.

18 Q. Do you pull up, 200, C.

19

20 Q. And agency Lee, can you say government {KPHREUBLGT} 200 C
21 there top . I have it in front of me yes, sir demand just for
22 the record, those are the -- this is your summary to have
23 Jakarta {PE} {TRO} chem account amount client {HRAOEUP}
24 {TPHALS}}?

25 A. Yes, sir.

1 Q. In addition to call text Petroleum providing money for
2 the kick key property did they also make deposits as is
3 {THREPLTD} on that sum Lee onto the {SKWREBG} petro chem
4 account?

5 A. Yes, sir.

6 Q. If you would go to the next page of that {KPEUPBLT},
7 please.

8 . Scroll down a bit.

9 . That is good.

10 And showing do you next page, {THRAOEPLS} are
11 withdrawals from the Jakarta {PE} {TRO} chem account is that
12 correct.

13 A. Yes, sir.

14 Q. And Title Guarantee make withdrawals from the {SKWREBG}
15 {PE} {TRO} chem account . yes, sir they received 30,000 dollars
16 on December 1st, 1992?

17 MR. DAVIES: Thank you.

18 . You were asked to summarize Mr. Rothmanls marshal
19 Rothmans testimony. Did marshal {RO*PT} plan testify that he
20 {TKELD} with John Knock.

21 A. Al {HROPBL} yes, sir.

22 Q. And then {PHRAOEPB} come to Marshall {RO*PT} plan
23 investments?

24 A. Yes, sir demand with regard to nameless of corporations,
25 with regard to the wee key Ranch property, did John Knock buy

1 that with using the name of a foreign corporation.

2 A. He {TPHERBL}ly used his own name then transferred it to a
3 foreign {KP-RPGS} yes, sir.

4 Q. I believe that cups was {KHAOEUP} {TUPBG} Klein?

5 A. {STKPWHRELS} with regard to the two million dollar house
6 on {KA} {HA} Louisiana was that bought by John Knock and then
7 {TRAPBLS} {TPARLD} to along Congress corporation.

8 A. Yes, sir.

9 Q. And I believe that corporation was {SKWREUP} clung
10 management?

11 A. Yes, sir that's correct.

12 Q. So Claude Duboc wasn't the only one using corporation
13 name tolls {HRAOEULD} their income and their wealth was he?

14 A. No, sir.

15 Q. With regard to Mr. Knock's tax realize American city
16 {SHEPB}s regard to pay takesls on money they earn regardless of
17 where they earn it?

18 A. Yes, sir.

19 Q. Is John Knock paid any takeses since 1986?

20 A. Nope.

21 MR. DAVIES: Thank you no further questions.

22 THE COURT: You may step down.

23 . Folk, soundls like an old song but I again have
24 matters over the lunch hour not convicted this case.

25 . It's going to take me until 130 to dispeoples of

1 them so you are going to have along lunch break remember not to
2 discuss the case am yourselves or with anyone I'll see you
3 apartment 130 please.

4 Jury out at ##.

5

6

7

8 Q. 1, 2,?

9 THE COURT: Be seated, folks.

10

11 Jury in.

12 THE COURT: Just be seated, please. Par {PARP}.

13 Government call their next with the happen {HAPB} yes, sir .
14 the government would recall Carl Lilley.

15 THE COURT: You are still under oath Mr. Lilley.

16 THE WITNESS: Yes, sir.

17 THE COURT:

18 DIRECT EXAMINATION.

19 MR. HANKINSON:

20 Q. Recommend understand of your name please sir?

21 A.

22 Carl Lilley.

23 Q. And recommend us where are you cure {RAPBL}ly as sign .
24 I'm group supervisor in Denver Colorado for the financial
25 investigative as accept removal group?

1 Q. And your with the drug {EP} enforcement administration?

2 A. Yes, sir.

3 Q. Give understand a -- a brief run down of your prior law
4 {EP} {TPOERP} president experience agent Lilley?

5 A. I came with DEA in March of 1987.

6 I served almost 10 years here in Gainesville Florida.

7 And '96 I was transferred to dep veer in August of
8 '96 I ream resident agent in charge of three offices in the
9 wells {TERP} Colorado area and I just was res {TAOEPBLD} to
10 Denver as the {TKPWoup} supervisor prior to that I was a
11 {PREUFR} in {SUF} full {BG} Virginia. Where I was the sergeant
12 responsible for the special investigative unit which had the
13 responsibility for also investigating violation {OFLS} the drug
14 laws.

15 Q. So you came with DEA when?

16 A. March of 179 '87.

17 Q. And how long were you a police officer?

18 A. Just 10 years so you would have started with the police
19 some time in the late 70s.

20 A. Yes.

21 Q. All right. On March 15th of 1994, did you have occasion
22 to execute or take part in the execution of the search warrant
23 apartment 4442 {KA} {HA} Louisiana after {TPHR*} honor will you
24 will you?

