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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: KENNETH MAURICE SEAY, III  
DATE: February 21, 2023  
TIME: 10:17 a.m. to 10:31 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  
THOMAS KOSKINAS, ESQUIRE  
County Justice Center  
14250 49th Street North  
Clearwater, Florida 33762  
Attorneys for Plaintiff

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Attorney for Defendant

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E X H I B I T S  
(None marked)

1                   KENNETH MAURICE SEAY, III,  
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.    Officer Kenneth M. Seay, III, with the St.  
9           Petersburg Police Department.

10                  Q.    How long have you been with St. Pete PD?

11                  A.    Since 2019.

12                  Q.    Any prior law enforcement experience?

13                  A.    No.

14                  Q.    I feel like, is there another with the II or  
15           Junior with St. Pete PD?

16                  A.    No. Just me.

17                  Q.    It seems like I have seen your name way longer  
18           than four.

19                  A.    (Nods negatively).

20                  Q.    Three years. Well, my name is Jessica  
21           Manuele. We here because you've been listed as a  
22           witness in the State of Florida versus Cornelius  
23           Whitfield regarding a homicide and attempted homicide  
24           that occurred back on February 1st or February 2nd of  
25           2021. Are you familiar generally with the

1 circumstances?

2 A. Vaguely.

3 Q. Okay.

4 A. Most likely I'll have to refer to my report.

5 Q. No problem. And that was going to be my next  
6 question. Do you write a supplemental report detailing  
7 your involvement?

8 A. I did.

9 Q. Was it just one supplement that you authored?

10 A. That I am aware of, yeah.

11 Q. And do you have that supplement with you  
12 today?

13 A. I do.

14 Q. Have you had an opportunity to review it?

15 A. I did.

16 Q. And was there anything in that report that you  
17 found to be inaccurate or that you would like to change?

18 A. Not that I am aware of.

19 Q. Okay. What was your call sign back in  
20 February of 2021?

21 A. I don't recall.

22 Q. Okay. That's why St. Pete should just leave  
23 it be one number. Do you have any options that it might  
24 have been that you can think of your past one?

25 A. It could have been either 143 Alpha or 151

1 Alpha. Those are the only two I can think of.

2 Q. And that night when you arrived at the -- am I  
3 correct that you responded to a call at the Emerald  
4 Pointe Apartments?

5 A. Yes.

6 Q. Were you riding by yourself, or did you have  
7 anybody else with you that night?

8 A. I would have been by myself.

9 Q. Okay. Does your cruiser or did your cruiser  
10 back then have Coban?

11 A. Not Coban, no, I don't think so.

12 Q. Okay. Sorry. But did you have an in-car  
13 camera or just your body camera?

14 A. Oh. I have a body camera. I don't recall if  
15 I had an in-car camera at that point in time. If I did  
16 it would have through Axon.

17 Q. Okay.

18 A. Coban was what we used before Axon, I guess.  
19 But that was before my time.

20 Q. Do you recall when you activated your  
21 body-worn camera?

22 A. No.

23 Q. Did you review any of your body-worn camera  
24 footage before coming in today?

25 A. No. It's -- you have to request access to it,

1 so I wasn't able to.

2 Q. You guys even have to request access?

3 A. For certain investigations. For things like  
4 this.

5 Q. Gotcha. So how does that work? Like, at the  
6 end of your shift, do you download it? How does your  
7 body-worn camera get into the evidence.com or whatever?

8 A. We just upload it. You can upload it either,  
9 from your, like, your computer in your car, or you can  
10 dock it at the station. Either way and it uploads that  
11 way.

12 Q. Okay. But you yourself? Like, the individual  
13 officer does it?

14 A. I think -- don't quote me on it, but I think  
15 it's got some kind of automated update as well, like an  
16 automatic upload after a certain couple hours. I'm not  
17 sure. I think the cars do. I don't know if the body  
18 cameras do.

19 Q. Gotcha.

20 A. But generally what we'll do is upload it  
21 either while we are in the car or we'll plug it in at  
22 the station. Either way it will get up loaded to  
23 evidence.com.

24 Q. Okay. And in looking at your report, you do  
25 have a couple specific timestamps, or at least one

1 specific timestamp referenced in your report from the  
2 body-worn camera. Does that mean that you would have  
3 either been reviewing it, like you would have reviewed  
4 it at the same time you were writing your report --

5 A. Yeah.

6 Q. -- or about the same time?

7 A. Yeah.

8 Q. Gotcha. When you arrived on scene, did you  
9 ever enter the actual apartment?

10 A. I don't believe so. I don't recall ever  
11 entering it.

12 Q. Okay. Do you recall if Mr. Green was already  
13 loaded into the ambulance when you got out there?

14 A. I don't remember.

15 Q. Do you know when you would have activated your  
16 body-worn camera?

17 A. I don't remember specifically when I activated  
18 it. And I was just looking at my supplement. I don't  
19 remember if I put in what time I would have turned it  
20 on.

