

F U Q R A T R I A L P L A N O U T L I N E

The following is the preliminary trial plan outline for the FUQRA prosecution.

PRETRIAL MOTIONS:

Hearing on defendants' suppression motions is underway and will be completed on August 26, 1993. Any remaining motions will be heard beginning September 7, 1993, before jury selection begins. Defendants have not indicated how many other motions will be filed as yet. Likely motions include:

1. SEVERANCE:

A severance motion would be in regard to UPSHUR and WILLIAMS. The court has refused such a motion once, but did grant severance to MCGHEE. UPSHUR and WILLIAMS will be tried first. MCGHEE's trial will probably be set in early 1994.

TRIAL PLAN:

The trial breaks down into five phases. The workers' compensation phase, the tax phase, the rental property phase, the FUQRA organization phase, and the murder-arson conspiracy phase.

This is the simplest approach. Each of these phases represents a definable scheme which demonstrates concert of action among the defendants, an obvious profit motive (in the first three), a less obvious political motive, and a logical chronology of events as they were uncovered during the investigation.

I. Workers' Compensation Phase:

The object here is to demonstrate the pattern of workers' compensation claims (including benefit payments) that extended from 1984 through 1991.

A. Discovery:

1. Susan Fenger's investigation of the names of suspected FUQRA members matched against Colorado Department of Labor and Employment records to determine

if any had claims. The discovery of eight claims by five defendants.

a. Witnesses and applicable evidence:

1) Kathleen McKinna

EXHIBIT ____ CCIA Chart

* 2) John Mudd (CCIA Records Custodian)

EXHIBITS ____ through ____ Eight

CCIA Claims

* 3) Wayne Drummond (UI and WC Records Custodian)

EXHIBITS ____ through ____ UI

Employer tax records showing no record of RDW Construction, CCC Carpentry, Samuel McClane Carpenters and Home Builders, DW Construction, etc. and workers' compensation claim records.

4) Susan Marie Fenger

EXHIBITS ____ through ____

* 5) Mary Ellen Rhodes (Memorial Hospital Records Custodian)

6) Dr. Donald Gazibara (MCGHEE as DARYL WOODS)

* 7) Sandra Clark (Penrose Community and Penrose Hospital Records Custodian/MCGHEE as WOODS, PIERRE and UPSHUR as RAY WILLIAMS)

8) Dr. James J. O'Donnell (MCGHEE as VINCENTE RAFAEL PIERRE)

9) Dr. David S. Matthews (MCGHEE as VINCENTE RAFAEL PIERRE)

10) Dr. Edward M. Fitzgerald (MCGHEE as VINCENTE RAFAEL PIERRE and CHILDS as KENNETH GREEN)

11) Jacqueline Holmes (Workers' Compensation Program Administrator)

12) Anne Ruybal (PIERRE Adjuster)

- 13) Deborah Sue Scott (WOODS Adjuster)
- 14) Tom Bell (WOODS Adjuster)
- 15) Patricia Rowland (WOODS Settlement)
- * 16) Mike W. Sala (Ace Cash Express Records Custodian/WOODS/PIERRE)
- * 17) Bobby Hernandez (WOODS Swim Contract)
- * 18) Pam Iconis (Colorado Springs Adult Education Records Custodian/WOODS)
- * 19) Marianne A. Berdon (Pikes Peak Community College Records Custodian /WOODS)
- 20) Dr. Edward H. Wood (UPSHUR as RAY WILLIAMS)
- 21) Dr. Theodore L. Stringer (UPSHUR as RAY WILLIAMS)
- 22) Dr. Orderia Mitchell (UPSHUR as UPSHUR)
- 23) Dr. J. Bradley Gibson (UPSHUR as UPSHUR)
- * 24) Joan Hanshaw (Providence Hospital Records Custodian/UPSHUR)
- 25) Dr. Larry Hull (UPSHUR as UPSHUR)
- 26) Dr. Edward A. Nygard (UPSHUR as UPSHUR)
- 27) Dr. Timothy F. Rogers (UPSHUR as UPSHUR)
- 28) Dr. John Mas II (UPSHUR as UPSHUR)
- 29) Dr. John Magill (UPSHUR as UPSHUR)
- * 30) Donna Sherwood (Williamsport Hospital Records Custodian/UPSHUR as UPSHUR)
- 31) Dr. Richard A. Heitman (UPSHUR as RAY)

WILLIAMS)

32) Dr. J. Bradley Gibson (UPSHUR as RAY
WILLIAMS)

33) Dr. Ronald E. Walker (UPSHUR as RAY
WILLIAMS)

34) Dr. John Kruper (UPSHUR as UPSHUR)

35) Dr. Robert Carlton (UPSHUR as UPSHUR)

