

1 Q. Venus? Venus, I'll use that. Okay, Ms. Grant,
2 once again, my name is Aubroncee Martin, and I will be
3 representing Mr. Andre Abrams. Now, Mr. Abrams have
4 been - has been charged with the offense of aggravated
5 assault with a deadly weapon. And your name was listed as
6 a person who have - might have some knowledge about this
7 case. Do you have some idea why you're here today?

8 A. Uh-huh.

9 Q. All right. So what we're going to do is that.
10 I'm going to ask you about what your knowledge of this
11 case is and I'm going to start off by asking a little
12 about who you are, and then, we'll move on to see what you
13 know about this case. All right. So one of my first
14 questions, have you ever given a deposition before?

15 A. Yes.

16 Q. All right.

17 A. (indiscernible)

18 Q. I'm sorry?

19 A. Yes.

20 Q. All right. So I'm going to move this microphone
21 a little closer to you. And just as a quick refresher,
22 this is only being recorded by audio means, so it's
23 important that when you respond to a question, you do so
24 out loud and you avoid shaking your head yes or no, or
25 going uh-huh or uhn-uhn. Okay?

1 A. Yes.

2 Q. All right. Thank you. All right. So, ma'am,
3 what's your present address?

4 A. The one I'm saying at now?

5 Q. Yes, ma'am.

6 A. .

7 Q. How long you been there?

8 A. Off and on.

9 Q. Do you - do you foresee yourself being there for
10 the next six months or so?

11 A. No.


12 Q. All right. Is there a place that if we need to
13 reach you, you have a - you have a notion of where that's
14 going to - where you're going to be at in the next six
15 months?

16 A. No, not really.


17 Q. All right. Is there a phone number we can reach
18 you at?

19 A. Yes.

20 Q. Okay. What's the number?

21 A. .

22 Q. .

23 A. .

24 Q. .

25 A. .

1 Q. [REDACTED]?

2 A. [REDACTED]-

3 Q. [REDACTED]? All right. And ma'am, what is your date of
4 birth?

5 A. February 25, 1966.

6 Q. And that makes you how old?

7 A. 58.

8 Q. 58? Are you married, ma'am?

9 A. Yes.

10 Q. All right. Any children?

11 A. Yes.

12 Q. All right. How many?

13 A. I have four.

14 Q. Are they - are they still young or they're
15 older?

16 A. Older.

17 Q. All right. Do they stay with you or - they're
18 on their - on to their own lives now?

19 A. Uh-huh. Rest them up on their own. But I'm
20 staying with one of my daughters.

21 Q. All right. I'm saying - say that again. The
22 rest of them are what?

23 A. They all grown.

24 Q. Okay.

25 A. Living on their own.

1 Q. Okay.

2 A. And I stay with one of my daughter off and on.

3 Q. What's your daughter's name that you stay with?

4 A. Ashely Gainey.

5 Q. Ashley?

6 A. A-S-H-E-L-Y.

7 Q. And, ma'am, what do you do for a living?

8 A. I work at McDonald's.

9 Q. All right. Is there a particular one you work

10 at or do you have -

11 A. 13th Street.

12 Q. 13th Street? How long you been there?

13 A. I just started.

14 Q. Okay. Where - during the time of this incident

15 were you working?

16 A. Yes.

17 Q. Where were you working at then?

18 A. In Rydal, Georgia.

19 Q. You were in Georgia?

20 A. Yes.

21 Q. You lived in Georgia?

22 A. Yes.

23 Q. Okay. All right. Do you know Andre Abrams?

24 A. No, I don't know him. I'm just know him as my

25 daughter neighbor.

1 Q. Your daughter neighbor?

2 A. Across the road.

3 Q. All right. So you know of him?

4 A. Right.

5 Q. All right. We're going to loop back around to
6 that in a - in a minute. So please don't be offended by
7 this question. I ask everyone this. Have you ever been
8 convicted of a felony?

