

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:

LAURA CAUDILL

TAKEN BY:

Counsel for the Defendant

DATE:

March 26, 2024

TIME:

2:56 p.m. - 3:50 p.m.

PLACE:

ZOOM videoconference

REPORTED BY:

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

Pages 1 - 53

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## EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 LAURA CAUDILL

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 name.

9 A Laura Caudill, L-A-U-R-A, C-A-U-D-I-L-L.

10 Q And, Ms. Caudill, have you ever given a  
11 deposition before?

12 A Yes.

13 Q In connection with this case?

14 A Yes, ma'am.

15 Q Okay. And I'll ask you about that later, but  
16 any other depositions that you've given other than  
17 previous about this case?

18 A No, ma'am.

19 Q So a couple of ground rules. If you'll answer  
20 yes or no to my questions. No head nods or uh-huh or  
21 huh-uh because the court reporter is taking down  
22 everything we say. Okay?

23 A Okay.

24 Q And if I ask you a question and you don't  
25 understand my question, please ask me to repeat it or to

1 clarify or anything like that. If you don't know  
2 something, that's okay. If you tell me -- if it's a  
3 guess, just tell me you're guessing. And if you don't  
4 know, that's perfectly okay to say that you don't know.

5 A Okay.

6 Q Do you have anything there with you that you've  
7 looked at or that you're reviewing or anything like that  
8 for the deposition today?

9 A Just the subpoena.

10 Q Okay. Any statements that you wrote down or  
11 that you gave or anything like that that you have in front  
12 of you?

13 A No, ma'am.

14 Q Did you review anything prior to this  
15 deposition?

16 A No, ma'am.

17 Q When was the deposition you gave previously?

18 A It was a few months ago. It was in Tampa a  
19 couple of months ago.

20 Q And was that in connection with the civil case  
21 in this matter?

22 A I believe so, yes.

23 Q Did you ever get a transcript of that deposition  
24 or have a chance to read it or anything like that?

25 A No, ma'am.

1 Q Was that on video or just typed in, like --

2 A Video.

3 Q Video. Okay. And you said that took place in  
4 Tampa. Was it at a law office?

5 A Yes. It was like off of Dale Mabry.

6 Q Okay. And I didn't introduce myself. I'm  
7 sorry. My name is Maria DeLiberato. I'm an assistant  
8 public defender, and I represent Juan Molina-Salles. And  
9 my co-counsel, Nichole Blaquiere is also here representing  
10 Juan. Nathan Vonderheide and Elizabeth Constantine are  
11 the prosecutors on this case. So they're two of the  
12 prosecutors who are prosecuting the case against Juan.

13 Was anyone from the State Attorney's office  
14 present at your civil deposition, if you know?

15 A I'm not sure.

16 Q Okay. Either of the two folks names that you  
17 see today, do they ring any bells or recall their faces or  
18 anything as having met with them before?

19 A No, ma'am.

20 Q Okay. And you said you think that was a couple  
21 of months ago, the depo?

22 A Yes.

23 Q Okay. So tell me -- I'm going to ask you kind  
24 of a bunch of geographical questions, some personal  
25 questions, and questions about this incident. Nothing

1 that I ask you is meant to embarrass you. Some of the  
2 questions I just have to ask. Where do you live? I don't  
3 need your exact address, but where -- in Pinellas County?  
4 Hillsborough County? Where do you live?

5 A Pinellas Park.

6 Q And how long have you lived in Pinellas Park?

7 A Like three years, four maybe.

8 Q And are you from Florida originally?

9 A Yes, ma'am.

10 Q Okay. Where did you grow up?

11 A Live Oak, Suwannee County.

12 Q When did you leave Suwannee County and come to  
13 Pinellas?

14 A Three to four years ago. I was here before, but  
15 then I went back, and then I came back.

16 Q Okay. Have you lived in any other counties  
17 other Suwannee and Pinellas?

18 A Hillsborough.

19 Q Hillsborough. Okay.

20 A Yes, ma'am.

21 Q Again, not meant to embarrass you. Have you  
22 ever been convicted of a felony or a crime of dishonesty,  
23 a misdemeanor?

24 A No, ma'am. Never been in trouble. No.

25 Q Have you ever been even arrested or anything

1 like that?

2 A No, ma'am.

3 Q How old are you?

4 A Forty-two.

5 Q And where are you employed?

6 A Archer Western deMoya.

7 Q How long have you been employed with them?

8 A with this one here -- with this project four  
9 years and then a year in Jacksonville, so five years.

10 Q So prior to -- when you say this project, the  
11 275 project?

12 A In Jacksonville, Florida.

13 Q Okay. No, but when you said four years on this  
14 project, did you mean the --

15 A This one -- because Archer Western, I worked  
16 Archer Western in Jacksonville, and this is Archer Western  
17 deMoya. I transferred over here.

18 Q Okay. So you worked for Archer Western in  
19 Jacksonville for a year?

20 A Uh-huh. Yes, ma'am.

21 Q And then you said over here. When you say  
22 "here," you mean in Pinellas County?

23 A Clearwater. Yes, ma'am, the Gateway Express.

24 Q Got it. That's on 275, the Howard Frankland,  
25 the project that you were working on the night this



1 incident happened?

2 A Not the Howard Frankland project. That's a  
3 different one from the Gateway Express.

4 Q Okay.

5 A But it's the 275, the express lanes. Yes,  
6 ma'am.

7 Q Got it. And how far did you go in school?

8 A To the eleventh grade.

9 Q And where did you go to school?

10 A Suwannee County.

11 Q Did you get your GED or anything?

12 A No, ma'am.

13 Q Prior to working for Archer Western, what kind  
14 of work did you do?

15 A I was caregiver for my mother, and then I worked  
16 at a nursing home for a while.

17 Q Any other jobs in, like, construction prior to  
18 Archer Western?

19 A No, ma'am.

20 Q And how was it that you got the job at Archer  
21 Western? That was in Jacksonville?

22 A Yes, ma'am. I put in an application.

23 Q And what was the job for?

24 A For a roller operator.

25 Q What does that mean?

1           A     To operate a roller. It flattens out the dirt.

2           Q     And do you need any kind of special training or  
3     licensing for that?

4           A     I got -- I'm FDOT certified. I got like  
5     500-hour, like, training.

6           Q     Okay. Did you have to do that before you got  
7     the job, or you have that and that's why you applied for  
8     the job?

