

EXHIBIT A

Michael F.A. Colucci - July 15, 2026

1

STATE OF SOUTH CAROLINA) THE COURT OF COMMON PLEAS
)
COUNTY OF BERKELEY) CASE NO. 2017-CP-08-2672

The Estate of Sara Lynn)
Colucci, by and through)
Successor Personal)
Representative Barbara)
Moore,)

Plaintiffs,)

vs.)

Michael F.A. Colucci,)

Defendants.)

* * * * *

VIDEOTAPED

DEPOSITION OF: MICHAEL F.A. COLUCCI

DATE TAKEN: Wednesday, July 15, 2026

TIME: 10:06 a.m.

PLACE: Pierce Sloan Kennedy & Early
321 East Bay Street
Charleston, South Carolina

REPORTED BY: EVE WILBANKS
Registered Professional
Reporter, Certified LiveNote
Reporter and Notary Public

* * * * *

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A P P E A R A N C E S

REPRESENTING THE PLAINTIFF:

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REPRESENTING THE DEFENDANT:

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ALSO PRESENT: JEFF TYNER, LEGAL VIDEOGRAPHER

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TESTIMONY OF MICHAEL F.A. COLUCCI

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S T I P U L A T I O N S

It is hereby stipulated and agreed by and between the parties hereto, through their respective counsel, that the reading and signing of the transcript is waived by the Deponent.

THE VIDEOGRAPHER: We are on the record in the video deposition of Michael F.A. Colucci, in the matter of the Estate of Sara Lynn Colucci versus Michael F.A. Colucci. The case number is 2017-CP-08-2672.

Today's date is July 15th, 2026. We are located at the office of Pierce Sloan Kennedy & Early, LLC, in Charleston, South Carolina. The court reporter is Eve Wilbanks. My name is Jeff Tyner.

The time is now 10:07. Would Counsel please identify themselves for the record?

MR. SMOOT: Ben Smoot for the Estate of Sara Colucci.

MR. GENTRY: John Gentry, for the Defendant, Michael Colucci.

THE VIDEOGRAPHER: Thank you. And, Madam Court Reporter, could you please swear in the witness?

MICHAEL F.A. COLUCCI, SWORN.

EXAMINATION

BY MR. SMOOT:

Q. Michael, good morning. Please state your full legal name.

A. Michael Frederick Antonio Colucci.

Q. Did you change your surname from Antonio to Colucci at any point?

A. I respectfully decline to answer any questions today under the rights and privileges afforded to me and every citizen under the Fifth Amendment to the United States Constitution. This will be my answer to any further questions.

Q. If you would, confirm your date of birth.

A. I respectfully decline to answer any questions today under the rights and privileges afforded to me and every citizen under the Fifth Amendment to the United States Constitution. This will be my answer to any further questions.

Q. Where do you currently reside?

A. I respectfully decline to answer any questions today under the rights and privileges afforded to me and every citizen under the Fifth Amendment to the United States Constitution. This will be my answer to any further questions.

1 Q. Do you still hold any ownership interest
2 in the Daniel Island or St. Thomas parcel of
3 property?

4 A. I respectfully decline to answer any
5 questions today under the rights and privileges
6 afforded to me and every citizen under the Fifth
7 Amendment to the United States Constitution. This
8 will be my answer to any further questions today.

9 Q. What color tie do you have on?

10 A. I respectfully -- I respectfully decline
11 to answer any questions today under the rights and
12 privileges afforded to me and every citizen under
13 the Fifth Amendment to the United States
14 Constitution. This will be my answer to any
15 further questions.

16 Q. When and how did you meet Sara Colucci?

17 A. I respectfully decline to answer any
18 questions today under the rights and privileges
19 afforded to me and every citizen under the Fifth
20 Amendment to the United States Constitution. This
21 will be my answer to any further questions today.

22 Q. Were you and Sara civilly married on
23 September 25th, 2012?

24 A. I respectfully decline to answer any
25 questions today under the rights and privileges

1 afforded to me and every citizen under the Fifth
2 Amendment to the United States Constitution. This
3 will be my answer to any further questions.

4 Q. In May of 2015, was your marital home
5 with Sara, at 177 Woodbrook Way, Moncks Corner, in
6 foreclosure?

7 A. I respectfully decline to answer any
8 questions today under the rights and privileges
9 afforded to me and every citizen under the Fifth
10 Amendment to the United States Constitution. This
11 will be my answer to any further questions.

12 MR. SMOOT: Eve, we'll mark this as
13 Exhibit 1, Plaintiff's Notice of Deposition.
14 That's just the Notice.

15 (Patient's Exhibit No. 1, Notice of
16 Deposition, was marked for identification.)

17 MR. GENTRY: Okay.

18 MR. SMOOT: And we'll mark as
19 Plaintiff's Exhibit 2 an incident report from
20 the Summerville Police Department, dated June
21 19th, 2015.

