

- 1 Q. MR. PATRICK, WHERE DID YOU GET THE MONEY TO PRODUCE THIS
2 FILM?
- 3 A. FROM DRUG PROCEEDS.
- 4 Q. WERE THEY YOUR DRUG PROCEEDS?
- 5 A. BOTH OF OURS.
- 6 Q. HOW MUCH DID YOU INVEST?
- 7 A. ROUGHLY BOTH OF US INVESTED ABOUT \$25,000 APIECE.
- 8 Q. AND WHAT WAS THE NAME OF THE BUSINESS?
- 9 A. DARLICK'S PRODUCTION.
- 10 Q. MR. PATRICK, DID THERE COME A TIME WHEN YOU MET GEORGE AND
11 VIRGINIA HIGH?
- 12 A. YES.
- 13 Q. HOW DID YOU MEET GEORGE AND VIRGINIA HIGH?
- 14 A. THROUGH DAVID WALLACE.
- 15 Q. WHERE DID YOU MEET GEORGE AND VIRGINIA HIGH?
- 16 A. AT THEIR FIRST OFFICE, I CAN'T REMEMBER THE STREET.
- 17 Q. WHAT WAS THE PURPOSE IN YOUR MEETING GEORGE AND VIRGINIA
18 HIGH?
- 19 A. TO BUY A HOUSE.
- 20 Q. DID YOU LOOK AT A HOUSE?
- 21 A. YES, SEVERAL.
- 22 Q. DID YOU EVER AUTHORIZE THE PURCHASE OF A HOUSE?
- 23 A. NO.
- 24 Q. LET ME FIRST SHOW YOU GOVERNMENT EXHIBIT 173-S-1, AND ASK
25 YOU, SIR, IF YOU RECOGNIZE THE HOUSE DEPICTED IN THAT

- 1 PHOTOGRAPH?
- 2 A. YES.
- 3 Q. HOW IS IT YOU RECOGNIZE THAT?
- 4 A. THIS IS THE HOUSE I WAS CONSIDERING.
- 5 Q. HOW FAR ALONG IN THE PROCESS OF BUYING THIS HOUSE DID YOU
- 6 GET?
- 7 A. AS FAR AS GOING AND GETTING THE MONEY TOGETHER AND GIVING
- 8 IT TO MRS. HIGH.
- 9 Q. TELL US ABOUT THAT. HOW MUCH MONEY DID YOU GET TOGETHER?
- 10 A. ABOUT \$75,000.
- 11 Q. IN WHAT FORM DID YOU GET \$75,000?
- 12 A. IN WHAT DENOMINATIONS? HUNDREDS AND TWENTIES.
- 13 Q. CASH OR CHECK?
- 14 A. CASH.
- 15 Q. HOW DID YOU HAVE THE \$75,000 IN CASH PACKAGED?
- 16 A. IN A BRIEFCASE.
- 17 Q. WHAT DID YOU DO WITH IT?
- 18 A. TOOK IT TO MRS. HIGH'S OFFICE.
- 19 Q. AND DID YOU GIVE IT TO SOMEONE?
- 20 A. MRS. HIGH.
- 21 Q. ON THAT DAY, WHEN YOU GAVE HER THE MONEY, HAD YOU SIGNED
- 22 ANY KIND OF CONTRACT TO BUY A HOUSE?
- 23 A. NO, NOT THAT I CAN REMEMBER.
- 24 Q. LET ME SHOW YOU GOVERNMENT'S 173-S-2, AND DIRECT YOUR
- 25 ATTENTION TO THE LAST PAGE AND ASK, YOU, SIR, IF THAT SIGNATURE

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- 1 IS YOURS?
- 2 A. IT HAS TO BE.
- 3 Q. WHAT NAME IS ON THERE?
- 4 A. LARSETT LYONS.
- 5 Q. IS THAT HANDWRITTEN?
- 6 A. YES.
- 7 Q. DID YOU WRITE LARSETT LYONS?
- 8 A. YES.
- 9 Q. WHO IS LARSETT LYONS?
- 10 A. MY MOTHER.
- 11 Q. DID YOU BUY THE HOUSE?
- 12 A. NO.
- 13 Q. HOW LONG AFTER YOU WENT AND TOOK THE MONEY TO MRS. HIGH
- 14 DID YOU DECIDE NOT TO BUY THE HOUSE?
- 15 A. MAYBE A WEEK OR TWO LATER.
- 16 Q. WHAT HAPPENED?
- 17 A. I JUST CHANGED MY MIND.
- 18 Q. SO WHAT HAPPENED? DID YOU GET YOUR MONEY BACK?
- 19 A. YES.
- 20 Q. TELL US HOW YOU GOT YOUR MONEY BACK.
- 21 A. I WENT BACK TO THEIR OFFICE AND PICKED IT UP.
- 22 Q. NOW, WHEN YOU HAD FIRST DELIVERED THE BRIEFCASE HAD YOU
- 23 OPENED IT?
- 24 A. NO.
- 25 Q. WITH MRS. HIGH?