9           A     I got it when I got the job. They started  
10    training me.

11          Q     Okay. And what project in Jacksonville were you  
12    working?

13          A     Oh, man. It's the 27 -- the interchange. I  
14    don't remember exactly. I'm sorry.

15          Q     And so you were the roller operator. Did you  
16    have any other jobs for Archer Western in Jacksonville?

17          A     I was a loader operator.

18          Q     Okay. And that's like the front loader, the  
19    front loader vehicle?

20          A     Yes, ma'am.

21          Q     And does that require a specific certification  
22    to drive?

23          A     No, but I got mine through a program.

24          Q     Does it require a specific certification though?

25          A     I'm not sure, but I got mine through a program

1 through the company.

2 Q Okay. And like I don't -- this is a new area  
3 for me. So like they say you're going to drive this front  
4 loader. Do they make you take the certification first  
5 before you drive it? Or do you sort of start driving it,  
6 and then you're taking the certification?

7 A Well, if you don't operate -- if you can't  
8 operate it, then, no, you don't get on it. I mean, they  
9 make sure you can operate it. Yes, ma'am.

10 Q Okay.

11 A I'm not sure about that. I did mine through --  
12 I came in and I did -- I did mine through a training  
13 through FDOT.

14 Q And my question I guess is, did you start  
15 driving the front loader before or after you finished that  
16 training or during?

17 A During I guess you could say. During.

18 Q Okay. So you started driving the front loader,  
19 and then at some point you got the certification to drive  
20 it?

21 A Yes.

22 Q Got it.

23 A Yes. You have to have so many hours of seat  
24 time. That's all it is.

25 Q Okay. Is there any kind of proficiency testing

1 or something that you have to do before they let you drive  
2 it in the first place?

3 A No, ma'am. Not that I'm aware of.

4 Q Okay. So how was it that you came to work at  
5 Archer Western deMoya over in Pinellas County or  
6 Pinellas/Hillsborough County?

7 A I just put in a request to get transferred over  
8 here because, like I said, I was here before. I stayed  
9 here with my sister, and I liked it over here.

10 Q Who do you live with in Pinellas Park?

11 A My two children and my two foster children.

12 Q How old are your kids?

13 A My children or the ones at home?

14 Q All of them.

15 A My oldest is 27. Then I have a 24-year-old, a  
16 22-year-old, a 20-year-old, 18-year-old. Then I adopted a  
17 12-year-old. I adopted a 10-year-old. Then I have an  
18 eight-year-old foster and a seven-year-old foster.

19 Q Full house for you.

20 A Well, my kids don't live with me. They're  
21 grown. It's just the four babies.

22 Q Just the twelve and under that live with you  
23 now?

24 A Yes, ma'am.

25 Q Okay. And are you their sole provider,

1 financial provider?

2 A Yes, ma'am.

3 Q So what was the transfer that you put in to come  
4 over to Archer Western?

5 A I don't understand what you mean.

6 Q You said you put in a transfer. Was it for a  
7 specific --

8 A I talked to -- no. I talked to my  
9 superintendent over there, and he asked, you know, to come  
10 over here.

11 Q And was it a specific position that you applied  
12 for?

13 A I came over here as a loader operator.

14 Q Okay. And when was that? You said about four  
15 years ago?

16 A Yes, ma'am.

17 Q Is that 2020?

18 A Yeah. I would say 2020, yes. Like September  
19 maybe.

20 Q Okay. So kind of just sort of still in the  
21 pandemic but kind of past that summer. Does that sound  
22 right?

23 A Yes, ma'am.

24 Q Okay. And what did you -- what was your job  
25 when you first came over? You said loader operator. Were

1 you driving a vehicle?

2 A The loader?

3 Q Yes.

4 A Yes, sometimes. Sometimes no. You don't always  
5 operate. Sometimes you're on the ground with a shovel.

6 Q Okay. Did your position or role at Archer  
7 Western change after 2020? How long did you -- were you  
8 the operator?

9 A Like, I did all kinds of stuff. So in  
10 construction, you don't do one specific job.

11 Q Okay. What kind of jobs did you have. Tell me  
12 all the ones you remember.

13 A You grade for wall footers, pump water. Not  
14 everything -- it doesn't involve you staying on a loader  
15 all the time. You have to do shovel work, and then again,  
16 I would still roll on a roller.

17 Q And when you come in to work like on a  
18 particular day, does somebody assign you a job for that  
19 day?

20 A Yes.

21 Q Okay. And who's that person?

22 A Jake Thomas, my superintendent.

23 Q And were you responsible for assigning other  
24 people work or no?

25 A No, ma'am.

1 Q okay.

2 A well, my crew, but we all are assigned to one  
3 job.

4 Q So that's my question. I want you to sort of  
5 walk me through and explain. We can talk about -- I want  
6 to -- let me ask my questions clearly. So you're on a  
7 crew with how many people?

8 A Right now I have three on my crew.

9 Q Okay. So let's walk through closer -- I want to  
10 be closer in time to this timeframe so we can narrow it  
11 down a little bit.

12 A Uh-huh.

13 Q When did you first work with or meet my client,  
14 Juan Molina-Salles?

15 A When he got placed on our crew.

16 Q When was that?

17 A I worked with him probably for like three months  
18 maybe.

19 Q So that would have been summer of 2022?

20 A Yes. Yes, ma'am.

21 Q Okay. Who placed him on your crew?

22 A The foreman at the time, Pedro. He wanted him  
23 on our crew.

24 Q How long had you worked with Pedro?

25 A Me? From the day I got here in Pinellas Park to

1 the Clearwater job, we were on a crew together.

2 Q Okay. And so your boss, Jake Thomas, when you  
3 first got here, he was someone who would tell you and your  
4 crew where to go each day. Is that right?

