

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

Case Number: 22-09348CFANO

STATE OF FLORIDA,

Plaintiff,

VS.

JUAN ARIEL MOLINA-SALLES,

Defendant.

DEPOSITION OF: SARAH ROBINSON
TAKEN BY: Counsel for the Defendant
DATE: February 9, 2024
TIME: 1:14 p.m. - 1:28 p.m.
PLACE: ZOOM videoconference
REPORTED BY: Tamara M. Pacheco, RPR
Notary Public, State of FL

Pages 1 - 19

JTP REPORTING (727) 422-8287

ZOOM VIDEOCONFERENCE APPEARANCES

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EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 SERGEANT SARAH ROBINSON

3 (was adduced as the deponent herein, and being first duly
4 sworn on oath, was examined and testified as follows:)

5 EXAMINATION

6 BY MS. DELIBERATO:

7 Q Good afternoon. Can you please state and spell
8 your name for the record.

9 A Yeah. It's Sergeant Sarah Robinson, S-A-R-A-H,
10 R-O-B-I-N-S-O-N.

11 Q Good afternoon. I'm Maria DeLiberato. I'm an
12 assistant public defender. Myself and Nichole Blaquiére
13 represent Juan Molina-Salles. We're here on PCSO case
14 number 22-305232. Ms. Constantine is here with the state
15 attorney's office.

16 I have that you authored just one supplement,
17 Supplement 123. Is that right?

18 A Correct.

19 Q No other supplements that I've missed?

20 A No.

21 Q And have you had a chance to review your
22 supplement before today?

23 A I did.

24 Q And do you have it there with you?

25 A I do.

1 Q If you need to refer to it at any time,
2 perfectly fine. Just let me know that's what you're
3 doing.

4 A Okay.

5 Q Tell me how you're employed.

6 A I'm employed as a sergeant with the Pinellas
7 County Sheriff's Office. I'm currently assigned to the
8 Robbery-Homicide Unit.

9 Q How long have you been with PCSO?

10 A I got hired in January of 2013.

11 Q Any prior law enforcement experience before
12 that?

13 A No.

14 Q During your time at PCSO, any complaints
15 sustained against you for any reason?

16 A No.

17 Q The evening of September 22nd, 2022, were you
18 working that evening?

19 A I was. I was off and got called in, so I ended
20 up working.

21 Q And you got called in to the traffic accident
22 where Deputy Hartwick was deceased. Is that right?

23 A Correct.

24 Q And where did you go when you got there?

25 A So I went -- it was at I-257 southbound near,

1 like, Exit 30 in the new section that they were building.
2 So I went there and made contact and waited for the rest
3 of my unit to get there, along with my lieutenant,
4 Lieutenant Suess.

5 Q Okay. And it was just kind of like an all hands
6 on deck. Everybody is coming in to do various tasks.
7 Obviously, it's not a robbery, but it is part of homicide.
8 You would have been called out anyway, right?

9 A Correct. As part of homicide, yeah.

10 Q Typically though you wouldn't respond to a
11 traffic crash?

12 A No. However, being a deputy involved that was
13 deceased and the nature of it, they did call our unit in.

14 Q And so you get there, and then you kind of
15 corral the rest of your unit, your detectives to come in?

16 A Correct. I do that kind of while I'm on my way,
17 call all of them, and they all start coming in from all
18 over.

19 Q And so what's happening when you're on scene?
20 Where are they in their investigation?

21 A So it's still very preliminary. Our patrol
22 units obviously were there first trying to kind of gather
23 witnesses and figure out what kind of happened. So we get
24 there. We have several employees of Archer
25 Western Construction --

1 Q It's a little hard to hear you because of the
2 wind.

3 A How's that?

4 Q That's a little better.

5 A The baby is inside and he's fussy, so I didn't
6 want to sit inside.

7 Q No worries.

8 A So Archer Western Construction employees were
9 there. So he -- they had some employees that were on
10 scene, some management employees all kind of in different
11 areas waiting for us to get there to talk to them.

12 Q Okay. And so you kind of make assignments of
13 your detectives and tell them kind of where to go and what
14 to do?

15 A Correct, I did. We also had some detectives
16 from other units that assisted, and so I kind of helped
17 coordinate a couple of them as well.

18 Q Okay. And then what were you specifically
19 tasked with doing?

20 A So I was the supervisor for the scene. So I was
21 kind of assigned with coordinating everybody, figuring out
22 kind of what was going on, as well as getting with my
23 lieutenant and the other chain of command and working
24 together to get various units involved, if necessary, and
25 investigate the incident.

1 Q Okay. Did you interview any witnesses yourself?

2 A I did not.

3 Q And it sounds like you started to work towards
4 identifying -- ultimately identifying Juan Molina-Salles
5 with an agent. Is it a US border patrol agent?

