

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

CIVIL DIVISION CASE NO.: 22-09348-CF

State of Florida

-vs-

Juan Ariel Molina-Salles,  
Defendant.

-----  
VIDEO TELECONFERENCE DEPOSITION OF  
ALLEN AMADOR

TAKEN BY: Attorney for the Defendant  
DATE TAKEN: Tuesday, August 20, 2024  
TIME: Commencing at 9:38 a.m.

Examination of the witness taken before:

ANDY SHAFFER, CER  
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Executive Reporting Service

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APPEARANCES: (All appearances via Zoom)

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ALSO PRESENT: MARISOL HEGG - INTERPRETER

I N D E X

	PAGE
Direct Examination by Ms. DeLiberato	3
Certificate of Oath	25
Certificate of Transcriptionist	26

1 THEREUPON,

2 MARISOL HEGG

3 was adduced as the interpreter herein, and being first  
4 duly sworn upon oath, did interpret the testimony as  
5 follows:

6 THE INTERPRETER: I do.

7 THEREUPON,

8 ALLEN AMADOR

9 was adduced as the witness herein, and being first duly  
10 sworn upon oath, was questioned and testified as  
11 follows:

12 THE WITNESS: Yes.

13 THE REPORTER: Thank you.

14 DIRECT EXAMINATION

15 BY MS. DELIBERATO:

16 Q. Good morning, Mr. Amador, my name is Maria  
17 DeLiberado. I'm an Assistant Public Defender, and I  
18 represent Juan Molina-Salles. And present for the  
19 State Attorney is Liz Traverso, covering for Elizabeth  
20 Constantine, who's the prosecutor in this case.

21 Have you ever given a deposition before?

22 A. No.

23 Q. So the most important thing is to answer out  
24 loud yes or no instead of shaking your head yes or no,  
25 things like that. And if you don't understand a

1 question that I ask you, please ask me to repeat it.

2 A. Okay.

3 Q. And we have the interpreter here, so I'll  
4 talk slowly and let her fully translate and translate  
5 your answers, okay?

6 A. Okay.

7 Q. Did you review anything before our deposition  
8 today? Any documents or have any conversations with  
9 anybody before this deposition?

10 A. No. Only the officers. They arrived to my  
11 house asking for the case, yes.

12 Q. Was that with the subpoena for the  
13 deposition?

14 A. No. It was sent to the mail.

15 Q. Okay. When did you talk to the police? Are  
16 you talking back at the time this happened in 2022?

17 A. Yes. When this happened, they arrived to my  
18 house, and when I was trying to -- when I was leaving  
19 from my house, they detained me.

20 Q. Okay. But when was that?

21 A. The day that he was detained, I just do not  
22 remember the date or the time or -- but if you may have  
23 the date of it, that was the time when he was detained.

24 Q. Okay. So at the same time that he got  
25 arrested for this crime, they stopped you as well?

1 A. Yes. They spoke with me.

2 Q. Since that time, have you spoken to anybody  
3 about this particular case in a deposition like this or  
4 anything else?