5 A Yes, ma'am.

6 Q Was Jake Thomas still your superintendent at the  
7 time of this incident?

8 A Yes, ma'am.

9 Q Okay. So you first met Juan. Did you know him  
10 as Juan, or did you know him as a different person?

11 A Victor. Well, I called him Panda.

12 Q Okay. How did he get that name?

13 A Do you know Kung Fu Panda? Po. He was -- he  
14 jumped around and stuff when we were working in the holes  
15 and stuff, so I just started calling him Panda.

16 Q You're the one that gave him that nickname?

17 A Yes, ma'am.

18 Q And you speak Spanish?

19 A Yes, ma'am.

20 Q How did you -- when did you learn Spanish?

21 A My ex-husband is Hispanic, so from family.

22 Q And are you fluent?

23 A (Nods head.) Pretty much, yeah.

24 Q How long have you been speaking Spanish?

25 A Since I was, like, 18.



1 Q Can you explain to me sort of the difference  
2 between -- so Jake Thomas, the superintendent, and Pedro,  
3 the foreman, like how does that work? Is Jake responsible  
4 for many foreman, and then -- what's the hierarchy? Does  
5 that make sense?

6 A Yes. He's the higher of us. So then there's  
7 the -- he's in charge of so many groups and the foreman,  
8 and then the foreman is in charge of the workers.

9 Q Okay. Did you work for any other foreman during  
10 the four years that you were at Archer from that moment  
11 when you transferred over to today other than Pedro?

12 A Yes. Me and Pedro both was on a crew with  
13 Albert Hurst before Pedro made foreman.

14 Q Okay. Anybody else other than Pedro or Albert?

15 A No.

16 Q So Pedro made foreman, and then you were on his  
17 crew?

18 A I got -- yes, I went with him.

19 Q Okay. So that was after Albert?

20 A Yes, ma'am.

21 Q And are you still on Pedro's crew today?

22 A No.

23 Q Who's your foreman now?

24 A I'm my foreman.

25 Q Okay. When did you become the foreman?

1           A     In -- around the time of the accident, we were  
2 actually changing from Pedro being more foreman to me. He  
3 was going to kind of get demoted.

4           Q     He was going to get promoted or demoted?

5           A     Kind of demoted. He was going to be the lead  
6 man.

7           Q     Okay. And how did that come about?

8           A     He didn't want to -- I guess didn't listen.

9           Q     Okay. So he was kind of getting in trouble as  
10 the foreman?

11          A     Yeah. He wanted to do what he wanted, not what  
12 he was told to do.

13          Q     Was there like tension between you and him that  
14 you were going to get his job?

15          A     Well, he acted like he didn't like the idea of  
16 me. You know? But me and him kind of like -- I kind of  
17 was doing mine, and he was still kind of -- he would do  
18 his. He had a project he was working on and then I had  
19 mine.

20          Q     So were you officially the foreman at the time  
21 of this accident?

22          A     Pedro was still.

23          Q     Okay. And did you become the foreman formally  
24 after this?

25          A     Yes, ma'am.

1 Q And is Pedro still with Archer Western or no?

2 A No, ma'am.

3 Q Do you know why? Did he get let go?

4 A I haven't seen him since the night of the  
5 accident.

6 Q Okay. And so I want to talk about kind of when  
7 you first met Juan, who you knew as Victor.

8 A Yes, ma'am.

9 Q Who all was on your crew at that point? So  
10 Pedro is the foreman?

11 A Uh-huh. There was me.

12 Q And then is there like a title? Are you the  
13 lead, or are there other --

14 A I was the lead, but on the -- I think in the  
15 paperwork at the time, it still had me as the loader  
16 operator, but I was lead man.

17 Q Okay. So Pedro is the foreman and then you?

18 A Uh-huh. And then we had Jose, Pedro's daughter  
19 Nicole, and his brother Glidden and George.

20 Q Okay. Nicole is Jose's daughter?

21 A No, that's Pedro's daughter.

22 Q Pedro's daughter. All right. And how old is  
23 Nicole? Do you know?

24 A You'd have to -- no, I never asked her how old  
25 she was.

1 Q Okay. I didn't know if you knew. That's all.

2 A No. I mean, you have to be 18, so I would  
3 assume over 18.

4 Q Was that the -- so this crew, when did Juan come  
5 on board? Like, did this crew get formed with Juan, or  
6 were you guys already together and Juan came on?

7 A No. He was working here in pipe crew. He came  
8 on with someone else. And Pedro, he watched him, and he  
9 was a really, really, really good operator. And Pedro  
10 wanted him to come with us, and then Panda wanted to come  
11 work with us too, so then they brung him over.

12 Q Okay. And you said Juan was a really good  
13 operator. What was he operating?

14 A He could operate anything you put him on. He's  
15 really good.

16 Q And what does that mean? Tell me --

17 A He could do front-end loading with the loader,  
18 excavator. I seen him on the excavator, the dozer and the  
19 loader.

20 Q And these are all machines that you yourself  
21 have operated as well, right?

22 A Yes, ma'am.

23 Q So you kind of have a tendency it sounds like of  
24 who's good at it and who's not?

25 A Yes, ma'am.

1 Q And you would put Juan in the category of being  
2 good at it?

3 A Yes. I work down beside him with shovels, and I  
4 felt perfectly safe.

5 Q You would be on the ground shoveling next to him  
6 operating a giant construction vehicle?

7 A Yes, and I would feel perfectly safe.

8 Q Okay. What was he like?

9 A He was always smiling and happy. He was nice.

10 Q Did you know anything about his personal life?

11 A He told me one time he had a daughter.

12 Q Anything else that you remember?

13 A Like his personal life, no.

14 Q Did he always show up to work on time?

15 A Yes, ma'am.

16 Q Did he have any issues with like arguing with  
17 people or not doing what he was supposed to or anything  
18 like that?

19 A No. He always listened to whatever he was told  
20 to do.

21 Q And what about, like, ever being, you know,  
22 under the influence of anything or getting into any  
23 trouble with any drugs or alcohol or anything like that?

