

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:

TYLER REIDY

TAKEN BY:

Counsel for the Defendant

DATE:

November 21, 2024

TIME:

9:06 a.m. - 9:17 a.m.

PLACE:

ZOOM Videoconference

REPORTED BY:

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

Pages 1 - 15

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

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EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 TYLER REIDY

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. Please state your full name for
8 the record.

9 A Good morning. It's Corporal Tyler Reidy -- the
10 last name is spelled R-E-I-D-Y -- with the Pinellas County
11 Sheriff's Office.

12 Q Thank you, Corporal Reidy. I have here before
13 we get started that you authored one report, Supplement 9.

14 A I did author one supplement. I can't tell you
15 the number though.

16 Q Have you been able to review it in preparation
17 of your deposition today?

18 A I did.

19 Q Okay. Did you review anything else in
20 preparation of your deposition today?

21 A Just the CAD notes only specifically to the
22 timestamps of my response.

23 Q Okay. So tell us where you work.

24 A I work for the Pinellas County Sheriff's Office.

25 Q And can you go over your law enforcement

1 background and experience, please.

2 A Sure. Prior to working for the Sheriff's
3 office, I worked for a small town up in New Hampshire as a
4 police officer. Since being here, during that time, I was
5 a member of the Major Accident Investigation Team, as well
6 as a field training officer, and serving as a member of
7 the Negotiator Response Team.

8 Q Up in New Hampshire?

9 A No, down here.

10 Q Oh, down here. Okay. Can you tell me the
11 lengths of time, please, as well.

12 A Sure. About two-and-a-half years in New
13 Hampshire, and I've been at the Sheriff's office since
14 2018.

15 Q Great. And I've been asking all law
16 enforcement, so please don't be offended. Have you had
17 any work complaints sustained?

18 A No.

19 Q Okay. Do you also have an independent memory of
20 the work -- of your response in this case?

21 A Vaguely so, yes.

22 Q Okay. Can you go ahead and tell me what your
23 roles and duties were that day?

24 A So that day I was working shifts, so midnight
25 shift which would have been 6 p.m. to 6 a.m. During that

1 time I had a recruit. We were working, again, a regular
2 patrol shift before the call came out and responded to the
3 scene as part of my MAIT capacity.

4 Q Okay. And about when did you get to the scene?

5 A The timestamp shows -- and again, I can't say if
6 this was to pick up the truck for MAIT or if it was once
7 on scene proper. It was about 11:34 p.m.

8 Q Okay. Which truck was that that you picked up?

9 A So the MAIT truck for the Major Accident
10 Investigation Team basically just carries specialized
11 equipment. It has a light tower, as well as cones that we
12 use for the MAIT team and for crash call-outs.

13 Q Okay. And then what did you do once you got
14 that vehicle on scene?

15 A Once on scene, I coordinated with some of the
16 supervisors on scene to determine what needed to be shut
17 down, where we could best utilize what the truck carried,
18 both cones and the size of the vehicle just as a sheer
19 roadblock, and also the fact that it had a light tower,
20 just where that could be best placed to light the scene.

21 Q Where was traffic shut down from for this case?

22 A I entered from Exit 30 going northbound in the
23 southbound lanes as the traffic was already shut down
24 north of the scene at that point.

25 Q Was traffic still able to go across the bridge

1 when the interstate was shut down?

2 A which bridge are you referring to?

3 Q I'm sorry, Howard Frankland.

4 A I do believe so. I got with Florida Highway
5 Patrol to continue to coordinate their traffic diversion,
6 but I don't believe the bridge would have been shut down
7 at that point, no.

8 Q And then what did you do after you helped set up
9 the mobile unit?

10 A I checked on my supervision to make sure that
11 they were personally okay with it, and then it became
12 coordinating with the MAIT supervision to determine what
13 our role was going to be to not interfere with the Crimes
14 Against Persons Unit's functions while we were there.

15 Q Okay. And did you do any evidence collection,
16 take photographs, talk to witnesses? Anything like that?

17 A No, I did not speak to any witnesses. I didn't
18 collect any evidence, and I did not take any photos.

19 Q Back to one of the items you said on the MAIT
20 truck, it had a big light tower you said?

21 A Correct.

22 Q And why was that utilized?

23 A Because at that time it was nighttime. So in
24 order for the deputies, detectives, CSI to all see better
25 and to not have to use flashlights as, you know -- to not

1 use flashlights all the time, we were able to use the
2 light tower to give better scene lighting.

3 Q Okay. And did you do anything else that day
4 that would be worthy of testifying at trial? Any other
5 involvement before I get to a couple other questions?

6 A I really had no direct interaction with any of
7 the evidence on scene and/or people that would have been
8 involved in this case, both witnesses or any defendants or
9 anything in the case.

