

1 IN THE CIRCUIT COURT, SIXTH JUDICIAL CIRCUIT,
2 IN AND FOR PINELLAS COUNTY, FLORIDA
3 CASE NUMBER: 2023-CF-2935

4 STATE OF FLORIDA,

5
6 vs.

7 TOMASZ KOSOWSKI,

8
9 Defendant.

10

11

12 DEPOSITION OF OFFICER MARIO REYES
13 (Appearing Remotely Via Zoom Videoconference)

13

14 DATE: Friday, August 28, 2026

15 TIME: 10:58 a.m. until 11:12 a.m.

16 PLACE: (All Participants Appeared Remotely)

17 STENOGRAPHICALLY
18 REPORTED

19 REMOTELY BY: LISA L. TAYLOR, RPR, FPR-C,
20 Registered Professional Reporter,
21 Florida Professional Reporter-Certified
22 Court Reporter and Notary Public

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1 APPEARANCES:

2

3 NATHAN T. VONDERHEIDE, ESQUIRE (Via Zoom)

4 **ALEXANDRA G. SPADARO, ESQUIRE (Via Zoom)**

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10 On Behalf of the State of Florida

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1 I N D E X

2 TESTIMONY OF OFFICER MARIO REYES

3 Direct Examination By Mr. Kosowski 4

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9 INDEX OF EXHIBITS

10 MARKED BY THE DEFENDANT:

11 Exhibit C 12
(Vehicle Tow and Storage Receipt)

12

13

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16 STIPULATION

17 It is hereby stipulated and agreed by and between

18 counsel present at this deposition and by the deponent

19 that the witness review of this deposition would be

20 reserved.

21

22

23 (This transcript is the product of the court
reporter and should not be reproduced and given free of
24 charge to any party unless under the direction, control
and/or supervision of the certifying court reporter.)

25

1 (Whereupon, the witness was sworn in by the
2 court reporter.)

3 WHEREUPON,

4 OFFICER MARIO REYES,

5 having first been duly sworn, was called as

6 a witness and testified as follows:

7 DIRECT EXAMINATION

8 BY MR. KOSOWSKI:

9 Q Mr. Reyes -- Deputy Reyes?

10:58:01 10 A Yes, sir.

11 Q Good afternoon. My name is Tom Kosowski. I'm
12 the defendant in this case.

13 A Yes, sir.

14 Q Thank you so much for being here. I really
10:58:07 15 appreciate your time. This should be a really short
16 deposition. Okay?

17 A All right.

18 Q All right. For the record, would you mind
19 spelling your name and --

10:58:14 20 A First name is Mario, M-A-R-I-O. Last name
21 Reyes, R-E-Y-E-S.

22 Q And how are you employed?

23 A I'm a police officer with the Tarpon Springs
24 Police Department.

10:58:26 25 Q And how long have you been a police officer?

10:58:28 1 A It will be just shy of seven years.

2 Q And what is your rank?

3 A Just officer.

4 Q All right. Did you author a supplement with

10:58:37 5 regards to this case?

6 A No.

7 Q And why did you not?

8 A So I was there mainly for a SWAT capacity. So

9 my supplement isn't done by me. My supplement's authored

10:58:51 10 by the SWAT commander.

11 Q How did you prepare for this deposition?

12 A I just reviewed the case. I reviewed prior

13 supplements that were in the -- in the -- in the ACISS.

14 Q Oh, so you reviewed other TSPD reports to jog

10:59:09 15 your memory?

16 A Uh-huh.

17 Q Do you remember which reports you reviewed?

18 A I remember briefly scanning over, at the time,

19 Detective Miller's, my SWAT commander's, Major Trill.

10:59:27 20 Q Did you review the tow receipt that you signed

21 for this case?

22 A I did.

23 Q Wonderful.

24 Did you -- how else did you prepare for your

10:59:36 25 deposition?

10:59:39 1 A As I said, just memory and what's on the
2 supplements.

