

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA
3 CASE NO.: 1:21-CV-23267-MOORE/LOUIS

4
5 VICTOR SEPULVEDA,
6 PLAINTIFF,

7
8 VS.

9
10 THE CITY OF DORAL,
11 A MUNICIPAL CORPORATION,
12 OMAR FELIPE, INDIVIDUALLY,
13 ALBERTO TELLEZ, INDIVIDUALLY,
14 MICHAEL ACOSTA, INDIVIDUALLY, AND
15 JAVIER DIAZ, INDIVIDUALLY.
16 DEFENDANTS.

17 _____/
18 VIDEOCONFERENCE DEPOSITION OF HANS GONZALEZ

19 DATE: MARCH 4, 2022

20 REPORTER: EVELYN POYATO

21 PLACE: ALL PARTIES APPEARED VIA VIDEOCONFERENCE

22

23

24

25

1 APPEARANCES

2 ON BEHALF OF THE PLAINTIFF, VICTOR SPELVUDA:

3 Daniel Courtney, Esquire

4 Daniel W Courtney, P.A.

5 10800 Biscayne Boulevard

6 Suite 700

7 Miami, Florida 33161

8 Telephone No.: (305) 579-0008

9 E-mail: dc@danielcourtneylaw.com

10 (Appeared via videoconference)

11

12 ON BEHALF OF THE DEFENDANT, THE CITY OF DORAL, A
13 MUNICIPAL CORPORATION, OMAR FELIPE, INDIVIDUALLY,
14 ALBERTO TELLEZ, INDIVIDUALLY, MICHAEL ACOSTA,
15 INDIVIDUALLY, AND JAVIER DIAZ, INDIVIDUALLY:

16 Mirelis Castilla, Esquire

17 Corey J. Vincent, Esquire

18 Kelley Kronenberg

19 10360 West State Road 84

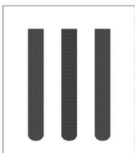
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EXHIBITS

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(None Marked)



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STIPULATION

The videoconference deposition of Hans Gonzalez taken remotely on Thursday the 4th day of March 2022 at approximately 4:18 p.m.; said deposition was taken pursuant to the Florida Rules of Civil Procedure. It is agreed that Evelyn Poyato, being a Notary Public and Court Reporter for the State of Florida, may swear the witness and that the reading and signing of the completed transcript by the witness is not waived.



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PROCEEDINGS

COURT REPORTER: On record. Will all parties except for the witness, please say your appearance, how you are attending, and your location?

MR. COURTNEY: Daniel Courtney for the plaintiff appearing in Miami via Zoom.

MS. CASTILLA: Mirelis Castilla and Corey Vincent on behalf of all of the defendants. I am appearing -- and Corey is in New York.

COURT REPORTER: Mr. Gonzalez, will you please state your full name for the record?

THE WITNESS: Hans, H-A-N-S, Gonzalez, G-O-N-Z-A-L-E-Z.

COURT REPORTER: Since I cannot properly ID the witness, can all parties stipulate that the witness is in fact Mr. Gonzalez?

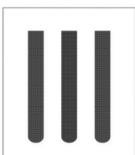
MR. COURTNEY: Yes.

MS. CASTILLA: Yes.

COURT REPORTER: Mr. Gonzalez, will you please raise your right hand up? Do you solemnly swear or affirm that the testimony you're about to give will be the truth, the whole truth, and nothing but the truth?

THE WITNESS: I do.

COURT REPORTER: Thank you. You may begin.



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1 DIRECT EXAMINATION

2 BY MR. COURTNEY:

3 Q Good afternoon, sir.

4 A Good afternoon.

5 Q Please tell me your name.

6 A Hans Gonzalez.

7 Q Who do you work for?

8 A I work for the City of Doral Police
9 Department.

10 Q How long have you worked for them?

11 A I've been employed with the City of Doral
12 since August 7, 2017.

13 Q What is your rank?

14 A I am a police officer.

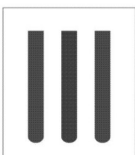
15 Q What, if anything, did you do in preparation
16 for today's deposition?

