

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

Case Number: 21-01099CFANO

STATE OF FLORIDA,

Plaintiff,

vs.

CORNELIUS TREVON WHITFIELD,

Defendant.

DEPOSITION OF:

RODNEY GREEN

TAKEN BY:

Counsel for the Defendant

DATE:

April 10, 2025

TIME:

9:59 a.m. - 11:29 a.m.

PLACE:

Pinellas Co. Justice Center
14250 49th Street - 1100-4
Clearwater, FL

REPORTED BY:

Tamara M. Pacheco, RPR
Notary Public, State of FL

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EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 CARL RODNEY GREEN

3 (adduced as the deponent herein, being first duly sworn
4 upon oath, was examined and testified as follows:)

5 EXAMINATION

6 BY MS. SEIFER-SMITH:

7 Q. Can you please state your full name for the
8 record.

9 A. Carl Rodney Green.

10 Q. Okay. We're here in the matter of Cornelius
11 Whitfield. His court case number is 21-01099CF. My name
12 is Julia Seifer-Smith. Together with Margaret Russell,
13 we're assistant public defenders. We represent
14 Mr. Whitfield in this matter.

15 MS. SEIFER-SMITH: State want to make their
16 appearances?

17 MS. TAKTIKOS-DANZIG: Theodora Taktikos-Danzig.

18 MR. BRADLOW: Tony Bradlow.

19 MR. KOSKINAS: Tom Koskinas.

20 BY MS. SEIFER-SMITH

21 Q. So, good morning, Mr. Green.

22 A. Good morning.

23 Q. It's nice to meet you. We're going to talk just
24 real briefly about what a deposition is and the kind of
25 ground rules for it.

1 If you have any questions, please stop me and
2 ask me. we're just going to have a conversation. The
3 thing that you're supposed to do is to tell the truth,
4 right? You've been sworn in by our court reporter to
5 answer everything honestly.

6 We're going to be talking about things that
7 happened some years ago. So if the honest answer is you
8 don't remember something, that's what your answer is, I
9 don't remember. Fair?

10 A. Yes, ma'am.

11 Q. Okay. And likewise, if you don't know the
12 answer to a question, then that's what your answer would
13 be, I just don't know. Okay? My questions are not going
14 to be designed to trap you, confuse you, nothing like
15 that. If you are confused by a question that I ask,
16 please stop me and tell me.

17 A. Yes, ma'am.

18 Q. There was a conversation that I understand you
19 had with the State off the record about how you should not
20 be afraid to answer any questions about maybe some
21 criminal activity that you might have been involved with.

22 A. Yes, ma'am.

23 Q. It sounds like they are not interested in
24 prosecuting you for any of those things.

25 A. (Nods head.)

1 Q. Okay. So -- I'm unable to open that document.
2 So I want to talk just a little bit about your background
3 since we're just meeting for the first time, and the first
4 question that I have to ask you is if you've ever been
5 arrested before?

6 A. Yes, ma'am.

7 Q. Okay. Do you know how many times you've been
8 arrested?

9 A. Like four times.

10 Q. Four times?

11 A. (Nods head.)

12 Q. And what's your date of birth?

13 A. 9/6/90.

14 MR. KOSKINAS: Okay. I want to stop you right
15 there real quick. The reason I'm stopping is because she
16 asked you a question, and I couldn't tell from your answer
17 if it was a guess or an estimate or if you know
18 emphatically that it's only been four times. A lot of
19 times it gets confusing, and you're trying to answer
20 questions for a defense attorney.

21 But here's what I want you to do. If it is a
22 guess or an estimate, there's nothing wrong with that.
23 You need to answer the question. However, if it is a
24 guess or an estimate or you're not sure, you've got to --
25 you're going to have to verbalize that.

1 THE DEONENT: I think.

2 MR. KOSKINAS: That's something -- just some way
3 to let us know you're not positive, but it's a guess or an
4 estimate. Because she's taking down everything that
5 everybody says, and later, you won't be able to tell like
6 I could in the room that it was an estimate. Okay? On
7 paper, it will look emphatic, like I knew four was the
8 answer.

9 So if -- it's okay, but if it is a guess or an
10 estimate, you're welcome to guess. If they ask you to
11 guess, that's fine. Just make sure you verbalize that,
12 let us know I think, it's a guess, maybe, I'm not sure.
13 Just something like that. Okay?

14 THE DEONENT: All right.

15 BY MS. SEIFER-SMITH

16 Q. So do you want to qualify the four? Is it just
17 you think it was four arrests?

18 A. Yeah, I think it was. I think I've been
19 arrested four times.

20 Q. Okay. Do you know if any of those arrests led
21 to a court case? Like, did you have to come to court for
22 any of those?

23 A. Yes, ma'am.

24 Q. And do you know if any of those cases led to
25 convictions?

1 A. Yes, ma'am.

2 Q. How many of those?

3 A. There was a couple I ended up going to prison

4 for.

5 Q. Do you know how many convictions you have?

6 A. No, ma'am.

7 Q. Okay. Are you able to estimate, like a guess as

8 to how many convictions you have?

9 A. When you say convictions, you mean how many

10 times I've been to prison or how many charges I caught to

11 go to prison?

12 Q. How many charges you caught.

13 A. There was probably like seven of them.

14 Q. Okay. So you think you maybe have like seven

15 charges total, but maybe those were for separate arrests?

16 A. No. They was all arrests, seven charges.

17 Q. Okay. So maybe a few arrests during one charge

18 and a few arrests during -- I'm sorry, a few charges

19 during one arrest and a few charges during a different

20 arrest?

21 A. Okay. I've been -- I only been to county twice

22 for being drunk and for the drug charges.

23 Q. Did you go to prison for the drug charges?

24 A. Yes, ma'am.

25 Q. Okay. And that was all maybe seven? Could be

1 less, could be more?

2 A. A few times juvie. I only been in trouble twice
3 as adult.

4 Q. okay. And when you -- when you had those cases
5 and you went to prison, was it pursuant to a plea, or did
6 you go to trial?

7 A. I plead.

8 Q. Were you represented by the Public Defender's
9 office or by private counsel?

10 A. Public defender.

11 Q. Okay. And do you remember when that was?

12 A. April 19, 2012.

13 Q. Okay. So quite some time ago.

14 A. Yes, ma'am.

15 Q. And you said you went to prison. Do you recall
16 how long that was?

17 A. Fifty-six months.

18 Q. That's pretty specific. Not in trouble since
19 you were released?

20 A. No.

21 Q. Are you currently employed?

22 A. Yes, ma'am.

23 Q. Can you tell me what you do?

24 A. Did you say employed? No, I'm not -- I don't
25 have a job. I thought you said unemployed.

1 Q. So you're unemployed. what do you do for an
2 income? Like, do you have social security, disability?

3 A. Yeah, I'm waiting on disability.

4 Q. So you applied for disability, but you're
5 waiting to hear back from the administration?

6 A. Yes, ma'am.

7 Q. And I understand Mr. Bradlow told me earlier
8 this week that you were in the hospital with a seizure
9 disorder. Is that right?

10 A. Yes, ma'am.

11 Q. I'm sorry to hear that. How are you feeling
12 today?

13 A. I'm feeling all right.

14 Q. If at any point in time you need to take a
15 break, you need some water, stretch your legs, you just
16 let us know. Is that fair?

17 A. Yes, ma'am.

18 Q. This seizure disorder, is that something that
19 you have been dealing with for a long time?

20 A. Since I was fifteen.

21 Q. okay. And how often do the seizures hit?

22 A. They come and go. I just -- I probably had six
23 this month already. Then I go three or four months
24 without them, and then they come back. They do what they
25 want to.

1 Q. okay. Do you take any kind of medication for
2 that?

3 A. Yes, ma'am.

4 Q. Can you tell me what that is?

5 A. Keppra.

6 Q. Okay. Anything else?

7 A. (Shakes head.)

8 Q. Does the Keppra help?

9 A. They say it's supposed to help but --

10 Q. But you don't see the help?

11 A. I still have them, so. . .

12 Q. Do you feel any kind of side effects from the
13 Keppra? Does it make your thinking slower? Does it make
14 it harder to concentrate? Make you sleepy?

15 A. Just makes me sleepy.

16 Q. Okay. Did you take your Keppra this morning?

17 A. No.

18 Q. So you're feeling pretty sharp today?

19 A. Yeah, I feel good. Yes, ma'am.

20 Q. And like I said, if there's any point in time
21 during our conversation you're not feeling so great, you
22 just tell us that you need to take a break. Okay?

23 A. (Nods head.)

24 Q. Where are you from?

25 A. St. Pete.

1 Q. So born and raised in St. Pete?

2 A. Born and raised. Yes, ma'am.

3 Q. Did you ever live anywhere else besides

4 St. Pete?

5 A. (Shakes head.)

6 Q. No?

7 A. (Shakes head.)

8 Q. I just need your answers to be out loud.

9 A. Oh, no. I'm sorry.

10 Q. You're fine. I know it's a strange way of

11 speaking. We're obviously able to see each other, but

12 Ms. Tammy is taking down everything that we say; so if you

13 don't answer out loud, then she doesn't know what the

14 answer is.

15 A. Yes, ma'am.

16 Q. So you've never lived anywhere besides St. Pete,

17 Florida. Is that right?

18 A. Yes, ma'am.

19 Q. Okay. So I want to talk a little bit about the

20 people with whom you had some relationships who were

21 involved in this case. So Deronrick Green, that's your

22 brother. Is that right?

23 A. Yes, ma'am.

24 Q. Older brother? Younger brother?

25 A. Oldest brother.

1 Q. okay. So you've known him your entire life?

2 A. I'm the youngest brother.

3 Q. And what's your relationship been like with

4 Deronrick?

5 A. Like my best friend.

6 Q. Yeah. You said your -- Deronrick is your oldest

7 brother. How many of you are there?

8 A. There's seven of us.

9 Q. Goodness, that's busy. And you're the youngest?

10 A. (Nods head.)

11 Q. Is that right?

12 A. Yes, ma'am.

13 Q. So there are, what, five in between yourself and

14 Deronrick?

15 A. No. It's -- it would be the fourth oldest.

16 Q. oh, I see. How close are you in age to

17 Deronrick?

18 A. He's, what, thirty-eight. Like three years

19 apart.

20 Q. okay. Did you grow up really close with him?

21 A. Yes, ma'am. I'm sorry.

22 Q. You're fine. And you don't need to add the

23 ma'am. That's just like a gift for me. Thank you.

24 Did you go to school with Deronrick?

25 A. Yes.

1 Q. That's fine. And do you and Deronrick share a
2 mom and a dad?

3 A. Yes.

4 Q. Okay. And you grew up in the same house?

5 A. Yes.

6 Q. How do you know Darren Barnes?

7 A. Through my brother.

8 Q. Okay.

9 A. I met him through Dee.

10 Q. So does Darren go by D? Does your brother go by
11 Dee?

12 A. Well, my brother goes by Dee. The one that
13 passed go by D-Cash.

14 Q. D what?

15 A. Cash.

16 Q. D-Cash. Okay. I got it. So how long do you
17 think you've known or had known D-Cash/Darren?

18 A. Probably fifteen years. Probably longer.

19 Q. A long time.

20 A. (Nods head.)

21 Q. And you said that you knew -- is it okay if I
22 refer to him as Darren?

23 A. Uh-huh.

24 Q. Yes. Okay. You said that you knew Darren
25 through Deronrick?

1 A. Uh-huh.

2 Q. Is that because Darren and Deronrick were closer

3 in age?

4 A. They was -- they was like best friends.

5 Q. Okay. So Deronrick and Darren are close

6 friends, and then you met Darren because you're close with

7 your brother?