3 Q Did you speak with anybody or text with anybody
4 about this?

10:59:49 5 A The only notification that I got was from the
6 State Attorney who informed me of it. That's about it.

7 Q And did you discuss particulars, any questions
8 that you were going to discuss with the State's Attorney?

9 A No.

11:00:04 10 Q No.

11 So on -- if you can recall back, in the early
12 morning hours of March 24th, 2023, or maybe it was the
13 late hours of the 23rd, do you recall being called out to
14 511 Seaview Drive in Tarpon?

11:00:26 15 A I do.

16 Q All right. Do you remember what time you
17 arrived?

18 A No, I do not recall.

19 Q No.

11:00:32 20 Do you remember what time you left the scene?

21 A Exact time, no. But if my memory serves me
22 right, I think it was somewhere in the realm of 4 or 5
23 a.m.

24 Q 4 or 5 a.m.

11:00:46 25 And that was on the 24th -- right? -- the

11:00:47 1 following morning?

2 A That would have been the following day, yeah.

3 Q During that time that you arrived and that you
4 left, did you leave the scene for any reason?

11:01:03 5 A No, not that I recall.

6 Q So you were there basically for a continuous
7 six, seven hours, approximately, basically?

8 A Yeah.

9 Q Okay. What did you do while you arrived at the
11:01:18 10 scene?

11 A Executed -- or assisted Largo PD in executing
12 the search warrant of the home. And then I stood on
13 perimeter for a few hours.

14 And, then, from there, I was told by, at the
11:01:39 15 time, Detective Miller to author up a tow form. And,
16 then, afterwards, just sat on a perimeter spot again
17 until I was relieved.

18 Q You said you were part of the SWAT team;
19 correct?

11:01:55 20 A Yes.

21 Q So were you part of the initial team that made
22 entry into the house?

23 A Yes.

24 Q So you went inside the house? Yes?

11:02:01 25 A Yes.

11:02:02 1 Q Okay. Very good.

2 And when you were inside the house, what did
3 you do?

4 A I just -- checking for people, the main thing,
11:02:13 5 just making sure that the home was clear.

6 Q You were on the residence level, or were you on
7 the garage level?

8 A I was on the residence level.

9 Q On the residence level.

11:02:23 10 A And then I think I made my way to the
11 screened-in porch that's kind of up top --

12 Q Yes.

13 A -- as well. Yep. That was really -- and then
14 I went downstairs briefly to clear an area, but I don't
11:02:35 15 think it was -- I don't remember what exactly it was,
16 maybe like a jacuzzi or something. I don't really
17 remember what it was.

18 Q Okay. And you said you took another watch
19 position or, rather, you were stationed outside after
11:02:53 20 your role inside the house was done?

21 A Yes.

22 Q Do you remember approximately what time you
23 went outside and then you --

24 A I do not.

11:03:01 25 Q Okay. So -- and was it at that point that

11:03:06 1 Melton contacted you about the tow receipt?

2 A It was Detective Miller at the time.

3 I had been on that post for a couple -- a
4 couple hours, I'd say. I think I was taking a break from
11:03:25 5 the post.

6 Q Uh-huh.

7 A Because I know that they had brought some food
8 or something for us, so I got relieved for a moment. And
9 I think, somewhere in that time, I was asked to do it. I
11:03:35 10 don't exactly remember a timeline though.

11 Q Do you remember at approximately what time you
12 started working on the tow receipt?

13 A I want to say it was somewhere in the realm of,
14 like, 2 in the morning.

11:03:52 15 Q 2 a.m.?

16 A Yeah.

17 Q All right. Were you part of the discussions to
18 tow -- that they were going to tow the Tundra truck
19 outside?

11:04:02 20 A No.

21 Q No.

22 Do you know how that plan materialized or
23 anything?

24 A No, sir.

11:04:05 25 Q Were you the one that called for the tow truck?

11:04:08 1 A No.

