

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA IN AND FOR PINELLAS COUNTY

22-09348-CF-T
522022CF009348000APC

STATE OF FLORIDA

v.

LEAVING THE SCENE OF A CRASH
INVOLVING DEATH

JUAN ARIEL MOLINA-SALLES
PID: 312000026

NOTICE OF INTENT TO OFFER RECORDS
OF REGULARLY CONDUCTED BUSINESS
ACTIVITY BY CERTIFICATION OR DECLARATION

Comes now, BRUCE BARTLETT, State Attorney for the Sixth Judicial Circuit of Florida, and files this Notice of Intent to Offer Records of Regularly Conducted Business Activity as shown by Certification or Declaration in accordance with Florida Statutes 90.803(6)(a) and (c) and 90.902(11) for the following records which are available for examination at the State Attorney's Office:

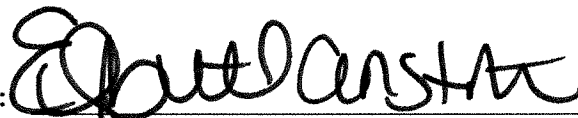
1. Ring Power Records Re ESW22-1119
2. AT&T Records 865-900-7086
3. T-Mobile Records 754-802-6871
4. Verizon Records 386-515-5926

I HEREBY CERTIFY that a copy of the above has been furnished to JOHN NOHLGREN, Assistant Public Defender, PUBLIC DEFENDERS OFFICE, 14250 49TH STREET NORTH, CLEARWATER, FL 33762, pubdef-efiling@co.pinellas.fl.us, by e-service or personal service or U.S. Mail this 5th day of

January, 2023.

BRUCE BARTLETT, State Attorney
Sixth Judicial Circuit of Florida

By:



Elizabeth Constantine
Assistant State Attorney
Bar No. 104954
eservice@flsa6.gov
P.O. Box 17500
Clearwater, Florida 33762-0500
(727) 464-6221

[NOTO]



AT&T
11760 US HWY 1, SUITE 300
NORTH PALM BEACH FL 33408

(800) 635-6840
(888) 938-4715 (Fax)

CERTIFICATE OF AUTHENTICITY OF DOMESTIC RECORDS PURSUANT TO FEDERAL
RULES OF EVIDENCE 902(11) AND 902(13)

GLDC FILE NUMBER: 3531149

I, Endy Maldonado, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by AT&T, and my title is Legal Compliance Analyst. I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of AT&T. I further state that:

a. All records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of AT&T, and they were made by AT&T as a regular practice; and

b. Such records were generated by AT&T's electronic process or system that produces an accurate result, to wit:

1. The records were copied from electronic device(s), storage medium(s), or file(s) in the custody of AT&T in a manner to ensure that they are true duplicates of the original records; and

2. The process or system is regularly verified by AT&T, and at all times pertinent to the records certified here the process and system functioned properly and normally.

I further state that this certification is intended to satisfy Rules 902(11) and 902(13) of the Federal Rules of Evidence.

Endy Maldonado

09-23-2022
Date



Law Enforcement Relations

4 Sylvan Way, Parsippany, N.J. 07054

Phone: (973) 292-8911 Fax: (973) 292-8697

October 20, 2022

T-Mobile / MetroPCS Tracking ID: 4065347

I, Linard Anderson, attest, under penalty of perjury under the laws of the United States of America pursuant to 28 U.S.C. Section 1746, that the information contained in this declaration is true and correct. I am a United States citizen and am over eighteen years of age. I am employed by T-Mobile US, Inc. (hereinafter, "the Company") as a custodian of records and therefore am qualified as a result of my position to make this declaration. My official title is Custodian of Records.

I certify that all of the records described below and attached hereto are duplicates of the original and are true and complete copies of records maintained by the Company. Said records consist of several electronic files produced in T-Mobile US, Inc. Case No.4065347 in response to a lawful request issued to the company.

