

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA  
CASE NO. 2023-CF-2935

STATE OF FLORIDA,

v.

TOMASZ KOSOWSKI,

Defendant,

---

TAKEN BY: TOMASZ KOSOWSKI

DEPOSITION OF: DANA ZUCHETTO

DATE: August 28, 2026

TIME: 9:01 a.m. - 9:36 a.m.

PLACE: ZOOM VIDEOCONFERENCE

REPORTED BY: CHARLENE M. EANNEL, RPR  
State of Florida, Notary Public

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10 TOMASZ KOSOWSKI - PRO SE DEFENDANT  
11  
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525-page Report

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**DANA ZUCHETTO,**

HAVING BEEN DULY SWORN ON OATH, WAS EXAMINED AND  
TESTIFIED AS FOLLOWS:

DIRECT EXAMINATION

BY DR. KOSOWSKI:

Q. Good morning, Ms. Zuchetto.

A. Good morning.

Q. My name is Tom Kosowski. I'm the defendant in  
this case. I wanted to personally thank you for coming  
out and doing this again today. I know you've taken a  
deposition in this case before about a year and a half  
ago, and I thank you for your time. I really appreciate  
it.

A. Certainly.

Q. Today, I wanted to ask you a couple of questions  
as it relates to a very specific matter, but the first  
thing I think we should do is could you just, for the  
record, could you spell your name for me.

A. My last name is Z, as in "Zebra," U-C-H-E-T-T-O.  
First name Dana, D-A-N-A.

Q. Okay. And you authored one supplement in this  
case; is that correct?

A. Yes.

Q. And that supplement is Number 13, correct?

A. Correct.

1 Q. And is this supplement, have you had a chance to  
2 review it prior to today's deposition?

3 A. Yes.

4 Q. And is it complete and accurate?

5 A. To the best of my knowledge, yes.

6 Q. And did you review the ACISS report for today's  
7 deposition?

8 A. That is my supplement is the ACISS report.

9 Q. That ACISS report?

10 A. Yeah.

11 Q. Okay. Very good.

12 How else did you prepare for today's deposition?

13 A. I looked over the photos and I read my  
14 deposition.

15 Q. Did you prepare with anybody else?

16 A. No.

17 Q. No. All right.

18 So I would like to begin with just kind of a  
19 general question for my understanding. On the beginning  
20 of the supplements in the very top box, it gives your name  
21 as the reporting law enforcement officer, and then it  
22 gives the backup law enforcement officer. There's a  
23 report status and there's a date next to that report  
24 status.

25 Can you tell me what that is?

1 A. On the report it says April 7th, 2023.

2 Q. Mrs. Zuchetto, I'm sorry. You really cut out  
3 really bad at that time.

4 Would you mind repeating your answer?

5 A. April 7th, 2023.

6 Q. All right. And what does that indicate?

7 A. That is when the supervisor (audio  
8 interruption.)

9 THE COURT REPORTER: Ma'am, your audio is  
10 terrible.

11 THE WITNESS: I have my volume all the way up.

12 THE COURT REPORTER: It's not the volume.  
13 You're cutting out.

14 THE WITNESS: I'm using my agency laptop.

15 THE COURT REPORTER: That sounds good.

16 MR. VONDERHEIDE: It's good now.

17 BY DR. KOSOWSKI:

18 Q. Would you mind repeating your last answer?

19 A. Oh, why -- what that date represents?

20 Q. Yes.

21 A. That's when a supervisor reviews my report and  
22 approves it.

23 Q. Okay. Do you remember when you actually  
24 authored this report, what date?

25 A. I don't know the exact date and time. It looks

1 like I began the report at -- I built my cover page on  
2 March 24th, 2023, at 0651, and then I don't know from  
3 there what exact date and time I've completed it.

4 Q. Very good.

5 With regards to the scene, and when I say "the  
6 scene," I mean 511 Seaview Drive in Tarpon Springs, can  
7 you tell me what time did you arrive at that scene on the  
8 night of March 23rd?