5 A. No.

6 Q. Okay. Where do you live right now?

7 A. Tampa.

8 Q. And is it the same place you were living at  
9 the time where -- when Juan was arrested?

10 A. Yes. We could say that it is but it's in  
11 another street. It's about five to ten minutes away  
12 from there.

13 Q. Okay. How long have you lived in Tampa?

14 A. Two years.

15 Q. Where did you live before that?

16 A. In Bradenton, where the subpoena arrived.

17 Q. Okay. Can you give me your address in Tampa?

18 A. I don't remember the address, but it is in  
19 Columbus. Just give me a second. Can you see it here?

20 Q. Yep. 3228 West Saint Conrad Street, 33607.

21 Got it.

22 THE INTERPRETER: You got it, Ms.?

23 MS. DELIBERATO: I do, yes. Thank you.

24 THE INTERPRETER: Okay.

25 BY MS. DELIBERATO:

1 Q. How long have you lived in the United States?

2 A. Three years.

3 Q. And has all of that time been in Florida?

4 A. Yes.

5 Q. And where were you born?

6 A. In Honduras. Tegucigalpa.

7 Q. Okay. How old are you?

8 A. 34.

9 Q. And this is a question that I ask of  
10 everybody. It's not meant to embarrass you at all.

11 Have you ever been arrested for anything?

12 A. No.

13 Q. Do you know Juan Molina-Salles?

14 A. Yes.

15 Q. How do you know him?

16 A. We used to be co-workers in Honduras.

17 Q. When did you first meet him?

18 A. Here or in Honduras?

19 Q. In Honduras.

20 A. Could be around ten years, somewhere around  
21 there.

22 Q. And what was the construction company in  
23 Honduras that you worked for?

24 A. The name was SERMACO.

25 Q. Can you spell it?

1           A.    The spelling is S as in Sam, E as in Edward,  
2 R as in Richard, M as in Mary, A as in apple, C as in  
3 cat, O as in Oscar.

4           Q.    What did Juan do for SERMACO?  What was his  
5 job?

6           A.    He was machine operator.

7           Q.    Did he operate a front loader type machine?

8           A.    Yes.

9           Q.    And you right now I can see have a  
10 construction vest on.  Where are you working now?

11          A.    I work here in a company for a contractor.

12                   MS. DELIBERATO:  I couldn't hear you, madam  
13 interpreter.

14          A.    I work here in a company under a contractor.

15 BY MS. DELIBERATO:

16          Q.    What is the company's name?

17          A.    Just one second, please.  Can I find out the  
18 name for you later?  Because I was hired by a friend of  
19 mine that he's a contractor.  He was hired by a  
20 company.

21          Q.    Okay.  I guess what I really want to know is  
22 who do you like -- who signs your paychecks?  Who do  
23 you work for?

24          A.    I will have to find out for you that  
25 information.  I don't know if you can give me a

1 WhatsApp number and then I can send those to you.

2 Q. I can do that. Did you ever work for Archer  
3 Western Construction?

4 A. Yes.

5 Q. So let me back up a little bit. You knew  
6 Juan in Honduras and you met at work. Did you also  
7 socialize together?

8 A. Yes, we were co-workers. We shared an  
9 apartment.

10 Q. In Honduras?

11 A. Yes, Honduras.

12 Q. Did you know -- did you ever meet his  
13 children or the mother of his children?

14 A. No. Because mainly we work just together  
15 only at work, because we used to work like outside like  
16 in another state like for two to three months. Outside  
17 of the house.

18 Q. Okay. Who came to the United States first?  
19 You or Juan?

20 A. I did.

21 Q. Did you stay in contact with Juan when he was  
22 in Honduras?

23 A. Yes. Through Messenger.

24 Q. When you first came to the United States, is  
25 that when you worked for Archer Western?



1 A. Yes.

2 Q. And what were you doing for Archer Western?

3 A. Pilot. I was working as a pilot.

4 Q. What does that mean?

5 THE INTERPRETER: I'm sorry. I'm not getting  
6 the position.

7 BY MS. DELIBERATO:

8 Q. Yeah, me neither. Can you describe your job,  
9 the work that you did?

10 THE INTERPRETER: He's trying to look up the  
11 spelling for it. So far I got P-A-L-I and I'm  
12 assuming the next word is driver.

13 MS. DELIBERATO: Yeah. I'm just trying to  
14 find out what he did.

15 THE INTERPRETER: He said what he does in  
16 that position was to put in a pilot for a bridge.

17 BY MS. DELIBERATO:

18 Q. Okay. So do you drive a machine?

19 A. No.

20 Q. You just like physically use your arms to put  
21 things in the ground? I'm just trying to understand  
22 what you do.

23 THE INTERPRETER: He said that yes, that's  
24 what he was doing. He said just only to put  
25 pilot, and it will come out okay.

