

1 IN THE CIRCUIT COURT FOR PINELLAS COUNTY, FLORIDA

2
3 STATE ATTORNEY INVEST

4
5 RE.

6
7
8 STATEMENT OF DAWN BIANCHI
9 _____ /

10
11 DATE/TIME: February 28, 2002; 10:00 a.m.

12 PLACE: Pinellas County Justice Center
13 14250 49th Street North
14 Clearwater, Florida 33762

15 REPORTED BY: Robert William Wagner
16 Notary Public,
17 State of Florida at large.

18 APPEARANCES:

19 MR. BRUCE BARTLETT, Esquire
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22 Clearwater, Florida 33762
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ORIGINAL

1 the car pull up really fast to the front door and a female
2 got out and rapidly when into the ER and then a guy got out
3 of the driver's side and he slammed his fist down on top of
4 the car really hard and he said fuck really loud. So at
5 that point, I went over to see what the problem was; and he
6 said, "My friend shot himself." And so I opened the door
7 and Shawn was sitting in the backseat slumped over to the
8 left.

9 Q. He was sitting in the right passenger side of the
10 backseat?

11 A. I think he was more in the middle and slumped.
12 Like he didn't fall out when I opened the door so he was
13 sitting far enough over that.

14 Q. Okay. And he was slumped toward the driver's side
15 or toward the passenger's side?

16 A. Driver's side.

17 Q. The door that you opened is the driver's side
18 door?

19 A. The driver's side rear door. It's a four door
20 car.

21 Q. Okay. Go ahead.

22 A. I could see blood on the kind of the right temple
23 area or right side of his head. He was unconscious. He was
24 breathing. I felt. He did have pulse. The guy who was the
25 driver said, "Is he dead?"

1 BY MR. BARTLETT:

2 Q. Okay. Go ahead.

3 A. I forgot where I was.

4 Q. I think you were the driver asked you if he was
5 dead.

6 A. Okay. And I said, "No." And then the girl came
7 back. I sent her back inside; and I said, "Tell them I need
8 a stretcher out here right away." And then she didn't come
9 back and no stretcher came. So I told the guy who had been
10 there with me to go in and tell them I had to have a
11 stretcher right away. He went back in and he came back out
12 and still no stretcher, and the girl came back out and I
13 sent her back in once again for a stretcher.

14 And then finally the nurse that I was working with
15 came out. No. Finally a security guard came out of the
16 ambulance doors; and I said to him again, "Get me a
17 stretcher." And then my partner came out and then we tried
18 to -- her and I tried to move to the car. We couldn't. He
19 was a big guy, and the male that got out of the car helped
20 us to get him out of the car and onto the stretcher.

21 Q. Okay. Do you recall whether or not his shoes were
22 on or off or any of that?

23 A. I really couldn't tell you. The officer from FDLE
24 asked me that too. I really couldn't tell you.

25 Q. Did you have to reposition his body to get him

1 out?

2 A. No. We just kind of dragged him out of the car.

3 Q. And put him on a stretcher? They take him inside?

4 A. Took him inside.

5 Q. Do either the male or female that were in the
6 vehicle make any statements to you about what had happened?

7 A. No.

8 Q. Did you overhear any conversations between the
9 male and female?

10 A. No. I heard talk in the ER from other people
11 afterwards, but not any of the people who were actually
12 involved in that.

13 Q. Did you ever see a gun in the back of the car?

14 A. I did not. I did feel around because the guy told
15 me he'd shot himself. So I was feeling for a gun just to be
16 sure I didn't get shot, or, you know, one of us. I did not
17 ever feel the gun. I felt under the seats. That's all.

18 Q. Could you see in there? Did you have a good
19 lighting visibility and everything else?

20 A. Reasonably. I mean it was streetlights out there.

21 Q. The reason I asked, you said you felt. That kind
22 of indicates to me you couldn't see because it was dark and
23 you were feeling --

24 A. Oh, it was dark but.

25 Q. -- as opposed to looking if you could see a gun?

1 A. Right. No, I felt.

2 Q. So that was --

3 A. In case he was laying on it or whatever I didn't
4 want it to go off when we were dragging him out. That's the
5 big thing.

6 MR. PORTER: So you really didn't look beyond
7 the seat?

8 MS. BIANCHI: I didn't. Honestly my
9 attention was focussed on him, you know, Shawn more than
10 anything. The quick check around him to be sure a weapon
11 wasn't laying right there and we accidentally gunshot
12 ourself.

13 BY MR. BARTLETT:

14 Q. So all three of you ended up getting him out of
15 the car as opposed to just the male that was in the vehicle?

16 A. Yes. It was myself, Dorothy Krause the nurse who
17 was on with me at the time, and then the guy.

18 Q. Did you all have each of you have part of his
19 body?

20 A. Yes. He was pulling from under his arms. I was
21 trying to help with his rear end and legs, and Dorothy also
22 was pulling from the top.

23 Q. And that was difficult to get him out of there?

24 A. Yes.

25 Q. You said -- you said something about you heard

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1 anything of that nature. I don't know if you've watched any
2 of the media coverage of this at all or anything like that?