9 A. 2255.

10 Q. And what time did you leave the scene?

11 A. I don't have a (audio interruption.)

12 Q. I'm sorry, ma'am. You cut out again. Could you  
13 repeat your entire answer?

14 A. I don't have my notebook. I just have my  
15 report. Without looking at the CAD records, I believe it  
16 was around 6:00 a.m.

17 Q. 6:00 a.m.

18 And where did you go after 6:00 a.m.?

19 A. From the time I left that location, I went back  
20 to my office at the Forensic Sciences Section in  
21 Clearwater, Florida.

22 Q. You eluded to, in your supplement, that you went  
23 to Property and Evidence afterwards as well to, I believe,  
24 deposit your specimens and the evidence in this case into  
25 a locker.

1           Is that accurate?

2           A.   No.  I said I returned to the Forensic Sciences  
3 Division.  I packaged the items that I collected and I  
4 secured them into a locker, which (audio interruption) --

5           THE COURT REPORTER:  Ma'am, you're cutting out.  
6 I can't understand what you're saying.

7           THE WITNESS:  I don't know what to do with this.

8           I returned to the Forensic Sciences Division,  
9 packaged the evidence, and secured it into a locker.  
10 Property and Evidence then comes and picks that up.

11          DR. KOSOWSKI:  I'm sorry, Charlene.  Were you  
12 able to get that?

13          THE COURT REPORTER:  Yes, sir.

14 BY DR. KOSOWSKI:

15          Q.   Okay.  Just for my sake, for my ears, you went  
16 to Property and Evidence.  You sealed the evidence in a  
17 bag and they came to you and picked it up; is that  
18 correct?

19          A.   We (audio interruption) -- building --

20          THE COURT REPORTER:  I can't hear her.

21          THE WITNESS:  I don't know what else to do.  I  
22 can't -- I'm sorry.

23          DR. KOSOWSKI:  This is kind of getting unusable  
24 right now.

25          THE WITNESS:  I don't know what to do.  I'm

1           doing the best that I can.

2           DR. KOSOWSKI: I understand.

3           THE COURT REPORTER: Just keeps going in and  
4           out.

5           THE WITNESS: I don't know why. I'm using my  
6           work laptop.

7 BY DR. KOSOWSKI:

8           Q. Okay. Let's move on.

9           With regards to the gray Toyota Tundra that you  
10          eluded to in your supplement, did you know who called for  
11          the tow truck?

12          A. I do not.

13          Q. Do you know the time of arrival of the wrecker?

14          A. I do not.

15          Q. I'm sorry. One more time, ma'am?

16          A. No, I don't.

17          Q. Do you know the time of the departure of the  
18          wrecker?

19          A. I do not, no.

20          Q. Did you see the Tundra being loaded onto the  
21          wrecker?

22          A. I don't recall.

23          Q. You don't recall? So --

24          A. Once I did the evidence tape seals, that ended  
25          my -- that ended my involvement with the truck at all.

1 Q. All right. So you did not see -- you cannot  
2 comment on whether the Tundra was driven out of the garage  
3 prior to being loaded onto the wrecker?

4 A. The doors were sealed with evidence tape. So if  
5 they were still sealed when they began to process it at  
6 our building, then, no, it wouldn't have been entered.

7 Q. I see.

8 A. I sealed all the doors with evidence tape and my  
9 initials.

10 Q. Did you make sure the Tundra was locked prior to  
11 transport?

12 A. I did not. I just -- the doors were closed. I  
13 sealed them with evidence tape.

14 Q. So you don't know whether the Tundra was  
15 transported with locked doors and a lock --

16 A. I do not.

17 Q. Where were the keys to the Tundra?

18 A. I'm not aware of the keys.

19 Q. And you already said that you did not see the  
20 wrecker leave yourself, correct?

21 A. I don't recall.

22 Q. Okay. Did you witness any law enforcement agent  
23 follow the wrecker as it left?

24 A. My lieutenant was on scene and he left. He was  
25 the one that was following it back.

1 Q. How do you know that?

2 A. I was made aware of that. I was told he would  
3 be following it back.

4 Q. But you did not witness this yourself?

5 A. Personally, I don't recall seeing -- I saw him  
6 on scene, but I don't recall seeing him leave with it.

7 Q. Okay.

8 A. Or following the truck.

9 Q. And who told you that Lieutenant Gross followed  
10 the --

11 A. I don't recall. I was told to seal the vehicle  
12 and it was being towed back, and Lieutenant Gross was  
13 following it, but that's all. I was just told that. I  
14 don't remember who exactly said it.

