

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

Case Number: 21-01513CFANO

STATE OF FLORIDA,

Plaintiff,

VS.

CORNELIUS TREVON WHITFIELD,

Defendant.

DEPOSITION OF:

ERIC CLAGUE

TAKEN BY:

Counsel for the Defendant

DATE:

October 20, 2025

TIME:

9:45 a.m. - 10:04 a.m.

PLACE:

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

REPORTED BY:

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

Pages 1 - 23

JTP REPORTING (727)422-8287

APPEARANCES

TOM KOSKINAS, ESQUIRE

Assistant State Attorney

14250 49th Street North

Clearwater, Florida 34620

Attorney for the State of Florida

JULIA SEIFER-SMITH, ESQUIRE

MARGARET RUSSELL, ESQUIRE

Assistant Public Defenders

14250 49th Street North

Clearwater, Florida 34620

Attorneys for the Defendant

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EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 ERIC CLAGUE

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

5 EXAMINATION

6 BY MS. SEIFER-SMITH:

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

9 A. Eric Alexander Clague.

10 Q. We're here in the matter of Cornelius Whitfield.
11 We're here in court case number 21-01513CF. My name is
12 Julia Seifer-Smith. Together with Margaret Russell, we're
13 assistant public defenders, and we represent
14 Mr. Whitfield. Also present is Tom Koskinas from the
15 State Attorney's office.

16 So I have in front of me a report that you wrote
17 with case number 2021-006023. Did you have an opportunity
18 to review that?

19 A. Yes.

20 Q. Okay. We had a brief conversation off the
21 record. I had sent you a link to the body-worn camera,
22 but you said you weren't able to download it. So you
23 haven't reviewed that yet?

24 A. Yes, that is correct.

25 Q. It will be available to you if during any point

1 in our conversation you think you want to take a look at
2 it.

3 A. Sure.

4 Q. In your review of the report, did that jog your
5 memory as to your involvement in the case at all?

6 A. Yes.

7 Q. I don't think we've spoken before, so I'd love
8 to hear some information about your professional
9 development within the police force and what you do now.

10 A. Sure. So, as far as experience as a law
11 enforcement officer, started I was an MP in the Army for
12 five years. I got out, became a police officer for the
13 City of Gulfport. I was there for a short amount of time,
14 maybe two years. Through that, I held positions as an
15 acting supervisor, DEA, TFO, and obviously patrol officer.

16 Then I went to St. Petersburg Police Department
17 where I was there for about five years. There I held
18 positions as really an FTO, so field training officer, and
19 patrol officer in various districts, one of them being
20 District 1 where this incident occurred.

21 Three years ago roughly, I resigned from law
22 enforcement to run my software business. We vend to law
23 enforcement. We're active all over the state.

24 Q. What's the name of the software business?

25 A. PoliceReports.ai.

1 Q. How do you like it?

2 A. It's cool.

3 Q. Good. And it's your company?

4 A. It's my company.

5 Q. Great. Congrats. So tell me about how you got
6 involved in this particular case.

7 A. Yeah. So this particular case, I was working
8 patrol in District 1. I forget the specific zone, but I
9 was dispatched. The call came out as I don't believe what
10 it was initially titled. It could have been a person shot
11 at the address of Queensboro, the 3000 block of
12 Queensboro.

13 Q. Okay. Do you recall what kind of information
14 you received before getting to the location that you just
15 indicated. Did you receive information over dispatch or
16 over the phone? Anything like that?

17 A. I -- so it was dispatch. It would have been via
18 radio. I don't remember the exact information. I just
19 know that it was somebody shot at that location.

20 Q. Okay. And when you heard, like, the specific
21 location, was that someplace that you had been familiar
22 with from work on the force? Like, had you been there
23 before?

24 A. No, ma'am.

25 Q. And about how long did it take for you to get

1 there, if you know?

2 A. I don't recall. It was rather fast, under five
3 minutes.

4 Q. When you arrived, can you tell me what you
5 observed?

6 A. So when I arrived there were several other
7 officers. Some on scene had exited the vehicle. I
8 observed a female sitting in the front yard of 3063
9 Queensboro Avenue South. She was sitting on a chair, and
10 she was -- it appeared she had a gunshot wound to her arm.

11 Q. Okay. Was she by herself?

12 A. No. There were other, like, citizens around. I
13 don't recall who.

14 Q. Okay. Did you make immediate contact with her?

15 A. Yes.

16 Q. Okay. Can you tell me about that contact?

17 A. The contact was -- I don't recall what I said
18 without seeing my body cam.

19 Q. Understood.

20 A. But, yes, I did make immediate contact with her.
21 I do recall throughout the entire incident she appeared to
22 be in a bit of shock.