17 A Not much.

18 Q Okay. Did you look at an arrest form?

19 A No.

20 Q Did you speak to Officer Diaz?

21 A I briefly -- I did speak to him. He did tell
22 me about it, but, you know that this was going on.
23 That's what he told me about it. Nothing else.24 Q Okay. Well, we're here to discuss the case of
25 Victor Sepulveda, which you would have seen him for the

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1 first time on September 13, 2017, about a month or so
2 after you started working with the City of Doral. Do
3 you recall that night?

4 A Okay. Yes.

5 Q Okay. How is it that you first got involved
6 with Victor Sepulveda?

7 A Okay. I'm going to tell you based on my
8 recollection, I do not recall how was it that we got in
9 contact with. I just thought that we responded. I
10 mean, we, I'm talking about my FTO, which is Javier
11 Diaz. We drove to the FHP building, close to Dolphin
12 Mall to assist the other officer that was doing, I
13 guess, a DUI. I remember.

14 Q Do you remember who the other officer was that
15 was doing the DUI?

16 A To be honest with you, I do not remember. No.

17 Q Do you remember if that officer was a male or
18 female?

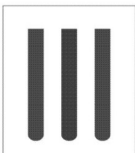
19 A There was males and females there. Yeah. So
20 yes. Males and females.

21 Q Okay. Do you remember if it was Officer
22 Bardelas (phonetic) that was the DUI officer?

23 A Yeah. It could be.

24 Q Okay.

25 A I believe.



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1 Q When you and Officer Diaz reported to FHP, did
2 you assist in transferring Mr. Sepulveda from the
3 parking lot to FHP?

4 A No. We were there at the end. We were there
5 to -- to transport from the building to -- to the jail
6 house. But we were not there -- I don't -- I do not
7 recall being there in the beginning. I don't recall
8 walking with him or -- or the person inside FHP. He was
9 already there when I made contact with him prior.

10 Q And prior, you were that evening riding
11 shotgun with Officer Diaz; is that correct?

12 A That is correct. Yes.

13 Q Officer Diaz was the one who was driving that
14 evening?

15 A He was the one. Yes. He's driving. Yes. He
16 was driving.

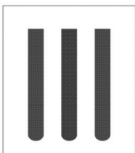
17 Q Okay. And then, were you ever inside the FHP?
18 station that evening?

19 A To escort -- to escort the person out, yes.
20 Back to our car, yes. That's the only time that I was
21 inside.

22 Q Were you ever there inside when he was being
23 offered the opportunity to blow into a breathalyzer?

24 A I don't recall that. I do not recall.

25 Q Were you ever there when he was being given



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1 Miranda rights?

2 A Don't recall that.

3 Q Were you ever there when he was being offered
4 the opportunity to answer questions in an interview?

5 A I do not recall that. To be honest, I do not.

6 Q And that evening, would you have been the
7 entire time kind of shadowing Officer Diaz?

8 A Correct.

9 Q Because for the first couple of months, you
10 got to have an FTO with you, correct?

11 A Right. He was my phase 1 FTO, so he's my
12 beginning training officer. So, I just sit back and pay
13 attention to whatever is it that he does, and ask
14 questions if I have any questions. That's it.

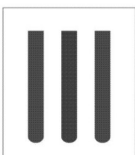
15 Q Would you and Officer Diaz have been the one
16 to escort Mr. Sepulveda from FHP into Mr. Diaz's
17 vehicle?

18 A Did we escort him?

19 Q Yeah. Did you take him from FHP, the
20 building, into Officer Diaz's vehicle?

21 A Yeah. Yes. We escort him to -- yes. From
22 the building to Officer Diaz's vehicle to go to the jail
23 house.

24 Q Do you have any recollection as to whether Mr.
25 Sepulveda resisted in any way?



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1 A I don't recall.

2 Q Do you have any recollection as to whether Mr.
3 Sepulveda was cursing?

4 A Oh, yeah. He was rowdy. That I do remember.
5 He was rowdy.

6 Q What, if anything, specific do you recall him
7 saying?

8 A Just screaming out, not following orders in
9 the sense of, you know, he didn't want to get up when he
10 wanted to get up. He didn't want to sit in the car when
11 he -- he did, though. He did follow the orders. But at
12 the beginning he was -- he -- he showed resistance.

13 Q Okay. And so --

14 A Verbal.

15 Q -- okay. Verbal resistance.

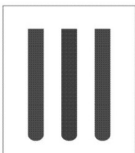
16 A Yeah.

