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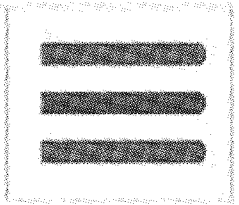
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1 IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
2 OF THE STATE OF FLORIDA IN AND FOR PASCO COUNTY
3 CASE NO.: 2023-CF-000562
4 DIVISION: CIRCUIT CRIMINAL

5
6 STATE OF FLORIDA,
7 Plaintiff

8
9 V.

10
11 WILLIAM CLIFTON,
12 Defendant

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23 DEPONENT: WILLIAM ADAMS
24 DATE: MAY 29, 2024
25 REPORTER: TIFFANY REED



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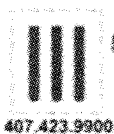
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DIRECT EXAMINATION BY MR. FALLS

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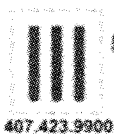
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STIPULATION

The deposition of WILLIAM ADAMS was taken at the STATE ATTORNEY OFFICE NEW PORT RICHEY, 7530 LITTLE ROAD, NEW PORT RICHEY, FLORIDA 34654, on WEDNESDAY the 29TH day of MAY 2024 at 1:36 p.m. (ET); said deposition was taken pursuant to the FLORIDA Rules of Civil Procedure. It is agreed that TIFFANY REED, being a Notary Public and Court Reporter for the State of FLORIDA, may swear the witness.

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PROCEEDINGS

THE REPORTER: All righty. We are now on the record. Will all parties, except for the witness, please state your appearance, how you're attending, starting with Plaintiff's counsel?

MR. FALLS: I guess that would be you, Plaintiff's counsel.

MR. SARABIA: You mean the State? I'm not the Plaintiff's counsel. Brian Sarabia for the State Attorney's Office.

MR. FALLS: James Falls for the defendant, William Clifton.

THE REPORTER: Thank you. Mr. Adams, will you please state your full name for the record?

THE WITNESS: William Frank Adams, Junior.

THE REPORTER: Thank you. Mr. Adams, will you please raise your right hand? Do you solemnly swear or affirm that the testimony you're about to give will be the truth, the whole truth, and nothing but the truth?

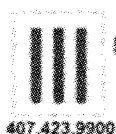
THE WITNESS: I do.

THE REPORTER: Thank you. You-all may begin.

DIRECT EXAMINATION

BY MR. FALLS:

Q. All right. Good afternoon. Could you please



1 state your name and spell it?

2 A. Yeah. William F. Adams, Junior.

3 W-I-L-L-I-A-M, F, A-D-A-M-S.

4 Q. Thank you. As it relates to your attendance

5 today, we are here for a deposition in case number

6 23-CF-562, State of Florida versus William Clifton.

7 Before I start asking you any questions, just to kind of

8 give you the basics, we have a court reporter present

9 who's responsible for taking down our verbal answers.

10 So if I see you shaking your head, or nodding your head,

11 although you and I both know what that means, it

12 wouldn't be accurately reflected by the court reporter.

13 So I would just ask that you verbalize all your answers.

14 As it relates to any questions that I ask in a

15 confusing manner, please just tell me that it's

16 confusing. Ask me to rephrase it, however you would

17 like to approach that. If there's anything that you do

18 not remember and you need a moment to refresh your

19 recollection with whatever it is that we can try to help

20 you refresh your recollection with, please just let us

21 know. If there's anything that you just can't remember,

22 no matter what, please say so. If there's anything that

23 you don't know, please just say so. The goal being just

24 to try and get your testimony on the record as clear as

25 possible. Otherwise, do you have any questions for me



1 before I start?

2 A. Nope. I'm ready.

3 Q. All right. As it relates to February 9, 2023,
4 do you recall where you were located around 4:00, or
5 5:00, 6:00 p.m.?

6 A. I -- I was standing in the Krnjaiches' front
7 yard, on the sidewalk.

8 Q. Okay. And you just mentioned the Krnjaiches.
9 For spelling purposes, do you have the spelling readily
10 available?

