

IN THE MATTER OF:

CHRISTINA THOMAS WATSON,

THE SWORN STATEMENT OF DEBRA GLENN BARNES,  
taken pursuant to Notice before R. Keith Kennedy, a Notary  
Public for the State of Alabama at Large, on the 26th day  
of April, 2007, beginning at approximately 9:28 a.m., at  
the offices of United States Attorney's Office, 1801 4th  
Avenue North, Birmingham, Alabama.

**ORIGINAL**

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State v. Watson  
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A P P E A R A N C E S

GARY CAMPBELL, Detective Sergeant, Townsville  
Criminal Investigation Branch, 30 Stanley Street,  
Townsville, Qld 4810

SCOTT KNOWLES, Detective Senior Sergeant,  
Homicide Investigation Unit, 200 Roma Street, Brisbane  
Qld 4000.

HERBERT H. HENRY, Assistant United States  
Attorney for the Northern District of Alabama, 1801  
4th Avenue North, Birmingham, Alabama 35203.

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I N D E X

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DEBRA GLENN BARNES

1 a witness of lawful age, having sworn to tell the  
2 truth, the whole truth, and nothing but the truth, was  
3 examined and testified as follows:  
4

5 EXAMINATION BY MR. CAMPBELL:

6 Q How are you?

7 A Okay.

8 Q I'm Gary Campbell, Detective Sergeant with  
9 the police in Townsville.

10 A Yes, sir.

11 Q Myself and Scott are investigating the  
12 death of Christina Thomas --

13 A Yes, sir.

14 Q -- also known as Watson.

15 And what we're doing is just checking a lot  
16 of background information to assist with our  
17 investigation, okay?

18 A Okay.

19 Q Could I get your full name, please, Debbie?

20 A Debra, D-E-B-R-A, G. Glenn --

21 Q Could you spell that for me, please?

22 A G-L-E-N-N, Barnes.

23 Q And your date of birth, ma'am?

24 A September 26, 1957, '57.

25 Q And what's your current address?

1 A 3566 Valley Circle, Birmingham 35243.

2 Q Did you know Christina Thomas?

3 A Yes.

4 Q How long before prior to her death?

5 A Two years.

6 Q And what position did she hold?

7 A The last position she held was sales  
8 manager of the kids department.

9 Q In the last few months leading up to her  
10 death, what was your position with the company?

11 A Hiring manager.

12 Q And you're actually employed by Saks or  
13 Parisian's?

14 A Parisian's.

15 Q Excuse my pronunciation.

16 A No, that's okay. Which we are now Belk.

17 Q That's my next question, your current  
18 position?

19 A Belk hiring manager.

20 Q So correct me if I'm wrong, it's the same  
21 position, just a change of company name?

22 A Yes, sir.

23 Q Do you work from the same offices,  
24 building, et cetera?

25 A Yes.

1 Q Back in 2003, the months leading up to  
2 Tina's death, and the first couple of months after her  
3 death, what was your actual specifics as a hiring  
4 manager?

5 What were your duties in relation to issues  
6 of insurance?

7 A Issues of?

8 Q Insurance policies.

9 A Okay. I am the hiring manager, which I  
10 have access to the personnel files.

11 Q Sure.

12 A But I had never really looked in her files  
13 because she was a manager at the time. So I never had  
14 really looked in her files and didn't know who her  
15 insurance was made out to. Now, I know that became a  
16 subject when she passed away.

17 Q In your position, were you aware of the  
18 part of the employment package of a year's wages as an  
19 insurance -- so what am I looking for?

20 Do you know what I'm talking about?

21 Can you outline your knowledge of how it  
22 worked?

23 A Yes.

24 Q In the event of the death of an employee,  
25 what was the insurance provisions?

1 A Okay. They had, and we still have this  
2 currently, but, yes, I do know the benefits packet.

3 So you have one times your annual salary  
4 given to you by the company --

5 Q Yes.

6 A -- free by the company.

7 And I'm not aware if she had purchased any  
8 optional life or not. You can purchase optional life  
9 through the company, but I have because it's rather  
10 inexpensive.

