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IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL  
CIRCUIT OF FLORIDA, IN AND FOR FLAGLER COUNTY

STATE OF FLORIDA,

vs.

CASE NO.: 2015-627-CFFA

PAUL ANDREW HILLMAN,

Defendant.

\_\_\_\_\_ /

DEPOSITION OF GEORGE M. CARNARIUS

Taken on Behalf of the Defendant

DATE TAKEN: Wednesday, March 23, 2016

TIME: 9:24 a.m. - 9:53 a.m.

PLACE: Office of the State Attorney  
1769 East Moody Boulevard, Building #1  
Bunnell, Florida

Stenographically Reported by:

Melanie E. Szafran  
Registered Professional Reporter

Page 2

1 APPEARANCES:  
2  
3 Counsel for State of Florida:  
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Assistant State Attorney  
5 1769 East Moody Boulevard, Building 1  
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6  
7 Counsel for the Defendant:  
8 RICHARD A. PRICE, ESQUIRE  
Law Office of Richard A. Price, P.A.  
9 Post Office Box 350906  
Palm Coast, Florida 32135  
10  
11  
12 ALSO PRESENT:  
13 Janet Youngs, Victim Advocate  
14  
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10 (None)	
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1 PROCEEDINGS  
2 GEORGE M. CARNARIUS, called as a witness by the  
3 Defendant, having been first duly sworn, testified as  
4 follows:  
5 THE WITNESS: I do.  
6 DIRECT EXAMINATION  
7 BY MR. PRICE:  
8 Q Please state your full name and spell your last  
9 name, please.  
10 A George Manning Carnarius, C-A-R-N-A-R-I-U-S.  
11 Q And Mr. Carnarius, have you ever given a  
12 deposition before?  
13 A No.  
14 Q Okay. So I'm going to be asking a series of  
15 questions. The questions are designed to elicit responses  
16 from you, but they're not designed to argue with you,  
17 they're not designed to trick you. This is a discovery  
18 process.  
19 When I ask you the questions, you have to answer  
20 out loud so that the court reporter can take down what we're  
21 saying, and she can't type down head nods and things like  
22 that. I will try not to speak when you speak, if you can  
23 try not to speak when I speak. That'll help her, because  
24 she can't type down two things at one time.  
25 Other than that, are you ready to begin?

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1 A Yes.  
2 Q Okay. Have you ever given a deposition before?  
3 A No.  
4 Q And Mister -- and I want to make sure I pronounce  
5 your last name correct. Can you pronounce --  
6 A Carnarius.  
7 Q Carnarius.  
8 Mr. Carnarius, where do you live?  
9 A 9 Shady Lane South.  
10 Q How long have you lived there?  
11 A Six years.  
12 Q And who do you live with?  
13 A Myself, and, at the time, Linda Warrell.  
14 Q And how long has Linda lived there?  
15 A The same time as I have.  
16 Q Okay. And what is your relationship to Linda?  
17 A Just a good friend. I took care of her.  
18 Q And is she still living with you?  
19 A No.  
20 Q Okay.  
21 A She's down in Daytona at a rehab and rest home  
22 type thing.  
23 Q Okay. Was your relationship with her ever  
24 romantic?  
25 A No.