2 Q Okay. Do you recall having any discussions
3 with anybody about who was going to follow the tow truck?

4 A No.

11:04:18 5 Q No.

6 But you didn't call -- just to make sure, you
7 didn't call Bradford's Towing to arrange the tow?

8 A Myself, no.

9 Q Do you know who did?

11:04:29 10 A I believe it was Detective Miller, but I
11 couldn't say for sure.

12 Q All right. Do you remember what time the
13 wrecker arrived?

14 A I do not.

11:04:42 15 Q What about what time it left?

16 A I do not.

17 Q No.

18 Did you watch the Tundra truck, the gray pickup
19 truck that was there, being loaded onto the wrecker?

11:04:58 20 A Not that I recall.

21 Q Not that you recall.

22 So you can't tell me if the truck was driven
23 out of the garage prior to being loaded onto the wrecker
24 or whether they pulled up the wrecker to the garage and
11:05:08 25 then the Tundra was loaded?

11:05:10 1 A I couldn't say -- I couldn't tell you that I
2 saw it, but I know that nobody had gone into that truck,
3 as far as I know, to drive it. It's a crime scene.

4 Q Okay. Do you know about the keys for the
11:05:23 5 Toyota Tundra?

6 A No.

7 Q You didn't know where they were located or
8 anything, put inside the Tundra or somebody from TSPD had
9 them?

11:05:35 10 A No.

11 Q Do you know if the Tundra was locked?

12 A No. No idea.

13 Q You already said that you didn't witness the
14 wrecker leave the scene -- right? -- with the Tundra
11:05:52 15 onboard on it?

16 A Uh-huh.

17 Q So --

18 A I don't remember. I may or may not have. I
19 can't tell you for sure.

11:05:58 20 Q You can't tell me for sure.

21 Okay. And did you see -- so I guess you
22 wouldn't be able to tell me if somebody followed the tow
23 truck, like a law enforcement agent, to follow the tow
24 truck; correct?

11:06:13 25 A I could just go off of our standard practice.

11:06:15 1 I know that we do have somebody follow the tow truck in
2 that sense, but I wasn't around to see that, that I
3 remember, so I can't --

4 Q Do you know who followed the truck?

11:06:27 5 A No.

6 Q No.

7 Did you, yourself, follow the truck?

8 A No.

9 Q Do you know where the truck was towed to?

11:06:40 10 A From reading supplements, from what I remember,
11 I believe it was towed to the forensics in Pinellas
12 County.

13 Q Forensics in Pinellas.

14 MR. KOSOWSKI: Mr. Vonderheide, can we quickly
11:06:57 15 get the tow -- Vehicle Tow and Storage Receipt on
16 the screen?

17 MR. VONDERHEIDE: Is that good?

18 MR. KOSOWSKI: Yes, it is.

19 Can you scroll to the beginning?

11:07:09 20 MR. VONDERHEIDE: Yes, sir.

21 MR. KOSOWSKI: And, Lisa, this will be
22 incorporated as Exhibit C, please.

23 (Vehicle Tow and Storage Receipt was marked
24 Defendant's Exhibit C for identification.)
25

11:07:16 1 BY MR. KOSOWSKI:

2 Q Mr. Reyes, do you see the -- do you see the
3 Vehicle Tow and Storage Receipt on the screen?

4 A I mean, I see it. It's hard to read. Oh, I
11:07:29 5 can zoom. We're good. I can zoom on this. I got it.

6 Q All right. And just to confirm --

7 MR. KOSOWSKI: I'm sorry, Mr. Vonderheide. Can
8 you go to the end of the tow receipt?

9 BY MR. KOSOWSKI:

11:07:47 10 Q Is that your name and signature at the bottom
11 of this tow receipt?

12 A Yes.

13 Q Wonderful.

14 MR. KOSOWSKI: Let's go back to the top.

11:07:56 15 BY MR. KOSOWSKI:

16 Q Did you actually fill this part out yourself?

17 A Yes. I mean, some of the information, whenever
18 you run it, it's auto-populated, but --

19 Q Uh-huh.

11:08:09 20 A -- I tabbed through it to input it, correct.