1 BY MS. DELIBERATO:

2 Q. How did you hear about Archer Western? How  
3 did you get that job?

4 A. It was a friend of mine who find this job.

5 Q. Who is that friend? What's his name?

6 A. Of my friend?

7 Q. Yes.

8 A. Okay. His name is Obet Zelaya. O-B-E-T.  
9 Last name is Z-E-L-A-Y-A.

10 Q. And when did you start working for Archer  
11 Western?

12 A. It could be about three years. I just -- the  
13 date it doesn't stuck in my memory. So it could be  
14 around three years.

15 THE INTERPRETER: Madam DeLiberato, I found  
16 in the Web, and it is pilot driver. It says here  
17 pilot car driver works in a construction with the  
18 driver of oversized truck load to make sure the  
19 truck reaches its destination safely.

20 MS. DELIBERATO: Okay. That's very helpful.

21 THE INTERPRETER: I'm sorry if I went over my  
22 limits, but I was trying to figure out myself,  
23 too.

24 MS. DELIBERATO: You're perfect.

25 THE INTERPRETER: Thank you.

1 BY MS. DELIBERATO:

2 Q. So, was the Archer Western job the first job  
3 you had when you came to the United States?

4 A. I was three months working in house  
5 constructions. What it is is that I do not remember  
6 the names of the companies. And then after, that's  
7 when I started working for Archer Western.

8 Q. And when did you stop working for Archer  
9 Western?

10 A. I believe about a year. A year and something  
11 somewhere.

12 Q. Were you working at Archer Western the same  
13 time that Juan was when this accident happened?

14 A. Yes.

15 Q. And did you continue working for them after?

16 A. Yes, a little bit more.

17 Q. And you were not working the night of the  
18 accident. Is that correct?

19 A. No.

20 Q. So you came to the United States first, and  
21 then you were working in Archer Western. How did Juan  
22 come -- how did Juan come to start working at Archer  
23 Western, if you know?

24 A. Well since we were sending Messenger to each  
25 other, so he told me to help out for him to work at

1 Archer Western.

2 Q. Okay. And so did you do that? Did you  
3 connect him to Archer Western so that he could come  
4 here and get a job?

5 A. Yes.

6 Q. And when --

7 A. Yes, but he was working in Tennessee before  
8 that.

9 Q. Before that he was working where at?

10 A. In Tennessee.

11 Q. Okay. But when he came to Florida, that's  
12 when he worked for Archer Western?

13 A. Yes.

14 Q. And did he live with you in Tampa?

15 A. Yes.

16 Q. Do you know when he came to live with you in  
17 Tampa?

18 A. Like I said, I'm not good with dates or  
19 memorizing dates or something like that, but it was  
20 probably about six to seven months after the accident.

21 Q. Before the accident?

22 A. Yes.

23 Q. Okay. And who lived with you?

24 A. Only me and Juan.

25 Q. Okay. Did you guys work the same shift at

1 Archer Western? Did you work at the same time?

2 A. No, the times were changed. Like one in the  
3 morning. I mean, one during the day, one during the  
4 nighttime.

5 Q. And who worked during the day and who worked  
6 at night?

7 A. It was random. Where their shift, the time  
8 shift, one could be -- it could be like one in the  
9 morning, one in the -- I'm sorry, I keep saying  
10 morning. One in a day and one at a night shift, but  
11 they were switching shifts.

12 Q. Okay. Were you working at Archer Western  
13 when there was like a construction accident and  
14 somebody got hurt a couple of months before this  
15 accident?

16 A. The one who died in the accident?

17 Q. So my understanding is before the accident  
18 involving the police officer, there was an accident  
19 involving a construction worker who died.

20 A. Yes. That was the job that I was doing.

21 Q. Okay. Can you tell me what happened?

22 A. The --

23 Q. Crane.

24 THE INTERPRETER: Crane. Yes. Sorry. Thank  
25 you.

1           A.    He was working in the crane, so that was --  
2 did a lot of pressure in the pilot. So he was working  
3 with soil, and then a pow, it broke. So that's when  
4 that strike this person. And that's when this person  
5 got killed.

