

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:

JEFFREY RICHARZ

TAKEN BY:

Counsel for the Defendant

DATE:

November 21, 2024

TIME:

9:20 a.m. - 9:28 a.m.

PLACE:

ZOOM Videoconference

REPORTED BY:

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

Pages 1 - 13

JTP REPORTING (727)422-8287

## 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 Defender

14250 49th Street North

Clearwater, Florida 34620

Attorney for the Defendant

## INDEX

JEFFREY RICHARZ	PAGE:
Examination by Ms. Blaquiere.....	4
Certificate of Oath.....	11
Certificate of Reporter.....	12
Errata/Signature Page.....	13

## EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 JEFFREY RICHARZ

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

5 EXAMINATION

6 BY MS. BLAQUIERE:

7 Q Good morning, Mr. Richarz. Myself, Nichole  
8 Blaquiere, along with Ms. Maria DeLiberato have the  
9 privilege of representing Mr. Juan Molina-Salles in this  
10 case, and thank you for coming for your deposition.

11 Can you go ahead and state your full name and  
12 where you work.

13 A Yes. Jeffrey J. Richarz. I work for Pinellas  
14 County Sheriff's Office in the Forensic Science Section.

15 Q And how long have you done that?

16 A Twenty-three years.

17 Q And is that all with the Sheriff's department?

18 A Yes, ma'am.

19 Q Okay. Any -- what's your educational background  
20 for that?

21 A I have a two-year degree in crime scene  
22 technology and then also my on-the-job training and  
23 experience.

24 Q Okay. Any work complaints sustained ever?

25 A No.

1 Q Okay. Before we get to the details of this  
2 case, I think I have that you wrote one supplement,  
3 supplement 10. Is that correct?

4 A Yes, ma'am.

5 Q Okay. Also, before I ask you further about  
6 that, did you know Deputy Hartwick professionally or  
7 personally?

8 A Yes, I did.

9 Q How long did you know him?

10 A Just in passing. I had had calls with him  
11 before.

12 Q Okay. Did he ever talk about his time working  
13 the traffic detail for Archer Western?

14 A No.

15 Q Okay. Did you know him to need eyeglasses or  
16 hearing aids?

17 A No.

18 Q So, basically, your only relationship was  
19 work-related where he would drop off and discuss evidence  
20 on scene, something like that?

21 A Yes.

22 Q Have you been able to review your supplement in  
23 preparation for your deposition today?

24 A Yes.

25 Q And did you review anything else in preparation

1 for your deposition?

2 A No.

3 Q Okay. Go ahead. Do you have an independent  
4 memory of this case as well, aside from what you wrote in  
5 your supplement?

6 A Yes.

7 Q Okay. Great. Could you go ahead and tell me  
8 what called you to the scene that night and what you did?

9 A I was called to the scene to bring some extra  
10 lighting to the scene, and then while I was there, I was  
11 assigned to begin a 3D scan of the scene.

12 Q Where was the extra lighting placed around the  
13 scene?

14 A I don't recall.

15 Q Do you remember where you dropped off the extra  
16 lighting?

17 A It was -- it was there at the scene.

18 Q Okay. In the north areas near Ulmerton or right  
19 near where Deputy Hartwick's vehicle was or the makeshift  
20 Sheriff's office mobile unit?

21 A I don't remember exactly where I --

22 Q It was a pretty big scene?

23 A Yes, ma'am.

24 Q Okay. And why were the extra lighting -- why  
25 was the extra lighting needed?

1 A It was dark.

2 Q Okay. Was it needed for the FARO scanning  
3 particularly?

4 A No, just for extra lighting in general.

5 Q Okay. And then I think you said you did some  
6 FARO scanning as well?

7 A Yes, ma'am.

8 Q Can you tell me about that process, please.

9 A Used our 3D scanner to begin scanning the area  
10 of the scene. And what that can do is, by doing multiple  
11 scans of the area, those could be linked together to  
12 conform or to make a 3D model of the scene.

13 Q Okay. And which areas were you scanning?

14 A It was the roadway and exit ramp area off of 275  
15 where the scene occurred.

16 Q Okay. Were other people also assisting with the  
17 FARO scanning?

18 A I was relieved by Supervisor Camacho.

19 Q Did she also do FARO screening?

20 A Scanning, yes, ma'am.

21 Q Scanning. Sorry. And where did she take -- how  
22 many FARO scanners were out there?

23 A I believe just the one.

24 Q Okay. How many does the Sheriff's office have?

25 A I know we -- the Forensics department has two,

1 and I believe the Traffic Homicide Division also has one  
2 or two.

3 Q Okay. And that you saw that night, how many --  
4 you only saw one FARO machine out there that night?

5 A I was -- the one that I was using, yes.

6 Q What did you do after Ms. Camacho relieved you  
7 from your responsibilities with that portion?

8 A That was the end of my -- end of my need or --  
9 not need but involvement with this case at that time.

10 Q Okay. Were you working the day-shift the day  
11 prior?

12 A Yes. I worked the evening shift from 3 to 11.

13 Q 3 a.m. to eleven a.m.?

14 A 3 p.m. to 11 p.m.

15 Q Okay. So you were out way past your shift  
16 normally would run its course?

17 A Yes, ma'am.

18 Q Do you remember when you got to the scene?

19 A I don't have the exact time I got to the scene,  
20 but when I started, the scanning was approximately 2:40 in  
21 the morning.

22 Q Okay. Was Deputy Hartwick's body still at the  
23 scene when you started your scanning?

24 A I believe he was.

25 Q Okay. And then do you remember about when you

1 were relieved to go home?

2 A When I was relieved by Supervisor Camacho? I  
3 don't have that exact time.

4 Q And were you done with your shift when  
5 Supervisor Camacho relieved you?

6 A Yes. After going back to the office, yes.

7 Q Okay. What did you do when you got back to the  
8 office?

9 A I secured my gear and went home for the evening.

10 Q Great. Not a trick question. I just don't know  
11 all the things you did. You're doing perfectly.

12 Did you see any of the lay witnesses or talk to  
13 any of them that evening?

14 A No.

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

17 A No.

18 Q Okay. Anything else about your involvement that  
19 we have not discussed?

20 A No, ma'am.

21 Q And have you understood all my questions?

22 A Yes.

23 Q Great. Have you been able to answer them  
24 accurately and completely?

25 A Yes.

1 MS. BLAQUIERE: Okay. I don't know if my  
2 co-counsel, Ms. DeLiberato has any questions.

3 MS. DELIBERATO: (Shakes head.)

4 MS. BLAQUIERE: She's saying no.  
5 Ms. Constantine with the State -- who might be in  
6 court -- I'm sure would jump up and say something if  
7 she had a burning question for you. I think we'll  
8 end our deposition, and thank you so much for coming  
9 today.

10 (Deposition concludes at 9:28 a.m.)  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
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 JEFFREY RICHAZ personally appeared before me and was duly  
7 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  
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 JEFFREY RICHARZ; 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  
17  
18  
19  
20  
21  
22  
23  
24  
25

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

NAME OF DEPONENT: JEFFREY RICHARZ

CASE NUMBER: 22-09348CFANO

PAGE	LINE	ERROR/AMENDMENT	REASON FOR CHANGE
------	------	-----------------	-------------------

[illegible]

Date