8 A. Yeah.

9 Q. Okay. And how do you know Cornelius Whitfield?

10 A. Through them.

11 Q. How long have you known Cornelius?

12 A. Not even -- I heard of him, but I didn't meet

13 him until that night.

14 Q. You had never met Cornelius before that night?

15 A. Huh-uh.

16 Q. Is that a no?

17 A. Never met him until that -- until he started

18 coming around.

19 Q. Okay. And when did he start coming around?

20 A. I think he got out of prison November of that --

21 of '20, like 2020.

22 Q. Okay. So it sounds like you had not met him

23 before November of 2020. Is that fair?

24 A. Yes, ma'am.

25 Q. Okay. Did you see him between November of 2020

1 and February of 2021?

2 A. Yes.

3 Q. How many times do you think you saw him?

4 A. About three times.

5 Q. Had you heard anything about him before you met
6 him? Like, did your brother or did D-Cash say anything
7 about Cornelius before he came by?

8 A. Not really, besides that he was coming home.

9 Q. So just he's coming home. Nothing else about
10 him?

11 A. (Shakes head). No.

12 Q. Do you know how Deronrick or Darren knew
13 Cornelius?

14 A. I guess they grew up together.

15 Q. It sounds like that's a guess. You didn't know
16 one way or the other?

17 A. Yeah. Well, they grew up together.

18 Q. Okay. How did you know that?

19 A. Because they told me.

20 Q. Okay.

21 A. When I asked who he was, he was like grew up
22 together all your life.

23 Q. Did they tell you anything else about him?

24 A. No, ma'am.

25 Q. Do you remember any kind of initial impression

1 that you had when you met him for the first time?

2 A. Hell yeah. I knew something was wrong with him.

3 Q. Okay. Tell me why.

4 A. I been in psych camps, and I take seizure

5 medication, right. He sat over there the whole day and

6 didn't say nothing.

7 Q. This was not the first time that you met him

8 though. Is that right?

9 A. No. This is like the third time now.

10 Q. What about the first time that you met him?

11 A. First time I met him, I just said, what's up?

12 They was like, This Cornbread. Just introduction.

13 Q. So it sounds like you didn't spend a lot of time

14 with him that occasion?

15 A. No. No, ma'am.

16 Q. Do you remember anything about the second time

17 that you saw him?

18 A. (Nods head.)

19 Q. Tell me about that time.

20 A. When he came over there, he kept playing with

21 his gun.

22 Q. Is this still the February 2nd?

23 A. No. This like in between November and February.

24 I first met him in November. I seen him a couple of

25 times. Then he came back February, and that's when all

1 this happened.

2 Q. Okay. So I don't want to get to like the reason
3 that we're all here today just yet. I just want to know
4 more about the times that you had seen Cornbread before.

5 A. I can't really tell you. I seen him, like,
6 twice between that time.

7 Q. Okay. I'm just curious about what you remember
8 of that. And if you don't remember much, that's okay.
9 That's your honest answer. I just want to know if you do
10 remember anything.

11 A. Yeah. I don't -- I don't remember much between
12 them times, but that day, vivid. I'll never forget it.
13 But in between, no, can't be that specific.

14 Q. Before we get into some more things, I want to
15 ask about a few more people. Laquanda Green, who is that?

16 A. My brother's wife.

17 Q. How long have they been married?

18 A. About four years now, I think.

19 Q. And were they together like more than four
20 years?

21 A. Previous, I think so. But I was in prison when
22 they met, so I think so. So, yeah.

23 Q. Do you know much about Laquanda? Do you spend
24 much time with her?

25 A. Not besides my brother loves her.

1 Q. Did Laquanda ever come to the apartment at 175
2 75th Avenue South?

3 A. No. If she did, not when I was there. I never
4 seen her out there.

5 Q. Do you know the name Brittany Barnes?

6 A. Yes. Rest in peace Brittany.

7 Q. Who is Brittany Barnes.

8 A. A close friend of ours that passed.

9 Q. Okay. You said a close friend of ours. Who
10 is --

11 A. Us. Me, Dee, and Cash.

12 Q. And how did you all know her?

13 A. We met her -- she was, you know, a buddy, a drug
14 user.

15 Q. Okay. So was she buying drugs from you all?

16 A. (Nods head.) Yes.

17 Q. What kind of drugs?

18 A. Pills.

19 Q. What kind of pills, if you know?

20 A. I don't know. I wasn't selling pills, so I
21 don't know.

22 Q. Who was selling pills?

23 A. D-Cash.

24 Q. Okay. I understand that it was her name that
25 was on the lease for the apartment. Do you know anything

1 about that arrangement?

2 A. No, I don't know nothing about that. I didn't
3 know that.

4 Q. Who was the person who like set up the
5 apartment?

6 A. I don't know nothing about that. I don't want
7 to lie to you. I don't have no clue.

8 Q. Okay. Do you know the name Richard Hammonds?

9 A. No.

10 Q. What about Selena Troupe?

11 A. Yeah, I know Selena Troupe. That was my
12 girlfriend at the time.

13 Q. Okay. Would Selena come by the apartment?

14 A. Yeah, she came by there.

15 Q. Do you know how often she would come by the
16 apartment?

17 A. No. I'd be lying if I say that.

18 Q. Do you know if Selena was there the night that
19 everything happened?

20 A. No, she wasn't.

21 Q. Okay. She had not been there that day. Is that
22 right?

23 A. No, ma'am.

24 Q. So the apartment -- I'm sorry, just let me get
25 the address. Let me see if I can pull it up. So I know

1 they're called the Emerald Pointe Apartment Complex. Had
2 you spent much time there?

3 A. Yes.

4 Q. Okay. When did you start spending time there?

5 A. Probably like the beginning of 2020.

6 Q. Okay. And when you went there for the first
7 time, tell me about that. Like, how did you end up there?

8 A. End up to the apartment?

9 Q. Yeah. Were you going to rent an apartment? Did
10 somebody call you and tell you to come over? Like, how
11 did that happen?

12 A. I was just coming over.

13 Q. Okay. And, sorry, I have the address. Let me
14 know if this sounds correct. 175 73rd Avenue North,
15 apartment 113. Does that sound right?

16 A. I'd be lying to you sweetheart. I don't --

17 Q. You just don't remember?

18 A. I don't remember that part.

19 Q. Do you remember that it was like the Emerald
20 Pointe apartment complex?

21 A. Yeah, I remember that, on Fourth Street.

22 Q. You just don't remember the apartment number?

23 A. Yeah.

24 Q. And who called you over to come by the
25 apartment?

1 A. Ain't nobody called me. Just my daily routine.

2 I come from the south side. I come back here.

3 Q. Was there -- I know that Brittany's name was on
4 the lease. It sounds like you didn't know anything about
5 that.

6 A. No.

7 Q. Would Brittany come to the apartment?

8 A. Yeah, sometimes she would.

9 Q. Did she stay at the apartment?

10 A. No.

11 Q. Did anybody stay at the apartment?

12 A. No. Sometimes we'll stay the night, but like,
13 it was not regularly like, no.

14 Q. What was the apartment for?

15 A. (No response.)

16 Q. You can tell us. They're not going to prosecute
17 you.

18 A. Drugs. We was trappin' out of there, using it
19 to sell drugs.

20 Q. Okay. I think you mentioned that you were there
21 just about every day?

22 A. Uh-huh.

23 Q. Is that a yes?

24 A. Yes, ma'am.

25 Q. Okay. And it sounds like when you say "we" were

1 trapping out of it, does that mean like yourself, your
2 brother Deronrick, and Darren?

3 A. Yes, ma'am.

4 Q. Anybody else who was selling out of that
5 apartment?

6 A. No, not until we fightin' his ass.

7 Q. Are you talking about Cornelius?

8 A. Yes.

9 Q. Okay. What kind of drugs were you selling out
10 of the apartment?

11 A. Crack, weed, pills.

12 Q. In what kind of amounts?

13 A. I don't know how to answer that.

14 Q. Like, were people buying large amounts, or did
15 it seem like they were going to sell themselves, or was it
16 just like personal use?

17 A. It was a large amount.

18 Q. Okay. Like trafficking amounts?

19 A. I don't know what trafficking is, so I can't --
20 I'd be lying if I said yeah.

21 Q. How was it packaged when it came to you?

22 A. Dime bags. Nick bags.

23 Q. Okay. That's how you received it?

24 A. Uh-huh.

25 Q. Is that a yes? Would you repackage it?

1 A. Yeah.

2 Q. And how would you repackage it?

3 A. Oh, I'm sorry. I thought you asked me that the

4 first time.

5 Q. You were packaging it into dime bags and nickel

6 bags?

7 A. Yes.

8 Q. Okay. So you would get it in a larger amount?

9 A. Yes, ma'am.

10 Q. Okay. And was it you who was getting the larger

11 amount of drugs, or was it somebody else, Deronrick or

12 Darren?

13 A. It was someone else.

14 Q. Not you?

15 A. No.

16 Q. Okay. You were just involved in like the

17 packaging and the dealing like out of the apartment. Is

18 that fair?

19 A. Yes, ma'am.

20 Q. And so would people come to the apartment to buy

21 drugs?

22 A. Yes.

23 Q. Would people use at the apartment?

24 A. No.

25 Q. Did you, Darren, or Deronrick use any drugs?

1 A. Outside of weed, no.

2 Q. Okay. So you would use marijuana?

3 A. Yes.

4 Q. How often were you smoking marijuana?

5 A. Every day.

6 Q. Okay. Like multiple times a day?

7 A. Yes.

8 Q. Did you sell weed too?

9 A. Yes.

10 Q. Okay. And how -- what kind of amounts of weed?

11 A. Pounds.

12 Q. So correct me if I'm getting this wrong, but you

13 would sell about a pound of weed at a time, right? Like,

14 not packaging it any smaller, but the crack you were

15 packing much smaller for users. Is that fair?

16 A. Uh-huh. Uh-huh. Yes.

17 Q. And when were you, like, open for business?

18 A. Twenty-four/seven.

19 Q. Okay. And how did you get business?

20 A. Well, you got to go out there and find it. Put

21 your name out there.

22 Q. Explain that to me.

23 A. Like how you advertise in commercials, you

24 advertise, like, hey, I got what you're looking for type.

25 Q. Okay. So were you going out there to put your

1 name out?

2 A. Yes.

3 Q. okay. So you were out in the community?

4 A. Uh-huh.

5 Q. Is that a yes?

6 A. Yes.

7 Q. okay. How about Darren?

8 A. No. He was more of a homebody.

9 Q. So he would mostly stay at the apartment?

10 A. Yes.

11 Q. okay. How about Deronrick?

12 A. Same.

13 Q. Mostly at the apartment?

14 A. Yes, ma'am.

15 Q. So it sounds like you were in charge of getting

16 the business to come into the apartment?

17 A. Yes, ma'am.

18 Q. If you were getting people to come to the

19 apartment, did you like walk them over, or were you giving

20 out phone numbers so that they could --

21 A. Giving out phone numbers.

22 Q. Whose phone numbers were you giving out?

23 A. Mine.

24 Q. So they would, what, call you, and then you

25 would tell Darren or Deronrick you're coming over?

1 A. Yes. I would -- well, I'll just make the play
2 myself. I wouldn't let nobody come over. I just did it.

3 Q. So does that mean you're like going out --

4 A. (Nods head.)

5 Q. -- with drugs on you --

6 A. Yes.

7 Q. -- in order to make the play?

8 A. Uh-huh.

9 Q. Is that a yes?

10 A. Yes.

11 Q. Okay. Did you have people come to the apartment
12 in order to make plays?

13 A. Sometimes, yes.

14 Q. Okay. Tell me about that. Like, how did you
15 determine who could come into the apartment or who you
16 would serve out in the world?

