

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 GIOVO
TAKEN BY:	Counsel for the Defendant
DATE:	November 19, 2024
TIME:	10:23 a.m. - 10:32 a.m.
PLACE:	ZOOM videoconference
REPORTED BY:	Tamara M. Pacheco, RPR Notary Public, State of FL

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## ZOOM VIDEOCONFERENCE APPEARANCES

ELIZABETH CONSTANTINE, ESQUIRE

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EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 CRAIG GIOVO

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

5 EXAMINATION

6 BY MS. DELIBERATO:

7 Q Good morning. Could you please state your name  
8 and spell your name for the record.

9 A Craig Anthony Giovo, G-I-O-V, as in Victor, O.

10 Q And how are you employed?

11 A I'm retired.

12 Q From where?

13 A Pinellas County Sheriff's Office.

14 Q When did you retire?

15 A 3/3 of 2023.

16 Q Okay. And how were you employed by PCSO? What  
17 was your role?

18 A I was a forensic science specialist.

19 Q How long were you there?

20 A Twenty-nine-and-a-half years.

21 Q That's a very long time.

22 A. Yes.

23 Q We're here for your deposition today. My name  
24 is Maria DeLiberato. I'm an assistant public defender.  
25 Myself and Nichole Blaquiere represent Juan Molina-Salles.

1 Nathan Vonderheide and Elizabeth Constantine are here for  
2 the State.

3 It is Pinellas Sheriff's case number 22-305232.  
4 I have that you authored one supplement, Supplement 76.  
5 Does that sound right?

6 A That's correct.

7 Q Did you actually get a chance to review that  
8 before our deposition today? Did someone send it to you?

9 A Yes, I have it.

10 Q Okay. Perfect. If you need to refer to it at  
11 all, perfectly fine. Just let me know that's what you're  
12 doing.

13 A Thank you.

14 Q Do you have an independent recollection of this  
15 scene?

16 A Well, I responded to the Pinellas County Medical  
17 Examiner's Office and --

18 Q Did you ever -- sorry, go ahead.

19 A No, go ahead.

20 Q Did you ever go to the accident scene itself?

21 A No, I did not.

22 Q Okay. That's what I thought. So tell me a  
23 little bit about what you recall and how you were  
24 dispatched out to the medical examiner's office.

25 A Well, I was requested by Assistant Supervisor

1 Rhonda Klein to respond to the medical examiner's office  
2 reference a hit-and-run investigation involving the death  
3 of Deputy Michael Hartwick. Upon my arrival out there, I  
4 met with Deputy Blumberg with Pinellas County Sheriff's  
5 Office Crimes Against Persons Unit, and he requested I  
6 photograph the deceased before the clothing was removed.

7 Q Is that unusual to do so at the medical  
8 examiner's office?

9 A No, that's not unusual. Years ago we would  
10 actually be down there all the time photographing  
11 decedents, so that wasn't unusual. The circumstance, you  
12 know, was hard, but no, it's not unusual.

13 Q Okay. Because I didn't know. I know there was  
14 some scene pictures taken, and then the medical examiner's  
15 investigator, Mel Segui -- I'm not sure if it was Mel on  
16 this case. I can't remember -- takes pictures. This was  
17 sort of a separate documentation from the Sheriff's office  
18 of Deputy Hartwick before the autopsy. Is that right?

19 A That's correct.

20 Q Did you know Deputy Hartwick either personally  
21 or professionally?

22 A Professionally I knew Deputy Hartwick. I worked  
23 calls with him through the years.

24 Q Okay. Do you recall any kind of recent  
25 conversations before the accident that you had with him?

1 A No, I don't.

2 Q Okay. Did you ever talk to him or know anything  
3 about the Archer-Western construction detail that he was  
4 working?

5 A No.

6 Q Okay. And is that something that you would ever  
7 do, like a duty, or no, probably not?

8 A No. We would not do that.

9 Q Not as a forensic science specialist. That  
10 makes sense.

11 A Right.

12 Q Were you working the day -- sort of the day  
13 before when the accident happened?

14 A The day before?

15 Q Right. If you went to the medical examiner's  
16 office the next morning, were you on call the night  
17 before?

18 A No. I was at work. I was at work that morning,  
19 so I was already at the office.

20 Q Got it. Had you heard on the radio or on the  
21 news or somewhere? Did you know what happened before you  
22 were asked to do go to the medical examiner's office?

