

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  
SERGEANT JOHN MULLINS  
(Appearing via Zoom.)

TAKEN BY: Defendant  
DATE: Wednesday, November 20, 2024  
TIME: 2:32 p.m. - 2:43 p.m.  
PLACE: Videoconference (Zoom)

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

A P P E A R A N C E S

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

APPEARING VIA ZOOM ON BEHALF OF THE PLAINTIFF:

ELIZABETH CONSTANTINE, ESQUIRE  
County Justice Center  
Office of the State Attorney  
14250 49th Street North  
Clearwater, Florida 33762  
Phone: 727-464-6221

APPEARING VIA ZOOM BEHALF OF THE DEFENDANT:

MARIA DELIBERATO, ESQUIRE  
NICHOLE BLAQUIERE, ESQUIRE  
County Justice Center  
Office of the Public Defender  
14250 49th Street North  
Clearwater, Florida 33762  
Phone: 727-464-6516

I N D E X

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

		Page Number
TESTIMONY OF SERGEANT JOHN MULLINS		
Direct Examination by Ms. Deliberato		4
No Cross-Examination		--
CERTIFICATE OF OATH		14
CERTIFICATE OF REPORTER		15
ERRATA SHEET		16

-----

E X H I B I T S

(No exhibits.)

P R O C E E D I N G S

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Thereupon,

SERGEANT JOHN MULLINS

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. John Mullins, M-U-L-L-I-N-S.

Q. And how are you employed?

A. I'm currently a sergeant with Pinellas County Sheriff's Office.

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. We're here for your deposition today. It's Pinellas Case Number 22-305232.

Before we get into some specifics, I don't note that you authored a supplement in this particular case, in Deputy Hartwick's accident. Is that right?

A. Correct.

Q. I do understand though, that there was a second accident that evening that I think you may have responded

1 to, and you probably wrote some supplements in that.

2 Is that correct?

3 A. Yes.

4 Q. Okay. I'm not going to go into that in detail  
5 other than I'll probably just ask you a few brief questions  
6 about it. But I just wanted to make sure you didn't do a  
7 supplement in this case.

8 A. Okay.

9 Q. Can you walk me a little bit through your history,  
10 background with law enforcement, when you started with  
11 PCSO, and any experience before that.

12 A. So I joined the Air Force in 2010 where I was  
13 employed as a Security Forces member with them, which is  
14 essentially military law enforcement. I did that for  
15 six years to include traffic homicide with the Air Force  
16 for my last, approximately, three years.

17 I gained employment here with the Sheriff's office  
18 in 2016, I think July of 2016, and I've been on patrol the  
19 entire time in various capacities, whether it's a deputy,  
20 a regular corporal, a field training deputy, a field  
21 training corporal, and then now I'm currently a field  
22 training sergeant.

23 I'm currently a team leader on the Major Accident  
24 Investigation Team; at the time of this crash, I believe I  
25 was an assistant team leader. And I've been on the M.A.I.T.

1 team since -- maybe four -- four or so years I've been  
2 involved with the M.A.I.T. team.

3 Q. During your time either in the Air Force or with  
4 PCSO, ever had any complaints sustained against you for any  
5 reason?

6 A. No.

7 Q. So talk to me about your involvement in this  
8 particular case. How was it that you got called out to  
9 the scene?

10 A. I was on duty as a corporal in the city of Dunedin,  
11 working midnights at the time.

12 To the best of my recollection without checking  
13 a calendar, I believe my team was on call for M.A.I.T. as  
14 well. I scanned the different patrol channels, and I  
15 remember overhearing, originally, a call get dispatched on  
16 the bridge and they attempted to call Deputy Hartwick on the  
17 radio several times and that he wasn't answering, which kind  
18 of piqued my interest. So I switched over to that radio  
19 channel and listened as units arrived on scene and located  
20 him down on the roadway.

21 They advised that CPR was in progress on a deputy,  
22 potentially involving an accident that would more likely  
23 than not involve the Major Accident Investigation Team.

