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IN THE CIRCUIT COURT FOR PINELLAS COUNTY, FLORIDA
21-01099-CF
SECTION M

STATE OF FLORIDA,
Plaintiff,
vs.
CORNELIUS TREVON WHITFIELD
Person ID: 1566510,

Defendant.

_____ /

DEPOSITION OF: FRED DAVID ALPHONSE

DATE: February 21, 2023

TIME: 9:19 a.m. to 9:33 a.m.

PLACE: County Justice Center
14250 49th Street North
Room 1100
Clearwater, Florida

PURSUANT TO: Notice by counsel for
Defendant for purposes of
discovery, use at trial
or such other purposes
as are permitted under
the Florida Rules
of Civil Procedure

BEFORE: Nathan F. Perkins, RDR
Notary Public, State of
Florida at Large

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APPEARANCES:

THEODORA TAKTIKOS-DANZIG, ESQUIRE
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E X H I B I T S
(None marked)

1 FRED DAVID ALPHONSE,
2 the witness herein, being first duly sworn on oath, was
3 examined and deposed as follows:

4 DIRECT EXAMINATION

5 BY MS. MANUELE:

6 Q. Could you please state your name and
7 occupation for the record?

8 A. Fred Alphonse. I'm a firefighter with St.
9 Pete Fire and Rescue.

10 Q. How long have you been with St. Pete Fire and
11 Rescue.

12 A. About seven years.

13 Q. Any other work in the same kind of field,
14 paramedic, EMT?

15 A. Yes. Paramedic at Tampa Community Hospital
16 ER.

17 Q. And when was that?

18 A. Eight years.

19 Q. For eight years?

20 A. How long I worked there?

21 Q. Yeah. How long were you at --

22 A. Eight years. They have nothing to do with
23 each, so this, Tampa is -- the other side is the ER. So
24 is that what you wanted to know, how long I worked in
25 the ER for?

1 Q. You said you were a paramedic in Tampa
2 Community Hospital?

3 A. Hospital, yeah.

4 Q. For eight years?

5 A. Yes.

6 Q. Okay. And then you said that had nothing to
7 do with what, though?

8 A. With St. Pete Fire Rescue. That's two
9 separate jobs.

10 Q. Right. But I had asked about other work in
11 the same kind of --

12 A. Oh, okay. All right. Yeah, same field, yes.

13 (The reporter requested the parties speak one
14 at a time.)

15 BY MS. MANUELE:

16 Q. Have you ever given a deposition before?

17 A. No, I have not.

18 Q. Okay.

19 A. Okay.

20 Q. So basically I'm going to ask you -- we're
21 here because you have been listed as a witness --

22 A. Okay.

23 Q. -- in the State of Florida vs. Cornelius
24 Whitfield --

25 A. Okay.

1 Q. -- regarding the homicide the Darren Barnes,
2 attempted homicide of Rodney Green that occurred
3 February 1st, February 2nd, 2021.

4 A. Okay.

5 Q. Okay. I'm going to ask you questions about
6 your involvement in the case, observations you made, and
7 maybe have you explain some of the things in report for
8 me.

9 A. Okay.

10 Q. We can't talk at the same time because we have
11 a record going.

12 A. Yeah. Okay.

13 Q. If I -- if you don't understand my question,
14 please let me know. If you -- and I will rephrase it.
15 If you don't know the answer to something or you don't
16 remember, those are completely acceptable answers. And
17 if you say "uh-huh" or "uh-uh" or shake your head, I may
18 follow-up with "Is that a 'yes' or is that a 'no'" --

19 A. Okay.

20 Q. -- not to give you a hard time --

21 A. Yeah.

22 Q. -- we all understand what you are saying, but
23 just so that we have a good record.

24 A. Okay.

25 Q. Okay? And so when did you tell me you started

1 working with St. Peter Fire and Rescue?

2 A. October 5th, 2015.

3 Q. Okay. And on February 2nd of 2021, did you
4 guys -- did you respond to a call out at -- in Emerald
5 Pointe Apartments?