36) Dr. Ahmed Kneifati (UPSHUR as UPSHUR)

37) Bruce Stewart (UPSHUR as RAY WILLIAMS)

38) Irwin Kravitz (UPSHUR as UPSHUR)

39) Chiquita Stephens (UPSHUR as UPSHUR)

40) Rose Temeyosa (UPSHUR as UPSHUR)

41) Jodie Magnuson (UPSHUR as UPSHUR)

42) Elaine Dunn (UPSHUR as UPSHUR)

43) Nina Redeker (UPSHUR as UPSHUR)

44) Tony Gornick (UPSHUR as UPSHUR)

45) Debbi Langford (UPSHUR as UPSHUR)

46) Beth Wyman (UPSHUR as UPSHUR)

47) Susan Oleson (UPSHUR as UPSHUR)

48) Ellen Lambert (UPSHUR as UPSHUR)

49) Don Boughton (UPSHUR as RAY WILLIAMS)

50) Julia Baki (UPSHUR as RAY WILLIAMS)

51) Brian Surage (UPSHUR as RAY WILLIAMS)

52) Ann Vendrely (UPSHUR as RAY WILLIAMS)

53) Beth S. Miller (UPSHUR as RAY
WILLIAMS)

54) Glenn M. Campbell (UPSHUR as RAY
WILLIAMS)

- 55) Dr. Edward M. Fitzgerald (CHILDS as GREEN)
- * 56) Nicole Holt (CHILDS as GREEN)
- 57) Mary Ellerman (CHILDS as GREEN)
- 58) Andrew R. Traugutt (CHILDS as GREEN)
- 59) Kathleen Robinson (CHILDS as GREEN)
- 60) Mark Rau (CHILDS as GREEN)
- 61) Lois Lanter (CHILDS as GREEN)
- 62) Bruce Magnuson (CHILDS as GREEN)
- 63) Joanne Miranda (CHILDS as GREEN)
- 64) Felipe M. Vigil (CHILDS as GREEN)
- 65) James F. Merline (CHILDS as GREEN)
- 66) Christine Rabe (CHILDS as GREEN)
- 67) Dr. Charles D. Magill (CHILDS as JOHNSON)
- * 68) Delores S. Williams (CHILDS as JOHNSON)
- 69) Paula Sparacino (JAMES WILLIAMS as MCCLANE)
- 70) Eugene Keyser (JAMES WILLIAMS as MCCLANE)
- 71) Dr. James A. Larkin (JAMES WILLIAMS as MCCLANE)
- 72) Dr. Timothy Bogren (JAMES WILLIAMS as MCCLANE)
- 73) Dr. William Morse (JAMES WILLIAMS as MCCLANE)
- 74) Dr. Orlando Racalde (JAMES WILLIAMS as MCCLANE)

75) Dr. Robert Brumfield (JAMES WILLIAMS as MCCLANE)

76) Dr. Craig T. McMullens (JAMES WILLIAMS as MCCLANE)

77) Dr. Charles Hornbaker (JAMES WILLIAMS as MCCLANE)

78) Peter J. Cordell (JAMES WILLIAMS as MCCLANE)

79) William A. Alexander (Attorney for CHRIS JOHNSON)

80) Steven V. Mullens (Attorney for WOODS)

81) James A. May (Attorney for MCCLANE, GREEN, UPSHUR, and RAY WILLIAMS)

2. The discovery of switched or false identities.

a. Witnesses and applicable evidence

- * 1) Kim J. Taha (Social Security Administration Records Custodian)
- * 2) Mary K. Stickney (Radiology Records Custodian/UPSHUR as RAY WILLIAMS/MCGHEE as WOODS/PIERRE)
- 3) Dr. John C. Stears (WOODS/PIERRE x-rays)
- 4) Dr. David Rubenstein (UPSHUR/WILLIAMS x-rays)
- 5) Dr. J. Michael Hoffman (WOODS/PIERRE and WILLIAMS/UPSHUR x-rays)
- 6) Dr. Douglas Ubelaker (WOODS/PIERRE and WILLIAMS/UPSHUR x-rays)
- 7) Richard Williams (FBI Handwriting Expert)
- 8) Thomas E. Dewan
10th and Pennsylvania Avenue N. W.
Washington D.C. 20535

Federal Bureau of Investigation Lab Agent and handwriting expert Dewan can testify to his examination and comparison of handwriting on documents obtained from Professional Security International against the known handwriting of JAMES D. WILLIAMS appearing on United States Passport Application records. Mr. Dewan's testimony will show that JAMES D, WILLIAMS executed the questioned writings appearing in a Professional Security International ledger record.