6 BY MS. DELIBERATO:

7           Q.    Were the police ever called to investigate  
8 that?

9           A.    No. Because that was not on my shift.

10          Q.    Okay. Did anybody ever talk to you about  
11 that incident, ask you any questions, or anything like  
12 that?

13          A.    No.

14          Q.    Was there any kind of government  
15 investigation? Did anybody come and say what happened?  
16 Any kind of safety checks or anything like that after  
17 that death?

18          A.    No that I can remember, no.

19          Q.    Okay. So I want to ask you now about the  
20 night of the accident where the police officer was  
21 killed, okay?

22          A.    Okay.

23          Q.    Did you work that day during the day shift?

24          A.    Yes.

25          Q.    What time did you work?

1           A.    It was from 6 to 1:00 in the afternoon.  And  
2 then we went back at nighttime because we were invited  
3 from the company to have dinner to eat.

4           Q.    Okay.  And then when did you go back home to  
5 Tampa?

6           A.    I went back late because due to the accident,  
7 so it take longer.  And then Ariel called me, so it was  
8 around 12 midnight to 1:00 in the morning.

9           Q.    Okay.  So I want to back you up a little bit.  
10 Were you there when the accident happened or were you  
11 at home in Tampa?

12          A.    We were already off from work and we were  
13 close from the workplace because we were eating.

14          Q.    When you say we, who's we?

15          A.    The group of the company.  We all went to  
16 eat.

17          Q.    But Juan wasn't with you because he was  
18 working, right?

19          A.    He arrived where we were for a little while.

20          Q.    Okay.  But then did he go back to work?

21          A.    Yes.  He was there about an hour or something  
22 like that.

23          Q.    How did you and Juan get to work?  Did you  
24 have a car?

25          A.    Yes.  He does.  He did too.

1 Q. You each had your own car?

2 A. Yes.

3 Q. When you were working the night shift  
4 sometimes, did you ever have occasion to see the  
5 deputies that would work the construction site?

6 A. Yes. I always see them, the officers.

7 Q. Do they -- if they're working the  
8 construction detail, do they usually stay inside their  
9 cars?

10 A. They should be inside of their cars.

11 Q. And if they're not inside their cars, are  
12 they supposed to be wearing a reflective vest like the  
13 one you're wearing?

14 A. And headlights, too. They should be wearing.

15 Q. Okay. So a vest and a headlight?

16 A. Yes. The vest, yes.

17 Q. Okay. So can you tell me how you first  
18 learned that there was a deputy involved in an accident  
19 that night? How did you first hear about it?

20 A. I didn't know at first. I didn't know  
21 anything about an accident. The first moment that I  
22 knew was because Ariel called me and he told me that he  
23 was in trouble or trouble had happened, but he was very  
24 worried. But then I said to him, "Where are you?" So  
25 I asked him to send me the location where he was



1 because I was thinking that he may have trouble with  
2 the car or something happened with the car. That's  
3 what I thought at the moment.

4 Q. And you said he was upset. Can you tell me  
5 what he sounded like?

6 A. Well, when he called me, like I said, he  
7 sound worried. He was worried about it. And when he  
8 called me, he said that accident had happened, and like  
9 I said, you can hear that he was worried. And I said  
10 to him, "Send me the location." So I went in my car.  
11 So when I arrived there with my car, that's when I  
12 found out that officers were involved.

13 Q. How did you find that out? Did you see the  
14 officer or did you just see all the police cars?

15 A. Well, when he -- like I said, when he sent to  
16 me the address, I passed over the address. So when I  
17 passed, that's when I saw the officers, I saw  
18 firefighters, I saw police cars, and I saw all that.  
19 So then when I turned around to the location, I was  
20 thinking in my head, this could not be Ariel. I  
21 couldn't imagine that that was something that Ariel --  
22 it could happen with him.

