

ZOOM VIDEOCONFERENCE APPEARANCES

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EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 ALEXANDER FOSTER

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 afternoon. Can you please state your name
8 for the record.

9 A It is Detective Alexander Foster, F-O-S-T-E-R.

10 Q And how are you employed?

11 A I am a detective with the Pinellas County
12 Sheriff's Office.

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

17 We're for here for your deposition today. It's
18 Sheriff's case number 22-305232. I have that you authored
19 just one supplement, Supplement 37. Is that right?

20 A Yes, ma'am.

21 Q Have you had a chance to review it before the
22 deposition today?

23 A I have.

24 Q And do you have an independent recollection of
25 your involvement in this case, minimal as it was?

1 A Yeah. Basically, I was told to go to one of the
2 exits near Roosevelt going onto I want to say Gandy, but
3 basically, I was blocking traffic for just like the
4 outside perimeter. So that was about it.

5 Q Okay. We'll get into it, just a few more
6 specifics. Can you talk to me a little bit about your law
7 enforcement background? How long have you been with PCSO?

8 A I've been there for eleven years, since 2013.

9 Q And when did you become a detective?

10 A I've been in my current unit for two years.
11 Sorry, I'm going inside. I've been in the current unit
12 for two years. So I've been a detective for two years,
13 and then before that, when this occurred, I was with the
14 Home unit, which deals with juveniles.

15 Q You're a detective in what unit now?

16 A It's called the Tactical Investigations Section.

17 Q Okay. Any prior law enforcement experience
18 before PCSO?

19 A No, ma'am. Just the Sheriff's office.

20 Q And ever had any complaints sustained against
21 you for any reason while at PCSO?

22 A No, ma'am.

23 Q And so I know you spoke briefly about that you
24 were kind of called to block off traffic. Were you on
25 duty that night?

1 A I was. I was with the -- I was with the Home
2 unit that night. So we were just doing probation checks
3 on kids. And, yeah, I don't remember specifically how we
4 were told to go on the call. I want to say probably the
5 sergeant texted us or got on the radio and told us to go
6 over there.

7 Q So did you ever make it to the site where Deputy
8 Hartwick was struck by the vehicle?

9 A No. I never even made it up to the higher up
10 area, like the onramp or anything. I was just on
11 Roosevelt Boulevard the entire day/morning -- or sorry,
12 night/morning.

13 Q Yeah. It looks like from your report you were
14 there from 2256 to 0840?

15 A Yeah.

16 Q And did you just stay in your car blocking
17 traffic?

18 A Yeah. I mean, other than the occasional getting
19 out to talk to somebody here and there or let people know,
20 hey, you can't come this way. Yeah, I didn't do -- I
21 basically didn't leave that little five-foot radius of my
22 car.

23 Q Okay. Did you know Deputy Hartwick either
24 professionally or personally?

25 A No. I only met him maybe once or twice that I

1 can think of, but no.

2 Q Okay. Did you ever remember any conversations
3 you ever had with him or anything like that?

4 A No. The only time I can even think that I would
5 have interacted with him would have been during my FTO
6 maybe. That was, you know, eleven years ago. I want to
7 say he was a corporal for one of the squads I was in, and
8 that was like one phase of my FTO. So I think maybe once
9 or twice I interacted with him.

10 Q Okay. Did you know anything about the Archer
11 Western Construction detail?

12 A That one specifically, I had -- if I had worked
13 that one, it was only once. I worked other details for
14 them, but I never worked that one specifically.

15 Q Any experiences that you had with Archer Western
16 in terms of their safety protocols or anything like that?

17 A No. The one I did -- I don't remember the exact
18 timeline. I apologize. It was for the Roosevelt overpass
19 project. We met with a project manager somewhere. They
20 said, hey, this is what we've blocked off. They just said
21 stay in your car, make sure your lights are on. If
22 anything specific happened as far as we need these lanes
23 blocked off or anything, they would specify. Otherwise,
24 it was very basic. Just, hey, this is where we need you
25 guys, this is what we need you to do, and that was pretty

1 much it.

2 Q So they just tell you go sit in your car, put
3 your lights on. That's about it?

4 A Right. If something happened -- like,
5 specifically it's not relevant to the case, but like we
6 had a guy going the wrong way. It was a DUI or something
7 like that. We would get a heads up and say, hey, I think
8 that guy is DUI. You might get out and try to find him.
9 Otherwise, we were told, hey, unless something specific
10 happens, just stay on your post. Make sure you've got it
11 blocked off. That's what you're there for. You're not
12 there to go and do calls. You're specifically there to
13 block off traffic for the detail.

14 Q So other than this sort of sitting on the
15 traffic detail this night, did you have any other
16 involvement in the case?

17 A No, ma'am. Not that I'm aware of.

18 Q Did you attend any briefings, meetings with the
19 State Attorney's office or your department about the case?

20 A No, ma'am.

21 Q Did you do any research into my client, Juan
22 Molina-Salles as far as his background or what he was
23 arrested for or anything like that?

24 A Not that I'm aware of. No, ma'am.

25 Q Anything that I haven't asked you about that you

1 did that day?

2 A No, ma'am.

3 MS. DELIBERATO: I don't have anymore questions.

4 I don't know if my co-counsel or the State does.

5 MS. BLAQUIERE: No, I don't.

6 MR. VONDERHEIDE: No questions.

7 MS. CONSTANTINE: No questions.

8 (Deposition concludes at 3:21 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 ALEXANDER FOSTER personally appeared before me and was
7 duly sworn.

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

10

11

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 ALEXANDER FOSTER; 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