22 (Patient's Exhibit No. 2, Summerville
23 Police Department Officer Report for Incident
24 6/19/15, was marked for identification.)

25 BY MR. SMOOT:

1 Q. Mr. Colucci, I'm handing you what we've
2 marked as Plaintiff's Exhibit No. 2. It's a
3 Summerville Police Department incident report from
4 June of 2015. On June 5th, 2015, about two weeks
5 after Sara died, you gave Brian Whitfield a \$7,000
6 check for a 2-carat diamond he consigned to
7 Colucci's Jewelry on March 21st, 2015, for \$8,500.
8 That check could not be cashed, correct?

9 A. I respectfully decline to answer any
10 questions today under the rights and privileges
11 afforded to me and every citizen under the Fifth
12 Amendment to the United States Constitution. This
13 will be my answer to any further questions.

14 Q. You texted Mr. Whitfield that you were
15 obtaining a 50- to \$70,000 line of credit and
16 referred to "a very difficult time for my children
17 and myself." Is that an accurate description of
18 your finances in May and June of 2015?

19 A. I respectfully decline to answer any
20 questions today under the rights and privileges
21 afforded to me and every citizen under the Fifth
22 Amendment to the United States Constitution. This
23 will be my answer to any further questions.

24 (Plaintiff's Exhibit No. 3, Summerville
25 Police Department Officer Report for Incident

1 October 2014, was marked for identification.)

2 BY MR. SMOOT:

3 Q. I'll hand you what is going to be marked
4 as Plaintiff's Exhibit 3 to your deposition, Mr.
5 Colucci. This is a Summerville Police Department
6 incident report from the fall of 2014. Between
7 October 2nd and October 4th, 2014, you reported a
8 \$33,000 diamond ring missing from your business.
9 Did you make an insurance claim on that ring?

10 A. I respectfully decline to answer any
11 questions today under the rights and privileges
12 afforded to me and every citizen under the Fifth
13 Amendment to the United States Constitution. This
14 will be my answer to any further questions today.

15 Q. Mr. Colucci, did you have any life
16 insurance policy on Sara's life?

17 A. I respectfully decline to answer any
18 questions today under the rights and privileges
19 afforded to me and every citizen under the Fifth
20 Amendment of the United States Constitution. This
21 will be my answer to any further questions today.

22 Q. Mr. Colucci, if you would, identify
23 every LLC, corporation, partnership or other
24 business entity in which you have held any
25 ownership, membership or managerial interest in in

1 2015 and presently today.

2 A. I respectfully decline to answer any
3 questions today under the rights and privileges
4 afforded to me and every citizen under the Fifth
5 Amendment to the United States Constitution. This
6 will be my answer to any further questions.

7 Q. Since Sara's death, have you sold,
8 transferred, gifted or refinanced any interest in
9 any of the properties that you have owned? For
10 each transaction, identify the date, the property
11 or the entity, the consideration paid and to whom
12 it was transferred.

13 A. I respectfully decline to answer any
14 questions today under the rights and privileges
15 afforded to me and every citizen under the Fifth
16 Amendment to the United States Constitution. This
17 will be my answer to any further questions.

18 Q. On November 3rd, 2015, you were
19 convicted in Summerville Municipal Court of
20 operating without a required business license.
21 And a bench warrant was issued January 12th, 2016,
22 when the fine went unpaid, leading to your arrest
23 for failure to appear on February 13th, 2016. Was
24 jewelries -- was Colucci's Jewelry business
25 operating without a valid business license in

1 2015?

2 A. I respectfully decline to answer any
3 questions today under the rights and privileges
4 afforded to me and every citizen under the Fifth
5 Amendment to the United States Constitution. This
6 will be my answer to any further questions.

7 (Plaintiff's Exhibit No. 4, Summerville
8 Police Department Officer Report for Incident
9 2/13/16, was marked for identification.)

10 BY MR. SMOOT:

11 Q. And what Plaintiff has made Exhibit 4 to
12 your deposition, Mr. Colucci, are the law
13 enforcement records and incident report from the
14 subject of that previous question.

15 Mr. Colucci, was your driver's license
16 suspended and commercial driver's license
17 disqualified as of February 2016?

18 A. I respectfully decline to answer any
19 questions today under the rights and privileges
20 afforded to me and every citizen under the Fifth
21 Amendment to the Constitution -- United States
22 Constitution. This will be my answer to any
23 further questions.

24 Q. Mr. Colucci, your testimony in the
25 deposition of Chandler v. Ivo Colucci, you

1 admitted to using drugs with Sara during your
2 marriage. Did you regularly use drugs with Sara
3 during your marriage to her?

4 A. I respectfully decline to answer any
5 questions today under the rights and privileges
6 afforded to me and every citizen under the Fifth
7 Amendment to the United States Constitution. This
8 will be my answer to any further questions.

9 Q. During your marriage to Sara Colucci,
10 did you regularly use and consume marijuana,
11 cocaine and narcotics?

12 A. I respectfully decline to answer any
13 questions today under the rights and privileges
14 afforded to me and every citizen under the Fifth
15 Amendment to the United States Constitution. This
16 will be my answer to any further questions.