21 Q You tabbed through it.

22 Okay. Now, is this like a standard vehicle tow
23 receipt that Tarpon Springs uses, or is this something
24 that was provided by the tow truck operator?

11:08:22 25 A No. This is done through the program Trax,

11:08:25 1 which is our program -- or a program that we use.

2 Q Okay. Gotcha.

3 All right. So just reading through the top, it

4 says: Tarpon Springs PD. And it gives the address of

11:08:34 5 the TSPD. Then it says: Tow Information, and gives a

6 date of 3-24-23 and the time was 2:31.

7 What does that 2:31 a.m. time designate?

8 A The time that the -- the form is being, like,

9 authored.

11:08:57 10 Q Okay. So when you're -- when you're

11 actually --

12 A So when I generate it, that's the timestamp

13 that it creates.

14 Q Okay. So that's -- so, like, at 2:31, that's

11:09:06 15 when, like, you would have opened Trax and you're putting

16 stuff in, basically?

17 A Yeah.

18 Q Gotcha.

19 And there's no time for Wrecker Arrived and

11:09:15 20 Wrecker Left; correct?

21 A Correct.

22 Q Okay. So the next box just, basically, has

23 some identifying information for the truck itself; right?

24 Its VIN number and the owner and its color; correct?

11:09:31 25 A Yep.

11:09:32 1 Q Okay.

2 MR. KOSOWSKI: Let's scroll down a little bit.

3 BY MR. KOSOWSKI:

4 Q The next box says: Driver or Last Person in

11:09:41 5 Possession. And that's empty; correct?

6 A Correct.

7 Q All right. And then the next box down, it

8 says: Roadway Information. And it says: 511 Seaview

9 Drive; correct?

11:09:54 10 A Yep.

11 Q And that's the scene of the search warrant;

12 right?

13 A Correct.

14 Q All right. And the next box --

11:10:01 15 MR. KOSOWSKI: Can you scroll down a little

16 bit, Mr. Vonderheide?

17 MR. VONDERHEIDE: Sure thing.

18 BY MR. KOSOWSKI:

19 Q It says: Towed to Location.

11:10:11 20 A Uh-huh.

21 Q And it says: Bradford's. And it gives an

22 address of 1553 Savannah Avenue, Tarpon Springs, Florida,

23 and it gives a Zip code and a phone number; correct?

24 A Yep.

11:10:24 25 Q So is it your understanding that the tow truck

11:10:26 1 was towed to Bradford's tow yard?

2 A No. That's just a tow -- whenever we have --
3 whoever is next on our rotation, whether it be
4 Bradford's, Pete's Towing, or -- I think those are the
11:10:38 5 only two we use now -- that's just an autofill.

6 So, like, it makes me check who's picking up
7 the car. Whenever I check that person, it just
8 auto-populates that information to the tow form.

9 Q Okay. So you didn't -- you didn't write this
11:10:53 10 stuff -- this box, at least, anyway, yourself?

11 A No. No. That's just an autofill. Any time we
12 click either Bradford's or if I click Pete's Towing,
13 which is our other company that we contract, their
14 information automatically gets thrown into that section.

11:11:08 15 Q Okay. But you didn't see a wrecker leave
16 yourself -- right? -- with your own eyes?

17 A That I can recall, I couldn't tell you.

18 Q And you didn't follow the wrecker; right?

19 A No, I did not follow the wrecker.

11:11:20 20 Q All right. So you can't -- you can't confirm
21 that the truck didn't go to Bradford's; correct?

22 A As far as I know, it went to PCS or forensics.
23 It didn't go to Bradford's.

24 Q Okay.

11:11:36 25 A That's Vance calling me. There we go. Sorry.

11:11:38 1 Q No problem.

2 MR. KOSOWSKI: Mr. Reyes, those are all the

3 questions I have for you. Hopefully you'll get back

4 to your phone call.

