

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 TO COMPEL FINGERPRINTS

Comes now, BRUCE BARTLETT, State Attorney for the Sixth Judicial Circuit of Florida, and moves to compel the Defendant to provide fingerprints pursuant to Fla.R.Crim.P.3.220(c)(1)(c), and as good cause and grounds therefore would show:

1. Defendant has been charged by indictment with first degree murder.
2. S.C. disappeared from an office suite located at 1501 S. Belcher Rd., Building B, Largo, Pinellas County, Florida.
3. Defendant's fingerprint was located at 1501 S. Belcher, Building B, in an area where there is no reasonable explanation for its placement.
4. The fingerprint examiner who conducted the analysis of the fingerprints, Heather Legg, no longer works for the PCSO AFIS Division -Latent Unit.

5. The original fingerprint identification was based on known standard prints of Defendant that were entered into a database.
6. In anticipation of trial, the State of Florida requests that Defendant provide his prints so they can be compared to the latent print recovered at 1501 S. Belcher Road, Building B.
7. Additionally, many latent prints were located at 1501 S. Belcher Road, Building B, that require better known prints in order to complete a comparison. These prints include, but are not limited to, fingerprints and palm prints.
8. That the fingerprints are necessary for a complete investigation and prosecution of the instant case.

WHEREFORE, the State of Florida moves this Honorable Court to enter its Order granting the State's Motion to Compel to Fingerprints.

I HEREBY CERTIFY that a copy of the above has been furnished to Bjorn Esq Brunvand, Attorney, BRUNVAND WISE P A, 615 TURNER ST, CLEARWATER, FL 33756, bjorn@acquitter.com, by e-service or personal service or U.S. Mail this 4th day of November, 2024.

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