- 1 A. NO.
- 2 Q. WAS THERE ANY IDEA HOW MUCH MONEY WAS IN THE BRIEFCASE?
- 3 DID YOU KNOW HOW MUCH WAS THERE?
- 4 A. YES.
- 5 Q. DID YOU EVER COUNT THE MONEY IN HER PRESENCE?
- 6 A. NO.
- 7 Q. DID SHE EVEN KNOW THERE WAS MONEY IN THE BRIEFCASE?
- 8 A. YES.
- 9 Q. HOW DO YOU KNOW THAT?
- 10 A. I TOLD HER.
- 11 Q. WHEN YOU PICKED THE MONEY UP, WAS THE MONEY JUST AS YOU
- 12 HAD DELIVERED IT TO HER?
- 13 A. YES.
- 14 Q. HOW LONG DID YOU REMAIN IN LOS ANGELES, MR. PATRICK?
- 15 A. ABOUT TEN, ELEVEN MONTHS.
- 16 Q. AND DID THERE COME A TIME WHEN YOU LEFT LOS ANGELES?
- 17 A. YES.
- 18 Q. WHERE DID YOU GO?
- 19 A. TO ATLANTA, BACK HERE.
- 20 Q. WHEN YOU CAME BACK TO ATLANTA CAN YOU TELL US WHAT
- 21 OCCURRED?
- 22 A. I MET SLICK AGAIN TO BRING ME BACK ONE OF THE CARS I SOLD
- 23 AL, AND HE BROUGHT SOME DOPE.
- 24 Q. WHICH CAR -- YOU ARE REFERRING TO WHICH CAR?
- 25 A. THE MAXIMA.

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- 1 Q. WHAT DID YOU ASK SLICK TO DO WITH THE MAXIMA?
- 2 A. HE BROUGHT IT AND GAVE IT BACK TO ME WITH SOME DOPE IN IT.
- 3 Q. HOW MUCH COCAINE WAS IN THE MAXIMA?
- 4 A. FIVE KILOS.
- 5 Q. DID YOU HAVE ANY FURTHER CONTACT WITH MR. GRACIA OR WITH
- 6 SLICK?
- 7 A. YES. ABOUT A WEEK LATER HE CAME BACK AGAIN WITH TEN MORE
- 8 KILOS.
- 9 Q. DURING THE TIME THAT YOU KNEW MR. GRACIA, WHAT WAS HIS
- 10 RELATIONSHIP TO SLICK?
- 11 A. THEY WERE FRIENDS.
- 12 Q. WHO GAVE THE ORDERS BETWEEN THE TWO OF THEM?
- 13 A. AL.
- 14 Q. MR. PATRICK, IN THE COURSE OF THE TIME YOU DEALT WITH MR.
- 15 GRACIA DID YOU MEET A MAN BY THE NAME OF ROBERT WARD?
- 16 A. NO.
- 17 Q. DID MR. GRACIA EVER TALK WITH YOU OF ROBERT WARD?
- 18 A. YES.
- 19 Q. WHAT DID MR. GRACIA SAY?
- 20 A. HE SAID HE WAS A FRIEND OF THE FAMILY'S AND HE HAD A
- 21 COUPLE OF CARS IN HIS NAME.
- 22 Q. DID MR. GRACIA EVER INDICATE TO YOU WHICH CARS WERE IN MR.
- 23 WARD'S NAME?
- 24 A. YES.
- 25 Q. WHICH ONES?

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1 A. HE HAD A 560, THE ONE IN THE PICTURE, A 560SEC WITH
2 VIRGINIA TAGS, AND AN INFINITY Q45.

