

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

3 Case No.: 2015-627-CFFA

4 STATE OF FLORIDA,

5 -VS-

6 PAUL ANDREW HILLMAN,

7 Defendant.
8 _____/

9
10
11 DEPOSITION OF LINDA WARRELL

12 Taken on Behalf of the Defendant

13
14 DATE TAKEN: June 22, 2016

15 TIME: 11:03 A.M. - 11:37 A.M.

16 PLACE: Office of the State Attorney
17 251 North Ridgewood Avenue
18 Daytona Beach, Florida

19
20
21
22
23
24 Stenographically Reported by Deborah Warren
25 Registered Professional Reporter

Page 2

1 APPEARANCES:

2

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Page 3

1 I N D E X

2 TESTIMONY OF LINDA WARRELL

3 Direct Examination by Mr. Price 4

4

5 CERTIFICATE OF REPORTER OATH 35

6 REPORTER'S DEPOSITION CERTIFICATE 36

7

8 E X H I B I T S

9 (NONE)

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17 S T I P U L A T I O N S

18 It is hereby agreed and so stipulated by and

19 between the parties hereto, through their respective

20 counsel, that the reading and signing of the transcript

21 are expressly waived by the Deponent.

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1 P R O C E E D I N G S

2 THE COURT REPORTER: Please raise your right

3 hand. Do you solemnly swear the testimony you

4 shall give in this cause will be the truth, the

5 whole truth and nothing but the truth?

6 THE WITNESS: I do.

7 LINDA WARRELL, called as a witness by the Defendant,

8 having been first duly sworn, testified as follows:

9 MR. PRICE: All right. Can we start with

10 people stating their names on the record.

11 MS. HILL: Maddy Hill.

12 MR. PRICE: You are with?

13 MS. HILL: State attorney's victim advocate.

14 MS. WARRELL: Linda Warrell.

15 D I R E C T E X A M I N A T I O N

16 BY MR. PRICE:

17 Q. Ms. Warrell, have you ever given a deposition

18 before?

19 A. Yes, I have.

20 Q. What kind of case?

21 A. I've been here in Flagler County.

22 Q. What kind of case was that?

23 A. Same one.

24 Q. This case?

25 A. Yes.

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1 Q. Okay. Have you ever given a deposition in any

2 other cases beside this one?

3 A. No.

4 Q. Okay. Where are you from, Ms. Warrell?

5 A. Flagler County.

6 Q. Have you lived there your whole life?

7 A. Yes.

8 Q. Okay. And do you have any disabilities we

9 need for know about?

10 A. Yes.

11 Q. What are they?

12 A. I'm blind, half blind.

13 Q. You're half blind?

14 A. Yeah.

15 Q. In which eye?

16 A. Right here.

17 Q. Witness is pointing to her left eye.

18 A. Yes.

19 Q. Can you see at all?

20 A. I see a little bit.

21 Q. Are there any other deformities? Do you have

22 any medical conditions that we need to know about?

23 A. No.

24 Q. What kind of work do you do or have you done

25 in the past?

