CAUSE NO. 96-CR-0549-A

THE STATE OF TEXOMA, Prosecution,	§ § §	CRIMINAL DISTRICT COURT
VS.	§ §	IN AND FOR
DORIAN CRAIG, Defendant.	§ §	PETRO COUNTY, TEXOMA

CASE MATERIALS

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If **material** questions concerning this case arise, submit questions *in writing* to State Mock Trial Coordinator at FAX # 214/220-7465 or 2101 Ross Avenue, Dallas, Texas 75201.

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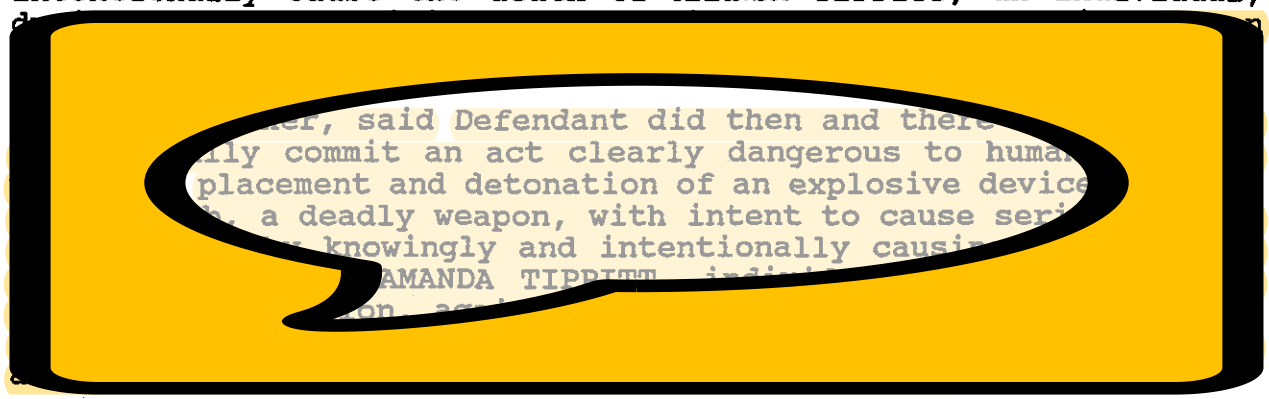
STATEMENT OF STIPULATED FACTS

I.

The Defendant, DORIAN CRAIG, has been charged by indictment with the murder of CHRIS MONNING and the murder of AMANDA TIPPITT. The Defendant is not being tried at this time for the murder of TONY TIPPITT. The Defendant will be tried for the offense of capital murder with the Prosecution seeking the death penalty.

The True Bill of Indictment reads as follows:

In the name and by the authority of the State of Texoma, the Grand Jury of Petro County, State of Texoma, duly elected, empaneled, sworn and charged to inquire of offenses committed within said County, upon their oaths do present in and to the District Court of Petro County, at the October Term, A.D., 1996, that one, DORIAN CRAIG, Defendant, on or about the 11th day of October, A.D. 1996, in the County of Petro and the State of Texoma, did unlawfully then and there knowingly and intentionally cause the death of CHRIS MONNING, an individual, and did knowingly and intentionally cause the death of AMANDA TIPPITT, an individual,



II.

DORIAN CRAIG gave a voluntary statement to Investigator Devon Wayne, special investigator with the Petro City Police Department. Craig's State and Federal Constitutional rights, including the right against self-incrimination, right to counsel, and right to due process of law are not at issue. It is stipulated that DORIAN CRAIG was advised of all Miranda rights prior to giving the written statement to Investigator Devon Wayne.

III.

The Prosecution Report was prepared by Investigator Devon Wayne. All exhibits included in the case materials are authentic and are accurate in all respects. No objections to the authenticity of the exhibits will be entertained. The only exhibits to be used at trial are those included in the case packet. The signatures on the witness statements and on all other documents are authentic.

IV.

The State of Texoma must prove the following to sustain its burden of proof that Dorian Craig is guilty of capital murder as charged:

(1) that Chris Monning and Amanda Tippitt were living, breathing individuals on or about October 11, 1996;
(2) that the detonation of the explosive device planted by the Defendant caused the death of Chris Monning and the death of Amanda Tippitt;
(3) that the causes of death of Chris Monning and Amanda Tippitt were wounds and injuries that they received as a result of the detonation of the explosive device, to wit: a pipe bomb;
(4) that the death of Chris Monning and the death of Amanda Tippitt occurred during the same transaction in the County of Petro, State of Texoma;
(5) that the Defendant either knowingly and intentionally caused the death of Chris Monning and Amanda Tippitt, as the terms knowingly and intentionally are defined herein, or that the Defendant did knowingly and intentionally commit an act clearly dangerous to human life, with intent to cause serious bodily injury or death, that caused the death of Chris Monning and Amanda Tippitt.

Elements 1, 2, 3, and 4 listed above are a part of the Stipulated Facts and, therefore, are not in dispute.

V.

The following instructions will be submitted to the jury:

(1) All persons are presumed to be innocent and no person may be convicted of an offense unless each element of the offense is proved beyond a reasonable doubt. The fact that a person has been arrested, confined, or indicted for, or otherwise charged with, an offense gives rise to no inference of guilt at his trial. The law does not require a Defendant to prove his innocence or produce any evidence at all. The presumption of innocence alone is sufficient to acquit the Defendant unless the jurors are satisfied beyond a reasonable doubt of the Defendant's guilt after careful and impartial consideration of all the evidence in the case.

(2) The prosecution has the burden of proving the Defendant guilty and it must do so by proving each and every element of the offense charged beyond a reasonable doubt and if it fails to do so, you must acquit the Defendant. It is not required that the prosecution prove guilt beyond all possible doubt; it is required that the prosecution's proof excludes all "reasonable doubt" concerning the Defendant's guilt. A "reasonable doubt" is a doubt based on reason and common sense after a careful and impartial consideration of all the evidence in the case. It is the kind of doubt that would make a reasonable person hesitate to act in the most important of his own affairs. Proof beyond a reasonable doubt, therefore, must be proof of such a convincing character that you would be willing to rely and act upon it without hesitation in the most important of your own affairs.

(3) If you have a reasonable doubt as to the Defendant's guilt after considering all of the credible evidence before you, and these instructions, you will acquit the Defendant and say by your verdict, "not guilty."

(4) A person acts intentionally, or with intent, with respect to the nature of his conduct or to a result of his conduct when it is his conscious objective or desire to engage in the conduct or cause the result.

(5) A person acts knowingly, or with knowledge, with respect to the nature of his conduct or to circumstances surrounding his conduct when he is aware of the nature of his conduct or that the circumstances exist. A person acts knowingly, or with knowledge, with respect to a result of his conduct when he is aware that his conduct is reasonably certain to cause the result.

VI.

An explosive device, to wit: a pipe bomb, is a deadly weapon.

VII.

Investigator Devon Wayne, Morgan Abernathy, and Berkeley Craig are to be called by the Prosecution. Casey Swanson, Rosh Billon, and Dorian Craig are to be called by the Defense.

VIII.

The following pertinent provisions of the Texoma Penal Code are also to be submitted to the jury as a part of the Court's charge:

MURDER - Sec. 19.02, Texoma Penal Code

A person commits an offense if he:

(a) Intentionally or knowingly causes the death of an individual; or

(b) Intends to cause serious bodily injury and commits an act clearly dangerous to human life that causes the death of an individual.

CAPITAL MURDER - Sec. 19.03, Texoma Penal Code

(a) A person commits an offense if he commits murder as previously defined under Sec. 19.02 (a) or (b) and, the person causes the death of more than one person during the same criminal transaction.

(b) An offense under this section is a capital felony.

MISTAKE OF FACT - Sec. 8.02, Texoma Penal Code

It is a defense to prosecution that the actor through mistake formed a reasonable belief about a matter of fact if his mistaken belief negated the kind of culpability required for the commission of the offense.