17 A. I don't really know how to answer that. Can you
18 ask me that again? That's kind of like --

19 Q. Sure. So how did you decide who you would have
20 come to the apartment to buy drugs versus who you would
21 serve in the community?

22 A. Well, I wouldn't serve, like, somebody that
23 don't do it. Somebody that's selling it, I'm not going to
24 serve. I'm going to serve people that actually do it.

25 Q. You're just serving drug users?

1 A. Yeah, drug users.

2 Q. Okay. Are you like -- is it like a gut feeling
3 that you get about whether or not you're going to invite
4 somebody to the apartment or not?

5 A. Well, I don't -- I don't invite nobody to the
6 apartment because it actually wasn't mine, so -- I don't
7 trust people. I know the -- I know the business of the
8 game. So I'm not bringing nobody to my doorstep. So I'm
9 coming to you.

10 Q. So tell me about that phrase, "the business of
11 the game." What does that mean to you?

12 A. What I mean by that, I'm not going to show you
13 where I lay my head and where my stuff at because you
14 might rob me; so therefore, I move in the streets.

15 Q. Okay. It sounds like sometimes that can be a
16 dangerous game.

17 A. Yes, very dangerous game.

18 Q. Were you ever in fear that somebody might rob
19 you?

20 A. I been robbed before, so that happens. I
21 already know that.

22 Q. Before this happened you had been robbed?

23 A. (Nods head.)

24 Q. At that same apartment?

25 A. No.

1 Q. Where were you robbed before?

2 A. In the neighborhood.

3 Q. Something that you reported to the police?

4 A. No.

5 Q. Why not?

6 A. Because it's part of the game.

7 Q. Okay. That robbery, was it like an armed

8 robbery? Like somebody held you up at gunpoint?

9 A. Uh-huh.

10 Q. Is that a yes?

11 A. Yes, ma'am.

12 Q. Was it somebody who was known to you?

13 A. No. I didn't know who it was.

14 Q. But they held you up at gunpoint. They

15 threatened your life in order to get, what, drugs, money

16 from you?

17 A. Yes, jewelry, all that.

18 Q. So they stole your drugs, your money, and your

19 jewelry?

20 A. Yes, ma'am.

21 Q. Do you remember when that was?

22 A. Probably about 2010 it happened. 2009 and '10.

23 Q. So before you went to prison?

24 A. Yes, ma'am.

25 Q. And did you decide to do -- like, were you armed

1 at that time?

2 A. No, ma'am.

3 Q. Did you decide to like do something for your own

4 personal security so that that wouldn't happen again?

5 A. Yeah, I brought a gun.

6 Q. Did you always have a gun on you?

7 A. Yes.

8 Q. Okay. Do you remember what kind of gun you had?

9 A. A .40.

10 Q. A .40?

11 A. Yeah.

12 Q. Is that right?

13 A. Yes.

14 Q. Do you remember the brand or anything else about

15 it?

16 A. No, not really. No, ma'am.

17 Q. Where did you get the .40?

18 A. Off the streets.

19 Q. Do you remember if there was a serial number on

20 it or if the serial number had been removed?

21 A. Yeah. There was a serial number.

22 Q. Do you remember anything else about what it

23 looked like, like what color it was?

24 A. Black.

25 Q. Did it have a holster?

1 A. Did I have a holster?

2 Q. Did you have a holster?

3 A. Yes.

4 Q. And what kind of condition was it in?

5 A. Brand new.

6 Q. So brand new when you got it on the streets?

7 A. (Nods head.)

8 Q. Did it get any kind of damage while you owned

9 it?

10 A. (Shakes head.) No.

11 Q. And did you always carry it with you?

12 A. No. I wish I had it that night. No.

13 Q. When you were out of the apartment did you carry

14 it?

15 A. Yes.

16 Q. When you were inside of the apartment -- we're

17 talking about the one that you shared with Deronrick and

18 Darren.

19 A. There was no need.

20 Q. Okay. When you were inside the apartment, where

21 would you put it?

22 A. It was in a drawer.

23 Q. And did anybody else, like, carry a gun, if you

24 know?

25 A. Yes.

1 Q. okay. who else?

2 A. All of us.

3 Q. So like Deronrick would carry a gun as well?

4 A. Well, not really. Not him. Me and Cash really.

5 Q. Do you know what kind of gun Cash had?

6 A. I think it was a nine, 9mm.

7 Q. Do you remember much about what it looked like?

8 A. Nah. No, ma'am.

9 Q. You don't remember the color?

10 A. Black.

11 Q. And do you know how he carried it? Did he carry

12 it in a holster?

13 A. No, no. I didn't pay attention to all that.

14 Q. So you don't know if it was in a holster or in

15 pocket, anything like that?

16 A. (Shakes head.) Huh-uh.

17 Q. Is that a no?

18 A. No.

19 Q. And do you know if he would like take it off

20 when he was in the apartment, like if he would put it

21 somewhere?

22 A. Yes. We all I'm pretty sure, yeah, set it down.

23 Q. Do you know where he would put his?

24 A. No.

25 Q. And when you say you would put it in a drawer,

1 what room are we talking about and what piece of
2 furniture, if there was furniture?

3 A. Well, I kept mine in the living room drawer.

4 Q. Was it like a coffee table drawer?

5 A. Like a little drawer. Yeah, you can say that.

6 A little nightstand, little drawer.

7 Q. Was it like a piece of furniture next to the
8 couch?

9 A. Yeah, right in front of the couch.

10 Q. Right in front of the couch. I see. And was
11 there anything else that would go in that drawer?

12 A. Gauze, razors, stuff like that.

13 Q. Did you keep any ammunition in the apartment?

14 A. Not that I know of.

15 Q. Did you keep any personal effects, like your own
16 personal stuff in the apartment?

17 A. Like clothes and all that?

18 Q. Anything that belonged to you.

19 A. Yeah. Some nights I stayed the night.

20 Q. So you would have clothes there?

21 A. Yes, ma'am.

22 Q. Okay. Anything else personal to you, like
23 personal documents, jewelry? Anything like that?

24 A. No.

25 Q. So just clothes to change into. Is that right?

1 A. Yes, stuff like that, shoes.

2 Q. And I think you said earlier that like you
3 didn't necessarily want people coming to the apartment to
4 buy drugs, but there were people coming to the apartment
5 to buy drugs. Is that right?

6 A. What I mean by that, I'll serve a smoker, a
7 person that used it. But you trying to buy it and sell
8 it, no, I'm not selling nothing to you.

9 Q. So you would serve drug users, not drug dealers
10 out of the apartment?

11 A. Uh-huh. Yes.

12 Q. People that you knew were a user rather than a
13 dealer. Is that right?

14 A. Yeah, that's gonna sit right here and smoke it
15 in front of me.

16 Q. So was that like a condition for selling out of
17 the apartment, like you're going to use it right in front
18 of me?

19 A. Yes, with me.

20 Q. Okay. How about with cash?

21 A. I don't know. Everybody had they -- they do
22 things different.

23 Q. Okay. So it sounds like his policy in terms of
24 who's coming to the apartment might be different than your
25 policy?

1 A. See, I'm basically the little brother. I really
2 have no say-so.

3 Q. okay. So they decide. Deronrick and Darren are
4 deciding who they're going to serve out of the apartment?

5 A. (Nods head.)

6 Q. Is that right?

7 A. Yes.

8 Q. So were they serving maybe dealers in larger
9 amounts than a drug user?

10 A. That I don't know.

11 Q. okay. And why don't you know that? Is it just
12 because you weren't necessarily there all the time?

13 A. Yeah. Some stuff just ain't my business.

14 Q. Okay. So is it like you don't want to know?

15 A. It ain't my business.

16 Q. Okay. So you're not inserting yourself in their
17 business. They're not inserting themselves in your
18 business?

19 A. No, ma'am.

20 Q. And do you know if there had ever been -- like
21 you experienced a robbery yourself in the community --

22 A. Yes.

23 Q. -- it sounds like over ten years before all this
24 happened. Do you know if Darren or Deronrick had ever
25 been robbed?

1 A. No, that I don't know.

2 Q. You don't know. Okay. Do you know if there had

3 ever been any kind of robbery at the apartment before

4 this?

5 A. No, ma'am.

6 Q. Did you have any kind of problems at the

7 apartment, like from any other tenants or anything like

8 that?

9 A. No, ma'am.

10 Q. Did you ever experience any kind of problems

11 with any drug users?

12 A. No.

13 Q. Okay. So I want to just come back to you were

14 talking about having met Cornelius maybe two times before

15 this happened.

16 A. Uh-huh.

17 Q. The first time, do you remember where it was

18 that you met him?

19 A. Apartment.

20 Q. Okay. Had he been invited to the apartment?

21 A. He had just got out of prison.

22 Q. Did somebody invite him to the apartment?

23 A. I guess my brother or Cash did.

24 Q. Okay. And it sounded like that was kind of a

25 short meeting. You said you don't really remember much

1 about that?

2 A. I remember he got out. I remember he gave him
3 some money. He left.

4 Q. Who gave him money?

5 A. Both of them.

6 Q. Do you remember how much money was given?

7 A. I think my brother gave him like 3500. Then
8 Cash gave him like everything out of his pocket. I don't
9 remember what it was, but he gave him everything out of
10 his pocket, every fucking dime.

11 Q. So we're talking about all cash, right?

12 A. Yeah.

13 Q. Okay. Do you remember any kind of like further
14 conversation between them?

15 A. No, ma'am.

16 Q. Do you remember Cornelius's behavior that day?

17 A. He just -- he was just too quiet. He just
18 seemed off. Like you sat around us for damn near 24-hours
19 and you said nothing.

20 Q. This is still that first time you met, or are we
21 talking about?

22 A. Every time. Every time I met him. He'd speak,
23 sit there, and just sit there. Sit there and stare like
24 something is wrong with him. So when I say something to
25 them, they like -- I can't argue with them because that's

1 like -- they know each other. I don't know him, but I
2 know him. If he tells me he's cool, I'm going to be like,
3 all right, because that's your homeboy.

4 Q. Yeah. You trusted your brother.

5 A. Yeah, I trusted my brother.

6 Q. Okay. And you said this was the very first time
7 you had ever met Cornelius?

8 A. Yeah. It was like November, December. November
9 something he got out. He just got out of prison doing
10 like twelve years or something.

11 Q. Okay. And he already -- he seemed not right?

12 A. Yes, ma'am.

13 Q. All right. That first day did he do any kind of
14 drugs that you saw?

15 A. Yeah. The boy was snorting coke or something.

16 Q. Do you know what it was?

17 A. He was snorting coke, do ecstasy. He was a
18 druggie.

19 Q. Did you see him do all those drugs?

20 A. Yes.

21 Q. Okay. Were those drugs provided by Deronrick or
22 Cash?

23 A. I don't know where he got it from to be honest.

24 Q. Okay. But you saw him snort a line?

25 A. Uh-huh.

1 Q. Is that right?

2 A. Yes.

3 Q. And you assumed that was cocaine. Is that fair?

4 A. (Nods head.)

5 Q. Is that a yes?

6 A. Yes.

7 Q. And then you said he was also doing molly. Can

8 you tell me what you saw him do?

9 A. Well, the molly just looked like crystal. He'd

10 just eat it.

11 Q. Is that what he did?

12 A. Just popped it back.

13 Q. Did he smoke any marijuana?

14 A. No. I didn't see him smoke.

15 Q. Drink any alcohol?

16 A. No.

17 Q. And do you remember about how long he was there

18 at the apartment that first time?

19 A. First time, no, I can't. I can't recall. But

20 last time, yes.

21 Q. I know. After -- after he left that first time,

22 did you say anything to Deronrick or Cash?