17 Q But in terms of any direct order for him to
18 enter the vehicle, did he obey that order?

19 A No physical. There was no physical resistance
20 that I remembered, no. For me, no.

21 Q Is there ever times where a different person,
22 for example, is resisting going into a vehicle and you
23 have to use a minor amount of force to get a person into
24 a vehicle?

25 A No.



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1 Q Well, has that ever happened in your career?

2 A It does happen, but no. I've never been -- I
3 haven't been in that situation in my career. No.

4 Q Okay. On that evening, did you have to use
5 any force of Mr. Sepulveda?

6 A No, sir.

7 Q Did you observe any other officer use any
8 force with Mr. Sepulveda?

9 A No, sir, I did not.

10 Q Do you recall what time approximately you
11 would have arrived at FHP?

12 A I do not recall, sir. I don't.

13 Q Do you have any idea approximately when you
14 would have transported him from FHP to the jail?

15 A No, sir. I do not recall.

16 Q Do you have any idea how long Mr. Sepulveda
17 would have been inside Officer Diaz's vehicle at the FHP
18 prior to being transported to TGK?

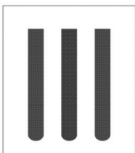
19 A I do not -- no.

20 Q Do you recall transporting him from FHP to
21 TGK?

22 A Yes. I do.

23 Q And so tell me, do you recall the route you
24 would have taken to go from FHP to TGK?

25 A The exact route I do not recall. I wasn't --



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1 Q Do -- okay. Based on your experience, if it's
2 12:30 at night on a Wednesday, and traffic conditions
3 are light, what would be your route to go from FHP to
4 TKG?

5 A So, there's a lot of factors. So I don't
6 think I can answer you that question, you know, clearly
7 like that. I -- because it's a lot of factors. It
8 could be -- so many factors that can be in there, but a
9 specific time, I cannot give you a specific time because
10 of the different routes that we can take, and then
11 that's the reason why we always advise when we leave and
12 when we arrive on the radio.

13 Q When you first -- go ahead. I'm sorry. Did
14 you want to finish?

15 A Yeah. I already did for that purpose.

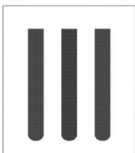
16 Q When you first saw Mr. Sepulveda, was there
17 anything in your mind that led you to believe that he
18 required medical attention?

19 A No.

20 Q When you were by FHP, do you recall anything
21 that Mr. Sepulveda did that may have caused injury to
22 himself?

23 A No. I don't recall it.

24 Q Do you recall anything happening to Mr.
25 Sepulveda when he was in the vehicle with you and



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1 Officer Diaz as you were enroute from the FHP station to
2 TGK?

3 A No, sir. I do not recall.

4 Q Do you recall arriving at TGK with Officer
5 Diaz and Mr. Sepulveda?

6 A I do.

7 Q And what do you recall happening once you were
8 there?

9 A Well, we went through the process of booking,
10 which, you know, changes every once in a while with TGK.
11 But when we got to the medical side, the medical staff
12 told us that he needs to get medically clear based on
13 his allegations.

14 Q And what were his allegations?

15 A That he was speaking to the -- okay. So, he
16 spoke to the doctor or the nurse or whoever was there
17 from Jackson, and he told them verbally that he had a
18 broken jaw.

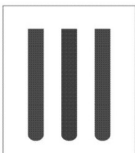
19 Q Okay. And what did the nurse say?

20 A So based on his allegations, he will need to
21 get medically cleared at a hospital.

22 Q Okay. Did he say anything about any kind of
23 injury to any other part of his head?

24 A No. I don't recall that.

25 Q Do you recall observing any swelling around



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1 his jaw?

2 A No, sir. Not that I recall.

3 Q Do you recall -- okay. Do you recall
4 observing any swelling on the top of his head?

5 A No, sir. I do not recall.

6 Q Do you recall observing any lacerations on the
7 top of his head?

8 A I do not recall.

9 Q Where did you guys then take him after the
10 medical provider -- I guess the medical provider told
11 you and Officer Diaz that you need to take him to a
12 hospital; is that correct?

13 A Correct.

14 Q And did that medical provider specifically
15 reference which hospital you guys should take him to?

16 A No. He did not.

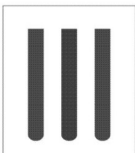
17 Q How did you know which hospital to take him
18 to?

