

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT
OF INDIANA**

Jane GRAHAM , and	§	
V. Z. LAWTON	§	
Citizens of the State of Oklahoma,	§	
Plaintiff	§	
	§	
v.	§	
	§	Cause No. _____
Harley LAPPIN , Warden	§	
United States Penitentiary	§	
Terre Haute, Indiana,	§	
Defendant	§	
	§	
The Honorable Steve CARTER ,	§	
Attorney General, State of Indiana,	§	
a necessary party for matters involving	§	
public charitable trusts doing business	§	
in Indiana,	§	
Necessary Party	§	

AFFIDAVIT OF JANE GRAHAM

State of Oklahoma §
County of Oklahoma §

Before me, the undersigned Notary Public, personally appeared before me Jane Graham, known to me, who, upon being sworn, deposed and stated as follows:

1. I am Jane Graham. I am at least 21 years of age, and I have personal knowledge of the following facts, which facts are true and correct.

2. I am a victim/survivor of the collapse of the Murrah Federal Building on April 19, 1995, in Oklahoma City, Oklahoma County, Oklahoma. Among other information, from my location on the 9th floor, I felt both major explosions, and I saw the wet concrete filling in the 24-25 foot pits (craters) in the basement of the Murrah Federal Building, within hours after the

explosions.

3. I have made myself and my information available to the investigating authorities. However, my testimony was never sought for Grand Jury purposes and for trial purposes.
4. Also, I have been visited by officials who have tried to dissuade me from testifying as to the involvement of one Mr. Gary Hunt in the activities surrounding the explosions that collapsed the Murrah Federal Building.
5. I am one of several victims/survivors, and otherwise interested, parties plaintiff in a civil matter pending in Oklahoma arising from facts and circumstances of that bombing. It is difficult to continue with litigation when the evidence keeps ending up destroyed or otherwise made unavailable for any purpose.
6. Not only is there an interest in maintaining justice and fairness in the judicial proceedings of which I am a party, and with all matters stemming from that disaster, but some even more immediate is the possibility that the execution will not be within the authority normally expected for such procedures, but rather outside that authority. An entire group of us have endured quite a bit, directly, and if there is a way to prevent further damage, which could be rather serious in nature, in particular as regards the Warden and his staff, I am just one of several very interested in seeing that such further damage is prevented and avoided where it is at all possible to accomplish.
7. This completes this Affidavit.

(Please see next page for signatures.)

Signed and sworn to on this the 10th day of May, 2001.

Jane Graham, Affiant

Notary Public

(Seal or Stamp)

My Commission Expires: _____

CERTIFICATE OF SERVICE

On this the 10th day of May, 2001, I certify that I have served upon the following parties, by process server, the foregoing Affidavit of Jane Graham:

Warden Lappin
United States Penitentiary
4200 Bureau Rd N
Terre Haute, Indiana 47808

Attorney General Carter
Indiana Government Center South, 5th Floor
402 West Washington Street
Indianapolis, Indiana 46204

Harmon L. Taylor