24 A Not that I know of. Not at work. No, ma'am.  
25 That I know of, no.

1           Q     Did he seem to get along with everybody in the  
2 crew?

3           A     Yes, ma'am.

4           Q     Did you know where he was from?

5           A     I never asked him. I just worked with him. I  
6 didn't hang out.

7           Q     I understand.

8           A     Yeah.

9           Q     I just didn't know if you knew how he came to  
10 this country or anything like that.

11          A     Well, I mean, I figured he came from a different  
12 country. Because, I mean, he said his daughter was -- I  
13 think he said she was in Honduras. I mean, with his kids  
14 over there, I would assume.

15          Q     Was that common at Archer Western for people to  
16 be here who didn't -- either didn't speak English or  
17 potentially were not from this country?

18          A     I couldn't answer that because I don't talk to  
19 other -- I came to do my job. I talked to the people in  
20 my crew. I didn't talk to other people.

21          Q     Okay. What about anybody else on your crew?  
22 Anybody else on your crew that wasn't from this country  
23 that you're aware of?

24          A     They were all kin. They're all family, so I  
25 would assume. They all come from the same -- I never

1 really asked them questions, personal questions.

2 Q I understand. Did they all speak Spanish?

3 A Yes, ma'am.

4 Q Did any of them speak English?

5 A Pedro could speak some English, yes.

6 Q Okay.

7 A And so could Jose. He could speak -- not like  
8 fluent. Jose couldn't speak fluent English, but he could  
9 understand you when you spoke in English.

10 Q Okay. What about Juan? Did he speak any  
11 English?

12 A No.

13 Q Anything else that you remember about Juan in  
14 terms of like his -- you said he had a daughter. Anything  
15 else that you remember him telling you about where he's  
16 from or anything like that?

17 A He was -- he just told me that -- we were  
18 talking about kids, and I was talking about my kids. Then  
19 he told me -- he showed me just a picture of his daughter.  
20 That's all he said. I mean, he was very -- you know, you  
21 could tell he loved his kid. Like, you know, This one is  
22 mine. You know.

23 Q Do you know anything about where he lived or who  
24 he lived with?

25 A No, ma'am. I believe he lived in Tampa.

1 Q what makes you think that?

2 A Because they always talk about they go over the  
3 bridge, so that's Tampa that way.

4 Q Okay. Did he seem to get along with everybody  
5 else in the crew?

6 A To me, yeah. He never had problems with  
7 anybody.

8 Q Okay. So how often -- was this a Monday through  
9 Friday kind of job? Overnight? What was the shift that  
10 you were working?

11 A We worked overnight. We would come in at six  
12 and get off whenever we finished or Pedro said we go home.

13 Q Okay. And what days was that?

14 A Usually it's a ten-hour shift.

15 Q Okay.

16 A Six days a week. So our week started Sunday  
17 night. We were off Saturday night.

18 Q Six days a week, ten hours?

19 A Well, Friday and Saturday you could do eight,  
20 but usually it was when Pedro decided we'd done enough, we  
21 would go home.

22 Q And so you saw Juan for about three months kind  
23 of six days a week. Is that fair to say?

24 A Uh-huh.

25 Q Had you had much interaction with any of the



1 deputies that were working security for this construction  
2 site?

3 A Like, talk to them and stuff?

4 Q Yeah.

5 A No. No, ma'am.

6 Q Did you ever talk to Deputy Hartwick in this  
7 case?

8 A No, ma'am.

9 Q Okay. And I know you gave a recorded statement  
10 to the police this night.

11 A Uh-huh.

12 Q Have you had a chance to listen to that or  
13 anything like that?

14 A No, ma'am.

15 Q Do you remember being asked the question about  
16 whether the officers would get out of their cars or not?  
17 Do you remember the deputy asking you that question?

18 A Yes. They're not like -- I never -- I think I  
19 seen one out one time. They never got out of their cars.

20 Q Okay. And that was something unusual if they  
21 had been -- if the deputy was out of their car?

22 A Yes. You never seen them out of their vehicles.

23 Q And I think you said Cody Gardner, he was the  
24 person that was sort of in charge of placing the officers.  
25 Is that right?

1 A Yes, ma'am.

2 Q Is he still working for Archer Western do you  
3 know?

4 A No, ma'am. I haven't seen him.

5 Q Okay. Do you know what happened to him?

6 A No, ma'am. I mean -- no. Like, he was in  
7 charge of MOT and stuff. That's a total different  
8 department than me.

9 Q Okay. What's MOT?

10 A They do, like, the traffic, the cones, the lane  
11 closures.

12 Q Do you know what MOT stands for?

13 A No. Sorry.

14 Q That's okay. So talk me a little bit through --  
15 I want to talk about the night that this happened. Who --  
16 did you get to work about 6 p.m. that night like normal?

17 A Yes, ma'am.

18 Q What were you supposed to do? What were you  
19 guys supposed to be doing that night?

20 A I was -- well, me, Glidden, and George, we were  
21 going to remove some air well off of ramp P, and Pedro,  
22 Jose, Nicole, and Panda were going to -- it was like a  
23 little piece of grade work, but the mini didn't work. So  
24 they were going to go do the grade work with the dozer on  
25 the shoulder, and the last time I seen them that night was

1 when they walked down the slope from where we were at. We  
2 didn't work together that night.

3 Q Okay. And so when you said the mini didn't  
4 work, what's the mini?

5 A The mini excavator.

6 Q So did you see Juan in the front loader that  
7 night or Panda as you call him?

8 A No, ma'am.

9 Q Okay. So what time did you all sort of  
10 separate? You said they went down the hill. About what  
11 time was that?

12 A I'm going to say maybe seven. Well, I'll give  
13 it a little bit later because we had to go get ice and  
14 everything. Probably like maybe 7:30, 8.

15 Q Okay. And then when do you next -- what sort of  
16 happens that you find out that there's an accident  
17 involved? What's the first thing that you're made aware  
18 of?

