## 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: SANDRALEIGH KING COPELAND

TAKEN BY: Counsel for the Defendant

DATE: November 20, 2024

TIME: 11:30 a.m. - 11:39 a.m.

PLACE: ZOOM Videoconference

REPORTED BY: Tamara M. Pacheco, RPR

Notary Public, State of FL

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## ZOOM VIDEOCONFERENCE APPEARANCES

ELIZABETH CONSTANTINE, ESQUIRE
Assistant State Attorney
14250 49th Street North
Clearwater, Florida 34620
Attorney 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** SANDRALEIGH KING COPELAND PAGE: Examination by Ms. Blaquiere.....4 Certificate of Oath......11 Errata/Signature Page......13 **EXHIBITS** (No exhibits were marked for identification.)

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1
     WHEREUPON,
 2
                      SANDRALEIGH KING COPELAND
     (the deponent herein, being first duly sworn, was examined
 3
 4
     and testified as follows:)
 5
                             EXAMINATION
 6
     BY MS. BLAQUIERE:
               State your name for the record.
 7
          Q
               Sandraleigh Copeland.
 8
          Α
               And did you recently have a name change?
 9
          0
               Yes. I was previously King.
10
          Α
11
               Okay. Thank you. I have that you authored two
          Q
     supplements in this case, Supplement 60 and 101.
12
13
     correct?
14
          Α
               Yes.
               Any others?
15
          Q
16
          Α
               No.
17
               Have you ever done a deposition before?
          Q
18
               Yes, I have.
          Α
               Okay. Great. If you don't understand my
19
          0
     question, just say so. If you need me to rephrase it,
20
21
     I'll do so. Just wait until I finish the question so that
    Tammy, the court reporter doesn't have to figure out who
22
     is saying what when.
23
24
               Okay.
          Α
               And then where are you currently employed?
25
          Q
```

1	A With the Pinellas County Sheriff's Office in the		
2	Forensics Division.		
3	Q How long have you been so employed?		
4	A Nine years.		
5	Q Any law enforcement experience before this?		
6	A No.		
7	Q What was your education background to achieve		
8	your employment status?		
9	A I have a bachelor's in psychology, and I also		
10	have an associate's degree and crime scene certificate in		
11	crime scene technology.		
12	Q Can you tell me what led you to be called out to		
13	this case back September 22nd, 2022?		
14	A Yes. So I believe I was working this night here		
15	at the office, and we received a call about a department		
16	death. I responded to the scene, along with Assistant		
17	Supervisor Sanford and some other members.		
18	Q Okay. What did you what were you instructed		
19	to do on this case once you got to the scene?		
20	A It was a little convoluted. Basically, I was		
21	requested to photograph Deputy Hartwick and to collect		
22	various items that had been that photo markers had been		
23	placed next to.		
24	Q Do you remember about when you made it out to		
25	the scene that evening?		

In my report, it shows that I was pulled out at 1 2 about 1:15 in the morning and arrived at 1:23. 3 What was your normal shift hours? 0 4 I believe it was probably 11 p.m. to 7 a.m. Α I reviewed your two reports mostly about 5 0 photography of the scene and then Deputy Hartwick. 6 a couple of questions just out of curiosity. I believe 7 8 you collected some food items that were found on scene by 9 Deputy Hartwick. 10 Α Yes. And then you put them in an arson can? 11 Q 12 Yes. Α 13 Why? Q 14 Basically, the arson can preserves the evidence. That way nothing can get into it. If it had been placed 15 into, like, a paper bag, it would have either -- you know, 16 because one of them was a tomato, pizza crust. So it 17 18 would have either leaked, or it would have been 19 susceptible to having ants or something else go through 20 it. 21 Okay. Do you know if anything has been done Q 22 with those food items since you collected them? 23 I'm not sure. Α Okay. And then it looks like in -- you're 24 0 referenced in Supplement 45, in Detective Charles 25

