

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

STATE OF FLORIDA,

Plaintiff,

vs.

Case No.: 2023-02935-CF

TOMASZ KOSOWSKI,

Defendant.

_____/

VIRTUAL DEPOSITION OF SANDRA-LEIGH COPELAND

DATE TAKEN: DECEMBER 6, 2023

TIME: 2:19 p.m. - 4:44 p.m.

Examination of the witness taken virtually before:

Tammy Kelley

Verbatim Court Reporting, Inc.
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APPEARANCES

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I N D E X

DECEMBER 6, 2023

WITNESS

Called by the Defendant:

SANDRA-LEIGH COPELAND

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1 THE COURT REPORTER: Would you raise your
2 right hand, please. Do you swear or affirm the
3 testimony you shall give in this cause shall be
4 the truth, the whole truth, and nothing but the
5 truth?

6 THE WITNESS: I do.

7 SANDRA-LEIGH COPELAND, called as a witness by
8 the Defendant, having been virtually duly sworn,
9 testified as follows:

10 DIRECT EXAMINATION

11 BY MR. BRUNVAND:

12 Q Good afternoon.

13 A Hello.

14 Q My name is Bjorn Brunvand and I represent
15 Tomasz Kosowski. We're here on State of Florida versus
16 Tomasz Kosowski. Nathan Vonderheide and Alexandra
17 Spadaro are present for the State.

18 And if you could please state your name.

19 A Sandra-Leigh Copeland.

20 Q And your former name?

21 A Sandra-Leigh King.

22 Q Okay. The -- I want to first of all go
23 through the supplements that I have to make sure that I
24 have all the supplements of the work that you did in
25 this case.

1 A Okay.

2 Q So I have supplement number nine which is a
3 five-page report.

4 A Yes.

5 Q I have supplement 11 which is a four-page
6 report.

7 A Yes.

8 Q I have supplement 12 which is a three-page
9 report.

10 A Yes.

11 Q I have supplement 14 which is a three-page
12 report.

13 A Yes.

14 Q I have supplement 25 which is a four-page
15 report.

16 A Yes.

17 Q And that's it.

18 A Yes.

19 Q Okay, perfect. Have you had an opportunity
20 to review those reports for accuracy and completeness?

21 A I have, yes.

22 Q Does it describe everything that you did in
23 this case?

24 A Yes.

25 Q And what is your title?

1 A I am now the assistant forensic science
2 supervisor.

3 Q And at the time was your title the same or
4 has it changed?

5 A I was a forensic science specialist.

6 Q And tell me a little bit about your
7 background.

8 A I have a bachelor of science in psychology
9 and I have an associate's degree and a certificate in
10 crime scene technology.

11 Q And how long have you worked with the
12 Pinellas County Sheriff?

13 A It was eight years in August.

14 Q Okay. So it appears that the first time that
15 you get involved in this case is March 21st you get a
16 call at 1858 hours.

17 A Yes.

18 Q And then you arrived at 1501 South Belcher
19 Road about 1939 hours.

20 A Yes.

21 Q Okay. And what, if anything, did you know
22 about the investigation when you arrived at the scene?

23 A Well, at the scene I was briefed that we
24 were about the -- about a missing person.

25 Q Okay. And who advised you at the scene?

1 A Would be Detective Bolton.

2 Q Okay, all right. And who else was present
3 when Detective Bolton informed you about the status of
4 the case?

5 A With me it was Forensic Specialist Levesque
6 and Assistant Supervisor Sanford and then Clark.

7 Q Okay. Now, looking in your -- reading the
8 narrative of your report, it appears that Clark -- it
9 says, "Clark later arrived on scene to relieve
10 Supervisor Sanford."