11 A. I do not.

12 MR. FALLS: Okay. For the record, it's my
13 understanding that Krnjaiches are spelled
14 K-R-N-J-A-I-C-

15 H.
16 BY MR. FALLS:

17 Q. All right. So you had indicated that you were
18 standing in what capacity near the Krnjaiches'?

19 A. On the sidewalk.

20 Q. Okay. In front of their home?

21 A. Yes.

22 Q. And do you recall that address?

23 A. I do not.

24 Q. Okay. As it relates to the standing in front
25 of their home, do you recall the other individuals that



1 were with you on that day?

2 A. Yes.

3 Q. And who were they?

4 A. Dan Zweifel, Sara Connolly, Amanda Krnjaich,
5 and -- and Mike, and their two children, and I believe
6 Dan's daughter, Z., as well.

7 Q. Okay. And Mike, being Michael Krnjaich?

8 A. Yes.

9 Q. Okay. Now, as that day was progressing, was
10 there anything that drew your attention to any incidents
11 that were out of the norm?

12 A. Yes.

13 Q. What was that?

14 A. William Clifton, you know, coming to an abrupt
15 stop in the road, exiting his vehicle, and then moving
16 the speed bumps that were in the road.

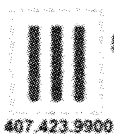
17 Q. Okay. As it relates to the vehicle that was
18 exited by the individual you stated was William Clifton,
19 do you recall make, model, or color of that vehicle?

20 A. No.

21 Q. All right. Do you recall the clothing that
22 Mr. Clifton was wearing?

23 A. No.

24 Q. More specifically, do you know if he was
25 wearing shorts or long pants?



1 A. I'm fairly certain it was long pants.

2 Q. Okay.

3 A. But there's video. We could -- we could check
4 all this.

5 Q. Sure. As it relates to him approaching what
6 you indicated were speed bumps, what type of speed bumps
7 were those?

8 A. Just yellow speed bumps, temporary speed
9 bumps.

10 Q. Plastic or --

11 A. Plastic.

12 Q. Okay. And one -- when you recognized that he
13 was approaching those speed bumps, where were you
14 specifically located?

15 A. On the sidewalk in front of the Krnjaiches'
16 house.

17 Q. Okay. And as it relates to anything else that
18 was surrounding you, including people or things, were
19 you behind any objects?

20 A. A tree.

21 Q. Okay. And where were the other individuals
22 that you named located at the time in which you noticed
23 the individual that you named Mr. Clifton walking
24 towards the speed bumps?

25 A. I believe Sara Connolly and Dan Zweifel were



1 within arms' reach of me on the sidewalk. And I think
2 that Mike and Amanda were up closer to their house, and
3 the kids were in the driveway -- or on the sidewalk.

4 **Q. Okay. So when you indicate individuals**
5 **would've been in their driveway or up near their house,**
6 **would that have been behind you, if you were facing the**
7 **street?**

8 A. I think my -- I -- I -- initially, I believe I
9 was facing more towards the house or down the road, as
10 opposed to the street view or the -- the house view so -
11 -

12 **Q. Okay. All right. And then once you noticed**
13 **the individual that you named as William Clifton walking**
14 **towards the speed bumps, what happened next?**

15 A. There was some words exchanged between Mike
16 and Clifton. I -- Mike approached him after Clifton
17 threw the first set of speed bumps. And then as he went
18 to go to the second one, Mike pushed him.

19 **Q. Okay.**

20 A. And Clifton kind of, you know, popped back
21 from that and drew a weapon.

22 **Q. Okay. Now, as it relates to the words that**
23 **were exchanged, do you recall the words that were used**
24 **and by who?**

25 A. I -- the only thing that really stands out is,



1 Mike said something to the effect of, "Hold on, buddy.
2 Don't do that. Don't touch those." I -- I -- I don't
3 remember the rest of the -- the -- the exchange.

4 Q. Okay. And then at that point in time where
5 there was a physical encounter, you indicated Mike
6 pushed him, meaning Mike pushed Mr. Clifton?