	Page 8
<p style="text-align: right;">Page 6</p> <p>1 Q And how long did she stay with you?</p> <p>2 A About five and a half years.</p> <p>3 Q Did you ever take rent from her?</p> <p>4 A No.</p> <p>5 Q Did you --</p> <p>6 A I paid her rent.</p> <p>7 Q And this Shady Lane, this was her residence?</p> <p>8 A Yes.</p> <p>9 Q And do you still live at her residence?</p> <p>10 A Yes.</p> <p>11 Q And you're still paying her rent?</p> <p>12 A I pay the rent. She's no longer on the lease or</p> <p>13 whatever.</p> <p>14 Q Okay. At some point, did you or Linda rent out</p> <p>15 space there at that residence?</p> <p>16 A No.</p> <p>17 Q At some point, did a Paul Hillman live at your</p> <p>18 residence with you?</p> <p>19 A Yes.</p> <p>20 Q And what was the arrangement?</p> <p>21 A None. He needed a place --</p> <p>22 Q Go ahead, I'm sorry.</p> <p>23 A He needed a place to stay, and he was a friend, I</p> <p>24 thought, and so we let him, you know, sleep on the couch.</p> <p>25 And I fed him, gave him clothes -- you know, washed his</p>	<p>1 ever work for you, clean the house, do chores and odd jobs</p> <p>2 to earn his keep?</p> <p>3 A No.</p> <p>4 Q Okay. Did Paul ever have a relationship with</p> <p>5 Linda?</p> <p>6 A No.</p> <p>7 Q Was there ever a relationship going on between you</p> <p>8 and Paul?</p> <p>9 A No.</p> <p>10 Q Was there ever a relationship going on between the</p> <p>11 three of you?</p> <p>12 A No.</p> <p>13 Q Okay. When Paul moved to Sabrina's place, did</p> <p>14 that upset you?</p> <p>15 A No.</p> <p>16 Q Did it upset Linda?</p> <p>17 A No.</p> <p>18 Q Was Paul upset?</p> <p>19 A Not that I know of.</p> <p>20 Q Do you know why Paul moved out?</p> <p>21 A No.</p> <p>22 Q Do you know -- let me back up.</p> <p>23 Did you and Linda ever discuss why Paul moved out?</p> <p>24 A No.</p> <p>25 Q Okay. Did you ever discuss with Sabrina why Paul</p>
	Page 9
<p style="text-align: right;">Page 7</p> <p>1 clothes, and all the rest of his stuff.</p> <p>2 Q Do you recall when you had Paul move in?</p> <p>3 A Not exactly, no. It was June, maybe -- maybe it</p> <p>4 was in June, I'm not sure.</p> <p>5 Q Okay. So, this incident, this case, happened on</p> <p>6 July 30th.</p> <p>7 A Yes.</p> <p>8 Q So that was last summer.</p> <p>9 A (Witness nods head.)</p> <p>10 Q Let's go back to July 30th.</p> <p>11 How long had Paul been there at the house?</p> <p>12 A He'd been there off and on for about a month and a</p> <p>13 half and had just moved out down to Sabrina Hall's place on</p> <p>14 39 -- 29 Shady Lane North.</p> <p>15 Q And I may have asked you this, and I apologize if</p> <p>16 I'm repeating myself:</p> <p>17 Did he ever give you any rent?</p> <p>18 A No.</p> <p>19 Q Did he ever give you anything of value in exchange</p> <p>20 for staying there?</p> <p>21 A No.</p> <p>22 Q And he stayed there on the couch, or did he have a</p> <p>23 room?</p> <p>24 A On the couch.</p> <p>25 Q Did he ever give kind? In other words, did he</p>	<p>1 moved out?</p> <p>2 A No.</p> <p>3 Q Okay. Had Paul completely moved out by the time</p> <p>4 this incident happened?</p> <p>5 A Yes.</p> <p>6 Q Did Paul have any other of his articles, clothes,</p> <p>7 any items belonging to him still at your house?</p> <p>8 A Not that I know of.</p> <p>9 Q And when I say "your house," of course I mean the</p> <p>10 house that you lived in.</p> <p>11 A Right.</p> <p>12 Q Could he have had items or articles at your house</p> <p>13 that you didn't know of?</p> <p>14 A Possibly.</p> <p>15 Q How long did it take Paul to move out?</p> <p>16 A He was -- one day. I mean, he was gone, poof.</p> <p>17 Q And how long had he been gone?</p> <p>18 A Two days, two and a half days, something like</p> <p>19 that.</p> <p>20 Q Okay. So he had been gone two days or two and a</p> <p>21 half days prior to this incident?</p> <p>22 A Right.</p> <p>23 Q Had he come back at any time in that time?</p> <p>24 A No.</p> <p>25 Q On the day in question, July 30th, had he been at</p>