23 Q. When you saw her, was she a person that was
24 familiar to you from any other prior contact as a police
25 officer?

1 A. No.

2 Q. And was she able to communicate with you?

3 Because you just mentioned that she was in shock.

4 A. Yes, she was. To the extent, I don't recall,
5 but she was able to communicate. I remember it was
6 minimal. I don't recall the specifics, but yes, it was
7 minimal.

8 Q. Do you recall what kind of information she was
9 able to give to you at that time?

10 A. I do not.

11 Q. Okay. Now, you said that there were other
12 officers that had arrived before you did. Do you happen
13 to remember who those officers were?

14 A. They either arrived at the time or slightly
15 before. I know one of them was Matt Laliberte because I
16 know they went to address the house while I was dealing
17 with the victim. I don't recall the other ones.

18 Q. Okay. So there was another house that was the
19 focus of some attention?

20 A. Yes.

21 Q. Okay. And how was that, and why was that, if
22 you know?

23 A. That was the house where the incident occurred.

24 Q. Okay. So is that information that came from the
25 woman that you were speaking with?

1 A. I believe it did, but I believe it was given to
2 other officers. I don't recall if I received that or the
3 other officers did.

4 Q. Did you ever go to that home?

5 A. Sorry. Can you explain go? What do you mean by
6 go to it?

7 Q. Sure. So you said earlier that you made contact
8 with this woman in front of 3036 [sic] Queensboro Ave, and
9 she had indicated that an incident had occurred at a
10 separate location.

11 A. Uh-huh.

12 Q. So I guess I'm asking about the separate
13 location, if you went there?

14 A. No. They were close, right. Maybe one house
15 separating it. I'm not exactly sure. But, no, I never
16 went there. Later, obviously, the SWAT Team showed up and
17 did a bunch of stuff after that. I do know other officers
18 kind of held the location, so tactically positioned
19 themselves because they know there was somebody inside
20 armed.

21 Q. You weren't involved in that?

22 A. No, I was not. I was at the hospital.

23 Q. You said it was fairly close, like only one
24 house or so away?

25 A. Yes.

1 Q. Were you able to physically see that house?

2 A. Yes.

3 Q. Did you see any movement or any people at that
4 home, not officers?

5 A. No. No.

6 Q. So did you stay with this woman the whole time
7 in terms of your involvement in the case?

8 A. Yes, the majority of it. I mean, there might
9 have been -- in that initial when we were trying to figure
10 out what was going on, there might have been times where I
11 left her, spoke with the lieutenant or whatever. She was
12 placed in the ambulance. I was not in the ambulance with
13 her. I followed the ambulance to the hospital.

14 Q. Okay. Is that normal?

15 A. Yes.

16 Q. And was there another officer that went in the
17 ambulance with her?

18 A. No. I don't believe an officer rode with her,
19 no.

20 Q. Did you hear anything about what occurred, if
21 she had any conversations with the paramedics or any
22 conversations over the phone? Did you hear any of that
23 once you got to the hospital?

24 A. Yes. I'm obviously looking at my report here.

25 Q. Do you remember independently too or just

1 because of the report indicates?

2 A. I do remember independently, but I don't really
3 have a clear recollection of events unless I reference the
4 report.

5 Q. Okay. That's fair. So you arrived together at
6 the hospital, yourself and the ambulance?

7 A. Following it, yes.

8 Q. Okay. And then did you follow Ms. Harilal into
9 the hospital?

10 A. Yes.

11 Q. Did you have any more contact with her during
12 that kind of like immediate transport from the ambulance
13 into the hospital?

14 A. No, not from -- our contact was started, like,
15 in the hospital when we were sitting -- so I don't know if
16 you ever -- if you know the layout. You probably saw it
17 from the body camera. They were kind of in this, like,
18 waiting area right where you get assigned a room. That's
19 when I started my contact with her again.

20 Q. Okay. On this occasion, was she able to
21 communicate with you? Like, I guess was she able to
22 process a bit more than what she was able to communicate
23 earlier?

24 A. Yes. To the extent, I don't know. At that
25 moment, right, our biggest concern was, okay, we clearly

1 have an armed suspect. Let's figure out who is in the
2 house and what kind of information we're getting. So
3 whoever we can get information from is kind of what we
4 were doing.

5 I do recall that the information she was giving
6 was very brief. I don't -- I don't remember the specifics
7 of it. But I do recall that it was very brief, and that's
8 what led to my conversation.

