

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: REBECCA WOLF
TAKEN BY: Counsel for the Defendant
DATE: February 12, 2025
TIME: 1:28 p.m. - 2:14 p.m.
PLACE: Pinellas Co. Justice Center
14250 49th Street - 1100-4
Clearwater, FL
REPORTED BY: Tamara M. Pacheco, RPR
Notary Public, State of FL

Pages 1 - 46

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EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 REBECCA MONCLOVA

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

5 EXAMINATION

6 BY MS. SEIFER-SMITH:

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

8 A Yes, Rebecca Monclova.

9 Q We're here in the matter of Cornelius Whitfield.

10 Our court case number is 21-01099CF. I have a
11 St. Petersburg Police Department case number of
12 2021-004037. Is that what you have in front of you?

13 A Yes.

14 Q My name is Julia Seifer-Smith. Together with
15 Margaret Russell and Lamark McGreen, we represent
16 Mr. Whitfield, and we're assistant public defenders.
17 There are also a couple of people here from the State.

18 MS. SEIFER-SMITH: Do you guys want to make your
19 appearances?

20 MS. TAKTIKOS-DANZIG: Theodora Taktikos-Danzig
21 for the State.

22 MR. KOSKINAS: Tom Koskinas, State Attorney's
23 office.

24 Q (By Ms. Seifer-Smith) So we had a brief
25 conversation off record about the things that we're going

1 to try to go over today. So it looks like you have your
2 full file in front of you. And one of the conversations
3 or part of the conversation that we had was that it
4 appears as though I'm missing but you are also missing
5 result information regarding AFIS, which is one of the
6 databases that was used in this case. Is that right?

7 A Yes.

8 Q So at the end of the deposition, we're going to
9 suspend, and you'll, I guess, go back to whomever and
10 whatever you can to see if that information still exists
11 and if it's replicable to provide to the State to provide
12 to us. Is that fair?

13 A Yes.

14 Q Okay. In terms of what we are going to -- well,
15 in terms of what you have in your file and what I have, I
16 have one like three page report that's titled Supplement
17 Narrative --

18 A Yes.

19 Q -- with a supplement date of February 9, 2021.
20 Do you have that?

21 A I do, yes.

22 Q And did you write any other reports that would
23 have --

24 MS. SEIFER-SMITH: Any questions, Tom?

25 MR. KOSKINAS: I just didn't know what you were

1 missing. I missed that. I wanted to make sure we
2 didn't already have it. I can provide it for you.
3 what is it that you're missing?

4 MS. SEIFER-SMITH: We can have this conversation
5 off record I think.)

6 (Discussion held off the record and the
7 following resumed:)

8 Q (By Ms. Seifer-Smith) So we were talking about
9 the AFIS issues.

10 A Yes. So 2021 versus now, there's a little
11 bit -- I think there was a difference. I would have to
12 look at the update date, but there was a difference back
13 then of not getting these match reports that we now get
14 that are saved or that we can print out from the results
15 list. So I would have to see if I can go back to get a
16 results list from this case.

17 Q Okay. And just generally, the way that AFIS
18 works is -- why don't you explain it.

19 A So we upload a print into the database, and we
20 submit it for a search. It gives us back what it
21 considers the top three closest to what we sent off. So
22 the computer doesn't see the entire print. It just sees
23 the points that we have marked, and then it gives us back
24 a list of -- we don't get a name. We get a number,
25 depending on which database we use, and then that number

1 is what we have to run.

2 If we look on screen and we're like, okay, I
3 think it's probably a match, we still don't -- AFIS
4 doesn't make the match. We don't confirm via AFIS the
5 match. We still do a manual comparison and pull the
6 person's fingerprint card or palm print card and do the
7 manual comparison to confirm whether it's an item or not.

8 Q And so you said like the top three matches. Is
9 that because of a setting that would be inputted by like
10 you as the analyst, like bring me the best three?

11 A That's what our system is set to. I don't know
12 if it's -- I believe it's the person that makes the
13 software that chooses for us what we have as our results
14 or how many we have back. Because it used to be five and
15 now with this current system it's three. So whatever
16 their algorithm is determines that's the most efficient or
17 effective result number for us to have.

18 Q And when you're saying the top three, that's
19 currently, but it might have been different in 2021?

20 A Yes. It's either five or three. Currently it's
21 three. It might have been five back then.

22 Q And in terms of the information that it gives
23 you, it's like a list of the top three or the top five,
24 and that would be identifiable not by name but by a
25 specific number?

1 A Correct.

2 Q And then using that number, dependent upon the
3 database that it conforms to, you're then able to look up
4 that name and the corresponding standards. Is that right?

5 A Yes.

6 Q Okay. And we don't have any of that information
7 available to us at this point?

8 A Not currently, no. I just know who -- based on
9 my report who I had, the names that I got based off of
10 AFIS searches versus the ones that were given to me for
11 comparison.

12 MS. SEIFER-SMITH: Okay. So that's why we're
13 asking for it.

14 MR. KOSKINAS: (Nods head.)

15 Q So in terms of what I did -- so I received a
16 file called Known Standards, which were for the three that
17 you were I think requested to pull or requested to look
18 at. So that would have been Rodney Green, Darren Barnes,
19 and Cornelius Whitfield.