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Page

1 the house at any time prior to the incident?  
2 A No. Not that I know of, anyway.  
3 Q How long were you at the house that day prior to  
4 the incident?  
5 A Almost all day, because Linda had to have care  
6 almost all the time.  
7 Q Okay. And do you recall leaving the house at any  
8 time?  
9 A No. Only -- if I did, it would be to go to the  
10 grocery store.  
11 Q Okay. And I'm going to take it just a step back  
12 here.  
13 You had said that Linda needed care.  
14 A Yes.  
15 Q What type of care did you provide Linda?  
16 A I bathed her, I fed her. Oh, geez. Made sure she  
17 had her pills and -- you know, just the normal -- well, not  
18 normal, nothing's normal on that case. Anyway -- because  
19 she couldn't see out of one eye, she had a split retina, and  
20 her cognizance, and her going to the bathroom wasn't good,  
21 and I did give her showers, because she wouldn't get in the  
22 shower.  
23 Q Okay. Did Linda give you any kind of compensation  
24 for this kind of in-home care?  
25 A No.

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Page

1 Q Did she reduce the rent that you paid her for this  
2 kind of in-home care?  
3 A No.  
4 Q And what was the rent you were paying her?  
5 A I was paying two-fifty out of five.  
6 Q What does that mean?  
7 A Well, rent's 500.  
8 Q Okay.  
9 A And, at the time, she was paying 250 and I was  
10 paying 250.  
11 Q To whom?  
12 A Dawn Motes.  
13 Q And is Dawn Motes the owner of the property?  
14 A Yes.  
15 Q D-A-W-N or D-O-N?  
16 A D-A-W-N.  
17 Q And the rent total was \$500?  
18 A Right.  
19 Q And you were splitting it?  
20 A Right.  
21 Q Okay. Do you now pay the full \$500?  
22 A Yes, I do.  
23 Q Did you say earlier you paid that money to Linda?  
24 A Yes.  
25 Q And Linda gives it to Dawn?

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Page

1 A Right.  
2 Q Okay. Who is taking care of Linda now?  
3 A She's being taken care of down in Daytona at a  
4 rest home on Third Street. I'm not sure of the name of it.  
5 Q And why did she move from your -- from the  
6 residence you shared?  
7 A Because I could not take care of her like I was  
8 taking care of her.  
9 Q Okay.  
10 A And I finally got her a place through the county,  
11 because she had no money to get one -- you know, to go to a  
12 home.  
13 Q Okay. During the time that Mr. Hillman lived with  
14 you-all, did you ever have arguments with him?  
15 A No.  
16 Q Did you ever fight with him?  
17 A No.  
18 Q Did he ever argue with Linda?  
19 A No.  
20 Q Did Linda ever yell, argue, complain about him?  
21 A No.  
22 Q Did he ever help take care of Linda?  
23 A No.  
24 Q Did he ever work?  
25 A He got a job two days -- when he went -- the day

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1 before he left, he got a job doing tree work or something  
2 like that. And then after that, he had enough money to go  
3 get a room.  
4 Q And he never paid you nor Linda anything?  
5 A No. The fact is, I gave him \$10 the day before --  
6 because he just started his job, I gave him \$10 so he could  
7 have cigarettes and food for lunch or whatever.  
8 Q So the night in question, do you recall if your  
9 front door was open?  
10 A It was unlocked.  
11 Q But it was closed?  
12 A Yes.  
13 Q Okay. Can you tell me the first thing you saw,  
14 heard, smelled, felt the night of the incident when you  
15 first encountered Paul Hillman?  
16 A Yeah. He came in the house, pointed a gun at me,  
17 a rifle, and said I was evil and needed to die. And I  
18 thought he was kidding, so I said, Oh, get that out of my  
19 face, and I, like, pushed the gun away, and that's when he  
20 turned around and smacked me in the head and put a bunch of  
21 stitches up here (gesturing), and a broken nose. Then he  
22 pulled my hammer, which he got off the porch, and started  
23 hitting me.  
24 Q And he opened up the door --  
25 A Yes.

