

EXHIBIT C

**IN THE CIRCUIT COURT FOR PINELLAS COUNTY, FLORIDA
CRIMINAL DIVISION**

**CASE NO.: 22-009348-CF
SECTION: T
JUDGE: Siracusa**

STATE OF FLORIDA,

Vs.

JUAN ARIEL MOLINA-SALLES

AFFIDAVIT OF CRYSTAL ALCALDE

COMES NOW the affiant, Crystal Alcalde, who, under the penalty of perjury, hereby swears and affirms as follows:

1. My name is Crystal Alcalde, and I am employed as an investigator with the Office of the Public Defender. I have been so employed since August of 2023.
2. I also live in Pinellas County and have lived here since August of 2023.
3. I was assigned to work as an assistant investigator in the above captioned case a few days after I started, in August of 2023.
4. Since that time, I have reviewed and heard news coverage about Mr. Molina-Salles, starting with his arrest in September of 2022, and continuing to the present day. I have seen coverage as recently as this morning, February 18, 2025.
5. The news coverage that I have seen and reviewed has been heavily focused on the fact that Mr. Molina-Salles was alleged to have been in the country illegally when the deputy was killed in the construction accident.
6. News articles and tv and internet coverage has been sustained and pervasive. The headlines that I collected included, among others: "A migrant killed a deputy" and "worker[], who was in the U.S. illegally, killed a Pinellas deputy" and "migrant killed Pinellas deputy."
7. There was at least one press conference where the Pinellas Sheriff's Office noted that the construction company had hired "a bunch" of migrants.
8. At the end of 2024, this case was listed in the Tampa Bay Times as one of the top 5 cases in Tampa Bay to watch for 2025.

9. Further, in light of the recent local and national news regarding illegal immigration, Mr. Molina-Salles' case has garnered renewed press attention and coverage in the last months and weeks. Indeed, this case was mentioned just last week at a press conference on the immigration bill that was produced out of the February 2025 special session.
10. The media coverage I have reviewed, especially in recent weeks, demonstrates heightened immigration tension that is specifically directed at Mr. Molina-Salles and the facts of his case.
11. For example, though Mr. Molina-Salles is not charged with any degree of homicide, nearly all the news coverage - on tv, on the internet, and in the newspaper - refers to him has "killing" a deputy. Every article mentions his alleged illegal status, and the tone and tenor of the coverage is that he is already guilty because he was here illegally.
12. As part of my role as an investigator, I have helped with jury selection on two first degree murder cases, one of which resolved on the morning of trial. The other was a three-week long insanity trial where I watched and assisted with jury selection, helped to assess pre-trial publicity, and reviewed juror profiles for possible impartiality.
13. In light of all the foregoing, it does not seem possible that Mr. Molina-Salles could select and receive a fair and impartial jury in Pinellas County.
14. I am available to testify to the contents of this affidavit if necessary.

FURTHER AFFIANT SAYETH NAUGHT.


Crystal Alcalde

SWORN and SUBSCRIBED to on 2/18, 2025, under penalty of perjury.