DURESS - Sec. 8.05, Texoma Penal Code

(a) It is an affirmative defense to prosecution that the actor engaged in the proscribed conduct because he was compelled to do so by threat of imminent death or serious bodily injury to himself or another.

(b) Compulsion within the meaning of this section exists only if the force or threat of force would render a person of reasonable firmness incapable of resisting the pressure.

(c) The defense provided by this section is unavailable if the actor intentionally, knowingly or recklessly placed himself in a situation in which it was probable that he would be subjected to compulsion.

(d) If the defense is raised under this section of the Texoma Penal Code, the prosecution must disprove the defense beyond a reasonable doubt.

The defense of necessity is not available under the Texoma Penal Code. There are no lesser included offenses and none may be argued by either side.

IX.

The Charge of the Court is accurate in all respects; and no objections to the Charge will be entertained.

X.

This case will be tried to a jury.

XI.

The jury will be submitted the following verdict forms:

We the jury find the Defendant guilty of the offense of capital murder as alleged in the indictment; or

We the jury find the Defendant not guilty.

Respectfully submitted,

_____
Attorney for the State

_____
Attorney for the Defendant

FACT STATEMENT OF MORGAN ABERNATHY

My name is Morgan Abernathy. I am 19 years old and I live at 1206 Broyles Avenue in Petro City. I moved to Petro City seven years ago from Philadelphia with my dad and sister. I quit school in the 10th grade. I'm unemployed right now, but I used to work off and on doing odd jobs for some folks in my neighborhood. Before that, I worked at a furniture store, but got laid off. I'm now studying for my GED and taking care of Mimi, my grandmother during the day. My sister, Kate, is 14 and is in 8th grade at Felske Middle School. My dad works at Madison Savings & Loan.

Three years ago, I started hanging out with a gang here in Petro City called the CUZ'NS. I knew a lot of the gang members from school and I used to hang on the fringes of the group, just to be cool. After a while they told me if I wanted protection, I'd better get "affiliated" before it was too late. I was kind of scared to join but more scared not to. Besides, they told me I could make some real money if I hooked up with them. I just wanted to get me enough to move back to Philly. But a few weeks into it, I found out the CUZ'NS considered this a permanent affiliation. When I was still a wannabe, they had me doing little jobs like minor shoplifting at the mall or looking for the law while they hot-wired cars and stuff like that. Nothing real big though--at least not a first. My tag was "Mo-Better."

Then the time came for me to join up for real. The rules were clear. You don't become a member of the CUZ'NS without doing what the leaders tell you to do and you don't stop being a CUZ'N 'til you die. Before they'd let me in, I was told I had to steal a car from an old man or old lady and to make sure I left some marks on them. When I said that no, I can't roll no old person, they told me to do it or I'd end up with some permanent marks on me. So I did it and I got away with it. But I've been arrested about six times for other stuff like theft, forgery, assault, criminal mischief and burglary. I've been convicted twice--once for theft and once for burglary.

I had started talking to my dad's girlfriend about how to get out of the CUZ'NS when Dorian Craig started hanging around. Dorian was always talking tough and was so excited about getting in and even came up with the tag "T-N-T." I thought it was all talk until one night Dorian called me and said, "I can't wait 'til I get hooked up officially as a CUZ'N. You see, I got plans to kill two birds with one stone when I get initiated." I asked, "What's up with that?" Dorian said, "All I can say is nobody will jack with me once I prove myself -- not the law, not my family and especially not people who lied about loving me. It's gonna be payback time and time to celebrate, too." I didn't ask what Dorian meant by this because I figured the less I knew the better. Dorian was acting all giddy like, you know. It reminded me of how the CUZ'NS were acting right before they blasted the roller rink. Anyway, I had nothing to do with that. I wasn't in town when it happened.

Last Thursday evening around 5:00 o'clock, I saw Dorian. I had borrowed my dad's car to go over to Bison City. I was going to meet with a man about a job at a furniture

factory. My dad had asked me to stop on my way out of town at Milton's Hardware Store and get an extra set of keys made for the car. I parked the car and was walking across the parking lot toward the store when I saw Dorian coming out carrying a Milton's Hardware Store bag. It was a medium-sized bag. Dorian had on a backpack and looked to be in a big hurry. Dorian seemed to be real happy about something.

Dorian saw me and threw me one of our signs and said, "What's up Mo?" I said I was cruising over to Bison City for a while to see what I could get going. I asked, "What's up with you?" Dorian said, "Don't you know? I'm gonna be an official CUZ'N tomorrow. I'm coming out over at the Fair and then it's time to celebrate. Make sure you're there by 4:00 o'clock so you won't miss the action. Anyway, Cuz, I gotta get goin'. I'll check you later." I watched Dorian walk away and I went on to Bison City.

I got the factory job and started work the next morning. I got home around 6 o'clock that evening. Kate was watching the news, and that's when I learned about the bombing at the State Fair and Dorian's arrest. Later, the police brought me down to make this statement.

These are all the facts that I can remember about this matter.

Morgan Abernathy
MORGAN ABERNATHY

SIGNED AND SWORN TO BEFORE ME the undersigned authority on this 16th day of October, 1996.

Teddi Rivas
Notary Public in and for the State of Texoma

My Commission Expires:
Oct. 29, 1997

ADDENDUM TO FACT STATEMENT OF MORGAN ABERNATHY

I never really liked Dorian Craig because Dorian was always talking about destroying somebody or something. I would always make nice though, because I knew Dorian was a real diehard wannabe CUZ'N and I was scared to dis Dorian. I had seen Dorian do some real crazy stuff to try to impress the gang leaders, like hanging a scared little three year old kid over a balcony on the fifth floor of a building and threatening to drop the kid to see if she could fly. To tell the truth, I was a little afraid of Dorian because the kid's nuts.

The police showed me a videotape of the fairgrounds taken just before the bombing. In it I saw Dorian Craig carrying a backpack - just like the one I saw when we saw each other at Milton's that time earlier in October.

Other than the above, no changes of any importance have occurred since my statement was given on October 12, 1996.

Morgan Abernathy
MORGAN ABERNATHY

SUBSCRIBED AND SWORN TO BEFORE ME the undersigned authority at 8:00 a.m. on this, the day of the trial of this case.

Teddi Rice
Notary Public in and for the State of Texoma

My Commission Expires:

Oct. 29, 1997

FACT STATEMENT OF DEVON WAYNE

My name is Devon Wayne. I am a special investigator with the Petro City Police Department assigned to the Gang Prevention Unit of the Crimes Against Persons Division. My specific area of responsibility and expertise involves monitoring gang activity and investigating organized juvenile crimes. I am 37 years old, married, and have two children, a daughter 10 years old and a son who is now 14. I received my associates degree in criminology from Texoma State College in 1982. I worked my way through college as a plumber's assistant and, after I got married, I moved to Petro City and attended the police academy. After two years in the patrol division, I was transferred to the Crimes Against Persons division where I have been assigned for the past eleven years. Approximately six years ago, I developed an interest in organized gangs in Petro City. Gradually, a few other officers joined me, and we have worked together as a loosely organized special unit for the last two or three years. Six weeks ago, the Department officially created a Gang Prevention Unit, and I was named Chief Investigator.

In addition to obtaining an associates degree in criminology and attending the police academy, I spend approximately three weeks each year in additional training, one week of which each year is specifically focused on gang prevention and gang issues. I am a member of and receive newsletters and information from three different national organizations which focus on juvenile crime matters and gang prevention. These newsletters provide information about new trends and concerns in juvenile crime and gang activities. Some of the topics covered include the initiation rituals of gangs. A few years ago, local gangs had an initiation ritual that involved initiates attacking male businessmen in broad daylight. Other incidents proved to be gang inspired.