7 A. Yes.

8 Q. All right. And at that time, where were you
9 positioned, as it relates to this incident?

10 A. Still on the sidewalk, right next to the tree.

11 Q. Okay. When you say, "next to the tree," does
12 that mean that the tree was not in front of you?

13 A. I think at that angle, the tree was probably -
14 - they -- they were about a 45-degree angle, you know,
15 offset of the tree. So, you know, I -- I guess it's a
16 matter of perspective. It should -- it's on the tape.

17 Q. Okay. And as it relates to your distance from
18 the location where Mr. Clifton and Mr. Krnjaich were,
19 can you estimate how far away you were?

20 A. 30 feet.

21 Q. Okay.

22 A. 25 feet, somewhere in that distance, I would -
23 - I would guess.

24 Q. And as the incident turned from verbal to
25 physical, were you focused on that incident



1 specifically, or did you have an understanding of where
2 other parties were situated and what was going on?

3 A. I was pretty focused on -- on -- on the
4 physical altercation and especially when the gun came
5 out.

6 Q. Sure. And once you indicated that Mike pushed
7 Mr. Clifton, you also indicated that Mr. Clifton popped
8 back. Could you describe that with more detail, if you
9 can?

10 A. Well, I -- I think the video would give a
11 better definition than -- than I could. It's been a
12 long time but -- but --

13 Q. And if you don't remember, you can say, "I
14 don't remember."

15 A. Yeah, Mike shoved him, and -- and Clifton, he
16 just -- he just popped back. He didn't fall down. He
17 didn't really, you know, stumble, or fall down, or
18 anything. He just popped back and -- and drew a gun.

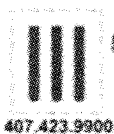
19 Q. Okay. Do you recall where on his person the
20 firearm came from?

21 A. Somewhere in his -- his belt. I can't
22 remember it's the front, the back, the side.

23 Q. Okay.

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

25 Q. And as it relates to the type of firearm, do



1 you recall that?

2 A. It -- some handgun. I -- I don't -- I don't
3 know what kind of handgun it was.

4 Q. Okay. Are you familiar with the distinction
5 between a semi-automatic pistol and a revolver?

6 A. Yes.

7 Q. Okay. And if you were able to look at the two
8 separate firearms that I just notated, would you be able
9 to tell the difference?

10 A. Yeah, if I was close enough.

11 Q. Okay. As it relates to the firearm in
12 question, were you close enough to be able to tell the
13 difference?

14 A. Gosh, I -- I definitely was. I believe it was
15 a semi-automatic. I don't think it was a revolver, but
16 I'm -- it's been so long now.

17 Q. Sure. I didn't mean to cut you off. Did you
18 have anything?

19 A. That's it.

20 Q. Okay. Color-wise, do you recall color?

21 A. No. Not off the top of my head.

22 Q. Okay. And when he drew the firearm, do you
23 recall whether or not he drew it with his left or right
24 hand?

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



1 Q. Okay. And once the firearm was drawn, how
2 were you positioned in relation to where Mr. Clifton and
3 Mr. Krnjaich were?

4 A. Again, they were -- you know, if I'm looking
5 directly at, you know, where he was, he's probably --
6 call that 15 degrees to the -- to -- you know, off the
7 center of that tree. And Mike started at, probably like
8 30 or 45 degrees and then started running.

9 Q. Okay. In which direction do you recall Mr.
10 Krnjaich running?

11 A. I don't know. It -- I -- I think it was like
12 some kind of a twisting motion where he started down the
13 street and then ran up the driveway.

14 Q. Okay. And for ease, I guess, do you mind if
15 we just refer to him as Mike?

16 A. Yeah, that's fine.

17 Q. Okay. So I don't have to keep butchering his
18 last name. Once Mike took off running, what were you
19 focused on?

