

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:

BRADLEY BYERS

TAKEN BY:

Counsel for the Defendant

DATE:

November 18, 2024

TIME:

11:43 a.m. - 12:01 p.m.

PLACE:

ZOOM Videoconference

REPORTED BY:

Tamara M. Pacheco, RPR  
Notary Public, State of FL

Pages 1 - 17

JTP REPORTING (727)422-8287

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## EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 BRADLEY BYERS

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. BLAQUIERE:

7 Q All right. Please state your full name for the  
8 record.

9 A Bradley Alan Byers.

10 Q And you're a deputy, correct?

11 A I am retired.

12 Q Okay. Congratulations. You were recently a  
13 deputy, correct?

14 A I retired last -- two years ago this past  
15 October, so not recently.

16 Q Okay. When did you retire?

17 A October of 2022. I was on this case.

18 Q I'm aware.

19 A Okay.

20 Q Can you state the basis of your retirement?

21 A I did seven months of DROP, and I retired out of  
22 the K9 Unit after being in there for almost ten years.

23 Q Okay. Can you go over your full law enforcement  
24 background and experience, please.

25 A Twenty-six years with Pinellas County Sheriff's

1 office. I started January 3rd, 1994 until my retirement.

2 Q Have you ever had any work complaints sustained?

3 A No.

4 Q And you authored a report in this case. Do you  
5 have a copy of it?

6 A No, I do not.

7 Q Okay. Do you have any independent memory of  
8 your involvement in this case aside from your report?

9 A No, nothing besides my authored report that was  
10 a supplement.

11 Q Have you had a chance to review it since you  
12 retired in October of 2022?

13 A No, ma'am.

14 Q Okay. Let's see if there's anything you do  
15 remember the night Deputy Michael Hartwick passed away.  
16 Do you remember what your involvement was?

17 A I was working north county at the time assigned  
18 for K9 patrol coverage with my partner Troy, who is at the  
19 time FDLE. We were state certified. I went down and  
20 assisted with our other handlers for tracking the  
21 defendant.

22 Q Do you when you started your shift that evening  
23 for tracking with K9 Troy?

24 A My shift started -- I'd have to -- you'd have to  
25 look at my CAD log-on. My shift generally was 8 p.m. to

1 6 -- excuse me, 2000 hours to 0600 hours was my standard  
2 shift. I can't remember the day of the week it was, but  
3 it was during one of my regular shift hours.

4 Q Okay. September 23rd was -- September 22nd,  
5 2022 was a Thursday.

6 A That sounds correct.

7 Q Okay. Do you remember seeing -- can you  
8 describe the scene for me, what you remember that evening?

9 A It was along the interstate, a lot of road  
10 blockage, road construction. They were working on setting  
11 up a command center. We were searching areas along the  
12 interstate, and then I transitioned to conducting searches  
13 along frontage road areas and apartment complexes. And  
14 then I responded to calls of possible sightings of the  
15 description that was put out that witnesses were calling  
16 in to the Sheriff's office at the time.

17 But I would really have to -- I've been retired  
18 two years. I just got served the subpoena two weeks ago  
19 by phone, and I would really like to review my report.

20 Q Okay. I can share the screen that has your  
21 report.

22 A I just don't have that ability.

23 Q Okay. I can share your report with you. This  
24 is what you're seeing on the screen.

25 A Okay. Perfect.

1 Q Let me know when you're done.

2 (Pause. Deponent reviews report.)

3 A Okay.

4 Q Okay. Do you recall seeing the front-loader?

5 A Yes, I do. That is when I was running as backup  
6 to Corporal Aitken and K9 Taco, and we were working along  
7 the areas of where the defendant's traffic vest was  
8 located. And I believe that was under the first  
9 deployment of Deputy Lorusso and Deputy Fineberg, and we  
10 began -- I accompanied Corporal Aitken at that time with  
11 his partner on that search. I did not have my dog  
12 deployed as I was backup. We were working -- Corporal  
13 Aitken was working his K9, Taco.

14 Q Where was your dog?

15 A He was in my car waiting. You don't deploy two  
16 dogs at the same time next to each other. And due to  
17 those type of charges, we always run as backup to each  
18 other.