19 A So we go based on previous practice, what is
20 the closest hospital based on the time and what hospital
21 are -- for us at that time.

22 Q Okay. Did any other officers from the City of
23 Doral join you and Officer Diaz at the hospital?

24 A I do not recall.

25 Q Was there any other in terms of -- strike



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1 that. In terms of the car ride from TKG to the
2 hospital, did Mr. Sepulveda do anything in terms of
3 harming himself?

4 A No. I don't recall. I don't recall anything.

5 Q Okay. And then do you remember Officer Diaz
6 speaking to doctors at the hospital?

7 A Don't recall.

8 Q Did you yourself speak to any doctors at the
9 hospital?

10 A I don't recall.

11 Q Is it fair to say that because Officer Diaz
12 was the FTO that if one of you was going to speak to a
13 doctor or nurse at the hospital, it would have been him?

14 A Fair.

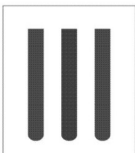
15 Q Okay. Afterwards, did you take him from the
16 hospital to -- back to TKG?

17 A Yes. We did.

18 Q When he is at the hospital, would he have been
19 in handcuffs or not in handcuffs?

20 A I do not recall. He would have been in
21 handcuffs. He was under custody. So he would have been
22 in handcuffs. Yes.

23 Q Did he show any resistance outside of Kendall
24 in terms of going back into the vehicle to go back to
25 jail?



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1 A I do not recall. From the hospital to the
2 jail, I do not recall.

3 Q And from getting out of the vehicle at TGK to
4 go into TGK, do you recall any resistance?

5 A No, sir. Don't recall.

6 Q So is it fair to say that you don't recall any
7 resistance from him that evening, but you do recall bad
8 language, cursing, things like that?

9 A Yes. That's correct.

10 Q Do you know if Mr. Sepulveda had any firearms
11 that night?

12 A I don't recall.

13 Q Do you recall if you ever had to go to
14 retrieve his personal property from Officer Bardelas
15 from her vehicle?

16 A Don't recall.

17 Q Did you do any paperwork in this case?

18 A That I know of, I don't recall. No.

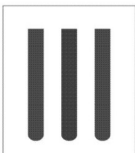
19 Q Since you have been a police officer in August
20 2017, have you had to punch any suspects in the face?

21 A No, sir.

22 Q Have you ever observed Officer Diaz punch
23 anyone in the face?

24 A No, sir.

25 Q Are you aware of whether Officer Felipe has



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1 ever punched a suspect in the face?

2 A No, sir.

3 Q Are you aware of whether Sergeant Tellez
4 (phonetic) has ever punched a suspect in the face?

5 A No, sir.

6 Q Are you aware of whether Officer Acosta has
7 ever punched a suspect in the face?

8 A No, sir.

9 Q Have you ever seen a video of Officer Acosta
10 punching someone in the face who just got stopped after
11 an accident?

12 A No, sir.

13 MR. COURTNEY: I do not have any other
14 questions for you. Thank you for your time.

15 THE WITNESS: Thank you, sir.

16 MS. CASTILLA: I don't have any questions.

17 MR. COURTNEY: Would you like to --

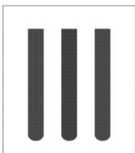
18 MS. CASTILLA: Thank you, Officer Gonzalez.

19 THE WITNESS: No problem.

20 COURT REPORTER: Would you like to read --
21 would you like to read or waive, Mr. Gonzalez?

22 THE WITNESS: Read. I would like to read. Yes.
23 I would like to read.

24 COURT REPORTER: Okay. Mr. Gonzalez, real
25 quick, I need your e-mail to send that read letter.



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1 THE WITNESS: Okay. So my e-mail is Hans,
2 that's H-A-N-S, then . or period, Gonzalez, my last
3 name, G-O-N-Z-A-L-E-Z @doral, that's D-O-R-A-L, pd,
4 papa delta, .com.