9) Dennis Mooney (CBI Handwriting Expert/
UPSHUR as RAY WILLIAMS)

10) Robert Witt (FBI Fingerprint Expert)

11) Andrew J. Bradley (Document Examiner)
5686 S. Court Place
Littleton, Colorado 80120

Mr. Bradley can testify to his examination and comparison of handwriting involving the workers' compensation documents, murder conspiracy documents, and arson conspiracy documents. Mr. Bradley's testimony will show that the defendants can be physically identified as authoring numerous questioned documents.

12) Raymond Williams, Jr. (Real Person)

* 13) Donald L. Burton (Motor Vehicle
Records Custodian)

* 14) Tom Tankseley (Pennsylvania Motor
Vehicle Records Custodian)

15) Michael Carter
143 Union Boulevard, Suite 330
Lakewood, Colorado 80228

United States Department of State Special Agent Carter can testify to Department of State standard operating procedures in regard to passport issuance. Special Agent Carter can identify the passports and/or passport applications of JAMES D. WILLIAMS, CHRIS CHILDS, EDWARD IVAN

MCGHEE, EDWARD NICOLAS LAURENT FLINTON, STEPHAN PAUL PASTER, etc., used as known handwriting in identifying various questioned documents.

- * 16) David Petrie (U.S. Military Records Custodian)
- 17) Wayne N. Long (UPSHUR as RAY WILLIAMS)
- 18) William J. Burd (Notary/UPSHUR as UPSHUR)

B. Fraud:

1. Establishing that defendants were employed while receiving benefits (including duration and amount of benefit payments)

a. Witnesses and applicable evidence:

- 1) Charles Michael Ludeke (MCGHEE as WOODS/PIERRE)
- 2) Rodney J. Arbogast (CHILDS as GREEN)
- 3) Donna R. Arbogast (CHILDS as GREEN)
- 4) Donald G. Shelstad (UPSHUR as RAY WILLIAMS)
- 5) Maurine S. Jerrell (RDW Construction Insurance Policy)
- 6) Edward J. Besner (UPSHUR as RAY WILLIAMS)
- 7) Don C. Haberer (UPSHUR as RAY WILLIAMS)
- 8) Linda Kenny (UPSHUR as UPSHUR)
- * 9) W. V. Kirkwood (CHILDS as GREEN)
- 10) James A. Reider (CHILDS as GREEN)
- 11) Bryan Zbar (CHILDS as CCC Carpentry)
- 12) James C. Potter, Jr. (CHILDS as JOHNSON)

13) Kevin Perkins (CHILDS as JOHNSON)

14) Ron Perkins (CHILDS as JOHNSON)

* 15) Karen Zoltenko (WC Warrant Records Custodian)

3. Charts of benefits and employment

C. Criminal Enterprise - land acquisition:

1) Connie Borsos (Fremont National Bank Records Custodian/TROUT CREEK)

* 2) Glenda L. Martello (Chaffee County Building, Sanitation, and Zoning Records Custodian/TROUT CREEK)

3) Verl Curtis (Building Inspector/TROUT CREEK)

4) Joseph L. Albert (TROUT CREEK)

5) Agnes H. Albert (TROUT CREEK)

6) William Albert (TROUT CREEK)

* 7) Janice Vance (King Soopers Check Cashing/PIERRE/WOODS)

* 8) Harry Moore (Safeway Check Cashing/PIERRE)

* 9) JoAnn Laird (Citadel Bank Records Custodian/WOODS/CHILDS)

* 10) Mary Jean Ciemiewicz (Valley Bank Records Custodian/UPSHUR as RAY WILLIAMS)

* 11) Thomas Ruane (Northern Central Bank Records Custodian/UPSHUR as UPSHUR)

* 12) Laurann Ranker (Norwest Bank, formerly United Bank of Littleton Records/JAMES WILLIAMS/UPSHUR/PSI Business Account)

* 13) Debbie Wilson (Norwest Bank, formerly

United Bank of Colorado Springs/CHILDS as
CCC Carpentry)

14) R. James Trujillo (United Bank of
Littleton Records Custodian/WILLIAMS
as MCCLANE)

15) Debi Medlock (First Interstate Bank of
Englewood Records Custodian/WILLIAMS as
MCCLANE)

II. TAX PHASE:

A. Establish that no returns were filed 1986 through 1990
(Colorado and Pennsylvania Department of Revenue Records)

1. Colorado Department of Revenue records and 1987
federal law change

2. Pennsylvania Department of Revenue records

a. witnesses and applicable evidence

1) Floyd Leonard

2) IRS Agent (to be identified by IRS)

