

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:

CHRISTOPHER OLIVER

TAKEN BY:

Counsel for the Defendant

DATE:

November 21, 2024

TIME:

10:53 a.m. - 11:09 a.m.

PLACE:

ZOOM Videoconference

REPORTED BY:

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

Pages 1 - 18

JTP REPORTING (727)422-8287

## APPEARANCES

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## EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 CHRISTOPHER OLIVER

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

5 EXAMINATION

6 BY MS. BLAQUIERE:

7 Q Mr. Oliver, can you please state your full name  
8 for the record.

9 A Christopher Oliver.

10 Q Okay. Before we get started, myself, Nichole  
11 Blaquiere, along with Ms. Maria DeLiberato, we represent  
12 Mr. Juan Molina-Salles in this case, and Elizabeth  
13 Constantine with the State, she's also on the call.

14 A Okay.

15 Q Can you tell me where you work now?

16 A I still work for St. Pete Fire Rescue.

17 Q Okay. Great. How long have you been with  
18 St. Pete Fire Rescue?

19 A Eighteen years and two months.

20 Q How many years?

21 A Eighteen years and two months.

22 Q Great. Sorry. There's a lot of background  
23 noise. And what is your role with them? What's your job  
24 title?

25 A Firefighter-EMT.

1 Q what's your training for firefighter-EMT?

2 A well, I'm an emergency medical technician and  
3 also a firefighter. I have certifications in both. I  
4 have eighteen years of experience. We have continuous  
5 medical education and training for EMT and fire service  
6 community-based.

7 Q How often do you have to do the continuing  
8 medical education training?

9 A Every month.

10 Q Do you ever give -- do you yourself ever give  
11 trainings to other people for medical training, emergency  
12 medical training?

13 A I don't. I'm not an instructor.

14 Q Okay. Have you ever done that?

15 A No.

16 Q Okay. And do you have any prior relevant  
17 training before your time with St. Pete Fire Rescue?

18 A No, ma'am.

19 Q Can you tell me -- do you know Deputy Hartwick  
20 either professionally or off-duty?

21 A No.

22 Q And you -- did you write any reports in this  
23 case?

24 A I didn't. Not me.

25 Q I didn't see any reports from anyone on your

1 engine. You were on Engine 13, right?

2 A I was in Truck 13.

3 Q Sorry, Truck 13. I didn't see any reports from  
4 anyone who was on your truck that day. Is that accurate?

5 A That's accurate because we're a BLS truck, which  
6 means it's EMTs only. We didn't have any paramedics on  
7 our truck. That means we did not write any reports.

8 Q Okay. Have you been able to review any reports  
9 in preparation for your deposition today?

10 A No, ma'am.

11 Q Have you reviewed deputy -- I'm sorry, not  
12 deputy but I guess he's another fire rescue. Have you  
13 reviewed any reports in preparation for your deposition  
14 today by any chance?

15 A I'm sorry, I haven't read any reports concerning  
16 this incident.

17 Q Okay. So do you have an independent memory  
18 about this case?

19 A Yes, I do.

20 Q Okay. Go ahead and tell me what you remember  
21 from the very beginning of when your truck got called out.

22 A We responded to a vehicle accident. As we  
23 responded, the notes updated and said it was a vehicle  
24 versus pedestrian. It just said it was maybe a law  
25 enforcement personnel involved. So we had to -- we

1 responded to the call, and once we pulled up on scene, it  
2 was kind of dark, so we couldn't really see. We had put  
3 our scene lights on for the truck, and that's when we saw  
4 the deputy laying down on the side of the interstate in  
5 the work area, not -- he wasn't in the -- he was in the  
6 roadway, but it was the work area of the roadway.

7 We stopped the truck, turned the lights on. Our  
8 driver jumped out, grabbed the AED, and then we start  
9 working the deputy. We put the AED on. We were the first  
10 on scene. No one else was on scene. Just BLS lifesaving  
11 measures, we started doing CPR. We tried taking the vest  
12 off, started doing CPR.

13 Once we got the AED on him, it was evident that  
14 he had already passed away. He -- well, as we were doing  
15 CPR, you could hear crackling, you know, his bones, not --  
16 I guess by being hit by whatever he was hit by. Then  
17 after that, that's when the other deputies started to come  
18 on scene, the other emergency medical workers started  
19 coming on scene. But he was called -- we called him  
20 before anybody responded.