20 A. The gun.

21 Q. Okay. And what happened next? What did you
22 observe?

23 A. I heard Amanda scream in the background, and
24 then I -- I kept my eyes on -- on Clifton, and I just
25 remember him kind of tracking with Mike, and then kind



1 of sweeping all the rest of us with the gun, and him
2 resting it, his gaze, on me, as I was, you know, hiding
3 behind the tree for cover.

4 **Q. Okay. And when you said "Amanda," that's**
5 **Amanda Krnjaich?**

6 A. Yes.

7 **Q. Okay. When you heard her scream, do you**
8 **recall what she said?**

9 A. I -- I think she yelled her husband's name,
10 but I -- I -- it's on the video.

11 **Q. Okay. And you indicated tracking Mike. What**
12 **do you mean by that?**

13 A. As Mike was running, he was tracking him with
14 the firearm, as -- as Mike was running. I assume that's
15 what he was doing, but I -- I wasn't paying attention to
16 Mike. I was just looking where that gun was -- was
17 pointing at.

18 **Q. Okay. So from your visual perspective, you**
19 **were watching the gun, and what did that gun do,**
20 **positionally?**

21 A. It kind of swept across the -- the front of
22 the house. And then, like I said, it -- it kind of
23 settled on -- on where I was standing, and I -- I don't
24 remember from the video. I've seen the video since
25 then, but it's been months now. I don't know if it was



1 just pointed at me or if there were other people that
2 were in my vicinity, as well. But I -- I think me, and
3 Sara Connolly, and Dan Zweifel were all kind of hovered
4 in the same area. So I -- I was -- I -- like I said,
5 hyper-focused on it, where it was pointed and -- and
6 when it was pointed at me, specifically.

7 **Q. Okay. From the time in which the firearm was**
8 **first drawn, to the time in which you indicated that it**
9 **was focused on you, do you have a estimate about the**
10 **length in time that was?**

11 A. I -- I don't it's on the video. We could --
12 you know, you could -- you could see that.

13 **Q. Okay. And as it relates to the other**
14 **individuals that you said you believed were kind of**
15 **grouped in the same area, where were they located**
16 **positionally, as compared to you?**

17 A. Close, adjacent, within an arm's length or
18 two, I -- I would -- I would assume.

19 **Q. Do you recall whether they were to your left,**
20 **or your right, or at your hip, behind you, in front of**
21 **you?**

22 A. They were not in front of me.

23 **Q. Okay.**

24 A. And I -- I just -- I haven't looked at the
25 video in so long. I -- I don't remember where they



1 were.

2 **Q. Okay.**

3 A. Like I said, I was pretty hyper-focused on --
4 on the gun, especially while it was pointed at me.

5 **Q. Okay. And as this is going on, other than the**
6 **statement from Amanda, do you recall anyone else making**
7 **any statements that you overheard?**

8 A. I -- I did -- I made a statement.

9 **Q. Okay. And what was your statement?**

10 A. To Mr. Clifton, I said, "Don't point that
11 thing at me," or, "Don't point the gun at me." I -- I -
12 - I can't remember which it was, and it's hard to hear,
13 but you can say, "Don't point something at me". And
14 then I said, "I'm just standing here, eating an apple,"
15 because that's what I was doing.

16 **Q. And is that the extent of your statements?**

17 A. I believe so.

18 **Q. Okay.**

19 A. The video and the audio that -- that came from
20 the video, you know, reminded me the first time. I
21 didn't remember saying, "Don't point that thing at me."
22 I just remember saying, "I'm just standing here, eating
23 an apple," and that -- you know, the entire time that I
24 was having that interaction, the gun was still trained
25 on me. And so a lot of it is a blur.



1 Q. Okay. But if we were to review the video, at
2 the time in which you are making the statement that you
3 just indicated, the firearm was pointed at you? Is that
4 your testimony?

5 A. Yeah, that was my major concern, is that there
6 was a gun pointed at me, and I was literally, just
7 standing there, eating an apple.

8 Q. Okay. As it relates to anybody else in your
9 surrounding, Mr. Clifton, or any of the other
10 individuals that you've listed, do you recall them
11 making any statements at or around that time?

