

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

23-02935-CF-D
522023CF002935000APC

STATE OF FLORIDA

v.

MURDER IN THE FIRST DEGREE

TOMASZ ROMAN KOSOWSKI
PID: 312109281

MOTION FOR JURY VIEW

BRUCE BARTLETT, State Attorney for the Sixth Judicial Circuit of Florida, files this State's Motion for Jury View of (a) the exterior of the property located at 1501 S. Belcher Road, Largo, PINELLAS COUNTY, Florida, and (b) the interior of Building "B" located at 1501-B S. Belcher Road, Largo, PINELLAS COUNTY, Florida, as grounds therefor would state:

1. The request is expressly authorized by Florida Statute Section 918.05 (2025) which states:

When a court determines that it is proper for the jury to view a place where the offense may have been committed or other material events may have occurred, it may order the jury to be conducted in a body to the place, in custody of a proper officer. The court shall admonish the officer that no person, including the officer, shall be allowed to communicate with the jury about any subject connected with the trial. The jury shall be returned to the courtroom in accordance with the directions of the court. The judge and defendant, unless the defendant absents himself or herself without permission of court, shall be present, and the prosecuting attorney and defense counsel may be present at the view.

2. Dr. Kosowski is charged with the First-Degree Murder of S.C. that occurred on March 21, 2023, at 1501-B S Belcher Road, Largo, PINELLAS COUNTY, Florida.
3. Dr. Kosowski was acting pro-se in a civil case where he was the Plaintiff and S.C. was one of the attorneys who represented parties Dr. Kosowski was suing. As a result, on January 26, 2023, Dr. Kosowski was present at 1501-B S. Belcher Road, Largo, Florida for a deposition related to the civil case. On that date, in the same bathroom where S.C. was later murdered by Dr. Kosowski, Dr. Kosowski confronted S.C. and called him a "scumbag," further stating he would win in the end.

4. Dr. Kosowski had visited 1501 S Belcher Road, Largo, Florida on multiple other occasions, all in which he had no lawful and/or justifiable reason to be there. On February 23, 2023, Dr. Kosowski traveled to 1501 S Belcher Road, Largo, Florida, and videotaped the cars in the parking lot, specifically in the parking lot closest to Building B. On March 14, 2023, Defendant again traveled to the location and entered Building B where he hid in a storage closet in the shared hallway of 1501-B S Belcher Road, Largo, Florida. On March 17, 2023, Dr. Kosowski's iPhone Wi-Fi connected at the Blanchard Law Firm, located at 1501-B S Belcher Road, Largo, Florida. Lastly, Dr. Kosowski traveled to 1501-B S Belcher Road, Largo, Florida on March 21, 2023, where he killed S.C. in the shared men's bathroom. Needless to say, Dr. Kosowski had thoroughly familiarized himself with the location where he murdered S.C.
5. After his diligent efforts to scope out the location, he was ultimately able to successfully murder S.C. in a shared men's restroom in a public office building on a Tuesday morning between the hours of 9:50am-10:22am while other employees were in the building. The bathroom was later forensically processed and analyzed. It was determined there had been a bloodletting event that occurred in the men's bathroom, and it was in fact S.C.'s blood located on various surfaces including the floor, divider, stained paper towels, napkins, and the drain. It should also be noted that a mixture of Dr. Kosowski's DNA and S.C.'s blood was located on the exterior of the men's bathroom door.
6. Dr. Kosowski was then able exit the office building with S.C.'s body in a wagon, make an approximate 30-minute phone call, all while connecting to a phone tower that looms over the parking lot. After he ended the call and powered off his phone, he then loaded the wagon containing S.C.'s body into the bed of his truck and exited the parking lot without being immediately stopped.
7. The layout of Building B is extremely fragmented and disjointed, with a great deal of hiding places, to which Dr. Kosowski familiarized himself with. Further, during this time frame, there were many vacant offices within Building B.
8. Although there are videos and photographs available, these videos and photographs do not allow the proper perception and perspective needed by the trier of facts in this case. Because of the nature of the offenses, it is critical and essential that the jurors view 1501 S Belcher Road South, Largo, Florida, in assisting their analysis and applying the evidence presented at trial.
9. A view by the jury of these locations will aid the jury in analyzing and applying the evidence. *Thomas v. State* 748 So.2d 970, 983 (Fla. 1962) (The purpose of a jury view is to assist the jury

in analyzing and applying the evidence presented at trial. id. A motion for a jury view may be granted if it appears that a useful purpose would be served. See *Ferguson v. State*, 28 So.2d 427, 430 (Fla. 1946). Such a determination is left to the discretion of the trial judge and there is presumption of correctness as to his rulings absent a demonstration to the contrary. *Thomas v. State*, 748 So.2d 970, 983 (Fla. 1999).

10. Of course, Dr. Kosowski, his counsel, this Court and the State will be present at the jury view. Fla. Stat. 918.05; Fla.R.Crim.Pro. 3.180(a)(7). The State will contact parties to arrange for the transportation of the jury, Dr. Kosowski, lawyers, and this Court to the area(s) of the jury view.

WHEREFORE, the State of Florida moves this Honorable Court to grant the State's Motion for Jury View.

I HEREBY CERTIFY that a copy of the above has been furnished to Pro Se Defendant TOMASZ ROMAN KOSOWSKI, by personal service in court on the 31st day of August, 2026.

BRUCE BARTLETT, State Attorney
Sixth Judicial Circuit of Florida

By: /s/ Nathan Vonderheide
Assistant State Attorney
Bar No. 22106
eservice@flsa6.gov
P.O. Box 17500
Clearwater, Florida 33762-0500
(727) 464-6221