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1	Q -- and walked in?	1	A Get that out of my face. Because I thought he was
2	A Yes.	2	just joking around. You know. And I said, Get that out of
3	Q Did he knock on the door?	3	my face, went like that (gesturing), and he turned and hit
4	A No.	4	me with the butt of it.
5	Q Was he allowed to be in your house?	5	Q Did you ever -- well, let me ask you this: Were
6	A Yeah. I mean, I thought he was a friend.	6	you seated --
7	Q Okay. Did you know he was coming by that night?	7	A Yes.
8	A No.	8	Q -- or standing?
9	Q Were you -- had you been drinking alcohol that	9	A I was seated.
10	night?	10	Q Did you ever, at some point, stand up?
11	A No.	11	A Oh, yeah, I stood up after he whacked me with the
12	Q None whatsoever?	12	gun barrel.
13	A None whatsoever. We had just finished watching --	13	Q So you were hit before you stood up?
14	Linda liked watching wrestling, and we just finished	14	A Yes.
15	watching that.	15	Q And you were hit with the barrel or the butt end
16	Q Did you say Linda Lake?	16	of the gun?
17	A Linda, not Lake.	17	A Butt. The butt end of the gun.
18	Q Understood.	18	Q And once you were hit with the butt end of the
19	A She liked to watch wrestling.	19	gun, what did you do?
20	Q Had she been drinking at all that night?	20	A I stood up and turned, and he pulled my hammer out
21	A No. She didn't drink.	21	of his belt and started whacking me.
22	Q Were you on any prescribed medication?	22	Q Did you ever grab for the gun?
23	A No.	23	A No. I was trying to save myself, get out of the
24	Q Were you on any narcotics; any illegal narcotics?	24	way of it. You know.
25	A No.	25	Q Okay.

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1	Q Okay. When you first saw Mr. Hillman, you say he	1	A He broke these two fingers (gesturing) -- you can
2	had a gun in his hand and he was pointing it at you?	2	see the roundness of it -- because I put my hand up like
3	A He had a rifle in his hand pointing it at me.	3	that (gesturing) after he hit me once.
4	Q Did you recognize the rifle?	4	Q Just --
5	A Yes.	5	MR. PRICE: The witness is identifying his
6	Q And how did you recognize the rifle?	6	left ring and middle finger.
7	A Because he had it at the house early in the month.	7	BY MR. PRICE:
8	Q Earlier that month?	8	Q Is that correct?
9	A Yeah.	9	A Yes.
10	Q And whose rifle was it?	10	Q Okay. So you never grabbed for the gun?
11	A I have no idea. It was a .22 rifle.	11	A I went like that (gesturing), pushed the gun out
12	Q And how did you come by that information?	12	of the way, because I thought he was kidding when he said I
13	A Because I seen the gun.	13	was evil and I needed to die and he pointed it at me. I
14	Q So you were able to tell of the caliber?	14	went, Get that out of my face (gesturing). You know.
15	A Yeah.	15	MR. PRICE: The witness is making a
16	Q Okay.	16	swiping motion with his right arm.
17	A I knew what it was.	17	BY MR. PRICE:
18	Q And you had seen Mr. Hillman possess the gun	18	Q At any point, did you ever possess the gun?
19	earlier that month?	19	A No.
20	A Right.	20	Q At any point, did you ever possess the hammer?
21	Q And he pointed that gun into your face?	21	A No.
22	A Yes.	22	Q Okay. When you got up out of the chair, did you
23	Q And he said, again --	23	fall?
24	A I was evil and I needed to die.	24	A Yeah. I came around, fell over the side of the
25	Q And then what was your response to that?	25	bed where he beat the hell out of me.

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1 Q Okay. So I just want to make sure that the  
2 sequence of events is correct.  
3 You're seated in the chair, he hits you with the  
4 butt, you make the swiping motion with your --  
5 A No. Swiping motion before he hit me.  
6 Q I see. And then you were hit with the butt.  
7 A (Witness nods head.)  
8 Q Then you get up out of the chair. Correct?  
9 A (Witness nods head.)  
10 Q Yes?  
11 A Yes.  
12 Q And then did you then fall down?  
13 A I -- I don't really know. After seeing -- after,  
14 you know, jumping up, turning to get away from him -- then  
15 when I was turning, I seen him pulling the hammer out of his  
16 belt, and I don't remember nothing until he hit Linda and  
17 told her to shut up or else he was going -- she was going to  
18 get the same thing I got.  
19 Q Okay.  
20 A And that woke me up, and I got up, and he was  
21 gone.  
22 Q Do you recall whether you fell by, or onto, or  
23 next to the bed?  
24 A Next to the bed.  
25 Q Next to the bed.

