

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: RHONDA KLEIN
TAKEN BY: Counsel for the Defendant
DATE: November 20, 2024
TIME: 11:04 a.m. - 11:12 a.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 RHONDA KLEIN

3 (the deponent herein, being first duly sworn, was examined
4 and testified as follows:)

5 EXAMINATION

6 BY MS. BLAQUIERE:

7 Q Please state your full name for the record.

8 A Rhonda Klein.

9 Q And where do you currently work, Ms. Klein?

10 A Pinellas County Sheriff's Office Forensic
11 Sciences Division.

12 Q And what's your title there?

13 A Assistant supervisor.

14 Q Any specialties over at the Forensic Sciences
15 Division?

16 A Like, as in, like, specialty teams?

17 Q No, like DNA, prints. I don't know whatever
18 else. Do you have any specialties?

19 A No.

20 Q What are your general duties as a forensic
21 specialist?

22 A As an assistant supervisor, I am in charge of
23 supervising six people on my shift, and I do admin duties,
24 reading reports, approving reports, and then if major
25 calls come in, we go out to the scenes with them.

1 Q Okay. How long have you been employed with the
2 Sheriff's department?

3 A With the Sheriff's department, I've been
4 employed 24 years.

5 Q How long have you been in the Forensics
6 Division?

7 A Since March of 2004.

8 Q Any work complaints sustained?

9 A No.

10 Q And before we get into the details, I have you
11 wrote two supplements, Supplement 5 and 76. Is that
12 correct?

13 A Supplement 5 and 75.

14 Q Supplement, sorry, 5 and 75.

15 A Yes.

16 Q Okay. Any others?

17 A No.

18 Q Can you tell me what drew you to the scene as
19 far as this case?

20 A So I was called in by Lieutenant Gross to come
21 assist Sanford in supervising the scene because it was a
22 large scene.

23 Q Okay. How big was the scene? How far north did
24 it extend?

25 A I'm not good at distance, but it was long.

1 Q Did it extend to the bridge basically?

2 A When they found him, yes, it went to the bridge,
3 but I wasn't -- I only extended from Hartwick, where he
4 was up to the front-end loader.

5 Q Okay. And then what did you do when you got on
6 scene?

7 A I was informed of the incident by Lieutenant
8 Gross, and then I was requested to assist Sanford if she
9 had any questions. And then I was pulled in multiple
10 directions by command staff of, go here, go here. I just
11 basically delivered instructions to people or told command
12 staff who was working which part of the scene.

13 Q Okay. I kind of gathered that. Did you also do
14 any ariel photography?

15 A I did. I was advised that Eagle would be
16 landing in a few seconds, and I was going up in it to take
17 ariel photography while everything was in play.

18 Q Was that during -- was that the next morning on
19 the 23rd?

20 A I -- yeah, because I arrived on scene on the
21 23rd at 0050 hours. So I went up in Eagle. I would have
22 chose to go at a different time. If you see my pictures,
23 they're a little dark because the sun wasn't really up yet
24 in the sky, but that's when command staff wanted to go.
25 So it was when the sun was rising. I don't remember what

1 time I exactly went up.

2 Q Okay. They did not have in custody Juan
3 Molina-Salles at that time yet, correct?

4 A I don't think so because I don't think the
5 bloodhounds were even there yet.

6 Q Was there another chopper out there that was
7 still looking for him, or did they -- were they able to
8 complete both tasks, look for Mr. Molina-Salles and let
9 you take photos at the same time?

10 A I don't know that answer. I just know I got in
11 a helicopter. I don't know if there was two up or not.
12 There was so much going on.

13 Q Was it -- did you go up a second time a day or
14 two later?

15 A Yes. I went up again on the 24th at the proper
16 timeframe when the sun is directly overhead in the sky,
17 and I took additional photographs.

18 Q Okay. Also, you -- did you do anything else
19 besides review other specialists' reports and tell them
20 what to do and where to go?

21 A No.

22 Q Okay.

23 A I mean, I took the handcuffs out of his pouch,
24 per command staff, to give them to the detective.

25 Q Deputy Hartwick's cuffs?

1 A Yeah. I was asked to remove them, so I was
2 tasked with doing that.

3 Q Did -- what goes in to you reviewing the other
4 forensic specialists' reports?

5 A So we sit down and we review their photographs,
6 their evidence collections, and read their report to make
7 sure all the wording makes sense and stuff.

8 Q And you make sure that's fully and accurately
9 reported?

10 A To the best of our knowledge. We don't know
11 exactly a hundred percent what they did. So we just make
12 sure everything is there that's required for our general
13 orders and stuff and SOPs.

14 Q Okay. Did you author anyone else's report for
15 them or help them with any reports?

16 A No.

17 Q Do you know -- did you know Deputy Hartwick
18 either professionally or off duty?

19 A I knew -- I have known him my whole career, yes.

20 Q Okay. How -- did you ever work with him before
21 you were in the Forensic Sciences Division?

22 A I did not. I met him here.

23 Q Okay.

24 A Well, I worked at property and evidence from
25 2000 to 2004, so that's where I met him but like with the

1 Sheriff's office.

2 Q I get it. Did he ever -- did you guys ever have
3 any off-duty relationship where you guys were friends or
4 ever met up or anything?

5 A No.

6 Q Okay. Can you tell me anything about him
7 regarding his hearing or eyesight?

8 A No.

9 Q Okay. Did he ever talk with you about the
10 Archer Western detail?

11 A No.

12 Q Did he ever express any emotional turmoil
13 shortly before his death? Anything about being depressed
14 or anything like that?

15 A No.

16 Q When was the last time you did talk to him?

17 A I don't even know.

18 Q Okay. That's fine. Did you -- did we miss
19 anything that you've done with regards to this case
20 besides what we've already talked about and what's in your
21 two supplements?

22 A No, ma'am.

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

25 A No, ma'am.

1 Q Have you been involved in any case briefings
2 with either the Sheriff's office or the State Attorney's
3 office after the evidence that you've got in your two
4 supplements?

5 A No.

6 Q Have you understood all of my questions so far?

7 A Yes.

8 Q Have you been able to answer them completely and
9 accurately?

10 A Yes.

11 MS. BLAQUIERE: All right. I don't have anymore
12 questions, Ms. Klein. I appreciate your time. I
13 don't know if Ms. DeLiberato has any.

14 MS. DELIBERATO: (Shakes head.)

15 MS. BLAQUIERE: She does not. Ms. Constantine
16 or Mr. Vonderheide for the state.

17 MS. CONSTANTINE: I have no questions. Thank
18 you.

19 MS. BLAQUIERE: Okay. would you like to read
20 your deposition before it's submitted or waive your
21 right to read it?

22 THE DEPONENT: Read.

23 (Deposition concludes at 11:12 a.m.)

24

25

1 COUNTY OF PINELLAS)

2 STATE OF FLORIDA)

3 CERTIFICATE OF OATH

4

5 I, the undersigned authority, certify that
6 RHONDA KLEIN personally appeared before me and was duly
7 sworn.

8 witness my hand and official seal this 30TH day
9 of JANUARY, 2025.

10

11

Tamara M. Pacheco

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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 RHONDA KLEIN; 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

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ERRATA SHEET

IN THE CASE OF: STATE OF FL v. JUAN MOLINA-SALLES
NAME OF DEPONENT: RHONDA KLEIN
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