B. Charts of workers' compensation benefits and unreported
income upon which no taxes were paid.

III. RENTAL THEFT PHASE:

A. Establish each rental agreement:

1. Items (including description and value)

2. Terms

3. Identify renter (including vehicles, addresses,
social security number, drivers' license, photographs,
etc.)

B. Theft:

1. Police theft reports

2. Reporting person and circumstances reported

3. Date theft reported (Date of offense)

C. Recovery of equipment:

1. Where recovered - by whom

2. When recovered

3. Circumstances (Equipment in use? For what?)

4. Identification of each item

a. Witnesses and applicable evidence:

1) Carol Delaney
1525 Sherman Street, Suite 700
Denver, Colorado 80203

Ms. Delaney can testify to her participation in the investigation of the FUQRA; to her investigation into the theft of rental property; to her production of a banking records data base; to her participation in a search of Trout Creek Pass; to obtaining toll records, etc. Ms. Delaney's testimony will show that various FUQRA members shared bank accounts and laundered monies through various accounts.

2) Douglas Drace

3) Officer R. Norwell

4) Officer R. Koski

5) Sgt. R.J. Reuteler

6) Off. Elizabeth McDonald

7) Don Hensley

8) Don DeLawter

9) Martin Bruchner

D. Chart showing all rental property theft transactions

IV. FUQRA ORGANIZATION PHASE:

A. Establish that FUQRA was founded by SHEIKH JILANI in approximately 1980 and continues to lead the group:

1. Mohammedan Revelations
2. Islamic Chronicles
3. Video of Jilani introducing "self-defense" training
4. Four videos of Jilani's travels with defendant JAMES WILLIAMS through the United States.

B. Establish Jilani's identity through his purchase of land in Colorado under the alias Mubarick Shaw Shah.

C. Establish FUQRA's goal to purify the Islamic religion through force or violence and the mechanisms by which this has been accomplished.

1. Community activities (living in "baits" and purchase of land in remote areas in over a dozen states)

2. Fund raising activities (including money laundering)

3. Front organizations (Professional Security International, Inc.)

4. Covert activities, e.g.: training FUQRA members as Soldiers of Allah (formerly known as Mohammed Commandos); obtaining weapons; utilizing false identities and living as "incogs" (incognito), surveilling targets, committing terrorist acts, etc.

a. Witnesses and applicable evidence:

1) Clay Forington
3615 S. Elati
Englewood, Colorado 80110

Englewood Police Department Detective Forington can testify to his participation 1985 investigation of the FUQRA in Englewood and to obtaining custody over certain explosive evidence and documents which were produced by said investigation. Detective Forington's testimony will show the arrest of Stephen Paul Paster, his investigative findings relative to FUQRA, and chain of custody of the evidence.

2) Joseph Dempsey
5686 S. Court Place
Littleton, Colorado 80120

Arapahoe County Sheriff's Department Detective Dempsey can testify to his participation 1985 investigation of the FUQRA in Englewood and to obtaining custody over certain documents which were produced by said investigation. Detective Dempsey's testimony will show the chain of custody of the evidence.

3) Steven Strang

4) Dave Malcolm

5) John Greisen
1111 S.W. 2nd Avenue
Portland, Oregon 97204

Portland (Oregon) Police Department Detective Greisen can testify to his investigation of the Rajneesh Hotel attempted bombing in 1983 which occurred in Portland Oregon and to obtaining custody over certain evidence produced by said investigation. Detective Greisen's testimony will show the identification of Stephen Paul Paster as the attempted bombing suspect and his connection to FUQRA, and chain of custody of the evidence.

6) William Carter

7) Pehru Mathai

8) Jane Knowles

9) Beth Meyers

10) William Zeller

11) Stephen Paul Paster

12) Howard Wichter

V. MURDER-ARSON CONSPIRACY PHASE:

A. The locker search:

1. Circumstances
2. Discovery of explosives
3. Discovery of target packages

a. Witnesses and applicable evidence

- 1) Mark Hoffarth
P.O. Box 2169
Colorado Springs, Colorado 80901

Colorado Springs Burglary Division Detective Hoffarth can testify to his investigation of various burglaries which had occurred in Colorado Springs during 1989, leading him to talk with the Astrozon Self-Storage Locker managers about Storage Locker A-3. Detective Hoffarth's testimony will show that, upon the advise of the District Attorney, and acting upon the information provided by the storage locker managers showing the locker to be abandoned, Hoffarth made a warrantless entry into the locker with permission of the managers. Hoffarth learned upon entering Storage Locker A-3 that it was not involved with the burglaries Hoffarth was investigating, but was a storage locker used by the FUQRA, to store targeting packets and explosives, etc.

