

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: RANDALL HART
TAKEN BY: Counsel for the Defendant
DATE: November 19, 2024
TIME: 10:41 a.m. - 10:49 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

NATHAN VONDERHEIDE, ESQUIRE

Assistant State Attorneys

14250 49th Street North

Clearwater, Florida 34620

Attorneys for the State of Florida

MARIA DELIBERATO, ESQUIRE

NICHOLE BLAQUIERE, ESQUIRE

Assistant Public Defenders

14250 49th Street North

Clearwater, Florida 34620

Attorneys for the Defendant

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EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 SERGEANT RANDALL HART

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 and spell
8 your name for the record.

9 A Good morning. It's Sergeant Randall Hart,
10 H-A-R-T. First name Randall, R-A-N-D-A-L-L.

11 Q. My name is Maria DeLiberato. I'm an assistant
12 public defender. Myself and Nichole Blaquiere represent
13 Juan Molina-Salles. We are here for your deposition.
14 Present for the State is Nathan Vonderheide and Elizabeth
15 Constantine.

16 I have Sheriff's case number 22-305232, and I
17 have that you authored one supplement, Supplement 103.
18 Does that sound right?

19 A. Yes.

20 Q. And have you had a chance to review that today
21 before our deposition?

22 A. I have.

23 Q. Okay. And if you need to refer to it at any
24 point, perfectly fine to do so. Just let me know that's
25 what you're doing.

1 A. All right. Thank you.

2 Q. Before we begin though, can you walk me through
3 your law enforcement career. How long have you been with
4 PCSO?

5 A. I've been with Pinellas County for ten years
6 now. I started out with Fish and wildlife. I did that
7 for five years, from 2009 to 2014. Since 2014 with the
8 sheriff's office, I've worked patrol. I've worked with
9 the Marine-Land Unit for approximately five years. Then I
10 went back to the road and was promoted to sergeant. Then
11 I worked with the Home Task Force, our Habitual Offender
12 Monitoring Enforcement for three years, and now I'm
13 currently in our Threat Management Section.

14 Q. What's the Threat Management Section?

15 A. We're going to be identifying, assessing, and
16 managing any concerning behavior that happens in Pinellas
17 County, so people of concern.

18 Q. Sounds like a big job.

19 A. It is.

20 Q. So have you ever had any -- in the time of your
21 law enforcement career, ever had any complaints sustained
22 against you for any reason?

23 A. Just minor complaints. Nothing severe.

24 Q. Sustained meaning you had some sort of
25 discipline for them or anything like that.

1 A. No.

2 Q. It's a question I ask everybody. It means no
3 offense.

4 A. I gotcha.

5 Q. Can you tell me a little bit about how it was
6 that you got involved in this particular case. Were you
7 on duty? How did you get sent to the scene?

8 A. Yeah. I was down in St. Pete working with the
9 Home Task Force at the time. We just overheard radio
10 traffic that there was a possible deputy down. No other
11 information was provided. So I just got my guys and
12 started heading north. We were in down in the South
13 St. Pete area. Then we started hearing some radio traffic
14 to close down 275. Again, we weren't exactly sure where
15 the incident occurred, so we just started stopping traffic
16 northbound on 275.

17 Q. Okay. Do you know Deputy Hartwick personally or
18 professionally?

19 A. Yes. He was actually my corporal back in 2015
20 for a short period of time.

21 Q. Okay. Do you recall kind of the last
22 conversation with him that you had before this accident?

23 A. No. I hadn't talked to him in a long time prior
24 to.

25 Q. Okay. Do you know anything about the

1 Archer-Western construction detail he was working?

2 A. I was familiar with it. Nothing in detail.

3 Q. Okay. Did you ever work it?

4 A. Not with PCSO. I've been working -- not that
5 particular detail. I worked with FWC. I worked with
6 them. Like back between 2009 and 2014 I worked with
7 Archer.

8 Q. In that same area or a different project?

9 A. Different area. I was working, again, with the
10 state, so I was all over the state of Florida with them.

11 Q. Anything about your experience with
12 Archer-Western? Any concerns you had over safety
13 protocols or anything like that in the time -- I
14 understand it was a separate detail -- that you worked
15 with them?

16 A. No.

17 Q. Okay. So as you're hearing the radio traffic
18 making your way towards the scene, do you ultimately hear
19 that Deputy Hartwick had passed, had been called deceased
20 sort of pretty early on after the call went out?

21 A. I believe so. I eventually made my way to the
22 scene, and I was told that he had passed.

23 Q. Did you actually get to a place where you were
24 able to observe him?

25 A. No. I stayed on the northbound lanes. I never

1 crossed over to the southbound lanes.

