

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:

HEATHER LEGG

TAKEN BY:

Counsel for the Defendant

DATE:

November 20, 2024

TIME:

10:52 a.m. - 11:01 a.m.

PLACE:

ZOOM Videoconference

REPORTED BY:

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

Pages 1 - 13

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

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EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 HEATHER LEGG

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

5 EXAMINATION

6 BY MS. BLAQUIERE:

7 Q Can you please tell me -- state your full name
8 for the record.

9 A Heather Marie Legg.

10 Q And Ms. Legg, where do you work?

11 A Currently I work for Target.

12 Q For who?

13 A Target.

14 Q Okay. When did you leave -- where were you
15 working back in September of 2022?

16 A The Pinellas County Sheriff's Office.

17 Q What was your role with them back in September
18 of 2022?

19 A I was a latent print examiner.

20 Q Okay. And what was your prior background and
21 work experience as a latent print examiner?

22 A I had worked for the Sheriff's office for
23 twelve-and-a-half years in the AFIS Division. So the
24 first seven years I had worked in the jail fingerprinting
25 all of the inmates and doing known-to-known comparisons

1 over there, and then five -- about five-and-a-half years,
2 I was a latent examiner before I left.

3 Q why did you leave?

4 A Just personal reasons.

5 Q Okay. And I ask nearly every law enforcement
6 officer, so my apologies. This is not particular to you,
7 but have you had any work complaints sustained when you
8 were working with the Sheriff's department?

9 A No.

10 Q And did you have any law enforcement experience
11 before Pinellas County?

12 A No.

13 Q I have in our discovery that you authored one
14 police report, Supplement 78. Do you have that available?

15 A I no longer work there anymore, so I don't have
16 access to any -- oh, hold on. Sorry, I had an alarm going
17 off. I don't have access to any of the records there
18 anymore at all.

19 Q Okay. So no one forwarded you your report in
20 preparation for today's deposition?

21 A No.

22 Q Okay. well, I have it pulled up if you need to
23 look at it for any refreshers. Just let me know.

24 A Okay.

25 Q This case is involving Juan Molina-Salles, who

1 Ms. DeLiberato and I represent, involving the death of
2 Deputy Michael Hartwick. Do you have any independent
3 memory of your involvement in that case?

4 A The only thing that I do recall from that case
5 without looking at the notes, I believe there were three
6 sets of known prints that were taken off three
7 individuals. I couldn't tell you who those people are
8 without looking at them. And I know they were run through
9 the AFIS database, and the comparisons were made on other
10 known prints. I don't believe there was actual evidence
11 that I did a comparison on.

12 Q Okay. I'm going to share -- I believe I'm
13 sharing the right report. Do you see my cursor at the
14 top?

15 A Yes.

16 Q Okay. Supplement 78 right here?

17 A Yes.

18 Q Okay. And then -- sorry. Scrolling up to the
19 first page, there's your name as the reporting.

20 A Yes.

21 Q So I -- who directed you to -- who instructed
22 you to do these prints?

23 A So the way cases work in our office, if it's a
24 major case, it goes off rotation at the time; so it would
25 have been I was just next on the list. So I receive all

1 of the evidence typically from the forensic specialists
2 that drop off the envelopes. Sometimes they dropped it
3 off to the building. Sometimes the supervisor went and
4 picked the envelopes up from forensics.

5 Q Okay. So it looks like you -- did you only
6 analyze the prints, or did you also lift them?

7 A I did not lift anything. So all I do is do an
8 analysis and determine if they're suitable for comparison.
9 I then conduct comparisons if they are, and if they're
10 suitable for comparison, I render conclusions based off
11 what my findings are.

12 Q Can you take a minute and look at this very
13 short second page of your report.

14 A Yes.

15 Q And then -- so that's all I have for you is that
16 first page with your name on it and then the subject
17 further down on the first page and then page two. Can you
18 tell me what else you did? I mean, can you identify the
19 people that you lifted prints -- that you looked at the
20 prints for?

21 A So the way that it works is whatever -- the
22 elimination prints bear the name of who the forensic
23 specialist put the name on there. So I have no idea how
24 they came up with those names. All I do is receive the
25 evidence.

1 I determined that Item 1 had three impressions
2 that I did comparisons on. I can't just off this report
3 alone tell you how I obtained the known fingerprint cards
4 for the people that were identified to. If I had to
5 speculate, it was probably through the AFIS database.

6 And so I then do a comparison where I start with
7 the known print that we have that was taken out in the
8 field. I then find corresponding areas in the known print
9 that would have hit in the database, and it came up with
10 the conclusion of identification for the subjects for each
11 item.

12 Q So we'll start with latent Item 1 for Cinthia
13 Gomez. So you compared prints that were taken off of
14 Ms. Gomez on scene to known prints?

15 A To known prints that beared the name Cinthia
16 Gomez as well. So it was an identification for Cinthia
17 Gomez to Cinthia Gomez essentially.

18 Q Okay. And the same for Allan Zelaya?

19 A Yes.

20 Q And Hernandez Valladaras?

21 A Yes.

22 Q What did you -- did you tell anyone about these?
23 What was the purpose of you obtaining these prints? Do
24 you know?

25 A I do not know. So that is typically something

1 that happens out in the field. It's either the
2 investigator that's directing the forensic officer to take
3 them or forensics is taking them for some reason. I don't
4 know how essentially or why we have those fingerprints.

5 Q Okay. Did you know Deputy Hartwick, the deputy
6 that died in this case either professionally or off duty?

7 A No.

8 Q Have you done any research about this case
9 regarding Juan Molina-Salles or my client,
10 Mr. Molina-Salles?

11 A No.

12 Q Have you been involved in any briefings with the
13 sheriff's department or the State Attorney's office about
14 this case --

15 A No.

16 Q -- aside from your report, Supplement 78?

17 A No, just that I received subpoenas for the trial
18 and received subpoenas for the zoom call. That was it.

19 Q Where are those prints stored, the ones that
20 were obtained from Ms. Gomez, Mr. Zelaya, and
21 Mr. Valladaras? The ones that were lifted from the scene.

22 A So all of that is kept in the latent unit down
23 off of 145th Avenue. So those are all retained in the
24 office until they're archived, and I'm not actually sure
25 where the archive building is located.

1 Q Okay. Any involvement in this case aside from
2 what's listed in your report, Supplement 78?

3 A No.

4 Q Have you understood all my questions?

5 A Yes.

6 Q Have you been able to answer them completely and
7 accurately?

8 A I'm sorry, what was the last part? It kind of
9 broke up.

10 Q Have you been able to answer them completely and
11 accurately?

12 A Yes.

13 MS. BLAQUIERE: Okay. And I don't know if
14 MS. DeLiberato has any questions. She's shaking her
15 head no. I don't know if the state attorneys do.

16 MS. CONSTANTINE: I have no questions.

17 MS. BLAQUIERE: Okay. Do you want to read or
18 waive your right to review the depo before it's
19 submitted?

20 THE DEPONENT: Read, please.

21 (Deposition concludes at 11:01 a.m.)
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 HEATHER LEGG 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

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 HEATHER LEGG; 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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PAGE	LINE	ERROR/AMENDMENT	REASON FOR CHANGE
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[illegible]

Date