23 A. Yeah. Yes.

24 Q. What did you say?

25 A. I asked them what was wrong with him.

1 Q. And what did they say?

2 A. They like, that's their homeboy. That's him as
3 a person. So I can't argue with them.

4 Q. And I know you had never met him before. So you
5 didn't have like a baseline if he'd ever been different or
6 if that's just who he was.

7 A. Yeah.

8 Q. Did they say anything like he hasn't always been
9 like that, this is new? Anything like that?

10 A. No. All my brother said was -- because Cash
11 knew him too, but it was more of a relationship with my
12 brother. So Cash -- we all met him through my brother
13 basically.

14 Q. Okay.

15 A. So once he was like that is his personality,
16 it's him as a person, I can't argue with my brother
17 because that's your friend.

18 Q. Okay. Did you hear anything about him before
19 you saw him that second time?

20 A. Huh-uh.

21 Q. No?

22 A. No.

23 Q. Okay. And then you said there was a second
24 time. So somewhere between November and February you saw
25 him again?

1 A. Uh-huh.

2 Q. Is that a yes?

3 A. Yes.

4 Q. Where was that?

5 A. The apartment.

6 Q. Okay. Do you know if he was invited to the

7 apartment or if he just showed up?

8 A. He just showed up.

9 Q. Okay. How do you know that he just showed up

10 and wasn't invited?

11 A. Because I was coming in as he was coming.

12 Q. Okay.

13 A. Then my brother told him, No, come back when we

14 come back from the Super Bowl party. Cash told him, Go

15 on, brother. Let him stay. My brother said tell him to

16 leave at 12 o'clock. At 12 o'clock, I was calling the

17 damn police.

18 Q. This is -- sorry. You told me that you had seen

19 him three times total and that the third time was the time

20 of like the robbery, shooting, et cetera?

21 A. Right.

22 Q. Are we talking about that time, or are we

23 talking about --

24 A. I'm talking about that time. The second time he

25 just came through. They gave him something. He chilled

1 and then he left.

2 Q. Did he seem strange that second time when he
3 came by?

4 A. Yeah. He didn't do no talking. You can't
5 -- I ain't never trusted him.

6 Q. Did he do anything besides not talk that you
7 found bizarre?

8 A. He always clutching his fire. He always playing
9 with it.

10 Q. In what way? You said just like putting it in
11 his waistband and taking it out?

12 A. Just playing with it. I think he had it on his
13 mind already what he was going to do. He just had to find
14 the courage.

15 Q. Is this every time that he's there, the first
16 time, second time, and third time?

17 A. The second time he came, when they told him to
18 leave, he clutched his fire. Right then and there, I
19 think he was going to do what he did until Cash said,
20 Bruh, let him stay. He already had it in his mind what he
21 was going to do. He just -- Dee ended up just going home.
22 If Dee would have kept -- if both of them was like go
23 home, he would have did what he did right then and there.

24 Q. Okay. He didn't say that he was going to hurt
25 anybody? He didn't say anything at all?

1 A. Huh-uh.

2 Q. No. So it's just like your gut feeling that he

3 had planned what he was going to do. Is that right?

4 A. (Nods head.)

5 Q. When you said he like clutched his fire the

6 second time until cash said no, he can stay, do you

7 remember what that gun looked like?

8 A. It was a .40. I know that much, .40 caliber.

9 Q. How do you know that?

10 A. Because the doctor told me.

11 Q. Okay. This is the time you were shot. I'm

12 talking about the second time when you said he was

13 clutching it and then left.

14 A. Oh, yeah, it was a .40. Yeah, it was a .40.

15 Q. Okay. Was it because it was the same gun that

16 you saw the third time?

17 A. Yeah. Yes, ma'am.

18 Q. Okay. Was he given anything before leaving that

19 second time?

20 A. No.

21 Q. Okay. So like no money, no drugs?

22 A. (Shakes head.)

23 Q. No? Is that a no? Sorry.

24 A. No. I'm sorry.

25 Q. No, you're okay. Mr. Green, I know that this is

1 really hard, and you're doing a really great job. So just
2 take your time.

3 okay. Now, I want to talk about, like,
4 February 1st. So it sounds like there was something about
5 a Super Bowl that day, or was that before?

6 A. They was planning on going to a Super Bowl. I
7 think the Super Bowl was like the 3rd of that month. The
8 Bucs beat the Chiefs or something.

9 Q. Okay. Yeah. So on the 1st, February 1st, what
10 were you doing that day? Like, start from the beginning.

11 A. I was just coming back from the south side, so I
12 was coming in.

13 Q. What did you -- I want to start from the very
14 beginning. Like in the morning, what did you do?

15 A. Oh, I ain't -- I think it was afternoon that I
16 got there, around 8 o'clock. 8 o'clock p.m. is when I got
17 there.

18 Q. Okay. So in the morning, like no contact with
19 your brother?

20 A. No.

21 Q. No contact with Cash?

22 A. No. No, I didn't see them until later on that
23 night.

24 Q. Okay. So you hadn't stayed at the apartment the
25 night before?

1 A. No.

2 Q. All right. Did you have plans with them, or was

3 it just like you didn't have to have plans to go by the

4 apartment?

5 A. Yeah. I didn't have plans.

6 Q. Did you call anybody, tell them what you were

7 going to do?

8 A. I called my brother, told him I was on the way.

9 Q. And did your brother answer the phone?

10 A. Uh-huh.

11 Q. Is that a yes?

12 A. Yes.

13 Q. And do you know where your brother was when he

14 answered the phone?

15 A. He was there.

16 Q. He was already at the apartment?

17 A. Uh-huh.

18 Q. Is that a yes?

19 A. Yes.

20 Q. So you told him that you were on your way. Did

21 you drive to the apartment?

22 A. Yes.

23 Q. Okay. And is -- was it just yourself, going by

24 yourself?

25 A. Yes.

1 Q. okay. what time did you get there?

2 A. About eight something. I know for a fact it was

3 around eight something.

4 Q. 8 p.m.?

5 A. Yes, ma'am.

6 Q. And who was at the apartment when you arrived?

7 A. It was Cash and my brother, and as I'm

8 getting -- I'm like two minutes. I'm not even there two

9 minutes and the door -- (Indicating.) There's someone at

10 the door.

11 Q. When you arrive, what were Cash and Deronrick

12 doing?

13 A. Chillin' and playing Madden.

14 Q. So like playing a video game?

15 A. Uh-huh.

16 Q. Is that a yes?

17 A. Yes.

18 Q. And like when you walk in, are they doing

19 anything else or any --

20 A. Just chillin', smoking.

21 Q. So nobody is coming by?

22 A. No.

23 Q. And when you said smoking, like smoking

24 marijuana?

25 A. Yes, ma'am.

1 Q. Okay. Smoking how? Like, pipe? Joint?
2 A. Joint.
3 Q. You said you walk in and not even two minutes
4 later --
5 A. He knocked on the door.
6 Q. And "he" is Cornelius?
7 A. Yes, ma'am.
8 Q. Do you know him by any other name?
9 A. They call him Cornbread, I guess.
10 Q. That's what you heard from Deronrick or Cash?
11 A. Yes.
12 Q. What did you call him? Did you ever call him a
13 name to his face?
14 A. Cornbread.
15 Q. So he knocks on the door. What happens next?
16 A. They let him in. We standing at the door.
17 They're standing at the door talking because Dee wasn't
18 going to let him in.
19 Q. Dee your brother?
20 A. Yes. Because my brother is thinking, Bruh, I
21 just gave you \$3500. He just gave you this,
22 da-da-da-da-da. What'chu here for? What'chu need? So my
23 brother told him, No, come back after the Super Bowl.
24 D-Cash said, No, brother, let him stay. All the shit --
25 Q. Now, I guess I'm a little confused. So this is

1 the time that --

2 A. This is when everything popped off.

3 Q. okay. So is this the time you're saying that
4 Cornbread was like clutching at his fire like at his
5 waistband?

6 A. When my brother told him no, come back, he went
7 to clutching. He basically was -- I feel like he was
8 going to do what he wanted to do right then and there if
9 D-Cash don't say, No, bro, that's our dawg. Let him stay.
10 That's what made him prolong it.

11 Q. Where is everybody when this conversation is
12 happening?

13 A. We all in the living room. We're at the door.
14 He's standing outside the door. We all are standing at
15 the door talking to him.

16 Q. Okay. So everybody is standing up. Nobody is
17 sitting on the couch or anything?

18 A. Nobody is sitting down. We're all standing up
19 talking to him. Well, they're talking to him.

20 Q. Were you talking to him?

21 A. No.

22 Q. Were you standing up at the door?

23 A. I was standing up.

24 Q. Did anybody else see Cornbread clutching at his
25 fire, if you know?

1 A. No. I don't -- personally, I don't think so.

2 Q. Why don't you think so?

3 A. Because I don't think -- I don't think Cash

4 would have let him stay. Like, we all from the streets,

5 so we all know what time it is. So I don't think if he

6 seen that he would have let him stay.

7 Q. Okay. So what happened next?

8 A. When my brother said let him stay to 12 o'clock,

9 my brother goes home.

10 Q. Sorry. So when you say your brother, Cash said

11 you can let him stay, and Deronrick said I'm going to go?

12 A. Yeah. Dee like, All right, cool. He can stay

13 'til 12 o'clock. But my brother goes home because he's

14 got a wife and kids, so he goes home at the same time

15 every night.

16 Q. What time is that?

17 A. By 8 o'clock, he gone.

18 Q. And so is that about when he left?

19 A. Uh-huh.

20 Q. Is that a yes?

21 A. Yes.

22 Q. So very shortly after you arrived at 8 p.m., he

23 was walking out the door?

24 A. Uh-huh.

25 Q. Is that a yes?

1 A. Yes.

2 Q. And do you know how your brother was going home?

3 A. He had a car.

4 Q. So he was going to drive himself?

5 A. Yes, ma'am.

6 Q. And what happened next?

7 A. D-Cash picked up the man's gun. He was like,
8 Oh, bro, this nice. You got a nice little gun. He played
9 with it a little minute and sat it down.

10 Q. This is Cornelius's weapon?

11 A. Yes.

12 Q. Sat it down where?

13 A. Back on the table in front of him.

14 Q. Is this in the living room?

15 A. In the living room, yes.

16 Q. Okay. What else happened?

17 A. After that, we sat there, smoked a joint. Dee
18 was fittin' -- Cash was fittin' to leave. So I met him in
19 the hallway. I'm like, Bro, don't leave me with him.
20 This is my homeboy. This y'all's homeboy. I already told
21 my brother I think something is wrong with him. So I'm
22 like, Bro, don't leave me here. He's like, All right.
23 Me being on -- you know, I was on Xanies. So,
24 you know, if you ever did Xani, it will make you sleepy.
25 So I go in my room and lay down.

1 Q. You had taken a Xanax?

2 A. Yes.

3 Q. How many Xanax?

4 A. Probably like two of them.

5 Q. Two?

6 A. (Nods head.)

7 Q. Do you know how big the Xanax were?

8 A. They was footballs.

9 Q. Okay. When you say football, like the shape of
10 the Xanax?

11 A. Yeah, the small -- the real small ones.

12 Q. When did you take those?

13 A. Earlier that day. Probably around like
14 4 o'clock that day.

15 Q. So about four hours before you arrived at the
16 apartment.

17 A. Uh-huh.

18 Q. Is that about right?

19 A. Yes.

20 Q. And you said you also smoked some marijuana with
21 everybody?

22 A. Yes.

23 Q. Anybody drinking alcohol?

24 A. Not that night.

25 Q. Okay.

1 A. I don't drink, but not that night.

2 Q. While you had been out in the living room, was

3 anybody doing any kind of drugs?

4 A. No. When I left the living room, Dee was

5 sitting right here, and Cornbread was sitting right here.

