

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: SEAN CORBETT
TAKEN BY: Counsel for the Defendant
DATE: March 27, 2024
TIME: 2:06 p.m. - 2:23 p.m.
PLACE: ZOOM videoconference
REPORTED BY: Tamara M. Pacheco, RPR
Notary Public, State of FL

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ZOOM VIDEOCONFERENCE APPEARANCES

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EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 SEAN CORBETT

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

5 EXAMINATION

6 BY MS. DELIBERATO:

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

9 A Sean Corbett, S-E-A-N, C-O-R-B-E-T-T.

10 Q Mr. Corbett, my name is Maria DeLiberato. I'm
11 an assistant public defender. I represent Juan
12 Molina-Salles. With me is Nichole Blaquiére. She also
13 represents Mr. Molina-Salles. Elizabeth Constantine is
14 here for the State. She's the attorney prosecuting
15 Mr. Molina-Salles.

16 we're here for your deposition today. Have you
17 ever given a deposition before?

18 A Yes.

19 Q In connection with this case or a different
20 case?

21 A No, ma'am. Not with this case.

22 Q Okay. So sort of typical ground rules. If I
23 ask you a question and you don't understand my question,
24 please ask me to repeat it and I will. It's really
25 important that you answer the questions out loud, so yes,

1 no instead of head nods and things like that so we make
2 sure the court reporter gets down everything you say.
3 okay?

4 A Yes, ma'am.

5 Q Can you tell me your date of birth?

6 A April 2nd, 1979.

7 Q where are you employed?

8 A Archer Western.

9 Q And are you in the Archer Western offices right
10 now? I see you're wearing a construction vest.

11 A Yes, ma'am.

12 Q And is anybody else in the room with you, or are
13 you by yourself?

14 A By myself.

15 Q And what's your title at Archer Western?

16 A Structural project superintendent.

17 Q How long have you worked for them?

18 A Going on ten years now.

19 Q How long have you been a superintendent?

20 A Five years.

21 Q And where are you -- where do you live? what
22 part of Florida? Do you live in Pinellas County? Pasco
23 County?

24 A Hamilton County.

25 Q Hamilton County?

1 A Yes, ma'am.

2 Q Have you lived in any other counties in the
3 state of Florida?

4 A Not other than traveling.

5 Q Okay. You haven't lived anywhere other than
6 Hamilton?

7 A No, ma'am.

8 Q Okay. And are you born and raised there?

9 A Yes.

10 Q Okay. This is a question I have to ask of
11 everybody. It's not meant to embarrass you in any way.
12 Have you ever been arrested for anything?

13 A Yes.

14 Q Can you tell me what you were arrested for and
15 when and what counties?

16 A Hamilton for fighting.

17 Q Okay. Do you know if it was a felony or a
18 misdemeanor?

19 A Misdemeanor.

20 Q How long ago was that?

21 A Probably ten years ago or longer.

22 Q Did it go to court, or did you have to do any
23 kind of program or anything like that?

24 A No. It got kicked out.

25 Q Anything other than that arrest, that

1 misdemeanor arrest?

2 A No, ma'am. Except -- well, years ago. Driving
3 on a suspended license years ago.

4 Q was that also in Hamilton or a different county?

5 A Hamilton.

6 Q Okay. So I want to sort of direct your
7 attention to the evening of September 22nd/23rd, 2022.
8 Were you working for Archer western then?

9 A Yes, ma'am.

10 Q And were you working as a superintendent?

11 A Yes.

12 Q what shift did you work?

13 A Night-shift.

14 Q what time is that?

15 A From 7 to 7, 7 p.m. to 7 a.m.

16 Q Got it. Before you did your deposition today,
17 before today, have you had a chance to sit down and talk
18 to anybody about this case? I know you talked to the
19 police at the scene, but after that, have you had any
20 conversations with anybody about this incident?