23 Q. Okay. Why not? Why did you -- why were you  
24 surprised by that?

25 A. Well first of all, because I said -- I mean

1 with an official officer, it is a big trouble. It's a  
2 big issue if officer is involved or something. So I  
3 couldn't really imagine that it could have been him  
4 because I know him, that he's a good operator. So it  
5 just didn't cross my mind.

6 Q. And then did you -- at some point, did Juan  
7 ask you to pick him up? And what did you tell him?

8 A. Yes. He told me to pick him up right when I  
9 were -- right when I passed over, he told me to pick  
10 him up.

11 Q. And did you do that?

12 A. Well, at first I knew that that's what he  
13 wanted, but at the second time, I really didn't. I  
14 wanted to help him. I wanted to pick him up, but I saw  
15 it was all around, surrounded with the police, so I  
16 denied. I couldn't do that. Like I said, I tried it  
17 because I wanted to help him, but with the time and  
18 everything, I didn't.

19 Q. Was there another friend that you talked to  
20 named Papito?

21 A. Yes, Papito.

22 Q. Do you know his real name?

23 A. Francisco Parades.

24 Q. P-A-R-A-D-E-S?

25 A. Yes, ma'am.

1 Q. And did he talk to Juan as well?

2 A. I do not remember. I believe not. I think  
3 it was only with my phone.

4 Q. And I think you said Juan was worried and  
5 nervous. Is that how you would describe him?

6 A. Yes. That's how I describe him.

7 Q. Did you talk to him about going to the police  
8 or telling them what happened or anything like that?

9 A. Yes. You know, and when I was able to calm  
10 down and have -- rethinking everything what was going  
11 on like, you know, because it was ten minutes of  
12 tension. So when I was already calm, I said to him,  
13 "You better check your yourself in. Give yourself to  
14 the police."

15 Q. Okay. And what did Juan say? Did he say  
16 what he was feeling?

17 A. What he was feeling like when? Like when I  
18 was telling him to get himself in?

19 Q. Yes.

20 A. He was crying and saying to me, "What about  
21 my children and my family? I will not see them again."

22 Q. He told you it was an accident, right? Did  
23 he tell you that or did he tell you anything about the  
24 details?

25 A. No. He just said to me there was an

1 accident.

2 Q. Okay. And did you know -- and I'm not asking  
3 about your status at all, I want to be clear. Did you  
4 know that Juan was not in the country legally?

5 A. Yes.

6 Q. You knew that he was not in the country  
7 legally?

8 A. Yes.

9 Q. Did Archer Western know that?

10 A. Yes.

11 Q. So you don't pick him up. Do you go back  
12 home to Tampa?

13 A. Yes. I went back to Tampa.

14 Q. Did you talk to Juan anymore?

15 A. No. Because I think his phone ran out of  
16 charge. So I believe -- but I'm just not quite sure  
17 about the exact time, but I believe it was sometime  
18 around 2:00 a.m. in the morning that when I called him  
19 back and he was not just answering.

20 Q. The phone went right to voicemail?

21 A. Yes.

22 Q. At some point did the police come and talk to  
23 you?

24 A. Yes, in the morning.

25 Q. What did they ask you?

1           A.    In the morning, they arrived and they ask me  
2 if Ariel, in Honduras, he had a permit to drive.  
3 Because if we were aware, I was aware that here you  
4 need to have a permit to drive. And I said to him, "It  
5 was an accident." So they asked me, "How do you know  
6 this was an accident?" So I said to him, "Of course it  
7 was an accident, because who would want to do something  
8 like that."

9           Q.    And you had seen Juan drive this type of  
10 machine back in Honduras, right?

11          A.    Yes, we were.

12          Q.    And he was trained on it, right?

13          A.    Yes.

14          Q.    And you described him, I think, as a good  
15 operator?

16          A.    Yes. He was one of the best. We were one of  
17 the best operators.

18          Q.    The two of you together?

19          A.    Yes.

20          Q.    After you talked to the police, did you talk  
21 to anybody else that -- after that morning, did you  
22 talk to anybody else about this case?