11 Q Do you know what salary Tina was on --  
12 Christina was on approximately?

13 A What, what?

14 Q What her salary was?

15 A Salary, I don't know.

16 Q That's okay.

17 Did you have any conversation with  
18 Christina prior to her death in relation to her  
19 insurance policy?

20 A No.

21 Q Was -- are you aware of any inquiry by  
22 Christina with any other person in the company in  
23 relation to her insurance policy?

24 A No.

25 Q Had you seen or viewed Christina's

1 personnel file prior to her death?

2 A No.

3 Q Subsequent to her death, did you receive  
4 any inquiry from any person in relation to Christina's  
5 insurance?

6 A No.

7 Q Did you -- and when I say that, do you  
8 recall any telephone calls from any person?

9 A No.

10 Q You don't recall any direct inquiries by a  
11 person physically in the office?

12 A No, not prior.

13 MR. KNOWLES: No, no, since --

14 Q (By Mr. Campbell) No, I'm talking  
15 subsequent to her death.

16 A After?

17 Q Yes. Let's start again.

18 After the death of Christina --

19 A I'm sorry.

20 Q -- did you receive any phone calls from any  
21 person in relation to Christina's life insurance?

22 A I -- I don't remember receiving a phone  
23 call myself, but I believe Stephanie and Caesar did.  
24 I don't remember.

25 Q Do you recall being approached in-person by

1 any person inquiring about Christina's life insurance  
2 after her death?

3 A There, again, I -- I think he approached --  
4 Gabe probably, or maybe the dad or the mom, approached  
5 Caesar or Stephanie.

6 Q So you think it could be Gabe or the  
7 father?

8 A I think -- what I think I remember, it was  
9 made out to the father --

10 Q Yes.

11 A -- because I don't think she had changed  
12 it, but that's just what I remember. I never saw  
13 anything in writing.

14 But I believe after the funeral and  
15 everything was over that Gabe did come in and ask  
16 about it, but I believe he went straight to Caesar.

17 Q So I'll just take you back a bit.

18 Subsequent to the death, you had -- you do  
19 not recall any conversation with David Gabriel Watson,  
20 also known as Gabe, in relation to Christina's life  
21 insurance policy?

22 A No, sir.

23 Q Are you saying you do not recall or it  
24 didn't happen?

25 A I do not recall, I do not recall. I never



1 really had a conversation with him. I knew he came in  
2 the store --

3 Q Yeah.

4 A -- and he wanted to collect her belongings.

5 And then I think he came into the store to  
6 talk to Caesar about the life insurance.

7 Q And did you --

8 A And that's when he may could have gotten  
9 Stephanie or I involved.

10 Q Did you meet Gabe at all subsequent to the  
11 death of Christina?

12 A I met Gabe at the wedding. That's the  
13 first time I had met him and the only time I had met  
14 him.

15 I was one of the only few that got to go to  
16 the wedding because it was during a big sale and --

17 Q So you have met -- you have only met Gabe  
18 on that one occasion?

19 A Yes, sir.

20 Q Do you recall seeing him in the -- in the  
21 office at all subsequent to the death?

22 A Yes, sir.

23 Q Where did you see him?

24 A I cannot recall if he came in the HR office  
25 or just went straight to Caesar. I know he went to

1 Caesar's office, I do know that, but I don't remember  
2 if he came into the HR office. I cannot remember.

3 Q How big is your HR office?

4 A A little longer than this room.

5 Q So how many people work in that HR office?

6 A Three.

7 Q So there's yourself?

8 A Myself.

9 Q Who else?

10 A Stephanie Mercer.

11 Q Yes.

12 A And Lea Shubert at the time.

13 Q Lea who?

14 A Lea, L-E-A, Shubert, S-H-U-B-E-R-T.

15 Q Does Lea still work there?

16 A She works in our Trussville location.

17 Q Say that again?

18 A Trussville. T-R-U-S-S-V-I-L-L-E.

19 Q That's another town I assume?

20 A It's just a little outskirts.

21 Q So there's only three of you in the office  
22 and you think he may have come into your HR office?

23 A I just can't remember. It's been so long  
24 ago. I -- I really don't recall if he did or not.

25 Q Are you aware if Gabe went to Tina's

1 cubicle?