25 A. Yes, sir I did.

1 Q. And whose -- who did you understand resided at that
2 residence?

3 A. John and Naomi Knock.

4 Q. And?

5 MR. HANKINSON: If I might approach Your Honor.

6 THE COURT: Yes, sir.

7 Q. I show you what has been marked for identification as
8 Government Exhibit 56 A, B and C. Are those photographs of
9 the house there at {KA} {HA} Louisiana Avenue?

10 A. Yes, sir, they are.

11 MR. HANKINSON: I would offer those into evidence
12 Government Exhibit 56 A B and C.

13 THE COURT: Without objection.

14 (Exhibit No. ## admitted.).

15 MR. HANKINSON: I would ask to publish the
16 photographs Your Honor.

17 THE COURT: You may do so.

18 . Can you {SKAOE} the {PWAOR} from where you are
19 {SPHRAEPTD} Lilley.

20 A. Yes, sir.

21 Q. Okay and, tell understand what this depicts if you
22 would, please, sir?

23 A. This is the front entrance to the residence apartment on
24 {KA} {HA} Louisiana Avenue.

25 Q. Go to the next the one.

1

2

Q. Okay and what is there showing?

3

A. This is eye back yard photograph.

4

THE COURT: Is that B.

5

MR. HANKINSON:

6

Q. Tell us from the exhibit?

7

A. This is 56 B.

8

Q. And the first one was 56 A?

9

A. Yes, sir.

10

Q. And, describe to understand what we are looking apartment please, sir there?

12

A. Is the back of the house and we are -- the Daar {K*ES} made leads over to like a guest house. And we have the {STPWEUPL}ing pool there.

13

14

Q. Okay the -- you are trialing off on me just a little bit. Where --

15

A. As you would go from left to right on this house, .

16

Q. Okay you have a walkway area which is like a porch. And then, as you continue on, you come to a {TKPW*UPS} house?

17

18

Q. So it would be to {RAOUR} right to left?

19

A. {HREFPT} to right.

20

Q. So the {TKPW*UPS} house is over on? Side?

21

A. Yes, sir.

22

Q. Okay?

23

. ? Proceed, please.

24

25

1

2 Q. And what is shown in -- 56 C?

3 A. This shows the another {AOEPG} {EL} with the double
4 doorls French double doors actual at the guest house there.

5 Q. So this is the back of the house?

6 A. Yes, sir.

7 Q. All right.

8 And this is where you executed the is search warrant
9 on March 16th, 794.

10 A. {SKPWHREPLS} and how was {THAEUT} done.

11 A. Obtained L A {STRA*ET} {URLS} spell agent with DEA in the
12 honor will you will you office obtained the affidavit from the
13 magistrate.

14 And three DEA agentses, and three memberls I believe
15 of the United States custom service as instead. The entry way
16 to the house there is a wall surrounding the home. And the
17 wooden doorls to open up for the driveway. If you enter in one
18 of those photograph {TLS} garage would be on your Farina {HRD}.
19 The Bronco was there. And, we had to scale the wall crime over
20 the top of the wall to get to the residence because it was
21 locked up.

22 Q. Okay and, during the course of the search what was your
23 role in the search? Did you have a position?

24 A. Well I was the case agent responsible for all of the
25 evidence that was the obtained and sized from that residence.

1 Q. Okay so you took custody to have various items of
2 evidence?

3 A. Yes, sir.

4 MR. HANKINSON: {PEU} might approach Your Honor.

5 Q. I've placed before you some items that have been marked
6 as Government Exhibits 37, through 53.

7 And 58 and 59.

8 . Are those some various travel records that were
9 found in the course of the search there apartment the Knock
10 remains deposition.

11 A. Yes, sir hotel and rental car records.

12 Q. Okay and airline tickets in a couple of instances?

13 A. Yes, sir.

14 MR. HANKINSON: I would offer those into evidence
15 Government Exhibit 37 through 53, and 58 and 59.

16 THE COURT: Without objection.

17 (Exhibit No. ## admitted.).

18 Q. And where were those items located agent Lilley there?

19 A. Is a desk like a china cabinet desk in the very back of
20 the house. Is a deny kind of a large screen tell {TWRAOEUGS}
21 set and this desk was up against one of the walls.

22 MR. HANKINSON: If I might approach Your Honor.

23 THE COURT: Uh-huh.

24 Q. I have placed before you what has been marked for ID
25 {TPEUS} as Government Exhibit 54, 55, and 57.

1 Are those some letters that you found there in the
2 Knock home on March 15th, 1994.

3 A. Yes, sir, I did.

4 MR. HANKINSON: I would offer those into evidence
5 Your Honor as Government Exhibit 54, 55 and 57.

6 MR. KENNEDY: Objection, Your Honor. The person the
7 letters -- the {HUS} and wife. .

8 THE COURT: That is overruled.

9 MR. HANKINSON: Thank you. I would ask to start B
10 Government Exhibit 54. And, ask to publish that Your Honor.

11 THE COURT: You may do so.
12

13 Q. Agent Lilley are you able to see freight there or do you
14 have the original in front offer you I'm going ask you to read
15 certain portion offense those records if you need to pull it
16 out. Do so but I would ask you -- why don't we just start at
17 the beginning of this letter just read understand the first
18 couple of accept senses?