21 Q Okay. Your truck was the first truck on scene  
22 that day, correct?

23 A Correct. Yes, ma'am.

24 Q And you guys beat out all the other rescue  
25 personnel as well, correct?

1           A     That's correct.

2           Q     Any other first responders?

3           A     Other first responders arrived on scene, but it  
4 was after the fact. I don't recall -- I don't recall who  
5 got on scene first and what unit or who was on the unit,  
6 but yeah, Truck 13 was the first on scene.

7           Q     Okay. And when you got on scene, the interstate  
8 hadn't been shut down yet at all, correct?

9           A     Correct. Can you hear me?

10          Q     Yes. When you got to the scene -- when you  
11 first got to the scene, there hadn't been any activity yet  
12 on shutting the interstate down yet. Is that correct?

13          A     That is correct.

14          Q     Who was the first to go hands-on with Deputy  
15 Hartwick that night?

16          A     I'm sorry, can you say that again?

17          Q     Who was the first to go hands-on with Deputy  
18 Hartwick that night?

19          A     Is Deputy Hartwick, is that the guy that got ran  
20 over?

21          Q     Yes.

22          A     Truck 13 was. We were the first ones on scene.  
23 Now, there were other construction workers on scene, but  
24 they were not with the deputy. They were off -- I don't  
25 know the distance, but there were other construction



1 workers nearby, which in my opinion was kind of weird  
2 because -- I don't know if they knew the deputy was down,  
3 but in my opinion, I think they -- I don't know if they  
4 understand the situation, but they just were standing  
5 there. They didn't give any help.

6 Q So of your -- of the people on your truck, that  
7 was Lieutenant Deschryver, Benjamin Wendell, and yourself,  
8 right?

9 A Correct.

10 Q Of the three of you, who was the first person to  
11 go hands-on with the deputy who was down on the scene?

12 A Ben Wendell.

13 Q Okay. And what did he -- did he state anything  
14 immediately upon putting his hands on Deputy Hartwick?

15 A If he did, I wasn't really paying attention. It  
16 was kind of all hands on in the moment. What we did was  
17 started doing lifesaving measures. We started to remove  
18 his vest so we could do compressions because he was  
19 obviously not breathing. We checked for a rhythm. I  
20 didn't. I'm pretty sure Ben did compressions. He started  
21 doing compressions.

22 Q You broke up a little on the last sentence.

23 A I'm pretty sure Ben checked for a pulse, which  
24 he didn't find, which is the reason why he started doing  
25 compressions.

1 Q Okay. And you saw no signs of breathing?

2 A No.

3 Q Did you see any other signs that would be  
4 consistent with life? Anything at all?

5 A No.

6 Q Okay. And when you were touching him and  
7 feeling him, what was remarkable about his body, if  
8 anything?

9 A It was like, if you understand, like, crepitus.  
10 That means when you, like, touch someone, you -- like  
11 bones was moving. Nothing is in place where it was  
12 supposed to be, if you understand what I'm saying.

13 Q Nothing felt like it was supposed to?

14 A Yeah. Like a human structure, you know, when  
15 you feel -- when you touch a human, there's structure.  
16 There's bones. There's bones to protect your organs.  
17 When we started doing compressions with the officer, it  
18 was obvious that he didn't -- he was having -- he had some  
19 kind of -- how should I say this? Crepitus. I don't know  
20 if you know what that means. Like, his bones were like  
21 not stern.

22 Q Like they were broken?

23 A Yes.

24 Q Do you remember who called the Signal-7?

25 A It was Lieutenant Deschryver.

1           Q     How long after your arrival on scene did  
2     Lieutenant Deschryver call the Signal-7?

3           A     I would say maybe two or three minutes at the  
4     most. It wasn't very long.

5           Q     Was there any additional deformities to his body  
6     or even the left side of his body?

7           A     Not that I noticed. It was -- like I said, he  
8     was a law enforcement first responder. It was a pretty  
9     bad scene. I didn't really look over the body. Once the  
10    lieutenant called Signal-7, we just got a sheet and put it  
11    over him.

12          Q     Okay. What did you do after the Signal-7 was  
13    called?

14          A     Like I said, we just try to keep the area clear.  
15    We found a cover to cover him up, and we just waited for  
16    all the emergency responders to arrive on scene. Mostly  
17    it was sheriffs. The sheriffs start to arrive on scene,  
18    and they started to shut down the scene and made sure to  
19    preserve the crime scene. I myself, I didn't do much. I  
20    didn't do anything other than help cover the body up.