In January of 1996, I received a newsletter from one of the organizations that mentioned a new initiation ritual involving terrorism. The ritual involved having a new gang member instigate a terroristic threat, such as a bomb threat or threatened toxic gas release. Threats of this nature had been increasing in number during the second half of 1995 and were being attributed to gang initiations. What caused my concern was not only the disruption and fear created by the threats, but also that at some point those threats would turn into actual acts of terrorism. The story mentioned three instances, all possibly gang-related, where bombs had actually gone off. Each of those three bombings had been in a remote area and one injury resulted.

Our unit has inititated efforts to warn kids that gangs are using them to commit serious offenses. We are concerned that many of these kids are joining gangs in an effort to gain peer acceptance. Our educational efforts are focused on stopping kids before they go through a gang initiation and are participants in a criminal act. In an effort to warn kids in all grades, I put together a flyer that was distributed on the first day of the 1996 school year.

About three months before the State Fair murders, there was a similar bombing at a roller rink. No one was killed, but about fifteen kids were hurt, some seriously, and a lot of property damage was done. The pipe bomb was determined to have been put in a paper bag. Unfortunately, no one was ever caught, but all indications are that the CUZ'NS were involved. We found some purple and green items of clothing in the vicinity. Also, I have heard through some of my gang prevention officers that some of the juveniles have heard CUZ'NS members bragging about the bombing.

I am familiar with the events that transpired on October 11, 1996. I had volunteered to work at the Fair on that day. We were concerned about some possible gang disputes due to the fact that two rival schools were likely to be there. I was assigned to the West entrance near the Midway. I arrived at 9:00 a.m., one hour before the gates opened. My shift ran until 8:00 p.m. I spent most of my time standing by the entrance making spot checks of items being brought in by fairgoers, and roughly on the hour, I patrolled the area from the entrance partway up the Midway to the indoor food concession area and over past "Big John," looking for any unusual activity.

"Big John" is the huge statue that welcomes folks to the State Fair and has become a popular meeting place for fairgoers. It is located approximately halfway between the West and South entrances to the fairgrounds. "Big John" stands approximately 6 stories tall, or sixty feet high. He is dressed in cowboy attire and has one hand resting on his belt and the other extended in a wave. At 4-minute intervals, a recorded voice booms out a short greeting. Even though "Big John" is hollow in many places, his base is solid and he weighs approximately 2-1/2 tons.

At approximately 4:23 p.m., I was almost finished making my loop when I heard a loud explosion. I was about 200 yards from the West entrance, facing toward the entrance and "Big John" was directly behind me about 100 yards. As I heard the noise, I turned to see where the explosion came from. I could see that "Big John" had toppled over, falling on the arm that was waving. There was a lot of screaming. I saw a few people with some blood on them. Almost everyone in the area was panicking and running.

I had two immediate concerns. First, I wanted to make sure that rescue and medical personnel were called immediately. Second, I wanted to secure the evidence at the scene and try to stop anyone who may have been involved with the bombing. I yelled to a security officer, who appeared to be in shock, to use his radio to call in the exact location and to request the immediate assistance of medical and police personnel. He started to make the call as I began to head over to "Big John." I don't remember if I walked or ran, but I quickly got to where "Big John" had been standing and where there was then a crater approximately 5 feet in diameter and about three feet deep at the center. I looked around the scene. Other than the injured people and those few who had stepped forward to give them aid, almost everyone else had fled. It was then that I noticed a person standing over against the wall of the indoor food area. This person, later identified as Dorian Craig, looked stunned. At first I thought nothing of it, until I saw a member of the CUZ'NS gang

approach Craig. There was a brief argument in which the gang member appeared to be trying to get Craig to leave. During their argument, I noticed several hand signals used by gang members, one of which I recognized as the hand signal for "not cool," which can mean anything from something not being liked to something being dangerous. Both were wearing the purple and green colors of the CUZ'NS.

After observing the two for several minutes, I walked toward them, at which time the unidentified CUZ'N ran off. Craig started to run toward the West entrance, but was apprehended after a bit of a foot chase by Officer Fife. I instructed Officer Fife to take the suspect in for questioning, and I arrived at headquarters approximately two hours later.

When I arrived at the police department, I found the suspect's attorney, Jesse Goodall, waiting for me, and I was informed that the suspect wanted to make a statement. After reading the Miranda Warning, again, the suspect gave me a statement which was initially handwritten, but was later typed up and signed by Dorian Craig. Craig admitted placing the bomb but claimed no knowledge that the bomb would actually be set off. Also, Craig claimed to have been pressured into placing the bomb by unidentified members of the CUZ'NS gang.

Subsequent investigation revealed that the backpack used to carry the bomb into the fairgrounds matched one that Pat Craig had purchased a few weeks previously. I checked with the store where the backpack was purchased and learned that only 29 such backpacks had been sold by the store prior to the State Fair bombing. The manufacturer of the backpack told me that the store I checked was the only distributor for their backpacks in Petro County.

These are all of the facts that I can remember about this case.

Devon Wayne
DEVON WAYNE

SIGNED AND SWORN TO BEFORE ME the undersigned authority on this 23rd day of October, 1996.

Teddi Rivas
Notary Public in and for the State of Texoma

My Commission Expires:

Oct. 29, 1997

ADDENDUM TO FACT STATEMENT OF DEVON WAYNE

A few days after the bombing, the local media wrongly reported that I was under consideration for disciplinary action because I did not assist the victims quickly enough. I later learned that the name of the deceased teen was Chris Monning. It was clear that Monning was deceased and blood was everywhere. I did not have a medical emergency kit with me at that time. I did not observe the other victims, Amanda Tippitt and her son Tony, until later. From the direction that I came to the scene, they were not visible. Apparently, they had the misfortune of being caught under the forearm of "Big John" that was up in a wave as it came tumbling down.

I was never disciplined as a result of my actions subsequent to the bombing, but my captain, Eduardo Chatham, was not happy about the bad press. On the day of the bombing, I was in plain clothes. That is probably why, when the 911 call was made and security officers ran by me, they did not say anything to me.

At the time of the State Fair bombing, I was working on an article for one of the national gang prevention newsletters. The title of the article was "Petro CUZ'NS Meet the Unibomber." In the article I discussed the Roller Rink bombing and my conclusion that the gang called the CUZ'NS was behind the bombing. I was really enraged about the incident because my son lost his right arm that day in the explosion. He was at the roller rink with his baseball team, celebrating their league championship. It has just been devastating for our whole family. While there has not been a definitive finding that CUZ'NS were involved, all of my observations and the evidence that I viewed support my conclusion.

When the State Fair bombing occurred, my son, the article I was writing, and the subject of gang bombings was on my mind. As I collared Craig, I said that I could not believe that gangs had gotten so stupid as to get into the bombing business, and that I could not believe kids would let the gang cause them to be part of a terroristic act. It's not worth it just to belong. I remember Craig saying something about my not knowing anything and giving me the typical excuses about the pressures, etc. - just the sick and pathetic ravings of gang members.

About a week after the bombing at the Fair, I updated my article to include information about what happened there, and I sent my article in for publication. It was published three or four weeks later. I received $150.00 as payment.

Other than the above, nothing of importance has occurred since I gave my statement on October 23, 1996.

Devon Wayne

DEVON WAYNE

SIGNED AND SWORN TO BEFORE ME the undersigned authority at 8:00 a.m. on this the day of the trial.

Teddi Rivas

Notary Public in and for the State of Texoma

My Commission Expires:

Oct. 29, 1997

FACT STATEMENT OF BERKELEY CRAIG

My name is Berkeley Craig. My birthday is June 21 and I'm 10 years old. I'm in the fifth grade at M. A. Calhoun Elementary School here in Petro City. Dorian is my older brother/sister. Pat Craig is my mother/dad. I was born in Sumnersville, but we moved to Petro City right after my birthday this year. I was told that we had to move because the child support checks stopped coming in and we needed the money. My parents divorced when I was about three years old.

I know what it means to tell the truth. I know lies can get you in trouble. I'll say what I remember as best I can.

