

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: CRAIG SONOSKY
TAKEN BY: Counsel for the Defendant
DATE: March 27, 2024
TIME: 1:29 p.m. - 2:04 p.m.
PLACE: ZOOM videoconference
REPORTED BY: Tamara M. Pacheco, RPR
Notary Public, State of FL

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EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 CRAIG SONOSKY

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 My name is Craig Sonosky, C-R-A-I-G,
10 S-O-N-O-S-K-Y.

11 Q Thanks so much. My name is Maria DeLiberato.
12 I'm an assistant public defender. Myself and Nichole
13 Blaquiere represent Juan Molina-Salles in this case.
14 Present for the state is Elizabeth Constantine. She's the
15 prosecutor prosecuting Mr. Molina-Salles.

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

18 A I have not.

19 Q Okay. So a couple of sort of ground rules. I
20 tend to talk really fast. I'll do my best to go slow.
21 It's really important that you answer out loud, so yes or
22 no and not headshakes or head nods or uh-huhs. I can tell
23 what you're saying and so can the court reporter, but
24 because she's typing it down, we need you to answer out
25 loud.

1 A Okay.

2 Q If you don't understand a question -- if you
3 don't understand a question that I ask you, please ask me
4 to repeat it. If you need clarification, that's perfectly
5 fine. If you're guessing, that's okay. I just want you
6 to tell me that you're guessing. If you don't remember
7 something, I don't remember is a perfectly fine response.

8 A Okay.

9 Q So kind of with those ground rules, any
10 questions that you have for me before we start?

11 A I do not.

12 Q Great. What's your date of birth?

13 A September 5th, 1995.

14 Q And you are at work, and you appear to be inside
15 a construction vehicle. Is that correct?

16 A Yes. I'm in a crane at the moment.

17 Q Okay. And where do you work?

18 A I currently work for Johnson Brothers on one of
19 their Orlando projects.

20 Q Okay. Do you no longer work for Archer Western?

21 A That is correct.

22 Q Okay. Did you at some point work for Archer
23 Western?

24 A Yes, I did.

25 Q From when to when?

1 A I don't -- if you want to give me a second, I
2 can give you A start date and an end date.

3 Q That would be great.

4 A Give me half-a-second here. I apologize.

5 Q You're totally fine. Take your time.

6 A I would say early February. End of January,
7 early February of 2020, and I -- I quit there late
8 February, 2023.

9 Q Okay. And you left employment there?

10 A I did. Yes, I terminated.

11 Q How come?

12 A Better job opportunities.

13 Q And is that where you went to go work for
14 Johnson Brothers?

15 A Yes.

16 Q And what was your position with Archer Western?

17 A Crane operator.

18 Q And did you only -- I don't know enough about
19 sort of all their different projects, but did you work
20 multiple projects for Archer Western or just a specific
21 project from February of '20 to February of '23?

22 A It was the only -- that one specific project.
23 So that was the Pinellas Gateway project. That was the
24 only project that I worked on while at Archer Western.

25 Q Great. And where -- do you live in Orlando now?

1 A I have company housing out in Orlando.

2 Q Okay. Where do you live? Where do you get your
3 mail?

4 A That would be in Port Richey in Pasco County.

5 Q Have you lived in any other counties in Florida
6 other than Pasco?

7 A I have not.

8 Q And did you grow up here? Are you from Pasco
9 County?

10 A Born and raised.

11 Q Okay. And this is a question I have to ask of
12 everyone. It's not meant to embarrass you or anything.
13 Have you ever been arrested for anything?

14 A I have not.

15 Q Okay. What kind of -- how far did you go in
16 school?

17 A I'm sorry, can you repeat that? There's a bad
18 connection.

19 Q How far did you go in school?

20 A I have my high school diploma.

21 Q Did you take any sort of specific or specialized
22 training to be a crane operator?

23 A Yes, I did.

24 Q And -- go ahead.

25 A You have to obtain a license. That license is

1 called an NCCCO. So it's N, three Cs, and an O. There's
2 a handful of schooling -- schools that train you to get
3 you ready for your licenses that consist of multiple
4 written and multiple practical exams to obtain the
5 license.

6 Q And when did you become licensed to become a
7 crane operator?

8 A It would have been December 2019.

9 Q Can you tell me a little bit about the hiring
10 process through Archer western? Did you have a background
11 check, an application process? Can you tell me a little
12 bit how you got hired?

