

1 IN THE CIRCUIT COURT, FOURTH
2 JUDICIAL CIRCUIT, IN AND FOR
3 DUVAL COUNTY, FLORIDA.

4 CASE NO.: 16-2017-CF-539-AXXX-MA
5 DIVISION: CR-H

6 STATE OF FLORIDA

7 vs.

8 GLORIA WILLIAMS,

9 Defendant.

10 _____/

11 TESTIMONY AND PROCEEDINGS before the
12 Honorable MARIANNE AHO, Circuit Judge, Courtroom No.
13 406, at the Duval County Courthouse, Jacksonville,
14 Duval County, Florida, on Friday, May 4th, 2018,
15 commencing at 10:30 a.m., reported by Sharron A.
16 McLendon, Florida Professional Reporter.

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I N D E X

GLORIA BROWN WILLIAMS

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P R O C E E D I N G S

3 May 4th, 2017

10:30 a.m.

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THE COURT: May I speak with counsel at sidebar very briefly about Ms. Williams' case.

7

8

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(Whereupon, a sidebar conference was had out of the presence of the court reporter, after which the proceedings were resumed as follows:)

10

11

12

THE COURT: At this time the Court calls the case of Ms. Gloria Williams, 17-CF-539. It is 10:30 a.m. on May 4, 2018.

13

(Defendant present.)

14

15

THE COURT: Would counsel please enter your appearances for the record.

16

17

MR. MIZRAHI: Alan Mizrahi on behalf of the State of Florida.

18

19

MS. JOHNSON: Good morning.

Diana Johnson on behalf of Mrs. Williams.

20

21

MR. LUFRANO: And Matthew Lufrano on behalf of Mrs. Williams.

22

23

THE COURT: Good morning.

Ms. Williams is present.

24

THE DEFENDANT: Good morning.

25

THE COURT: How would you like to proceed at

1 this time, Counsel?

2 MS. JOHNSON: Your Honor, the defense would
3 call Mrs. Gloria Williams.

4 THE COURT: Very well.

5 Ms. Williams, if you'll please come forward.
6 Madam Clerk will swear you in, and then you will
7 please be seated.

8 THE CLERK: Please raise your right hand.

9 **GLORIA BROWN WILLIAMS,**

10 having been produced and first duly sworn as a witness,
11 testified as follows:

12 MS. JOHNSON: May it please the Court.

13 THE COURT: Yes.

14 MS. JOHNSON: Counsel.

15 MR. MIZRAHI: Yes, ma'am.

16 DIRECT EXAMINATION

17 BY MS. JOHNSON:

18 Q Good morning, Mrs. Williams.

19 Will you please state your full name for the
20 record?

21 A Gloria Brown Williams.

22 Q And, Gloria, do you have any nicknames?

23 A Quita.

24 Q How old are you today?

25 A Fifty-two.

1 Q And when were you born?

2 A November 20, 1965.

3 Q And to whom?

4 A To Wilbert and Gloria Brown.

5 Q Can you speak up a little bit?

6 A Oh, I'm sorry. To William, I mean, excuse
7 me, to Wilbert and Gloria Brown.

8 Q Where were you born and raised?

9 A New York City, New York.

10 Q And did you spend time elsewhere while you
11 were growing up?

12 A Yes, ma'am, in Ruffin, South Carolina.

13 Q Describe Ruffin.

14 A I spent the summers there with my
15 grandparents, which is my mother's family, and it was a
16 good childhood, outdoors. Being from New York it was
17 different definitely.

18 Q How so?

19 A Well, because I was used to the city and it
20 was real country. I felt like the bugs were bigger, it
21 was hotter there, and it was the city, I mean, excuse
22 me, it was the country.

23 Q And would you describe your childhood?

24 A It was good, it really was. I had lots of
25 friends, girlfriends coming up, childhood friends that

1 are still friends now, and we had a good time.

2 Q How were your parents?

3 A My parents were good. They were good people.
4 They tried hard with me. I had stubbornness in me at
5 times but, you know, for the most part they -- they
6 were really good people, and they worked hard. They
7 showed me, you know, what it meant to -- to work and to
8 build things and to take care of your family.

9 Q Did they always provide you with food and
10 shelter?

11 A Yes, always.

12 Q How would you describe your personality?

13 A I love to laugh. I love to smile. I'm a
14 caring person. I'm kind to those who are kind to me.
15 I try and treat people according to the way they treat
16 me, and even if they don't treat me right, you know, I
17 try to ignore that. For whatever reason, somebody
18 might be having a bad day, you know, I still try to
19 greet them the way I should.

20 Q And growing up, did you attend school?

21 A Yes, I did.

22 Q Did you ultimately get your GED?

23 A Yes, I did.

24 Q How old were you at that time?

25 A I was 17. I was ready to get out, and I

1 graduated before my class, so I wanted to graduate
2 before my class so I went and took my GED and got out
3 earlier.

4 Q Did you try to further your education after
5 obtaining your GED at that time?

6 A Well, I worked for a while, and after that I
7 decided, you know, I wanted to go back to school.

8 Q And where did you go back to school?

9 A Well, I went to Norfolk, Virginia, to Norfolk
10 State University.

11 Q And did you meet a man named William Bolden
12 there?

13 A Yes, I did.

14 Q Who is William Bolden?

15 A My first husband.

16 Q How old were you when you married Mr. Bolden?

17 A Twenty-two.

18 Q And did you have children from that union?

19 A Yes.

20 Q Who are they?

21 A My firstborn was Andre Bolden and my second
22 and my youngest was Antoine Bolden.

23 Q Did you ultimately graduate from Norfolk?

24 A No, I did not.

25 Q Why is that?

1 A Well, I got pregnant with Andre and I
2 decided, you know, I would go ahead and take a leave of
3 absence and raise him at that time and then go back.

4 Q What did Mr. Bolden, William Bolden do for a
5 living?

6 A He was an officer in the military.

7 Q Did that require moving a lot?

8 A Yes, it did. We moved. We lived in
9 Maryland. We lived in Virginia. We lived in Anderson,
10 South Tennessee and Elliston, Alabama. We were
11 overseas in Korea as well.

12 Q And were you often with the boys by yourself?

13 A Yes, ma'am.

14 Q And, ultimately, did you and Mr. Bolden
15 divorce?

16 A Yes, we did.

17 Q What was the custody arrangement?

18 A At the time I had physical custody and we had
19 visitation set up for him and the boys, and so he would
20 get -- I would have the boys during the school season,
21 he would get the boys and we -- during the summer and
22 we would alternate on the holidays.

23 Q Where did you go; where did you return after
24 the divorce?

25 A To South Carolina.

1 Q How did you get by as a single parent of two
2 children?

3 A Well, with support from my parents, they
4 helped me out a lot with the boys, so I worked two
5 jobs.

6 Q And you were still able to manage to spend
7 time with the kids?

8 A Yes, on my days off.

9 Q And be involved in your community?

10 A Yes.

11 Q Now, as an adult, describe your relationship
12 with your parents.

13 A Oh, I love them. I love them dearly.
14 They're good people. I think that old saying of how
15 when they get older, you know, you just watch them more
16 so now. It seemed like the roles are reversed and now
17 I'm trying to take care of them just like they took
18 care of me.

19 Q What type of things do you do with them?

20 A Well, sometimes me and mom, we go shopping,
21 take her when she needs to go somewhere, to doctor's
22 appointments, or the same thing with dad, you know.

23 Q And how often did you see them prior to your
24 incarceration?

25 A I think during the week I would see them

1 maybe three times during the week, maybe more. If they
2 needed something, you know, sometimes mom would say,
3 well, I need you to come and dust or something, I will
4 go and dust or, you know, maybe three times and then
5 maybe on Sundays when it was time for church.

6 Q And how often did you speak to them?

7 A Oh, I spoke with mom every day.

8 Q Were they involved grandparents to your
9 children?

10 A Oh, yes, yeah, they really were. They were
11 younger then and when the kids were younger, when we
12 were playing sports and stuff, they supported them a
13 lot, go to the games and, you know, like I said, mom
14 when she was younger she could get around, both of them
15 could get around better then, yeah.

16 Q And, Mrs. Williams, have you maintained
17 steady employment throughout your life?

18 A Yes, I have.

19 Q Where have you been employed?

20 A Well, before going back to school, several
21 different places. I worked at -- for Holiday Inn
22 Reservations Center. I worked for the State. I worked
23 with federal, in between jobs.

24 Q Did you also work at a nursing home?

25 A Yes, I did.

1 Q Where was that nursing home?

2 A Oakwood Nursing Home in Walterboro.

3 Q And most recently where were you employed?

4 A Recently I was at the VA.

5 Q The Veterans Administration?

6 A Yes, yes, I'm sorry, yeah, Veterans

7 Administration.

8 Q When were you hired their?

9 A I believe it was 2016, yeah, I think it was
10 the end of 20 -- no, yeah, in early 2015, oh, excuse
11 me, 2016.

12 Q And was part of that application process
13 through the Department of Defense?

14 A Yes.

15 Q And did that require a background check?

16 A Yes, an extensive background check.

17 Q And when did you change jobs in 2016?

18 A Well, I worked at the Veterans' Victory House
19 nursing home in Walterboro where it was a good place.
20 It was a very good place. I love those veterans, but I
21 just wanted -- I wanted change. I wanted to make more
22 money and I wanted a little bit more growth with my
23 degree. I wanted to move on.

24 Q And you mentioned with your degree,

25 Mrs. Williams. Did you go back to school at some point

1 in your life?

2 A Yes, when I was 48.

3 Q You were 48 years old?

4 A Yes.

5 Q Why did you reside -- why did you decide to
6 return to school in your late 40s?

7 A Well, I knew you couldn't -- in order for
8 more growth you had to -- you had to market yourself,
9 you had to -- you had to be -- well, you had to be able
10 to, you know, compete with others that had degrees or
11 more experience. I had experience but I didn't have
12 the degree, so I just wanted to be more marketable.

13 Q And what degrees have you obtained?

14 A Well, I've gotten my AA in business and BS in
15 health care administration.

16 Q And where did you go to school?

17 A Limestone College.

18 MS. JOHNSON: And, Your Honor, may I approach
19 the witness?

20 THE COURT: You may.

21 MS. JOHNSON:

22 Q Ms. Williams, I'm showing you what's been
23 marked as Defendant's Exhibit 1. Will you take a look
24 at those?

25 A Sure. Yeah, these are my school records.

1 Q And you received both your AA and BS from
2 Limestone College?

3 A Yes, ma'am.

4 Q Did you attend to further -- attend school to
5 further that education?

6 A Yes, ma'am.

7 Q Where was that?

8 A At Webster University.

9 Q And what were you seeking at Webster
10 University?

11 A My masters in management leadership.

12 Q And how far along were you?

13 A Well, I had five months left.

14 Q To obtain what?

15 A To obtain my degree in -- well, my masters in
16 management leadership.

17 MS. JOHNSON: And, Your Honor, permission to
18 publish to Your Honor as well as offer into
19 evidence Exhibit 1.

20 THE COURT: Let me hear from Mr. Mizrahi.

21 Any objection?

22 MR. MIZRAHI: No, Your Honor.

23 THE COURT: You're offering Defense 1?

24 MS. JOHNSON: Yes, Your Honor.

25 THE COURT: Very well.

1 Defense 1 is received into evidence, and
2 you're providing a copy for the Court; is that
3 right?

4 MS. JOHNSON: Yes, Your Honor.

5 THE COURT: Thank you.

6 (Whereupon, the document last-above referred
7 to was received in evidence as Defendant's Exhibit
8 No 1.)

9 BY MS. JOHNSON:

10 Q So you're about five months away from getting
11 your masters when you were arrested?

12 A Yes, that's correct.

13 Q While you were going to school, were you also
14 working full time?

15 A Yes, I was.

16 Q And outside of your employment and furthering
17 your education, were you also extremely active in your
18 community?

19 A Yes, ma'am.

20 Q What type of organizations were you a member
21 of?

22 A Well, I was a member of Buckhead United
23 Methodist Church, which is the place where I worship
24 at, and we were also part of United Methodist Women,
25 United Methodist Women Axillary, which is nationwide

1 through the United Methodist organization. I was
2 also -- well, I was also active with the school system
3 through our student counsel, well, not student counsel,
4 it was the -- well PTO, PTO/PTA.

5 Q And what is the Order of Eastern Stars?

6 A It's a Masonic organization through Prince
7 Hall masons.

8 Q And what type of community involvement did
9 that allow you to do?

10 A Well, we did a lot of fundraisers. We also
11 did a lot of community mission work as well. We went
12 to the nursing home or we collected things for
13 families, as far as that might have been burnt out or
14 flooded. We also -- we also did -- we did a lot of
15 community work as far as helping for food drives and
16 stuff. We have scholarship fundraisers for the kids
17 that were going off to college.

18 Q And what about the organization Tuskegee
19 Airmen?

20 A Tuskegee Airmen, I remember as a little girl
21 coming to South Carolina my granddaddy was a barber
22 there and he used to tell me stories about the Tuskegee
23 Airmen as I was coming up. Didn't know this until I
24 moved to Walterboro that the history of Walterboro was
25 that that's where they trained at.

1 Well, while I was working at the VA nursing
2 home the administration there decided that she wanted
3 somebody to be a liaison between the Tuskegee Airmen
4 and the facility, because it was veterans as well, and
5 we started talking, and I was telling her, I said, my
6 granddaddy used to tell me stories about Tuskegee, you
7 know, about the air pilots and stuff because they
8 trained in Walterboro. And she said, well, you should
9 be the liaison and, you know, work with them. And when
10 I told them all the history about them and the airplane
11 crash back in 1944 they were like, how did you know
12 that? I said, because he used to tell me these stories
13 as a little girl.

14 So, you know, I thought it was a real good
15 organization. I actually got to meet some of the
16 original Tuskegee Airmen, and that was awesome, you
17 know, to let them tell the story firsthand because they
18 were there. So it was a good organization. And what
19 they did every year, they have fundraisers as well and
20 they would sponsor scholarships for the local high
21 school kids there.

22 Q Were your children also involved in the
23 community organizations?

24 A Yes, they were. All the kids were acolytes
25 at church and part of the junior usher board. Well,

1 Alexis, she also went with us to Tuskegee when we used
2 to have these scholarship banquets. I believe
3 that's -- I think that's it, yeah.

4 Q And at some point when you were back in South
5 Carolina, do you remember meeting Charles Manigo?

6 A Yes, I do.

7 Q Okay. Who was he?

8 A He was my boyfriend.

9 Q How long did you date Mr. Manigo?

10 A Three years.

11 Q Describe that relationship.

12 A Well, in the beginning it started off good.

13 Q When did it begin?

14 A I would say maybe '90 -- '97, uh-huh, yeah,
15 early '97.

16 Q And it began as a good relationship?

17 A Yeah, it started off as a real good
18 relationship.

19 Q What occurred in that relationship?

20 A Mayhem, the violence. I just think...

21 Q Was there verbal abuse?

22 A There was verbal abuse.

23 Q What type? Describe that for us.

24 A The cursing, the calling of the names. You
25 know, you try to love somebody and, you know, I was

1 always taught, you know, if you love somebody then
2 somebody -- they love you back, and that just wasn't
3 the case with him, and I realize that now. You
4 can't -- the only person that can change somebody is
5 God, you know. He was just -- it's 22 years later, I
6 don't have the bruises anymore and God has healed my
7 heart, I don't hate him, but he took me to a place that
8 was dark, and my soul and my spirit was broke, my heart
9 was broke, and I don't wish that on anybody. I lost my
10 kids behind this. I lost my baby. I lost a lot. I
11 lost a lot.

12 Q And I understand what you're talking about,
13 but what type of actions occurred during this
14 relationship that caused you to lose your children and
15 a baby?

16 A The violence, the abuse as far as the hitting
17 and...

18 Q Where did he hit you?

19 A Well, he choked one -- a couple of times and
20 I passed out. The bruises, I tried to hide the
21 bruises, but listening to my family, you know,
22 listening to them yesterday, evidently they saw it, and
23 I used to try to hide it with clothes or with makeup or
24 something, but I think the last part of it was we were
25 fighting and he -- he pulled me some kind of way and

1 pulled my arm right out of the socket.

2 Q Did you ever have to go to the hospital?

3 A I probably should have went. I probably
4 should have went, but I didn't want to bring the police
5 into it because I knew they would probably arrest him,
6 but later on I just went to the hospital. It seemed
7 like every time I tried to do something with my arm or
8 something it would just pop out, pop out of joint, so
9 eventually the doctor suggested that I needed to go and
10 have surgery on it.

11 Q And did you have that surgery?

12 A Yes, I did. They put two screws in my left
13 shoulder.

14 Q While you were in that relationship with
15 Mr. Manigo, did you become pregnant?

16 A Yes.

17 Q When was that?

18 A In '98.

19 Q Did you tell Mr. Manigo about your pregnancy?

20 A Yes, I did.

21 Q And was he excited about that?

22 A Yes, he was.

23 Q What did you believe that pregnancy would do
24 for you guys?

25 A I thought that would bring peace to us. I

1 thought that, you know, this is what he needed. He
2 wanted to have a baby. He asked me to have a baby, and
3 I was like, I've already got two kids. My kids were I
4 think ten, ten and nine or eight and nine at the time.
5 And he was like, well, I don't have any children, you
6 know, I want a baby and, you know, that's what's going
7 to make me stable, that's what's going to help me, you
8 know, so I believed that. I wanted to believe that. I
9 thought that would help.

10 Q And tell the Court about your pregnancy in
11 1998.

12 A Well, it was -- it started off to be a good
13 pregnancy, it did, and I was, for the most part,
14 healthy during -- you know, during the early parts of
15 it, but after the abuse and stuff and I think the
16 stress from all of that just -- it just didn't let the
17 pregnancy go on.

18 Q And what happened?

19 A I miscarried.

20 Q Did you go to the doctor?

21 A Well, I called them. At the time I didn't
22 have insurance, and it was like I told them I was
23 bleeding, and they was like, well, you -- that's normal
24 for the first trimester, and I was like, well, you
25 sure, I'm bleeding a lot. They was like, yes, if it's

1 still -- if it keeps up then come in and we'll go to
2 the emergency room. And, you know, back then they
3 didn't want to see you if you didn't have insurance, if
4 you couldn't afford to pay.

5 Q What happened to your body?

6 A Oh, gosh. I didn't realize that I had the
7 miscarriage, as I thought just as the doctor said that
8 I was spotting, that, you know, this was a part of, you
9 know, the processes since I hadn't had a baby or been
10 pregnant, you know, in a long time, that my body was
11 trying to accustom -- get accustomed to it, and my body
12 continued to grow, my breasts continued to grow, and I
13 assumed that everything was fine.

14 Q So you felt like you were still pregnant?

15 A Yes, I did.

16 Q But did you, in fact, miscarry?

17 A Yes, I did.

18 Q And during the abusive relationship, were the
19 boys, Antoine and Andre, still living with you and
20 Charles Manigo?

