

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT

IN AND FOR PINELLAS COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

v.

Tomasz Roman Kosowski

Defendant

Case No.: 23-02935-CF

DEFENDANT'S PRO SE MOTION TO COMPEL COMMUNICATION RECORDS

Defendant Tomasz Kosowski comes now asking the Court to order The State to provide comprehensive communication records including text messages, emails, voicemails, letters, and any other correspondence between Mr. Nathan Vonderheide, Mrs. Alexandra Spadaro, and Mr. Bruce Bartlett of the State Attorney's Office and between Mr. Bjorn Brunvand of the Brunvand Wise legal group from March 21, 2023 to present time. Grounds are as follows:

1. On 3/27/2023, the Defendant hired Brunvand Wise legal group to represent him in the above case.
2. In subsequent weeks after he was hired, Mr. Brunvand revealed to the Defendant that he is close friend of Mr. Bartlett, the State Attorney, and that he has had several private discussions with Mr. Bartlett concerning the guilt of the Defendant. Mr. Brunvand added that he was privy to PowerPoint presentations, including those used at the Grand Jury hearing, and several documents not in the legal record due to his close relationship with Mr. Bartlett.
3. After he was hired, Mr. Brunvand also revealed to the Defendant that he has a good non-collegial relationship with Mr. Vonderheide. He insisted that this relationship would benefit the Defendant in the course of his representation, specifically if a plea bargain agreement was sought by the Defendant or if the case went to trial, where Mr. Brunvand stated he would have insider knowledge of prosecutorial strategy.
4. On 5/1/2025, Mr. Brunvand withdrew as the Defendant's attorney after receiving private communication from Mr. Vonderheide. At the withdrawal hearing, Mr. Vonderheide stated he indeed had a private conference with Mr. Brunvand without the Defendant's knowledge where he shared video of the Defendant discussing Mr. Brunvand's poor representation with his mother.
5. As a result of Mr. Vonderheide's intrusion of privacy, Mr. Brunvand withdrew as Defendant's council 2 weeks prior to trial, and the trial was continued for another 16 months to September 2026.

6. On June 10, 2026, Mrs. Jane McNeill, stand-by council for the Defendant, filed a public records request (PRR26-00683) with the State seeking communication records between the State and Brunvand Wise legal group. Mr. Bartlett declined to respond to the request pursuant to Sec 119.071(2)(c) and 119.071(1)(d) of Fla Stat. Sec 119.071(2)(c) protects from disclosure documents relating to an active criminal investigation, while 119.071(1)(d) concerns documents prepared in anticipation of litigation.

7. WHEREFORE the criminal investigation this case has concluded and litigation has been completed, the Defendant states the The State has no further basis for refusing to produce these communication records and as a result asks The Court to order State to produce the following:

A. All text messages, emails, voicemails, letters, or any other communication between Mr. Bjorn Brunvand and Mr. Nathan Vonderheide from 3/21/2023 to present time;

B. All text messages, emails, voicemails, letters, or any other communication between Mr. Bjorn Brunvand and Mrs. Alexandra Spadaro from 3/21/2023 to present time; and

C. All text messages, emails, voicemails, letters, or any other communication between Mr. Bjorn Brunvand and Mr. Bruce Bartlett from 3/21/2023 to present time.

WHEREFORE, the Defendant, Pro Se, respectfully requests this Honorable Court to enter its order to compel all communication records.

Submitted: October 6, 2026

Tomasz R Kosowski, pro se

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by email to Mr. Nathan Vonderheide, Assistant State Attorney, Sixth Judicial Circuit of Florida, at eservice@flsa6.gov on October 6, 2026.