

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.

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DEPOSITION OF: STEVIE THOMAS  
TAKEN BY: Counsel for the Defendant  
DATE: November 21, 2024  
TIME: 2:03 p.m. - 2:13 p.m.  
PLACE: ZOOM Videoconference  
REPORTED BY: Tamara M. Pacheco, RPR  
Notary Public, State of FL

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ZOOM VIDEOCONFERENCE APPEARANCES

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## EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 STEVIE THOMAS

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

5 EXAMINATION

6 BY MS. DELIBERATO:

7 Q Are you driving while you're doing this?

8 A Yeah. I don't have -- pretty much it's going to  
9 be real quick.

10 Q Okay. Please just don't look at me while you're  
11 driving. You can even turn your camera off if you want.  
12 We're not here to have another accident. Please be  
13 careful.

14 Can you state your name for the record.

15 A Stevie Thomas.

16 Q And how are you employed?

17 A Sergeant with the Pinellas County Sheriff's  
18 office.

19 Q How long have you been there?

20 A Nearly 25 years.

21 Q And what are your duties?

22 A I'm a sergeant over school resource officers.

23 Q And how long have you been employed in that  
24 role?

25 A As a sergeant, approximately three years.

1           Q     My name is Maria DeLiberato. I'm sorry I didn't  
2 introduce myself. I represent Juan Molina-Salles with my  
3 cocounsel, Nichole Blaquiere. Present for the State is  
4 Nathan Vonderheide.

5                     We're here for your deposition. This is into  
6 the incident where Deputy Hartwick passed in the  
7 construction accident. It's case number 22-305232. I  
8 don't have that you authored any supplements. My  
9 understanding is you were part of the off-duty detail. Is  
10 that right?

11           A     Correct.

12           Q     Had you worked that off-duty detail before that  
13 night?

14           A     Yes.

15           Q     How many times?

16           A     I can't give you an exact number, but I worked  
17 it quite a few times.

18           Q     Have you worked it since the accident?

19           A     Yes.

20           Q     Did you know Deputy Hartwick professionally or  
21 personally?

22           A     No.

23           Q     Do you remember ever having any conversations  
24 with him or anything like that?

25           A     No, ma'am.

1 Q Did you see him that night at the staging area  
2 before you all got placed?

3 A I'll have to say no because there usually will  
4 be quite a few vehicles there, and we'll usually just stay  
5 in our vehicles until they come and get us.

6 Q Okay. And who was the Archer Western employee  
7 who was telling you guys where to go in placing you?

8 A Unfortunately, I wasn't on that scene. I was --  
9 I remained on the traffic post blocking off the road at  
10 the location that they originally had me designated. So I  
11 wasn't there when they were directing the other deputies  
12 where to look at it and where to go.

13 Q So do you know who Kody Gardner is?

14 A No.

15 Q Okay. So tell me what -- you got -- tell me how  
16 you knew where to go that night. Who told you where to  
17 go?

18 A Well, we report to a staging area, and one of  
19 the Archer workers will come and get us and take us to the  
20 location where they want us to remain for the night and  
21 during that period of the off-duty detail. So usually it  
22 can be any one of the employees depending on who shows up.

23 Q Okay. You don't remember who it was that night?

24 A No, I don't.

25 Q Okay. Where were you supposed to go? Where

1 physically were you?

2 A If I remember, I think they had me stay east at  
3 the location around 118th Avenue and the interstate, which  
4 is in between 28th Street and 34th Street on 118th area.

5 Q And were you given any specific instructions on  
6 what to do?

7 A They usually have us block off a specific area  
8 of the road, but I can't remember exactly what mine was  
9 that day. I do remember blocking off a portion of the  
10 interstate to prevent vehicles from traveling.

11 Q Did they give you any instructions about, like,  
12 what -- safety instructions about what to do with your  
13 lights or stay inside the car or anything like that?

14 A well, both of us remain in the car, and we turn  
15 our lights on. That's pretty much the extent of the  
16 detail. They specifically ask us to either follow one of  
17 the vehicles which is putting out cones or picking up  
18 cones, but most times, once we get to that designated  
19 area, we pretty much just remain in our vehicle with our  
20 emergency lights operational.