19 THE COURT: How about a date, please.

20 MR. HANKINSON: There is not a date on it I don't
21 believe.

22 THE COURT: All right.

23 A. The letter beings high honey I'm going write another ram
24 {PHREUPG} letter that will probably not get mailed. Well, I
25 {TPHEUPLSD} meetings in again Florida Virginia I don't mean the

1 put the work off on you but I {flow|know} that is what you feel
2 like I'm doing. I tried tell you that trying to put a little
3 time frame on what I'm doing is not possible.

4 But I did any way. And now I feel guilty and you
5 feel left out again.

6 Q. Okay lets go on -- skip one paragraph town if you would
7 go to the paragraph where it starts you know.

8
9 A. You know I it's and think and talk and think some more
10 and assume other people did {STKO} the same thing but they
11 don't when I start {THRRLD} project I {SK-PTD} certain things
12 and when I got lower only 50 permanent of what I need was here
13 and nobody could understand why the other 50 with was needed.
14 So I have been lying at an color for two days warts for parts
15 that should have been here but ash aren't.

16 Q. Let {TKPWOPLS} to the next page.

17
18 Q. All right. If you would read the first couple of
19 sentencels apartment the top of the page there, page 2?

20 A. It's pretty flat and calm and nothing insight. But I
21 would leather be on the move.

22
23 Q. Read the next SEP tells?

24 A. I guess it's like when I try and help you with your
25 project and I don't understand why everything has to be so

1 exact.

2 Q. Lets skip on down the page just a little bit.

3 . To the paragraph that says I hope.

4 A. I hope the house isn't too much of a bother. But I
5 {flow|know} it is. And I hope to be and are in good form **.

6 Q. {SKAOEUP} to the next page,?

7 Q. All right. On the next page, are there I indicated there
8 aren't dates but do there appear to to be some figures that
9 maybe date tons top left hand corner and then about half way
10 down the page?

11 A. Yes. The top beginning 6-3. And half way down would be
12 7/3.

13 Q. Okay and you aware in some instances people would put the
14 day first and the month second?

15 A. Yes, sir.

16 Q. All right. Lets start down lower where it says 7/3.
17 High slim. And it's a little {TPA} Ted up here so you may need
18 to read freight what is in front of you?

19 A. I just made another and I can't -- what this word is I
20 just made another. I needed a scale to do the job. And a
21 {SKWRAP} P.A. niece company makels one for ER fishing boat
22 {THRAPLTS} work apartment sale well I put {TPHRE} a request in
23 for one, throw is {STRAOEFPLD} out two a {PHRO*PL} ago and
24 everybody says Yes, no problems.

25 Well guess what? {WHEUPB} got lower nobody knows

1 what I'm talking about.

2 The head of operations here have you never met him
3 doesn't see the need for it so we have to lay a drive for two
4 days while CD and Al buy one and fly it over.

5 . We pick -- and I don't know what that board it up
6 apartment high {TPHOP} off the boom it accept it up it is right
7 it is the wrong one. We have no option but to go on, and to
8 {WOUPLT}.

9 . The seals are calm but with the -- roll of the
10 ship, it will not -- and then, the {SE} {ROPS} is {KRAOEPLSD}
11 out well so goes life. Deposition {PAEPT} men I live you P.A.
12 {THREUBG}.

13 Q. That is signed Patrick?

14 A. Signed Patrick.

15 Q. Now, up there he mentionedls the initialls I guess it's
16 CD. Is that -- let me see where we are.

17 A. Fourth sentence from the end.

18 Q. CD and you can't read it real well is that pretty clear
19 {RER} ton original front of you?

20 A. Yes can you read it fine ton original.

21 Q.

22 In the course of your investigation did you {RUP}
23 across anybody with the initialls CD?

24 A.

25 Claude Duboc had the initialls CD.

1 Q. And the next -- word I believe is Al. ?

2 A.

3 Yes, sir.

4 Q. In the course to have investigation did you run across
5 anybody named Al in this investigation?

6 A. {KWRL} ad in.

7 Q. Let {TKPWOS} to the next page.

8

9 Q. And again, there appears to be something that maybe a
10 date and in the top left hand corner. But what it's say?

11 A. 7/3.

12

13 Q. Lets go down to the second paragraph where it says I must
14 con fields.

15 Read there, please.

16 A. I must cop fields I was very apprehensive about doing
17 {THFPLT} I had never been to sea this long before. Most of my
18 time in the past has been in the port or going from one
19 place to another never longer than four or five hours away and
20 not out of sight of land. {PAFR} par {THFPLT} is the first
21 time.