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1 Do you recall if you hit your head at all?  
2 A Nope.  
3 Q Did you ever fall into the T.V. or --  
4 A No.  
5 Q -- the T.V. stand?  
6 A Uh-uh.  
7 Q Did you recognize the hammer?  
8 A Yes.  
9 Q And how did you recognize the hammer?  
10 A Because it was mine.  
11 Q Where was the hammer?  
12 A Out on the front porch.  
13 Q Is that where you last used it?  
14 A Yeah.  
15 Q Okay. And the hammer was where on the defendant;  
16 on Mr. Hillman?  
17 A He had it in his belt.  
18 Q Okay. So was the handle part tucked in his belt?  
19 A Yes.  
20 Q And the head of the hammer was outside of the  
21 belt?  
22 A Right.  
23 Q Okay. Once he hit you with the butt of the gun,  
24 do you recall if he ever hit you with the gun again?  
25 A No.

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1 Q Did he ever pull the trigger of the gun?  
2 A No.  
3 Q Do you know if the gun was operable?  
4 A I don't think it was, because he left the bolt out  
5 in the yard for two weeks. So I don't think it was.  
6 Q Okay. Do you recall how many times he hit you  
7 with the hammer?  
8 A No.  
9 Q And how many injuries did you sustain this night?  
10 A How many injuries? Well, besides getting hit just  
11 behind the temple where they had to give me stitches there,  
12 my two fingers, broken nose, stitches above my eye, and they  
13 put me -- because he hit me so many times with the hammer in  
14 my legs and the sides, they put me in a -- they flew me up  
15 to Gainesville after releasing me from the hospital here.  
16 They flew me straight to Gainesville where they put me in a  
17 bunch of tests and whatever.  
18 Q They flew you in a helicopter?  
19 A Oh, yeah.  
20 Q This night you were seen by rescue and medical  
21 personnel?  
22 A Yes.  
23 Q And then were you taken to the hospital?  
24 A Yes.  
25 Q And were you released from the hospital at some

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Page

1 point?  
2 A Which hospital?  
3 Q Well, what hospital were you --  
4 A The first hospital?  
5 Q What hospital were you taken to first?  
6 A The one here in Palm Coast.  
7 Q Palm Coast?  
8 A Right.  
9 Q And then from there, when you were released there,  
10 where did you go?  
11 A Into a helicopter and flown to Gainesville.  
12 Q And you were flown from the hospital in Flagler --  
13 A Right.  
14 Q -- to the hospital in Gainesville?  
15 A Right.  
16 Q And what happened in Gainesville, medically?  
17 A Well, they put me through, you know, that tube  
18 thing and a bunch of other things.  
19 Q What kind of tube thing?  
20 A I don't know. The thing they stick you in and  
21 make sure your head's okay and all that.  
22 Q Oh, you got a CT scan?  
23 A Yeah, right.  
24 Q Okay. So after the CT scan and the tests that  
25 were taken in Gainesville, where did you go?

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Page

1 A They kept me there for two days.  
2 Q Okay. And then were you discharged from that  
3 hospital?  
4 A Yes.  
5 Q Okay. Have you had any follow-up tests or  
6 anything?  
7 A No.  
8 Q Okay. Going back to the night.  
9 What did you witness, if anything, Mr. Hillman do  
10 to Ms. Warrell?  
11 A Well, I was out, I guess. I had to have been.  
12 But I woke up as he was yelling at her, and I heard a thump  
13 where he smacked her upside of the head with the rifle.  
14 Q Did you see that?  
15 A No. But I heard it.  
16 Q Okay.  
17 A And that woke me up, him yelling at her telling  
18 her, Shut up, don't say anything or else you're going to get  
19 the same thing he got.  
20 Q So when he first came in, he mentioned that he  
21 said you're evil and needed to die.  
22 A Right.  
23 Q Did he say anything else after that?  
24 A Not that I know of.  
25 Q So next thing you heard him say was the things he

