

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT OF  
THE STATE FLORIDA, IN AND FOR PASCO COUNTY  
CASE NO. CRC14-00216CFAES

STATE OF FLORIDA,

Plaintiff,

vs.

VOLUME I

CURTIS J. REEVES,

Defendant.

PROCEEDINGS: Excerpt of Testimony of:  
CURTIS J. REEVES

DATE: February 28, 2017

BEFORE: The Honorable Susan Barthle  
Circuit Court Judge

PLACE: Robert D. Sumner Judicial Center  
38053 Live Oak Avenue  
Dade City, Florida 33523

REPORTED BY: Charlene M. Eannel, RPR  
Court Reporter

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A-P-P-E-A-R-A-N-C-E-S

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1 P-R-O-C-E-E-D-I-N-G-S

2 (Thereupon, the following excerpt of Trial  
3 Testimony of CURTIS REEVES was transcribed per request of  
4 Counsel.)

5 THE COURT: You may be seated. Thank you.

6 All right. Are we ready to begin?

7 Defense is ready, Mr. Escobar?

8 MR. ESCOBAR: Your Honor, the Defense would call  
9 Curtis Judson Reeves.

10 THE BAILIFF: Step this way, stand right here.  
11 Face the clerk, raise your right hand to be sworn.  
12 (Thereupon, the witness was duly sworn on oath.)

13 THE BAILIFF: Come have a seat up here. Adjust  
14 the mic. Speak in a loud and clear voice for the  
15 Court.

16 THE COURT: You may proceed, Counselor.

17 DIRECT EXAMINATION

18 BY MR. ESCOBAR:

19 Q. Good afternoon, Mr. Reeves.

20 A. Good afternoon, sir.

21 Q. Mr. Reeves, would you please state your full  
22 name for the record and spell it?

23 A. Curtis Judson Reeves, R-E-E-V-E-S, Jr.

24 Q. Mr. Reeves, are you married?

25 A. Yes, sir, I am.

1 Q. And to whom are you married?

2 A. Vivian Reeves.

3 Q. And when did you get married?

4 A. October of 1967.

5 Q. Do you have children?

6 A. Yes, sir, I do. I have a son and a daughter.

7 Q. What are their names and what are their  
8 occupations?

9 A. Matthew is a police officer in Tampa, and my  
10 daughter is -- works for the bank here in Dade City.

11 Q. Mr. Reeves, I'm going to first start focusing on  
12 some of your education. Please tell the Court, did you  
13 graduate from high school?

14 A. Yes, sir, I did, in 1961.

15 Q. What high school did you graduate from?

16 A. I went to Hillsborough High School.

17 Q. While attending Hillsborough High School, did  
18 you develop an area of interest to possibly pursue post  
19 your high school diploma?

20 A. Yes, sir, I did. I joined the Naval Reserve in  
21 my -- between my junior and my senior year I joined the  
22 Naval Reserve in Tampa.

23 Q. What's the Naval Reserve?

24 A. Well, it's a six-year program that you go into.  
25 You do two years of active duty and six years' obligation.

1 That's a military obligation.

2 Q. Okay. And did you start that program while you  
3 were still in high school?

4 A. Yes, sir, I did.

5 Q. Explain to the Court how that took place.

6 A. I joined the Naval Reserve between my junior and  
7 my senior year. I went to boot camp. Then as soon as I  
8 got out of high school, I went to submarine school in  
9 Connecticut.

10 Q. Now, submarine school, meaning that you were  
11 going to be working the submarines?

12 A. Yes, sir, submarine service.

13 Q. Now, when you graduated from high school, what  
14 did you do then?

15 A. I went into the Navy for two years. I spent two  
16 years on a submarine in the U.S. Navy, and at the end of  
17 that time, then I reverted to my Reserve time.

18 Q. Okay. What was your position there in the Navy  
19 on the submarines?

20 A. I was a leading seaman for probably about a  
21 year-and-a-half or so, two years. Then I took the test  
22 for promotions, so as I got out I was a Machinist's Mate,  
23 Third Class.

24 Q. Now, you get out of the Navy. You're still in  
25 the Reserves. You still have to participate in the --

1           A.    That's --

2           Q.    -- to be active?

3           A.    Yes, it's monthly meetings, then two weeks  
4 active duty each year.

5           Q.    Okay. Your choice of going into the military  
6 right after high school, did that play a role in you  
7 wanting to have a further education?

8           A.    Yes, sir. I was interested in the GI Bill. I  
9 didn't think I would be able to afford college, so I  
10 wanted to get the GI bill, which was part of the military  
11 program.

12          Q.    Now, after you got out of the military, after  
13 that two-year period, did you begin to work?

14          A.    Yes, sir. I did.

15          Q.    And what did -- what occupation or what job did  
16 you first obtain?

17          A.    I was hired by General Telephone at the time,  
18 GTE. I was ultimately designated as a heavy construction  
19 lineman.

20          Q.    What is a heavy construction lineman?

21          A.    We put in -- we replaced what used to be called  
22 open water leads, which was -- if you were remember all  
23 the cross arms that used to be up there with all the  
24 wires, we replaced those with cables. It was running  
25 cables in the neighborhoods, running cables between

1 different offices. Just expanding the telephone service,  
2 in general.

3 Q. How long did you do that for?

4 A. About two years, sir.

5 Q. And then what happened?

6 A. At the end of that two-year period, I took a --  
7 I applied, I think, about that same time for the  
8 Hillsborough County Sheriff's Office and Tampa PD.

9 Q. Why were you choosing a law enforcement career  
10 now?

11 A. I guess I was -- in the service, so to speak, I  
12 was kind of accustomed to the regimen of the life. I saw  
13 law enforcement as an opportunity to serve the community.

14 Q. So you applied to both of these particular  
15 outfits and who do you get a call from first?

16 A. Tampa PD. They both interviewed me. Tampa PD  
17 called with a job offer first.

18 Q. What year was that?

19 A. That was in 1966.

20 Q. Let's talk a little bit about your initial years  
21 there with TPD. Did you go to the academy?

22 A. Yes, sir. I did.

23 Q. How did that process work, initially?

24 A. Initially, they hired you, and I spent about a  
25 week or two on the street with a corporal. And then the

1 academy started. So then I went to the academy which was  
2 there at the police department in those days. I graduated  
3 before Christmas in 1966.

4 Q. Okay. And once you graduated -- let's talk a  
5 little bit about your time there with the academy.

6 The academy lasts for how many weeks, you said?

7 A. I think it was like 300-and-something hours, if  
8 I remember correctly.

9 Q. And were you selected for a particular position,  
10 as part of your academy class?

11 A. Well, I was vice president of the class. Yes,  
12 sir.

13 Q. Were you given any awards as a result of your  
14 participation there at the academy?

15 A. I was given an award called -- I think it was  
16 called an Award of Achievement, which was a kind of the  
17 best all-around performer during the academy, I suppose.

18 Q. Did that particular award, at some point in  
19 time, become even more special to you?

20 A. I'm not sure of the exact time frame, but my son  
21 has been in law enforcement for about 12 to 13 years and  
22 he got the same award.

23 Q. You finish the academy. Do you start your  
24 service to the community?

25 A. Yes, sir.



1           Q.    And what position do you first occupy as a law  
2 enforcement officer with TPD?

3           A.    The first year a probationary officer.  So you  
4 ride with a field training officer -- in those days it was  
5 a corporal.  So you're assigned with a corporal.  And I  
6 think the probationary period is, like, four to six  
7 months, something like that.

8           Q.    So you're working patrol?

9           A.    Yes, sir.

10          Q.    How old are you at this point in time,  
11 Mr. Reeves?

12          A.    I'm probably about 24 -- 23, 24.

13          Q.    Okay.  Now, going into the community and serving  
14 the public, tell the Court about your experiences working  
15 as a patrol officer in the streets of Tampa back then.

16          A.    It was quite an experience.  I never realized  
17 how much -- how much -- how many problems were in the  
18 community.  I mean, you're constantly going from call to  
19 call with high activity levels of all sorts of activities  
20 that require police presence.

21          Q.    And the activities that you're talking about,  
22 are they activities that sometimes result in serious  
23 injuries?

24          A.    Absolutely.  Very high percentage of injuries,  
25 fights, thefts.

1 Q. Robberies?

2 A. Yes, sir, thefts.

3 Q. Thefts?

4 A. Murders, I guess you could say. Well, I know  
5 you could. I've responded to a couple of those as a young  
6 officer. A lot of domestic disputes, such as -- that was  
7 one of the calls in those days.

8 Q. In experiencing your first couple of years as a  
9 law enforcement officer, did you have an opportunity to  
10 see individuals that were seriously injured as a result of  
11 someone else's hands?

12 A. Oh, yes, sir. Absolutely. That was a -- I  
13 guess you could say that was a daily occurrence. There  
14 was always somebody hurt by someone for something.

15 Q. Did you ever respond to domestic violence calls?

16 A. Rather frequently, yes, sir.

17 Q. And did you see the injuries that had been  
18 perpetrated between one individual and another in domestic  
19 violence?

20 A. Yes, sir, I did.

21 Q. With their hands?

22 A. With their hands and every tool imaginable.

23 Q. Did you see injuries such as a broken orbital  
24 bones?

25 A. I did see a lot of eye injuries, yes, sir.

1 Q. Broken jaws?

2 A. Oh, yeah. Yes, sir.

3 Q. Broken noses?

4 A. Yes, sir.

5 Q. Facial lacerations?

6 A. Yes, sir. One of the responsibilities for the  
7 zone that I worked at was Tampa General Hospital, so you  
8 got to see a lot of the injuries that came there from  
9 other zones around the city, so...

10 Q. Back in that period of time, was it just -- was  
11 it just going to the person's house and seeing the  
12 injuries on their person, or was it a follow-up also in  
13 going to the hospital?

14 A. Well, you -- if you -- if you were available and  
15 it was a serious enough offense, you followed it up at the  
16 hospital. If not, then someone else could follow it up.

17 At one point in time, we actually ended up with  
18 what we call a -- hospital man that was there all the  
19 time. But in those early years you followed up on your  
20 own, and if somebody was coming from the hospitals from  
21 somewhere else in the city, then you could be dispatched  
22 there to deal with their victim.

23 Q. Prior to starting your career in law  
24 enforcement, had you ever experienced anything like that  
25 on a daily basis, seeing some of those tragedies that

1 occur day in and day out?

2 A. It was an absolute eye opener. And the answer  
3 is, no, nobody can have that kind of experience. The only  
4 way that you would have that kind of experience is if  
5 you're in law enforcement.

6 Q. Now, you married Mrs. Reeves, I think you told  
7 me, in October of 1967?

8 A. Yes, sir.

9 Q. Okay. In 1968, did you apply for a promotion?

10 A. Yes, sir. There was a -- I think it was called  
11 a Selective Enforcement Unit, it had an opening. The  
12 corporal that -- that was my field training officer was in  
13 that unit and he let me know about it, so I applied for  
14 it. Yes, sir.

15 Q. And by that time, I guess, you had only been on  
16 the force for just a couple of years?

17 A. About a year-and-a-half.

18 Q. Okay. And describe to the Court what this  
19 Selective Enforcement Unit was all about.

20 A. Well, a Selective Enforcement Unit was a small  
21 group of officers working plainclothes, unmarked cars. We  
22 attacked high-crime grid areas. We called them "grids."  
23 We attacked the high -- we targeted crimes that were  
24 high-activity crimes that were going on in particular  
25 neighborhoods and areas. We worked a lot of stakeouts,

1     that sort of thing.

2           Q.     Were those dangerous assignments with the  
3     selective unit?

4           A.     It was pretty dangerous, yes, sir. We did a lot  
5     of stakeouts. We did a lot of -- we were able to do a lot  
6     of crime -- come across crimes in progress. We would do  
7     stakeouts, that sort of thing.

8           Q.     Far greater danger?

9           A.     Yes, sir.

10          Q.     Far greater responsibility?

11          A.     Yes, sir.

12          Q.     And more training in order to handle those  
13     things?

14          A.     Yes, sir.

15          Q.     How long did you work in that particular unit?

16          A.     I was in with that unit for about two years.

17          Q.     Now, working those types of high-risk crimes,  
18     volatile situations?

19          A.     Yes, sir.

20          Q.     Anxiety?

21          A.     Very anxiety-producing, yes, sir.

22          Q.     Was it far -- even far more anxiety-producing  
23     than the first year and a half that you had with the force  
24     there working patrol?

25          A.     Well, I think in SEU we got there quicker or

1 perhaps sometimes while the crime was going on. Where, in  
2 patrol, most of the time you get there kind of after it's  
3 over with.

4 Q. So doing stakeouts and robberies and what have  
5 you, you're having to intervene during very stressful  
6 situations?

7 A. Yes, sir.

8 Q. Who was your sergeant in that unit?

9 A. John Brannigan.

10 Q. Tell me about that sergeant.

11 A. He was my mentor, one of my mentors. He was a  
12 good guy. He was well liked around the department. He  
13 was very knowledgable in what he was trying to do.

14 Undercover work is quite a bit different than  
15 working patrol, so they had a good training program. It  
16 gave me some good insight into what the expectations were,  
17 that kind of thing.

18 Q. So you were in Selective Enforcement for a  
19 couple of years?

20 A. Yes, sir.

21 Q. And what led you to another division?

22 A. I had -- I had started pursuing fugitives. We  
23 found out we had a very high recidivism rate on people who  
24 had warrants on them, so I started in a pursuit of  
25 fugitives, people that were wanted on warrants already.

1           Q.    Tell the Court why -- at that moment in your  
2   career, why this fugitive issue was an important issue for  
3   the department.

4           A.    Well, it was -- the crime in that time period  
5   was pretty high, and there was a lot of analysts trying to  
6   figure out exactly -- what the causation was, who was  
7   doing it, that sort of thing. And I had a little bit of a  
8   heads-up on the fact that recidivists had been identified  
9   that were people that had been in jail before or people  
10   that actually had warrants, which we kind of knew anyway,  
11   that were also committing crimes.

12          Q.    And was there a department at that point in time  
13   at TPD that would handle just strictly warrants?

14          A.    No, sir, there wasn't.

15          Q.    Okay. Did you approach someone in an effort to  
16   try to start a program that would help in that regard?

17          A.    Yes, sir, I did.

18          Q.    And who did you approach?

19          A.    Well, I approached my sergeant first, and then  
20   ultimately the captain and the major for that division.

21          Q.    And what did you propose to them?

22          A.    I proposed that they give me a little freedom so  
23   that I could pursue some of the folks that were wanted,  
24   and they liked the idea and gave me the opportunity.

25          Q.    What division were you working at at this point

1 in time? Were you still in Selective Enforcement? Had  
2 you moved over into another division? Where -- what was  
3 your official unit that you were supposed to be working  
4 out of?

5 A. I was still in the Selective Enforcement Unit.  
6 At that time, it was part of the Patrol Division.

7 Q. Okay. And so you started off on your own trying  
8 to find fugitives?

9 A. Yes, sir.

10 Q. A dangerous aspect of your employment?

11 A. Well, most of the folks that you go after, they  
12 know you're coming.

13 Q. And so you were at least initially geared toward  
14 doing that yourself?

15 A. Yes, sir.

16 Q. Did you, at some point in time, either request  
17 or were you given some help?

18 A. I had some pretty good success with it. It was  
19 successful enough to where another officer was assigned to  
20 me, and ultimately it ended up being about three of us  
21 that were doing it.

22 Q. And they actually -- the Tampa Police Department  
23 formed a unit specifically for the seeking and arresting  
24 of fugitives?

25 A. At that point, yes, sir. It really didn't



1     become a formal -- like, a formal division, at that point,  
2     but after I was transferred out they continued the  
3     program -- for, as far as I know, they're still doing it.

4           Q.     Now, as a result of spearheading this particular  
5     program, did that help you in your advancement there with  
6     TPD?

7           A.     I had some pretty good successes, and it was  
8     recognized by the detective division, so I had an  
9     opportunity during that two years to spend some 30 --  
10    60-day, sometimes 90-day temporary assignments to the  
11    detective division to fill in if detectives were sick,  
12    injured or tied up for -- or shorthanded, that sort of  
13    thing.

14          Q.     And did that spearhead you into a opportunity  
15    for advancement?

16          A.     Yes, sir. I had an opportunity to go to the  
17    detective division about two years after I got into the  
18    selective enforcement unit.

19          Q.     So then, if my calculations are correct, you  
20    went into the detective division a mere three-and-a-half  
21    years after you started working as a patrol officer for  
22    Tampa Police Department?

23          A.     Yes, sir. That's about right.

24          Q.     And what division were you selected to  
25    participate in as a detective with the Tampa Police

1 Department?

2 A. At that time, it was called the Homicide/Robbery  
3 Bureau.

4 Q. So three-and-a-half years into your law  
5 enforcement career, you're selected to go into the  
6 Homicide/Robbery Bureau?

7 A. Yes, sir.

8 Q. Was that one of the high-priority divisions  
9 within the Tampa Police Department?

10 A. At that time, yes, sir. I think they still have  
11 some distinction around the country, the homicide folks  
12 do.

13 Q. So what was your assignment now in homicide?

14 A. When you first get there, you're usually  
15 assigned a detective to sort of work -- learn your way  
16 around. They send you off to a few schools to get your  
17 feet on the ground.

18 It was a pretty small unit at that time. There  
19 was probably only about nine or ten guys. And basically  
20 what you do is anybody that comes across something that's  
21 kind of a hot type of crime or something that's going to  
22 take a lot of latent investigation, then you would just  
23 kind of jump on board with that guy and help him work  
24 through that case.

25 Q. So sort of when you first started in this unit,

1     you were kind of helping those that were far more  
2     experienced than you were in their work in trying to solve  
3     homicides?

4             A.     Yes, sir.

5             Q.     Okay. Did you learn in that program?

6             A.     Well, yes, sir, I did. And we also  
7     investigated, you know, felony assaults, homicides,  
8     robberies, and adult sex crimes, so you kind of build a  
9     pretty good base for learning how to investigate.

10            Q.     In those particular divisions, did you -- were  
11    you also exposed to some of the tragedies that happen in  
12    our community concerning injuries that people face, either  
13    in a robbery or in a serious aggravated battery, those  
14    types of things?

