

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA IN AND FOR PASCO COUNTY
2014CF000216CFAXES-1

STATE OF FLORIDA

V.

CURTIS JUDSON REEVES

2020 SEP -3 PM 1:45
CLERK OF COURT
JUDICIAL CIRCUIT
SIXTH JUDICIAL CIRCUIT
PASCO COUNTY, FLORIDA

**STATE'S MOTION IN LIMINE TO
EXCLUDE THE TESTIMONY OF DEFENDANT REGARDING
HIS CHARACTER AND TO REQUIRE A PROFFER OF DEFENDANT'S
CHARACTER EVIDENCE OUTSIDE THE PRESENCE OF THE JURY**

COMES NOW, Bernie McCabe, State Attorney, for the Sixth Judicial Circuit in and for Pasco County, Florida, by and through the undersigned Assistant State Attorney hereby respectfully requests this Honorable Court to enter an order excluding the testimony of the Defendant regarding his character and to require the defense to proffer any evidence of the Defendant's character outside the presence of the jury and as good cause would show:

State's Position

1. The previous testimony of the Defendant regarding his character is inadmissible under section 90.404(1) (a) and should be excluded under section 90.405(1).
2. The Defendant is only allowed to proffer his good character or traits of his character where such evidence has reference to a trait involved in the offense charged.
3. The only method of proving admissible character or traits of character is by testimony about his reputation.

Factual Basis

The Defendant is charged with 2° Murder. After an immunity hearing, Judge Barthle denied the Defendant's immunity request. The State anticipates the Defendant will continue to maintain he acted in self-defense and that killing of Chad Oulson was justifiable.

The Defendant testified during his immunity hearing about numerous awards and certificates he received though out his life, including documents acquired while employed at Tampa Police Department (Defense Composite Exhibit #42) and Bush Gardens (Defense Composite Exhibit #43). See, Exhibit #1, attached. (Immunity hearing transcript, Volume 14, pages 1790 - 1832. and Volume 15, pages 1822 - 1831)

The below-identified summary of testimony is general character trait evidence of the Defendant that is either a pertinent or non-pertinent trait of second degree murder and was presented in the form of specific incidences of conduct. (All page numbers are from Exhibit #1, attached.)

Defense Composite Exhibit #42 (Pgs. 1792 - 1818)

1. U.S. Naval Submarine School Certificate (Pg. 1792, Ln. 3-4)
2. Navy Training Course certificate (Pg. 1792, Ln. 16)
3. Certificate - 328 hours of training in the police academy (Pg. 1793, Ln. 1-2)
4. Tampa Police department Certificate of Outstanding Achievement for Recruit in the Class of ____ (Pg. 1793, Ln. 3-5)
5. The Florida Institute for Law Enforcement Certificate of Completion (Pg. 1793, Ln. 12-13)
6. The Florida Institute for Law Enforcement at St. Pete JC, Interviewing and Interrogation (Pg. 1793, Ln. 20-22)
7. Hillsborough Community College Associate of Arts Degree in Pre-Police Science and Administration (Pg. 1794, Ln. 4-5)
8. State of Florida Police Standards Council Career Development For Intermediate Training (Pg. 1794, Ln. 22-24)
9. State of Florida, the Commission on Police Officer Standards and Training (Instructor Course) (Pg. 1795, Ln. 19-21)
10. The National Honor Society (University of Tampa) (Pg. 1796, Ln. 7-9)
11. University of Tampa, Bachelors of Science (Pg. 1796, Ln. 10-11)
12. Department of the Army, Certificate of Training, Tampa Police Department (Pg. 1796, Ln. 15-16)
13. State of Florida Police Standards Certificate of Recognition (Pg. 1797, Ln. 2-3)
14. US Army Sniper/Counter-Sniper Course (Pg. 1797, Ln. 11-12)
15. NRA certified Shotgun Instructor (Pg. 1797, Ln. 19-20)

16. NRA Certified Rifle Marksman Instructor (Pg. 1798, Ln. 2-3)
17. NRA Certified Pistol and Marksmanship Instructor (Pg. 1798, Ln. 7-8)
18. Law Enforcement Officers Training School Certificate of Attendance - Hostage Negotiator (Pg. 1798, Ln. 14-16)
19. FBI Training School Certificate of Attendance, Special Tactical Firearms School, 1977 (Pg. 1798, Ln. 25 through Pg. 1799, Ln. 1-2)
20. NRA Police Firearms Instructor, 1978 (Pg. 1799, Ln. 9-10)
21. Hillsborough Community College, Completed a Criminal Justice Course, 1979 (Pg. 1799, Ln. 18-20)
22. Law Enforcement Institute - Survival Tactics, 1979 (Pg. 1800, Ln. 11-14)
23. NRA Certificate of Completion - Sharpshooter School, 1980 (Pg. 1800, Ln. 22-24)
24. NRA Certificate of Completion Police Firearms Instructor School, 1980 (Pg. 1801, Ln. 10-13)
25. NRA Home Firearm Responsibility Instructor (Pg. 1801, Ln. 23-24)
26. Law enforcement Institute - Civil Laws and Liabilities, 1980 (Pg. 1802, Ln. 7-8)
27. State of Florida, the Commission on Police Officers Standards and Training, Specialized Training certificate for Instructor's Techniques (Pg. 1802, Ln. 14-17)
28. Tampa Police Academy Advance Training Certificate, Instructor Techniques, 1979 (Pg. 1803, Ln. 7-9)
29. Public Safety Educators - Survival Techniques (Pg. 1803, Ln. 20-23)
30. FBI Training School - Effective Communication (Pg. 1804, Ln. 10-11)
31. International Association of Chief of Police - Shooting Classroom and Range Instruction (Pg. 1804, Ln. 16-19)
32. Law Enforcement Officers Training School Certificate of Attendance - Anti-sniper and Survival Tactical School, 1982 (Pg. 1805, Ln. 4-6)
33. Fire Services Association - Vertical Rope Rescue School (Pg. 1805, Ln. 14-15)
34. Central Florida Criminal Justice Regional Training Center Certificate of Completion - Disturbance and Control (Pg. 1806, Ln. 2-5)
35. NRA Certificate of Appointment - Safety and Functional Requirements Firearms Training (Pg. 1806, Ln. 18-25 through Pg. 1807, Ln. 1)
36. FBI Academy - Management Seminar (Pg. 1807, Ln. 10-16)

37. State of Florida Department of Law Enforcement - Executive and Organizational Changes, 1983 (Pg. 1807, Ln. 20-22)
38. Florida Department of Law Enforcement Organized Crime Institute - National Conference for Violence (Pg. 1808, Ln. 7-11)
39. Models For Management (Pg. 1808, Ln. 19)
40. Commissions On Criminal Justice Training (Pg. 1809, Ln. 2-5)
41. Department of the Army - Advanced Marksmanship and Counter Sniper and Preparatory Course (Pg. 1809, Ln. 11-13)
42. Florida Department of Law Enforcement Organized Crime Institute Ethnic Crime Seminar (Pg. 1810, Ln. 5-6)
43. Florida Institute for Law Enforcement, Psychology of Management (Pg. 1810, Ln. 11-13)
44. Florida Institute for Law Enforcement, Philosophy of Management (Pg. 1810, Ln. 24-25)
45. Criminal Justice Standards and Training Commission, Advance Criminal Investigation (Pg. 1811, Ln. 8-11)
46. FBI Executive Development Seminar, 1987 (Pg. 1811, Ln. 17-18)
47. Certificate of Appreciation, City of Tampa, 20 years of service (Pg. 1812, Ln. 2-4)
48. Department of Criminal Justice Standards and Training Instructor Certification, 1988 (Pg. 1812, Ln. 6-8)
49. Certificate Police Community Relations and Leadership (Pg. 1813, Ln. 10-11)
50. Certificate Police Community Relations and Leadership (Pg. 1813, Ln. 18-19)
51. Leadership Certificates (Pg. 1814, Ln. 8-22)
52. Delray Beach Police Department Street Survival Tactical Edge Seminar, 1989 (Pg. 1814, Ln. 23-24)
53. Street Survival, 1989 (Pg. 1815, Ln. 15-17)
54. International Association of Chiefs of Police, SWAT Supervisors Tactics and Management, 1989 (Pg. 1815, Ln. 24-25)
55. Certificate of Appreciation, 25 Years of Service. (Pg. 1816, Ln. 13-14)
56. Department of Law Enforcement, Mutual Aid with SWAT Teams (Pg. 1816, Ln. 16-18)
57. Recognition of 15 Years of Tenacity, Guile and Devotion, Tactical Response Team
58. Certificate - Diversity, 1991 (Pg. 1817, Ln. 9-10)
59. Demonstrations In The 1990s, A Law Enforcement Response, 1991 (Pg. 1817, Ln. 15-16)
60. Certificate of Appreciation (Pg. 1817, Ln. 23-24)