20 A Yes.

21 Q And then two additional standards that would
22 have been associated with the AFIS results of Selena
23 Troupe and Richard Hammonds.

24 A Yes.

25 Q So that's also part of your file?

1 A Yes.

2 Q And then there were it looks like kind of four
3 envelopes broken down into four separate files for the
4 PDFs, Envelope A from Tech Frankland, Envelope B from Tech
5 Frankland, Envelope C1 from Tech Roth, and Envelope C2
6 from Tech Roth. That's also what you have?

7 A Yes.

8 Q I have four documents under a "Notes" folder,
9 Envelope A, B, C, and a subject list. Does that sound
10 right?

11 A Yes.

12 Q Okay. Side-by-side comparison views and it
13 looks like that was just for what you had identifier --
14 sorry, identified latents to standards, and so that was
15 just Envelope B and Envelope C. And for each one of
16 those, I have a side-by-side comparison and then a data
17 file indicating like the magnification and the scanning,
18 things like that.

19 A Yes.

20 Q And your report. Is that right?

21 A Yes.

22 Q And so we were talking a little bit about the
23 report date as being it looks like dated February 9th,
24 2021. I think you had said you didn't do any additional
25 reports after that time. Is that right?

1 A That's correct.

2 Q Did you do any additional work after that time
3 that wouldn't have made it into a report?

4 A No.

5 Q Okay. So can you tell me just a little bit
6 about what your job kind of generally, like your job
7 description was in 2021?

8 A Yes. So same as now. I basically analyze and
9 compare the latent prints and palm prints that are
10 submitted to us from crime scenes by the forensic
11 technicians. I don't typically go out to the scene and
12 dust for prints or anything like that. What we receive in
13 the office is then what we would analyze and then
14 eventually do comparisons, if it gets to that point.

15 Q Do you know when you became involved in this
16 case?

17 A Probably -- I'd have to see the date of the --
18 of when everything was submitted.

19 Q Where would that be? Just if you like --

20 A My AFIS searches were February 3rd of 2021, so
21 that's probably when I began everything.

22 Q I'm looking at your subject list, and it looks
23 like there are like notations, like REQ date of 2/3.

24 A Okay. Requested date, yes. Uh-huh.

25 Q So it seems like you started your work on the

1 same day you got the request?

2 A Yes.

3 Q Okay. And how do you receive requests?

4 A It depends on how it's given, if my sergeant at
5 the time either came in and verbally gave it to me, or
6 sometimes -- which wasn't I don't believe in this case.
7 They didn't do a print comparison request. We also --
8 sometimes they'll request it through iLeads.

9 Q Okay. And is iLeads like your internal kind of
10 like documenting?

11 A Yeah. Our report writing system, yes.

12 Q Do you know how it was done in this case?

13 A I don't. I just know that Sergeant Clester --
14 yeah, I just know that he gave me the three names. I'm
15 not sure whether it was verbal or -- it would be -- there
16 would have been a report from him in iLeads if he had done
17 it that way.

18 Q Okay. Is that how it's documented in iLeads,
19 just like one report, or is it like a request format?

20 A There's request form in there that they can use.
21 It's a PCR, print comparison request is the actual format
22 of it or the form that they can pull up and then submit
23 that way.

24 Q And do you know what Sergeant Clester's, like,
25 job was? I know he was a supervisor of some sort.

1 A Back then he was our supervisor, forensics, in
2 2021, yeah.

3 Q Okay. So it sounds like it would be normal to
4 get a request from your supervisor to do a particular job?

5 A It could be, yes, if someone else gave him the
6 names and then he brought it to us, yes.

7 Q And so you said that he gave you three names to
8 look for or three names --

9 A Yes.

10 Q So when that happens, what does that mean for
11 you in terms of like your preparation for your work?

12 A If the names are given to us, then we just pull
13 the known standards and then do the comparison based off
14 of those.

15 Q And so, again, the three names that you were
16 given, Cornelius Whitfield, Rodney Green, Darren Barnes,
17 do you go to a particular database in order to pull known
18 standards?

19 A There are various ones. We could either have
20 them on file in our office, or we have access to prints
21 through the state database that we can -- as long as we
22 have their state ID number or their FBI number, we can
23 search and pull their prints that way, their known
24 standards that way.

25 Q Okay. I see on the subject list and also in

1 your report that you referred to an SID number.

2 A Uh-huh.

3 Q Is that state ID?

4 A State ID, yes.

5 Q And so does that mean that's like a Florida ID?

6 A Yeah.

7 Q What does it designate, if anything?

8 A That's just the number that's assigned to
9 someone when they're arrested by the state. The state
10 gives them that number.

11 Q Would it be the same number even if they're
12 arrested multiple times, or is it just for that particular
13 arrest, that particular standard that's taken, it gets one
14 number, one unique number?

