

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CRIMINAL DIVISION
CASE NO.: 22-09348-CF-T

STATE OF FLORIDA,)
)
 Plaintiff,)
)
vs.)
)
)
JUAN ARIEL MOLINA-SALLES,)
)
 Defendant.)
)
-----/

DEPOSITION

OF

HEATHER MEADE
FORENSIC SCIENCE SPECIALIST

(Appearing via Zoom.)

TAKEN BY: Defendant

DATE: Wednesday, November 20, 2024

TIME: 1:58 p.m. - 2:21 p.m.

PLACE: Videoconference (Zoom)

Reported By: Gina M. Manning
Court Reporter, Notary Public
State of Florida at Large

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APPEARING VIA ZOOM ON BEHALF OF THE PLAINTIFF:

ELIZABETH CONSTANTINE, ESQUIRE
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Office of the State Attorney
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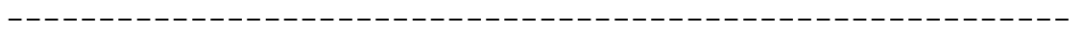
APPEARING VIA ZOOM BEHALF OF THE DEFENDANT:

MARIA DELIBERATO, ESQUIRE
NICHOLE BLAQUIERE, ESQUIRE
County Justice Center
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14250 49th Street North
Clearwater, Florida 33762
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I N D E X

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E X H I B I T S

(No exhibits.)

P R O C E E D I N G S

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Thereupon,

HEATHER MEADE

was called as a witness by the DEFENDANT and having first been duly sworn by the court reporter was examined and testified on her oath as follows:

DIRECT EXAMINATION

BY MS. DELIBERATO:

Q. Could you please state and spell your name for the record.

A. Yes. My name is Natasha, N-A-T-A-S-H-I-A, Meade, M-E-A-D-E.

Q. Okay, now I'm confused because I had you as Heather Meade.

A. Heather, yes. Okay, I go by... Heather is my middle name.

Q. Okay. You're fine. I'm just making sure I have the right Meade that I'm about to ask questions to.

Can you tell me where you're employed.

A. I'm employed through the Pinellas County Sheriff's Office and the Forensic Science Division.

Q. And what is your title and role there?

A. Forensic science specialist. I process crime scenes.

Q. Any particular area of specialty? Blood spatter?

1 Fingerprints? Anything like that? Or just general?

2 A. Just general.

3 Q. How long have you been employed there?

4 A. I've been with the agency 24 years.

5 Q. My name is Maria DeLiberato. I'm an assistant
6 public defender. Myself and Nichole Blaquiere represent
7 Juan Molina-Salles. Present for the State is
8 Elizabeth Constantine. We're here for your deposition.
9 I have Pinellas County Sheriff's Case Number 22-305232.

10 I note that you authored two supplements,
11 Supplement 58 and 86. Is that right?

12 A. Yes, that's correct.

13 Q. And I think we talked before we went on the record
14 that you have access to those on your phone, so you may
15 need to refer to that during the deposition.

16 A. Yes, ma'am.

17 Q. Perfectly fine. Just let me know that's what
18 you're doing.

19 A. Okay.

20 Q. Do you have an independent recollection of
21 the scene?

22 A. Yes, I do.

23 Q. And is that because of the nature of the scene,
24 that was a deputy involved death? Or anything else?
25 Any other reason?

1 A. Both.

2 Q. What are the other additional reasons?

3 A. I'm sorry, no additional reasons.

4 I was called in to work the scene, and I happened
5 to know Deputy Hartwick.

6 Q. Okay, so that was my next question. Did you know
7 him professionally or personally?

8 A. Both, yes, ma'am.

9 Q. How long did you know him for?

10 A. As long as he was employed at the sheriff's office.

11 Q. Did you socialize outside of work together
12 occasionally? Or no?

13 A. No, we never did.

14 Q. Okay. When's the last time you had a conversation
15 with him before the accident?

16 A. I couldn't give an exact time, like, on months or
17 dates or whatever, because he ended up going to an opposite
18 shift that I worked. So shift work, you kind of really
19 don't see a whole lot of people anymore. But there was
20 a point in time he went to day shift and I was still on
21 nights.

22 Q. Did he ever talk to you about the Archer Western
23 construction detail that he had worked?

24 A. No.

25 Q. Do you know anything about that specific detail?

1 A. No, I do not.

2 Q. So you were working and you got called out to the
3 scene. About what time was that?

4 A. Referring back to my notes, I was not currently
5 working. I believe I got called in for this event at --
6 I have to look. I got en route at 0250, on scene at 0309,
7 and completed at 1436.