9 A. Yes.

10 Q. All right. How many times have you been
11 convicted of one?

12 A. One.

13 Q. One? Where's that conviction at?

14 A. Here.

15 Q. Alachua County?

16 A. Uh-huh.

17 Q. When was that?

18 A. Probably about a month ago.

19 Q. A month ago?

20 A. Yeah.

21 Q. All right. What was the nature of this
22 conviction?

23 A. Money laundry.

24 Q. And did you - were you represented by the
25 attorney?

1 A. Yes.

2 Q. Who - who was your lawyer?

3 A. Christopher Jones.

4 Q. Okay. Okay. Can you - what was - was there a
5 sentence in that case that you - what was the sentence in
6 that case?

7 A. Oh, a five years probation.

8 Q. All right. Going to back up to - your daughter
9 is neighbors with Mr. Abrams?

10 A. They - at least they across the road from each
11 other. Like diagonal across the road from each other.

12 Q. All right. So this case, there's an accusation
13 that Mr. Abrams threatened three individuals inside of a
14 vehicle with a flamethrower. So do you know anything
15 about that?

16 A. Yes.

17 Q. All right. Tell me what you know about that.

18 A. It been going on for a little while. It seemed
19 like every time I come to town, there's some little junk
20 going on with him and my daughter, them. Yeah. He always
21 light the - he did it one time when he came out in the
22 yard and was throwing it.

23 Q. Throwing what? I'm sorry.

24 A. That flamethrower. Like shooting it
25 towards -

1 Q. One time - I just want to get - one time you
2 came out in the yard and what -

3 A. No. We was outside when he did it.

4 Q. You - and when you say "we," who -

5 A. Me and my daughter, Ashely Gainey.

6 Q. And do you know what her address is exactly?

7 A. Yes.

8 Q. What is it.

9 A. That's the one I'm staying with. [REDACTED]

10 [REDACTED]

11 Q. [REDACTED]?

12 A. Uh-huh.

13 Q. And do you remember the date in which that
14 occurred?

15 A. No. I don't know the exact date. That - when
16 the first one occurred, no.

17 Q. Yeah. So it's - so it's August now. August
18 2024.

19 A. This happened probably about three years ago.

20 Q. Three years ago? Okay. So this was before this
21 incident?

22 A. Yes.

23 Q. Okay. All right. Well, go ahead. I'm going to
24 let you go ahead and tell your story, and then, I'll
25 follow up.

1 A. The time that I came in town, I think it was
2 like I was there for about a day or two and I was sitting
3 in the house in her front room looking at TV, me and the
4 kids and stuff and I think she was in there cooking. I'm
5 not sure was she cooking or what.

6 Q. And that's your daughter when you say "she?"

7 A. Yeah, my daughter Ashely.

8 Q. Okay.

9 A. So my daughter, my granddaughter. No. We heard
10 commotion at the door and the - one of the churn jumped up
11 and said something, but they couldn't open the door in
12 time. So my baby granddaughter, she come running towards
13 the door talking about that man throwing - knocking on
14 door real hard. Tell me, the man throwing that - shooting
15 that flame sword again. I said what, she talking about
16 something - so when I came out, he was shooting towards
17 the kids. Towards my - my godson girlfriend car. And
18 they all were trying to get out the car. So when I was
19 like, well, why is you shooting that thing at them like
20 that? So he wasn't saying nothing at the time. He was
21 just - started shooting the thing, then went to cursing me
22 out and stuff right there. And I just told them, I said,
23 just call the police on him. Just call the police on him.
24 So I think Ashely ended up calling the police. And that
25 when they came and that what was going on.

1 Q. So let me just - so I can be clear, you came
2 outside because one of the grandchildren -

3 A. Yes.

4 Q. - was banging on the door?

5 A. I [REDACTED] S [REDACTED].

6 Q. Say that again.

7 A. I [REDACTED] S [REDACTED], my granddaughter.

8 Q. All right. How old is she?

9 A. She's 16 now.

10 Q. She's 16?

11 A. Yes, now she is.

12 Q. All right. And she told you that there was
13 something going on outside?

14 A. No. Once one of the grandchild got up because
15 they heard her banging on the door.

16 Q. Uh-huh.

17 A. One of the kids got up to open the door and she
18 was banging on the screen door and she was like that man
19 out there throwing that - shooting that flame sword again
20 and I'm like, what? So when I got up, I tell you, you
21 could see the whole road, like, lighting up. And the
22 kids, the - the other children in the car, they were
23 trying to get up out the car. And M [REDACTED], she was like kind
24 of stuck, like, because she was pregnant at the time.

