

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:

SEAN TIPTON

TAKEN BY:

Counsel for the Defendant

DATE:

November 21, 2024

TIME:

2:31 p.m. - 2:40 p.m.

PLACE:

ZOOM Videoconference

REPORTED BY:

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

Pages 1 - 14

JTP REPORTING (727)422-8287

ZOOM VIDEOCONFERENCE APPEARANCES

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Attorney for the State of Florida

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EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 SEAN TIPTON

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. Could you please state and
8 spell your last name for the record.

9 A Yes. Sean Paul Tipton. It's S-E-A-N, P-A-U-L,
10 T-I-P-T-O-N.

11 Q And how are you employed?

12 A I work with Pinellas County Public Works.

13 Q And what do you do for them?

14 A I am -- well, currently I'm their debris
15 manager. I'm managing all of the debris cleanup. But my
16 normal day-to-day would be right-of-way permitting
17 coordinator.

18 Q Say that again, right-of-way what?

19 A Right-of-way permitting coordinator.

20 Q Okay. How long have you been employed with the
21 county?

22 A Nineteen, almost twenty years.

23 Q Okay. My name is Maria DeLiberato. I'm an
24 assistant public defender. Myself and Nichole Blaquiere
25 represent Juan Molina-Salles who is charged in this case.

1 Nathan Vonderheide is here for the State.

2 we're here for your deposition. Did you review
3 anything before your deposition today?

4 A No, ma'am.

5 Q Do you have any --

6 A Just the subpoena.

7 Q Okay. You were listed as a witness by the
8 State. I think you had some pretty minimal involvement,
9 but do you remember the incident with the Deputy Hartwick
10 being killed in an accident on 275 back in 2022?

11 A I do, ma'am.

12 Q Okay. And how was it that you actually became
13 involved in this case?

14 A We have a vehicle storage building at our Public
15 Works complex, and the Sheriff's department reached out to
16 us to see if they could store the loader that struck
17 Deputy Hartwick while they were conducting their
18 investigation so it stayed indoors and out of the weather
19 elements.

20 Q Okay. And was that like -- did they contact you
21 to do that? Did they contact --

22 A No. They reached out directly to I believe my
23 director, Kelly Levee, and then the request got forwarded
24 over to meet them in the yard and get the loader put away
25 and secured.

1 Q Do you know when that was?

2 A Yeah. It was -- I've got my notes. I did write
3 some notes just on some dates. It was the day of the
4 21st, the day of the incident later in the afternoon.

5 Q Okay. So the accident happened --

6 A I'm sorry, the 22nd. I apologize. I'm looking
7 at today's date. I've got a log of everything that I'm
8 doing day-to-day right now. So, no, it was actually
9 October 22nd of 2022 that it arrived at our Public Works
10 facility.

11 Q We're going to try again because I think the
12 accident happened September 22nd, and then it was probably
13 into the next day, the 23rd.

14 A Okay.

15 Q But I don't know when it got to you. It's
16 possible it got to you a month later. So what do you --

17 A No. No. It would have been -- I'm just reading
18 off of my notes, just what I'm recollection [sic]. It
19 arrived the same day that the incident happened. For some
20 reason my mind thought it was that date. I apologize.

21 Q That's okay. And how -- when was it that you
22 first knew that the front-loader was there?

23 A I got the call. I went down. I knew that it
24 was in route to our yard, which is located at 22211 US
25 Highway 19. We went and stood outside the vehicle storage

1 building, waited until one deputy showed up in a cruiser.
2 we showed him where we were going to put it. He said
3 okay. Then shortly thereafter, a tractor-trailer lowboy,
4 like an equipment trailer pulled into the yard with
5 another deputy cruiser following it.

6 Q And then it was like unloaded into your
7 facility?

8 A Correct. They unloaded it. The gentleman that
9 was operating and driving a lowboy backed it into the
10 facility. The detectives put those little security strips
11 on the door, and then we put blue -- like blue and green
12 colored tarps just to kind of cover it. And then we put
13 cones and kind of these expandable poles around it so our
14 staff would not go over there and mess with it thinking it
15 was a county loader or anything, and an e-mail was sent
16 out to all staff.

17 Q Does that building remain locked?

18 A It is -- it's open to county employees through a
19 scan. So they have to wave their employee badge and they
20 can get access in there. A lot of the crews will keep
21 their vehicles and equipment in there. It's about ten
22 different bays, big roll-up doors that they back into
23 nightly just to keep their vehicles out of the weather
24 elements as well.