8 Q. So kind of middle of night?

9 A. Yeah. So I received a phone call in the middle of
10 the night and I worked until the following day, yes.

11 Q. Okay. When you got on to the scene, can you kind
12 of describe to me what was happening?

13 A. So, basically, I was on one end of the scene; our
14 command staff was at the other end of the scene. I was
15 just kind of waiting to have the approval to start
16 photographing the scene of the front-end loader.

17 Q. My understanding is that there was like a primary
18 and a secondary scene. There was Deputy Hartwick's cruiser
19 and then the front loader, which were at a distance from
20 one another. Is that right?

21 A. Yes, that's correct.

22 Q. Do you know about how far apart they were?

23 A. I don't remember, no.

24 Q. Could you see one scene from the other?

25 A. I could see the general area from where I was to

1 where the cruiser was, yes, ma'am.

2 Q. Okay. Who was giving direction as far as when you
3 should start and what you should do?

4 A. Well, our command staff, but it was being relayed
5 through the assistant supervisor who called me in, which
6 was Rhonda Klein.

7 Q. And you were tasked specifically with photographing
8 the scene of the front loader?

9 A. Yes.

10 Q. Do you recall, was Deputy Hartwick still on scene
11 or had he yet been transported to the medical examiner's
12 office?

13 A. I don't remember.

14 Q. Did you have any part in photographing or
15 processing his body or the area around him?

16 A. No, I did not.

17 Q. Did you ever process or photograph the cruiser
18 at all?

19 A. No, I did not.

20 Q. Okay.

21 So what did you do with respect to the
22 front loader?

23 A. So I conducted general photographs. I did general
24 swabs as in I did swabbings for touch DNA. And there were
25 some items that were collected near the front-end loader

1 for finger processing as well. And the front-end loader
2 was also processed for fingerprints.

3 Q. And what was the purpose of that?

4 A. The purpose for that was to try and see who
5 actually was driving this front-end loader, who had been
6 in the front-end loader.

7 Q. And what was the evidence collected, kind of, from
8 the outside and the front of it?

9 And you can refer to your report.

10 A. Okay, thank you. I'm about to do that.

11 So the evidence is -- okay, there was a glove from
12 the dirt, a plastic to-go container from the dirt, sandwich
13 debris on the forks of the front-end loader, a white cap
14 maybe to a water bottle, on the front cab area of the
15 front-end motor, a green pen, and a red marker.

16 Q. Okay.

17 And then it looks like also on the front loader
18 there was, I think you said piece of ham. There was like
19 in your report notes, a piece of ham. A food substance.

20 A. Yes, ma'am. Sandwich debris.

21 Q. From a sandwich, okay.

22 A. Yes.

23 Q. So you photograph and collect those items that
24 you've described in your report?

25 A. Yes, ma'am.

1 Q. And then you did also some swabbings of the front
2 loader to try to determine who was operating it?

3 A. Correct.

4 Q. Did you do any fingerprint dusting or anything like
5 that, or is that somebody separate?

6 A. No. I did that as well.

7 Q. What do you do first? Are you photographing
8 everything first?

9 A. Yes, ma'am.

10 Q. And then do you swab first or fingerprint dust
11 first?

12 A. You fingerprint -- no, I'm sorry. You swab first.

13 Q. Swab first and then fingerprint dust?

14 A. Yes, because you don't want to contaminate the
15 possible DNA.

16 Q. Would the swabbing potentially, like, mess up
17 a fingerprint, though?

18 A. Depends on where you swab.

19 Q. Okay. Are you trained to sort of try to swab areas
20 and do it in a separate place or you're just doing the best
21 that you can?

22 A. We kind of -- well, it kind of depends. It depends
23 on a multitude of things. However, we do our best
24 not to -- if we feel at that point in time that -- it's
25 mainly up to the detectives.

1 What's more important: Are we looking mainly for
2 DNA or are we looking for prints; in this case, we're
3 looking for both. We try to swab an area where we don't
4 think fingerprints would be.

5 And then primarily in this case, the windows and
6 the cab area of the front-end loader would be,
7 fingerprint-wise, the trims on the door interior and
8 exterior. And the windows as well. You would swab the
9 steering wheel and gear shifter and things of that nature
10 for DNA.

11 Q. Okay. So you're processing all of that. What else
12 are you tasked with doing?

13 A. I had to fingerprint and get a buccal swab,
14 a sample of people's DNA from their mouths, from three
15 other individuals.

16 Q. Do you know who those individuals were?

17 A. Yes. Let me refer back. Sorry for the jumping
18 around. They were coworkers of this individual. So the
19 names that I have are a Douglas Hernandez -- I don't know
20 how to pronounce this -- Calladaras [sic] Hispanic male
21 with a date of birth 7-31 of 1984.