15 Q. In your supplement on page 3 you said, open  
16 quotes, I built the property label for the vehicle in  
17 ACISS to maintain chain of custody of the vehicle, close  
18 quote.

19 How does the ACISS report maintain the chain of  
20 custody?

21 A. Because each step of the way when the --  
22 somebody takes the vehicle, every item of property, so to  
23 speak, has to be built, and somebody would intake it at  
24 the building when it arrives and then once it's processed,  
25 then it's released.

1 Q. Okay.

2 A. It's just -- it's documented with ACISS.  
3 Everybody documents, like -- like, the person who received  
4 the vehicle and processed it would -- in their report,  
5 would reflect that they, you know, unsealed the vehicle  
6 and they would photograph the evidence tape seals prior to  
7 opening it. Then they would open and process the vehicle  
8 and that would be documented in their report.

9 Q. So just to check my understanding, the ACISS  
10 report should show A to B to B to C in terms of the  
11 transfer of a piece of evidence; is that correct?

12 A. With vehicles, it's difficult. I was at the  
13 scene and I built the label on the computer and then  
14 someone picked up that label and then it was put with the  
15 paperwork for the vehicle. So I don't know the exact --  
16 I've never released a vehicle myself, so I don't know  
17 exactly what goes into that part of it, but each person  
18 who does something authors a report as far as, you know,  
19 the person who processed it would document them unlocking,  
20 opening the vehicle, and it would all be in their report.

21 Q. Okay. If Lieutenant Gross was tasked with  
22 following the Tundra, as you've said, to the FSD garage,  
23 should his name appear in the ACISS report?

24 A. I don't know. You would have to ask him.

25 Q. Okay. If his name would not appear in the ACISS

1 report, how would we know that if he actually followed the  
2 truck?

3 A. You would have to speak to him. I'm just -- I  
4 can only author in my report what I was told and what I  
5 did. Once that vehicle -- once I sealed the evidence tape  
6 seals on that vehicle, I had no more involvement in it.  
7 So I don't know anything beyond that point.

8 Q. I understand.

9 Can we together go over the ACISS report?

10 A. Sure.

11 DR. KOSOWSKI: All right. Mr. Vonderheide,  
12 would you be able to share the ACISS report on the  
13 screen?

14 MR. VONDERHEIDE: Sure. Yes.

15 Which one would you like?

16 DR. KOSOWSKI: The one that Jane sent around.  
17 The one that was 525 pages.

18 MR. VONDERHEIDE: The Property Report? Okay.  
19 I've got you.

20 DR. KOSOWSKI: Charlene, this will be Exhibit A,  
21 if we may incorporate it?

22 THE COURT REPORTER: Sure.

23 (Exhibit A was marked.)

24 MR. VONDERHEIDE: Charlene, I will e-mail it to  
25 you at the end.

1 THE COURT REPORTER: Okay.

2 MR. VONDERHEIDE: So what page do you want?

3 DR. KOSOWSKI: I would like to go to page 482,  
4 please.

5 MR. VONDERHEIDE: You've got it.

6 Can you all see it?

7 THE WITNESS: Yes.

8 MR. VONDERHEIDE: Doctor, can you see it?  
9 Dr. Kosowski?

10 DR. KOSOWSKI: Yes. Would you mind scrolling  
11 down until we see property Item Number 141? There it  
12 is right in the middle of the screen.

13 BY DR. KOSOWSKI:

14 Q. Mrs. Zuchetto, are you able to see that?

15 A. Yes, I am.

16 Q. Wonderful.

17 So I went through the ACISS report and I have  
18 four entries for Item Number 141, which appears on the  
19 screen right now. These are the first four entries in a  
20 time sequence for that item. 141 was indicated that it  
21 was the Tundra itself.