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Page

1 was saying to Ms. Warrell?  
2 A Yes.  
3 Q And those were again?  
4 A Shut up or you're going to get the same thing he  
5 got.  
6 Q What was Ms. Warrell saying to cause him to say  
7 that to her?  
8 A Nothing that I know of. And she could have said  
9 something while I was out, but she didn't -- couldn't have  
10 seen him in the first place, couldn't see what he was doing.  
11 Q And after you heard him hit Ms. Warrell, were you  
12 hit again?  
13 A No.  
14 Q After you heard that hit from Ms. Warrell, what  
15 happened?  
16 A I got up, he was gone, and I went out and somehow  
17 found my phone and called 9-1-1.  
18 Q There was a broken vodka bottle in the front yard  
19 of the house. Was that there that day?  
20 A No.  
21 Q Do you drink vodka?  
22 A Yes. But not that type.  
23 Q Okay.  
24 A I can't afford that.  
25 Q Okay. So you were able to ascertain what type it

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Page

1 was?  
2 A I don't remember what type it was, but it was in a  
3 glass bottle. I usually get plastic ones.  
4 Q Okay.  
5 A You know. But, no, that was definitely his.  
6 Q Okay. I'm going to ask you some questions that  
7 are speculation.  
8 A Okay.  
9 Q And just answer to the best of your ability.  
10 A All right.  
11 Q Do you have any idea why Mr. Hillman would have  
12 done this?  
13 A None, whatsoever, because all I did was try to be  
14 good and help him.  
15 Q Okay.  
16 A That's my nature.  
17 Q So, prior to this incident, you and Mr. Hillman  
18 never had bad words?  
19 A No.  
20 Q You weren't in the middle of an argument or  
21 disagreement?  
22 A No.  
23 Q Did you owe him any money?  
24 A No.  
25 Q Did he owe you money?

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Page

1 A Yes.  
2 Q And how much money did he owe you?  
3 A Oh, about ten bucks.  
4 Q Had you ever seen Mr. Hillman act aggressive  
5 before?  
6 A No.  
7 Q Had you ever seen Mr. Hillman under the influence  
8 of alcohol?  
9 A No.  
10 Q Had Mr. Hillman ever accused you of being evil  
11 before?  
12 A No.  
13 Q Had Mr. Hillman ever had aggressive or mean words  
14 with Linda?  
15 A Not that I know of.  
16 Q The night in question, there was a police report  
17 taken and some statements given that was recorded. Do you  
18 recall speaking with law enforcement that night?  
19 A Not really.  
20 Q Okay. One of the things that was told to law  
21 enforcement was that Mr. Hillman came in and asked -- he  
22 needed -- demanded that he needed to know what was going on.  
23 Do you recall him saying that?  
24 A No.  
25 Q Okay. So if you had said that he needed to know

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Page

1 what was going on, you're saying that that's not what he  
2 said and don't remember him saying that?  
3 A I don't remember him saying it. I don't know if  
4 he did or not.  
5 Q Okay.  
6 A But I know that what he -- what I remember him  
7 saying was I was evil and needed to die.  
8 Q All right. And, again, there was no other reason,  
9 or no reason, whatsoever, that Mr. Hillman would have to  
10 come and attack you and/or Ms. Warrell. Correct?  
11 A Correct.  
12 Q Okay. Had he ever accused you of being aggressive  
13 towards Ms. Warrell?  
14 A Probably.  
15 Q Have you ever been aggressive towards Ms. Warrell?  
16 A Not -- what do you mean by aggressive?  
17 Q Have you ever battered her?  
18 A No.  
19 Q Have you ever been accused of hitting her?  
20 A No.  
21 Q Hurting her?  
22 A No.  
23 Q Has law enforcement ever been called out to the  
24 house to investigate abuse?  
25 A Yes.