25 Q. M [REDACTED]

1 A. M [REDACTED] yeah, that's my son girlfriend.

2 Q. So let me get a good idea who was in this car.

3 So let's back up a little bit. Okay. So there were three
4 people in a car, is that right?

5 A. L [REDACTED], M [REDACTED], T [REDACTED], I guess. I'm not sure if
6 M [REDACTED] was in the car, because all of them used to be
7 together. But I'm not sure -

8 Q. All right.

9 A. - if M [REDACTED] was in there.

10 Q. All right. So let's have - this car that you're
11 referring to that people were trying to get out of, can
12 you describe the car?

13 A. Darn, I don't remember what kind of model car it
14 was.

15 Q. Uh-huh.

16 A. I think it was the silver one. Was it a
17 gray -

18 Q. Okay. I mean, if you remember, you remember.
19 If you don't, you don't.

20 A. It's a short car, but I don't remember the name.

21 Q. Uh-huh.

22 A. I don't know was it a Honda. It's an old-model
23 car.

24 Q. Have you seen that car before?

25 A. Yes, I seen it all the time.

1 Q. All right. Do you know whose car it is?

2 A. M█████

3 Q. M█████? And that's your -

4 A. It's her - I don't know if it's her daddy car,
5 but she was driving it at the time.

6 Q. All right. And - and M█████ is your
7 son's -

8 A. Baby mama.

9 Q. Baby mama? All right. And you're saying she
10 was stuck at the time? Can you help me? Like that?

11 A. Yeah. They couldn't get out the car because
12 they - everybody was trying to hurry up and get out the
13 car while he was shooting the thing at the car.

14 Q. All right.

15 A. And they was like all trying to hurry up and get
16 out the car. And I think - I'm not sure did one side of
17 the door latch didn't open up. I don't know was it broken
18 on the inside or on the outside, where you
19 can't -

20 Q. Uh-huh. So how far away - and you say it was,
21 Mr. Abrams. So you heard that. I think you saying
22 your - your granddaughter said something like the man.
23 That man out there shooting or throwing -

24 A. Yeah. Shooting the flamethrower. They call it
25 "throwing."

1 Q. Right, I get it. I get it. Thank you. Right
2 now - and so when you went out there, you actually - did
3 you actually see him?

4 A. Yes. I seen him.

5 Q. So you saw the -

6 A. The car was like - the fire, you can see the
7 fire and everything just coming out and everything.

8 Q. Okay. So tell me how far away was this
9 gentleman who was throwing the flamethrower from the car
10 that you're -

11 A. I said - see, like this - the house - and he
12 crossed the road, and then, this the -

13 Q. All right. Well, let me -

14 A. - the ditch. And they park the cars right there
15 on the side of the - the ditch all the time.

16 Q. All right.

17 A. And he was like -

18 Q. So let me get you to do this - let me get you to
19 do this. So I'm going to give you this piece of paper,
20 and - and I want you to do it in -and artistic, that don't
21 count. It don't - it don't matter.

22 A. I don't have to worry about that?

23 Q. If you can just - and if - I'm going to ask you
24 this question. If you could draw me a picture showing
25 where you were, the car was, and where you say this

1 gentleman was that was throwing a flamethrower was. And
2 it will be helpful - and you can put the road and all
3 that.

4 A. Yeah.

5 Q. It will be helpful if when you're drawing this
6 picture, you - you label it by either putting your name,
7 saying this is where I was. This is where the man with
8 the flamethrower was. Just mark it some kind - so we'll
9 know what you're talking about. You follow what I'm
10 saying?

11 A. Uh-huh.

12 Q. Okay. Oh, I got plenty of paper, so -

13 A. Let me see. It's a way up to the driveway.
14 This driveway from the house. Her driveway would be right
15 there. Oh, it's a ditch - a ditch right there. The ditch
16 right there and the car parked.

17 Q. And who is that?

18 A. Him.

19 Q. All right. Go ahead. You can put - however you
20 want to mark it. Mark it as you - do you - do you know
21 who Mr. Abrams is?