10 Q Do you remember when you left the scene that
11 day?

12 A I left around 10 a.m.

13 Q Okay. Did you see our client, Juan
14 Molina-Salles get taken into custody?

15 A I was working when I heard the radio traffic,
16 but I can't speak to the fact whether I saw him at all
17 because I was staying on the highway. So I don't know
18 where he was in relation to the highway.

19 Q Okay. So you never saw him that morning?

20 A Not to the best of my recollection, no.

21 Q Did you ever work any of the Archer Western
22 traffic detail?

23 A I did.

24 Q And did you work it before Deputy Hartwick's
25 passing?

1 A Yes.

2 Q Did you work any at all after Deputy Hartwick's
3 passing?

4 A Yes.

5 Q Did you remember whether -- did you work
6 directly with Kody Gardner?

7 A Yes. He was the -- I believe they called him
8 the MOT coordinator. He was basically who placed deputies
9 for their assignments.

10 Q Did he go over safety instructions with you
11 before every traffic detail shift for the Gateway
12 Expressway project?

13 A Not explicit safety instructions for each, but
14 there was kind of a standing explanation of the roles and
15 responsibilities once on scene.

16 Q Okay. Can you tell me what those were, please.

17 A Basically his placement was his explanation of
18 this road or this lane is going to be shut down. I want
19 you here with your emergency lights activated.

20 Q Did he ever give you any additional safety
21 guidance, like it's our policy that we want anyone out of
22 their vehicle to wear their safety vest?

23 A No. He never discussed any Archer Western
24 policy specifically.

25 Q And after Deputy Hartwick's passing, did Archer

1 western or Kody, did they try and renew the importance of
2 wearing your traffic safety vest?

3 A I can't speak to the fact whether they have or
4 not, but obviously with the Sheriff's office members --

5 Q Yeah. I didn't know if they ever -- if you
6 worked the duty again afterwards if they themselves talked
7 to you about the importance of. I apologize.

8 A No, that's okay. Like I was explaining, I don't
9 know if they specifically did for us, but I know that us
10 as members, you know, wanted to make sure that we
11 continued our traffic safety in wearing our vests.

12 Q And you were saying about the -- I didn't mean
13 to cut you off but I did. It's a bad habit. Sorry. You
14 were saying the Sheriff's office, did they reiterate some
15 safety policies after Deputy Hartwick's death?

16 A I can't recall if they did directly or not.
17 Again, it was more so just taken under each member to make
18 sure we were doing so, but I can't speak whether they had
19 specifically provided any guidelines or instructions.

20 Q Okay. Did you know Deputy Hartwick
21 professionally or off-duty?

22 A I knew him professionally.

23 Q How long?

24 A Vague acquaintance for a few years prior. He
25 was the opposite side of the shift, so I didn't have any

1 or much direct interaction aside from when I worked
2 overtime or he worked overtime or any special functions
3 that we may overlap on.

4 Q Okay. Do you remember about when was the last
5 time you did talk to him?

6 A I couldn't even begin to guess at that point,
7 but it certainly wasn't, you know, a frequent interaction.

8 Q Okay. And did either of you ever talk to each
9 other about the Archer western detail?

10 A No.

11 Q Did he ever express any safety concerns about
12 the Archer western detail?

13 A No.

14 Q Anything else about your involvement that we
15 have not discussed?

16 A The only thing that is -- I mean, if you want to
17 call it my involvement, I had a deputy recruit, as listed
18 in the report at the time. Due to the nature of the
19 incident, I had him stay in a cruiser the entire time, so
20 he never approached the scene. That was basically the
21 only other part of the case or interaction that I had.

22 Q And what was that deputy recruit's name, please?

23 A Ryan Mears. He's no longer with the agency.

24 Q Okay. Were you a part of any Sheriff's office
25 or State Attorney's office agency meetings about the case

1 after Mr. Molina-Salles was arrested?

2 A No.

3 Q Have you understood all of my questions so far?

4 A Yes, I have.

5 Q Great. Have you been able to answer them
6 completely and accurately?

7 A To the best of my ability, yes.

8 MS. BLAQUIERE: I don't know if Ms. DeLiberato
9 has anymore questions.

10 MS. DELIBERATO: (Shakes head.)

11 MS. BLAQUIERE: She does not. I don't have
12 anymore questions. Thank you for coming today. I
13 don't know if Ms. Constantine with the State has any.

14 MS. CONSTANTINE: No questions. Thank you.

15 (Deposition concludes at 9:17 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 TYLER
6 REIDY 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 TYLER REIDY; 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. Pacheco16 Tamara M. Pacheco, RPR
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IN THE CASE OF: STATE OF FL v. JUAN MOLINA-SALLES

NAME OF DEPONENT: TYLER REIDY

CASE NUMBER: 22-09348CFANO

PAGE	LINE	ERROR/AMENDMENT	REASON FOR CHANGE
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Date