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1 Q And can you tell me what that alleged abuse was?  
2 A The abuse was, she bruised real easily, and she  
3 couldn't see very well, and she'd fall, and getting her up  
4 or whatever, she'd get bruises on her. But that wasn't from  
5 me hitting her or anything like that.  
6 Q Who notified the authorities?  
7 A We went to the free clinic, and the free clinic  
8 saw the bruises and said, Oh, he's been battering her. But  
9 they figured that all out, and that was all dropped.  
10 Q How many times have the authorities, meaning law  
11 enforcement, Department of Children and Families, or any  
12 authority been to the house to investigate alleged abuse?  
13 A Once.  
14 Q Have there ever been any other people to allege  
15 that you have abused Linda Warrell?  
16 A No.  
17 Q Has there ever been a time where you discussed  
18 this alleged abuse with law enforcement authorities?  
19 A Yeah.  
20 Q And have you given --  
21 A When they came and talked to me about it.  
22 Q Was this the Flagler County Sheriff's Office?  
23 A Yes.  
24 Q And were you given case cards and case  
25 information?

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1 A Yes.  
2 Q Okay. And how many times has that happened?  
3 A Once.  
4 Q All right. And were you ever charged criminally?  
5 A No.  
6 Q And was there ever a -- I think it's Agencies for  
7 Persons with Disabilities, or perhaps Department of Children  
8 and Families. Did they ever get involved and ask you  
9 questions?  
10 A No.  
11 Q Okay.  
12 A Well, actually, I think -- the Child Services, I  
13 think the gentleman came out there a couple times, but that  
14 wasn't because of me.  
15 Q And what was that for?  
16 A That was because of our arrangement -- our  
17 plumbing, and electrical, and things like that.  
18 Q To your knowledge, was Linda getting government  
19 assistance?  
20 A No, she was not.  
21 Q Any kind of Federal assistance?  
22 A No.  
23 Q State?  
24 A Nothing.  
25 Q Were you?

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1 A No. I am now. I'm getting Social Security.  
2 Q Is that Social Security based on age?  
3 A Yes.  
4 Q Okay. Not disability?  
5 A No.  
6 Q And Linda wasn't getting any disability?  
7 A No.  
8 Q And how does Linda care for herself financially?  
9 A Well, she had a fund set up for her, which she --  
10 apparently her uncle was the whatever -- the guy that took  
11 care of it.  
12 Q Like a trust?  
13 A Yeah, trust. And he was in -- he was involved  
14 with that, and he would send the money down for the rent,  
15 and, you know.  
16 Q Any other money besides the rent money?  
17 A No.  
18 Q How was food and utilities being paid for?  
19 A The utilities came with the rent.  
20 Q Okay.  
21 A Food, we'd get -- we'd go to the food bank.  
22 Q Okay.  
23 A And we had -- I had Linda set up for one week and  
24 me set up for the next week. So we always had plenty of  
25 food.



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1 Q Do you know the name of Linda's uncle who set up  
2 this trust fund?  
3 A No. I know it's Mr. Warrell, but -- John Warrell.  
4 Q And where would the money go to; a bank account or  
5 cash?  
6 A No. It would go straight to Dawn Motes.  
7 Q So John Warrell would send money to Dawn Motes?  
8 A Right.  
9 Q And what about the money for other living  
10 necessities, clothes, things like that?  
11 A Didn't get it.  
12 Q So Linda had \$250 paid to Dawn --  
13 A No, she had \$500 paid to Dawn, and I'd give Linda  
14 250.  
15 Q Okay. So Linda essentially lived on \$250 a month?  
16 A Right.  
17 Q And no other money?  
18 A Right.  
19 Q Were you working at the time?  
20 A No.  
21 Q What other money were you getting?  
22 A None.  
23 Q How were you living month to month?  
24 A Hand to mouth.  
25 Q How were you making the \$250 you were giving

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1 Linda?  
2 A Out of my Social Security.  
3 Q Okay. So you were getting Social Security back  
4 then?  
5 A Yes.  
6 Q All right. And what was the amount of Social  
7 Security you were getting?  
8 A I get \$703 a month.  
9 Q All right. So of your 703, you were giving Linda  
10 250?  
11 A Right.  
12 Q And she was living solely on the 250, and you were  
13 living solely on the difference between 250 and 703?  
14 A Right.  
15 Q Okay.  
16 A But I was also buying cat food, and doing all the  
17 other things, you know, for the house; roach spray, rat  
18 traps, you know.  
19 MR. PRICE: Okay. Just a second, please.  
20 (A pause in the proceedings.)  
21 BY MR. PRICE:  
22 Q Do you know if law enforcement ever spoke with  
23 Linda in reference to the alleged abuse committed by you?  
24 A Alleged. Well, I'm sure they did -- yeah, they  
25 came and talked to her.