61. Fraternal Order of Police, Retirement Certificate, 1993 (Pg. 1818, Ln. 7-9)
62. Plaque -27 Years of Dedicated Service Between 1966 and 1993 from City of Tampa (Pg. 1818, Ln. 13-15)

Defense Composite Exhibit #43 (Pgs. 1822 - 1831)

63. Certified Protection Professional Letter, 1995 (Pg. 1822, Ln. 12-14)
64. Busch Entertainment Corporation Certificate (Management Class) (Pg. 1823, Ln. 8-12)
65. American Society for Amusement Park Security and Safety, 1994 (Membership Certificate) (Pg. 1823, Ln. 16-17)
66. American Society for Industrial Security Membership Certificate (Pg. 1823, Ln. 24-25)
67. The Busch Entertainment Corporation Certificate - Communication Skills, 1995 (Pg. 1824, Ln. 8-10)
68. Certified Protection Professional, 1995 (Pg. 1824, Ln. 23-24)
69. Busch Corporation, Situational Leadership Certificate (Pg. 1825, Ln. 9-10)
70. Course - Fundamental Concepts of Security Techniques (Pg. 1825, Ln. 17-18)
71. American Society of Industrial Security (Pg. 1826, Ln. 11-13)
72. Recertification - Protection Professional (Pg. 1826, Ln. 20-21)
73. Recertification - Protection Professional (Pg. 1826, Ln. 22-23)
74. American Society for Industrial Security - Security Challenges for the New Millennium (Pg. 1827, Ln. 7-9)
75. Tampa Chapter of American Society for Industrial Security, 1999 (Pg. 1827, Ln. 21-22)
76. Charles Knight Award, 2000 (Pg. 1828, Ln. 7-10)
77. United Way Program Curtis Reeves 2000 Day of Caring (Pg. 1828, Ln. 19-23)
78. Tampa Area Safety Council, Violence in the Workplace, 1994 (Pg. 1829, Ln. 2-4)
79. Certificate of Merit for Handling People with Diplomacy and Tact, 2001 (Pg. 1829, Ln. 14-16)
80. Security in the New Millennium (Pg. 1829, Ln. 25)
81. Visitor Safety and Security Summit, 2002 (Pg. 1830, Ln. 13-15)
82. ASIS Florida West Coast Chapter of Domestic Violence, Stalking in the Workplace (Pg. 1830, Ln. 18-19)

83. American Society for Amusement Parks, Certificate of Membership, 2004 (Pg. 1831, Ln. 4-7)
84. ASIS Homeland Security Conference (Speaker at conference (Pg. 1831, Ln. 11-14)

Argument

General

An accused in a criminal case is permitted to offer evidence of pertinent or relevant personal character trait(s) that relates to a pertinent trait of the charged crime.

"The general rule in Florida is that a criminal defendant is allowed to introduce evidence of his good character and reputation where such evidence has reference to a trait involved in the offense with which he is charged. Campos v. State, 366 So.2d 782, 784 (Fla. 3d DCA 1978); Seabrook v. State, 348 So.2d 663, 664 (Fla. 2d DCA 1977). A defendant's lack of propensity toward violence is clearly relevant to the trait of violence inherent in a charge of attempted murder. Campos, 366 So.2d at 784; Seabrook, 348 So.2d at 664. Moreover, section 90.404(1) (a), Florida Statutes (2002), specifically allows the accused to offer evidence of a pertinent trait of his character. Pino v. Koelber, 389 So.2d 1191, 1193 (Fla. 2d DCA 1980)." Hoffman v. State, 953 So.2d 643, 645 (Fla. 3rd DCA 2007)

The admissibility of the Defendant's character traits is governed by Rule 90.404(1) (a).

Rule 90.404 states in part:

§90.404 Character evidence; when admissible

(1)Character evidence generally - Evidence of a person's character or a trait of character is inadmissible to prove action in conformity with it on a particular occasion, except:

(a) *Character of accused.* - Evidence of a pertinent train of character offered by an accused, or by the prosecution to rebut the trait.

Pertinent traits of the crime charged

The character traits involved in the offense of 2° Murder are non-violence and peacefulness. Id. at 645-46.

"An accused is entitled to introduce evidence of his good character and reputation in the community, where that evidence refers to traits involved in the offense with which the defendant is charged. Norman v. State, 156 So.2d 186 (Fla. 3d DCA 1963). Garcia's testimony would have been that appellant enjoyed the reputation in the community for non-violence. One's lack of propensity toward violence is certainly relevant to the trail of violence inherent in a second degree murder charge. Norman v. State, supra, and see Seabrook v. State, 348 So.2d 663 (Fla. 2d DCA 1977)." Campus v. State, 366 So.2d at 784.

Method of proving character

Evidence of general character is not admissible; it must relate to a particular pertinent trait of the charged crime. Hoffman, 953 So.2d at 644.

If the character trait is not relevant to a pertinent trait involved in the crime charged is not admissible under section 90.404(1) (a). Russ v. State, 934 So.2d 527, 531-32 (Fla. 3rd DCA 2006) (Trial court did not abuse its discretion in prosecution for lewd and lascivious exhibition on a child and sexual battery on person less than twelve years of age by refusing to permit defendant to call character witnesses to testify as to his reputation in the community for non-violence and respect toward females; no argument was made defendant had acted violently and the defendant's reputation for respectfulness toward women had no bearing on whether he committed the offenses.)

"Because the victim's character was not an essential element of the crime or defense at bar, proof of same was required to be made by reputation evidence. See *Ehrhardt* at § 405.3. Reputation evidence is evidence of a person's character within the community. Such evidence does not include specific acts or opinion testimony. *Id.* at § 405.1. In the case at bar, the proffered testimony of the two witnesses divulges appellant's attempt to introduce specific act testimony—not reputation evidence. Therefore, such evidence was inadmissible under section 90.405. See, e.g., *Taylor v. State*, 513 So.2d 1371, 1372 (Fla. 2d DCA 1987); see also *Perrin v. Anderson*, 784 F.2d 1040 (10th Cir.1986)." *Dupree v. State*, 615 So.2d 713, 722 (Fla. 1st DCA 1993)

The accused may not offer character trait evidence in the form of opinion evidence. *Rigterink v. State*, 66 So.3d 866, 895 (Fla. 2011) (Additionally, Farmer presented his testimony with regard to Mullins' allegedly violent nature in terms of his *own opinion and generalized personal experiences*, which is not a proper method to establish character or reputation evidence in Florida. See, e.g., *Wyatt v. State*, 578 So.2d 811, 813 (Fla. 3d DCA 1991) (holding that section 90.405, Florida Statutes, "specifically limits the introduction of character evidence to reputation ... [and] does not permit evidence of character to be made by opinion" (citations omitted)). *Wyatt v. State*, 578 So.2d 811, 813 (Fla. 3rd 1991) (Additionally, section 90.405, Florida Statutes (1987), specifically limits the introduction of character evidence to reputation or specific instances of conduct: *Wrobel v. State*, 410 So.2d 950 (Fla. 5th DCA), *rev. denied*, 419 So.2d 1201 (Fla.1982). This statute does not permit evidence of character to be made by opinion. See *Alvarado v. State*, 521 So.2d 180 (Fla. 3d DCA 1988))

Specific incidences of behavior are not admissible to prove a character trait under Rule 90.404(1) (a). *Buford v. State*, 403 So.2d 943, 949 (Fla. 1981) (Defendant in murder case could prove his nonviolence by evidence of his general reputation in the community; not by specific instances of nonviolence.) *Love v. State*, 971 So.2d 280, 285-86 (Fla. 4th DCA 2008) (Even where character evidence is proper, admissible evidence is "limited to the testimony witnesses who are aware of the victim's *288 reputation for the pertinent character trait." *Ehrhardt*, § 404.6

(Emphasis added); § 90.405, Fla. Stat. (2006); see *Dupree*, 615 So.2d at 721. A litigant may not prove a character trait by offering evidence about instances of conduct that demonstrate the trait.)