21 A Yes.

22 Q And, ultimately, were they taken from you?

23 A Yes, they were.

24 Q Where was that? Did they go to their
25 father's house?

1 A Yes, they did.

2 Q And when did that occur?

3 A I guess it was sometime -- it was sometime in
4 '98. I can't -- I think maybe the summer, no, it might
5 have been before then.

6 Q Spring or summer?

7 A Yeah, it was somewhere around there.

8 Q Of 1998?

9 A Yes.

10 Q And was Mr. Manigo at home during that spring
11 or summer of 1998?

12 A No. He got arrested. He was in jail.

13 Q So he was in jail during that spring or
14 summer of 1998?

15 A Uh-huh, yes.

16 Q Were you still working during all that?

17 A Yes, I was.

18 Q Where were you employed?

19 A Well, at the reservation center in Charleston
20 for Holiday Inn and also at the nursing home.

21 Q On July 10th, 1998, what happened?

22 A I left work. I left work. It's when I was
23 working in Charleston. I was heading home.

24 Q How far is Charleston from Ruffin, South
25 Carolina?

1 A I'd say 35, 35 minutes, somewhere in there.
2 It depends on who is driving.

3 Q And what road would you take from Charleston
4 to Ruffin?

5 A Well, Charleston you take 17 going back into
6 Walterboro.

7 Q And that's how you would normally get home?

8 A Yes, uh-huh.

9 Q What did you do on July 10th, 1998?

10 A Well, I was heading home and I took 17, when
11 I got into Walterboro I just, I don't know, I just felt
12 like I was on autopilot and I got on 95 South and just
13 headed south.

14 Q Where were you going?

15 A I don't know. I had no plans, nothing. I
16 don't know. I just felt like I was on autopilot. I
17 just, I was depressed. I was extremely just depressed
18 and...

19 Q Why?

20 A Because my life was out of control. I lost
21 everything. You know, well, I didn't at the time
22 didn't lose the baby, but I lost the boys and my life
23 was just out of control, you know, I didn't -- like I
24 said, I didn't know that I had lost the baby, so it was
25 just, you know, I was just depressed because I'm like,

1 why is my life like this, you know.

2 And my family didn't know what was going on,
3 I didn't let them in. I kind of kept my distance from
4 them and -- because they were used to me always being
5 that smiley person and, you know, always trying to put
6 my best foot forward, so I just was not letting them
7 know this nightmare I was living. You know, I left one
8 marriage and, I don't know, I guess my heart was really
9 trying to heal from that, and I just felt like I was in
10 mourning, and then to get into the relationship with
11 Mr. Manigo, you know, I'm like, okay, this is going to
12 be good, this is going to be better, you know, it
13 just -- but right after that it was just -- it was just
14 too much.

15 Q And the baby that you were pregnant with in
16 1998, had you done any planning for that child's
17 arrival?

18 A Yes, I did.

19 Q What type of planning?

20 A Well, painted the room. We had a third room
21 in the house, and painted the room and my parents
22 brought a crib and they gave me a baby shower.

23 Q Where was that baby shower?

24 A That was at my parents' house.

25 Q And by July 10, 1998, you had, in fact, lost

1 that baby?

2 A Yes, ma'am.

3 Q And so you were leaving work from Charleston?

4 A Uh-huh.

5 Q To go back home to Walterboro?

6 A Well, go back to Ruffin. I was staying in
7 Ruffin.

8 Q And somehow you got on 95 you said?

9 A That's correct.

10 Q All right.

11 A 95 South.

12 Q And I asked you where you were going?

13 A I have no clue. I had no plans. I was
14 not -- did not have anything packed or anything.

15 Q You didn't have anything in the vehicle with
16 you?

17 A Just a baby car seat.

18 Q And what was that from?

19 A The was from the baby shower.

20 Q And what time of day or night was that when
21 you got on 95?

22 A I want to say it was -- it was still
23 daylight, yeah, it was still daylight.

24 Q And what were you thinking about during your
25 drive?

1 A I really couldn't tell you, but it couldn't
2 have been good. I just really couldn't tell you. It
3 just -- I don't know. I don't know what was going on.
4 I don't know.

5 Q Did you ultimately get off of an exit on 95?

6 A Yes.

7 Q Do you know where that was?

8 A Here in Jacksonville.

9 Q What was your intent at that time?

10 A It was definitely not to take a baby, that's
11 for sure. I don't know. I can't -- I mean, it almost
12 20 -- 20 -- 20 years ago. I can't tell you. I really
13 just cannot tell you what was on my mind in my head
14 back then. I was a different person. My head was in a
15 different place. I was -- I was just broken. I had a
16 broken heart. I had a broken spirit. I didn't feel
17 good about myself. I didn't feel good about anything,
18 you know. I just felt like a robot. I knew I had to
19 go to work. I knew I had to -- I had to eat, so I had
20 to keep working, you know. I was by myself. I was a
21 single parent with nobody else bringing in any money,
22 so I had to keep doing what I had to do.

23 Q And did you ultimately end up at a hospital?

24 A Yes, I did.

25 Q What was your intention when you entered the

1 hospital?

2 A I don't know. It just wasn't -- my intent
3 was not to take a baby. It wasn't. I just sat there.
4 I sat there fighting with myself, I guess, and that's
5 how I felt, fighting myself. I did go to the floor to
6 look at the babies in the ward and just looked at them
7 and just thought about the baby I lost.

8 Q And did you ultimately enter Shanara Mobley's
9 room?

10 A Yes.

11 Q Why is that?

12 A I don't know. I didn't know Shanara, I
13 didn't know anybody, and I didn't know what she had or
14 anything, and I didn't know who about -- I didn't even
15 know whose room I was entering in. I knew it was a
16 woman, but I didn't know whose.

17 Q Did you speak to Mrs. Mobley -- Ms. Mobley at
18 that time?

19 A Yes, I did.

20 Q Was the baby in the room when you first
21 entered?

22 A No.

23 Q How long were you in Ms. Mobley's room?

24 A We talked. She wanted to get cleaned up, and
25 I guess the nurse was taking too long, so I went down

1 the hall and got her a gown, a fresh gown, and I came
2 back and kind of helped her, and we talked. She talked
3 about the family, about her family and that's it.

4 Q Was anyone else in the room with her at that
5 time?

6 A No.

7 Q Did they ultimately bring a baby girl in?

8 A Yes, they did.

9 Q What was going through your mind during that
10 time?

11 A I don't know. I don't know. I just -- I was
12 thinking about, you know, maybe this baby could help
13 Charles, that's what I was thinking. And after me and
14 Ms. Mobley was talking it was like she was so young and
15 she just wasn't real sure about what she was going to
16 do, and just my mindset at that time it wasn't logical,
17 it definitely wasn't logical, you know, but from what I
18 was thinking at that time it seemed right, it just
19 seemed right.

20 Q And did you ultimately take that baby girl
21 out of the hospital?

22 A Yes, I did.

23 Q Where did you take her?

24 A To South Carolina.

25 Q Did you change her name?

1 A Yes, I did.

2 Q What did you change it to?

3 A Alexis Kelli.

4 Q Did you ever change her birth date?

5 A No.

6 Q What was it like to raise her?

7 A Alexis was a doll baby. She was a joy.

8 Q What did it mean to you to bring a baby girl
9 home?

10 A Well, I was -- I don't know. My mind was
11 just -- my mind was gone, it really was. I just
12 thought, you know, this would bring peace, peace to --
13 to the house, you know, the abuse would stop, the
14 violence would stop, and it didn't.

15 Q Did you ultimately leave Mr. Manigo?

16 A Yes, I did, after I lost the boys. And it
17 was just me and Alexis and him and, you know, he was so
18 happy that we was a family, and I was like, we're not a
19 family because I've got two people missing and, you
20 know, like I said, I thought it would bring peace to
21 the family, it didn't, and I just thought to myself, I
22 can't have him around her, I can't do it, and she
23 deserves better, and that's when I had enough courage
24 to leave the relationship then but, like I say, by this
25 time I had lost everything.

1 Q And when you brought Kamiyah Mobley back to
2 South Carolina, did you raise her as your own?

3 A Yes, I did.

4 Q How did you raise her?

5 A I'm not sure about that question. Can you...

6 Q Did you get her medical treatment?

7 A Yes, I did.

8 Q Did she have regular dental checkups?

9 A Yes, she did.

10 Q Was she in dances and recitals?

11 A Yes, she -- she did dance for a while,

12 uh-huh.

13 Q Was she also a cheerleader?

14 A Yeah, she was a cheerleader.

15 Q What was expected of Alexis growing up?

16 A To be a respectful person, respect your
17 elders, to -- to treat people in a kind manner. She
18 had rules to live by, and she wasn't -- you know, she
19 was a princess, but she still had rules.

20 Q Was she required to go to school?

21 A Ma'am?

22 Q Was she required to go to school?

23 A Oh course, yes.

24 Q Did she have duties around the house?

25 A Yes, she did. Well, all of them, her and

1 when the boys were there, they have chores like washing
2 dishes, you know, cleaning their rooms, keeping their
3 rooms clean, making sure homework -- definitely making
4 sure homework was done.

5 Q Was she also involved in the community?

6 A Yes, she was.

7 Q What's the Mary B. Thomas Girls?

8 A The Mary B. Thomas Girls is an affiliate of
9 the Order of Eastern Stars where we teach young women,
10 young girls how to be young women and the power to be
11 independent and to, you know, move on to do things in
12 the community that, you know, that strengthen women.

13 Q Was she also involved in the church?

14 A Yes, she was an acolyte in the church.

15 Q And what's the --

16 A Also -- I'm sorry, she was an acolyte also in
17 the junior usher.

18 Q What is the National Young Scholars?

19 A The National Young Scholars is a -- is a
20 program through -- well, throughout the school at the
21 time and it's an academic achievements, and she, Alexis
22 at the time was A, A honor roll as far as science and
23 math, or mathematics, and she got, well, I guess, an
24 invitation to come there and to participate in their
25 pre-med program there, which was at Wake Forest

1 University Wake Forest, North Carolina, and that
2 program was so awesome. It just kind of blew my mind.

3 And the children there, she was -- she must
4 have been about nine or ten, and the organization just
5 was awesome. I never met so many kids that were so
6 focused on what they wanted to be. I think her
7 roommate at the time was a little girl from Tennessee
8 named Katie, and Katie was just a little country --
9 sweet little country bell, and she said, I want to be a
10 neurosurgeon, and I was like, neurosurgeon. So, you
11 know, Alexis told her, well, I want to be a
12 pediatrician. I was like, wow, I just don't remember
13 at that age wanting to, you know, already have my life
14 planned out. So I was happy she was able to
15 participate with that, you know. I encouraged her to
16 do it because I think ever since she was four years old
17 she's been wanting to be a doctor.

18 Q And was she enrolled in preschool?

19 A Yes, she was.

20 Q At what age?

21 A Three.

22 Q And did she attend kindergarten?

23 A Yes.

24 Q And did she ultimately graduate at 17 years
25 olds -- 17 years old from high school?

1 A She did.

2 Q And did she plan to go to college?

3 A Yes, she did.

4 Q What were those plans?

5 A She wanted to be a paralegal, and she went
6 to -- she went to a couple school tours, college tours.
7 She went -- her and I went to the University of South
8 Carolina Columbia, just to kind of give her an idea of
9 how it meant to be like on campus and stuff, so she got
10 to experience that.

11 Q So you did do a college campus tour?

12 A Yes.

13 Q Was she a healthy child?

14 A Yes, she was.

15 Q A happy child?

16 A She was, she was very happy.

17 Q Was she a respectful child?

18 A Yes, she was.

19 Q How was the relationship between the two of
20 you?

21 A Well, if you saw her, you see me. And it was
22 just so funny, I guess there was a difference between
23 her and -- and the boys. At school everybody was like,
24 that's Lexi's mom. I just I wasn't Ms. Bolden anymore,
25 I was Lexi's mom. So that's what they remember because

1 it was always her, they remembered her first.

2 Q And was she also close with your two boys,
3 Andre and Antoine?

4 A Oh, yeah. They -- they spoiled her.

5 Q And is she close with your parents?

6 A Very close. And she calls -- well, because I
7 call my daddy daddy, she just picked up on it and
8 started calling him daddy. I was like, no, that's
9 granddaddy. She knew who he was, but she just said
10 daddy because that was the nickname.

11 Q And, Mrs. Williams, outside of raising Alexis
12 and your two other children, tell us about your life in
13 South Carolina. Who were you married to?

14 A To -- I was married to Wenoskie Williams.
15 I'm still married to Wenoskie Williams.

16 Q Tell us about Mr. Williams.

17 A He's a God fearing man, and I thank God for
18 him. He is -- you know, I didn't know that it could be
19 this way.

20 Q What way?

21 A To love someone, to experience that, you
22 know, and it was easy, it was easy for him. He was --
23 he was just a good, good person. I used -- he's just a
24 good person. I just love him so. You know, he's
25 been -- he's been so, so supportive. I just thought

1 after this came up that he would be gone, you know.

2 Q And, in fact, has he come up pretty much
3 every Saturday for the last 16 months?

4 A Yes, he has.

5 He's my friend, he's my lover, my husband,
6 and I couldn't ask for a better person to be around me,
7 my children, and he's a hard working man. I respect
8 him and I just adore him.

9 Q And now, Andre and Antoine are grown men and
10 have been out of the house for sometime, but tell us
11 about your relationship with them as adults.

12 A Oh, I still -- those are my boys. Andre, my
13 oldest, oh, gosh, they've just grown up to be amazing
14 men, and he's such a quiet person and laid back and
15 he's just like a tender giant. That's what I see in
16 him. We talk all the time, and we always had a good
17 relationship. We talk about life and, with my kids, we
18 always had that open door policy. They come to me
19 about anything, and we can talk about anything, and
20 sometimes the talks used to get real crazy. I'm
21 thinking to myself, oh, my gosh, don't you have any
22 friends you can tell this to, but I was -- I was
23 grateful that they felt comfortable enough to come to
24 me and talk to me about these things.

25 And I didn't judge them. I didn't -- I

1 didn't say, boy, did you do that or, you know, I
2 didn't -- I didn't have to do that with them because I
3 wanted them to -- you know, I wanted to give them the
4 truth as I knew it. I didn't want them to learn it out
5 in the streets or hear it different somewhere else, so
6 I gave them the truth as I knew it.

7 Q And do you now have grandchildren?

8 A Oh, yes, I got -- those sweet little people,
9 oh, man, I miss them, I do, I miss them.

10 Q How many grandchildren?

11 A I have four.

12 Q And who are they?

13 A My oldest and my only girl is Ladravia, and
14 she's nine. Now, I have, when I say grandchildren I
15 say four, and when I say kids I say five, because I
16 can't forget my stepchildren, and so I'm talking about
17 when I say four, my two and my other two, Erica's
18 children as well. So Ladravia is nine, and she's a
19 princess as well and she's the oldest, Akia, he's
20 eight, and then we have Jonah and Aiden who are both
21 three.

22 Q And did you get to spend a lot of time with
23 them prior to your incarceration?

24 A Yes, every summer, and then Aiden and Akia
25 lived in Walterboro, so I got to see them all the time.

1 MS. JOHNSON: And, Your Honor, may I approach
2 the witness?

3 THE COURT: You certainly may.

4 BY MS. JOHNSON:

5 Q And, Ms. Williams, I'm approaching you with
6 Defense's Exhibit 6. Can you take a look at those and
7 tell me what those are?

8 A They're my baby shower, that first picture.

9 Q That's a picture of what?

10 A My baby shower. That was me. I was huge.

11 Q And what does the next photo depict?

12 A Ma'am?

13 Q What does the next photo depict?

14 A This is my living room.

15 Q What is depicted in your living room?

16 A Photos of my family and my Bible and my
17 trophies and -- well, not my trophies, but my husband's
18 trophies, and some of my certificates, award
19 certificates.

20 Q And what about the next photo?

21 A The next photo is, again, family pictures and
22 more certificates on this side and Alexis' diploma.

23 Q And the next photo?

24 A This is our children's area. The kids' toy
25 basket and their chair that they would sit and watch TV

- 1 with.
- 2 Q Is that for the grandchildren?
- 3 A Yes, it was, uh-huh.
- 4 Q And the next photo?
- 5 A Alexis' room.
- 6 Q And what about the next photo?
- 7 A Alexis' room, her closet, rocking chair.
- 8 Q And the following photo?
- 9 A A family photo.
- 10 Q Who is depicted in it?
- 11 A Alexis and the two boys and myself.
- 12 Q And the following photo?
- 13 A Alexis at two.
- 14 Q And the next one?
- 15 A Alexis at four.
- 16 Q And the following one?
- 17 A Alexis at three.
- 18 Q And the following?
- 19 A This is when she was child of the day and she
- 20 was two.
- 21 Q Where was she child of the day?
- 22 A At the daycare.
- 23 Q And the following photo?
- 24 A This is her yearbook.
- 25 Q From where?

1 A From Bells Elementary, her elementary school.

2 Q And the following?

3 A This is her certificate for outstanding
4 service from the Mary B. Thomas Girls.

5 Q And the next one?

6 A And this is the Stephen family reunion
7 banquet, and they gave her a award, academic
8 achievement for honor roll student, and she received a
9 checks for \$100.

10 Q And who is the Stephens family?

11 A My -- my mother's family.

12 Q That's your mother's maiden name?

13 A Yes.

14 Q And the following photos?

15 A These are her senior pictures.

16 Q And the next one?

17 A This is her invitation, yeah, this is her
18 invitation for graduation.

19 Q And the following photo?

20 A This is one of her pictures she got paid for
21 in a photo shoot, that's when she took several
22 different photos. So this is one of her pictures with
23 her cap and gown.

24 Q For graduation?

25 A Yes.

1 Q And the following photo?

2 A Her graduation pictures, I mean, excuse me,
3 her diploma.

4 Q And the following one?

5 A A picture of me and her just taking selfies I
6 guess.

7 Q And how old was she in that photo?

8 A I want to say she was 11.

9 Q And the following one?

10 A That was one Christmas and she got a scooter,
11 she got games and all kind of stuff.

12 Q And the next one?

13 A Well, it's just a collage of pictures here,
14 baby pictures, her christening picture, and my wedding
15 picture, and she was a flower girl.

16 Q Was that the wedding to Mr. Williams?

17 A Yes. And one of her spring fling pictures at
18 the bottom.

19 Q And the following photo?

20 A A picture of her and I.

21 Q How old is she in that photo?

22 A Seven.

23 Q And the last photo?

24 A A picture -- a family picture of myself and
25 my husband and Alexis.

1 MS. JOHNSON: And, Your Honor, I'd like
2 permission to publish to Your Honor before offering
3 into evidence.

4 THE COURT: Any objection?

5 MR. MIZRAHI: No, Your Honor.

6 MS. JOHNSON: And this is Composite 6, Your
7 Honor.

8 THE COURT: You're not introducing them yet?

9 MS. JOHNSON: Not yet. I'd like to publish
10 them to Your Honor first.

11 THE COURT: For the record, I have reviewed
12 all of the photographs contained in what is marked
13 for identification as Defendant's Exhibit 6, which
14 photographs are not in evidence, but I have
15 reviewed them.