22 Do you understand?

23 A. Oh, okay. I can't see that on here, but...

24 Q. Well, would you like me to verify that 141 is  
25 the Tundra for you?

1           A.    I mean, I built it.  It doesn't surprise me that  
2 it would be there.

3           Q.    Okay.

4           A.    I just can't see on this report what item number  
5 it was.

6           Q.    So do you see where it says LA23-2583.141?

7           A.    Yes.

8           Q.    Okay.  So that is the indication that that is  
9 the Tundra truck.

10          A.    Okay.

11          Q.    Do you agree?

12          A.    I mean, it doesn't tell me what the item is.  I  
13 see the number, but it doesn't tell me it's the Tundra.

14          Q.    Okay.

15          A.    I would have to take your word for it on that.  
16 I can't see that.

17          Q.    So let's, perhaps, verify that 141 is the  
18 Tundra.

19                DR. KOSOWSKI:  Mr. Vonderheide, would you mind  
20 going to the beginning of the report?

21                MR. VONDERHEIDE:  Sure.

22                DR. KOSOWSKI:  Perhaps maybe searching for the  
23 first 141.  There it is.  It is sequentially listed  
24 right where you're going down.  There.

25                THE WITNESS:  Yes, I do see that.  Yes.

1 BY DR. KOSOWSKI:

2 Q. Do you see that?

3 A. Yes.

4 Q. And you see it says, Property Class, Evidence  
5 felony suspect vehicle from search warrant scene, dark  
6 gray Toyota Tundra with Tag 70ANQU?

7 A. I do see that.

8 Q. Okay. So is there any confusion on your part  
9 that --

10 A. No. Yeah. I --

11 Q. -- 141 is the Tundra?

12 A. Yes, it's the Tundra.

13 DR. KOSOWSKI: Okay. So can we just go back to  
14 page 482, please?

15 BY DR. KOSOWSKI:

16 Q. Okay. So it seems that this is the first entry  
17 with that Tundra, and it looks like it occurred at 3:27  
18 a.m. on the 24th of March, 2023. And then on the very  
19 right-hand side it says, From no one. And then it says,  
20 To Zuchetto, which is you.

21 Can you explain what this entry in ACISS means?

22 A. This means I built this item in ACISS. I built  
23 the item from the scene in ACISS.

24 Q. I don't understand "built." What do you mean by  
25 "built"?

1           A.    I built it in the system. I went into the  
2 computer, into the ACISS Property Report, and then I made  
3 an -- I made that item as the truck.

4           Q.    Okay. Now --

5           A.    I built the property label for it. It would  
6 have printed either at the -- well, usually, it prints at  
7 our office building.

8           Q.    Okay. And this is kind of like a sticky label  
9 or something that you put on the truck?

10          A.    It does -- it has -- yeah, it's an adhesive  
11 label. It can be stuck to something or it can be -- it  
12 usually goes on the clipboard. We have a clipboard for  
13 the garage and there's, like, where you can put more  
14 vehicle information.

15                So the person who processed it would have taken  
16 the label and stuck it to the sheet on the clipboard.

17          Q.    Okay. Does this mean you're taking possession  
18 of the truck?

19          A.    I just built it in the system so that it would  
20 be logged into the system. It was then transported to the  
21 garage and another person took custody of it there. And  
22 that person --

23          Q.    Is -- I'm sorry for interrupting. Please  
24 continue.

25          A.    All I did was built it to put it into the

1 system. I never had any involvement beyond -- once I  
2 sealed that, the doors on it at the location on Seaview.  
3 Once I sealed those doors, I built the item into the  
4 system, the vehicle, and that was the end of my  
5 involvement in it.