6 Q. Are you talking about on the couch, the chair?

7 A. On the couch.

8 Q. So they're on like opposite sides of the couch?

9 A. Opposite. They on two different couches.

10 Q. I see. And did you see Cornbread do any kind of

11 drugs while you were there?

12 A. No.

13 Q. Did you see him smoke any marijuana?

14 A. No.

15 Q. What had he been doing while you were still out

16 in the living room?

17 A. Sitting there quiet.

18 Q. Just like not saying anything like the other

19 times you saw him?

20 A. Like he was just plotting. The whole time,

21 like, he was just thinking what he was going to do.

22 Q. Was he looking at anything?

23 A. Just had this odd look on his face. Just looked

24 around.

25 Q. Just looking around?

1 A. Just quiet. Just looking.

2 Q. okay. what were you and Cash doing?

3 A. Well, Cash is out on the couch. When I left the

4 living room, he was on the couch talking to one of his

5 baby momma. I went in the room. Cornbread was sitting on

6 the couch facing the TV.

7 Q. okay. Was anybody playing the video game still

8 after your brother left?

9 A. No, huh-uh.

10 Q. So nobody played the video game after Deronrick

11 left the apartment. Is that right?

12 A. Huh-uh.

13 Q. Is that a no? Sorry.

14 A. No.

15 Q. okay. Do you know where Cash was going to go

16 when he was going to leave the apartment?

17 A. To be honest, he had like three little

18 girlfriends he was messing with in the apartment complex.

19 So, no, ma'am, I really don't know where he was going.

20 Q. He hadn't said anything to you about what he was

21 going to do?

22 A. No.

23 Q. But you stopped him in the hallway, and you told

24 him don't leave me alone in the apartment?

25 A. Yeah, don't leave me with him. My exact words,

1 Don't leave me with this crazy nigga.

2 Q. What did Cash say back to you?

3 A. He was like, All right, bro. He went and sat on

4 the couch.

5 Q. And that's the last you remember, like what you

6 saw in the living room?

7 A. Uh-huh. Yes.

8 Q. Which bedroom did you go into?

9 A. The first one.

10 Q. Is that the one you would typically sleep in if

11 you were going to stay the night?

12 A. Yes.

13 Q. And why did you stay at the apartment?

14 A. Why I stayed at the apartment?

15 Q. Yes.

16 A. I only came out there because I just left the

17 hood -- I mean, the neighborhood, and I lost so much

18 money. So I came back out here to make money. So I was

19 already going to stay out there so I can make my money

20 back.

21 Q. Like, would you have been answering the phone if

22 you got calls to make plays?

23 A. The door.

24 Q. The door. okay. Would you have heard the door

25 if you were asleep?

1 A. Probably not.

2 Q. So how were you going to make money?

3 A. Well, technically, if he wasn't there, I

4 wouldn't have went in the room. The only reason I went in

5 the room is because I didn't feel comfortable sitting by

6 him. He just gave me this weird feeling, so I took my ass

7 in the room to be honest.

8 Q. Did you say anything to Cash about how he made

9 you feel weird?

10 A. Yeah, I told him and Dee. They said that's

11 their homeboy. That's his personality.

12 Q. Did you take your phone with you into your room?

13 A. Uh-huh.

14 Q. Is that a yes?

15 A. Yes.

16 Q. What kind of phone did you have?

17 A. Metro.

18 Q. Was it just the one phone you had?

19 A. Yes.

20 Q. Do you know how many phones Cash had?

21 A. I think he had about two.

22 Q. Do you remember what they looked like?

23 A. No. No.

24 Q. Okay. How about Deronrick? Do you know how

25 many phones he had?

1 A. About three.

2 Q. Do you remember what the phones were?

3 A. No. They was Metro. I know that.

4 Q. But you had just the one?

5 A. Uh-huh.

6 Q. Is that a yes?

7 A. Yes.

8 Q. And what did you do once you got into the

9 bedroom?

10 A. Well, I called my -- I was on the phone smoking.

11 I guess I ended up falling asleep.

12 Q. Did you contact anybody, like text, call?

13 Anything like that?

14 A. (Shakes head). No.

15 Q. No. Okay. And you just said you guess you fell

16 asleep?

17 A. Yes.

18 Q. What's the next thing that you remember?

19 A. Waking up and my head ringing.

20 Q. And did you wake up in the bedroom?

21 A. Uh-huh. Yes.

22 Q. Tell me what you did next.

23 A. Well, I woke up with my head ringing. But, you

24 know, normally you get up, you got to use the restroom.

25 I'm thinking, you know, head's just ringing. I shake my

1 head, and I walk to the bathroom. As I'm going to the
2 bathroom, I see him coming from the living room going to
3 the kitchen.

4 Q. Who is "him"?

5 A. Cornbread.

6 Q. You said going from the living room to the
7 kitchen?

8 A. Yes.

9 Q. So like walking from one room to the next?

10 A. Yes.

11 Q. What was he doing besides walking?

12 A. I guess he was looking for shit. Because when
13 he seen me -- he seen me, he made me come in the kitchen.

14 Q. How did he do that?

15 A. Gunpoint. Walked me in the kitchen, pushed me
16 on floor. Well, I don't know if he pushed me. I probably
17 fell from loss of blood.

18 Q. Did you know that you were bleeding at that
19 point?

20 A. No, I didn't know I was bleeding until I start
21 talking to him when he asked who I was. Stupid ass
22 question.

23 Q. Which gun was it, if you know, that he was
24 pointing at you?

25 A. Had to be the .40. Same gun he had earlier.

1 Q. Do you know for sure or --
2 A. No. I don't know for sure.
3 Q. Okay. You said he pointed the gun at you. Did
4 he tell you to come into the kitchen?
5 A. He walked me in the kitchen asking me -- he was
6 like, where's at? Where's at? All this stupid shit.
7 Q. What was he asking for?
8 A. Where the drugs was, the money, and all this.
9 Q. Did you tell him?
10 A. I told him the truth. Ain't nothing here. My
11 brother ain't dumb enough to leave nothing here.
12 Q. Did he have anything in his hands besides a
13 firearm?
14 A. Yeah, the shit he was taking from us.
15 Q. What was it that he took from you?
16 A. He took all the guns. He took a little drugs
17 that was there, jewelry.
18 Q. Where did he get the jewelry?
19 A. Me.
20 Q. How did he get it from you?
21 A. Made me take it off.
22 Q. So you were wearing it?
23 A. Yeah, my rings.
24 Q. What rings?
25 A. I had like three, four rings.

1 Q. Was there any other jewelry he took from you?

2 A. No.

3 Q. So like he told you to take it off?

4 A. I don't know. I don't know how I got my chain
5 and bracelet back, but I got it back from the police. I
6 guess it was left at the crime scene. He didn't take
7 that. I guess I took it off before I went to sleep. I
8 remember he made me take my rings off when he had me on
9 the kitchen floor.

10 Q. So the rings you do remember taking off?

11 A. Uh-huh.

12 Q. In the kitchen. Is that right?

13 A. Yes, ma'am.

14 Q. And you said there were three, maybe four rings
15 that you took off?

16 A. Yes.

17 Q. Was there anything else that he took off your
18 person?

19 A. No, ma'am.

20 Q. Okay. Was there anything else of like your
21 personal property that you remember him taking?

22 A. No.

23 Q. You said that he took guns, plural.

24 A. The guns that was already there. I had one. My
25 brother had one.

1 Q. Do you know where your brother kept his gun?
2 A. No.
3 Q. Do you know what kind of gun your brother had?
4 A. I think a nine. I'm not for sure.
5 Q. And yours was a nine. Is that right?
6 A. (Nods head).
7 Q. Is that a yes?
8 A. Yes.
9 Q. And was your gun in the living room drawer?
10 A. Uh-huh. Yes.
11 Q. Okay. And do you know if Darren had a gun with
12 him too?
13 A. I don't know about that night. He was really
14 not no gun person.
15 Q. So when you said your brother's gun, were you
16 talking about Deronrick's gun?
17 A. Yes.
18 Q. And you don't know where he would have kept it?
19 A. No.
20 Q. Do you know what the bag looked like that
21 Cornbread was holding?
22 A. I can't remember. I ain't gonna lie.
23 Q. Well, do you remember if it was like -- seemed
24 like a trash bag or like a backpack or something like
25 that?

1 A. Well, I know the drugs he put in a regular bag.
2 So, yeah, he had went in the cabinet. There was a
3 couple -- like a pound here, little crack there that he
4 took.

5 Q. When you say a pound, a pound of marijuana?

6 A. Uh-huh.

7 Q. Is that a yes?

8 A. Yes.

9 Q. You said like a little bit of crack. So like
10 already packaged into smaller bags?

11 A. If that's how you want to -- inside the other
12 one.

13 Q. I don't know. I have not been in the apartment.

14 A. Well, I know -- I can't tell you exactly what it
15 was, but it wasn't much at the apartment. I can't tell
16 you exactly what he took, but he didn't take nothing worth
17 killing nobody for is what I'm saying.

18 Q. No, no, I understand that. When you said it was
19 a regular bag, do you mean a regular trash bag?

20 A. I guess. A black bag.

21 Q. I guess my question is just, like, did it seem
22 like it was a plastic bag or fabric or leather?

23 A. All I seen was black. I'm blacking out, face
24 full of blood.

25 Q. So you said when you started to speak to him,

1 you realized that you were bleeding?

2 A. Yeah, my tongue. Teeth falling out my mouth.

3 Q. So that's the first time you realized you'd been

4 injured?

5 A. Uh-huh.

6 Q. Is that right?

7 A. Yes.

8 Q. That must have been really scary. I'm sorry.

9 A. (Nods head.)

10 Q. Was he saying anything to you?

11 A. Kept saying, where's at? where's at?

12 Q. Was he asking about money?

13 A. Uh-huh. Yes.

14 Q. Yeah. And was there money in the apartment?

15 A. No. He probably got \$2,000, if that.

16 Q. Where was the money kept when it was in the

17 apartment?

18 A. Wasn't no money kept at the apartment. Like,

19 you had to get the money off us. We make money that day,

20 it's gone. It's a trap. You don't leave money in no trap

21 house.

22 Q. So if you had money, it was just going to be on

23 your person?

24 A. Yeah. Something like, say we made like \$40 that

25 day, \$60 that day. We still here, so it's still gonna be

1 here.

2 Q. Just like in your pocket or whatever?

3 A. Yeah.

4 Q. Do you remember what happened next?

5 A. I remember hearing the door shut.

6 Q. Were you still in the kitchen?

7 A. Uh-huh.

8 Q. Is that a yes?

9 A. Yes. I hear the door shut. I don't know I step
10 over him. I don't even know I step over my brother, my
11 dawg until I turn back around from locking the door. Then
12 I called my brother. He told me to call the police. I
13 didn't call police. I left. I tried to leave, and I end
14 up passing out.

15 Q. You called Deronrick?

16 A. Uh-huh.

17 Q. And Deronrick told you to call the police?

18 A. Yes.

19 Q. Do you remember what you told Deronrick?

20 A. That Cash was dead.

21 Q. Do you remember telling him anything else?

22 A. That's all I kept saying. I don't remember
23 saying nothing else.

24 Q. Okay. You said you -- you remember you did not
25 call the police. You tried to leave the apartment. Is

1 that right?

2 A. Uh-huh. (Nods head).

3 Q. Can you tell me what you did to try to leave the
4 apartment?

5 A. I opened the door. I'm trying to go after I
6 went in the bathroom trying to wipe my face. I just got
7 out of prison. It's not a good look, so I'm outta here.
8 I end up -- I guess they say I passed out when I walked
9 out the door. I don't know. I just remember waking up in
10 the hospital. I don't know.

