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IN THE CIRCUIT COURT
OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

CRIMINAL DIVISION

CASE NO.: 18-10885-CF

SPECIAL PROSECUTION

STATE OF FLORIDA,)
)
 Plaintiff,)
 vs.)
)
CHARISSE STINSON,)
)
 Defendant.)
-----/

DEPOSITION

OF

LINDA L. HART

TAKEN BY: The Defendant
DATE: Tuesday, February 4, 2020
TIME: 3:42 p.m. - 3:54 p.m.
PLACE: County Justice Center
 14250 49th Street North
 Clearwater, Florida 33762

Reported By: Gina M. Manning
 Court Reporter, Notary Public
 State of Florida at Large

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A P P E A R A N C E S

APPEARING ON BEHALF OF THE PLAINTIFF:

PAUL BOLAN, ESQUIRE
County Justice Center
Office of the Public Defender
14250 49th Street North
Clearwater, Florida 33762
Phone: 727-464-6516

APPEARING ON BEHALF OF THE DEFENDANT:

ALLISON MILLER, ESQUIRE
LORI MAHIN, ESQUIRE
County Justice Center
Office of the State Attorney
14250 49th Street North
Clearwater, Florida 33762
Phone: 727-464-6221

I N D E X

WITNESS

LINDA L. HART

DIRECT EXAMINATION PAGES

By Ms. Miller 4-11

DIRECT EXAMINATION PAGES

By Ms. Mahin 12-15

CROSS EXAMINATION PAGES

By Mr. Bolan 15-16

EXHIBITS

No exhibits.

P R O C E E D I N G S

1
2 Thereupon,

3 LINDA L. HART

4 was called as a witness by the DEFENDANT and having first
5 been duly sworn by the court reporter was examined and
6 testified on her oath as follows:

D I R E C T E X A M I N A T I O N

7
8 BY MS. MILLER:

9 Q. If you could please say your first and last name
10 and spell your last name.

11 A. Linda Hart, H-A-R-T.

12 Q. We're here today on the State of Florida versus
13 Charisse Stinson. Do you remember being involved which
14 investigation?

15 A. I found a blanket.

16 Q. Tell me what happened.

17 A. I had been talking to some ladies at the Memorial
18 and when I left, I was like looking. As I was driving,
19 I was just looking and it was in the curb like just laying
20 in the curb.

21 Q. When you talk about being at the Memorial, for
22 Jordan Belliveau?

23 A. Yes.

24 Q. Did you know Jordan or his family when he was
25 alive?

- 1 A. The great-grandmother had family living next to me,
2 but I didn't know they were related in the beginning.
- 3 Q. Who is the great-grandmother?
- 4 A. Thelma.
- 5 Q. Is that Jessica's mother?
- 6 A. No.
- 7 Q. Who is Thelma?
- 8 A. Joe's. On Joe's side.
- 9 Q. The way you speak of them, it sounds like you
10 know them.
- 11 A. They live -- Well, she was always next door with
12 the family.
- 13 Q. Thelma?
- 14 A. Yeah. I know only know her, I don't know anybody
15 else in that family.
- 16 Q. What inspired you to go to the Memorial?
- 17 A. I take pictures for ION Tampa Bay. I'm actually
18 news. It's like "why are you following me"? I'm news.
- 19 Q. So you are hired as a contract photographer for a
20 website called "I Own Tampa Bay" [sic]?
- 21 A. IONTB.
- 22 Q. IONTB.com?
- 23 A. Yes.
- 24 Q. Is that a website?
- 25 A. Yes.

1 Q. And you were hired by that website to take
2 pictures?

3 A. We volunteer. There's three of us.

4 Q. As photographers?

5 A. Yes.

6 Q. Why do you volunteer to take pictures for this
7 website?

8 A. Why? I don't know. I can't answer that.
9 Excitement. No. I do action sports type stuff, and then
10 this just kind of happened. I just kind of happened to know
11 him over the years, so... I just kind of fell into it.

12 Q. Did someone from the website ask you to go to
13 Jordan Belliveau's Memorial?

14 A. We all had been watching the story unfold, all
15 three of us.

16 Q. The other photographers?

17 A. Well the news man and then the other photographer,
18 Zach. We are always in contact with each other.

19 Q. So did someone ask you to go to the Memorial, or
20 did you just decide to go on your own?

21 A. I don't remember because we just always --
22 Somebody says that news was breaking we go.

23 Q. And then at the Memorial --

24 A. It was after the arrest because I was there for the
25 arrest. I was there before -- I'd actually walked the park

1 over on the other side.

2 Q. Which park? Largo Central?

3 A. Largo Central Preserve.

4 Q. Looking for Jordan?

5 A. Yeah. That day.

6 Q. What do you mean you were there for the arrest?

7 A. When -- When -- When -- When they had found him and
8 then she was there, I suppose. I guess she was there and so
9 I just stayed and, you know, they did a news press
10 conference and all that.