19 Q Okay. So do you like relieve K9 Taco when he  
20 needs a break?

21 A Yes. When the dog gets tired, we'll put that  
22 dog up, and then we'll get the next dog up, which, you  
23 know, could have been K9 Troy at that time. But reading  
24 the report, we reconvened, and I deployed at areas where  
25 there were possible sightings working with our Sheriff's

1 office Flight Unit, checking those hotspot areas in the  
2 frontage area of the wooded area to the adjacent apartment  
3 complexes.

4 Q Did you see anything that would emit the heat  
5 signatures that Eagle was telling you about?

6 A No. My dog is -- Troy is only trained to alert  
7 on human scent. A heat signature can be generated by many  
8 things to the IR on the helicopter. So we checked those  
9 areas, and there wasn't any human beings in those hot  
10 spots that were checked. When I say "hot spots," they're  
11 heat signatures to the thermal for the Flight Unit.

12 Q Were they communicating with you on your radio  
13 on your uniform?

14 A That's correct, ma'am.

15 Q And how far away was the search from the  
16 front-loaders?

17 A I couldn't tell you exactly. Everything was  
18 generally within a mile radius I would say. That's an  
19 estimate. It was in close enough proximity given the  
20 timeframe that somebody could have gotten there on foot,  
21 you know, from the time that we were searching to the time  
22 the incident occurred.

23 Q Did you search outside of the Gandy Boulevard  
24 and Roosevelt Boulevard exits on 275?

25 A I responded to some calls in Feather Sound.



1 That's kind of in that corridor at apartment complexes  
2 near the Feather Sound area. I did respond to those  
3 locations when we started getting some calls, as it's  
4 dictated in my report, but they were met with negative  
5 results.

6 Q Did you encounter anyone with relevant  
7 information -- anyone else with relevant information in  
8 the Feather Sound area?

9 A No, ma'am.

10 Q Were the hardhat and vest found near the  
11 front-loaders?

12 A Fifty yards, a hundred yards. They were in  
13 close enough proximity where you could see the crime scene  
14 or what was determined at that time as a possible crime  
15 scene. It was in a wooded area along a fence-line along  
16 the interstate from my recollection.

17 Q Were you on scene when deputies did eventually  
18 find Juan Molina-Salles?

19 A I was at the command post when they -- when the  
20 defendant was located. Because of the time lapse now  
21 involved -- we did not have bloodhounds at the time, and  
22 under mutual aid, Pasco County Sheriff's Office came down  
23 and worked their bloodhound, accompanied with some of our  
24 K9 handlers as backup. But I was at the command post. I  
25 wasn't at the actual location where he was found.

1           Q     Did you have any interaction with any of the lay  
2 witnesses on scene that day, including Mr. Juan  
3 Molina-Salles?

4           A     I did not.

5           Q     Do you know -- did you know Deputy Hartwick  
6 either professionally or off-duty?

7           A     I knew him personally and professionally.

8           Q     Okay. How long did you know him?

9           A     His entire career with the Sheriff's office.

10          Q     Okay. How long were you -- would you consider  
11 yourself friends with Deputy Hartwick off-duty?

12          A     Yes. We were -- we were -- we didn't go out to  
13 dinner or things like that, but we would on occasion meet  
14 between calls and working shifts. He worked the  
15 night-shift. I worked the night-shift. So we would have  
16 conversations in passing.

17          Q     Did he ever make any statements about the Archer  
18 western detail he was working extra shifts for?

19          A     No.

20          Q     Can you hear me?

21          A     Yes, I can hear you. I said no.

22          Q     I apologize, I didn't hear your answer. That --  
23 did you have -- when was the last time you talked to him  
24 prior to his passing?

25          A     I don't recall the exact time, but maybe a

1 couple of weeks prior to Deputy Hartwick's passing. He  
2 was always talking to me because I had announced my  
3 retirement and my upcoming retirement. He was getting  
4 close to that time, and he was excited about that.

5 Q Did he speak of any other parts of his emotional  
6 state? Was he depressed or anxious, anything like that  
7 during that period right before he passed away?

8 A No. No. He was fine.

9 Q Okay. He wore hearing aids?

10 A I don't know if he wore hearing aids or not to  
11 be perfectly honest with you.

12 Q Eyeglasses?

13 A Yes. Yeah. We always would make comments we  
14 ain't getting any younger doing this job.

15 Q Do you know if his eye prescription was current?

16 A I have no idea.

17 Q Okay. I just didn't know if he ever mentioned  
18 anything like he needed a better set of glasses.

19 A No, ma'am.

20 Q Did you ever work the Archer Western  
21 construction detail?

22 A No, ma'am.

23 Q Have you done any research about this case or my  
24 client, Mr. Juan Molina-Salles?

25 A No, ma'am. I've been retired for two years. I

1 am -- my only involvement with the Sheriff's office is  
2 still responding to subpoenas even after two years passed.