13 A I knew the superintendent at the time. He and I
14 knew each other through some contracting work that I used
15 to do with him. On that project, when I applied --

16 (Technical interruption.)

17 Q We lost him. Are you back?

18 A Yeah. I have very bad cell service where I'm
19 at. I do apologize.

20 Q We can actually hear you okay, so hopefully it
21 stays.

22 A Okay. As long as you can hear me, that's all
23 that matters. I knew the superintendent. He offered me a
24 job because I was telling him I was going to obtain my
25 license then. From what I remember, it was a standard

1 hiring process. They took identification. They required
2 obviously a copy of my license and background check, drug
3 test. Kind of the standard for everywhere that I've been
4 hired before. Nothing noteworthy.

5 Q Okay. Who was the superintendent that you knew?

6 A His name is Keith Lowe, K-E-I-T-H, L-O-W-E, but
7 he quit there less than a year after he hired me.

8 Q Okay.

9 A So, yeah, he was -- he was gone, I think, eight
10 months -- eight to ten months after I got hired, and that
11 would have been, I guess, late 2020.

12 Q Okay. When you got hired as the crane operator,
13 did you hold any other positions for Archer Western other
14 than crane operator?

15 A I did not. I was solely there to operate
16 cranes.

17 Q And were you assigned to a particular crew?

18 A No. We had a meeting in the morning -- or I
19 worked the night-shift, so my morning would have been
20 evening -- and figured out who was doing what and where
21 they would divide the crane operators to go to. At that
22 time, there were five other operators, four other
23 operators, and we'd just get to a meeting, figure out what
24 has to be built where and who's going with what crew. So
25 we jumped around on that project a lot.

1 Q Okay. And you work the night-shift you said.
2 So what time is that? From what time to what time?

3 A Five to five. 5 p.m. to 5 a.m.

4 Q And so I'm going to direct your attention to the
5 evening of September 22nd, 2022. So sort of late that
6 night and then late into the next morning. You were
7 working that day, right?

8 A Yes, I was.

9 Q Okay. Actually, I'm going to back up. I
10 apologize, this is something I ask at the beginning. Did
11 you review anything before our deposition today? Did you
12 research anything or review any police reports or anything
13 like that?

14 A No, I have not.

15 Q Have you spoken to anybody about this case, like
16 any lawyers or anybody in Archer western or your company
17 now that you have this deposition?

18 A I mean, I informed my management that I was
19 being deposed today so they're going to have to give me a
20 few minutes, but other than that, no, no time recently. I
21 believe I was contacted by someone in the police
22 department I think two nights after the incident, but
23 other than that, no. I think I told my girlfriend I was
24 being deposed today. Nothing noteworthy.

25 Q Okay. Nobody called you in and had a meeting or

1 anything like that to prepare you or anything like that?

2 A No. No, ma'am.

3 Q So back to September 22nd, 2022, you were
4 working that night, right?

5 A Yes.

6 Q Do you remember where you were, like where you
7 were operating the crane? It would have been around the
8 time of the accident, so like 10ish, between 10 and 11
9 p.m.

10 A Yeah, I can almost give you an exact location if
11 you hang on just a second.

12 Q Sure.

13 A I was -- so I was in the median on 275 where 275
14 and Roosevelt intersect. I was in the median on 275
15 working on a bridge that was going over Roosevelt, on the
16 south side of that bridge.

17 Q Okay. And what -- did you know that this
18 accident happened? Kind of just walk me through the
19 evening as far as -- I know there were two incidents, and
20 I think you were maybe more involved in the other one.
21 Can you just sort of walk me through what happened that
22 evening?

23 A Sure. I was staring at the demo bridge in my
24 crane. That's the way I had it spun. A car went up over,
25 flipped, which was obviously a major incident. I called

1 my superintendent at the time. Ah, I can't remember his
2 name. I called him and said there was an accident on 275.
3 He said, Yes, I already know about the cop. And I said,
4 what cop?

5 And -- I was talking about the car that went
6 over the bridge. He didn't know that the car went over
7 the bridge because it just happened. He didn't know that
8 I didn't know about what happened with the police officer.
9 And so that's how we both found out. He found out about
10 the incident I witnessed, and then I found out the
11 incident that happened later on 275.