16 MS. JOHNSON: And, Your Honor, we would offer
17 them into evidence at this time.

18 THE COURT: Any objection?

19 MR. MIZRAHI: No, Your Honor.

20 THE COURT: Defendant's Exhibit 6 as a
21 composite exhibit is received into evidence.

22 (Whereupon, the documents last-above referred
23 to were received in evidence as Defendant's
24 Composite Exhibit No. 6.)

25 BY MS. JOHNSON:

1 Q Now, Mrs. Williams, it was you that
2 ultimately told Alexis that she was, in fact, Kamiyah
3 Mobley?

4 A That's correct.

5 Q Tell the Court how this occurred.

6 A She had gone to Shoney's and she wanted to --
7 she wanted to work. She wanted to work.

8 Q Shoney's, is that a restaurant?

9 A Yes, in Walterboro. And she came home and
10 she said, mom, I need my birth certificate and Social
11 Security card so I can get a job, they already told me
12 I could come on in, and that's when I told her. I
13 started crying, and she was like, what's wrong. I
14 said, sit down, I have to tell you something. I said,
15 sit down, I have to tell you something.

16 And we were outside on the front porch, and I
17 told her, I said, you're not my daughter, I said, I
18 took you a long time ago, and she didn't understand.
19 She went to talking about, you know, and I guess when I
20 started crying that's when she, you know, like, you
21 know, this is not mom. I -- this is not her.
22 Something is wrong. Something is truly wrong. And it
23 was just too much. And I told her then and she still
24 didn't believe me, and I got on the phone and I punched
25 in some, you know, websites, I guess, and I showed her

1 and she said, that does look like me, and I said, yeah,
2 that's you.

3 Q And what were you showing her?

4 A Just like I guess it was a flyer or something
5 that was on here or something. I don't know which
6 website it was, but it was just something. I pushed up
7 Florida something and it might have been missing kids
8 or something, and I searched for the name and that's
9 how, that's how I told her.

10 And she just -- she just didn't believe it at
11 the time, but I think once we sat down and we talked
12 more about it, you know, and I guess me, you know, just
13 crying about it, I guess she just felt like, you know,
14 there is some truth to it, because I told her I didn't
15 have that, I didn't have a birth certificate or a
16 Social Security card.

17 Q And at that time did you offer to turn
18 yourself in?

19 A Yes, I did.

20 Q How did she react?

21 A She didn't want me to do it.

22 Q And was that about a year and a half, two
23 years before --

24 A Yes.

25 Q -- your arrest?

1 A Yes.

2 Q How old was she at the time?

3 A Sixteen.

4 Q And at some point did -- did you get a call
5 from detectives from here in Jacksonville?

6 A Yes, ma'am.

7 Q And was that early January of 2017?

8 A Yes, it was.

9 Q And what were they wanting?

10 A For me and Alexis to come and speak with
11 them.

12 Q Did they ultimately want her DNA?

13 A When we got down there they asked for it, and
14 she didn't want to give it at first, and I told her,
15 you know, don't -- don't argue with them, go ahead and
16 give it to them.

17 Q And you told her that knowing that the truth
18 was on the horizon?

19 A Yes, I did.

20 Q That your arrest was imminent?

21 A Yes, I did.

22 Q Did she ask you to do anything at that time?

23 A She wanted me to run. I told her I couldn't
24 do that. I couldn't leave her. I couldn't. I just I
25 couldn't do it, I couldn't, you know. I couldn't have

1 a life like that. I was already in this for too long
2 and the truth was going to come out.

3 Q And did you, in fact, stay in town?

4 A Yes, I did.

5 Q And ultimately there was an arrest warrant
6 for you?

7 A Yes, there was.

8 Q And you were picked up on that arrest
9 warrant?

10 A Yes, I was.

11 Q What time of day was that?

12 A Around four o'clock in the morning.

13 Q How were you dressed?

14 A In my nightclothes.

15 Q Where were you taken upon your arrest?

16 A To the Colleton County Jail.

17 Q And was part of that, after your arrest, was
18 that part of that audio and video recorded?

19 A Yes, it was.

20 Q And at some point did the detectives allow
21 Alexis to come in and say good-bye to you?

22 A They did.

23 Q And was that portion audio and video
24 recorded?

25 A Yes, it was.

1 Q And have you been able to watch that video?

2 A Yes.

3 Q And is it an accurate depiction of your
4 relationship with Alexis?

5 A Yes, it was.

6 MS. JOHNSON: And I just want to play a few
7 short clips from this long video, and it is marked
8 as Defense Exhibit 3, Your Honor.

9 THE COURT: Any objection?

10 MR. MIZRAHI: No, Your Honor.

11 THE COURT: You may proceed.

12 MS. JOHNSON: Thank you, Your Honor.

13 Permission to publish?

14 THE COURT: Are you moving this in yet or just
15 publishing it?

16 MS. JOHNSON: Publishing at this moment.

17 (Whereupon, the following video was recorded
18 to the best of the court reporter's ability as
19 follows as it was almost totally unintelligible:)

20 MS. MOBLEY: Hi, mom.

21 MS. WILLIAMS: (Unintelligible.)

22 MALE VOICE: I was just thinking as far as
23 (unintelligible.)

24 MS. WILLIAMS: It's okay. Oh, baby.

25 BY MS. JOHNSON:

1 Q Mrs. Williams, what's happening right here?

2 A I'm comforting her.

3 (Publishing video.)

4 MS. WILLIAMS: You know I love you so much.

5 It's okay.

6 MS. MOBLEY: Why do you have to leave?

7 MS. WILLIAMS: Because the --

8 (unintelligible.)

9 MS. MOBLEY: (Unintelligible.)

10 (Stopped video.)

11 (Resumed video.)

12 MS. WILLIAMS: (Unintelligible) and she's
13 going to ask me if she can come in the room and

14 (unintelligible) and I told her that

15 (unintelligible.)

16 I love you so much.

17 (Unintelligible.)

18 MALE VOICE: And like I told her what's
19 happening, you know, for her (unintelligible).

20 MS. WILLIAMS: I told her (unintelligible).

21 MS. MOBLEY: I don't want you to go. Tell me
22 what to do. (Unintelligible.)

23 THE COURT REPORTER: I can't hear anything.
24 I can't understand it.

25 MS. WILLIAMS: So I -- (unintelligible).

1 BY MS. JOHNSON:

2 Q And what's -- what's going on there,
3 Mrs. Williams?

4 A I'm talking to her. I'm talking to her. I'm
5 saying good-bye to her. I'm telling her to behave
6 herself and be respectful to her family.

7 (Publishing video.)

8 MS. WILLIAMS: (Unintelligible). I'm not
9 (unintelligible) and it's not about -- I can
10 (unintelligible) about me, it's about you, so.

11 You know, don't you worry about what
12 (unintelligible). Just worry about you and
13 (unintelligible). You may need counseling. You
14 might seem like you don't need it right but you
15 might.

16 MS. MOBLEY: I know what (unintelligible)
17 counseling and (unintelligible).

18 BY MS. JOHNSON:

19 Q And, Mrs. Williams, what are you guys talking
20 about there?

21 A If I remember correctly, about her getting
22 counseling.

23 Q And you said it's all about you?

24 A Yeah, it was all about her.

25 Q Were you -- what were you trying to convey to

1 her at that time?

2 A That I was concerned about her. I told her
3 don't worry about me. I was more concerned about her.
4 I just wanted her to be okay.

5 Q And the last clip.

6 (Publishing video.)

7 MS. MOBLEY: No one needs to
8 (unintelligible).

9 MS. WILLIAMS: Come on.

10 MS. MOBLEY: Come what (unintelligible).

11 How long (unintelligible.)

12 MRS. WILLIAMS: (Unintelligible.) I don't
13 know. It's okay.

14 MALE VOICE: I'm going to give her my card
15 too.

16 MS. WILLIAMS: Yes, sir.

17 Come on, Lexi, we got this now. Come on now.

18 MALE VOICE: I'll be right with you, Gloria,
19 okay?

20 MS. WILLIAMS: Go on. I'll be back, you
21 know, okay.

22 MS. MOBLEY: Okay. Good-bye. I'll see you.

23 Oh, gosh.

24 MS. WILLIAMS: Don't worry about it.

25 MS. MOBLEY: I love you, mom.

1 MALE VOICE: We'll take care of her.

2 MS. WILLIAMS: Okay.

3 (End of video.)

4 BY MS. JOHNSON:

5 Q Mrs. Williams, what were you trying to do for
6 Alexis at that time?

7 A I was trying to comfort her. I was trying to
8 reassure her that it was going to be okay.

9 Q And what happened as soon as she left that
10 room?

11 A I just broke down.

12 Q Mrs. Williams, did you ever tell Kamiyah
13 Alexis not to reach out to her parents after telling
14 her who she really was?

15 A No, I didn't.

16 Q And, in fact, when you knew they were coming
17 up to meet her for the first time, did you tell her to
18 give them a chance?

19 A Yes, I did.

20 Q Since your arrest, have you and Alexis
21 remained in touch?

22 A Yes, we have.

23 Q Has she ever asked you to stop speaking to
24 her?

25 A No, she hasn't.

1 Q In fact, when you don't call her for a few
2 days, what happens?

3 A She'll call my husband or call my mom and
4 ask, have you talked to mom, if so, tell her to call
5 me.

6 MS. JOHNSON: And, Your Honor, permission to
7 approach?

8 THE COURT: Certainly.

9 BY MS. JOHNSON:

10 Q Mrs. Williams, I'm showing you what's been
11 marked as Defense Exhibit 2. Can you look at those and
12 tell me what they are.

13 A They are letters from Alexis.

14 Q And are those sent while you've been
15 incarcerated?

16 A Yes, ma'am. That's her handwriting.

17 MS. JOHNSON: And, Your Honor, permission -- I
18 would ask to offer these into evidence as
19 Defendant's 2, and I do have copies for the Court
20 as well.

21 THE COURT: Any objection?

22 MR. MIZRAHI: No, Your Honor.

23 THE COURT: Defense Composite 2 is received
24 into evidence, and I've received courtesy copies.
25 Thank you.

1 (Whereupon, the documents last-above referred
2 to were received in evidence as Defendant's
3 Composite Exhibit No. 2.)

4 BY MS. JOHNSON:

5 Q And, Mrs. Williams, do those letters, I know
6 there is only two, several, but do those letters
7 represent the type of conversations that you and Alexis
8 have had over the 16 months?

9 A Yes, yes, it does.

10 Q Mrs. William, why did you not return Kamiyah
11 Mobley at any time to her biological parents after you
12 took her on January 10th, 1998?

13 A I think fear, you know, just crippling fear,
14 and then I fell in love with her. I fell in love with
15 her. I fought with myself for so many years thinking I
16 could just bring her back, bring her back, bring her
17 back, and I don't know, it would be something she do or
18 something she say and I just said, you know, I just --
19 I just have to nuture her and I just, I don't know. I
20 fought with myself for years with that question and try
21 to bring her back, especially when she was -- when I --
22 I guess when this -- when it first happened because I
23 guess I didn't know what state of mind I was in.

24 For the baby shower she had received two baby
25 bags, and I always kept it -- one of them packed full

1 with formula and Pampers and -- because I just knew
2 that they were coming to pick her up that week, because
3 I knew I wasn't going no -- you know, this is something
4 I never did, this was out of character and I was going
5 to get caught, I knew it, and I thought I was going to
6 get caught that week and for I guess maybe a good six
7 months that bag stayed in the hallway closet because I
8 knew somebody was going to knock on the door and say,
9 hey, we heard you got this baby, give her back. So I
10 wanted to make sure that she was going to be okay on
11 her way back to Florida.

12 Q And she would have diapers and formula?

13 A Yes.

14 Q Ultimately that day didn't come until she was
15 18?

16 A That's correct.

17 Q Since your arrest in January of 2017, have
18 you reached out to the Mobley or Aiken families?

19 A No.

20 Q And why is that?

21 A Because of the advice of my attorneys.

22 Q And you've now entered a plea to two charges,
23 the offense of kidnapping Kamiyah Mobley and
24 interference with child custody; is that correct?

25 A That is correct.

1 Q And in that plea you acknowledge that you
2 acted alone?

3 A Yes, I did.

4 Q And in that plea you acknowledge that the
5 Mobley family was not involved in any way?

6 A That is correct.

7 Q And that the Aiken family was not involved in
8 any way?

9 A That is correct.

10 Q And did you also agree to pay an amount
11 requested by the State for the cost of the Jacksonville
12 Sheriff's Office investigation in this case?

13 A Yes, I did.

14 Q Now that you've entered a plea and counsel is
15 no longer holding you back, do you have anything you
16 wish to express?

17 A Oh, God, yes.

18 Q I'll allow you to do that at this time.

19 A Ms. Mobley and Mr. Aiken, I wanted to
20 apologize to you when you were in South Carolina. I
21 pray every day, every day for the good Lord to renew
22 your hearts, renew your minds and to heal your heart
23 and to give you the peace and joy that comes with
24 knowing his words.

25 I don't -- I can't explain where I was back

1 then 20 years ago. I know I wronged you, and I'm so
2 sorry. So many days, so many days, so many days, so
3 many days I just wanted to pick that child up and say,
4 come on, let's get in this car and go. I just
5 couldn't. I couldn't. I never -- when I left
6 Jacksonville, I didn't look back. I didn't know what
7 you went through. I can only imagine what you went
8 through, I can only imagine, but I never in my life,
9 never in my life meant to hurt you, meant to hurt
10 either one of you. God knows I didn't. God knows my
11 heart, but I did hurt you, and for that I'm so sorry.

12 And I know I can't give you back the 18
13 years, I know that. If I could, I would. If I could
14 give you a new heart, Ms. Mobley, I would. If I could
15 give you a new heart, Mr. Aiken, I would, but I can't
16 do that. I don't have the power or the authority to do
17 it. I know you hate me right now, and I know you've
18 heard what people said about me, but I done something
19 wrong, and this is probably the only thing I've ever
20 done wrong, and I hope one day, I hope one day that you
21 can find it in your heart to forgive me for what I done
22 to you-all.

23 I don't -- don't know what more to say, but I
24 wanted -- I wanted to reach out to you before this,
25 because I know you was hurting and know you want

1 answers. You know, I just kind of prayed that you
2 would come down to the jailhouse to see me or whatever
3 and ask, because I would have told you, even though my
4 attorneys told me not to. I think if you had come that
5 far I would have had to tell you, but I am so sorry,
6 but I tell you I hurt you, I hurt Mr. Aiken and your
7 families, and for that I am deeply sorry. I'm so
8 sorry.

9 Q And, Mrs. Williams, did you acknowledge that
10 Kamiyah Mobley, Alexis, has been hurt through the
11 situation as well?

12 A Oh, yes, oh, yes.

13 I have something that I would like to share
14 with you-all, maybe at another later time, with
15 Ms. Mobley and Mr. Aiken, something I -- I put together
16 that I hope that maybe would one day give you some
17 comfort, and I, if you want it, I will give it to you.

18 Q And what is that, Mrs. Williams?

19 A Just something I put together for them, just
20 something. I really would rather not say with the
21 media.

22 Q Does it depict Kamiyah's life?

23 A Yes, it does.

24 Q And do you have any -- any -- through this,
25 do you acknowledge that your own family has been hurt

1 and harmed?

2 A Well, I'm not finished saying -- apologizing
3 to them. I'm sorry, I just, I don't know. I can't
4 explain where I was at that time in my life. It wasn't
5 a good place, and that's not your problem, it's not
6 your problem, but I can't explain how I felt or why I
7 did what I did. I just know that looking at you,
8 hearing about you, I hurt you in a major way, both of
9 you. Your life hasn't been the same, and for that I'm
10 sorry.

11 Now, as I said before, I put together this
12 thing for you, and I would like to share it with you if
13 you would accept it.

14 As for Kamiyah, as for Kamiyah, I never meant
15 to hurt you. I never meant to hurt you. I just love
16 that child so and I never meant to hurt you and never
17 to cause you any harm, any pain, any of that, and I'm
18 sorry, and I hope you can find it in your heart to
19 forgive me. I tried to love you the best way I could
20 and the only way I could. I tried to nurture you, but
21 nothing can take away what I took from you, nothing can
22 replace that. I will always love you, always. And the
23 joy that you brought me, I thank God the world can't
24 take it away from me, but you're not mine. Your mother
25 and father are sitting right here.

1 Q Mrs. Williams, do you acknowledge that your
2 own family has been harmed in this situation as well?

3 A Yes.

4 Q Due to your actions?

5 A Yes, I do.

6 Q And do you have anything that you wish to say
7 to them?

8 A Well, I thank God, I thank God, I thank God
9 that he loved me so much that he allowed me, allowed me
10 to have a family like you-all, because it's only him
11 that gave you-all to me. I'm so sorry I hurt you-all
12 as well. I'm so sorry that I brought this little girl
13 in your life, and for her to be taken away from you-all
14 as well too. I'm sorry for deceiving you-all. I hope
15 one day you-all can find it in your hearts to forgive
16 me for the pain I've put -- put on you, the
17 embarrassment. My mom, my dad, I love you guys so
18 much, and my husband, my children, my grands, my
19 sisters, my brothers, my nieces and nephews, and my
20 aunts and uncles and my church family and my friends, I
21 am so sorry.

22 Q And, Mrs. Williams, until you told Alexis
23 that she was Kamiyah Mobley, had you told anyone prior
24 to that?

25 A No. Well, no, no. That's why it was such a

1 shock to everybody. No, I kept this secret to myself.
2 Nobody knew, nobody. That was my secret. Nobody knew.

3 Q Having been incarcerated for the last 16
4 months, what -- what have you learned?

5 A Humility.

6 Q Have you tried to make the best of your
7 incarceration?

8 A Yes.

9 Q How so?

10 A I stay in my Word. I stay in the Word. Read
11 the Bible every day. I pray for the Mobley family, the
12 Aiken family, my family. I pray for the people at the
13 Jacksonville Detention Center, the girls in our dorm.

14 Q Have you started a Bible study?

15 A Yeah, we started a Bible study and, you know,
16 just try to make it a little easier in there.

17 Q Have you received any disciplinary reports
18 while there?

19 A No.

20 Q Now, at some point the Judge has the
21 opportunity to impose a sentence of anywhere from time
22 served up to 22 years. If you're able to reenter
23 society, what are your plans for the future?

24 A My life has changed, you know, my life has
25 changed. I know what Ms. Mobley is talking about. I

1 know what Mr. Aiken is talking about. I know their
2 pain. I know a little bit of their pain. The friends
3 you had or the people you know, you know, are not --
4 are not those people, you know. I can't go back to the
5 way things used to be.

6 Q Do you intend to return to South Carolina?

7 A Yes.

8 Q To Colleton County?

9 A Yes.

10 Q Are you hoping that your residence still
11 exists?

12 A If my husband will have me.

13 Q Would you like to finish your masters?

14 A I would, I would, but those things that --
15 that were -- that meant something to me before, they
16 really don't mean that much to me now, that's because I
17 was in corporate America. I just -- those are not
18 important to me now that I think about those things
19 really too much.

