

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:

DAVID DEANGELO

TAKEN BY:

Counsel for the Defendant

DATE:

November 18, 2024

TIME:

3:04 p.m. - 3:14 p.m.

PLACE:

ZOOM videoconference

REPORTED BY:

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

Pages 1 - 15

JTP REPORTING (727)422-8287

ZOOM VIDEOCONFERENCE APPEARANCES

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## EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 DAVID DEANGELO

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

9 A David DeAngelo, D-E-A-N-G-E-L-O.

10 Q And how are you employed?

11 A With Pinellas County Sheriff's Office.

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

16 We're here on PCSO case number 22-305232. I  
17 have that you authored one supplement, Supplement 96. Is  
18 that right?

19 A That's correct, yes.

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

22 A Yes.

23 Q Okay. If you need to refer to it at all during  
24 your depo, perfectly fine. I have a copy here if you need  
25 it.

1           A     I have a copy.

2           Q     Before we get into that, can you walk me through  
3 your law enforcement background a little bit. How long  
4 have you been with PCSO?

5           A     I've been with the Sheriff's office for about 28  
6 years. I started off in the jail. I'm currently assigned  
7 to patrol as a patrol corporal.

8           Q     Any law enforcement experience before PCSO?

9           A     No. I got hired at nineteen.

10          Q     Okay. In your 28 years with PCSO, ever had any  
11 complaints sustained against you for any reason?

12          A     No.

13          Q     Did you know Deputy Hartwick personally?

14          A     Yes. I worked in the jail with him, and then I  
15 worked in patrol with him.

16          Q     Okay. Did you socialize outside of work as  
17 well?

18          A     No.

19          Q     Do you remember the last time you had seen him  
20 before the accident?

21          A     I believe it was at a training. Yeah, I think  
22 it was a training for either like -- kind of like for riot  
23 situations. He was an attendee. I was one of the people  
24 assisting and helping train.

25          Q     Do you remember about how long before the

1 accident that was?

2 A I don't remember, no.

3 Q Do you remember anything specific about the  
4 conversation that you had with him or just sort of  
5 exchanging pleasantries?

6 A Talking about retirements.

7 Q He was getting close?

8 A All the guys who were veterans.

9 Q Did he ever talk to you about the Archer Western  
10 construction detail at all?

11 A No.

12 Q Did you ever do that Archer Western Construction  
13 detail?

14 A No, ma'am.

15 Q Did you know anything about it or hear anything?

16 A I'm familiar. I don't really do details, so I  
17 don't really pay attention to most of them. Unless  
18 they're really short on something, they ask. I know it's  
19 an overnight detail. That's all I'm aware of.

20 Q How was it that you got called out to this  
21 particular scene? Were you working that night?

22 A No. Actually, I was off. I'm currently on  
23 SWAT. I'm the Technical Response Team Leader. With that,  
24 I'm in charge of the robots and drones, and I was called.  
25 We just recently -- at that time, we just received some

1 new drones, and I attempted to use some 2D and 3D mapping  
2 of the scene. So that was pretty much all my involvement  
3 was. I was given an area, a parameter to kind of take  
4 ariel photos, and that was it.

5 Q was this kind of the first time you had used  
6 these new particular drones?

7 A Yes. On an actual case, not training.

8 Q So it looks like you were called out the next  
9 morning. About 8 a.m. is when you were sort of instructed  
10 to start to deploy those?

11 A Yes.

12 Q Did you ever -- I assume Deputy Hartwick was  
13 already removed from the scene at that point. Is that  
14 right?

15 A Oh, yeah. Correct.

16 Q Did you ever see my client, Juan Molina-Salles  
17 taken into custody?

18 A No, ma'am.

19 Q Were you -- when you were deployed for the ariel  
20 photos, do you know if the search for him was ongoing, or  
21 had they concluded the search and you were doing just  
22 photograph evidence?

23 A Honestly, I don't remember. I think he might  
24 have been in custody prior to my arrival, but I'm not  
25 really sure.

1 Q Okay. So it looks like from your report you  
2 were asked to conduct a 3D scan of where his cruiser was  
3 located?

4 A Uh-huh.

5 Q And then you did a 3D scan of the two parked  
6 construction vehicles?

7 A Correct.

8 Q And that was the -- that was the digital  
9 photographs and videos. So when you do that, just explain  
10 it to me like I have no idea what I'm talking about, which  
11 is true. How does it work?

12 A So basically, yeah, we give the parameters of  
13 where the drone is going to take video or -- not video but  
14 actual imaging to basically conduct a 3D map through  
15 another program. So what we did on this case is we said,  
16 hey, this is the outside perimeter of where we want  
17 captured. Everything inside is what they want captured.  
18 I basically set the drone up to capture what they needed.  
19 The drone then determines based on height, how many  
20 pictures it needs, and the angles it needs to go, and  
21 basically, it's all synced. So we're just basically the  
22 pilot to set up the parameters, and the drone does the  
23 rest of the work.