- 2) Virginia L. Creel
- 3) Charles L. Creel
- 4) Karen Scharff
- 5) Gwen Rapp
- 6) Ronald Rapp
- 7) Karla Hansen
- 8) William Lidh

- 9) Ben Reed
- 10) Richard Reisler
- 11) William H. Matens

B. Investigative Steps - Hare Krishna

1. Contact with Denver Fire Department (learned of 08/01/84 bombing)
2. Victims description (Hare Krishna)
3. Fire Department analysis of evidence
4. Introduction of surveillance notes and after-action report
5. CBI comparison of explosives from locker with photos from firebombing
6. Identity of firebombing authors/planners (handwriting and fingerprints)

a. Witnesses and applicable evidence:

- 1) Joseph V. Sarconi
- 2) Gary Blackman
1331 Cherokee
Denver, Colorado 80204

Denver Police Sgt. Gary Blackman can testify to Denver Police Department Property Room procedures. Sgt. Blackman's testimony will show that the Denver Hare Krishna Temple firebombing evidence was destroyed by the police department in accordance with normal procedures; that the evidence of the nature involved in arsons is usually messy, takes up space, and is potentially dangerous to maintain in storage.

- 3) Gregg Church (aka SARVA)
1400 Cherry Street
Denver, Colorado 80220

Mr. Church can testify to being the Vice President of the

Denver Hare Krishna Temple and knowledgeable about the temple membership and the physical make-up of the building prior and subsequent to the firebombing which took place on August 1, 1984. Mr. Church's testimony will show that various temple members' residences appear in the surveillance photos taken by FUQRA members; the 1421 Cherry Street address housed temple "idol" (deity) cleaner, Priests RAMANYA and SATYASENA; that the peacock feather is worn by deity Krishna and is used in Hare Krishna rites; and can identify the current glass blocks, located at the eastern side of the building on the alley, that replaced the windows through which the bombs were thrown on August 1, 1984--thereby dating the surveillance photos of the temple as being taken prior to the firebombing.

4) Jeff Walker

5) Robert E. Prien

6) Mark L. Smith

7) James Steven Farnsworth

8) RAMANYA

9) Dr. Balige
1400 Cherry Street
Denver, Colorado 80220

Dr. Balige can identify photographs of his residence which were found as part of the Denver Hare Krishna Temple targeting packet and can testify to his attendance at said temple for religious purposes. Dr. Baliges' testimony will show that he was of several individuals targeted for surveillance by JAMES D. WILLIAMS, CURTIS BAYLOR, and other members of FUQRA.

10) Curtis Baylor

11) Edward Nicolas Laurent Flinton

C. Investigative steps - Tucson homicide

1. Contact with Tucson P.D. (learned Khalifa okay)
2. Introduction of surveillance notes and plans (include maps, restaurant notes, photos)
3. Tucson P.D. description of the scene (comparison with written plans)
4. Identity of murder authors/planners (handwriting and fingerprints)

a. Witnesses and applicable evidence:

1) Nicholas J. Giacobbe
P.O. Box 1071
Tucson, Arizona 85702

Tucson Police Department Detective Giacobbe can testify to his participation in the homicide investigation of Rashad Khalifa. Detective Giacobbe's testimony will show that Rashad Khalifa was the victim of a murder which was significantly similar to the murder plans drawn up by JAMES D. WILLIAMS and EDWARD NICOLAS LAURENT FLINTON.

2) Charles Armijo
P.O. Box 1071
Tucson, Arizona 85702

Tucson Police Department Detective Armijo can testify to his participation in the homicide investigation of Rashad Khalifa. Detective Armijo's testimony will show that Rashad Khalifa was the victim of a murder which was significantly similar to the murder plans drawn up by JAMES D. WILLIAMS and EDWARD NICOLAS LAURENT FLINTON.

3) Peter Kouratou

4) Peter Zobenica

5) Dan Birmingham
1801 N. Lamar, Suite 300
Dallas, Texas 75202

Federal Bureau of Investigation Special Agent Birmingham can testify to his participation in the homicide investigation of Rashad Khalifa. Birmingham's testimony will show that he identified Texas FUQRA member Joseph Q. Wall from a photograph of an individual calling himself, Benjamin Phillips--murder suspect in the killing of Rashad Khalifa.

6) Mohammoud A. Abib
745 East Sixth Street
Tucson, Arizona 85702

Mr. Abib can testify to being a member of the Tucson Mosque and friend of murder-victim Rashad Khalifa. Mr. Abib can also testify to Rashad Khalifa's love of mexican food and Khalifa's frequenting the Benneria Guadalajara Restuarant, at 604 - 22nd in Tucson, Arizona. Mr. Abib's testimony will show that JAMES D. WILLIAMS' written reference to said restaurant on a handwritten document, which appears to be a targeting list, reveals that WILLIAMS was linked to the conspiracy to murder Khalifa.