15 A No. That would be their number sort of like
16 that would stay with them.

17 Q Throughout their life?

18 A Yes.

19 Q So the SID number would be unique to the
20 individual, and it would not change?

21 A Correct.

22 Q And so is that how you would then look them up
23 within like the state system --

24 A Yes.

25 Q -- to get those standards?

1 A Yes.

2 Q And so with your file I got known standards. Is
3 there any way of knowing when those standards were taken
4 just from looking at them?

5 A Next to the ten print box where it will have,
6 like, what's their OBTS number, that is the number -- the
7 OBTS number is the number that's specific to that arrest.

8 Q Sorry, just tell me where you're looking.

9 A On the subject list, it will say ten print, and
10 then it just says either 52100 or there's 270110.

11 Q So, sorry, what does that number mean?

12 A That's the OBTS number. So that's based on
13 their -- that's specific to that arrest. That specific
14 arrest has an OBTS number.

15 Q Okay. So looking just at like Cornelius
16 Whitfield and Darren Barnes, next to their ten print
17 that's kind of checked off, there are two numbers for each
18 of those gentlemen. So what does that mean that they have
19 two numbers?

20 A That was just the known standard from two
21 different arrests.

22 Q Two -- so does that mean you're pulling two
23 separate numbers?

24 A Sometimes, yeah.

25 Q Would you actually pull two separates?

1 A Yeah. Yeah. If there isn't enough -- like if
2 one of the cards is better than the other one or maybe
3 five of the fingers are good on one and better on another
4 one or the area that we're looking for isn't great on one
5 standard, then we'll pull another standard.

6 Q Okay. I think for each of the people who were
7 mentioned -- well, actually, I guess so for each Cornelius
8 Whitfield and Darren Barnes who both have two numbers
9 associated with their ten prints, I just received one
10 standard card. Does that mean anything?

11 A No. I just must not have pulled both of them,
12 but I can't -- I mean, it would be the same fingers, just
13 different arrest date on them.

14 Q Actually, I apologize. Maybe it's just -- I
15 think it might have been a scrolling issue. Looks like
16 it's two.

17 A Oh, there are two. Might have been both.

18 Q And so the OBTS number, that's not like an
19 arrest date, but it's something that is associated with
20 like PCSO and they do the template?

21 A Whatever agency arrested them will have like the
22 start -- the first few numbers start or are specific to an
23 agency. So it just kind of depends. And also, like
24 different terminals have different start numbers. Each --
25 like, the number just designates. I can pull a

1 fingerprint card by that OBTS number, and it would be
2 specific to that arrest. Like that arrest has one OBTS
3 number.

4 Q Is there any way -- I don't have access to your
5 database, your internal St. Pete PD databases. Is there
6 any way for me to figure out from these numbers like what
7 they're associated with?

8 A Not unless you have them run it. Like, someone
9 would run to run the OBTS number to find out like the
10 details of that arrest that number is associated with.

11 Q Got it. Okay. All right. So Clester gave you
12 these three names. So the first thing that you said you
13 did is you pulled whatever ten prints were associated with
14 them?

15 A Yes.

16 Q And then what did you do?

17 A Then I would have just gone through my normal
18 process of doing the comparison. After determining which
19 of the latents were of value and which ones were not of
20 value, then taking the ones that were of value, I would
21 have done the direct side-by-side comparisons with the
22 different subjects to each of the latents.

23 Q And in terms of like how you received the
24 latents, can you just kind of like walk us through that?

25 A Yes. The technicians will submit them to us.

1 Like, they will -- there's like a drop-box that they would
2 put all the latents in whenever they are turning something
3 in. And we have a log sheet when they enter it in, and we
4 sign it when it's taken out. And then we kind of -- the
5 three latent examiners, we rotate whose week it is
6 essentially of who's taking the new cases from that week.
7 So this would have been my week, unless for whatever
8 reason the other two weren't there or something like that.
9 Then I would have taken over the case and then just
10 started the process.

11 Q Okay. In terms of what it looks like, I think
12 they're envelopes that you get the latents in. Is that
13 right?

14 A Yes.

15 Q Okay. And so I guess let's start with A. That
16 was submitted by Technician Frankland.

17 A Yes.

18 Q So let me just show you what I'm looking at,
19 which I'm sure is something you've seen.

20 A Yes. Uh-huh.

21 Q So the top, is that your handwriting, or is that
22 Frankland's handwriting, if you know?

23 A All of that is his handwriting. The only thing
24 that's mine is off to the side.

25 Q Okay. And when you say "off to the side," off

1 to the left side?

2 A Yeah. On the first envelope, yes, you'll see
3 the RW. That was my initials back then. And then the
4 four, one, and zero, those are my writing as well.

5 Q Okay. When you say four no value, one for
6 fingerprints, and zero palms, that's your assessment?

7 A Yes.

8 Q So that wouldn't be written until you actually
9 complete your work with whatever is in that particular
10 envelope?

11 A Right, once I go through and analyze and
12 determine what's of value and not of value.

13 Q Can you tell me a little bit more about the
14 notations on the left side of that envelope right under
15 your initials?

16 A Yes. That's just when I search something in
17 AFIS, I put my initials, the number of prints that were
18 searched, and then the date they were searched.

