

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
OF THE STATE OF FLORIDA IN AND FOR PASCO COUNTY

STATE OF FLORIDA,	:
Plaintiff,	:
	:
vs.	: Case No.
	: CRC14-00216 CFAES
CURTIS REEVES,	:
Defendant.	:
-----/	: -----/

Taken by: Glenn L. Martin, Jr., Esquire  
Appeared on Behalf of State

Date: Thursday, October 15, 2015

Time: 9:28 a.m. to 11:14 a.m.

Place: State Attorney's Office  
419 North Pierce Street  
Second Floor  
Tampa, FL

Reported by: KayLynn Boyer  
Court Reporter  
Notary Public  
State of Florida at Largo

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Deposition of:  
JENNIFER SHAW  
-----

2015 DEC -8 AM 10:14  
Paula S. O'Neil  
Clerk & Comptroller  
Pasco County, Florida

FILED FOR RECORD  
PASCO COUNTY, FLORIDA

Pages 1 - 90

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(727) 455-5818  
(727) 391-8613 fax

ORIGINAL

## APPEARANCES:

Glenn Martin, Esquire  
Assistant State Attorney  
14250 49th Street North  
Room 1000  
Clearwater, FL 33762

Appeared on behalf of Plaintiff

Richard Escobar, Esquire  
Escobar & Associates, P.A.  
2917 West Kennedy Boulevard  
Suite 100  
Tampa, FL 33609

Appeared on behalf of Defendant

Dino Michaels, Esquire  
Escobar & Associates, P.A.  
2917 West Kennedy Boulevard  
Suite 100  
Tampa, FL 33609

Appeared on behalf of Defendant

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P R O C E E D I N G S

THEREUPON,

Jennifer Shaw

Was adduced as a witness herein, and, after  
first being duly sworn on oath, was examined and  
testified as follows:

DIRECT EXAMINATION

BY MR. MARTIN:

Q. Would you state your name for the record,  
please.

A. Jennifer Shaw.

Q. And spell your last name, please.

A. S-h-a-w.

Q. Ms. Shaw, my name is Glenn Martin, I'm an  
Assistant State Attorney and I work for Bernie McCabe,  
who is the State Attorney for the Sixth Judicial  
Circuit.

A. Right.

Q. I have been asked to work along with Manny  
Garcia in the case of State vs. Curtis Reeves. And I  
believe Mr. Reeves is your father, correct?

A. Yes.

Q. All right. It is also my understanding through  
pleadings from Mr. Escobar's office that your name has  
been placed on the defense witness list, is that also

1 your understanding?

2 A. Yes, sir.

3 Q. And is it your understanding the reason you're  
4 here today is because your name is on the list, and that  
5 I have a right to ask you questions about your potential  
6 testimony in this case, is that your understanding?

7 A. Yes.

8 Q. Have you ever had your deposition taken before?

9 A. I have.

10 Q. How many times?

11 A. Just once.

12 Q. In a civil or criminal case?

13 A. It was a civil case.

14 Q. Were you represented by an attorney?

15 A. Yes, sir, I was.

16 Q. Was it personal or business?

17 A. Business.

18 Q. Were you deposed as a witness for a business  
19 that you owned or a business that you worked for?

20 A. A business that I worked for.

21 Q. And were you a witness for the defense or the  
22 prosecution?

23 A. For the?

24 Q. For the plaintiff or the respondent?

25 A. Oh, no. We were being sued.

1 Q. All right. And how long was that deposition  
2 length in the room, you talking with the attorneys?

3 A. Maybe about an hour and a half, two hours.

4 Q. All right. During this deposition, if we could  
5 go by these rules, okay; first of all, I'm going to ask  
6 you questions about your knowledge on certain areas of  
7 this case. I'm going to concentrate on a specific time  
8 period, 2013 and 2014. When we deviate from that time  
9 period and we're going to go in a time period that just  
10 encompasses everything I'll let you know, okay?

11 A. Okay.

12 Q. But I'll keep reminding you and we're going to  
13 keep pinning down dates of when you made certain  
14 observations and when things occurred, okay?

15 A. Okay.

16 Q. All right. Next thing is, I need to know what  
17 your personal knowledge is, what your personal  
18 observations are, as opposed to what you heard. If you  
19 heard it from someone, then just tell me that so and so  
20 told me this, or I learned this from A, B, C, whoever it  
21 is.

22 A. Okay.

23 Q. If this is your personal knowledge and you know  
24 it from your own personal observations, I saw, I  
25 observed, I know this, and then if I'm a little hesitant

1 about which one it is I'll ask you. That's what I need  
2 to know, whether or not it's your personal observation  
3 or if you heard it from someone.

4 A. Okay.

5 Q. Fair enough?

6 A. Yes, sir.

7 Q. The other thing is, we can't talk at the same  
8 time. We have, as humans, try to finish other people's  
9 thoughts and sentences, it happens. The court reporter  
10 can't take it down, so I will be mindful and allow you  
11 to finish every sentence and thought that you have, and  
12 I would appreciate that in return, fair enough?

13 A. Yes, sir.

14 Q. If you don't understand my question, and  
15 sometimes I do get tongue-tied and I just go, yeah, I  
16 know, that's a bad question and I'll start it over  
17 again. But if you don't understand it, you have to tell  
18 me you don't understand it. If you don't tell me that I  
19 won't know that you misunderstood my question, all  
20 right? So if you don't understand, just tell me, repeat  
21 it, I don't understand, okay?

22 A. Yes, sir.

23 Q. The other thing is, I need to know the absolute  
24 truth. I'm not saying you're going to lie, but what I'm  
25 saying is, this is the time for you to be truthful and

1 candid with me, all right? So both Mr. Escobar and I  
2 only want the truth. We can handle whatever the truth  
3 is, we will deal with it, wherever it falls, okay?

4 A. Yes, sir.

5 Q. But I need to know what the truth is. You tell  
6 us to the best of your ability and what you know and let  
7 the lawyers figure out how we're going to use the facts,  
8 fair enough?

9 A. Yes, sir.

10 Q. All right. Any questions before we get  
11 started?

12 A. No, sir.

13 Q. All right. Here's what I would like to do; I  
14 will tell you that I did read through the transcript of  
15 your bond hearing, when you testified at the bond  
16 hearing. And a lot of my questions are going to touch  
17 upon some of the areas that were covered during the bond  
18 hearing. I also have some additional areas. I'm not  
19 going to try to trick you or anything. As I go from  
20 area to area to topic to topic, I'll tell you that we're  
21 changing topics and we're going to talk about this  
22 particular area so you can get your mind focused on that  
23 topic, all right?

24 A. Okay.

25 Q. First of all, I'd like to get a little



1 background from you. If you can tell me whether or not  
2 you're married, children, how old you are and where you  
3 live?

4 A. Okay.

5 Q. That's easy?

6 A. Yes, sir. I will be -- I'm 41, I am currently  
7 married but going through a divorce.

8 Q. All right.

9 A. I've been separated for a little over two and a  
10 half years now.

11 Q. All right.

12 A. And I currently live in Brooksville with my  
13 parents, Curtis and Vivian Reeves.

14 Q. When did you begin living with Curtis and  
15 Vivian Reeves?

16 A. I think it was like April 28th of 2013.

17 Q. Is that full time? That is, when you go to  
18 work you leave Mr. Reeves' home, go to work, and you  
19 come home from work to Mr. Reeves'?

20 A. Correct.

21 Q. I mean, that's your personal residence at this  
22 time?

23 A. Yes, sir.

24 Q. Prior to you living, I'll call it full time, at  
25 the Reeves residence in Brooksville, how often did you

1 have contact with your father, Mr. Reeves?

2 A. Physical contact or phone contact?

3 Q. Physical, where you would be in his presence?

4 A. It kind of depends. Sometimes once or twice a  
5 week, sometimes every other week. We had no regular  
6 schedule.

7 Q. All right. I want to concentrate on that time  
8 period before you began living with Mr. Reeves, okay?

9 A. Okay.

10 Q. As far as your contact with him of once or  
11 twice a week as far as being in his physical presence,  
12 did you do any activities with Mr. Reeves or your mom?  
13 Movies, walking, vacation, see what I'm getting at?  
14 Tell me what kind of activities you were engaged in with  
15 your father.

16 A. Every year we took a family vacation, which  
17 included --

18 Q. Here's my problem, and I interrupted you  
19 because I violated my own rule. I know we're talking  
20 about prior to '13. I'm really concerned with, and I  
21 kind of want to narrow it down. Let's not go past 2010,  
22 okay? I mean, there may be things you did in your  
23 childhood, but let's talk about adult things from 2010  
24 to 2013.

25 A. Okay.

1           Q.     **Okay. Go ahead.**

2           A.     I'm going to head down the same path because we  
3 did this as adults too. Obviously I was with my husband  
4 prior to living there, and every year in October we  
5 would take a family vacation, which included both my  
6 parents, my husband and myself, and my brother most of  
7 the time, and we would rent a home up there.

8           Q.     **Where's up there?**

9           A.     North Carolina. So yes, we did family  
10 vacations. I have had the opportunity to go kayaking  
11 with my parents. That usually involved my brother and I  
12 and my mom and dad. Let's see, family get-togethers,  
13 barbecues, game night where we all sit around and play  
14 Scrabble. We still do that now and did that then.

15          Q.     **Okay.**

16          A.     I'm trying to think. Constantly having what  
17 dad referred to as family night. As Matt and I got  
18 older dad decided that I don't see you guys enough so we  
19 are enacting family night, and regardless of what you  
20 are doing at least once a month we will get together at  
21 someone's home and do that. So that was going on at the  
22 same time.

23          Q.     **Okay. When did your father retire from Busch**  
24 **Gardens?**

25          A.     Oh my goodness, I don't remember the date.

1 Q. Okay. If you could help me out, in 2010 had he  
2 retired from Busch Gardens?

3 A. I believe he had.

4 Q. Okay. So now let's concentrate on 2013. In  
5 October of 2013 did you take your North Carolina trip?

6 A. Yes, sir, I believe we did. Yes, we did.

7 Q. Where did you go?

8 A. We went to North Carolina and we were in, I  
9 think the Highlands area.

10 Q. Okay.

11 A. We rented a home.

12 Q. How did you get up there?

13 A. We drove.

14 Q. And who drove?

15 A. In my vehicle.

16 Q. Let me ask you this, how did Mr. Reeves get up  
17 there?

18 A. Okay, wait, let's back up. It wasn't in  
19 Highlands that year, it was in Franklin. And my mother  
20 and father drove up together, and I'm trying to figure  
21 out when my husband wasn't there and when he was there.  
22 So I might have my cities mixed up, but we drove up  
23 there. My parents drove up together and my daughter and  
24 I drove up together. I believe that my brother actually  
25 rode with Madison and I.

1 Q. Okay. And as far as Mr. Reeves, whenever I  
2 refer to Mr. Reeves I'm referring to your father and not  
3 your brother, okay?

4 A. Okay.

5 Q. As far as Mr. Reeves, when he drove up there he  
6 was actually the one doing the driving?

7 A. I'm not sure if he drove or my mother drove, I  
8 wasn't with them.

9 Q. Does your mother, Vivian, drive with Mr. Reeves  
10 as a passenger?

11 A. On occasion, I believe so, yes.

12 Q. Okay. How about on this particular trip, did  
13 she do any of the driving that you're aware of, or did  
14 he do all the driving?