6 Q. Okay. Are you in custody of the truck right  
7 now?

8 A. No, I'm not.

9 Q. Who is?

10 A. I don't know. You would have to -- the Property  
11 Report would reflect where it should be now.

12 Q. You're saying this Property Report should  
13 reflect where it -- who is in custody of it?

14 A. If it was released or whatever happened to the  
15 vehicle after it was processed. I have not seen the  
16 vehicle since it left the location on Seaview since before  
17 then. When I sealed the doors and the -- like, the doors  
18 and the hood and the back cover, once I sealed all of that  
19 and built it into the system, that was the end of my  
20 involvement. I have no idea where the vehicle is now.

21 Q. So the vehicle is gone, at this point, by --

22 A. I don't know. I don't know. You would have to  
23 check with -- the system which should show where it went  
24 to, but my involvement ended and I never followed anything  
25 further on it because that was the end of my involvement

1 with that vehicle.

2 Q. Mrs. Zuchetto, did you make this entry before or  
3 after the Toyota Tundra left the scene?

4 A. I imagine it was done before, but I don't know  
5 exactly what time the Tundra left the scene.

6 Q. Okay. And you're saying you're not in custody  
7 of the vehicle at this point?

8 A. I am not personally, no.

9 Q. Who was the first person that took custody of  
10 the vehicle?

11 A. I don't know. We would have to look through the  
12 reports.

13 Q. And which reports are those, ma'am?

14 A. Any of the ACISS reports. There should be a  
15 trail as to who processed the vehicle. I believe it was  
16 Kristen Stropes, but that's the best that I can remember,  
17 but I don't know for sure without checking in the system.

18 Q. Okay. So you think that Kristen Stropes would  
19 be the first person to take possession?

20 A. Possibly. I don't know. All I can tell you is  
21 that it left the house. After it was sealed up, it left  
22 that scene and that was the end of my involvement. I had  
23 no further involvement with it. So I don't know who took  
24 it next. I don't know any of the results of any further  
25 processing. I had no more involvement in it.

1 Q. I understand.

2 One more thing. Why does this not say from  
3 Zuchetto to Lieutenant Gross?

4 A. I don't know. I don't have any involvement in  
5 the system itself other than building it.

6 Q. You have no control over the "from" and "to"  
7 boxes on there?

8 A. I don't know what the system -- it's just the  
9 way the program is.

10 Q. Okay.

11 A. I don't -- I just -- I do -- what we do is we  
12 build item in the property -- into the property report,  
13 and then once it left the bay -- or it left the garage  
14 there at the house, I had -- or, actually, after I sealed  
15 it, for that matter, I never had any further involvement  
16 in it.

17 How ACISS works is just the system. I don't  
18 know why it shows "to" but not "from." I don't know why  
19 the program does that.

20 Q. Okay. Let's move onto the next one.

21 DR. KOSOWSKI: Mr. Vonderheide, would you mind  
22 going to page 479 for me? And let's find Item Number  
23 141. There we go.

24 BY DR. KOSOWSKI:

25 Q. So this is the next entry for Item 141, the

1 Tundra. Do you see it in the middle of the screen there?

2 A. Yes.

3 Q. All right. And it occurred on 4:48 a.m. on  
4 3/24. And on the right-hand side it says, again, from no  
5 one. Then to Zuchetto, yourself, but it also adds at the  
6 bottom Bin: VPG, and then FSD vehicle processing garage.

7 Could you explain what's going on here?

8 A. I believe this is the -- it's being -- so the  
9 vehicle processing garage, that is where we process  
10 vehicles.

11 Q. But what does this entry indicate?

12 A. I'm not sure. I wasn't there. I had -- it  
13 would have had my name because I built the item. I'm  
14 trying to see. I don't know. I'm not entirely sure the  
15 extent of the -- of how this program works, the ACISS  
16 program works.

17 Q. Okay.

18 A. But it's showing it was moved from where I built  
19 it to -- into the vehicle processing garage.

20 Q. Does this entry mean that the vehicle was at the  
21 vehicle processing garage at 4:48 a.m.?

22 A. I'm not exactly sure because it has all of my  
23 items showing at the -- well, at either FSD or at the  
24 garage. The other items I built are showing at FSD.

25 Q. I see.

1           Is this incorrect?

2           A.    I don't know what -- I don't understand the  
3 mechanics of the actual program. I would have to confirm  
4 with Property and Evidence.