5 COURT REPORTER: Perfect. Thank you so much.

6 THE WITNESS: So hans.gonzalez@doralpd.com.

7 COURT REPORTER: Perfect. Got it.

8 MR. COURTNEY: Thank you, Officer. Stay safe.

9 COURT REPORTER: Thank you.

10 MS. CASTILLA: Thank you. Enjoy the rest of
11 your vacation.

12 THE WITNESS: Thank you. Will do. Appreciate
13 you.

14 COURT REPORTER: Mr. Courtney, will you be
15 ordering an original copy of the transcript?

16 MR. COURTNEY: Yes.

17 COURT REPORTER: And Ms. Castilla, will you
18 also be ordering a copy of that?

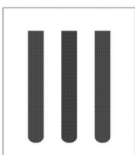
19 MS. CASTILLA: I'll take a copy of the
20 transcript. Thank you.

21 COURT REPORTER: Perfect. All righty. That
22 would be all for that I have. Thank you very much.

23 MR. COURTNEY: Thank you.

24 MS. CASTILLA: Okay. Thank you, guys. Bye.

25 (DEPOSITION CONCLUDED AT 4:33 P.M.)



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CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF ORANGE

I, the undersigned, certify that the witness in the foregoing transcript personally appeared before me and was duly sworn.

Identification: Produced Identification



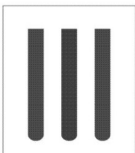
EVELYN POYATO

Court Reporter, Notary Public

State of Florida

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C E R T I F I C A T E

STATE OF FLORIDA)

COUNTY OF ORANGE)

I, EVELYN POYATO, Court Reporter and Notary Public
for the State of Florida at Large, do hereby certify
that I was authorized to and did report the foregoing
proceeding, and that said transcript is a true record of
the said proceeding.

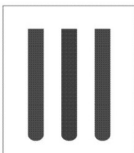
I FURTHER CERTIFY that I am not of counsel for,
related to, or employed by any of the parties or
attorneys involved herein, nor am I financially
interested in said action.

Submitted on: March 28, 2021.



EVELYN POYATO

Court Reporter, Notary Public



407.423.9900

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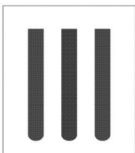
ERRATA

PAGE	LINE	CHANGE	REASON
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I have read the entire transcript of my deposition taken
in the captioned matter or the same has been read to
me. I request that the following changes be entered upon
the record for the reasons indicated. I have signed my
name to the Errata Sheet and authorize you to attach the
changes to the original transcript.

Date

NAME



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March 28, 2022

HANS GONZALEZ
hans.gonzalez@doralpd.com

RE: Deposition of **HANS GONZALEZ** taken on 3/3/2022
Victor Sepulveda v. City of Doral et al.

Dear ,

IMPORTANT NOTICE FOR DEPOSITION TRANSCRIPT READ AND SIGN

It is suggested that the review of this transcript be completed within 30 days of your receipt of this letter, as considered reasonable under Federal Rules*.

___ **Attorney - Copy of Transcript Enclosed:** Signature of the Deponent is required. Please have the deponent make any corrections/changes necessary on the Errata Sheet ONLY, sign name on the form where indicated. Please return ONLY the original signed Errata Sheet to our offices within 30 days from the date of this memorandum. If you have any questions, please call our offices.

___ **Attorney - No Copy Ordered:** Since you did not request a copy of the transcript, it will be necessary for the Deponent to call our offices to arrange for an appointment to read and sign the transcript of the Deposition within 30 days of this memorandum.

X **Deponent:** At the time of your deposition, you did not waive your right to read and sign the transcript of your testimony, therefore, attached please find a copy of the transcript and Errata Sheet. Please read the transcript, make any corrections necessary on the Errata Sheet ONLY, sign the bottom of the Errata Sheet, and return it within 30 days from the date of this memorandum. Please call our offices if you have any questions.

___ **Deponent:** At the time of your deposition, you did not waive your right to read and sign the transcript of your testimony, therefore, it is necessary for you to come to our offices to read and sign same. Please call Milestone Reporting Company to arrange for an appointment at your earliest convenience.

___ The attached executed copies of the Errata Sheet(s) are sent to you for your files. If you have any questions, please call our offices.

Thank you for your attention to this matter.

No. 207892

cc:

Waiver:

I, HANS GONZALEZ , hereby waive the reading and signing of my deposition transcript.

Deponent Signature

Date

*Federal Civil Procedure Rule 30 (e) / Florida Civil Procedure Rule 1.310 (e)