21 A No.

22 Q You never went into a different office and gave
23 testimony or anything like that?

24 A No, ma'am.

25 Q Did you talk to anybody at Archer western about

1 your deposition today?

2 A No.

3 Q Did you have to notify somebody that you're
4 having it or help them set up a laptop for you or anything
5 like that?

6 A No.

7 Q So you're working 7 p.m. to 7 a.m. that night.
8 what can you tell me about what you know about the
9 accident. I understand you weren't in that location, but
10 can you sort of tell me when you first heard about it and
11 what you heard?

12 A I just heard that somebody had hit a law
13 officer, and they thought it was the traveling public that
14 had hit him.

15 Q They thought it was what? I'm sorry, I didn't
16 understand.

17 A The traveling -- like a traveling -- like
18 somebody traveling on 275 to begin with.

19 Q Who first gave you any information about the
20 accident?

21 A Laura. I don't know her last name. Laura.

22 Q Caudill?

23 A Yeah.

24 Q And how did she notify you?

25 A By phone.

1 Q Did you know her before this incident?

2 A Yes.

3 Q How long had you known her?

4 A Probably four years.

5 Q What did she say when she called you?

6 A That there had been an accident out on 275
7 southbound in one of our lane closures and that a law
8 officer had been hit.

9 Q Did she give you any other details about who was
10 driving or how the accident happened or anything like
11 that?

12 A No, ma'am.

13 Q Did you ask for any of those details?

14 A I just asked what their location was, and I got
15 there as soon as I could.

16 Q Do you know what time she called you?

17 A I think it was around between 10 and -- between
18 10 and 10:45. Somewhere in that area, I think.

19 Q What was her demeanor like? Was she calm? Was
20 she excited? Was she upset?

21 A Yeah, she was a little upset.

22 Q Did she say anything about whether she thought
23 somebody from her crew was involved?

24 A No, ma'am.

25 Q Okay. How far away were you from the scene of

1 the accident?

2 A Probably four miles.

3 Q And you said you went straight there when she
4 told you what happened?

5 A Yes.

6 Q what happened when you got there?

7 A The police had secured off -- the area secured
8 off and then had the workers separated at the scene.

9 Q Did you ever see the deputy?

10 A No.

11 Q Did you ever get close enough to see him or
12 where his body lay or anything like that?

13 A No, ma'am. I never got close. I could see his
14 body laying, but I didn't get -- I wasn't real close to
15 it. No, ma'am.

16 Q Okay. And what did you do -- you said the
17 police were already on scene when you got there, right?

18 A Yes.

19 Q And how long did it take you to travel those
20 four miles?

21 A Probably seven minutes. Five to seven minutes.

22 Q Okay. And did you talk to the police then right
23 there on scene?

24 A No.

25 Q when did you talk to them? Not until later?

1 A It was later after they had figured out the guy
2 on the loader had hit him. They wanted me to get his
3 address and stuff for them.

4 Q Okay. And that's information that you would
5 have?

6 A I would -- I have to get people to get it for
7 me. Yes, ma'am.

8 Q As the superintendent, that would be a role of
9 yours? Is that why they asked you to do it?

10 A Yes, because I was superintendent on the
11 structural side, and then the project superintendent
12 showed up right after I did.

13 Q Who is that?

14 A Russell Marshall or Marshall Russell.

15 Q Okay. When you were -- when you got on the
16 scene and they have everybody separated, are you talking
17 to anybody else?

18 A No, ma'am. They wouldn't allow nobody to talk
19 to them.

20 Q Okay. That was my next question. Did you speak
21 to Laura Caudill at all other than the phonecall?

22 A No, ma'am.

23 Q And then when you talked to the police officer,
24 it looks like -- and I have a copy of the report -- you
25 basically said you didn't know anything. You didn't

1 witness anything or know anybody on Laura's crew?

2 A No.

3 Q So do you know anybody by the name of Victor
4 Vasquez or Panda or Gordo or anything like that? Is that
5 name familiar to you at all?