6 A Correct, Ceasar Barrientos.

7 Q And how did that come about?

8 A So we actually -- I was notified by our
9 communications center that we actually -- he had called in
10 to our communications center with possible information and
11 willing to help, so that's how we got put in touch.

12 Q Okay. And he had some information they were
13 actually at an address in Tampa, but there was potentially
14 some undocumented people potentially going to flee the
15 country. That was the tip that he had gotten?

16 A Correct. So he working with some -- to my
17 understanding with some illegal immigrants who were
18 working in the area possibly with Archer Western that he
19 was trying to coordinate. He believed that they were at
20 this address in Tampa.

21 Q Was it related to this, or that was a separate
22 investigation that he was conducting.

23 A That was a separate investigation he was
24 conducting. He just got a tip from some source that it
25 may have been -- one of those guys may have been involved

1 in our incident.

2 Q Okay.

3 A Because at that time, we were still trying to
4 identify Juan Molina-Salles.

5 Q Okay. And so did you go meet with Agent
6 Barrientos, or did he --

7 A That evening, no. We only spoke on the phone
8 that evening.

9 Q Okay. And it says you provided him with the
10 North Carolina identification card. Did you just like
11 text it to him or something?

12 A Correct. I attached it to the supplement that I
13 had sent that was provided. Lieutenant Sues gave it to
14 me after receiving it from Russell Marshall, who was an
15 employee of Archer Western.

16 Q Okay. So then was Barrientos able to positively
17 identify him as Molina-Salles or that was later after he
18 was apprehended?

19 A So originally I sent him the North Carolina ID.
20 They used their databases, and he came up with a possible
21 Juan Molina-Salles. Obviously, due to the quality, he was
22 not a hundred percent on it, but that's who he believed it
23 was. So then we -- once we ended up finding Juan
24 Molina-Salles -- our K-9 unit located him -- I then took a
25 picture of him and also sent that to Agent Barrientos, and

1 he used that better quality photo to positively identify
2 him.

3 Q Okay. Do you know anything about the
4 investigation that Agent Barrientos was conducting with
5 the Honduran nationals living in Tampa, like why he had a
6 confidential informant in there or anything like that?

7 A No.

8 Q And then did -- so was he actually at the
9 residence, the 3012 North Albany Avenue residence in
10 Tampa, or you don't know?

11 A Oh, Agent Barrientos? No. No, he was not. We
12 ended up sending our deputies out there to try and go make
13 contact before they fled if that was related.

14 Q But when you --

15 A They didn't even make it there.

16 Q Okay. So since the Tactical Surveillance Unit
17 responded and he wasn't there, were there other people
18 there, or were there no one there, or you don't know?

19 A You would have to talk to them. I wasn't there.
20 My understanding is there was other people there; however,
21 it wasn't -- he wasn't there.

22 Q Okay. And it wasn't related to anything with
23 respect to Deputy Hartwick's accident, the death?

24 A Correct. Whether they knew Juan Molina-Salles
25 or not might be a different story, but you would have to

1 talk to them about that. But whoever was there was not
2 related to our incident.

3 Q Okay. And then were you present when Juan
4 Molina-Salles was apprehended?

5 A I was present when our K-9 deputies brought him
6 out of the wooded area and placed him into a cruiser, yes,
7 but not when he was located in the wooded area.

8 Q Got it. How far from the wooded area was the
9 accident scene, if you know?

10 A I don't know. You would have to get with our
11 K-9 deputies to figure out how far they tracked him.

12 Q Did you have any contact with Mr. Molina-Salles?
13 You snapped a picture of him, but any other contact other
14 than that?

15 A That's it.

16 Q Anything you remember about his appearance, his
17 demeanor, anything like that?

18 A I remember he kind of had some like leaves and
19 stuff on him, like he was clearly in the wooded area, but
20 that's about it. I mean, I have the photo, which kind of
21 shows you what he was like as soon as they pulled him out
22 of the wooded area.

23 Q And then it looks like you found out -- you note
24 in your report that Agent Barrientos had said he had one
25 prior attempt to enter the US through Texas and Mexico.

1 A From Mexico through Texas.

2 Q But he was just like turned around at the border
3 at that point it sounds like in 2021?

4 A Yes. So they -- my understanding is they had --
5 he came through and they apprehended him, and they sent
6 him back.

7 Q So it wasn't like a deportation proceeding. He
8 hadn't been living in the US for a period of time?

9 A Oh, no, no, no. It was him crossing, and then
10 they caught him there.

11 Q And turned him around and sent him back.

12 A Correct. That's when he attempted to enter the
13 US before.

14 Q Correct. And that was about a year before this
15 incident or so?

16 A Correct.

17 Q Okay. Any other information that you learned
18 from Agent Barrientos about Mr. Molina-Salles or any of
19 the other Honduran nationals?