24 So I self assigned to the call and responded  
25 directly to the scene.

1 Q. Did you know Deputy Hartwick personally or  
2 professionally?

3 A. Both. Yes.

4 Q. Did you spend time socializing outside of work  
5 together?

6 A. Not so much outside, but he had spent some time at  
7 the front desk earlier that year, I believe; and I'd come  
8 to know him from stopping in there because that's within  
9 the assigned area that I had.

10 Q. My understanding is that he was on, like, some  
11 light-duty or something, so he was doing desk for  
12 a little bit.

13 A. Correct.

14 Q. Did you talk to him at all about the Archer Western  
15 construction detail?

16 A. Not that I can recall.

17 Q. Do you have any familiarity with the Archer Western  
18 construction detail?

19 A. I think I worked it once, maybe twice and that  
20 was it.

21 Q. Before the accident?

22 A. Yes.

23 Q. Have you worked it since?

24 A. No.

25 Q. Do you remember anything specific on the

1 two -- one or two times that you worked it? Any safety  
2 briefings or anything that Archer Western gave you before  
3 doing the duty?

4 A. Nothing that specifically jumps out at me. They  
5 gave you your assigned locations, brought you there, and  
6 there was a brief conversation. I just don't remember the  
7 specifics of that.

8 Q. Okay.

9 So it sounds like you self-assigned the call.  
10 Did you hear pretty quickly on the radio that the  
11 Signal 7 was called?

12 A. Yes.

13 Q. And that was kind of -- you heard the "deputy down"  
14 and then heard the Signal 7 pretty -- I don't want to put  
15 words in the mouth, but how quickly after it?

16 A. Was within a couple of minutes. I remember him  
17 saying that there was a deputy down; then there was CPR in  
18 progress; and then shortly after, Signal 7 was called.

19 Q. Had you even made it out of Dunedin to the scene  
20 yet when that happened?

21 A. I was certainly not on scene when that had  
22 occurred, but I would have been responding. I don't know  
23 where specifically I was when that happened.

24 Q. Did you have the M.A.I.T. truck or did you have to  
25 go get it?



1 A. I contacted somebody else to get the truck.

2 Q. Okay. So when you get on scene, what happens?

3 A. I made contact. There was, obviously, a large law  
4 enforcement presence upon my arrival.

5 I kind of just made sure that there was some crime  
6 scene tape and everything had been set up. The road was  
7 shut down.

8 I think we -- I suggested to the lieutenant on  
9 scene that we move the original line that we had, back  
10 further to make the scene larger to accommodate more of a  
11 work area.

12 And then within -- not very long after my arrival,  
13 I was made aware of that second crash and told to head that  
14 direction.

15 Q. And did you go there by yourself or did you go  
16 there with other people to second scene?

17 A. So when I left the first scene and went to the  
18 second scene, there was already a Pinellas Park officer on  
19 scene, because that was his, like, assigned detail  
20 location. He was working the Archer Western as well when  
21 the vehicle drove off the overpass in front of him.  
22 So I met with him. And I think there were maybe two or  
23 three other deputies that had arrived at that location  
24 prior to me.

25 Q. And were they doing -- the person who had been in

1 the accident, was he receiving medical treatment?

2 A. I believe by the time I arrived, he was  
3 already gone.

4 Q. Okay, and that accident was also part of the  
5 Archer Western construction site, is that right?

6 A. Yes. It's a very large -- it was a very large  
7 area, so it was within the same general vicinity.

8 Q. Okay. What did you do with respect to that  
9 investigation.

10 A. As far as the entirety of it?

11 Q. Yes.

12 A. I worked that investigation from start to finish as  
13 a standard traffic homicide call out. There were serious  
14 bodily injuries.

15 So my duties primarily consisted of working that  
16 investigation.

17 Q. Did you make any determination as far as, like,  
18 what caused the accident? Was it like failure to secure  
19 that unfinished roadway? Was it driver error? Anything  
20 like that? Do you know?

21 A. I mean, the guy drove over an on-ramp that was  
22 unfinished, in the wrong direction; and there was no  
23 barriers that would have prevented his access to that.  
24 When he drove off, that's... That's where it was.

25 Q. Okay. So it's not like he like rammed some clear

1 blockage sign that said "Do Not Enter" or anything  
2 like that?