19 A Pedro called me.

20 Q Okay.

21 A I was on -- the semi-driver that was on 275, he  
22 called me and told me the lane closure was up. So I took  
23 and started escorting my loader with Glidden, and George  
24 was with me. We were going around to go unload the  
25 trailer full of barrels at the time. So when I was coming

1 down the ramp I got -- first I got a call from Panda's  
2 phone, but I couldn't like -- you couldn't hear nothing.  
3 Then at the same time, Pedro started calling me through,  
4 so I answered over to Pedro's. It was Pedro that made me  
5 aware.

6 Q And what did Pedro say?

7 A That there was an accident. That, you know,  
8 they found the officer. And I asked them where -- go  
9 ahead.

10 Q No, go ahead.

11 A I asked and he told me they up -- coming up. I  
12 was like, where are you? He said, Come up forward. I  
13 guess he seen me coming down the ramp.

14 Q Okay. What was Pedro's demeanor like?

15 A When we got -- when I got where they were at?

16 Q On the phone.

17 A He sounded calm.

18 Q Okay. Did he tell you --

19 A I honestly --

20 Q -- what happened?

21 A No, ma'am.

22 Q What did he say exactly the best you recall?

23 A That they found an officer. Honestly, at first,  
24 I thought -- I didn't understand if he said that they  
25 found an officer or they hit, you know, an officer. So

1 I'm like, well, where are you now? I started asking him  
2 where he was at and stuff, and he said keep driving  
3 forward. That's when I like -- he was calm, talking like  
4 we're talking.

5 Q Was he speaking in Spanish or in English?

6 A In Spanish.

7 Q Okay. And you're not sure if he said we found  
8 the officer or we hit the officer.

9 A (Spanish) La controla policia (phonetic). I  
10 think that's what he said. They found an officer.

11 Q Okay. And how far away were you? Like, how far  
12 away in a distance were you to where they were?

13 A Maybe -- it wasn't -- let's see. The ramp -- I  
14 would say maybe half-a-mile.

15 Q How long did --

16 A I was coming towards them.

17 Q Okay. How long did it take you to get there? A  
18 minute? Two minutes?

19 A Maybe a minute. It wasn't long. I mean,  
20 because I was already coming. And the lane closure was up  
21 where we were at. So Glidden pulled into the side, and I  
22 just went around him and kept going straight.

23 Q Okay. And when you get up to where they are,  
24 what do you see?

25 A I seen the officer laying on the ground. Pedro

1 and Jose and his daughter was in the truck, and I jumped  
2 out of the truck that I was in and started screaming what  
3 happened and, you know, trying to help the officer. I was  
4 screaming asking if he was okay, but he didn't make no  
5 response. I was screaming telling them to help me, but  
6 they didn't, like, get out and help me. I tried to  
7 call --

8 Q When you say they didn't get out and help you,  
9 Pedro didn't get out and help you?

10 A They were sitting in the truck.

11 Q And you didn't see Panda there, right?

12 A No, ma'am. I didn't see him.

13 Q Okay. How close did you get to the officer?

14 A Pretty close.

15 Q Were you able to see whether or not he was  
16 moving at all?

17 A He wasn't moving.

18 Q And I understand you're not a doctor or an EMT,  
19 but in your sort of lay opinion and witness, did it appear  
20 that he was already deceased?

21 A Yes, ma'am.

22 Q And what about his appearance made you believe  
23 that?

24 A He had -- the way he was laying, he wasn't  
25 moving, and I was screaming, you know, trying to like --

1 are you okay? I was afraid to touch him. And he didn't  
2 move. You know, I didn't see no -- you didn't hear no  
3 noise or nothing. All I heard was the radio chatter of  
4 his police radio thing he had on.

5 Q No gurgling in his throat or anything like that?

6 A No, ma'am.

7 Q No breathing that you could detect, movement up  
8 or down?

9 A No, ma'am.

10 Q No response to your screaming?

11 A No, ma'am.

12 Q And you did not touch him. Is that right?

13 A No, ma'am.

14 Q Did anyone else? Did Pedro or anybody else ever  
15 get out of the truck and get closer to him?

16 A I believe they got out when I took off running  
17 because I seen the inspector's truck. I tried to call  
18 9-1-1, and I was like -- I don't know. I was over -- I  
19 was panicking. It said press one for English. Like, I  
20 don't understand why 9-1-1 said that kind of stuff. So I  
21 seen the truck, and I just went running to the next truck  
22 I seen banging on the window for them to help me.

23 Q And was that Kenny Rogers whose window you  
24 banged on?

25 A Yes, ma'am.

1 Q How far did you run?

2 A I would say maybe 1500 feet. It wasn't that far  
3 up.

4 Q And what did Kenny do?

5 A He jumped out and ran down with me. He's the  
6 one who made another call to 9-1-1.

7 Q Okay. And then how -- did he touch the deputy  
8 at all?

9 A No. Once when the fire -- the fire department  
10 got there first. And then another deputy came, but it was  
11 on the opposite side of the road. And he told -- he  
12 said -- I remember him yelling and telling us to get the  
13 "F" back. You know?

14 Q Okay. How soon did the officers arrive?

15 A I don't remember. To me, honestly, it felt like  
16 forever. I didn't understand why I could see a cop up in  
17 the distance that was still parked there where Cody had  
18 left them. I didn't understand why he wasn't coming  
19 backwards. I mean, it probably wasn't that long. Just to  
20 me it felt like forever.

21 Q Okay. And then when they get on scene, do you  
22 stay right there, or do they sort of push you guys out of  
23 the way?

24 A We're kind of moved down, like down, and we all  
25 sit on the side of the road.



1 Q Did you get any more phonecalls from Juan or  
2 Panda that night?

3 A I don't remember. Because, like, I wasn't even  
4 with my phone and stuff. I know Pedro's wife had text my  
5 phone, and I believe his daughter used my phone to call  
6 his wife back. But I do know I tried to call Panda, and  
7 he didn't answer.

8 Q When was that?

9 A I don't remember. It was during -- like, right  
10 around the time.

11 Q Did Pedro tell you that Juan or Panda was  
12 involved?

13 A No. I asked Pedro what happened, and he said he  
14 didn't know.

15 Q And so what made you call Juan? Because he was  
16 the only one --

17 A He wasn't there. I asked Pedro where he was at,  
18 and he said he don't know. He just kept going he don't  
19 know.