22 MS. DELIBERATO: I'm going to have you spell
23 it just for the court reporter.

24 THE DEPONENT: It's C-A-L-L-A-D-A-R-A-S
25 [sic].

1 The next name is Cinthia, C-I-N-T-H-I-A, Gomez,
2 G-O-M-E-Z, Hispanic female, 7-15-2003.

3 And the last subject, first name is Elieser,
4 E-L-I-E-S-E-R -- and it's a hyphenated last name --
5 Gomez G-O-M-E-Z, hyphen Zelaya, Z-E-L-A-Y-A, Hispanic
6 male, 5-8-91.

7 BY MS. DELIBERATO:

8 Q. And I thought I heard you say that you had taken
9 DNA and fingerprinted them. But did you fingerprint them
10 or just photograph them?

11 A. Photographed, I did take -- they're called
12 elimination fingerprints. And then a buccal swab of
13 their mouth.

14 Q. Does your report -- and maybe I'm just missing it.
15 Does your report notate the elimination prints or not?

16 A. Let me just refer back and read. It's been a while
17 since I read this report.

18 Q. I understand. I just want to make sure I'm not
19 missing it.

20 A. You have to forgive me because on here it's kind of
21 blurry on the edges, so I can't read all of the words.
22 Maybe it's not in my report. I know I took them.

23 Q. That was my next question, whether or not you're
24 certain that you took the elimination prints from these
25 three individuals.

1 A. Well, I know that another supervisor came out
2 during the daytime hours and she also assisted with that as
3 well. And Supervisor D'Jimas, she was with me at the scene
4 of those three people because they were off-site from where
5 the front-end loader was.

6 Q. Where were they?

7 A. They were in a roadway. And I don't remember
8 exactly where the roadway was, but it's kind of like
9 underneath an overpass and then an off-ramp, in that
10 location.

11 Q. Were they kept together or were they kept separate?
12 Do you know?

13 A. I know they're -- I think they're separate.
14 And, again, please forgive me. It's been a while. I
15 believe they were in three different cruisers, but in the
16 same area.

17 Q. Okay. Do you remember anything about them?
18 Their demeanor? Their level of cooperation?

19 A. With me they were very quiet, very calm, very
20 cooperative. I didn't have any problems with them.

21 Q. Did you have to speak to them at all?

22 A. I did to let them know I was photographing them and
23 to get their elimination prints.

24 There was quite a -- a little of a language
25 barrier, but we made it through.

1 Q. Okay, that was my question. Do you speak Spanish?

2 A. No, I do not.

3 Q. But you felt like you were able to communicate with
4 them, what you were trying to do?

5 A. Yes.

6 Q. And then it looks like you also at some point
7 photographed my client, Mr. Molina-Salles.

8 A. I did, yes.

9 Q. Was that at the scene or back at the station?

10 A. If I remember correctly, it was back at the scene.

11 Q. And you're welcome to refer to the...

12 A. Yes, I'm going to. Sorry, it's taking a while
13 to flip back and forth between the pages here.

14 Q. It looks like we're on Supplement 58, Page 5.

15 A. Yes, but I mean with my phone going back and forth
16 through the different screens. Okay, hold on one second.
17 Okay, I found it. I'm so sorry for that.

18 Q. You're fine.

19 A. I conducted general photographs of
20 Juan Ariel Molina-Salles to included the following:

21 "Wearing a long..." Would you like me to tell you what
22 I photographed?

23 Q. You don't have to read it, but just tell me what
24 you photographed.

25 A. Just what he was wearing at the time when I

1 photographed him, which was a long-sleeved shirt with
2 a pocket on the upper left chest. Dark gray pants that
3 were wet at the bottom and had a belt attached. He was
4 also wearing work boots; and I photographed the bottoms,
5 like the shoe patterns of the shoe -- of the boots as well.

6 Q. Do you remember anything about his demeanor?

7 A. No. Again, calm and cooperative.

8 Q. Was he in handcuffs when you were
9 photographing him?

10 A. That, I don't recall.

11 Q. And, again, you don't speak Spanish. Did you have
12 to communicate with him as far as telling him
13 what to do or not?

14 A. That, I don't remember. I honestly can't remember.

15 Q. Did you take a buccal swab from him as well?

16 A. I did, yes.

17 Q. Okay. I don't see that notated.

18 A. Me just double-check. Hold on. I'm sorry.
19 No, I did not. It was just from the three other
20 individuals.

21 Q. Anything else that you were asked to do?

22 A. No, just processed the front-end loader and the
23 subjects as well. That was it.

24 Q. Okay. So photographs of my client, photographs and
25 buccal swabs of the three individuals, and you think

1 fingerprints, that's the elimination prints, but that's
2 not documented in the report.

3 A. I know. I do remember getting those things.
4 And -- I don't know, but maybe Supervisor D'Jimas collected
5 those items. I do remember assisting her. Maybe she
6 collected them -- I'm uncertain -- and also some items that
7 were found on Mr. Molina-Salles, like the pens that were on
8 his person; photographed those, collected the pens and,
9 I believe, the food container and the glove.

10 I can't remember if I did anything else on
11 that date.

12 Q. Obviously you're taking these photographs. Is
13 there anybody that's -- this is a silly question --
14 videotaping you doing this? Like, does anybody have
15 a body-worn camera on or anything like that? Do you know?

16 A. No.

17 Q. Okay. So the documentation is the photographs that
18 you took of the individuals.

19 A. Yes, it is.

20 Q. Okay. And it does say later in Supplement 122 that
21 you and D'Jimas collected buccal swabs, latent prints, and
22 photographs of Cinthia, Duglas, and Allen (phonetic).
23 So I'm not sure. It sounds like somebody else wrote
24 it down.

25 A. Yeah. So I believe -- I know she assisted me with

1 it because we were at the scene for quite some time, and
2 then those three individuals needed processing.

3 She may have collected those, took those into her
4 possession and entered them just the same to save time for
5 me. So we assisted one another.

6 So that was it, basically, on that date. Then
7 those items that were collected.

8 Q. Did you then do follow up later back at the lab or
9 anything with any of these pieces of evidence that you
10 collected?

11 A. So following that on 9-26, back at the lab -- let
12 me get to that portion. And I did use -- I conducted
13 general photographs of the green pen, the red marker, the
14 glove, the water bottle, and plastic to-go container.

15 Also, I swabbed the mouth area of the bottle for
16 any saliva DNA.

17 And then the lid, the green pen, and the to-go
18 container process. Removed the sticker from the clear
19 plastic to-go container and processed it for possible ridge
20 detail.

21 And then -- I'm trying to think of what else.

22 So those items are processed and received negative
23 results for possible ridge detail, and then I submitted
24 those items into a secure property and evidence locker
25 pending pickup.

1 Q. And that was the next day?

2 A. It was on 9-26.

3 Q. Anything else that you did after 9-26?

4 A. No, ma'am, that was it.

5 Q. Did you attend any meetings or briefings in your
6 department or with the state attorney's office about this
7 case?

8 A. No.

9 Q. Did you do any research into my client or his
10 background or the charges that he's facing or anything like
11 that?

12 A. No.

13 Q. Have you sort of followed the case as it's wound
14 through the court system or just got your subpoena and here
15 you are?

16 A. I got my subpoena and here I am.

17 MS. DELIBERATO: I don't have any further
18 questions. I'm not sure if my co-counsel does or
19 if the State does.

20 MS. BLAQUIERE: Not from me.

21 MS. CONSTANTINE: No questions.

22 MS. DELIBERATO: Thank you so much for
23 coming in.

24 THE COURT REPORTER: Thank you.

25 (The deposition concluded at 2:21 p.m.)

CERTIFICATE OF OATH

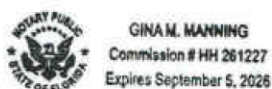
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STATE OF FLORIDA)
COUNTY OF PALM BEACH)

I, the undersigned authority, certify that
HEATHER MEADE appeared before me via Zoom teleconference
and was duly sworn.

WITNESS my hand and official seal this 16th day of
December 2024.

GINA M. MANNING
Shorthand Reporter
Notary Public - State of Florida
My Commission Number: HH261227
Expires: September 5, 2026



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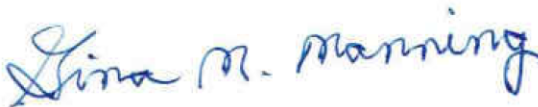
REPORTER'S DEPOSITION CERTIFICATE

STATE OF FLORIDA)
COUNTY OF PALM BEACH)

I, GINA M. MANNING, Shorthand Reporter and Notary Public, certify that I was authorized to and did stenographically report the teleconference deposition of HEATHER MEADE and that the foregoing transcript is a true and accurate 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.

Dated this 16th day of December 2024.



GINA M. MANNING
Shorthand Reporter
Notary Public - State of Florida
My Commission Number: HH261227
Expires: September 5, 2026

1 IN RE: DEPOSITION OF: HEATHER MEADE

2 DATE TAKEN: Wednesday, November 20, 2024

3 IN THE CASE OF: STATE OF FLORIDA, Plaintiff, vs.
4 JUAN ARIEL MOLINA-SALLES, Defendant.

5 ERRATA SHEET

6 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES

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21 Under penalties of perjury, I declare that I have read
22 the foregoing document and that the facts stated in it
23 are true.

23

24

DATE HEATHER MEADE

25