3 A. Correct. To the best of my knowledge, there was  
4 nothing that prevented the driver from traveling up that.

5 Q. Okay. And does anything happen in that case from  
6 a criminal standpoint, like a citation to the construction  
7 company for failure to secure? Anything like that?

8 A. Nobody was issued citations in that instance.

9 Q. Okay. Is that something that could even happen?

10 A. That -- that would -- I don't know. I'm not --  
11 I'm not sure if I'm the correct person to be able to answer  
12 that question.

13 Q. Okay. Your job is just to sort of see what  
14 happened and piece together the accident?

15 A. An independent gatherer of facts.

16 Q. Did you ever make it back, then, to  
17 Deputy Hartwick's scene?

18 A. I was actually in the process of pulling the times  
19 before this started.

20 It looks like I cleared off the other crash at  
21 around 8:00 in the morning. I cleared off Deputy Hartwick's  
22 around 4:00 a.m., it looks like. I don't remember. I would  
23 have had to drive by it. They were within the same on and  
24 off ramp of that exit. But I never made it back over to his  
25 scene. And Deputy Hartwick was already removed from the

1 scene and transported to the medical examiner's office by  
2 the time I left the other scene.

3 Q. Okay, so you were not tasked with doing any other  
4 duties with respect to --

5 A. Correct.

6 Q. After that, did you have any follow up meetings,  
7 briefings, tasks with respect to Deputy Hartwick's scene?

8 A. Not with respect to Deputy Hartwick's scene, no.

9 Q. Okay. I assume you probably continue to do some  
10 follow up on the other accident?

11 A. Correct. Yeah, I could have coined (phonetic)  
12 the investigation with that one.

13 Q. Have you done any research into this particular  
14 case, into my client, what he's charged with?  
15 Anything like that?

16 A. What do you mean have I done research into your  
17 client?

18 Q. I mean, like, did you follow this case  
19 at all through the court system that you know what my  
20 client is charged with or follow anything on the news or  
21 anything like that?

22 A. I'm certainly aware of the news and I have  
23 knowledge from working here as to what's going on with it  
24 but it's not something that I check on routinely.

25 Q. Okay. I just didn't know. I know there was a lot

1 of news coverage right around the time and I didn't know if  
2 you knew.

3 A. Yeah, I'm aware of the news coverage, yes.

4 Q. Anything that you remember standing out about the  
5 news coverage that you heard?

6 A. Nothing that jumps out at me now.

7 Q. Anything about his background or his immigration  
8 status or anything like that?

9 A. That has no bearing to me.

10 Q. Okay. I'm just asking if you heard it.

11 A. If I heard it?

12 Q. Yeah.

13 A. I -- I wouldn't be able to tell you yes or no for  
14 certain if I remember that.

15 Anything else that you did pertaining to this case  
16 that I haven't yet asked you about?

17 A. Nothing that I can independently recall.

18 MS. DELIBERATO: I don't have any further  
19 questions. I don't know if my co-counsel does or  
20 if the State does.

21 MS. BLAQUIERE: No questions.

22 MS. CONSTANTINE: Nothing from me.

23 MS. DELIBERATO: Thank you.

24 You have a good day.

25 (The deposition concluded at 2:43 p.m.)

CERTIFICATE OF OATH

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

STATE OF FLORIDA        )  
COUNTY OF PALM BEACH    )

I, the undersigned authority, certify that  
SERGEANT JOHN MULLINS 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



GINA M. MANNING  
Commission # HH 261227  
Expires September 5, 2026

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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 SERGEANT JOHN MULLINS 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: SERGEANT JOHN MULLINS

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

7 -----

Page No.	Line No.	Change	Reason
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			

9 -----

10 \_\_\_\_\_

11 \_\_\_\_\_

12 \_\_\_\_\_

13 \_\_\_\_\_

14 \_\_\_\_\_

15 \_\_\_\_\_

16 \_\_\_\_\_

17 \_\_\_\_\_

18 \_\_\_\_\_

19 \_\_\_\_\_

20 \_\_\_\_\_

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

24 \_\_\_\_\_

DATE

SERGEANT JOHN MULLINS

25