17 Q. Who is Sharna K. Bilbro, and what is
18 your current relationship with her?

19 A. I respectfully decline to answer any
20 questions today under the right and privileges
21 afforded to me and every citizen under the Fifth
22 Amendment to the United States Constitution. This
23 will be my answer to any further questions.

24 Q. From 2014 to 2000- -- to May of 2015,
25 Mr. Colucci, would you agree that there was

1 significant tension and stress in your marriage
2 with Sara?

3 A. I respectfully decline to answer any
4 questions today under the rights and privileges
5 afforded to me and every citizen under the Fifth
6 Amendment to the United States Constitution. This
7 will be my answer to any further questions.

8 MR. GENTRY: Can we go off the record
9 for a second?

10 THE VIDEOGRAPHER: The time is 10:18,
11 and we are off the record.

12 (The deposition went off the record.)

13 THE VIDEOGRAPHER: The time is 10:19,
14 and we are back on the record.

15 BY MR. SMOOT:

16 Q. Mr. Colucci, have you had a chance to
17 review text message correspondence between you and
18 Sara before her death? And if so, is the nature
19 and substance of that communication representative
20 of the relationship between you two before her
21 death in May of 2015?

22 A. I respectfully decline to answer any
23 questions today under the rights and privileges
24 afforded to me under the Fifth Amendment to the
25 United States Constitution.

1 Q. Did Sara call 9-1-1 during arguments
2 with you in your home in the months before her
3 death?

4 A. I respectfully decline to answer any
5 questions today under the rights and privileges
6 afforded to me under the Fifth Amendment to the
7 United States Constitution.

8 Q. In the days before May 20, 2015, were
9 you aware that Sara intended to leave you and file
10 for divorce?

11 A. I respectfully decline to answer any
12 questions today under the rights and privileges
13 afforded to me under the Fifth Amendment to the
14 United States Constitution.

15 Q. Were you ever physically violent with
16 Sara's father before her death?

17 A. I respectfully decline to answer any
18 questions today under the rights and privileges
19 afforded to me under the Fifth Amendment to the
20 United States Constitution.

21 Q. Before Sara's death, did you choke
22 Curtis Reid and flip him onto the floor, breaking
23 his lower left leg and ankle? And I've marked as
24 Plaintiff's Exhibit 5 a memo to that effect.

25 (Plaintiff's Exhibit No. 5, Memo

1 regarding Curtis Reid 1/2/23, was marked for
2 identification.)

3 A. I respectfully decline to answer any
4 questions today under the rights and privileges
5 afforded to me under the Fifth Amendment to the
6 United States Constitution.

7 Q. Were you a wrestler at Summerville High
8 School while in high school?

9 A. I respectfully decline to answer any
10 questions today under the rights and privileges
11 afforded to me under the Fifth Amendment to the
12 United States Constitution.

13 Q. Were you and Sara using cocaine in the
14 days before and on the day of Sara's death, May
15 20th, 2015?

16 A. I respectfully decline to answer any
17 questions today under the rights and privileges
18 afforded to me under the Fifth Amendment to the
19 United States Constitution.

20 Q. Were you consuming alcohol on May 20th,
21 2015? And if so, where did you purchase it?

22 A. I respectfully decline to answer any
23 questions today under the rights afforded to me
24 under the Fifth Amendment to the United States
25 Constitution.

1 Q. Was there marijuana in your vehicle on
2 May 20th, 2015, at the Gold Standard, 2206 North
3 Main Street, Summerville?

4 A. I respectfully decline to answer any
5 questions today under the rights afforded to me
6 under the Fifth Amendment to the United States
7 Constitution.

8 Q. Do you disagree with the statement of a
9 neighbor of yours at 177 Woodbrook, Bob O'Leary,
10 who characterized your behavior with Sara as
11 aggressive in the spring of 2015?

12 A. I respectfully decline to answer any
13 questions today under the rights and privileges
14 afforded to me under the Fifth Amendment of the
15 United States Constitution.

16 Q. Did you and Sara both wake up at 177
17 Woodbrook Way the morning of May 20th, 2015?

18 A. I respectfully decline to answer any
19 questions today under the rights and privileges
20 afforded to me under the Fifth Amendment to the
21 United States Constitution.

22 Q. If you would, Mr. Colucci, identify
23 every location that you visited before you went to
24 your attorney's office downtown on May 20th, 2015,
25 that day.

1 A. I respectfully decline to answer any
2 questions today under the rights and privileges
3 afforded to me under the Fifth Amendment to the
4 United States Constitution.

5 Q. Can you identify today what time you
6 arrived at your attorney's office in downtown
7 Charleston on May 20th, 2015?

8 A. I respectfully decline to answer any
9 questions today under the rights and privileges
10 afforded to me under the Fifth Amendment to the
11 United States Constitution.