6 A. Yes.

7 Q. Okay. I'm sorry, I can't find the address on
8 here.

9 A. Okay.

10 Q. Who all would have had arrived, like, with
11 your unit?

12 A. My unit Rescue 7 and the Sunstar unit.

13 Q. And so is Rescue 7, would that be like one
14 truck or one --

15 A. Fire Rescue.

16 Q. Fire Rescue?

17 A. Yeah.

18 Q. So you guys were all in the same vehicle then?

19 A. No. Two separate vehicles. It's my and my
20 partner that's outside, he was in the vehicle with me.

21 Q. Okay.

22 A. And Sunstar, there's usually a paramedic and
23 an EMT in their own vehicle.

24 Q. Oh, gotcha. I'm sorry. But for -- and is the
25 whole -- is both parts of that considered Rescue 7, or

1 is just St. Pete is the Rescue 7?

2 A. No. It's the Rescue 7 St. Pete --

3 Q. Yeah.

4 A. -- and Sunstar --

5 Q. So with Rescue 7, who all was with you?

6 A. It's me and William Fletcher.

7 Q. Okay. And did you guys arrive at, like, prior
8 to, at the same time, or after Sunstar?

9 A. Well, before we arrive, when there's a
10 situation like that, PD has to be on scene first to give
11 us the clearance to arrive. So we both were staged
12 until we got the okay to come on the scene.

13 Q. Okay. And when you say "staged," you mean
14 just stopped right nearby?

15 A. Yeah. Well, stopped a couple of blocks out
16 until they make sure the scene is clear and safe for us
17 to come on there and assist the patient.

18 Q. Okay. And once the PD -- by "PD" you mean the
19 police department, right?

20 A. Yes.

21 Q. Once the PD clears for you guys to come on, do
22 you and Sunstar go together at the same time?

23 A. Yes. Whoever arrives on scene, first yeah, we
24 just drive towards the scene.

25 Q. Okay. In this particular circumstance, do you

1 recall if you guys went, like, at the same time?

2 A. I can't remember who arrived there first, but
3 we weren't too far behind each other.

4 Q. Gotcha. When you arrived on scene, what do
5 you recall seeing?

6 A. The one patient was outside holding his cheek
7 just screaming, or I mean words I can't remember.

8 Q. Fair.

9 A. But I'm pretty sure he was saying he was shot
10 in the face and his friend was dead. But he was pretty
11 hysterical.

12 Q. And would you have been involved in providing
13 any treatment to him right there outside?

14 A. Well, we had to start triage. So once we saw
15 that he was awake and all his face, we went inside to
16 look for the other patient.

17 Q. Were the -- when you went inside to look for
18 the other patient, at what state did you find him in?

19 A. Deceased.

20 Q. Was he very -- was it -- was he obviously
21 deceased?

22 A. Yes. He had a bullet wound in the back of his
23 neck, from what I remember.

24 Q. Did anybody attempt to perform any life saving
25 measures on the individual with the bullet wound to the

1 back of the head?

2 A. Oh, no. He had pretty obvious --

3 Q. Gotcha. Once you know that that patient is
4 obviously deceased, what do you then do?

5 A. We have to go back and assist the other
6 patient.

7 Q. Okay. And I'm looking at a patient care
8 report, EMS run 1017365. Do you have a copy of that?

9 A. Yes.

10 Q. Okay. Have you had a chance to review it?

11 A. Yes.

12 Q. This narrative portion, do you know -- do you
13 write that or does Mr. Fletcher write that?

14 A. Fletcher.

15 Q. Fletcher. Okay. And then at the end there is
16 a place for you to initial; is that correct?

17 A. Yes.

18 Q. Is that essentially you initialling saying you
19 agree?

20 A. Witnessed everything that happened, yeah.

21 Q. Gotcha. Okay. In reviewing this run report,
22 was there anything that stuck out to you as being
23 inaccurate or different from what you recall?

24 A. No. It just refreshed my memory. At first it
25 was pretty foggy and it just kind of brought back

1 everything, what I saw that night. So --

2 Q. Gotcha. When you indicate -- or when the
3 report indicates that the patient is alert and tracks
4 St. Pete Fire Rescue personnel, what does that mean?
5 I'm sorry. Looking at the third paragraph of the
6 narrative.

7 A. I am unaware of that. But alert is just
8 saying that the patient is -- it's pretty much saying
9 that he was awake and oriented and able to talk.