12 Q Before that, had you seen any emergency
13 personnel or anything like that going towards the scene?

14 A No. It happened -- I believe the way the
15 timeline worked is that happened within 15 minutes of each
16 other. So obviously, after that, all the EMS, police,
17 FHP, 275 got shut down north and south. That happened
18 kind of after my incident because they happened so close
19 together. So that's really kind of what I saw. We were
20 all kind of focused on the accident that happened right in
21 front of us rather than the accident that happened a
22 couple of miles down the road.

23 Q I understand. Do you guys have a radio channel
24 or communication that way that you communicate with one
25 another?

1 A Not outside of cell phones. So for cranes, we
2 have a CCO guide for hand signals so they can communicate
3 what they want the crane to do, and that's what we do.
4 And that's the standard practice for all crane operators.
5 Radios are operational. We use hand signals for
6 everything.

7 Q Okay. So it's not like you would have had a
8 radio on and heard anybody say about the deputy or
9 anything like that?

10 A No. Even if radios are used, they're used only
11 for where you're working. They're not for any kind of
12 long-range communication. It would be the guys who are a
13 hundred feet ahead of me and only in my one very small
14 localized area. We don't have any kind of long-range
15 communication outside of cell phones.

16 Q Got it. So the accident in front of you, you
17 witnessed the car kind of go over the bridge and land kind
18 of on its nose or on its back?

19 A Yes. On the roof, yeah. Yeah, I watched the
20 entire thing happen. I watched him go up the bridge,
21 which wasn't uncommon to see headlights up there because
22 we're working up there. I thought it was a work car.
23 It's not just a flat-top bridge. It has its walls up, so
24 all you can see is headlights. I saw about six or seven
25 going up there, and one didn't stop. One obviously kept

1 going and obviously fell off. Everybody else slammed on
2 the brakes, turned around and went back the other way. I
3 was facing that at the time.

4 Q Did you get out of the crane and try to render
5 assistance?

6 A I was way too far away. I was as close as the
7 crow flies, but the bridge he went off, he landed on the
8 275 offramp going towards Roosevelt. We were elevated up
9 on 275. We're probably 60-feet above ground level. So
10 for me to go try to render assistance, I would have had to
11 run all the way in the oncoming traffic side, down 275,
12 get to the exit, and then run all the way up.

13 By the time we all kind of got out of our
14 cranes, there were other people there from the company
15 rendering assistance. There were, I believe, police that
16 were there. Fire/EMS showed up as soon as they could.
17 And I think two trucks, maybe four people from our company
18 were there to render assistance.

19 Q Okay. Does -- your superintendent, was it
20 potentially Sean Corbett? Does that sound right?

21 A Yes. That was it, Sean. Thank you.

22 Q That's who -- you saw that accident, and you
23 called, and then the two of you sort of realized there
24 were two different accidents?

25 A Yeah. That's when everything happened where he

1 said he knew about the one, and yeah, we had that
2 confusion because both happened so quick. They happened
3 in succession to each other.

4 Q But you never witnessed anything with the
5 incident involving the police officer?

6 A No. I was, I believe, a minimum of six or seven
7 miles away, because I had to go back to the scene. The
8 police officers recognized my vehicle leaving 275. We
9 were told to go home because we parked on top of 275. We
10 were instructed to drive the wrong way down 275 to get to
11 an exit, to then go into traffic because the police had
12 all of 275 north and south shut down. So it was a
13 different department that saw me. There was a little bit
14 of confusion. They called me back, and that's where I got
15 to meet with a detective. That's kind of how I'm gauging
16 how far I was to where that accident happened.

17 Q Okay. But you never actually witnessed the
18 deputy or saw him or his injuries or anything like that?

19 A No. I was -- when the accident happened, like I
20 said, I was miles away, and when I got called up to go
21 meet with the detective, they had roadblocks and
22 everything. I was so far away from the scene. I was
23 there just to speak with the detective and then leave.
24 They obviously didn't want me there.

25 Q And so the notes that I have from your

1 conversation with that officer said that you were notified
2 by a crew member who spoke Spanish about the deputy. Does
3 that sound right?

4 A Yes. So that was -- that was more -- slightly
5 more detailed. So I knew something happened when I talked
6 with Sean when he said he knew that accident, and then I
7 told him about my accident. And we promptly got off the
8 phone because we had two serious incidents within ten
9 minutes of each other, and he has more important things to
10 do than talk to me about it.