22 A. Uh-huh.

23 Q. Would you recognize him?

24 A. Uh-huh.

25 Q. Are you saying that was Mr. Abrams?

1 A. Uh-huh.

2 Q. All right. Go ahead and put your name.

3 MR. MCCAIN: For the record, could you answer -

4 A. I put "Ashely."

5 MR. MCCAIN: - yes or no?

6 THE WITNESS: Oh, yes.

7 Q. Okay.

8 A. Okay. And the kids - and put the kids in the
9 car.

10 Q. Okay.

11 A. And the - yeah. He was just shooting the
12 flamethrower right there and we was like right here to the
13 door.

14 Q. And is that you?

15 A. It's - I put "me and Ash."

16 Q. Well, actually, you can put your - your name.

17 Well -

18 A. Put Venus?

19 Q. Yeah. All right.

20 A. Pretty much like it was.

21 Q. So what is - do you have a square one? Okay.

22 And there's another square here. What is that?

23 A. That's his house.

24 Q. Okay. All right. So from looking - looking at
25 this - all right. So is it correct to say that you were

1 positioned in a - where, on the side of the road that's
2 behind and where the car is between you and Mr. Abrams?

3 A. This would be the front of her house.

4 Q. Okay.

5 A. And this the front of his house.

6 Q. All right.

7 A. Because they like right across the -

8 Q. But on this night, so the car was between you
9 and Mr. Abrams?

10 A. Yeah.

11 Q. Okay.

12 A. Because this is the road. Right here's the
13 road. And then you got a ditch. And they already parked
14 their car on the side - you know, how the side of the
15 ditch is by the road?

16 Q. All right. And can you - can you give me an
17 estimation about how far were you when you have Mr. Abrams
18 here -

19 A. Uh-huh.

20 Q. - and the ex in the vehicle. Can you give me an
21 estimation in your mind about how far apart was that? Was
22 it five feet, 10 feet, 15 feet? Whatever - whatever
23 you - your recollection is.

24 A. I'll say about - I want to count 20 feet. 20,
25 yeah.

1 Q. Okay. When you said "20 feet," what are you
2 referring to? Was that the distance?

3 A. It was like. It's - it was like kind of close
4 up.

5 Q. Okay.

6 A. From - I'll say he'll probably standing from
7 right there and the car was like right there. But how the
8 road made -

9 Q. Okay.

10 A. The road -

11 Q. So just - just to be clear, and - and that's
12 fine. So you're pointing to - what would - you were
13 pointing inside of this room, which is the deposition room
14 here.

15 A. Okay. I'll say -

16 Q. And you're -

17 A. - because the road is shaped like - it was more
18 like this. And then the cars parked right there on the
19 side, like it's a ditch, and then, the side of the street
20 with the road at -

21 Q. Uh-huh.

22 A. But it's a piece of land, like right there
23 between it. But all the cars already parked there.

24 Q. Right.

25 A. And then him - he'll probably about to that

1 wall, to where this car is at - the car right here to that
2 wall right there from out his driveway.

3 Q. All right. So this room is, I think roughly -

4 MR. MCCAIN: 12 to 15 feet.

5 MR. MARTIN: 12 to 15 feet? Yeah.

6 Q. Is that - is that fair?

7 A. Uh-huh.

8 Q. All right. All right. So do you - I understand
9 you - you said you had asked Mr. Abrams a question.

10 A. Yeah. I asked him why he was shooting that
11 flame thing over at that car like that.

12 Q. Did the - now, when you're talking to him, what
13 were the - the girls doing when you were talking to him?

14 A. Trying to get out the car.

15 Q. They were actually in the midst of -

16 A. They all trying to get out the car.

17 Q. All right. So when you were talking to him, was
18 he shooting - throwing the flamethrower or shooting the
19 flamethrower or was he had stopped?

20 A. He had stopped after a minute or so.

21 Q. Okay. Did he ever say anything to the girls as
22 they were getting out?

23 A. No. I don't remember.

24 Q. And I just want to be clear, when the girls was
25 getting out, was the flame shooting or was it only while

1 they were inside the car?