12 A. I just remember Amanda yelling, you know,
13 something. I -- I can't remember if she yelled her
14 husband's name, because at the time the gun was pointed
15 at him, or if she was yelling her children's name,
16 because, you know, he was sweeping the weapon across
17 everybody who was standing in front of the house.

18 Q. Okay. And when the -- you said the firearm or
19 Mr. Clifton was sweeping or tracking, what did that look
20 like from his positional perspective? And what I mean
21 by that more specifically, do you recall if he was
22 moving his arms, if he was moving at the hips, if he was
23 moving his feet? Do you recall anything about that?

24 A. I -- I -- I don't recall if -- you know, if he
25 was changing his body position, but like I said, just



1 hyper-focused on where the gun was pointed and so arms
2 were extended and -- and saw where the gun was -- was
3 coming to.

4 **Q. Okay. And at that point in time, what was**
5 **your position in relationship to Mr. Clifton?**

6 A. When he was pointing it at me?

7 **Q. Yeah.**

8 THE REPORTER: Is that a yes?

9 MR. FALLS: Yes.

10 THE WITNESS: Well, he was -- he was -- he was
11 facing me, so -- so he was, I guess, directly in
12 front of me because I was facing him. So, you know,
13 the -- the orientation changed as things were
14 moving, but -- but we were face-to-face at a -- you
15 know, a decent distance. He was just on the other
16 side of -- of his car.

17 BY MR. FALLS:

18 **Q. Okay. And I guess I should have asked that.**
19 **When you indicated that the car came to an abrupt stop,**
20 **do you recall where it stopped?**

21 A. Just on the right-hand side of the road. I --
22 I -- I think he was in his lane, and when he got out, I
23 remember him walking to the -- so yeah, just in the
24 road.

25 **Q. Okay.**



1 A. In his lane.

2 Q. If you were looking at the tree, would the
3 vehicle have been to your left, if you were facing the
4 street, and your back was facing the home?

5 A. I think it would've been maybe just a little
6 to the left.

7 Q. Okay.

8 A. Just a little.

9 Q. All right. And when you had indicated that it
10 was a good distance away. Do you recall the amount of
11 feet? I think you previously had indicated it was about
12 30 feet from the time in which there was a physical
13 interaction. Did that distance change at all throughout
14 the course of that incident?

15 A. It did. And so he -- he moved -- you know, it
16 was probably a little bit -- a little bit closer, but I
17 -- I don't know how much closer. It -- he -- he just
18 moved from -- you know, like I said, if I was facing --
19 my back was directly to the house and the tree was
20 directly in front of me, it started off, you know, a 30,
21 45-degree angle to the right. And then he closed the
22 distance by coming over to more, you know, 5 or 10
23 degrees, or maybe even, you know, head-on. I -- I -- I
24 don't know. The -- the film has a better memory than I
25 do so --



1 Q. Sure. Once you indicated that you were
2 looking at him and the firearm was pointing at you, what
3 happened next?

4 A. Well, that's when I -- I -- I said, "Don't
5 point that thing at me. I'm just standing here, eating
6 an apple," and I held the apple up. And then, you know
7 -- and then after that, he -- it's almost like he kind
8 of re-collected himself or something. I -- I don't
9 know, but -- but, you know, he lowered the weapon. He
10 eventually got into his car, and then I -- I don't know
11 what he did. I think, you know, another neighbor across
12 the street came out, and I told him, you know, to go
13 back in. "Don't come out here. He's got a gun."

14 Q. Okay.

15 A. Something to that effect.

16 Q. As it relates to the neighbor across the
17 street, do you recall who that was?

18 A. Jamie Connolly.

19 Q. Okay. And Jamie Connolly, were they in the
20 driveway of their home when they were coming out?

21 A. He was in his home --

22 Q. Okay.

23 A. -- until after the incident.

24 Q. Okay.

25 A. And so really didn't see anything that



1 happened.

2 **Q. Okay.**

3 A. So I don't think he's in any of the police
4 reports, or a witness, or anything. He -- I think he
5 came after the fact.