5           Q.    Okay. But you are not actually yourself  
6 physically at the FSD vehicle processing garage?

7           A.    No, I was not.

8           Q.    Who was in possession of the truck at this  
9 point?

10          A.    I don't know. I wasn't at the garage.

11          Q.    Okay. And --

12          A.    It has my name on it because I built the item.  
13 Then once it's transferred into a new location, it keeps  
14 my name on it until it's out of my -- you know, it would  
15 transfer out. Whoever took the vehicle in, it should be  
16 into their custody.

17          Q.    I understand.

18                And just one last question with regards to this  
19 specific item. Why doesn't it say from Zuchetto to Gross  
20 at this point?

21          A.    I just built the item in the system. I don't  
22 know why it's in there like that.

23                DR. KOSOWSKI: Okay. Mr. Vonderheide, let's  
24 move on to the next one. Could you go to page 461,  
25 please?

1 BY DR. KOSOWSKI:

2 Q. Do you see Item 141 in the middle of the screen  
3 there, ma'am?

4 A. I do.

5 Q. Wonderful.

6 Just for the record, I'm reading in that the  
7 next entry for the Tundra is on 5:52 a.m., on 3/24/23, and  
8 it says from Zuchetto to Stropes.

9 Mrs. Zuchetto, what is going on here?

10 A. That would probably be when Stropes took custody  
11 of the vehicle.

12 Q. Okay. And who did Stropes take custody of the  
13 vehicle from?

14 A. I don't know. I was not there. It was probably  
15 locked in the building in our vehicle processing garage.  
16 It's a secured building.

17 Q. Uh-huh?

18 A. And that might be what time she arrived and  
19 began to took custody of it to begin processing, but you  
20 would have to check with her report as to what her times  
21 are.

22 Q. So just for clarification, the truck gets towed  
23 to the vehicle processing garage. It gets dropped off at  
24 the garage, and this would indicate when Stropes would  
25 come in and take possession of the vehicle?

1           A.    You would have to confirm with her report times,  
2 but that's -- to my knowledge, that's what that would  
3 mean. That's when she arrived and took custody of it at  
4 the garage.

5           Q.    Very good.

6                   And why does this not say Gross to Stropes,  
7 then?

8           A.    I'm not aware. I don't know how this -- I don't  
9 know if he didn't author a report, I don't know.

10          Q.    But it's still your testimony that you never had  
11 possession of the truck yourself?

12          A.    From the time I sealed the evidence tape seals,  
13 that was the end of my involvement with the vehicle, yes.

14          Q.    Understood.

15                  DR. KOSOWSKI: Mr. Vonderheide, can we please go  
16 to page 413?

17 BY DR. KOSOWSKI:

18          Q.    Mrs. Zuchetto, do you see Item 141 in the middle  
19 of the screen?

20          A.    I do.

21          Q.    And I'll just read in that the next entry for  
22 the Toyota Tundra truck was at 1:28 p.m. now several hours  
23 after the last entry on 3/24/23. And it says: From  
24 Zuchetto to -- from Zuchetto at the FSD vehicle processing  
25 garage to Klein.

1 Mrs. Zuchetto, what's going on here?

2 A. It looks like Klein was doing some kind of  
3 processing with it.

4 Q. Okay.

5 A. I'm only on there because I'm the original  
6 person who built the item. I did not have custody of it  
7 up until that time, but I was the one that built it in the  
8 system in the first place.

9 Q. I understand. Now, I'm not trying to be -- I'm  
10 not trying to frustrate you. I'm just trying to be  
11 complete about this. That's all. I understand that the  
12 system puts your name in places that appear that you  
13 weren't there because you've already testified that you  
14 were not at the vehicle processing garage, correct?

15 A. Correct, but I did build the item in the first  
16 place. I was the first one to enter that vehicle into the  
17 system.