7) Hussein Sayedi

8) Benjamin Edward Phillips

ADDITIONAL MISCELLANEOUS WITNESSES:

- 1) James G. Howell
- 2) William McDougal
- 3) Everett Perdue
- 4) Lou Smit

- 5) Ronald Upshur
- 6) J.P. McCoy
- 7) Tom Gardner
- 8) Chris Buchanan
- 9) Sherry DePree
- 10) Ron Grasse
- 11) Kevin Bonicamp
- 12) Record Custodian
- 13) Richard Williams
- 14) Rick Wallingford
- 15) Bill Davis
- 16) Leroy "J.B." Smith
- 17) Tom Glover
- 18) Roger Lozier
- 19) Douglas Bonnette
- 20) Nick Lovitt
- 21) Sandy Rockensock
- 22) Charles Walser
- 23) Preston Troutman
- 24) Roger Oberhelman
- 25) Jerry Paulino
- 26) David R. Lieberman
- 27) Daron A. Council
- 28) Fred Rihner
- 29) Terry R. Speakes

- 30) Kim Baber
- 31) Rex Wheeler
- 32) Vic Kolenc
- 33) Hastings Michael
- 34)

16. Dr. J. Michael Hoffman
1040 N. Nevada Avenue, Suite 306
Colorado Springs, Colorado 80903

Dr. Hoffman can testify to his examination and comparison of the radiographs (x-rays) of DARY WOODS, VINCENTE RAFAEL PIER (PIERRE), RAYMOND D. WILLIAMS, and JAMES L. UPSHUR, JR. Dr. Hoffman's testimony will show that the radiographs of WOODS and PIER (PIERRE) are of the same individual. Dr. Hoffman's testimony will also show that the radiograph's of WILLIAMS (RAYMOND D.) and UPSHUR are of the same individual.

17. Ken Hommas
1745 Stout Street, Suite 900
Denver, Colorado 80201-0329

United States Postal Inspection Service Technician Hommas can testify to making copies of two videos of the search conducted at Trout Creek Pass on October 8, 1992. Technician Hommas' testimony will show chain of custody of the evidence.

18. James G. Howell
303 N. 7th Street
Canon City, Colorado 81212

Fremont County District Attorney's Office Chief Investigator James G. Howell can testify to his participation in the investigation of the FUQRA.

19. Jane Knowles
648 U.S. Highway 24 South
Buena Vista, Colorado 81211

Ms. Jane Knowles can testify to purchasing realty business from the widow of Jason Meyers. Ms. Knowles testimony will show chain of custody of various land purchase and sale records involving MUBARIK SHAW SHAH (an aka of SHEIKH MUBARIK ALI JILANI). These records will also show that defendants RAYMOND D. WILLIAMS, EDWARD

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IVAN MCGHEEE, JAMES D. WILLIAMS, and others were associated with JILANI--founder and leader of the FUQRA.

20. Peter Kouratou
P.O. Box 1071
Tucson, Arizona 85702

Tucson Police Department Intelligence Division Detective Kouratou can testify to receipt of information concerning the FUQRA, along with copies of the Tucson targeting packet from detectives with the Colorado Springs Police Department in approximately early January 1990. Detective Kouratou's tesimony will show that he personally met with and advised RASHAD KHALIFA of the potential threat against KHALIFA about one week before KHALIFA was killed.

21. Dave Malcolm
40 College Street
Toronto, (Ontario) Canada M5G2 Juliet 3

Metropolitan Toronto Police Department Detective Malcolm can testify to his investigation of the FUQRA in Canada and the arrest of four FUQRA members for the attempted bombing of a Hindu temple and theatre in Toronto in the fall of 1991. Detective Malcolm's testimony will show that several FUQRA members from Texas, conspired with FUQRA members in Canada to plan and carry out acts of violence against Hindus in Canada.

22. Pehru R. Mathai
1525 Sherman Street, Suite 600
Denver, Colorado 80203

Mr. Mathai can testify to his former employment with Dave Cook Sporting Goods during which time Mathai became the target of surveillance by various FUQRA members. Mr. Mathai's testimony will show that he, on occasion, attended ceremonies at the Denver Hare Krishna Temple at 14th and

Cherry. Mr. Mathai's testimony will also show that he was advised by former Denver Police Detective William Carter that photographs of Mathai were found among other evidence at the Astrozon Self-Storage Locker in September 1989 which disclosed that the FUQRA had targeted Mathai.