The accused may only offer character trait evidence in the form of "reputation" testimony. Rule 90.405(1) Wrobel v. State, 410 So.2d 950, 950-1 (Fla. 5th DCA 1982) (In Florida, the methods of presenting character evidence is limited to testimony of reputation. Maloy v. State, 52 Fla. 101, 41 So. 791 (1906))

Rule 90.405 states in part:

§90.405 Methods of proving character

(1)Reputation - When evidence of the character of a person or of a trait of that person's character is admissible, proof may be made by testimony about that person's reputation.

"Under Florida's new evidence code, evidence of a person's character or a trait of his character is inadmissible to prove that he acted in conformity with it on a particular occasion except under certain limited circumstances. § 90.404(1). Fla.Stat. (1981). One exception permits, in a criminal case, the admission of evidence of a pertinent character trait of the accused offered by him, or by the prosecution to rebut the trait. § 90.404(1). Fla.Stat. (1981). However, except when character or a trait of a character is an essential element of the case, proof of a person's character should be made through his testimony about his reputation. §90.405, Fla.Stat. (1981)" Dixon v. State, 426 So.2d 1258, 1259 (Fla. 2nd DCA 1983)

Foundation for the admissibility of reputation evidence

Before reputation evidence regarding a relevant character trait of the accused is admitted, a proper predicate must be established. Rigterink, 66 So.3d at 895-95

The Florida Supreme Court interpreted section 90.405(1), Florida

Statutes, to require the following predicate for the admissibility of reputation testimony:

"Section 90.405 governs the type of evidence that may be used to prove reputation. As a **predicate** to the introduction of such evidence, a foundation must be *895 laid to prove that the witness testifying as to reputation is aware of the person's general reputation for truthfulness in the community. Charles W. Ehrhardt, *Florida Evidence* § 405.1 (1995 ed). Essentially, it must be established that the community from which the reputation testimony is drawn is sufficiently broad to provide the witness with adequate knowledge to give a reliable assessment. This assessment must be based on more than "mere personal opinion, fleeting encounters, or rumor." *Rogers v. State*, 511 So.2d 526, 530 (Fla.1987), *cert. denied*, 484 U.S. 1020, 108 S.Ct. 733, 98 L.Ed.2d 681 (1988). Further, reputation evidence "must be based on discussions among a broad group of people so that it accurately reflects the person's character, rather than the biased opinions or comments of ... a narrow segment of the community." *Ehrhardt, supra*, § 405.1 at 197 (footnote omitted). *Larzelere v. State*, 676 So.2d 394, 399-400 (Fla.1996)."
Rigterink, 66 So.3d at 894-95

Admissibility of hearsay to establish reputation

Assuming relevancy and satisfaction of the predicate requirements, hearsay testimony is admissible to establish one's reputation within his or her community. Section 90.803(21), Florida Statutes (2005).

Conclusion

The above-identified testimony and composite exhibits is not admissible and should be excluded under section 90.405(1), Florida Evidence Code.

WHEREFORE, the State of Florida respectfully requests the Court to enter its Order excluding the testimony of the defendant as it relates to his character and to instruct the attorney for the Defendant, and any witnesses, not to mention or refer, or interrogate concerning, or attempt to convey to the jury in any manner either direct or indirect, any of the above mentioned facts without first obtaining permission of the Court outside the presence and hearing of the jury.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing State's Motion in Limine to Exclude the Testimony of the Defendant Regarding His Character and to Require a Proffer of Defendant's Character Evidence outside the Presence of the Jury was furnished to Richard Escobar, Esq., Attorney for the Defendant, at 2917 West Kennedy Blvd., Suite 100, Tampa, FL 33609-3163, by U.S. Mail or Personal Service this 3rd day of September, 2020.

BERNIE McCABE, State Attorney
Sixth Judicial Circuit of Florida

By:

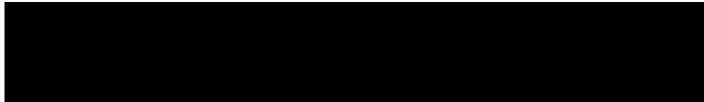

Glenn L. Martin, Jr.
Assistant State Attorney
Bar No. 435988
P.O. Box 5028
Clearwater, FL 33758
(727) 464-6221

Exhibit #1

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT OF
THE STATE FLORIDA, IN AND FOR PASCO COUNTY
CASE NO: CRC14-0216CFAES

STATE OF FLORIDA,

Plaintiff,

vs.

VOLUME XIV

CURTIS J. REEVES,

Defendant.

PROCEEDINGS: Stand Your Ground Motion

DATE: February 28, 2017

BEFORE: The Honorable Susan Barthle
Circuit Court Judge

PLACE: Robert D. Sumner Judicial Center
38053 Live Oak Avenue
Dade City, Florida 33523

REPORTED BY: Charlene M. Eannel, RPR
Court Reporter
PAGES 1635 - 1818

VERBATIM PROFESSIONAL REPORTERS, INC.
601 Cleveland Street, Suite 380
Clearwater, Florida 33765
(727) 442-7288

1 A. Yes, sir. These are the schools that I attended
2 and the certificates that I acquired, the certifications
3 that I had while I was working at Busch Gardens.

4 MR. ESCOBAR: Your Honor, we would move both
5 Defense Exhibit Number 206, as well as Defense
6 Exhibit 205 into evidence, I believe without
7 objection.

8 MR. MARTIN: It's part of our stipulation, isn't
9 it?

10 MR. ESCOBAR: Yeah, it is.

11 MR. MARTIN: Yes.

12 THE COURT: Okay. They will be admitted.
13 What's the number?

14 THE CLERK: 32 and 43.

15 MS. SUMNER: What was the number, Mr. Escobar?

16 MR. MARTIN: 42 and 43. I'll tell you as soon
17 as I see it.

18 MR. ESCOBAR: 42 is the certificates for law
19 enforcement. 43 is Busch Gardens.

20 Mr. Shah, would you hold one up?

21 No, that's not connected? So that's right.

22 That's right.

23 BY MR. ESCOBAR:

24 Q. Mr. Reeves, I'd like you to turn, if you can,
25 just slightly, keeping -- please keep in mind that the mic

1 is going to be here, so I'm going to scoot it just a
2 little bit so that we don't lose your voice in the
3 process, and I'm going to show you the U.S. Naval
4 Submarine School Certificate.

5 What is that?

6 A. That's the certificate that I got when I
7 graduated from submarine school right after high school.

8 Q. Okay. Could you please mark that for the
9 record. The qualified in submarine certificate?

10 A. Well, after you're assigned to the submarine,
11 you have a window of opportunity there that you must
12 qualify yourself in submarines, that you need to find out,
13 research, study, and take a test on all the operational
14 systems on a submarine. That's a certificate that I got
15 when I qualified.