15 A. That I'm aware of, and when I was present he  
16 was doing the driving.

17 Q. All right. And in October of 2013 in North  
18 Carolina, Franklin, what activities did you all  
19 participate in?

20 A. We had rented a house on a river and my brother  
21 and dad did a lot of fishing.

22 Q. Okay.

23 A. I think we did some, just some walking in  
24 certain areas, and drove around to different towns and  
25 looked at antique shops and things like that. I don't

1 remember anything else that we did that year.

2 Q. Did you go fishing?

3 A. I did not. My brother and my dad did.

4 Q. And I'm going to refer to it as back country  
5 fishing, where you park and have to walk in the woods  
6 some place to get to the stream?

7 A. No, the house we rented was right on the river  
8 so it was literally in the back yard.

9 Q. All right. So that was the type of fishing.  
10 As far as the walking, walking as opposed to hiking, or  
11 walking shopping? Did you go walk in the woods, did you  
12 go --

13 A. I definitely remember walking shopping.

14 Q. Okay.

15 A. I don't remember doing very much hiking that  
16 year.

17 Q. All right.

18 A. We had done that in previous years, but I don't  
19 think we did that that year.

20 Q. And Mr. Reeves was with you during these  
21 shopping trips?

22 A. Yes, sir.

23 Q. All right. And he was walking around with the  
24 family?

25 A. Yes, sir.

1 Q. Was that an all day event or just half a day?  
2 As far as I know you were up there for multiple days,  
3 but when you went shopping did you go for hours at a  
4 time or for a day at a time, how did you make the  
5 shopping trip?

6 A. Probably not full days, maybe half a day or  
7 something. We would go to different shops, have lunch  
8 somewhere.

9 Q. Okay. And how long were you up there?

10 A. I was up there a week.

11 Q. And Mr. Reeves?

12 A. I can't remember. Sometimes they would stay up  
13 for like two weeks and me and Matt and Madison and my  
14 husband at the time, if we were together, would come up  
15 for a week. I don't remember on that particular  
16 occasion if they stayed later or not.

17 Q. While you were up in Franklin, North Carolina,  
18 Mr. Reeves drove the family around or was he driven  
19 around by other people?

20 A. I believe he drove us all around at that visit.

21 Q. During the day and night?

22 A. Yes, sir.

23 Q. At any time, I'm just going to refer to this  
24 particular trip and then I'll ask you overall. At any  
25 time when Mr. Reeves was driving did you ever feel that

1    **he was driving unsafe or anything like that?**

2       A.    No, sir.

3       Q.    **Did you feel comfortable with him driving?**

4       A.    Yes, sir.

5       Q.    **Both day and night?**

6       A.    Yes, sir.

7       Q.    **Again let's talk about 2013, the kayaking.**

8    **Tell me about kayaking in 2013. The number of trips,**  
9    **and I'm only concerned with Mr. Reeves being present and**  
10   **participating.**

11       A.    Okay. I can only think of one time that the  
12   four of us went kayaking, my father, my mother, my  
13   brother, and myself.

14       Q.    **When was that in 2013?**

15       A.    It was in April.

16       Q.    **In April?**

17       A.    It was right about the time I moved in.

18       Q.    **Okay. And where did you all go?**

19       A.    Weeki Wachee River.

20       Q.    **Did you rent the kayak or have your own?**

21       A.    No, sir, my brother has two and my parents have  
22   two, so we had our own.

23       Q.    **And how do you get the kayaks there?**

24       A.    On the vehicle, or trailer.

25       Q.    **Okay.**



1           A.     Matt's were in the back of his truck, and my  
2     dad had a small trailer they were on the back of.

3           Q.     All right. And how were the kayaks taken on  
4     and off the trailer?

5           A.     By hand, lifted off.

6           Q.     Did Mr. Reeves do that?

7           A.     I think he did lift it off.

8           Q.     As far as the trailer on Mr. Reeves' car, as  
9     far as hitching it up and moving the trailer around, did  
10    Mr. Reeves do that?

11          A.     I believe so, yes.

12          Q.     Okay. The kayaks, are they single or two man  
13    kayaks?

14          A.     Single.

15          Q.     I may use the wrong term, but I'm familiar with  
16    seat kayaks that have a rudder on the back, and some  
17    that don't have pedals. Tell me about your kayak.

18          A.     It's just basically a plastic hull, there is no  
19    rudder, no pedals, or anything like that.

20          Q.     Single?

21          A.     Yes, sir.

22          Q.     You just paddle?

23          A.     Yes, sir.

24          Q.     And did your dad, Mr. Reeves, kayak with you  
25    all in April 2013?

1 A. He did.

2 Q. **He paddled a kayak?**

3 A. Yes, sir, he did.

4 Q. **That was in Weeki Wachee?**

5 A. Yes, sir.

6 Q. **Is there a river that flows through there?**

7 A. There is a river that flows through there. And  
8 dad -- I know mom and dad have gone on other occasions  
9 when I wasn't present in previous years, but dad's the  
10 one that looked at the tide and make sure that we don't  
11 have to paddle upstream.

12 Q. **Okay. And how long was that -- in April how**  
13 **long did that kayak trip take?**

14 A. I've only done that river once, I believe it  
15 was a couple hours, maybe two hours or so.

16 Q. **All right. So Mr. Reeves and your mom, Vivian**  
17 **were in their own kayak?**

18 A. Individually in their own, yes, sir.

19 Q. **And both of them did their own paddling?**

20 A. Yes, sir.

21 Q. **Okay. Just talk a little bit about the**  
22 **barbecues. Let's talk about in 2013, and kind of work**  
23 **backwards. And we'll use Christmas 2013 as the end**  
24 **point. Prior to Christmas 2013, and after Thanksgiving,**  
25 **was there any kind of barbecue event? I'm just trying**

1 to get some times.

2 A. Sure. And I can't say that there was in that  
3 particular time frame. I'm not certain.

4 Q. Okay.

5 A. I know I'm pretty safe to say we would have had  
6 family dinner in there which may have included grilling  
7 out, but I can't say for certain if they had a big  
8 barbecue with the entire family or what have you. But I  
9 would be pretty certain to say that my brother and I  
10 were there for dinner.

11 Q. Okay. What I would like to do now is to move  
12 on to January 13th, 2014, the time of the shooting,  
13 okay?

14 A. (Nodding head)

15 Q. How did you learn about the shooting?

16 A. My brother called me.

17 Q. Okay. And what did he tell you?

18 A. I was at work and he told me that there had  
19 been an incident at the movie theater in Wesley Chapel,  
20 and I needed to leave work, go pick up my daughter from  
21 day care and head to the house.

22 Q. During that particular phone call did he  
23 provide you any information about what had occurred  
24 inside the movie theater?

25 A. No. I did ask him what had occurred, he said

1 dad was involved, and that was all the information that  
2 I had.

3 Q. Did he say how dad was involved?

4 A. I don't believe so at that time, no.

5 Q. Okay. Well, at that time he told you there was  
6 a shooting, did he tell you that your dad was the  
7 shooter or was he the one injured?

8 A. Oh, he did say he wasn't hurt.

9 Q. So at this point did you make an assumption  
10 that your dad was the one doing the shooting?

11 A. I really didn't know what had happened, and he  
12 wouldn't give me any information.

13 Q. About how long did that phone call last?

14 A. Maybe two minutes.

15 Q. All right. After that phone call who did you  
16 speak with next that provided you any information about  
17 what had happened at the theater?

18 A. It wouldn't have been until that night until my  
19 brother and mom got home.

20 Q. And where did you meet with Matthew Reeves and  
21 Vivian Reeves?

22 A. I was at my current home, which is my parents'  
23 home.

24 Q. First of all, tell me what Matthew told you  
25 about what happened at the theater?

1           A.     Matthew just told me -- Matt told me there was  
2     a shooting. Just to kind of give you a little bit of  
3     information, once the three of us got -- obviously Matt  
4     called me again a little bit later. I was at the house  
5     and had my daughter, and he told me, look, we need to  
6     hire an attorney, we need to do this. So at that point  
7     in time I learned that my dad was, in fact, involved, or  
8     his involvement.

9                     And then when we got to the house my first  
10    reaction to my mother is kind of in shock, and my  
11    brother being there was like, hey, look, at some point  
12    in time we are going to be asked if we discussed this,  
13    and we need to definitely make sure that we're all on  
14    the same page and we are not discussing the case. So  
15    that night the only thing that was discussed was my  
16    mother crying and saying that she wished she had been a  
17    better witness because she was scared to death and ran.

18           Q.     **Okay. We're going to go in a little more**  
19    **detail about that in a minute, but let's get through**  
20    **what Matt was telling you about the incident. He may**  
21    **have told you, look, we're not going to discuss this**  
22    **case together. So let me ask you this; when your**  
23    **mother, Vivian, was not present and it was just you and**  
24    **him, what did Matthew tell you about the incident?**

25           A.     Nothing.

1 Q. Okay. He didn't tell you that he was there, he  
2 didn't tell you what he witnessed, what he saw, he  
3 didn't tell you anything?

4 A. I knew he was there because I asked him at some  
5 point, and I don't remember which conversation, but I  
6 asked him, you know, how did you end up there, and he  
7 told me he was going to meet, he was going to meet mom  
8 and dad at the movies. So that's how he told me he was  
9 there.

10 Q. All right. Did he tell you anything about the  
11 observations when he got there, about his contact with  
12 your mother, your father, with Chad Oulson, the man that  
13 was shot? Did he give you any information about his  
14 contact with any of those people?

15 A. Not at that time.

16 Q. Okay. We're to stay at that time, okay. Let's  
17 talk about your mother. When your mother was not in the  
18 presence of Matthew what did your mother tell you about  
19 the incident?

20 A. I just remember her talking about how scared  
21 she was, and that she said, your father never raised his  
22 voice, and this man was screaming obscenities.

23 Q. Did she tell you what she saw?

24 A. She did not.

25 Q. Did she make any statements about what she saw

1 Chad Oulson, that's the gentleman that was shot, was  
2 doing prior to being shot by your father, Mr. Reeves?

3 A. Not at that time, no.

4 Q. Did your mother, and we're going to stay at  
5 that time, provide you any information about what she  
6 saw your father, Mr. Reeves, do in relation to the  
7 shooting?

8 A. No, sir.

9 Q. Okay. Did there come a point in time when you  
10 had a discussion with your brother, Matthew, about his  
11 observations at the theater?

12 A. No, sir.

13 Q. Did there ever come a point in time, up until  
14 the time we're speaking today, that Matthew told you  
15 what his observations were when he walked into the movie  
16 theater on January 13?

17 A. No, sir.

18 Q. Did he ever tell you about any contact with  
19 your mother, father, or Chad Oulson on January 13th  
20 about what they said or what he saw?

21 A. I have heard, and I do not know, I do not know  
22 when, what time frame I actually heard this, but I did  
23 hear, and I think it was about the time frame that the  
24 Sheriff was giving out awards to first responders to Mr.  
25 Oulson, and I did hear at that point in time, and I

1 can't recall from who, that Matt was the first  
2 responder.

