

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: ANTHONY CARUSO
TAKEN BY: Counsel for the Defendant
DATE: November 18, 2024
TIME: 1:07 p.m. - 1:16 p.m.
PLACE: ZOOM videoconference
REPORTED BY: Tamara M. Pacheco, RPR
Notary Public, State of FL

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ZOOM VIDEOCONFERENCE APPEARANCES

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EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 ANTHONY CARUSO

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. Could you please state and
8 spell your name for the record.

9 A Yeah. My name is Anthony Caruso, spelled
10 A-N-T-H-O-N-Y, last name C-A-R-U-S-O.

11 Q And how are you employed?

12 A I'm a deputy sheriff with the Pinellas County
13 Sheriff's Office.

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

18 We're here on Pinellas County Sheriff's case
19 number SO22-305232. I have that you authored just one
20 supplement, Supplement 38. Is that right?

21 A Yes. That's correct.

22 Q Did you have a chance to review it before
23 today's deposition?

24 A Yeah.

25 Q And if you need to refer to it at any time,

1 please, that's fine. Just let us know that's what you're
2 doing.

3 A Okay.

4 Q Can you just walk me through your law
5 enforcement background. When did you start with the
6 Sheriff's office?

7 A Yes. So I got hired by the Sheriff's office
8 back in February of 2018, so it's been almost seven years
9 now with Pinellas County. I worked patrol most of my
10 career. The last two-and-a-half years I've been with the
11 Home Task Force, assigned there. We deal primarily with
12 juvenile offenders on probation. Prior to Pinellas
13 County, I worked two years in the jail with Pasco County
14 Sheriff's Office as a detention deputy there.

15 Q Any prior law enforcement before that, before
16 the jail and then PCSO?

17 A No, nothing before that.

18 Q Okay. And this is a question I ask of
19 everybody. Have you ever had any complaints sustained
20 against you for any reason?

21 A Not that I can recall, no.

22 Q So at the time of this incident, September 22nd,
23 2022, do you have an independent recollection of this
24 scene?

25 A Of the scene? I never made it to the actual

1 scene, but the event, yes.

2 Q Okay. I assume that's because it was a fellow
3 deputy that was deceased. Is that right?

4 A Correct.

5 Q Okay. I assume sort of a routine traffic
6 accident you would not have otherwise had an independent
7 recollection. Is that fair to say?

8 A Yeah, that's fair.

9 Q Okay. So tell me a little bit -- you were on
10 duty that night just working?

11 A Yes. So that night I was working assigned to
12 the Home Task Force. So we go out, and we do curfew
13 checks on juveniles. We listen to all the radio channels.
14 That's when we heard stuff going on on the radio about a
15 possible accident with a deputy involved, so we all
16 started heading that way. We responded to the area.

17 Q When you say "we," were you by yourself in your
18 car, or did you have someone with you?

19 A It's me by myself in the car.

20 Q Do you get -- you're headed to the scene. Are
21 you getting any instructions along the way?

22 A For this event, no. It was kind of just try to
23 get to the area, and it was really -- we were getting
24 instructions to start shutting down the road on my way
25 there.

1 Q Did you actually ever make it to the place where
2 Deputy Hartwick had fallen deceased?

3 A No. I never made it to the actual area where he
4 was at, no.

5 Q The accident, you never saw him at all?

6 A No, I never saw him. Never got close enough to
7 the area.

8 Q And what did you -- it looks like you stopped at
9 Exit 30 and I-275 at Roosevelt?

10 A Yes. That's correct.

11 Q And you were just sort of directing traffic at
12 that point?

13 A Yeah. We were -- because it was a confusing
14 incident. We didn't actually know where it was at. So we
15 shut down that exit not knowing, you know, where we needed
16 to send people to get off the road. So, yeah, we shut
17 down that exit essentially at first.

18 Q And then was there another incident that
19 happened sort of kind of almost at the same time?

20 A Yes.

21 Q And what was that?

22 A Yeah, so a totally unrelated incident amidst
23 everything that was going on. There was a vehicle that as
24 traffic was getting diverted I guess went the wrong way
25 and ended up going off an overpass that was unfinished,

1 because it was big construction area, and it landed and
2 was upside down. So I responded to that to help pull the
3 guy out of the vehicle.

4 Q Were you actually one of the first deputies on
5 scene at that incident?

6 A Yes. I was one of a handful of guys that got
7 there pretty quickly.

8 Q And at the time, was it known whether that was
9 potentially related to Deputy Hartwick's incident, or was
10 it not known?