12 Q. Sara called her mother, Barbara, that
13 day at around 3:30 p.m. while you were at or near
14 your attorney's office. Were you physically with
15 Sara during her call to her mother that day?

16 A. I respectfully decline to answer any
17 questions today under the rights and privileges
18 afforded to me under the Fifth Amendment to the
19 United States Constitution.

20 Q. After you all left your attorney's
21 office that afternoon from downtown Charleston,
22 where did you go? Please walk me through every
23 stop in order, ending at the Gold Standard later
24 that day.

25 A. I respectfully decline to answer any

1 questions today under the rights and privileges
2 afforded to me under the Fifth Amendment to the
3 United States Constitution.

4 Q. Why did you all go to Michael Vieira's
5 cemetery or grave site that day after the
6 attorney's office?

7 A. I respectfully decline to answer any
8 questions today under the rights and privileges
9 afforded to me under the Fifth Amendment to the
10 United States Constitution.

11 Q. After that visit, are you able to
12 testify as to why you and Sara went to the Gold
13 Standard, 2206 North Main Street, Summerville?

14 A. I respectfully decline to answer any
15 questions today under the rights and privileges
16 afforded to me under the Fifth Amendment to the
17 United States Constitution.

18 Q. Are you able to identify or tell us
19 whose decision it was to go to that location that
20 day?

21 A. I respectfully decline to answer any
22 questions today under the rights and privileges
23 afforded to me under the Fifth Amendment to the
24 United States Constitution.

25 Q. At that time, were you using that

1 physical location, 2206 North Main Street,
2 Summerville, where the Gold Standard was located,
3 in your business dealings?

4 A. I respectfully decline to answer any
5 questions today under the rights and privileges
6 afforded to me under the Fifth Amendment to the
7 United States Constitution.

8 Q. Did Sara Colucci have keys to any of the
9 doors or locks at that physical location on the
10 day of her death?

11 A. I respectfully decline to answer any
12 questions today under the rights and privileges
13 afforded to me under the Fifth Amendment to the
14 United States Constitution.

15 Q. When you and Sara arrived at 2206 North
16 Main Street on May 20th, 2015, Mr. Colucci, who
17 got out of the vehicle first?

18 A. I respectfully decline to answer any
19 questions today under the rights and privileges
20 afforded to me under the Fifth Amendment to the
21 United States Constitution.

22 Q. I have seen photographs of the vehicle
23 at the property address. It appears to me to have
24 had two gates leading into the property. Was the
25 first gate locked when you and Sara Colucci

1 arrived to that location on the afternoon or
2 evening of May 20th, 2015?

3 A. I respectfully decline to answer any
4 questions today under the rights and privileges
5 afforded to me under the Fifth Amendment to the
6 United States Constitution.

7 Q. From the time, Mr. Colucci, that you and
8 Sara arrived at 2206 North Main Street that day to
9 the time that you have previously indicated you
10 came to Sara, did you get out of your vehicle at
11 any point in time and get back in it?

12 A. I respectfully decline to answer any
13 questions today under the rights and privileges
14 afforded to me under the Fifth Amendment to the
15 United States Constitution.

16 Q. You have said in prior statements, Mr.
17 Colucci, that Sara went between the building and
18 the fence and stood there for several minutes,
19 about seven minutes. Is that your testimony here
20 today as well?

21 A. I respectfully decline to answer any
22 questions today under the rights and privileges
23 afforded to me under the Fifth Amendment to the
24 United States Constitution.

25 Q. You have said, Mr. Colucci, that you

1 never took your eyes off of Sara. Is that true?
2 Is that your testimony also here today?

3 A. I respectfully decline to answer any
4 questions today under the rights and privileges
5 afforded to me under the Fifth Amendment to the
6 United States Constitution.

7 Q. If you would, please, sir, describe
8 exactly what you saw when you found Sara. What
9 was her body position?

10 A. I respectfully decline to answer any
11 questions today under the rights and privileges
12 afforded to me under the Fifth Amendment to the
13 United States Constitution.

14 Q. Was Sara standing, leaning or on the
15 ground when you first saw her in distress?

16 A. I respectfully decline to answer any
17 questions today under the rights and privileges
18 afforded to me under the Fifth Amendment to the
19 United States Constitution.

20 Q. If you would, sir, please describe the
21 garden hose. Where was it? Was it around her
22 neck? How was it positioned?

23 A. I respectfully decline to answer any
24 questions today under the rights and privileges
25 afforded to me under the Fifth Amendment to the

1 United States Constitution.

2 Q. At what point in time, Mr. Colucci,
3 after you and Sara arrived at 2206 North Main
4 Street in Summerville, did you first observe Sara
5 either handling the hose at issue in this case or
6 with it around her neck?

7 A. I respectfully decline to answer any
8 questions today under the rights and privileges
9 afforded to me under the Fifth Amendment to the
10 United States Constitution.