3 A. I read the article that was in the paper, and I
4 talked to the FDLE guy, filled me in a little bit; but
5 beyond that not, no.

6 Q. So basically your knowledge of whatever happened
7 besides what was said in the ER by other nurses or employees
8 is basically what you've read in the media?

9 A. Right.

10 Q. When he was brought out, one of his shoes remained
11 in the back of the car. Is it possible that that could come
12 off as you were pulling him out?

13 A. It is possible because we really were like
14 dragging him. He was dead weight, and trying to get him
15 slumped over from the backseat onto the stretcher, which was
16 higher even than, you know, the seat of the car. So.

17 Q. You don't remember it falling off outside or
18 anything?

19 A. No.

20 MR. BARTLETT: Steve have you got anything?
21 Anything else?

22 BY MR. BARTLETT:

23 Q. Was any attempt ever made to clean up the car that
24 night to your knowledge?

25 A. Yes, I helped her.

1 Q. Okay. Tell me about that.

2 A. I think I told the FDLE. I'm a nurse. What do I
3 know. The girl came in there anything -- no. Not the girl
4 came in. The Tarpon Springs Police Department guy came in
5 and asked me, which one I don't know, and said, "Do you have
6 anything to help her clean her car?" So I got some towels
7 and I got some peroxide and I went out and actually myself
8 physically helped her clean the blood in the seat and down
9 on the floor.

10 Q. Anybody ever wipe any windows or any of that
11 stuff?

12 A. I didn't wipe any windows.

13 Q. Did you see any blood on any windows?

14 A. I don't recall.

15 Q. Did you see any blood anywhere else besides the
16 seat and the floor?

17 A. No.

18 Q. Did you ever see the gun?

19 A. No.

20 Q. Do you remember seeing his shoe on the floor?

21 A. No. There was no shoe on the floor at that point
22 when I went out to help her clean her car. There was no
23 shoe down there. Not in the driver's side. Passenger side,
24 I couldn't say if it was on the other side.

25 Q. Not in the driver side rear part?

1 doors are right there and there's the car?

2 A. Yes. These are the sliding doors to the -- right
3 here the sliding doors for the ambulance entrance.

4 Q. The passenger side is on the side closest to the
5 doors?

6 A. That's correct.

7 Q. Here is another photograph. I'm not sure in
8 perspective how that works.

9 A. These are the doors to the front I think right
10 here.

11 Q. Okay.

12 A. And over here then around that corner would be
13 sliding doors to the ambulance entrance.

14 MR. BARTLETT: Okay.

15 MR. PORTER: Bruce, this is the medical
16 records in case there's questions you want to ask about
17 that.

18 BY MR. BARTLETT:

19 Q. But your recollection is that the male exited out
20 of the driver's side?

21 A. That's my recollection.

22 Q. Do you remember seeing an empty bullet casing?

23 A. No.

24 Q. Do you recall one shoe being on one shoe being off
25 at all on him on the stretcher or anything like that?

1 A. No. When we got him into the ER, my attention was
2 focused on him. He needed to be intubated right away. So
3 that's where my attention was. That's better. This is the
4 front. These doors right there are the sliders to the
5 ambulance.

6 Q. There's the shoe I'm talking about.

7 A. When I helped her to clean her car this was not
8 there. So either they removed the shoe by that time; or
9 when I went out to help her clean the car, it was probably
10 two hours.

11 Q. Oh, significantly after?

12 A. Significantly after.

13 Q. The police had already been there and everything?

14 A. Yes, yes.

15 MR. BARTLETT: Hang on to those for a minute,
16 Steve.

17 (Looking At A Medical Form.)

18 BY MR. BARTLETT:

19 Q. Would this show who your receptionist was?

20 A. It might. Let me see.

21 Q. Here's the front end. Here. Admitted by M-A-R.

22 A. That would be the person.

23 Q. Who is that?

24 A. I don't know.

25 MR. PORTER: What's the name?

1 MR. BARTLETT: M-A-R is her initials.

2 MS. BIANCHI: It looks like M. Roberts, but I
3 don't know who that is.

4 BY MR. BARTLETT:

5 Q. Is that --

6 A. See if I can get a better signature somewhere in
7 here. I don't know who's signature that is.

8 Q. Okay. That's fine.

9 MR. BARTLETT: Anything else?

10 FURTHER EXAMINATION

11 BY MR. PORTER:

12 Q. When you helped clean the car was there a lot of
13 blood on the seat?

14 A. A fair amount, yes.

15 Q. Was this deep into the seat or were you just
16 wiping off the top surface?

17 A. I poured peroxide on it and kept blotting and
18 blotting to get it out.

19 Q. Blotting the seat?

20 A. Uh-huh.

21 Q. Okay. And was there also a lot of blood on the
22 floorboards you indicated?

23 A. Not so much on the floor, but mostly on the seat.
24 On the back of the seat and on the seat itself.

25 MR. BARTLETT: Okay. That's all we have.