3 Q How do they pay you for that?

4 A That's a good question. My house is flooded,  
5 and I'm doing construction on my house and sitting on my  
6 front porch. I'm just happy this was a Zoom call. Every  
7 time I go down to the courthouse for any depo in the past,  
8 it's always been canceled the last day and I don't get  
9 notified. I just retired. So I have to chalk it up to 26  
10 years of service to our community, have a nice day.

11 Q Yeah. Well, I appreciate your time this  
12 morning. Was there any other involvement that day that  
13 you can recall that you haven't already discussed?

14 A No, ma'am.

15 Q Have you been able to understand all of my  
16 questions?

17 A I understand them.

18 Q Have you been able to answer them all completely  
19 and accurately?

20 A Yes, ma'am.

21 Q And were you part of any briefings about this  
22 case after Mr. Juan Molina-Salles' arrest?

23 A No, I was not. I want to say it was  
24 approximately a week-and-a-half before my retirement. I  
25 don't have any involvement other than my night working. I

1 think that was like my last week working.

2 Q Probably. And then I think my last question,  
3 you didn't have any -- you don't touch the hardhat or vest  
4 or anything like that that was located?

5 A You kind of got jumbled on that. I didn't touch  
6 what?

7 Q You didn't touch or have anything to do with  
8 collection of the hardhat or vest that day, correct?

9 A No.

10 MS. BLAQUIERE: Okay. I don't have anymore  
11 questions. I don't know if Ms. DeLiberato does.

12 EXAMINATION

13 BY MS. DELIBERATO:

14 Q I just have one question, deputy. Thank you so  
15 much. Did you see Mr. Molina-Salles when he was put into  
16 custody? I know you said you were at the command post,  
17 but did you actually lay eyes on him?

18 A I did not lay eyes on him.

19 MS. DELIBERATO: Thank you so much. I don't  
20 have anymore questions. Enjoy your retirement.

21 THE DEPONENT: Okay. Thank you.

22 MS. BLAQUIERE: Thank you so much. Do you want  
23 to read or waive your right to review your deposition  
24 transcript?

25 THE DEPONENT: I haven't been retired that long.

1 If I ever get subpoenaed for anything, it's always  
2 read.

3 MS. BLAQUIERE: Ms. Tammy will forward that to  
4 Ms. Constantine and give you a chance to read it.

5 (Deposition concludes at 12:01 p.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 BRADLEY BYERS personally appeared before me and was duly  
7 sworn.

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

10  
11 Tamara M. Pacheco

12 Tamara M. Pacheco, RPR  
13 COMMISSION # 474485  
14 EXPIRES: March 30, 2028  
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## 1 CERTIFICATE OF REPORTER

2 STATE OF FLORIDA )

3 COUNTY OF PINELLAS )  
4

5 I, Tamara M. Pacheco, certify that I was  
6 authorized to and did stenographically report the  
7 Deposition of BRADLEY BYERS; that a review of the  
8 transcript was requested; and that the transcript is a  
9 true and complete record of my stenographic notes.

10 I further certify that I am not a relative,  
11 employee, attorney or counsel of any of the parties, nor  
12 am I a relative or employee of any of the parties'  
13 attorney or counsel connected with the action, nor am I  
14 financially interested in the action.

15 Tamara M. Pacheco16 Tamara M. Pacheco, RPR  
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# ERRATA SHEET

IN THE CASE OF:        STATE OF FL v. JUAN MOLINA-SALLES

NAME OF DEPONENT: BRADLEY BYERS

CASE NUMBER: 22-09348CFANO

Please read the transcript of your deposition.  
If you feel you need to make corrections, please note on  
this page. DO NOT mark on the transcript itself.  
Sign and date the transcript below.

PAGE	LINE	ERROR/AMENDMENT	REASON FOR CHANGE
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This image shows a blank sheet of white paper with horizontal blue ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper has a slight shadow on the right side, suggesting it's part of a bound notebook or folder.

Signature

Date