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1	A. I just worked at KFC.	1	Q. Can you guesstimate, estimate?
2	Q. How long did you work there?	2	A. I don't know. I can't, no.
3	A. Not too long.	3	Q. Years, months?
4	Q. How long ago was that?	4	A. At least a couple years.
5	A. I'd say about a month and a half.	5	Q. How did you meet George?
6	Q. Month and a half ago?	6	A. He was my roommate.
7	A. Yeah.	7	Q. How did you meet him before he was your
8	Q. What did you do at KFC about a month and a	8	roommate?
9	half ago?	9	A. I don't know. That, I can't answer. He used
10	A. Served chicken.	10	to be a friend of Paul Hillman's.
11	Q. How did you get to KFC?	11	Q. He was a friend of Paul Hillman's before you
12	A. I rode my bike.	12	lived with him in the house?
13	Q. All right.	13	A. Yes.
14	A. Then I got in a fight.	14	Q. And did you pay rent at this house?
15	Q. Do you have a driver's license to drive a car?	15	A. Yes, I did.
16	A. No, I do not.	16	Q. How much rent did you pay?
17	Q. So you get around by riding your bicycle?	17	A. Not too much, not too much because I told him
18	A. Yes, sir.	18	I wasn't going to pay.
19	Q. Okay. And what made you stop working at KFC?	19	Q. You told whom you weren't going to pay?
20	A. Well, one, I got fired. I got fired for	20	A. Dawn Motes.
21	giving away a piece of chicken, which I think is very	21	Q. How much rent did you owe to Dawn Motes per
22	stupid.	22	month to live in the house?
23	Q. Did you say you also got in a fight?	23	A. About \$300.
24	A. Yes.	24	Q. Did you pay Dawn Motes the \$300?
25	Q. What kind of fight and where?	25	A. I did not, he did.
Page 7		Page 9	
1	A. At the house, Flagler County.	1	Q. George paid?
2	Q. Is that the fight we're talking about here	2	A. Yes.
3	today?	3	Q. Did you give George money to pay Dawn Motes?
4	A. Yes.	4	A. No, I did not. I will not give no money to a
5	Q. That happened last year?	5	person like that.
6	A. I think so.	6	Q. Did you ever give George money?
7	Q. All right. And did that affect your job at	7	A. No, never.
8	KFC?	8	Q. You never gave George money?
9	A. I guess so because I ain't been back.	9	A. Yes, I did. Yes, I did. I gave him my -- to
10	Q. Okay. Where did this fight occur?	10	get my eyes fixed. But that canceled out because all my
11	A. At the house.	11	belongings were -- that canceled out. He don't get paid
12	Q. Where is that house?	12	for that.
13	A. My house where I used to live.	13	Q. Were you getting any kind of disability from
14	Q. How long did you live at that house?	14	the government?
15	A. A long time.	15	A. No.
16	Q. Why aren't you living there now?	16	Q. Were you getting any kind of subsidies or any
17	A. It's not fit to live in.	17	kind of money from any entity other than your job at
18	Q. Does anyone live there now?	18	KFC?
19	A. No, I don't think so.	19	A. From my uncle.
20	Q. Who were you living there with?	20	Q. How much were getting from your uncle?
21	A. George Carnarius.	21	A. As much as he can send me.
22	Q. How do you know George Carnarius?	22	Q. Did you ever have a trust fund --
23	A. He is my roommate.	23	A. Yes, I did.
24	Q. How long have you known him?	24	Q. -- in your name?
25	A. Oh, God.	25	A. But that's gone.

Page 10

1 Q. Did you ever give George money out of that
2 trust fund?
3 A. No, I did not.
4 Q. Did George every take money out of that trust
5 fund?
6 A. No, he did not.
7 Q. Did George ever get mad at you when this trust
8 fund was exhausted?
9 A. No, he did not. He was a sweet guy. He just
10 wanted his money back.
11 Q. George wanted his money back?
12 A. Yeah.
13 Q. From whom?
14 A. Me, for my eyes.
15 Q. How much money did you give -- or did you give
16 George?
17 A. I owed him \$50.
18 Q. Okay. Let me get this straight.
19 A. I owed him \$50, and he's not getting that
20 either.
21 Q. George gave you \$50 to get your eyes --
22 A. To go to the doctors, yes.
23 Q. But you never gave George any money to pay the
24 rent?
25 A. No.

Page 11

1 Q. And you never gave George any money for
2 anything else?
3 A. No.
4 Q. Did you ever give George money to get drugs?
5 A. No.
6 Q. Did you ever do drugs with George Carnarius?
7 A. Yes, I have.
8 Q. What kind of drugs did you do with him?
9 A. Meth.
10 Q. Anything else?
11 A. No. We did that with Paul Hillman, too.
12 Q. You did meth with George and Paul?
13 A. Yes.
14 Q. Where did you get the money to buy the meth?
15 A. George.
16 Q. Where did George get his money?
17 A. He's retired and he gets an allowance.
18 Q. What did you do with the money from your trust
19 fund?
20 A. I spent it.
21 Q. On what?
22 A. It wasn't on drugs.
23 Q. I'm sorry?
24 A. It wasn't on drugs.
25 Q. What did you do with the money?