18 Q. Okay. Who is in possession of the vehicle here?

19 A. According to this, Assistant Supervisor Klein at  
20 this time did some kind of processing with the vehicle.

21 Q. And do you know why it says -- or why it doesn't  
22 say Stropes to Klein in this instance?

23 A. I don't know. I don't know why the report does  
24 that.

25 Q. Okay. You weren't at the FSD garage anywhere

1 from 4:48 a.m. to 1:28 p.m., correct?

2 A. I was not.

3 Q. Were you at home at that point?

4 A. Possibly. I don't recall.

5 Q. When you left the scene and went back into the  
6 office, did you go home afterward?

7 A. I don't recall where I went afterwards. I mean,  
8 after I completed my shift, I probably went home, but I  
9 don't know.

10 Q. Okay.

11 DR. KOSOWSKI: Mr. Vonderheide, thank you. We  
12 won't need that exhibit any further.

13 BY DR. KOSOWSKI:

14 Q. And I just want to make perfectly clear, in  
15 those four reports that we just looked at, those four  
16 ACISS entries, there was no mention of Lieutenant Gross's  
17 name anywhere --

18 A. I did not see it there, no.

19 Q. It seems to me like the chain of custody is kind  
20 of a mess in the ACISS report for these first four  
21 entries.

22 Would you happen to agree?

23 A. I don't know how the system completely works.

24 Q. You did mention in your supplement that the  
25 ACISS report was supposed to help -- or rather make clear

1 the chain of custody of the Tundra; is that correct?

2 A. Yes.

3 Q. Let's move on and let me ask you: How did the  
4 plan to tow the Tundra truck for further processing  
5 materialize?

6 A. I was just told that they were going to take it  
7 back and process it at our vehicle processing garage.

8 Q. Who told you that?

9 A. I don't recall. That was probably one of the  
10 detectives and the supervisors discussed it.

11 Q. Okay. Was it one of your own PCSO family?

12 A. I don't know. I don't know who made that  
13 decision.

14 Q. Okay. How many people were involved in this  
15 plan; do you remember?

16 A. I don't recall. There were a lot of people on  
17 scene.

18 Q. Okay. How was it decided that Lieutenant Gross  
19 was going to follow the truck?

20 A. You would have to ask him.

21 Q. And you don't know who decided this?

22 A. I do not. I don't recall. I was just advised  
23 they were going to process it back at the vehicle  
24 processing garage, and I was asked to then seal the  
25 vehicle for it to be transported.

1           Q.    Why was it necessary to have Lieutenant Gross  
2 follow the truck?

3           A.    That's pretty standard when someone -- my camera  
4 cut out. I don't know what's going on. Oh, there it is.

5                    When -- I'm sorry. Say that again. Repeat the  
6 question?

7           Q.    My question is: Why was it necessary to have  
8 Lieutenant Gross follow the truck?

9           A.    That's correct. Our standard procedure for  
10 towing a vehicle -- when a vehicle is towed back to our  
11 building, it is generally escorted by usually a member  
12 from the Forensic Sciences Section.

13          Q.    For what reason?

14          A.    Just to maintain chain of custody. We see it,  
15 then they seal it into the -- it gets put into our garage,  
16 which is a locked facility.

17          Q.    What are the implications if no one followed the  
18 truck?

19          A.    I don't know. It's -- every vehicle that  
20 I've -- I mean, I've escorted multiple vehicles back there  
21 myself. It's just that's our standard operating  
22 procedure.

23          Q.    Understood.

24          A.    There are logs into the -- there are logbooks.  
25 Any time somebody enters into the garage, our proximity

1 cards we have to use that to enter that garage. As well  
2 as whoever goes there has to write on a log who is  
3 bringing the vehicle in. It should also be on the sheet  
4 that was on the clipboard.

5 Q. Do you have access to that log?

6 A. I do not currently, no.

7 Q. Okay. How --

8 A. I don't know -- it would be -- you would have to  
9 check with someone at the -- one of the supervisors at the  
10 Forensic Sciences Division as to where they store that  
11 information.