20 A No. I did learn a little bit more about the
21 other employee who Juan Molina-Salles had spoken to who
22 originally provided his name as Glidden Guerra-Sota
23 (phonetic), and then we positively -- Agent Barrientos
24 helped me positively identify him as well.

25 Q He was the other individual that was arrested?

1 A Correct. His name is, yeah, Gomez-Zelaya.

2 Q And didn't Barrientos mention some things about
3 Puerto Rico and people using sort of names of real persons
4 in Puerto Rico? That was just sort of what he told you
5 based on his investigation and kind of knowledge of these
6 cases?

7 A So -- yes. So based on his knowledge, he
8 explained that they have real people in Puerto Rico whose
9 identities were then used by illegal immigrants in order
10 to gain employment. So the name and information that he
11 was using previously was also identified as a Puerto Rican
12 citizen with a different photo. That's one of the main
13 reasons why we figured out he's not actually who his North
14 Carolina ID said he was. Because once we figured that
15 out, he was actually a Puerto Rican with a different
16 photo.

17 Q Okay. And that was true for Juan Molina-Salles
18 and Gomez-Zelaya. They both had -- they're both actual
19 people in Puerto Rico with different photographs?

20 A Correct.

21 Q Anything that Agent Barrientos told you about --
22 like when he said they get these IDs, was it the actual
23 individuals themselves? Was there a group helping them do
24 that, or do you not know?

25 A I know they had an ongoing investigation into

1 that. So I don't -- I'm not a hundred percent sure what
2 their outcome was on how they were getting it. I know
3 there was a lot of investigation into that that you could
4 speak to Agent Barrientos a little more about.

5 Q He would be the best person to sort of answer
6 those questions it sounds like?

7 A Yes.

8 Q Okay. Did you have any other involvement in
9 this case?

10 A No. I just supervised everything and
11 coordinated everything.

12 Q How long were you on scene would you say?

13 A Oh, geez. Several hours at least. I think we
14 went out at about 11:30 at night. I mean, I was probably
15 there until it started to become daylight.

16 Q Well, obviously, if Mr. Molina-Salles -- you
17 were there when he was taken into custody?

18 A Yeah. It was daylight, yeah.

19 Q About eight in the morning?

20 A I want to say maybe -- I don't know. It may
21 have actually been into the afternoon. It kind of all
22 mashed together there time-wise because even when we left
23 the scene, we were still working.

24 Q Sure. Anything -- any other involvement after
25 that sort of -- those sort of 12 to 24 hours following

1 that you did on this case?

2 A No. I just -- I just coordinated everything,
3 and that's about it.

4 Q And did you attend any briefings, any meetings?

5 A I did.

6 Q within your department?

7 A Yeah. So we had several briefings. One just
8 within our unit to kind of figure out what everybody found
9 out through various -- make sure everyone is on the same
10 page with all the different interviews and things of that
11 nature, and then as well as with command staff and
12 everything.

13 Q And how many of those would you say you had?
14 were they like every day for a couple of weeks or --

15 A I mean, so they were every day to every other
16 day for a little while, and then they started to taper off
17 a little bit.

18 Q Okay. And you --

19 A Just updating them on kind of where we were in
20 the investigation, what was going on.

21 Q Sure. Any meetings with the state attorney's
22 office or anything like that around the arrest or charges
23 or prosecution in this case?

24 A Not with me, no.

25 MS. DELIBERATO: All right. I do not have any

1 further questions. Nichole or Liz, any questions?

2 MS. CONSTANTINE: No questions.

3 MS. DELIBERATO: Thanks so much. And it's up to
4 you whether you want to read or waive.

5 THE DEPONENT: I'll read.

6 (Deposition concludes at 1:28 p.m.)

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COUNTY OF PINELLAS)

STATE OF FLORIDA)

CERTIFICATE OF OATH

I, the undersigned authority, certify that SARAH ROBINSON personally appeared before me on the 9th day of February, 2024, and was duly sworn.

witness my hand and official seal this 10th day of February, 2024.

Tamara M. Pacheco

Tamara M. Pacheco, RPR
COMMISSION #942612
EXPIRES: March 30, 2024

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CERTIFICATE OF REPORTER

STATE OF FLORIDA)

COUNTY OF PINELLAS)

I, Tamara M. Pacheco, certify that I was authorized to and did stenographically report the Deposition of SARAH ROBINSON; that a review of the transcript was requested; and that the transcript is a true and complete record of my stenographic notes.

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.

Tamara M. Pacheco

Tamara M. Pacheco, RPR