11 A Oh, yes. Yes. I believe she -- I didn't
12 know the time lapse between when she, she arrived.

13 Q Okay. So presumably Clark was not present
14 then when Bolton was providing the update?

15 A Correct.

16 Q Okay. The -- you say, "Using my digital
17 camera I took overall photographs." What type of a
18 camera is that?

19 A It's a Nikon.

20 Q Which model?

21 A I believe the 5000.

22 Q Okay. It's an SLR, right?

23 A Yes.

24 Q Okay. I'm going to go up and see if I can
25 pull up some of your photos.

1 Is that the first thing that you do?

2 A Yes. We get briefed on, on the scene, the
3 incident. We do a general walk-through of the scene
4 and then I begin photographs.

5 Q Did, did -- Detective Bolton, did he remain
6 at the scene when you guys were there?

7 A I don't recall.

8 Q Okay. I have a cheat sheet with all the
9 photo series. Helps me find yours. And you have quite
10 a few.

11 A Yes, I do.

12 Q Let's see here. So I believe the first
13 series that you have is the B series. B as in bravo.

14 A I don't know what they're labeled as.

15 Q Let me -- well, let's pull them up and then
16 you can confirm whether or not this is your set of
17 photos.

18 59101, is that your number?

19 A Yes.

20 Q Okay. So if, if the sequence of number after
21 the letter B has 59101, that would be, that would be
22 you, right?

23 A It should be, yes.

24 Q Okay. We'll take a look.

25 Okay. I'm just going to admit Ms. Ramos who

1 is another lawyer in my office.

2 (Ms. Ramos joins the virtual deposition.)

3 Q All right. So does this appear to be the
4 beginning of your photographs?

5 A Yes.

6 Q Okay. You have your former name and then
7 your payroll number. Right?

8 A Correct.

9 Q All right. And so when you arrive, I assume
10 it was dark outside?

11 A It was, yes.

12 Q All right. And the initial set of photos,
13 there's some outside. Number five, what are we looking
14 at in number five?

15 A That is the front lobby to, to that office
16 building.

17 Q Okay. Do you recall after you entered the
18 front lobby what's the next area that you go to, if you
19 recall?

20 A The next area. I believe it was the office.

21 Q Okay. Yeah, I mean if you -- and it's
22 perfectly okay to say if you don't remember just to say
23 I don't remember. But the --

24 A It should have it in -- yes, there we go.

25 Q There are -- photos that is the office.

1 Before we get to that, the -- looking at number seven,
2 the -- you're looking into a hallway and there appears
3 to be a men's room and there's a paper carton box
4 that's sitting in front of the door.

5 Do you see that?

6 A Yes.

7 Q Okay. And the -- if you look in number
8 eight, behind that paper box there appears to be some
9 sort of a piece of paper on the ground.

10 A Yes. It was a napkin.

11 Q A napkin. Okay.

12 A Yes.

13 Q So that was there when you arrived?

14 A Yes.

15 Q Okay. And do you know when that ended up
16 there, how long it had been there?

17 A That I have no clue.

18 Q Okay, all right. Do you recall if this
19 particular photo did you take it at this angle so you
20 could see that piece of paper or is it just accidental
21 that it shows up in the photo?

22 A No, I think it was just to -- because I'm
23 not making entry into that area.

24 Q Okay.

25 A So I just -- so it's basically a little

1 further away and then, yes, angled so that it does
2 show that, that napkin there as well.

3 Q But beyond that, you don't really know much
4 about that napkin at that point in time, right?

5 A I do not, no.

6 Q Okay, all right. So next series of photos
7 appear to be in the Blanchard Law Office. And then I'm
8 going to jump to 15.

9 A Okay.

10 Q What are we looking at here in 15?

11 A So that was leaving his office and basically
12 looking, like, turning left and that was the immediate
13 corridor to the left.

14 Q So you're looking south of --

15 A South, yes.

16 Q Okay, all right. And what about number 18?

17 A So that would be the corridor then to -- so
18 you're heading south down that corridor and then
19 right.

20 Q And what's behind that door?

21 A That was the -- what we call the electrical
22 room.

23 Q Okay, right. What's the significance of 20?

24 A We always go ahead and document any door
25 handles, door locks, the door jambs. It's just to

1 show whether there's any kind of damage, anything
2 missing. And in this case there was no, there was no
3 door handle.