16 Q. Okay. Navy training course certificate?

17 A. Those are -- those are the training courses that
18 you need to take for -- for advancement in the military.
19 That's a notification of the testing and the classes.

20 Q. Another?

21 A. Yes, sir. That's another training certificate.
22 Some of those are optional and some are mandatory, if you
23 want to be promoted. So every opportunity that I got, I
24 signed up for whatever they had to offer.

25 Q. Okay. What is this?

1 A. That's the certificate that I received from the
2 police academy with 328 hours of training in the academy.

3 Q. Tampa Police Department Certificate of
4 Outstanding Achievement for Recruit in the Class of -- it
5 looks like Number 14.

6 A. Yes, sir. That was a -- that I alluded to
7 earlier. That was the certificate for being, I guess, the
8 best all around in all of the different areas of
9 evaluation during the academy.

10 I think my son won the same award, but it had a
11 little different name.

12 Q. This one says, "The Florida Institute for Law
13 Enforcement Certificate of Completion."

14 What was this?

15 A. This is a dedicated training program. They used
16 to have a kit that you put together. It was the way that
17 you made a composite when you were not an artist. It had
18 different components to it, so training school would teach
19 you how to make a composite picture of a suspect.

20 Q. This is, likewise, the Florida Institute for Law
21 Enforcement at St. Pete JC, interviewing and
22 interrogation.

23 A. Yes, sir. I think that was -- at the time it
24 was called a reinterview and interrogation technique,
25 which was pretty much the standard around the country.

1 I had been to a preliminary class. This was, I
2 guess, sort of like an addendum or maybe a little bit
3 more advanced class in interviewing and interrogation.

4 Q. Hillsborough Community College Associate of Arts
5 Degree in Pre-Police Science and Administration.

6 A. Yes, sir. That was the degree that I got at
7 Hillsborough Community College.

8 Q. And that was in 1974?

9 A. Yes, sir. Yes, I started in '72 and I graduated
10 in '74.

11 Q. Now, when you were going to college, were you
12 going to college, just to a class here or a class there?

13 A. No, sir. Once -- if you know dealing with the
14 federal government paperwork, once you get into the system
15 you better stay there. So when I started in 1972, I went
16 through -- if the doors were open to the college, I was
17 there. I went three-quarters time year-round until I got
18 my degree in 1976.

19 Q. While you were working full time?

20 A. Working full time, getting called out and trying
21 to raise two kids.

22 Q. State of Florida Police Standards Council Career
23 Development -- Career Develop Certificate for Intermediate
24 Training?

25 A. Yes, sir. They had a program at that time, it

1 was an incentive program, and you could enhance your
2 finances minimally, but you could get some money from the
3 State by taking different classes, so I signed up for
4 everything that was available.

5 Q. I would imagine back in your time as a law
6 enforcement officer with the TPD -- Tampa Police
7 Department you weren't getting paid a whole lot?

8 A. You took every opportunity to make some extra
9 money.

10 Q. Okay.

11 A. And those programs were -- they were around, but
12 they were hard to get into, so you had to put in for them
13 a long time ahead of time. So that is an advanced
14 training certificate.

15 I mean, they give you beginner, intermediate,
16 advanced. They elaborate. They get more sophisticated
17 as you go. It prepares you to do a better job at what
18 you're doing.

19 Q. State of Florida, the Commission on Police
20 Officer Standards and Training. This was an instructor
21 certificate. What is that?

22 A. As I got involved in the detective division with
23 the training -- through the training department and as I
24 got the SWAT team going, you kind of needed some
25 instructor classifications in order to be able to teach

1 some of the classes to some of the folks that were coming
2 in to see if other agencies and that sort of thing. So it
3 was -- that's kind of like a state teaching certificate
4 for law enforcement related class.

5 Q. "This is to certify that Curtis Reeves has been
6 duly elected as a member of --

7 A. That's Alpha Chi. That's the National Honor
8 Society. I got that. I was inducted into that when I
9 graduated from the University of Tampa.

10 Q. University of Tampa degree, Bachelors of
11 Science, magna cum laude?

12 A. Yes, sir.

13 Q. And you graduated magna cum laude in what year?

14 A. 1976.

15 Q. Department of the Army, Certificate of Training,
16 Tampa Police Department. Successfully completed the
17 marksmanship in tactical training on May the 23rd of 1977
18 through May the 26th of 1977.

19 A. Yes, sir. This was some of the special weapons
20 classes that we brought instructors in to help us with.
21 The Army was very kind to me and actually sent me a couple
22 of instructors so we could have a school. Our facility
23 was -- cut down the cost from the government, so that was
24 probably one of the first classes, not necessarily the
25 first class in weaponry, but one of the first classes in

1 long gun utilization.

2 Q. State of Florida Police Standards, again,
3 Certificate of Recognition?

4 A. Yes, sir. Those were classes that were
5 available to you. Some were required and some weren't,
6 and I don't remember if this was or wasn't. But anyway,
7 it was a training. It enhanced your abilities to do the
8 things that you were hired to do. It kept you up to date
9 on laws and that sort of stuff.

10 Q. Okay.

11 United States Army. Completed the
12 Sniper/Counter-Sniper Course, October of 1977?

13 A. Yes, sir. That was in Fort Benning, Georgia.
14 That was a thousand-yard rifle range, and we were --
15 myself and my counterpart, we were trained in the
16 long-range utilization of rifles. So I got thousand-yards
17 shooting. I think that was about two or three weeks long.
18 I don't recollect.

19 Q. The National Rifle Association of America,
20 Certified Shotgun Instructor?

21 A. Yes, sir. That was one of the certificates that
22 I alluded to earlier. There's probably a couple of them
23 in there. You had to have some level of experience and
24 you had to take a test, and they gave you the -- they gave
25 you the certification that allowed you to teach the

1 subjects.

2 Q. National Rifle Association Certified Rifle
3 Marksman Instructor?

4 A. Yes, sir. I met the requirements for the
5 marksmanship instructor by virtue of the military schools
6 and demonstrated skills, I guess you could say.

7 Q. Certified Pistol and Marksmanship Instructor.
8 Is that the same national organization?

9 A. Yes, sir. We -- I tried to get as many people
10 as I could into handgun school. That's where you're going
11 to spend the majority of your time in the SWAT team, so we
12 wanted to be as proficient as we could. So that's the
13 certification that kind of led to that.

14 Q. Law Enforcement Officers Training School,
15 Certificate of Attendance, Sergeant Curtis J. Reeves,
16 Hostage Negotiator?

17 A. Yes, sir. In dealing with hostage situations
18 was the up-and-coming thing. That kind of was the impetus
19 for kind of getting the team off the ground.

20 Q. The SWAT team?

21 A. Yes, sir, the SWAT team off the ground. So this
22 was the school that gave us the background and the
23 information that we needed to understand the dynamics of a
24 hostage situation.

25 Q. Federal Bureau of Investigation Training School,

1 Certificate of Attendance, Special Tactical Firearms
2 School. From 1977, June, to July of 1977?

3 A. Yes, sir. Those are the -- that's kind of what
4 I alluded to. Those are -- to develop your proficiency,
5 they include officer's survival, use of cover and
6 concealment, those -- that type of information which is
7 pretty important to a SWAT team. That's really important
8 to anybody, but particularly the SWAT team.

9 Q. The National Rifle Association of America,
10 again, Police Firearms Instructor, 1978?

11 A. Yes, sir. That's a certification there, you had
12 to meet certain requirements to be able to get that
13 certificate, and at that point, I had the skills and I had
14 the requirements.

15 Q. Okay.

16 A. And you had to be sponsored by your law
17 enforcement agency as well.

18 Q. Hillsborough Community College, completed a
19 criminal justice course. This was -- it looks like in
20 1979, Curtis J. Reeves?