15            A.     Yes, sir, I was.

16            Q.     Did you see some of the injuries that were  
17    caused by the human hand?

18            A.     Absolutely, yes, sir.

19            Q.     Or by an object that was either used to hit or  
20    to throw at someone?

21            A.     Yes, sir.

22            Q.     And did those activities by individuals that  
23    committed those crimes -- those activities result in  
24    serious bodily injury?

25            A.     Yes, sir. And death, yes.

1           Q.    You worked as a homicide/robbery detective for  
2 how long?

3           A.    I was in the detective division for about six  
4 and a half years and I think probably about five years or  
5 thereabouts.

6           Q.    In homicide?

7           A.    Yes, sir.

8           Q.    In 1973, what happened?

9           A.    I think '73 or '74, I had my gall bladder  
10 removed, so I was off work for about six weeks, six or  
11 seven weeks.

12          Q.    When you came back from that particular surgery,  
13 what was happening in and around the town of Tampa that  
14 resulted in you having to be assigned to a particular type  
15 of crime?

16          A.    Well, before I left homicide, I was  
17 investigating large-scale fuel thefts that were basically  
18 armed robberies, in some cases, kidnappings. And I had  
19 worked some pretty high-profile robbery cases on armored  
20 cars in the grocery stores, so I had kind of built a  
21 little bit of expertise in some of the high-dollar stuff  
22 and how to detect it.

23                So when I came back, the captain -- at that  
24 time, it was called the Larceny Bureau, and I think it  
25 might have also been called General Investigations -- they

1 had some high-profile steel thefts from some steel plants  
2 and stuff like that, so they asked me to see if I could do  
3 something with those cases.

4 Q. You're talking about million-dollar thefts?

5 A. In some cases, yes, sir.

6 Q. So when you came back from your gallbladder  
7 surgery, did they ask to you focus on these types of  
8 investigations?

9 A. Yes, sir.

10 Q. And while you were focusing on these particular  
11 types of investigations, what division were you in? Were  
12 you still in homicide? Were you being lent out to another  
13 division? How was that process working?

14 A. I was assigned -- at that point I was still in  
15 the detective division, still assigned as a detective. I  
16 was just working in a different bureau.

17 Q. Just what?

18 A. Just working in a different bureau.

19 Q. Okay.

20 A. They were called bureaus at that time.

21 Q. And how long were you in that particular bureau  
22 working in that fashion?

23 A. Probably late '75 into '76.

24 Q. Okay. Now, in '75, '76, do you get a promotion?

25 A. Yes, sir.

1           Q.    And would you tell the Court what promotion you  
2   received in 75, '76?

3           A.    I was promoted to a sergeant in the patrol  
4   division.

5           Q.    When someone gets promoted to the position of  
6   sergeant in their detective division, what happens within  
7   that department? Do you leave that detective division?

8           A.    Yes, sir.

9           Q.    Tell the Court what happens physically when you  
10   become a sergeant, for example.

11          A.    Well, when you're promoted to sergeant, you end  
12   up back in the patrol division. You're supervising a  
13   squad of officers which could be -- at that time it was  
14   either 10 or 12 people. They work a zone in the city  
15   somewhere, and you supervise, train and maybe evaluate  
16   those officers.

17          Q.    Throughout all of this period of time, are you  
18   taking training courses in order to advance your own  
19   skills within the department?

20          A.    Yes, sir. I am.

21          Q.    Okay. And are those both in-house training  
22   courses, as well as training courses outside of the  
23   department?

24          A.    Yes, sir. There's-- the department had training  
25   programs for almost all of the officers. There was an

1 incentive program at the time that kind of encouraged you  
2 to seek training.

3 I was also going to college. I started in '72  
4 and graduated in '76.

5 Q. Okay. So let's talk a little bit about that.

6 You started in 1972 to go to college. Was that  
7 the benefit of that GI bill?

8 A. That was that GI bill, yes, sir. And they also  
9 had at that time a law enforcement educational program.

10 Q. And so where did you start your college studies?

11 A. I started at Hillsborough Community College.

12 Q. And after finishing at Hillsborough Community  
13 College, where did you go?

14 A. University of Tampa.

15 Q. Okay. Did you graduate from the University of  
16 Tampa?

17 A. Yes, sir. I did.

18 Q. And did you graduate magna cum laude?

19 A. Yes, sir, I did.

20 Q. While you were at the University of Tampa  
21 graduating magna cum laude, were you married?

22 A. Yes, I was.

23 Q. And did you have children?

24 A. Yes, sir.

25 Q. And were you working the details that you've

1 just explained to the Court during that period of time?

2 A. Yes, sir.

3 Q. So you're promoted now to sergeant, so you're  
4 back now on the road?

5 A. Yes, sir.

6 Q. Do your responsibilities change as a law  
7 enforcement officer or a detective when you become a  
8 sergeant now on the road?

9 A. Yes, sir.

10 Q. And how do your responsibilities change?

11 A. Well, you're supervising officers now, so you  
12 have to be alert to all their needs. You have to provide  
13 the training that they had to respond to the calls, if  
14 it's an off-call that they have. You try to give them the  
15 support that they need to be able to function in their  
16 capacity as a patrol officer.

17 Q. So now you're not only responsible for your own  
18 safety --

19 A. Yes, sir.

20 Q. -- but you're responsible for who else's safety?

21 A. The squad.

22 Q. Did you take that responsibility seriously?

23 A. Absolutely.

24 Q. Okay.

25 A. Yes, sir. I did.



1           Q.    In being the sergeant, supervising members of  
2           your squad, were you able to recognize the strengths and  
3           weaknesses of your men?

4           A.    Yes, sir.  Part of your responsibility was to  
5           maintain a file if they had issues or if they did some  
6           good things or if they got accolades from some particular  
7           group.  So you had a pending evaluation file and each year  
8           you had to perform an evaluation on each officer.

9           Q.    And those officers who had weaknesses, what  
10          would you do in an effort to change those weaknesses?

11          A.    Well, you would try to develop that officer in  
12          the areas that you perceived as a deficiency.

13          Q.    Was that a necessary component for you?

14          A.    It was for me.  I did.  I tried to -- you know,  
15          I tried to find schools that they could attend, that sort  
16          of stuff, to try to help in their weak areas.  Yes, sir.

17          Q.    Did those sergeants before you also help you --

18          A.    Absolutely.

19          Q.    -- throughout your career?

20          A.    Yes, sir.  They did.  I learned from almost  
21          every supervisor that I worked for.

22          Q.    In 1976, you're a sergeant in patrol?

23          A.    Yes, sir.

24          Q.    Are you gathering some knowledge of what's  
25          happening in our country, around the world in reference to

1 violent crimes?

2 A. Yes, sir, I am.

3 Q. Tell the Court what happened in 1976 that  
4 furthered your career.

5 A. Probably in '75 or '76, there was a lot of  
6 issues that were going on around the country that were  
7 difficult for law enforcement agencies to handle, because  
8 they didn't have the people that were trained in the  
9 particular expertises that they needed to be able to deal  
10 with those situations. Most of them were of a violent  
11 nature, so I made a proposal to the department.

12 Q. Okay. Before making that proposal to the  
13 department, did you call other departments in an effort to  
14 educate yourself in what other departments were doing?

15 A. Yes, sir, I did. I researched the issue. There  
16 was a lot of violent crime that was occurring in an  
17 unusual manner that would -- it was difficult for the  
18 average agency to be able to deal with. So I made phone  
19 calls around the country, I -- the agencies that had  
20 problems like that.

21 And I checked with the FBI, I used them as a  
22 liaison, and they gave me information. There was  
23 information through other agencies and other departments  
24 that helped me build a little bit of a background to  
25 identify those types of issues and some solutions.

1           Q.    And one of the solutions that you came up with,  
2 was that the SWAT program?

3           A.    Yes, sir, it was.

4           Q.    Explain to the Court what the SWAT program is  
5 all about.

6           A.    Well, the SWAT program is, generally, a group of  
7 officers that are specially trained and specially equipped  
8 to deal with high-risk situations. That's kind of it in a  
9 nutshell. You kind of get called in when the patrol  
10 officers -- it's too hazardous, or the patrol officers are  
11 not equipped or trained to handle that particular type of  
12 offense.

13          Q.    At that point in time, did the Tampa Police  
14 Department have a SWAT unit?

15          A.    No, sir.

16          Q.    Did you believe that that unit was necessary for  
17 the continued enforcement and the protection of our  
18 community?

19          A.    Yes, sir, I did.

20          Q.    And tell the Court exactly what you did in 1976  
21 in an effort to try to make that happen for our community.

22          A.    The major of the division that I worked in at  
23 that time and I had a conversation. I showed him the  
24 proposal that I had, the research that I had conducted,  
25 and he liked the idea and wanted to take it to the chief

1 and see what had happened -- what could happen or what we  
2 could do with that kind of information, and then that's  
3 what he did.

4 Q. Now, at this time, you were just a sergeant in a  
5 patrol squad?

6 A. Yes, sir.

7 Q. So when the chief got ahold of your proposal,  
8 did you have a conversation with the chief?

9 A. Yes, sir, I did.

10 Q. And what was it that the chief wanted you to do  
11 now?

12 A. The chief liked the proposal. He read the  
13 documents that I had. He was well aware of what was going  
14 on in the world. He thought it was a -- an opportunity  
15 for our department to be prepared to protect our community  
16 then and in the future.

17 He gave me the okay to -- to research how to  
18 form one, what to do with it, what kind of training, what  
19 the selection process would be with the officers, what  
20 kind of equipment we needed and that kind of stuff.

21 Q. So he assigned you the task of actually starting  
22 that program and designing that program and implementing  
23 that program?

24 A. Yes, sir.

25 Q. Had you had any experience in doing that before?

1           A.    No, sir.

2           Q.    And so how did you go about doing that process?

3           A.    I tried to identify as many areas as I could  
4           that had information that would help me out. I went to  
5           agencies that had SWAT teams already established, which  
6           there really wasn't that many of them around in the mid  
7           '70s. I got information from them. I talked with their  
8           trainers. I talked with their team leaders. I included,  
9           again, the FBI which had helped me out before.

10                   There were several other organizations. The  
11           National Rifle Association at that time was the big  
12           qualifier, the big sort of certificate -- they gathered  
13           information from all over the country, from IAPC,  
14           International Association of Police Chiefs, things like  
15           that, and kind of put it all together.

16                   I made some liaisons there. They sent me  
17           information and data that they were able to put together  
18           for me.

19           Q.    Now, you're trying to gather all of this  
20           information from agencies throughout the country, but you  
21           have one more responsibility and that's, now, who's going  
22           to train your men?

23           A.    Right.

24           Q.    And so how were you going to tackle that  
25           problem?

1           A.     Well, when I looked into the training, there  
2 weren't too many people around that had the type of  
3 training that we needed, so I suggested that we select  
4 some officers and that we look at some specialized  
5 training and start sending officers to that training with  
6 the idea in mind that they would attend that training,  
7 learn everything that they could, bring back that  
8 information, and train the officers.

9           Q.     So who were the officers that were going to have  
10 to go get that training and then bring it back?

11          A.     That was primarily myself and another sergeant,  
12 that he was going to help put the team together. He  
13 helped with the research, and he and I, we set out to  
14 become SWAT trainers.

15          Q.     Did you go to various programs throughout the  
16 country in order to try to educate yourself in the tactics  
17 necessary to implement and work a SWAT team unit?

18          A.     Yes, sir, I did. The department --

19          Q.     FBI?

20          A.     Yes, sir.

21          Q.     International Association of Police Captains?

22          A.     Yes, sir. There was quite a few organizations  
23 that I went to. IAPC was one of them. FBI.

24          Q.     U.S. Army?

25          A.     The Army did some marksmanship training for us.

1           We also had -- we had our own capabilities for  
2 training firearms, and we just -- we kind of -- we did a  
3 firearms evaluation program and I set that up, and we  
4 trained -- figured out what kind of weapons that we wanted  
5 and we purchased them.

6           Q.    Now, not only was the education important,  
7 meaning, your education and this other sergeant, because  
8 you all had to, at least initially, train your men,  
9 correct?

10          A.    Yes, sir. That's correct.

11          Q.    Was it your goal to also send your men,  
12 independently of you all, to training programs as well?

13          A.    Once we had -- once we did the initial selection  
14 process, we kind of conducted our own -- we took a list of  
15 folks that had applied for the program and we went through  
16 the selection process on the individuals. And then we  
17 went through a training program to see if they could kind  
18 of pick up on what we were doing. And then we tried to  
19 send them to schools, as they became available, so that  
20 they could do the same thing.

21          Q.    Now, the selection process for individuals in  
22 such a volatile unit, a unit that was going to be, I  
23 guess, spearheading some of the most dangerous assignments  
24 with TPD, correct?

25          A.    Yes, sir, it is.

1           Q.    You had to select unique individuals to work in  
2 that program?

3           A.    That would probably be the word, yes.

4           Q.    And did you -- who set up the criteria as to who  
5 was going to be selected for the tactical squad of the  
6 Tampa Police Department?

7           A.    I did.

8           Q.    And would you tell the Court what it was that  
9 you felt was necessary, based upon your conversations with  
10 others that had SWAT teams, in the form of the right  
11 person?

12          A.    One of the things that we wanted to do was make  
13 sure that we had officers that knew already the laws and  
14 had already interacted with the community, had  
15 interpersonal skills. So we established a two-year --  
16 they needed to be an officer for at least two years.

17                We looked at physical training, and we sort  
18 of -- I kind of put it together from what I got from other  
19 agencies and tried to fit it into what I thought would  
20 work in our agency.

21                So we picked -- we went through personnel files  
22 and made sure there was no disciplinary history or no  
23 medical history that would preclude them from the  
24 training. And we talked with their supervisors and their  
25 managers, each of the candidates that had applied for the



1 job.

2 So that's -- and at one point, I think once the  
3 selection was made, I think we did a -- we had a  
4 psychologist on staff with the department, so we did a  
5 psych study on everybody.

6 Q. And what were you looking for in that psych  
7 study?

8 A. Anything that would not be something desirable  
9 for the assignment that we're about to go into.

10 Q. And did yourself and other sergeant that were on  
11 the squad, did you all, as well, take that psych  
12 evaluation?

13 A. Yes, sir.

14 Q. Why was it important for you and the other  
15 sergeant to, likewise, take the same psych evaluation and  
16 meet the same requirements as your men?

17 A. Well, there was a couple of different ways to  
18 run it around the country, and we felt that probably the  
19 best thing would be for the requirements to be the same  
20 for everybody.

21 Q. Supervisor or not?

22 A. Supervisor or not. If you ran the team or if  
23 you were the newest guy on the team or whatever, your job  
24 was to do exactly the same thing, physical training and  
25 all of the testing as everybody else.

1           Q.    How cooperative were these agencies throughout  
2 the country, including the FBI?

3           A.    Very cooperative.

4           Q.    So were you, in fact, able to design, develop  
5 and implement the first tactical squad -- SWAT team for  
6 the Tampa Police Department?

7           A.    Yes, sir, I did.

8           Q.    What was the name of that unit?

9           A.    We ended up -- it was called the Tactical  
10 Response Team.

11          Q.    Was that Tactical Response Team, meaning that  
12 you all were going to work as one cohesive unit?

13          A.    Absolutely.

14          Q.    Did you develop standard operating procedures  
15 and policies?

16          A.    Yes, sir, I did.

17          Q.    And did those get approved all the way up to the  
18 captain?

19          A.    Yes, sir.

20          Q.    The chief of police?

21          A.    Yes, sir, it did.

22          Q.    Now, you're still working a sergeant's position  
23 in patrol?

24          A.    Yes, sir.

25          Q.    As well as now also handling -- being the, I

1 guess, codirector of the Tactical Response Team?

2 A. Yes, sir.

3 Q. You and the other sergeant?

4 A. Right. We kind of divided things up. The  
5 training and the research was my area and firearms  
6 training. We took care of different things.

7 He did a lot of administrative stuff on the  
8 front end. I did most of the hands-on.

9 Q. Did that program prove to be successful?

10 A. Yes, sir, it did.

11 Q. Is that program still in operation --

12 A. Yes, it is.

13 Q. -- as we sit here today in 2017?

14 A. Yes, sir, it is.

15 Q. Now, in 1980, you were promoted again; is that  
16 correct?

17 A. Yes, sir, it is.

18 Q. Could you tell the Court about your promotion in  
19 1980?

20 A. I had taken the lieutenant's test, and I got a  
21 call one day that says, "You're a lieutenant," and that  
22 was about the extent of it.

23 Q. And did your position within the squad change,  
24 meaning, your position within the patrol squad, your  
25 position within the SWAT team? What changed by that

1 title?

2 A. Well, from the patrol perspective, the sergeant  
3 is in charge of a squad. A lieutenant is in charge of  
4 probably four squads, maybe five squads. It depends on  
5 what the assignment was. So you could have multiple  
6 squads and sergeants reporting to the lieutenant. That  
7 was the makeup there.

8 As far as on the team, the way it was initially  
9 designed so that we would not lose expertise as people got  
10 promoted and transferred is we tried to set it up so that  
11 no matter what rank you were, no matter where you were,  
12 you always was in -- you stayed part of the team.

13 Q. So, Mr. Reeves, now you're not only responsible  
14 for a unit or a squad of 10, 11 officers; now you're  
15 responsible for 4 to 5 squads --

16 A. Yes, sir.

17 Q. -- and the safety and the life of those men as  
18 well?

19 A. Yes, sir.

20 Q. Did you have to go through the evaluation  
21 process and make sure that those men, likewise, were well  
22 trained so that they could not only protect the community,  
23 but that they would go home at night after serving their  
24 time?

25 A. Yes, sir. I think as a lieutenant, I took the

1 job serious, so I worked closely with the sergeants to  
2 ensure that -- that they adhered to all of the rules and  
3 regulations and offered whatever assistance I could to  
4 help, if they had particular issues in their squad.

5 Q. Now, you indicated earlier that it was your main  
6 function for training of your men in the SWAT team?

7 A. Yes, sir.

8 Q. That's a group that goes into the most volatile  
9 and dangerous conditions?

10 A. Yes, sir.

11 Q. Day in and day out?

12 A. Yes, sir.

13 Q. What was your sense of responsibility with  
14 reference to that?

15 A. Well, you're in charge. Everything that goes  
16 right is your fault and everything that goes wrong is your  
17 fault, so you try to stay as informed as you can and  
18 you've got to try to keep your people as sharp and as on  
19 the edge as they can.