22 . I -- and I don't know that second word -- I would
23 have brought a lap top or something, for edition ten tear
24 president tomorrow I will try to gym {BL} the scale and see if
25 it works with better.

1

2

3

4

Q. Lets skip down, paragraph, -- again, is there does there appear to be something that maybe a date there in the top left happened corner?

5

6

7

8

Q. All right lets go to the last paragraph on this page.

9

10

A. High hone knee I'm going over my figures again all of this wave or something that is not quiet right.

11

12

. But we can make it work. The way I figure it I will have about a one percent error. I hope.

13

14

Q. Lets go to the next page, please.

15

16

Q. Lets skip down to where it says: Boy I can't -- believe. Do you see that just read that sentence for us, please, sir?

17

18

A. I see it I'm trying to figure out one to have words. Boy I can't believe and the next world is 7 K T S is what it looks like to me.

19

20

Q. Do you think that might be nots?

21

22

A. Notls is to so slow I went ton bow deck think I would have the {WAOEUPLD} in my fames and the open sea in front of me. The window was at my back. So slow something along.

23

24

Q. Maybe drifting along?

25

A.

1 Drifting. Possibly.

2 Q. All right. . Lets go to the next page.

3

4 Q. Lets come down to {WEURT} startls with cease are calm.

5

6 A. In the middle to have second sentence.

7 Q. Yes. Read that last sentence of that paragraph I guess
8 there are two sent sincels there?

9 A. Seals are cool {K-PL} with just a little as well W. the
10 slip tend topples list five to 10 degreels not bad.

11 . It will be interesting to find out if I get
12 happened sick after this.

13 Q. Go ahead read the next paragraph for some?

14 A. For some reason the ship seems to be pitching more but
15 the seas are flat we are pitching 6 to 7 degrees. It appears
16 to be side to say.

17 I think to be would {WHRAOEUBG} it but sale Lee
18 wouldn't.

19 We are one day away from the straights and we are
20 heighting a Sid as well that is not visible from above that is
21 what the is making the ship roll.

22

23 Q. And then is -- two numbers/there what is that?

24 A. Again, 12,/3.

25 Q. All right. . And go ahead and read that line for

1 understand, {PHRAEFRPBLGTS} I -- well we are going in to the in
2 {TKEU} {KWRAP} open {SHAP} it hams only been 8 days I keep
3 remembering that song title slow both to China CD the boss
4 calls about every Roy other buys I keep thinking about the
5 house and what a {PHRAOB} it has become love you Patrick?

6 Q. Okay let {TKPWOPLS} to the next page place.

7

8 Q. Looking at the dates top next page, would you believe
9 that we are doing the -- the day or the month first?

10 A.

11 It appears to be the day. First.

12

13 Q. So, if we are talking 13/3 that would be what {PHO*PL}
14 and day?

15 A.

16 March the 13th.

17 Q. And {THREB} next date down is 14/3. What double that
18 would be?

19 A. March the 14th.

20 Q. Okay?

21 . Go down to the bottom of this page, please, where
22 it says, March 15th. Or it's 15/3.

23 Would you read that, please.

24 A. Got a call last night it seems some friends were going
25 to meet had an accident. Everybody is pretty de{PREUPLSD}.

1 And I'm trying keep their spiritls up.

2

3 Q. And the next paragraph?

4 A. Well, we think we have everything {SORPTD} out. Our
5 patterns seems logically our time frame, our -- I can't read
6 that word. Be accept back about 30 days.

7

8 Q. Okay next page, please.

9 . Continue reading.

10 Q. No. Lets go down the bottom to have this page where it
11 says March 17th and a copy up here if is a little difficult to
12 read, but start on there March 17th {*FRPLGTS} today we made up
13 our minds we are going to Singapore. Our SAT phone it's on the
14 mink. And signing is three quarters days closer than
15 father-in-law I'll partnerships friendship {TPHREURBLD} by e
16 book of short stories last night?

17 Q. Lets skip to Cigna {KHRUR} at the bottom to have that is
18 what?

19 A. Is love Patrick.

20 Q. All right. Lets {SKWEUP} to the next page if you could,
21 please.

22

23 Q. And, on March 18th, would you read understand that par
24 {TKPRAF}, please, sir?

25 A. Well with the is {SUPLD} and there are no football or

1 basketball gamels {KRAOEULS}ing along apartment 8 notls supply
2 knee {SKAOEUPS} with mixed showers I keep thinking about a
3 {TKAO*EUF} boat charter operation Inn do necessary I can't. I
4 don't think anybody is doing it yet.

5 And the government is trying to promote {TUR}
6 {REUFRPB}. The country is stretches for more than 2 though
7 milels east and the government claims all to have ocean lying
8 with in it. Island territory. I just don't {flow|know} if I
9 am willing to try. I hope to see you soap. Will be in signing
10 on 20, milled day, love Patrick.