21 A. Yes, sir. That was another class on vicarious
22 liability which is, of course, always an interest to law
23 enforcement agencies, so we tried to keep ourselves
24 abreast of what the legal issues were so that we knew --
25 not only was it applicable to the SWAT team, but also to

1 the regular police work.

2 Q. Now, that vicarious liability appears to have
3 been taught by the Law Enforcement Institute; is that
4 correct?

5 A. I think that was -- yes, sir, it was. And I
6 think there was some name changing going on there. I may
7 be incorrect, but I think that was part of the Florida
8 Department of Law Enforcement. At one point I think it
9 became the Executive Institute, but, in any event, it was
10 a legal group.

11 Q. Another one that appears to have been taught by
12 the Law Enforcement Institute, and that is Officer
13 Survival Tactics.

14 That was done in 1979?

15 A. Yes, sir. Those are the -- again, those are --
16 those are the kind of knowledge that law enforcement
17 officers need. That's the kind of knowledge and
18 information that SWAT teams need, and those are the kind
19 of classes that I was being sent to to develop my
20 expertise in those areas so that I could train other
21 officers that way.

22 Q. The National Rifle Association Certified Curtis
23 Reeves Has Completed The Sharpshooter -- Police
24 Sharpshooter School, 1980?

25 A. Yes, sir. That was a class that was, I think,

1 over in Pinellas County. And again, it was a skills
2 development course.

3 Q. And the National Rifle Association is an outfit
4 out of Washington, D.C.; is that correct?

5 A. Yes, sir, it is. At that time, they were very
6 prevalent in the law enforcement training arena. They
7 were one of the few agencies that really had put together
8 the information that law enforcement agencies needed to --
9 for their skills development.

10 Q. "This is to certify that Curtis Reeves has
11 completed the Police Firearms Instructor School," and this
12 was again by the National Rifle Association of America,
13 and it looks like this is also 1980.

14 It says there that you have scored an 86 percent
15 or more on the 60-round modified 25-yard double action PPC
16 course?

17 A. Yes, sir, it does. That's the -- that's
18 Pinellas Police Academy. Again, that's a skill
19 development class. That -- that really isn't that good of
20 a score. I had a weapons problem. Anyway, it was a
21 skills development course. The weapon that I had had some
22 malfunctions with it, but it's still a passing score.

23 Q. Okay. The NRA Home Firearm Responsibility
24 Instructor, what is that about?

25 A. I -- through the Tampa Police Pistol and Rifle

1 Club, I taught handgun safety courses to the public for
2 probably about four or five years. I took 30 students at
3 a time once a month and we ran a handgun safety course.
4 That was a requirement that I -- that I fulfilled to give
5 me an extra credential for instructing through the pistol
6 club to that group of people.

7 Q. Again, the Law Enforcement Institute, this being
8 in 1980 as well, a seminar on civil laws and liabilities?

9 A. Yes, sir. Again, just trying to stay abreast of
10 current laws, and I would reflect on law enforcement
11 actions. Something that, as a manager, you almost have to
12 know. You're making decisions that you need to know
13 those -- how those things will impact your actions.

14 Q. Okay. State of Florida, the Commission on
15 Police Officers Standards and Training, Specialized
16 Training Certificate for Instructor's Techniques to Curtis
17 Judson Reeves?

18 A. Yes, sir. In order to teach, you needed to have
19 an instructor technique course, and then you needed to
20 update yourself periodically to stay current with your
21 teaching certificate.

22 Q. And in those particular courses, were they
23 teaching you some of the various things that we've talked
24 about all along?

25 A. Yes, sir, they did.

1 Q. Including officer survival?

2 A. I'm thinking that one is probably more on
3 presentation to students, the instructor technique. I
4 think it's how to make you a better instructor, how to use
5 training aids to capture the attention of your students,
6 that sort of thing.

7 Q. Okay. Tampa Police Academy Advanced Training
8 Certificate, Instructor Techniques. Again, 1979. I think
9 I had one of those out of order there.

10 A. Yes. That was a class sponsored by the
11 department. It's pretty much the same thing. We try to
12 keep the instructors at the academy, I guess you could
13 say, on the cutting edge. It's kind of easy to have two
14 hours' worth of material in a four-hour block. We tried
15 to have four hours of material in a two-hour block, and in
16 order for the students to capture it, they taught you how
17 to use all these available training aids to keep the
18 students' attention. Cops are -- it's kind of hard to
19 keep their attention.

20 Q. Public Safety Educators, Los Angeles,
21 California. I guess, by this time, you were Lieutenant
22 Curtis J. Reeves.

23 What was this about? Survival techniques again?

24 A. Yes, sir, survival techniques. That's -- that
25 was rising and that -- there was a need for that, that was

1 arising in the mid '70s. There was a lot of classes going
2 around, and I tried to avail myself or officers or people
3 that worked for me to do as many of those as we could.

4 That was a very important time for law
5 enforcement, I guess kind of like today is, you know.
6 Officer survival was -- a lot of agencies had lost
7 officers. We lost officers in Tampa, so it was a very --
8 that was the up-and-coming thing, was to teach your
9 officers how to go home every night, you know.

10 Q. Federal Bureau of Investigation Training School,
11 Effective Communication?

12 A. Yes, sir. That's how to communicate clearly and
13 concisely to your subordinates and to your peers, both
14 verbally and in -- with documentation, keeping an eye on
15 the legalities of the issues and that sort of stuff.

16 Q. International Association of Chiefs of Police.
17 I believe you mentioned this organization earlier. This
18 was a class on -- shooting classroom and range
19 instruction?

20 A. Yes, sir. That was a specialized class in
21 Wilmington, North Carolina, with a variety of federal
22 agencies. I think I was probably the only one there from
23 a municipal agency.

24 It was a class, I think, primarily for federal
25 weapons officers or weapons trainers. It had some

1 components of officer survival, carrying concealment, how
2 to use cover and concealment, whether it's a protective
3 cover or a concealing cover, that sort of thing.

4 Q. Law Enforcement Officers Training School,
5 Certificate of Attendance. This was another anti-sniper
6 and survival tactic school that you took in 1982?

7 A. Yes, sir. This was pretty much
8 self-explanatory. It was -- some of the weapon systems
9 had changed in a few years there, so it was a
10 familiarization with some of the new weapons systems that
11 were available and what was being encountered in the
12 public by law enforcement agencies and how to -- how to
13 kind of compensate for those kind of things.

14 Q. Fire Services Association taught this course on
15 Vertical Rope Rescue School.

16 What is Vertical Rope Rescue School?

17 A. Well, one of the things that -- to build skills
18 with the officers, we did a thing called rappeling,
19 traversing. Vertical Rope Rescue gets you used to
20 depending on your equipment, and you could be hanging on a
21 helicopter or rappeling out of a helicopter, off the side
22 of a building.

23 You could use the ladder to build steeples to
24 access second, third floors of apartment buildings, so it
25 was a skill building, and you learned how to depend upon

1 your equipment and your teammates.

2 Q. Certificate of Completion. This was a -- if I
3 can read it correctly -- it was a disturbance and control
4 seminar with the Central Florida Criminal Justice Regional
5 Training Center in Orlando?

6 A. Yes, sir. One of the skills that I acquired or
7 one of the responsibilities that I acquired during this
8 period was how to mobilize the agency expeditiously in the
9 event of a need for crowd control. I think the title is
10 disturbance or riot or crowd control.

11 So I visited several agencies and developed
12 what we call a Field Force Concept. That was a
13 mobilization and equipment plan for expediency in the
14 department in case something happened. And what came out
15 of that is I developed new SOP policies for the
16 department and new mobilization plan that the department
17 adopted.

18 Q. Certificate of Appointment, that is to certify
19 this is a certificate that's given in recognition of
20 successfully meeting requirements established by the
21 National Rifle Association for Curtis J. Reeves, Jr.