20 Q Did anybody on your crew tell you that they saw  
21 the accident?

22 A No, ma'am.

23 Q Did you think that was odd?

24 A Well, no. Because at the same time, there was  
25 another accident that had happened, and I -- for some

1 reason, I just assumed maybe it was all connected. You  
2 know, like the car -- it happened almost at the same time.

3 Q Okay. Right, the car that went over the  
4 overpass?

5 A Yes, ma'am. I didn't find out until later I  
6 think when they took Pedro and they questioned him, and  
7 then I guess Pedro --

8 Q So when did you first learn that Juan was  
9 supposed to have been driving?

10 A A few hours in. Probably sitting on the side of  
11 the road.

12 Q Did you talk -- did you and Pedro talk back and  
13 forth about what happened?

14 A No. We wasn't allowed to talk to each other.

15 Q And you said at one point Pedro's daughter used  
16 your phone. Were you holding your phone? Did Pedro have  
17 your phone?

18 A They -- his wife text my phone. She said -- it  
19 wasn't even a saved number. She said it was his wife. I  
20 don't know who gave her my number. But I remember that  
21 his daughter was sitting closest to me, and I just gave  
22 her my phone.

23 Q Do you remember what the text said?

24 A (Spanish) Soy la esposa de Pedro. Que si todo  
25 esta bien (phonetic). So I guess he was in contact with

1 his wife, and it was like -- I guess he quit contact with  
2 his wife or whatever, and she got my number. I don't know  
3 where he got my number from. I never talked to her before.

4 Q I speak some Spanish. I should say my Spanish  
5 is decent, but This is Pedro's wife. Is everything okay?  
6 Is that what the English translation to that is?

7 A Yes. So I'm guessing maybe he talked to his  
8 wife. I can't say yes. I don't know.

9 Q Do you ever see Juan when he is taken into  
10 custody?

11 A Yes. It was later. It was in the daytime. We  
12 had to sit there for hours. It was like 8:30 something  
13 like when we finally was able to -- in the morning, and I  
14 seen when they were bringing him to the trailer that they  
15 had out there.

16 Q Anything that you remember about his demeanor,  
17 like what he was doing or anything like that?

18 A I just -- he looked like he was crying.

19 Q Kind of different I assume than the -- you said  
20 he's sort of always --

21 A Yeah. He was always bubbly, happy.

22 Q Okay. And I don't want to put words in your  
23 mouth. You said you thought he was crying. Anything else  
24 about his facial expression that stood out to you?

25 A It didn't look like him honestly.

1 Q Did you ever get a chance to speak to him?

2 A No. No, ma'am.

3 Q I assume you haven't spoken to him since, since  
4 he's been in the jail?

5 A No, ma'am.

6 Q Have you spoken to anybody else, like, after  
7 this? After you guys are all questioned by police, did  
8 you talk to Pedro or anything like that?

9 A No. The last time I seen them was when we were  
10 walking down the ramp. Because we had to go to Tampa  
11 after that to the Archer Western place, but they went in a  
12 different vehicle than me. That was last I seen them.

13 Q Okay. And I know you gave a recorded statement  
14 to the police. Did they bring you in a command center or  
15 something like that? Does that sound right?

16 A No, ma'am. I was in a car.

17 Q Okay. Any other recorded statements that you  
18 gave?

19 A Not that I remember.

20 Q Did you ever go into any meetings at the State  
21 Attorney's office or anything like that to give testimony  
22 or anything like that?

23 A The only thing I've ever done was went to that  
24 one in Tampa.

25 Q Okay. Did you do any -- before that deposition,

1 did you meet with any attorneys to like prep or go over  
2 your testimony or anything like that?

3 A The attorney called me, but we didn't  
4 really like -- I wouldn't say go over, you know, no  
5 statement.

6 Q And there's nothing wrong with that. Attorneys  
7 are allowed to talk to witnesses all the time, to like  
8 talk about what their testimony might be. So I'm  
9 certainly not implying anything. I just didn't know. Who  
10 was the attorney? Was it Archer Western's attorney?

11 A Yes, ma'am.

12 Q Okay. And do you remember what they told you?

13 A Just about -- they had asked me about, you know,  
14 the deposition, have I ever been to one. There was -- I  
15 guess there was another lady. I guess it was the attorney  
16 for the deputy.

17 Q Did they tell you about anything you don't have  
18 to answer or shouldn't answer or anything like that?

19 A No. They just told me yes and no, and if I  
20 don't know the answer, don't make assumptions.

21 Q Okay. Did they talk to you about any of, like,  
22 Archer Western's hiring practices or hiring people or  
23 anything like that?

24 A No, ma'am.

25 Q Do you have any knowledge about Archer Western's

1 hiring practices and -- sort of outside your own  
2 experience -- how they hire people and who they hire?

3 A No, ma'am. I don't work in the office. I work  
4 in the field.

5 Q Okay. Did you have to like go through a  
6 background check or anything like that when you started  
7 working for them?

8 A You get -- they do some kind of e-verify and  
9 stuff like that, yes, and you fill out paperwork.

10 Q Okay. Do you know anything the e-verify process  
11 entails?

12 A No, ma'am.

13 Q Did you hear about it from anyone else working?  
14 In the four years that you've worked for them, anything  
15 that you've sort of heard about their hiring practices or  
16 their verification of employees or anything like that?

17 A No, ma'am. Like, what I -- my two children work  
18 here with me. I just asked Jake, hey, you know, and just  
19 through the office got the application.

20 Q Okay. So you actually were able to get two of  
21 your children hired there --

22 A Yes.

23 Q -- with just sort of these are my kids and --

24 A No, no. You have to go in and do your  
25 application. They go to orientation. You do all that

1 stuff. Yes, ma'am.

2 Q Sure. Okay. Were there a large number of  
3 Spanish-speaking individuals working for Archer Western?  
4 And I'm talking about in this time, this sort of  
5 three-month time span that you worked with Juan, if you  
6 know.