21 Q what was it this evening when you noted that  
22 anything sort of out of the ordinary had happened?

23 A when there is -- when they started calling for  
24 him on the radio. In that period, I wasn't aware what  
25 exactly happened. I just know they were calling for him

1 on the radio, and there was no response.

2 Q And what did you next learn?

3 A They eventually sent a patrol deputy out to the  
4 location. If I'm correct, they received a call from a  
5 citizen, and one of the deputies responded to the area. I  
6 think that's when they discovered Deputy Hartwick at the  
7 location.

8 Q And do you remember hearing anything on the  
9 radio traffic about, like, how quickly that they found him  
10 and how quickly he was pronounced deceased?

11 A I don't recall anything specific because a lot  
12 of stuff was going on. Once the deputy got there, I do  
13 remember hearing him on the radio saying that he was  
14 initiating CPR or something to that effect and called for  
15 additional units as well.

16 Q Did you ever make it back down towards the scene  
17 of the accident?

18 A No, ma'am, I did not.

19 Q Did you -- were you assigned any additional  
20 tasks? Like, I assume construction detail ended at that  
21 point, right, when the accident happens? Is that right?

22 A No. They still had -- because of that, they  
23 still had some of us maintaining our location, because the  
24 locations that we were designated prevented traffic from  
25 traveling onto the interstate. If I recall, I remember



1 having one of those locations, which was around 118th  
2 Avenue.

3 Q Yeah. I asked the question poorly. I assume  
4 that you stayed in your car closing down traffic, but it  
5 was no longer for construction work. It was for the  
6 accident scene preservation, correct?

7 A Correct.

8 Q And then how long did you stay at your traffic  
9 command post there?

10 A If I'm correct, probably stayed until about six  
11 or so or seven in the morning almost.

12 Q And then did you go off duty and go home?

13 A Yes.

14 Q Did you ever see my client, Juan Molina-Salles  
15 after he was taken into custody?

16 A No, ma'am.

17 Q Did you ever interview any witnesses or collect  
18 any evidence?

19 A No, ma'am.

20 Q Did you attend any meetings or briefings in your  
21 department or with the State Attorney's office about this  
22 case?

23 A No, ma'am.

24 Q Was there anything different when you worked the  
25 construction detail after Deputy Hartwick's accident? Did

1 Archer Western give you any additional safety  
2 instructions, safety briefings, anything like that?

3 A Not really. We pretty much done the same thing.  
4 But I know we now use the type of vehicle -- there's a  
5 vehicle that has the big bumper thing on the back of them  
6 now. Other than that, we pretty much do the same thing  
7 and just stay off the main portion of the interstate.

8 Q When you say they use a different vehicle, the  
9 Sheriff's deputies are using a different cruiser?

10 A Archer uses different type vehicles. I'm not  
11 exactly sure what you call the vehicles, but it had like a  
12 big bumper thing on the back of it for safety purposes.

13 Q Okay. But you don't recall getting any  
14 additional instructions for your own personal safety from  
15 Archer Western?

16 A No, ma'am.

17 Q What about from the Sheriff's office? Any  
18 additional instructions or policies from the Sheriff's  
19 office for those of you working off-duty?

20 A No, not really. Pretty much the same as it had  
21 been. Report to the designated location until a position  
22 to where we're going to be at. We would have emergency  
23 lights and stuff on. It's still pretty much the same.

24 Q Okay. Did you do any research into this case or  
25 my client or what he's charged with or anything like that?

1           A     No, ma'am.

2           Q     Did you follow this case on the news or as its  
3 wound its way through the court system?

4           A     No, ma'am.

5           MS. DELIBERATO: I don't have any further  
6 questions for you. Thank you so much for your time  
7 and for not getting into a car accident while we were  
8 doing this deposition. I don't believe the State has  
9 any questions.

10          MR. VONDERHEIDE: No questions. Thank you.

11          THE DEPONENT: Thank you all.

12                (Deposition concludes at 2:13 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 STEVIE THOMAS 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 STEVIE THOMAS; 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: STEVIE THOMAS

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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[illegible]

Signature

Date