20 You try to keep them as well trained that you  
21 can make it happen, so that if something does happen or  
22 when it does happen, that you handle it effectively and  
23 efficiently.

24 Q. Did you continue to go to courses to teach you  
25 defense tactics and officer survival tactics during this

1 period of time?

2 A. Yes, sir.

3 Q. Did your men?

4 A. Yes, sir.

5 Q. Did you have in-house training between yourself  
6 and your men to make sure that not only you, but they were  
7 well equipped and knowledgeable on how to handle these  
8 volatile situations?

9 A. Yes, sir. The protocol was that if anybody went  
10 to a specialized class -- which, obviously, we couldn't  
11 send everybody, but when you came back, it was your job to  
12 retrain everybody on the team that -- to receive the  
13 training.

14 Plus, we also set up in-service training. We  
15 had monthly training days, and on those training days each  
16 month we would have a different -- a different protocol  
17 for the type of training that we would do to make sure we  
18 keep ourselves updated on whatever was going on.

19 Q. So you continued to be a lieutenant with the  
20 SWAT team?

21 A. Yes, sir.

22 Q. And in 1984, were you promoted again?

23 A. Yes, sir, I was.

24 Q. And in 1984, you were promoted to what rank?

25 A. Captain.

1           Q.    Okay.  What are the responsibilities now that,  
2           as a captain with the Tampa Police Department, you have  
3           undertaken as a result of that promotion?

4           A.    It kind of depends on your assignment.  If  
5           you're -- if you're in the patrol division, the city was  
6           divided in half, so you were the shift commander on  
7           whatever District I was assigned to, I was in both of them  
8           at some time or the other.

9           Q.    So now you're responsible for an entire shift?

10          A.    Now I'm responsible for an entire shift.  You  
11          have two lieutenants that work for you, and you could have  
12          anywhere from 8 to 10 squads of officers.

13          Q.    Were you also asked to serve as a liaison to the  
14          Office of the State Attorney?

15          A.    Yes, sir, I was.

16          Q.    Was that early on in your position as a captain  
17          or sometime thereafter?

18          A.    It depends on your assignment.  Normally, the  
19          liaison came out of the detective division, so when I was  
20          transferred to the detective division they asked me to be  
21          the liaison with the State Attorney, which you try to  
22          resolve issues with the State Attorney's Office that they  
23          have with the PD and vice versa.  You try to keep things  
24          working smoothly, you know, paperwork, that sort of stuff.

25          Q.    I would imagine that takes some good

1 communication skills?

2 A. Yes, sir.

3 Q. You were, in 1986, promoted as a -- now the  
4 captain of the homicide squad?

5 A. I was in homicide for a while, yes, sir.

6 Q. Okay. And, again, at that time, was that  
7 considered the -- I don't want to say the word -- the most  
8 important, because every aspect of law enforcement is  
9 important, but certainly recognized as one of the more  
10 important divisions within the department?

11 A. Well, I think that people that worked there  
12 think so. You're just a captain like anybody else, but  
13 that particular assignment may have some status to it,  
14 yes, sir.

15 Q. How long were you the captain of the homicide  
16 squad?

17 A. I really don't recollect how long I was there.  
18 I was there for a while, and then I was a captain in the  
19 larceny bureau for a while, and I don't -- I'm going to  
20 say a year or so between the two of them. I don't  
21 remember the dates or how long.

22 Q. Okay. In the late '70s and early '80s, did you  
23 become a firearms instructor?

24 A. Yes, sir, I did.

25 Q. And explain to the Court what that position



1     entailed and how you become a firearms instructor.

2           A.     The -- when we started the team, we needed  
3     specialized training in weapons and firearms, and so I was  
4     sent off to a variety of different schools to build my  
5     certification.

6           I went to some sniper schools, counter-sniper  
7     school, military school, FBI. I applied for  
8     certifications as a pistol, rifle, shotgun instructor, a  
9     home safety instructor, and all of those things go  
10    together to -- and you get a certification as a police  
11    firearms instructor, which is a little bit higher up the  
12    recognition chain than the other ones are.

13          Q.     So with this authority to instruct on firearms,  
14    what are you able to do?

15          A.     Well, you're basically able to instruct pretty  
16    much any -- in any area of firearms utilization that you  
17    can imagine, whether it's recruit academy, auxiliary  
18    academy, SWAT team, special weapons, all of that sort of  
19    stuff. You're just about certified in everything.

20          Q.     When you initially became certified, was your  
21    primary function the SWAT team?

22          A.     At that point yes, sir. Most of it.

23          Q.     And did that responsibility grow?

24          A.     Yes, sir. It did.

25          Q.     How did it grow?

1           A.    Well, we only had a certain number of firearms  
2   instructors at the time through the academy. The academy  
3   had moved from the police building by that time into -- we  
4   had our own academy at the time, so we were instructing  
5   other agencies. So we had not only in-service training  
6   classes for the department, but we also had recruit  
7   academy for other agencies, and then we had auxiliary  
8   academy as well, so firearms instruction kind of got  
9   pretty busy during that time frame.

10           So because I was involved in it, I was asked to  
11   kind of take the lead on the instruction and become, like,  
12   a program coordinator.

13           Q.    So you became the program coordinator for the  
14   firearms instructors that were going to be used for TPD,  
15   both for in-service and at the academy?

16           A.    Yes, sir.

17           Q.    Now, the exposure that you had with all of this  
18   training took place at various locations throughout the  
19   country; is that correct?

20           A.    Yes, sir. Yeah.

21           Q.    Officer survival, general -- general  
22   investigations, do you remember starting to teach yourself  
23   some of these courses at the academy?

24           A.    Yes, sir. I had picked up some expertise in  
25   some of the schools, and so I was asked to teach some

1 classes at the academy.

2 I had probably two or three different classes  
3 that I was teaching at the time, anything from general  
4 investigations to sex crimes to -- and officer survival is  
5 part of the weapons program, or I made it a part of the  
6 weapons program. So I went to officer survival schools at  
7 the time, too.

8 Q. Now, were you also a board member of the Tampa  
9 Police Pistol and Rifle Club?

10 A. Yes, sir. At that time, the Tampa Police Pistol  
11 and Rifle Club was on the property that was -- that was  
12 leased from the City. It was located off of West  
13 Hillsborough Avenue. We had a very active law enforcement  
14 program out there, and I was on the board of directors for  
15 a couple of years.

16 Q. So you are running these various segments of law  
17 enforcement as a captain there at the TPD and still  
18 running tactical; you're still running your Response Team,  
19 your SWAT team. What happens in 1988?

20 A. In 1988, I got cancer.

21 Q. And what resulted as the -- from the fact that  
22 you had developed cancer?

23 A. I ended up with a surgery and radiation.

24 Q. Okay. What was your thought process about your  
25 career as a law enforcement officer when you got cancer?

1           A.    Well, I think with the dedication that I had, it  
2 was kind of devastating.

3           Q.    What were you thinking about your future?

4           A.    Well, I was concerned about it. I guess any  
5 time you get cancer, you're crazy if you don't worry about  
6 it, and then the radiation. I was concerned that I  
7 wouldn't be able to keep doing what I was doing.

8           Q.    Which you loved to do?

9           A.    (Indicating.)

10          Q.    Did you come back to the department?

11          A.    Yes, sir.

12          Q.    What was your goal when you came back to the  
13 department?

14          A.    Well, I think you try to get your energy back.  
15 You try to get your strength back. You try to get -- you  
16 try to get yourself going again.

17          Q.    And had the doctors told you a benchmark for at  
18 least some relief for you, in your own mind, at that time?

19          A.    Yes, sir. I think the consensus of opinion was,  
20 if you were cancer-free for five years, then you were  
21 probably insurable. So, you know, you didn't want to  
22 change jobs right then.

23          Q.    So you stayed working in the department for how  
24 many years after your cancer?

25          A.    Five years.

1 Q. And was that because you wanted to make sure  
2 that you were going to be cancer-free and --

3 A. Yes, sir.

4 Q. You had benefits there at the TPD that paid for  
5 your health insurance?

6 A. Yes, sir.

7 Q. Life insurance?

8 A. Yes, sir.

9 Q. In 1991, were you asked by the chief of police  
10 to take care of a delicate situation that was taking place  
11 with vice and narcotics?

12 A. Yes, sir.

13 Q. And did the chief want you to go over there --

14 A. Yes, sir.

15 Q. -- and help things out?

16 A. Yes, sir.

17 Q. And did you?

18 A. Yes, sir.

19 Q. When you went over there as a captain of vice  
20 and narcotics, was there much help for you?

21 A. Well, when I first got there, there was a major  
22 in the division that normally would run that division, and  
23 shortly after I got there he was promoted to a temporary  
24 position. So, yeah, I was -- I was -- I ran it pretty  
25 much by myself for a year or so.

1           Q.    After your recovery from cancer, were you  
2   thinking towards retirement?

3           A.    Yes, sir.

4           Q.    And in 1993, did you retire from the Tampa  
5   Police Department?

6           A.    Yes, sir.

7           Q.    So now you think you're going to retire and  
8   you're just going to go out there and enjoy your  
9   retirement?

10          A.    That was the false hope.

11          Q.    So what happens in 1993, after you retired?

12          A.    I -- well, before I retired, I heard about a  
13   position that was becoming available locally at Busch  
14   Gardens, so I applied for it.

15          Q.    Why would you apply if you're thinking of  
16   retirement?

17          A.    Well, my wife had a few years to go in her  
18   retirement, and our plan was to work until we were 62.  
19   That's what we both wanted to do. So I said, "hey" -- I  
20   was a little bit young at 51 to be retiring anyway, and so  
21   I applied for that job and --

22          Q.    Now, when you retired, you got your benefits  
23   from TPD; is that correct?

24          A.    Yes.

25          Q.    You've been vested?

1           A.    Yes, sir.

2           Q.    So now, you saw this opportunity at Busch  
3 Gardens.  What was the actual position that you applied  
4 for at Busch Gardens?

5           A.    It was a director of security.

6           Q.    Okay.  And did you receive that employment?

7           A.    Yes, sir, I did.

8           Q.    So now you received a completely different  
9 position --

10          A.    Yes, sir, it was.

11          Q.    -- in security?

12          A.    Absolutely.

13          Q.    Tell the Court the differences as the head of  
14 security for Busch Gardens versus your positions that you  
15 had with the Tampa Police Department.

16          A.    Well, the personnel were about the same.  I was  
17 supervising somewhere between 75 and a 100-plus people, I  
18 suppose, and at one time up to 300 because of some merging  
19 of departments that I was asked to take on additional  
20 responsibility.

21                But the point was that the mission was  
22 completely different.  Even though I was still doing the  
23 same things I had done before, managing people, the  
24 mission went from a law enforcement mission into a public  
25 relations position.

1           Q.    Now, when you're saying "public relations," what  
2 do you mean by that?

3           A.    Well, you're not into enforcing the laws.  
4 You're into making people's -- when they come to Busch  
5 Gardens they want to enjoy themselves, so you try to keep  
6 a safe environment. You're more public relations  
7 oriented. Your entire philosophy changes as far as  
8 dealing with people.

9           Q.    Busch Gardens wants their customers to be happy?

10          A.    Absolutely. Yes, sir.

11          Q.    To be safe?

12          A.    Yes, sir.

13          Q.    And how you handle those customers is extremely  
14 important?

15          A.    We had about 3 or 4 million people come in a  
16 year, so yes. Yes. You don't -- you've heard the  
17 customer is always right, and that's pretty much the  
18 philosophy there. You try to deal with things as  
19 carefully as you can. You try not to upset the apple  
20 cart, so to speak. You want to do the right thing. You  
21 want to train your people to do that, and that was part of  
22 my responsibility.

23                   One of the reasons they hired me was for  
24 training, so that's one of the things that we did. We  
25 trained the officers how to effectively do that.



1 Q. You're talking about security officers?

2 A. Yes, sir.

3 Q. Not high-paying security officer positions?

4 A. Not as high paid as law enforcement, yes, sir.

5 Q. And now you were having thousands upon thousands  
6 of people that were coming into this park that you were  
7 going to have to interact with?

8 A. Yes, sir.

9 Q. Your group was going to have to interact with?

10 A. Yes, sir.

11 Q. And you had to provide that group with a  
12 positive experience?

13 A. That was the goal, yes, sir.

14 Q. An enjoyable experience?

15 A. That was it.

16 Q. There was one more issue there at Busch Gardens.  
17 It was the alcohol issue?

18 A. Yes, sir.

19 Q. Tell the Court what the alcohol issue of Busch  
20 Gardens was.

21 A. Well, Busch Gardens gives away -- gave away free  
22 beers. That created a rather unique set of circumstances  
23 when you're trying to balance the free alcohol with the  
24 guest experience. So I think it became quite a unique  
25 opportunity to learn something new.

1 Q. Families dominated those amusement parks?

2 A. Families were -- yes, all age groups, all  
3 nationalities, all everything.

4 Q. Children --

5 A. Yes, sir.

6 Q. -- getting lost?

7 A. Yes, sir.

8 Q. Frantic parents?

9 A. Yes, sir.

10 Q. Who trained those individuals that worked for  
11 you in an effort to deal with those very delicate and  
12 sensitive issues?

13 A. I had a good staff that had a good depth of  
14 experience. They were a tremendous asset. I hired law  
15 enforcement officers. I hired law enforcement that  
16 were -- that had expertise in the particular areas that --  
17 that I needed training. They provided the training for us  
18 or to my manager so that they could share it with the  
19 employees.

20 Q. Did you also implement security measures for  
21 theft?

22 A. Yes, sir.

23 Q. That was also one of your areas of expertise --

24 A. Yes.

25 Q. -- at TPD?

1           A.    Yes, sir.

2           Q.    When you arrived there at Busch to be the head  
3 of security, did they have any systems -- sophisticated  
4 system, in order to monitor theft by employees, as well as  
5 patrons?

6           A.    They had a -- in the security department they  
7 had a -- they had a couple of investigators. I brought in  
8 security cameras. I brought in cameras that could be  
9 easily concealed. I brought in a hidden camera program to  
10 work with employee theft.

11                   We concentrated on the large thefts. Obviously  
12 if you've got 30, 40,000 people in your park and you have  
13 some retail establishments you're going to have some  
14 thefts, so we started a theft program, not just for our  
15 employees but also for the guests. That was one of the  
16 things that we implemented.

17           Q.    Did you also work with the community concerning  
18 issues that would arise with Busch Gardens?

19           A.    Yes, sir. If there were problems with the  
20 neighborhood because of traffic or whatever, I was -- I  
21 would usually go out and visit with them and try to  
22 resolve the issues with them.

23                   I also worked with the -- I think the National  
24 Safety Council had an office over there. I had a building  
25 across the street that wasn't being utilized, so we

1     allowed the Tampa Police motorcycle unit to use that at  
2     our expense.

3             We allowed -- I think there was a neighborhood  
4     watch program and maybe even a Chamber of Commerce, and we  
5     allowed them to use that building, and so I liaised with  
6     those folks.

7             Q.     Now, while you were working head of security for  
8     Busch Gardens, did you stop your training and just use  
9     whatever training you had received with the department?

10            A.     No, sir. I didn't. When you move from the law  
11     enforcement arena into the private security, that's a  
12     different -- it's completely different.

13            There was several professional work  
14     organizations that I joined. One was American Society for  
15     Industrial Security, which was -- I joined that almost as  
16     soon as I found out about it. And then there was another  
17     one that was indicative, pretty much, of the theme parks  
18     all over the country, and that was the American Society  
19     for Amusement Park Safety and Security.

20            So I joined those two organizations and I found  
21     out what they were doing, where they were doing it, and I  
22     started taking classes that would enhance me towards  
23     our -- my learning curve into the areas that was of  
24     interest in that industry.

25            Q.     Mr. Reeves, I'm going show you, first of all,

1 what's been marked as Defendant's Exhibit Number 206, and  
2 it goes all the way, A through Z and double A through  
3 double Z and triple A through M. It's a composite  
4 exhibit. I ask you if you recognize that exhibit.

5 A. Yes, sir, I do.

6 Q. Okay. What is that an exhibit of?

7 A. These are probably three-quarters of the  
8 certificates that I acquired throughout my career, both at  
9 Tampa PD and while I was at Busch Gardens and activities  
10 that I was involved in. I'm going to say that's most of  
11 them. There may be a dozen or so that I'm aware of that I  
12 don't have.

13 Q. I'm going to show you now a Busch Gardens one  
14 which is Defendant's Exhibit Number 205, and it's a  
15 composite exhibit of 25 pages, A through Y, and ask you if  
16 you recognize these exhibits.

17 A. Yes, sir. These are the schools that I attended  
18 and the certificates that I acquired, the certifications  
19 that I had while I was working at Busch Gardens.

20 MR. ESCOBAR: Your Honor, we would move both  
21 Defense Exhibit Number 206, as well as Defense  
22 Exhibit 205 into evidence, I believe without  
23 objection.

24 MR. MARTIN: It's part of our stipulation, isn't  
25 it?

1 MR. ESCOBAR: Yeah, it is.

2 MR. MARTIN: Yes.

3 THE COURT: Okay. They will be admitted.

4 What's the number?

5 THE CLERK: 32 and 43.

6 MS. SUMNER: What was the number, Mr. Escobar?

7 MR. MARTIN: 42 and 43. I'll tell you as soon  
8 as I see it.

9 MR. ESCOBAR: 42 is the certificates for law  
10 enforcement. 43 is Busch Gardens.

11 Mr. Shah, would you hold one up?

12 No, that's not connected? So that's right.

13 That's right.

14 BY MR. ESCOBAR:

15 Q. Mr. Reeves, I'd like you to turn, if you can,  
16 just slightly, keeping -- please keep in mind that the mic  
17 is going to be here, so I'm going to scoot it just a  
18 little bit so that we don't lose your voice in the  
19 process, and I'm going to show you the U.S. Naval  
20 Submarine School Certificate.

21 What is that?

22 A. That's the certificate that I got when I  
23 graduated from submarine school right after high school.

24 Q. Okay. Could you please mark that for the  
25 record. The qualified in submarine certificate?

1           A.    Well, after you're assigned to the submarine,  
2   you have a window of opportunity there that you must  
3   qualify yourself in submarines, that you need to find out,  
4   research, study, and take a test on all the operational  
5   systems on a submarine. That's a certificate that I got  
6   when I qualified.