9 Q. what did she tell you?

10 A. I don't recall exactly.

11 Q. Okay.

12 A. I can't say for certain.

13 Q. was she able to give you any kind of account of
14 what happened in the home?

15 A. Initially, I don't believe so. Again, I'm not a
16 hundred percent certain, but I don't believe so. I do
17 remember she gave detectives later a better account of
18 what occurred because they did show up. I don't recall.
19 I do recall speaking with the paramedic.

20 Q. Okay. Did Ms. Harilal give you the names of the
21 people who were involved?

22 A. I don't recall. Can I reference the report?

23 Q. Sure. You can reference the report. You can
24 reference the body-worn camera if you want to see it.

25 A. Okay. So from the report, she explained that it

1 was her son that had shot her, and then I continued -- and
2 her son, Cornelius Whitfield, and then I continued
3 speaking with the paramedic after.

4 Q. Do you know if it was Ms. Harilal who said it
5 was her son who shot her or if you asked her was it your
6 son, Cornelius Whitfield who shot you?

7 A. I don't recall.

8 Q. Okay. And do you know or do you remember
9 Ms. Harilal giving you any kind of more details about what
10 had occurred at the home?

11 A. I don't recall if that was from her or
12 third-party from the paramedic.

13 Q. I guess there's that paragraph that starts with
14 Harilal arrived.

15 A. Yes.

16 Q. I think maybe it's indicative that Paramedic
17 McCafferty is telling you this, but I'm not sure.

18 A. Yes. So he did the majority of it. Initially,
19 yes, it was provided by the paramedic, yes, reference he
20 overheard her speaking on the phone in the ambulance.

21 Q. Did you have further contact with Ms. Harilal at
22 the hospital?

23 A. I stood by until detectives showed up. I don't
24 know if there is BWC of that. We had a policy. At that
25 point, I think we were turning it off and turning it on in

1 the hospitals because of, like, HIPAA and whatever. I'm
2 unsure what -- I know it was minimal, the interaction I
3 had with her. I was kind of just relaying information
4 back to the detectives because, like, our concern at that
5 point was, hey, we have somebody armed in the house. We
6 need to figure out what's going on here. So it was very
7 minimal if I did have any.

8 Q. Do you recall any additional information coming
9 from Ms. Harilal, like, about this incident, about her
10 son? Anything like that?

11 A. I don't recall, no.

12 Q. And do you know which detectives came to the
13 hospital and spoke with her?

14 A. Yes. So it was -- I recall some of them.
15 Sergeant Elizondo. Detective Mallory Webster I believe
16 her name was. I know there were probably some other ones.
17 Those were the two I remember.

18 Q. Any contact at the hospital, or did you hear
19 about anybody else at the hospital having come from the
20 house? Like any other civilians I mean.

21 A. I don't know for certain, no. I don't recall.

22 Q. Okay. And were you there when or if there was
23 any kind of forensic processing of Ms. Harilal?

24 A. No. I do believe that forensics unit showed up,
25 but I wasn't -- I mean, I could have been at the hospital

1 during that time, but I don't think I was in the room
2 while she was getting processed, if that's what you're
3 asking. I don't believe so.

4 Q. Did you collect anything from her?

5 A. I don't recall, but I don't think so.

6 Q. Okay. And do you remember overhearing her on
7 the phone with anybody, any kind of conversations with
8 anybody?

9 A. I don't recall, no.

10 Q. Did she have any family members or friends who
11 came to the hospital to be with her?

12 A. Possibly. It's rather common in shootings. I
13 do believe there were some, but I think I had minimal
14 interaction with them.

15 Q. Do you remember hearing anything from anybody
16 that showed up that had any relevance to the case?

17 A. It's possible I could have, but I don't
18 remember.

19 Q. Did you ever go back to that location?

20 A. At some point, I'm sure --

21 Q. I'm sorry, that was a big question. Back to
22 where you had initially made contact with Ms. Harila,
23 Queensboro or Emerson.

24 A. I could have. Like within this case, right?

25 Q. Within the confines of this case.

1 A. I could have, but my involvement was minimal if
2 I did return to the house.

3 Q. Do you recall having any kind of conversations
4 with your colleagues, like other patrol officers who were
5 involved in the investigation or any other detectives who
6 were involved in the investigation?

7 A. At any point?

8 Q. Yeah, like talking about the case.

9 A. Yeah. I do know I called Sergeant Elizondo to
10 give him the information about what we had learned from
11 the victim and the paramedic. I spoke with him and may
12 have spoken with Detective Webster as well just to kind of
13 relay information back. I'm sure I had some radio traffic
14 that I provided, as is common with these type of
15 incidents.