```
Blumberg's supplement where you helped him place photo
 1
 2
     markers down.
 3
               Okav. I don't recall.
          Α
 4
               Do you have access to that?
          0
 5
               No, I don't have access to his supplement.
          Α
 6
               Okay. I can share the screen. Can you see the
          Q
 7
     screen now?
 8
               Yes.
          Α
               So Charles Blumberg, Supplement 45.
 9
          0
10
          Α
               Okay.
11
               Fast forward further down. So I have here you
          Q
     and Specialist Mauck helped with the photo markers,
12
13
     placing them down 1 through 23 and then photo marker 27.
14
          Α
               Okay.
15
               Do you see that?
          Q
16
          Α
               Yes.
               Do you recall any of that work?
17
          Q
18
               I would have gone -- seeing as we have the photo
19
     markers, it would be at the direction of Detective
20
     Blumberg as to where he wanted the photo markers.
               And then do you remember some of the things that
21
          Q
     you may have collected from Deputy Hartwick besides --
22
23
          Α
               NO.
24
               -- the food items?
          Q
                     So I have a list of the things that I did
25
               Yes.
```

```
collect. So I collect several things from his person,
 1
 2
     like his Taser, Taser cartridges, magazine, round, his
     gun, a set of keys, his boots, his socks, his ballistic
 3
 4
     vest, and then also -- also a gold in color chain and a
     cross pendant, his watch, eyeglasses, a handcuff key, and
 5
 6
     his agency radio.
               Okay. And were all those things right around
 7
          Q
 8
     within an inch of his body or within a feet or two of his
 9
     body that evening?
               Yes. Most of it was, yes.
10
          Α
               And amongst those items, was there also a
11
          Q
12
     hearing aid that was noted?
               I believe I did see some, yes, at photo marker
13
14
     6.
               And who collected the hearing aid?
15
          Q
16
               I would have to look at the -- I don't think I
17
     did, so I would have to look at the property report.
18
               Okay. Was the hearing aid found within all
          Q
19
     those other things that you just listed --
20
               I believe it was close by him, yes.
               Okay. You're doing great. Just let me finish
21
          Q
     the question before you answer. Because I know you're
22
     going to know all these questions. I just want to get
23
24
     them all on the record. Okay?
```

25

Α

Okay.

```
And then any other involvement in this case
 1
          Q
 2
     besides the things that you photographed and that you
     collected in your reports?
 3
 4
          Α
               No.
               Did you go to the MEO's office that day and
 5
          Q
     assist with photography?
 6
               I did not, no.
 7
          Α
               Okay. Or did you go to the MEO for any other
 8
          0
 9
     reason that day?
10
               I did not, no.
          Α
               Anything else in this case that we haven't
11
          Q
     talked about or that's documented in your two reports?
12
13
          Α
               No.
14
               Have you understood all my questions so far?
          Q
15
          Α
               Yes.
                       Have you been involved in any briefings
16
          0
               Great.
     either for the Sheriff's office or the State Attorney's
17
     office other than that day on scene?
18
19
          Α
               No.
               Have you been able to answer all of my questions
20
          Q
21
     completely and accurately?
22
          Α
               Yes.
               MS. BLAQUIERE: All right. I appreciate it so
23
          much. Ms. DeLiberato may have follow-up questions.
24
25
               MS. DELIBERATO: No questions.
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MS. BLAQUIERE: And Ms. Constantine.
 1
 2
                                 I have no questions. Thank
               MS. CONSTANTINE:
 3
          you.
               MS. BLAQUIERE: That will be the end of the
 4
 5
          depo.
                (Deposition concludes at 11:39 a.m.)
 6
 7
 8
9
10
11
12
13
14
15
16
17
18
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21
22
23
24
25
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```
COUNTY OF PINELLAS
                             )
 1
 2
     STATE OF FLORIDA
 3
                         CERTIFICATE OF OATH
 4
               I, the undersigned authority, certify that
 5
     SANDRALEIGH COPELAND personally appeared before me and was
 6
     duly sworn.
 7
               witness my hand and official seal this 30TH day
 8
 9
     of JANUARY, 2025.
10
                                 Tamara M. Pacheco
11
12
                                Tamara M. Pacheco, RPR
                                COMMISSION # 474485
                                EXPIRES: March 30, 2028
13
14
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 SANDRALEIGH COPELAND; 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			

1		ERRATA SHEET	
2	IN THE CASE OF:	STATE OF FL V. JUAN MOLINA-SALLES	
3	NAME OF DEPONENT:	SANDRALEIGH COPELAND	
4	CASE NUMBER:	22-09348CFANO	
5			
6	Please read	d the transcript of your deposition.	
7	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.		
8	Sign and da	ate the transcript below.	
9	PAGE LINE ERROI	R/AMENDMENT REASON FOR CHANGE	
10			
11			
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19			
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21			
22		Signature	
23			
24		Date	
25			