19 Q And so it looks like that's a one?

20 A Yes.

21 Q So does that mean anything about a return or --

22 A No. That's just the search. I only did one
23 search for that envelope.

24 Q And so that indicates one AFIS search?

25 A Yes.

1 Q And then looking at the back of the envelope --

2 A Uh-huh.

3 Q -- there's some notations. Is that your
4 handwriting?

5 A Yes.

6 Q Okay. And can you just tell me a little bit
7 about what you documented here? And just so you're aware,
8 when it came through on the scan, I can't see the writing
9 at the very right-hand side.

10 A Oh, okay. It cut off my -- that would have just
11 been my initials and the arrow. So it's just the date and
12 then the subjects that I compared and the results of my
13 comparison, so negative, and then my initials.

14 Q Okay. And so it looks like the first comparison
15 was done on the 3rd of February, and that's with respect
16 to the names that you were given by Sergeant Clester. Is
17 that right?

18 A Yes. Yes.

19 Q And then there was a secondary comparison that
20 was done on the 8th?

21 A Yes.

22 Q Okay. And I know you note in your report that
23 that was pursuant to AFIS returns. Is that right?

24 A The other two subjects?

25 Q Yeah.

1 A Yes.

2 Q Okay. So I guess I'm just wondering between the
3 3rd and the 8th and your notation on the front of the
4 envelope, so was there an AFIS run on the 3rd?

5 A Yes.

6 Q Okay. But you didn't run Troupe or Hammonds in
7 terms of their prints until the 8th?

8 A Well, my comparison would have -- when I filled
9 out the envelopes, so essentially when I finished the
10 comparisons or my process, that's when I dated it, the 8th
11 with those two subjects.

12 Q Okay. Got it. That makes sense. And with
13 respect to Envelope A, anything that was identifiable?

14 A There was one identifiable print that was not
15 identified.

16 Q And, I'm sorry, you said it was not identified?

17 A Correct.

18 Q Okay. So is that the print that you would have
19 submitted to AFIS?

20 A Yes.

21 Q And what I'm looking at I think has a red little
22 one on the side.

23 A Uh-huh. Yeah. That would have been just -- I
24 numbered the lifts.

25 Q Okay. And so it was just like numbered for like

1 one, two, three, four?

2 A One through five, yeah. Uh-huh.

3 Q There's a blue dot that I see in the center of
4 mine. Is that something that you add?

5 A Yes. That's indicating what was searched in
6 AFIS. Like, that print was searched in AFIS.

7 Q Okay. And no returns in AFIS for that print?

8 A None that -- there was none identified. I mean,
9 there were returns but not identified.

10 Q Oh, when you did you comparison --

11 A Right.

12 Q Okay.

13 A The results were not -- something was searched,
14 but nothing came back as a match.

15 Q Okay. I see. By you, in terms of like
16 identified by you as a match?

17 A Correct.

18 Q And do you know what the parameters were in
19 terms of the AFIS search?

20 A What --

21 Q Like are you asking it to search any particular
22 database?

23 A I would have done local, state, and then FBI or
24 NGI I think it's called now.

25 Q And that's what you would have done for anyone

1 that you put into AFIS?

2 A Yes. I search local first, and then if it
3 doesn't hit local, then I'll search state and FBI.

4 Q Okay. So anything more about that kind of first
5 envelope, Envelope A that you think is important for us to
6 talk about?

7 A No, I don't think so.

8 Q Okay. And so what would happen with that one
9 latent, lift 1A that there was enough information for
10 there to be a potential match, but you weren't able to
11 make an identification at that time back in 2021?

12 A Yes.

13 Q Does it just go and sit in a file, like your
14 file?

15 A It does, but it also stays in the database in
16 AFIS. So if someone gets arrested, what happens is it's
17 called like a reverse search. So the arrest prints get
18 run against unidentified latents. And then someone at the
19 sheriff's office, like, filters through those, and then if
20 they see one that's a potential match, then they would
21 forward it to us.

22 Q Okay. did you get any kind of notification
23 between 2021 and now?

24 A No.

25 Q So it's just continuing to live in AFIS?

1 A Yes.

2 Q whether or not there is some sort of future
3 match?

4 A Yes.

5 Q Okay. And is it you who gets identified, or is
6 it like the case agent on a case that would get -- I'm
7 sorry, notified, not identified.

8 A I would be notified, yes, if there was an AFIS
9 reverse search.

10 Q Okay. So anything else with regards to Envelope
11 A that we should discuss?

12 A No.

13 Q All right. So Envelope B, also from Tech
14 Frankland. Okay. So I guess the same thing. That's
15 Frankland's handwriting on the top, and it's your
16 handwriting on the right side of the envelope?

17 A Yes.

18 Q So only three latents were in this envelope. Is
19 that right?

20 A Yes.

21 Q And so you made a determination that there were
22 two that were no value, so you don't go any further in
23 terms of investigation, right?

24 A Right.

25 Q And there was one that you believe was a

1 fingerprint?

2 A Yes.

3 Q And so you make a determination as to whether or
4 not that could be compared. Is that right?

5 A Yes.

6 Q And -- okay. And on the back of the envelope,
7 there's just the one like I guess -- well, why don't you
8 describe what's on the back of the envelope.