Page 12

1 A. I spent it.
2 Q. On what?
3 A. Living arrangements.
4 Q. Did you say that you didn't give money to
5 George for rent?
6 A. No, I did not.
7 Q. So what did you spend on living arrangements?
8 A. I did give -- I got money to give to Dawn.
9 Q. How much money did you give Dawn each month?
10 A. I'm not sure. My went checks went to her
11 directly.
12 Q. What checks?
13 A. Checks from the account. My uncle sent her
14 check for me to live in that houses.
15 Q. Your uncle sent her a check each month?
16 A. Yes.
17 Q. Were you able to get money out of your trust
18 account?
19 A. No.
20 Q. Who was able to get money out of your trust
21 account?
22 A. Nobody, other than me. But I didn't need it.
23 Q. When did the money out of your trust
24 account --
25 A. It expired.

Page 13

1 Q. Expired?
2 A. Yes.
3 Q. Lack of a better term, when was the money
4 depleted?
5 A. Very shortly after -- very shortly after I
6 left there, it was all gone.
7 Q. Tell me again who was getting -- who was able
8 to get money out of that trust account?
9 A. Nobody.
10 Q. How did the money go away from the trust
11 account?
12 A. They tried to get the money from me, but I
13 don't know.
14 Q. Who is they?
15 A. George -- no, we I give none to George.
16 George didn't get nothing. Paul Hillman did not get
17 nothing. Dawn Motes did not get nothing. I think my
18 uncle sent her checks. I don't know how much he sent
19 her.
20 Q. Okay. Well, tell me about your relationship
21 with George?
22 A. George was a good friend.
23 Q. Were you ever romantically involved with
24 George?
25 A. No, I was not.

Page 14

1 Q. Did you ever become romantically involved with
2 him?

3 A. No.

4 Q. Has George ever abused you sexually?

5 A. No.

6 Q. He has never touched you in the tub or
7 anything like that?

8 A. He bathed me in the tub.

9 Q. Did he ever do anything --

10 A. No.

11 Q. -- against your will?

12 A. Nope. Nope, he has not.

13 Q. Did you ever get in arguments with George?

14 A. Yes, I have.

15 Q. What were those arguments over?

16 A. I don't know.

17 Q. Did George ever abuse you?

18 A. No.

19 Q. Did he ever hit you?

20 A. No. He knows I would slap him right down to
21 the floor.

22 Q. Was he ever verbally abusive to you?

23 A. No. Ain't too many people around me that can.

24 Q. How close were you to Dawn Motes?

25 A. I was pretty close to her because she said --

Page 15

1 she told me, if anybody is leaving, it's going to be
2 him.