11 Then, yes, someone who spoke Spanish on the crew
12 conjured up enough English to kind of explain what was
13 going on because they either knew somebody on that crew or
14 knew someone who knew someone else who was on that crew,
15 and that's where I got more detail from. But no details
16 were provided to me other than there was an accident by
17 Sean.

18 Q Okay. And so the member -- the Spanish-speaking
19 member, that was a member of your crew, right?

20 A The one that I was working on that night, yes.

21 Q Yes. Do you know his name?

22 A No, not even a little bit. They all go by
23 nicknames. Yeah, I have no idea. I absolutely cannot
24 tell you.

25 Q Okay. And you said they all go by nicknames.

1 what do you mean? when you say that, what do you mean?

2 A well, they just -- I mean, it's a nickname.
3 something easier for us English-only speaking people to
4 reference them by. So I don't even remember. I don't
5 remember his nickname. So I wouldn't know a real name or
6 nickname at this point. That's usually what they go by is
7 something a little bit easier. There's a foreman who had
8 a very long Spanish first name, a very long Spanish last
9 name, and everybody called him Freddie. That was easier
10 for us gringos to call him.

11 Q Understood. So was that, it sounds like -- and
12 I don't want to put words in your mouth. Was it common
13 for members of either your crew or other crews that were
14 only Spanish speaking, were there a lot of
15 Spanish-speaking crew members working for Archer Western
16 during the time of this incident?

17 A Oh, yeah. Oh, yeah.

18 Q How many?

19 A In a percentage -- so divide the employees that
20 Archer Western has. You take management, engineers,
21 office workers, those are all English-speaking people. As
22 far as on the crews, the people that are actually working,
23 maybe 85 to 90 percent. And the ones that did speak
24 English, it was understandable. It wasn't a hundred
25 percent fluid. Sometimes you have to kind of work through

1 some of the language barrier. There were some -- there
2 wasn't just Hispanic people there. We had black people.
3 We had white people working. But I would say, yeah,
4 probably 85ish-percent would be safe to say that you
5 couldn't have a standard conversation without hand signs
6 and gesturing and Google translate.

7 Q Okay. Do you know anything about the
8 immigration status of any of those folks?

9 A No.

10 Q Did you have any --

11 A I don't.

12 Q Did you have any assumptions about it?

13 A Everyone has assumptions about different things,
14 but I -- let's see how to word this? Everyone had
15 assumptions, but there's plenty of great Hispanic people
16 that I've worked with who are citizens on work visas or on
17 Green Cards. And it's also quite impolite to run up to
18 someone and say, Hey, are you an illegal? Are you an
19 illegal alien? And it's also personal information. If I
20 was a Green Card holder, I don't want a bunch of people
21 running up and checking my ID because they have no
22 business doing that.

23 So, I mean, we had assumptions, but we never --
24 I don't know. We didn't talk about it. It's fairly
25 impolite to do that. I think that you don't ask people

1 about lots of personal things. It's quite a personal
2 matter that really no one discussed.

3 Q I understand. I appreciate that. So my
4 understanding from what you told the police officer, so I
5 just want to verify, did you know the foreman, Laura
6 Caudill? Is that name familiar to you at all?

7 A It is not. This is something for you to verify.
8 Do you know what position she held at Archer Western?

9 Q She was, like, about to be the foreman on that
10 crew. Otherwise, she was the lead man is how she would
11 describe it.

12 A Yeah, what did they do? What did they build?
13 Were they doing roadway paving?

14 Q Yes. Gravel, front loaders, things like that.

15 A I'm completely separated from that portion of
16 Archer Western because you don't use cranes for any type
17 of road building. Gravel, paving, asphalt, none of that
18 has to do with cranes. So I do only super structure,
19 which is I build up, and when that gets built, we move to
20 another section to be built. I don't do anything with any
21 flavor of roadways, gravel. The things like the loaders,
22 those can be used for just about anything. We had loaders
23 kind of everywhere, dozers, forklifts. All of the
24 equipment was used, whether it was substructure, deep
25 foundation, super structure, or roadway paving.

1 But as far as my involvement, I had absolutely
2 zero to do with roadway just because I had no business
3 being over there. They didn't need me. They never used
4 us because there's nothing for us to do. But because of
5 that, I never knew anyone on any kind of roadway, which is
6 your paving, gravel, asphaltting, things like that. So,
7 no, I confidently can say I have no idea who that is.

8 Q There's also a reference to the dirt crew. Is
9 that -- like, is that a term for people who do roadway?
10 what does that mean, "dirt crew"?

