

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:

WARREN CHRISS

TAKEN BY:

Counsel for the Defendant

DATE:

November 18, 2024

TIME:

1:23 p.m. - 1:31 p.m.

PLACE:

ZOOM Videoconference

REPORTED BY:

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

Pages 1 - 14

JTP REPORTING (727)422-8287

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

INDEX

WARREN CHRISS	PAGE:
Examination by Ms. DeLiberato.....	4
Certificate of Oath.....	12
Certificate of Reporter.....	13
Errata/Signature Page.....	14

EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 WARREN CHRISS

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

9 A Warren Chriss, W-A-R-R-E-N, C-H-R-I-S-S.

10 Q And how are you employed?

11 A I'm employed with Allied Universal Security
12 Services.

13 Q Did you used to be a Pinellas County Sheriff's
14 deputy?

15 A I did, yes.

16 Q And what were the dates of your employment
17 there?

18 A Off the top of my head, I believe it was
19 September either 9th or 10th, 2018 through October 17th of
20 2023.

21 Q My name is Maria DeLiberato. I'm an assistant
22 public defender. Myself and Nichole Blaquiere represent
23 Juan Molina-Salles. Present for the state is Nathan
24 Vonderheide and Elizabeth Constantine.

25 We're here for your deposition today. It's from

1 when you were a PCSO deputy, case number SO22-305232. I
2 have that you authored just one supplement, Supplement 3.
3 Have you had a chance to review that before your
4 deposition today?

5 A I have not.

6 Q Do you need to review it before your deposition
7 today?

8 A I'd like to, yes.

9 Q Okay. I should be able to share my screen with
10 you hopefully. It's very short. Do you have an
11 independent recollection of this particular incident?

12 A Off the top of my head, I believe this was when
13 our deputy was killed I think that night. We were flying.

14 Q Yes. The construction accident off of 275. The
15 notes say that you were a tactical flight deputy. I'm
16 about to share my screen so you can see it. It's a very
17 short report.

18 A Okay.

19 Q Are you able to see that?

20 A Yes.

21 Q Just take a look, and let me know when you're
22 finished.

23 A Okay.

24 (Pause. Deponent reviews report.)

25 A Okay.

1 Q Great. And I'll leave it up. So if there's
2 anything you need to refer to, that's fine. Before we get
3 into that though, can you walk me a little bit through
4 your law enforcement background. You said you started
5 with PCSO September 2018 through October of '23. Any
6 prior law enforcement experience before that?

7 A Yes. I worked for the Clearwater Police
8 Department April 2015 up until the date of employment with
9 PCSO, either that 9th or 10th. I ended on a Friday and
10 started PCSO on Monday.

11 Q Anything other than PCSO and Clearwater?

12 A Not law enforcement, no.

13 Q And why did you leave PCSO in October of '23?

14 A Family. Family moved me up to Chicago.

15 Q Okay. This is a question I ask of everyone.

16 Any complaints sustained against you either at Clearwater
17 PD or PCSO?

18 A I don't believe so, no.

19 Q Okay. So tell me a little bit about your role
20 at the time of this, September 22, 2022. You were a
21 tactical flight deputy. What does that mean?

22 A So, yeah, I was in our Aviation Unit at the
23 Sheriff's office. Tactical flight deputy is the person
24 who's in the aircraft operating mission equipment, so like
25 the camera, radios -- police radio I should say, and you

1 have a pilot as well. I operated in both roles that
2 night, but typically, you only author a report for your
3 tactical flight deputy involvement because you're
4 obviously looking for evidence.

5 Q If you're flying the plane, you're not looking
6 for evidence.

7 A No. You're just getting from point A to B
8 safely.

9 Q But you are capable of flying the plane.
10 Sometimes you do fly the plane. Is that right?

11 A I did, yes. It was a helicopter. I wasn't
12 licensed to fly our plane, but we were flying a helicopter
13 this night.