3 Q. George?

4 A. Yup.

5 Q. Why did she say that?

6 A. Because I'm the one who pays. I've been
7 paying rent for over several years, and he just started
8 paying.

9 Q. So you never told Dawn that George was abusive
10 to you?

11 A. No.

12 Q. She wouldn't say that George was abusive to
13 you?

14 A. No, she wouldn't say that.

15 Q. All right. If anything -- if George was
16 abusive to you --

17 A. He wasn't.

18 Q. -- someone would hurt George, right?

19 A. Yeah.

20 Q. Okay.

21 A. In your case, Paul Hillman hurt George.

22 Q. Didn't he hurt George because George was
23 abusive to you?

24 A. No, it was not. He hit him when he thought he
25 was down.

Page 16

1 Q. Tell us about that particular evening. Do you
2 recall that?

3 A. Yes.

4 Q. And before you had any interactions with Paul
5 Hillman, what were you doing at your house with George?

6 A. I was just getting out of the shower.

7 Q. Was George helping you get out of the shower?

8 A. Yes.

9 Q. Were you having money problems during that
10 time?

11 A. No.

12 Q. Did you still have money in your trust account
13 at that time?

14 A. No.

15 Q. How were paying the rent?

16 A. I called my uncle to ask him to borrow some
17 money.

18 Q. Okay. Were you giving any money to George?

19 A. No.

20 Q. Were you or George getting any money from Paul
21 Hillman?

22 A. No.

23 Q. Were you renting him a place to live in the
24 house?

25 A. No.

Page 17

1 Q. Was Paul Hillman living with you?

2 A. He was living with George in his room, in his
3 room.

4 Q. Paul and George were in the same room?

5 A. Yes.

6 Q. This is not your room?

7 A. No.

8 Q. Was Paul giving George or you any money?

9 A. Not that I know of.

10 Q. So he wasn't giving you money?

11 A. No.

12 Q. He may have been giving George money?

13 A. He may have been giving George money. I don't
14 know that.

15 Q. Were Paul and George friends?

16 A. Yes, up to a certain point.

17 Q. Okay. So the night in question, how long had
18 Paul been living in George's room?

19 A. For -- I don't know, for awhile.

20 Q. Did they ever fuss or fight before?

21 A. No.

22 Q. Did they ever get into an argument before?

23 A. No.

24 Q. Was Paul ever abusive to you?

25 A. Only when he came to hit me. He came to hit

Page 18

1 me with his gun he had.
2 Q. Had you ever hit you before?
3 A. No.
4 Q. Had he ever accused George of hitting you
5 before?
6 A. No.
7 Q. So on this night in question --
8 A. Yes.
9 Q. -- you and George were at your house?
10 A. Yes.
11 Q. Was Paul living there?
12 A. No, not at this time.
13 Q. When did Paul leave?
14 A. He left -- he left to go to Sabina's house,
15 Sabrina Hall.
16 Q. Who is Sabrina?
17 A. Sabrina Hall is a lady that lives up the
18 street. She rents rooms out.
19 Q. So Paul left George's room --
20 A. Right.
21 Q. -- and went to live with Sabrina?
22 A. Yes.
23 Q. Do you recall what Paul was paying Sabrina to
24 live there?
25 A. No, I do not. Apparently, it wasn't much.

Page 19

1 Q. Did this make George angry?
2 A. No.
3 Q. George was not angry that Paul moved out?
4 A. No, he was relieved.
5 Q. George was relieved that Paul moved out?
6 A. Yes.
7 Q. Again, George and Paul were friends?
8 A. Yes.
9 Q. The night in question, when did Paul come over
10 to your house?
11 A. He came to my house and trying to break his
12 arms.
13 Q. Break George --
14 A. George's arm and hit me with a gun.
15 Q. Was Paul at the house before this happened?
16 A. Before it happened?
17 Q. Yeah.
18 A. No, he -- no. He was there, but when he came
19 in, he didn't say nothing, he didn't do nothing, just
20 was pouting and --
21 Q. Was Paul there visiting with George for
22 sometime before the incident took place?
23 A. No. He -- as soon as he came in, it was
24 only --
25 Q. So Paul didn't come by to visit for awhile and

Page 20

1 then leave and come back?
2 A. No. He kept straight there and did what he
3 had to do and left.
4 Q. Tell me exactly what he said, Paul?
5 A. Paul, he told me to be quiet. And he thought
6 I was going to say something. But he hit me with the
7 barrel of the gun.
8 Q. What's the first thing he said?
9 A. He said we were the devil.
10 Q. You and George were the devil?
11 A. George was the devil. George was the devil.
12 Q. Did he knock on the door when he came in?
13 A. No.
14 Q. Did he have the key to the house?
15 A. There ain't no key to the house.
16 Q. So the door wasn't locked?
17 A. No, it wasn't locked.
18 Q. So the first thing you heard Paul say when he
19 walked into the house was that George was the devil?
20 A. Yes.
21 Q. Is this before George said anything to Paul?
22 A. He said, get over it. He says -- I don't know
23 what the heck he was talking about. He acted so crazy.
24 Q. Is that the first time Paul had been to that
25 house that day?

Page 21

1 A. Yeah.
2 Q. He hadn't come by earlier?
3 A. I don't know. I don't think so.
4 Q. Were you with George the whole day?
5 A. Yes.
6 Q. So Paul and George did not speak or hang out
7 before this?
8 A. Not that I know of.
9 Q. All right. Was George drinking?
10 A. Probably.
11 Q. Were you drinking?
12 A. No.
13 Q. Was either George or you using drugs --
14 A. Probably.
15 Q. -- on the night in question?
16 A. I don't know.
17 Q. Probably?
18 A. Maybe.
19 Q. What if you were using drugs, what kind of
20 drugs would they have been?
21 A. Meth.
22 Q. Did Paul ever come to your house that night or
23 that day and use meth with George, use meth with you?
24 A. No.
25 Q. Paul never used meth?

