

7-23-97 conf. w/ jack and bob and wally
jack indicates that the dream statement was made to mitch
widden, a marine buddy of d's who wound up at liberty college

7-29 called david lowery arson expert in clt 704-336-3979 who
said his rates are \$90/hr & would call back seemed like a
decent honest guy--I understand from bill best that he does
work for law enforcement--talked to him at some length later--

Says Day
Ballistics says that
bullet was fired from polygonally
rifled barrel 9s are Glock
HK has a .45 which is polygonally
rifled

Jan '97

Ronnie initiated the visit

Thurs ~~1/31~~ & Kim got there 10 p.m. at
Mitch's

Next day my stuff

~~to~~ Ronnie & Kim went to school w/
Mitch 2 kids

Ronnie & Kim take them to dinner

Ronnie & ~~Kim~~ Mitch do devotions

short time
Mrs ~~Widdon~~ passed out

They had to get back on duty Sunday
am.

2 wks later Ronnie gets call from Mitch
then Mitch's wife gets on phone & says
it was great seeing you here

2 wks I'm down here I want
to see you at Base
Mitch shows up at chapel to have
lunch

to he wants to talk outside
Mitch says I've been to see a lawyer
and I don't have a problem w/
anything you told me

By the way if you want to find
out if it was a dream why don't
you go ask your brother for the
money.

Ronnie may have made admission
to RP black women
Maybe that's Tina

Ronnie's

he is a decent guy but not that smart and assumes that everything the cops and fire dept. does is ok--I asked him if he reviewed the reports if he would have any trouble testifying against the sbi or fire dept. guy if he was out of line and he sort of hemmed and hawed ard.

called john lentini atlanta 770-423-1400 recommended by cheshire as the best lentini charges \$125/hr and says that he will take appointed cases but would have to send intermim bills

says that we need to get and read two books, kirks fire investigation (item #tcres-1 \$48 & nfpa-921 (item #tc-921-95 \$27.50) so that we can intellegently discuss the case with him 1-800-344-3555 to order

7-29 talked to mike ingold bout getting him appointed

he is obviously not interested in taking cases where the defendant is guilty

d and wife went up to portsmouth to naval hospital for d's sleep disorder and d saw this marine buddy of his--mitch widden(sp). d indicates that during the time he and his wife were up there with mitch, d's wife, kim, called her mother, mrs. stump who said that she was on the phone w/ det. church and would call her back

at this point d says why don't they leave me alone and this somehow precipated a conversation concerning dreams and d told him that he had had a strange dream where he and his brother and another guy were sitting around and his borther said why don't you and htis other guy murder my wife and I will give you \$20,000.00. Then there was a big crash and he woke up

mitch went to the dean of hte college, dr. wellington and then to jerry fallwell. he told wellington that d had said he and his brother were involved in killing his borther's wife.

jack thinks that mitch is not going to put this in terms of a dream--that he is going to say that d confessed to him. jack has talked to Dr. Wellington and says that he has brought him around closer to our point. but he says that he obviously believed this guy mitch. jacks theory is that mitch is in it for the crimestoppers reward money--some \$40,000 according to what jack has been told

why did ronnie and ted do the affidavits.

at the meeting to day, we talked about shrinks in the penalty phase and it was agreed by all that at this time it would be foolish to apply for funds for a shrink

we did decide that we needed a fire (arson) expert and I volunteered to find us one I called yurko's office but lyle was on vacation--his partner is supposed to call back. lyle did the hamlet fire case and I figured he would know somebody

wally agreed to find us an insurance expert

I told jack I would draft a motion ex parte for an investigator

FURTHER DISCOVERY THAT WE WILL NEED

they video taped and photoed the residence for arson purposes

SBI ernie becker they took samples of the house to analyze for arson p 188

we need pics of the side door bcs. they say there was damage to the lock area--if ronnie he would have had a key--if intruder it would have been a b&e

both west end bedroom were ransacked--the drawers pulled out and dumped ;on the floor, but nothing inthe closets taken

she had left her pocketbook in the car and the keys were still in the car

if the dog is still in the house why doesn't he start barking and raising hell when the intruder comes in.