20 Q What are you thinking about?

21 A I'm thinking about helping others. I think
22 about helping young girls that have been in abusive
23 relationships not go down the same road that I've gone.
24 I've talked to a lot of the girls there and --

25 Q There where?

1 A At the jail. And my situation is no
2 different from a lot of them and, you know, some of
3 them are grateful to be alive. I'm grateful to be
4 alive. So, you know, but, you know, when your mindset
5 is -- when you're abused and going through violence,
6 you don't think about -- you don't know reason, you're
7 not right when you're going through abuse, you know.

8 And I realize abuse is in all different areas
9 in life. It doesn't matter if whether you're rich or
10 poor, you know, black or white, it doesn't matter. So
11 for you to try to hide it and not tell anybody instead
12 of getting help when you need it, I don't -- I didn't
13 do that. I kept thinking I could deal with this
14 myself. And so none of those things about management
15 and leadership, no. I think I'll change to a
16 different -- a different degree, maybe counseling or
17 something but, you know, being a convicted felon I'm
18 going to be limited. You know, I know I can't work for
19 the State and I know I can't work for federal. So, you
20 know, maybe a church ministry, I don't know, but I want
21 to help others.

22 Q And upon release, how can you ensure the
23 Court that you will remain a productive member of
24 society?

25 A I'm not that same person I was 20 years ago,

1 I'm not. I'm just not that same person and I don't --
2 I've tried to help the Lord and I've tried to live
3 right, I try to treat people right, except for that one
4 little thing I had that nobody knew about.

5 Q Do you now have a supportive husband?

6 A Yeah, I have a supportive husband.

7 Q Supportive church?

8 A Supportive church, supportive family and
9 supportive community. I mean, they love me, even
10 through my circumstances.

11 Q And is there anything else that you want to
12 the tell the Court this morning before the Judge
13 imposes sentence?

14 A Other than I'm sorry, I'm sorry for all of
15 this. I'm not a bad person. I did a wrong thing, I
16 did. If I could do it all over again, no, I wouldn't
17 do it. And I thank God for his grace and his mercy
18 because he's helped me through this. I just want to --
19 I just want to try to make it right if it's possible.
20 I just want to try to make it right.

21 MS. JOHNSON: Thank you, Mrs. Williams.

22 THE COURT: Thank you, Counsel.

23 Cross-examination?

24 MR. MIZRAHI: Your Honor, it's going to be
25 some time, and we've been going for a little while,

1 so.

2 THE COURT: Okay. So why don't we talk about
3 the schedule at sidebar briefly.

4 (Whereupon, a sidebar conference was had out
5 of the presence of the court reporter, after which
6 the proceedings were resumed as follows:)

7 THE COURT: Not quite yet, but just in a
8 moment we're about to have a ten minute break.

9 I believe, Ms. Johnson, was there something
10 you wanted to address?

11 MS. JOHNSON: Yes, Your Honor. I published
12 Defendant's Exhibit 3, but I would now offer it
13 into evidence.

14 THE COURT: Any objection?

15 MR. MIZRAHI: No, Your Honor.

16 THE COURT: Defendant's Exhibit 3 then is
17 received into evidence.

18 (Whereupon, the document last-above referred
19 to was received in evidence as Defendant's Exhibit
20 No. 3.)

21 THE COURT: It is currently 12:21 p.m., so
22 we'll be in recess for 10 minutes.

23 MS. JOHNSON: Yes, Your Honor.

24 THE COURT: Court is in recess.

25 (Whereupon, a short recess was had, after

1 which the proceedings were resumed as follows:)

2 (Defendant present.)

3 THE COURT: Good afternoon.

4 Please be seated if you wish.

5 Just for the record, all the attorneys are
6 here, Ms. Williams is here. She remains on the
7 witness stand. We'll pause for a moment and then
8 we'll proceed with cross-examination.

9 You may proceed, Counsel.

10 MR. MIZRAHI: May it please the Court.

11 THE COURT: Yes.

12 CROSS-EXAMINATION

13 BY MR. MIZRAHI:

14 Q You discussed on direct examination that you
15 wanted the truth to come out.

16 A Yes, sir.

17 Q The truth is from July 10th of 1998 until
18 July 10th of 2016 that for every second, every minute,
19 every hour, every day, every week and every year that
20 you were a kidnaper, that's the truth, correct?

21 A Yes, sir.

22 Q And the truth is that for as much as you
23 claim to have prayed to God to ease the pain of the
24 Mobleys and the Aikens, it was you, and only you, that
25 had the ability to ease that pain, correct?

1 A Yes, sir.

2 Q And the one little thing that you did was 18
3 years of torture on two innocent families, correct?

4 A That's correct, sir.

5 Q You had a good childhood, correct?

6 A Yes, sir.

7 Q There was nothing in your background that
8 would explain your behavior, correct?

9 A That's correct.

10 Q You were educated, correct?

11 A Yes, sir.

12 Q You were taken care of?

13 A Yes, sir.

14 Q You were loved?

15 A Yes, sir.

16 Q And you consciously made the decision to do
17 what you did in this case, correct?

18 A Consciously, no.

19 Q No one forced you, correct?

20 A You're right, correct.

21 Q You weren't under the influence of any drug
22 or alcohol, correct?

23 A That is correct.

24 Q Okay. You just say you weren't in your right
25 state, your right mind, right?

1 A That's -- that's correct, yes.

2 Q Okay. But you were taught the difference
3 between right and wrong, correct?

4 A That is correct.

5 Q And everything you did you knew was wrong,
6 correct?

7 A Yes.

8 Q You said that you're a kind person?

9 A Yes, I am.

10 Q Would you agree that for 18 years you were
11 not kind to everyone involved in this case?

12 A You're right, I wasn't.

13 Q Do you agree a person is defined by their
14 actions, not their words?

15 A That's correct. That's true.

16 Q So I want to talk a little bit about your
17 life leading up to your decision to abduct a newborn
18 baby. You decided that you wanted to be in a
19 relationship with Mr. Manigo, correct?

20 A Yes.

21 Q And that for all the abuse that you talked
22 about here on the stand and your family talked about,
23 you never called the police, correct?

24 A No, I didn't.

25 Q You never sought to leave Mr. Manigo,

1 correct?

2 A I did eventually.

3 Q I'm not talking about eventually. I'm
4 talking about at the time that you made the decision to
5 abduct Kamiyah Mobley.

6 A No, not at the time.

7 Q Okay. I understand you left him later.

8 A Yes.

9 Q Okay. And you called the police on him
10 later?

11 A No, I called the police on him at the time of
12 some of the incidents that happened.

13 Q Let me ask you this: When you got your
14 shoulder surgery, did you tell the truth to the doctors
15 that did the surgery?

16 A Yes, I did.

17 Q You told them that your boyfriend pulled your
18 arm out of your socket?

19 A I told them about years of fighting, yes.

20 Q Okay.

21 A But this was after the relationship was over
22 that I had surgery.

23 Q Okay. So it was years and years later?

24 A Yes.

25 Q Okay. But at the time that you drove down on

1 July 10th, he was in jail, right?

2 A Yes.

3 Q And he had been in jail for some period of
4 time, correct?

5 A Yes.

6 Q So you were essentially away from him?

7 A Yes.

8 Q Okay. He didn't have a hold on you at that
9 point, correct?

10 A He -- he didn't.

11 Q And your sons --

12 A But the damage had already been done by that
13 time.

14 Q Well, you're not blaming him for the decision
15 that you made, are you?

16 A No --

17 Q Okay.

18 A -- I'm not, no, I'm not.

19 Q So your son --

20 A I've forgiven Mr. Manigo for all the abuse.

21 Q Okay. So your sons, though, always spent the
22 summers with their father, right?

23 A Yes.

24 Q Okay. So the fact that they were gone for
25 the summer didn't really impact your decision to abduct

1 Kamiyah, correct?

2 A Well, at that time in '98 they were gone,
3 period.

4 Q Okay. And that was based on your behavior,
5 correct?

6 A That was based on the abusive relationship I
7 was in that their father interceded and got custody of
8 the kids.

9 Q Okay. So you chose Mr. Manigo over your
10 children?

11 A No, I did not.

12 Q Okay. Well, you chose to stay with him as
13 opposed to leaving him when he was abusive?

14 A I tried to bring peace, and I assumed,
15 because he apologized and he said he wasn't going to do
16 it again, then he would do it.

17 Q Okay. Now, you claim you were pregnant,
18 correct?

19 A I was.

20 Q And my understanding is that miscarriage
21 happened several months before July 10th of 1998,
22 correct?

23 A That's correct.

24 Q So you had had a significant amount of time
25 to get over that miscarriage, correct? In other words,

1 it didn't happen the day before, it didn't happen July
2 9th, correct?

3 A Well, I didn't know there were a time about
4 how you can mourn.

5 Q Well, the answer to my question is, yes, it
6 happened several months before, correct?

7 A Yes, it did.

8 Q Okay. Now, you were working two jobs but you
9 never went to a doctor, correct?

10 A I did go to a doctor. I had to pay to go
11 because I didn't have insurance.

12 Q But you never went to the doctor about the
13 miscarriage?

14 A No. They told me that it was just spotting,
15 so when I finally did go back to the doctor it was a
16 couple months later and that -- that's when they done
17 the ultrasound.

18 Q Okay. And that was several months before you
19 went to Jacksonville, correct?

20 A No, that was actually maybe a month before.

21 Q Okay. But the baby was long gone?

22 A That's correct.

23 Q The shower that you had, was that before the
24 ultrasound or after?

25 A It was before.

1 Q The car seat that you got as a result of that
2 shower, what did you do with it?

3 A It was in the car.

4 Q So you unwrapped it and put it in your car
5 even though you had no need for it?

6 A Well, no, this was before.

7 Q Before what?

8 A Before the ultrasound.

9 Q Well, I understand that.

10 A Okay.

11 Q And then after the ultrasound you still kept
12 the car seat in your car, correct?

13 A Yes, I did.

14 Q Okay. It was unwrapped in the backseat of
15 your car?

16 A Because it was placed in there earlier. I
17 just never took it out.

18 Q And so it sat in your car every single day
19 after you found out you had no baby, it stayed there,
20 you looked at it, correct?

21 A Yes, sir, along with the room and all the
22 other items that I received.

23 Q Sure.

24 And then on July 10th you made the decision
25 to turn south on I95, correct?

1 A Yes.

2 Q And you made the decision to wear hospital
3 scrubs, correct?

4 A I worked at a nursing home.

5 Q Okay. But you -- you made the decision to
6 keep wearing those hospital scrubs, correct?

7 A I didn't go home, so, yes, I didn't change.

8 Q Okay. Well, you drove all the way. How long
9 did it take, five hours?

10 A From Walterboro to Jacksonville, I think it
11 was two and a half.

12 Q Okay. You're driving fast?

13 A I don't remember.

14 Q Okay. Anyway, so you make a decision to
15 park, correct?

16 A Yes.

17 Q And you parked on the University Hospital
18 campus, correct?

19 A Yes.

20 Q And you made the decision to walk up to the
21 maternity ward, correct?

22 A Yes.

23 Q And you made the decision to go into a room
24 where a woman had given birth, correct?

25 A Yes.

1 Q And it was your decision to engage that woman
2 in conversation, correct?

3 A Yes, we talked.

4 Q And you at that moment misrepresented who you
5 were, correct?

6 A No. I told her my name, and I guess because
7 of the scrubs I think she assumed that I was a nurse.

8 Q Well, you know that, you know that she
9 assumed you were a nurse, correct?

10 A Right.

11 Q Okay. And you never corrected her and said,
12 no, I just lost my baby, I just want to talk to you
13 about your baby?

14 A No, I did not.

15 Q Okay. So she thinks you're a nurse, right?

16 A Uh-huh.

17 Q Yes?

18 A Yes.

19 Q And she's going about talking about the
20 caring of her child, right?

21 A No, actually she wasn't.

22 Q Now, you saw Kamiyah Mobley on the chest and
23 saw Ms. Mobley, Shanara Mobley holding Kamiyah,
24 correct?

25 A Yes.

1 Q And did you see the love in Shanara Mobley's
2 eyes when she was looking upon her child?

3 A I don't think I looked at her like that, to
4 be honest with you. I just, like I said before, my --
5 my thought pattern and my mindset was not thinking like
6 that. I saw her look at her baby, but at the time I
7 believe she was real groggy still, and I just don't
8 remember.

9 Q Did you see that smile on her face?

10 A Yes, I did.

11 Q And you're going through in your mind at that
12 point that you're going to take this child, aren't you?

13 A No.

14 Q Well, you said on direct examination that you
15 saw that she was young, correct?

16 A Yeah, I saw that.

17 Q Okay. And you actually said on your direct
18 examination you kind of just threw it out there and
19 went, oh, she was having -- she wasn't sure how she was
20 going to care for the kid or something like that. Do
21 you remember saying that?

22 A Yes.

23 Q Okay.

24 A That's what we talked about.

25 Q Okay. But that's not why you took her,

1 right, you didn't take her because Shanara was talking
2 to you about how she was going to care for Kamiyah,
3 right?

4 A No.

5 Q And we heard a lot of I don't knows, okay,
6 about why you did everything, you know, I counted 20 of
7 them, but regardless, you didn't -- you did come up
8 with an answer, and your answer was, I did it because I
9 wanted to bring peace to my family; is that true?

10 A Yes.

11 Q Okay. So when you made the conscious
12 decision to take this child, you did it for your own
13 selfish reasons, correct?

14 A Not thinking logically, yes.

15 Q I understand it wasn't a logical decision.
16 It was a selfish decision, correct?

17 A It wasn't a logical decision.

18 Q Okay. And it was a selfish one?

19 MS. JOHNSON: Your Honor, I think she's
20 answered that.

21 THE COURT: Overruled.

22 BY MR. MIZRAHI:

23 Q Go ahead.

24 A It wasn't a logical decision.

25 Q So you're not going to say it was a selfish

1 one?

2 A Yes, it was.

3 Q Okay.

4 A It was.

5 Q So you say, you testified that you weren't in
6 your right mind, right?

7 A That's correct.

8 Q But certainly you knew to get out of
9 Jacksonville and go back home, correct? In other
10 words, you didn't want to be caught on that day,
11 correct?

12 A I -- from what I remember, I wasn't running.

13 Q Okay.

14 A I was walking, and I believed at any given
15 time somebody would just grab my arm and say, hey, what
16 do you have in the bag.

17 Q Well, are you saying you put this child in a
18 bag; is that what you did?

19 A Uh-huh.

20 Q Yes?

21 A Yes.

22 Q Okay. I guess you really weren't concerned
23 about Kamiyah Mobley's welfare when you stuffed her
24 into a duffle bag, were you?

25 A She wasn't in a duffle bag.

1 Q In a purse. What was she in? What kind of
2 bag, you tell us.

3 A I don't remember.

4 Q Okay. But you weren't really concerned about
5 her welfare when you did that, were you?

6 A I was.

7 Q You were?

8 A Yes.

9 Q Because that's a good place to put a baby?
10 Did you carry your other children in bags?

11 A No, I haven't.

12 Q Okay. All right. So anyway, you get back
13 home. Did you put her in the car seat?

14 A Yes.

15 Q You get back home, and certainly by the time
16 you had gotten back to South Carolina you've realized
17 what you've done, right?

18 A Yes.

19 Q And you went to sleep that night, correct?

20 A Yes.

21 Q And it's just you and her, you and Kamiyah in
22 the home, correct?

23 A That's correct.

24 Q How long was it before you showed her to any
25 friends or family members?

1 A The next day or, no, it started the same day.

2 Q Okay. And did any one of your friends and
3 family ever wonder like where you were and where you
4 gave labor and how come they didn't visit you in the
5 hospital and -- anything like that?

6 A No.

7 Q No one had any questions?

8 A My parents did.

9 Q And what did you tell them?

10 A That I was there overnight because I wasn't
11 home.

12 Q Okay. I guess, you know, they knew that
13 Mr. Manigo was in jail, right?

14 A That's correct.

15 Q So did -- were they upset that you just gave
16 birth to their grandchild and no one was around?

17 A No.

18 Q Everyone thought that was normal?

19 A I mean, you can stay in the hospital one day
20 and if you don't have a fever you can go home.

21 Q I understand that, but in some respects you
22 figure a phone call would be made saying, hey, I've
23 given birth.

24 A I guess they're thinking like that, yes.

25 Q Well, didn't everyone know that you weren't

1 pregnant anymore?

2 A No, they didn't.

3 Q So then you begin the process of perfecting
4 your crime by getting fake births certificates and fake
5 Social Security cards and fake bassinet information
6 that you doctored up to show that Kamiyah Mobley was,
7 in fact, your child, correct?

8 A Yes.

9 Q And you would agree that any time during
10 Kamiyah Mobley's young childhood it would have been in
11 her best interest for you to turn her over to the
12 authorities, correct?

13 A Yes.

14 Q And you could have done that anonymously
15 without getting in any trouble, right?

16 A I guess.

17 Q I mean, in theory, you could have walked into
18 a hospital and dropped her off and walked out, right?

19 A I guess, yes.

20 Q And then, you know, maybe you would have
21 never been caught, but at least she would have been
22 found, right?

23 A Yes.

24 Q And certainly you knew that the entire city
25 of Jacksonville, frankly, the entire United States was

1 looking for Kamiyah Mobley, right?

2 A I didn't know that.

3 Q Well, you knew enough when Kamiyah Mobley --
4 you confessed to Kamiyah Mobley you knew enough to go
5 on an internet site and pull off a flyer, right?

6 A That's correct.

7 Q You knew that was out there, right, in other
8 words, that she was being looked for, correct?

9 A Yes.

10 Q You knew that. So you did know that people
11 were looking for her, correct?

12 A I said yes.

13 Q Okay. So, I mean, I understand the internet
14 didn't really exist right then as it does today.

15 A Right.

16 Q Okay. And even back then, in the year '99
17 and the year 2000, before Kamiyah Mobley would have had
18 any memories of your abduction, you certainly thought
19 about taking her back, correct?

20 A Yes.

21 Q You testified to that?

22 A Yes, I did.

23 Q And then you made the decision not to,
24 correct?

25 A Out of the fear.

1 Q Fear of getting caught?

2 A No, out of just fear.

3 Q Okay. Fear of losing her, right?

4 A Because I loved her.

5 Q Right. And that was a selfish love, correct?

6 A I wouldn't say it was selfish.

7 Q Okay. Do you think that any of your degrees
8 and good works in the community give any solace to the
9 Mobley or Aiken families?

10 A Of course not.

11 Q Do you think that your missing your
12 grandchildren gives any solace to the Mobley or Aiken
13 family?

14 A Of course not.

15 Q Do you acknowledge that this was the worse
16 decision you could have made for Kamiyah Mobley?

17 A Absolutely.

18 Q When you did confess to Kamiyah Mobley, that
19 was only because Kamiyah Mobley was confronting you
20 about not being able to have a Social Security card and
21 a birth certificate, correct?