22 What was this about?

23 A. This was a -- again, a credential. It was a
24 course that -- that gave you all the safety requirements,
25 as well as the functional requirements, to a training

1 program and firearms utilization.

2 So it developed -- it developed your skills and
3 a training program that teaches you the whys and the
4 wherefores and the impacts of weaponry and that sort of
5 thing.

6 Q. Federal Bureau of Investigation presents this
7 certificate to Curtis J. Reeves. That's a management
8 seminar.

9 What was that about?

10 A. I went to the FBI academy a couple of different
11 times for a couple of different programs. That seems to
12 indicate that the FBI academy -- that was probably a --
13 pretty much what it says. A management seminar teaches
14 you how to manage folks, how to manage in the law
15 enforcement environment, how to manage legally, what your
16 legal responsibilities are.

17 In the event that you respond to a situation
18 somewhere in your community, you need to know what the
19 impactors are for the decisions that you make.

20 Q. State of Florida Department of Law Enforcement.
21 This was in, I guess, a program dealing with the executive
22 and organizational changes.

23 Tell me what that was about.

24 A. The -- I taught for the Executive Institute
25 courses, which was the FDLE. I presented several programs

1 around the State for them. As classes became available
2 that was of interest to me or of interest to my agency,
3 then I would try to get involved in those and find out
4 what it was all about so that I could use that in the
5 training seminars that I did for them.

6 Q. That was 1983.

7 FDLE, Florida Department of Law Enforcement
8 Organized Crime Institute, this was a special police focus
9 on criminal and extremist terror, National Conference For
10 Violence -- or On Violence, I should say, not for
11 violence.

12 A. I believe I was a speaker at that conference, if
13 I remember correctly. In any event, it dealt with -- that
14 was the terrorism of weapons of mass destruction, the
15 things that were kind of in the forefront of our country
16 during that time period. And if I'm not mistaken, I was
17 part of that program there, but I also attended it when I
18 (inaudible.)

19 Q. Okay. Models for Management seminar?

20 A. This was a training program for managers during
21 that time frame. There were several that were around, and
22 the department picked Models for Management as a program
23 to put the management team, I think -- I think sergeants
24 and/or maybe lieutenants went to that seminar, managing
25 people, skills that you need to manage -- effectively

1 manage people.

2 Q. Okay. Another one on the Commissions on
3 Criminal Justice Training. This is a career development
4 certificate, executive development-based law enforcement
5 officer.

6 A. This was probably a very basic program, and it
7 might have been a part of that incentive program I
8 mentioned earlier.

9 Q. Financial incentive?

10 A. Yes, sir. I think so.

11 Q. Department of The Army. Again, this is an
12 Advanced Marksmanship and Counter Sniper and Preparatory
13 Course?

14 A. Yes. This was held at the MacDill Air Force
15 Base. It was a -- I think it was one or two days a week
16 for probably about three or four months.

17 They had special -- specially trained -- some
18 of these guys were ex-military snipers that had been in
19 Vietnam, and they came down and shared their experiences
20 and we also learned how to shoot.

21 Again, it was a long-range training program for
22 long ranges, and we learned how to shoot smaller targets
23 closer which simulated long ranges. So it was a very
24 concentrated -- it was a national match shooting course
25 is what it was.

1 A lot of people don't know what that is, but
2 every year they have national matches in this country at
3 Camp Perry, and that was the program that developed the
4 marksmanship for that program.

5 Q. State of Florida Department of Law Enforcement
6 Organized Crime Institute, Ethnic Crime Seminar?

7 A. Yes, sir. One of the things that we always try
8 to do as an agency is to stay as diversified as we can.
9 So when programs came up that offered a different view of
10 the same subject, I always jumped at that.

11 Q. Florida Institute for Law Enforcement, this
12 is -- it looks like an executive development type of
13 course, Psychology of Management.

14 A. Yes, sir. That was an executive development
15 program that enhances your -- your ability as a manager of
16 people.

17 In law enforcement, that's a pretty -- you
18 know, you think about managing people in private
19 industry. It may not be quite as complicated as managing
20 officers in law enforcement. You have to be aware of the
21 legal aspects and vicarious liability aspects and all of
22 that kind of stuff. So these programs were designed to
23 keep that in the forefront in your mind.

24 Q. Florida Institute for Law Enforcement again,
25 another executive development program, Philosophy of

1 Management --

2 A. Yes.

3 Q. -- seminar?

4 A. Pretty much the same thing.

5 MR. ESCOBAR: Can you move it down just a tiny
6 bit there? There you go.

7 BY MR. ESCOBAR:

8 Q. Criminal Justice Standards and Training
9 Commission, again. This was an advanced criminal
10 investigation course which was taught by, I guess, the
11 Florida Department of Law Enforcement?

12 A. Yes, sir. I taught the criminal investigation
13 course at the academy for a number of years. One of the
14 things that I tried to do was just to stay up to date on
15 the latest technology, and that's the class that would
16 have done it for me.

17 Q. Okay. Federal Bureau of Investigation Executive
18 Development Seminar, again, 1987.

19 A. Yeah, that's a perspective from a different
20 agency on the -- on the models. I think that was taught
21 at a -- it was at a hotel there in Tampa Bay, but it was a
22 different perspective on the same --

23 Q. Management --

24 A. -- same management program.

25 Q. -- of people?

1 A. Yes, sir, of managing people.

2 Q. Okay. This is a Certificate of Appreciation
3 that was presented by the City of Tampa for 20 years of
4 valuable service to your community?

5 A. Yes, sir, a certificate by virtue of presence.

6 Q. Okay. State of Florida Department of Criminal
7 Justice Standards and Training Instructor Certification.
8 I think this was in 1988, if my eyes are correct.

9 A. Yes, sir. You -- periodically, you had to -- in
10 order to keep recertifications, you had to take classes
11 that would give you the opportunities to be recertified so
12 you could keep your instructor certificate. So that would
13 be one of the classes that you would take.

14 Q. Now, in addition to all of these certificates
15 that you were getting, were you in constant communication
16 with tactical units throughout the United States?

17 A. Yes, sir. Just about any time that any unit
18 around the country that had any kind of activity that we
19 found out about -- sometimes we would find out about the
20 community, sometimes we'd find out through the law
21 enforcement network, sometimes my contacts at the FBI
22 would let us know.

23 One of the things that I always tried to do was
24 contact that agency and find out what the issue was, find
25 out how they handled it, find out what kind of equipment

1 they used, what they did right, what they did wrong so
2 that we didn't make the same mistakes if we were
3 confronted with the same situation.

4 Q. Next. So those are resources that were
5 available to you that you all would share?

6 A. Yes, sir. I started -- I built some resources
7 early on when I started developing a team in 1972, and I
8 carried those -- most of those people through the end of
9 my career.

10 Q. This is another certificate dealing with police
11 community relations and leadership retreat.

12 A. The city had programs at that time where we had
13 interactions with -- law enforcement management had
14 interaction with the minority community. Some of them
15 were mandatory, some of them you signed up for. This just
16 happened to be one of the ones that I went to.

17 Q. Okay.

18 Another one dealing with police community
19 relations and leadership in that particular aspect of law
20 enforcement?

21 A. Yes, sir. I think -- during that time period, I
22 was kind of assigned to one of the districts, I think, and
23 when these kind of -- type of things came up, he sent me
24 out as the representative from the Police Department, so
25 they tried to keep me updated on -- on how to make those

1 presentations and -- you know, because everybody -- the
2 interaction with a lot of the community was sometimes
3 adversarial. My job was to go out there and turn that
4 around.

5 Q. This was another managing incidents course, and
6 not only managing incidents, but this was a managing major
7 incidents course; is that correct?

8 A. Yes, sir, it was. I was on a couple of
9 different committees.

10 One of the things that we found was that,
11 oftentimes, smaller jurisdictions didn't have the
12 capabilities to respond to the type of emergencies they
13 might be faced with. So through the committee we thought
14 it was a good idea to have some classrooms on how to
15 interact with agencies that you don't necessarily work
16 with on a regular basis.