if the dog knows ronnie then he won't bark where was the dog kept during the day

they found several loose keys outside--the keys would not fit any locks at the house--we may be able to argue that these were left by the killer and if ronnie was the killer the keys would have been tested at his house and should have matched

they also found a set of keys in the kitchen

NOTES

they have a check for \$5,500 from patrick pardee, ghoud friend of ted, to lyles building supplies what is the significance

rodney woodberry who worked for ted says that ted told him at one time he swished he had a hit man and asked him if he wanted a bunch of money

ted kimble statement on pg283

ronnie statement to navy cid on oct 30 95.
d says that he owns no guns except a rifle which had been lost or stolen abt. one year ago
says that ted owned a glock .44 or 45 and that he was told by unknown person that the gun was found next to v's body and that was the gun used to kill her (who was this unk. person and are they going to come in and say that non one knew that except the officers investigating the case.

we also have the narrative abt. the strange man who was drunk at the funeral and told ronnie he was a supsect in the case and that he used to date v

ronnie also says that he asked v's bro ruben abt the guy and ruben said he knew him and he did used to date v

ronnie also tells them v maanged apartment complex and she had gotten death threats from tenants she had to evict

ronnie also told the cid that he had heard that somebody poured gas ove the inside of the house and left a trial to the door way where it was set

they tried to interview ronnie again on mar 20 96 but he refused first calling his father

church writes a memo 6-6-96 in which he outlines questions he has for roonie that were not answered in the initial interview

1. where did he and ted go for 2 hours on the night of oct. 10 (with flashlights)
2. why did he try to page his father on the night of v's death when he knew he was in lynchburg
3. what did he do for 4 hours onthe morning of oct 9 other than pick up the underpinning
4. exactly what time did he take the box truck back to ted's house
5. who was hte other white male who was with him on oct 9 and who owns the blue camero he was driving that day

there is a july 25 96 interview with ronnie by church and pendergrass and sbi agent webster and church admits that he did not take notes of the interview only wrote down two things

ronnie was interviewed at the sbi office in jacksonville and was allowed to record the interview

pg 349 they tested head hair found on the gun and found it consistent with v's hair

they did ballistics on the bullet from v and it is consistent with known shot fired from the glock but can't say conclusiviely that it was fired from same gun. however, they can't say based on ballistics that the test shot was fired from the glock

Ask bob where they normall kept the dog (in bathroom)
was the lawn mowed
how does she get into the house if the keys are in the ignition--does she keep house and car keys separate, if not why weren't they found on her body and why does she leave her purse in the car

sbi agent webster did the arson investigation and determined that the fire burned for a period exceeding two hours

the floor joists were burned all the way through and his theory is that the gas used to start the fire (which was also poured out into the living room) used up all the available oxygen and then the fire smoldered until it burned through the floor and the air from the crawl space was allowed to come in

they later found a burner on the stove set on medium high

cops obviously think that ronnie's buddy marine neil donald silverthorn was involved because they made the lineup to include silverthorn and interviewed his mother donna weiant in junction city, ky about his whereabouts on oct 9, 95

autopsy lists no stippling or powder residue, but points out the body was severely charred

the wound track goes into the side of the head at just below eye level and then doesn't quite come out the other side in the same position we could argue that it would have had to have been sb abt. patricia's size, you aim at eye level

the side door had pry marks and the "bolt plate was missing

glock was found on the floor of the master br

ted kimble was at work at pfg at 5:30 p.m. 10-9 he normally started to work at 3 but made arrangements to come in late several weeks earlier bcs. of a conflict with lyles kimble made a couple phone calls at work ard. 7:30

time line

cops interviewed nancy young who worked at the cinnamon ridge apts with patricia

she says that patricia got into work about 9:40 a.m. and then went to lunch ard. 11:45 and returned at 1.15.

patricia said she was leaving early at 3:30 to mow the grass and also told nancy that she was going to a church meeting at 7:30

Ted called patricia abt. 10 mins before she left at 3.20

the witness checked out of food lion at 6.04 and according to their times would have been stopped at brandon station court at 6.21 to 6.25 got a good look as the car in front of them stopped to turn into brandon station and then ronnie turned in front of them left in brandon station driving a blue camaro--

the witness says that ronnie was not somebody he/she had seen before or since and also says that only one person was in the car pg. 147

their theory is that ronnie had to kill patricia and set the fire and get back to the stumps pick kim back up and go to winn dixie by 7:36

this theory obviously encompasses the theory that kim and mr. and mrs. stump are lying to cover up for ronnie

kim's check at winn dixie was run thru the register at 7.36

PG. 88 FOR BOB FAST CASH PAWN OWNER SAYS THAT TED'S MOTHER BROUGHT IN SOME JEWELRY TO BE CLEANED AFTER THE FIRE, A DIAMOND HEART PENDANT, DIAMOND EARRINGS, A WATCH AND OR HOOP EARRINGS