9 A Yes, just the name Darren Barnes, and he was
10 identified to the one print.

11 Q Okay. So no need to go any further with regards
12 to any other comparisons, like any of the other names or
13 anything?

14 A Right, yeah.

15 Q And that was number 1A. Is that right? No, I'm
16 sorry, 1B. My apologies.

17 A 1B, uh-huh.

18 Q So there's a green dot that I see. Is that
19 something that you place there?

20 A Yeah. That would have been the AFIS, the print
21 that was searched in AFIS.

22 Q Is there any kind of -- I don't know -- rhyme or
23 reason between blue, green?

24 A No. Yeah, we just have a sticker sheet, and
25 it's just whichever one I grab.

1 Q Okay. So it's just like an AFIS designation?

2 A Yeah.

3 Q Okay. Then there's some writing on that latent.
4 Can you talk to me about that?

5 A Yes. So the number two is the finger number
6 that I identified, and then it just has like a -- if there
7 were multiple latent impressions on there, they would be
8 like A, B, C, D. So there was only one, so that's why
9 that one is A.

10 Q And then the line, is that something that you
11 drew?

12 A Yes.

13 Q Okay. And what was the purpose of that?

14 A That just helps us designate orientation, like
15 which way is up, and then to identify that's the print
16 that we were looking at or that was of value that I was
17 comparing or looking at.

18 Q Okay. The rest of the writing, it looks like
19 kind of initials on there. Were those from you, or was
20 that from somebody else?

21 A That's from someone else.

22 Q Okay. And were those there when you received
23 the latents?

24 A Yes.

25 Q And the one down in the -- it shows up as red

1 ink. Is that yours?

2 A Yes, that's mine.

3 Q And that's just to number which card it is for
4 you?

5 A Yes. I number each lift in the envelope.

6 Q Okay. Anything else that was done with regards
7 to that particular envelope?

8 A No.

9 Q Okay.

10 A B. Sorry, B.

11 Q All right. On to Envelope C1, so there were
12 considerably more lifts that were submitted in this one.
13 Is that right?

14 A Yes.

15 Q Okay. And so can you tell me what the notations
16 are here?

17 A Yes. So the same thing. The number that I
18 analyze of value or no value prints and then the number of
19 fingerprints and then my AFIS searches that I did on two
20 different days.

21 Q Okay. And so -- and then the back of the
22 envelope, can you tell me about that?

23 A That's just, again, the list of all the names
24 that were compared to these prints, and next to Selena
25 Troupe, there's two that were identified.

1 Q Okay. And then the far right, just because it
2 didn't show up, is that also your initials?

3 A My initials, yeah.

4 Q Okay. And so let's talk about the one that you
5 identified to Selena Troupe. I have it as I think 10C.

6 A Yes.

7 Q Sorry, I went too far.

8 A That's okay.

9 Q There was a green dot. Does that mean you
10 searched in AFIS?

11 A Yes. That print, yes.

12 Q And so I know that you don't have the printout
13 or like the AFIS data in front of you. You mention in
14 your report there were AFIS returns. So does that mean
15 that AFIS would have returned Selena Troupe as a possible
16 match?

17 A Yes.

18 Q Can you kind of walk me through how that would
19 work.

20 A Yes. So once I searched it through AFIS and the
21 results came back, I would have looked at them on screen.
22 And then if I would have thought, okay, this is probably
23 this number, yes, it's probably an ID, but let me pull the
24 fingerprint card and still do the manual comparison. So I
25 would have gotten her number and then pulled her

1 fingerprint card and done the manual comparison.

2 Q Can we talk a little bit about the notations
3 that are on the latent card.

4 A Uh-huh.

5 Q So I see like kind of arrow and a ten. Is that
6 your handwriting?

7 A No.

8 Q So tell me what you notated. Well, I guess,
9 sorry, before I get to that, was that on the card before
10 you received it?

11 A Yes, it was.

12 Q So tell me about what you notated there.

13 A So all I did was the A and B and then the little
14 line over each of the prints and then the number two and
15 number three.

16 Q And the number two and the number three are like
17 the pointer and middle finger?

18 A Yes, right index and right middle finger.

19 Q Okay. And when you made a determination that
20 like this latent card was a match for the standards of
21 Ms. Troupe, does anything else happen after that?

22 A It gets verified by another examiner.

23 Q And do you know who verified in this case?

24 A That would have been Sara Deubel.

25 Q Okay. Is that notated on the other side?

1 A Yes, on the back side. In the upper right-hand
2 corner are her initials.

3 Q Do you know when that would have been done?

4 A I don't. Yeah. I mean, once I make mine, I
5 would have handed it off to her, so on the 3rd. So it
6 just depends on when she returned it to me, if it was --
7 I'm not sure if it was the same day or not. I can
8 probably look at that or check with her. She might be
9 able to look in her file and see.

10 Q So she would document it somewhere too?

11 A Probably. I would think she probably would have
12 known when -- well, I couldn't say actually. She might
13 have information in her files as to when she did the
14 comparison or the verification.