	Page 22	Page 24
1 A. No, not with none of us. 2 Q. Not with any -- 3 A. No. 4 Q. Paul never used meth when you were with 5 George? 6 A. No, I don't think, not to my knowledge. 7 Q. How long was Paul there at the house that 8 night? 9 A. I don't know. 10 Q. A long time? A short time? 11 A. Just a short time. George washed his clothes 12 and made sure he had clean clothes every day. He got 13 up, made -- and I thought that was nice that George 14 would do that in a washing machine in the back yard and 15 he cleaned his clothes every day for him. 16 Q. Even when Paul moved out? 17 A. Yup. 18 Q. Okay. So Paul would come over to the house 19 each day, then, to get his clean clothes? 20 A. Yeah. 21 Q. Okay. Paul and George, again, were friends 22 and friendly, correct? 23 A. Yeah. 24 Q. Were they ever -- did they ever drink 25 together, Paul and George?	1 small. 2 Q. Are you sure it was a gun? 3 A. It was a gun. It was some type of a gun, but 4 it was -- I don't know what kind it was. 5 Q. Did he ever say anything to you? 6 A. He hit me in the head with it. 7 Q. What did he say to you? 8 A. Be quiet. He thought I was going to say 9 something. 10 Q. So you had not said anything? 11 A. No. 12 Q. But he said be quiet because he thought you 13 were going to say something? 14 A. Yes. 15 Q. What was he saying to George? 16 A. He was wailing at him. 17 Q. With what? 18 A. I'm not quite sure what it was. 19 Q. Was George saying anything to Paul? 20 A. Yeah. He said, what's a matter with you? 21 Q. How what did Paul respond with? 22 A. He just wailed at him, kept wailing at him. 23 Q. Did George say anything else to Paul? 24 A. No. 25 Q. Did George say anything else to you?	
	Page 23	Page 25
1 A. I don't remember. 2 Q. Okay. When -- we're going to go back and talk 3 about this in chronological order. The night in 4 question, you recall Paul coming in declaring that 5 George was the devil, correct? 6 A. Yes, yes. 7 Q. What happened right after that? 8 A. Right after that? 9 Q. Yes. 10 A. I had the police there at my door. 11 Q. What else did Paul do? 12 A. Oh, he hit me in the head with the gun. 13 Q. What kind of gun? 14 A. I don't know. It's a small gun like about 15 this big. 16 Q. So you're holding your hands out about 17 18-inches apart? 18 A. Yeah. 19 Q. Did you see the gun? 20 A. Yeah. 21 Q. And -- 22 A. He popped me in the head with it. 23 Q. Could you describe what it looked like? 24 A. It was -- no, I don't -- it wasn't a gun like 25 we was to find out in the street. It was something	1 A. No. 2 Q. Did George ever defend himself? 3 A. He couldn't, he was knocked out. 4 Q. George was knocked out completely? 5 A. Yeah, just about. Just about you can say 6 that, yeah. 7 Q. Did George ever hit Paul back or try to swing 8 back at him? 9 A. He should have. 10 Q. But he did not? 11 A. No. 12 Q. How long did this altercation or this fight 13 last? 14 A. Not too long because we had called the police. 15 Q. Did you call the police when Paul was still at 16 the house? 17 A. We called them -- yeah, I think so. 18 Q. Do you recall who called the police? 19 A. I don't know. 20 Q. Was it you or George? 21 A. It think it was George. 22 Q. Okay. And what did you and George do right 23 after Paul left the house? 24 A. What did we do? 25 Q. Yes.	