2 A From what I understand and what I hearsay,  
3 yes, he went down to the office, I believe, to her  
4 cubicle. They have an office set up and it was just  
5 little cubicles like here, you know, like this long  
6 (indicating.)

7 Q You did not see this directly yourself?

8 A No, sir.

9 Q Who did you -- do you recall who this  
10 hearsay came from?

11 A No, sir. And the reason why it's because  
12 everybody -- we were so saddened by this death, you  
13 know. She went on her honeymoon. We're happy for her  
14 getting married, you know. And then all of the sudden  
15 she doesn't even come back from Australia.

16 I know the parents came in and wanted the  
17 belongings, or maybe her sister came with the parents  
18 because she use to work for us, too, and was working  
19 for us at the time.

20 Q Do you recall any general conversational  
21 hearsay around the HR office about inquiries about  
22 Christina's life insurance?

23 A Yes.

24 Q So it was a subject of discussion?

25 A I believe -- just between, you know, like

1 -- like Caesar, me, Stephanie. Not like a -- not like  
2 a general conversation because we can't -- you know,  
3 we're not allowed to.

4 Q Sure.

5 But I also understand how offices work.

6 You have the police come in --

7 A Right.

8 Q -- Detective Flynn come in inquiring  
9 about --

10 A Right, right.

11 Q -- I'm sure --

12 A I'm sure there was talk all over the store.

13 Q But I'm talking specifically in her office,  
14 I'm sure there was no conversation whatsoever about  
15 the detective turning up, you know what I mean?

16 A Right.

17 Q So there was some conversation --

18 A Probably through -- yes, throughout the  
19 store.

20 Q But I'm --

21 A You're talking about just in the HR office?

22 Q Just -- just in the HR office.

23 A There could have been because of the  
24 detective coming in, you know. People are like, whoa,  
25 what's going on?

1 Q In this general conversation that occurred,  
2 can you remember anything in relation to amounts being  
3 talked to different members of the family?

4 A No, sir.

5 Q We've interviewed Mr. Watson a couple of  
6 days ago in the presence of his attorney. And if I  
7 have it correct, he outlined to us that he had spoken  
8 to a Debbie from the HR section at Tina's work after  
9 the death.

10 A Do you know that may -- that -- that could  
11 be, that could very well be. He may have called me  
12 because -- let me tell you how I -- I took like food,  
13 you know, everything over to the Thomas' house, not --  
14 not to Gabe. But I took lots of food and things over  
15 to -- over to the Thomas' house for -- the day of the  
16 funeral.

17 And they kind of -- I think they kind of  
18 felt like I was the contact person. And he may have  
19 called me now -- now that I think about that, he could  
20 have very well talked to me.

21 And then I probably turned him over to  
22 Stephanie or, Caesar, yes. Now, that could very well  
23 be.

24 Q Now, that we've sort of got some refreshing  
25 of your memory, do you remember what the subjects

1 would have been about?

2 A It may have been about the insurance. And  
3 I probably, at that point, turned him to Stephanie  
4 because Stephanie is my boss.

5 Q So you just said she's your boss.

6 Just outline to me the working relationship  
7 between you.

8 A She is the Human Resources Manager, which  
9 is over the whole HR office. And then I am her hiring  
10 manager. And then Lea Shubert was her assistant, our  
11 assistant.

12 But usually the managers' files, Stephanie  
13 is the one to look at the managers' files.

14 Q So for want of a better word, if it was a  
15 checkout apparatus failed, you would have access to  
16 that?

17 A A check for what?

18 Q A person who would work on the floor like  
19 a --

20 MR. KNOWLES: Sales assistant.

21 Q (By Mr. Campbell) -- sales assistant?

22 A Yes.

23 Q Is it a company policy that you did not  
24 access managers' files?

25 A No, sir.

1 Q Can you remember if there was conversation  
2 about any other subject?

3 A No. I would just, you know, ask how he was  
4 doing, how everybody was doing.

5 Q Sure.

6 A You know, general questions like that.

7 Q Specifically, do you remember any reference  
8 wanting to see her desk or anything along those lines  
9 or a cubicle?

10 A You know, I don't really think she had much  
11 in her desk. I think it was all just like some --  
12 there was one thing supposedly that was -- something  
13 she -- he -- Gabe had given Tina.