3 MR. MOYE: MAY I HAVE JUST A MOMENT, YOUR HONOR?

4 THE COURT: ALL RIGHT.

5 BY MR. MOYE:

6 Q. MR. PATRICK, DO YOU SEE THE AL OR ALEX GRACIA THAT YOU
7 HAVE BEEN TALKING ABOUT IN THE COURTROOM?

8 A. YES.

9 Q. WOULD YOU IDENTIFY HIM FOR THE RECORD?

10 A. BLACK FEMALE -- BLACK MALE, EXCUSE ME, OLIVE GREEN SUIT,
11 COLORED NECKTIE SITTING NEXT TO MR. STEVE ROSEN.

12 MR. MOYE: YOUR HONOR, MAY THE RECORD REFLECT THE
13 WITNESS HAS IDENTIFIED THE DEFENDANT, ALEX GRACIA?

14 THE COURT: ALL RIGHT.

15 BY MR. MOYE:

16 Q. DO YOU SEE THE VIRGINIA HIGH YOU DEALT WITH?

17 A. YES.

18 Q. WOULD YOU IDENTIFY HER FOR THE RECORD?

19 A. BLACK FEMALE, BLACK COAT, BLACK BLOUSE WITH WHITE DOTS ON
20 IT.

21 MR. MOYE: YOUR HONOR, MAY THE RECORD REFLECT THE
22 WITNESS HAS IDENTIFIED THE DEFENDANT, VIRGINIA HIGH?

23 THE COURT: ALL RIGHT.

24 BY MR. MOYE:

25 Q. MR. PATRICK, DO YOU SEE MR. GEORGE HIGH IN THE COURTROOM?

1 A. YES.

2 Q. WOULD YOU IDENTIFY HIM FOR THE RECORD?

3 A. BLACK MALE, GREY SUIT, CHAMPAGNE COLORED NECKTIE WITH
4 BLACK DOTS.

5 MR. MOYE: YOUR HONOR, MAY THE RECORD REFLECT THE
6 WITNESS HAS IDENTIFIED THE DEFENDANT, GEORGE HIGH?

7 THE COURT: ALL RIGHT.

8 MR. MOYE: THOSE ARE MY QUESTIONS ON DIRECT
9 EXAMINATION, YOUR HONOR.

10 THE COURT: MR. MORRISON?

11 CROSS-EXAMINATION

12 BY MR. MORRISON:

13 Q. MR. PATRICK, THE TIMES THAT YOU MET WITH THE HIGHS, WHAT
14 YEAR WAS THAT?

15 A. 1990.

16 Q. HOW MANY TIMES DID YOU SEE MR. GEORGE HIGH?

17 A. APPROXIMATELY MAYBE FIVE, SIX TIMES.

18 Q. ALL OF THOSE TIMES INVOLVED SHOWING YOU HOUSES?

19 A. YES.

20 Q. NOW, THERE CAME A TIME WHERE YOU ACQUIRED SOME MONEY
21 THROUGH INHERITANCE?

22 A. NO.

23 Q. DID YOU GET SOME MONEY FROM YOUR GRANDMOTHER?

24 A. NO.

25 Q. HOW ABOUT FROM YOUR GRANDFATHER?

1 A. NO.

2 Q. DID YOU GET ANY MONEY FROM AN INSURANCE SETTLEMENT IN AN
3 ACCIDENT?

4 A. YES.

5 Q. MR. PATRICK, IN 1990 DID YOU, OTHER THAN FROM DRUG
6 PROCEEDS, HAVE OCCASION TO ACQUIRE \$55,000?

7 A. NO.

8 Q. AND HOW ABOUT IN 1991, DID YOU HAVE OCCASION TO ACQUIRE
9 \$100,000?

10 A. NO.

11 Q. YOU DIDN'T RECEIVE ANY MONEY FROM YOUR GRANDMOTHER OR YOUR
12 GRANDFATHER IN EITHER 1990 OR '91.

13 A. NO.

14 Q. IN ANY FASHION, WHETHER BY INHERITANCE OR NOT?

15 A. NO.

16 Q. MR. PATRICK, DO YOU REMEMBER IN JANUARY OF 1993 BEING
17 INTERVIEWED IN MEMPHIS, TENNESSEE BY SPECIAL AGENT BRYAN
18 CHAMBERS?