11 Q. Okay lets skip down a little bit an in the next
12 paragraph. And then see where it starts it looks like I'm
13 going to --

14 A. It lookls like I'm going to do some more wed if I can
15 find the room to try anything {STORD} out I don't know when I
16 will see you next hopefully soon, I love you Patrick.

17
18 Q. And then go ahead to the next full paragraph?

19 A. Hello generally I have been {PHRAEUPG} with a telex all
20 day.

21 Quiet {TPR*UPS} freighting but, --

22 A. I can't -- I don't know understand that word.

23 Q. Okay?

24 A. To play with you. I can't {WA*EUT} to play with you.

25 Q. Signed Patrick?

1 A. Pat trick.

2 Q. And then the next paragraph please?

3 A. We arrive in {SEUPG} tomorrow noon. I will spend one
4 night in {TKUPLS} you will {TKOFRB}. I haven't layered from
5 you yet so I am assuming that Uh-huh {TPHRB} European soon I
6 will be in {TKUPLS} you will {TKAFRB} for five days and then
7 back to the {TREU} pop {EUBGS}.

8 Q. Where is does you will {TKOFRB}?

9 A. It's slip {-TS} my mind right now unless it's the real
10 {TKULS} I will {TKOFRP} {TKER} Florida Mae.

11 Q. There is a real {TKULS} ever {TKOUFL} gear Florida
12 {TPHRAE}?

13 A. Yes there is and the in the {TR} partnership x were coded
14 as Singapore.

15 Q. All right.

16 . If we can go to exhibit 55 {*RBGS} please.

17 . Is.

18 Q. All right. . This -- lets just start at the being and
19 read that first sentence for US, please.

20 A. High honey it is and wed is crossed through 7, 14. I
21 have been traveling for two days.

22

23 Q. Jump down to -- scroll down please a little built so it
24 says I realize?

25 Q. Fourth {HRAOEUP} down from the bottom?

1 A. I realize that it is going to be hard for both of US to
2 adjust to living together. Again when we both start to wind
3 down.

4 Q. Okay hold open. Let understand catch up here.

5
6 Q. Okay?

7 . Go ahead where it says I'm going I'm going to be
8 up here for at least the next/three weeks. I will be, at the
9 dog house off and on, and should be back here this week.
10 Two/three three.

11 Q. Lets skip dope to the next paragraph. I'm glad owe: .
12 I'm glad that to pee is doing okay I just read a training
13 manual on dogs.

14

15 Q. Go to the next page and the bottom paragraph?

16 A. I think it's possible for them to not be able to prove
17 anything on -- I can't make out that word but it lapse a double
18 under line.

19 . And {KHEU} okay.

20 Q. The word {KWHREU} okay is?

21 A. Yes.

22 Q. Where is {KHREU} okay?

23 Q. Where is {KHREU} {KOFRPBLGT} I don't know?

24 Q. Do you know what state that is?

25 A. No.

1 Q. All right {TKPWOFPLT} ahead finish reading?

2 Q. He has --

3 A. I don't understand that word before that. He has --
4 mining claimls with George, his brother and, unless -- somebody
5 says anything else, it should hold. I will try to get funds
6 transferred before the end of the month to the Dr.

7
8 Q. Go ahead I'm going to a Thai Thai Thai any way one of
9 those restaurantls with the boyls to night, CD D K Ted and me.

10 Q. Now the P initialls D K D they come up during the course
11 of the investigation at all?

12 A. Yes, sir they have. David cap LAN.

13 Q. Is there another D K also?

14 A.

15 Donald Kennedy.

16 Q. Okay those are two D Ks that have come up for you . yes,
17 sir?

18 Q. And the them Ted has that came up?

19 A. It hams come up as Ted Clark referred to as the uncle.

20 Q. All right. Lets go to next '57 please.

21
22 Q. Now lets -- pull it up just a little bit. This -- has I
23 date at the top right hand corner. ?

24 A. Yes, sir.

25 Q. What is that?

1 A.

2 It's F E B as in February, 12th.

3 Q. Read that paragraph for understand, please?

4 A. High {PHOPB} know well we messed each other on Saturday.
5 Showed me how inadequate my {PHRAEUP}ing was.

6 . I finally called Lisbeth to see if you work W if
7 you were okay she said she had talked to you at 7 so I guess
8 you were how would up somewhere W.

9 . I'm going to James -- country, because that is
10 where Bob is.

11 . And if I back up, to me, that looks like
12 {SKWRUPLS} J U M S country.

13 Q. J U M Es?

14 A. Yes, sir.

15 Q. Has the name of jewel come up during the {TKHOUFRLS}
16 investigation?

17 A. That is one of the wife's of Claude Duboc.

18 Q. Where is jewel from?

19 A.

20 They land.

21 A. Now there was another name up there.

22 Lisbeth. I think it is L I {*EULZ}. Has the name
23 came up in the course of this investigation.

24 A. Lisbeth God map in San Francisco.

25 Q. That was a lawyer that testified here?

1 A. Yes.

2 Q. She is commonly nope as Lisbeth?

3 A. Yes, sir.

4 Q. All right. . So -- I'm going to {SKWRUPLS} country
5 because that is where Bob is. I think that is where we left
6 off?