11 Q. Did you remove the hose from her neck?
12 Did you lay her down? And at what angle, Mr.
13 Colucci?

14 A. I respectfully decline to answer any
15 questions today under the rights and privileges
16 afforded to me under the Fifth Amendment to the
17 United States Constitution.

18 Q. Did you perform CPR or mouth to mouth to
19 Sara? And if so, for how long, sir?

20 A. I respectfully decline to answer any
21 questions today under the rights and privileges
22 afforded to me under the Fifth Amendment to the
23 United States Constitution.

24 Q. At the scene, sir, you had blood coming
25 from your mouth. You told a deputy "it was from

1 me doing CPR." Is that your testimony today?

2 A. I respectfully decline to answer any
3 questions today under the rights and privileges
4 afforded to me under the Fifth Amendment to the
5 United States Constitution.

6 Q. You had two cellphones at the scene,
7 sir. One was yours, one was Sara's -- Sara's with
8 a shattered screen. Are you able to testify today
9 as to why Sara's cellphone was shattered?

10 A. I respectfully decline to answer any
11 questions today under the rights and privileges
12 afforded to me under the Fifth Amendment to the
13 United States Constitution.

14 Q. On the day of the incident, May 20th,
15 2015, did you decline to give a recorded interview
16 to law enforcement?

17 A. I respectfully decline to answer any
18 questions today under the rights and privileges
19 afforded to me under the Fifth Amendment to the
20 United States Constitution.

21 Q. Did you retain an attorney for the
22 matter involving Sara Colucci's death on the day
23 of her death, May 20th, 2015?

24 A. I respectfully decline to answer any
25 questions today under the rights and privileges

1 afforded to me under the Fifth Amendment to the
2 United States Constitution.

3 Q. Did you have Sara's body cremated? If
4 so, when and why?

5 A. I respectfully decline to answer any
6 questions today under the rights and privileges
7 afforded to me under the Fifth Amendment to the
8 United States Constitution.

9 Q. After Sara's death, Mr. Colucci, did you
10 take Bishop to live with you, Doris and Ivo at 400
11 Murray in July of 2015, away from her maternal
12 grandparents?

13 A. I respectfully decline to answer any
14 questions today under the rights and privileges
15 afforded to me under the Fifth Amendment to the
16 United States Constitution.

17 Q. Do you agree, Mr. Colucci, that the last
18 activity on your cellphone on the day of Sara's
19 death was 5:46 p.m. until you called 9-1-1 at 7:12
20 p.m. that day?

21 A. I respectfully decline to answer any
22 questions today under the rights and privileges
23 afforded to me under the Fifth Amendment to the
24 United States Constitution.

25 Q. Do you agree, sir, that Sara was wearing

1 a necklace at the time of her death; and if so,
2 are you able to describe it today?

3 A. I respectfully decline to answer any
4 questions today under the rights and privileges
5 afforded to me under the Fifth Amendment to the
6 United States Constitution.

7 Q. All right, Mr. Colucci. We'll mark as
8 Plaintiff's Exhibit 6 a copy of Sara's final
9 autopsy report.

10 (Plaintiff's Exhibit No. 6, Autopsy
11 Final Report, was marked for identification.)
12 BY MR. SMOOT:

13 Q. Sir, you understand that Dr. Lee Marie
14 Tormos performed Sara's autopsy and found the
15 cause of death to be asphyxia by neck compression?

16 A. I respectfully decline to answer any
17 questions today under the rights and privileges
18 afforded to me under the Fifth Amendment to the
19 United States Constitution.

20 Q. And that autopsy performed by Dr. Tormos
21 describes multiple separate parallel furrows on
22 the front of Sara's neck, 5 inches long, about
23 5/8ths inch apart, crossing the midline over the
24 hyoid bone, oriented horizontally; were you aware
25 of that, sir?

1 A. I respectfully decline to answer any
2 questions today under the rights and privileges
3 afforded to me under the Fifth Amendment to the
4 United States Constitution.

5 Q. The furrow was essentially horizontally,
6 not angled sharply, upward toward a suspension
7 point, as one would suspect in a hanging. Can you
8 explain how a person hangs themselves on a fence
9 post and leaves a horizontal mark?

10 A. I respectfully decline to answer any
11 questions today under the rights and privileges
12 afforded to me under the Fifth Amendment to the
13 United States Constitution.

14 Q. In light of your prior statements, sir,
15 that you had never taken your eyes off of Sara and
16 the findings from the autopsy which found a
17 fracture of Sara's superior horn of the right
18 thyroid cartilage with hemorrhage, do you have any
19 explanation for those internal neck injuries, sir?

20 A. I respectfully decline to answer any
21 questions today under the rights and privileges
22 afforded to me under the Fifth Amendment to the
23 United States Constitution.

24 Q. Would you agree that Sara was 5-feet, 4-
25 inches tall and weighed approximately 150 pounds

1 on May 20th, 2015?