19 A. YES.

20 Q. I DON'T HAVE A PAGE NUMBER, BUT IT'S THE NEXT TO THE LAST
21 PAGE.

22 WAS THERE ALSO PRESENT A SPECIAL AGENT BY THE NAME OF
23 ROBERT JOHNSON?

24 A. YES.

25 Q. DO YOU REMEMBER MR. JOHNSON ASKING YOU ABOUT AN INSURANCE

- 1 SETTLEMENT?
- 2 A. YES.
- 3 Q. AND HE ASKED YOU HOW MUCH THE SETTLEMENT WAS AND YOU SAID
- 4 I GOT ABOUT \$9,000?
- 5 A. YES.
- 6 Q. YOU ALSO REMEMBER HIM ASKING YOU, HE SAID IN JANUARY OF
- 7 1990 YOU RECEIVED \$55,000 FROM FREEMAN AND BONITA?
- 8 A. YES.
- 9 Q. DO YOU REMEMBER WHAT YOUR RESPONSE WAS TO THAT QUESTION?
- 10 A. YES.
- 11 Q. WHAT WAS YOUR RESPONSE?
- 12 A. I TOLD HIM YES.
- 13 Q. YOU RECEIVED \$55,000 FROM THEM?
- 14 A. I TOLD THEM THAT.
- 15 Q. WAS THAT TRUE?
- 16 A. NO.
- 17 Q. SO YOU LIED TO THE AGENTS?
- 18 A. YES.
- 19 Q. NOW, AGAIN HE ASKED YOU ANOTHER QUESTION ABOUT \$100,000
- 20 WHERE YOU GOT THAT?
- 21 A. YES.
- 22 Q. AND I TAKE IT YOU ANSWERED TO HIM YOU GOT \$100,000?
- 23 A. YES.
- 24 Q. AND YOU LIED ABOUT THAT?
- 25 A. YES.

- 1 Q. NOW, WHEN YOU WERE TALKING TO THESE AGENTS, IN WHAT
2 CONTEXT WERE YOU TALKING WITH THEM?
- 3 A. WHAT DO YOU MEAN?
- 4 Q. WHY WERE YOU THERE TALKING TO THESE AGENTS ON THE 21ST OF
5 JANUARY 1993?
- 6 A. TRYING TO GET A BOND.
- 7 Q. NOW, YOU KNEW AT THAT TIME THAT LYING TO THOSE AGENTS WAS
8 A CRIME IN AND OF ITSELF?
- 9 A. NO.
- 10 Q. YOU DIDN'T KNOW LYING TO A FEDERAL AGENT WAS A CRIME?
- 11 A. NO.
- 12 Q. YOU WERE LYING TO GET A BOND?
- 13 A. YES.
- 14 Q. AT THAT POINT IN TIME WAS MONEY MORE IMPORTANT TO YOU THAN
15 YOUR LIBERTY?
- 16 A. NO.
- 17 Q. SO YOUR LIBERTY IS MORE IMPORTANT TO YOU THAN MONEY?
- 18 A. NO -- YES.
- 19 Q. AND YOU LIED AT THAT POINT TO THOSE AGENTS. HAVE YOU LIED
20 ANY IN YOUR TESTIMONY TODAY?
- 21 A. NO.
- 22 Q. DID YOU LIE AT ANY OTHER TIME WHEN YOU WERE INTERVIEWED BY
23 AGENTS?
- 24 A. NO.
- 25 Q. SO THAT IS THE ONLY TIME IN YOUR CAREER, SO TO SPEAK, THAT

- 1 YOU HAVE LIED KNOWINGLY TO FEDERAL AGENTS?
- 2 A. WHAT DO YOU MEAN CAREER?
- 3 Q. LET ME LIMIT IT TO THE PERIOD '87 THROUGH 1992.
- 4 A. YES.
- 5 Q. NOW, PART OF YOUR JOB AS A DRUG DEALER, THAT WAS LIVING A
6 LIE TO THE PUBLIC, WAS IT NOT?
- 7 A. NO.
- 8 Q. YOU WANTED TO MAKE SURE THAT CERTAIN PEOPLE KNEW THAT YOU
9 WERE A DRUG DEALER AND CERTAIN PEOPLE DIDN'T; IS THAT CORRECT?
- 10 A. THAT IS CORRECT.
- 11 Q. NOW, THE TIMES THAT YOU MET MR. AND MRS. HIGH, DO YOU KNOW
12 REMEMBER WHAT KIND OF VEHICLE YOU WERE IN?
- 13 A. MAYBE ONE I CAN REMEMBER.
- 14 Q. WHAT KIND OF CAR WAS IT?
- 15 A. I WAS DRIVING A 1990 RANGE ROVER.
- 16 Q. YOU WERE IN A RANGE ROVER?
- 17 A. YES.
- 18 Q. WERE YOU BY YOURSELF WHEN YOU WENT TO VISIT THEM?
- 19 A. MAYBE ONE OR TWO OCCASIONS I WAS.
- 20 Q. NOW, DID YOU TELL EITHER GEORGE OR VIRGINIA HIGH YOU WERE
21 A DRUG DEALER?
- 22 A. NO.
- 23 Q. DID YOU EVER COMMIT OR PARTICIPATE IN ANY DRUG
24 TRANSACTIONS IN THEIR PRESENCE?
- 25 A. NO.