6 A I just know them maybe like by face. As far as
7 knowing them -- because they worked on -- like we have a
8 structural side and roadway side. That's roadway side.
9 So I didn't have much dealings with them.

10 Q Okay. They were kind of called the dirt crew it
11 sounds like?

12 A Yes. Yes, ma'am.

13 Q would you know him by his face? Like, you've
14 seen him around? Is that what you mean by that?

15 A Yes.

16 Q Did you ever have a conversation with him do you
17 know?

18 A No.

19 Q Do you know anything about --

20 A Very seldom.

21 Q Okay. Any conversation with him that you can
22 ever remember?

23 A No.

24 Q And did you know whether or not he spoke English
25 or what his nationality was?

1 A No, ma'am. I knew he was a Spanish guy. He
2 used to -- he would come out -- him and Ms. Laura and them
3 would come out and move some barrel walls for us at
4 nighttime so we could get inside of the lane closure and
5 stuff like that. As far as talking to him, I mean, I go
6 crew to crew throughout the night. It wasn't like I just
7 sat there and worked with them.

8 Q You said you knew he was a Spanish guy. Did you
9 know anything else about him or his nationality or where
10 he came from?

11 A No, ma'am.

12 Q Do you know anything about sort of Archer
13 western and their hiring in terms of how they might
14 hire -- like, how does one get hired on the dirt crew? Do
15 they do applications, things like that?

16 A Yes, ma'am, do applications and then we do
17 e-verify stuff.

18 Q Okay. And is that something you do as a
19 superintendent?

20 A No. That's our office.

21 Q Who's in charge of the e-verify in Archer
22 western?

23 A Our office manager, Taylor.

24 Q Do you know anything about how my client Juan
25 Molina-Salles, also known as Victor Vasquez, how he was

1 hired or his background check or anything like that?

2 A No.

3 Q The vehicles themselves, the construction
4 vehicles, are there inspections and like records,
5 maintenance records that are required to be kept for these
6 vehicles?

7 A Yes.

8 Q And is that something you do as the
9 superintendent, or is somebody else responsible for that?

10 A The operators are responsible for that.

11 Q The operator of each front loader?

12 A Yes. And then they turn it in to the -- they
13 turn them in with their time sheets, and it goes to our
14 equipment manager.

15 Q After you spoke with the police, you made a note
16 that there was another -- you noted Craig Sonosky as a
17 possible witness. Do you remember telling the police
18 that?

19 A I told them -- yes, because they was asking
20 about a white vehicle. And I give them -- I called Craig
21 to come back so they could interview him, one of the
22 officers.

23 Q And when you called Craig, did he know about the
24 accident involving the officer?

25 A No.

1 Q was he actually -- had he just witnessed a
2 different accident?

3 A I think he might have witnessed -- there was a
4 car that went off the top of a bridge around the same
5 time. Yes.

6 Q Okay. Did you know about that accident at the
7 time?

8 A Yes. I was notified of it right after the
9 officer.

10 Q Okay.

11 A So actually, I went to the -- where the one went
12 off the bridge, that's where I stopped first because I had
13 my own crew of people working there, and then I went in to
14 where the officer was.

15 Q Okay. And you just told Craig to like -- you
16 gave his information to the police officer, and you said
17 he might have information. But you didn't know whether he
18 had information or not, right?

19 A No. They just wanted to know who drove the
20 white car. Because when this happened, we sent everybody
21 home. You know, all the other workers that was not
22 involved, we sent them home.

23 Q Okay. After you spoke to the police that day,
24 did you do anything else? Did you do any other interviews
25 or anything like that?