11 A Dirt crew is pushing dirt around, leveling or
12 preparing dirt. Sometimes we saw them. Every now and
13 then they'd be pushing dirt around. Particularly if
14 they're pushing dirt, we're either done, or we haven't
15 started on that section yet.

16 I knew a couple of them because they would build
17 pads for us when we're going to go to heavy lifts. We had
18 to get a pad that was level and compacted. So I got to do
19 a couple of the dozer operators from over there. I think
20 I knew maybe one or two of them sort of and not well.
21 Just well enough to say hello. But that's not really
22 roadway and paving. Roadway and paving is something
23 that's hard, something you're going to drive on. You're
24 not going to drive on sand.

25 Q Okay. So then it's possible they were on the

1 dirt crew. I'm just reading the report. So it's hard for
2 me to know without all the construction terms.

3 A I understand that. I'm willing to clarify any
4 questions.

5 Q Okay. Did you know anybody by the nickname
6 Victor Vasquez or nickname of Panda or Gordo on the dirt
7 crew?

8 A No.

9 Q And you told the officers that you didn't know
10 anybody on the dirt crew who would have been working in
11 the area of the collision. How did you know what crew
12 would have been working there?

13 A Because the only guy who I knew is Randy Hill,
14 and I believe he was making a crane pad somewhere that
15 night. That was more of a reference -- the way it's being
16 read back to me is too specific. It was I don't know
17 anybody over there because it's road crew. There was the
18 one guy and he -- for all I know, he could have been over
19 there, but that wasn't referencing that crew specifically.
20 It was referencing roadway, and I don't know anybody on
21 roadway.

22 Q Okay. Do you know if the police ever showed you
23 a picture of the person who was alleged to have caused
24 this accident? His name is Juan Molina-Salles, my client,
25 but he had other -- there was other names that he went by.

1 Do you know if they showed you a picture ever?

2 A They did not, no. Once they -- when I was
3 called back to speak with the detective, they quickly
4 realized that I had nothing to do with it and that I was
5 just trying to get off site because of the accident. Once
6 he realized that -- I think he took my ID. He talked to
7 me for a minute or less and then was promptly told to
8 leave. So there was no pictures, nothing about the scene,
9 names of victims, anything like that. I was left in the
10 complete dark on that.

11 Q After this, after you went home and you sort
12 of -- do you, I assume, go back to work the next day or --

13 A I don't remember if we went back the next day.
14 We might have gone back the next day for a meeting and
15 then sent home. I don't remember exactly. I don't think
16 we worked for almost -- no, that's what happened. We were
17 shut down, and I don't think we went back to work for a
18 week because of the investigation. I believe that's
19 correct. I am guessing here, but yeah, I believe it was a
20 week we didn't go back to work for.

21 Q Okay. Do you remember, did you have to attend
22 any safety meetings or briefings or anything like that?

23 A We had safety meetings, you know, every day with
24 crews, once a week with the whole company. And I'm trying
25 to remember if we had -- I'm sure we had something

1 specific on that. Probably when we got back we had
2 another company-wide meeting, which is standard in
3 construction. We had to do a weekly meeting with
4 everybody on site for that shift, and I'm sure we went
5 over it when we got back to work.

6 Q Anything specific you remember about that
7 meeting?

8 A No. Just kind of, from what I remember, a
9 standard meeting. They obviously didn't go into any kind
10 of detail on what happened because it was still under
11 investigation. They keep their mouth shut about ongoing
12 investigations. I don't remember anything that stuck out
13 prominently.

14 Q After this did you do any, like, research on
15 your own? Did you follow anything in the news about this
16 case or the arrest of my client or anything like that?

17 A Yeah. Yeah, I did. To be honest, I did more
18 research on the accident that happened in front of me
19 because it happened in front of me. I can't find anything
20 to my dismay over that.

21 Then later, I found out through a friend of
22 mine -- we weren't super close, but we were friends when I
23 was like 15, 16, 17. We kind of ran in similar groups.
24 William Hartwick posted on his Facebook that his father
25 passed away on 275, and I put the pieces of the puzzle

1 together.

2 Q So you were friends with the deputy's son?

3 A Yeah. I was friends with them when I was
4 younger. They lived further away from where I did. We
5 just kind of ran in the same circles. We'd meet up every
6 now and then to hang out in a big group, like I said, when
7 I was 15, 16, 17. Then after that, we stayed friends on
8 Facebook but didn't talk or anything. So that's how I
9 found out the name of the officer, because it was his
10 father that was killed.