Description of records:

Identifier	Start Date	End Date	Requested Item
7548026871	09/21/2022	09/23/2022	Call Details No Cells
7548026871	09/21/2022	09/23/2022	Subscriber Info

I further state that:

- A) Such records were made at or near the time of the occurrence of the matters set forth by (or from information transmitted by) a person with knowledge of those matters;
- B) Such records were kept in the course of regularly conducted business activity;
- C) The business activity made such records as a regular practice; and
- D) If such record is not the original, such record is a duplicate of the original.

This certification is intended to satisfy Rules 803(6), 902(11), 902(13) and / or 902(14) of the Federal Rules of Evidence and / or any state equivalents.

I hereby certify that the foregoing statement made by me is true. I understand that if any of the statements made by me herein are willfully false, I am subject to punishment.

Sincerely

Law Enforcement Relations Group



VERIZON SECURITY SUBPOENA COMPLIANCE

180 WASHINGTON VALLEY ROAD

BEDMINSTER NJ 07921

Phone: 800-451-5242 Fax:888-667-0028

October 25, 2022

STATE ATTORNEY PASCO & PINELLAS COUNTIES
14250 49TH ST N RM 1000
CLEARWATER FL 33762

Verizon Case #: 22464249
Docket / File #: SO22305232

State of New Jersey

ss:

County of Somerset

I, WALTER DECKER, being duly sworn, depose and say:

I am the custodian of records for Verizon, and in that capacity, I certify that the attached records are true and accurate copies of the records created from the information maintained by Verizon in the actual course of business. It is Verizon's ordinary practice to maintain such records, and that said records were made contemporaneously with the transaction and events stated therein, or within a reasonable time thereafter.

/s/ WALTER DECKER

Certification following USCS Federal Rules of Evidence Rule 902 & 803.

ESW22-1119 Affidavit

I, Shane C. Gill, am an official custodian of business records
of

Ring Power Corporation
500 World Commerce Parkway
St. Augustine, FL 32092

The attached documents are described as follows:

ACCOUNT: Caterpillar Small Wheel Loader, Model 930M,
with a Product Identification Number listed as
CAT0930MCKTG04741

BEGINNING DATE: September 22, 2022 at 0000 hours (ET)

ENDING DATE: September 22, 2022 at 2359 hours (ET)

- "Telematics" data associated with the account/vehicle,
including location data, hours of operation, running
history, customized health reports, utilization reports,
enhanced mapping and other equipment management data
recorded and stored from September 22, 2022 at 0000 hours
(ET) to September 22, 2022 at 2359 hours (ET).

ITEMS TO BE SEIZED

All information particularly described in Section II of
Attachment A that constitutes evidence of violations of Chapter
316.027, Leaving the Scene of a Crash Involving Death Florida
Statute(s), including, for each account or identifier listed in

ESW22-1119 Affidavit

Section I of Attachment A, information pertaining to the following matters:

- a. The identity of the person(s) who created or used the account, including records that help reveal the whereabouts of such person(s);
- b. Evidence indicating how and when the account was accessed or used, to determine the chronological and geographic context of account access, use and events relating to the crime under investigation and the account subscriber;
- c. Evidence indicating the subscriber's state of mind as it relates to the crime under investigation; and
- d. Evidence that may identify any co-conspirators or aiders and abettors, including records that help reveal their whereabouts.

The business records submitted in this case were made at or near the time of, by or from information transmitted by a person with knowledge and/or involved in the transmission of the information.

ESW22-1119 Affidavit

The business records are kept in the normal course of a regularly conducted business activity, and it is the regular practice of the business/agency to make these records.

The business records submitted in this case are not available to the public for changing, modifying, or tampering.

The business records submitted in this case fairly and accurately duplicate the original records maintained by this business/agency, and are submitted by certification in accordance with Florida Statute 92.605 and Florida Evidence Code Chapter 90.803(6)(a) and (c) and 90.902(2).

The foregoing instrument was acknowledged before me this 2nd day of December, 2022 by Shane Gill, who is personally known to me or has produced _____ as identification and who did take an oath.

Name: Shane Gill
Signature: [Handwritten Signature]

[Handwritten Signature]
NOTARY PUBLIC



MELISSA PERDUE
Notary Public
State of Florida
Comm# HH284773
Expires 7/6/2026