7 A. Yes.

8 Q. Read from there, please?

9 A. I don't know how long I will be there.

10 . I will try apartment the if I remember phone next
11 Saturday. And again on Sunday apartment 8, your time.

12 . The if I remember phone is {PHOUP} {TAEUPB} side.
13 See the diagram.

14 Q. There is -- what is this -- it says, the if I remember
15 phone is mountain side then there appears to be a little
16 drawing. You can probably see the {TKRUPBG} a little better
17 than we can describe what it {SHROEPLS} there?

18 A. The {TPAO*EURB} phone being up apartment the top picture
19 12 o'clock.

20 Q. Okay?

21 A. At 3 o'clock it has got a house.

22 . 9 o'clock plain wall {BG}. And then right at the
23 ten to 11 o'clock, {POPBL} blew the word {SKWRAP} {SAR} or
24 {SKWRAP} store may be.

25 Q. Okay?

1 . And then, read the rest of that paragraph.

2 A. To help clear things up, in the {TPUPT} {KPHRUR}, maybe
3 you should pick out phonels.

4 . Hope --.

5 Q.

6 Q. What do you understand this diagram is showing?

7 A. The area that the pay phones that -- that held make the
8 phone calls to at the time deposition {TPHRAEPTD} this letter.

9 Q. Okay?

10 . Lets go down to the bottom to have next par
11 {TKPRAF} where it says this thing.

12 .

13 A. This thing is going to take a membership {PHUPL} of of
14 two monthlies.

15 Q. All right. . Let {TKPWOPLS} to the next page, please.

16 .

17 Q. The -- the third sentence there. Startls -- I'm.

18 A. I'm {PHREUL}ing it oh, from France and you know how they
19 are here.

20 Q. Okay then as you come down to -- next paragraph. Where I
21 have the DOT?

22 A. I wish I had some plan or idea but I just can't con so
23 long date my thoughts yet.

24 .

25 Q. Go ahead.

1

2

3

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25

A. Al is in good shape physical and mental, I'm sure he feels {HROPBL} but he seems to be making the best of it.

Q. Thank you.

Q. If I might approach Your Honor?

THE COURT: Uh-huh.

Q. I have pleased before you what has been marked for identification as Government Exhibit 177, 178.

I believe those were items previously identified by {STP} Mr. Lee. As being accept from France. From Mr. Knocks personal effects.

A. Yes, sir.

Q. Okay happen {HAPB} I would over those into evidence that time you were Ken Ken objection Your Honor private privileged matters of Mr. Knock and also attorney/client {KPHRUPL} {KAEUPGS} {OFLS} his?

THE COURT: Overruled.

Q. If I might publish Government Exhibit 177, please. ?

THE COURT: Yes, sir.

Q. This is oh, a little dim here so you are going to have to help understand read along here, please Mr. Lilley.

. Is there a date at the top of this thing.

1 A. Yes, sir. April 17th. 1996. Is in the first sentence.

2

3 Q. All right. Read along was here Mr. Lilley?

4 A. I was picked up on April 17th, 1996. At a phone booth.
5 On the {KHRAPLS} release. This was not happen instance looking
6 back on it. I see that it was planned by the us agency for at
7 least 60 days. I has been in contact with an individual
8 {A*PBT} every two months.

9 Q. Okay -- let me interrupt you real briefly was there some
10 individual that you understand was in contact with Mr. Knock
11 every couple of month?

12 A. Yes. There was Julie Robert.

13 Q. Okay go ahead?

14 Q. In March?

15 A. In March I received a means {SAEG} on my answering
16 service {THPT} she needed to talk with me open the March 28th,
17 about the 20th of March I received a meals sag that that she
18 could not reach me until April 17th that it was important.

19 . She was in a panic, which was not unusual because
20 CD had put her in a position way beyond her depth.

21 . I arrived by metro about 730 p.m. for my call.
22 There was an 8 p.m.

23 . As I was weight not guilty in the call box for the
24 call I was arrested at gun point and handcuffed.

25 Apartment first I asked why and what was happening to

1 me. And was told that I would be informed later. P.A. {-R}
 2 par I was then handcuffed behind my back and my happeneds were
 3 lifted up to the middle of my back {TKEULS} {KHROEBGT}ing my
 4 shoulder. I was placed in a car driven to {HRA*} {TKA}
 5 {TPAPBS} at the national super fits police headquarterses. And
 6 I was searched and asked my name {EPT} set {RAFPLT} at this
 7 point I was taken into a room par {HREPB} officer of the second
 8 command to have unit, and hand cuffls were removed.

9 {STKPWHRFPLT} thank you.