When we moved to Petro City, Dorian was real excited. Before coming to Petro City, Dorian told me all about gangs. Dorian heard that there were some really cool kids who nobody messed with in these gangs. At first after we moved, things were kind of the same. It was summer and I missed my friends, but I got to hang out with Dorian. Then when school started, things changed. Dorian didn't like to have a "runt" around. Dorian's new friends were mean to me. I didn't like them and I thought Dorian didn't like them either. Then Dorian told me that the new friends were going to call him/her "T-N-T," and that was really cool. I asked what that meant, and Dorian said it was none of my business, that it was a gang thing. Dorian even carved T-N-T on the wall above the bed in our bedroom. When everything happened, someone covered it up.

One Saturday night, Dorian came home late. Dorian had been out with those new friends and was acting kind of funny, you know, talkative. Mom/Dad was mad as heck about Dorian coming home so late, but finally went on to bed and Dorian and I stayed up to watch a horror movie. While we were watching it, Dorian talked about these new friends called the CUZ'NS. Dorian showed me the hand signal for their gang name and said something about scaring people. There was one scene in the movie where monsters were trying to kill people in an amusement park and Dorian started laughing. Dorian said something like, "Yeah, great, that's the place to scare people." Then Dorian made a noise like "Boom" and laughed real loud. I knew it was wrong, but Dorian even took money out of Mom's/Dad's desk drawer and told me it was to buy the CUZ'NS colors, purple and green.

The last thing I can think of before Dorian went to the Fair that day was something Dorian said. It was that we'd remember that day, or something like that. I thought Dorian meant the rides since I had never been to the Fair and since I had been promised some cotton candy and a corny dog.

Everybody thinks Dorian is so great. Dorian had a lot of friends, but could really be mean. When we lived in Sumnersville, Dorian complained a lot, saying that many of the fun things we did were stupid. There wasn't a lot to do there, but Dorian played soccer and Coach Casey was Dorian's closest friend. I know that Dorian was glad to leave

Sumnersville after Chris stopped coming over to our house. I knew Dorian was mad at Chris, but I didn't ask why. I miss my friends in Sumnersville and I don't like my teachers or the school here. Maybe now we will move back. I hope so.

After Dorian left and all the police came, Coach Casey came to our house. Coach Casey said something about a pipe and a bomb and that scared me. My mom/dad told me everything would be okay, even though I knew Dorian had done something bad. I also heard Coach Casey say that Dorian was headed down the wrong path.

This is all that I can remember about what happened.

Berkeley Craig
BERKELEY CRAIG

SIGNED AND SWORN TO BEFORE ME the undersigned authority on this the 22nd of October, 1996.

Teddi Rivas
Notary Public in and for the State of Texoma

My Commission Expires:

Oct. 29, 1997

ADDENDUM TO FACT STATEMENT OF BERKELEY CRAIG

When we moved from Sumnersville, I knew I was going to be in a new school. All of the kids carried their books in a backpack, and I said I wanted one a whole lot. We went to a store where they had tents and stuff like that and got me this really neat backpack with extra zippered pockets where I could put gum and hide things.

Just before going to the Fair, Dorian asked to borrow my backpack for a while. Dorian promised to take me on some rides for getting to use my backpack. My mom/dad was going to take me after work. We were going to meet Dorian at the funhouse at 6 o'clock, but we got a phone call just before we left the house, and I didn't get to go.

When I talked to Mr. Devon the first time, I was really mad at Dorian for taking my backpack and then making the Fair close down before I got to go. I told Mr. Devon to tell the judge I didn't want to talk. I just wanted to make sure the judge knew I didn't see anything. I wasn't there. I think someone must have taken my backpack from Dorian. I just don't believe Dorian could have done it.

Dorian told me that nobody was supposed to get hurt and that the CUZ'NS had threatened our family and that Dorian had stopped them from coming over and hurting us. All I know is that I wish Dorian had never met those kids. I bet Dorian wishes that too.

I don't have anything else to say.

Berkeley Craig
BERKELEY CRAIG

SIGNED AND SWORN TO BEFORE ME the undersigned authority at 8:00 a.m. on this the day of the trial.

Teddi Rivas
Notary Public in and for the State of Texoma

My Commission Expires:

Oct. 29, 1997

FACT STATEMENT OF ROSH BILLON

My name is Rosh Billon. I am 17 years old and I currently live at the Northside Juvenile Shelter. I have nine months left on my juvenile adjudication for selling pot at school. Until my placement here, I went to North Petro High School. I would be a senior this year. What happened was that since I got caught selling only one joint to a freshman dude, I was put on a year's probation at home in my mom's custody. This was back towards the end of last school year. Then I failed a couple of drug tests at the beginning of this year, which violated my probation, so I was sent here.

I have two older sisters who live together in an apartment downtown and a thirteen year old younger brother who still lives with my mom. The thing I hate most about being in this place is that I can't help take care of my mom and my brother. But they visit once a week and things seem to be cool at home.

I was told to talk about my involvement with the CUZ'NS and how much I remember a kid named Dorian Craig. About eight months ago I started hangin' with a couple of kids from around my neighborhood. I knew they were CUZ'NS from their jackets, but they never really made no bones about me joining up. We just hung and smoked a bit after I got home from school. Even though my mom always made me promise I would never join a gang, I started spending time with more and more CUZ'NS. They seemed cool and all and nothing like what you hear about them on the streets about how violent they are and all. Man, was my mom right and I was wrong!

After hangin' for a couple months, some of the CUZ'NS started pressing me to plant a backpack under one of the seats in the Petrovision Movieplex. They said if I did it, I could wear the colors. And if I didn't do it, they said they couldn't guarantee the safety of my mom or brother. I didn't think they'd actually mess with my family, but, I don't know, I liked hangin' with them and, besides, I knew I'd look <u>real</u> fine in the CUZ'NS colors.

So one day I actually had the bag and was in line at the theater. I never opened the bag, but there was a note with it that said I was to put it under a seat and pull out a red plastic strip. It said I had to make sure I could get out of the building within two minutes. Looking back on it now, I don't know for sure if there was really a bomb or something in the bag, but I wouldn't be surprised either way. Anyway, as I waited in line for the ticket, I saw all the families and kids and stuff who would be in the theater and I just couldn't do it, man.

So I gave the bag back the next day and told them I ain't bombing or gassing no theater and they'd better stay the hell away from my family. I was surprised but that was about it. They never asked me to do nothing like that again and I even got my colors a few

days later (I think they liked my pot connections). There was no more talk about my mom either - not like I ever thought they would do anything because they know I'd make them pay.

Anyway, when the roller rink was bombed several months ago and all those people were hurt and I heard that some CUZ'NS did it - I said enough and just stopped hangin' out with them. About the time I stopped cruisin' with them is when that new kid Dorian came in. Dorian seemed more like the rest of the CUZ'NS. A loner, ticked off at life - you know the type. Dorian also seemed a little scared about the big city, kind of timid about life. I think Dorian had just moved here from some po-dunk town. Probably lookin' for a group to hang with. That's a tough place for a new kid to be in, especially at North Petro High. North P is a pretty rough school, where you need to belong to something just to survive - you know, a gang or the jocks or the nerds or whatever. A lot of the kids at North P join gangs. It was getting so bad that at the beginning of this year they put some flyers up around school warning us about the dangers. I think one of the flyers actually warned about the CUZ'NS. Probably due to that roller rink thing.

Not being from the streets like me, I bet some of the CUZ'NS could get Dorian to put one of those bombs somewhere by threats or tricks or something. I don't remember a whole bunch about Dorian, though.

Rosh Billon
ROSH BILLON

SIGNED AND SWORN TO BEFORE ME, the undersigned authority on this the 17th day of October, 1996.

Teddi Rivas
Notary Public in and for the State of Texoma

My Commission Expires:

Oct. 29, 1997

ADDENDUM TO FACT STATEMENT OF ROSH BILLON

I have reviewed my statement from October 17, 1996, and was told to add anything more I could remember about Dorian and the CUZ'NS. After thinking about it, I now remember that I bumped into Dorian a few days before the State Fair thing. Dorian was askin' if I was still a CUZ'N. I told Dorian I had blown that stuff off. Dorian asked me if I thought a CUZ'N would hurt a member's family if they didn't do what they wanted. I told Dorian about the movie theater thing and that nobody messed with my family. Dorian seemed real worried and scared. We only talked for a minute or so and then I left. I kinda felt sorry for the kid, but hey - I didn't have time to be nobody's guardian angel, you know?