22 A That's correct.

23 Q And had that not occurred, you might have
24 still kept the secret from her, correct?

25 A No.

1 Q Oh, you would have confessed eventually?

2 A Yes.

3 Q Okay. You just -- you were just biding your
4 time for 16 years?

5 A No.

6 Q Okay. But even after you confessed to her
7 you did not turn yourself in, correct?

8 A That's correct.

9 Q And you had to have known that her parents,
10 her real parents were still looking for her, correct?

11 A Correct.

12 Q And you made the decision to listen to a 16
13 year old who asked you not to turn yourself in,
14 correct?

15 A Yes.

16 Q And you listened to a 16 year old that for
17 the last 16 years you had brainwashed into thinking
18 that you were her mother, correct?

19 A I wouldn't use the word brainwashed.

20 Q Well, what word would you use?

21 A That's what she knew, that's all she knew.

22 Q Would you want to -- instead of brainwashing
23 would you want to say every waking moment of the day
24 you lied to her?

25 A The love wasn't a lie. True love is not a

1 lie.

2 Q When it's based on a falsehood it is.

3 A It's not.

4 Q When you heard her say mother for the first
5 time, you knew in your heart that that was a lie,
6 correct?

7 A Correct.

8 Q And you perpetrated that lie and you
9 promulgated that lie every waking moment of those 18
10 years, correct?

11 A Yes.

12 Q Okay. So instead of brainwashing you'd
13 rather use those words, lying every single waking
14 moment of every single day; is that better than
15 brainwashing?

16 A That's your words, sir.

17 Q Okay. If you were so concerned about Kamiyah
18 Mobley's welfare, why on earth did you not seek
19 counseling for her when you confessed to her that she
20 was not your child?

21 A I don't know why I didn't.

22 Q Yeah, you don't have a good answer for that,
23 do you?

24 Isn't the real answer because you really
25 didn't care about Kamiyah Mobley's welfare, because if

1 she started talking to counselors about the fact that
2 you stole her you'd be arrested?

3 A No.

4 Q It wasn't your welfare that you were
5 concerned about?

6 A No, it wasn't, because I was willing to turn
7 myself in.

8 Q But you listened to a child instead, yes?

9 A Yes.

10 Q Did you take joy, did you find it precious to
11 you in your heart and your soul the pictures that you
12 looked at and were introduced into evidence as
13 Defense's Composite 6? Are those memories precious to
14 you?

15 A Yes.

16 Q And do you acknowledge that you forever stole
17 those precious memories from the people that gave birth
18 to that child?

19 A Yes.

20 Q And you understand that you cannot turn back
21 the clock as to that, correct?

22 A I can't.

23 Q There is no mistake with which you can erase
24 that pain, correct?

25 A That's correct.

1 Q All right. You know, the world -- you said
2 that the world cannot take away the joy that you
3 experienced raising Kamiyah. Do you remember saying
4 that?

5 A Yes, I do.

6 Q But it was you, and only you, that took that
7 identical joy away from Shanara Mobley and Craig Aiken
8 and that family, correct?

9 A Yes.

10 Q And you took that joy away from Kamiyah
11 Mobley, true; isn't that true?

12 A Yes.

13 Q In other words, Kamiyah Mobley not being able
14 to look at her flesh and blood and having a sister and
15 a brother that had the same genes as she has, correct?

16 A That's correct.

17 Q Now, you agree that sorry doesn't cut it in
18 this case, right?

19 A Yes.

20 Q And that all the sorrys in the world can't
21 turn back time, right?

22 A That's correct.

23 Q And you acknowledge that you need to be
24 punished for this crime, right?

25 A That's correct.

1 Q So how much time do you think you should get?

2 A That's not my choice.

3 Q I know it's not your choice, it's not your
4 decision, it's up to Judge Aho.

5 A That's correct.

6 Q How much punishment do you think you deserve?

7 A I'm -- I'm not sure. I can't answer that.

8 Q Do you agree with what your father said, that
9 if you do the time -- you do the crime you better be
10 prepared to do the time?

11 A Yes.

12 Q And you are prepared to do that now?

13 A Whatever she decides.

14 Q And you would agree that any harm that
15 becomes your parents or your family or your grandkids
16 is as result of your decision and your decision only,
17 correct?

18 A That's correct.

19 MR. MIZRAHI: That's all the questions I have,
20 Your Honor.

21 THE COURT: Thank you, Counsel.

22 Any redirect?

23 MS. JOHNSON: Just briefly, Your Honor.

24 THE COURT: Very well.

25 REDIRECT EXAMINATION

1 BY MS. JOHNSON:

2 Q Mrs. Williams, you didn't choose to give up
3 your boys, did you?

4 A No, I did not.

5 Q However, that was a Court decision?

6 A That's correct.

7 Q However, you do agree that it was because of
8 your remaining in a relationship with Mr. Manigo?

9 A That's correct.

10 Q Why didn't you leave him in 1998?

11 A I guess I thought I could help him, and I
12 just felt like I just couldn't get away, and I don't
13 know if it was in my head or what, but I just, you
14 know, I just wanted to try to help him.

15 Q Is that why you want to help people in
16 similar situations now?

17 A Yeah.

18 Q And Mr. Mizrahi asked you why weren't you
19 over that miscarriage. There had been some time
20 between the miscarriage and July 10th, 1998, correct?

21 A That's correct.

22 Q However, did you acknowledge that you had
23 miscarried when you did?

24 A Yes.

25 Q Was your body still growing?

1 A Yes, my body was still growing.

2 Q And had you acknowledged the miscarriage at
3 the beginning when you did actually miscarriage?

4 A No, I didn't.

5 Q And, in fact, your family believed there was
6 a natural progression --

7 A Yes.

8 Q -- from the time you were pregnant until July
9 10th, 1998?

10 A Yes.

11 Q And in the video after your arrest when you
12 and Kamiyah are in the Sheriff's Office in Colleton
13 County you tell her, it's all about her?

14 A That's correct.

15 Q And you advised her about counseling?

16 A Uh-huh.

17 Q Mrs. Williams, you understand that Judge Aho
18 will be imposing the sentence?

19 A Yes, ma'am, I do.

20 Q And you acknowledge that what you did is
21 wrong?

22 A Yes, I do.

23 Q Did you love that girl with all your heart?

24 A With all of my heart.

25 Q Did you give her everything that you could?

1 A Everything, everything in my being.

2 Q Did you keep her educated?

3 A Yes, I did.

4 Q Kept her healthy?

5 A Yes, I did.

6 MS. JOHNSON: No further questions, Your
7 Honor.

8 THE COURT: Thank you, Counsel.

9 Any recross?

10 MR. MIZRAHI: No, Your Honor.

11 THE COURT: Very well.

12 Ms. Williams is welcome to step back to
13 counsel table if she would like to.

14 It's 1 o'clock. Why don't we take the lunch
15 break. Let's take an hour and 15 minutes and come
16 back at 2:15.

17 MR. MIZRAHI: Yes, Your Honor.

18 MS. JOHNSON: Yes, Your Honor.

19 THE COURT: We'll be in recess until 2:15.

20 Thank you.

21 (Whereupon, a lunch break was had, after
22 which the proceedings were resumed as follows:)

23 (Defendant present.)

24 THE COURT: Good afternoon.

25 Please be seated if you wish.

1 Let me speak with Madam Clerk briefly about a
2 matter on the calendar.

3 We're back on the record in the case of the
4 State versus Ms. Williams. All counsel are
5 present, Ms. Williams is present. We are here for
6 closing, but I just wanted to verify that all the
7 evidence is in for both sides; is that accurate?

8 MR. MIZRAHI: Correct, Your Honor.

9 MS. JOHNSON: Yes, Your Honor.

10 THE COURT: Very well.

11 You have no time restrictions, and I'm
12 carefully listening.

13 You may proceed, sir.

14 MR. MIZRAHI: May it please the Court.

15 THE COURT: Yes.

16 MR. MIZRAHI: Your Honor, we are here today
17 because of this defendant's callous disregard for
18 the law and her decision to inflict a lifetime of
19 pain upon an innocent family. And, you know, we
20 spent the last two days dealing with the emotions
21 surrounding this kidnapping and the pain that this
22 woman has inflicted, and I think it's critical for
23 Your Honor's analysis of what the proper thing to
24 do in this case is to examine, you know, what is
25 the purpose of sentencing and what do our laws that

1 we all agree to share, what do those law say about
2 sentencing and what Your Honor should consider in
3 deciding what is appropriate.

4 So I want to go over what the primary purpose
5 of sentencing is, and our Florida Criminal
6 Punishment Code tells us very clearly that the
7 primary purpose of sentencing is to punish the
8 offender, and I would suggest to Your Honor that
9 that should be your prime focus in deciding what to
10 do in this particular case, it should be
11 punishment, and that is what I think Your Honor
12 needs to focus on the most.

13 I want to go through a few others. Of course
14 Your Honor should also be cognizant of what your
15 sentence will do in terms of protecting the public.
16 Your Honor should be cognizant of what your
17 sentence will do to publicly renounce crime, to
18 make it a deterrence, to make sure that the
19 citizens of our community understand that certain
20 behavior cannot be tolerated. I do think that is a
21 primary purpose of sentencing, to make the victims
22 whole, to make the victims understand that justice
23 and the justice system is there to work for them to
24 make sure that they are whole as a result of the
25 sentence.

1 And finally, rehabilitation. And as our
2 criminal punishment codes indicates, Your Honor,
3 rehabilitation is secondary. It is a secondary
4 goal and is subordinate to the goal, the primary
5 goal of punishment. And these factors I think are
6 what the Court should consider in determining what
7 an appropriate sentence is.

8 THE COURT: And if I could get you to pause
9 for a moment. I want to verify the defense can see
10 the State's Power Point.

11 MR. LUFRANO: We can, Your Honor.

12 Thank you.

13 THE COURT: Thank you so much.

14 MR. MIZRAHI: Thank you, Your Honor.

15 THE COURT: You may proceed, sir.

16 MR. MIZRAHI: Thank you, Your Honor.

17 I want to talk a little bit about the
18 sentencing guidelines. You know, we've -- you've
19 heard not a lot in the score about what the maximum
20 is, the defendant should receive the maximum for
21 this. Well, as the Court is well aware, kidnapping
22 carries with it a punishment of up to life in
23 prison. Now, the -- so that's the maximum. So the
24 concept of 22 years is not -- is the maximum is
25 actually false.

1 Twenty-two years was a negotiated disposition
2 reached into by the parties based primarily on the
3 fact that the sentencing guidelines were in place
4 at the time of this crime, and because the
5 defendant committed this crime three months before
6 the criminal punishment code was passed, the
7 defendant gets the benefit of those sentencing
8 guidelines that were in place in July of 1998.
9 Those sentencing guideline called for a sentence of
10 50.7 months to 84.5 months.

11 Again, the 84.5 months was not the maximum,
12 the statutory maximum was life in prison, but
13 because the defendant was willing to take
14 responsibility and accountability for her actions
15 by pleading and forgo the need of a trial and the
16 defendant was willing to waive the upper end of
17 these guidelines to go all the way up to 22 years,
18 the State felt it was in the best interest of the
19 State of Florida, as well as the victims, to
20 entertain that plea that we entered into it, but
21 those guidelines, Your Honor, existed had the
22 defendant returned the victim an hour later, a day
23 later, a week later, a month later, a year later.
24 The guidelines would have been 50.7 months to 84.5
25 months. They don't change because kidnapping is an

1 ongoing crime, but the fact that it's ongoing, the
2 Court should consider the harm and the length that
3 that -- this particular kidnapping was in
4 considering whether 84.5 months is appropriate
5 and/or all the way up to 22 years.

6 Your Honor, for argument's sake, we can
7 assume that if you would have 16 separate counts of
8 kidnapping, in other words, if the State were able
9 legally, which it cannot, but if the State were
10 legally able to charge 16 counts of kidnapping for
11 every year that the defendant was interfering with
12 the rightful mother's custody of this child, the
13 guidelines would be 46.4 years to life. I show
14 this not because those are what the guidelines are,
15 but I show that because I think it's very
16 instructive to the Court about what the sentencing
17 guidelines feel the harm that this defendant
18 inflicted upon this family and how severe this
19 kidnapping was because it occurred such a long
20 period of time, and I think it's very instructive
21 to the Court to think how we, as a society, would
22 feel about 16 separate one year counts of
23 kidnapping, and that's what our society would say
24 about the potential sentence.

25 THE COURT: And I understand your argument is

1 by analogy, but there was only one count of
2 kidnapping brought?

3 MR. MIZRAHI: Right.

4 THE COURT: And only one legally could be
5 brought?

6 MR. MIZRAHI: Right.

7 THE COURT: Okay.

8 MR. MIZRAHI: But, as I indicated, the count
9 of kidnapping would have been the exact same had
10 she returned the child the next day, the next
11 month, the next year. So it's certainly I think
12 instructive for the Court to see what the
13 guidelines would be had the State been able to
14 charge 16 separate counts.

15 Also, Your Honor, I think it's important
16 because there -- every crime is not created equal,
17 and that is why our -- you know, we have agreed to
18 a sentencing structure that allows Courts to
19 consider, and juries to consider, how crimes are
20 different, and those are based on aggravating
21 factors and mitigating factors, and I want to
22 examine some of the aggravating factors that the
23 State submits exist in this case and then examine
24 the lack of mitigating factors that exist in this
25 case.

1 As the Court is aware, one of the egregious
2 aggravating factors is that the crime was committed
3 in a cold, calculated and premeditated manner, and
4 the fact that a crime is done like that, our Courts
5 and our legal system says that that crime can
6 actually be punishable by death if it's a homicide,
7 and it is still an aggravator for the Courts to
8 consider, and this crime was about as heightened
9 premeditation, about as cold, about as calculated
10 as any kidnapping could ever be.

11 This woman drove from her town, mind you,
12 having lost, allegedly, a baby months earlier. She
13 drove through the state of South Carolina, the
14 state of Georgia, all the way down to Florida.
15 okay, just so happened to find a hospital right off
16 of the road, parked that car, went directly to the
17 maternity ward, finds herself a teenage mother,
18 engaged that mother for not seconds, she didn't run
19 in there and grab the baby and run out, she engaged
20 this woman for hours trying to deceive her and then
21 later her grandmother -- her mother-in-law, the
22 child's grandmother, so she could abduct this
23 child.

24 She brought with her a car seat in the back
25 of that car that sat there. That went into the

1 cold, calculated, premeditated nature of the crime.
2 She wore scrubs, evidence of the cold, calculated,
3 premeditated nature of the crime.

4 She brought a bag into that hospital room and
5 actually placed that child in the bag, knowing full
6 well that she was doing something illegal, evidence
7 of the cold, calculated and premeditated nature.
8 The fact that she could have cared less for the
9 well-being of the child and cared only for her
10 getting away with this crime, stuffing a newborn
11 infant in a bag.

12 That cold, calculated and premeditated action
13 continued when she drove home and showed off her
14 brand new baby. All the smiles, all the joy, all
15 of the attention on her. That shows you the
16 character of this woman, not the words that
17 everyone said about what a good person she was, but
18 her actions show you her character, show you what
19 her soul is.

20 It goes beyond that, Your Honor, faking birth
21 certificates. I think the Court -- if the Court
22 can see the Power Point up there, Your Honor.

23 THE COURT: I do.

24 MR. MIZRAHI: This was seized from the
25 defendant's home by police officers, a forged birth

1 certificate indicating that she is the birth mother
2 of Alexis Manigo, all made up, completely forged, a
3 fake Social Security card, again seized from the
4 defendant's house, with photographs that it's just
5 so chilling to see how long this crime happened
6 when you have a photograph of a fake Social
7 Security card -- Social Security card along with,
8 you know, a four or five year old Kamiyah Mobley
9 and then graduating Kamiyah Mobley how cold, how
10 calculated and how premeditated this crime was.

11 This defendant actually took the little
12 bassinet identity cards that are placed in the
13 hospital cribs, the little bassinets, and you
14 can -- the Court can see that this was also seized
15 from her house. She actually forged it to show
16 that Gloria is the mother and Manigo is the baby.
17 She kept this as a momentum of her crime, not out
18 of remorse. You keep these kind of things out of
19 pride. She was happy with what she had done.
20 Cold, calculated and premeditated, and it continued
21 for 18 years.

22 The crime was heinous, atrocious and cruel to
23 the victim and her parent -- family and the cane --
24 pain continued for 18 years. Now, the State's not
25 in any way, shape or form suggesting that while

1 Alexis Manigo believed that her family was her
2 family that pain was inflicted upon her, but
3 certainly pain has been inflicted upon her
4 unknowingly, because every childhood memory this
5 poor child has experienced was based on a crime,
6 was based on fraud, was based on brainwashing, was
7 based on a lie, and obviously the Court saw what
8 this family had to endure, what this family had to
9 experience and the heinous, atrocious and cruel
10 nature of this crime, and it continues today.

11 Shanara Mobley and Craig Aiken find out after
12 18 years, really beyond hope, the fact that they
13 maintained hope that long I think is incredible,
14 I'm not so sure I could have done that, but they
15 did, they maintained hope that one day they would
16 see their child again, and when that moment comes
17 and they're so thrilled and so happy, but what they
18 can't prepare themselves for is the person
19 responsible for all their pain has tricked, lied
20 and brainwashed their child into believing that
21 she's a good person, into believing that she's a
22 mother, and the pain continues today every time
23 that Kamiyah Mobley reaches out to her family.
24 It's not her fault, I'm not blaming her, she was
25 tricked into this, but every time that Kamiyah

1 Mobley reaches out to the people that raised her
2 it's another dagger in the heart of this family
3 knowing that the people responsible are still
4 closer to Kamiyah Mobley than her biological
5 parents are. So the heinous, atrocious --

6 THE COURT: You said people responsible.

7 MR. MIZRAHI: I'm sorry, what, Your Honor?

8 THE COURT: You said people responsible.

9 MR. MIZRAHI: No, I'm saying, well, the people
10 that the child still loves are responsible for the
11 daggers not really of their doing, but the
12 defendant's doing, but if the relationship
13 continues with grandparents, the uncles and the
14 cousins and all that stuff, I think each of those
15 relationships is another dagger in the heart of the
16 biological parents because the person responsible
17 is the one that she still maintains a relationship
18 with.

19 You know, these are photographs apparently at
20 her baby shower and then just six weeks after
21 bringing Kamiyah Mobley home, and you can see the
22 joy on her face in both of those, and all the while
23 this joy is going on it shows Shanara Mobley's
24 anguish. The fact that you have a mother and a
25 father and a grandmother and aunts and uncles and

1 cousins all anguishing under the heinous, atrocious
2 and cruel nature. And don't for a second think
3 that this defendant didn't realize that. She was a
4 mother well before all this happened and she knew
5 the pain that she was inflicting upon another
6 family. She just didn't care and that, Your Honor,
7 is heinous, atrocious and cruel.

8 I can't even begin to imagine what this
9 photograph with a fake name does to Shanara Mobley
10 and Craig Aiken and the rest of that family,
11 because every parent thinks about the graduation of
12 their child and that was robbed from them by her.
13 Eighteen years of heinous, atrocious and cruel
14 conduct by this defendant.