3 Q. So we're clear, up until today you've had  
4 absolutely no conversations with Matthew about what he  
5 observed?

6 A. No, sir.

7 Q. You have no idea what he did, saw, participated  
8 in, after the fact?

9 A. I heard things. Like I said, I heard he was  
10 the first responder. I heard he was the first one to  
11 Mr. Oulson, but that conversation wasn't between my  
12 brother and I.

13 Q. That's my question, what did your brother tell  
14 you? You told me absolutely nothing?

15 A. We have not had a conversation about it, no.

16 Q. What about your mother? Up until today have  
17 you had any conversation with your mother, Vivian  
18 Reeves, about what she saw on January 13, 2013?

19 A. No.

20 Q. Did you have any conversations with your  
21 mother, Vivian Reeves, about how she felt about the  
22 shooting?

23 A. Other than the fact that she expressed to me  
24 repeatedly that she was terrified, no, sir.

25 Q. Did she elaborate why she felt terrified?



1           A.     I want to say she told me the guy was standing  
2 up at some point, and that he was screaming obscenities,  
3 which would definitely terrify my mother because we  
4 don't talk like that.

5           Q.     **What did she say about Mr. Oulson standing up?**

6           A.     Nothing other than at some point he was  
7 standing up.

8           Q.     **The reason I ask the question is because the**  
9 **first question before that was how your mother felt, she**  
10 **felt terrified, then you added that he stood up. So I'm**  
11 **trying to get a little more what did she say about**  
12 **standing up and how that relates, at least in her mind,**  
13 **that she was terrified. Did she explain that to you,**  
14 **what Mr. Oulson was doing?**

15          A.     Other than --

16          Q.     **Standing up?**

17          A.     Other than using foul language.

18          Q.     **He was standing up?**

19          A.     At some point, I believe that's what she told  
20 me, or what she said. I don't remember what time frame  
21 that was though. But at some point he was standing up  
22 and he was using foul language.

23          Q.     **Did you have any discussion with Vivian Reeves**  
24 **about your father going to the manager of the theater**  
25 **and complaining about Mr. Oulson?**

1           A.    No, sir, not that I recall.

2           Q.    Well, what does that mean, you don't recall?

3   **It could have happened?**

4           A.    No, I've seen it on the news, but I don't  
5 have -- I don't recall any conversation with my mother  
6 about that.

7           Q.    We're going to talk now, still on January 13  
8 forward, your first contact with your father after he  
9 was arrested, when was that?

10          A.    I believe it was a couple days later, a day or  
11 two later. I know we struggled trying to figure out how  
12 to use the phone system and all of that. I believe it  
13 was when we were at the attorney's office.

14          Q.    All right. Did you have -- was it a phone jail  
15 visitation? I'm trying to figure out how you had  
16 contact with him.

17          A.    It was definitely a phone conversation.

18          Q.    All right. And your father was in jail?

19          A.    Yes, sir.

20          Q.    All right. And did you go through the system  
21 that they have set up as far as speaking with inmates at  
22 the jail you get a little warning that the conversation  
23 was going to be recorded, things like that?

24          A.    I don't recall if we did at that point in time,  
25 but I know exactly what you're talking about from

1 subsequent calls. I don't remember on that particular  
2 call if that was.

3 Q. But all the contact with your father was a  
4 phone visitation?

5 A. No. No, because we visited him at the jail  
6 prior to them changing their policy to where all  
7 visitation was by phone, we did go to the jail.

8 Q. All right. Let's start with just the first  
9 contact, was it phone or jail?

10 A. Phone.

11 Q. All right. The second contact, phone or jail?

12 A. I don't remember.

13 Q. When did it come a point that you had physical,  
14 I don't want to say physical, but jail contact with Mr.  
15 Reeves?

16 A. I want to say that it took a couple weeks to  
17 get that in place, but I don't recall the time frame.

18 Q. How often would you visit Mr. Reeves either on  
19 the phone or at the jail?

20 A. The policies at the jail changed, we were  
21 allowed to visit the jail. If I recall correctly we  
22 were allowed to visit once a week, and we were there;  
23 me, my brother, and my mother. On the phone visits,  
24 that was before they had the video phone thing in place,  
25 I believe, at the beginning. When he was allowed to

1 call home or allowed to make a phone call, he would call  
2 one of us.

3 Q. Okay. During any of the visits with your  
4 father while he was incarcerated what did your father  
5 say to you or in your presence to Vivian and Matthew  
6 about what occurred in the theater?

7 A. We've never talked about the specifics of what  
8 occurred inside the theater.

9 Q. All right. That kind of begs the question, if  
10 it wasn't specifics did you talk in generalities what  
11 occurred?

12 A. No, not that I can recall. I remember on that  
13 first conversation my dad's main concern was my brother  
14 being in law enforcement and it affecting his career,  
15 and me going through a divorce and it affecting my  
16 divorce. That was his main concern in the very  
17 beginning.

18 Q. Has he made any statements to you regarding  
19 what occurred inside the theater on January 13, Mr.  
20 Reeves?

21 A. Not to me. But I have heard him tell someone  
22 else that he was defending himself.

23 Q. Who did he tell that to?

24 A. I think it was the paramedics and the fire  
25 fighters when he broke his hip, because they asked about

1 the ankle monitor.

2 Q. Okay. That was in 2014, sometime way after,  
3 after he was released?

4 A. Yes, sir.

5 Q. All right. Other than that any other  
6 statements that he made about what happened inside the  
7 theater on January 13?

8 A. No, sir.

9 Q. Shift gears again a little bit, we're going to  
10 talk about Mr. Reeves' daily activities, and I want to  
11 concentrate on 2013.

12 A. Okay.

13 Q. One year prior to this incident. A lot of the  
14 questions I'm going to ask you are going to be follow-up  
15 to some of the responses to the questions during your  
16 testimony during the bond hearing.

17 A. Okay.

18 Q. All right. So in 2013, beginning in April, you  
19 began living with Mr. Reeves and your mother, Vivian?

20 A. Correct.

21 Q. During that time period what were the hobbies  
22 that Mr. Reeves was involved in?

23 A. He rode his bicycle, he shot sporting clays,  
24 they owned the kayaks at that point in time so they went  
25 kayaking on occasion.

1 Q. Okay.

2 A. And I know, I believe they walked around the  
3 neighborhood.

4 Q. Okay.

5 A. I can't think of anything else right offhand.

6 Q. Any archery in the back yard?

7 A. Oh, yes. Yes, he did. He did have. He has a  
8 bow and arrow and he has archery targets set up.

9 Q. Anything else?

10 A. Other than maintaining his home I can't think  
11 of any other hobbies.

12 Q. Woodworking?

13 A. He hasn't done that in years. I didn't see him  
14 do any of that that year.

15 Q. I'm going to start backwards; as far as  
16 maintaining the home, what did he do to maintain the  
17 home?

18 A. Mow the grass.

19 Q. All right.

20 A. Blow off the driveway.

21 Q. Okay.

22 A. Trim the hedges. My parents do that together.

23 Q. And you witnessed all this occurring at various  
24 times in 2013? At least after -- let's talk about from  
25 the time that you began living there in April, which

1 would be the most opportune time for you to make these  
2 observations, is that what you're telling me, during  
3 that time period, April until --

4 A. Most the time I never witnessed it because I  
5 was at work, but I came home and it was done, and pretty  
6 much assumed the two of them did it.

7 Q. He doesn't have a maintenance man?

8 A. No, he does not.

9 Q. So you may not have observed him maintaining  
10 the home as you described every time it was done, have  
11 you at least seen him do it once? You know he does it?

12 A. Yes.

13 Q. And he is the one that -- see, I told you there  
14 was going to come a time when my tongue got tangled up,  
15 this is it. We're going to start over.

16 As far as maintaining the home, we're going to  
17 talk about the outside. He is the one that gets the  
18 mower out, he's the one that pushes the mower, he's the  
19 one that trims the hedges?

20 A. They have a riding lawn mower, they don't have  
21 a push mower.

22 Q. All right. Is it an electric start?

23 A. Yes, sir.

24 Q. All right. As far as the trimming of the  
25 bushes it is manual clippers or is it one of those

1 **battery operated electric hedge trimmers?**

2 A. I have not seen him do that.

3 Q. **Trim?**

4 A. Yeah. So I'm not sure. I know my mother has  
5 pruners so when she does it she definitely uses the  
6 manual ones. I do not know if he has electric hedge  
7 trimmers or not.

8 Q. **All right. Any other maintenance of the home,**  
9 **like painting, power washing, raking of leaves? I don't**  
10 **know the lay-out of your home, that's why I'm asking.**

11 A. He has the back porch he'll, what do you call  
12 it, you referred to it as power wash, pressure washer,  
13 that kind of thing. We have pressure washed the back  
14 porch, the siding on the back of the house and the  
15 floor, and then the blower where he blows off the  
16 driveway when he's done.

17 Q. **Do you all have a pool?**

18 A. We do not.

19 Q. **Let's talk about the archery in the back yard,**  
20 **is that Mr. Reeves' hobby?**

21 A. Him and my brother, yes, sir.

22 Q. **Is there a permanent target in the yard or is**  
23 **it one that's in the garage and you have to take it out**  
24 **to the yard?**

25 A. It's a -- sometimes he left it outside,



1 sometimes he put it away, but it's portable. It's like  
2 a bag.

3 Q. **It's a bag that the arrow sticks in?**

4 A. Yes, sir.

5 Q. **Is there a special arrow for that bag as**  
6 **opposed to a hunting arrow?**

7 A. Yes, sir.

8 Q. **The bow that he has, what type of bow?**

9 A. I've seen his bows in the house, again not  
10 being at home during the daytime I haven't -- I don't  
11 think I've seen him shoot outside. I know that because  
12 I've heard it talked about over dinner that he went, you  
13 know, what he would say, I slung a few arrows today,  
14 that kind of thing. But I know he owns a compound bow  
15 and I know he also owns a recurve bow, but which one he  
16 was shooting at the time I do not know.

17 Q. **How frequently does he do that activity out in**  
18 **the back yard? Goes out with one of these bows and**  
19 **practices?**

20 A. I'm not certain, I can't answer that. I know  
21 leading up to a hunting trip him and my brother, and  
22 again my time frames are going to be off here because I  
23 don't remember when they went hunting last, but I know  
24 leading up to that you practice a little bit more than  
25 you would normally do.

1 Q. Let's talk about the walks. How often would he  
2 go out for walks?

3 A. At least a couple times a week around the  
4 neighborhood.

5 Q. All right. Again 2013, how long, I'm talking  
6 about distance, blocks, miles, whatever you can?

7 A. They would just walk right around the  
8 neighborhood, I'm not quite sure of the exact distance,  
9 but I'm going to say if they went around twice it's  
10 maybe a mile and a quarter.

11 Q. Okay. Time-wise how long? 15 minute walk.

12 A. No.

13 Q. 30 minute walk?

14 A. 45 minutes, an hour.

15 Q. Okay. That was two or three times a week?

16 A. Yes, sir.

17 Q. And was that something that consistently  
18 occurred right up until January 13, 2014?

19 A. Yes, sir, I believe so.

20 Q. All right. Let's talk about the kayaking which  
21 we have already touched upon. In October of 2013 there  
22 was a kayak trip, a trailer that the kayaks were on,  
23 where was that stored?