11 Q. Did you actually see Ms. Stinson get arrested?

12 A. I didn't actually see her but I heard.

13 Q. Who did you hear from?

14 A. Let's see. I don't know their names. There were
15 a lot of people still there. It was a big crowd.

16 Q. So when Baby Jordan was found --

17 A. -- there was a big crowd.

18 Q. I understand.

19 Were you there when his body was found?

20 A. (Deponent moves head up and down.)

21 Q. Is that a "yes"?

22 A. Yes.

23 Q. Like you saw his body?

24 A. No, no, no, no.

25 Q. So I don't understand. Where were you?

1 A. There was a whole -- Okay. Lake. Everybody was on
2 Lake, Lake Avenue. So there was like probably, I would say
3 200, 300 people.

4 Q. Doing what?

5 A. Waiting for confirmation.

6 Q. And were you taking pictures?

7 A. Yeah.

8 Q. So would you say you were there in a professional
9 capacity?

10 A. Yeah.

11 Q. And then you went to the press conference that the
12 Largo police department had?

13 A. I was there but I was not up... They wanted press
14 credentials and I didn't have any with me so...

15 Q. Do you have press credentials?

16 A. No. I'm just the photographer, so...

17 Q. So when you say that you were there, where were you
18 for the press conference?

19 A. The side of the lake, way... They had us on Lake,
20 and they were up by that church. There's like a, not
21 a church. Yeah, it's a church on the corner.

22 Q. So you were one of the spectators on Lake --

23 A. Yeah.

24 Q. -- both at the time that Jordan's body was found --

25 A. Yeah.

1 Q. -- and when Ms. Stinson was arrested --

2 A. Yeah.

3 Q. -- but you didn't witness either of those things?

4 A. Uh-uh.

5 Q. Is that a "no"?

6 A. That's a no.

7 Q. Did you ever write in your handwriting a statement
8 about the blanket?

9 A. No.

10 Q. I'm going to read to you the police report that
11 references it just to make sure that it's accurate.
12 If I say "I", it's the police officer.

13 "I was contacted by a park worker at
14 1336"--that's the time--"when a dirty child's
15 blanket was located by a civilian Lake Avenue South
16 on the entrance to the sports complex. This parks
17 worker drove me to the area on his golf cart and
18 I met with Linda Hart, 1-19-62, who located the
19 blanket and flagged down the parks worker".

20 Is that correct?

21 A. Uh-huh.

22 Q. Is that a "yes"?

23 A. Yes.

24 Q. Continuing on:

25

1 "This location at Lake Avenue was south of
2 the southern entrance to the sports complex and
3 north of the northernmost entrance to the
4 Palms Of Largo and even with the southern portion
5 of the running track that surrounds the lake at
6 Highland Recreation Center".

7 A. Yes.

8 Q. Going on:

9 "Upon speaking with Linda Hart, 1-19-62, who
10 located the blanket and thought it might be of
11 interest in this case, she stated it was in the
12 roadway".

13 A. You know how the curving is, it was like stuck in
14 there. Like you could tell had been there.

15 Q. Is there any reason you thought it was related to
16 the case other than it was a child's blanket in the relevant
17 area?

18 A. I didn't even think it was a child's blanket.
19 I thought it was like a tee-shirt or something but I thought
20 I'll just stop because those ladies had just told me that
21 they had found a Sippy cup and something at the park.
22 We'd had been looking anyway, you know, so I looked and then
23 I saw that.

24 Q. "...been looking" for what?

25 A. Anything. We were looking for evidence.

1 Anything that we could find.

2 Q. Who is the "we"?

3 A. There was a big group. There were like -- I don't
4 know what they call that organization, it has been a while.
5 "The Baby Jordan..." I didn't get her name either.
6 But they came to the park and I guess they had a big meeting
7 and then they all started looking. So that was...

8 And really I didn't even think it was a blanket.
9 I really thought it was like a tee-shirt or something. The
10 road was very busy that day.

11 Q. It says:

12 "Upon my arrival, the blanket had been removed
13 from the roadway and it was located on the ground
14 on the sidewalk".

15 A. Kicked.

16 Q. You kicked it?

17 A. Yeah, kicked. Because I didn't know what it was,
18 I just kind of kicked it up. Because it was in a ball.
19 And then he came. Nobody touched it, though. I did take
20 pictures before I moved it and I hollered to that park guy
21 and said, "Hey, can you call the police," and he said,
22 "I'll do better. I'll go get them."

23 MS. MILLER: Nothing further.

24

25

DIRECT EXAMINATION

1
2 BY MS. MAHIN:

3 Q. You mentioned that you were at one point out
4 looking for Jordan.

5 A. That morning. That like -- Because it didn't sound
6 right. Sorry, it just didn't sound right. I thought, We've
7 got a baby. A lot of the people went to the park to see.