14 Q Just taking you back.

15 Do you remember any reference in relation  
16 to her -- Gabe wanting to check her cubicle or desk?

17 A I believe he went to Caesar and said he  
18 wanted to check, you know, whatever her -- he wanted  
19 to get her belongings.

20 Q So you have no direct knowledge of that?

21 A No, sir.

22 Q So would this conversation with Gabe about  
23 the insurance, you believe you passed Gabe directly on  
24 to Stephanie?

25 A I believe so. If I had a conversation with

1 him, which I may have. He may have called me directly  
2 because I don't know why they thought I was the  
3 contact person or -- I guess because I was at the  
4 wedding and I was the one, you know, that was kind of  
5 real involved and made sure that everybody got to  
6 funeral and, you know, got to -- to the wake the night  
7 before. I mean, I just felt like our store should  
8 really be a part.

9 Q When you say everyone, are you talking  
10 about just within the company?

11 A Managers mainly. And then associates came  
12 on their own if they wanted to, you know.

13 I -- I tried to get the management team  
14 together to make sure that everybody -- and some of  
15 the managers that didn't know her that were, you know  
16 -- just gotten to the store or whatever, they stayed  
17 behind and watched the store.

18 Q Subsequent to the death of Tina, did you  
19 ever have cause to look at her personnel file?

20 A No, sir.

21 Q Did you ever, by chance, see the file?

22 A No, sir.

23 Q Subsequent to her death, did you ever  
24 generate any correspondence that was to be put in her  
25 file?



- 1 A No, sir.
- 2 Q Would you have recorded somewhere or made a  
3 notation of this telephone call from Gabe?
- 4 A No, sir.
- 5 Q Do you have a work journal or work diary  
6 that you maintained during the day?
- 7 A I do.
- 8 Q Is it possible that there could be a  
9 notation in there and you cannot recall?
- 10 A There could be. I could look. I think I  
11 might have those prior years.
- 12 What year are we talking about?
- 13 Q 2003.
- 14 A 2003. I can look back.
- 15 Q The months of October, November, December.  
16 Would you have any problems with producing  
17 the diary so we could view it?
- 18 A Oh, no.
- 19 Q That wouldn't be a problem?
- 20 A Oh, no.
- 21 Q Subsequent to the death of Tina, did you  
22 ever go and view her cubicle?
- 23 A No, sir.
- 24 Q Are you aware of any person outside the  
25 company going to her cubicle?

1 A No, sir.

2 Q Are you aware of any --

3 A Well, besides her parents and maybe her  
4 sister.

5 Q Do you know when that occurred?

6 A I don't know if was a few days after the  
7 funeral, a couple of days, a day. It could have even  
8 been a day.

9 Q How did you come by this knowledge?

10 A Hearsay around the store.

11 Q Do you recall who told you at all?

12 A No, sir.

13 Q So you were not present at any time in her  
14 cubicle when it was searched by any person --

15 A No, sir.

16 Q -- including her desk?

17 A No, sir.

18 Q Prior to her death, taking you back  
19 further, did you ever have any conversation with  
20 Christina in relation to scuba diving?

21 A All she told me was that she was -- you  
22 know, we had been talking about the wedding and she's  
23 like, we're going to scuba diving, we're going to  
24 Australia, which she always she wanted to do.

25 Wanted to go to the zoo, which I know y'all

1 have seen the picture of her at the zoo.

2 And then talked about, you know, going  
3 scuba diving that -- I think she was taking lessons  
4 here, from what I understood she was taking lessons.

5 Q Did she discuss any concerns she had with  
6 scuba diving?

7 A No, sir.

8 Q On the other end of that, did she make any  
9 comment about if she was enjoying the scuba diving or  
10 not?

11 A She did not.

12 Q Did you ever discuss any relationship  
13 issues with Tina, prior to her death, about her  
14 mother?

15 A No, sir.

16 Q Did you ever discuss any relationship  
17 issues with Tina, prior to her death, about Gabe?

18 A About Gabe?

19 The only thing she ever told me was that  
20 her parents -- her parents didn't really care for him.  
21 They didn't say she -- they hate -- you know, that  
22 there was hate or anything like that. She just said  
23 they're not greatly happy with him, but, you know, she  
24 said I love him.