24 A. That was in April 2013, I believe you said  
25 October.

1 Q. That's what I have in my notes. I apologize,  
2 October was North Carolina.

3 A. North Carolina, yes, sir.

4 Q. April of 2013, I apologize.

5 A. I just want to make sure I'm on the same page.

6 Q. We're on the same page. The trailer, where is  
7 it kept?

8 A. My father doesn't own it anymore. I think my  
9 brother has it at his house.

10 Q. In 2013?

11 A. Oh, it was in the back yard.

12 Q. And how did the trailer get from the back yard  
13 to it being put on the car?

14 A. The back yard is fenced, but it has double  
15 gates and dad would drive back there and hook it up.

16 Q. Drive the car back there?

17 A. Yes, sir.

18 Q. The kayaks, where were they stored in 2013?

19 A. In the back yard also.

20 Q. Are they up on a rack, on the ground?

21 A. I believe he stored them on the trailer at that  
22 point in time.

23 Q. So it was a unit then, the trailer and kayaks  
24 were in the back yard as a unit? That's where it was  
25 kept, not separately?

1           A.     I don't believe so.

2           Q.     Okay. And then your father would hook up the  
3 trailer to the car?

4           A.     Yes, sir.

5           Q.     We talked a little bit about the April 2013  
6 kayak trip, do you recall any other kayak trips in 2013?

7           A.     No, sir. That was the only one I was involved  
8 in.

9           Q.     That's my next question, were there any trips  
10 that you were aware of because either Matthew told you,  
11 or Mr. Reeves told you or your mother told you?

12          A.     Not that I recall.

13          Q.     Okay. Only one?

14          A.     That I'm aware of, or that I remember.

15          Q.     Okay. Let's talk about the paddles for the  
16 kayaks, where are they stored?

17          A.     Maybe in the back garage. I'm not certain of  
18 that. They would have been in the garage though.

19          Q.     And what kind of paddles are they? Here's what  
20 I'm looking for, don't want to prolong it. Are they one  
21 piece or two piece or three piece?

22          A.     They are two piece paddles with a paddle on  
23 each end.

24          Q.     And how is that paddle put together?

25          A.     It's put together just -- I'm not sure how it

1 locks together but I know it's like a friction, it's  
2 kind of a tight fit.

3 Q. **And is there a pin that snaps up?**

4 A. That's what I'm not sure of. I'm not certain  
5 on that. I don't believe there is, they are just pull  
6 apart.

7 Q. **Okay. And those are paddles that Mr. Reeves**  
8 **would use?**

9 A. Yes, sir.

10 Q. **And the paddles that he used in April 2013?**

11 A. Yes, sir.

12 Q. **All right.**

13 A. When we got back from that trip, that's the  
14 time that he couldn't pull the paddles apart. He had  
15 put them together for the trip and he asked me to come  
16 out to the garage and help him get them apart.

17 Q. **And how did you do that?**

18 A. I grabbed one end and he grabbed the other and  
19 we pulled the best we could.

20 Q. **It was stuck?**

21 A. It was not coming apart very easily.

22 Q. **Okay. So he had one end and you had the other?**

23 A. Yes, sir.

24 Q. **That kind of begs the question, did the paddle**  
25 **come apart?**

1 A. Eventually.

2 Q. **A lot of tugging and pulling?**

3 A. It was more twisting but it was tugging and  
4 pulling.

5 Q. **All right. About how long did you all work on**  
6 **that?**

7 A. Oh, gosh, ten minutes maybe.

8 Q. **Okay. But together with him on one end and you**  
9 **on the other twisting you were able to get it apart?**

10 A. Eventually, yes, sir.

11 Q. **All right. Let's talk about the sporting clay.**  
12 **Sporting clay, my understanding, involves some sort of**  
13 **firearm, probably a shotgun of some sort. Does Mr.**  
14 **Reeves have a shotgun?**

15 A. Yes, sir.

16 Q. **Have you been sporting clay shooting with your**  
17 **father?**

18 A. I have.

19 Q. **Let's talk about 2013, did you go sporting clay**  
20 **shooting with your father?**

21 A. There's not a particular incident that I  
22 remember where we went, but I'm positive that we did.

23 Q. **And do you have your own shotgun?**

24 A. My father has given me a shotgun. I used my  
25 husband's when we were together.

1           Q.     **Let's concentrate on Mr. Reeves' shotgun. 12**  
2     **gauge, 20 gauge?**

3           A.     12 gauge.

4           Q.     **Over under, side by side?**

5           A.     It's not an over under, and it's not a side by  
6     side, you load one and it shoots one at a time.

7           Q.     **Shoots one at a time?**

8           A.     You can load two shells into it but they come  
9     out the same barrel, it's not a double barrel or  
10    anything.

11          Q.     **When you load the shotgun is the breech**  
12    **underneath where the trigger is and you push the shells**  
13    **in?**

14          A.     Yes, sir.

15          Q.     **Okay. It's not you break it up and drop it in?**

16          A.     No.

17          Q.     **Okay. And you push it with your thumb and get**  
18    **the shells in?**

19          A.     Yes, sir.

20          Q.     **And how often in 2013 did go sporting clay**  
21    **shooting with the shotgun?**

22          A.     Did I personally go?

23          Q.     **Yeah, with Mr. Reeves. I know you don't know**  
24    **the locations, but approximately how many times?**

25          A.     Maybe two or three times that year. Again I'm

1 just kind of guessing.

2 Q. At the places that you went to did it have golf  
3 carts for you to drive from station to station or did  
4 you have to walk?

5 A. They do offer golf carts but we typically walk  
6 the course.

7 Q. Okay. Did you go to the one in Land O Lakes?

8 A. Hm-mm, Tampa Bay Sporting Club.

9 Q. The terrain there, would you consider woodsy?

10 A. It's woodsy but there's roads for the golf  
11 carts.

12 Q. Sure. Are they gravel?

13 A. No, sir.

14 Q. They paved?

15 A. No, sir, they are just dirt.

16 Q. Dirt, okay. Hills?

17 A. Not really.

18 Q. In Florida there are some hills but not many.

19 A. There are some, but not there.

20 Q. Okay. So you walk from station to station on  
21 the dirt roads when you do the sporting clay?

22 A. Yes, sir.

23 Q. And Mr. Reeves carries a shotgun?

24 A. Yes, sir.

25 Q. How does he carry it? Here's the reason I'm



1 asking; you know when a breech is there and you see two,  
2 you see the guys with it just slung on their shoulder  
3 with it broken, right?

4 A. Sure.

5 Q. All right. This one doesn't do that?

6 A. Correct.

7 (Whereupon Mr. Michaels entered the  
8 room.)

9 MR. MARTIN: We're just going to take a  
10 break so we can change attorneys here.

11 (Whereupon Mr. Escobar exited the room.)

12 MR. MARTIN: We took a short break so  
13 that Mr. Escobar could leave. And Mr.  
14 Michaels, would you put your name on the  
15 record, please, sir.

16 MR. MICHAELS: Dino Michael, Escobar &  
17 Associates, on behalf of Curtis Reeves.

18 MR. MARTIN: Thank you, Mr. Michaels.

19 BY MR. MARTIN:

20 Q. Let's get back to the sporting clay. And I  
21 wanted to know how the shotgun, it's a semi-automatic  
22 not breech loaded, you know, where you break it open?

23 A. Yeah, you don't leave it open when you walk.  
24 You just keep your breech open on your gun and you walk  
25 but your gun is still in one piece.

1 Q. Okay. And how does Mr. Reeves carry the gun  
2 when he's walking from station to station?

3 A. I do not know.

4 Q. All right. But he does carry his own?

5 A. Correct.

6 Q. Okay. Does he place it on his shoulder, does  
7 he put it across his chest, is it muzzle up, muzzle  
8 down, how does he carry it?

9 A. I can't answer that question because it's  
10 nothing I've ever paid attention to. But if you asked  
11 me the same question I would say all of the above,  
12 depending on where I'm at.

13 Q. Okay. There is a vest that is available to put  
14 all your ammo in that some people wear. Does Mr. Reeves  
15 wear any type of vest when he does sporting clay?

16 A. No, sir.

17 Q. Does he use an ammo pouch on his belt to carry  
18 the shotgun shells?

19 A. Yes, sir.

20 Q. All right. The stages can be from 50 to 100 to  
21 150 depending on how many birds you shoot at each stage.  
22 What is the normal round count for you?

23 A. About 50 rounds. About two boxes is what we  
24 would normally carry.

25 Q. Two boxes?

1           A.     Yes, sir.

2           Q.     Okay.  Let's go to the biking.  What kind of  
3     bike does Mr. Reeves have?

4           A.     He has a road bike with the slick tires, and  
5     then he also has a mountain bike.

6           Q.     Is it a standard men's bike?  And what I'm  
7     talking about, you've seen a standard men's bike that  
8     has the tube that runs from the fork underneath the seat  
9     as opposed to now they have bikes that have a U shape,  
10    you know, configuration.  So tell me is it a regular  
11   normal with a bar like any other man's bike or used to?

12          A.     I would think so, because I don't recall for  
13   certain, but I would think so because I would think the  
14   other one was odd, and I don't remember thinking that.

15          Q.     All right.  As far as the bike with the slick  
16   tires you refer to that as a road bike?

17          A.     Yes.

18          Q.     Is that a bike with dropped handlebars?  Do you  
19   know what that is?

20          A.     I believe where you lean forward a little bit,  
21   I believe that it is, but I'm not certain.

22          Q.     You have dropped handlebars that will go out  
23   and then have a curve that goes underneath so you can  
24   actually put your hand in the curve or down in the  
25   bottom or up on top?

1 A. I do not know.

2 Q. All right. Is it a bar that goes straight  
3 across?

4 A. I do not know. I do not know what kind of  
5 handlebars are on his bike.

6 Q. As far as the road bike, how often does he ride  
7 the road bike?

8 A. We're still talking 2013?

9 Q. Yeah.

10 A. I know he went several times a week. I believe  
11 he rode it several times a week.

12 Q. Prior to January 13, 2014, when do you know was  
13 the last time that he rode it?

14 A. I have no idea.

15 Q. A week before, two weeks before, during  
16 Christmas holidays, before Christmas? I'm just trying  
17 to give you time frames to help you out.

18 A. Sure. I have no idea on that. I believe, if I  
19 was going to guess at an answer, which I know you don't  
20 want either, because he rode a couple times a week I  
21 would say that he was riding during that time frame.

22 Q. Where would he ride?

23 A. Oh, gosh, I can't think what it's called. It's  
24 a trail out by the interstate, there off of 50.

25 Q. Suncoast?

1           A.     No, not the Suncoast. His home is closer to  
2     75. Withlachoochee Trail? That sounds familiar.

3           Q.     **Okay.**

4           A.     I think that's where he lives.

5           Q.     **There's several trail heads on the**  
6     **Withlachoochee Trail, do you know which one he would go**  
7     **to?**

8           A.     I do not.

9           Q.     **That trail goes all the way up to Dunnellon.**  
10    **Did he start at Dunnellon and come south?**

11          A.     No. I think they just rode -- there must be  
12    something around 50, around Highway 50 and 75 where you  
13    can get on the Withlachoochee Trail. I think they  
14    parked -- I believe they parked there and then just rode  
15    some on the trail and then rode back.