23. William McDougal
1331 Cherokee
Denver, Colorado 80204

Denver Police Department Lab Officer McDougal can testify
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to his examination of arson/explosive evidence removed from the Denver Hare Krishna Temple crime scene in August 1989 and McDougal's preparation of a report of his findings. Lab Officer McDougal's testimony will show that the fire which caused over \$200,000.00 damage to the temple was caused by incendiary devices and was not the result of accident.

24. Beth Meyers
27250 N. 64th Street, #17
Cave Creek, Arizona 85331

Ms. Meyers can testify to selling her realty business and that of her late husband, Jason Meyers. Ms. Meyers' testimony will show chain of custody of various land purchase and sale records involving MUBARIK SHAW SHAH (an aka of SHEIKH MUBARIK ALI JILANI). These records will also show that defendants RAYMOND D. WILLIAMS, EDWARD IVAN MCGHEEE, JAMES D. WILLIAMS, and others were associated with JILANI--founder and leader of the FUQRA. Ms. Meyers can identify SHAH from photographs of JILANI.

25. Stephen Paul Paster
18 B Upper Mall Scheme
Mier Meer Road
Jilani House
Lahore, Pakistan
Quranic Open University

Mr. Paster is an adversarial witness and can testify to his knowledge of FUQRA activities as they pertain to organizational assignments concerning acts of violence and FUQRA's manufacture and use of explosives.

26. Everett Perdue
P.O. Box 2169
Colorado Springs, Colorado 80901

Colorado Springs Metro Vice, Intelligence, and Narcotics Detective

Sgt. Perdue can testify to his participation in the investigation of the FUQRA and of the surveillance conducted in regard to and arrest of various FUQRA members.

27. Benjamin Edward Phillips
2714 N. Hopi Place, #6
Tucson, Arizona 85705

Mr. PHILLIPS (an aka for JOSEPH Q. WALL) is an adversarial witness and can testify to his knowledge of FUQRA activities as they pertain to organizational assignments concerning acts of violence and FUQRA's

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targeting and murder of FUQRA "enemies."

28. Robert E. Prien
1400 Cherry Street
Denver, Colorado 80220

Mr. Prien can testify to being a member of the Denver Hare Krishna Temple located at 14th and Cherry. Mr. Prien's testimony will show that he was asleep in the temple at the time of the firebombing on August 1, 1984, and had to flee the building to escape being killed in the blaze.

29. RAMANYA
1400 Cherry Street
Denver, Colorado 80220

Priest RAMANYA can testify to being a member of the Denver Hare Krishna Temple. RAMANYA's testimony will show that RAMANYA was a priest responsible for various religious ceremonies at said temple, including cleaning of the Krishna deity. RAMANYA can also testify to residing at 1421 Cherry Street, which is the address written by JAMES D. WILLIAMS on the evidenciary envelope containing a peacock feather.

30. Ben Reed
P.O. Box 2169
Colorado Springs, Colorado 80901

Colorado Springs Police Department Detective Reed can testify to his investigation of the FUQRA and the execution of a search warrant at the Astrozon Self-Storage Locker on September 14, 1989, thereafter, and the chain of custody of evidence. Detective Reed's testimony will show that evidence of explosives and targeting packets were found together in one area of the storage locker, along with other evidence identifying JAMES D. WILLIAMS (aka SAMUEL MCCLANE), JAMES L. UPSHUR, Jr. (aka RAYMOND D. WILLIAMS), EDWARD IVAN MCGHEE

(aka DARYL WOODS), VINCENTE RAFAEL PIERRE, CURTIS BAYLOR,
EDWARD NICOLAS LAURENT FLINTON, etc.

31. Richard Reisler
P.O. Box 2169
Colorado Springs, Colorado 80901

Colorado Springs Police Department Detective Reed can testify to his investigation of the FUQRA and the execution of a search warrant at the Astrozon Self-Storage Locker on September 14, 1989, thereafter, and the chain of custody of evidence. Detective Reed's testimony

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will show that evidence of explosives and targeting packets were found together in one area of the storage locker, along with other evidence identifying JAMES D. WILLIAMS (aka SAMUEL MCCLANE), JAMES L. UPSHUR, Jr. (aka RAYMOND D. WILLIAMS), EDWARD IVAN MCGHEE (aka DARYL WOODS), VINCENTE RAFAEL PIERRE, CURTIS BAYLOR, EDWARD NICOLAS LAURENT FLINTON, etc.

32. Joseph V. Sarconi
745 W. Colfax Avenue
Denver, Colorado 80204

Denver Fire Department Arson Squad Lt. Joseph Sarconi can testify to the Denver Fire Department records concerning the August 1, 1984 firebombing of the Denver Hare Krishna Temple. Lt. Sarconi's testimony (original investigator deceased as of November 1992) will show that the arson investigation findings revealed that an incendiary device was the cause of the blaze that engulfed the altar room of the temple; that two temple members were in the temple at the time of the blaze; and that a targeting packet describing the temple firebombing replicated the firebombing events as they actually occurred.