16 Q. When you heard -- I can't quite remember if it
17 was Ms. Harilal suggesting that it was her son or you
18 having heard that it might have been Cornelius Whitfield
19 and you suggesting that to her. But the name Cornelius
20 Whitfield, was that familiar to you for any reason?

21 A. I remember that we were -- so, obviously, on the
22 probable cause bulletins and whatnot and our read-off
23 meetings, I do remember the name came up as someone who
24 was wanted in some connection with a homicide. Now, to
25 the extent of what homicide -- because going through these

1 daily read-off briefs, we'll go down a list, and it's
2 like, okay, this person, this person. So I do remember
3 hearing the name. But I had no knowledge of the homicide
4 in which he was a person of interest in or probable cause
5 existed, but I do know they were looking for him.

6 Q. So in terms of what you're describing as your
7 familiarity with the name was before having contact with
8 Ms. Harila? You would have already heard the name
9 Cornelius Whitfield?

10 A. I did, yes.

11 Q. But you don't know the nature of that
12 investigation.

13 A. No.

14 Q. Is that right?

15 A. No, I don't. So I didn't know -- I probably
16 didn't even look at the probable cause bulletin that they
17 put out when probable cause exists, but I am aware that I
18 believe there were dispatch notes when we were dispatched
19 to the house that said, hey, 30 -- whatever, the 3000
20 block of Queensboro, there was something that had to do
21 with another case that we were looking for a suspect.
22 Those notes a lot of times aren't -- you know, they're
23 just something you're given as you're responding, and a
24 lot of times you're not super focused on those because
25 you're driving to a person shot.

1 Q. Okay. So it sounds like you recall this kind of
2 like flag regarding Cornelius Whitfield in terms of your
3 arrival and initial involvement in the case.

4 A. Yes.

5 Q. And that information came from some other
6 investigation. Is that fair?

7 A. Yes.

8 Q. But not something that you uncovered in the
9 course of your involvement in this investigation on
10 February 16?

11 A. Nothing I was independently really familiar with
12 prior to that.

13 Q. Did you have any further contact with
14 Ms. Harilal, like, after she left the hospital after she
15 was discharged?

16 A. After she was discharged, I don't believe so,
17 no.

18 Q. Did you have any kind of other contact with any
19 other members of Ms. Harilal's family?

20 A. You know, I may have, but I don't recall.

21 Q. And were you part of any kind of debriefs that
22 were done by, like, Major Crimes Unit or within the Patrol
23 Unit regarding involvement in this investigation?

24 A. So, yes, every time you respond to an incident
25 where there's an armed person, typically the next day you

1 will do debrief, more of less kind of involving tactics
2 and things along those lines. I have no independent
3 recollection of what happened in the debrief. I mean,
4 I've been through hundreds of them, so --

5 MS. SEIFER-SMITH: I don't know that I have any
6 further questions. Do you have any questions,
7 Ms. Russell?

8 MS. RUSSELL: No questions.

9 MR. KOSKINAS: That's it. You're all set.

10 BY MS. SEIFER-SMITH

11 Q. Well, just quickly before we close, are you
12 comfortable closing? Did you want to take a look at the
13 body-worn camera at all before you close out?

14 A. No, I'm comfortable closing. If we move
15 further, I can take -- if there's more steps, I can take a
16 look at it.

17 Q. Okay. So what I'm just going to put on the
18 record then, like, you've understood all the questions
19 that I've asked today, yeah?

20 A. Yes.

21 Q. And it sounds like at this point there's nothing
22 you wish to add or change regarding your testimony?

23 A. No.

24 Q. If you have an opportunity to review the
25 body-worn camera in the future and you think you would

1 like to add anything to our conversation, would you be so
2 kind as to reach out to my office or to the State
3 Attorney's office?

4 A. Sure.

5 MS. SEIFER-SMITH: So at this point, what I'll
6 do is, I'll conclude the deposition. I'll reserve your
7 right to read just with that caveat that we might have to
8 reopen the convo.

9 THE DEPONENT: Sure.

10 (Deposition concludes at 10:04 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 ERIC
6 CLAGUE personally appeared before me and was duly sworn.

7 witness my hand and official seal this 16th day of
8 November, 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 Eric
7 Clague; that a review of the transcript was requested; and
8 that the transcript is a true and complete record of my
9 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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IN THE CASE OF: STATE OF FL V. CORNELIUS WHITFIELD

NAME OF DEPONENT: ERIC CLAGUE

CASE NUMBER: 21-01513CFANO

PAGE	LINE	ERROR/AMENDMENT	REASON FOR CHANGE
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This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and extend across the width of the page. There are no margins, text, or other markings on the paper.

Date