7           Q.    Okay. Navy training course certificate?

8           A.    Those are -- those are the training courses that  
9   you need to take for -- for advancement in the military.  
10   That's a notification of the testing and the classes.

11          Q.    Another?

12          A.    Yes, sir. That's another training certificate.  
13   Some of those are optional and some are mandatory, if you  
14   want to be promoted. So every opportunity that I got, I  
15   signed up for whatever they had to offer.

16          Q.    Okay. What is this?

17          A.    That's the certificate that I received from the  
18   police academy with 328 hours of training in the academy.

19          Q.    Tampa Police Department Certificate of  
20   Outstanding Achievement for Recruit in the Class of -- it  
21   looks like Number 14.

22          A.    Yes, sir. That was a -- that I alluded to  
23   earlier. That was the certificate for being, I guess, the  
24   best all around in all of the different areas of  
25   evaluation during the academy.

1           I think my son won the same award, but it had a  
2 little different name.

3           Q.    This one says, "The Florida Institute for Law  
4 Enforcement Certificate of Completion."

5                   What was this?

6           A.    This is a dedicated training program. They used  
7 to have a kit that you put together. It was the way that  
8 you made a composite when you were not an artist. It had  
9 different components to it, so training school would teach  
10 you how to make a composite picture of a suspect.

11          Q.    This is, likewise, the Florida Institute for Law  
12 Enforcement at St. Pete JC, interviewing and  
13 interrogation.

14          A.    Yes, sir. I think that was -- at the time it  
15 was called a reinterview and interrogation technique,  
16 which was pretty much the standard around the country.

17                   I had been to a preliminary class. This was, I  
18 guess, sort of like an addendum or maybe a little bit more  
19 advanced class in interviewing and interrogation.

20          Q.    Hillsborough Community College Associate of Arts  
21 Degree in Pre-Police Science and Administration.

22          A.    Yes, sir. That was the degree that I got at  
23 Hillsborough Community College.

24          Q.    And that was in 1974?

25          A.    Yes, sir. Yes, I started in '72 and I graduated



1 in '74.

2 Q. Now, when you were going to college, were you  
3 going to college, just to a class here or a class there?

4 A. No, sir. Once -- if you know dealing with the  
5 federal government paperwork, once you get into the system  
6 you better stay there. So when I started in 1972, I went  
7 through -- if the doors were open to the college, I was  
8 there. I went three-quarters time year-round until I got  
9 my degree in 1976.

10 Q. While you were working full time?

11 A. Working full time, getting called out and trying  
12 to raise two kids.

13 Q. State of Florida Police Standards Council Career  
14 Development -- Career Develop Certificate for Intermediate  
15 Training?

16 A. Yes, sir. They had a program at that time, it  
17 was an incentive program, and you could enhance your  
18 finances minimally, but you could get some money from the  
19 State by taking different classes, so I signed up for  
20 everything that was available.

21 Q. I would imagine back in your time as a law  
22 enforcement officer with the TPD -- Tampa Police  
23 Department you weren't getting paid a whole lot?

24 A. You took every opportunity to make some extra  
25 money.

1 Q. Okay.

2 A. And those programs were -- they were around, but  
3 they were hard to get into, so you had to put in for them  
4 a long time ahead of time. So that is an advanced  
5 training certificate.

6 I mean, they give you beginner, intermediate,  
7 advanced. They elaborate. They get more sophisticated as  
8 you go. It prepares you to do a better job at what you're  
9 doing.

10 Q. State of Florida, the Commission on Police  
11 Officer Standards and Training. This was an instructor  
12 certificate. What is that?

13 A. As I got involved in the detective division with  
14 the training -- through the training department and as I  
15 got the SWAT team going, you kind of needed some  
16 instructor classifications in order to be able to teach  
17 some of the classes to some of the folks that were coming  
18 in to see if other agencies and that sort of thing. So it  
19 was -- that's kind of like a state teaching certificate  
20 for law enforcement related class.

21 Q. "This is to certify that Curtis Reeves has been  
22 duly elected as a member of --

23 A. That's Alpha Chi. That's the National Honor  
24 Society. I got that. I was inducted into that when I  
25 graduated from the University of Tampa.

1           Q.    University of Tampa degree, Bachelors of  
2   Science, magna cum laude?

3           A.    Yes, sir.

4           Q.    And you graduated magna cum laude in what year?

5           A.    1976.

6           Q.    Department of the Army, Certificate of Training,  
7   Tampa Police Department.  Successfully completed the  
8   marksmanship in tactical training on May the 23rd of 1977  
9   through May the 26th of 1977.

10          A.    Yes, sir.  This was some of the special weapons  
11   classes that we brought instructors in to help us with.  
12   The Army was very kind to me and actually sent me a couple  
13   of instructors so we could have a school.  Our facility  
14   was -- cut down the cost from the government, so that was  
15   probably one of the first classes, not necessarily the  
16   first class in weaponry, but one of the first classes in  
17   long gun utilization.

18          Q.    State of Florida Police Standards, again,  
19   Certificate of Recognition?

20          A.    Yes, sir.  Those were classes that were  
21   available to you.  Some were required and some weren't,  
22   and I don't remember if this was or wasn't.  But anyway,  
23   it was a training.  It enhanced your abilities to do the  
24   things that you were hired to do.  It kept you up to date  
25   on laws and that sort of stuff.

1 Q. Okay.

2 United States Army. Completed the  
3 Sniper/Counter-Sniper Course, October of 1977?

4 A. Yes, sir. That was in Fort Benning, Georgia.  
5 That was a thousand-yard rifle range, and we were --  
6 myself and my counterpart, we were trained in the  
7 long-range utilization of rifles. So I got thousand-yards  
8 shooting. I think that was about two or three weeks long.  
9 I don't recollect.

10 Q. The National Rifle Association of America,  
11 Certified Shotgun Instructor?

12 A. Yes, sir. That was one of the certificates that  
13 I alluded to earlier. There's probably a couple of them  
14 in there. You had to have some level of experience and  
15 you had to take a test, and they gave you the -- they gave  
16 you the certification that allowed you to teach the  
17 subjects.

18 Q. National Rifle Association Certified Rifle  
19 Marksman Instructor?

20 A. Yes, sir. I met the requirements for the  
21 marksmanship instructor by virtue of the military schools  
22 and demonstrated skills, I guess you could say.

23 Q. Certified Pistol and Marksmanship Instructor.  
24 Is that the same national organization?

25 A. Yes, sir. We -- I tried to get as many people

1 as I could into handgun school. That's where you're going  
2 to spend the majority of your time in the SWAT team, so we  
3 wanted to be as proficient as we could. So that's the  
4 certification that kind of led to that.

5 Q. Law Enforcement Officers Training School,  
6 Certificate of Attendance, Sergeant Curtis J. Reeves,  
7 Hostage Negotiator?

8 A. Yes, sir. In dealing with hostage situations  
9 was the up-and-coming thing. That kind of was the impetus  
10 for kind of getting the team off the ground.

11 Q. The SWAT team?

12 A. Yes, sir, the SWAT team off the ground. So this  
13 was the school that gave us the background and the  
14 information that we needed to understand the dynamics of a  
15 hostage situation.

16 Q. Federal Bureau of Investigation Training School,  
17 Certificate of Attendance, Special Tactical Firearms  
18 School. From 1977, June, to July of 1977?

19 A. Yes, sir. Those are the -- that's kind of what  
20 I alluded to. Those are -- to develop your proficiency,  
21 they include officer's survival, use of cover and  
22 concealment, those -- that type of information which is  
23 pretty important to a SWAT team. That's really important  
24 to anybody, but particularly the SWAT team.

25 Q. The National Rifle Association of America,

1     again, Police Firearms Instructor, 1978?

2           A.     Yes, sir. That's a certification there, you had  
3     to meet certain requirements to be able to get that  
4     certificate, and at that point, I had the skills and I had  
5     the requirements.

6           Q.     Okay.

7           A.     And you had to be sponsored by your law  
8     enforcement agency as well.

9           Q.     Hillsborough Community College, completed a  
10    criminal justice course. This was -- it looks like in  
11    1979, Curtis J. Reeves?

12          A.     Yes, sir. That was another class on vicarious  
13    liability which is, of course, always an interest to law  
14    enforcement agencies, so we tried to keep ourselves  
15    abreast of what the legal issues were so that we knew --  
16    not only was it applicable to the SWAT team, but also to  
17    the regular police work.

18          Q.     Now, that vicarious liability appears to have  
19    been taught by the Law Enforcement Institute; is that  
20    correct?

21          A.     I think that was -- yes, sir, it was. And I  
22    think there was some name changing going on there. I may  
23    be incorrect, but I think that was part of the Florida  
24    Department of Law Enforcement. At one point I think it  
25    became the Executive Institute, but, in any event, it was

1 a legal group.

2 Q. Another one that appears to have been taught by  
3 the Law Enforcement Institute, and that is Officer  
4 Survival Tactics.

5 That was done in 1979?

6 A. Yes, sir. Those are the -- again, those are --  
7 those are the kind of knowledge that law enforcement  
8 officers need. That's the kind of knowledge and  
9 information that SWAT teams need, and those are the kind  
10 of classes that I was being sent to to develop my  
11 expertise in those areas so that I could train other  
12 officers that way.

13 Q. The National Rifle Association Certified Curtis  
14 Reeves Has Completed The Sharpshooter -- Police  
15 Sharpshooter School, 1980?

16 A. Yes, sir. That was a class that was, I think,  
17 over in Pinellas County. And again, it was a skills  
18 development course.

19 Q. And the National Rifle Association is an outfit  
20 out of Washington, D.C.; is that correct?

21 A. Yes, sir, it is. At that time, they were very  
22 prevalent in the law enforcement training arena. They  
23 were one of the few agencies that really had put together  
24 the information that law enforcement agencies needed to --  
25 for their skills development.

1           Q.    "This is to certify that Curtis Reeves has  
2 completed the Police Firearms Instructor School," and this  
3 was again by the National Rifle Association of America,  
4 and it looks like this is also 1980.

5                   It says there that you have scored an 86 percent  
6 or more on the 60-round modified 25-yard double action PPC  
7 course?

8           A.    Yes, sir, it does. That's the -- that's  
9 Pinellas Police Academy. Again, that's a skill  
10 development class. That -- that really isn't that good of  
11 a score. I had a weapons problem. Anyway, it was a  
12 skills development course. The weapon that I had had some  
13 malfunctions with it, but it's still a passing score.

14           Q.    Okay. The NRA Home Firearm Responsibility  
15 Instructor, what is that about?

16           A.    I -- through the Tampa Police Pistol and Rifle  
17 Club, I taught handgun safety courses to the public for  
18 probably about four or five years. I took 30 students at  
19 a time once a month and we ran a handgun safety course.  
20 That was a requirement that I -- that I fulfilled to give  
21 me an extra credential for instructing through the pistol  
22 club to that group of people.

23           Q.    Again, the Law Enforcement Institute, this being  
24 in 1980 as well, a seminar on civil laws and liabilities?

25           A.    Yes, sir. Again, just trying to stay abreast of



1 current laws, and I would reflect on law enforcement  
2 actions. Something that, as a manager, you almost have to  
3 know. You're making decisions that you need to know  
4 those -- how those things will impact your actions.

5 Q. Okay. State of Florida, the Commission on  
6 Police Officers Standards and Training, Specialized  
7 Training Certificate for Instructor's Techniques to Curtis  
8 Judson Reeves?

9 A. Yes, sir. In order to teach, you needed to have  
10 an instructor technique course, and then you needed to  
11 update yourself periodically to stay current with your  
12 teaching certificate.

13 Q. And in those particular courses, were they  
14 teaching you some of the various things that we've talked  
15 about all along?

16 A. Yes, sir, they did.

17 Q. Including officer survival?

18 A. I'm thinking that one is probably more on  
19 presentation to students, the instructor technique. I  
20 think it's how to make you a better instructor, how to use  
21 training aids to capture the attention of your students,  
22 that sort of thing.

23 Q. Okay. Tampa Police Academy Advanced Training  
24 Certificate, Instructor Techniques. Again, 1979. I think  
25 I had one of those out of order there.

1           A.     Yes.   That was a class sponsored by the  
2     department.   It's pretty much the same thing.   We try to  
3     keep the instructors at the academy, I guess you could  
4     say, on the cutting edge.   It's kind of easy to have two  
5     hours' worth of material in a four-hour block.   We tried  
6     to have four hours of material in a two-hour block, and in  
7     order for the students to capture it, they taught you how  
8     to use all these available training aids to keep the  
9     students' attention.   Cops are -- it's kind of hard to  
10    keep their attention.

11           Q.     Public Safety Educators, Los Angeles,  
12     California.   I guess, by this time, you were Lieutenant  
13     Curtis J. Reeves.

14                   What was this about?   Survival techniques again?

15           A.     Yes, sir, survival techniques.   That's -- that  
16     was rising and that -- there was a need for that, that was  
17     arising in the mid '70s.   There was a lot of classes going  
18     around, and I tried to avail myself or officers or people  
19     that worked for me to do as many of those as we could.

20                   That was a very important time for law  
21     enforcement, I guess kind of like today is, you know.  
22     Officer survival was -- a lot of agencies had lost  
23     officers.   We lost officers in Tampa, so it was a very --  
24     that was the up-and-coming thing, was to teach your  
25     officers how to go home every night, you know.

1           Q.    Federal Bureau of Investigation Training School,  
2   Effective Communication?

3           A.    Yes, sir.  That's how to communicate clearly and  
4   concisely to your subordinates and to your peers, both  
5   verbally and in -- with documentation, keeping an eye on  
6   the legalities of the issues and that sort of stuff.

7           Q.    International Association of Chiefs of Police.  
8   I believe you mentioned this organization earlier.  This  
9   was a class on -- shooting classroom and range  
10  instruction?

11          A.    Yes, sir.  That was a specialized class in  
12  Wilmington, North Carolina, with a variety of federal  
13  agencies.  I think I was probably the only one there from  
14  a municipal agency.

15                It was a class, I think, primarily for federal  
16  weapons officers or weapons trainers.  It had some  
17  components of officer survival, carrying concealment, how  
18  to use cover and concealment, whether it's a protective  
19  cover or a concealing cover, that sort of thing.

20          Q.    Law Enforcement Officers Training School,  
21  Certificate of Attendance.  This was another anti-sniper  
22  and survival tactic school that you took in 1982?

23          A.    Yes, sir.  This was pretty much  
24  self-explanatory.  It was -- some of the weapon systems  
25  had changed in a few years there, so it was a

1 familiarization with some of the new weapons systems that  
2 were available and what was being encountered in the  
3 public by law enforcement agencies and how to -- how to  
4 kind of compensate for those kind of things.

5 Q. Fire Services Association taught this course on  
6 Vertical Rope Rescue School.

7 What is Vertical Rope Rescue School?

8 A. Well, one of the things that -- to build skills  
9 with the officers, we did a thing called rappeling,  
10 traversing. Vertical Rope Rescue gets you used to  
11 depending on your equipment, and you could be hanging on a  
12 helicopter or rappeling out of a helicopter, off the side  
13 of a building.

14 You could use the ladder to build steeples to  
15 access second, third floors of apartment buildings, so it  
16 was a skill building, and you learned how to depend upon  
17 your equipment and your teammates.

18 Q. Certificate of Completion. This was a -- if I  
19 can read it correctly -- it was a disturbance and control  
20 seminar with the Central Florida Criminal Justice Regional  
21 Training Center in Orlando?

22 A. Yes, sir. One of the skills that I acquired or  
23 one of the responsibilities that I acquired during this  
24 period was how to mobilize the agency expeditiously in the  
25 event of a need for crowd control. I think the title is

1 disturbance or riot or crowd control.

2 So I visited several agencies and developed what  
3 we call a Field Force Concept. That was a mobilization  
4 and equipment plan for expediency in the department in  
5 case something happened. And what came out of that is I  
6 developed new SOP policies for the department and new  
7 mobilization plan that the department adopted.

8 Q. Certificate of Appointment, that is to certify  
9 this is a certificate that's given in recognition of  
10 successfully meeting requirements established by the  
11 National Rifle Association for Curtis J. Reeves, Jr.

12 What was this about?

13 A. This was a -- again, a credential. It was a  
14 course that -- that gave you all the safety requirements,  
15 as well as the functional requirements, to a training  
16 program and firearms utilization.

17 So it developed -- it developed your skills and  
18 a training program that teaches you the whys and the  
19 wherefores and the impacts of weaponry and that sort of  
20 thing.

21 Q. Federal Bureau of Investigation presents this  
22 certificate to Curtis J. Reeves. That's a management  
23 seminar.

24 What was that about?

25 A. I went to the FBI academy a couple of different

1 times for a couple of different programs. That seems to  
2 indicate that the FBI academy -- that was probably a --  
3 pretty much what it says. A management seminar teaches  
4 you how to manage folks, how to manage in the law  
5 enforcement environment, how to manage legally, what your  
6 legal responsibilities are.

7 In the event that you respond to a situation  
8 somewhere in your community, you need to know what the  
9 impactors are for the decisions that you make.

10 Q. State of Florida Department of Law Enforcement.  
11 This was in, I guess, a program dealing with the executive  
12 and organizational changes.

13 Tell me what that was about.

14 A. The -- I taught for the Executive Institute  
15 courses, which was the FDLE. I presented several programs  
16 around the State for them. As classes became available  
17 that was of interest to me or of interest to my agency,  
18 then I would try to get involved in those and find out  
19 what it was all about so that I could use that in the  
20 training seminars that I did for them.

21 Q. That was 1983.

22 FDLE, Florida Department of Law Enforcement  
23 Organized Crime Institute, this was a special police focus  
24 on criminal and extremist terror, National Conference For  
25 Violence -- or On Violence, I should say, not for

1 violence.

2 A. I believe I was a speaker at that conference, if  
3 I remember correctly. In any event, it dealt with -- that  
4 was the terrorism of weapons of mass destruction, the  
5 things that were kind of in the forefront of our country  
6 during that time period. And if I'm not mistaken, I was  
7 part of that program there, but I also attended it when I  
8 (inaudible.)

9 Q. Okay. Models for Management seminar?

10 A. This was a training program for managers during  
11 that time frame. There were several that were around, and  
12 the department picked Models for Management as a program  
13 to put the management team, I think -- I think sergeants  
14 and/or maybe lieutenants went to that seminar, managing  
15 people, skills that you need to manage -- effectively  
16 manage people.