33. Hussein Sayedi
745 East Sixth Street
Tucson, Arizona 85702

Mr. Sayedi can testify to being a member of the Tucson Mosque and friend of murder-victim Rashad Khalifa. Mr. Sayedi can also testify to Rashad Khalifa's love of Mexican food and Khalifa's frequenting the Benneria Guadalajara Restaurant, at 604 - 22nd in Tucson, Arizona. Mr. Sayedi's testimony will show that JAMES D. WILLIAMS' written reference to said restaurant on a handwritten document, which appeared to be a targeting list, reveals that WILLIAMS was linked to the conspiracy to murder Khalifa.

34. Lou Smit
326 South Tejon, Suite 110
Colorado Springs, Colorado 80903

El Paso County District Attorney's Investigator Smit can testify to assisting Investigator Susan Fenger in the execution of a search warrant at the Norwest Bank of Colorado Springs.

35. Mark L. Smith
1400 Cherry Street
Denver, Colorado 80220

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Mr. Smith can testify to being a member of the Denver Hare Krishna Temple located at 14th and Cherry. Mr. Smith's testimony will show that he was asleep in the temple at the time of the firebombing on August 1, 1984, and had to flee the building to escape being killed in the blaze.

36. Steven Strang
1200 promenade Vanier
Ottawa (Ontario) Canada K1A OR2

Canadian Mounted Police Criminal Intelligence Specialist Steven Strang can testify to his participation in the investigation of the FUQRA in Canada. Specialist Strang's testimony will show that several FUQRA members from Texas, conspired with FUQRA members in Canada to plan and carry out acts of violence against Hindus in Canada and that various FUQRA writings reflect that SHEIKH JILANI motivated his followers into committing acts of violence.

37. Dr. Douglas Ubelaker
Smithsonian Institution
Department of Anthropology
Washington D.C. 20560

Dr. Ubelaker can testify to his examination and comparison of the radiographs (x-rays) of DARY WOODS, VINCENTE RAFAEL PIER (PIERRE), RAYMOND D. WILLIAMS, and JAMES L. UPSHUR, JR. Dr. Ubelaker's testimony will show that the radiographs of WOODS and PIER (PIERRE) are of the same individual. Dr. Ubelaker's testimony will also show that the radiograph's of WILLIAMS (RAYMOND D.) and UPSHUR are of the same individual and that both post mortem radiographic comparison, as well as pre mortem radiographic comparison is a science.

38. Ronald D. Upshur

521 Sixth Avenue
Williamsport, Pennsylvania 17701

Mr. UPSHUR is an adversarial witness and can testify to his knowledge of FUQRA activities as they pertain to organizational assignments concerning acts of violence and FUQRA's manufacture and use of explosives. Mr. UPSHUR's testimony will show that JAMES D. WILLIAMS wrote him a letter and later requested UPSHUR to obtain fuse in the Spring of 1984.

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39. Howard Wichter
42 Inverness Drive East
Englewood, Colorado 80112

Buckley Powder Company manager, Mr. Wichter, can testify to the availability of black powder and other explosive components during the period of 1983 and 1984. Mr. Wichter's testimony will show that black powder was readily available at sporting goods stores and that other explosive components were, for the most part, available in Colorado through two major distributors (investigator Susan Fenger can testify that Emerick and Hill and Buckley Powder Company records showed no purchases of explosives by known FUQRA members).

40. Robert Witt
10th and Pennsylvania Avenue N. W.
Washington D.C. 20535

Federal Bureau of Investigation Lab Agent Witt can testify to his examination of the Tucson targeting packet documents for latent fingerprints. Lab Agent Witt's testimony will show that he identified the fingerprint of JAMES D. WILLIAMS appearing the Phoenix map which was a part of the Tucson targeting packet.

41. William H. Zeller
P.O. Drawer W-2
Wickenburg, Arizona 85358

Mr. Zeller can testify to his sale of fuse and weapons through a mail order business. Mr. Zeller can identify the fuse packing slip he used in his sales as being the same slip found among other explosives items at the Astrozon Self Storage Locker.

42. Peter Zobenica
Room 8 - V
Federal Building
301 W. Congress
Tucson, Arizona 85701

Federal Bureau of Investigation Special Agent Zobenica can testify to his participation in the homicide investigation of Rashad Khalifa. Zobenica's testimony will show identification of Texas FUQRA member Joseph Q. Wall from a photograph of an individual calling himself, Benjamin Phillips--murder suspect in the killing of Rashad Khalifa and chain of custody of the original Tucson targeting packet.

OTHER: