

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

RYAN MEARSE

(Appearing via Zoom.)

TAKEN BY: Defendant

DATE: Wednesday, November 20, 2024

TIME: 2:23 p.m. - 2:31 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
County Justice Center
Office of the State Attorney
14250 49th Street North
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APPEARING VIA ZOOM BEHALF OF THE DEFENDANT:

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NICHOLE BLAQUIERE, ESQUIRE
County Justice Center
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14250 49th Street North
Clearwater, Florida 33762
Phone: 727-464-6516

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(No exhibits.)

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Thereupon,

RYAN MEARSE

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

DIRECT EXAMINATION

BY MS. DELIBERATO:

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

A. My name is Ryan Mearse. That's R-Y-A-N for the first name. The last name is Mearse, M-E-A-R-S-E.

Q. And how are you employed?

A. I am currently -- are you talking about at the time of when the scene happened or now?

Q. Both.

A. Well, at the time, I was employed with the Pinellas County Sheriff's Office as a deputy recruit under Deputy Reidy. Currently I'm employed with the Genesee & Wyoming Railroad out of Fort Wayne, Indiana.

Q. My name is Maria DeLiberato. I'm an assistant public defender. Myself and Nichole Blaquiere represent Juan Molina-Salles; present for the State is Elizabeth Constantine; and we're here for your deposition today because you're a listed witness in this case.

1 It's Sheriff's Case Number 22-305232.

2 I don't note that you authored any supplement
3 report. Is that right?

4 A. That is right.

5 Q. Did you review --

6 A. Not that I'm aware of, anyways.

7 Q. Okay.

8 Did you review anything before your
9 deposition today?

10 A. I'm sorry?

11 Q. Did you review anything before your
12 deposition today?

13 A. Besides what was written on the case; that's all I
14 have reviewed.

15 Q. And what's that? What was written? What do you
16 mean?

17 A. Just, basically, all the events that took place
18 that we ended up performing with.

19 But at no time did I have any direct involvement
20 in the case.

21 Q. I understand, but I'm trying to -- for the
22 record, like, did you get read somebody else's report?
23 Did you read --

24 A. Yes. I read Reidy's report; that's who I was with
25 the whole night.

1 Q. Okay. And that's Supplement 9, for the record.

2 And his last name is R-E-I-D-Y. Does that
3 sound right?

4 A. Yes.

5 Q. So how long were you with the Pinellas County
6 Sheriff's Office?

7 A. Between, I think, four to six months.

8 Q. How come so short?

9 A. It was just. I was in field training. It just
10 wasn't for me. So I kind of, you know, at that point just
11 decided to do, you know, a different type of employment.

12 Q. Okay.

13 A. But that's basically... I was in field training,
14 though.

15 Q. What do you do for the railroad now?

16 A. I'm a conductor for the railroad.

17 Q. Did you have any other law enforcement experience
18 other than --

19 A. I had four years with Security Forces with the
20 United States Air Force out of MacDill Air Force Base
21 before I joined Pinellas County.

22 Q. And I'm not trying to pry or anything, but the
23 job itself wasn't for you or the sheriff's office wasn't
24 for you? Or both?

25 A. It's just... It was more just the job,

1 like, I, you know... It ended up being a little different
2 than what I did in the military and it just... I don't
3 know. It was just, basically, a personal-type of decision
4 at that point and, you know, just... Basically,
5 I didn't feel it was for me, so...

6 Q. But this night you were under training with
7 Deputy Reidy, is that right?

8 A. Yeah, that is right.

9 Q. Any specific, like, unit he was assigned to?

10 A. Well, I wouldn't say that -- I can't think of any
11 offhand. I know we were patrolling in the north district,
12 and we got a dispatch that attempted -- it came on the
13 radio traffic of a possible deputy-involved hit-and-run and
14 that the dispatch attempted to raise Deputy Hartwick but
15 didn't get any response.

16 At that point, we ended up going to get the
17 M.A.I.T. vehicle where we met up with Corporal Mullins.
18 We got all the material for that, and then we ended up
19 proceeding to the scene at 275 southbound.

20 Q. And then just for the record, the M.A.I.T. vehicle
21 that's the Major Accident Investigation Team?

22 A. Yes.

23 Q. And was Deputy Reidy a part of that?

24 A. I -- I wish I could tell you fully that he had
25 direct involvement with them, but I know that we met up

1 with Corporal Mullins, who was.

2 Q. Okay.

3 A. And then at that point, that's where we got all the
4 supplies and stuff needed.

5 Q. Did you know Deputy Hartwick personally or
6 professionally?

7 A. I did not. I mean I'm sure I have had in passing,
8 but not like I've talked to him or anything of that nature.

9 Q. Okay. Did you know anything about that
10 Archer Western construction detail?

11 A. Not fully, no.

12 Q. And I don't know the answer to this: Would you
13 have been eligible to work that off duty as a recruit or
14 not yet?

15 A. I don't believe so, no. That was only for
16 the ones that were actual out of FTO, field training.

17 Q. Okay.

18 Where was your -- in your six-month, six-ish-month
19 stint at PCSO, where was this accident? Towards the
20 beginning? Towards the end?

21 A. I would say it was closer towards the end, yes.

22 Q. So you actually eventually make your way to the
23 275 scene. Has Deputy Hartwick already been pronounced by
24 the time you get there?

25 A. I don't fully remember. I don't want to just make

1 an assumption. I don't fully remember on that one. I wish
2 I could give you that answer.

3 Q. That's okay.

4 What did you specifically do?

5 A. I parked -- I drove Deputy Reidy's cruiser.
6 I positioned it next to the M.A.I.T. vehicle; and at that
7 time, I just stood by as perimeter. Basically, security
8 at that point. He -- at that point, he performed with the
9 case. I ended up staying with his cruiser until it was
10 about time for me to leave, and Deputy (unintelligible)
11 ended up picking me up later on that night and returned me
12 back to my personal vehicle.

13 Q. Okay.

14 A. So there was no direct involvement in the case
15 at all.

16 Q. You didn't interview any witnesses? Talk to
17 anybody?

18 A. No.

19 Q. Anything that you remember, like, overhearing,
20 seeing that sort of sticks out? I imagine it was a pretty
21 chaotic scene. Is that right?

22 A. It was chaotic when they -- when the dispatcher
23 said a possible deputy hit-and-run. You kind of get that
24 knot in your stomach type of thing. And I think that's
25 probably -- I mean, I don't want to speak for everyone

1 else, but I know that kind of hit me differently because,
2 you know, it's kind of, you know -- even though I've never
3 met Deputy Hartwick, you know, he's still -- he was one of
4 us, and it's kind of personal at that point type of thing.

5 Q. Understood.

6 So how would you say you stayed on scene?

7 A. Jeez, I would like to give -- I can't give an exact
8 number because I wasn't timing it, but I would say it was
9 definitely over an hour, I would say. Like I said, I don't
10 have the direct timeframe. I know it wasn't a short amount
11 of time, but I can't give you the exact amount.

12 Q. Did you do anything else after you left? Were you
13 asked by Deputy Reidy or anybody else to do any follow-up
14 on this case?

15 A. No, I was not.

16 Q. Did you attend any meetings or briefings in your
17 department or in with the state attorney's office about
18 this case?

19 A. I have not, no.

20 Q. Did you do any research into my client or his
21 arrest or the circumstances of his arrest or anything
22 like that?

23 A. I did not, no.

24 Q. Do you remember, like, reading any newspaper
25 articles or following it in the newsletter?

1 A. Well, it was on the news, but that was about it.
2 They, basically, mainly talked about Deputy Hartwick just,
3 you know, being deceased and stuff. But they never went
4 into detail about who it was or -- there was no actual
5 information that had been given to them, that I was
6 aware of.

7 Q. Not that you noticed?

8 A. Right.

9 Q. When did you move to Indiana?

10 A. I moved to Indiana -- that would be January
11 of 2023.

12 Q. So just a couple of months after this?

13 A. Yes.

14 Q. Okay. So I assume you haven't followed the case in
15 the news since you went to Indiana?

16 A. I have not, no.

17 Q. Then you got the subpoena and I made you come
18 back here.

19 A. Yes. I saw that in my email, and I'm like,
20 "Ah, okay."

21 MS. DELIBERATO: I don't have any further
22 questions. I really appreciate you taking the
23 time out. I'm not sure if my co-counsel.

24 MS. BLAQUIERE: No questions.

25 MS. DELIBERATO: And I don't think the

1 State does either.

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

3 MS. DELIBERATO: Thank you so much.

4 (The deposition concluded at 2:31 p.m.)

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CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF PALM BEACH)

I, the undersigned authority, certify that
RYAN MEARSE 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

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



REPORTER'S DEPOSITION CERTIFICATE

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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 RYAN MEARSE 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: RYAN MEARSE

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 RYAN MEARSE

25