17 Q. Okay. Another one on the Commissions on  
18 Criminal Justice Training. This is a career development  
19 certificate, executive development-based law enforcement  
20 officer.

21 A. This was probably a very basic program, and it  
22 might have been a part of that incentive program I  
23 mentioned earlier.

24 Q. Financial incentive?

25 A. Yes, sir. I think so.

1           Q.     Department of The Army.  Again, this is an  
2     Advanced Marksmanship and Counter Sniper and Preparatory  
3     Course?

4           A.     Yes.  This was held at the MacDill Air Force  
5     Base.  It was a -- I think it was one or two days a week  
6     for probably about three or four months.

7                     They had special -- specially trained -- some of  
8     these guys were ex-military snipers that had been in  
9     Vietnam, and they came down and shared their experiences  
10    and we also learned how to shoot.

11                    Again, it was a long-range training program for  
12    long ranges, and we learned how to shoot smaller targets  
13    closer which simulated long ranges.  So it was a very  
14    concentrated -- it was a national match shooting course is  
15    what it was.

16                    A lot of people don't know what that is, but  
17    every year they have national matches in this country at  
18    Camp Perry, and that was the program that developed the  
19    marksmanship for that program.

20           Q.     State of Florida Department of Law Enforcement  
21     Organized Crime Institute, Ethnic Crime Seminar?

22           A.     Yes, sir.  One of the things that we always try  
23    to do as an agency is to stay as diversified as we can.  
24    So when programs came up that offered a different view of  
25    the same subject, I always jumped at that.



1           Q.    Florida Institute for Law Enforcement, this  
2   is -- it looks like an executive development type of  
3   course, Psychology of Management.

4           A.    Yes, sir.  That was an executive development  
5   program that enhances your -- your ability as a manager of  
6   people.

7                   In law enforcement, that's a pretty -- you know,  
8   you think about managing people in private industry.  It  
9   may not be quite as complicated as managing officers in  
10   law enforcement.  You have to be aware of the legal  
11   aspects and vicarious liability aspects and all of that  
12   kind of stuff.  So these programs were designed to keep  
13   that in the forefront in your mind.

14          Q.    Florida Institute for Law Enforcement again,  
15   another executive development program, Philosophy of  
16   Management --

17          A.    Yes.

18          Q.    -- seminar?

19          A.    Pretty much the same thing.

20                   MR. ESCOBAR:  Can you move it down just a tiny  
21   bit there?  There you go.

22   BY MR. ESCOBAR:

23          Q.    Criminal Justice Standards and Training  
24   Commission, again.  This was an advanced criminal  
25   investigation course which was taught by, I guess, the

1 Florida Department of Law Enforcement?

2 A. Yes, sir. I taught the criminal investigation  
3 course at the academy for a number of years. One of the  
4 things that I tried to do was just to stay up to date on  
5 the latest technology, and that's the class that would  
6 have done it for me.

7 Q. Okay. Federal Bureau of Investigation Executive  
8 Development Seminar, again, 1987.

9 A. Yeah, that's a perspective from a different  
10 agency on the -- on the models. I think that was taught  
11 at a -- it was at a hotel there in Tampa Bay, but it was a  
12 different perspective on the same --

13 Q. Management --

14 A. -- same management program.

15 Q. -- of people?

16 A. Yes, sir, of managing people.

17 Q. Okay. This is a Certificate of Appreciation  
18 that was presented by the City of Tampa for 20 years of  
19 valuable service to your community?

20 A. Yes, sir, a certificate by virtue of presence.

21 Q. Okay. State of Florida Department of Criminal  
22 Justice Standards and Training Instructor Certification.  
23 I think this was in 1988, if my eyes are correct.

24 A. Yes, sir. You -- periodically, you had to -- in  
25 order to keep recertifications, you had to take classes

1     that would give you the opportunities to be recertified so  
2     you could keep your instructor certificate. So that would  
3     be one of the classes that you would take.

4           Q.     Now, in addition to all of these certificates  
5     that you were getting, were you in constant communication  
6     with tactical units throughout the United States?

7           A.     Yes, sir. Just about any time that any unit  
8     around the country that had any kind of activity that we  
9     found out about -- sometimes we would find out about the  
10    community, sometimes we'd find out through the law  
11    enforcement network, sometimes my contacts at the FBI  
12    would let us know.

13                   One of the things that I always tried to do was  
14    contact that agency and find out what the issue was, find  
15    out how they handled it, find out what kind of equipment  
16    they used, what they did right, what they did wrong so  
17    that we didn't make the same mistakes if we were  
18    confronted with the same situation.

19           Q.     Next. So those are resources that were  
20    available to you that you all would share?

21           A.     Yes, sir. I started -- I built some resources  
22    early on when I started developing a team in 1972, and I  
23    carried those -- most of those people through the end of  
24    my career.

25           Q.     This is another certificate dealing with police

1 community relations and leadership retreat.

2 A. The city had programs at that time where we had  
3 interactions with -- law enforcement management had  
4 interaction with the minority community. Some of them  
5 were mandatory, some of them you signed up for. This just  
6 happened to be one of the ones that I went to.

7 Q. Okay.

8 Another one dealing with police community  
9 relations and leadership in that particular aspect of law  
10 enforcement?

11 A. Yes, sir. I think -- during that time period, I  
12 was kind of assigned to one of the districts, I think, and  
13 when these kind of -- type of things came up, he sent me  
14 out as the representative from the Police Department, so  
15 they tried to keep me updated on -- on how to make those  
16 presentations and -- you know, because everybody -- the  
17 interaction with a lot of the community was sometimes  
18 adversarial. My job was to go out there and turn that  
19 around.

20 Q. This was another managing incidents course, and  
21 not only managing incidents, but this was a managing major  
22 incidents course; is that correct?

23 A. Yes, sir, it was. I was on a couple of  
24 different committees.

25 One of the things that we found was that,

1 oftentimes, smaller jurisdictions didn't have the  
2 capabilities to respond to the type of emergencies they  
3 might be faced with. So through the committee we thought  
4 it was a good idea to have some classrooms on how to  
5 interact with agencies that you don't necessarily work  
6 with on a regular basis.

7 Sometimes you can't communicate with them on  
8 your radio systems and nobody had really had to do that  
9 successfully up to that point, so this program kind of  
10 helped get everybody on the same page, so that if they did  
11 have a emergency and they were able to work together, they  
12 could do so effectively.

13 Q. Delray Beach Police Department Street Survival,  
14 1989, the Tactical Edge Seminar?

15 A. Yes, sir. That was -- that was a program that  
16 kind of elaborates on the things that we've been talking  
17 about, the officer survival.

18 The emphasis on that particular one there was  
19 how to go home at the end of your shift, how to be  
20 effective, how to anticipate danger, and how to -- one of  
21 the things that we always had con -- not a conflict with,  
22 but one of the things that was always an issue was as the  
23 violence escalates, an officer only has so many tools on  
24 his belt, so he has to be able to respond instantaneously  
25 with the right tool under the right circumstances, and, of

1 course, if you don't do it, you'll be criticized.

2 So that program was designed in part to dole out  
3 to the participants some training ideas that would help  
4 out in that -- dealing with those issues.

5 Q. Another street survival, 1989. This just  
6 actually happened -- it looks like it was conducted by  
7 Caliber Press in 1980, I think.

8 A. I think it tagged onto that previous one. And I  
9 think it was -- the Win Seminar, that was a heavy emphasis  
10 on training an officer on how to anticipate danger, react  
11 accordingly, and to go home at the end of the shift. So  
12 it was a program that you could share with your officers  
13 that may increase their survivability rate.

14 Q. International Association of Chiefs of Police,  
15 SWAT Supervisors Tactics and Management, 1989.

16 A. That was -- several other agencies around the  
17 State had been developing their SWAT teams and were coming  
18 to us for some leadership and direction, and I was  
19 doing -- I was trying to help them out.

20 The IACP kind of picked up on the fact that it  
21 was becoming a little bit of a popular thing around there,  
22 so they put together a conference over there for most of  
23 the agencies actually in the southeastern United States  
24 but mostly for Florida, and it was designed to impart the  
25 tactics on how to manage a SWAT team. I don't remember

1 specifically, but I may have been a speaker at that  
2 conference.

3 Q. Another Certificate of Appreciation, 25 years --  
4 we can move to the next one --

5 A. Yes.

6 Q. -- Department of Law Enforcement. This was a  
7 mutual aid issue concerning your SWAT team; is that  
8 correct?

9 A. Yes, sir. That was the executive institute, I  
10 think, with the FDLE. That was kind of what I  
11 mentioned -- I alluded to earlier on how agencies can work  
12 together effectively to combat a common problem.

13 The Fire Department had been doing that for a  
14 couple of years. Law enforcement agencies were not quite  
15 as successful, so it was kind of a statewide effort to get  
16 everybody on the same page so they knew what the  
17 expectations were.

18 Q. This is, The Tactical Response Team presents to  
19 Captain C.J. Reeves in Recognition of 15 years of  
20 Tenacity -- you can read that for me --

21 A. Guile and devotion to our calling. That was  
22 presented to me after 15 years when I was transferred over  
23 and became commander of the bomb squad.

24 Q. This is a certificate you received in 1991  
25 titled, "Diversity"?

1           A.    Yes, sir. That was -- that was how to -- how to  
2 function effectively in your communities. That's what  
3 you're learning how to do, and you're hoping to train your  
4 officers to do that.

5           Q.    1991, another one dealing with, I guess,  
6 "Demonstrations In The 1990s, A Law Enforcement Response?

7           A.    Yes, sir. That's, again, the civil disorder  
8 that I alluded to earlier, one of the earlier ones that I  
9 went to, how to organize and equip your officers to  
10 respond to an emergency with a large group of officers.  
11 That was the field force concept that I put into effect in  
12 Tampa.

13          Q.    Okay. This is a -- this is just a Certificate  
14 of Appreciation?

15          A.    Yes. This -- like I mentioned to you earlier,  
16 oftentimes I was called upon to go out into the community,  
17 either by virtue of my assignment or by virtue of my  
18 personality, I don't know. But I was oftentimes called  
19 out to go into the community to address these meetings and  
20 to address their concerns about the crime in the  
21 community, that sort of thing.

22          Q.    Okay. This is the Fraternal Order of Police,  
23 your Retirement Certificate that took place in 1993?

24          A.    Yes, sir. That's the one that I've been looking  
25 forward to for a long time.



1 Q. Okay. I think we've got one more.

2 A. Oh, okay.

3 Q. This was a plaque that was given to you for over  
4 27 years of dedicated service between 1966 and 1993 by the  
5 City of Tampa to Captain Curtis J. Reeves.

6 A. Yes, sir. Thank you.

7 MR. ESCOBAR: This may be a good time to take a  
8 break.

9 THE COURT: Yes. Let's take 15 minutes.

10 (Recess taken.)

11 THE COURT: You may continue, Mr. Escobar.

12 BY MR. ESCOBAR:

13 Q. Mr. Reeves, when did you start your employment  
14 with Busch Gardens?

15 A. That would have been October of 1993.

16 Q. And did you -- likewise, when you were with  
17 Busch Gardens, did you continue taking seminars in order  
18 to improve your knowledge and your ability of security  
19 issues now at amusement parks?

20 A. Yes, sir, I did.

21 Q. Okay. And what are we -- what are we seeing  
22 here, this Certified Protection Professional letter from  
23 1995?

24 A. When I got there in 1993, there were two  
25 professional organizations, as I mentioned earlier,

1 American Society for Industrial Security and American  
2 Society for Amusement Park Safety and Security. Both of  
3 them are national organizations.

4 And this is a letter -- in 1995, I became a  
5 certified protection professional, which is a program  
6 through the American Society for Industrial Security.  
7 It's their premier program for law enforcement -- or for  
8 security professionals.

9 It's one of -- it's a study -- it's about a  
10 five-or six-month study, an all-day test and that sort of  
11 thing. At that time, there was probably only about six or  
12 seven thousand CPPs, which is certified protection  
13 professionals, in the country.

14 So that was one of the things that I did to get  
15 myself oriented into -- out of the law enforcement stuff  
16 and into the security arena.

17 Q. This is a Busch Entertainment Corporation  
18 Certificate.

19 What is this about?

20 A. Applied management. Again, it's a management  
21 class designed to enhance your abilities as a manager.

22 Q. With people?

23 A. How to deal with people, not just the employees,  
24 but also the guests that are coming in every day.

25 Q. American Society for Amusement Park Security and

1 Safety, what is this?

2 A. That's one of the organizations that I just  
3 mentioned. It's a membership certificate. I think that  
4 is when I joined it, in '94, that's when I found out about  
5 it. And I was a lecturer at annual conferences for  
6 probably all the way up until about 2003. I was the  
7 president for 2003 and 2004.

8 Q. American Society for Industrial Security, again,  
9 another Certificate of Membership?

10 A. That's a Certificate of Membership. And in  
11 order to be a member of that group, you had to have some  
12 management role in the security field.

13 And that organization also provided training,  
14 and I think they call them CEUs, which were credits, which  
15 each and every year you had to update yourself by taking a  
16 certain amount of training courses.

17 Q. This next one is, "The Busch Entertainment  
18 Corporation certifies that Curtis Reeves has successfully  
19 completed communication skills, 1995."

20 A. Right. And that's along the same vein as  
21 before. It's designed for -- so that you can -- it's to  
22 give you the public relations approach to dealing with,  
23 perhaps -- I guess you could say a little adversity in the  
24 segments of community coming in. But when you say that,  
25 it's really not -- they're mostly families, very little

1 problems.

2 But it's designed to make you a more effective  
3 person to be able to deal with issues that they bring.  
4 They're a microcosm of society, so it's only natural that  
5 a few things come along with them that need to be  
6 addressed by security.

7 Q. Okay. What is this certification? This is  
8 Certified Protection Professional?

9 A. Yes, sir. This is that certification that I  
10 mentioned earlier as a certified protection professional.  
11 And each -- every year you had to have credits in order to  
12 maintain that certification, so you're recertified every  
13 two years.

14 Q. Is that a similar certificate?

15 A. Yes, sir, it is.

16 Q. Just in 1995?

17 A. Yes, sir.

18 Q. Situational Leadership Certificate that the  
19 Busch Corporation gave you. What is this?

20 A. Well, I think it's -- if I remember correctly,  
21 it's how to lead when you have some kind of an issue that  
22 occurs in the park that attracts attention, either from  
23 the media or from the guests themselves, how to deal with  
24 that kind of problem, how to manage the employees, how to  
25 minimize the impact that it has on the guests.

1           Q.    Okay.  Another training course for fundamental  
2 concepts of security techniques?

3           A.    Yes, sir.  When I got to Busch, Busch  
4 Entertainment Corporation was nine parks, Sea World, Busch  
5 Gardens.  They were kind of all over the country.  They  
6 really didn't have any cohesion, as far as coordinating  
7 with each other.  So probably the year after I got there,  
8 I was kind of assigned as the chairman.

9                    So we started having conferences and putting on  
10 security seminars.  And I also worked on a quantitative  
11 evaluation procedure that could be used between each of  
12 the parks to kind of standardize the procedures that they  
13 had, whether it be dealing with people or dealing with our  
14 cash control.

15                   Millions of dollars flow through these parks and  
16 we standardized how to effectively handle that money and  
17 keep it as safe as we can.

18          Q.    Okay.

19          A.    I think I probably put that seminar together.

20          Q.    American Society for Industrial Security.  This  
21 was another course in dealing with business security and  
22 protection and prevention?

23          A.    Yes, sir.  They had guest speakers from all over  
24 the country come in, and this was the latest -- on the  
25 latest techniques to deal with some of the aspects that I

1 already mentioned.

2 Q. Okay. Again, from the American Society of  
3 Industrial Security?

4 A. Yes, sir. That's a recertification of a  
5 certified protection professional designation.

6 Q. And again, you had to take courses for each  
7 certification?

8 A. Yes, sir. Either you had to be a participant or  
9 a speaker in a certain -- you got credits for so many  
10 different classes and so many hours of instruction, and  
11 that's what it took to maintain those certifications.

12 Q. Okay. Another professional certification board  
13 award; is that correct?

14 A. Yes, sir. It's a -- it's another  
15 recertification of the certified protection professional.

16 Q. And another American Society for Industrial  
17 Security; is that correct? This was a "Security  
18 Challenges for the New Millennium."

19 A. Yes, sir. I started putting together two-day  
20 security seminars on behalf of my chapter in Tampa, and I  
21 got the Criminology Department of USF to help sponsor it.  
22 So each year for about three or four years, I had a  
23 two-day security conference that I put on at USF for  
24 security professionals from all over the country.

25 And that's one of the classes that -- I don't --

1 I don't think -- I was a speaker at a couple of them. I  
2 don't think I was at that one. I think I was just a  
3 participant.

4 Q. And what is this?

5 A. I was chairman of the Tampa Chapter of American  
6 Society for Industrial Security in 1999. That's -- that's  
7 when I was a chairman.

8 Q. Okay. And what is this American Society for  
9 Industrial Security Honorable Mention Award?

10 A. Those are -- in the security professional arena,  
11 there's documentation and then there's activities that  
12 each chapter performs. You're in a monthly or an annual  
13 magazine as to what's available to you, what you've done.  
14 This is an award for some of the programs that we put on  
15 that year that I was the chairman.

16 Q. Okay. This is the Charles Knight Award. What  
17 was that for? In outstanding recognition, I guess, for  
18 your efforts on behalf of the chapter during the year  
19 2000?

20 A. Yes, sir. That was -- actually, that was for  
21 1999. The award was given in 2000. That's when I was the  
22 chairman. We had several outreach programs that we -- in  
23 conjunction with some of the programs that we put on for  
24 security professionals all over the country, and that  
25 was -- I think that came from the national, I think -- the

1 national group in conjunction with the security classes  
2 that I put on at USF each year.

3 Q. Okay. What is the "Curtis Reeves 2000 Day of  
4 Caring"?

5 A. This is a -- was a United Way program that I was  
6 involved in where we performed some community service into  
7 the -- in the community.

8 Q. Okay.

9 A. I think I was -- I might have been the  
10 coordinator for that year for Busch Gardens.

11 Q. Tampa Area Safety Council put on a seminar for  
12 violence in the workplace, Are You Prepared? I believe  
13 that was in 1994, if I'm not mistaken?