10 Q. Okay. Do you ride in the ambulance while the
11 patient is transported to the hospital?

12 A. In this case Fletcher did.

13 Q. Okay. And so then you guys, you and Fletcher
14 arrive in the same vehicle, Fletcher leaves with Sunstar
15 ambulance --

16 A. Yes.

17 Q. -- and then you, do you respond to the
18 hospital or did you go on, just go to a different call?

19 A. Go to the hospital.

20 Q. You followed?

21 A. Yes.

22 Q. Gotcha. So as far as any -- looking at this
23 third paragraph where it says, the second, line R7 start
24 16 G I.V. --

25 A. Uh-huh (Affirmative response).

1 Q. -- is that treatment that would have occurred
2 then in the ambulance, or was that something you were
3 present for?

4 A. I can't remember.

5 Q. Okay. When -- the last line of that
6 narrative, or last sentence. I'm sorry. R7 transfers
7 patient care to Sunstar for further medical evaluation
8 and care.

9 A. Uh-huh (Affirmative response).

10 Q. Does that mean that at some point you guys --
11 Sunstar is still with the patient and Fire and Rescue is
12 no longer involved?

13 A. I think that was an error on his part, because
14 he wrote in -- I'm pretty sure he probably meant the
15 report probably in that case. But yeah, you'd have to
16 ask Fletcher.

17 Q. Okay. Is that what that would normally mean,
18 the transfer of patient care, would that suggest that --

19 A. That's what it suggests. But yeah, he rode in
20 to the hospital with that patient.

21 Q. Do you know if it Sunstar would have continued
22 to do any care at the hospital, or would he immediately
23 be transferred over to --

24 A. In that case it's hit or miss, depending on
25 how significant it is. But normally we do transfer care

1 to the doctors and the nurses.

2 Q. Okay.

3 A. That's protocol essentially.

4 Q. Okay. In this case do you specifically
5 remember?

6 A. No, I don't.

7 Q. Okay. Do you know -- the information that you
8 get, like going back to the first line of the narrative
9 where it says "Dispatch received information from
10 caller. "

11 A. Uh-huh (Affirmative response).

12 Q. Do you get any information about who that
13 caller is?

14 A. Depending on how much information the caller
15 gives --

16 Q. Okay.

17 A. -- and what exactly they say. It's usually
18 verbatim. Like, where it says "My friend is dead,"
19 that's what we were telling dispatch. So that's what we
20 were getting.

21 Q. In this particular case do you know who the
22 caller was?

23 A. No, I wouldn't know. I could only assume
24 that's the patient that was outside holding his face.

25 Q. Okay.

1 A. Because he was the only other person that was
2 there, so --

3 Q. Do you recall seeing any other lay witnesses
4 on the scene?

5 A. No, I don't.

6 Q. Okay. As far as you know, had you ever
7 responded to any other calls out at this apartment
8 complex before?

9 A. No.

10 Q. Under the -- looking at the disposition part
11 of the report, I think the second to last page -- the
12 page numbers are chopped off.

13 A. Yes.

14 Q. Maybe a 3. There's initial patient acuity,
15 and it says "Red, which is critical or unstable." What
16 does that mean?

17 A. It's pretty much that the patient was very
18 critical.

19 Q. Meaning there is a good possibility they
20 wouldn't survive or --

21 A. Yes. So usually a trauma alert. So because
22 his -- I mean, he got shot in the face, so yeah, that's
23 what it means.

24 Q. Any other specific -- in looking at the
25 Sunstar report, there's a statement that the patient

1 stated "They shot him, they shot my brother." Do you
2 have any recollection of hearing that?

3 A. No.

4 Q. Okay. As far as any statements that you
5 recall Mr. Green saying, have you discussed those
6 with -- basically what you said, you thought he was
7 screaming and you can't recall exactly what?

8 A. I can't recall. It was just a lot of -- he
9 was saying a lot of words, whatever --

10 Q. Okay.

11 A. -- so it's hard to even think of what he was
12 saying.

13 Q. Anything in particular that stuck out that you
14 would feel comfortable testifying that Mr. Green said?

15 A. Just "He shot me, he shot me." But he never
16 specified names or anything whatever. But he was just
17 hysterical and just focused on the fact that he got
18 shot.