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1 A. He had to go to the Gainesville Hospital.
2 Q. Did you have to go to the hospital?
3 A. No. But I don't think going to jail is the
4 answer to his problems. He needs psychiatric help.
5 Q. What do you think should happen to Paul?
6 A. He needs psychiatric help. Normally he's a
7 nice fellow.
8 Q. What do you believe was wrong with Paul that
9 night?
10 A. I don't know. That, I don't know. He went
11 fruit cake over something.
12 Q. Why do you think Paul and George were fighting
13 that night?
14 A. Why do I think --
15 Q. -- Paul and George were for fighting that
16 night?
17 A. He swears he's with the Jewish Mafia, which is
18 ridiculous.
19 Q. So Paul thinks that George is with the Jewish
20 Mafia?
21 A. Yeah. Can't bother me in that respect.
22 Q. Had you ever seen Paul violent or angry
23 before?
24 A. No. Not like that, no.
25 Q. Okay.

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1 A. I like Paul. He's a nice fellow but not when
2 he's crazy. He just needs some help.
3 Q. Just want to make this absolutely clear.
4 You're saying that Paul was not at your house before the
5 fight took place?
6 A. No.
7 Q. Okay.
8 A. I did have a guard there.
9 Q. A guard?
10 A. Yes.
11 Q. What -- who or what is your guard?
12 A. A guard came to the house.
13 Q. That day?
14 A. That night.
15 Q. You mean a guardian ad litem from the
16 Department of Children & Families?
17 A. No, a guard, a guard and authority of God.
18 Q. A police officer?
19 A. Yes. George had to be sent to Gainesville
20 Hospital.
21 Q. Again, you were not receiving Social Security
22 benefits?
23 A. No.
24 Q. In fact, you had no other benefits other than
25 the trust account?

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1 A. That's right.
2 Q. Okay. Was George receiving Social Security
3 benefits?
4 A. Yes, he was, and that's why he gave Dawn
5 money.
6 Q. Did George ever confront Paul about Paul
7 giving Dawn money?
8 A. No.
9 Q. Were you aware if Paul gave Dawn money for
10 rent?
11 A. I don't know.
12 Q. Did you ever hear a conversation between
13 George and Paul --
14 A. About giving money?
15 Q. -- about Paul giving Dawn money?
16 A. No. If he gave any money, it was to Sabrina.
17 That's her sister.
18 Q. Okay.
19 A. Money gone out of any funds, it could be going
20 to her sister.
21 Q. How many bedrooms is in the house over there
22 at 9 Shady Lane?
23 A. How many bedrooms?
24 Q. Uh-huh.
25 A. Well, I guess two.

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1 Q. Did you have your own bedroom?
2 A. Yes. Maybe three, maybe three. But I had my
3 bedroom out in the front and he had his -- George had
4 his bedroom in the back. Yeah, maybe two or three.
5 Q. Are you still in contact with George?
6 A. I used to be.
7 Q. When is the last time you talked to George?
8 A. Long time.
9 Q. It's been a long time?
10 A. Yeah, because apparently he's moved somewhere.
11 The state's supposed to move him somewhere.
12 Q. Has George come to see you in your new
13 residence?
14 A. No. Only the day they dropped me off and
15 didn't come back.
16 Q. George dropped you off?
17 A. Yeah.
18 Q. Then didn't come back?
19 A. He brought my clothes here and then he left.
20 Normally Paul's a nice person if he's in his right mind.
21 I want that down, too.
22 Q. Okay. And I may have asked you this before, I
23 apologize if I have. Did George ever get upset when
24 your trust fund ran out?
25 A. No. I don't know. But I know he told me not

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1 to give nothing to Dawn.
2 Q. George told you not give anything to Dawn?
3 A. Yeah. She's the landlord.
4 Q. And your uncle was paying Dawn out of your
5 trust fund, correct?
6 A. Yes.
7 Q. So George told you not to give anything to
8 Dawn?
9 A. That's correct, not in the conditions we were
10 living in. There was no sense in giving her money for
11 nothing.
12 Q. And George never got mad at Paul for giving
13 money directly to Dawn and not George?
14 A. No, no, I don't think -- I don't know if
15 she -- if he gave her any money, he gave it to her
16 sister. He lived in her back room.
17 Q. Paul did?
18 A. Paul did.
19 Q. Paul moved out?
20 A. Yeah, and lived in Sabrina's back room.
21 Q. Right. Sabrina is Dawn's sister?
22 A. That's correct.
23 Q. Where was George getting the money to buy the
24 methamphetamines?
25 A. I guess a friend of ours.