1 A No, ma'am.

2 Q When did you go back to work? Were you guys
3 shut down for a little while?

4 A Yes. We went back I think on that Monday.

5 Q Okay. Were there any, like, meetings or safety
6 briefings or anything like that after?

7 A Yes. We had a standdown. Yes, ma'am.

8 Q What did you call it?

9 A It's a standdown where we get the whole group of
10 people together and talk about the incident.

11 Q And what do you remember was said about that.

12 A They just spoke about what had happened, and
13 they just talked about -- I can't recall exactly what was
14 said. It's just a standdown. They talk about accidents
15 that happen and stuff to prevent it from happening again.

16 Q Do you remember anything specific about things
17 that could be done to prevent it or any kind of corrective
18 measures or anything like that?

19 A The only thing I can recall is that we -- once
20 we went back to work, the officers was not to be out of
21 their vehicles while on the job site, and if they was,
22 they had to have a visible vest on at all times.

23 Q And was that actually the procedure beforehand
24 as well do you know?

25 A Supposed to be. Yes, ma'am.

1 Q Okay. So sort of a reconfirmation of make sure
2 this happens?

3 A Right.

4 Q Did you do any research yourself into the case,
5 into like the arrest of my client or anything like that?
6 Read the news, newspaper, or anything like that?

7 A No.

8 Q Not something that you're interested in
9 following?

10 A No, ma'am.

11 Q Okay. The records about the inspections on the
12 operator, do you know -- and if you don't, it's okay -- do
13 you know how long they're required to be kept for?

14 A Like the inspections on the equipment?

15 Q Uh-huh.

16 A That's something that we -- I'm assuming they
17 keep throughout the whole job. All our records go to our
18 main, over in Chicago.

19 Q Do you know who the equipment manager is at
20 Archer Western or would have been at this time?

21 A Then it would have been -- I think it was Gary
22 Morris -- Morrison.

23 Q Okay. I don't think you were, but were you on
24 scene at the time they located Mr. Molina-Salles, my
25 client, and brought him into custody, or were you already

1 gone by then?

2 A Yes, I was still there.

3 Q Did you have an opportunity to see him in
4 custody?

5 A No.

6 Q Okay. How did you hear that they had found him
7 or something like that?

8 A Yes, ma'am.

9 Q Who did you hear that from?

10 A We was standing there when they found him -- I
11 don't know -- like a mile up the road at Ulmerton under
12 the bridge there, and they announced that they had found
13 him.

14 Q Do you remember what they said?

15 A They just said the suspect was -- I heard on the
16 radio the suspect was located.

17 Q Did they describe anything about his demeanor,
18 his appearance, or what he was doing or anything like
19 that?

20 A No, ma'am.

21 MS. DELIBERATO: I don't think I have any
22 further questions. My co-counsel, Nichole may
23 though.

24 MS. BLAQUIERE: I don't have any.

25 MS. CONSTANTINE: No questions.

1 MS. DELIBERATO: Thank you so much. I really
2 appreciate you coming in.

3 THE DEPONENT: Yes, ma'am. Thank you.

4 (Deposition concludes at 2:23 p.m.)
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1 COUNTY OF PINELLAS)

2 STATE OF FLORIDA)

3 CERTIFICATE OF OATH

4

5 I, the undersigned authority, certify that SEAN
6 CORBETT personally appeared before me by ZOOM
7 videoconference and was duly sworn.

8 witness my hand and official seal this 24th day
9 of September, 2024.

10

11

Tamara M. Pacheco

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Tamara M. Pacheco, RPR
COMMISSION # 474485
EXPIRES: March 30, 2028

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ERRATA SHEET

IN THE CASE OF: STATE OF FL v. JUAN MOLINA-SALLES
 NAME OF DEPONENT: ROBERTO SOSA
 CASE NUMBER: 22-09348CFANO

 Please read the transcript of your deposition.
 If you feel you need to make corrections, please note on
 this page. DO NOT mark on the transcript itself.
 Sign and date the transcript below.

PAGE	LINE	ERROR/AMENDMENT	REASON FOR CHANGE

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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 ROBERTO SOSA; 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