10 If I might approach Your Honor.

11 THE COURT: Uh-huh.

12 Q. I've placed before you agent Lilley, Government Exhibit
 13 60 and 61. For identification. Are those some other itemls
 14 that were obtained in the Knock home?

15 A. Apartment the Knock search warrant, yes, sir.

16 Q. Okay and I'm {SOR} Lee I {SKWREUFRPLD} back just a little
 17 bit. There was back on March 15th, '94, correct?

18 A. Yes, sir.

19 Q. And what does Government Exhibit, 60 appear to be?

20 A. 60 is -- it appears to be an original leaps agreement.
 21 For the residence apartment 6281 {PHA*} me I'll {TA} road is an
 22 the {TA} {RO} {KA} California with Mr. the John Knock.

23 Q. And who does it pure port that he is leasing from?

24 A. {HO} wee H A W I, A G, I Swiss corporation.

25 MR. HANKINSON: I would over that into evidence

1 Government Exhibit, number 60.

2 THE COURT: It will be received.

3 (Exhibit No. ## admitted.).

4 Q. Lets go to Government Exhibit 61. If you would, please.
5 . keep 60 handy we are going to come back to that in
6 a minute.

7 . Is 61 another item that you found there in the
8 house.

9 A. Yes, I did. .

10 Q. Okay?

11 . And, what is that.

12 A. This is a letter added to any in a {TKAL} help dated 11,
13 20, 792.

14 MR. HANKINSON: I would offer that into evidence
15 Government Exhibit, 61.

16 THE COURT: Yes it's in I need to {flow|know} that
17 spelling.

18 THE WITNESS: The name is {TPHR*} I N O N, and then
19 the top to have page D A L E M, .

20 THE COURT: Thank you.

21 A. Add in bucks {HR*UBGS} B {PWOURG}.

22 MR. HANKINSON: I would ask to publish 61, Your Honor
23 can.

24 THE COURT: You may do so.

25 Q. Read through this although {T-R} with you {PHRAUS} agent

1 Lilley?

2 A. Dear any {PHOPB}, thanks for the letter. When be called
3 we were in hopes of having an earlier meting because we
4 recently had some dis{TURG}ing noise about the office innocence
5 again Virginia we understand that management is having some
6 problems and that {STPWEUFP}ing with office systems probably
7 advice {BL}.

8 To put our minds apartment east, so we can all I'm
9 {SKWRAOEU} your {HOL} lay days we would like to {flow|know}
10 your {THOEUPT}s on this if you {TPHOLTSD} any problems.

11 We also {flow|know} that if these {KHAP} gems need to
12 be add {SRAOPLS} notices is needed so alternativels can be
13 found.

14 . Will be in the brings toll hotel, ten room {PHPBT}
15 blank par {REPBL}s. 22732,-3800 par reps. In gentlemen knee
16 Virginia from January 6th through the 8th. Looking forward to
17 seeing you. And if you could drop understand a line before
18 then it would be {PRERB} {KWRAOEPTD}. Par {PARP} also thank
19 you very much for the cards we almost and have already utilized
20 those for our holidays we'll try not to be too X after the Gant
21 happen {HOL} liels you have of Hawaii department of {PWO} {TA}
22 knee honor will you will you Hawaii.

23 Q. University, {HAPB} LAN if I might approach Your Honor?

24 THE COURT: Uh-huh.

25 Q.

1 Q. I've placed before you some items that have been marked
2 for identification Government Exhibit 62 and 63. Are those
3 some other items that you found there in the house?

4 A. Yes, sir. Those are maps actually I found those in the
5 garage, {STKPWHREUBL}.

6 MR. HANKINSON: I would offer those into evidence
7 Government Exhibit, 62 and 63.

8 THE COURT: They will be received.

9 (Exhibit No. ## admitted.).

10 Q. Okay?

11 . Tell us what those are maps of, and you may want
12 to pull them out I don't know it's more than the one map in
13 each one.

14 A. Well exhibit 62, is specifically shows Vancouver, and the
15 straightls of Georgia, in between Vancouver and Vancouver
16 island.

17 But no no {PHAOE},.

18 Q. What {KEBLD} offer chart it's?

19 A.

20 {TPHAUT} {KHRE} map.

21 Q. All right. .. There is aheading on it at the top. I
22 guess left happened there what does it indicate?

23 Q. Your right happened now I'm sorry?

24 A. Sorry.

25

1 Q. Top right happened?

2 A. It was Canada ton top right happened corner.

3 Q. What is the leading there?

4 A. British Columbia van do you if a key straight to Dixon
5 entrance.

6 Q. It would be easier if you stood up and showed understand
7 that. So we don't hit that microphone, again.

8

9 Q. Now where is Vancouver open there?

10 A. Right here. (Indicating.) The Pacific ocean.

11 Q. Thank you {FPL}?

12

13 Q. And the other chart is what that would be Government
14 Exhibit, 63?

15 A. Yes, sir.

16 A. This is the northern Pacific ocean.

17 Okay similar to what I just slowed.

18 Q. You may not want to pull it out.

19

20 MR. HANKINSON: If I might approach Your Honor.

21 Q. I have pleased before you what has been {TPARBGD} for
22 identification as Government Exhibit 64 and 66.

23 And I believe 65 which I believe is already in
24 evidence. Are those three itemls that you sized in if Knock
25 house back in March of '94.