Page 31

1 Q. Who would that be?
2 A. I'd rather not say.
3 Q. Was George using your money to buy
4 methamphetamines?
5 A. No.
6 Q. Ms. Warrell, were you ever convicted of a
7 fraudulent check?
8 A. Not that I know of.
9 Q. In South Carolina, Beaufort?
10 A. Beaufort?
11 Q. Yes.
12 A. I may have, I don't know.
13 Q. Could you been convicted of three fraudulent
14 check charges, all misdemeanors, in Beaufort, South
15 Carolina?
16 A. I don't know. That, I don't know. But
17 they're all paid for. They're all paid for. Whatever
18 the case may be, they're all paid for.
19 Q. Would you ever go back and live with George
20 again?
21 A. If the conditions were right.
22 Q. You don't fear George would hurt you?
23 A. No, would not hurt me, not any way, shape or
24 form.
25 Q. Is there anything else you want to tell me

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1 about this incident?
2 A. Yes. I would like to tell you that Paul
3 shouldn't be locked up.
4 Q. Should?
5 A. Should not.
6 Q. Should not be locked up?
7 A. He needs to go somewhere that can help him,
8 not hurt him.
9 Q. What is his problem that needs helping?
10 A. He needs to go to somewhere -- help -- for
11 some help, a mental place or something like that, but he
12 don't need to be in jail.
13 Q. Does Paul still remain your friend?
14 A. I still consider him a friend, even though he
15 hit me in the head.
16 Q. And even though he had moved out of your
17 house, was Paul welcome in your house?
18 A. Yeah, as long as he knows how to act.
19 Q. Would he often come over and visit you and
20 George?
21 A. Yeah.
22 Q. Was he allowed to just come in the front door
23 and visit you guys?
24 A. Yeah. I have no problem with that.
25 Q. Do you think Paul tried to kill you and

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1 George?
2 A. Yes, he did try to kill George. He tried to
3 kill George.
4 Q. Did he ever pull the trigger of the gun you
5 saw him have?
6 A. He never tried to pull the trigger, no. He
7 just popped me in the head with it.
8 Q. Did you ever hear the gunfire?
9 A. No.
10 Q. And maybe you mentioned this, I'm not sure. I
11 have to clarify. Are you sure that George was knocked
12 out unconscious?
13 A. He was knocked out. I know he was knocked
14 out.
15 Q. What happened after George --
16 A. He was bleeding.
17 Q. When he was unconscious, what did Paul do?
18 A. I think he got out -- got out of the house.
19 Q. Got out of the house?
20 A. He got scared and ran.
21 Q. Okay. Anything else you want to tell me?
22 A. Yes. I said I don't think he needs jail. He
23 needs the help. Jail is not the answer for the
24 situation.
25 Q. Do you think George needs help?

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1 A. No.

2 Q. Do you think George would hurt somebody?

3 A. If it came right down to it, if it came for

4 protection, I wouldn't blame him. But I don't think he

5 needs help, though.

6 Q. Do you know his family as well as George? Do

7 you know -- you ever met his family?

8 A. I met his family, yeah. His father died. I

9 used to go there all the time and do laundry.

10 Q. Are you still in communication with George's

11 family?

12 A. No.

13 MR. PRICE: I have nothing further.

14 MS. OPSAHL: I have no questions.

15 (WHEREUPON, there was an off-the-record

16 discussion.)

17 THE WITNESS: Waive.

18 THEREUPON, the deposition of LINDA WARRELL, taken

19 at the instance of the Defendant, was concluded at 11:37

20 a.m.

21 NOTE: The original and one copy of the foregoing

22 deposition will be held by Richard A. Price, Esquire.

23

24

25

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1 CERTIFICATE OF REPORTER OATH

2

3 STATE OF FLORIDA

4 COUNTY OF VOLUSIA

5

6 I, Deborah L. Warren, Notary Public, State of

7 Florida, hereby certify that the witness named herein

8 personally appeared before me and was duly sworn.

9

10

11 WITNESS my hand and official seal this

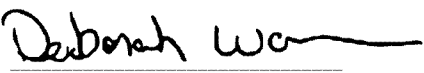
12 12th day of August, 2016.