14 Q The helicopter. Okay. So who was the pilot
15 that night? Do you remember?

16 A Corporal Paul Rogers.

17 Q Okay. And it looks like his note is on your
18 report. That's who would have approved your report?

19 A Yes.

20 Q So what do you remember about the call-out, and
21 how was it you got called out to do this?

22 A I mean, independent recollection, it was just
23 the typical radio call. It was obviously pretty close
24 proximity to the airport where we take off and land from,
25 so got there relatively quick. Short of that -- again, I

1 flew the first -- I think we flew a couple of times on
2 this call because we didn't have all the details and
3 whatnot. I flew on the first primary call, and then later
4 on that evening or morning I guess, we refueled and got
5 back up at whatever commander's request.

6 Q And can you kind of explain to me how you're
7 doing this search? You said I began to search the wooded
8 area. I mean, what kind of equipment do you have to do
9 the search from the air?

10 A So we have a camera, infrared obviously for
11 nighttime purposes, and then we have a computer system
12 where we can type in addresses, and then we also are
13 operating the radio, police radio as well. So those are
14 the three main pieces of equipment.

15 Q Is there anything that you all do that detects
16 the heat, the heat source from a person or something like
17 that?

18 A That's what I was referring to about the
19 infrared.

20 Q That's the infrared. Okay. So you can sort of
21 see whether there's maybe a person or living thing if
22 they're throwing off some heat?

23 A Yes, possibly.

24 Q Okay. And what did you -- while you were
25 searching, did you locate anything of evidentiary value

1 from the air?

2 A I don't believe so, no.

3 Q It just says units advised they located some
4 articles of clothing, but that wasn't anything that you
5 were able to see from the air?

6 A I don't recall if I did or not.

7 Q I assume if you had, you would have noted that
8 in the report. Is that fair to say?

9 A Yes.

10 Q Okay. And it looks like, basically, you
11 eventually just had to refuel, and then you were relieved
12 by the day-shift crew later at that point?

13 A Yes.

14 Q All right. So you actually never, at least
15 according to your report, found any items of evidentiary
16 value?

17 A No, I don't believe so.

18 Q Do you remember, did you actually get to the
19 traffic accident scene itself?

20 A Like outside of an aircraft?

21 Q Yes.

22 A No, I never went to it.

23 Q Okay. Did you ever observe my client, Juan
24 Molina-Salles be taken into custody or any of that?

25 A I did not, no.

1 Q Did you remember hearing anything either on the
2 radio or any kind of group chat with other officers about
3 anything about his arrest or about him?

4 A No.

5 Q Did you do any research into this case after the
6 fact about Mr. Molina-Salles or what he was charged with
7 or anything about his background?

8 A No.

9 Q Do you know -- did you know Deputy Hartwick
10 either personally or professionally?

11 A I had seen him, but I didn't know him very well,
12 no.

13 Q Okay. Do you recall any specific conversations
14 you may have had with him or anything like that?

15 A No.

16 Q Did you know anything about the Archer Western
17 Construction detail?

18 A I knew that it existed. I obviously have
19 friends and whatnot that work at the Sheriff's office, and
20 people that worked in patrol would typically work the
21 detail. Short of that, I don't know anything about it.

22 Q You yourself never worked that patrol, correct?

23 A I did not.

24 Q Okay. After this, did you attend any meetings,
25 briefings either within your department or at the State

1 Attorney's office about this case at all?

2 A Not to my knowledge, no.

3 Q And I assume, other than our deposition here
4 today, nobody has sat down and asked you a bunch of
5 questions about this. Is that right?

6 A Correct.

7 Q Anything that I haven't asked you that you
8 remember specifically from that night?

9 A No.

10 MS. DELIBERATO: I don't have any other
11 questions. I don't know if my co-counsel does or if
12 the State does. Everyone's screen is dark, so I'm
13 going to assume no.

14 MS. CONSTANTINE: No questions from me.

15 MS. DELIBERATO: Thank you so much. I
16 appreciate your time. Stay warm in Chicago.

17 (Deposition concludes at 1:31 p.m.)

18

19

20

21

22

23

24

25

1 COUNTY OF PINELLAS)

2 STATE OF FLORIDA)

3 CERTIFICATE OF OATH

4
5 I, the undersigned authority, certify that
6 WARREN CHRISS 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
15
16
17
18
19
20
21
22
23
24
25

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 WARREN CHRISS; 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
17
18
19
20
21
22
23
24
25

ERRATA SHEET

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

NAME OF DEPONENT: WARREN CHRISS

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
------	------	-----------------	-------------------

Signature

Date