WHAT IS PAGE 111-A note which says "pistol G to kim Pa Ted when G ___ her

ASK BOB ABOUT THE ANSWERING MACHINE--PATRICIA'S co worker, nancy young says that she called patricia's house at 4 p.m. to let her know that the boss had called but got no answer, and hte answering machine did not come on after 4 rings

find out if ted ever collected any money ont eh ins. policies that were in place at time of death

the witness whose initials are tp picked ronnie out of the 2 line ups showing both a frontal and a side view

QUESTION FOR MIKE INGOLD-- IF THEY JUST DID THIS LINE-UP ON JUNE 26 96 HOW IS IT THAT THE WITNESSES JUST HAPPEN TO HAVE THIS FOOD LIYON RECEIPT FROM WAY BACK IN 10-9-95--SURELY FOOD LION DOESN'T SAVE COPIES OF ALL THEIR RECEIPTS THAT LONG

MIKE SHOULD BE ABLE TO RUNN DOWN THE CASHIER BECAUSE HER NAME IS ON THERE CRISTY STORE #566 370-9883

ANOTHER QUESTION-- WHEN THE COPS DID HTE TIMES DRIVING FROM THE STUMP RESIDENCE TO PATRICIA'S HOUSE THEY ASSUME A 2 MINUTE STOP ON THE WAY AT RONNIE'S TRIALER WHY? *To switch cars*

THEIR ASSUMPTION IS THAT RONNIE WAS PULLING INTO BRANDON STATION COURT AT 6:25 WHEN THE WITNESS SAW HIM, OBVIOUSLY ON HIS WAY TO KILL PATRICIA--the problem with that is that it puts patricia out doing stuff for 2.5 hours from 4 to 6.25 becs. her keys and purse are in the car james ogburn, who worked for ted at lyles says he was there until 5:30 and also says that patricia brought lunch and they ate there at lyles

mr. stump says that he got to ronnies trailer about 4.50 and stayed there until 5.30

mrs. stump says that ronnie and kim came by her house at a little after 6 p.m. and stayed for "a few minutes and left saying they wer going to the winn dixie to get some stuffed flounder."

church interviewed kim kimble on 6-10 and here is her timetable

10-9-95 she and ronnie both left eh house ard. 7:30 to 7.45-- ronnie was driving her camero to go to teds house to get the box truck and she drove the white dodge daytona to go tot work

kim says that ronnie called her at noon and asked if she wanted to have lunch but she told him to go ahead and get the underpinning on. kim reports that ronnie said he had to take the truck back to ted's house and get her camero

kim tracks ronnie about not having the tool and so he had to go back to lyles and that he called her about 3 p.m. and said he was going back to lyles to get the tool--why would you call your wife if you were about to commit a murder

kim says that she got home at 5.40 p.m. and ronnie was there and they decided to go to winn dixie and get the flounder-- they drove to her mom's and got the flounder and went home and were eating and watching tv at 8:30

they went to bed around 9 p.m.--then got hte calls from the woman identified as christy about the house being on fire a neighbor, mrs. ransom reorted seeing a haze of smoke over the trees about 7:15 but said it could have been as early as 6.45

another neighborsteve frye saw smoke between 6.30 and 7 p.m. reuben blakely reported the fire at 8.47 rb said ted ahd called him between 8 and 8:30 to tell him that he could not get in touch w/ v

NOTES

FILE MOTION TO SEVER

FILE MOTION or DON'T FILE A MOTION AND JUST OBJECT AS IT COMES UP TO EXCLUDE ALL THE EVIDENCE OF TED'S GUILT so that we can object to it each and every time and not do any cross examination

jack and I have to make a decision as to whether we want to contest ted's guilt at all during the trial--the danger is that his guilt will become the issue in the trial and we will lose that and ronnie will be convicted becs. he is ted's brother my vote is to not contest any of it becs. it is not relevant

is there any evidence that ronnie got any money from ted at any time

if ronnie did the killing at some point ted would have to pay him something

do we want a shrink--john warren might be able to talk abt. ronnie's dependent personality--of course that directly conflicts with the case we want to put on in the guilt phase