14 A. Workplace violence was a hot topic during that  
15 time frame, so one of the things that I did on the  
16 security conferences that we put on at USF was included  
17 some workplace violence, as well as some -- at that time,  
18 we were talking about weapons of mass destruction and that  
19 sort of stuff.

20 That was one of the programs that they put on  
21 that gave me some information on the seminar that I was  
22 going to put on.

23 Q. Okay. Now, this was a Certificate of Merit for  
24 Handling People with Diplomacy and Tact. That was given  
25 to you in the year 2001?



1           A.    Yes, sir.  If my memory serves me correct, that  
2   was a program where it was a role play where you were  
3   given -- in front of the class you were given a problem.  
4   You kind of address their problem and you tried to use  
5   tact and diplomacy in handling issues with individuals or  
6   groups.

7                   MR. ESCOBAR:  Next.

8   BY MR. ESCOBAR:

9           Q.    Another Security in the New Millennium course.  
10  I guess this was a two-day course in 2001; is that  
11  correct?  The same as a --

12          A.    That's another one of the classes that was at  
13  USF.  I think I was -- I was not a speaker at that one, I  
14  don't think.

15          Q.    Okay.

16          A.    I was a fill-in guy.  If one of the -- I had  
17  instructors come from all over the country.  Most of them  
18  were from federal law enforcement agencies, whether it was  
19  ATF or bomb or Federal Attorney's Office, that kind of  
20  stuff here.  Sometimes they'd miss a plane and they'd be  
21  late, so I was the fill-in guy.

22          Q.    This was a visitor safety and security summit  
23  that was held in 2002 in Orlando that was -- you completed  
24  that as well?

25          A.    Yes, that was sponsored by the Orange County

1 Sheriff's Office. I completed that, yes.

2 Q. ASIS Florida West Coast Chapter of Domestic  
3 Violence, Stalking in the Workplace, a virtual seminar?

4 A. Each year we had a -- we had a conference where  
5 we recognized local law enforcement, and so we -- that was  
6 one of the things that I had started there and did for a  
7 couple years.

8 And if I remember correctly on this particular  
9 one here, what we did is we had the officers that we were  
10 going to recognize show up, and then area security  
11 professionals from other chapters, and we had that program  
12 at that seminar.

13 Q. Okay. I think we've got three more, Mr. Reeves.

14 The American Society for Amusement Parks  
15 Certificate of Membership that you received in 2004; is  
16 that correct?

17 A. Yes, sir. That's -- that's when I was the  
18 president of the organization and I gave myself a  
19 certificate.

20 Q. Okay. This is another ASIS certificate, and it  
21 looks like it was an ASIS Homeland Security Conference.  
22 And were you the speaker or one of the speakers in this  
23 conference?

24 A. Yes, sir, I was.

25 Q. Okay. And what is this?

1           A.    I think that's the certificate that when I first  
2 was -- when I first passed the test and was a certified  
3 professional, I think that's when -- I think that's the  
4 certificate itself.

5           Q.    Now, between your studies, both at the Tampa  
6 Police Department, as well as in security with Busch, did  
7 you learn certain survival techniques as well as cues to  
8 recognize escalating patterns of violence?

9           A.    I think that came primarily from my law  
10 enforcement exposure that I had learned those patterns  
11 of -- that I encountered. Not only did I learn them, but  
12 I also instructed on them.

13          Q.    Did you learn and instruct on the issues of  
14 recognizing your environment in an aggressive encounter by  
15 someone else?

16          A.    That was a part of almost every class, yes, sir.

17          Q.    And why was your environment important in your  
18 assessment of danger?

19          A.    Well, there's a variety of reasons that your  
20 environment could be a problem. It could be hazards in  
21 your environment to you if you're involved in a  
22 confrontation. It could be other people in that  
23 environment.

24                And then there's environments where you would  
25 not expect to have any kind of an encounter, and then

1     there's the other environment that you're constantly on  
2     guard because there's always the potential, depending on  
3     where you're at.

4           Q.     And if -- and if something happens in an  
5     environment that you don't expect that to happen, how do  
6     you pick up on that cue? What's the value of that cue?

7           A.     Well, you have to figure there's -- there's a  
8     mirage of things that you have to look at in addition to  
9     the environment. You have to look at who's present, what  
10    you're doing there, what they're doing there, what's going  
11    on in that environment.

12                   Whether it's a bar where there's a lot of  
13    grabbing that's going on, or if it's is a very docile  
14    environment, a church parking lot or something like that.  
15    So being aware of your surroundings is the key to being  
16    prepared for that kind of activity.

17           Q.     And evaluating that particular violence within  
18    that environment?

19           A.     Yes, sir.

20           Q.     What are the lighting conditions of -- have you  
21    been trained in your career as a law enforcement officer  
22    on taking into consideration the lighting conditions in  
23    your environment?

24           A.     Well, almost everything that we do -- and it's a  
25    statistic that's been around for years. Now, I've been

1     retired for 23, so I'm assuming that it's still there, but  
2     for 20, 30 years, the vast percentage of police shootings  
3     occurred in low-light situations.

4             Q.     And so what does low-light situations do for  
5     individuals that are being confronted with a violent  
6     situation?

7             A.     Well, it affects your perceptions and oftentimes  
8     it may delay your -- it may delay your anticipation of  
9     what's going to happen, or it could increase your lag time  
10    in responding to what's happening.

11            Q.     What about noise?

12            A.     Noise is always a distracter, particularly loud  
13    noise.

14            Q.     The issue of distance between yourself and an  
15    aggressor, is that an important issue?

16            A.     Absolutely.

17            Q.     Why is that an important issue?

18            A.     It's the proximity between you and any  
19    adversary, whether you're a law enforcement officer or  
20    not. Proximity is a key ingredient also in whether or not  
21    it's an imminent attack.

22            Q.     And the less distance prohibits you from  
23    properly responding, possibly?

24            A.     Well, the closer distance puts you in a closer  
25    proximity to the danger. It has a potential to slow down

1 your lag time or your response to the event.

2 Q. And so as a law enforcement officer in a  
3 situation that's an aggressive situation, are you trying  
4 to reduce your distance between you and the aggressor or  
5 increase your distance?

6 A. The rule of thumb there is to increase your  
7 distance, unless you are in control of the situation, as  
8 in if you're trying to make an arrest or something of that  
9 nature. Normally, you would increase the distance.

10 Q. Mr. Reeves, I'm going to direct your attention,  
11 if I can, to January 13, 2014, and I'm going to ask you  
12 what you were doing midday on that day.

13 No, let's go to the morning. Let's start that  
14 morning.

15 Tell me what you were doing that morning on  
16 January 13th of 2014.

17 A. I think we were -- normal things. My wife and I  
18 were home and probably had breakfast. I had recently  
19 returned from a trip, actually, the day before, and I was  
20 probably going through my suitcases and organizing my  
21 equipment, and she was probably doing normal household  
22 stuff.

23 Q. Did you, at some point in time, decide to go to  
24 the Cobb Theater to watch the Lone Survivor?

25 A. Yes, sir, I did.

1 Q. And how did that agreement come about?

2 A My son and I was on a trip together before and  
3 had been talking about it. I think I had read the book  
4 and he had as well, and I asked my wife that since he and  
5 I had been talking about it, if she would be interested in  
6 going. She agreed, and we looked up the time for the  
7 movie.

8 Q. And did you go to the matinee movie?

9 A. Yes, sir, we did.

10 Q. And do you know what time, approximately, you  
11 arrived there at the matinee movie?

12 A. I think right around 1:00.

13 Q. Now, before we get into the actual movie, I'm  
14 going to ask you a couple questions. It's AP09.

15 I'm going to show you what's been marked as  
16 AP09, and ask you if you know what the contents of that  
17 particular exhibit is?

18 A. Yes, sir, I do.

19 Q. What is that?

20 A. That's my retired ID card from the City of Tampa  
21 Police Department.

22 Q. And where do you normally keep that?

23 A. In my billfold or badge case. I carry a badge  
24 case, so it would normally be in my badge case, which  
25 would be in my back pocket.

1           MR. ESCOBAR: Your Honor, this has been  
2 stipulated as an exhibit of evidence.

3           THE COURT: Okay.

4           THE CLERK: 44.

5           THE COURT: Okay. That will be admitted as  
6 Defense 44.

7 BY MR. ESCOBAR:

8           Q. I'm going to show you what's been marked as  
9 AP11, AP16 and AP05, and ask you if you recognize each of  
10 those. And please keep them in their same envelope if you  
11 can.

12                  What is AP05?

13           A. That's my badge case with my retirement badge in  
14 it.

15           Q. Okay. What is AP11?

16           A. That is the -- my carrying concealed firearm  
17 license.

18           Q. What is your -- what is AP10?

19           A. That's the certification for the 218. I guess  
20 you could call it the federal license.

21           Q. Federal law enforcement qualifications card?

22           A. Yes, sir.

23           Q. Let's talk a little bit about your carrying  
24 conceal firearms card first.

25                  You had a carrying concealed firearms license or



1 certificate to be able to carry a concealed firearm?

2 A. Well, I actually had two. I had the federal one  
3 and then I had the state.

4 Q. And the state would be the carrying concealed  
5 firearm that we just recently talked about as far as --

6 A. Yes.

7 Q. -- the numerical number that it's been  
8 introduced as?

9 MR. ESCOBAR: He has stipulated to all of them.

10 THE COURT: All right. What's come in?

11 MR. ESCOBAR: Just one. Those two have not come  
12 in.

13 THE COURT: If she's holding them, they're in.

14 THE CLERK: But we haven't said that they're in.  
15 Are they coming in?

16 THE COURT: Yeah, they'll be admitted.

17 MR. MARTIN: By stipulation, they're all coming  
18 in.

19 MR. ESCOBAR: You said to bring them in --

20 THE COURT: Yeah, but --

21 MR. MARTIN: Let's just move along.

22 THE COURT: -- we've got to make sure we get  
23 them identified as such. 44 was the --

24 THE CLERK: Retired ID card.

25 THE COURT: -- retired ID card. 45 is what?

1 THE CLERK: That's the wallet, and 46 will be  
2 the concealed weapon license.

3 MR. ESCOBAR: And we have one more.

4 THE CLERK: That'll be 47.

5 MR. ESCOBAR: That's the Florida Law Enforcement  
6 Certificate.

7 THE COURT: This is --

8 MR. ESCOBAR: The 218 is the Safety Act.

9 BY MR. ESCOBAR:

10 Q. Now, Mr. Reeves, the State of Florida Criminal  
11 Justice Standards and Training Card, which is your  
12 firearms proficiency verification card that's signed by  
13 David P. Bryant, is this the same certificate card that  
14 you are required to carry pursuant to the Law Enforcement  
15 Officer Safety Act?

16 A. The federal act, yes, sir.

17 Q. And are you familiar with the legislative intent  
18 concerning the enactment of that particular law that  
19 allows retired law enforcement officers and encourages law  
20 enforcement officers to carry such a certificate and  
21 firearm?

22 A. Yes, sir, I am.

23 Q. And does that particular act, the congressional  
24 committee meetings, show an intent to have law enforcement  
25 officers that are retired continue to assist in the

1 protection of the community?

2 A. Yes, sir, it does.

3 Q. And is that the reason that you had that  
4 particular certification?

5 A. Yes, sir, it is.

6 Q. And that would be, sir, Defendant's Exhibit  
7 Number 47.

8 A Okay.

9 Q And did you have that particular card with you  
10 on January 13th of 2014?

11 A. Yes, sir, I did.

12 Q. And did you have that particular card with you  
13 in the Defense exhibit that's been introduced, Exhibit  
14 Number 45? You can pull that out.

15 A. Yes, sir. This is my badge case and it has a  
16 place for it. I kept all that -- all that information  
17 that you had was inside this badge case.

18 Q Your Carrying Concealed Firearm Certificate?

19 A. Yes, sir.

20 Q. Your Safety Act Certification?

21 A. Yes, sir.

22 Q. As well as your badge with wallet?

23 A. Yes, sir, and the ID card that goes with the  
24 badge.

25 Q. Okay. And that's your retirement ID card?

1           A.    Yes, sir, it is.

2           Q.    It shows you're a retired law enforcement  
3 officer?

4           A.    A retired police captain.

5           Q.    And does this particular badge likewise read  
6 "retired police captain"?

7           A.    Yes, sir, it does.

8           Q.    I think we -- with Defense Exhibit Number 46,  
9 we've already spoken about your carrying concealed weapon  
10 license; is that correct?

11          A.    Yes, sir. Issued by the State of Florida.

12          Q.    And those were all current?

13          A.    Yes, sir.

14          Q.    So did you have those on your person on January  
15 the 13th of 2014?

16          A.    Yes, sir, I did.

17          Q.    And were you also armed when you went to the  
18 movie theater on January the 13th of 2014?

19          A.    Yes, sir, I was.

20          Q.    And do you normally go about town armed?

21          A.    I have had the ability to do that for the last  
22 48 years, so the answer to that would be a lot of the  
23 time, but not every day.

24          Q.    Okay. So you and your wife go to the matinee  
25 theater to see Lone Survivor that day?

1           A.    Yes, sir.

2           Q.    You get there about -- close to -- somewhere  
3 around before the movie started?

4           A.    Around 1:00, yes, sir, I think.

5           Q.    Around 1:00.   Okay.

6                   And what do you do when you go in?

7           A.    Well, we buy our tickets, we go inside.   We  
8 stand around the concession area for a little while, and  
9 then we were going to meet our son.   He was going to meet  
10 us there.   He -- he was running a little bit late, so we  
11 bought a bag of popcorn and a cold drink and went inside  
12 the theater.

13          Q.    And where exactly did you sit in that theater?

14          A.    Well, when we came in, there was a lot of folks  
15 there.   Since we -- there was three of us, everybody in  
16 the matinees like to put a couple seats between them and  
17 other people, they kind of spread out.

18                   So we found five seats together in the very last  
19 row at the very top of the stairs, about in the middle of  
20 the theater.

21          Q.    At the time that you went in, what was showing  
22 on the theater screen?

23          A.    They had some commercials, advertisements, that  
24 sort of stuff, you know.

25          Q.    Did there come a point in time where you were

1     seated there and an announcement came on the theater  
2     screen concerning cell phones?

3           A.     I think there's a -- I think it's, like, for the  
4     snack bar it comes on. I think the theater -- the lights  
5     go down -- and I may be off a little bit on exactly when  
6     the lights go down, but there's a snack bar feature and  
7     then following that is the -- I guess it's a courtesy  
8     announcement to turn your cell phones off. Yes, sir.

9           Q.     And had your cell phone been turned off by this  
10    time?

11          A.     Yes, sir.

12          Q.     And after this announcement to turn off your  
13    cell phones, what -- what happens?

14          A.     As the previews came on, I noticed a gentleman  
15    that was sitting in front of my wife had his cell phone  
16    out and it was kind of shining in my face.

17          Q.     The light from the cell phone was shining in  
18    your face?

19          A.     Yes, sir.

20          Q.     Were the previews on at this point in time?

21          A.     I believe there were -- yeah, it was the  
22    previews, yes.

23          Q.     And were you trying to watch the previews?

24          A.     Yes, sir.

25          Q.     And were the previews of interest to you?

1           A.    We always like to see what the previews are so  
2 we know if we want to go see the movie or not.  So yeah,  
3 we always watch that.

4           Q.    Do you and your wife frequent the movies often?

5           A.    When we want to go to relax, yeah.  Whenever  
6 we -- if there's something showing that we want to see,  
7 yes.

8           Q.    And so as you were watching the previews and the  
9 light was shining on your face, tell the Court what you  
10 did.

11          A.    After, I don't know, 15, 20, 30 seconds, I had  
12 leaned over to the gentleman and I said -- and I was -- I  
13 was -- my voice was low.  I said, "Sir, can I get you to  
14 put your cell phone away?"

15          Q.    And was there a response to that?

16          A.    The response was "F-off" or "Get the F out of my  
17 face."

18          Q.    Did you respond to that -- that statement by  
19 this individual?

20          A.    I got away from him.  Well, I didn't say  
21 anything.  No, sir.

22          Q.    That was the extent of your initial --

23          A.    That was -- that was it.  No, sir.  I got back  
24 in my seat.

25          Q.    You got back in your seat.

1                   Now, what did you do?

2           A.     Well, I watched his wife reach over. I  
3     assumed -- well, I now know that it was his wife. She  
4     reached over and it looked like she was trying to talk to  
5     him, and so I just kind of stayed back and stayed out of  
6     the way to see what would happen.

7           Q.     Did you expect him at that point in time to, at  
8     the very least, turn off his phone?

9           A.     That would be the expectation, I guess, yeah.

10          Q.     So how long were you now seated back waiting for  
11     him to comply with the announcement that had been made by  
12     the Cobb Theater?

13          A.     Well -- well, he had seen that and then I had  
14     probably waited, I don't know, 15, 20, 30 seconds before I  
15     said anything to him because he looked like he was busy on  
16     it.

17                   So after I spoke with him, I saw him and his  
18     wife having some interaction. She looked like she was  
19     trying to talk to him. She had put her arm over on him.  
20     And then they kind of settled down and the light was there  
21     again.

22          Q.     Okay. And what did you do again?

23          A.     I was thinking that he would put it away. He'd  
24     been, you know, I -- I had requested it and so I waited  
25     probably, I don't know, maybe close to a minute, half a



1 minute, three quarters of a minute, something like that,  
2 and it was still there.

3 Q. So let's talk about this. I want to make sure  
4 that the Court is clear on the sequence.

5 Twenty, 30 seconds you're trying to watch the  
6 previews, the lights are in your face -- the light of the  
7 cell phone?

8 A. Yes, sir.

9 Q. You lean over --

10 A. Yes.

11 Q. -- and say, "Sir, could you put your phone away?  
12 The announcement came off to turn your cell phones off" --

13 A. Right.

14 MR. MARTIN: Your Honor, I'm going to object to  
15 summing up.

16 MR. ESCOBAR: I will. Let me get to -- I'm just  
17 getting the sequence.

18 MR. MARTIN: Well, the sequence, we've all  
19 heard, and we're all taking notes.

20 THE COURT: All right. Well, let's not -- yeah.  
21 We're -- I heard it. I heard it the first time.

22 MR. ESCOBAR: Okay.

23 THE COURT: We don't need everything summed up.

24 MR. ESCOBAR: Okay.

25 THE COURT: All right? And no leading.

1 BY MR. ESCOBAR:

2 Q. After you made that first request --

3 A. Yes, sir.

4 Q. -- you indicated that you were back, how long  
5 did you wait before you had any other contact with him  
6 after that first request?