2 A. I respectfully decline to answer any
3 questions today under the rights and privileges
4 afforded to me under the Fifth Amendment to the
5 United States Constitution.

6 Q. In prior statements, sir, you have
7 described finding Sara leaning forward at a
8 45-degree angle and also standing straight up.
9 Which is it, sir, and what is your testimony here
10 today?

11 A. I respectfully decline to answer any
12 questions today under the rights and privileges
13 afforded to me under the Fifth Amendment to the
14 United States Constitution.

15 Q. Mr. Colucci, the autopsy documents
16 abrasions and contusions on Sara's arms, elbow,
17 both knees and right foot. How did Sara get those
18 injuries that afternoon?

19 A. I respectfully decline to answer any
20 questions today under the rights and privileges
21 afforded to me under the Fifth Amendment to the
22 United States Constitution.

23 (Plaintiff's Exhibit No. 7, SLED DNA
24 analysis, was marked for identification.)

25 BY MR. SMOOT:

1 Q. I'll mark this as Exhibit 7, Mr.
2 Colucci. It's a SLED DNA analysis. A clump of
3 Sara's hair was found wrapped around the garden
4 hose at 2206 North Main Street, and her DNA
5 matched the hair on the hose according to SLED's
6 DNA analysis. How does hair become wrapped around
7 a hose if she simply slipped a loop over her own
8 head, sir?

9 A. I respectfully decline to answer any
10 questions today under the rights and privileges
11 afforded to me under the Fifth Amendment to the
12 United States Constitution.

13 Q. Mr. Colucci, Sara had dirt and mud on
14 the back of her left hand, her ring finger and
15 both palms; her left little fingernail was
16 missing. A broken acrylic fingernail was found on
17 the floor of the vehicle that you all arrived to
18 the property location in. Are you able to testify
19 today as to any of those conditions that I've just
20 described?

21 A. I respectfully decline to answer any
22 questions today under the rights and privileges
23 afforded to me under the Fifth Amendment to the
24 United States Constitution.

25 Q. At the scene, sir, SLED documented two

1 recent abrasions on the knuckles of your left
2 hand, with skin still moist and attached, a
3 swollen right lower lip, and abrasions on both
4 biceps and the inside of your left arm. How did
5 you get those injuries on May 20th, 2015?

6 A. I respectfully decline to answer any
7 questions today under the rights and privileges
8 afforded to me under the Fifth Amendment to the
9 United States Constitution.

10 (Plaintiff's Exhibit No. 8, Statements,
11 was marked for identification.)

12 BY MR. SMOOT:

13 Q. Mr. Colucci, what I've marked as
14 Plaintiff's Exhibit 8 to your deposition, today,
15 sir, is a composite selection of voluntary
16 statements taken by law enforcement. Sir, did you
17 tell Barbara Moore that something happened to Sara
18 in the car on you all's way to 2206 North Main
19 Street, Summerville, on May 20th, 2015?

20 A. I respectfully decline to answer any
21 questions today under the rights and privileges
22 afforded to me by the United States -- under the
23 Fifth Amendment of the United States Constitution.

24 Q. After Sara died, did you tell Ms. Moore
25 that you ran to Sara in the pouring rain; is that

1 your testimony here today?

2 A. I respectfully decline to answer any
3 questions today under the rights and privileges
4 afforded to me under the Fifth Amendment to the
5 United States Constitution.

6 Q. Did you later tell Barbara Moore, sir,
7 that you weren't sure if Sara tripped and fell
8 into the hose?

9 A. I respectfully decline to answer any
10 questions today under the rights and privileges
11 afforded to me under the Fifth Amendment to the
12 United States Constitution.

13 Q. Did you describe Sara to Barbara at one
14 point as leaning back against the building and at
15 another point as leaning forward at a 45-degree
16 angle?

17 A. I respectfully decline to answer any
18 questions today under the rights and privileges
19 afforded to me under the Fifth Amendment to the
20 United States Constitution.

21 Q. When Barbara pressed you on how you
22 could have never taken your eyes off of Sara at
23 2206 North Main Street in Summerville, yet not see
24 her with a hose around her neck, did you raise
25 your voice and say, Well, that's what happened?

1 Is that your testimony, sir?

2 A. I respectfully decline to answer any
3 questions today under the rights and privileges
4 afforded to me under the Fifth Amendment to the
5 United States Constitution.

6 Q. Did you ask Barbara Moore whether she
7 thought you killed Sara, sir?

8 A. I respectfully decline to answer any
9 questions today under the rights and privileges
10 afforded to me under the United States
11 Constitution.

12 MR. SMOOT: We'll mark, John, as
13 Plaintiff's Exhibit 9, supplemental law
14 enforcement reports, taking statements from a
15 variety of individuals, specifically Mr. Shane
16 Sandusky.

17 (Plaintiff's Exhibit No. 9, Supplemental
18 Reports, was marked for identification.)