21          Q     I think also in the EMS report notes -- and this  
22    may be redundant from what we've already talked about, but  
23    the EMS report notes indicate that Deputy Hartwick was,  
24    quote, obviously dead, end quote. Was that the case that  
25    you and your fellow Truck 13 coworkers -- is that what you

1 came upon when you initially arrived on scene, that Deputy  
2 Hartwick was obviously dead?

3 A When we came up on scene, he was obviously down.  
4 I wouldn't say obviously dead. He was laying down on the  
5 ground. We didn't know what he was until we actually got  
6 on scene and start working on him, you know, start putting  
7 our hands on, touching him, checking for a pulse, that  
8 type of thing. But, you know, if you're saying just from  
9 the truck, he was obviously down in the road if that  
10 helps.

11 Q Okay. Were you the one that put the AED device  
12 on Deputy Hartwick?

13 A Yes. I was -- we all pretty much. It was all  
14 hands on. So, yeah, I was one of them. Like I said, we  
15 got his vest separated from his body so we can start to  
16 put the pads on. We had to remove his vest before we did  
17 that.

18 Q Were you able to utilize the AED device?

19 A No. I mean, we didn't -- I don't know if we  
20 actually turned it on, but as we were doing compressions  
21 and before we even got to the AED, it was obvious that he  
22 was not viable.

23 Q Say that one more time.

24 A It was obvious once we start touching him and  
25 doing CPR and checking for a pulse and checking for him

1 breathing, it was obvious that he had succumbed to his  
2 injuries.

3 Q And had passed away?

4 A Yes.

5 Q Do you remember speaking to other -- being  
6 interviewed by other deputies on scene that morning?

7 A Yeah. I got interviewed by the guy -- the  
8 deputy that was interviewing, you know, the people that  
9 were on scene, but only just -- I only got interviewed or  
10 talked to by one deputy. I don't know his name, but it  
11 was one of those guys that I talked to.

12 Q Okay. What do you remember about that  
13 interview?

14 A Just -- he just basically asked me what we saw,  
15 what we did, and that was it.

16 Q Okay. Were you able to understand all of his  
17 questions?

18 A Yes.

19 Q Were you able to answer them completely and  
20 accurately?

21 A Yes.

22 Q Okay. Have you understood all of my questions  
23 so far?

24 A Yes, I have.

25 Q Great. Have you been able to answer them

1 completely and accurately?

2 A Yes.

3 Q Okay. Is there anything else about this case  
4 that you recall that we haven't already discussed?

5 A No.

6 Q And have you done any research into my client or  
7 this case aside from once you left the scene that morning?

8 A I haven't done any research on anything  
9 concerning this case. There's no research that needs to  
10 be done. I'm wanting to tell you -- only to tell the  
11 story that I was a part of. No other documents. No one  
12 else came to me and said I need to study up on this case.  
13 Nothing like that happened. I'm just telling you what I  
14 remember and what happened to the best of my ability.

15 MS. BLAQUIERE: Great. That's all we can ask.  
16 Thank you so much, Mr. Oliver. I don't know if my  
17 co-counsel, Ms. DeLiberato has any follow-up  
18 questions.

19 EXAMINATION

20 BY MS. DELIBERATO:

21 Q Just really brief for the record. The word you  
22 said crepitus, is that C-R-E-P-I-T-U-S? Is that the word  
23 you're saying?

24 A Yes.

25 Q Okay. And that's like the crunchy sort of sound

1 of bone?

2 A Yes. Correct.

3 MS. DELIBERATO: Perfect. I just wanted to make  
4 sure. I thought that's what you meant, and I wanted  
5 to make sure it was clear for the record. That's all  
6 I have. Thank you so much.

7 MS. BLAQUIERE: I don't think Ms. Constantine  
8 has any questions.

9 MS. CONSTANTINE: No questions. Thank you.

10 MS. BLAQUIERE: Thank you so much, Mr. Oliver,  
11 for your time this morning.

12 THE DEPONENT: Thank you.

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14 (Deposition concludes at 11:09 a.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  
6 CHRISTOPHER OLIVER personally appeared before me and was  
7 duly sworn.

8 witness my hand and official seal this 4th day  
9 of February, 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 CHRISTOPHER OLIVER; 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: CHRISTOPHER OLIVER

CASE NUMBER: 22-09348CFANO

PAGE	LINE	ERROR/AMENDMENT	REASON FOR CHANGE
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Date