2 Q. And what were you doing specifically? You were
3 blocking off traffic?

4 A. I was blocking traffic and rerouting northbound
5 traffic where they could divert them off of the
6 interstate.

7 Q. Okay. And at some point you also went to the
8 satellite office for Archer-Western?

9 A. Correct.

10 Q. Who tasked you to do that?

11 A. I don't recall. It would have been the
12 lieutenant or above that had us do that.

13 Q. Okay. And what did you -- what was your purpose
14 in going there?

15 A. We were making sure that we contained all
16 employees that were there to try to see what was going on.
17 We still didn't know what exactly happened. Once they
18 learned that an employee had been involved, they asked us
19 to make sure that we kept the integrity of all the staff
20 members that were there.

21 Q. It looks like you talked to an assistant project
22 manager, Robert Short?

23 A. Yes, I believe so.

24 Q. Okay. It says you requested a roster of
25 everyone working and time-sheets?

1 A. Correct.

2 Q. Did you ask -- there was a note that came in
3 that there was a potential Victor Vazquez potentially that
4 maybe was the employee that potentially was involved. Do
5 you remember that?

6 A. That was a name that was relayed to me, yes.

7 Q. And were you able to kind of match that up on
8 the time-sheet?

9 A. I have to look in my report. I believe there
10 was a Victor, but I don't know if it was actually Victor
11 Vazquez.

12 Q. Okay. If you want to look at your report, you
13 can.

14 A So, yeah, I was told there was a suspect name of
15 Victor, and the name I found on the time Victor Vazquez.

16 Q. Okay. Did you learn any more information about
17 that particular individual or get any other background
18 from Mr. Short about who he was or anything like that?

19 A. No. Mr. Short didn't have much information to
20 provide. I provided that to Detective Thompson at that
21 point.

22 Q. Did you talk to Mr. Short about anything else,
23 about who they hired or their hiring practices or anything
24 like that?

25 A. Not that I recall, no.

1 Q. Okay. And then it says you later took a
2 perimeter position as the K9 Teams deployed. Where was
3 that?

4 A. It was just south of the scene, kind of back to
5 where I was blocking traffic off of Roosevelt.

6 Q. Okay. And what did you do there? Like, in your
7 car you were, or you were standing outside on foot?

8 A. In my car. In my cruiser.

9 Q. Okay. Were you actually present when he was --
10 when Mr. Molina-Salles was located?

11 A. No, I was not.

12 Q. Did you ever lay eyes on him or anything like
13 that?

14 A. No.

15 Q. Any other involvement that you had that's not
16 detailed here in your report?

17 A. No.

18 Q. When you were released from the scene that day,
19 did you ever go back and do anything else? Were you ever
20 tasked to interview any other witnesses or collect anymore
21 evidence?

22 A. No.

23 Q. Did you attend any briefings or meetings either
24 in your department or at the State Attorney's office about
25 this particular case?

1 A. No.

2 Q. Did you do any research into Mr. Molina-Salles,
3 into his background, into what he's charged with or
4 anything like that?

5 A. Just what I saw in the news, but I did not go
6 into any detail.

7 Q. What do you remember seeing on the news?

8 A. I just remember he was -- I believe it was a
9 false name that he provided, but that's all I can remember
10 on that.

11 Q. Do you remember anything noted about his
12 immigration status on the news or anything like that?

13 A. I don't recall.

14 Q. Any investigations into Archer-Western or their
15 hiring practices or anything like that?

16 A. No.

17 Q. Not that you recall?

18 A. Not that I recall, no.

19 Q. Okay. Anything that I haven't asked you about
20 here today that you did in relation to the case?

21 A. No.

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

25 MS. CONSTANTINE: I have no questions.

1 MS. BLAQUIERE: I IM'd you, Maria. I didn't
2 want to ask questions you already asked.

3 BY MS. DELIBERATO:

4 Q You did work the Archer-western detail. These
5 depos are all running together for us. I'm sorry. Did
6 you ever work the Archer-western detail?

7 A. Not with the Sheriff's office, no.

8 Q. with Fish and wildlife, a separate detail. I
9 remember now. Sorry, my brain is -- we've been doing this
10 for two days.

11 A. You're good.

12 MS. DELIBERATO: That's all I have. Thank you
13 so much.

14 (Deposition concludes at 10:49 a.m.)

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1 COUNTY OF PINELLAS)

2 STATE OF FLORIDA)

3 CERTIFICATE OF OATH

4

5 I, the undersigned authority, certify that
6 SERGEANT RANDALL HART personally appeared before me and
7 was duly sworn.

8 witness my hand and official seal this 13th day
9 of January, 2025.

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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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 RANDALL HART; 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