15 Q She's one of your colleagues within the same
16 unit?

17 A Yes.

18 Q Okay. So like a latent analyst as well?

19 A Yeah.

20 Q Sorry, I know we've talked about it before, but
21 when did you start in the unit?

22 A I started in 2005.

23 Q Do you know when Sarah started?

24 A Before me. So she -- I forget what year she's
25 in now. Maybe her 28th year or something. Long time.

1 Q So you've worked together for, goodness, 20
2 years?

3 A Yes. Yes.

4 Q And I imagine that she's served as your
5 verifier, and you've served as her verifier throughout
6 those years?

7 A Yes.

8 Q Can you recall any instance where you didn't
9 agree with an identification that she's made?

10 A No.

11 Q Can you recall any instance where she didn't
12 agree with an identification that you've made?

13 A No.

14 Q And how many of you are there in the unit?

15 A There's three of us.

16 Q I thought it was a pretty small number. And you
17 all have been there for quite some time, yeah?

18 A Yes. The third examiner, she's -- I think this
19 is her fourth year, so she's the newest of us. But the
20 examiner for before her, Melinda was 30-plus years.

21 Q Got it. And I don't see any kind of like notes
22 there from Sarah like in terms of what she was looking at.
23 Just like in your process since you've been working with
24 her for such a long time, when you hand over a card to her
25 and say this is a card for you to take a look at for

1 verification, do you tell her anything else? Like any
2 particular points of comparison that you looked at or just
3 hand it over?

4 A I mean, she knows -- I give her the subject, and
5 she'll have the card with my notations on it. That's what
6 she would then -- she would start her comparison based off
7 of that for her verification.

8 Q Just the notations that you have here on the
9 card I mean?

10 A Yes.

11 Q And the reason I ask is because I also have
12 digital renderings that you did with points and things on
13 them. She doesn't get that?

14 A Sometimes I include that. I'll have to look
15 back because we've kind of changed things a little bit.
16 Sometimes I would include those in there, and then that's
17 kind of on her if she wants to look at them or not. It's
18 not something that she would only look at those. She
19 would do the process herself as well.

20 Q Okay. And do you know if you provided those to
21 her or not in this case?

22 A I don't know. I would have to see if she has it
23 on her end on what she saved basically.

24 Q Okay. I don't think I have like a supplement
25 narrative. When you say what she saved, do you think it

1 would be something in iLeads?

2 A No, because we don't write a verification
3 report.

4 Q Okay. So would it just be notations somewhere?

5 A Yeah, if she saved her side-by-side comparisons
6 or something like that.

7 Q I see. Okay. And the side-by-side
8 comparison -- well, we'll get there. So this was as to
9 Ms. Troupe, number 10C. I guess I should have asked
10 earlier, did you receive any kind of other documentation
11 or reports from anybody regarding like the circumstances
12 of the case? Anything like that?

13 A I mean, the reports are all in iLeads under that
14 case number, but I wouldn't have looked through them or
15 anything. Yeah.

16 Q Okay. And so when in your report it's
17 documented in terms of lift 1C, exterior southeast bedroom
18 door, that's notating the information that you have
19 directly from the latent card itself?

20 A Yes. From the card, yes.

21 Q Not because you've been to the scene or anything
22 like that?

23 A Correct.

24 Q All right. Then I think the next impression of
25 value was in the final envelope, Envelope C2.

1 A Yes.

2 Q So just I guess kind of briefly, let's go over
3 that envelope. So the cover indicates that you received
4 12.

5 A Yes.

6 Q And then the rest of the notations, like your
7 initials on the far left side, that's yours, as well as 11
8 no value, one fingerprint, zero palms.

9 A Yes.

10 Q And it was 22C. So tell me about this one.
11 This was also an AFIS comparison -- not comparison, a
12 suggestion from AFIS.

13 A Yes.

14 Q So tell me about this.

15 A Yes. There was just one impression of value on
16 that lift, and that's the one that I searched through
17 AFIS. And then as a result from that, I got the name
18 Hammonds, Richard Hammonds and pulled his fingerprint card
19 and did a comparison directly to that impression.

20 Q Okay. And you believed that that latent was
21 identified to Mr. Hammonds. Is that right?

22 A Yes.

23 Q Okay. And so the notations in terms of that
24 kind of directionality, the number finger, and I think
25 you -- is that an A? It's tiny.

1 A Yeah, it's A.

2 Q So those are all yours?

3 A Yes.

4 Q And the number six indicates left thumb?

5 A Left thumb, uh-huh.

6 Q And this would have been given again to Sarah
7 for verification?

8 A Yes.

9 Q Okay. And so just so that we're clear, like
10 every -- the other latent that you identified pursuant to
11 AFIS or pursuant to a suggestion from AFIS, as well as
12 this one, does that mean you already compared them to the
13 known standards that you have, like Whitfield, Barnes, and
14 Green?

15 A I did not. This one I only compared to Richard
16 Hammonds.

17 Q Okay. So it's not as though your -- well, it's
18 not as though you're excluding and then going to AFIS?

19 A Right. Typically we start with AFIS, and then
20 after that, I would have not -- so since I did identify
21 him based on AFIS to that one, there was nothing else to
22 compare or anyone else to compare it to.