25 Q Okay. Did you have any other involvement in

1 helping to secure the front-loader or go back to it at any
2 other time.

3 A The only involvement I did was help the deputies
4 with stretching the tarp over it. I climbed up on a tire
5 on one side, and another deputy was on the other side. We
6 stretched it over and kind of Bungee Cord it down to keep
7 it in place. I did periodically put my head into the VSB
8 to make sure the tarps were still in place how we left it,
9 but other than that, no other involvement.

10 Q The VSB, is that the vehicle storage bay?

11 A Yes, ma'am. That's the vehicle storage. I'm
12 sorry.

13 Q That's okay. At some point I know the
14 front-loader was kind of released back out of your
15 custody. Do you -- were you present for that?

16 A No. That I was not present for. My
17 understanding is Jared -- his last name Rouillard -- he is
18 our head fleet mechanic. The deputies -- it was on a
19 Friday when -- we work a lot of Monday through Thursday.
20 Friday is a skeleton staff and they're out in the field
21 already, but fleet is there. Jared opened the vehicle
22 storage building for the deputies on February 10th, 2023.

23 Q Okay.

24 A And they -- it was right around noon. I had --
25 I have another gentleman that has access to our cameras

1 way back when. Knowing that this trial was going to come
2 up and I was not part of release, which I wanted to be
3 because I originally I guess kind of took chain of
4 custody, for lack of words, but he went back and verified
5 on our security cameras. At 12:11 is when the building
6 was opened up, and then at 12:21, it was loaded and the
7 lowboy took the loader back out of the yard.

8 Q Okay. Did you talk to anybody, talk to the
9 Sheriff's office, give an interview or anything like that
10 about any of your involvement?

11 A No, ma'am.

12 Q Have you followed this case at all in the news,
13 about anything that my client was arrested for or charged
14 with? Anything like that?

15 A Yes, briefly. It of course made the news. I do
16 work hand-in-hand routinely with the Sheriff's department
17 for other things, road closures for accidents, fatality
18 accidents, right now with the debris for helping out with
19 traffic control. So I do work with them on a weekly,
20 biweekly basis. So I do have some mutual -- not friends
21 but mutual colleagues that we will talk, and I would get
22 some -- not particular updates. Just, hey, did they find
23 the guy? It's like, Yeah, they found them. Stuff like
24 that. Very minimal. Really what I would see in the news,
25 Facebook posts, stuff like that. I did watch the

1 Sheriff's Facebook post update that he provided as well.

2 Q Have you continued to follow the case sort of as
3 it winds its way through the court system?

4 A No, ma'am. I figured you guys were still
5 pulling all the data together to take it to trial. I
6 didn't even know if it's in trial or not.

7 Q Okay. And did you -- you said you had some kind
8 of mutual colleagues, friendships, relationships with some
9 of the deputies. Did you actually ever know Deputy
10 Hartwick, Michael Hartwick?

11 A No, ma'am. No. My neighbor down the street, he
12 was partnered with him over in Safety Harbor when he was
13 assigned to that unit. So just us talking -- he's got a
14 young kid the same age as my son, so they play. Just
15 knowing that I had that minimal involvement, we just
16 talked. Kind of mutual buddies if he wanted to vent and
17 kind of talked, just to be a shoulder for him to -- you
18 know, somebody for him to listen.

19 Q Sure. Who's your neighbor?

20 A Sean Cappiello, Deputy Cappiello.

21 Q Okay. Have you talked to him recently about it?

22 A No. Huh-uh.

23 MS. DELIBERATO: Okay. I don't have any further
24 questions. I apologize for being a little late
25 today.

1 THE DEPONENT: No worries. Not a problem.

2 MR. VONDERHEIDE: No questions. Thank you.

3 MS. DELIBERATO: Thanks so much.

4 THE DEPONENT: Thank you for your time.

5 (Deposition concludes at 2:40 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 SEAN
6 TIPTON personally appeared before me and was duly sworn.

7 witness my hand and official seal this 4th day
8 of February, 2025.

9
10 *Tamara M. Pacheco*

11 Tamara M. Pacheco, RPR
12 COMMISSION # 474485
13 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 SEAN TIPTON; that a review of the transcript
8 was requested; and that the transcript is a true and
9 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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ERRATA SHEET

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

NAME OF DEPONENT: SEAN TIPTON

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