7 A I don't know. I work nights, not daytime. So  
8 you didn't really see people.

9 Q Everyone on your crew was Spanish-speaking  
10 though?

11 A My crew before was only Pedro -- Pedro was the  
12 only Spanish speaker. It was all white and black, so --

13 Q Okay. But this particular crew was all Spanish  
14 speakers?

15 A Yes.

16 Q When -- sort of after all this happened and you  
17 saw I guess Juan being taken into custody -- at some point  
18 I assume you were allowed to leave, right?

19 A Uh-huh.

20 Q And then kind of what happens? Do you come in  
21 to work the next day? What happens next?

22 A No, ma'am. I went to -- I stayed home for a  
23 couple of days, and then I guess they had -- nobody  
24 worked. The whole company shut down.

25 Q Okay. How long did the company shut down?

1           A     I don't remember. But I know I came back when I  
2 was -- I came back when I was ready.

3           Q     Okay. Did they offer you any kind of counseling  
4 or anything like that?

5           A     Yes, ma'am.

6           Q     Did you take them up on that?

7           A     No, ma'am.

8           Q     Did you feel like you didn't need to or --

9           A     I just see my own personal doctor.

10          Q     When you finally came back to work, about how  
11 long was it would you say?

12          A     I think I stayed out like three days.

13          Q     And then when you came back, were there any  
14 meetings or anything like that within Archer Western to  
15 sort of debrief, talk about what happened?

16          A     I believe we had a safety meeting. Yes, we had  
17 a safety meeting and everything.

18          Q     What was context of that?

19          A     I didn't come back when everybody else came  
20 back. I came back a couple of days later.

21          Q     Did you attend the safety meeting?

22          A     No, because I wasn't here.

23          Q     Okay. Do you know what --

24          A     I can't -- no, I can't, because I wasn't there.  
25 I don't know.



1 Q Did you hear --

2 A We have safety meetings all the time.

3 Q Was the safety meeting -- if you know and if you  
4 don't know, that's okay -- prompted by this accident? I  
5 mean, was there a meeting saying, hey, this happened, this  
6 is what we need to do different or not?

7 A I'm not sure what the meeting would have been  
8 about.

9 Q Were you ever given any sort of additional  
10 training or information about, hey, this happened, this is  
11 what we have to do differently?

12 A No, ma'am.

13 Q Did you hear about it from anybody else, any of  
14 your crew about what you were -- anything from the safety  
15 meeting or any different procedures or protocols in place?

16 A No, ma'am.

17 Q Were there any protocol changes that you're  
18 aware of after this accident?

19 A Not really. No, not really. Everything like --  
20 no. More cautious I guess you could say.

21 Q What do you mean?

22 A Well, I am myself honestly. I'm more cautious  
23 of everything. You know?

24 Q Yeah. What did you -- did you sort of do any of  
25 your own kind of research into -- like, did you follow

1 news articles about the case, things like that?

2 A I believe there was something in the newspaper  
3 not too long ago, but I don't -- it wasn't about Panda. I  
4 think it was Ron DeSantis saying he's going to crack down  
5 on illegals and stuff like that.

6 Q And who said that?

7 A It was in the newspaper.

8 Q Who said they were going to crack down on  
9 illegals?

10 A Ron DeSantis, the governor.

11 Q Okay.

12 A That's what that article was.

13 Q What was there any conversation in and around  
14 Archer Western that you heard that that was something they  
15 were concerned about?

16 A No. It was just something I seen in the paper.  
17 I thought you asked did I see anything in the newspaper  
18 and stuff.

19 Q I did, yeah.

20 A Just that.

21 Q Did you follow anything about Juan's case  
22 specifically and about sort of the charges or what he's  
23 facing or anything like that?

24 A I don't know what he's facing or his charges or  
25 anything. I don't. No, ma'am, I don't. I don't even

1 know who to ask.

2 Q Okay. You went back to work you said sort of  
3 three days later.

4 A It was a few days later.

5 Q Okay. Who on the crew was still there when you  
6 went back?

7 A Me.

8 Q Panda is gone. You're there.

9 A Me.

10 Q Pedro is gone?

11 A Everybody. Just me.

12 Q Okay. Do you know what happened to the rest of  
13 the crew?

14 A I never even -- well, I never really even asked  
15 because I came back in the daytime, not at nighttime  
16 because -- I started working daytime. But I -- they never  
17 came back after, and that night, I never seen them again.

18 Q Okay. Did you then start with a whole new crew?

19 A I was back with Al for a little bit, yeah.

20 Q And then when did you kind of formally become  
21 foreman?

22 A I was basic -- I guess the same time, like when  
23 I came back.

24 Q Okay. And do you work days now, or do you work  
25 nights?

1           A     I work days day.

2           Q     Okay. And is that something that you chose as a  
3 result of this incident? Like, you didn't want to be at  
4 night anymore?

5           A     I just chose to come back to days.

6           Q     Okay. Before this deposition today, did you let  
7 people at Archer Western know you had a subpoena and were  
8 being subpoenaed for deposition today, like any of your  
9 supervisors or anything like that?

10          A     I told my superintendent because I didn't know  
11 how to set up the thing.

12          Q     Okay. Who's your superintendent now? Is it  
13 still Jake?

14          A     Yes, ma'am.

15          Q     Did they give you any instruction or anything  
16 like that about how to answer questions or what to say or  
17 what not to say or anything like that?

18          A     No, ma'am.

19          Q     Did you meet with any lawyers from Archer  
20 Western before our deposition today?

21          A     No, ma'am.

22          Q     Do you know anything about the civil case and  
23 the outcome of it?

24          A     No, ma'am, I don't.

25          Q     Is that something that you follow or would

1 search for? Anything like that?

2 A No. I haven't searched it.

3 Q Okay. Any other, like, conversation that you've  
4 heard about either the civil suit or the criminal case  
5 that you can think of?

6 A No.

7 Q There was -- my understanding is there was  
8 another accident before this where an Archer Western  
9 worker got crushed by a piece of concrete, like, in the  
10 head. Are you familiar with that?

11 A Before --

12 Q Not killed or anything but he was injured by it.

13 A Before this?

14 Q Uh-huh.

15 A I remember one got hurt. I don't know  
16 like where, but like we had -- he got hit with a pile. I  
17 remember that.