11 Q Okay. Did you talk to him about it or offer
12 condolences or anything like that?

13 A No. We weren't that close at that time.

14 Q Understood. Have you spoken to him at all since
15 then other than the Facebook post that you saw?

16 A No.

17 Q Any other -- like, did you read any newspaper
18 articles or anything like that about my client or his
19 immigration status or anything like that?

20 A No. I -- well, I think somewhere in one of the
21 news articles it referenced him, something about his
22 immigration status, but it was not information I was
23 seeking out. It was pretty prominent news shared on
24 social media and running on regular news.

25 Q Okay. I think you already said. Other than

1 today, this deposition, you haven't given any formal
2 statements or anything like that about this incident,
3 right?

4 A Outside of the detective that I talked to that
5 night, no.

6 MS. DELIBERATO: I don't have any further
7 questions. My co-counsel may. Do you have any
8 questions?

9 MS. BLAQUIERE: Yes.

10 EXAMINATION

11 BY MS. BLAQUIERE:

12 Q When you said that there were safety meetings,
13 were any of them ever in Spanish or were --

14 A Yes. All meetings are conducted with a
15 translator or if -- I believe at that time we had a
16 Hispanic safety manager. He would say a few sentences in
17 English, and then it would all be repeated in Spanish.
18 Prior to that, when we had a non-Spanish-speaking safety
19 manager, there was a translator that would repeat whatever
20 he was saying. He would say a couple of sentences, and
21 the translator would repeat it again in Spanish. That
22 goes for all of our safety meetings, whether they were
23 company-wide weeklies or our dailies.

24 Q Okay. And then the reference to not talking
25 about the case or the accidents right after they happened,

1 was that a company policy or just like an unspoken?

2 A You're saying for the company not informing us
3 what was happening?

4 Q And I may have not heard you correctly, so I
5 apologize. Earlier did you say that you guys weren't
6 supposed to talk about the accidents right after they
7 happened?

8 A Incorrect. I did not say that. I said that
9 during our safety meetings, we were not briefed on what
10 happened. We weren't briefed on victims. We weren't
11 briefed on anybody who -- any suspects who would have done
12 it. We weren't briefed on what the accident entailed.
13 They did not speak about that in any capacity because it
14 was an ongoing investigation.

15 Q And when you say they didn't speak about it, who
16 is "they"?

17 A Management. So that would be superintendent,
18 office, safety managers. Anybody with any kind of
19 authority who had potentially information about it did not
20 relay any information to us.

21 Q Were there queries? Were people, you or anyone
22 else asking what happened?

23 A Yes.

24 Q You specifically?

25 A No. Other people have asked what was happening.

1 Q Oh, the -- have you ever worked in the same area
2 as a front loader ever in your life?

3 A So you're not talking about that specific night?

4 Q Correct.

5 A Yes, constantly.

6 Q Okay. Are front loaders loud?

7 A Yes, very.

8 Q I'm sorry?

9 A Yes, they are. They -- I don't know. It
10 depends -- my definition of loud is going to be very
11 different than your definition of loud. It's a diesel
12 engine.

13 Q That was my follow-up.

14 A Do you think a truck going by is loud? I don't.
15 You might. So that's kind of up for debate.

16 Q Okay. That's understandable. It depends on
17 your perspective. As a construction worker, they're
18 relatively loud machines, right?

19 A Yeah. It's a diesel engine. So, yeah, if you
20 heard one, you've kind of heard them all.

21 MS. BLAQUIERE: I appreciate it. I don't think
22 I have anymore follow-up. I don't know if Maria
23 does.

24 MS. DELIBERATO: I don't. Liz, any questions?

25 MS. CONSTANTINE: I don't have any questions.

1 Thank you.

2 MS. DELIBERATO: Thank you for taking your time
3 to talk with us today.

4 THE DEPONENT: Of course. You guys have a good
5 rest of your day.

6 (Deposition concludes at 2:04 p.m.)

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1 COUNTY OF PINELLAS)

2 STATE OF FLORIDA)

3 CERTIFICATE OF OATH

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5 I, the undersigned authority, certify that CRAIG
6 SONOSKY 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

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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: CRAIG SONOSKY
CASE NUMBER: 22-09348CFANO

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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 CRAIG SONOSKY; 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