17 Sometimes you can't communicate with them on
18 your radio systems and nobody had really had to do that
19 successfully up to that point, so this program kind of
20 helped get everybody on the same page, so that if they
21 did have a emergency and they were able to work together,
22 they could do so effectively.

23 Q. Delray Beach Police Department Street Survival,
24 1989, the Tactical Edge Seminar?

25 A. Yes, sir. That was -- that was a program that

1 kind of elaborates on the things that we've been talking
2 about, the officer survival.

3 The emphasis on that particular one there was
4 how to go home at the end of your shift, how to be
5 effective, how to anticipate danger, and how to -- one of
6 the things that we always had con -- not a conflict with,
7 but one of the things that was always an issue was as the
8 violence escalates, an officer only has so many tools on
9 his belt, so he has to be able to respond instantaneously
10 with the right tool under the right circumstances, and,
11 of course, if you don't do it, you'll be criticized.

12 So that program was designed in part to dole
13 out to the participants some training ideas that would
14 help out in that -- dealing with those issues.

15 Q. Another street survival, 1989. This just
16 actually happened -- it looks like it was conducted by
17 Caliber Press in 1980, I think.

18 A. I think it tagged onto that previous one. And I
19 think it was -- the Win Seminar, that was a heavy emphasis
20 on training an officer on how to anticipate danger, react
21 accordingly, and to go home at the end of the shift. So
22 it was a program that you could share with your officers
23 that may increase their survivability rate.

24 Q. International Association of Chiefs of Police,
25 SWAT Supervisors Tactics and Management, 1989.

1 A. That was -- several other agencies around the
2 State had been developing their SWAT teams and were coming
3 to us for some leadership and direction, and I was
4 doing -- I was trying to help them out.

5 The IACP kind of picked up on the fact that it
6 was becoming a little bit of a popular thing around
7 there, so they put together a conference over there for
8 most of the agencies actually in the southeastern United
9 States but mostly for Florida, and it was designed to
10 impart the tactics on how to manage a SWAT team. I don't
11 remember specifically, but I may have been a speaker at
12 that conference.

13 Q. Another Certificate of Appreciation, 25 years --
14 we can move to the next one --

15 A. Yes.

16 Q. -- Department of Law Enforcement. This was a
17 mutual aid issue concerning your SWAT team; is that
18 correct?

19 A. Yes, sir. That was the executive institute, I
20 think, with the FDLE. That was kind of what I
21 mentioned -- I alluded to earlier on how agencies can work
22 together effectively to combat a common problem.

23 The Fire Department had been doing that for a
24 couple of years. Law enforcement agencies were not quite
25 as successful, so it was kind of a statewide effort to

1 get everybody on the same page so they knew what the
2 expectations were.

3 Q. This is, The Tactical Response Team presents to
4 Captain C.J. Reeves in Recognition of 15 years of
5 Tenacity -- you can read that for me --

6 A. Guile and devotion to our calling. That was
7 presented to me after 15 years when I was transferred over
8 and became commander of the bomb squad.

9 Q. This is a certificate you received in 1991
10 titled, "Diversity"?

11 A. Yes, sir. That was -- that was how to -- how to
12 function effectively in your communities. That's what
13 you're learning how to do, and you're hoping to train your
14 officers to do that.

15 Q. 1991, another one dealing with, I guess,
16 "Demonstrations In The 1990s, A Law Enforcement Response?"

17 A. Yes, sir. That's, again, the civil disorder
18 that I alluded to earlier, one of the earlier ones that I
19 went to, how to organize and equip your officers to
20 respond to an emergency with a large group of officers.
21 That was the field force concept that I put into effect in
22 Tampa.

23 Q. Okay. This is a -- this is just a Certificate
24 of Appreciation?

25 A. Yes. This -- like I mentioned to you earlier,

1 oftentimes I was called upon to go out into the community,
2 either by virtue of my assignment or by virtue of my
3 personality, I don't know. But I was oftentimes called
4 out to go into the community to address these meetings and
5 to address their concerns about the crime in the
6 community, that sort of thing.

7 Q. Okay. This is the Fraternal Order of Police,
8 your Retirement Certificate that took place in 1993?

9 A. Yes, sir. That's the one that I've been looking
10 forward to for a long time.

11 Q. Okay. I think we've got one more.

12 A. Oh, okay.

13 Q. This was a plaque that was given to you for over
14 27 years of dedicated service between 1966 and 1993 by the
15 City of Tampa to Captain Curtis J. Reeves.

16 A. Yes, sir. Thank you.

17 MR. ESCOBAR: This may be a good time to take a
18 break.

19 THE COURT: Yes. Let's take 15 minutes.

20 (Recess taken.)
21
22
23
24
25

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT OF
THE STATE FLORIDA, IN AND FOR PASCO COUNTY
CASE NO. CRC14-0216CFAES

STATE OF FLORIDA,

Plaintiff,

vs.

VOLUME XV

CURTIS J. REEVES,

Defendant.

PROCEEDINGS: Stand Your Ground Motion

DATE: February 28, 2017

BEFORE: The Honorable Susan Barthle
Circuit Court Judge

PLACE: Robert D. Sumner Judicial Center
38053 Live Oak Avenue
Dade City, Florida 33523

REPORTED BY: Charlene M. Eannel, RPR
Court Reporter
PAGES 1819 - 1954

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Clearwater, Florida 33765
(727) 442-7288

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

THE COURT: You may continue, Mr. Escobar.

BY MR. ESCOBAR:

Q. Mr. Reeves, when did you start your employment with Busch Gardens?

A. That would have been October of 1993.

Q. And did you -- likewise, when you were with Busch Gardens, did you continue taking seminars in order to improve your knowledge and your ability of security issues now at amusement parks?

A. Yes, sir, I did.

Q. Okay. And what are we -- what are we seeing here, this Certified Protection Professional letter from 1995?

A. When I got there in 1993, there were two professional organizations, as I mentioned earlier, American Society for Industrial Security and American Society for Amusement Park Safety and Security. Both of them are national organizations.

And this is a letter -- in 1995, I became a certified protection professional, which is a program through the American Society for Industrial Security. It's their premier program for law enforcement -- or for security professionals.

It's one of -- it's a study -- it's about a

1 five-or six-month study, an all-day test and that sort of
2 thing. At that time, there was probably only about six or
3 seven thousand CPPs, which is certified protection
4 professionals, in the country.

5 So that was one of the things that I did to get
6 myself oriented into -- out of the law enforcement stuff
7 and into the security arena.

8 Q. This is a Busch Entertainment Corporation
9 Certificate.

10 What is this about?

11 A. Applied management. Again, it's a management
12 class designed to enhance your abilities as a manager.

13 Q. With people?

14 A. How to deal with people, not just the employees,
15 but also the guests that are coming in every day.

16 Q. American Society for Amusement Park Security and
17 Safety, what is this?

18 A. That's one of the organizations that I just
19 mentioned. It's a membership certificate. I think that
20 is when I joined it, in '94, that's when I found out about
21 it. And I was a lecturer at annual conferences for
22 probably all the way up until about 2003. I was the
23 president for 2003 and 2004.

24 Q. American Society for Industrial Security, again,
25 another Certificate of Membership?

1 A. That's a Certificate of Membership. And in
2 order to be a member of that group, you had to have some
3 management role in the security field.

4 And that organization also provided training,
5 and I think they call them CEUs, which were credits, which
6 each and every year you had to update yourself by taking a
7 certain amount of training courses.

8 Q. This next one is, "The Busch Entertainment
9 Corporation certifies that Curtis Reeves has successfully
10 completed communication skills, 1995."