23 Q Okay. Now, I see there's initials on other
24 latent cards.

25 A (Nods head.)

1 Q Can you just explain why that might be?

2 A We also have the no values verified. So if we
3 determine a latent lift card is no value, we still turn it
4 over to another examiner so that they verify that they
5 agree, yes, there's nothing of value on that card.

6 Q Similar to the question I asked earlier about an
7 identification and verification, have you ever submitted
8 like a no value to her and she's been like, oh, no, I
9 think there's something here?

10 A Yes. It would be more -- yes, that would be --
11 yes. Yes.

12 Q Okay. Do you have any idea why that might be?

13 A Not necessarily. It just could be something
14 that I looked at it at the time, and if I just, you know,
15 missed it or if I was unsure about it and then she looked
16 at it and was like I think we could go ahead and keep that
17 one, then that's something we kind of discuss.

18 Q If somebody believes that it isn't of no value,
19 either Sarah or your other colleague, what do you do at
20 that point?

21 A I would just then keep it in -- keep it of value
22 and then analyze it and go through the comparison if there
23 were names being compared.

24 Q If you make a determination that something is no
25 value, do you enter it into AFIS?

1 A No. Because if it's no value, there's just
2 nothing there that we can do.

3 Q If you think no value but the verifier believes
4 that it potentially might have information there, does
5 that then get entered into AFIS?

6 A It would depend on the quality of the print.
7 Sometimes it's just not good enough AFIS quality
8 necessarily. Not to say we couldn't identify it, but
9 there just might not be enough information there to
10 actually do a successful AFIS search.

11 Q Okay. I see. And in terms of doing your
12 comparisons, what kind of equipment are you using?

13 A We have a scanner and a large monitor that I'll
14 scan it in, and we have a program we use called -- Sarah
15 and I used to called CSI Pics that allows us to bring the
16 latent and the known impression up side-by-side, and we
17 can draw and annotate. Like, my side-by-side comparisons
18 come from that program.

19 Q Do you do that with every comparison that you
20 do, or do you use any other kind of equipment, like a
21 magnifying glass?

22 A If I'm doing my first kind of analysis, I'll
23 have the magnifying glass maybe and look over it in
24 general, or if I'm on AFIS, like, looking over something
25 first with a magnifying glass and then scan it in. But

1 otherwise, yes, everything comparison-wise would be
2 scanned in and use the monitors for.

3 Q Okay. So I'm looking at 1A. I guess kind of
4 generally -- this can be a general question for all of the
5 side-by-sides. I'm happy to turn my computer screen
6 around if you don't have the side-by-sides in front of
7 you.

8 A I've got them here.

9 Q I'll give you time. Let me know when you're
10 ready.

11 A Okay.

12 Q So just kind of generally, in looking at these,
13 there's obviously what appears to be from a standard,
14 right, like a much more perfect looking print and then a
15 photograph from the latent or the scan from the latent. I
16 think you said they're scanned.

17 A Yes.

18 Q Okay. And so would both of those have been
19 scanned at the same time by you?

20 A Yes. I mean, I would have scanned them in, yes.

21 Q And there's some, like, colored markings.

22 A Yes.

23 Q Are those added by you?

24 A Yes.

25 Q Okay. And there -- what I see are a few

1 different colors. I see red, blue, and green and then
2 some yellow lines depending on what you're looking at.

3 A Yes.

4 Q Can you tell me what each of those mean?

5 A So, for me, the red ones are ending ridges, so
6 just a ridge that flows along and stops. The green, I use
7 that for bifurcations. And then the blue little circle,
8 if it's just a dot or a very small fragment I'll kind of
9 use the little blue circle. And then the yellow line is
10 just if it's a short ridge or something I'm following
11 along, I just use it that way.

12 Q Some of these points have like little lines
13 coming off of them. Is that something that you also add
14 yourself?

15 A That's the -- how that point is made in the
16 program.

17 Q Okay. I just don't have a good magnification.
18 So they're in different directions for some of them?

19 A Uh-huh.

20 Q Is that something that you designate, or is that
21 a program issue?

22 A It's what I designate.

23 Q And so what would those lines coming off the
24 points designate?

25 A So where the ridge ends and then I would pull it

1 back to where it's starting to flow towards I guess the
2 little line on it.

3 Q Okay. So it's an indication, like a
4 directionality?

5 A Directionality, uh-huh.

6 Q Sorry, is that a yes?

7 A Yes. Sorry.

8 Q And are you looking for any particular number of
9 points of comparison?

10 A There's no minimum standard in the US for the
11 number of points.

12 Q Do you like for yourself have a standard?

13 A No. It just really varies depending on the
14 print and the quality of the known and the uniqueness of
15 the formations and just different -- those different
16 things are taken into consideration. So it's not just
17 strictly a number like, oh, I have to get to this number
18 or else I don't make it.

19 Q And I guess kind of like the next question would
20 be, is there anything for your unit or for the St. Pete
21 Police Department in terms of a standard by which you need
22 to operate for points of comparison or what your
23 comparison needs to show?