16          Q.     **All right. Did you ever go on a bike ride with**  
17    **Mr. Reeves on the Withlachoochee Trail?**

18          A.     Not in 2013, or any time that I can recall  
19    prior to that.

20          Q.     **And you know he did these bike rides how?**  
21    **Remember we talked about personal observation, is that**  
22    **how you learned?**

23          A.     Because he said, I went on a bike ride today.

24          Q.     **Okay. Did he ever tell you how long as far as**  
25    **distance or time?**

1 A. He may have, but not that I recall.

2 Q. **Okay.**

3 A. Because it's probably something we would have  
4 talked about but I don't recall how long.

5 Q. **So as far as the road bike, Withlachoochee**  
6 **Trail, two or three times a week?**

7 A. I would think so, yes, sir.

8 Q. **And that would be in 2013 up until January 13,**  
9 **2014?**

10 A. Yes, sir.

11 Q. **As far as the mountain bike, tell me about the**  
12 **mountain bike. Do you know what kind of bike it is?**

13 A. I don't. Him and my mother got, and I don't  
14 remember exactly when they got them, but him and my  
15 mother bought mountain bikes. They did them but they  
16 got newer ones. And he only rode the mountain bike I  
17 think pretty exclusively when my mother rode.

18 Q. **Does the mountain bike have a certain type of**  
19 **tires on it? Knobby tires, or something that would**  
20 **allow to go on trails of dirt or gravel more efficiently**  
21 **than a thin, tubed tire?**

22 A. It does have a different tire on it. I don't  
23 know what kind, it does have more of a tread to it,  
24 though. But my parents don't ride -- when they ride  
25 their mountain bikes they are riding on pavement. They

1 don't ride on gravel or dirt.

2 Q. Where do they ride the mountain bikes?

3 A. I think they also rode on the trail.

4 Q. Withlacoochee?

5 A. I believe so.

6 Q. Ever go walk with your mom and dad, Mr. and  
7 Mrs. Reeves?

8 A. Yes, sir.

9 Q. You have a daughter?

10 A. I do.

11 Q. And your daughter goes along in a wagon?

12 A. Correct.

13 Q. Who pulls the wagon?

14 A. Most the time I would, but back in 2013 my dad  
15 would definitely give me a break on occasion.

16 Q. All right. So he would be pulling the wagon?

17 A. Yes.

18 Q. How often would that occur? You told me  
19 earlier about your mom and dad walking by themselves,  
20 now this is more like a family walk. How often would  
21 that occur on a monthly or weekly basis?

22 A. Maybe once a week.

23 Q. And that's since the time that you moved in?

24 A. Yes, sir.

25 Q. And again, how long as far as time and distance

1    **would those walks be?**

2           A.    It would be the same thing, it would be walking  
3 around the neighborhood, so about a mile, mile and a  
4 quarter maybe.  Maybe 45 minutes to an hour's worth of  
5 time.

6           Q.    **Is it relatively flat, some incline?**

7           A.    There's some incline.

8           Q.    **And at times Mr. Reeves would pull the wagon  
9 with your daughter in the wagon?**

10          A.    Yes, sir.

11          Q.    **How old is your daughter?**

12          A.    My daughter is three and a half now.  At the  
13 time she was a year old.

14          Q.    **A year old?**

15          A.    Yes, sir.

16          Q.    **Was she able to sit up unsupported or was there  
17 some other apparatus in the wagon?**

18          A.    No, she sat up.

19          Q.    **Okay.  She had those motor skills?**

20          A.    Yes, sir.

21          Q.    **Okay.  About how much did she weigh at the  
22 time?**

23          A.    I don't know.  I think she's 36 pounds now, I'm  
24 not sure what she weighed then.

25          Q.    **Less than 36?**



1 A. Oh, for sure.

2 Q. All right. Is there a dog in the family?

3 A. There is.

4 Q. What kind of dog?

5 A. It's my dog, she's about a 40 pound Walker  
6 Hound Mix.

7 Q. Let me ask you a little bit about your dog. Do  
8 you walk your dog?

9 A. Most the time she plays in the back yard.

10 Q. Do you go on walks with your dog?

11 A. Infrequently, yes.

12 Q. I want to talk about you personally, about how  
13 you trained your dog. As far as the dog on a lead, has  
14 it been trained to not pull?

15 A. Yes, sir.

16 Q. To heel? So it's, I'll call it well mannered  
17 on a lead?

18 A. Yes.

19 Q. It's not pulling you down the sidewalk?

20 A. No.

21 Q. Has there been occasions where you've gone on  
22 walks and the dog that has come along with Mr. Reeves  
23 and your mother?

24 A. I know that I have walked pulling the wagon  
25 with Madison in it and the dog on my own. I know I've

1 done those walks with my mother. I can not, I don't  
2 remember if my father was ever there when I had the dog  
3 with me, but I know I've taken her on walks before.

4 Q. This is going to be a little bit outside of  
5 2013 just so we can get a reference. In 2013 was Mr.  
6 Reeves involved in any type of strenuous exercise for  
7 the purpose of a health benefit? Lifting weights,  
8 cardio exercise of any type, rowing, walking, using  
9 machines? Not out on the bike or the kayak, I'm talking  
10 about either at a home, at a gym, whatever. So let's  
11 talk about 2013. Was he involved in any of those  
12 activities?

13 A. I don't believe so. Not since I've lived  
14 there, no.

15 Q. Had he ever been involved in those activities?

16 A. Yes.

17 Q. Let's go back from 2000, first 2013 to 2010,  
18 that three year period, was he involved in that type of  
19 activities then?

20 A. I know at some point in time he had a  
21 membership at the gym, at Gold's gym, but I can not tell  
22 you if it was before 2010 or after 2010.

23 Q. All right. I've got some hopefully quick  
24 questions, okay. And this is all relates to Mr. Reeves  
25 2013, all right? As far as personal hygiene, he's able

1 to dress himself?

2 A. Yes.

3 Q. Put on his own shirt?

4 A. Yes.

5 Q. Put on his own pants?

6 A. Yes.

7 Q. Put on his own shoes?

8 A. Yes.

9 Q. Tie his own shoes?

10 A. Yes.

11 Q. Tie his own tie?

12 A. Yes.

13 Q. Put on his own belt?

14 A. Yeah.

15 Q. Comb his own hair?

16 A. Yes.

17 Q. Brush his own teeth?

18 A. Yes.

19 Q. Take his showers without any type of aid?

20 A. Yes.

21 Q. We talked a little bit about yard work. Does  
22 he also maintain the car by keeping it clean, as far as  
23 vacuuming and washing?

24 A. I've seen him wash the outside of the car with  
25 a big long-handled brush, but I think my mother is the

1 one that vacuums it. I usually see her vacuum it, or  
2 hear that she vacuumed it.

3 Q. All right. As far as washing the car with the  
4 long-handle brush, was that is 2013?

5 A. I believe so, yes.

6 Q. Since the time that you've lived there you've  
7 seen him?

8 A. Yes, sir.

9 Q. How many times have you seen him washing the  
10 car with a long-handled brush?

11 A. I have no idea.

12 Q. Okay. More than once?

13 A. Probably, yes, sir.

14 Q. Does he maintain his car?

15 A. In 2013?

16 Q. Kind of like a frequency, is it once a week,  
17 once a month?

18 A. Oh, once every couple weeks. I might see him  
19 pull it out and do the front end just to get the bugs  
20 off, but the whole thing maybe once every two weeks.

21 Q. Hopefully some more quick questions. Household  
22 chores. Does he participate in any type of chores in  
23 the house? And I'm just going to go through a list so  
24 we can do it quickly. As far as doing the dishes?

25 A. Yes.

1 Q. Laundry?

2 A. On occasion.

3 Q. Vacuuming?

4 A. On occasion.

5 Q. All right. And what kind of vacuum cleaner, do  
6 they have?

7 A. They have a Dyson.

8 Q. All right. And he pushes that around?

9 A. In 2013.

10 Q. Yeah?

11 A. Yes.

12 Q. Okay. Grocery shopping?

13 A. I don't think in 2013 he did.

14 Q. All right. Does he get the groceries out of  
15 the car for your mother?

16 A. He helps her, yes.

17 Q. So he carries the groceries in?

18 A. Yes, sir.

19 Q. You've seen him do that?

20 A. Yes, sir.

21 Q. In 2013, from the time you lived there how many  
22 times have you seen that, as far as carrying the  
23 groceries in?

24 A. I don't know, I'm going to guess a handful of  
25 times. They're retired and I work, so they got all that

1 stuff done when I was wasn't there.

2 Q. That's what I need to know, personal  
3 observations. Other than going on walks with your  
4 mother, Vivian, does Mr. Reeves assist her in any way  
5 with any of her personal hygiene, dressing or anything  
6 like that?

7 A. No.

8 Q. Or is she self sufficient?

9 A. She's self sufficient.

10 Q. Okay. In 2013, up until the time of the  
11 shooting on January 13, 2014, did your father use any  
12 type of apparatus to assist him walking, such as a  
13 walker, a motorized scooter, a cane?

14 A. No, sir.

15 Q. Whatever you can think of?

16 A. No, sir.

17 Q. Okay. Up until the time of the shooting on  
18 January 13, 2014, did he use any type of apparatus to  
19 assist with his breathing?

20 A. He does sleep with a CPAP machine at night.

21 Q. Okay. But that's for sleep apnea?

22 A. That is correct.

23 Q. And the oxygen there is to allow him to sleep,  
24 he doesn't need the oxygen to walk around during the  
25 day?

1 A. No, sir.

2 Q. **Okay. That is simply a sleep aid?**

3 A. That is correct.

4 Q. **Wears glasses?**

5 A. Yes, sir.

6 Q. **Wears a hearing aid?**

7 A. No, sir.

8 Q. **I'm going to go now, change gears a little bit.**  
9 **I want to talk about Mr. Reeves again in 2013 about any**  
10 **physical ailments. And again, I've read your transcript**  
11 **of the bond hearing, but I want a little more detail**  
12 **about what you know and how you know it.**

13 A. All right.

14 Q. **And I want to concentrate on 2013. Is he**  
15 **taking any type of medicine?**

16 A. I believe so. For cholesterol and high blood  
17 pressure.

18 Q. **How do you know that?**

19 A. Because I've heard him talk about it, and I see  
20 him take his -- he has a little pill box that he keeps  
21 on the table and has his daily pills in it, and I see  
22 him, I don't know how many are in there but I see him  
23 take them daily.

24 Q. **Cholesterol and high blood pressure?**

25 A. And he also took something, I think he took, I

1 know he was taking it at the time of the incident too.  
2 I think he was taking Flomax, had something to do with  
3 urination and prostate.

4 Q. How do you know that? Not what it's for but  
5 how do you know he takes Flomax also?

6 A. Because it became an issue when he was  
7 incarcerated when he couldn't get it.

8 Q. Okay. Is he currently being treated by a  
9 doctor for his cholesterol?

10 A. He's been under the treatment of the same  
11 doctors for years, so I'm assuming for him to have a  
12 valid prescription, then yes.