8 Q. But was that just as a volunteer --

9 A. Yes.

10 Q. -- search capacity?

11 A. Yeah.

12 Q. So you were not there in a capacity as a volunteer
13 photographer?

14 A. No.

15 Q. Did you have your camera with you?

16 A. Yeah because I was at the park.

17 Q. Did you take in this photos during the search?

18 A. I was by myself. There was nobody even back there
19 at the Largo Preserves; there was nobody even there.

20 I didn't meet with nobody until that day, the day
21 I found the blanket. I didn't even know people had been
22 really been out looking in the group capacity that
23 they were.

24 Q. You just mentioned that you photographed the
25 blanket that was eventually collected by law enforcement.

- 1 A. Yes. I gave him the pictures.
- 2 Q. You gave who the pictures?
- 3 A. Mike.
- 4 Q. Who's Mike?
- 5 A. The guy who took my driver's license.
- 6 Q. Is it an officer?
- 7 A. Yeah, yeah, yeah.
- 8 Q. Have you ever sold any of your photos or videos
- 9 that you take for ION T.V.?
- 10 A. I have gotten money before, yes.
- 11 Q. And who paid you?
- 12 A. Steve.
- 13 Q. Who's Steve?
- 14 A. Steve Hirschfield from ION Tampa Bay.
- 15 Q. Is he the guy that runs it?
- 16 A. Uh-huh.
- 17 Q. That's a "yes"?
- 18 A. Yes.
- 19 Q. How often are you paid for photos or videos?
- 20 A. Not that often. A couple gas cards.
- 21 Q. That's how you're paid?
- 22 A. For one case in particular that was on Bellview
- 23 Road. It was a motorcycle crash.
- 24 Q. And how were you paid?
- 25 A. By like a gift card for \$40 bucks or something like

1 that. Because somebody else was interested in the pictures.

2 Q. And who is that "somebody else"?

3 A. Actually, I was contacted by three different
4 people. I'm not for sure who picked them up, or if anybody
5 picked them up.

6 Q. When you say "other people", are you talking
7 about --

8 A. News. 13, 9, 8.

9 Q. So when Steve is paying you for your photos or
10 videos, is that the because the news wanted to purchase
11 them?

12 A. We thought, yeah.

13 Q. And that didn't happen at all with --

14 A. No.

15 Q. -- this particular case?

16 A. No.

17 I still felt like there might be a conflict of
18 interest because my interest is because that's what I do and
19 then now I'm here. I wasn't for sure who was calling me
20 in here.

21 Q. When you say you thought there would be a conflict
22 of interest, what do you mean?

23 A. Because I do this. I just left another homicide,
24 well a death invest.

25 Q. And when you say "I do this", do you consider this

1 a profession?

2 A. Oh, I'd like it to be, I would. But no, I paint
3 houses for a living.

4 Q. So aside from a few gift cards, you're not paid in
5 any other way?

6 A. No.

7 Q. Why do you not have any press credentials? Do you
8 know?

9 A. Well because I'm not really the one who writes the
10 stores. I just take the pictures and then I submit them.
11 And he gets all the information from the police.

12 Q. When you say "he", you're talking about Steve
13 again?

14 A. Yeah, Steve.

15 MS. MAHIN: I don't have anything else.

16 THE DEPONENT: Next?

17 CROSS EXAMINATION

18 BY MR. BOLAN:

19 Q. So this Mike person that you gave the pictures to,
20 you think is a police officer?

21 A. He is. I know he is. I've seen him at other
22 things. But then, I didn't know then who he was. He came
23 to me and he identified himself. He said he didn't think it
24 was anything much. He let me know.

25 Q. But you know his name is Mike?

1 A. Yes, from Largo. I don't know his last name.

2 Q. How did you get the pictures to him?

3 A. I don't remember. I think I sent them through the
4 cell phone but I would have to go back. I don't... You can
5 ask him. Maybe he took them.

6 MR. BOLAN: That's all I have.

7 (The deposition concluded at 3:54 p.m.)

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CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF PINELLAS)

I, Gina M. Manning, certify that LINDA L. HART
personally appeared before me on Tuesday, February 4, 2020
and was duly sworn.

Signed this 24th day of March 2020.

Gina M. Manning

GINA M. MANNING
Shorthand Reporter
Notary Public - State of Florida
My Commission Number: #GG250426
Expires: September 5, 2022

CERTIFICATE

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STATE OF FLORIDA)
COUNTY OF PINELLAS)

I, GINA M. MANNING, Shorthand Reporter
and Notary Public, certify that I was authorized to and
did stenographically report the deposition of
LINDA L. HART, pages 1 through 19, that signatures and
formalities were not waived; and that the transcript
is a true and complete record of my stenographic notes.

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 this 24th day of March 2020.

Gina M. Manning

GINA M. MANNING
Shorthand Reporter
Notary Public - State of Florida
My Commission Number: #GG250426
Expires: September 5, 2022

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ERRATA SHEET

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LINDA L. HART