

1 IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
2 IN AND FOR ALACHUA COUNTY, FLORIDA

3 STATE OF FLORIDA,

4 Plaintiff,

5 v.

CASE NO. 01-2021-CF-3691-A

6 ANDRE ABRAMS, SR.,

7 Defendant.

8 _____/

9 DEPOSITION OF: M [REDACTED] E [REDACTED]

10 DATE: August 2, 2024

11 PLACE: 209 Southwest Second Street
12 Gainesville, Florida

13 APPEARANCES

14 On Behalf of the State:

15 Andrew McCain
16 Assistant State Attorney
17 120 West University Avenue
Gainesville, Florida 32601

18 On Behalf of the Defendant:

19 Aubroncee S. Martin
20 Assistant Public Defender
21 151 Southwest Second Avenue
22 Gainesville, Florida 32601

23
24
25

1 about this case?

2 A. Yes, sir.

3 Q. All right. So first question I'm going to ask
4 you is, have you ever given a deposition before?

5 A. No.

6 Q. All right. That's fine. So just quickly -

7 A. Wait. Like, that's like telling what happened?
8 Like -

9 Q. Yeah.

10 A. Oh, yes.

11 Q. Yeah. And you went to the state attorney's
12 office and you talked to -

13 A. Yes.

14 Q. Yeah. Okay. This is - this is like that, only
15 this is being recorded. I don't know if that was recorded
16 or not one way or the other. But this is being recorded.
17 You are under oath. And since this is only being recorded
18 by audio means, it's going to be important for you, when
19 you respond to a question, do so out loud and try to avoid
20 just shaking your head yes or no or going uh-huh or
21 uhn-uhn, because the court reporter not going to know what
22 you're talking about. All right?

23 A. Yes, sir.

24 Q. All right. So I'm going to start by asking you
25 a little bit about how - who you are, and then, we'll move

1 on to see what you know about this case, all right?

2 A. Yes, sir.

3 Q. All right. So what is your present address,
4 ma'am?

5 A. [REDACTED]. [REDACTED]

6 Q. How long you been living there?

7 A. For about a month.

8 Q. All right. Do you foresee yourself being there
9 for like the next six months or so?

10 A. Yes, sir.

11 Q. All right. And if we have additional questions,
12 what's a good phone number?

13 A. [REDACTED].

14 Q. [REDACTED]?

15 A. Yes, sir.

16 Q. [REDACTED]?

17 A. Yes, sir.

18 Q. All right. And what is your date of birth?

19 A. [REDACTED].

20 Q. And that makes you how old?

21 A. 18.

22 Q. And do you work, go to school? Both?

23 A. No, sir.

24 Q. So how do you support yourself? How do you make
25 it through the day? You live with your parents still? I

1 mean, what -

2 A. No, sir. I live on my own. Like, I don't have,
3 like a job on nobody else clock. I got my own business.
4 I do hair.

5 Q. There you go. Okay. That's what you do. You
6 do hair?

7 A. I do hair.

8 Q. All right. Please don't be offended by this. I
9 ask everyone this question. Have you ever been convicted
10 of a felony or a crime of dishonesty?

11 A. No, sir.

12 Q. All right. Do you do the braids?

13 A. Yes, sir.

14 Q. Yeah. My wife be gone for like 11 hours and I
15 don't know how you guys do it that long.

16 A. It don't take me 11 hours.

17 Q. It don't?

18 A. No.

19 Q. All right. So do you know Andre Abrams?

20 A. I know of him from living in a neighborhood,
21 yes.

22 Q. All right. So this incident, there's an
23 allegation that Mr. Abrams used what is - I've heard the
24 term "throwing and shooting" a flamethrower in the middle
25 of the road?

1 A. Yes, sir.

2 Q. And so you know about that situation?

3 A. Yes, sir.

4 Q. So why don't you tell me what you know about
5 that, then I'll follow up with specific questions if
6 necessary.

7 A. The one he was being charged for?

8 Q. Yes.

9 A. It was one day after school. It was me and my
10 cousins, A [REDACTED] S [REDACTED] and N [REDACTED] B [REDACTED] I was
11 sitting on the - behind the passenger side. I was sitting
12 on the passenger side. A [REDACTED] was in the front seat in the
13 driver's side and T [REDACTED] was behind the front seat with her
14 back turned towards the door. We were sitting and was
15 talking. And then, like a good couple of minutes go by,
16 and we just like, feel like heat. And like, we seen
17 like - but we already knew because he do it pretty often,
18 so we already knew it was him.