7 A. I'm going to say at least -- at least a half a  
8 minute or maybe longer.

9 Q. What were you waiting for?

10 A. I -- my thought was that he would comply. His  
11 wife had -- had spoken with him. I felt like that he  
12 would ultimately comply, so I didn't push the issue. I  
13 just waited to see what was going to happen.

14 Q. So now what happens?

15 A. The cell phone is still there and so I leaned  
16 over and I -- again, I'm not belligerent, I'm quiet, I  
17 don't need to wake up the whole theater, and I -- and I  
18 tell him that you leave me no alternative other than to  
19 notify the theater management. And --

20 Q. Does he respond to that?

21 A. Almost immediately.

22 Q. What did he say?

23 A. "I don't give a F what you do."

24 Q. And so what did you do now?

25 A. Well, I sat back and I thought he would put it

1 away then, and it was still there. So I get up -- I get  
2 up to leave, and as I'm leaving my wife says, "Why don't  
3 we just move?" And I said, you know, "I'll be right  
4 back."

5 And I just -- I gave her my popcorn box that I  
6 was holding. We had split the popcorn; she had a bag and  
7 I had the bag. So I gave her my bag and I -- I walked  
8 down the aisle and went down to the manager's office.

9 Q. What was your intent, to go down to the manager?

10 A. Just to get this guy to put his phone away just  
11 so I can watch the movie or watch the previews.

12 Q. So did you go to the manager?

13 A. Yes, sir, I did.

14 Q. And was the manager busy speaking to someone  
15 else beforehand?

16 A. As I walked up to where the manager was, there  
17 was a woman -- a lady standing there talking with him, so  
18 I just waited until he had completed dealing with her.

19 Q. And after she finished speaking with the  
20 manager, did you have a conversation with the manager?

21 A. Yes, sir, I did.

22 Q. And what did -- what did you tell management?

23 A. I told him that -- I had said, "I'm kind of  
24 embarrassed to be here." I said, "I'm a -- I've got a guy  
25 that's sitting in front of me, that's sitting in front of

1 my wife that I had asked politely to turn his cell phone  
2 off, and he basically told me to F-off."

3 And so I said, "He doesn't seem to have the  
4 right attitude for me to try to talk to him again. I'd  
5 appreciate it if you'd -- if you'd help me out here."

6 Q. Okay. And then where do you go?

7 A. He said he'd take care of it, so I turned around  
8 and came back into the theater.

9 Q. Is that something that you would expect the  
10 patrons at Busch Gardens to do as well?

11 A. I think the plan would be to go to management.  
12 That's what we trained for 12 years, that our employees --  
13 if they had an encounter and it didn't go well the first  
14 time, that you should go find a manager. Yeah, that's --  
15 that's how we handled it.

16 Q. And so now you went back to sit down?

17 A. Yes, sir.

18 Q. And did you?

19 A. Yes, sir, I did.

20 Q. Did you go up the stairs?

21 A. I went back up the stairs, back down the row,  
22 and when I got my -- when I got to my seat, I took my bag  
23 of popcorn -- popcorn from my wife and turned around and  
24 sat down.

25 Q. Before sitting down, did you have any

1 conversations with this gentleman again?

2 A. I said one more thing to him, yes, sir.

3 Q. And what did you say?

4 A. As I'm walking down the aisle, he looked at me.  
5 I guess you could say it was a stare, perhaps. So as I  
6 went past, as -- I guess as a goodwill gesture, I told him  
7 that I saw -- I didn't see his phone at that time -- so I  
8 said, "I see you're not on your phone. Sorry I involved  
9 theater management." It may not have been those exact  
10 words, but that -- that's what it was.

11 Q. Okay, and then what did you do?

12 A. I took my popcorn bag and sat down next to my  
13 wife.

14 Q. You took your popcorn bag from your wife and sat  
15 down?

16 A. Yes, sir.

17 Q. Now what happens?

18 A. I -- I hadn't been sat down any time at all and  
19 I see that he and his wife are now interacting again, and  
20 she's got both hands on him, on his left arm this time.  
21 And he jumps up -- I say jumped up -- he stands up very  
22 quickly and he swings around and faces my wife, where my  
23 wife is sitting. He's -- he's directly in front of her.

24 He's -- he's -- just before or just as he stood  
25 up, I heard something about theater management or manager,

1 but I think it was in a conversation with his wife, not --  
2 he was very loud, so I think it was -- he was just being  
3 loud.

4 Q. So now what happened?

5 A. His motion and swinging around got my eye. He's  
6 right off to my right here, caught my eye almost  
7 immediately. When I looked up, he was coming over the  
8 seat at me across the front of where my wife was, and he  
9 had -- I saw just a snapshot of a -- of something dark in  
10 his hand.

11 Almost immediately, I saw what I perceived to be  
12 a -- a glow from a light, a screen, right in front of my  
13 face and I was hit in the face.

14 Q. What happened to you as you're hit in the face?  
15 Do you know where you were hit, do you think?

16 A. Over -- over my left eye, I think in this area.  
17 It must have hit my glasses because it knocked my  
18 glasses -- I think it knocked my glasses off at that  
19 point.

20 Q. Completely off?

21 A. Just off the side of my head. It was still --  
22 they were still in place on the right side, but this arm  
23 on the left side was down on my cheek. I didn't realize  
24 that immediately. It took a -- but in a couple of  
25 seconds.

1 Q. And why didn't you realize that immediately?

2 A. Well, I knew that -- as soon as I got hit that  
3 everything was blurry, which I have 20/20 vision with my  
4 glasses, so I didn't immediately associate the fact that I  
5 didn't have my glasses on until a little later in the  
6 event.

7 Q. Are your glasses on or are your glasses off?

8 A. On my head, but off my -- askew, I guess, on my  
9 face.

10 Q. Okay. And what are you trying to do at this point?

11 A. I was kind of dazed. I was disoriented. I was  
12 trying to get my thought processes back together as to  
13 what happened because it was so unexpected until -- I  
14 mean, it's just something that you would not expect to  
15 happen in a theater.

16 Q. Was there any verbalization whatsoever while  
17 this process was taking place?

18 A. I heard the conversation -- I heard the -- some  
19 of -- I heard his voice when he was talking with his wife.  
20 I didn't ever hear her voice. It was loud, but he was  
21 facing the other way.

22 After I got hit, then -- then he was facing me  
23 and he was very loud at that point.

24 Q. And what -- what was he saying?

25 A. A lot of sentences with the F word, "going to

1 kick your F'in' ass. I'm going to -- F you. If -- if it  
2 was any of your F'ing business, I was texting my F'ing  
3 daughter."

4 And I heard those in -- in a sequence that may  
5 not be the ones that I repeated, but I heard them all at  
6 some point during that time period.

7 Q. What happens next?

8 A. Well, my first effort at anything was to try to  
9 get out of my seat, to try to stand up.

10 Q. So how did -- how did you attempt to do that?

11 A. Well, I had a bag of popcorn in my left hand,  
12 and I normally -- because of some issues over the years, I  
13 usually push off with both hands.

14 Q. Push off where?

15 A. Push off the seat, off the hands here. One hand  
16 was occupied with the bag. I tried to stand up by just  
17 leaning forward. Then I realized that that was not a good  
18 idea.

19 Q. Why was that not a good idea?

20 A. Well, the guy that just hit me was right there.  
21 You try to get away from him, not closer to him.

22 Q. And so what did you do once you realized that  
23 trying to get up was not a good idea?

24 A. Then I got back in my seat as far as I could to  
25 increase the distance between us, and that's when I kind



1 of became aware that his wife was trying to hold onto him.

2 Q. When you say you were trying create some  
3 distance, if you could show the Court -- I think she can  
4 probably see it if she stands up -- show the Court what  
5 you were trying to do in your seat to create that  
6 distance.

7 A. Well, the seats have a little bit of spring to  
8 the back of them. So what I was trying to do was get as  
9 far back in my seat as I could. And then I remembered  
10 that I have a 5 or 6-foot wall behind me, so I was -- you  
11 know, there was not too many places to go.

12 At that point, I felt like I wanted to get him  
13 away from my wife and to further increase the distance, so  
14 I leaned as far to my left as I could in my seat, and I  
15 didn't want to bump his seat, so my right leg went out to  
16 the right side down the aisle where my wife was to try to  
17 keep me -- to keep him away from me.

18 Q. During this entire time, where was your focus?

19 A. On him.

20 Q. And -- and why was your focus on him?

21 A. Well, you -- you find yourself in that kind of  
22 an encounter, there's an old saying, "If you lose your  
23 focus, you lose your life."

24 Q. And so you weren't about to get your focus off  
25 of him?

1           A.    Not a -- not a chance.

2           Q.    What did you see happening next?

3           A.    I saw he was continuing to speak loudly, very  
4    loud.  He was -- his wife was trying to hold onto him.  
5    And as I'm in that position that I just demonstrated for  
6    you, I realized I'm trapped.

7           Q.    What do you mean by "trapped"?

8           A.    I can't get up, I can't get out, he's right in  
9    front of me, and he's trying to come over the chairs  
10   again.

11          Q.    And so what do you do?

12          A.    I think at that point -- at some point in  
13   between when I was first struck and that incident right  
14   there, I realized that I was in a life-or-death struggle,  
15   that all of a sudden he was no longer a loud mouth.  He  
16   was now a very definite threat.

17                At some point in time, because of the position  
18   that I was in, I reached for my pistol.

19          Q.    Describe to the Court during this period of time  
20   as to how he was trying to come at you again.

21          A.    He had moved a little bit over to his right,  
22   which would have been a little bit closer to, I think, his  
23   wife.  He was kind of in that little crack area, I guess  
24   you might say, in between the two seats.

25                She had -- she had been trying to hold onto him

1 and it looked like that, at that point, he suddenly either  
2 got away from her or he found a stable position, either on  
3 his seat or on the floor or something. He was suddenly  
4 right in front of me higher up off of the seat than I was,  
5 looking down at me, and he was yelling some of the same  
6 things that I'd mentioned earlier.

7 Q. Was he continuing to move in your direction?

8 A. He was reaching for me.

9 Q. So what did you have to do as he was reaching  
10 for you?

11 A. When I realized that he had gotten much closer  
12 and that he was, I guess -- there's a -- there's a thing  
13 where you see somebody getting ready to set up to punch  
14 you, and he was getting ready to punch me and I perceived  
15 that, at some point, and that's when the pistol came out.

16 Q. What did you do with that pistol?

17 A. I shot him.

18 Q. Did you want to shoot him?

19 A. Absolutely not.

20 Q. So why did you shoot him?

21 A. Well, at that point, it was his life or mine.

22 Q. Did you feel he was going to hurt you?

23 A. No question about it.

24 Q. Mr. Reeves, I'm going to show you what's been  
25 marked as Court's Exhibit Number 16. Actually, it's a

1 copy of Court Exhibit Number 16. If you want me to get --  
2 it's just this is easier. Let's go right from the very  
3 beginning.

4 Mr. Reeves, have you seen Court Exhibit 16  
5 before?

6 A. Yes, sir, I have.

7 (Video playing.)

8 BY MR. ESCOBAR:

9 Q. Mr. Reeves, do you see someone that you  
10 recognize in that frame?

11 A. Yes, sir, I do. I think.

12 Q. And who is that?

13 A. Me.

14 Q. And what are you doing?

15 A. I think that's when we first came into the  
16 theater, my wife and I.

17 Q. Okay.

18 MR. MARTIN: Excuse me, Judge, if we're going to  
19 refer to, quote, "frames," can we -- since we're  
20 stopping it --

21 MR. ESCOBAR: I will.

22 MR. MARTIN: -- to see the frame. So the  
23 record's clear.

24 BY MR. ESCOBAR:

25 Q. 13:14:45.583; is that correct?

1           A.     Yes.

2                   MR. ESCOBAR:   Go ahead.   Stop.

3   BY MR. ESCOBAR:

4           Q.     13:14:48.52, who is that person next to you  
5           there in that frame?

6           A.     That's my wife.   She would have followed me in  
7           because my son was going to sit next to her when he got  
8           there.

9                   MR. ESCOBAR:   Your Honor, we're going to speed  
10           it up if the Court doesn't mind, just to save a  
11           little time.

12                   THE COURT:   Don't mind a bit.

13                   MR. ESCOBAR:   I'm sure you wouldn't.

14   BY MR. ESCOBAR:

15           Q.     Now, Mr. Reeves, for the entire time that Camera  
16           Number 11 was not recording, were you seated there in the  
17           theater with your wife?

18           A.     Yes, sir, I was.

19           Q.     Okay.   13:22:26.347.   Mr. Reeves, do you see  
20           yourself in that particular frame?

21           A.     Yes, sir, I do.

22           Q.     And what do you see yourself doing in that  
23           particular frame?

24           A.     I'm leaning forward in my seat with my right  
25           hand.

1 MS. SUMNER: Could he talk into the microphone,  
2 please?

3 THE WITNESS: Oh, I'm sorry.

4 I'm leaning forward in my seat, and my right arm  
5 is out in front of me.

6 BY MR. ESCOBAR:

7 Q. And what are you doing at this point in time?

8 A. I believe I may have been -- that's when I  
9 leaned over to Mr. Oulson.

10 Q. To speak to him about what?

11 A. To -- when I asked him to please turn his phone  
12 off.

13 Q. Okay. Now, Mr. Reeves, in that last frame right  
14 before this frame, it certainly appeared that your body  
15 had been moving a little bit forward, and here at  
16 13:22:46.568, do you see your body there in that screen?

17 A. Yes, sir, I do.

18 Q. Okay. And we're going to go ahead and play it  
19 to see where your body goes, but do you have any idea what  
20 you were doing with your body during those two frames?

21 A. At this point right now, I'm not exactly sure  
22 time-wise, but...

23 Q. Okay. Well, let's play it to see what...

24 MR. ESCOBAR: Stop.

25

1 BY MR. ESCOBAR:

2 Q. See how your body has just gone back?

3 A. Okay. I'm sitting back and -- I think I'm  
4 sitting back in my seat and I'm putting my popcorn in  
5 my -- back in my lap.

6 Q. Okay. Now, this is about 12 seconds right now  
7 that you've gone back into your seat now before the next  
8 frame.

9 Is that what the recording is saying?

10 A. Yes, sir, I -- yes, sir, it does.

11 MR. ESCOBAR: So let me stop there for a second.

12 BY MR. ESCOBAR:

13 Q. What is happening now, what are you waiting for?

14 A. Mr. Oulson to put his phone away.

15 Q. There was a -- there was about a 17-minute no  
16 recording before this no recording. This was 12. That's  
17 29 seconds; is that correct? Excuse me, 17 seconds, 12  
18 seconds?

19 A. Yeah, about 30 seconds, I think, yes.

20 Q. This is not the first time you've seen this  
21 tape?

22 A. No, sir.

23 MR. ESCOBAR: Go ahead.

24 BY MR. ESCOBAR:

25 Q. We now have another 18 seconds.

1 MR. ESCOBAR: Stop it.

2 BY MR. ESCOBAR:

3 Q. What is happening during this 18-second period?

4 A. I'm waiting.

5 Q. Waiting for?

6 A. For Mr. Oulson.

7 Q. To do what?

8 A. Put his phone away.

9 Q. Okay. Do you wait all that time to have Mr.  
10 Oulson put his phone away?

11 A. Well, yes, sir. I tried to adjust myself in the  
12 seat so that I couldn't see it, but it was, you know -- it  
13 was unavoidable.

14 Q. What was happening with that phone? Where was  
15 it at and how was it affecting you?

16 A. Well, it was -- it was out in front of him  
17 shining between him and his wife right into my face.

18 Q. Okay.

19 MR. ESCOBAR: Stop.

20 BY MR. ESCOBAR:

21 Q. Now what are you doing?

22 MR. MARTIN: Frame number, please?

23 MR. ESCOBAR: Sorry. 13:23:20.335.

24 BY MR. ESCOBAR:

25 Q. What are you doing now?



1           A.    I believe I'm leaning forward.  That's when I  
2    had my second -- when I spoke with him the second time and  
3    I said that -- when he didn't put it away, I said, "You  
4    leave me no alternative other than to involve theater  
5    management."

6           Q.    And his response to you was?

7           A.    "I don't give an F what you do."  Rather loudly.

8           MR. ESCOBAR:  Go ahead.

9    BY MR. ESCOBAR:

10          Q.    Mr. Reeves, what are you doing there now?  
11    That's 13:23:25.707.

12          A.    I'm handing -- as I stood up, I'm handing my  
13    popcorn box to my wife.

14          Q.    And what are you doing after that?

15          A.    Then I -- then I go down the aisle and down the  
16    stairs to see the manager.

17          MR. ESCOBAR:  Your Honor, I promise you I'll  
18    speed up when we get to a particular point that has a  
19    longer segment.  I'm waiting for that.

20          THE COURT:  Okay.

21          MR. ESCOBAR:  Okay.  Stop.

22    BY MR. ESCOBAR:

23          Q.    Mr. Reeves, at 13:26:16.446, is that you again?

24          A.    Yes, sir, it is.

25          Q.    Have you come back from the management front

1 desk?

2 A. Yes, sir, I did.

3 Q. And you're headed back where?

4 A. To my seat.

5 Q. What's happening, again, as you're headed back  
6 in this direction to your seat?

7 A. It's when I saw Chad Oulson kind of staring at  
8 me and I made a comment to him.

9 Q. Why did you make that comment to him?

10 A. De-escalation. The guy wouldn't do anything  
11 wrong. I don't know what the answer to that would be.

12 Q. Did you see the phone on still?

13 A. Sir?

14 Q. Did you see the phone on still?

15 A. No, sir, I didn't.

16 Q. And so what specifically -- when you saw the  
17 phone was not on, what did you tell him?

18 A. I said, "I see that your phone is not on. I'm  
19 sorry I went to the management," or something of that  
20 nature. I don't -- that was the -- that was the content  
21 of what I said. Not the exact words. I mean, I don't  
22 know.