2 A. Only while they was inside the car.

3 Q. So once they stepped out, he stopped?

4 A. Yeah.

5 Q. Okay. Did the girls - from what you could - did
6 they ever say anything to Mr. Abrams?

7 A. I'm not sure. I can't even say, because it was
8 just a while - but I definitely know I was.

9 Q. Yes, ma'am. All right. So after the - the
10 girls had gotten out the car and Mr. Abrams had stopped
11 throwing the flamethrower, what did he do then?

12 A. Arguing.

13 Q. With - with who, you?

14 A. Everybody.

15 Q. Do you know - recall what he was arguing about?

16 A. No. I can't recall what he was arguing about.

17 Q. All right. So how long had you lived with your
18 daughter at this point?

19 A. At that point, I really wasn't staying with her.
20 I was staying in Georgia. I come down -

21 Q. You was staying in Georgia? Okay.

22 A. - for the weekend. Well, first I was living in
23 Ocala, then I moved from Ocala and I think I stayed with
24 her about two weeks before I moved to Georgia. And then I
25 will come back like every other weekend, something like

1 that.

2 Q. All right. Before I forget about this, if I
3 could get you to sign this and date it.

4 MR. MCCAIN: It is August 2nd.

5 Q. All right. Thank you, ma'am.

6 A. Uh-huh.

7 Q. So you have - you said you would visit
8 your - your daughter from time to time?

9 A. Uh-huh.

10 Q. All right. Are you aware of any difficulties
11 between, I guess, your daughter or other neighbors between
12 Mr. Abrams?

13 A. Mr. Abrams, yeah. I've witnessed lots of stuff
14 with him and her.

15 Q. All right. Can you tell me what?

16 A. One time they was friends and I guess she said
17 he tried to talk to her and when she turned him down,
18 everything just went south. Like he was arguing about
19 cars parking across the road on her side of the property.

20 Q. Uh-huh.

21 A. And it was just - (indiscernible) with that
22 right there.

23 Q. Okay. So what this issue was - so the issue,
24 was it with her?

25 A. Uh-huh.

1 Q. And so who else lives in the house with her?

2 A. Her kids.

3 Q. All right. How many kids does she have?

4 A. Seven.

5 Q. Seven? Are these older kids? Younger kids?

6 A. They're young.

7 Q. Young kids?

8 A. All them under, I think Knowledge probably just
9 turned 14.

10 Q. Anybody else that he had - he seemed to have
11 problems with?

12 A. No. Well, sometimes people in the neighborhood.
13 Well, I ain't got nothing to do with all that. But -

14 Q. And when you say - I want to kind of go back to
15 something when you said you were money laundering and
16 Christopher Jones was your attorney.

17 A. Uh-huh.

18 Q. All right. And that was here and I - and I
19 neglected as you were talking about here in Alachua
20 County? Is that what you meant by "here?"

21 A. Yeah.

22 Q. All right.

23 A. I guess.

24 Q. Was it in - in state court or was it feds? The
25 federal court?

1 A. Yeah.

2 Q. Okay. And - and do you remember who the judge
3 was?

4 A. No.

5 Q. Huh?

6 A. No.

7 Q. You don't know? Okay.

8 MR. MCCAIN: I ordered it on NCIC. I'll let you
9 know.

10 Q. All right. So - and I'm sorry. I'm jumping
11 around a little bit here. So when he said he was arguing,
12 did - and the girls got out the car and he was arguing
13 with you?

14 A. Yeah. Me and him and my daughter Ashely.

15 Q. All right. And then how did that
16 argument - then all of a sudden you all just stopped
17 arguing and when - or did something happen?

18 A. I don't know. Did it continue to the police got
19 there or what? I don't know.


20 Q. Okay. So continue. The police, the arrival
21 stopped it, is that what you're saying or no?

22 A. No, I don't think - I'm not sure. I don't know.
23 Did the police come in and stopped it, or either it
24 just - I don't know, because I usually just tell them to
25 go on in house and just wait till the police come. Don't

1 even sit there and argue with him.

2 Q. Okay.

3 A. But I did, because at the time, I was mad. And
4 that was my grandkids in that car. They could have caught
5 that car on fire, and they could have - something could
6 have happened to them, serious - got burned up in that
7 car.