19 BY MR. SMOOT:

20 Q. Mr. Colucci, did you tell Shane Sandusky
21 that Sara squeezed between the fence post and the
22 building when you got to 2206 North Main Street in
23 Summerville, that you went looking for her, and
24 that she hung herself at the fence; is that your
25 testimony, sir?

1 A. I respectfully decline to answer any
2 questions today under the rights and privileges
3 afforded to me under the Fifth Amendment to the
4 United States Constitution.

5 Q. I'll mark as Plaintiff's Exhibit 10 --
6 it appears to be a copy of a memorandum from
7 special investigator Valerie Williams regarding
8 Kevin Bilbro.

9 (Plaintiff's Exhibit No. 10, Memo
10 regarding Kevin Bilbro by SI Valerie Williams, was
11 marked for identification.)

12 BY MR. SMOOT:

13 Q. Sir, do you know Kevin Bilbro; and if
14 so, did you discuss Sara's death with him?

15 A. I respectfully decline to answer any
16 questions today under the rights and privileges
17 afforded to me under the Fifth Amendment to the
18 United States Constitution.

19 Q. In one version, you told Bilbro you were
20 in the car on the phone and looked up; in another
21 version, you told Bilbro that you were drinking
22 and nodded off; in a third version, you told
23 Bilbro that you had got out of the car and went to
24 the other side of the building -- of the Gold
25 Standard at 2206 North Main Street in Summerville.

1 Which version, sir, is true, and what is your
2 testimony as to what you told him regarding Sara's
3 death today?

4 A. I respectfully decline to answer any
5 questions today under the rights and privileges
6 afforded to me under the Fifth Amendment to the
7 United States Constitution.

8 Q. To EMS first responders, sir, you said
9 that you stayed at the car; you saw her not moving
10 and found her hanging. Is that true today?

11 A. I respectfully decline to answer any
12 questions today under the rights and privileges
13 afforded to me under the Fifth Amendment to the
14 United States Constitution.

15 Q. In the days and weeks after Sara's
16 death, sir, did you tell Barbara Moore that you
17 took a polygraph that was inconclusive and
18 couldn't be used in court?

19 A. I respectfully decline to answer any
20 questions today under the rights and privileges
21 afforded to me under the Fifth Amendment to the
22 United States Constitution.

23 Q. In the week before Sara's death, Mr.
24 Colucci, was Sara planning your daughter's
25 graduation and a graduation party; was she also

1 shopping for a dress for the girls in the days
2 before her death?

3 A. I respectfully decline to answer any
4 questions today under the rights and privileges
5 afforded to me under the Fifth Amendment to the
6 United States Constitution.

7 Q. On May 19th and 20th, was Sara arranging
8 to move furniture and boxes into a warehouse,
9 making plans for the following days?

10 A. I respectfully decline to answer any
11 questions today under the rights and privileges
12 afforded to me under the Fifth Amendment to the
13 United States Constitution.

14 Q. Would you agree, sir, that multiple
15 people who knew and were close with Sara,
16 neighbors, friends and her mother, did not believe
17 that Sara was suicidal?

18 A. I respectfully decline to answer any
19 questions today under the rights and privileges
20 afforded to me under the Fifth Amendment to the
21 United States Constitution.

22 (Plaintiff's Exhibit No. 11, Photograph
23 of car and property, was marked for
24 identification.)

25 BY MR. SMOOT:

1 Q. All right. Mr. Colucci, what I've
2 marked as Plaintiff's Exhibit 11 to your
3 deposition today is a photograph taken by law
4 enforcement of the property location on May 20th,
5 2015. In that photograph are depicted a number of
6 things, one of which is the vehicle, I believe,
7 that you and Sara arrived to the property in.
8 Another one, I believe, is the second gate at the
9 property that we've already discussed about today.

10 Sir, my question for you is, is that the
11 location of your vehicle in proximity to Sara's
12 body that you see depicted on the left side of the
13 photograph there?

14 A. I respectfully decline to answer any
15 questions today under the rights and privileges
16 afforded to me under the Fifth Amendment to the
17 United States Constitution.

18 Q. Would you agree that at the time that
19 you and Sara Colucci arrived to the property that
20 day, that it was still light outside?

21 A. I respectfully decline to answer any
22 questions today under the rights and privileges
23 afforded to me under the Fifth Amendment to the
24 United States Constitution.

25 Q. Would you agree that the proximity or

1 position of Sara's body, as depicted in this
2 photograph, to the vehicle is approximately 20
3 feet and provides a clear, unobstructed view of
4 that location from where the vehicle is positioned
5 in this photograph?

6 A. I respectfully decline to answer any
7 questions today under the rights and privileges
8 afforded to me under the Fifth Amendment to the
9 United States Constitution.

10 (Plaintiff's Exhibit No. 12, Photograph,
11 was marked for identification.)

12 BY MR. SMOOT:

13 Q. Mr. Colucci, another photograph from law
14 enforcement from the day of Sara's death. This
15 photograph, in addition to depicting Sara's body,
16 also depicts a cinder block right there next to
17 her body. Mr. Colucci, at any point in time did
18 you move, alter or touch that concrete cinder
19 block depicted in Plaintiff's Exhibit 12?