23 MR. ESCOBAR: Go ahead.

24 BY MR. ESCOBAR:

25 Q. What are you doing there?

1           A.    I take the popcorn box from my wife and I sit  
2 down.

3           Q.    That was at 13:26:19.416; is that correct?

4           A.    Yes.

5                   MR. ESCOBAR:   Okay.   Let's stop there for a  
6 second.

7 BY MR. ESCOBAR:

8           Q.    13, 25 -- excuse me.   13:26:25.322.   I'm going  
9 to be pointing to an area right there and ask you who is  
10 that.   That's at the lower right-hand corner of that  
11 frame?

12          A.    That's Chad Oulson.

13          Q.    And what is Mr. Oulson doing at that moment?

14          A.    He's trying to come over the back of the chair  
15 in front of my wife.

16          Q.    Now, we also see in 13:26:25.322, what appears  
17 to be a light of some sort, a white rectangle within the  
18 photo; is that correct?

19          A.    Yes, sir, it is.

20          Q.    I think you probably heard the -- Mr. Koenig,  
21 the expert, describe it as a 2 x 3 pixel object of some  
22 sort?

23          A.    Yes, sir, I did.

24          Q.    Now, I'm going to show you what's been marked as  
25 Defendant's Exhibit Number 29, and I'm going to remove

1     that exhibit from the bag and ask you if you recognize  
2     that exhibit?

3             A.     It looks like it's my right shoe.

4             Q.     Now, does your right shoe have a reflective  
5     character to it?

6             A.     Yes, sir, it does. I think on the back and the  
7     outside of the foot.

8             Q.     Where you see these grey sort of marks  
9     throughout the shoe?

10            A.     Yes, sir.

11            Q.     Silver. I called it grey. It's probably  
12     silver.

13                   And the name of the shoe is Salomon?

14            A.     Yes, sir.

15            Q.     Okay. Now, have you seen yourself in video in  
16     this particular case from the Cobb Theater walking through  
17     the theater and through the concession area where you were  
18     able to see the reflective characters of your shoe?

19            A.     Yes, sir, I have.

20            Q.     And do they appear to be a reflective white type  
21     of character?

22            A.     It comes back as a white light just like that  
23     one, similar to that one.

24            Q.     Okay. Now, do you absolutely know what this 2 x  
25     3 pixel area is that we see here?

1           A.    Absolutely, no.  I don't.

2           Q.    And do you recognize that frame as being the  
3 first frame from the non-recording period immediately  
4 proceeding?

5           A.    Yes, sir, I do.

6           Q.    So prior to this particular frame, Camera Number  
7 11 was not recording?

8           A.    I think that is Camera 11 there.

9           Q.    Camera 11, yeah.  But before-- I'm talking about  
10 before this frame, immediately before.

11          A.    Yeah, right.  It was not recording then.

12          Q.    Okay.  Now, could this particular light that we  
13 see here, could that be a reflection from your shoe?

14          A.    I don't know.  It's possible.

15          Q.    Do you know if at the time that you sat down and  
16 grabbed your popcorn, do you know if you crossed your leg?  
17 For example, I'm going to demonstrate for you myself.

18                Do you know if you sat down and crossed your  
19 leg, your right leg?

20          A.    That's altogether possible, yes, sir.

21          Q.    Is that something that you sometimes do?

22          A.    When I'm relaxing, yes, sir.

23          Q.    What was your intent when you went back into  
24 that theater and grabbed your popcorn?

25          A.    To sit down and enjoy the movie.

1           Q.    Did you have any idea, any intent, any thought  
2 process whatsoever that somehow you were going to get into  
3 some encounter again with Mr. Oulson?

4           A.    Absolutely no idea at all.

5           Q.    Now, let's take a look at the frames that  
6 immediately follow frame number 13:26:25322. I want you  
7 to pay particular attention to that area of that 2 x 3  
8 pixel-lighted area, because I'm going to be asking you  
9 some questions about that --

10          A.    Yes, sir.

11          Q.    -- next.

12          A.    Okay.

13               MR. ESCOBAR: Go ahead. Stop.

14 BY MR. ESCOBAR:

15          Q.    Now, did you see that light move?

16          A.    Yes, sir. It appeared to move, yes, sir.

17          Q.    If that light was a source of your shoe, do you  
18 remember whether or not you moved?

19          A.    That's the same time that I got hit in the face.  
20 It's possible that I moved.

21          Q.    You mean the time where you saw Mr. Oulson  
22 coming over -- over your seat in that first frame of  
23 the -- after the non-recording period?

24          A.    That's the same time I got hit in the face, yes,  
25 sir.

1           Q.    And so did you move when you got hit in the  
2   face?

3           A.    Yes, I did.   I had to have.

4           MR. ESCOBAR:   Go ahead.   Stop.

5   BY MR. ESCOBAR:

6           Q.    Now, it looks like you were -- your upper body  
7   before 13:26:27.824, was forward.   You -- it almost looks  
8   like you had leaned forward.

9                   What were you trying to do there after you were  
10   hit?

11          A.    Get away.

12          Q.    Do what?

13          A.    Get away from him.

14          Q.    Well, what were you -- what was your thought  
15   process?   What were you going to do?

16          A.    My thought process was to stand up.

17          Q.    And did you stand up?

18          A.    No, sir.

19          Q.    And why not?

20          A.    I realized that was not a good decision.

21          Q.    And why is that?

22          A.    I would be getting closer to him.

23          Q.    Now --

24          MR. ESCOBAR:   Stop there.

25

1 BY MR. ESCOBAR:

2 Q. -- before the next recorded image, you've got  
3 seven-plus seconds. I believe when it started, it was  
4 pretty close to eight; is that correct?

5 A. I think so, yes, sir.

6 Q. Please tell the Court what was taking place  
7 between this approximately eight-second period that's not  
8 being recorded again by Camera Number 11?

9 A. Mrs. Oulson was trying to hold him back and he  
10 was pulling away from her. He looked to me like he was  
11 out of control. He was in a fit of rage. He was trying  
12 to get over the seat to me.

13 MR. ESCOBAR: Go ahead.

14 BY MR. ESCOBAR:

15 Q. This is happening all through this period of  
16 time?

17 A. Yes, sir, pretty much.

18 MR. ESCOBAR: Okay. Stop right there.

19 BY MR. ESCOBAR:

20 Q. 13:26:36.366. What are we seeing taking place  
21 down here at the very bottom right-hand corner of this  
22 particular frame?

23 A. Mr. Oulson is reaching over the back of his seat  
24 attacking me. He's trying to come over the seat.

25 Q. And what do you see in addition to what appears



1 to be an arm there? Do you see a body coming over?

2 A. Yes, sir. He's very close to me. His whole  
3 body is there and his arms. He's -- he's -- it looks like  
4 he's pulled away from his wife and that he's -- he's  
5 gotten loose from her and he's trying to come back over  
6 the seat.

7 Q. What have you done at this particular point  
8 while you see that body starting to come over?

9 A. I realized that he's getting ready to attack  
10 again. I'm getting ready to -- I know I have to defend  
11 myself. I've realized that it's now a life-or-death  
12 fight. It's not a -- it's not what it was, which was just  
13 a guy being mouthy. And I realized that I've got to take  
14 some decisive action if I want to survive this thing.

15 Q. And so you pull your weapon?

16 A. Yes, sir.

17 MR. ESCOBAR: Stop.

18 BY MR. ESCOBAR:

19 Q. Now, Mr. Reeves, you saw that hand coming  
20 forward?

21 A. Yes, sir.

22 Q. Did that hand grab your popcorn?

23 A. Yes, sir.

24 Q. Did you realize at the time that this was  
25 happening that that hand had grabbed your popcorn?

1           A.    No, sir, I didn't.

2           Q.    What were you seeing as that individual was  
3 coming towards you?

4           A.    I was seeing a guy attack me and reaching out to  
5 get me.

6           Q.    When he pulled that popcorn back and shoved it  
7 in your face, did you see that popcorn as he was reeling  
8 it back and shoving it in your face?

9           A.    I really don't have any memory of that popcorn,  
10 again, until the deputies asked me about it during the  
11 interview.

12          Q.    What did you tell the deputies during the  
13 interview?

14          A.    When they asked me what happened to the popcorn,  
15 I think I told them that I wasn't sure if I had dropped it  
16 or if he knocked it out of my hand.

17          Q.    So at no point in time did you actually see the  
18 popcorn in Mr. Oulson's hand as he was coming forward  
19 towards you for the second time -- actually, for the third  
20 time, I guess, if we're going to talk about the first one  
21 earlier?

22          A.    I'm sorry. Would you say that again, please?

23          Q.    You didn't see the popcorn?

24          A.    I did not see the popcorn bag. I saw him coming  
25 over the seat after me. I didn't know what happened to

1 the popcorn bag.

2 Q. Did you believe, at that point in time, that you  
3 all -- you had made a decision?

4 A. At that point, yes, I had.

5 Q. And what was the decision that you had made  
6 before that popcorn even struck you?

7 A. I was going to try to shoot him before he hit  
8 me.

9 Q. What was the size of Mr. Oulson that you  
10 perceived as he was there in front of you in that front  
11 row?

12 A. He was a pretty good-sized man. He was pretty  
13 tall.

14 Q. What about his age?

15 A. He was considerably younger than I was. I  
16 estimated his age to the deputies at about 35 or 40.

17 Q. Now, after firing that shot, please tell the  
18 Court what you did with that weapon?

19 A. The first thing I did was put it in my lap.

20 Q. Can you tell the Court, please, why you put that  
21 weapon in your lap?

22 A. Well, I didn't want to be perceived as a problem  
23 for anybody else in the theater.

24 Q. Why is that important?

25 A. I was not a threat to anybody else in that

1 theater.

2 Q. Was the theater still dark at that time?

3 A. Yes, sir.

4 Q. In any of your training, especially with  
5 undercover officers, have you trained them concerning  
6 having a weapon out in a darkened environment?

7 A. Yes, sir, I have.

8 Q. And what has that training been?

9 A. You need to be very cautious. You never know  
10 who is there. You never know who's armed and who is not,  
11 and you never know if there's another officer there. So  
12 if you're not a threat, don't be perceived as a threat.

13 Q. And so that's why you put your weapon on your  
14 left knee?

15 A. Yes, sir.

16 Q. And did an off-duty Sheriff's officer come and  
17 retrieve that weapon from your knee?

18 A. Yes, sir, he did.

19 Q. Mr. Reeves, I'm going to show you what's been  
20 marked as Defendant's Exhibit Number 13 and introduced  
21 into evidence, and ask you if you have seen this  
22 particular exhibit.

23 MR. ESCOBAR: Stop. Go a little bit further.

24 Keep on going.

25

1 BY MR. ESCOBAR:

2 Q. What are we seeing here?

3 A. Chad Oulson's head and arm and it looks like  
4 it's his shoulder.

5 Q. Is that the first attack?

6 A. Yes, sir.

7 Q. And that is frame number 13:26:25.322; is that  
8 correct?

9 A. Yes, sir.

10 MR. ESCOBAR: Stop. Okay.

11 BY MR. ESCOBAR:

12 Q. And this is the 2 x 3 pixel light that we were  
13 talking about before?

14 A. Yes, sir, it is.

15 Q. That could have been maybe a cell phone, but  
16 also it could have been just as well the reflection from  
17 your shoe?

18 A. Yes, sir.

19 Q. I want you to focus now on the movement of this  
20 particular light, if you can for me.

21 Now, Mr. Reeves, law enforcement came and  
22 arrested you; is that correct?

23 A. That's correct.

24 Q. And you were placed in the patrol car?

25 A. Yes, sir, I was.

1 Q. With your hands at your back?

2 A. Yes, sir.

3 Q. About how much did you weigh at the time of this  
4 incident?

5 A. Probably around 260.

6 Q. 260 pounds?

7 A. Yes, sir.

8 Q. Was it difficult to have your hands in your back  
9 seated in a patrol car?

10 A. It was difficult to do that without being in a  
11 patrol car. With being in a patrol car, yes.

12 Q. Okay. And that was because of your conditions  
13 with your shoulders?

14 A. Yes, sir, and my back.

15 Q. You were in the patrol car for how long?

16 A. I estimate around an hour or so, maybe an  
17 hour-and-a-half.

18 Q. In that position?

19 A. Yes, sir.

20 Q. And then what happened?

21 A. The detectives come over and take me out of the  
22 car and put me in their car.

23 Q. Okay. And what -- what did they do about your  
24 handcuffs?

25 A. They moved them from behind me to in front of

1 me.

2 Q. Okay. And you were placed in that car as well?

3 A. I was placed in the detective's passenger side,  
4 yes.

5 Q. Front passenger?

6 A. Yes.

7 Q. And you gave an interview to the detectives?

8 A. Yes, sir.

9 Q. What was your emotional state at the time that  
10 you were interviewed by the detectives?

11 A. Well, I was obviously concerned that I'd been  
12 involved in something I didn't want to be involved in.  
13 There was a chance that someone could lose their life over  
14 it.

15 Q. Did you know at that point in time that Mr.  
16 Oulson had passed?

17 A. No, sir, I didn't.

18 Q. Did you agree to give a statement to law  
19 enforcement?

20 A. Yes, sir, I did.

21 Q. And was that statement given to the best of your  
22 ability at that time?

23 A. Absolutely, yes, sir.

24 Q. Now, after -- after you were interviewed, you  
25 were informed that you were going to be charged with

1 second degree murder?

2 A. That's correct.

3 Q. Is that correct?

4 A. Yes, sir.

5 Q. And photographs were taken of you; is that  
6 correct?

7 A. Yes.

8 MR. ESCOBAR: Your Honor, a photo must have had  
9 one of these rolled tape pieces. Here, I'll point it  
10 out to the Court, so the Court doesn't get confused  
11 with it. Do you see this appears to be a piece of  
12 tape that's stuck there? I don't want to destroy the  
13 photo. I want to make sure you're okay with it.

14 THE COURT: Okay. Show the State. There's a  
15 piece of evidence tape.

16 MR. ESCOBAR: Yeah, well we'll deal with it --

17 MR. MARTIN: We'll deal with it later.

18 BY MR. ESCOBAR:

19 Q. Now, Mr. Reeves, I'm going to show you what's  
20 been marked as Defense Exhibit Number 28, and ask you to  
21 take a look at that and see if you recognize that.

22 A. Yes, sir, I do.

23 Q. And what is that an exhibit of that's been  
24 introduce into evidence?

25 A. That's my hands after the Sheriff's Office had



1 handcuffed me.

2 Q. I want to focus on one particular area of  
3 importance and that is your finger right here.

4 A. Yes.

5 Q. Do you see the red mark there on your finger?

6 MS. SUMNER: If he can indicate which finger he  
7 is referring to?

8 MR. ESCOBAR: The middle finger.

9 MS. SUMNER: Which hand, please?

10 MR. ESCOBAR: On the left.

11 MS. SUMNER: Thank you.

12 BY MR. ESCOBAR:

13 Q. Looking at your middle finger of your left hand,  
14 is that an injury that you had to that hand before January  
15 13, 2014?

16 A. No, sir.

17 Q. Now, the other injuries that you see on your  
18 hand, do you attribute that to anything?

19 A. Well, yeah. Those are the Sheriff's Office  
20 trying to get their handcuffs on me. All that bruising on  
21 both arms.

22 Q. Okay. In your old age, do you bruise easy?

23 A. Very easily, absolutely. Particularly on my  
24 hands and arms.

25 Q. I'm going to show you what's been marked as

1 Defense Exhibit Number 60.

2 Now, immediately after this incident, did you  
3 have a conversation with your wife about what had happened  
4 to you there immediately before -- or not immediately --  
5 but before you had to shoot Mr. Oulson concerning being  
6 struck?

7 A. Yes, sir, I did.

8 Q. What did you tell your wife after you fired your  
9 weapon?

10 A. She wanted to ask me, I think, what happened and  
11 I told her I got hit in the face.

12 Q. Now, before January 13 of 2014, did you have  
13 these red marks here to your left eyelid?

14 A. No, sir, I did not.

15 Q. Do you know how those red marks got there?

16 A. Yeah, I got hit in the face.

17 Q. Now, on your eyelids, do you have some veiny  
18 skin?

19 A. Yes, sir.

20 Q. On both eyelids?

21 A. I assume -- I'm not sure I know what veiny skin  
22 is. I think that's that way all over.

23 Q. That's my layman's medical description. I  
24 apologize, Mr. Reeves.

25 I'm going to show you now what's been marked

1 as --

2 MS. SUMNER: Before we move away, I believe that  
3 that's actually Exhibit 27. I think the 60 must  
4 be --

5 MR. ESCOBAR: Yeah, it was.

6 THE COURT: Yeah, 60 was for the admitted  
7 number.

8 MR. ESCOBAR: It is, Your Honor. It's Number  
9 27.

10 THE COURT: 27. Thank you.

11 BY MR. ESCOBAR:

12 Q. Mr. Reeves, I'm going to show you what's been  
13 marked as Defendant's Exhibit Number 124 and ask you if  
14 you recognize that photo.

15 A. Yes, sir, I do.

16 Q. And what is that a photo of?

17 A. That appears to be a booking photo from the  
18 county jail.

19 Q. Is that the booking photo when you arrived at  
20 the county jail?

21 A. Yes, sir, I think so.

22 MR. ESCOBAR: Your Honor, we would move  
23 Defendant's Exhibit Number 24 into evidence.

24 THE COURT: I thought you said it was 124?

25 MR. ESCOBAR: 124.

1 THE COURT: That would be what?

2 THE CLERK: 48.

3 THE COURT: Any objection?

4 MR. MARTIN: No, Your Honor.

5 THE COURT: It will be admitted as 48.

6 BY MR. ESCOBAR:

7 Q. I'm going to, again, show you what's been marked  
8 as Defendant Exhibit Number 48. I would like you to pay  
9 particular attention to the left side of your left eye.

10 Do you see anything going on right there that  
11 you normally do not have present on your face?

12 A. I think there might be a little bit of swelling  
13 there. It looks like there is some swelling just to the  
14 top side on the outside edge in this area up here.

15 Q. Now, when you were there at booking, was that  
16 area of your face sore?

17 A. Yes, it was.

18 MR. ESCOBAR: May I have a moment, Your Honor?

19 THE COURT: You may.

20 MR. ESCOBAR: Your Honor, we would pass the  
21 witness.

22 THE COURT: Is this a good time for a break?  
23 State will be back at 4:30.

24 (Recess taken.)

25