

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:

DOUGLAS VALLADARAS

TAKEN BY:

Counsel for the Defendant

DATE:

September 24, 2024

TIME:

2:34 p.m. - 3:05 p.m.

PLACE:

ZOOM videoconference

REPORTED BY:

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

Pages 1 - 22

JTP REPORTING (727) 422-8287

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ALSO PRESENT:

Erick Alin - Spanish Interpreter

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EXHIBITS

(No exhibits were marked for identification.)

1 WHEREUPON,

2 ERICK ALIN

3 (the Interpreter herein, was first duly sworn to translate
4 the proceedings from English to Spanish and Spanish to
5 English as follows:)

6 whereupon,

7 DOUGLAS VALLADARAS

8 (the Deponent herein, being first duly sworn through the
9 Spanish interpreter, was examined and testified as
10 follows:)

11 (All answers through the Interpreter unless indicated in
12 colloquy.)

13 EXAMINATION

14 BY MS. DELIBERATO:

15 Q Good afternoon. Could you please state your
16 name.

17 THE INTERPRETER: The interpreter would like for
18 him to repeat his name again.

19 A Douglas Nau Hernandez Valladaras.

20 Q And are you okay if I address you as
21 Mr. Valladaras?

22 A Yes.

23 Q My name is Maria DeLiberato. I'm an assistant
24 public defender. In the room with me is Nichole
25 Blaquiere. She's also an assistant public defender. And

1 also on the Zoom is Nathan Vonderheide. He's the
2 prosecutor on the case. I represent Juan Molina-Salles.
3 And also on the line who can hear us is Hunter Chamberlin,
4 who is your attorney.

5 MR. CHAMBERLIN: Hola, Douglas. Estoy aqui.

6 THE DEPONENT: Okay.

7 Q (By Ms. Deliberato) If at any time during the
8 deposition you need to talk privately to Hunter -- to
9 Mr. Chamberlin, you can do so, and we'll mute ourselves
10 out.

11 A Okay.

12 Q So we're here for your deposition today to ask
13 you some questions about the night of the accident at
14 Archer Western. Okay?

15 A Yes.

16 Q Have you ever given a deposition before?

17 A Yes.

18 Q So the most important thing is for you to answer
19 my questions out loud, yes and no. Don't shake your head,
20 things like that. Okay?

21 A Yes, that's good.

22 Q And if you don't understand one of my questions,
23 please ask me and I'll repeat it.

24 A Yes, that's good.

25 Q So a little bit of background information about

1 you. Can you tell me your date of birth?

2 A July 31, 1984.

3 Q And where were you born?

4 A Honduras.

5 Q where in Honduras?

6 A In the Department of Danli Paraiso.

7 Q when did you first come to the United States?

8 A 2005.

9 Q And how did you come here?

10 A Illegal.

11 Q And where in the United States did you come?

12 A The city that I came to is called Pensacola.

13 Q Did you have family here?

14 A No.

15 Q who did you come here with?

16 A Me alone.

17 Q when did you first come to the Tampa/St. Pete
18 area?

19 A May of 2021.

20 Q what were you doing for work in Pensacola?

21 A I worked in repairing a roof of homes.

22 Q Have you ever been arrested before?

23 A No.

24 Q Other than for the charges that you're currently
25 arrested for now.

1 A Can you repeat that?

2 Q So right now you're in the Citrus County Jail
3 because you've been arrested for charges about paperwork,
4 giving false paperwork?

5 A Yes.

6 Q Besides that arrest, have you ever been arrested
7 before?

8 A No.

9 Q Anywhere in Florida or anywhere in the United
10 States?

11 A No.

12 Q What about in Honduras?

13 A Neither.

14 Q Okay. When did you start working for Archer
15 Western?

16 A In June. June of 2021.

17 Q How did you hear about the job at Archer
18 Western?

19 A They had signs on the street that said that they
20 were hiring people.

21 Q Okay. Do you know Allan Gomez Zelaya?

22 A Yes.

23 Q How do you know him?

24 A He's my brother-in-law.

25 Q Who is he married to?

1 A with my sister.

2 Q Okay. Did you come to the United States after
3 him or before him?

4 A After him.

5 Q Was he working at Archer Western when you
6 started working there?

7 A Yes.

8 Q Is that how you learned about the job, or you
9 learned about it from the signs?

10 A Through him and the signs.

11 Q Okay. And had you worked in construction
12 before?

13 A Yes.

14 Q You said you did the roofing in Pensacola.
15 Anything else?

16 A Yes, roofing construction.

17 Q When you applied for the Archer Western job,
18 what documents did they ask you for?

19 A The documents that I presented, that's why I'm
20 here arrested.

21 Q I understand, but what did they ask to see?
22 Just a driver's license?

23 A No. ID and a social security.

24 Q And you had those documents, but they didn't
25 belong to you. Is that right?

1 A Yes. Yes.

2 Q Did they ask you for anything else, to present
3 any other documentation?

4 A No.

5 Q Did they ask you your immigration status?

6 A No, neither.

7 Q Okay. What did you do for Archer Western?

8 A I worked as -- I applied as a laborer.

9 Q And what does that mean?

10 A It was the grates that you would lay on the
11 roads. We would do pipes. We would lay asphalt.

12 Q When you started working for Archer Western, did
13 you go right on to the same team as Allan Gomez Zelaya,
14 your brother-in-law?