20 A. I respectfully decline to answer any
21 questions today under the rights and privileges
22 afforded to me under the Fifth Amendment to the
23 United States Constitution.

24 Q. At any point in time, Mr. Colucci, did
25 you touch, manipulate, move or chain -- change the

1 position of the garden hose depicted in
2 Plaintiff's Exhibit --

3 A. I respectfully decline to answer any
4 questions today under the rights and privileges
5 afforded to me under the Fifth Amendment to the
6 United States Constitution.

7 Q. And to be clear, did you touch, change,
8 or manipulate that garden hose in any way, shape
9 or form before Sara Colucci died?

10 A. I respectfully decline to answer any
11 questions today under the rights and privileges
12 afforded to me under the Fifth Amendment to the
13 United States Constitution.

14 Q. Mr. Colucci, would you agree that
15 placing your hands or a ligature on Sara's neck
16 would put her in reasonable fear of bodily harm?

17 A. I respectfully decline to answer any
18 questions today under the rights and privileges
19 afforded to me under the Fifth Amendment to the
20 United States Constitution.

21 Q. Sir, I want to briefly go back to the
22 photograph depicting your vehicle, which I believe
23 is Plaintiff's 11 to your deposition in this case.
24 At any point in time, Mr. Colucci, did you change
25 or move the gate depicted in this photograph

1 before Sara's death?

2 A. I respectfully decline to answer any
3 questions today under the rights and privileges
4 afforded to me under the Fifth Amendment to the
5 United States Constitution.

6 Q. Would you agree, sir, that compressing a
7 person's neck is a forcible, harmful contact?

8 A. I respectfully decline to answer any
9 questions today under the rights and privileges
10 afforded to me under the Fifth Amendment to the
11 United States Constitution.

12 Q. Sara was the mother of Bishop, Mr.
13 Colucci, your adopted daughter. Describe the
14 relationship between Sara and Bishop, their bond,
15 their time together, what Sara provided to her.

16 A. I respectfully decline to answer any
17 questions today under the rights and privileges
18 afforded to me under the Fifth Amendment to the
19 United States Constitution.

20 Q. After Sara's death, sir, was Bishop
21 exposed to domestic violence and/or drug use in
22 your household between July of 2015 and May of
23 2016?

24 A. I respectfully decline to answer any
25 questions today under the rights and privileges

1 afforded to me under the Fifth Amendment to the
2 United States Constitution.

3 Q. Sir, do you contend that you bear no
4 responsibility, civil or otherwise, for Sara's
5 death?

6 A. I respectfully decline to answer any
7 questions today under the rights and privileges
8 afforded to me under the Fifth Amendment to the
9 United States Constitution.

10 (Pleading's Exhibit No. 13, Death
11 Certificate, was marked for identification.)

12 MR. SMOOT: I'll mark as 13 --

13 BY MR. SMOOT:

14 Q. What we've marked as Pleading's Exhibit
15 13, Mr. Colucci, to your deposition today, is
16 Sara's death certificate. Sir, do you recognize
17 this document? And did you provide any of the
18 information reflected on it or review it after it
19 was issued?

20 A. I respectfully decline to answer any
21 questions today under the rights and privileges
22 afforded to me under the Fifth Amendment to the
23 United States Constitution.

24 Q. Do you agree that it lists the cause of
25 death as asphyxia by neck compression and the

1 manner of death as undetermined?

2 A. I respectfully decline to answer any
3 questions today under the rights and privileges
4 afforded to me under the Fifth Amendment to the
5 United States Constitution.

6 Q. Sir, is there anything about your
7 multiple accounts of May 20th, 2015, that you wish
8 to correct, add or supplement before we conclude
9 today?

10 A. I respectfully decline -- I respectfully
11 decline to answer any questions today under the
12 rights and privileges afforded to me under the
13 Fifth Amendment to the United States Constitution.

14 MR. SMOOT: All right, sir. No more
15 questions from the plaintiff.

16 MR. GENTRY: Nothing from the defense.

17 THE VIDEOGRAPHER: This concludes the
18 video deposition of Michael F.A. Colucci. The
19 time is 10:51, and we are off the record.

20 (The deposition concluded at 10:51 a.m.)
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C E R T I F I C A T E

STATE OF SOUTH CAROLINA:

COUNTY OF CHARLESTON:

I, EVE WILBANKS, Registered Professional Reporter and Notary Public, State of South Carolina at Large, certify that I was authorized to and did stenographically report the foregoing deposition; and that the transcript is a true record of the testimony given by the witness.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

WITNESS MY HAND AND OFFICIAL SEAL this 26th day of July, 2026, in the City of Charleston, County of Charleston, State of South Carolina.



Eve Wilbanks,
Registered Professional Reporter
and Notary Public

My commission expires:
October 3, 2034



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