13 Q. Who is that doctor?

14 A. I think his name is Dr. Yetzi, I think it's Y,  
15 starts with a Y. Y-e-t-s-i, or something like that.  
16 I'm not sure how you spell it.

17 Q. And the high blood pressure pills, do you know  
18 why he takes those?

19 A. Because he has high blood pressure.

20 Q. I know that kind of sounds obvious, but do you  
21 know why he has high blood pressure? There can be a lot  
22 of reasons for it, do you know why?

23 A. I'm pretty sure that his mother had it as well,  
24 so I don't know if he has a heredity form or because  
25 he's overweight.



1           Q.     In 2013 you indicated previously that you  
2     believed he suffers from bursitis in his shoulder. What  
3     do you know about that?

4           A.     He was doing, at some point when he was going  
5     to the gym he was taking, he was trying to do a yoga  
6     class and then he ended up with bursitis and couldn't do  
7     that any more. He couldn't put weight on his shoulder.

8           Q.     So that was prior to 2010 that he was going to  
9     the gym?

10          A.     I'm guessing that. I don't remember the time  
11     frame. I know it was prior to 2013 because since I've  
12     been there he has not gone to the gym.

13          Q.     All right. And that's the only thing you know  
14     about in as far as lifting heavy weights, he's not going  
15     to do that any more?

16          A.     Yeah, lifting heavy weights, or lifting even  
17     his own body weight, that kind of thing, yes, he  
18     couldn't do that any more.

19          Q.     Pull ups, chin ups, push ups?

20          A.     He can't do that any more. I don't think he  
21     could do it at the time, I just think he thought he  
22     could. But then going to yoga, that's why he had to  
23     quit.

24          Q.     So in 2013, because he's adjusted his  
25     lifestyle, I assume that's no longer an issue?

1           A.     The bursitis, I don't know. I'm not even,  
2     other than it being an issue with the joints, I'm not  
3     even sure exactly what it is. I know he's said since  
4     he's had that he can't do weight on that shoulder.

5           Q.     **Okay. Lifting weights like a weight lifter?**

6           A.     No, he wasn't lifting weights, I don't think,  
7     at the time.

8           Q.     **At the gym?**

9           A.     He couldn't put any weight on that shoulder.  
10    Even picking up my daughter, or picking up something  
11    really heavy, it still bothers him in the shoulder. So  
12    ever since he's had bursitis, he's had that issue where  
13    he cannot do those things since that incident.

14          Q.     **2013, as far as your belief he suffers from**  
15    **arthritis in his hands. What do you know about that,**  
16    **personal observations?**

17          A.     Personal observation, he just looks old.

18          Q.     **Okay. Let's go back to 2013.**

19          A.     He looked old in 2013 too.

20          Q.     **All right.**

21          A.     The arthritis is conversations that I've heard  
22    him and my mother have, or him and us as a family  
23    talking about the arthritis in his hands. Personal  
24    observations, they just look like old man hands. As far  
25    as, and I'm not sure this is arthritis related, but his

1 fingers locking up, that's kind of creepy looking. But  
2 I have observed where his hand locked up and his fingers  
3 will not straighten out or move.

4 Q. **Is this in 2013?**

5 A. Yes, I saw it then and I've seen it recently.

6 Q. **Is this a temporary condition when it locks up?**

7 **How does it resolve itself?**

8 A. He just waits and it will eventually come  
9 undone. My mother kind of has the same thing, but hers  
10 usually only last just a very short period of time, a  
11 few minutes. I think dad's issues are a little bit  
12 longer than that, but I don't know the time frame.

13 Q. **Sciatic nerve?**

14 A. I know he had trouble with that all through  
15 growing up and that kind of thing, I don't know how that  
16 effects him now.

17 Q. **2013?**

18 A. I don't know.

19 Q. **How it effected him or even if it does?**

20 A. Yeah, I don't know.

21 Q. **The floaters in his eyes, tell me about that.**

22 A. I just, again, not knowing clinically what  
23 floaters actually are, knowing that it's something that  
24 can be in your eye and obstruct your view. I know that  
25 he deals with that as well.

1 Q. He wears eyeglasses?

2 A. He does.

3 Q. And he still in 2013 he drove during the day  
4 and he drove during the night?

5 A. Correct.

6 Q. And in 2013 he was sporting clay shooting?

7 A. Correct.

8 Q. Hit the birds?

9 A. Sometimes.

10 Q. If not by luck, sometimes by skill?

11 A. Most the time by skill, sometimes by luck.

12 Q. There you go. Okay. I want to show you some  
13 pictures, we're going to number these one through seven.

14 (Whereupon the documents were marked.)

15 BY MR. MARTIN:

16 Q. Photograph number one, do you recognize the  
17 gentleman in the photograph?

18 A. I mean, the photo is not completely clear as  
19 far as facial features, but his build and that it looks  
20 like my father, yes.

21 Q. You know your father?

22 A. Yes.

23 Q. You can pick him out in a crowd from behind,  
24 side, back, right?

25 A. Yes, but the face on this is obscured.

1           Q.    **Is there any doubt in your mind that's not your**  
2 **father?**

3           A.    Because I know of the incident, no.

4           Q.    **That is your father?**

5           A.    I'm assuming.

6           Q.    **I'm asking you, you know that's your father,**  
7 **don't you?**

8           A.    Because of the build and everything else, I  
9 would say it's my father. But the face on this picture  
10 is obscured and not clear. So, I mean, could I say,  
11 yeah, that's my dad, or did you pose someone up there to  
12 be my dad, I don't know. It looks like my father.

13          Q.    **Thank you.**

14          A.    But the face is obscured.

15          Q.    **All right. Let me show you photograph number**  
16 **two. Do you recognize your father in that photograph?**

17          A.    It also looks like my father, again the face is  
18 obscured.

19          Q.    **All right. And that's the photograph of him**  
20 **walking into Cobb Theater, do you recognize that?**

21          A.    He's walking into a door I don't recognize, I  
22 mean, I don't know the carpet. If you showed this to me  
23 outside of this incident I wouldn't know where he was.

24          Q.    **And the way that you see your father depicted**  
25 **in that photograph is that representative of how he**

1 carried himself and walked, his gait? I know it not a  
2 movie, but is that representative of your father on  
3 January 13, 2014 as far as you know?

4 A. As far as I know, yes.

5 Q. Okay. Let me show you photograph number three,  
6 do you recognize your mother and your father in that  
7 photograph?

8 A. From the back, without seeing their faces, it  
9 does appear to be my parents.

10 Q. Again, does the photograph of your mother and  
11 father fairly represent their, and again, it's a still  
12 photo, it's not a video, but the way they carried  
13 themselves as far as their posture and their gait and  
14 their stance?

15 A. Yes.

16 Q. Okay. I'm going to show you photograph number  
17 four, do you recognize your mother and father in that  
18 photograph?

19 A. They are really blurry, but it does appear to  
20 be them, yes.

21 Q. Same question, do those photographs seem to  
22 fairly and accurately represent how they carry  
23 themselves, posture, gait, stance, on January 13, 2014?

24 A. Yes.

25 Q. This is a black and white photo, photograph

1 number five, off of an infrared camera. I'm going to  
2 ask you again, based on your life experience with your  
3 mother and father does that photograph depict your  
4 mother and father?

5 A. It appears to, yes.

6 Q. Same questions as far as posture, gait, stance,  
7 the way they carry themselves?

8 A. Yes, sir.

9 Q. Is that accurate for January 13, 2014?

10 A. Yes, sir.

11 Q. Photograph number six, again is an infrared  
12 shot, it's in black and white. And based on your life  
13 experience with Mr. Reeves, your father, do you  
14 recognize your father in that photograph?

15 A. The photograph is really just showing a shadow  
16 of a person because you can't depict anything, but it  
17 appears that it's of his stature and bald head.

18 Q. Photograph number seven we're back to the color  
19 photos, and based on your life experience with your  
20 mother and father do you recognize your mother and  
21 father in that photograph?

22 A. That appears to be them.

23 Q. Same questions, is that representative of their  
24 stance, their gait, the way they told themselves, their  
25 posture when they are walking?

1 A. Yes, sir.

2 Q. I want to talk about 2013, Mr. Reeves driving  
3 his vehicle. We've already touched upon that a little  
4 bit so we'll kind of go through this quickly.

5 The type of vehicle that Mr. Reeves drives?

6 A. A 2013 Ford Explorer.

7 Q. And is that an SUV?

8 A. Yes, sir.

9 Q. Would that be his vehicle, the one he drives?

10 A. Yes, sir.

11 Q. All right. And Vivian Reeves, what kind of  
12 vehicle does she have?

13 A. Oh, I think she had an Honda Accord.

14 Q. When Mr. Reeves and his wife would go out would  
15 they take the Ford Explorer or the Honda?

16 A. Honda Accord. Either one.

17 Q. Did they have both of those vehicles in 2013  
18 when you were living there?

19 A. Yes, sir, they did.

20 Q. You still live there, right?

21 A. Yes, sir.

22 Q. All right. Mr. Reeves have any trouble getting  
23 in and out of the Ford SUV?

24 A. Not that I observed.

25 Q. Was there any type of mechanical apparatus to



1 aid in his driving of that vehicle?

2 A. No, sir.

3 Q. Is it -- would it be the routine or habit of  
4 Mr. Reeves that if he was going some place in his  
5 vehicle and someone else was going along with him that  
6 he would be driving? He likes to drive, he's a driver?

7 A. Not necessarily, because if he went somewhere  
8 with friends they would just swing by and pick him up or  
9 something. If him and my mother went together I would  
10 say the majority of the time he drove.

11 Q. Let me rephrase that. When it's his vehicle?

12 A. Oh, yes.

13 Q. He would be the driver?

14 A. For the most part, yes.

15 Q. Absent a trip or something maybe they switch  
16 drivers, but he is the dominant driver when he's going  
17 along in his vehicle?

18 A. Yes, sir.

19 Q. Okay. No disabled parking sticker on either of  
20 the vehicles?

21 A. No.

22 Q. I want to talk a little bit about firearms in  
23 the family?

24 A. Okay.

25 Q. We have already talked about the shotgun.

1 A. (Nodding head)

2 Q. So we're going to kind of set that aside.

3 First I want to talk about your firearms. Do you own a  
4 firearm?

5 A. I do.

6 Q. Okay. And what kind of firearm do you own?

7 A. Oh, I knew you were going to ask that. I think  
8 it's a .38 revolver, and so I have that, and my father  
9 has given me a shotgun, and a .22 rifle.

10 Q. Okay. We're going to kind of not talk about  
11 the shotgun or the .22 rifle, let's talk about the  
12 revolver. Is that something that you purchased?

13 A. No, sir. That's something that my father gave  
14 me years ago.

15 Q. And do you have a carrying a concealed weapon  
16 permit?

17 A. I do not.

18 Q. Do you carry the gun at all?

19 A. I do not.

20 Q. I know it's not in the home as we speak but in  
21 2013 did you have the revolver in the Reeves home?

22 A. I did.

23 Q. Okay. While you were there did you ever take  
24 it out of the Reeves home, and we're not talking about  
25 any type of range time, but to keep in your car?