Also, a few weeks ago my mom told me that she found the card that was attached to the backpack I took to the theater. I do not know which CUZ'N actually wrote it.

Other than the above, no changes of any importance have occurred.

Rosh Billon
ROSH BILLON

SIGNED AND SWORN TO BEFORE ME, the undersigned authority, at 8:00 a.m. on this the day of the trial.

Teddi Rivas
Notary Public in and for the State of Texoma

My Commission Expires:

Oct. 29, 1997

FACT STATEMENT OF CASEY SWANSON

My name is Casey Swanson. I am 34 years old. I live in Sumnersville, Texoma. Sumnersville is approximately 45 miles southwest of Petro City and has a population of more than 9500. Most of the folks here are cattle farmers, small business owners and many of the townspeople work at the Molly Steel Factory. In fact, most of my students (I teach English and P.E. at the high school) just assume they'll grow up to work at "The Molly," as they say it. I grew up in Sumnersville, and it's a great place. I left Sumnersville for several years when I went to college. I received my teaching degree from Texoma A & M in 1984.

I started teaching at Sumnersville High School twelve years ago, right out of college. I started out teaching freshman English. Sumnersville had only a football team and a track team. At that time, no other sports were offered. During my third year, however, I began teaching P.E. as well as English. My students were very enthusiastic when I taught six weeks of soccer. Few schools had soccer teams back then, but there appeared to be enough interest to start a team at Sumnersville, so the following year I organized Sumnersville High's first soccer squad. I have been coaching both the boys' and girls' teams ever since.

As far as I know there have never been any gangs in Sumnersville. The closest thing to any kind of rivalry is when the Sumnersville Steelers take on the Bison City Buffaloes each football season. Believe me though, it's a very intense rivalry.

I've always had a good rapport with teenagers, and I have a very close relationship with all of my students now. I think sports is one of the few things that keeps our junior high and high school children interested in school. It's hard to relate all of the stuff they learn in high school-current events, literature and geometry-to much that they encounter on the streets of Sumnersville. Sports gives them something at school to care about.

I met Dorian Craig on the first day of school in the fall of 1993. After gym class, Dorian hung around, lingering as if wanting to ask me something. Dorian was very shy. It took several weeks before I finally found out what Dorian wanted to say. One day just after the final bell, Dorian wandered into the gym, finally working up the nerve to ask if freshmen could play. Once I realized that Dorian was referring to the soccer team, I said that anyone who wanted to play, and was willing to show up to practice, made the soccer team at Sumnersville High.

Dorian played soccer every year after that until the Craigs moved to Petro City. Dorian certainly was not one of our strongest players, but absolutely loved being on the team. I don't think Dorian had a love for the game all that much. It was more about the sense of being part of a group that was the attraction. To Dorian, the soccer team members were closer than family. You know, that "one for all and all for one" way of thinking.

I noticed that it took Dorian a while to fit in. Dorian's a good person, but just cared too much about what the other students thought. I always tried to encourage Dorian whenever I could by saying things like, just be yourself, "to thine ownself be true" and things like that. I often quoted Shakespeare, my favorite. In time I believed that Dorian would make friends. It seemed to me, though, that Dorian felt like people's friendship had to be won in some way or another, whatever the cost. At practice, Dorian always volunteered for the drills that no one wanted to do, thinking that the others would be impressed if Dorian did the grunt work. Anytime something positive happened, like the first time Dorian scored a goal, Dorian was thrilled and absolutely thrived on the team's approval and their expression of acceptance, however short-lived.

The reason I say short-lived is that some of the tougher kids on the team roughed Dorian up from time to time and the others did nothing to stop it. In fact, almost everyone, at one time or another, taunted Dorian.

I remember one season when the team decided to send a message to the Bison City Buffaloes by dousing the high school with green paint. Our principal, Arnal Ridge, found out about it and threatened to discipline the whole team unless the one or ones who did it came forward. Although I'm sure Dorian had little to do with the actual prank, with a little bit of insistence, the team got Dorian to take the blame. I eventually learned that they had told Dorian to expect to be "ex-communicated" -- no one would befriend Dorian off of the field. Knowing that Dorian would do anything to be one of the gang, it didn't surprise me that Dorian took the fall.

Dorian had a very difficult time when Pat Craig decided to move the family to Petro City. I found Dorian almost in tears in the gym one Saturday. It was one of the rare times that Dorian voluntarily opened up to me, sharing with me the feelings of anxiety about fitting in and finding new friends. That was the main thing--nobody would be a friend. Dorian believed making the soccer team in a big place like Petro City was totally out of the question. At the same time, Dorian admitted concern about leaving Chris. Chris Monning and Dorian had been inseparable most of the year, although I had not seen them together as much around that time. Even though I tried to convince Dorian that making friends in Petro City would not be difficult, I don't think Dorian really believed it.

Pat became anxious and fearful about moving to Petro City, in particular because Dorian's attitude turned into a deep and bitter resentment toward Pat for forcing the family to move to Petro City! Dorian went from being depressed and withdrawn to being angry and agitated all the time. The anger was even directed at me in the end. You see, I had spoken with Pat several times about Dorian's problems at school and about Dorian's lack of confidence in general, and we talked more often after that Saturday when I found Dorian in the gym all upset, and, well . . . I guess Dorian might have thought that I was interfering too much in their personal life.

Dorian is a good kid really, and I just can't imagine that Dorian is responsible for the tragedy at the State Fair.

These are all of the facts that I can remember about this matter.

Casey Swanson
CASEY SWANSON

SIGNED AND SWORN TO BEFORE ME the undersigned authority on this, the 21st day of October, 1996.

Teddi Rivas
Notary Public in and for the State of Texoma

My Commission Expires:

Oct. 29, 1997

ADDENDUM TO FACT STATEMENT OF CASEY SWANSON

I didn't know it until after the State Fair incident, but Dorian had tried to reach me at school on October 10th. I was out of town at the time with the soccer team for a tournament held at Texoma A & M. When I came back to school on the following Monday, I found a phone message from Dorian in the office.

I have been thinking a lot about whether or not Dorian could have intentionally tried to hurt anyone, and I just can't believe that Dorian would go that far. I know Berkeley Craig has stated that Dorian knew exactly what was going on, but I also know that Dorian and Berkeley don't get along all that well. They are always trying to get one another in trouble.

And one more thing. I have started to worry that some issue might be made of my relationship with Pat. So that no one thinks that I have been hiding anything, I want to set the record straight. Not that it matters, but a few months before the Craigs moved to Petro City, Pat and I became involved with each other. Truth of the matter is, I think we are in love - seriously. I certainly am. Pat broke things off when they moved. Things are looking up, though. Once this whole mess with the bombing gets resolved, Pat thinks that it would be best for Dorian and the whole family if they move back to Sumnersville. I know if that happens, Pat and I will get our second chance.

Other than the above additions, no other changes or important events have occurred since I signed my statement October 21, 1996.

Casey Swanson
CASEY SWANSON

SIGNED AND SWORN TO BEFORE ME the undersigned authority at 8:00 a.m. on this the day of the trial.