19 Q. Okay. And you recall him saying "he" versus
20 "they"?

21 A. Yes.

22 Q. Okay. And when would have that have --
23 statement have been made?

24 A. As we were walking up.

25 Q. Okay. So outside the apartment complex?

1 A. Outside, yeah.

2 Q. Okay.

3 A. Yeah. He was never inside. He was outside.

4 Q. And that's when law enforcement officers were
5 on scene already?

6 A. Yeah, they were on scene, yeah.

7 MS. MANUELE: Okay. All right. I don't have
8 any other questions. One of the prosecutors might
9 have a couple questions for you.

10 MS. TAKTIKOS-DANZIG: I don't, no.

11 MS. MANUELE: All right.

12 (Concluded at 9:33 a.m.)

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CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

I, the undersigned authority, certify that
Fred David Alphonse, personally appeared before me and
was duly sworn.

WITNESS my hand and official seal this 26th day
of September, 2023.



Nathan F. Perkins, RDR
Notary Public - State of Florida
My Commission Expires: 7/18/2025
Commission No. HH 122841

REPORTER'S CERTIFICATE

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

I, Nathan F. Perkins, Registered Diplomate Reporter, certify that I was authorized to and did stenographically report the deposition of Fred David Alphonse; that a review of the transcript was requested; 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 26th day of September, 2023.



Nathan F. Perkins, RDR

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WITNESS' SIGNATURE PAGE

PLEASE ATTACH TO THE DEPOSITION OF FRED DAVID ALPHONSE
TAKEN ON FEBRUARY 21, 2023, IN THE CASE OF STATE OF
FLORIDA VS. CORNELIUS TREVON WHITFIELD.

Job No. FLA5759448

PAGE LINE CORRECTION AND REASON THEREFOR

I HAVE READ THE FOREGOING PAGES AND, EXCEPT FOR ANY
CORRECTIONS OR AMENDMENTS INDICATED ABOVE, I HEREBY
SUBSCRIBE TO THE ACCURACY OF THIS TRANSCRIPT.

20
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FRED DAVID ALPHONSE

DATE

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WITNESS TO SIGNATURE

DATE

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September 26, 2023

Mr. Fred David Alphonse
C/O: Theodora Taktikos-Danzig, Esquire
County Justice Center
eservice@flsa6.gov

Re: 2/21/2023 deposition of Fred David Alphonse
State of Florida vs. Cornelius Trevon Whitfield

Dear Sir/Madam:

This letter is to advise that the transcript of the above-referenced deposition has been completed and is available for review. Please email the signed errata sheet to transcripts-fl@veritext.com or sign below to waive review of this transcript.

It is suggested that the review of this transcript be completed within 30 days of your receipt of this letter, as considered reasonable under Federal Rules*; however, there is no Florida Statute to this regard.

The original of this transcript has been forwarded to the ordering party and your errata, once received, will be forwarded to all ordering parties.

Sincerely,

Nathan F. Perkins, RDR
Veritext Legal Solutions

Cc: Jessica Manuele, Esquire

WAIVER:

I, _____ hereby waive the reading & signing of my deposition transcript.

Deponent Signature

Date

*Federal Civil Procedure Rule 30(e)/Florida Civil Procedure Rule 1.310(e)

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FLORIDA RULES OF CIVIL PROCEDURE

Rule 1.310

(e) Witness Review. If the testimony is transcribed, the transcript shall be furnished to the witness for examination and shall be read to or by the witness unless the examination and reading are waived by the witness and by the parties. Any changes in form or substance that the witness wants to make shall be listed in writing by the officer with a statement of the reasons given by the witness for making the changes. The changes shall be attached to the transcript. It shall then be signed by the witness unless the parties waived the signing or the witness is ill, cannot be found, or refuses to sign. If the transcript is not signed by the witness within a reasonable time after it is furnished to the witness, the officer shall sign the transcript and state on the transcript the waiver, illness, absence of the witness, or refusal to sign with any reasons given therefor. The deposition may then be used as fully as though signed unless the court holds that the reasons given for the refusal to sign require rejection of

the deposition wholly or partly, on motion under
rule 1.330(d)(4).

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES
ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.
THE ABOVE RULES ARE CURRENT AS OF APRIL 1,
2019. PLEASE REFER TO THE APPLICABLE STATE RULES
OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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