

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:

MAKEDA SIMMONDS

TAKEN BY:

Counsel for the Defendant

DATE:

November 21, 2024

TIME:

11:39 a.m. - 11:48 a.m.

PLACE:

ZOOM Videoconference

REPORTED BY:

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

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ZOOM VIDEOCONFERENCE 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 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 MAKEDA SIMMONDS

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

5 EXAMINATION

6 BY MS. BLAQUIERE:

7 Q Okay. Please state your full name for the
8 record.

9 A Makeda Simmonds.

10 Q Okay. And where do you work?

11 A Pinellas County sheriff's office.

12 Q And how long have you worked for the Sheriff's
13 department?

14 A Two years and two months.

15 Q Okay. Not long at all. Was this one of your
16 first -- very first calls with them?

17 A Yes.

18 Q Okay. Do you have any prior law enforcement
19 experience before your time with the Sheriff's department?

20 A Yes. I started in the Virgin Islands as a crime
21 scene investigator for seven years. I went to Clearwater
22 Police Department for crime scene for five years before
23 coming to the Pinellas County Sheriff's Office.

24 Q Okay. And I have here that you wrote one
25 supplement, and that's Supplement 6. Is that correct?

1 A I'm not sure what number it is, but yes, I wrote
2 one supplement.

3 Q Okay. Have you had a chance to review it before
4 your deposition today?

5 A Yes.

6 Q Okay. Have you reviewed anything else in
7 preparation of your deposition today either --

8 A My photographs.

9 Q Okay. Did you in your short time with the
10 Sheriff's department, did you know Deputy Hartwick either
11 professionally or personally?

12 A No.

13 Q Can you go ahead and tell me what -- also, do
14 you have an independent memory of that day aside from
15 what's in your report?

16 A Can you repeat that?

17 Q Do you have an independent memory of that day?
18 Aside from just being able to look at your report, do you
19 remember the scene? I imagine it was a big event compared
20 to other potential crime scenes that you've been to since.

21 A Just what's in my report.

22 Q Okay. Great. Well, let's get started with tell
23 me what you remember from the beginning of when you were
24 called out to the scene.

25 A I was called out to the offramp of 275 in a

1 pond-ish area where a wallet was located.

2 Q Okay. Is that when you were first -- very first
3 time called to the scene? When do you remember responding
4 to the interstate scene area?

5 A I can't remember, but I can look in my report.
6 off the top of my head, I can't remember.

7 Q Yes, please.

8 A Give me one second.

9 Q Okay.

10 A It was about 11 a.m.

11 Q Maybe a good question to add is what shift were
12 you working that day?

13 A I was working with my field training officer at
14 that time, so it was the morning shift. I believe we
15 started -- I don't remember what time we started. Was it
16 six or seven? I know it was a morning shift. I can't
17 remember what our start time was.

18 Q Was it still dark out when you guys got to the
19 scene that morning?

20 A No.

21 Q Okay. And where was -- where did you go when
22 you first arrived to the interstate scene?

23 A We went to the area of the offramp.

24 Q Okay. Did you ever make it down to the mobile
25 sheriff's unit?

1 A No.

2 Q Okay. Did you ever make it down to where the
3 front-loaders were?

4 A No.

5 Q Okay. Go ahead. And once you arrive to the
6 offramp, what do you do?

7 A We are directed to an area of grass where the
8 wallet was found.

9 Q Okay. What was relayed to you about the wallet?

10 A That a wallet was found that possibly belonged
11 to the suspect.

12 Q Okay. Had there been any other Sheriff's
13 deputies handling the wallet, or was it still just in the
14 grass where they found it?

15 A When I got on scene, it was still in the grass.

16 Q And what did you guys -- was that Specialist
17 Fuentes? Was that your supervisor?

18 A That was my field training officer, yes.

19 Q Which of you collected the wallet?

20 A I did.

21 Q And what did you do with it after?

22 A Photographed it here in the lab and then
23 submitted it to our property and evidence.

24 Q Okay. Did you do anything else after being
25 called to collect the wallet?

1 A I was with my field training officer when she
2 went to process the suspect.

3 Q Okay. Can you -- is that what you did after the
4 wallet or before?

5 A The wallet was already completed at that time.

6 Q Okay. So once you processed the wallet, then
7 you and Ms. Fuentes go to the Sheriff's Administration
8 Building. Is that right?

9 A Yes.

10 Q Can you tell me about that?

11 A We went there, and she processed the suspect.

12 Q Where is "there"?

13 A To the administrative building.

14 Q Like in a detention cell? In an interview room?

15 A It was an interview room.

16 Q Okay. And do you remember what you and
17 Ms. Fuentes processed him for?

18 A No. You would have to ask her.

19 Q Okay. How did you assist her, if at all?

20 A I was just there.

21 Q Did you take any photographs or anything like
22 that?

23 A No, ma'am.

24 Q And then about how long was it that you were
25 with him when he was being processed?

1 A I was outside of the room. I don't know how
2 long it was.

3 Q Okay. That you could see or were told by
4 Ms. Fuentes, was he cooperative?

5 A It appeared so.

6 Q Okay. Did you see her process him at all?

7 A I saw her when she was taking photographs, yes.

8 Q Okay. I just -- like, was there a window that
9 you could see into the --

10 A The door was open. The doorway was open.

11 Q Okay.

12 A The door to the interview room was open.

13 Q Okay. So you could see her doing her job
14 with --

15 A Yes.

16 Q Got it. What did you and Ms. Fuentes do after
17 that?

18 A I believe we came back to our lab.

19 Q Anything else about this case?

20 A No, ma'am. No.

21 Q When you arrived on scene to process the wallet,
22 was the Sheriff's department set-up still on the
23 interstate?

24 A I believe it was, but I couldn't see it from
25 where the offramp was.

1 Q Okay. What could you see?

2 A A pond and bush.

3 Q Okay. Sounds good. Did you have any
4 conversation with Mr. Molina-Salles?

5 A No.

6 Q Can you recall what his demeanor was like when
7 Ms. Fuentes and you were in the Sheriff's Administration
8 Building?

9 A As far as I recall, I don't remember him saying
10 anything. I really can't remember.

11 Q Okay. Was he quiet and cooperative?

12 A As far as I remember, yes. Like I said, he
13 wasn't saying anything.

14 Q Have you done any research about this case
15 further or our client, Mr. Juan Molina-Salles?

16 A No.

17 Q Pardon?

18 A No.

19 Q Okay. Sorry, I didn't hear you. I apologize.

20 A It's fine.

21 Q Have you been involved in any case briefings
22 either for the Sheriff's office or at the State Attorney's
23 office after your involvement with Ms. Fuentes?

24 A No.

25 Q Have you understood all my questions so far?

1 A Yes.

2 Q Great. Have you been able to answer them
3 completely and accurately?

4 A Yes.

5 MS. BLAQUIERE: I don't have anymore questions.
6 I don't know if my co-counsel, Ms. DeLiberato has
7 any.

8 MS. DELIBERATO: (Shakes head.)

9 MS. BLAQUIERE: She's shaking her head no. And
10 if Ms. Constantine --

11 MS. CONSTANTINE: I have no questions.

12 MS. BLAQUIERE: Thank you so much for your time,
13 Ms. Simmonds. You're all done.

14 (Deposition concludes at 11:48 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 MAKEDA SIMMONDS 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
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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 MAKEDA SIMMONDS; 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: MAKEDA SIMMONDS

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