8 Q. Did you talk to your - your grandkids and M 
9 about what had happened?

10 A. Did I talk to them about what had happened?

11 Q. Yeah? Did - the days - did -

12 A. Oh, no. They're just - because every time they
13 pull up, they'll just sit in the car for a while, probably
14 hours, something like that, just talking amongst each
15 other.

16 Q. Okay.

17 A. And they were like, all they noticed that - they
18 said they thought they were seeing stuff at first. And
19 they said all they know, they seen the fire coming at the
20 car.

21 Q. Okay.

22 A. So -

23 Q. Okay. That's what I meant. They -

24 A. And they said they could feel the fire, it was
25 coming through the car.

1 Q. They said they actually felt -

2 A. Uh-huh. The heat. Uh-huh.

3 Q. Okay. All right, ma'am, anything else you want
4 to tell me about what you know about this case?

5 A. No. That's probably it.

6 Q. All right. I just want to make sure. So to
7 make sure I got it, so it's 352-██████████ Is that right?

8 A. Yes.

9 Q. All right.

10 MR. MARTIN: All right, ma'am. I appreciate
11 your time. I don't have any other questions.

12 THE WITNESS: Okay.

13 MR. MARTIN: The state may.

14 MR. MCCAIN: I had a few questions.

15 CROSS-EXAMINATION.

16 BY MR. MCCAIN:

17 Q. So I ██████████ S ██████████ is your granddaughter?

18 A. Yes.

19 Q. Is that Ashely's daughter?

20 A. No.

21 Q. Okay. Is - but was she living in that house?

22 A. Yeah, she be with me. I raised her and T ██████████.

23 Q. Oh, okay. I got you. So are they still living
24 in that house?

25 A. No.

1 Q. Okay.

2 A. M [REDACTED] is.

3 Q. Okay. Where does I [REDACTED] live?

4 A. With her mother.

5 Q. And where's that?

6 A. I don't know the address, but it's [REDACTED]. I

7 don't know if it's [REDACTED] [REDACTED] or [REDACTED] [REDACTED].

8 Q. Okay. What's - what's her mother's name?

9 A. Shanae Gainey.

10 Q. How do I spell that first name?

11 A. S-H-A-N-A-E.

12 Q. Okay. And when you said that you told someone
13 to tell the police - to call the police, who was it that
14 you told to call the police?

15 A. Anyone. The kids. I don't know. I was just
16 directed toward them.

17 Q. Okay. I got you.

18 A. I said you all need to call the police.

19 Q. All right.

20 MR. MCCAIN: I don't have - I don't have
21 anything else. Did you have anything?

22 MR. MARTIN: No. So you have the right to
23 review this deposition if it's reduced to a transcript.
24 You won't be able to change what's actually typed up,
25 however, there's a document called an "errata sheet" in

1 which you can make note of any errors or admissions that
2 you see. For example, I said the transcript said, you
3 said that, but you said cat. Or all this was left out.
4 Or I should have said all this, and that could be put as
5 part of the deposition attached to it. So you can read
6 it, or you can like - or you can waive it. You can waive
7 it. You know, like I said - I'm going to trust that
8 between the skill of the court reporter and the recording,
9 everything was said accurately and I meant what I said -

10 THE WITNESS: Yeah.

11 MR. MARTIN: - when I said it. Or you can read
12 it. Either one is perfectly fine. It's just up to you.
13 And they - and they going to need to know, so they can
14 prepare one way or the other. Which one you want to do?

15 A. Yeah, I don't have no - I was speaking the
16 truth, so -

17 MR. MARTIN: So that's a waive?

18 THE WITNESS: Uh-huh.

19 MR. MARTIN: All right. All right. Thank you,
20 ma'am.

21 THE WITNESS: You're welcome.

22 MR. MCCAIN: Thank you.

23 THE WITNESS: All right. You all have a great
24 day.

25 MR. MARTIN: All right.

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(The deposition was concluded.)

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CERTIFICATE

STATE OF FLORIDA)
COUNTY OF ALACHUA)

I, Jodi Moore, do hereby certify that the deposition of Venus Grant, 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 29TH DAY OF JANUARY 2025.

Jodi Moore

Jodi Moore
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