1 A. Yes, sir I sized these in the up stairls plaster bedroom.

2 Q. At this time I would over into evidence Government
3 Exhibit 64, and 66. And it's my believe that 65 is already in
4 evidence if not, I would over it again?

5 THE COURT: Without objection they will all three be
6 received.

7 (Exhibit No. ## admitted.).

8 Q. Lets start with 64 tell us what 64, please, sir?

9 A. 64 is a {HR*EPT} ER packet with plastic business cards
10 holders in it.

11 . This particular {HROR} one has numb rules placels
12 of business and restaurants.

13 Q. And, the -- the 65 is what?

14 A. 65?

15 Q. ?

16 A. Yes that is already in evidence as the two -- the 65 is
17 the photo Al bum that I found on a night shelf. In the master
18 bedroom.

19 Q. And what are this pictures -- tell understand what the
20 pictures are recommend us of that?

21 A. Those are the {KEL} cop {TER} {SKAOEUPG} in {SRAEL}
22 month, Canada.

23 Q. Okay and exhibit 66.

24 A. Was found along of Exhibit 65. In the {PHRAPLS} {TER}
25 bedroom.

1 . With -- photographs open some water. , a {POET},
2 some photographs of Mr. Knock, and some other individuals that
3 I don't know.

4 Q. Okay what kind of boat does it appear to be {TPOFRPBLGTS}
5 a fairly large sailboat?

6 Q. Can you tell anything from the photos the area that it
7 appears to be?

8 A. There is actually one of picture in here, yeah, I can.
9 Ton right hand side of the photo Al bum, the first photograph
10 is Mr. Knock. As you flip it up, it shows you like a pier and
11 some view hats with the name of the possible location there.

12 Q.

13 Q. Okay can you tell where that is . as far as what country,
14 not from this sign here, no?

15 Q. Okay?

16 . ?

17 MR. HANKINSON: If I might approach Your Honor.

18 Q. I have pleased before you what has been marked for
19 identification as Government Exhibit, 67 is that another item
20 that you {T-P} found in in the house?

21 A. Yes, sir.

22 Q. And what does that appear to be?

23 A. There this is the residential lease, 4441 {KA} {HA}
24 Louisiana {HO*P} {HO*PB} Hawaii. Between {KWRUP} {KWRUPBG}
25 management limited the land {HRORLD} and anytime any Phillipsls

1 and John Knock {HULS} and wife tenant.

2 Q. Does that appear to be a -- the {SPOELD} lease for the
3 house you were searching?

4 A. Yes. And -- this one indicates the residence is 4441 the
5 search war {HRAPLT} was for 4442.

6
7 Q. Okay?

8 A. Now, I don't remember understand lengthing a 4441.

9 Q. Now who does that indicate that the knocks are lease
10 {THG} house {TPRP}?

11 A. {KWREUP} clung management {HRPTD}.

12 Q. With which you understand to be what?

13 A. Is a she'll corporation, in Hong-Kong.

14 Q. Lets go back to ask you to put into evidence -- well let
15 me over into evidence Government Exhibit 67.

16
17 THE COURT: It will be received.

18 (Exhibit No. ## admitted.).

19 Q. Let {TKPWOPLS} back and compare in Government Exhibit 60
20 I believe you earlier indicated there was a lease on the me
21 I'll {TA} road property.

22 . Does it appear to be a similar type lease, a lease
23 from the a foreign country.

24 A. Yes. The -- the me I'll {TA} property was with {HA*}
25 {WA*} H A W I, A G.

1 Q. And, the Knock's.

2

3 Q.

4 Q. And this one is with what company?

5 A. Are you saying this one?

6 Q. The {KA} {HA} Louisiana property?

7 A. The {KA} {HA} {KA} {PHRA} property is {SKWREUP} {KHRUPG}
8 management. In Hong Kong.

9 Q. All right let {TKPWOPLS} to Government Exhibit, 68 which
10 I believe I have placed B there in front of you too, sir.

11 . What does that appear to be.

12 A. This appears to be a -- a letter. Dated {SKWRAP} 26th,
13 1994.

14 Q. And that was taken out of the home of March 15th, 794?

15 A. Yes, sir it is.

16 MR. HANKINSON: I would offer that into evidence
17 Government Exhibit 68.

18 THE COURT: It will be received.

19 (Exhibit No. ## admitted.).

20 Q. If I might publish that Your Honor?

21 THE COURT: Yes, sir.

22 Q. Read along on Government Exhibit 68 with understand
23 please, agent Lilley.

24 . ?

25 A.