Teddi Rivas
Notary Public in and for the State of Texoma

My Commission Expires:

Oct. 29, 1997

STATEMENT OF DORIAN CRAIG

DATE October 11, 1996. TIME 8:05 P.M. PLACE PCPD

I, Dorian Craig, am 17 years old and I live at FM 925 / Petro City, Texoma 91644

I am giving this statement to Devon Wayne, *who is identified as a Peace Officer of Petro City, Texoma, and has duly warned me that I have the following rights: that I have the right to remain silent and not make any statement at all; that any statement I make may be used against me at my trial; that any statement I make may be used as evidence against me in court; that I have the right to have a lawyer present to advise me prior to and during any questioning; that if I am unable to employ a lawyer, I have the right to have a lawyer appointed to advise me prior to and during any questioning and that I have the right to terminate the interview at any time.*

Prior to and during the making of the statement, I do hereby knowingly, intelligently, and voluntarily waive the above explained rights and I do make the following voluntary statement to the aforementioned person of my own free will and without any promises or offers of leniency or favors, and without compulsion or persuasion by any person or persons whomsoever:

I can't believe I'm being charged with capital murder. I know I put that backpack at the base of Big John and all, but it wasn't really a bomb. Well, what I mean is, I didn't know it was a bomb. I would never hurt anybody on purpose, much less a bunch of kids. I thought we were just going to pull a prank to scare some people and have some fun. That's what my friends told me. They said the "bomb" was just a pipe filled with nails to make it seem real. I don't know the first thing about how to make a bomb anyway.

I just moved here from Sumnersville and didn't know anybody. I've never really been very popular anyway, not like I'm weird or anything, but, you know, I'm just a little shy and have always had a hard time getting to know people. Like when I first got to my old school, I wanted to play soccer, right, because I'm pretty good. But, it took me like a month to get up the guts to ask Coach Swanson if I could try out for the team. Coach Swanson let me and everything was cool, but I just have a hard time making friends.

Well anyway, I really wasn't happy about moving from Sumnersville because I was going to have to leave Chris Monning, who I was pretty serious about, and would have to make a whole bunch of new friends. But when I got here, I met these kids around school who hung out together and they were real cool to me right away. They call themselves the CUZ'NS, which I thought was pretty goofy at first, but, you know, it's just like a club name or something. It's no big deal. So anyway, we hung out for a couple of weeks and they started talking about pulling this prank to scare people at the Fair. They joked about initiating me and stuff, and what with the Olympic Park thing and the roller rink bombing they just sorta started talking about how cool it would be to pull a terrorist kind of gag. You know, call the police, get on the news. That kind of deal. I thought it was pretty

stupid and all, especially because of all the real terrorist stuff that's been happening lately.

I told them I liked to joke around, too, but wasn't going to pull any kind of prank like that. I mean, that's way over the top. At first they started to give me grief, but then this one guy – called "Mo Better" or "No Better" or something like that – started calling me "TNT." Pretty soon everybody was calling me "TNT" and makin' out like I was a big deal, and all and that was pretty cool. I talked to a couple of the CUZ'NS in private and they told me that everybody had to go through initiation, but that it was no big deal and nobody ever got hurt. So after a couple weeks, I decided that I'd do some "terrorist" thing. I, mean, if nobody gets hurt, no big deal, right? I didn't tell them yes actually, but I did tell them that to really make people notice, maybe we should pull the prank at the State Fair.

I guess the CUZ'NS liked my idea because when the Fair opened some of them said they would bring this thing they called a "bomb" by my house. So, last night they showed up with this thing. It looked just like electrical conduit pipe you'd buy at Milton's, but it was sealed on both ends. They said they put some nails in there to give the right "feel."

Today was fair-day and we didn't have school. Berkeley had won a couple of tickets by reading books over the summer or something, so I was going to use one to go to the Fair around noon to meet some friends. I agreed to meet Berkeley there later in the day. So, when the CUZ'NS came over, it didn't really mess up my plans much. They told me to get a backpack and put the "bomb" in it. I don't think they really cared where I put the thing, as long as the scare made the news. The only reason I picked "Big John" was because I thought it would be a hoot to see the cops tearing up "Big John" to find my goofy little "bomb." Besides I was supposed to meet Chris there anyway. So, I figured what the heck I could check out the location after I saw Chris, ride a few rides and then pull the prank around 4:00 p.m.

My mind was mainly on seeing Chris. Chris had told me that we should break up because we were so far apart. I mean, geez, 45 miles is not that far, but Chris did not seem to see it that way. I hoped I could talk some sense into Chris, but I was worried. Anyway, I got up late. I didn't head over to the Fair until just after 1:00 p.m. I went to the indoor food court first and ate some pizza. I checked in with a couple of CUZ'NS and then went to hang around the Midway. I thought that I would see Chris there. I walked around for over an hour and figured I had been stood up. I didn't actually see Chris until about 3:30 p.m. I was walking by some rides and saw Chris riding some kind of boat ride with a couple of friends, having a great time. I waved and Chris waved back. A bit later, I headed over to "Big John" to pull the prank. When I got there, there were hundreds of people everywhere, so I figured there's no way I'm going to be able to stick this backpack under "Big John." Then I realized I could do like they do in the movies and just leave the backpack and walk off. So I sat down under "Big John" like I was just hanging out, you know. And, when I got up, I just left my backpack. Piece of cake. I hung around by the food booths for a while and then called 911 to tell them about the "bomb." Apparently,

word got back to the security guards real fast because within five minutes a bunch of cops showed up and people started freaking out around "Big John." That was when the explosion happened and.... I had no idea. I just had no idea.

I'm so sorry this happened. Everybody told me the bomb wasn't real. I didn't mean to hurt anybody. Honest, I didn't mean to hurt anybody. I really can't believe that somehow Chris was there and I feel sick about that woman and her kid.

I have read this statement consisting of 3 page(s), each page of which bears my signature or initials, and I do affirm that all facts and statements contained herein are true and correct.

Dorian Craig
Signature of person making voluntary statement

The above warnings were given by and
this voluntary statement was taken by

Deborah Bradley
Witness

Devon Wayne
(This must be one and the same person as named above)

SUBSCRIBED AND SWORN TO BEFORE ME the undersigned notary public on this the 11th day of October, 1996.

Teddi Rivard
Notary Public in and for the State of Texoma

My Commission Expires:

Oct. 29, 1997

ADDENDUM TO STATEMENT OF DORIAN CRAIG

Prior to and during the making of the following statement, I do hereby knowingly, intelligently, and voluntarily waive the rights explained on my original statement dated 10/11/96 and I do hereby make the following voluntary statements of my own free will and without any promises or offers of leniency or favors, and without compulsion or persuasion by any person or persons whomsoever:

When I gave my statement on October 11th, I was really scared. I mean, not about the arrest, because I thought I couldn't get in trouble if I didn't know it was a bomb. I was scared because of what the CUZ'NS might do. When I first started hanging with the CUZ'NS, they were really cool to me. I didn't know anyone and, well, I was nervous about being in such a big school. Sumnersville High was the only high school in Kent County and it was very small. I knew almost everyone. North Petro High has, I don't know, 4 maybe 5 times as many students. I felt lost at the beginning. And there were all these groups. I felt really uncomfortable being at North P without having somebody to hang with.

Anyway, when the CUZ'NS started recruiting me, I thought it was great. I remember bragging to Berkeley about the gang. I thought the stories of the bad stuff they had done was just talk. You know, kids boasting about being hot stuff. They wanted everyone to think they were untouchable. The first time I realized I had made a mistake was when one night they told me about this kid they roughed up. One of them told me it was almost as much fun as taking care of the guy's old man. I didn't ask what they did, but it got me scared. They were drinking and laughing and talking about bloodying up these people. A week or so later, they told me it was time for me to come out. I asked what they meant and they told me that I had to do something dramatic. They wanted a big scare and a lot of press. I said I still didn't understand. That's when Morgan, "Mo Better", put an arm around me and said, "It'll be easy, you just make a drop, call 911 and tell them it is T-N-T time. Then we can all watch as everyone goes crazy and thinks there's a bomb." I said that I wasn't doing nothing with a bomb. That's when "Mo" said, "You are one of us, or at least we thought you were. You're gonna do this or you and your family will really not like living on our turf. We don't let people live to tell our secrets." Then "Mo" said, "Hey Cuz, you don't have anything to worry about. The bomb isn't real. It's a fake, a toy. We're just going to have fun scaring some people." "Mo" was laughing at the end and slapping me on the back.