11:11:44 5 THE WITNESS: No. You're good. Thank you,

6 guys.

7 MR. KOSOWSKI: Thank you very much for your

8 time. I appreciate it.

9 MR. VONDERHEIDE: No questions from me.

11:11:51 10 MS. SPADARO: No questions.

11 THE WITNESS: All right. Have a good day,

12 guys.

13 MR. KOSOWSKI: You as well.

14 THE COURT REPORTER: Do you-all do read and

11:12:04 15 sign for the officer?

16 (Officer Reyes left the Zoom videoconference.)

17 MS. SPADARO: We'll have him read it.

18 MR. VONDERHEIDE: Yeah. We'll let him read it

19 in the event it's ordered.

11:12:11 20 All right. I think that's it for today.

21 (The testimony of OFFICER MARIO REYES was

22 concluded at 11:12 a.m.)

23

24

25

11:12:17 1 CERTIFICATE OF OATH

2

3 STATE OF FLORIDA)

4 COUNTY OF PINELLAS)

11:12:17 5

6

7 I, the undersigned authority, certify that

8 MARIO REYES appeared before me via Zoom

9 Videoconferencing on the 28th day of August, 2026, and

11:12:17 10 was duly sworn.

11

12 WITNESS my hand and official seal this 28th day

13

14 of August, 2026.

11:12:17 15

16

17

18

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

11:12:17 20

21

22

23

24

11:12:17 25

11:12:18 1 CERTIFICATE OF STENOGRAPHIC REPORTER

2 STATE OF FLORIDA)

3 COUNTY OF VOLUSIA)

4 I, Lisa L. Taylor, Registered Professional Reporter,

11:12:18 5 Florida Professional Reporter-Certified, certify that I

6 was authorized to and did stenographically report the

7 foregoing proceedings, Pages 1 through 17; that a review

8 of the transcript was requested; and that the transcript

9 is a true and complete record of my stenographic notes.

11:12:18 10 I further certify that I am not a relative,

11 employee, attorney, or counsel of any of the parties, nor

12 am I a relative or employee of any of the attorneys or

13 counsel connected with the action, nor am I financially

14 interested in the action.

11:12:18 15 DATED this 8th day of September, 2026.

16

17

18



19

LISA L. TAYLOR, RPR, FPR-C,
Registered Professional Reporter
Florida Professional Reporter-Certified

11:12:19 20

Verified Digital Certificate

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11:12:18 1 **IN THE** CIRCUIT COURT, SIXTH JUDICIAL CIRCUIT,
2 IN AND FOR PINELLAS COUNTY, FLORIDA
 CASE NUMBER: 2023-CF-2935

3
4 STATE OF FLORIDA,

11:12:18 5
6 vs.

7 TOMASZ KOSOWSKI,
8
9 Defendant.

11:12:18 10 _____/

11
12 IN RE: Deposition of OFFICER MARIO REYES
13 TAKEN: August 28, 2026
14 DATE SENT TO THE WITNESS: September 8, 2026

11:12:18 15 The above-referenced transcript has been completed
16 and awaits reading and signing.

17 Please review the attached copy of the transcript
18 and note any corrections on the errata sheet within 30
19 days or before the date of trial. Once the errata sheet
 has been completed, please forward it to
 vpreporters@aol.com. Once received, it will be forwarded
 to all ordering parties.

11:12:18 20 Thank you.

21

22

23

24

25

11:12:18 1 ERRATA SHEET

2 IN RE: STATE OF FLORIDA V. TOMASZ KOSOWSKI

3 Case No.: 2023-CF-2935

4 Deposition of OFFICER MARIO REYES, taken

11:12:18 5 August 28, 2026/LT.

6	Page	Line	Change and Reason for Change
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21	_____	_____	_____
22	Under penalties of perjury, I declare that I have read		
23	the foregoing document and that the facts stated in it		
	are true.		
24	_____	_____	
	Date	Signature	
25			