19 Q. But, I'm sorry. When you say "he," who are you
20 talking about?

21 A. I don't know how to say his name.

22 Q. Okay.

23 A. Andre Abrams.

24 Q. Okay.

25 A. Mr. Andre, yes. He - like, I didn't really get

1 a good look, but, like, I just know he was close enough to
2 where you could feel the heat from the car. And before I
3 could get out, T [REDACTED] had - or N [REDACTED] had already
4 jumped over me to get out the car. And [REDACTED] - A [REDACTED] went
5 through the driver's seat into the passenger seat and she
6 got out of the car, and then, I got out the car last.

7 Q. All right. So all this, how long did all this
8 take? By what - and let me ask you this. Did - you felt
9 the heat?

10 A. Yes.

11 Q. Or did you see Ms. B [REDACTED] leaping? Is that.
12 what - what caused your - got your attention first? The
13 girl jumping over you or the heat?

14 A. No, the heat. And when I looked up, like, you
15 can just see, like, orange go past the car, and then,
16 that's when she jumped over me.

17 Q. Okay.

18 A. And then I got out. I got out the car last.

19 Q. Okay. Then once you got out the car, what
20 happened?

21 A. We ran. We ran up to the porch and we had
22 knocked on the door and I think her mom came out - came
23 out. I don't - it was a while ago, so I really don't
24 know.

25 Q. I understand. Just do your - do your best.

1 A. I really don't remember. And I just know the
2 police was called and a couple of our friends had come
3 over and we were just sitting there. And then police
4 came. He was talking to the police, and then, I remember
5 the police asking him for his cameras and they went and
6 did that, and then, he got arrested and we wrote our
7 statements.

8 Q. Okay.

9 A. That's pretty much how I remember.

10 Q. Did Mr. Abrams ever say anything to you?

11 A. No.

12 Q. No?

13 A. Never said anything to me.

14 Q. All right. Is there any - did Mr. Abrams give
15 you any indication that he was aware that you - you and
16 your cousins were in the car?

17 A. Yes.

18 Q. Tell me about that.

19 A. He knew we was in the car because -

20 Q. Go ahead.

21 A. - because when we came - when we came - when we
22 pulled up, he was sitting on his porch like he always do.
23 So she made - she made a U-turn to the driveway, and then,
24 she parked on the side of the house, how we always park.
25 And we did not get out the car. We sat in the car. We

1 was talking. He was sitting on the porch watching us the
2 whole time. And I guess he didn't like the way we was
3 parked or anything, so he did that to make us move.

4 Q. So why didn't you get out the car?

5 A. Because we had just got out of school -

6 Q. Uh-huh.

7 A. - and we were just sitting there talking like we
8 always do.

9 Q. Just hanging out?

10 A. Yeah.

11 Q. All right. Was the car on or off?

12 A. The car was off.

13 Q. All right. Was the radio on or off?

14 A. No, the radio was off. We're talking.

15 Q. So the radio was off, the car was off?

16 A. Yes. Yes.

17 Q. Do you remember if the windows in the vehicle
18 were the up or down?

19 A. The front seat window - the driver's-side window
20 was rolled down. The window behind the driver's side was
21 rolled up. And then I think the other two - the other two
22 was rolled up as well.

23 Q. Okay. And once you got the car, was the - was
24 the flame - was it - was Mr. Abrams still shooting the
25 flame, or did he stop once you got out the car?