1 Q. DID YOU EVER HAVE ANY DRUGS IN THEIR PRESENCE?

2 A. NO.

3 Q. NOW, THE TIME YOU SAY YOU MET WITH VIRGINIA HIGH AND YOU
4 TOOK A BRIEFCASE WITH MONEY IN IT?

5 A. YES.

6 Q. IF I COULD, COULD I SEE THAT CONTRACT?

7 BY THE WAY, WHEN YOUR MOTHER SIGNED THE LEASE FOR
8 THE CONDOMINIUM OVER ON LENOX ROAD, SHE KNEW SHE WAS NOT GOING
9 TO LIVE THERE, DIDN'T SHE?

10 A. YES.

11 Q. SO SHE HELPED PARTICIPATE IN YOUR DRUG DEALING WITH YOU TO
12 THAT EXTENT?

13 A. NO.

14 Q. YOUR MOTHER JUST SIGNED IT BECAUSE YOU ASKED HER TO?

15 A. THAT IS CORRECT.

16 Q. AND I TAKE IT THE SAME THING ON THIS CONTRACT THAT IS
17 SIGNED BY HER, TOO, YOU HAD YOUR MOTHER SIGN THIS?

18 A. I SIGNED THAT ONE.

19 Q. THIS IS YOUR SIGNATURE?

20 A. THAT IS CORRECT.

21 Q. WHERE WERE YOU WHEN YOU SIGNED THIS?

22 A. I CAN'T REMEMBER. I DIDN'T EVEN REMEMBER THAT I HAD
23 SIGNED THAT.

24 Q. NOW, WAS GEORGE HIGH PRESENT WHEN YOU LEFT THE MONEY?

25 A. NO.

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1 Q. AND YOU SAID THE MONEY WAS IN EXACTLY THE SAME FORM WHEN
2 YOU GOT IT BACK AS IT WAS WHEN YOU LEFT IT?

3 A. THAT IS CORRECT.

4 Q. IN FACT, YOU DON'T EVEN KNOW FOR SURE WHETHER OR NOT THAT
5 BRIEFCASE WAS OPENED, DO YOU?

6 A. THAT IS CORRECT.

7 MR. MORRISON: THANK YOU. THAT'S ALL I HAVE.

8 THE COURT: MR. ABBOTT?

9 CROSS-EXAMINATION

10 BY MR. ABBOTT:

11 Q. VERY BRIEFLY, MR. PATRICK. DO I UNDERSTAND GEORGE HIGH
12 SHOWED YOU SOME HOUSES?

13 A. YES.

14 Q. INCLUDING THE ONE THAT YOU THOUGHT ABOUT BUYING AND
15 BROUGHT IN SOME MONEY ON?

16 A. YES.

17 Q. AND THEN YOU BROUGHT SOME MONEY TO THE OFFICE IN A
18 BRIEFCASE! IS THAT CORRECT?

19 A. THAT IS CORRECT.

20 Q. YOU GAVE IT TO MRS. HIGH?

21 A. MRS. HIGH.

22 Q. DID YOU GET A RECEIPT FOR IT?

23 A. NO.

24 Q. AND YOU DIDN'T OPEN IT?

25 A. (SHAKES HIS HEAD NEGATIVELY.)

1 Q. YOU DIDN'T COUNT IT?

2 A. NO.

3 Q. YOU LEFT IT THERE FOR TWO WEEKS?

4 A. YES.

5 Q. AND WHEN YOU CAME BACK AND PICKED IT UP, IT WAS JUST LIKE
6 IT WAS WHEN YOU LEFT IT?

7 A. JUST LIKE IT WAS WHEN I LEFT.

8 MR. ABBOTT: ALL RIGHT. THANK YOU VERY MUCH.

9 THE COURT: YOU CAN WAIT UNTIL IN THE MORNING.

10 MR. AXAM.

11 I DON'T WANT YOU TO HAVE TO RUSH. I FIGURED YOURS
12 WILL BE THE LONGEST.

13 CROSS-EXAMINATION

14 BY MR. AXAM:

15 Q. SO WE CAN BE SURE, WHEN YOU WERE ASKED ABOUT EVERYBODY,
16 YOU DON'T RECOGNIZE ROBERT WARD, JR., DO YOU?

17 A. NO.

18 Q. YOU NEVER MET HIM?

19 A. NO.

20 Q. THE CAR MAN, DO YOU KNOW WHO THEY CONSIDERED TO BE THE CAR
21 MAN? WAS KYLE HENRY THE CAR MAN?

22 A. YES.

23 Q. THAT IS WHAT HIS TITLE WAS?

24 A. YES.

25 Q. HE WOULD BE INTRODUCED AS KYLE HENRY, THE CAR MAN?