11 A At the moment it was unknown honestly if it was
12 related or not. We were assuming it was unrelated, but it
13 was still -- we were unsure.

14 Q Fair to say it was a pretty chaotic and
15 confusing scene that night?

16 A Yeah. That was one I'll never forget.

17 Q Understood. So after assisting that gentleman
18 out of the car that had fallen off the ramp, what did you
19 do next?

20 A After that, I went back to an on-ramp to
21 northbound 275 and shut that down just for traffic control
22 to make sure nobody was going northbound on 275 from
23 Roosevelt Boulevard.

24 Q Did you ever see my client, Juan Molina-Salles
25 once he was taken into custody?

1 A No. I never had contact with him, never saw him
2 or anything.

3 Q Did you, like, remember hearing anything about
4 radio traffic or saying that they found him or anything
5 like that?

6 A I think when they found him, I was off-duty by
7 then. I was just getting text messages from people saying
8 they caught him.

9 Q Okay. Anything you remember about those text
10 messages? Anything about the nature of them?

11 A No. Just a group chat with work. We got off
12 very late that morning and just -- we didn't know what was
13 going to happen next.

14 Q Did you know Deputy Hartwick personally or
15 professionally?

16 A I knew him professionally, yes. I had worked
17 with him before.

18 Q Okay. Any -- do you remember kind of the last
19 conversation you had with him before the accident?

20 A I know he was on light-duty for a little while,
21 and he was working at the NDS front desk. I spoke with
22 him briefly about just work and stuff there.

23 Q What's NDS?

24 A The North District Station, which is the
25 substation in Dunedin right by the Dunedin Causeway. It's

1 the Sheriff's office.

2 Q You said light-duty. Do you know why? Did he
3 have an injury or illness or something?

4 A I'm not a hundred percent sure why he was on
5 light-duty. Yeah, he was on desk duty for an injury or
6 illness or something.

7 Q Okay. Did he ever talk to you about the
8 construction detail, Archer Western Construction detail
9 that he would do sometimes?

10 A No. We never spoke about the detail.

11 Q Are you familiar with that detail at all?

12 A Before the incident, no. Since the incident, I
13 have worked it. Now I am, yes.

14 Q Okay. And when did you first start working that
15 detail?

16 A Probably just a few months ago actually
17 honestly.

18 Q Okay. Did they -- before you go out on your
19 detail, did they give you any kind of safety briefing?
20 Anything like that?

21 A It's not really a safety briefing. It's just we
22 meet up at a spot, and then we all get assigned where
23 we're going to go and shut down traffic or sit with our
24 lights on.

25 Q And do they have any protocol about if you're

1 out of the vehicle that you should be wearing a vest or
2 things like that?

3 A Not to my knowledge. I personally would put a
4 vest on now. Working it now, I would put my vest on if I
5 had to get out of my vehicle for any reason.

6 Q Then you said you never saw Mr. Molina-Salles.
7 Did you ever attend any meetings or briefings or anything
8 like that about this particular case?

9 A No, never -- I haven't spoken to any detectives
10 or anything. Just my role in this event was simply
11 traffic control.

12 Q Did you do any research about my client or about
13 where he came from or any of his specific background
14 information?

15 A No, I haven't.

16 Q Do you remember reading any newspaper articles
17 or anything like that about it?

18 A No, just maybe the post that the Sheriff's
19 office put out after it all happened.

20 Q Okay. Anything specific about that that jogs
21 your memory as we sit here today?

22 A No, nothing that I can recall.

23 Q Okay. Anything else that you did or observed
24 that night that I haven't asked you about?

25 A No. No. That's pretty much all that . . .

1 Q Have you understood all my questions today?

2 A Yes, I have.

3 Q And answered them to the best of your ability?

4 A Yes, ma'am.

5 MS. DELIBERATO: I don't have any further
6 questions. I'm not sure if my co-counsel or State
7 does.

8 MS. BLAQUIERE: No.

9 MR. VONDERHEIDE: No questions.

10 MS. DELIBERATO: Thank you so much.

11 (Deposition concludes at 1:16 p.m.)

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COUNTY OF PINELLAS)
STATE OF FLORIDA)

CERTIFICATE OF OATH

I, the undersigned authority, certify that
ANTHONY CARUSO 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 ANTHONY CARUSO; 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