After that I tried for a week or so to talk to "Mo" and other gang members about leaving the gang. I told them I didn't know anything and that my family and I would not be a problem if they let me out. They continued their threats and then would be nice to me again. I was confused and scared. Right about that time I saw the movie, "Nick of Time," with Johnny Depp. I felt like that was kind of like my situation. This guy had to shoot someone to save his daughter. He figured out a way not to really do it. I just kept telling them that the "bomb" had better not be real. After a while, I stopped saying that because they laughed at me and started saying, "What, are you afraid of, a little T-N-T?" That led to them calling me "T-N-T."

Now that some time has passed and my family is still okay, I don't feel as scared. But back in October, I really thought I had no choice. I don't know what I could've done. I was really put in a bad situation. There was one guy named Rosh who used to hang with the CUZ'NS. I saw Rosh a couple of days before the Fair and heard all about this bombing at the roller rink that someone new with the CUZ'NS did. Rosh also told me about joining the CUZ'NS and that some of the guys said that they'd kill Rosh's mom if Rosh didn't plant a fake "bomb" at a movie theater. That really scared me even though Rosh said nothing happened. Rosh was different and there were other reasons the gang liked Rosh. I just kept thinking, what if the CUZ'NS are serious? Then I thought, hey, why take that chance, the bomb was fake anyway, right?

For whatever it's worth, we couldn't make bail. So I've been locked up since October. I've had a lot of time to think about how stupid I was and how much I hurt people. If I had any idea then that it was a real bomb, I would have never done it. I still have nightmares about the whole thing. Right after it happened, I was in shock. One of the CUZ'NS came up to me after the explosion and started yelling at me and telling me I had to leave. It was obvious this CUZ'N was not surprised by the explosion. I started yelling, "How could you do this?" I don't remember much else. The CUZ'N made some signs and said something about danger and cops. I started to leave and that's when Officer Fife stopped me.

I guess this letter from Chris was sent to me a couple of days before the Fair, but I don't remember getting it. Chris and I were going together when I was in Sumnersville. I was going to meet Chris at the Fair, but I didn't know Chris would be around "Big John." I didn't get the letter until later. I didn't know. What difference does it make? They told me the bomb was a dud anyway. It's not my fault what happened to Chris. I'd die before hurting Chris.

I have reviewed my previous statement and other than the above, no further amendments need to be made and no changes of any import have occurred since the October 11th statement.

Dorian Craig
DORIAN CRAIG

SUBSCRIBED AND SWORN TO BEFORE ME at 8:00 a.m. on this, the day of the trial.

Teddi Ewan
Notary Public in and for the State of Texoma

My Commission Expires:

Oct. 21, 1997

PROSECUTION REPORT

1. CASE CONTROL/WARRANT# 96-0728	2. DIVISION/SECTION CAPERS	5. DISPOSITION / DATE / COURT / DOCKET / METHOD	7. SERVICE # 96-45278H
	3. INVESTIGATOR D. WAYNE #2133		8. ARREST #
	4. INV.S WORK PHONE		

10. TYPE REPORT [X] COMPLETE [ ] PRELIM [ ] SUPPL [ ] G.J.R. 11. TYPE FILING [X] ADULT [ ] JUV

12. IF SUPPLEMENT INDICATE TO: [X] COMPLETE [ ] PRELIM. 13. DATE OF ORIG. REPT. 14. REASON FOR SUPPLEMENT: [ ] ADD. INFO. [ ] CORRECTED INFO. [ ] NAME CHANGE

15. FILED WITH	16. JUDGE	17. OTHER CO.	18. BY OFFICER	20. DATE
[ ] P.D. [ ] LEGAL [ ] LIAISON [X] WALKED THRU JUDGE	Faith Justice		D. Wayne #2133	10/12/96

21. STATUS OF SUSPECT [X] ARRESTED [ ] AT LARGE [ ] G.J.R. 22. LOCATION OF SUSPECT Petro County Jail

23. ARRESTING OFFICER(S)&I.D. B. Fife #3745 24. [ ] WORKSHEET FILING

25. SUSPECT Dorian Craig AKA "TNT"

26. RACE	27. SEX	28. AGE	29. DOB	30. RESIDENCE
		17	04/15/79	#7 FM 925

31. DATE OF ARREST	32. TIME OF ARREST	33. ADD. OF ARREST
10/11/96	7:58 P.M.	Petro City P.D.

34. DATE OF OFFENSE	35. TIME OF OFF.	36. ADD. OF OFFENSE
10/11/96	4:23 P.M.	5200 Miller Avenue

37. COMPLAINANT CHRIS MONNING & AMANDA TIPPITT (Deceased)

38. HOW COMMITTED Pipe bomb with timer

39. CHARGE CAPITAL MURDER 19.03 T.P.C.

40. PROPERTY TAKEN & VALUE 3 Human lives

41. REL TO OWNER [ ] YES [ ] NO

42. EVIDENCE & SEIZURES Witness statements, bomb fragments, voluntary statement from Defendant, flyer, letter, various human body parts 43. TAG#(S) 44. LOCA. EVID. NOW