23 A Briefly I did because I was at the office. So I  
24 heard that a deputy had been hit, and at that time, I  
25 didn't know who it was until I got down there and met with

1 Detective Blumberg.

2 Q. Okay. And other than photographing Deputy  
3 Hartwick, did you collect any evidence?

4 A (Nods head.)

5 Q what did you collect?

6 A If I can refer to my notes?

7 Q Absolutely.

8 A So I collected his uniform shirt, his pants,  
9 undershirt, men's briefs, the back side portion of the  
10 ballistics vest, the duty-belt which contained -- oh, and  
11 the contents of the clothing described above. The wallet,  
12 we also had a wallet, and that was turned over to  
13 Detective Blumberg.

14 Q Just the wallet was turned over to the  
15 detective? Everything else was turned over where?

16 A Let me just refer back here.

17 Q Sure.

18 A So the duty-belt, which had all the equipment on  
19 there, I collected all that, his pants, his shirt, the  
20 uniform shirt and pants, the undershirt and men's brief.  
21 The wallet was turned over to Blumberg, the only thing  
22 that he collected.

23 Q Okay. And it looks like also you did an  
24 alternative light energy it says for possible additional  
25 bruising?



1           A     Right, alternate light source using a UV light  
2 just checking if I could see any darkening on the skin as  
3 far as bruising, and I didn't see any.

4           Q     You documented in your report sort of the  
5 visible injuries. Did you ever -- and maybe -- I'm not  
6 saying that you did or should or shouldn't have. Did you  
7 ever actually physically touch Deputy Hartwick to feel any  
8 of the injuries or anything like that?

9           A     No. No, I did not. They had a medical examiner  
10 investigator assisting Deputy Blumberg with taking the  
11 clothes off and, you know, turning the body and all that.

12          Q     And you're just taking photographs?

13          A     Right.

14          Q     Did you stay for the autopsy?

15          A     No, I did not.

16          Q     Okay. Did you do anything else with this case?

17          A     So after we were done at the medical examiner's  
18 office, I responded back to the forensic science lab, and  
19 I rephotograph the clothing, the uniform clothing, the  
20 pants and everything that I collected.

21                     Let me back up. Before that, Deputy Blumberg  
22 requested I go to the Sheriff's office detective unit with  
23 him, homicide unit and photograph the contents of the  
24 wallet.

25          Q     Okay.

1           A     So I photographed the contents of the wallet,  
2 and everything was turned back over to Deputy Hartwick.

3           Q     To Deputy Blumberg?

4           A     I'm sorry, Blumberg, yes.

5           Q     Okay. So the contents of the wallet at the  
6 medical examiner's office. Then you did the clothes  
7 separately at the lab, and then I assume you put your  
8 photographs -- upload them somewhere, put them in some  
9 sort of system so that they're preserved?

10          A     Yes. The disk from the camera was turned over  
11 to the Forensic Imaging Unit in our office.

12          Q     Okay. Did you do anything else other than that?

13          A     No, I did not.

14          Q     Did you -- were you ever asked to go back and  
15 look at any other evidence or anything like that?

16          A.    No, I was not.

17          Q     Did you attend any briefings or meetings either  
18 in your department or with the State Attorney's office  
19 about this particular case?

20          A     No, I have not.

21          Q     Did you do any research into my client or his  
22 background or the charges that he's facing or anything  
23 like that?

24          A     No, I have not.

25          Q     And I think you said you retired in 2023?

1 A Yes, 3/3 of '23.

2 MS. DELIBERATO: Okay. I don't have any further  
3 questions for you. I'm not sure if my co-counsel  
4 does or not.

5 MS. BLAQUIERE: No.

6 MS. DELIBERATO: No questions. And if the State  
7 has any questions?

8 MS. CONSTANTINE: I don't have any questions.  
9 Thank you.

10 MS. DELIBERATO: Nathan, do you have any  
11 questions? I'm going to guess he doesn't.

12 MS. CONSTANTINE: Sorry. I apologize.

13 THE DEPONENT: It broke off. I didn't hear you.

14 MS. DELIBERATO: Nobody has anymore questions.  
15 You're all set. Thank you so much for taking the  
16 time this morning. I appreciate it.

17 (Deposition concludes at 10:32 a.m.)

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COUNTY OF PINELLAS )

STATE OF FLORIDA )

CERTIFICATE OF OATH

I, the undersigned authority, certify that CRAIG GIOVO personally appeared before me and was duly sworn.

witness my hand and official seal this 18TH day of JANUARY, 2025.

Tamara M. Pacheco

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

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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 GIOVO; 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