6 **Q. Have you spoken to him about the incident?**

7 A. Not in a long time, so not in a while.

8 **Q. When you did speak to him, did you talk about**
9 **the incident with him?**

10 A. Yeah. Well, of course. Yeah. Yeah.

11 **Q. And what did you learn from his perspective?**

12 A. That -- not -- really nothing. He didn't see
13 anything.

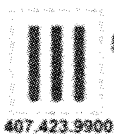
14 **Q. Okay.**

15 A. So he came out, and there was some dude
16 sitting in the car, and, you know, I -- I don't know.

17 **Q. So at the time that you spoke with him, his**
18 **perspective was, by the time he exited his home, there**
19 **was an individual sitting in their car?**

20 A. Yeah, I think that -- that sums it up. Like I
21 said, I think the video is, like -- you know, could
22 answer all these questions better than me.

23 **Q. Well, more importantly, I just want to make**
24 **sure that I have your testimony on record, which is the**
25 **purpose of this deposition. And certainly, yeah, I'm**



1 not holding you to the standard of having the memory of
2 a video --

3 A. All right.

4 Q. -- but just want to hear it from you,
5 directly. And this is the first time I've heard about
6 Jamie Connolly. So that's the reason why I ask you
7 those questions. Otherwise, from what you can remember,
8 anything else about that conversation between yourself,
9 and Jamie Connolly, and the incident that he indicated
10 that he was able to see, hear, or observe?

11 A. I don't think he saw, heard, or observed
12 anything of the incident. Like I said, he came out
13 pretty well after it was all done and Clifton was back
14 in his car.

15 Q. Okay.

16 A. So maybe even he had pulled further down the
17 road. I -- he drove off at one point so --

18 Q. Okay. And then when we talk about Mr. Clifton
19 getting in his vehicle, are you able to say the length
20 in time in which his firearm was drawn?

21 A. No. I -- I don't recall. It seemed like it
22 happened pretty fast, until it was pointed at me.

23 Q. Sure. And when the -- when you indicated that
24 it seemed like he had regained his composure, kind of
25 came back to, what did he do with the firearm at that



1 point?

2 A. I -- I don't know. I think he slowly lowered
3 it and I -- I don't know if he re-holstered it or kept
4 it out. I'm -- I'm -- I'm hazy on that. I don't -- I
5 don't recall.

6 Q. Okay. And then from the time in which he
7 either lowers it or re-holsters it, what did you do, if
8 anything?

9 A. I think I just kept standing there and kind of
10 -- I -- I -- maybe at that point I kind of looked up at
11 what was going on around me. I -- I don't know.

12 Q. Do you recall what you observed at that point
13 in time?

14 A. I -- I -- I don't. Like I said, I -- I -- I
15 remember the precursor to the physical altercation. I
16 remember the altercation, and then that all went so
17 fast. Like I said, time really kind of slowed down.
18 What I really remember is just staring down the barrel
19 of a gun.

20 Q. Okay.

21 A. That's vivid.

22 Q. And when it's all said and done, do you run
23 back to your home, jog back, walk back, stay where
24 you're located? Do you recall those incidents?

25 A. I talked to -- I talked to Mike for a second.



1 I -- I talked to everyone else, and -- and then I went
2 home and, you know, closed up the doors and the garage,
3 and kept everybody inside, and I stayed home and -- and
4 -- until I think the police came and knocked on the
5 door.

6 Q. Okay. You said you believe you talked to Mike
7 for a second. Do you recall what that conversation was
8 about?

9 A. I think I said, that he's -- he's lucky that -
10 - that -- that Clifton didn't shoot him so --

11 Q. Okay. And did you speak to anybody else
12 before going back home?

13 A. I -- I -- I don't remember, you know,
14 adrenaline -- you know, post-adrenaline.

15 Q. And then at that point, that's when you said
16 you went back home. Do you recall how you got home?

17 A. I walked.

18 Q. Okay. Once you were at your home, was there
19 anyone else located in your home that had witnessed what
20 occurred?