18 Q Maybe it wasn't in the head, but I think that's  
19 probably what I'm talking about. He got hit by like a big  
20 beam?

21 A Uh-huh.

22 Q Do you know who that worker was?

23 A No, ma'am. I never met him.

24 Q Okay. Were you like on that scene or on that  
25 crew or anything, or you just heard about it?

1           A     No, ma'am. Just we heard about it.

2           Q     What do you remember hearing about it?

3           A     The crane, I guess, pulled up when he was  
4 cutting it. He had too much tension, and it caused --  
5 when he cut it, it snapped. But that's just people  
6 talking, the workers.

7           Q     I understand. In a deposition we're sort of  
8 allowed to ask those kind of questions. In a courtroom,  
9 sometimes it's different about hearsay and things like  
10 that.

11          A     Okay.

12          Q     In a deposition, we get it. I'm not holding you  
13 to that it's true. I just want to know what you heard.

14          A     We had a big -- I remember there was a big  
15 safety meeting about it.

16          Q     Do you remember anything about that worker,  
17 whether he was from this country or not?

18          A     I don't even know who it was.

19          Q     Do you remember like --

20          A     That's totally different people. Like, for work  
21 what I do, I wouldn't even be working near them.

22          Q     In that safety meeting, was there any  
23 conversation about reporting these kind of incidents or  
24 anything like that that you can recall?

25          A     What do you mean reporting?

1 Q Like reporting accidents that happen in the  
2 workplace or anything like that, like having to report it  
3 to authorities or report it to the government?

4 A We report anything that happens to safety. Yes,  
5 ma'am.

6 Q Okay. Did you -- and I know you said that --  
7 hang on one second. Sorry. You didn't know -- you heard  
8 about the accident with the guy with the crane?

9 A Yeah. I don't know nothing about it though.

10 Q Okay. How did you hear about it?

11 A Like, the people talking, like Pedro and them.

12 Q What do you remember them saying?

13 A He had told me that he had heard that there was  
14 somebody that got hit with a pile. It was from my own  
15 crew because I don't talk to the other -- I didn't  
16 socialize with the other crews like that.

17 Q Okay. No, I get it. I'm just trying to  
18 understand.

19 A I'm a woman in male dominant -- I just kind of  
20 do my job.

21 Q Okay. After you go back to work, I know you  
22 said there was a safety meeting, which you didn't attend.  
23 Were there any other meetings or briefings or instructions  
24 about anything about this case?

25 A No, ma'am. Not that I recall, no.

1           Q    Any e-mails or anything to tell you not to talk  
2 to the press or to talk to cooperate or anything like  
3 that?

4           A    No, ma'am.

5           Q    Did you get any instruction one way or the  
6 other?

7           A    No. They didn't tell me not to talk to anybody.  
8 I was asked if I needed counseling, which the whole -- I  
9 guess it's available for the whole company if they need  
10 it. They had counselors here, but I didn't -- I just went  
11 to my own doctor.

12          Q    Okay. Give me just one second.

13                when you let Jake know about your subpoena for  
14 this deposition, did he say anything to you? Give you any  
15 advice about the deposition or anything like that?

16          A    No, ma'am. I just asked him if he would help me  
17 to set up the thing because I don't have it on my phone,  
18 and my phone will go off.

19          Q    Okay. Is there anything else today that I  
20 haven't asked you that you're like this is such an  
21 important thing that I want the lawyer representing Juan  
22 to know? Is there anything I didn't ask you that you're  
23 like if I leave here without telling her this, I'm going  
24 to regret it?

25          A    He was a really nice person, and he was a really



1 good operator. He honestly was. I don't understand how  
2 that all happened. Like, I don't know why he ran. I  
3 really wish he wouldn't have.

4 MS. DELIBERATO: Understood. Nichole, do you  
5 have any other questions?

6 MS. BLAQUIERE: Thanks for the last comments,  
7 Ms. Caudill.

8 MS. DELIBERATO: Nathan? Liz.

9 MR. VONDERHEIDE: No questions.

10 MS. CONSTANTINE: No questions.

11 MS. DELIBERATO: Thank you so much. So the  
12 court reporter is typing everything up, and you  
13 can -- you have a right to read it if you want to  
14 before it's all typed up and finished to make sure  
15 that you didn't say anything that you -- that it's  
16 typed down wrong basically, that you didn't mean it a  
17 certain way or something like that. You can do that,  
18 and she can e-mail it to you. Or you can waive that,  
19 and she'll just type it up. Up to you.

20 THE DEPONENT: Okay. She can e-mail me if she  
21 wants. I didn't never -- I didn't never get nothing  
22 like that before.

23 MS. DELIBERATO: It's up to you. The only thing  
24 you have to do is choose. You can waive it or read  
25 it. It's entirely up to you. You'll get a copy

1 afterwards no matter what, but you get a chance to  
2 read it before if you'd like.

3 THE DEPONENT: I can read it. It doesn't  
4 matter. Yeah, that's fine.

5 MS. DELIBERATO: You want to wait until it's  
6 typed and then read it?

7 THE DEPONENT: Yes, ma'am, that's fine. I don't  
8 want to make everything harder.

9 MS. DELIBERATO: I appreciate it very much.  
10 Thank you.

11 (Deposition concludes at 3:50 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 LAURA  
6 CAUDILL personally appeared before me by ZOOM  
7 videoconference on the 26th day of March, and was duly  
8 sworn.

9 witness my hand and official seal this 27th day  
10 of September, 2024.

11  
12 Tamara M. Pacheco

13 Tamara M. Pacheco, RPR  
14 COMMISSION # 474485  
EXPIRES: March 30, 2028

IN THE CASE OF: STATE OF FL v. JUAN MOLINA-SALLES  
NAME OF DEPONENT: LAURA CAUDILL  
CASE NUMBER: 22-09348CFANO

PAGE	LINE	ERROR/AMENDMENT	REASON FOR CHANGE
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Date

## 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 LAURA CAUDILL; 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. Pacheco*16 Tamara M. Pacheco, RPR  
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