21 Yeah. It doesn't look like I documented it.

22 But I would imagine it would have been as soon  
23 as possible when I -- when I got in, but I don't recall  
24 a specific time.

25 Q. Okay. Let's say, like, on a shift -- so let's

1 say in this particular circumstance -- and I'm sorry, I  
2 also don't know offhand -- but let's say if you had had  
3 your body-worn camera on when you got to the scene and  
4 then you turn it off for some reason, and then you turn  
5 it back on when you get in the ambulance. When you  
6 download -- or upload it -- I'm sorry -- would that be  
7 two separate videos, or would it show as, like, one  
8 video with, like, a break in time?

9 A. No. Any time you activate it and then  
10 deactivate it, it ends it there. That's one video.

11 Q. Gotcha.

12 A. That's my understanding.

13 Q. Okay.

14 A. And then the next time you activate it, that  
15 would be a separate video.

16 Q. Okay. And so looking, just like the third  
17 paragraph down, you have a timestamp of 16:11. That  
18 would have been 16 minutes and 11 seconds into whatever  
19 clip that was?

20 A. In that video. That's right.

21 Q. Gotcha.

22 A. So whenever, the way I do the timestamps is  
23 just like that. It's not the time of day, it's this is  
24 where in the video you will see it.

25 Q. Okay. Do you recall if it was obvious or



1     apparent to you that Mr. Green's injury was a gunshot  
2     wound, or is that's -- or as far as like it being a  
3     gunshot wound, is that something that, like, the  
4     paramedics informed of you?

5             A.     I would have to review my follow-up.  I  
6     believe I wrote something in there --

7             Q.     Okay.  Yeah.

8             A.     -- about it.

9                     So I have it as he had what happened to be a  
10    gunshot wound to his right cheek, which was bleeding  
11    profusely.

12            Q.     So that appeared to you to be a gunshot wound?

13            A.     Yeah.

14            Q.     Okay.

15            A.     That's how I take it.  That's -- I mean the  
16    way, because I know how I write my reports.  If Sunstar  
17    had told me X, Y, or Z, I would write it that way, or  
18    whoever it was, and put it there that way.

19            Q.     Gotcha.  And as far as he was able to provide  
20    his name and date of birth?

21            A.     Yeah.

22            Q.     Okay.

23            A.     Very slowly.  And then shortly after he went  
24    into shock.

25            Q.     Okay.

1 A. Or appeared to go into shock.

2 Q. Do you recall if you had asked him any other  
3 questions other than name and date of birth?

4 A. No. Once he started going into shock, I  
5 couldn't get anything else out of him.

6 Q. Okay. Once you guys arrived at the hospital,  
7 do you stay with Mr. Green?

8 A. Yeah. We -- if I recall correctly, it should  
9 have been Trauma Room 1, which I believe I put in my  
10 report. Yes. So he was immediately taken to Trauma  
11 Room 1 at Bayfront. So I stood by with him while  
12 medical staff attended to him. That was when he -- when  
13 he was in that room is when he made that spontaneous  
14 statement documented with the body camera timestamps.

15 Q. Were you the only law enforcement officer at  
16 the hospital at this point?

17 A. No.

18 Q. Who else was there? Or in the room. I'm  
19 sorry. In the trauma room.

20 A. Well, we were standing outside of the trauma  
21 room because medical staff was -- if I recall correctly,  
22 medical staff was all over him trying to assist him.

23 Q. Okay.

24 A. So we were standing out the way. And if I  
25 recall correctly, we were by the entrance to the room.

1 But Sergeant DeWitt was on scene with me. I would have  
2 to see who else.

3 I think it was just Sergeant DeWitt and I in  
4 the beginning when we go to the hospital. Yeah.

5 Q. Okay. Do you recall any lay witnesses being  
6 on scene at the apartment complex?

7 A. No, I don't. Just --

8 Q. Okay. The medical staff, when you said that  
9 they gave you Rodney's belongings, are we talking, like,  
10 clothing or just, like, what would have been in his  
11 pockets, or you don't know?

12 A. I don't remember --

13 Q. Okay.

14 A. -- exactly what was, you know, what they put  
15 on there or what they put in the bag. Just I have it  
16 documented that they put his belongings in the bag, but  
17 I don't remember specifically what it was.