1 A. No, sir. I've never shot it either.

2 Q. All right, let's talk about your father then.  
3 Does he own any firearms?

4 A. Yes, sir.

5 Q. Let's stay away from the shotguns and rifles,  
6 I'm not concerned about that.

7 A. Yes, sir.

8 Q. What does he own?

9 A. I have no idea. I know that he owns weapons.  
10 You know, it's one of those things now as an adult I  
11 wish I would have paid attention when I was younger so I  
12 knew more about them, but I do not. So I couldn't tell  
13 them apart.

14 Q. Okay. Have you ever seen the handguns?

15 A. Yes.

16 Q. Do you know the difference between a revolver  
17 and a pistol?

18 A. I do.

19 Q. Were Mr. Reeves' handguns revolvers or pistols  
20 or both?

21 A. Both.

22 Q. I'm going to concentrate on 2013. Did you ever  
23 go to a pistol range to shoot the firearms with your  
24 father, Mr. Reeves?

25 A. No, sir.

1           Q.     In 2013 did he ever go to a pistol range to  
2 shoot any of his handguns, whether it be a pistol or a  
3 revolver?

4           A.     It's my understanding he did.

5           Q.     And how often would he go to the shooting range  
6 to shoot his pistol or revolver?

7           A.     I don't know. My mom and him went on occasion.

8           Q.     Do you know what range they went to?

9           A.     I do not.

10          Q.     Was it an indoor or outdoor?

11          A.     I believe it was an indoor.

12          Q.     Does Shooting World sound familiar to you?

13          A.     That would sound familiar to me for a million  
14 reasons.

15          Q.     Okay. Shoot Straight?

16          A.     Both of them are completely familiar to me  
17 because of who my friends are, who I grew up around, and  
18 my lifestyle.

19          Q.     Shooting World is on Fletcher, Fowler? I  
20 always get those two mixed up.

21          A.     I think he's been there before but I don't know  
22 if that's the one he shot at.

23          Q.     As far as the pistol, do you know what kind of  
24 pistol it was? Let me ask you this, as far as caliber,  
25 .45, 9, .22, .380, do you know?

1 A. What he owned?

2 Q. **Caliber?**

3 A. I do not. I do not. I've heard all of those  
4 terms, I do not know what he owns.

5 Q. **All right. The pistol you're aware has a**  
6 **magazine?**

7 A. Oh, yes.

8 Q. **Have you ever been with your father, Mr.**  
9 **Reeves, when he loaded ammunition into the magazine of**  
10 **any of his pistols?**

11 A. I remember that as child, I do not remember  
12 that in 2013 or anywhere around there.

13 Q. **Fair enough. Do you know of any accessories**  
14 **that Mr. Reeves owns? And let me just run some off and**  
15 **we'll make this quick. Ear protection?**

16 A. Yes.

17 Q. **Eye protection?**

18 A. Yes.

19 Q. **Targets?**

20 A. I don't know that he has any.

21 Q. **Okay. Ammunition?**

22 A. Yes.

23 Q. **Do you know if it's factory or reload?**

24 A. I never heard him talking about doing reloads  
25 so I'm going to assume factory.

1 Q. Have you seen any ammunition at his residence  
2 since 2013?

3 A. No.

4 Q. Okay. Do you know how much ammunition he keeps  
5 on hand?

6 A. I do not.

7 Q. Do you know the type of ammunition?

8 A. I do not.

9 Q. Do you know if the ammunition is for target or  
10 for self defense?

11 A. His ammunition would be for both.

12 Q. Okay. Have you ever handled a pistol?

13 A. Yes.

14 Q. Have you have ever shot a pistol?

15 A. Yes.

16 Q. Have you shot a pistol shark slide lock?

17 A. Like a Glock or something like that? I don't  
18 know what that is.

19 Q. You may have misunderstood, and that's okay.  
20 So we're going to start over. Have you shot a pistol?

21 A. Yes.

22 Q. And in shooting the pistol have you shot the  
23 pistol until the slide locked in place and there's no  
24 more bullets?

25 A. Not that I recall.

1 Q. It's called a slide lock?

2 A. Yeah. Not that I recall.

3 Q. When you -- did you load the pistol yourself or  
4 did someone load it for you?

5 A. I have not shot a handgun in 20 years.

6 Q. Okay.

7 A. Rifles and shotguns, yes, I have not shot a  
8 handgun in 20 years, pistol or revolver. I do not  
9 remember who loaded it or where I shot it at.

10 Q. Got it. Okay, we're going to move on. There's  
11 an area of the law that's called by the public stand  
12 your ground law. Basically it's a type of self defense  
13 that has drawn some attention to the media in Florida  
14 over the last couple of years. Have you ever had any  
15 discussion with your father at any time prior to January  
16 13th about his understanding of the "stand your ground  
17 law"?

18 A. Not that I can recall.

19 Q. Any time during the Trayvon Martin incident,  
20 Zimmerman trial, anything in the media where there would  
21 be some reference by the media stand your ground and  
22 your father would comment on it and give some  
23 observation based on his life experience?

24 A. I remember hearing all about the trial, and it  
25 being saturated in the news, but I don't remember

1 discussing it with my family or hearing anything.

2 Q. Same question as far as Matt, your brother, any  
3 discussions like that?

4 A. No, sir.

5 Q. Have you had any discussions with Mr. Reeves  
6 regarding the use of firearms, under what circumstances  
7 in self defense prior to the shooting January 13, 2014?

8 A. I know as a kid I remember dad, he taught  
9 firearm safety, and he taught firearms, and he taught  
10 the concealed classes. He did all of those things. So  
11 growing up in the household they weren't a mystery to  
12 us. So it was never we sat down and had a conversation  
13 about a gun or something like that.

14 I can't recall him -- I'm going to assume that  
15 he taught us firearm safety because we shot with him and  
16 all that, but I do not recall a conversation or a  
17 particular incident where we sat down and had a  
18 conversation.

19 Q. Okay. Now topic. There was a hunting trip  
20 that your father went on just prior to the shooting with  
21 your brother Matthew. That's what I want to talk about.

22 A. Okay.

23 Q. Are you aware of that hunting trip?

24 A. Yes.

25 Q. It's my understanding that Mr. Reeves got back



1 the day before the shooting on January 13th, am I  
2 correct?

3 A. I don't remember when -- I didn't even remember  
4 if the trip was in the fall or after Christmas until you  
5 just said that.

6 Q. But you do remember the last trip that he and  
7 Matt went on before the shooting?

8 A. Correct.

9 Q. Okay. And do you know where they went?

10 A. I think that might have been to Ohio. I could  
11 be wrong on that one, but I think that's where they were  
12 going to.

13 Q. And as you indicated, prior to that trip did  
14 Mr. Reeves participate in practicing his archery skills  
15 with one of his bows, whichever one it was, in the back  
16 yard?

17 A. I heard that he did, but I don't remember  
18 seeing him out there practicing.

19 Q. Did you have any discussions with your father  
20 about going on that trip prior to him leaving?

21 A. No, sir. I know he was looking forward to  
22 spending time with my brother.

23 Q. All right. Did you observe any of the practice  
24 sessions in the back yard as far as him using either of  
25 the bows --

1 A. No, sir.

2 Q. -- for practice? Did he make any statements to  
3 you about how well the practice went, how many times he  
4 shot, I'm looking good this year, I'm not going to be  
5 good this year?

6 A. No.

7 Q. Anything like that?

8 A. He did not, but my mother did. My mother  
9 talked to me and said what a hard time he was having and  
10 that he had really looked forward to spending time with  
11 Matt but he wasn't sure if he was going to be able to  
12 draw his bow back, but he didn't want us to know.

13 Q. I'll discuss that with your mother. How long  
14 was the trip in days?

15 A. I'm not sure. I don't remember.

16 Q. And what type of game was being sought?

17 A. Deer.

18 Q. And do you know the tract of land that they  
19 went to in Ohio?

20 A. I do not.

21 Q. Okay. Do you know the terrain elevation or  
22 anything like that?

23 A. No, sir. I'm not familiar with that area.

24 Q. All right. Do you know the type of hunting  
25 that they would be doing? And here's where I'm going

1 with this, do they take along tree stands, and get up in  
2 a tree and throw corn down on the ground or they trudge  
3 through the woods and stalk them and find them and shoot  
4 them? See, there's two different ways.

5 A. Sure.

6 Q. I'm trying to figure out which one?

7 A. I think my dad's tree stand days were over long  
8 ago. I think he hunted from a ground blind, but he  
9 wasn't a walk through the woods stalker. He would wait.  
10 Or he had set up a ground blind and do it that way. So  
11 I believe that's what's he was doing.

12 Q. Ground blind?

13 A. Yes, sir. Now for my brother, he could go  
14 either way.

15 Q. Do you know which bow he took?

16 A. I do not. I think, you know what, I don't know  
17 but I remember them saying that he backed the pressure  
18 off of it, so it had to be his compound bow because I  
19 don't think you can do that on a recurve.

20 Q. A compound bow, back the pressure off, do you  
21 know if he was able to acquire any game, shoot any deer?

22 A. I don't think he did, but I don't remember if  
23 my brother did or not.

24 Q. Okay. Did you have any discussion with your  
25 father as far as once the game was harvested as far as

1 **dressing the game or getting the game out of the woods?**

2 A. No, sir.

3 Q. **You do know that takes place?**

4 A. Oh, yes.

5 Q. **Okay. Does your father know how to field dress**  
6 **a deer?**

7 A. I would assume so. He's hunted a good portion  
8 of his life.

9 Q. **Does he have the equipment to field dress a**  
10 **deer?**

11 A. I don't know. I would assume that if you were  
12 going hunting and hoping to kill something you would  
13 probably have that.

14 Q. **The reason I ask, Matthew could have it or your**  
15 **father could have it?**

16 A. Oh, Matt would have it. I don't know about my  
17 father but my brother would have it.

18 Q. **Have you ever, and this is one of those overall**  
19 **questions, have you ever been present when Mr. Reeves**  
20 **field dressed a deer?**

21 A. I have been present when, I don't know if it  
22 was dad though, I would say no.

23 Q. **Okay. Another topic, okay?**

24 A. Okay.

25 Q. **There was some ammunition that was found in the**

1 vehicle on January 13. There was a box, full box, 50  
2 rounds, were you aware that your father kept a 50 round  
3 count box of ammo in his car?

4 A. No. It wouldn't be uncommon, especially if he  
5 went to the range to shoot.

6 Q. I understand. But we're at a movie theatre,  
7 that's why I'm asking. Do you know if it's always  
8 there?

9 A. I have no idea. I didn't know it was there  
10 until you just told me.

11 Q. All right. Next topic. I want to talk a  
12 little bit about your dad because during the bond  
13 hearing you did make some statements in response to  
14 questions asked you about your dad's personality.

15 A. Okay.

16 Q. So I just want to touch briefly on that. Your  
17 father was a police officer with Tampa Police  
18 Department?

19 A. Yes, sir.

20 Q. And your life experience you know he rose  
21 through the ranks to the position of captain?

22 A. Yes, sir.

23 Q. And prior to captain was he a lieutenant? I  
24 don't know how they do it over there.

25 A. I believe so.

1 Q. And then prior to that a sergeant?

2 A. Yes, sir. And prior to that a corporal.

3 Q. Corporal, Sergeant, Lieutenant, and Captain are  
4 all supervisory roles?

5 A. Correct.

6 Q. And then when he retired from the Tampa Police  
7 Department he went to Busch Gardens?

8 A. Correct.

9 Q. Again was in a position of authority at Busch  
10 Gardens?

11 A. Yes, sir. Director of Security.

12 Q. Director of Security. You mentioned during the  
13 bond hearing two incidents that you gave as examples of  
14 your father's personality. One dealing with corporal  
15 punishment as a child, and one with some type of  
16 accident in North Carolina where a rack on a back of a  
17 vehicle was damaged?