15 A Yes.

16 Q Was he like the leader of the team?

17 A Yes.

18 Q Okay. Did you ever drive any of the machinery?

19 A No.

20 Q Why not?

21 A No, because I applied as a laborer, and they did
22 not give me work with the machinery. I didn't have the
23 ability.

24 Q Okay. I want to talk to you about the night of
25 the accident. Okay?

1 A Yes, that's good.

2 Q Before I do that, do you know somebody by the
3 name of Victor Vazquez?

4 A No.

5 Q Did you know him as Juan or Victor or Panda?

6 A We knew him as Victor at the job.

7 Q Okay. And he's the one that drives the front
8 loader. Is that right?

9 A Yes.

10 Q How long before the accident did you know him
11 for?

12 A Like, it was when he started working there.
13 Like four months.

14 Q Did you know him from Honduras at all?

15 A No, here. I met him here.

16 Q Here at the job at Archer Western only?

17 A Yes, there. There.

18 Q Did you ever socialize with him, spend time with
19 him outside of work?

20 A We worked together. A few times we went to
21 visit at my brother-in-law's house.

22 Q What was he like as a person?

23 A The little time that I knew him, he was a good
24 person.

25 Q Was he friendly?

1 A Friendly. He was a good friend.

2 Q Did you know anything about his family or why he
3 was in the United States?

4 A No, no. No, no.

5 Q What kind of worker was Juan?

6 A He was a good worker. The little time we worked
7 at the company, he was a good worker.

8 Q Was he good at driving the machinery?

9 A Yeah, he was a good operator.

10 Q Did you observe him personally driving the
11 machinery on many occasions?

12 A Yes.

13 Q Did he drive it in a safe and careful manner?

14 A Yes, careful.

15 Q So the night of this accident, what time did you
16 go to work?

17 A We were going at five. Five, six in the
18 afternoon.

19 Q And what did you do when you got there? What
20 were you assigned to do?

21 A We would put barriers on the road. I would
22 direct him. I would direct the machinery.

23 Q What do you mean --

24 A We did various jobs.

25 Q Okay. How was it that you came to be in the

1 pickup truck following the front loader?

2 A Because me, my brother-in-law, and my niece were
3 doing -- and Victor were doing a job, and they called us
4 to do another job to put the barriers, so we were
5 following the machinery.

6 Q And who was driving the truck?

7 A My brother-in-law, Allan.

8 Q And where were you sitting in the truck?

9 A I was in the back part.

10 Q Had you worked before on evenings when the
11 police officers were there shutting down the road?

12 A Yes. We would put the barriers. Sometimes the
13 police officers were there.

14 Q When the police officers were there providing
15 this sort of security, were they supposed to stay inside
16 of their cars or out of their cars?

17 A No, inside the cars.

18 Q And if they get out -- go ahead.

19 A Sometimes I would see them get out, but the
20 majority of the times, they would just stay in their cars.

21 Q And if they get out of their cars, are they
22 supposed to wear some kind of reflective vest?

23 A Yes.

24 Q And why is that?

25 A It's a vest that reflects you so you can be seen

1 at nighttime with lights.

2 Q Okay. That night when you were in the pickup
3 truck following behind Juan, was there anything unusual
4 about the way Juan was driving?

5 A No. I saw that the machinery was going good,
6 but I was texting with my family in Honduras.

7 Q So you weren't paying a ton of attention as to
8 what was happening?

9 A No. But when we left the area that we were
10 working at, I saw him leave slowly with the machinery.

11 Q And did you talk to him earlier in the evening
12 on your shift?

13 A Yeah, we talked. When we go in, we say hello to
14 each other.

15 Q And did he seem normal and fine like usual?

16 A Yes. Yes, normal like always.

17 Q So when was the first time that you knew
18 something was wrong or something happened? You're texting
19 in the backseat and then what happens?

20 A Yes. We were following behind, and then I saw
21 my brother-in-law stop the car. And then when he stopped
22 the car, my brother-in-law, he told me that the police
23 officer was laying down.

24 Q What else did he say?

25 A No, just that the police officer was laying

1 down.

2 Q was he like -- how was he talking? Fast?
3 Excited?

4 A My brother-in-law?

5 Q Yes.

6 A Yes. He was talking like a person, like, when
7 you're scared.

8 Q Did you ever see the police officer on the
9 ground?

10 A Yes.

11 Q Did you get out of the truck?

12 A No, I did not get out of the truck. When the
13 police officers arrived, they got me out.

14 Q But the police officer that was on the ground,
15 you could see him from the truck window?

16 A Yes. It was in a dark area, but you could see
17 him. You could see him.

18 Q was he moving in any way?

19 A I saw him one time, and then I entered -- and
20 then I entered in the truck because I had never seen a
21 dead person.