45. RECORD CHECK Criminal mischief; assault - No. dispo. available

46. ACCOMPLICES	47. AGE	SEX	48. DOB	49. FILED ON
Unknown				

VICTIM-WITNESS

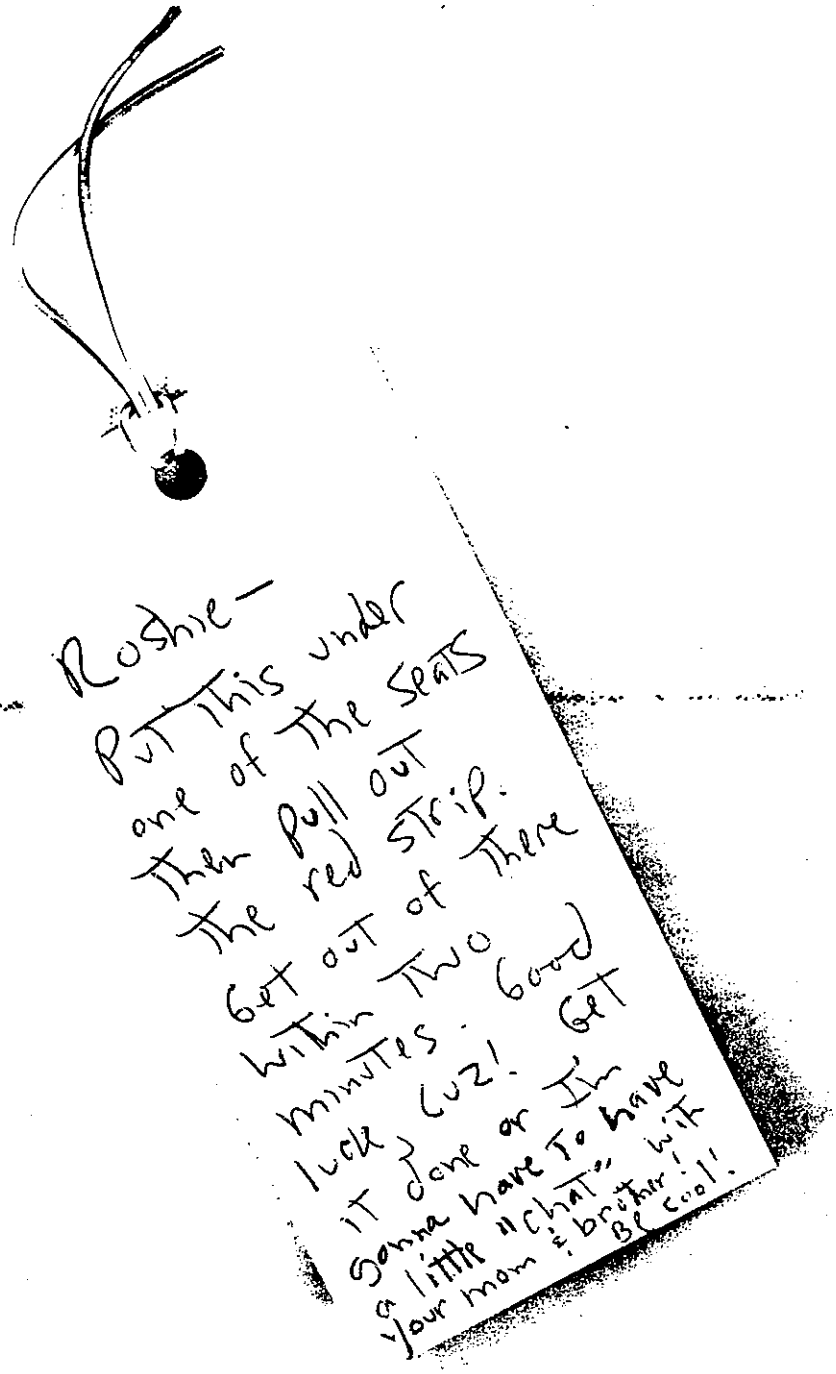
50. P.E.S. CALLED [X] YES [ ] NO

52. SUMMARY

At approximately 4:32 P.M. on October 11, 1996 a pipe bomb was detonated near the base of BIG JOHN, killing Chris Monning, Amanda Tippitt & her 7-year old son Tony. The Defendant was taken to the Petro City P.D. for questioning, where the defendant admitted placing a backpack containing a crude pipe bomb as part of the initiation as a member of the CUZ'NS gang. The Defendant has an arrest record for criminal mischief & assault.

53. MAGISTRATING INFORMATION		DATE	BOND $	METHOD	DATE	CLERK	DATE
	[X] WARNING FORM ATTACHED	MAGIS. BY JUDGE 10/11/96	None	[ ] OUT BEFORE MAGIS.		[ ] MAGIS. INFO NOT AVAIL	

54. DIVISION SECTION SUPERVISORY APPROVAL	55. I.D.#	56. DATE	57. BY OFFICER	58. DATE
		11/03/96	D. Wayne	


Roshie—
PUT This under
one of The seats
Then pull out
The red strip.
Get out of There
within Two
minutes. Good
luck cuz!
it done or Im
Gonna have To have
a little "Chat" wit
your mom & brother!
Be Cool!

To Principal Ridge
Date 10/10 Time 1:55

WHILE YOU WERE OUT

M Mary Evans

of

Phone

Area Code	Number	Extension
TELEPHONED	X	PLEASE CALL
CALLED TO SEE YOU		WILL CALL AGAIN
WANTS TO SEE YOU		URGENT
RETURNED YOUR CALL		

Message PTA Meeting next Wednesday (Oct. 16) at 730 pm

Operator LS

AMPAD EFFICIENCY® 23-021 - 200 SETS 23-421 - 400 SETS CARBONLESS

To Nancy
Date 10/10 Time 2:17

WHILE YOU WERE OUT

M John Jones

of

Phone

Area Code	Number	Extension
TELEPHONED	X	PLEASE CALL
CALLED TO SEE YOU		WILL CALL AGAIN
WANTS TO SEE YOU		URGENT
RETURNED YOUR CALL		

Message Billy Jones Dad called to let school know Billy would be absent tomorrow morning-dentist appt.

Operator LS

AMPAD EFFICIENCY® 23-021 - 200 SETS 23-421 - 400 SETS CARBONLESS

To Coach Swanson
Date 10/10 Time 234

WHILE YOU WERE OUT

M Dorian Craig

of

Phone

Area Code	Number	Extension
TELEPHONED		PLEASE CALL
CALLED TO SEE YOU		WILL CALL AGAIN
WANTS TO SEE YOU		URGENT
RETURNED YOUR CALL		

Message Needs to talk to you; says its urgent. Sounded very upset

Operator LS

AMPAD EFFICIENCY® 23-021 - 200 SETS 23-421 - 400 SETS CARBONLESS

To Principal Ridge
Date 10/10 Time 2:42

WHILE YOU WERE OUT

M Principal Smith

of

Phone

Area Code	Number	Extension
TELEPHONED		PLEASE CALL
CALLED TO SEE YOU		WILL CALL AGAIN
WANTS TO SEE YOU		URGENT
RETURNED YOUR CALL	X	

Message Tee time Sat. at 8:05 am

Operator LS

AMPAD EFFICIENCY® 23-021 - 200 SETS 23-421 - 400 SETS CARBONLESS

Monday, October 7

Dear Dorian,

You really got me in trouble with my folks over the weekend. You need to quit calling — specially on weekends late.

I was out with friends. You can't keep calling back and waking up my mom.

Look, you moved. I cared about you, but you're not here. So, I guess its over. So, let's stop talking. I mean it doesn't make sense.

But I got a couple of things of yours you might want. I'll be at the State Fair this Friday. Meet me near that statue at 5 p.m.

Chris

ATTENTION!

TO: ALL PETRO CITY ISD STUDENTS

The Petro City Police Department is circulating this bulletin to all area schools about the growing gang problems in Petro City. The PCPD asks that EVERYONE read this information and PASS IT ON to friends and family members:

In recent years, gang activity has increased in Petro City. While everyone wants to "belong" to a group, gangs ***are not interested in being friends!*** Many of these gangs have connections with drug, crime, and/or terrorist organizations around the country. They tell you that they will watch your back, but what they don't say is that you won't be safe in your own neighborhood anymore. Gangs recruit members by promising friendship, money, sex, drugs, and power. What they do not tell you is that once you start spending time with the gang, ***you are committed.*** Being committed means that you have to do whatever the gang wants you to do or they might take revenge on you or your family. The gang members also do not tell you what they expect from you until they get to know you and learn all about your family and what threats will work on you.

Gangs have been requiring new members to perform certain criminal activities as their "initiation" rights. YOU WILL HAVE NO CHOICE. The gangs will not let you back out and they will make you lie, cheat, steal, and bring harm to people. Over the last few months, some of the more serious criminal acts that we believe gang members have required of new initiates have included calling in bomb threats, setting fires, and placing real and fake bombs in public locations. We don't want to give these gangs publicity, but we are concerned about the growth of gang activity around Petro City, so we are warning you to...

STAY AWAY FROM:
Bluuz
The Crypts
The CUZ'NS
The Paax
Stars

We have not had confirmed deaths of any members or recruits of these gangs; HOWEVER, there have been dozens of deaths of members of these gangs in other parts of the country and reported assaults and deaths pertaining to family members. The PCPD is concerned because of the recent escalation of gang involvement, violence and criminal activity. Many injuries and emergency room visits are believed to be attributable to gang activities. The PCPD also believes that at least one gang was involved in the recent Roller Rink bombing.

Everyone needs to be aware of this threat. Talk to your friends, family, and neighbors about the dangers of gangs and becoming involved in a gang. Their violence is real. Be careful who you choose as your friends, and **REPORT ALL SUSPECTED GANG ACTIVITY TO THE PETRO CITY POLICE, DRUG AND GANG PREVENTION DIVISION at 1-800-555-GANG.**

BE SAFE --- STAY GANG FREE!

CAUSE NO. 96-CR-0549-A

THE STATE OF TEXOMA,	§	**CRIMINAL DISTRICT COURT**
	§	
Prosecution,	§	
	§	
VS.	§	**IN AND FOR**
	§	
DORIAN CRAIG,	§	
	§	
Defendant.	§	**PETRO COUNTY, TEXOMA**

SUPPLEMENTAL STATEMENT OF STIPULATED FACTS

XII.

The photograph of "Big John" attached hereto is authentic and is a fair and accurate representation of the scene of the October 11, 1996 bombing at the State Fair as it appeared shortly after the bomb explosion. The exact time at which the photograph was taken is uncertain, except that it was taken sometime within twenty-four (24) hours after the explosion.

Respectfully submitted,

_____

Attorney for the State

_____

Attorney for the Defendant

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