15 The defendant knowingly created harm to an
16 entire community. Your Honor, my first son was
17 born just three months after, two and a half months
18 after this crime. I know that it completely
19 changed the way the hospitals in Northeast Florida,
20 perhaps throughout the state and the country,
21 treated maternity wards, and I know that the whole
22 community was devastated with the concept that we
23 can live in a society where someone, and that
24 someone turned out to be high functioning, not
25 crazy, not under the influence of some delusion,

1 not uneducated, but a seemingly normal person can
2 walk into a hospital room and steal somebody's
3 baby, and I would submit there was not a mother or
4 father that for the days, months, weeks, years
5 after this incident that knew about this incident
6 it wasn't in the back of their minds wondering
7 whether or not this was going to happen to them.
8 This was not an isolated crime that had little
9 affect upon our community. It was a devastating
10 crime that had an affect upon our entire community,
11 and it had a devastating affect upon her family.

12 Now she's trying to say sorry now, and I'm
13 sure they forgive her because they love her but,
14 Your Honor, it's very disturbing when -- when you
15 see 76 year old parents that need her and yet she
16 didn't think about them at all for 18 years and
17 then tries to use their frailty as a reason why she
18 shouldn't go to prison. That's her responsibility
19 and she can't -- she wants to use it now when she
20 didn't think about that for 18 years, about the
21 harm she was doing to her family and her parents
22 were going to need her one day, and she knew it
23 through her own testimony, she was going to get
24 caught one day, she didn't care.

25 This was a selfish act by a selfish woman

1 that destroyed an entire community, including her
2 own family, including the poor innocent child that
3 we all -- we all recognize the difficulty that
4 she's going through and, frankly, I think she's
5 going to be fine. My interactions with Kamiyah are
6 she's a strong woman and probably doesn't like all
7 the sympathy she receives but, you know, she
8 shouldn't be spending this part of her life
9 worrying about this stuff. Right now she should be
10 thinking about her summer break, not sitting in the
11 courtroom wondering where she fits in in this whole
12 process.

13 The defendant's actions caused the
14 Jacksonville Sheriff's Office and the Florida
15 Federal Bureau of Investigation countless hours
16 that could have been used to solve and prevent --
17 prevent other crimes. We have a finite amount of
18 resources, Your Honor. As Detective McKean
19 testified to, a tremendous amount of resources was
20 spent on this case that could have been spent to
21 solve other crimes or prevent other crimes or put
22 people away that needed to put -- needed to be put
23 away so other families wouldn't be crying.

24 You know, the resources, I mentioned a couple
25 of times during Detective McKean's testimony that

1 this was homicide, because this was a missing baby
2 and it was such an important case, the Jacksonville
3 Sheriff's Office put their best investigative teams
4 on it. It wasn't missing persons, it was homicide.
5 And so what does homicide do, take people that kill
6 and bring them up to justice, get them off the
7 streets. Well, instead of doing that, they're
8 searching for her, because of her own selfishness.
9 And obviously we can't quantify if one murder could
10 have been solved but, Your Honor, I submit that
11 goes to the aggravating part of this defendant's
12 acts that not only did she do this to a community
13 as a whole and to this family, but she distracted
14 law enforcement.

15 A \$250,000 reward, Kamiyah Mobley, everyone
16 is looking for her, and there is Kamiyah Mobley's
17 photograph on the refrigerator in the defendant's
18 house. It's amazing how strikingly similar they
19 are. She knew what she was doing.

20 The victim was less than 12 years of age, and
21 of course that is a strong aggravating factor when
22 the Court hears about sex crimes against children,
23 homicides against children, child abuse, aggravated
24 child abuse against children, the fact that a child
25 is so vulnerable. In this case I want Your Honor

1 to think about the fact that this defendant knew
2 that she was creating -- she was reaching a point
3 of no return once this child became four or five
4 years old, because she was creating a bond between
5 a mother and daughter that can never be undone, and
6 she continued to inflict.

7 Had she returned Kamiyah Mobley within the
8 first year, I would submit Kamiyah Mobley wouldn't
9 have known the difference, that's probably through
10 two years, three years, maybe four years, but it
11 reached a point where Kamiyah Mobley would have
12 known the difference, would have remembered the
13 fact that she was kidnapped. So you're talking
14 about knowingly inflicting a kidnapping upon a
15 child five, six, seven, eight, nine, ten, eleven
16 and then twelve years old, inflicting, knowingly
17 inflicting this brainwashing, this lie, this fraud
18 upon this child, knowing that she's not only
19 destroyed the life of a parent, but she's
20 contributing to an undefined harm on this child.

21 Your Honor, I can't even begin to wrap my
22 brain around the following two photos. We found
23 those in the defendant's house, and the defendant
24 went through the process of obtaining an
25 identification, an Ident-A-Kid, of Kamiyah Mobley,

1 just five years after she took Kamiyah Mobley, got
2 the fingerprint on the back of that card and kept
3 that card with instructions about what to do if
4 someone takes your kid. If that is not
5 aggravating, if that doesn't make this crime worthy
6 of the highest possible punishment, I don't know
7 what else could.

8 We spent the last two days here listening to
9 memories, precious photographs, precious moments
10 that this defendant had and her family had with
11 Kamiyah Mobley. You know, it's the little ones, I
12 think it was Kamiyah Mobley's brother, her
13 fraudulently obtained brother because it's not a
14 biological brother, that he had these memories of
15 Skittles, and I forget what the exact story is, but
16 these little precious moments that he'll always
17 remember with his sister.

18 And they all came in here and said wonderful
19 things about the defendant, but I wondered if
20 Kamiyah Mobley had committed some crime and she was
21 on trial or she had pled guilty to some crime and
22 we were to bring her biological parents in to say a
23 few nice words or share a few memories of what kind
24 of person that Kamiyah Mobley was, I'm afraid that
25 they would be speechless because they don't have

1 the Skittles memory, they don't have any of those
2 memories, and that's what was forever robbed from
3 them. This crime could not be any more
4 aggravating.

5 Well, let's consider some mental factors,
6 some mitigating factors things that the Court may
7 consider in determining that maybe she doesn't
8 deserve as much time as the State is asking for.
9 Did the defendant have some mental condition?

10 I mean, she tried to say that on the witness
11 stand, but she didn't know and she wasn't in the
12 right state of mind, but that condition that she
13 claimed that she wasn't in her right state of mind
14 had zero affect on every other aspect of her life.
15 There is no way, I submit to Your Honor, you can
16 consider that as any kind of mitigating factor.
17 She was working. She got degrees. She volunteered
18 at church, and over and over again. If you took
19 out the kidnapping, she sounds like she's the woman
20 of the year. So I submit to you that you cannot
21 consider any kind of mental mitigation in this case
22 because, first of all, none has been proven to you
23 and, second of all, it cannot be a mental condition
24 when she succeeds in every other part of her life.

25 Of course, the other argument that she gave

1 the stolen child a good childhood, there is nothing
2 that makes me more upset than this argument, the
3 fact that she did right by this child, that somehow
4 that is a mitigating factor.

5 Your Honor, the most important gift we give
6 our children is not presents at Christmas, candy at
7 Halloween, dresses on their birthday. That's not a
8 parent's job. A parent's job, the gift that is
9 most important that we give a child is a moral
10 soul. It's to teach our children that you should
11 do unto others as you would have them do unto you.
12 You do that through your words and you do that
13 through your example, more importantly through your
14 example.

15 So to claim, to have the gall to claim that
16 this woman did right by this child is disgusting,
17 it's infuriating and it's wrong, it's wrong,
18 because she didn't do right by this child. She
19 destroyed the concept of trust, the concept of
20 security. Parents are gods to their children, and
21 Kamiyah finds out that her god is a liar.

22 What about the genetic connection? What
23 about a sister? What about a brother that shares
24 the same smile, the same eyes, the same hair, the
25 same run and the same laugh, things that siblings

1 should be able to share with each other stolen from
2 her. It's not mitigating that she gave her a good
3 childhood. She could not give her a childhood
4 because it was all based on a lie.

5 Also, I expect you to think that Kamiyah
6 doesn't want -- want time, and God bless that child
7 for that feeling, because you know what, it's my
8 hope and feeling and the State of Florida has no
9 quarrel with Kamiyah Mobley's feelings. I don't
10 know how she can feel any other way, but to say
11 that somehow mitigates, Your Honor's decision, a
12 kidnapping should not benefit by her own
13 brainwashing into convincing this child that she is
14 a good mother, she shouldn't benefit by that, and
15 she should not benefit by Kamiyah's strength in
16 recognizing that this is a hard time for her entire
17 family, not just her mother. She shouldn't benefit
18 from Kamiyah Mobley's strength.

19 The kidnapper was a good person. You know,
20 saying that this woman is a good person is like
21 saying that Mussolini was a good leader because he
22 got the trains to the station on time and you
23 ignore the giant grand canyon of a crime that this
24 woman did. You can't be a good person and kidnap a
25 baby. Those are incongruent. That cannot be a

1 mitigating factor. She is not a good person. Her
2 act is the definition of evil. There is nothing
3 about what you've heard the last two days that in
4 any way, shape or form mitigates this case.

5 When you analyze the five purposes of
6 sentencing, Your Honor, I suggest to you that all
7 five of those points to giving this defendant 22
8 years in Florida State Prison. Mind you, this is a
9 legal argument, 22, 22 years in Florida State
10 Prison which, mind you, was already reduced from
11 life in prison. To give this defendant any less,
12 Your Honor, I submit to you is not following what
13 the purpose of the sentencing is, because giving
14 less than 22 years is saying, well, maybe stealing
15 babies out of hospitals is not such a bad thing.
16 Well, she did cry on the witness stand and she
17 seemed to go to church sometimes, so maybe I
18 shouldn't punish her as much as I should punish
19 her, but I think if Your Honor is true to what the
20 spirit of our Florida state statutes and the
21 sentencing structure that we have are, 22 years is
22 the only logical, unemotional and just sentence you
23 can impose in this case, but if Your Honor wants
24 some emotion, to be in your children's memories
25 tomorrow you need to be in their lives today.

1 Robbed, stolen, kidnapped by this defendant.

2 In the end of the day -- at the end of the
3 day, all that matters is love and memories, so make
4 sure you give it and make sure you make them. This
5 is why our lives are important. I think every
6 human being in the world would trade any monetary
7 gain for just one moment with their child, a hug, a
8 smile to brighten their lives, because that's
9 really what matters in life.

10 This is Shanara Mobley's beautiful family. I
11 love the steps from youngest to oldest, but that
12 photograph has a missing person, Your Honor, that
13 missing person is the person that should be in that
14 photograph and should be right between Shanara
15 Mobley and what she had raised for this whole time
16 as her oldest daughter.

17 When they're sitting around celebrating
18 grandpa's birthday, Kamiyah Mobley should have been
19 standing right there. When the kids are sitting
20 around the Christmas tree opening up presents,
21 wondering what Santa brought them, Kamiyah Mobley
22 should have been right there, and when the kids got
23 dressed for Halloween, Kamiyah Mobley should have
24 been dressed up right next to them. Those family
25 photos always have a missing picture.

1 And that photograph was taken not too long
2 ago, Your Honor. As you can see, Kamiyah Mobley is
3 in it, and it's just a perfect example of what that
4 family missed, what Kamiyah Mobley missed, what
5 Shanara Mobley missed, what Craig Aiken missed, is
6 a complete family for 18 years, it's priceless,
7 it's beyond comprehension what this defendant
8 stole. Benjamin Franklin said lost time is never
9 found again.

10 Your Honor, there is no way you can replace
11 what this defendant stole. However, your sentence
12 can define what our society feels about what this
13 defendant did. We are asking you to impose the 22
14 years in Florida State Prison, which is the maximum
15 of the plea negotiation.

16 Thank you.

17 THE COURT: Thank you, Mr. Mizrahi.

18 I'll hear from you, Counsel.

19 MR. LUFRANO: Thank you, Your Honor.

20 THE COURT: And everyone will have plenty of
21 time to place anything you wish to place on the
22 record, so rebuttal can be submitted from both
23 sides. I want to hear everything you want to say.

24 MR. LUFRANO: May it please the Court.

25 Counsel.

1 MR. MIZRAHI: Yes, sir.

2 MR. LUFRANO: Your Honor, this Court has
3 listened carefully and attentively to the last two
4 days, and throughout these proceedings the Court
5 has heard some truly unbelievable testimony. The
6 concept of imposing, crafting any sanction on a
7 case like this is a daunting task, but the defense
8 hopes that this argument will help Her Honor in
9 achieving that and in crafting the best possible
10 sentence.

11 Obviously this is a case where emotions run
12 high. The Court has heard not only about the pain
13 and the anguish from the Aiken and Mobley families,
14 the Court has also heard about the absolutely
15 wonderful and amazing woman so many people know
16 Gloria Williams to be, and perhaps most importantly
17 the Court has heard about the amazing and wonderful
18 woman that young Kamiyah Mobley has become.

19 That said, Your Honor, it's the defense's
20 perspective, and we would pause it, that in this
21 case after looking at the totality of the
22 circumstances, after weighing all of the mitigators
23 and all of the aggravators, that those mitigators
24 far outweigh the aggravators in this case and, as
25 such, it is the defense's contention that a

1 sentence of well below the maximum, much closer to
2 the guideline range, would be very reasonable and
3 appropriate in this case.

4 So without wasting too much more of the
5 Court's time, we want to start addressing some of
6 those factors the defense believes to be so
7 mitigating, beginning with the fact the defendant
8 would offer that Ms. Williams has demonstrated to
9 this Court not only through her own actions, but
10 also the testimony and the evidence that's been
11 presented, that she certainly can lead a crime free
12 and productive life, and we'd start, Your Honor, by
13 addressing the fact that at 52 years old
14 Ms. Williams has no prior criminal convictions.
15 During the 475 days she's been in the custody of
16 the Jacksonville Sheriff's Office she has not
17 received a single DR, disciplinary report. Both of
18 these are important facts that speak directly to
19 the conclusion that Ms. Williams can, indeed, abide
20 by the nature and letter of the law.

21 Beyond that, while I anticipate the State
22 will likely get up and say that this was an ongoing
23 offense, that every day that Ms. Mobley was missing
24 that another -- essentially this offense was
25 ongoing; however, there was uncontroverted

1 testimony that Ms. Williams was around countless
2 children, countless kids, nothing like this ever
3 happened again or ever happened since. And so we
4 would certainly argue that this is, indeed, an
5 aberration.

6 As such, Your Honor, in looking even beyond
7 that, Ms. Williams took steps to ensure that she
8 would be able to be a productive member of our
9 society. She got an education, she obtained her
10 GED, and she worked two jobs at times, one job at
11 others. She was able to support herself, and not
12 only herself, but the three kids she was raising;
13 Andre, Antoine and Kamiyah.

14 This is significant, Your Honor, because,
15 obviously, any parent and anyone who is going to be
16 productive needs to be able not only to support
17 themselves but those that they are entrusted to
18 care for, and Ms. Williams' ability to do that
19 prior to this case and prior to continuing her
20 education is certainly significant. She has gone
21 on and increased her ability to be gainfully
22 employed with the addition of several degrees,
23 including an associate's degree, a bachelor's
24 degree, and she was obviously in the process of
25 obtaining her master's degree at the time when she

1 was ultimately arrested.

2 The Court heard that Ms. Williams does,
3 indeed, intend to continue her education, it may
4 shift in a different direction, but she understands
5 that education is the key to being able to provide,
6 and her actions speak directly to the fact that she
7 does not seek or plan to be a drain on society.
8 She continues to be able to desire to be
9 productive. And so we think all of those things
10 and her ability to remain crime free is something
11 that the Court can feel comfortable with and would
12 argue is certainly mitigating.

13 That said, Your Honor, the defense would
14 humbly and would respectfully disagree with some of
15 the assertions of opposing counsel, specifically
16 that it's impossible for someone to be a good
17 person if they've committed a single crime or a
18 crime like this. I think the testimony that came
19 forward, Your Honor, indicated that Ms. Williams
20 has helped countless people in a number of
21 different ways, and her impact on the community in
22 Ruffin, South Carolina is a significantly
23 mitigating factor in this case. While it doesn't
24 necessarily have anything to do with whether or not
25 Ms. Williams committed some offense, that is not

1 the contention or not in question, but the actions
2 that Ms. Williams took through each and every stage
3 of her life and the actions she took volunteering,
4 and we'll walk through each of these, are indeed
5 mitigating and they should be considered.

6 We anticipate that as the Court will
7 ultimately consider all of the factors pursuant to
8 the Banks' case from the Florida Supreme Court the
9 Court will look at the totality of the defendant,
10 Ms. Williams' life, and the Court will review all
11 the mitigating and aggravating factors.

12 Ms. Williams --

13 THE COURT: Let me just ask you a quick
14 question to both sides. I understand the Florida
15 Supreme Court case of Banks versus State from 1999,
16 but this case the sentencing range is time served
17 up to 22 years, in other words, there would be no
18 downward departure analysis for any sentence --

19 MR. LUFRANO: Correct.

20 THE COURT: -- below the guidelines. I don't
21 know what the sentence will be, but I just want
22 that clear on the record.

23 MR. MIZRAHI: Yes, Your Honor.

24 MR. LUFRANO: Yes.

25 THE COURT: For us, there is no analysis?

1 MR. MIZRAHI: Correct.

2 MR. LUFRANO: Yes.

3 And we would agree there is certainly no
4 analysis, and we will, obviously, address the
5 guidelines a little -- a little further on.

6 THE COURT: So you're arguing things by
7 analogy in terms of the Court considering the
8 totality of the circumstances and the aggravating
9 and mitigating factors?

10 MR. LUFRANO: That is correct, Your Honor,
11 and it's just ultimately something we anticipate
12 the Court will review, not because the Court
13 necessarily needs to in order to determine whether
14 or not there is not a deviation, but simply because
15 it's part of the -- just a solid analysis for how
16 to consider what would be an appropriate sentence.

17 THE COURT: The thought process and the proper
18 analysis to be conducted by the Court under Florida
19 law?

20 MR. LUFRANO: Certainly.

21 And so, for that reason, Your Honor, the
22 defense does point that out. Specifically the
23 Court heard that Ms. Williams is actively involved
24 in her congregation, the Buckhead United Methodist
25 congregation, specifically she's not only an avid

1 attendee, but she's an active, active member. She
2 is a member of the Parish Pastor Relations
3 Committee, essentially one of the people who is in
4 charge of ensuring that the congregation remains
5 intact, ensuring that the pastor that they chose to
6 essentially facilitate all of the people within the
7 congregation is the person that they need and
8 someone who can help maintain that congregation.
9 That's an incredibly important role, and it was one
10 that Ms. Williams took on on a voluntary basis.

11 Beyond that, the Court also heard that
12 Ms. Williams is a member of the United Methodist
13 Auxiliary group that provides volunteer and
14 ministry work throughout Ruffin, South Carolina,
15 which is incredibly significant. The Court heard,
16 additionally, Ms. Williams participated in -- as a
17 chair of their congregation's youth services, and
18 in addition to doing that on a volunteer basis for
19 three years she also on two occasions attended a
20 children's summit, the Harambee summit, where
21 essentially children were allowed to come to the
22 church in sort of an idea where they could express
23 themselves, engage with one another, and they kind
24 of got the understanding that the church was, in
25 fact, a safe place, a place for everybody. They

1 sang, they danced and it was an experience that the
2 Court heard from Pastor White that the kids really
3 enjoyed having Ms. Williams and they certainly
4 asked her to come back again.

