

1 BY MS. BALDWIN:

2 Q. Good afternoon, Ms. Paramore. Now, you indicated
3 that on the day that Beverly came into the hospital that the
4 parents were there until about six o'clock, visiting hours were
5 over, and then you returned to the room, right?

6 A. Correct.

7 Q. Okay. It's an eight-year-old child, right?

8 A. Yes.

9 Q. Okay. And you estimate that -- you estimate that
10 your questioning of her went on for two and a half to three
11 hours?

12 A. My having conversation with her was two and a half
13 to three hours. The questioning was not two and a half to
14 three hours.

15 Q. Okay.

16 A. There --

17 Q. Would you agree --

18 A. -- is a large difference in establishing a rapport
19 and/or eliciting answers investigatively.

20 Q. Okay. Would you agree that two and a half to three
21 hours is a long time for an eight-year-old child getting toward
22 bedtime?

23 A. No, I wouldn't.

24 Q. Okay. So you don't think a child that had spent
25 all -- been up early in the morning, went to the doctor, then

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1 went to school, spent all day in school, came home, went
2 directly from home to the hospital without having a meal, and
3 now, she's in the hospital and it's two and a half to three
4 hours later after her parents then have left; you don't think
5 that would be a long day for an eight-year-old?

6 A. I have no knowledge of how her day was.

7 Q. Okay. Do you have any children of your own?

8 A. Yes.

9 Q. Okay. Would you agree that when it starts to get
10 toward bedtime that they -- that they're not always the best or
11 the easiest people to deal with?

12 A. I would say that they have their good moments and
13 their bad moments.

14 Q. Okay. But basically, toward the end of the day,
15 especially when it starts to get toward bedtime --

16 MR. PROCTOR: Your Honor,, we're going to
17 object as to this being asked and answered.

18 MS. BALDWIN: I haven't finished the question
19 yet.

20 THE COURT: This is getting a little
21 argumentative. Let's move on to something else.

22 MS. BALDWIN: Okay.

23 Q. (BY MS. BALDWIN) So after -- initially, during your
24 conversation she admitted nothing, right?

25 A. She admitted that -- she admitted that something had

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1 happened but not who.

2 Q. Well, I refer you to your statement. Do you
3 remember the affidavit that you did whenever you, I guess, were
4 preparing to turn this case over to the DA's office
5 you -- you wrote an affidavit?

6 A. Which -- which paper is that? Because --

7 Q. You know, I don't have a complete affidavit.

8 MS. BALDWIN: Do you? I don't -- two pages --
9 I'm looking for something that's not complete. And I
10 apologize. I don't want to show you anything that's
11 incomplete.

12 MR. PROCTOR: This?

13 MS. BALDWIN: Thank you.

14 Q. (BY MS. BALDWIN) All right. I just want to refresh
15 your memory a little bit on this if you don't mind.

16 A. Okay.

17 Q. Do you recall writing an affidavit that you
18 submitted to the District Attorney's Office about this case?

19 A. I -- I -- you know what? I was reading this. I --
20 I apologize for --

21 Q. That's okay. Go ahead.

22 A. Could you restate your question?

23 Q. Yes, ma'am. Do you remember submitting an affidavit
24 to the District Attorney's Office or to anyone concerning this
25 case?

1 A. Yes.

2 Q. Okay. All right. And what you're holding in your
3 hand there, is that the affidavit that you submitted?

4 A. It appears to be, yes.

5 Q. Okay. I'm going to take you down to
6 approximately -- one, two, three, four, five, six, seven,
7 eight, nine, 10 lines down. And you'll see on the right-hand
8 side the -- it says 5:15 p.m.

9 A. Here? Yes.

10 Q. Okay. And you say, "The child was thoroughly
11 questioned during which the first part of the interview the
12 child adamantly denied that anyone had hurt her." Do you see
13 that statement?

14 A. Yes.

15 Q. Okay. So when you were thoroughly -- you state that
16 you thoroughly questioned her; is that correct?

17 A. Yes.

18 Q. Okay. So when you say you were just having a talk
19 with her, that's not what was going on, was it?

20 A. I thoroughly questioned her after I had already
21 established a rapport that was not -- it was not putting her
22 through investigatively questioned.

23 Q. Okay. And when you say you -- she did not -- she
24 adamantly denied that anyone had hurt her, at what point
25 during -- at this two and a half, three hour mark, at what

1 point did she finally say to you that something had happened?

2 A. She had initially denied that anyone had -- anyone
3 had hurt her. And then she admitted that someone did, but she
4 couldn't say who.

5 Q. Yes, ma'am. But --

6 A. It would get her in trouble.

7 Q. Yes, ma'am. The -- but that's not my question.

8 A. Oh, I'm sorry.

9 Q. Okay. If you went back at six o'clock to begin your
10 interview with her, because I think you said you -- the parents
11 left at six, right?

12 A. I -- you know, I -- I'm not sure what -- I'm not
13 sure what time they left. I just know that I was there in the
14 room.

15 Q. Well, a minute ago you said --

16 A. Several hours.

17 Q. Yes, ma'am. A minute ago you said that six o'clock
18 was the end of visiting hours and the parents left and you went
19 back?

20 A. Yes, that's correct.

21 Q. Okay. So was it seven o'clock when she admitted
22 that something had happened?

23 A. I -- you know, I would not be able to say an exact
24 time. No.

25 Q. Okay. All right. Well, was it closer to the end of

1 your interview or closer to the beginning of your interview or
2 was it in the middle? Because we have --

3 A. I would say that it was about two-thirds into the
4 interview --

5 Q. Okay. So --

6 A. -- or into the conversation.

7 Q. Yes, ma'am. So if it's two-thirds and it was a
8 three hour interview that means two hours. That's six o'clock,
9 seven o'clock, at eight o'clock, she finally -- you say she
10 finally admits that something happened after you had thoroughly
11 questioned her. Is that -- would that be a true statement?

12 A. Yes --

13 Q. Okay.

14 A. -- that she'd admitted.

15 Q. All right. At eight o'clock, don't you think she's
16 tired of talking to you or anybody else?

17 A. The child did not appear tired to me.

18 Q. Okay. Now, you also testified that you removed
19 Beverly or that Beverly was removed because Laverne could not
20 tell you or assure you that there would be no contact with
21 Brian, right?

22 A. Correct.

23 Q. Is it true or not true that you just said that
24 before you left, after that initial interview, but correct me
25 if I'm wrong, was it after the initial interview with Beverly