25 She went out and bought a -- I think she

1 must have had a small car. I didn't know what kind of  
2 car she had, but she went out and bought a Cherokee  
3 Jeep for him to fit in.

4 Q He's a tall fellow?

5 A Yeah. And she just told me -- she said I  
6 only went out to buy a Jeep, you know, because --  
7 because Gabe can't get in my car. So I guess she had  
8 a small car. Well, I don't really know.

9 I didn't know her that well, but I kind of  
10 got to know her closer to the wedding time. She was a  
11 funny person.

12 We went through the death of her little dog  
13 with her. That was awful. I went through that with  
14 her.

15 Q Was there any people she was particularly  
16 close to within your company that you are aware of  
17 aside from you knowing?

18 A You know, I've been trying to think about  
19 that, who -- who would it be that she was really close  
20 to.

21 She worked in shoes for a while.

22 I'm trying to remember who she use to eat  
23 lunch with. I don't really know. Sometimes some of  
24 the managers would -- you know, they would like all go  
25 out to lunch together or -- but I don't really

1 particularly recall who she was the closest to.

2 EXAMINATION BY MR. KNOWLES:

3 Q Do you have any knowledge of Tina wanting  
4 to increase her life insurance policy?

5 A No, sir.

6 Q You don't know about any of that?

7 A Huh-huh (negative response.)

8 Q From what I understand, though, you can  
9 increase it.

10 You're saying maybe it's an option, you can  
11 increase it?

12 A During open enrollment once per year you  
13 can by optional life insurance.

14 Q How high can you take that to?

15 A At that point, it was three times your  
16 annual salary.

17 Q Who would Tina see then to -- to actually  
18 do that?

19 A Stephanie Mercer.

20 Q She had to see Stephanie?

21 A I mean, she could mention it to me, she  
22 could mention it to Lea, but we would have probably  
23 then turned over to Stephanie.

24 But if it was during open enrollment, you  
25 know, we can do that as well. We just let them fill

1 out a form.

2 Q When you say open enrollment, that's when  
3 they first sign on?

4 A That's just in November. Like usually the  
5 -- November of every year we have open enrollment  
6 where if you want to add something to your benefits or  
7 delete something from your benefits then you can.

8 Q How difficult is it to increase outside  
9 open enrollment?

10 A Oh, open enrollment you can buy -- you can  
11 -- if she didn't have any optional life insurance, she  
12 can purchase that at that time. She can purchase up  
13 to three times.

14 Now, I think you do have to do a -- I  
15 remember this. You do have to do a certification form  
16 to send it off, you know, a pre-certification form to  
17 send it off to the company to see if you're eligible  
18 for it.

19 Q Do you know of any form that Tina might  
20 have filled out?

21 A No, sir.

22 Q So outside of November when open enrollment  
23 is -- occurs, can you increase your life insurance  
24 policy?

25 A No, sir, no, sir.

1 Q It's only during that open?

2 A It has to be, uh-huh (affirmative  
3 response.)

4 Either when you sign on or during open  
5 enrollment.

6 MR. KNOWLES: Thank you.

7 REEXAMINATION BY MR. CAMPBELL:

8 Q With any insurance policies, do you know  
9 would they would be held with, which company they  
10 would be held with back then?

11 A I do not.

12 Q Does the name UnamProvident Corporation  
13 ring a bell?

14 A Yes. UnamProvident, yeah.

15 Q So to be specific, now that it rings a  
16 bell, they are the organization any insurance policies  
17 would have been held with --

18 A Yes, sir.

19 Q -- back in 2003?

20 A Yes, I believe so.

21 REEXAMINATION BY MR. KNOWLES:

22 Q Do you know of a journal that Tina was  
23 keeping?

24 Just -- it was a personal journal, not a  
25 work-related one.

1 A I do not.

2 REEXAMINATION BY MR. CAMPBELL:

3 Q Excuse me for a minute.

4 What was Christina's hours of duty as the  
5 sales manager at your -- sorry, at that position that  
6 she held prior to her death, what sort of hours of  
7 duty on a weekly basis would she have?