12 Q. Okay. You took photos of the residence that  
13 night with a regular SLR-type camera, correct?

14 A. I took some, yes.

15 Q. This is in addition to OSCR360 photos?

16 A. Correct.

17 Q. Okay. In your report, you note that Specialist  
18 Webster took photos of the residence prior to?

19 A. Yes. She did all of the overall photos prior to  
20 any of the close-up photos.

21 Q. Did you use the same camera as Specialist  
22 Webster to take your photos, or were there multiple  
23 cameras being used that night?

24 A. No. Each specialist has their own digital  
25 camera assigned to them.

1 Q. Very good. Just a couple more questions, ma'am.  
2 What is the complete address of the FSD  
3 processing garage?

4 A. Let me see if I have it here. It's -- I don't  
5 know it off the top of my head.

6 THE COURT REPORTER: You're cutting out, ma'am.

7 THE WITNESS: I don't know it off the top of my  
8 head. I don't have it in my report because I didn't  
9 go to that location.

10 MR. VONDERHEIDE: We can't hear you.

11 BY DR. KOSOWSKI:

12 Q. Mrs. Zuchetto, I'm sorry. You cut out again.

13 Would you mind repeating your answer for me?

14 A. I don't know the address off the top of my head.  
15 It's a vehicle processing garage. It's Unit Number 10 on  
16 49th Street, but I can't remember the exact address.

17 Q. Okay. Who owns or leases this garage?

18 A. The Pinellas County Sheriff's Office leases the  
19 bays that we use, I believe.

20 Q. Does Largo Police Department conduct operations  
21 at this address?

22 A. The cases that we are involved with them, they  
23 are there sometimes.

24 Q. No, but do -- does the police department have  
25 housed agents there, for example, or take phone calls

1 there, for example?

2 A. I'm not aware.

3 DR. KOSOWSKI: Mrs. Zuchetto, thank you very  
4 much for taking the time to answer my questions this  
5 morning. I wish you a good day. God bless you.

6 THE COURT: Thank you.

7 (Deposition concluded at 9:36 a.m., and reading  
8 was reserved by the witness.)

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## CERTIFICATE OF OATH

STATE OF FLORIDA )

COUNTY OF PINELLAS )

I, the undersigned authority, certify that  
DANA ZUCHETTO appeared before me via Zoom  
Videoconferencing on the 28th day of August, 2026, and  
was duly sworn.

WITNESS my hand and official seal this 28th day  
of August, 2026.

---

CHARLENE M. EANNEL, RPR  
Stenographic Court Reporter  
Notary Public  
State of Florida at large  
My Commission # HH 823102  
Expires August 18, 2030

## REPORTER'S DEPOSITION CERTIFICATE

STATE OF FLORIDA )

COUNTY OF PINELLAS )

I, CHARLENE M. EANNEL, RPR, Stenographic Court Reporter, certify that I was authorized to and did stenographically report the deposition of DANA ZUCHETTO; that a review of the transcript WAS requested; and that the transcript, pages 1 through 31, is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 9TH day of SEPTEMBER, 2026.

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CHARLENE M. EANNEL, RPR

## ERRATA SHEET

WITNESS: DANA ZUCHETTO

CASE: STATE OF FLORIDA VS. TOMASZ KOSOWSKI

CASE NO: 2023-CF-2935

DATE: August 28, 2026

After you have read your transcript, please note any errors in transcription on this page. Do not mark on the transcript itself. Please sign and date this sheet as indicated below. If additional lines are required for corrections, attach additional sheets. If no corrections, please indicate "None."

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Under penalties of perjury, I declare that I have read the foregoing transcript, and I subscribe to its accuracy, to include the corrections or amendments noted above or hereto attached.

DANA ZUCHETTO

DATE

## SIGNATURE SHEET

CASE NO: 2023-CF-2935

STATE OF FLORIDA,,

VS.

TOMASZ KOSOWSKI,

DEFENDANT.

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I, DANA ZUCHETTO, declare that I have read the foregoing pages of my deposition taken in the above-captioned matter, and except for the corrections or amendments indicated on the Errata Sheet attached for such purposes, I hereby subscribe to the accuracy of this transcript.

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DANA ZUCHETTO

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DATE