1 A. I don't even remember.

2 Q. You don't even remember?

3 A. No, sir.

4 Q. Just got out?

5 A. I just got out the car.

6 Q. Right. Have you ever had any issue with Mr.

7 Abrams yourself?

8 A. Yes.

9 Q. All right. Tell me about that.

10 A. Him and his flamethrower.

11 Q. Tell me about that then. The other issue.

12 A. It was one time, me, my little - me, my little
13 sister, and my little cousin, we walked through his yard
14 because it's like - it's - the house is like right close
15 by each other and if you just walk straight through the
16 houses, then you can walk all the way to my house through
17 the back street. We walked through his cameras - and we
18 walked through his cameras, I guess he seen us. He came
19 outside and he grabbed his flamethrower before he came
20 outside and he started spraying the flame at my little
21 cousin and my sister. But I was already like in the road.
22 They were walking behind me and I looked and I turned
23 around. So I started recording to make sure I wasn't
24 tripping. And I'm like - he's like aiming that
25 flamethrower at my sister. So I went in the house. I

1 showed my mom. Well, I told her at first she didn't
2 believe me until I showed her.

3 Q. Uh-huh.

4 A. And then that was it. And then him with the
5 flamethrower at the kids and stuff, when they playing in
6 the field next to his house. It was always him and his
7 flamethrower.

8 Q. Anything else you want to share with me?

9 A. No.

10 Q. That's a no?

11 A. It's just him and his flamethrower.

12 Q. Yes, ma'am. All right. Go ahead.

13 A. No.

14 Q. You look like you wanted to say something.

15 A. No, I had said yes.

16 Q. Okay. All right. So just to be clear, he never
17 said anything to you while you were in the car?

18 A. No. He never said anything to me.

19 Q. Once he got out - once you got out the car, you
20 don't remember if he was shooting or not?

21 A. No, I don't remember.

22 Q. All right. And you felt the heat from the
23 flamethrower?

24 A. Yes, sir, I did.

25 Q. Right. And Ms. B [REDACTED] jumped over you?

1 A. Yes, sir.

2 Q. Did she get out before you did?

3 A. Yes, she did.

4 Q. Okay. Whatever - and you got out the car and
5 you all - and you went to the house?

6 A. Yes. I went straight on the porch.

7 Q. All right. Anything else you want to add?

8 A. No, sir.

9 Q. All right.

10 MR. MARTIN: I appreciate your time. The state
11 attorney might have a question.

12 MR. MCCAIN: Do you still have the recording
13 that you made of the incident involving your cousin and
14 your little sister?

15 THE WITNESS: No, sir. I got a new phone.

16 MR. MCCAIN: Okay. Nothing else.

17 MR. MARTIN: All right. So thank you for
18 coming.

19 THE WITNESS: Thank you.

20 MR. MARTIN: Now, okay. So you have the
21 opportunity to, if this deposition is reduced to a
22 transcript, written down, typed up, then you have the
23 opportunity to review that transcript for any errors or
24 admissions. Now, you won't be able to actually change
25 what the transcript says, but there's a document called an

1 "errata sheet" that can be attached to the transcript in
2 which you can make note of all the errors that you see.
3 For example, if this transcript said you said bat, but you
4 said cat, you can make note of that. Or you can say,
5 also, all this was left out.

6 THE WITNESS: Yes, sir.

7 MR. MARTIN: Or you can trust that between the
8 recording and the skill of the court reporting, the fact
9 that you meant what you said when you said it, that
10 everything is correct and you can waive that, right.
11 Doesn't matter which one you do. You can read it or you
12 can waive it, but we just need to know which one you want
13 to do.

14 THE WITNESS: Okay.

15 MR. MARTIN: Which one do you want to do?

16 THE WITNESS: I - I trust it.

17 MR. MARTIN: All right. That's a waiver. All
18 right, ma'am, we appreciate your time. Thank you.

19 THE WITNESS: You're welcome.

20 MR. MARTIN: All right.

21 MR. MCCAIN: You all have a good day.

22 THE WITNESS: You as well.

23 MR. MARTIN: All right.

24 (The deposition was concluded.)

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE

STATE OF FLORIDA)
COUNTY OF SUWANNEE)

I, Jodi Moore, do hereby certify that the deposition of M [REDACTED] E [REDACTED], taken on August 2, 2024, in the case of State of Florida versus Andre Abrams, Sr., pending in the Circuit Court of the Eighth Judicial Circuit in and for Alachua County, Florida, Case No. 01-2021-CF-3691-A was transcribed by me and that the foregoing is true and accurate.

DATED THIS 2ND DAY OF FEBRUARY 2025.

Jodi Moore

Jodi Moore
Florida Digital Reporting, Inc.
209 Southwest Second Street
Gainesville, Florida 32601
352-336-0963