24 Q And with all that footage and photographs, are  
25 you able to measure accurate distances between things and



1 stuff like that?

2 A It's -- it does have a percentage of accuracy.  
3 I'm sorry, I don't know the exact percentage of what it  
4 is. But, yeah, when you enter it into -- like I said, we  
5 were testing out new 2D, 3D mapping type programs. So  
6 when you enter it in there, they have some -- they usually  
7 have a tool there to help measure or give you an  
8 approximate distance.

9 Q And why this particular case to use these sort  
10 of new tools? Because it's kind of the high-profile  
11 nature? Any particular reason?

12 A No. It was just something that I think my  
13 supervision believed might be able to be helpful. It was  
14 something new. And as a matter of fact, we kind of do it  
15 on most of our cases now for our major accidents and stuff  
16 like that.

17 Q And what kinds of things would it be helpful  
18 for? Like, I just want to understand from an evidentiary  
19 perspective what makes this a better tool.

20 A So just as pictures help to provide a story of  
21 the scene as it's happened or after it's occurred, this  
22 just kind of helps add to that. Because it can be --  
23 these photos can be basically melded together to give you  
24 kind of like a 2D or even depending on if you do a 3D map  
25 of actually walking through the scene. So it's kind of

1 that. Like I said, it was new. First time we've really  
2 conducted one on any case. That's kind of what it's used  
3 for, to kind of add additional photos to the storyboard.

4 Q And it's called the Skydio? Is that how you say  
5 it? S-K-Y-D-I-O.

6 A That was a Skydio X2 is what we used.

7 Q Do you have to have any particular training on  
8 how to operate it?

9 A Yeah. We have to all be Part 107. So it's an  
10 FAA regulation for any law enforcement or any commercial.  
11 So if you receive payment, whether it's government or  
12 whether it's private, you have to have a Part 107 license.

13 Q And you I assume have that?

14 A Yes, ma'am.

15 Q You note in your report that all videos and  
16 photographs reference the supplement were transferred to  
17 case number -- and it's a different case number --  
18 22-309082. Do you know why it's a different case number?

19 A So it was what I think one of the case agents --  
20 I'm not sure if it was Detective Syers or if it was  
21 forensics. Somebody asked that it be -- that they were  
22 going to document all their stuff to that other case  
23 number. I don't really remember exactly who it was or why  
24 it was at that time, but that's the case number they  
25 wanted all our video or all our photos documented under.

1 Q Okay. So it's different than the 305232. I  
2 just want to make sure that we -- I'm pretty sure we have  
3 all that, but I want to make sure we have access to it on  
4 evidence.com because it's under a different number.

5 A It's there.

6 Q But it's still involving Deputy Hartwick and all  
7 that?

8 A Yes.

9 Q There was a secondary incident that night, a car  
10 that had driven off a bridge.

11 A Oh, yeah. That's not -- yeah, that's not any  
12 related case number that I had.

13 Q Okay. You came out to do the Deputy Hartwick  
14 scene?

15 A Yes, ma'am.

16 Q Okay. Any other involvement?

17 A No. That was it.

18 Q Did you --

19 A The photos were uploaded. That was it. That  
20 was the end of my involvement.

21 Q Did you attend any briefings or meetings either  
22 in your department or with the State Attorney's office  
23 about this case?

24 A No, ma'am.

25 Q Did you do any research or any investigation

1 into the background of my client, Mr. Molina-Salles or  
2 anything that he's charged with or anything like that?

3 A No, ma'am.

4 Q Anything that I haven't asked you about what you  
5 did here today?

6 A No. It's pretty simple what I did this time.

7 MS. DELIBERATO: I don't have anymore questions.  
8 I'm not sure if my co-counsel or if the State does.

9 MS. BLAQUIERE: No. Thank you.

10 MS. DELIBERATO: Thank you so much. I  
11 appreciate you logging in.

12 (Deposition concludes at 3:14 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 DAVID  
6 DEANGELO personally appeared before me and was duly sworn.

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

9  
10 *Tamara M. Pacheco*

11 Tamara M. Pacheco, RPR  
12 COMMISSION # 474485  
13 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 DAVID DEANGELO; 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. Pacheco*16 Tamara M. Pacheco, RPR  
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IN THE CASE OF: STATE OF FL v. JUAN MOLINA-SALLES

NAME OF DEPONENT: DAVID DEANGELO

CASE NUMBER: 22-09348CFANO

PAGE	LINE	ERROR/AMENDMENT	REASON FOR CHANGE
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Date