8 A Hours?

9 Q Yeah.

10 A At least 40 and more, sometimes more.

11 Q Is that --

12 A Depending on the time of the year.

13 Q Is that solely a weekday job or does it  
14 include weekends or --

15 A Oh, it includes weekends, nights. Two  
16 nights a week, one of them being a Friday or Saturday.  
17 Sundays, two Sundays a month. Nights, weekends.  
18 Pretty much every Saturday unless you've previously  
19 arranged to be off.

20 Q So affectively she's a shift worker, that's  
21 spreading shifts across the week night and day?

22 A Right, but in a manager capacity.

23 Q Sure.

24 A And they work a lot of hours sometimes.

25 Q So do you know her -- approximately how



1 many people she was in charge of back in that time  
2 period?

3 A Probably around eight to nine.

4 MR. CAMPBELL: That's all I have.

5 EXAMINATION BY MR. HENRY:

6 Q Let me -- excuse me just a second.

7 You said you went to her -- to the wedding?

8 A Yes, sir.

9 Q But a lot of other folks couldn't go  
10 because of --

11 A Bargain Days.

12 Q -- the store is always opened?

13 Do you remember the day of the week the  
14 wedding was?

15 Was it on a weekend?

16 A It was on a Saturday.

17 Q Do you have a recollection as to whether or  
18 not she worked in the week leading up to her wedding?

19 A I think she took a few days off. A few  
20 days off before then. I don't know if took the whole  
21 week, but I would think she would have taken a few  
22 days off to prepare, you know, for the wedding.

23 Q If -- with regard to insurance policies, if  
24 one wants to change the beneficiary of the policy,  
25 what is the process that's done?

1 I assume it would be the same for managers  
2 and employees?

3 A Yes, sir, yes, sir, it would.

4 You can change your beneficiary at any  
5 time. You just, you know, have to sign a new paper, a  
6 new form and we have to put that in your file.

7 So we -- if -- if she had changed the  
8 beneficiary, it would have to have been in her file.

9 Q And if the paperwork needed to change  
10 beneficiaries it's just a document?

11 A Document.

12 Q You just got to sign something?

13 A Yes, sir.

14 Q When one changes the beneficiary on their  
15 policy, does that permit them to increase their policy  
16 limits at that point if they wanted to?

17 A No, sir.

18 Q They'd still have to wait?

19 A Still had to wait until open enrollment.

20 Q Can you increase the policy limits without  
21 there being -- if you have already have it can you --  
22 exercising the option of increasing the policy limits,  
23 can that been done at any time or do you have to wait  
24 for open enrollment?

25 A You still have to wait for open enrollment.

1 To my understanding, that's the way I've always  
2 understood it.

3 Q I understand.

4 And how often do you have open enrollment?

5 A Once a year. And we usually have it in  
6 November with Saks and Parisian. It always came in  
7 November right when we were busy trying to hire for  
8 Christmas and get ready for the holidays.

9 MR. HENRY: That was all. Thank you.

10 MR. CAMPBELL: Thank you for your time.

11 THE WITNESS: Thank you so much.

12 Thank you, I appreciate it. Nice to meet  
13 you.

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15 END OF STATEMENT

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C E R T I F I C A T E

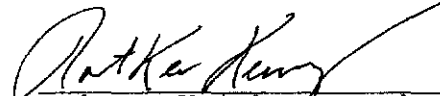
STATE OF ALABAMA )

JEFFERSON COUNTY )

I, ROBERT KEITH KENNEDY, Notary Public for the State of Alabama at Large, hereby certify that I am the Court Reporter who made machine shorthand notes of the foregoing sworn statement at the time and place stated in the Caption thereof; that I later reduced my shorthand notes into typewriting; that the foregoing pages numbered three through twenty-eight, both inclusive, contain a full, true, and correct transcript of proceedings had on said occasion.

I further certify that the witness was duly sworn by me before the giving of this sworn statement and that I am in no way related to nor employed by any of the parties, the witness or counsel, and that I have no interest in the outcome of this matter.

Given under my hand and seal this the 4th day of June 2007.

  
Robert Keith Kennedy  
Notary Public

My Commission Expires  
September 5, 2010