13

14

15

16

17 

18

19 Deborah L. Warren

20 Notary Public - State of Florida

21 Commission No. FF 201205

22 Expires: April 30, 2019

23

24

25

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1 REPORTER'S DEPOSITION CERTIFICATE

2 STATE OF FLORIDA

3 COUNTY OF VOLUSIA

4

5 I, Deborah L. Warren, Court Reporter and Notary

6 Public in and for the State of Florida at Large, hereby

7 certify that the witness appeared before me for the

8 taking of the foregoing deposition, and that I was

9 authorized to and did stenographically and

10 electronically report the deposition, that a review of

11 the transcript WAS NOT requested, and that the

12 transcript is a true and complete record of my

13 stenographic notes and recordings thereof.

14 I FURTHER CERTIFY that I am neither an attorney,

15 nor counsel for the parties to this cause, nor a

16 relative or employee of any attorney or party connected

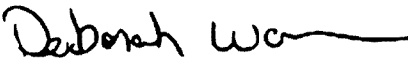
17 with this litigation, nor am I financially interested in

18 the outcome of this action.

19 DATED THIS 12th day of August, 2016, at Daytona

20 Beach, Volusia County, Florida.

21

22 

23

24 Deborah L. Warren, Court Reporter

25 U.S. LEGAL SUPPORT

<hr/> <p style="text-align: center;">\$</p> <hr/> <p>\$300 8:23,24 \$50 10:17,19, 21</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>11:37 34:19 18-inches 23:17</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>9 28:22</p> <hr/> <p style="text-align: center;">A</p> <hr/> <p>a.m. 34:20 absolutely 27:3 abuse 14:17 abused 14:4 abusive 14:22 15:9,12,16,23 17:24 account 12:13,18,21, 24 13:8,11 16:12 27:25 accused 18:4 act 32:18 acted 20:23 ad 27:15 advocate 4:13 affect 7:7 allowance 11:17 allowed 32:22 altercation 25:12 angry 19:1,3 26:22 apologize 29:23</p>	<p>apparently 18:25 29:10 argument 17:22 arguments 14:13,15 arm 19:14 arms 19:12 arrangements 12:3,7 attorney's 4:13 authority 27:17 aware 28:9 awhile 17:19 19:25</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>back 7:9 10:10,11 20:1 22:14 23:2 25:7,8 29:4, 15,18 30:16, 20 31:19 barrel 20:7 bathed 14:8 Beaufort 31:9,10,14 bedroom 29:1, 3,4 bedrooms 28:21,23 belongings 9:11 benefits 27:22,24 28:3 bicycle 6:17 big 23:15 bike 6:12 bit 5:20 blame 34:4 bleeding 33:16 blind 5:12,13</p>	<p>borrow 16:16 bother 26:21 break 19:11, 13 brought 29:19 buy 11:14 30:23 31:3</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>cake 26:11 call 25:15 called 4:7 16:16 25:14, 17,18 canceled 9:10,11 car 6:15 Carnarius 7:21,22 11:6 Carolina 31:9,15 case 4:20,22, 24 15:21 31:18 cases 5:2 charges 31:14 check 12:14, 15 31:7,14 checks 12:10, 12,13 13:18 chicken 6:10, 21 Children 27:16 chronological 23:3 clarify 33:11 clean 22:12, 19 cleaned 22:15 clear 27:3 close 14:24, 25 clothes 22:11,12,15,</p>	<p>19 29:19 communication 34:10 completely 25:4 concluded 34:19 conditions 5:22 30:9 31:21 confront 28:6 contact 29:5 conversation 28:12 convicted 31:6,13 copy 34:21 correct 22:22 23:5 30:5,9, 22 County 4:21 5:5 7:1 couple 8:4 COURT 4:2 crazy 20:23 27:2</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>Dawn 8:20,21, 24 9:3 12:8,9 13:17 14:24 15:9 28:4,7, 9,15 30:1,2, 4,8,13 Dawn's 30:21 day 20:25 21:4,23 22:12,15,19 27:13 29:14 declaring 23:4 defend 25:2 Defendant 4:7 34:19 deformities 5:21</p>
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