21 A. No.

22 Q. Okay. And then did you see what happened with
23 Mr. Clifton before law enforcement arrived?

24 A. I -- I think he, like, pulled -- like, he made
25 a left on Berrypick, I think, or he just pulled down the



1 street and stopped. I think he made a left down
2 Berrypick and -- and he waited there, I think, until the
3 police came so --

4 Q. Okay. And did you have any other interactions
5 with him on that day?

6 A. No.

7 Q. Okay. And then once police arrived, did you
8 speak with law enforcement?

9 A. I did.

10 Q. Did you provide a written statement?

11 A. I believe I did.

12 Q. Okay. From what you can remember as it
13 relates to your testimony here today, do you have any
14 belief that your testimony differed than what you told
15 law enforcement?

16 A. I don't -- I don't think so.

17 Q. Okay. When law enforcement arrived, do you
18 recall who you spoke to or how many law enforcement
19 officers you spoke to on that night?

20 A. I -- I don't. I -- I -- I think there was
21 just one, but I -- I don't -- I don't recall. It was a
22 long time ago.

23 Q. Okay. And --

24 A. So they didn't come until much after it was
25 dark out, and mosquito time, and -- and all of that so -



1 -
2 Q. And in between the time in which you briefly
3 spoke with Mike, walked home, closed the garage, locked
4 up, did you exit your home before law enforcement
5 arrived?

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

7 Q. Okay. Do you recall calling or texting
8 anybody that was there for that incident, before law
9 enforcement arrived?

10 A. I don't recall.

11 Q. Okay. And once law enforcement arrived, you
12 spoke to a law enforcement officer and potentially
13 provided a statement?

14 A. Yeah, they knocked on the door, and -- and I
15 talked to them.

16 Q. And then after they wrapped up their
17 investigation that evening, did you provide any other
18 statements to any other individuals in any law
19 enforcement capacity?

20 A. I don't believe so. No.

21 Q. Okay.

22 A. But I don't remember. It was a long time ago.

23 Q. Sure. If you wouldn't mind, just one moment.
24 Did you call 911?

25 A. I did not.



1 Q. Okay. Do you know who did?

2 A. I don't.

3 Q. Why didn't you call 911?

4 A. I -- I didn't even think to. I -- I --
5 honestly, I just wanted to get home and make sure my
6 kids were inside. I -- I didn't know if the incident
7 was over or not.

8 Q. Did you have any recording capability to
9 capture the incident on that evening?

10 A. From my phone, but that's it.

11 Q. Did you capture the incident?

12 A. That's the only capacity that I had, but I did
13 not.

14 Q. You answered my question exactly the way I
15 asked it. All right. As it relates to your home, did
16 you have Ring doorbell or anything like that?

17 A. Yeah. I do have a Ring doorbell, and there
18 are also exterior cameras.

19 Q. And did your exterior cameras or Ring doorbell
20 capture any of the incident?

21 A. No.

22 Q. Did you look to see if it did?

23 A. I didn't even bother, because everything was
24 several houses down.

25 Q. Right. Did law enforcement ask to view your



1 camera footage?

2 A. No. Not that I recall.

3 Q. You mentioned when the firearm was drawn, Mike
4 ran and made potentially some -- a loop or something of
5 that nature. Over the course of that entire incident,
6 did you ever see where anyone else was located from the
7 time in which the push happened to the time in which the
8 incident was over with?

9 A. I -- I -- I don't recall. I think the cameras
10 probably captured it pretty well, though.

11 Q. And as it relates to the firearm being drawn
12 and then swiveling over towards your direction, are you
13 confident that the firearm was trained at you?

14 A. Long enough for me to have an interaction.

15 Q. What does that mean?

16 A. Well, you can hear on the -- the video footage
17 that I had enough time to say, "Don't point that thing
18 at me. I'm just standing here, eating an apple," and I
19 showed the apple.

20 Q. So I guess, in response to my question, are
21 you confident in that the firearm was trained at you?
22 How does that relate?