11 Q. Do you remember the police arriving at all?

12 A. (Shakes head.)

13 Q. No?

14 A. No.

15 Q. So your next memory is waking up in the
16 hospital?

17 A. Yes.

18 Q. Was there anybody with you when you woke up?

19 A. My girlfriend was there when I woke up.

20 Q. Okay. Do you remember where in the hospital you
21 were, like if you were in the ICU or somewhere else in the
22 hospital?

23 A. I don't remember. I was doped up for a couple
24 of days.

25 Q. Do you remember any visits from the police?

1 A. No. I don't remember seeing police at all.

2 Q. Do you remember any visits like while you were

3 in the hospital from the detectives?

4 A. No.

5 Q. Okay. When you -- well, tell me about when you

6 woke up and you saw your girlfriend who was in the

7 hospital with you. That must have come as quite a shock.

8 Were you able to communicate with her?

9 A. I asked her was shit a dream at first, but, you

10 know, my mouth was wired.

11 Q. It was wired shut?

12 A. Yeah. I had a couple of jaw surgeries. It

13 wasn't wired shut, but the jaw surgery, I had it swolled

14 [sic]. So I was like this for a couple of days.

15 Q. Like talking with your mouth closed?

16 A. Uh-huh.

17 Q. Okay. It sounds like that was really difficult

18 for you to communicate.

19 A. (Nods head.)

20 Q. Do you remember having to write in order to

21 communicate with anybody?

22 A. No. I could talk a little bit, but it was just

23 like, hey, like that. (Indicating.) Like clenched teeth.

24 Q. When you woke up and you see your girlfriend

25 there and -- like, tell me about that. Like, did she talk

1 to you? Did she tell you what happened?

2 A. Yeah. She was telling me. First I want to do,
3 I want to go to the mirror. I want to see. I just got
4 shot in the face, so I want to see if I'm still Rodney,
5 which it was shocking that I was. Doctor did a good job.

6 Q. Did you talk to her about -- did you ask her any
7 questions?

8 A. Yes.

9 Q. What kind of questions did you ask her?

10 A. What happened, all this shit.

11 Q. What did she tell you?

12 A. She was just like, You got shot. Homeboy robbed
13 y'all. Your homeboy passed. Stupid shit.

14 Q. Okay. Did anybody from the St. Petersburg
15 Police Department come to see you at the hospital?

16 A. No, I remember.

17 Q. Not that you remember. Is that right?

18 A. (Nods head.)

19 Q. Am I getting that right?

20 A. Yeah. I don't remember seeing no police.

21 Q. Okay. Do you remember any police officers ever
22 showing you photos, anything like that?

23 A. No.

24 Q. Okay. Did you ever, like, go to either the
25 police department or the State Attorney's office to talk

1 to folks?

2 A. This my first time talking to somebody. I
3 wasn't even going to talk to y'all to be honest.

4 Q. Why weren't you going to talk to us? You can be
5 honest.

6 A. Because I know what type of lifestyle I live. I
7 know what comes with it. This snitchin' to be honest.

8 Q. Do you feel like you're snitching?

9 A. I am.

10 Q. Does that make you feel a particular way?

11 A. At first it was. But I talked to my -- his
12 momma and his kids, it ain't right, so I got to do what's
13 right.

14 Q. Are you talking about Darren's family?

15 A. Yeah.

16 Q. Are you still close with them?

17 A. Yes. I just seen his momma yesterday.

18 Q. Yeah. How is she doing?

19 A. (Shakes head.)

20 Q. Not well? I see you shaking your head.

21 A. Yeah, not well.

22 Q. I know that she wants this to be over. Did she
23 say anything about what she wants to see happen?

24 A. She just told me to do what I feel right. She
25 said, You feel like you ain't doing the right thing, don't

1 do it. She knows that's her son. She still like -- she
2 understands street code too, so. . .

3 Q. Does this feel right?

4 A. Yes, it does.

5 Q. Yeah?

6 A. Took me a little minute, but yeah.

7 Q. So it sounds like this is something you've
8 thought about for a long time?

9 A. Cried about, thought about, prayed about.

10 Q. Did you talk to your brother Deronrick about it
11 after all this happened?

12 A. Uh-huh. (Nods head.)

13 Q. Yes?

14 A. Yes.

15 Q. Okay. Did you talk right after you woke up in
16 the hospital?

17 A. Uh-huh.

18 Q. Is that a yes?

19 A. Yes.

20 Q. What did you all talk about?

21 A. Well, he did all the talking. He was just like
22 he's sorry. Felt like it's his fault. You know, he's big
23 brother, so he felt like it was his fault.

24 Q. It sounds like he feels a lot of guilt?

25 A. Yeah.

1 Q. How's he doing?
2 A. He's doing all right. He's doing all right.
3 Q. Yeah? When was last time you spoke to him?
4 A. Yesterday.
5 Q. So he knows you were coming in for your
6 deposition today?
7 A. Yes, ma'am.
8 Q. Did he say anything about it to you?
9 A. No. He just said, Bro, pray about it. You feel
10 like you're doing right thing. He said, Can't nobody be
11 mad at you. So ain't nobody pressuring me to do this.
12 Everybody is like it's up to me.
13 Q. Yeah. So nobody has promised you anything for
14 coming in today?
15 A. No. But when I seen his kids, it's just -- I
16 just felt like --
17 Q. You're talking about Darren's kids?
18 A. Yeah. This could be me. I think I want them --
19 you know, I want my momma to have justice, my kids to have
20 justice for me.
21 Q. I don't know much about his family. How many
22 kids does he have?
23 A. He had five.
24 Q. Five. How old are they?
25 A. I think Denari (phonetic), she's the youngest.

1 She's still in elementary. So he's got like three, four
2 -- three teenagers and two young kids.

3 Q. And you saw them yesterday or some time
4 recently?

5 A. I saw them like two days ago.

6 Q. How are they doing?

7 A. They're doing all right.

8 Q. That's good. Do you remember ever speaking with
9 a detective with curly hair, like a lady detective?

10 A. (Shakes head.) No, ma'am.

11 Q. Do you remember ever being contacted and being
12 told that, like, Cornbread had been arrested?

13 A. I knew he was arrested. I seen it on the news.
14 when he did what he did, I had just got out of the
15 hospital that same day.

16 Q. You were in the hospital for about two weeks,
17 right?

18 A. Yeah, about sixteen days.

19 Q. Okay. That's a long time. And you said you
20 don't remember anybody from law enforcement coming to see
21 you at the hospital?

22 A. At all. These the first people right here.

23 Q. So you don't remember anybody from the State
24 Attorney's office coming to see you?

25 A. Huh-uh. Nobody.

1 Q. And you said you saw on the news Cornbread was
2 arrested. Do you remember, like, what you saw on the
3 news?

4 A. Well, didn't actually know it was him. But, you
5 know, on the news they -- they put on the news that the
6 police got somebody's house surrounded, fittin' to
7 bulldoze somebody's house. So, you know, black people are
8 nosey, so I went. I went to see what was going on. It
9 ended up being him.

10 Q. Did you hear from other people that it was
11 Cornbread's house, Cornbread's family?

12 A. When I pull up to scene, yeah, everybody was
13 letting me know.

14 Q. Oh, so you went there?

15 A. Yeah, I went.

16 Q. Okay. Had you ever been to that house before?

17 A. No.

18 Q. Okay. So you didn't know where he lived before
19 you went there?

20 A. Huh-uh. No.

21 Q. Once you got there, can you tell me about what
22 you saw?

23 A. The police bulldozing his house down.

24 Q. Were there still a lot of police there?

25 A. Yeah, there was a lot.

1 Q. You went that same day?

2 A. Uh-huh.

3 Q. Is that a yes?

4 A. Yes.

5 Q. And did you talk to anybody on the scene, like

6 any police officers?

7 A. No. No, ma'am.

8 Q. Did you talk to any neighbors or any friends?

9 A. No. I didn't get out of the car.

10 Q. Did anybody go with you to the house?

11 A. Yeah, one of my kid's mother.

12 Q. And about how long did you stay there?

13 A. About ten minutes.

14 Q. You said that you had heard from somebody that

15 it was Cornbread -- that it was Cornbread's house?

16 A. Uh-huh.

17 Q. Do you remember who you heard that from?

18 A. It was somebody -- they was just out there

19 talking about it. I just heard. I let the window down,

20 and I heard they said da-da-da-da-da.

21 Q. Did anybody say what had happened in the house?

22 A. No. I ain't know what happened in the house

23 until they put it on the news.

24 Q. So that sounds like it was either later that day

25 or another day?

1 A. Yeah, later that day. He snapped.
2 Q. Yeah. What makes you say that?
3 A. That he snapped?
4 Q. Yeah.
5 A. How you kill your grandma, your great-grandma?
6 She's the soul of the family. Drugs.
7 Q. The night that you had seen him, so like
8 February 1st into February 2nd, had you seen him do any
9 drugs?
10 A. Uh-huh.
11 Q. Yes, you did that night?
12 A. Not that night. Before. I seen him do it one
13 time though.
14 Q. So the night all this happened that you got
15 shot, you had not seen him do drugs?
16 A. No. I didn't see him, no.
17 Q. Okay. Did you believe that he was on drugs for
18 some reason?
19 A. Uh-huh.
20 Q. That sounds like a yes.
21 A. Yes.
22 Q. Tell me why you believe that.
23 A. Because I was using drugs. I'd do Xanax. I'd
24 do fucking ecstasy, all that. So I know it. I know the
25 signs.

1 Q. Tell me about the signs.

2 A. Like scratching, fidgeting. That's all ecstasy

3 side effects. This right here, clenching your jaw.

4 Q. Clenching your jaw?

5 A. Yes.

6 Q. Is that something that you saw Cornelius doing

7 that night?

8 A. Uh-huh. Yes.

9 Q. So the very night that all this happened, you're

10 saying you saw him fidgeting. Is that right?

11 A. The same night he played -- the same night

12 D-Cash played with that gun, that's that same everything.

13 Q. So tell me what you saw Cornbread doing. Was he

14 fidgeting?

15 A. He was just -- like, he had a habit of doing

16 this. (Indicating.)

17 Q. Just kind of crossing and recrossing his

18 fingers?

19 A. Quiet. That was the scary part that you so

20 quiet. Why you so quiet? Quiet people, you thinking.

21 When you quiet, whatchu doing? You thinking. That's why

22 I knew he had this in his head already. You already had

23 plans you was gonna do this.

24 Q. Was he doing anything else that you found

25 bizarre?

1 A. No, not really. Somebody sent Cornbread.

2 Q. What do you mean somebody sent him?

3 A. Somebody sent him to do what he did.

4 Q. Why do you say that?

5 A. Because just my meeting Cornbread, you ain't got

6 no mind. You don't think for yourself. You can just tell

7 you're a crash dummy.

8 Q. So do you think it was another drug dealer?

9 A. Somebody that didn't like D-Cash because he got

10 replaced. My brother replaced him for D-Cash. I'm

11 telling you. Cornbread will tell you that. He'll tell

12 you.

13 Q. So somebody sent Cornbread to kill Darren?

14 A. Somebody sent him to do what he did. I don't

15 know if they sent you to kill him or kill us or rob us,

16 but you did what you did. Because how you got from out

17 there? The girl, whoever this girl was next to the

18 apartment say you jumped in the car. So how you got from

19 out there? You just got out. I'm telling you, it was a

20 Jock.

21 Q. So tell me about the girl in the nextdoor

22 apartment. When did you hear this?

23 A. I can't remember what her name was. Right

24 before Brittany passed. You was asking about Brittany

25 Barnes.

1 Q. Right.

2 A. The girl next door was telling her all this.

3 The girl next door said she heard us. She heard my dawg
4 say, Bro, you gonna kill me? If you ever been in these
5 apartments, the walls is so thin. Like, you can have your
6 TV on two and somebody knows what you watching. The walls
7 is so thin. The girl said she heard me telling him ain't
8 nothing in the house.

