

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:

FALANZO TOWNES

TAKEN BY:

Counsel for the Defendant

DATE:

November 21, 2024

TIME:

2:51 p.m. - 2:55 p.m.

PLACE:

ZOOM Videoconference

REPORTED BY:

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

Pages 1 - 12

ZOOM VIDEOCONFERENCE APPEARANCES

NATHAN VONDERHEIDE, ESQUIRE

Assistant State Attorney

14250 49th Street North

Clearwater, Florida 34620

Attorney for the State of Florida

MARIA DELIBERATO, ESQUIRE

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Assistant Public Defenders

14250 49th Street North

Clearwater, Florida 34620

Attorneys for the Defendant

## INDEX

FALANZO TOWNES	PAGE:
Examination by Ms. DeLiberato.....	4
Certificate of Oath.....	10
Certificate of Reporter.....	11
Errata/Signature Page.....	12

## EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 FALANZO TOWNES

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

5 EXAMINATION

6 BY MS. DELIBERATO:

7 Q Good afternoon. Can you please state and spell  
8 your name for the record.

9 A My name is Falanzo Townes. It's spelled  
10 F-A-L-A-N-Z-O. Last name is T-O-W-N-E-S.

11 Q And how are you employed?

12 A Employed -- I'm a deputy with the Pinellas  
13 County Sheriff's Office.

14 Q My name is Maria DeLiberato. I'm an assistant  
15 public defender. Myself and Nichole Blaquiere represent  
16 Juan Molina-Salles. We're here for your deposition.  
17 Present for the State is Nathan Vonderheide.

18 Pinellas County Sheriff's case number 22-305232.  
19 I don't have that you authored any supplement. You're  
20 noted as a back-up in a Daniel Mattox supplement, but I  
21 don't think you authored any. Is that correct?

22 A Technically, I wrote the report. I was in FTO  
23 under Mattox.

24 Q Okay. So that report was actually written by  
25 you but signed off by him?

1 A Yes, ma'am.

2 Q Okay. Can you talk me through your law  
3 enforcement background. When were you first hired by  
4 PCSO?

5 A I was hired January of 2022.

6 Q Okay. You've been there since?

7 A Yes.

8 Q Any prior law enforcement experience?

9 A No.

10 Q Any complaints sustained against you for any  
11 reason since January of '22?

12 A No.

13 Q And I think you said you were a field training  
14 officer at the time?

15 A Yes. I was in FTO.

16 Q And who were you with?

17 A Deputy Mattox.

18 Q Okay. So you're the trainer, and he's the  
19 trainee?

20 A Oh, no. He's a trainer. I was the trainee.

21 Q Got it. I said that backwards. That's what I  
22 was trying to figure out. So how was it that you got  
23 involved in this particular case?

24 A We were there initially conducting traffic  
25 control on the exit of I-275. At some point they arrested

1 the defendant, and we were the closest person to transport  
2 him. So they picked us, and we just took him to the SAB.

3 Q Okay. When you were directing traffic, did you  
4 ever actually make it to the scene where Deputy Hartwick  
5 was in the accident?

6 A No.

7 Q Did you know Deputy Hartwick personally or  
8 professionally?

9 A No.

10 Q Had you ever spoken to him before?

11 A No.

12 Q Do you know when you were call out, as far  
13 as like when you came on shift if you were doing --

14 (Outside interruption.)

15 MS. DELIBERATO: Nathan, you're not on mute.

16 MR. VONDERHEIDE: Thank you.

17 Q (By Ms. Deliberato) Sorry. So do you know when  
18 you first got called to the scene? Was it right after the  
19 accident, or was it the next morning?

20 A The next morning.

21 Q You came on shift in the morning and went  
22 straight there?

23 A Yes.

24 Q What do you remember about Juan Molina-Salles?  
25 Anything about his demeanor?

1           A     Not much. I know he kind of dozed off when he  
2 was in the waiting room but that's it. Nothing that I can  
3 recall.

4           Q     Anything about his physical appearance?

5           A     I know he's a heavier-set male.

6           Q     Were his clothes wet or anything like that?

7           A     I do not recall.

8           Q     Do you speak Spanish?

9           A     No.

10          Q     Do you remember him saying anything?

11          A     No.

12          Q     Were you driving, or was Mattox driving?

13          A     I was driving.

14          Q     And Mattox was in the front seat?

15          A     Yes.

16          Q     And he was in the backseat?

17          A     Yes.

18          Q     Do you have like an in-car camera?

19          A     Yes.

20          Q     And it would have been turned on?

21          A     Yes.

22          Q     And were you also wearing a body-worn camera?

23          A     Yes.

24          Q     And the report notes, it says "I," so I don't  
25 know if this was you or Mattox. "I had no interaction

1 with Juan other than making a small handcuff adjustment."  
2 was that you that made the adjustment or Mattox?

3 A I believe it might have been Mattox, but I do  
4 not know for sure.

5 Q Okay. Nothing else that you recall about your  
6 interaction with Mr. Molina-Salles?

7 A No.

8 Q Do you know how long you would have spent with  
9 him?

10 A We were there for a few hours.

11 Q Okay. Did you watch the interrogation?

12 A No.

13 Q When they started talking to him, did you then  
14 leave or --

15 A There was a -- they were in the interview room.  
16 They just closed the door. We were outside in the  
17 hallway.

18 Q And it's my understanding it kind of can be  
19 broadcast on the closed-circuit monitors throughout the  
20 station. Did you watch them at all?

21 A I don't have any knowledge how that works to be  
22 honest.

23 Q Okay. Did you do anything else as it relates to  
24 this case?

25 A No.



1 Q And I think you said this was the only report  
2 that you authored, and then it was signed off by Mattox?

3 A Yes.

4 Q Did you do any research into the case on your  
5 own about my client, about his background or the charges?

6 A No.

7 Q Have you followed the case as it's wound its way  
8 through the court system or anything like that?

9 A No.

10 Q Did you attend any meetings, briefings with the  
11 State Attorney's office or with your department about the  
12 case?

13 A No.

14 MS. DELIBERATO: I don't have any further  
15 questions. Thank you so much for coming.

16 MR. VONDERHEIDE: No questions. Thank you.

17 (Deposition concludes at 2:55 p.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 FALANZO TOWNES 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 FALANZO TOWNES; 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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# ERRATA SHEET

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

NAME OF DEPONENT: FALANZO TOWNES

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
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Signature

Date