24 A No.

25 Q And like for you, kind of yourself as a

1 professional, is there a point at which you would say,
2 oof, in this comparison -- like, I've made the comparison,
3 but I just can't say that this is an identification?

4 A Yeah. I mean, if I don't feel completely
5 comfortable or a hundred percent confident in it, then I
6 wouldn't make it. I wouldn't enforce it.

7 Q So every time that you've said that something is
8 an identification, you're like a hundred percent certain
9 this latent came from the person who gave that standard?

10 A Yes. I would be confident with that, yes.

11 Q And I think you said that you typically make
12 these available to your verifier, but you obviously can't
13 control what your verifier does or doesn't do in terms of
14 their work, right?

15 A Yes. Yes.

16 Q I'm not sure that I have a recent CV from you.
17 Have you done a curriculum vitae?

18 A Oh, yeah.

19 Q Do you mind sending that to the State?

20 A Sure. Yes.

21 Q Have there been any particular, like, additional
22 continuing education credits or like programs that you've
23 done since 2021? I know that your job is the same, but
24 technology always changes.

25 A Yes. I've done different training courses and

1 things that would be updated on that.

2 Q Is there any particular like continuing
3 education requirement either within generally the
4 profession or specifically for St. Pete?

5 A We do proficiency testing every single year. So
6 that's kind of our main thing. Then as far as trainings
7 that we come across that we're interested in, then we
8 would put in for it to try to get approved for and such.

9 Q Okay. Can you just tell me a little bit about
10 the proficiency training?

11 A Yeah. So it's from a third-party that we get
12 them from. They e-mail a test to us essentially, and then
13 we all work through it and you submit your answers.
14 You're given a specific number that is assigned to you,
15 and that just gets sent off to them to grade I guess for
16 you.

17 Q Have you had any trouble ever meeting their
18 standards?

19 A No.

20 Q Are you a member of any kind of professional,
21 like, efficient working groups?

22 A Yes, the IAI, which is the International
23 Association for Identification, and then the FDI AI, which
24 is the Florida Division of the IAI. Both of those.

25 Q So you're a member of both?

1 A Yes.

2 Q Have you had any positions like on the board --

3 A No.

4 Q -- committees, anything like that?

5 A No.

6 Q Okay. Do they do any kind of periodicals, like
7 a journal, newsletter? Anything like that?

8 A Yes, both.

9 Q Do you receive those?

10 A Yes.

11 Q Do you read them?

12 A Yeah, some of them. Some of it is more
13 technical to the processing of stuff, but I will read
14 through them to see if there's anything that's
15 specifically of interest to comparisons.

16 Q Have you ever done any work in processing, like
17 as a technician in the field?

18 A Very little. Occasionally I'll process
19 something with ninhydrin if it's like a check or something
20 like that, but other than that, I don't do processing.

21 Q Okay. And you didn't have to process anything
22 in this case?

23 A Correct.

24 Q So nothing was given to you for that?

25 A No.

1 Q And it appears as though all of the latents that
2 you received were lifted from black powder. Does that
3 seem right, if you know?

4 A I would -- I mean, it looks like either black
5 powder or mag powder, but it would be up to the technician
6 to specifically say which they used.

7 Q Did you review any of the reports that were
8 written by the technicians who made submissions that you
9 reviewed?

10 A The only thing I might have done is to look to
11 see if they had them -- like if they weren't numbered in
12 what order they listed them in, but other than that,
13 that's the only thing.

14 MS. SEIFER-SMITH: Okay. I don't know that I
15 have anymore questions. Ms. Russell or Mr. McGreen.

16 MS. RUSSELL: I do not.

17 MR. MCGREEN: No questions.

18 MR. KOSKINAS: That's it. Thanks for coming in.
19 We appreciate your time.

20 MS. SEIFER-SMITH: So if you can just reach out
21 to the State when you figure out the AFIS --

22 THE DEPONENT: Yeah, and I'll e-mail the CD as
23 well. Yes.

24 MS. SEIFER-SMITH: Thank you.

25 (Deposition concludes at 2:14 p.m.)

1 COUNTY OF PINELLAS)

2 STATE OF FLORIDA)

3 CERTIFICATE OF OATH

4
5 I, the undersigned authority, certify that
6 REBECCA MONCLOVA personally appeared before me and was
7 duly sworn.

8 witness my hand and official seal this 15TH day
9 of MARCH, 2025.

10
11 Tamara M. Pacheco

12 Tamara M. Pacheco, RPR
13 COMMISSION # 474485
14 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
6 authorized to and did stenographically report the
7 Deposition of REBECCA MONCLOVA; that a review of the
8 transcript was requested; and that the transcript is a
9 true and complete record of my stenographic notes.

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

15 *Tamara M. Pacheco*16 Tamara M. Pacheco, RPR
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ERRATA SHEET

IN THE CASE OF: STATE OF FL v. CORNELIUS WHITFIELD

NAME OF DEPONENT: REBECCA MONCLOVA

CASE NUMBER: 21-01099CFANO

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