5 Beyond that, Ms. Williams also assisted with
6 youth services throughout the church congregation
7 and was just active in every aspect of the
8 congregation's life. The Court heard that the
9 congregation does certainly miss her, and we don't
10 say that to say that the Court can't impose a
11 sentence because people will miss her, but simply
12 to speak to the fact that Ms. Williams genuinely
13 was an important part of the lives of the
14 congregation and her works were, in fact, good, and
15 we think that's incredibly mitigating and should
16 certainly be considered in this case.

17 Beyond that, the Court also heard that
18 Ms. Williams' works were not dedicated solely to
19 her church, but she was also involved in a number
20 of other volunteer organizations, including the
21 Tuskegee Airmen, which assisted with not only
22 providing scholarship opportunities for high school
23 students going onto college, but also the Order of
24 Eastern Stars.

25 The Court further heard that Ms. Williams was

1 also active in the local PTA and PTO organizations
2 dealing with parent teacher relations, and again
3 trying to ensure that not only her children and the
4 children she was raising but other kids had, you
5 know, a good and safe environment to be educated
6 in. And again, the defense would argue that this
7 is incredibly important. In some of the letters
8 that the Court read there were some comments that
9 Ms. Williams never missed a parent teacher or, you
10 know, parent school function event, and again, the
11 defense would argue that that's certainly
12 significant. We would argue that it is mitigating.

13 Again, a number of these factors don't
14 necessarily undue or change the actions that
15 Ms. Williams took, but they are still significant
16 and should be considered.

17 Now, just as important and just as
18 significant is the impact that Ms. Williams had on
19 others and others in the community. I think it's
20 also important and significant to consider the
21 impact of her achievements as a parent. And while
22 opposing counsel posited that the most important
23 role that a parent can give is to provide a moral
24 soul, the defense would respectfully disagree. It
25 would be the defense's contention that the most

1 important job that any parent can give or has in
2 raising their child is to teach them and provide
3 them with the skills in order to be self-sufficient
4 in order to take care of themselves one day.

5 It would be the defense's contention that
6 while Ms. Williams may not have come into
7 possession of Kamiyah Mobley through any lawful
8 means or any, you know, essentially acceptable
9 means, that in that measure not only towards
10 Kamiyah Mobley but towards all of her children
11 Ms. Williams has succeeded.

12 The Court heard that at age 16 Kamiyah was
13 already looking for a job. That work ethic, that
14 need to be able to get out into the world and
15 actually achieve was something that she had
16 instilled not only in Andre Bolden and Antoine
17 Bolden, both of whom are gainfully employed today
18 and are now caring and earning for their own
19 children, but was also one that was instilled in
20 Kamiyah Mobley, and we believe that that's
21 certainly a mitigating factor in this case.

22 The defense would argue that the fact that
23 Ms. Mobley was raised well, that she was raised in
24 a loving environment is certainly mitigating. It
25 doesn't change the fact that, again, a kidnapping

1 and an interference in child custody occurred, but
2 it is certainly vastly different from so many other
3 kidnapping scenarios where children are taken into
4 whether it be sexual slavery, abuse or anything of
5 the sort, and so to say that this is the most
6 heinous or horrendous is simply not true.

7 Beyond that, Your Honor, there are a whole
8 host of other aspects when it comes to parenting
9 that Ms. Williams has done a phenomenal job of.
10 Ms. Williams stressed to all of her children and
11 all of the children she raised that education is
12 incredibly important. As such, the Court heard
13 that at just 17 years of age Kamiyah graduated from
14 high school, at no point was she ever not enrolled
15 in school, and she continued on and graduated. And
16 hopefully when everyone looks at that diploma,
17 whether it in the Mobley family, the Aiken family
18 or the Williams family or Bolden family, everybody
19 feels pride for Kamiyah, because they should. It's
20 an incredible achievement and it's important.

21 Beyond that, the Court heard that Kamiyah
22 does plan to attend college and that's wonderful
23 too, but the instilling the importance of
24 education, Ms. Williams did not only by words but
25 also by deeds. The Court heard that Ms. Williams

1 continued to go to school while she was raising
2 these children, and her efforts and her striving to
3 do that again led by example. Again, that's not to
4 say that every parent is perfect, but it is
5 important and we believe it's significant.

6 Beyond that, Your Honor, perhaps one of the
7 other really great aspects of Ms. Williams as a
8 parent was that she was able to make sure that all
9 three of the children she raised 28 truly loved,
10 and that's not to say that they just 28 good or
11 that they're here because they have some sort of
12 emotional attachment but, candidly, Your Honor, I
13 think the Court could hear it, which the Court
14 heard the testimony of Andre and Antoine Bolden,
15 how strongly they care about their mom, how much
16 she played a role in their lives.

17 Additionally, the Court also saw some of
18 those letters and interviews that Kamiyah gave.
19 She talked about how she was so loved, how she had
20 the best life, and we believe those things are
21 incredibly significant. We believe they are
22 mitigating. It doesn't undo what happened, but it
23 is certainly important to consider. So many people
24 could have done or made other decisions, could have
25 raised children that were not loved, were not cared

1 for, were not showered with affection and
2 admiration, but that wasn't what Ms. Williams did
3 in this case and it's certainly something that
4 should be recognized.

5 Now, we've talked a little bit thus far about
6 Ms. Williams as a parent, and I do think while
7 opposing counsel may disagree, it is important to
8 consider Kamiyah's wishes, and the reason for that
9 is twofold; one, specifically because at least as
10 to the kidnapping, which is the more significant of
11 the offenses for which Ms. Williams is charged, she
12 is the named victim, and so we believe that
13 certainly her wishes should be considered but, two,
14 besides Ms. Williams herself, the sentence that is
15 ultimately imposed is likely to have the biggest
16 effect on Ms. Mobley, and so for that reason we do
17 think it's important. We certainly understand the
18 State's argument that to allow someone who is
19 brainwashed to benefit from that could seem
20 strange, but at the end of the day, as much as the
21 sentence that is imposed on Ms. Williams is
22 important, it's just as important to consider how
23 this may affect or will affect Kamiyah Mobley,
24 through no fault of her own and is in a very
25 precarious position.

1 In that, Your Honor, the Court read a number
2 of articles and Ms. Mobley did make a number of
3 statements to the media speaking about her wishes.
4 The Court also read the PSI in which Ms. Mobley
5 indicated she certainly didn't want Ms. Williams to
6 get a lot of time. In some statements Ms. Mobley
7 stated she wanted Ms. Williams to receive less than
8 ten years or not a very long period of time. She
9 wanted the Court to be lenient. In another she
10 said don't lock her up and throw away the key. She
11 loved me for 18 years, cared about me for 18 years,
12 she made one mistake, but I was loved and, beyond
13 that, you know, she stated that she was given the
14 best life. And as recently as January of this
15 year, 2018, Ms. Mobley stated that she's certain
16 that she's going to get time, but I'm hoping not
17 very, very long. I think she should be lenient.
18 They took care of me very well. So the defense
19 would certainly put those forward because we
20 believe they do matter and should be considered by
21 the Court in crafting a reasonable sentence in this
22 case.

23 Now, beyond that, Your Honor, another concept
24 that we anticipate the Court is going to
25 contemplate and, candidly, should contemplate is

1 whether or not Ms. Williams poses any danger to the
2 community or any danger to the public. It is one
3 of the concepts that the sentencing analysis would
4 generally ask and require the Court to consider,
5 and it would be the defense's contention that, at
6 least in this case, the Court can rest easy and
7 does not need to worry that Ms. Williams continues
8 to pose a danger to the community. The defense
9 believes this for a number of reasons, but one of
10 the most significant is the fact that Ms. Williams
11 is not the same woman who took Kamiyah Mobley back
12 in 1998, twenty years have passed since that time,
13 and Ms. Williams has not only changed as a person,
14 but her situation in this has changed.

15 The Court heard a great deal of testimony
16 about just how tumultuous Ms. Williams' life was
17 prior to the taking. That testimony is not meant
18 as an excuse and it certainly does not excuse her
19 conduct, but it is important in providing a context
20 and providing the fact that just how confused, how
21 out of it Ms. Williams really was. At the time she
22 had been in an abusive relationship, one that she
23 was having a very a difficult time leaving, she had
24 lost custody of her two stones and she had lost a
25 child, abused, broken and battered, and in that

1 state Ms. Williams made a mistake. She hasn't
2 stated that she did anything else or she hasn't
3 stated that she hasn't violated the law. She
4 clearly did. She's not saying that this is a
5 result of some sort of mental condition, but in
6 that state of confusion, in that state of absolute
7 chaos she did this, and we believe that's important
8 because it's a state that Ms. Williams had or was
9 in.

10 Today, as things stand, Ms. Williams has a
11 loving husband. The Court got to hear from
12 Wernoskie Williams. The Court got to hear about
13 how now Ms. Williams' relationship with her parents
14 is no longer strained. She's active in their lives
15 and they're active in her's. The Court has heard
16 that she has phenomenal relationships not only with
17 her two sons, but also with the community as a
18 whole in Ruffin, South Carolina. All of those
19 things speak to the fact that Ms. Williams now has
20 an incredibly strong support system and one that
21 she simply did not when she made and when she
22 committed this offense. And so, again, the defense
23 believes that this speaks directly to the fact that
24 she is not likely to ever repeat the conduct that
25 occurred in this case.

1 Beyond that, the defense would again harken
2 back to an argument that was presented a little bit
3 earlier, which is that, quite simply, Ms. Williams
4 has had every opportunity and has been around
5 children through the various organizations she is
6 in through her volunteering. If Ms. Williams was
7 ever going to likely to or inclined to repeat this
8 behavior, over the last 20 years she would have had
9 every opportunity to do so, and she hasn't, and the
10 defense believes that speaks again to the fact this
11 was clearly an aberration. This was not
12 necessarily who she was. It's simply something
13 that spiraled got out of control, got too big.

14 And, yes, candidly, would it have been better
15 if she had returned Kamiyah? Ms. Williams
16 testified, yes, it would have. It would have been
17 much better. She was incredibly honest and open.
18 She had to admit things that were bad, that
19 essentially this was a selfish act. She doesn't
20 deny it, but it doesn't change the fact that she no
21 longer poses that same danger that she did at the
22 time at this taking.

23 Further, Your Honor, Ms. Williams is 52 years
24 old. She's not looking to raise additional kids.
25 She's hoping in the time that she has left that she

1 can help others, and the Court heard about her
2 plans to hopefully once whatever sentence is
3 imposed expires have the ability to do that but,
4 again, it would be the defense's contention that
5 Ms. Williams does not pose a danger to the
6 community and it's a reason the Court would not
7 need to impose some sort of lengthy incarcerative
8 sentence in Ms. Williams' case.

9 Now, the Court heard a little bit about the
10 fact that Ms. Williams did accept responsibility,
11 and it would be the defense's contention that
12 Ms. Williams certainly has accepted responsibility
13 in this case. She's certainly waived her
14 constitutional rights to a trial, to have this
15 contested. She's spared not only the Mobley and
16 Aiken family, but also Kamiyah Mobley of any kind
17 of lengthy and arduous trial. The defense would
18 argue that that is again significantly mitigating.

19 While, yes, it is true that the parties
20 reached an agreement regarding what the agreed upon
21 range would be, it doesn't take away from the fact
22 that that's still a mitigating factor and something
23 the Court can and should consider in crafting the
24 sentence, because it's not a decision that
25 Ms. Williams had to make. And obviously had she

1 chosen to do otherwise, many of the parties that
2 were involved or did speak would likely have been
3 subjected to lengthy depositions that would have
4 been invasive, and she certainly made choices to
5 spare those people from having to go through that.

6 Beyond that, Your Honor, Ms. Williams again
7 took responsibility for her actions and made sure
8 that she publicly stated that the Mobleys and
9 Aikens had absolutely nothing to do with this
10 offense. Having not made any statements prior to
11 the Court, it would have been very easy for
12 Ms. Williams to have concocted some sort of
13 carefully laid out scenario or scheme saying or
14 blaming, but Ms. Williams was open and honest and
15 she stated, and she wants to clear, the Aikens and
16 the Mobleys of any alleged taint or any allegation
17 that they were in any way involved. The defense
18 would also argue that this is significant and
19 mitigating. Obviously it can't undue the pain and
20 the harassment that they've undergone, but the fact
21 that she took those steps is certainly significant
22 and should not be overlooked.

23 Beyond that, Your Honor, while the Court did
24 hear that until today Ms. Williams did not
25 apologize to the Aikens and to the Mobleys, if

1 there was an animosity about that, the defense
2 would humbly ask that that be laid at the feet of
3 myself and my co-counsel. Obviously, prior to
4 today would not have been appropriate for any
5 defendant to make such a statement.

6 Now, a little bit earlier the Court heard the
7 State talking about the guidelines and about making
8 some arguments regarding analogies had this been 16
9 different 1 year kidnappings, and the defense would
10 like to discuss the guidelines with the Court
11 because, again, even though they are in no way
12 binding in this case, we do feel like they are
13 instructive as a guide to the Court.

14 And the defense would agree that the purpose
15 of the sentencing code and the purpose of the
16 sentencing code in place, even at the time when
17 these guidelines were in effect, was still
18 punishment. It says so right there in the law
19 921.001 -- 0016. That said, Your Honor, the
20 defense would take a very different tactic and we
21 argue that the drafters of those guidelines also
22 understood that knowing punishment was the goal
23 crafted it so kidnapping and interference with
24 child custody only scored out to a guideline
25 sentence of 67.6 months, and under the guideline at

1 bar or in play in Ms. Williams' case or would have
2 been had they not been waived, that would have been
3 the guideline score, as such, that guideline score
4 is presumed to be the appropriate sentence for an
5 offender under that guideline scheme. Having said
6 that, the Court would then be allowed to vary or
7 offer a variance of up to or below 25 percent, in
8 either direction, which would have been 50.7 months
9 up to the 84.5 months. Obviously, the Court could
10 have gone above or below that if the Court found
11 significant mitigating or aggravating factors,
12 similar to a downward departure as exists now with
13 the current CPC. The defense would point this out
14 because we believe the fact that Ms. Williams only
15 scores 67.6 months under the guidelines, even
16 knowing that sentencing is the -- well, punishment
17 is the primary goal of sentencing is still
18 significant, because that same guideline system
19 established the idea that this is the presumptively
20 appropriate sentence.

21 Obviously, this is a serious offense.
22 Obviously, there was a great deal of time that went
23 by before Ms. Mobley was ultimately found and
24 located but, again, Ms. Mobley was found happy,
25 healthy, educated, and that's incredibly

1 significant in this case.

2 Now, the Court did hear from both the Mobley
3 family and the Aiken family about the pain and the
4 anguish that this has caused and neither
5 Ms. Williams nor defense counsel can go back in
6 time, can make them feel better, can undue or take
7 away any of that pain. We're certainly sympathetic
8 to them. Having said that, Your Honor, the
9 imposition of a sentence is not going to change
10 that pain. It's not going to take it away. It's
11 not going to change what ultimately happens.
12 Everybody who is in this courtroom who is waiting
13 on the Court to ultimately impose a sentence, and
14 we realize it won't be today, is going to have to
15 move forward in their own way, but the defense
16 would argue that the sentence that the Court will
17 impose and -- shouldn't be based on feelings simply
18 of anger, but should be more crafted based upon a
19 consideration of all of the factors, all of the
20 parties, and then should be one that is
21 appropriate, not designed merely to send a message,
22 and we know the Court is not intending to do such,
23 but one that is essentially crafted and specified
24 specifically for Ms. Williams based on the offense
25 at bar, the mitigation and the aggravation.

1 Now, in this case the Court has heard a few
2 requests, none from Ms. Mobley, Kamiyah Mobley, but
3 one from Shanara asking for no contact or no
4 contact to be allowed. The defense would simply
5 argue that, obviously, Kamiyah Mobley is an adult,
6 she's over 18 or 18. I don't think there is any
7 need for the Court to impose such a sanction,
8 especially since it seems that Ms. Mobley would
9 have the ability to decide who she wants to have
10 contact with and who she doesn't.

11 Beyond that, Your Honor, while the defense
12 understands one of the arguments that opposing
13 counsel made that essentially this offense created
14 a significant amount of panic or fear within the
15 general community of Jacksonville, defense would
16 actually take that argument and would flip it on
17 its head. While a great bit of suffering and pain
18 may have come from this offense, the reality is
19 there was also some good that came from it, and
20 that is that maternity wards all over the country
21 have taken a vastly different tact towards securing
22 and, as such, offenses like this are exceedingly
23 rare, and that's not in any way to justify what's
24 happened, but is simply a statement of what has
25 happened and it's something where society as a

1 whole has benefited and it's certainly something
2 that should be considered or at least comparable.

3 Now, we did talk to the Court a little bit
4 about the guidelines at play and, candidly, cases
5 like this do not come along very often. As such,
6 the defense does believe it may be also instructive
7 for the Court to consider one or two other cases
8 that have some similar factual elements to them.

9 The Court heard a little bit earlier
10 obviously that this is a case where Ms. Mobley was
11 taken at a young age and then raised for many
12 years. There was a somewhat similar federal case,
13 the State, sorry, the United States versus Ann
14 Pettaway. It was a federal case. In that case
15 Ms. Pettaway similarly removed a child from a
16 hospital, the child was 19 days old and was
17 actually receiving medical care at the time and the
18 child was not ultimately located until the child
19 was 23. Ultimately, in that case the State, or I
20 keep saying the State because I'm used to the
21 State, the federal government and the defense
22 reached a sentencing range of 10 to 12 and a half
23 years and Ms. Pettaway was ultimately sentenced to
24 12 years by that Court.

25 Having said that, there were some stark and

1 marketed differences between Ms. Pettaway and
2 Ms. Williams that the defense believes are
3 noteworthy. Specifically, Your Honor, in
4 Ms. Pettaway's case she actually removed the child
5 that she ultimately abducted from potentially
6 lifesaving support. She actually removed the child
7 from an IV, which was certainly, we would argue, is
8 exacerbating and significantly different from
9 Ms. Williams' actions in this case. Ms. Pettaway
10 was an active recreational drug user during the
11 time she was raising this child and the child
12 Ms. Pettaway ultimately abducted and raised was in
13 her care and custody for 23 years before she was
14 ultimately located. All of these factors and
15 certainly, at least from the defense's perspective,
16 are specifically more aggravating than those for
17 Ms. Williams and, as such, the ultimate sentence
18 she received of 12 years the defense would argue
19 that a sentence below that and more similar to
20 either something less than the ultimate guideline
21 range of the 85.4 months would certainly be
22 appropriate in this case.

23 There was another case that we would also
24 direct the Court's attention to, and while it
25 has -- has some significant differences, we believe

1 it is certainly important, and it's the case of I
2 believe it is Warren Watson.