9 Q. Do you know this girl's name?

10 A. No, never. I ain't even seen her.

11 Q. So you don't actually remember her yourself from
12 when you were in the apartment. Is that right?

13 A. No. Never seen the girl. She just stayed next
14 door to us. She was telling Brittany all this. And it
15 made sense because Brittany is not there, so how she know
16 we said this? It's exactly what I said.

17 Q. When did Brittany pass away?

18 A. I don't know exactly when she passed away. I
19 think Brittany died two years ago, overdose. I'm gonna
20 say about two years ago, year-and-a-half, two.

21 Q. Okay. And you said it was an overdose?

22 A. Uh-huh.

23 Q. Is that a yes?

24 A. Yes.

25 Q. Did you stay close with her after all this

1 happened?

2 A. Brit?

3 Q. with Brittany, yeah.

4 A. Yeah. we all loved Brittany.

5 Q. And so what you had heard from Brittany was that
6 this girl who lived next door had seen Cornbread jump into
7 a car and leave?

8 A. No. It's a -- the girl heard. The girl heard
9 everything that was going on in the apartment, but it's a
10 dude that was in the parking lot when he jumped in the
11 car.

12 Q. Sorry. Was it a dude like in the car, or it was
13 a dude who told her he saw?

14 A. It's a dude in the parking lot already sitting
15 in his car, late night sitting in his car. He said he
16 watched him get in the white -- in a white truck or some
17 shit or some white car.

18 Q. okay. And Cornbread drove away or somebody else
19 drove away?

20 A. Somebody else drove away.

21 Q. oh, okay. So that's why you think he was sent?

22 A. Yeah, he was sent. Like, if you sit and have a
23 conversation with this man, he ain't got 'em all. He
24 don't. He -- if you know what -- I don't know if you know
25 what a crash dummy is. Like a yes man.

1 Q. Tell me about what you mean by a crash dummy or
2 a yes man.

3 A. Rodney go handle that, go do that, blah, blah,
4 blah. All right, bro. He's a yes man.

5 Q. This is Cornbread?

6 A. Yeah. He's looking to build hisself. He's
7 looking for love. He wanted them niggas. Excuse me.

8 Q. Did you know of anybody who would want Cash or
9 your brother or you to be harmed?

10 A. Jock. I'm telling you, a dude named Jock.

11 Q. Do you know his given name?

12 A. No, I don't know his real name. I just know him
13 by Jock.

14 Q. Was this somebody who was -- well, can you spell
15 that for our reporter?

16 A. J-O-C-K.

17 Q. Okay. What does he look like, if you know?

18 A. Tall. About probably like six-foot, muscular.

19 Q. Was he also a drug dealer?

20 A. Yes.

21 Q. What was he dealing?

22 A. Some of everything.

23 Q. Like the same things that you all were dealing?

24 A. Yes.

25 Q. And how did you know that he was competition?

1 A. It wasn't necessarily competition. It was the
2 point that -- like my brother Dee, well respected in the
3 streets. Everybody loved him. So when he cut Jock off,
4 Jock felt like he replaced him with D -- with D-Cash.

5 Q. with D-Cash. Okay. So it was Jock felt as
6 though Deronrick had --

7 A. Replaced his ass.

8 Q. Right. So this would have been revenge against
9 Deronrick?

10 A. Yeah, it was jealousy. All out of jealousy.
11 Because it all -- like, it don't make no sense.

12 Q. Did you hear anything like from anybody about
13 Jock's involvement in this? Because I know the streets
14 talk.

15 A. He basically came on his own and said it.

16 Q. Did he say it to you?

17 A. Yeah. Well, he said it to somebody else, and it
18 came back.

19 Q. Who did he say it to?

20 A. Some fucking females. Excuse me. Some chick.

21 Q. Who is that?

22 A. I don't know her.

23 Q. Did she tell you?

24 A. Yeah, she told me. Yeah. She told me that it
25 was basically -- it was basically his lick.

1 Q. Like his play?

2 A. Yeah, basically his play, but he couldn't do it

3 because he couldn't get in. So by Cornbread just getting

4 out, that's all -- they all grew up together. So he sent

5 Jock in -- Jock sent him in there to do what he did.

6 Q. Okay.

7 A. I'm telling you.

8 Q. You don't know Jock's given name?

9 A. No. No.

10 Q. Okay. But he's also in South St. Pete?

11 A. Uh-huh.

12 Q. Is that a yes?

13 A. Yes, ma'am.

14 Q. Have you heard anymore about that in the years

15 since?

16 A. No. He ain't trying to be found.

17 Q. So he's disappeared?

18 A. Yeah, he done disappeared.

19 Q. Does Deronrick know all this?

20 A. Yeah, of course. But you know what's crazy?

21 You robbed your own brother, blood brother. Same mommy

22 and daddy. You creaton. This is who you is as a person.

23 You have no loyalty. That's how -- that's how I know you

24 sent him. You robbed your own brother. why you want to

25 rob us? what loyalty you got to us?

1 Q. Are you talking about Bread?

2 A. I'm talking about Jock who sent Cornbread.

3 Cornbread can't think. He don't have nothing up here.

4 Q. Is Jock related to you all?

5 A. No. He's just a friend of theirs.

6 Q. A friend of --

7 A. of Dee and Cornbread and D-Cash. They all grew

8 up together on 16th Street.

9 Q. So like the same age as all of them?

10 A. Yeah.

11 Q. Anything else that you've heard about Jock?

12 A. No, ma'am.

13 Q. And you've heard that he's just disappeared

14 since?

15 A. Yes.

16 Q. The phone that you had, was it damaged that

17 night?

18 A. I don't -- I don't want to lie to you baby. I

19 don't remember.

20 Q. You don't remember?

21 A. No.

22 Q. The phone you have in front of you is not the

23 same phone, is it?

24 A. No. I probably had ten phones already.

25 Q. Yeah. No, it's been four years. That's fair.

1 Do you remember your phone number back then? Was it the
2 same?

3 A. I done had so many seizures, I can't remember my
4 own phone number.

5 Q. So if I asked you about some other phone numbers
6 now, you're not going to remember who those belong to?

7 A. No.

8 Q. Do you remember who "Bae" would have been in
9 your phone at the time, B-A-E?

10 A. Selena. Selena Troupe.

11 Q. Okay. Are you still close with Selena?

12 A. No.

13 Q. Okay. No judgment.

14 A. No, ma'am.

15 Q. These things happen. And in your phone, if
16 somebody was D-E-E, would that be Deronrick?

17 A. Yeah, that would have been my brother.

18 Q. Your brother Deronrick?

19 A. Uh-huh.

20 Q. Is that a yes?

21 A. Yes.

22 Q. Okay. Do you remember ever like giving
23 permission to the police to like get into your phone?
24 Anything like that?

25 A. (Shakes head.)

1 Q. Is that a no?

2 A. No.

3 Q. Do you remember showing your phone to anybody

4 who might have been interested, the police, prosecutors?

5 A. No.

6 Q. And you said that there were some things that

7 were returned to you by the police?

8 A. Yeah. They gave me a bloody necklace and a

9 bracelet.

10 Q. Okay. Did you recognize those things?

11 A. They was mine.

12 Q. And how did you know that they were yours?

13 A. Because it's my property.

14 Q. Did you have to show them proof that they were

15 yours? Like, did you provide receipts?

16 A. No. They just called me down to the police

17 station to get it.

18 Q. Do you remember providing them with like photos

19 that you had owned them before?

20 A. Not that I know of.

21 Q. Not that you remember?

22 A. No.

23 Q. And, look, I know it's been a long time. That's

24 fair. If I showed you a photo of some rings, do you think

25 you would recognize them?

1 A. Yeah. Definitely the one I got from D-Cash that
2 night, definitely.

3 Q. Okay. So these are -- this is a photo of three
4 rings.

5 MS. SEIFER-SMITH: Tammy, I'll send this to you.

6 A. I just had got that same night from D-Cash.

7 Q. Are you pointing at the one that looks kind of
8 like a basketball?

9 A. That one right there. Yes, ma'am.

10 Q. Is that supposed to be a basketball?

11 A. I don't know what it was. He bought it from my
12 brother, and I bought it from him.

13 Q. And D-Cash gave it to you that very night?

14 A. I bought it from him that night.

15 Q. Okay. And what about the other two?

16 A. They -- I bought them at a shopping mall, I
17 think. I think I got them at a shopping mall.

18 Q. Are those yours?

19 A. All three of them are mine.

20 Q. And are these the rings that you were talking
21 about when you said that Cornbread told you to take your
22 rings off?

23 A. Uh-huh.

24 Q. Yes?

25 A. Yes.

1 Q. okay. And were these returned to you?

2 A. No.

3 Q. So as far as you know, somebody still has them,

4 police or otherwise?

5 A. Yeah. I think they were saying they evidence or

6 something. I'll probably get them back after the trial.

7 I low-key don't even think I want them.

8 Q. Once you bought that big one from Cash, were you

9 wearing it?

10 A. Uh-huh.

11 Q. Is that a yes?

12 A. Yes.

13 Q. Do you remember if you wore them on your left,

14 on your right, on both hands?

15 A. (Indicating.)

16 Q. Everything on your left hand?

17 A. All three of them. I had a pinky ring on this

18 side.

19 Q. On your right hand?

20 A. Yeah, but I didn't have it on that night.

21 Q. So the pinky ring like never disappeared?

22 A. No. I still got it.

23 Q. okay. And the jewelry that you described, like

24 the necklace and the bracelet was already returned to you?

25 A. Yes, a long time ago.

1 Q. okay. Was there any other jewelry that was
2 missing as far as you were concerned that you know of?

3 A. My earrings.

4 Q. So earrings were taken from you?

5 A. I ain't never get them. I don't know what
6 happened to them. I don't know if I took them off that
7 night to go to bed or he took them. I don't care. I
8 don't want them, so --

9 Q. So they're gone, but you don't know if Cornbread
10 took them or if they were just left at the apartment?

11 A. Yeah, just left at the apartment.

12 Q. So you described to me your rings were taken and
13 two firearms from the apartment were taken?

14 A. Uh-huh.

15 Q. And drugs?

16 A. Uh-huh.

17 Q. Was there anything else that you know was taken?

18 A. No, ma'am.

19 Q. okay. Did you ever go back to the apartment?

20 A. No. Oh, yeah, I went back one time. One time.

21 Q. Tell me about that.

22 A. I went back to get -- because I had cleaned the
23 room out, but I had Brittany do it. I ain't really step
24 in there. I was out there. I didn't go inside. I just
25 came to the door and got my stuff. She was still cleaning

1 the blood off the floor.

2 Q. So you didn't go back inside the apartment?

3 A. No.

4 Q. Did she -- did she say anything like she found
5 anything of yours in the apartment?

6 A. Oh, no.

7 Q. And what kind of property did you take from the
8 apartment?

9 A. Property?

10 Q. Yeah. What did she get for you out of the
11 apartment?

12 A. Just like clothes, shoes. Little stuff I left
13 there. No more than clothes or shoes.

14 Q. Was anything returned to Darren's family?

15 A. That I don't know. I'd be lying to you.

16 Q. No, that's fine. Do you know what your --
17 like what the extent of your injuries were as a result of
18 the shooting?

19 A. Well, I know I got shot right here.

20 Q. That's your right cheek?

21 A. Yeah. I had my tongue stitched back on. I got
22 all my teeth knocked out. I had a trachea, feeding tube,
23 couple of jaw surgeries. All this numb under here. No
24 feeling. That's about it.

