

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA**

STATE OF FLORIDA,  
Plaintiff,

CASE NO.: 2023-CF-2935

vs.

TOMASZ KOSOWSKI,  
Defendant.

\_\_\_\_\_/

**DEFENDANT'S MOTION TO AUTHORIZE ADDITIONAL  
FUNDING FOR A PRIVATE INVESTIGATOR**

Defendant, TOMASZ KOSOWSKI, by and through the undersigned attorney, hereby requests this Honorable Court enter an Order authorizing additional funding for the private investigator in the above style case and as ground therefore would show:

1. That the undersigned attorney has been appointed by this Court to represent the Defendant.
2. On July 7, 2025, this Court first entered an Order Granting Defendant's Motion to Incur Costs for Confidential Private Investigator authorizing a preliminary cap of \$2,500.00 at the hourly rate of \$50.00 per hour for investigator services
3. The undersigned counsel would also seek permission herein for the private investigator to exceed the previously established cap by 100 hours at the rate of \$50.00 per hour plus reimbursement for all reasonable and necessary related expenses, including but not limited to records expenses, travel expenses including lodging, meals, mileage, postage, shipping, and documentation reproduction, to be used in preparation for trial. Should additional time or funds be needed, counsel would further Motion the Court for prior approval.
4. The undersigned does not believe he can provide Mr. Kosowski with proper representation unless the Court approves the expenditure of funds to pay for the services of a qualified private investigator.
5. Mr. Kosowski respectfully submits that the denial of her request for funds would result in a violation of her rights to due process, equal protection, compulsory process, adequate representation, and to be free from cruel and/or unusual punishment, as guaranteed by the United States and Florida Constitutions.

WHEREFORE, the Defendant respectfully requests that this Court enter an Order authorizing the expenditure of an additional 100 hours at the statutory rate of \$50.00 per hour, certifying that said funds be paid by the State of Florida Justice Administrative Commission.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished electronically to the Justice Administrative Commission, on this 09<sup>th</sup> day of January 2026.

/s/ Daniel M. Hernandez  
DANIEL M. HERNANDEZ, ESQ.  
P.O. Box 173165  
Tampa, FL 33672-1165  
Florida Bar No.: 229733  
[info@danielmhernandezpa.com](mailto:info@danielmhernandezpa.com)



Amy Murillo-Rios &lt;amy@danielmhernandezpa.com&gt;

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**SOF v. Kosowski (23-cf- 2935)**

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**JAC Pleadings** <pleadings@justiceadmin.org>  
To: Amy Murillo-Rios <amy@danielmhernandezpa.com>

Mon, Jan 12, 2026 at 10:45 AM

Good morning,

JAC has received and reviewed the Defendant's Motion to Authorize Additional Funding for a Private Investigator as to the above-referenced matter. This is the second request for an investigator in this matter. JAC will not be filing a formal response and takes no position as to your motion. You may utilize this email in lieu of a formal response and should attach it to your motion when you provide it to the court.

**To be eligible for payment by JAC, private investigators must have an active Class C license issued by the Florida Department of Agriculture and Consumer Services and be employed by a private investigative firm with an active Class A license at the time the service is provided. See JAC's Due Process Contract, Paragraph II(15).**

Sincerely,

*Nyaira Brown*

Legal Assistant

Justice Administrative Commission

227 North Bronough Street, Suite 2100

Tallahassee, Florida 32301

Phone: (850) 488-2415

Website: [www.justiceadmin.org](http://www.justiceadmin.org)

*Please note: All email is potentially available as a public record. This email or any attachments provided may contain confidential information intended for the use of the designated recipients named above. Any inadvertent release of confidential or exempt information must be communicated to JAC immediately. If you are not the intended recipient and have received this email in error, please notify the sender immediately by returning the email and deleting the message and be aware that any review, dissemination, distribution of copying of this communication is strictly prohibited.*

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**From:** Amy Murillo-Rios <amy@danielmhernandezpa.com>  
**Sent:** Friday, January 9, 2026 11:39 AM  
**To:** JAC Pleadings <pleadings@justiceadmin.org>  
**Subject:** SOF v. Kosowski (23-cf- 2935)

[EXTERNAL]



AMY MURILLO-RIOS  
LEGAL ASSISTANT

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Kosowski, Tomasz - Motion to Authorize Additional Funding for an Investigator (Capital).pdf  
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