18 Q. Would anything have been, like, I guess,  
19 potentially try to ID him? Do you know if anybody had,  
20 like, tried to, like, look for ID or wallet, like, on  
21 scene before he was transported?

22 A. On scene? No, I don't know.

23 Q. Okay. Do you stay at the hospital while  
24 Mr. Green is in surgery?

25 A. Do I stay there?

1 Q. Uh-huh (Affirmative response).

2 A. Yes, I accompanied him into surgery.

3 Q. When he comes out of surgery, are you still  
4 there?

5 A. I don't recall. It looks like I left right  
6 after the completion of the surgery.

7 Q. Do you know if you had any -- like, if you  
8 actually saw him conscious or anything after surgery?

9 A. I don't -- I don't recall.

10 Q. Okay. Did you have any contact with any of  
11 Mr. Green's family at the hospital?

12 A. No, not that I can recall and not that's  
13 documented in the follow-up.

14 Q. Do you know about what time you would have  
15 returned to the Emerald Pointe Apartments?

16 A. I don't remember, and I don't think it's in  
17 here. Let me see. No, I don't have a time stamp in  
18 here.

19 Q. Would it be like in CAD notes?

20 A. It should be.

21 Q. Okay.

22 A. Yeah. Any time that you are en route,  
23 arrived, or that you clear call, there's all timestamps  
24 for that. It might not be in the notes, but it will  
25 be -- there is a track of it.

1 Q. Okay. When you got back to the scene, do you  
2 know if you even, like, exited your car?

3 A. If I remember correctly, my -- because I rode  
4 in the ambulance, my car was left at Emerald Pointe.

5 Q. Oh, okay.

6 A. So when I went back there, if I remember  
7 correctly, I got my car, I was told I didn't need to be  
8 there anymore, and left.

9 Q. Okay. How would you have got back? Did  
10 somebody bring you back? Do you remember?

11 A. Most likely.

12 Q. Like another officer?

13 A. Yeah. Usually somebody gives you a ride.

14 Q. I was, like, I don't think you Uber-ed.

15 A. Yeah. Someone will pick you up and take you  
16 back. I'm pretty sure that's what happened, because I  
17 hopped right in the ambulance. But yeah, once I got  
18 back there I was told that they didn't need me, so I  
19 left.

20 Q. As far as you know had you ever had any  
21 contact with Rodney Green before?

22 A. Not that I am aware of.

23 Q. As far as you know, had you ever had any  
24 contact with his brother, Deronrick Green?

25 A. Not that I am aware of.

1 Q. Cornelius Whitfield?

2 A. No, none of those names ring a bell.

3 Q. Okay. Cornelius Trevon Whitfield was arrested  
4 on some other homicide cases a couple weeks after this.

5 A. Okay.

6 Q. Did you have any involvement in that  
7 investigation? Do you know?

8 A. I don't know what you are referring to and I  
9 don't remember.

10 MS. MANUELE: Do you have the address offhand,  
11 Thea?

12 MS. TAKTIKOS-DANZIG: No.

13 BY MS. MANUELE:

14 Q. You probably would know if you --  
15 Nothing that sticks out, though?

16 A. No.

17 Q. Okay.

18 A. No.

19 Q. Okay. Don't worry. I'll bring you back for a  
20 depo if I find your name in a report.

21 A. No, that's fine. I don't remember right now.

22 MS. TAKTIKOS-DANZIG: You would probably  
23 remember a triple homicide that occurred a week  
24 awake after that.

25 THE WITNESS: One would, but it's not ringing

1           any bell.

2       BY MS. MANUELE:

3           Q.    Any other involvement other than what we have  
4       discussed at this point?

5           A.    No, not that I think of.

6           MS. MANUELE: All right. I don't have any  
7       other questions.

8           MS. TAKTIKOS-DANZIG: None from the State.

9           THE WITNESS: Thanks, Officer. Be safe.

10          THE WITNESS: Thanks for your time, ladies.

11          (Concluded at 10:31 a.m.)

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CERTIFICATE OF OATH

STATE OF FLORIDA  
COUNTY OF HILLSBOROUGH

I, the undersigned authority, certify that  
Kenneth Maurice Seay, III, 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 Kenneth Maurice Seay, III; 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 KENNETH MAURICE SEAY,  
III, 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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\_\_\_\_\_  
KENNETH MAURICE SEAY, III

\_\_\_\_\_  
DATE

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\_\_\_\_\_  
WITNESS TO SIGNATURE

\_\_\_\_\_  
DATE



<b>&amp;</b>	<b>2nd</b> 3:24	<b>anybody</b> 5:7	<b>b</b>
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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).

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THE ABOVE RULES ARE CURRENT AS OF APRIL 1,  
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OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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