22 Q was it clear to you that he was obviously
23 deceased?

24 A No. He was just laying down there. The moment
25 I saw him, I did not see him moving at all.

1 Q what did you do next?

2 A No. Like I said, again, I was in a state of
3 shock. I lost my mind until the police officers got
4 there, and then they took me out of the car.

5 Q Did you ever talk to Juan/Victor?

6 A After the accident or before?

7 Q After.

8 A No.

9 Q Did you hear your brother-in-law talk to him on
10 the phone?

11 A I did not hear. Like I said before, I went into
12 a state of shock, and my mind went blank. I wasn't
13 hearing anything.

14 Q Did your brother-in-law tell you anything that
15 Juan said?

16 A No. After that, we didn't talk. I stayed in
17 the truck.

18 Q Did the -- did Juan driving the front loader,
19 did he stop the front loader at all?

20 A I wouldn't be able to say. Because when he was
21 driving the front loader and we were following him, he got
22 away from us, and he was way ahead of us.

23 Q How far ahead of him -- ahead of you was he?

24 A More or less 40, 50 feet.

25 Q Okay. The police officer's car, you're

1 following in the truck. Can you see the lights from the
2 police officer's car in your face?

3 A Yes, you can see.

4 Q Were they flashing?

5 A Yeah. Yeah, they were flashing. Their lights
6 bothers your vision.

7 Q It bothers your vision how? Does it make it
8 hard to see?

9 A Yes, because the light is turning like this, and
10 the reflection hits your eyes. (Indicating.)

11 Q Does it make it difficult to see if somebody is
12 outside of the police car?

13 A Yes, because the area where we were working was
14 a dark area.

15 Q So you talk to the police that night, and you
16 told them kind of what you know, which isn't very much,
17 right? You didn't see very much?

18 A Yeah, no. Almost -- no.

19 Q Did you ever see Juan again?

20 A No.

21 Q When he was ultimately arrested and kind of put
22 into the police car, did you see him then or no?

23 A No. No, I did not see him.

24 Q Did you ever go back to work for Archer Western?

25 A No. Not -- me and my brother-in-law tried to go

1 back, but they told us that we needed to provide -- to
2 make sure that the documents that we gave them were ours,
3 and because of that, we never went back to work.

4 Q Did they ask you for additional documentation to
5 support that you were who you said you were?

6 A Yeah. Just something that stated that the
7 documents were mine.

8 Q That wasn't -- they didn't ask you that question
9 when you were first hired though, right?

10 A No.

11 Q So at some point you got arrested for giving
12 them the wrong documents. When was that?

13 A We got arrested at my brother-in-law's house.
14 They went and arrested us there.

15 Q When was that?

16 A September 2023.

17 Q And it's my understanding that you've already
18 pled guilty, and you're just awaiting your sentencing. Is
19 that right?

20 A Yes. That's the way it is.

21 Q And has anyone promised you anything about your
22 sentence if you cooperate and testify for the State in
23 this case?

24 A No.

25 Q And is there any benefit you're hoping to

1 receive?

2 A Up to now, there is nothing.

3 Q And have they promised to help you with any
4 immigration or anything like that?

5 A No, nothing.

6 Q Were you held at some point in the Pinellas
7 County Jail?

8 A I was four-and-a-half months in Pinellas.

9 Q Do you know why you got moved to Citrus County?

10 A I don't know.

11 Q When you were in the Pinellas County Jail, did
12 you have any contact with Juan?

13 A No.

14 Q What about with your brother-in-law?

15 A No, my brother-in-law neither. They put me up
16 on the Sixth Floor Central they call it. My
17 brother-in-law was in maximum.

18 Q Okay. Have you understood all of the questions
19 that I asked you today?

20 A Yes.

21 Q Is there anything else that you wish to add or
22 change about any of your answers?

23 A No, no.

24 MS. DELIBERATO: One moment. My co-counsel may
25 have questions.

1 (Pause in deposition.)

2 MS. DELIBERATO: I don't have anymore questions
3 for you. I don't believe the prosecutor does, but
4 I'll let him answer.

5 MR. VONDERHEIDE: No questions. Thank you.

6 MS. DELIBERATO: Hunter, all good?

7 MR. CHAMBERLIN: All good. Good luck.

8 Q (By Ms. Deliberato) Thank you so much for your
9 testimony, Mr. Valladaras. I appreciate it.

10 A Okay. Thank you to you also.

11 (Deposition concludes at 3:05 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 DOUGLAS VALLADARAS personally appeared before me by ZOOM
7 videoconference and was duly sworn.

8 witness my hand and official seal this 13th day
9 of OCTOBER, 2024.

10
11 Tamara M. Pacheco

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

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

NAME OF DEPONENT: DOUGLAS VALLADARAS

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

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 DOUGLAS VALLADARAS; 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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