23 A. I -- it was trained on me while I was saying
24 that. Yes.

25 Q. So in sum, you are confident?



1 A. Yes.

2 Q. Okay. As it relates to the questions that
3 I've asked here today, has it jogged any memories of
4 that incident that you haven't discussed today or
5 otherwise?

6 A. No. I -- I would have to see the video again,
7 and I'm sure things would click but --

8 Q. But as it stands here today, the information
9 that you've provided as a part to my questions of I --
10 that I've asked, that's the information that you're
11 aware of at this time?

12 A. Yes, sir.

13 MR. FALLS: All right. That's all I got for
14 you. Thank you.

15 MR. SARABIA: All right. No questions.

16 THE REPORTER: Does Counsel want to explain
17 read or waive?

18 MR. FALLS: Sure. So at a point in time, if we
19 order the deposition testimony to be transcribed,
20 they are taking the record and turning it into, you
21 know, a transcription of what occurred today. And
22 as a witness, you have two options, as it relates to
23 that and your testimony.

24 The read option gives you the opportunity to go
25 to the court reporter's office during that



1 transcription time and read over it, and they would
2 make note of your comments as it relates to if you
3 believe there were any errors, like, no, I said that
4 the firearm was green, or something of that nature.
5 Now, it doesn't necessarily change the transcript,
6 but your notes, as it relates to you reading the
7 preparation of that transcript, would be noted.

8 Alternatively, you can say, "I waive that." And
9 if we do, in fact, get transcripts and provide them,
10 you would have the opportunity to review them before
11 giving any testimony or anything of that nature. So
12 it's not though you're waiving your right to read
13 the transcript. It's though you're waiving the
14 ability to make note of any issues you have with the
15 transcript. So Option 1 is to read, which allows you
16 to go to the transcript's -- transcriptionist
17 office. And Option 2 is to waive, which says, I'm
18 not going to do that.

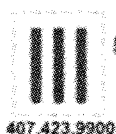
19 THE WITNESS: I'll waive.

20 MR. FALLS: Okay. Most do.

21 THE REPORTER: And Mr. Falls, did you want to
22 order today?

23 MR. FALLS: I have to confirm with my client.

24 THE REPORTER: All right. Let me get us off
25 the record.



(DEPOSITION CONCLUDED AT 2:09 P.M. ET)

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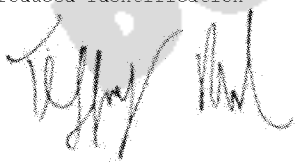
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1 CCERTIFICATE OF OATH

2
3 STATE OF FLORIDA
4 COUNTY OF ORANGE

5
6 I, the undersigned, certify that the witness in the
7 foregoing transcript personally appeared before me and
8 was duly sworn.

9
10 Identification: Produced Identification



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16 _____
17 TIFFANY REED
18 Court Reporter, Notary Public
19 State of Florida
20 Commission Expires: 11/07/2027
21 Commission Number: HH 462305???



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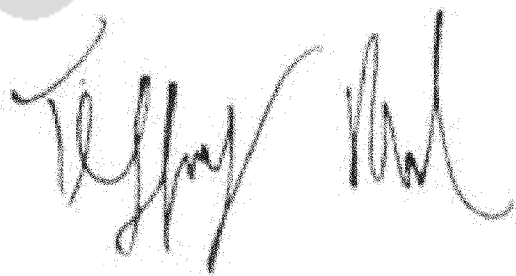
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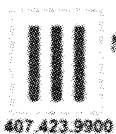
I, TIFFANY REED, Court Reporter and Notary Public for the State of Florida at Large, do hereby certify that I was authorized to and did report the foregoing proceeding, and that said transcript is a true record of the said proceeding.

I FURTHER CERTIFY that I am not of counsel for, related to, or employed by any of the parties or attorneys involved herein, nor am I financially interested in said action.

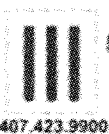
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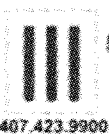
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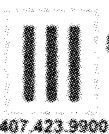
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