3 THE COURT: Do you have cites on these out of
4 state cases?

5 MR. LUFRANO: I can provide the Court with
6 that.

7 THE COURT: That will be fine.

8 MR. LUFRANO: It will take me a moment.

9 The other case actually it's in state court,
10 it was actually one I think that came in this
11 division, and I apologize, it was the State of
12 Florida versus William Watson. It was a case where
13 an individual, Mr. Watson, was owed money, he was
14 not paid and so he actually abducted a child of the
15 person who owed him money in the hopes of getting
16 that money returned. When it wasn't returned, he
17 ultimately left the two year old child on the side
18 of the road. Thankfully the child was found, and
19 obviously the child was missing for a far less
20 amount of time than was the case of Kamiyah Mobley.
21 However, the defense would argue that significantly
22 more exacerbating is the child in that case was put
23 in significantly more danger and risk of harm than
24 Kamiyah Mobley ever was. In that case it resolved
25 for a negotiated disposition of nine years in the

1 Florida State Prison.

2 The defendant, again, cites to both these
3 cases signifying and for the proposition that a
4 sentence of 84.5 months would certainly -- or less
5 would certainly be reasonable in this case, given
6 the fact that Ms. Mobley -- Ms. Williams never took
7 any action to in any way harm or endanger Kamiyah
8 Mobley, and we think that's certainly significant.

9 Now, the State did make a few assertions that
10 the defense does want to take a few moments to
11 counter or at least address. One was the fact or
12 the statement that certainly actions speak louder
13 than words and, obviously, the defense would agree.
14 And while some of the actions that Ms. Williams
15 take -- took may not be the actions that are
16 recognized or acceptable under the law, a vast
17 number of the actions that Ms. Williams did take
18 and that other people testified that she took are
19 significantly positive and should not be
20 overlooked. And so while we would agree that
21 obviously actions speak louder than words, it does
22 depend upon what actions you look at, and that the
23 vast majority of Ms. Williams' actions in her
24 entire life are positive and certainly speak to the
25 fact that she is of good character.

1 Now, there was also some mention and cites
2 about the fact that essentially this case cost the
3 Jacksonville Sheriff' Office a significant amount
4 of money, they invested significant, significant
5 resources in trying to locate Ms. Mobley, and we do
6 not disagree with the fact that they obviously
7 expended such efforts or incurred such expenses.
8 Having said that, Your Honor, the defense would
9 also argue that the decision to expend or put those
10 resources towards that would have been a decision
11 made by the Jacksonville Sheriff's Office, not
12 necessarily one made by Ms. Williams.
13 Additionally, the State in reaching this agreement
14 only asked for \$500. Obviously, had there been a
15 need for additional funds the State could have
16 asked for that.

17 THE COURT: With respect to that \$500, at the
18 appropriate time for imposition of sentence would
19 the State be able to bring an order on that \$500
20 cost of investigation, just so it can be documented
21 at that time?

22 MR. MIZRAHI: Yes, Your Honor.

23 MS. JOHNSON: And, Your Honor, it is part of
24 the plea agreement on the blue form.

25 THE COURT: Yes, it is, and it was discussed

1 on the record.

2 Thank you.

3 MR. LUFRANO: Obviously the Court has heard a
4 great deal of argument from both sides. It's the
5 defense's contention that ultimately the totality
6 of the circumstances, all of the actions in
7 Ms. Williams' life, the positive aspects of it, the
8 wishes not only of a number of family members but
9 also of Ms. Williams herself, of Kamiyah Mobley,
10 that a mitigated sentence is certainly one that the
11 Court should strongly consider.

12 We haven't addressed it too much, but I think
13 it is important before stepping down, there were a
14 few statements that weren't brought out during the
15 direct examination but did come out through some of
16 the articles, statements that were made by
17 Mr. Aiken, specifically he made statements to the
18 effect that he was more mad at the hospital than he
19 was with Ms. Williams because there was no way that
20 somebody should have gotten in that position where
21 this could have occurred.

22 Additionally, he also made a statement
23 essentially saying that he couldn't really judge
24 anyone because of the wonderful way that Kamiyah
25 turned out, and I believe the exact statement was,

1 I'm proud of the way she turned out. She did that.
2 That's why I can't criticize anybody. She was
3 given every chance to make it in life, and that's
4 all I can hope for for all my kids.

5 While obviously there is nothing normal or
6 nothing average about this scenario, Ms. Williams
7 has taken every action she can to mitigate and to
8 try to make the best out of a situation that simply
9 got away from her and, as such, the defense is
10 humbly asking that the Court impose a sentence of
11 no more than the maximum of what the guidelines
12 would have been, which would be the 84.5 months in
13 the Florida State Prison or lower.

14 That said, we'd like to thank the Court for
15 obviously its time and obviously the Court is not
16 bound by those guidelines, but we would be asking
17 for a sentence of no more than that.

18 THE COURT: I appreciate all of that
19 information and all the information provided by the
20 State. I have some questions for both sides.

21 Does either side have anything you want to
22 place on the record regarding the recommendation
23 made by the Florida Department of Corrections
24 within the presentence investigation report? I'm
25 not asking you to say anything about it. I'm

1 asking if you want to say anything about it. It's
2 certainly a different number than both sides have
3 proposed.

4 MR. MIZRAHI: Correct. I disagree with it and
5 I think that 22 years is appropriate, and that's
6 all I have to say about it.

7 MS. LUFRANO: Your Honor, I -- again, defense
8 would disagree with it. We would have some
9 different reasons. Obviously, we think it's more
10 time than is necessarily necessary. We would also
11 say that I don't believe in this case probation
12 would be necessary. Obviously, Ms. Williams is
13 looking to ultimately return to South Carolina. I
14 don't think that there is necessarily a need for
15 the State of Florida to expend additional resources
16 to monitor Ms. Williams and, additionally, given
17 the support system that exists and given the lack
18 of any other criminality, without any kind of
19 substance abuse history, any kind of significant
20 mental health history, there is really no need for
21 a period of probation to be imposed, that doesn't
22 mean the Court couldn't, but I don't think it would
23 be necessary.

24 I also believe, and I can double check this,
25 but the ultimate period of probation and

1 incarceration that was recommended exceeded the 22
2 year cap, so that's another issue and another point
3 that I think both sides would take with the
4 recommendation so, ultimately, I certainly
5 understand the recommendation, but we would ask the
6 Court not to rely on it.

7 THE COURT: It's just information.

8 MR. MIZRAHI: I agree with the probation
9 comment, Your Honor. I don't think that's
10 necessary.

11 THE COURT: Very well.

12 And the -- we all know what the
13 recommendation was, it hasn't been placed on the
14 record, but it did involve a term of incarceration
15 followed by a term of probation that was
16 recommended by the Department of Correction,
17 correct?

18 MR. MIZRAHI: Yes.

19 THE COURT: Yes.

20 MR. LUFRANO: And the only other thing we
21 would mention, Your Honor, obviously, we didn't --
22 we reserved comment for the probationer report,
23 just in terms of recommendation.

24 THE COURT: Absolutely.

25 MR. LUFRANO: And so that was another reason

1 why we would ask the Court to not necessarily rely
2 on that.

3 THE COURT: Very well.

4 Ms. Williams made a presentence investigation
5 report and then I decided I wanted it to be more,
6 and I addressed it on the record.

7 MR. LUFRANO: Certainly.

8 THE COURT: Okay. I have a question for you,
9 Mr. Lufrano. The State has argued that this was a
10 continuing crime, that it's not just the act of
11 actually taking the baby, it's the ongoing period
12 of time, year by year by year of the family being
13 deprived of the baby. Do you -- what is your
14 position about whether it was ongoing?

15 MR. LUFRANO: Your Honor, I believe we
16 actually have a different opinion, both myself and
17 the State. It would be the defense's position that
18 kidnapping is not an ongoing offense. Inference
19 with child custody, which is only a sentence for
20 which the max is five years, would be an ongoing
21 offense. And so while the kidnapping would not be,
22 and I think that there is case law and I know
23 Mr. Mizrahi and Ms. Johnson and I disagree on this
24 point, but I think kidnapping is a finite event.
25 Interference of child custody would be an ongoing

1 offense, and so --

2 THE COURT: There has to be case law that
3 would guide us on this issue in terms of
4 kidnapping. Your position, sir, is it's an ongoing
5 offense?

6 MR. MIZRAHI: Absolutely. In fact, the
7 defense pled to an information that placed the
8 dates of the crime from July 1st of 2000 -- July
9 10th of 2000 -- of 1998 until July 10th of 2016.
10 So, I, you know, I don't -- I think that in terms
11 of whether it is an ongoing or not an ongoing
12 crime, Your Honor, is really not -- does not have a
13 legal basis here since the defendant pled and we've
14 agreed upon the sentencing range. I do think it is
15 ongoing because I think the confinement was ongoing
16 and based on fraud, and so she was confining this
17 child for this period of 18 years with the purpose
18 of interfering with the parents' custody, so I
19 believe it is ongoing.

20 THE COURT: For the record, I have in front of
21 me the amended information, and it does show on
22 count one that the dates are between July 10, 1998
23 and July 9, 2016.

24 MR. LUFRANO: And we're not disagreeing with
25 what the information would state, Your Honor.

1 THE COURT: Very well.

2 I have a question for you, Mr. Mizrahi. This
3 is not the only time, I understand that, where the
4 State has a case where the victims do not
5 necessarily agree on the recommendations in terms
6 of sentence, and so my question to you is, in this
7 case, as I understand it, the biological parents of
8 Ms. Mobley are both requesting the maximum sentence
9 of 22 years, but Ms. Kamiyah Mobley is requesting
10 something below that.

11 MR. MIZRAHI: That's my understanding, Your
12 Honor.

13 THE COURT: Okay. Is there anything else,
14 Mr. Lufrano?

15 MR. LUFRANO: Nothing further at this time,
16 Your Honor. Obviously, if the Court would like any
17 specific case cites regarding the ongoing nature of
18 kidnapping, we would be happy to provide that to
19 the Court.

20 THE COURT: I think maybe a one page memo
21 about it, I don't need anything complex on that,
22 but just something to pin that down, one or two
23 cites, even if they're just e-mailed to me would be
24 enough.

25 MR. MIZRAHI: Okay, Your Honor.

1 THE COURT: And it's really not an issue on
2 count two, I think the disagreement is on the
3 kidnapping, but I'm very aware of the dates as
4 pled, which may be sufficient for the analysis, so
5 I'm not going to request any case law on that
6 issue. What I would say is if you want me to
7 consider something, you're welcome to send it to
8 me, copy the other side, so it's your option.

9 On that Pettaway case, if and when you have
10 the cite, if you wouldn't mind sending it to me,
11 copy the state.

12 MR. LUFRANO: Certainly.

13 THE COURT: Does the recommendation of the
14 presentence investigation report need to be on the
15 record?

16 MR. MIZRAHI: No, Your Honor.

17 MR. LUFRANO: I'm sorry, Your Honor?

18 THE COURT: Does the presentence investigation
19 report's recommendation need to be on the record
20 since it's been referred to today?

21 MR. LUFRANO: I think if the Court wants to
22 the Court can place it, but I don't think it's
23 necessary. I don't think either side is requesting
24 it.

25 THE COURT: Okay. I'm not requesting it be

1 placed on the record. I just wanted to make sure
2 that we addressed that.

3 MR. MIZRAHI: Thank you, Your Honor.

4 I --

5 THE COURT: There is -- go ahead.

6 MR. MIZRAHI: Well, I was just -- I wanted to
7 have a brief rebuttal as to the cases that are
8 similar, Your Honor.

9 THE COURT: Sure.

10 MR. MIZRAHI: First of all, I mean, I think
11 it's your -- obviously, it's your decision, and
12 Mr. Aiken said that he can't judge her. Guess
13 what, Your Honor, you can, and it is your job to
14 judge this case, but I don't think the Court should
15 really consider other cases because every case is
16 different, but I would point out that Judge Mahon
17 here in the Duval Courthouse in 2010 did have a
18 similar case, finding a similar case that happened
19 in this local jurisdiction more similar than the
20 nine year age. A woman, her name is Jasmine White.
21 There is not a case cite just because there was
22 never an appeal or anything, but it's in the court
23 record and you can search the media sites, and
24 Jasmine White was a 19 -- she was young. She was
25 19 years old, and she pretended like she was a DCF

1 worker and tricked a newborn mother, she actually
2 followed them home from the hospital, tricked a
3 newborn mother into giving her child to the pretend
4 DCF worker. She took off with the child. She left
5 behind some paperwork at the mother's home and a
6 fingerprint led to her abduction, I mean to her
7 capture. She was caught 13 hours later. She was
8 sentenced to 18 years in Florida State Prison
9 followed by probation. The whole -- obviously she
10 only was 13 hours with this child. The biggest
11 difference in that case and this case is the
12 Florida sentencing guidelines had already been
13 changed, so there was no top of the guidelines so,
14 you know, the Court didn't have to worry about an
15 80 point whatever top of the guidelines, and then
16 the defendant pled guilty and decided -- and Judge
17 Mahon decided that 18 years was appropriate. So I
18 just wanted to put that on the record as another
19 instructive case for Your Honor.

20 THE COURT: Thank you so much.

21 If I may please speak with counsel at sidebar
22 about the upcoming schedule, and then we're about
23 done for today.

24 (Whereupon, a sidebar conference was had out
25 of the presence of the court reporter, after which

1 the proceedings were resumed as follows:)

2 THE COURT: This is a very unusual case and
3 I'm going to take my time considering everything
4 that has been presented to the Court to make sure
5 that I am as thorough as possible. So what I have
6 done is I have ordered the transcripts from
7 yesterday's proceedings and today's proceedings.
8 Those take ten regular business days. I don't want
9 to spend taxpayer money on rushing it. I think the
10 ten day normal delivery is very reasonable. So ten
11 business days from today would take us to Friday,
12 the 18th for me to receive those transcripts.
13 Sometimes it takes a little bit more than ten days,
14 especially when we've been in court as many hours
15 as we've been in court, and then I will be at the
16 advanced judicial studies class the end of May,
17 which is basically continuing education for judges.
18 So my plan is to work on the sentencing order and
19 come back at a specific date for imposition of
20 sentence, and I should have an order ready to go by
21 then.

22 I've just spoken with both sides, and I
23 believe both sides are available on Friday, June
24 8th, which is just about a month away, and that's
25 exactly what I had estimated on the record at a

1 prior court date, that I thought it would be three
2 to four weeks after the conclusion of the
3 sentencing hearing. So we're right on the track
4 that I previously anticipated. So imposition of
5 sentence will be scheduled for Friday, June 8th, at
6 10:30 a.m., special set from 10:30 to 11 o'clock
7 a.m.

8 And counsel for both sides are available at
9 that time?

10 MR. MIZRAHI: Yes, Your Honor.

11 MS. JOHNSON: Yes, Your Honor.

12 THE COURT: Two things to address with
13 counsel. When I work on a sentencing order, I
14 might choose to reference what the recommendation
15 was of the Florida Department of Corrections and I
16 might choose not to, and I just want to -- I'll
17 think about whether I want to do that and how it
18 affects impasse on the analysis, so it certainly is
19 being considered, but I just wanted to establish on
20 the record, does either side have any objection to
21 that recommendation number being disclosed in the
22 order if I choose to do that?

23 MS. JOHNSON: No, Your Honor. I don't think
24 the recommendation itself is part of the
25 confidentiality of the presentence investigation.

1 THE COURT: Do you have an -- do you believe
2 that --

3 MS. JOHNSON: No objection.

4 THE COURT: So your indication is you have --
5 certainly the presentence investigation report is
6 confidential.

7 MS. JOHNSON: Correct.

8 THE COURT: But you don't have any objection,
9 as I understand your position, in the Court
10 disclosing what that recommendation was if it's
11 something I think needs to be considered. Well, it
12 will be considered, but whether or not I put it in
13 the order, you don't have any objection to it being
14 put in the order?

15 MS. JOHNSON: No, Your Honor.

16 MR. MIZRAHI: The State has no objection.

17 THE COURT: Okay. Then the last thing is, on
18 this legal issue of whether kidnapping is an
19 ongoing crime or, my understanding is that the
20 defendant has pled in count one to kidnapping with
21 the dates being between July 10th, 1998 and July
22 9th, 2016, so the defendant has pled to that
23 kidnapping count as charged with those dates
24 between those years. So, in any event, the
25 defendant has pled guilty to that charge with those

1 and, in any event, I believe both sides agree that
2 the Court may consider the resulting harm to the
3 victims based upon that timeframe that has elapsed.

4 MR. MIZRAHI: That's the State's position and
5 the defense's agreement.

6 MS. JOHNSON: To the victim, yes, ma'am,
7 that's named in count one, and we would -- when we
8 entered -- when Mrs. Williams entered that plea it
9 was with the waiver of any Florida State court
10 defenses.

11 THE COURT: Very well.

12 And Kamiyah Mobley is the only victim listed
13 on the kidnapping count.

14 MS. JOHNSON: Yes, Your Honor.

15 THE COURT: In terms of the listed victim.

16 MS. JOHNSON: Yes, Your Honor.

17 THE COURT: Very well.

18 I appreciate so much all the hard work of the
19 attorneys and professionalism you have all
20 demonstrated today and throughout the pendency of
21 this case. I appreciate all the hard work of
22 everyone involved in the case, all of the time and
23 attention that everyone has dedicated themselves
24 to. And I know that it may seem like a while to
25 wait for a month, but I really want to have those

1 transcripts and I want to make sure I can work on
2 my orders so that I'm satisfied that I have been as
3 thorough as possible.

4 So at this time I believe we're concluded for
5 today. I'm actually not done with court for today.
6 We have a four o'clock hearing that will be in ten
7 minutes, but we'll be in recess, although let's
8 talk about the place for imposition of sentence. I
9 haven't reserved this courtroom for that date, and
10 so I think what I'll do for now is I'll pass it to
11 the regular courtroom that I work in, which is 408,
12 and if anyone wants to bring a request to the
13 Court's attention to move into here, then we'll
14 need to address that at a later time is what I
15 would say.

16 MR. MIZRAHI: Yes, Your Honor.

17 THE COURT: I haven't reserved this courtroom
18 for that day, and so now it will just be in here,
19 and so if we need to move it we can address that.

20 MR. MIZRAHI: Yes, Your Honor.

21 THE COURT: Thank you.

22 So this case is passed to Friday, June 8th,
23 2018, at 10:30 a.m. It's a special set 30 minute
24 hearing from 10:30 to 11:00 for imposition of
25 sentence. We'll be in recess until four 4 o'clock

1 on another matter.

2 MR. MIZRAHI: Thank you, Your Honor.

3 MS. JOHNSON: Thank you, Your Honor.

4 Have a good weekend.

5 (Whereupon, the proceedings were concluded.)

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C E R T I F I C A T E

STATE OF FLORIDA)

COUNTY OF DUVAL)

I, Sharron Ann McLendon, certify that I was
authorized to and did stenographically report the
foregoing proceedings and that the transcript is a true
and complete record of my stenographic notes.

DATED this 18th day of May, 2018.

/s/Sharron A. McLendon
Sharron A. McLendon, FPR