18 A. Yes.

19 Q. I already know what you said, I just want to do  
20 some follow up. As far as your father's demeanor and  
21 personality since it was brought up at the bond hearing.

22 A. Okay.

23 Q. How would you describe your father's  
24 personality?

25 A. I'm just like my father. I would say that my

1 father is a direct person as far as getting his point  
2 across. I would say that he is a very caring person, he  
3 does for others. My father believes in, and raised my  
4 brother and I to be respectful, productive members of  
5 society, and responsible.

6 Q. It has been described in various evaluations  
7 with Tampa Police Department that your father has a  
8 forceful personality, which serves his well as a police  
9 officer. Would you agree with that, that he has a  
10 forceful personality?

11 A. I'm not sure what that means.

12 Q. In relation to law enforcement work, and that's  
13 the contents of the reference, you mention direct, get  
14 to the point, direct to the point. So as a law  
15 enforcement officer you have the authority, you have the  
16 badge, you have the gun, when you tell someone to do  
17 something they do it, because they respect the law, the  
18 badge, and the gun, right? I mean, police officers have  
19 the authority to tell people what to do, right?

20 A. Yes.

21 Q. And as a police officer, when you're working as  
22 a police officer and you have that authority, if it's a  
23 lawful request by a police officer and the person  
24 doesn't do a lawful request by a police officer then  
25 there could be consequences or repercussions all the way

1 up to arrest?

2 A. Correct.

3 Q. And that is the life that your father led for  
4 over 30 years, both at Tampa P.D. and at Busch Gardens  
5 in his position of authority where he did have command  
6 over people based on his position, and if they didn't  
7 obey him there would be consequences, correct?

8 A. I would assume so, yes.

9 Q. As a police officer?

10 A. Sure. My father was in a position of authority  
11 because he's a phenomenal leader.

12 Q. I didn't ask you about that.

13 A. And he's always been a very fair person too.

14 Q. I understand that. We're talking about the job  
15 itself and the authority people possess as a police  
16 officer, okay? That's what we are talking about. Now,  
17 having that life experience, your father, after he  
18 retired from those two positions did he have the same  
19 type of, and I'm going to refer to forceful personality  
20 that his peers and supervisors noted in his evaluations,  
21 after he retired from those two positions?

22 MR. MICHAELS: Objection. Speculation,  
23 calls for an answer regarding a term that she  
24 already said that she's unfamiliar with. You  
25 can answer it.



1       **BY MR. MARTIN:**

2           Q.     **Do you understand the question?**

3           A.     I believe I understand what you're saying, but  
4     you're asking me to use a term that police officers use,  
5     that's not a term that I would use.

6           Q.     **You used direct and to the point?**

7           A.     Correct.

8           Q.     **All right. Let's stick with that then. After**  
9     **he retired was your father still direct and to the**  
10    **point?**

11          A.     Yeah. That's who he is.

12          Q.     **And when he asks someone to do something,**  
13    **because he is direct and to the point he would want them**  
14    **to do that?**

15          A.     My father understands the difference between a  
16    professional and a career work experience and a home  
17    life. And when he was retired he understood the  
18    difference between that.

19          Q.     **And how do you know that?**

20          A.     Because that's not -- at work or in a  
21    deposition you are forceful and direct with me, but you  
22    are not that way at home with your family. Or you may  
23    be that way, so that's what I mean by that situation.  
24    You are not the same person at home or at work in a  
25    position of authority that you are with your family and

1 at home and friends, even still that you hold that  
2 position of authority.

3 Q. And how do you know that applies to Mr. Reeves?

4 A. Because he's in the father.

5 Q. Okay. And at home when he gives directions to  
6 people, to either you or to Matthew, does he expect you  
7 to follow those directions?

8 A. He doesn't give us directions. I mean  
9 directions in the sense that direction as far as advice  
10 and guidance, but he's not telling us what to do.

11 Q. Did your father struggle in any way with  
12 retirement? And I'm going to say that sentence and then  
13 this is what I mean, as an example, the phenomenon when  
14 a person in the military where there is that structure  
15 whether you're in combat or whatever, and all of a  
16 sudden you are no longer in combat and you come back  
17 home, and you're still dealing with the emotions of that  
18 combat. Take that to the police officer, because that  
19 is quasi military, and you deal with a lot of unsavory  
20 things. Did Mr. Reeves struggle when he came to full  
21 retirement, when he was no longer in a position of  
22 authority over people where he could no longer tell  
23 people what to do. Did he struggle with that loss of  
24 authority?

25 A. No, not at all.

1 Q. Why did you say that?

2 A. Because he was always grounded with his family  
3 and friends and church throughout his entire career.  
4 Unlike the military where you go off and be separated  
5 from everyone, and encounter things. He came home every  
6 day to his family and his wife and his kid. So he was  
7 never fully immersed in a situation that you describe,  
8 to where he was ever not in touch with reality and  
9 family life and home and church and friends. So, no.

10 Q. You gave some examples in the bond hearing  
11 regarding his demeanor in situations out in public.  
12 Have you observed any type of change in his demeanor  
13 where because of lack of control he becomes frustrated  
14 with the event that he's in?

15 A. No.

16 Q. And exhibits that in some way?

17 A. No.

18 Q. He's easy, he's calm, he's easy to get along  
19 with, is that what you're telling me?

20 A. Yes. I'm not saying he never gets frustrated,  
21 we all do, but he's never, the outburst that you  
22 described, no.

23 Q. I'm talking about Mr. Reeves, not that we all  
24 do, okay?

25 A. Hm-mm.

1 Q. Last topic. As far as any interviews that  
2 you've done up until today, have you provided any type  
3 of tape recorded statement to anyone regarding your  
4 potential testimony in this case?

5 A. No, sir.

6 Q. Have you discussed with anyone regarding your  
7 potential testimony in this case? Do you know why you  
8 were listed as a witness?

9 A. Not necessarily why, no.

10 Q. Have you been shown or provided any documents  
11 to review, police reports, photographs, videos,  
12 surveillance videos?

13 A. No, sir. I've seen stuff on TV, but that's it.

14 Q. Absent what's been in the media, the public,  
15 have you reviewed the surveillance tape of the shooting  
16 on January 13th?

17 A. I saw it at the bond hearing.

18 Q. Okay. Other than at the bond hearing?

19 A. No, sir.

20 Q. Have you read any police reports?

21 A. No, sir.

22 Q. Have you been interviewed by any of the defense  
23 experts in this case? Vonnard, V-o-n-n-a-r-d, Adams?

24 A. No.

25 Q. He's like a pathologist, medical examiner, ever

1     **talked to him?**

2           A.     No.

3           Q.     **Michel Foley, he's a radiologist, Dr. Michael**  
4     **Foley, ever talk to him?**

5           A.     No, sir.

6           Q.     **Mike Knox?**

7           A.     No, sir.

8           Q.     **Phillip Hayden. Dr. Phillip Hayden?**

9           A.     No, sir.

10          Q.     **Okay. Have you viewed any of the photographs**  
11     **that were taken in this particular case?**

12          A.     Other than the ones you just showed me, no.

13                   MR. MARTIN: I have no further  
14                   questions, thank you.

15          A.     Thank you.

16                   MR. MICHAELS: I have a couple  
17                   questions.

18                   CROSS EXAMINATION

19           **BY MR. MICHAELS:**

20          Q.     **Let me ask you, you talked about bursitis, is**  
21     **that in your father's shoulder or where?**

22          A.     I think it was in his shoulder, but I'm not  
23     even sure. The way he's talked about it I'm not sure if  
24     bursitis is something you get and then it goes away or  
25     if you get it and, you know, it's like a permanent

1    ailment, like arthritis or something like that. I don't  
2    even know if that's what it is. I know my understanding  
3    of that, since he's had bursitis, again, I don't know if  
4    it came and went, or if it comes and stays, that he has  
5    been unable to have a full range of motion or even put  
6    much weight on that shoulder.

7            Q.    **You're holding your left shoulder, is that the**  
8    **shoulder you think it is?**

9            A.    I think it's his left, but I'm not certain.

10          Q.    **But you're certain that he has problems picking**  
11 **up your child because of that?**

12          A.    Sure.

13          Q.    **And how do you know that?**

14          A.    I've watched it. A lot of times he just  
15 doesn't pick her up.

16          Q.    **You talked a little bit about your father**  
17 **riding his bike. Do you know why he took up bike**  
18 **riding, cycling?**

19          A.    Yes, sir.

20          Q.    **Why?**

21          A.    When he retired from the police department he  
22 saw so many of his friends just kind of go down hill  
23 pretty quick, and he was determined not to do that. And  
24 the reason he took up cycling is because it doesn't have  
25 the impact like running or walking or weight bearing

1 exercise has on your body. So I think that was the big  
2 reason for doing cycling is the aerobic activity but not  
3 having that, gosh, I can't think of the right word. The  
4 impact on your body, it has less impact on your body.

5 Q. **And so he wasn't able to run?**

6 A. Oh, no. He hasn't been able to run for years.  
7 That was sciatic nerve and back issues and all kinds of  
8 stuff. No, he hasn't run for years.

9 Q. **So in 2013 he definitely couldn't run?**

10 A. No.

11 Q. **Could he walk long distances?**

12 A. I don't know if he could walk long distances,  
13 but he can walk around the neighborhood.

14 A. Okay.

15 Q. **Now, you said your father is a direct person,**  
16 **right?**

17 A. Yes, sir.

18 Q. **When he -- growing up did he treat you kind of**  
19 **the way you would imagine that a police officer treats a**  
20 **suspect or did he treat you more like a father who cares**  
21 **and loves somebody, giving direction?**

22 A. No, a father with his children.

23 Q. **Okay.**

24 MR. MICHAELS: That's all I have, I  
25 don't have anything else.

1 MR. MARTIN: No questions.

2 A. Thank you.

3 MR. MICHAELS: She'll waive.

4 (Whereupon the taking of this deposition  
5 was concluded at 11:11 a.m. and reading and  
6 signing were waived.)

7 \*\*\*\*\*

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CERTIFICATE OF OATH

STATE OF FLORIDA :

COUNTY OF PINELLAS :

I, the undersigned authority, certify that  
Jennifer Shaw personally appeared before me and was duly  
sworn.

WITNESS my hand and official seal this date:  
November 27, 2015.



KayLynn Boyer  
Court Reporter  
Notary Public  
State of Florida



CERTIFICATE OF REPORTER

STATE OF FLORIDA :

COUNTY OF PINELLAS :

I, KayLynn Boyer, certify that I was authorized to and did stenographically report the foregoing deposition of Jennifer Shaw, and that the transcript is a true record of the testimony given by the witness.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

Dated: November 27, 2015.



KayLynn Boyer  
Court Reporter

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