11 A. Right. And that's along the same vein as
12 before. It's designed for -- so that you can -- it's to
13 give you the public relations approach to dealing with,
14 perhaps -- I guess you could say a little adversity in the
15 segments of community coming in. But when you say that,
16 it's really not -- they're mostly families, very little
17 problems.

18 But it's designed to make you a more effective
19 person to be able to deal with issues that they bring.
20 They're a microcosm of society, so it's only natural that
21 a few things come along with them that need to be
22 addressed by security.

23 Q. Okay. What is this certification? This is
24 Certified Protection Professional?

25 A. Yes, sir. This is that certification that I

1 mentioned earlier as a certified protection professional.
2 And each -- every year you had to have credits in order to
3 maintain that certification, so you're recertified every
4 two years.

5 Q. Is that a similar certificate?

6 A. Yes, sir, it is.

7 Q. Just in 1995?

8 A. Yes, sir.

9 Q. Situational Leadership Certificate that the
10 Busch Corporation gave you. What is this?

11 A. Well, I think it's -- if I remember correctly,
12 it's how to lead when you have some kind of an issue that
13 occurs in the park that attracts attention, either from
14 the media or from the guests themselves, how to deal with
15 that kind of problem, how to manage the employees, how to
16 minimize the impact that it has on the guests.

17 Q. Okay. Another training course for fundamental
18 concepts of security techniques?

19 A. Yes, sir. When I got to Busch, Busch
20 Entertainment Corporation was nine parks, Sea World, Busch
21 Gardens. They were kind of all over the country. They
22 really didn't have any cohesion, as far as coordinating
23 with each other. So probably the year after I got there,
24 I was kind of assigned as the chairman.

25 So we started having conferences and putting on

1 security seminars. And I also worked on a quantitative
2 evaluation procedure that could be used between each of
3 the parks to kind of standardize the procedures that they
4 had, whether it be dealing with people or dealing with our
5 cash control.

6 Millions of dollars flow through these parks and
7 we standardized how to effectively handle that money and
8 keep it as safe as we can.

9 Q. Okay.

10 A. I think I probably put that seminar together.

11 Q. American Society for Industrial Security. This
12 was another course in dealing with business security and
13 protection and prevention?

14 A. Yes, sir. They had guest speakers from all over
15 the country come in, and this was the latest -- on the
16 latest techniques to deal with some of the aspects that I
17 already mentioned.

18 Q. Okay. Again, from the American Society of
19 Industrial Security?

20 A. Yes, sir. That's a recertification of a
21 certified protection professional designation.

22 Q. And again, you had to take courses for each
23 certification?

24 A. Yes, sir. Either you had to be a participant or
25 a speaker in a certain -- you got credits for so many

1 different classes and so many hours of instruction, and
2 that's what it took to maintain those certifications.

3 Q. Okay. Another professional certification board
4 award; is that correct?

5 A. Yes, sir. It's a -- it's another
6 recertification of the certified protection professional.

7 Q. And another American Society for Industrial
8 Security; is that correct? This was a "Security
9 Challenges for the New Millennium."

10 A. Yes, sir. I started putting together two-day
11 security seminars on behalf of my chapter in Tampa, and I
12 got the Criminology Department of USF to help sponsor it.
13 So each year for about three or four years, I had a
14 two-day security conference that I put on at USF for
15 security professionals from all over the country.

16 And that's one of the classes that -- I don't --
17 I don't think -- I was a speaker at a couple of them. I
18 don't think I was at that one. I think I was just a
19 participant.

20 Q. And what is this?

21 A. I was chairman of the Tampa Chapter of American
22 Society for Industrial Security in 1999. That's -- that's
23 when I was a chairman.

24 Q. Okay. And what is this American Society for
25 Industrial Security Honorable Mention Award?

1 A. Those are -- in the security professional arena,
2 there's documentation and then there's activities that
3 each chapter performs. You're in a monthly or an annual
4 magazine as to what's available to you, what you've done.
5 This is an award for some of the programs that we put on
6 that year that I was the chairman.

7 Q. Okay. This is the Charles Knight Award. What
8 was that for? In outstanding recognition, I guess, for
9 your efforts on behalf of the chapter during the year
10 2000?

11 A. Yes, sir. That was -- actually, that was for
12 1999. The award was given in 2000. That's when I was the
13 chairman. We had several outreach programs that we -- in
14 conjunction with some of the programs that we put on for
15 security professionals all over the country, and that
16 was -- I think that came from the national, I think -- the
17 national group in conjunction with the security classes
18 that I put on at USF each year.

19 Q. Okay. What is the "Curtis Reeves 2000 Day of
20 Caring"?

21 A. This is a -- was a United Way program that I was
22 involved in where we performed some community service into
23 the -- in the community.

24 Q. Okay.

25 A. I think I was -- I might have been the

1 coordinator for that year for Busch Gardens.

2 Q. Tampa Area Safety Council put on a seminar for
3 violence in the workplace, Are You Prepared? I believe
4 that was in 1994, if I'm not mistaken?

5 A. Workplace violence was a hot topic during that
6 time frame, so one of the things that I did on the
7 security conferences that we put on at USF was included
8 some workplace violence, as well as some -- at that time,
9 we were talking about weapons of mass destruction and that
10 sort of stuff.

11 That was one of the programs that they put on
12 that gave me some information on the seminar that I was
13 going to put on.

14 Q. Okay. Now, this was a Certificate of Merit for
15 Handling People with Diplomacy and Tact. That was given
16 to you in the year 2001?

17 A. Yes, sir. If my memory serves me correct, that
18 was a program where it was a role play where you were
19 given -- in front of the class you were given a problem.
20 You kind of address their problem and you tried to use
21 tact and diplomacy in handling issues with individuals or
22 groups.

23 MR. ESCOBAR: Next.

24 BY MR. ESCOBAR:

25 Q. Another Security in the New Millennium course.

1 I guess this was a two-day course in 2001; is that
2 correct? The same as a --

3 A. That's another one of the classes that was at
4 USF. I think I was -- I was not a speaker at that one, I
5 don't think.

6 Q. Okay.

7 A. I was a fill-in guy. If one of the -- I had
8 instructors come from all over the country. Most of them
9 were from federal law enforcement agencies, whether it was
10 ATF or bomb or Federal Attorney's Office, that kind of
11 stuff here. Sometimes they'd miss a plane and they'd be
12 late, so I was the fill-in guy.

13 Q. This was a visitor safety and security summit
14 that was held in 2002 in Orlando that was -- you completed
15 that as well?

16 A. Yes, that was sponsored by the Orange County
17 Sheriff's Office. I completed that, yes.

18 Q. ASIS Florida West Coast Chapter of Domestic
19 Violence, Stalking in the Workplace, a virtual seminar?

20 A. Each year we had a -- we had a conference where
21 we recognized local law enforcement, and so we -- that was
22 one of the things that I had started there and did for a
23 couple years.

24 And if I remember correctly on this particular
25 one here, what we did is we had the officers that we were

1 going to recognize show up, and then area security
2 professionals from other chapters, and we had that program
3 at that seminar.

4 Q. Okay. I think we've got three more, Mr. Reeves.

5 The American Society for Amusement Parks
6 Certificate of Membership that you received in 2004; is
7 that correct?

8 A. Yes, sir. That's -- that's when I was the
9 president of the organization and I gave myself a
10 certificate.

11 Q. Okay. This is another ASIS certificate, and it
12 looks like it was an ASIS Homeland Security Conference.
13 And were you the speaker or one of the speakers in this
14 conference?

15 A. Yes, sir, I was.

16 Q. Okay. And what is this?

17 A. I think that's the certificate that when I first
18 was -- when I first passed the test and was a certified
19 professional, I think that's when -- I think that's the
20 certificate itself.

21 Q. Now, between your studies, both at the Tampa
22 Police Department, as well as in security with Busch, did
23 you learn certain survival techniques as well as cues to
24 recognize escalating patterns of violence?

25 A. I think that came primarily from my law