25 Q. Do you feel like you've recovered?

1 A. oh, yeah. I'm good. You know, I have my little
2 problems but --

3 Q. What kind of problems?

4 A. You know, headaches. Then sometimes --

5 Q. Is that new?

6 A. No.

7 Q. okay. Is that like associated with the seizures
8 or anything else, or do you think it's associated with the
9 shooting?

10 A. I think it's got more to do with the shooting.
11 The seizures I've been dealing with since I was fifteen,
12 so I know all the side effects. I don't get headaches.

13 Q. How often do you get the headaches?

14 A. I go through probably like two a day hoping they
15 don't turn to migraines.

16 Q. Do you sometimes get migraines?

17 A. Yeah. Yes, ma'am.

18 Q. I know migraines can be really debilitating.
19 Has it been very hard for you to concentrate, to speak, do
20 things?

21 A. Yeah. I sit down somewhere for a minute. I sit
22 down for a minute.

23 Q. Are you still in any kind of treatment for your
24 injuries?

25 A. No. I go to therapy, but, you know, it's all

1 right. I'm doing better.

2 Q. Like physical therapy or like talk therapy?

3 A. Mental therapy.

4 Q. Fair. Are you finding it helpful?

5 A. Yes, very. It's good talking to people that
6 don't know you. It's easier for some reason.

7 Q. I agree.

8 A. I swear. That lady is like my best friend, and
9 she don't even know it.

10 Q. When did you start going to therapy?

11 A. I've been going about four years now.

12 Q. Did like any state agencies help set you up with
13 that?

14 A. My momma did. Know what I'm saying? My momma.

15 Q. Mommas are smart ladies.

16 A. Yeah. She felt like I --

17 Q. You could benefit from it?

18 A. Yeah.

19 Q. She wasn't wrong, was she?

20 A. No, she wasn't.

21 Q. Have you heard anything from Cornbread since all
22 this happened?

23 A. He sent a message.

24 Q. Tell me about that.

25 A. It's funny. He sent a message and told me -- he

1 said something about don't take the stand or something he
2 said. He sent a message through a homeboy that just got
3 out of jail.

4 Q. When was that?

5 A. Probably like a month ago.

6 Q. How did the message come to you? Like somebody
7 came to talk to you?

8 A. Yeah, somebody came. Pulled up on me, like,
9 Rod, da-da-da-da.

10 Q. Who was that?

11 A. I ain't gonna -- his name is James. Some dude
12 named James.

13 Q. Some dude named James. And what did James say
14 to you?

15 A. That Cornbread told me to say it wasn't me --
16 wasn't him or some dumbass shit. That don't make no
17 sense.

18 Q. What did you -- what did you do when you heard
19 that?

20 A. I laughed honestly. I bust out laughing. I
21 wish I could have went to the county and beat his ass to
22 be honest.

23 Q. Was that the only time that you heard anything
24 from him?

25 A. Yeah. Yes, ma'am.

1 Q. So like no postcards? Letters?

2 A. No.

3 Q. No other messages through anybody else?

4 A. Huh-uh.

5 Q. Is that a no?

6 A. No. Yeah, after my brother beat him up, he

7 ain't going to say nothing else to me.

8 Q. Did Deronrick beat Cornbread up?

9 A. Uh-huh. My brother Rico beat him up in the

10 county.

11 Q. I see. How did you hear about that?

12 A. Who didn't hear about it?

13 Q. When was that?

14 A. I think about a year ago. I think he broke his

15 arm, broke his ribs or something.

16 Q. Was that like -- did you ask Rico to do that?

17 A. No.

18 Q. Rico just did it for you out of love?

19 A. He's a protector. He's more like the protector

20 of the family. Dee was the money. I was the brains.

21 It's just crazy.

22 Q. So Rico is your blood brother?

23 A. Yeah, same momma, same daddy.

24 Q. Okay. Did you hear anything from Rico about

25 that? Did you actually talk to Rico about it?

1 A. Yeah.

2 Q. What did Rico say?

3 A. He had fun beating his ass.

4 Q. Did he say that he'd ever heard Bread say

5 anything to him?

6 A. (Shakes head.)

7 Q. Bread never talked about any of this?

8 A. Too many people not going to say nothing crazy

9 to Rico.

10 Q. Did you ever hear anything from his family?

11 A. His cousin. They -- you know I wasn't going to

12 do this, right? I wasn't even going to be here. This

13 wasn't even my plan to be honest. All the people called

14 me and told me I'm trippin', that I need to come to court

15 because he deserved what the fuck he deserves. Excuse me.

16 Q. Which cousin was this?

17 A. I don't know his family. I just -- Facebook.

18 Q. So somebody reached out to you on Facebook?

19 A. Facebook. Yes, ma'am.

20 Q. Did you review anything in preparation for our

21 conversation today? Like, did the State give you any kind

22 of documents for you to read? Did you watch anything?

23 A. Yeah, I got papers from somebody. That was you?

24 MR. BRADLOW: (Nods head).

25 A. Yeah. Basically, it was recounting what I said,

1 like statement. We already talked. Seemed like I was
2 just rereading.

3 Q. Was it like a statement that you gave?

4 A. Yeah. It was questions that I answered it
5 seemed like.

6 Q. Was there -- like, do you remember being in a
7 room where there was another court reporter, somebody like
8 Tammy?

9 A. To be honest, no.

10 Q. You don't remember that?

11 A. I don't remember none of that.

12 Q. So when you were given that document by
13 Mr. Bradlow, did that jog your memory in any way?

14 A. Yeah. I still don't remember sitting there
15 talking to nobody, but that's me. I can tell how I said,
16 how it's worded and everything. I can hear myself reading
17 it.

18 Q. Okay. So that sounded like you?

19 A. Yes.

20 Q. Okay. But you just don't have a recollection of
21 having had that conversation it sounds.

22 A. I was heavily medicated.

23 Q. When you were released from the hospital were
24 you still on a lot of medication?

25 A. No, not really. I heal fast too. Not really.

1 Q. That's great.

2 A. It was crazy because I was expecting to have
3 pain, but I didn't go through no pain. I didn't even feel
4 it. That was crazy.

5 Q. Do you remember any of the medications that you
6 were on?

7 A. (Shakes head.)

8 Q. No?

9 A. I remember when I got out of the hospital after
10 them sixteen days, them people gave me the trache, and
11 they told me I couldn't eat. I was all right. I was -- I
12 was shocked that I was -- I bounced back so fast.

13 Q. Did you ever hear anything else on like Facebook
14 or other social media from anybody about your involvement
15 in this case or the other case?

16 A. (Shakes head.) No, ma'am.

17 Q. Did you ever hear anything from like anybody on
18 the streets about the other case?

19 A. (Shakes head.)

20 Q. Is that a no?

21 A. No.

22 MS. SEIFER-SMITH: I don't think I have any
23 other questions. Ms. Russell.

24 MS. RUSSELL: I have a few.

25 EXAMINATION

1 BY MS. RUSSELL

2 Q. First, I just want to start by saying thank you
3 for coming today.

4 A. Yes, ma'am.

5 Q. I know it's really important for the State and
6 for us, and we really appreciate that you're here. Let me
7 ask you, what kind of seizures do you have? Are they the
8 kind when you fall down on the floor and shake a lot, or
9 is it the kind when you're silent and still?

10 A. Silent and still. Like, I ain't going to be
11 completely still but I freeze still. I can talk myself
12 out of it. Yeah.

13 Q. But it's one of those where your sort of brain
14 turns off --

15 A. Yeah.

16 Q. -- and you're almost comatose?

17 A. Yeah. Just out for like three, four minutes.

18 Q. And you don't have the kind where you fall on
19 the floor and shake uncontrollably?

20 A. No. No, ma'am.

21 Q. Can you tell me about your T-shirt?

22 A. Oh, this my daughter momma. She died low blood
23 pressure eating cornstarch. Crazy.

24 Q. How old was she?

25 A. Thirty-four. Would have been thirty-five

1 October.

2 Q. And when was that?

3 A. A couple of months. February 22nd.

4 MS. RUSSELL: I'm sorry. All right. That's all
5 I have.

6 MR. MCGREEN: No questions from me.

7 MS. SEIFER-SMITH: State, any questions?

8 MR. KOSKINAS: That's it. You're all set?

9 THE DEONENT: All right.

10 MS. SEIFER-SMITH: Just one second. Sorry.

11 EXAMINATION

12 BY MS. SEIFER-SMITH

13 Q. Mr. Green, have you understood all the questions
14 we've asked you today?

15 A. Yes, ma'am.

16 Q. Have you had an opportunity to answer everything
17 fully and completely?

18 A. Yes, ma'am. But I don't want y'all to think
19 that these seizures got anything to do with it. I might
20 forget a lot of shit, but I'll never forget this night.
21 I'm telling you right now. He did it. I'll never forget
22 it.

23 Q. Have you -- is there anything that you want to
24 add in terms of our conversation?

25 A. (Shakes head). No, ma'am.

1 Q. okay. If something comes up after you leave,
2 like, you know, something jogs your memory, you feel like
3 you left something out from our conversation or anything
4 else, like you remember having a conversation with police,
5 whatever it might be, if you could be so kind as to give a
6 call to the State Attorney's office or to my office to let
7 us know. Is that fair?

8 A. Yes, ma'am. But I really don't remember talking
9 to no police.

10 Q. okay. No, that's fair.

11 A. I must have really been doped up because I don't
12 remember my brother and them coming to hospital. I don't
13 remember nobody being there. I had to be heavily sedated
14 I guess. My momma, everybody said they came to see me,
15 but I don't remember seeing nobody.

16 Q. Not until you woke up and your girl was there?

17 A. Until I woke up and then I seen her.

18 Q. Do you remember ever seeing any of your other
19 family members at the hospital?

20 A. My brothers came.

21 Q. So you do remember that but later?

22 A. Yeah, later. Like, they said I was sedated for
23 seven days or some shit.

24 Q. okay. If something jogs your memory though, you
25 have a new memory of something --

1 A. Uh-huh.

2 Q. -- would you be so kind as to reach out to
3 either their office or mine?

4 A. I will. Yes, ma'am.

5 Q. I'm going to conclude the deposition, and I'll
6 reserve your right to read. Okay?

7 A. All right.

8 MS. SEIFER-SMITH: Thank you very much.

9 (Deposition concludes at 11:29 a.m.)

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1 COUNTY OF PINELLAS)

2 STATE OF FLORIDA)

3 CERTIFICATE OF OATH

4

5 I, the undersigned authority, certify that RODNEY
6 GREEN personally appeared before me and was duly sworn.

7 Witness my hand and official seal this 12th day of
8 August, 2025.

9

10 Tamara M. Pacheco

11 Tamara M. Pacheco, RPR
12 COMMISSION # 474485
13 EXPIRES: March 30, 2028

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1 CERTIFICATE OF REPORTER

2 STATE OF FLORIDA)

3 COUNTY OF PINELLAS)

4
5 I, Tamara M. Pacheco, certify that I was authorized
6 to and did stenographically report the Deposition of
7 RODNEY GREEN; that a review of the transcript was
8 requested; and that the transcript is a true and complete
9 record of my stenographic notes.10 I further certify that I am not a relative, employee,
11 attorney or counsel of any of the parties, nor am I a
12 relative or employee of any of the parties' attorney or
13 counsel connected with the action, nor am I financially
14 interested in the action.15 Tamara M. Pacheco

16 Tamara M. Pacheco, RPR

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1 ERRATA SHEET

2 IN THE CASE OF: STATE OF FL v. CORNELIUS WHITFIELD

3 NAME OF DEONENT: RODNEY GREEN

4 CASE NUMBER: 21-01099CFANO

5
6 Please read the transcript of your deposition. If
7 you feel you need to make corrections, please note on this
7 page. DO NOT mark on the transcript itself.
8 Sign and date the transcript below.

9 PAGE LINE ERROR/AMENDMENT REASON FOR CHANGE

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