23          A.    No.

24          Q.    Have you talked to Juan since he's been  
25 arrested?

1 A. Twice, I spoke to him.

2 Q. Did he call you from the jail?

3 A. Yes.

4 Q. Have you visited him on video or anything?

5 A. No.

6 Q. Are you in contact with anyone in his family  
7 back in Honduras?

8 A. Yes. Yes, with his family. And his sister  
9 came to look for me and asked me to take her, if I  
10 could take her to the company. And I took her.

11 Q. When was that?

12 A. Like I said before, with the dates, I'm not  
13 good keeping dates. But when her sister -- when his  
14 sister came to take her to the company, I would say it  
15 was like three months after the accident.

16 Q. And do you still have family in Honduras as  
17 well?

18 A. My family. My wife and my kids.

19 Q. And do they socialize or spend time with  
20 Juan's family in Honduras? Do they know each other or  
21 not?

22 A. No.

23 Q. Okay. Is there anything about that night,  
24 conversations that you had with Juan, or anything that  
25 you saw that I haven't already asked you about today?

1 A. No, we really -- we almost didn't converse a  
2 lot.

3 Q. You and Juan, you mean? That night?

4 A. I'm sorry.

5 Q. I didn't understand what you meant. You said  
6 we didn't converse that much. I don't know who "we"  
7 is?

8 A. Juan and I.

9 Q. Okay. Have you understood all the questions  
10 that I asked you today?

11 A. Yes.

12 Q. What is your telephone number? Cause I will  
13 send you a message so you can give me your company's  
14 name.

15 A. No, wait. I'm going to give you another one.

16 Q. Any one is fine and WhatsApp is fine.  
17 Whichever is easiest for you.

18 A. I'll give it to you in a second. It's a new  
19 one. 813-546-3819.

20 MS. DELIBERATO: Thank you. I don't have any  
21 more questions for you today. The court reporter  
22 has been typing down everything that we said. You  
23 get a chance to read it before he files it, but it  
24 will be in English. Do you want him to send you a  
25 copy?

1 THE WITNESS: No. That's fine. If you want  
2 to send it, you can send it through WhatsApp.

3 THE INTERPRETER: I'm sorry, Ms.

4 MS. DELIBERATO: That's fine. I don't have  
5 any further questions and the State has said they  
6 don't unless she pops on. So I'm going to assume  
7 no more questions and we'll conclude the depo.  
8 Thank you so much for your time.

9 THE WITNESS: Thank you.

10 (The deposition concluded at 10:32 a.m.)

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CERTIFICATE OF OATH

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STATE OF FLORIDA  
COUNTY OF PINELLAS

I, ANDY SHAFFER, CER the undersigned  
authority, certify that MARISOL HEGG,  
INTERPRETER, and ALLEN AMADOR, WITNESS, appeared  
before me via video teleconference and was duly sworn  
on August 20, 2024, at 9:38 a.m.

WITNESS my hand and official seal this 20th day  
of August 2024.



---

Andy Shaffer, CER  
Notary Public  
Commission: HH 410445  
Expiration: 6/14/2027



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CERTIFICATE OF TRANSCRIPTIONIST

STATE OF FLORIDA  
COUNTY OF HERNANDO

I, HANNAH LEOTA, CER, do hereby certify that I was authorized to and did transcribe the deposition of Allen Amador; that a review of the transcript was not requested; and that the foregoing transcript is a true and correct record.

I FURTHER CERTIFY that I am not a relative, employee, or attorney, or counsel 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.

DATED this 28th day of August 2024, at Hernando County, Florida.

*Hannah Leota*

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Hannah Leota, CER  
Notary Public  
Commission: HH 412991  
Expiration: 6/20/2027