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1 Q Okay.  
2 A You know, while I sat outside and talked to the  
3 other law enforcement.  
4 Q Okay.  
5 A Yeah, they did.  
6 Q Did you ever, at some point -- going back to when  
7 Mr. Hillman came into the house, did you ever, at some  
8 point, tell him that you'd take the gun and shove it up his  
9 ass?  
10 A No.  
11 Q All right. And you knew it was Mr. Hillman?  
12 A Yeah.  
13 Q Okay. So there's no question about that?  
14 A Oh, yeah, no question at all.  
15 Q All right.  
16 A It was Paul.  
17 Q I'm sorry?  
18 A It was Paul.  
19 Q Okay.  
20 MR. PRICE: All right. I have nothing  
21 further.  
22 MS. TELFER: I have no questions.  
23 THE WITNESS: Okay.  
24 MR. PRICE: All right. So, at this point,  
25 you have an option. The court reporter has


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1 taken down everything we've said.  
2 THE WITNESS: Okay.  
3 MR. PRICE: And she's going to prepare  
4 that in a booklet called a transcript. And  
5 before she prepares that, you have the right to  
6 read it to make sure that she's typed down  
7 everything you said correctly. Now, you can't  
8 add something or change something, but if she's  
9 typed down the wrong word, like you said  
10 "green" and she typed down "red," then she'll  
11 give you what's called an errata sheet where  
12 you can say, no, that's not what I said, I said  
13 red.  
14 Most people waive that.  
15 She has -- she's a professional, she has  
16 many years of experience, she doesn't work for  
17 the State, and she doesn't work for me. She's  
18 a neutral party. But you still can read that  
19 transcript.  
20 Would you like to read it before it's  
21 published, or would you waive that reading?  
22 THE WITNESS: I'll waive it, because I  
23 don't believe I've said anything that was not  
24 true.  
25 MR. PRICE: Okay.


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1 (WHEREUPON, the deposition was concluded at  
2 9:53 a.m.)  
3 STIPULATIONS  
4 IT IS HEREBY AGREED and so stipulated by and between  
5 the parties hereto through their respective counsel  
6 that the reading and signing of the deposition is  
7 hereby waived.  
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1 REPORTER'S DEPOSITION CERTIFICATE  
2  
3 STATE OF FLORIDA )  
4 COUNTY OF FLAGLER )  
5  
6 I, Melanie E. Szafran, Court Reporter and Notary  
7 Public in and for the State of Florida at large, hereby  
8 certify that the witness appeared before me for the taking  
9 of the foregoing deposition, and that I was authorized to  
10 and did stenographically and electronically report the  
11 deposition, and that the transcript is a true and complete  
12 record of my stenographic notes and recordings thereof.  
13 I FURTHER CERTIFY that I am neither an attorney, nor  
14 counsel for the parties to this cause, nor a relative or  
15 employee of any attorney or party connected with this  
16 litigation, nor am I financially interested in the outcome  
17 of this action.  
18 DATED THIS 9th day of May, 2016.  
19  
20   
21 \_\_\_\_\_  
22 Melanie E. Szafran, RPR  
23  
24  
25

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1 CERTIFICATE OF REPORTER OATH  
2  
3 STATE OF FLORIDA )  
4 COUNTY OF FLAGLER )  
5  
6 I, the undersigned authority, hereby certify that  
7 the witness named herein personally appeared before me and  
8 was duly sworn.  
9  
10 WITNESS my hand and official seal this 9th day  
11 of May, 2016.  
12  
13  
14  
15   
16 \_\_\_\_\_  
17 Melanie E. Szafran  
18 Notary Public - State of Florida  
19 Commission No. EE 194487  
20 Expires: August 11, 2016  
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