# EXHIBIT B

## 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 JOHN STEWART**

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

- My name is John Stewart, and I reside at 2130 Burlington Ave North, St. Petersburg, FL 33713.
- 2. I have lived in Pinellas County for 62 years.
- 3. I am aware of the case of the *State of Florida v. Juan Ariel Molina-Salles*, as I have seen and heard news coverage beginning from his arrest in September of 2022 and continuing to the present day, seeing coverage as recently as last week.
- 4. I remember the news coverage at the time was 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.
- 5. News articles and tv and internet coverage was heavy and constant, especially in the first few weeks and months after the accident. The headlines read things like "A migrant killed a deputy" and "worker[], who was in the U.S. illegally, killed a Pinellas deputy."
- 6. There was at least one press conference where the Pinellas Sheriff's Office noted that the construction company had hired "a bunch" of migrants.
- 7. I have learned that Governor DeSantis brought up the case specifically in the gubernatorial debate against Charlie Christ in October of 2022.
- 8. Through the ongoing news coverage, I learned that this was not the first time the construction company was alleged to have been hiring undocumented workers. I learned that in 2021 the company had an undocumented worker who was killed in a construction

accident and that as a result of that the Pinellas Park Police Department reported Archer Western to Immigration and Customs Enforcement.

- 9. At the end of 2024, this case was listed as one of the top 5 cases in Tampa Bay to watch for 2025.
- 10. In light of the recent local and national news regarding illegal immigration, Mr. Molina-Salles' case has garnered renewed press attention and coverage. I have recently learned that this case was mentioned just last week at Governor DeSantis' press conference as he signed the immigration bill produced out of the February 2025 special session.
- 11. As a longtime resident of Pinellas County, the current media coverage is showing bias against immigrants in general, especially those accused of committing crimes.
- 12. In addition to the general anti-immigrant bias in the community, the current and past media coverage has been specifically directed at Mr. Molina-Salles.
- 13. It is my understanding that he is charged with Leaving the Scene of an Accident with Death. He is not charged with any kind of traffic homicide.
- 14. Yet nearly all the news coverage on tv, the internet, and in the newspaper refers to him has "killing" a deputy. And 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.
- 15. In light of all of the foregoing, it does not seem possible that Mr. Molina-Salles could select and receive a fair and impartial jury in Pinellas County.
- 16. I am available to testify to the contents of this affidavit if necessary.

FURTHER AFFIANT SAYETH NAUGHT.

John Stewart

SWORN and SUBSCRIBED to on 2 - 17, 2025, under penalty of perjury.