4 Q Okay, all right. And that's -- the next
5 photo in 21 is following up on the same thing?

6 A Yes.

7 Q So we've looked at a lot of these photos from
8 the utility closet. I'm not going to necessarily look
9 at all the photos again.

10 Do you know if the -- look at 42 here. Do
11 you know if this ladder accesses the roof of the
12 building?

13 A I don't know the roof, but it was to an
14 attic area.

15 Q Okay. Did you happen to take a photograph
16 looking up into the --

17 A Yes.

18 Q -- opening of the roof?

19 A Yes. There should be a photograph of that
20 area once I was, once I was up there.

21 Q The cleaning supplies that we're seeing in
22 48, are these cleaning supplies that were in that same
23 closet?

24 A Yes.

25 Q So it looks like you pretty much photograph

1 extensively everything that's inside of, of that
2 closet. Right?

3 A Yes.

4 Q 68. Looks like, what, some tiles and some
5 gloves?

6 A Yes.

7 Q Any, any significance of that as far as this
8 investigation?

9 A No. I did later collect them. But, again,
10 we document -- we are documenting everything.

11 Q Okay. Had this area been processed for
12 fingerprints at this point?

13 A No.

14 Q All right. I scanned through the first
15 hundred. So I am going to exit out of that and then
16 pick up the next hundred. And unfortunately I have to
17 do it with small sections at a time because otherwise,
18 like, it freezes up on me.

19 A Yes.

20 Q And starting up at 101. And, again, I'm just
21 scrolling through it. Seems to be more photos from
22 that same closet?

23 A Yes.

24 Q 131. Again, shows the ladder and the
25 entryway at least up into the attic area?

1 A Yes.

2 Q And you're not sure whether or not there was
3 an exit point there?

4 A No, I did not -- I didn't go really -- I
5 didn't go inside it. Just that area that I'm not sure
6 it was structurally safe.

7 Q So 133, is that taken from the top of the
8 ladder looking into the --

9 A Yes.

10 Q -- office? Okay. Did you take --

11 A I believe that the entire room too.

12 Q Okay. Do you take a photo looking straight
13 up where you are? I've seen in other photos where it
14 looks like there's some sort of a metal plate and maybe
15 some sort of a handle.

16 A No, I didn't take that photograph.

17 Q Do you remember seeing the handle and the
18 metal plate straight above, straight up?

19 A No, I don't recall.

20 Q Okay. But if it shows up in other photos,
21 you're not suggesting that it wasn't there, you just
22 don't remember seeing?

23 A Correct, yes.

24 Q Okay. I'm sorry? I couldn't hear that.

25 MS. SELLERS: Sorry, I didn't realize I

1 unmuted. It was me.

2 MR. BRUNVAND: Okay.

3 Q What are we looking at here, 140, this box?
4 What's that?

5 A Can you show me what the photograph before
6 that is.

7 Q 139.

8 A So it appears to be a box that was, like, on
9 that metal shelf at the very end of the, of the
10 electrical room.

11 Q Okay.

12 A And it's just, again, to -- 140 is just to
13 show that the box is still intact and it hasn't been
14 opened.

15 Q Okay. And then in 142 it appears that we're
16 now back out in the hallway by the bathrooms.

17 A Yes.

18 Q And do you enter a particular bathroom first?
19 What are we looking at here at 145?

20 A So I entered the women's bathroom first.
21 And, again, that's to show the -- I guess because
22 there's no door handle, that's the metal plate that
23 you would push to enter into the bathroom.

24 Q Okay, all right. And then those are just
25 interior photos from the ladies' bathroom?

1 A Yes.

2 Q Appears to be a little bit nicer than the
3 men's bathroom.

4 A It usually is.

5 Q All right. We'll skip through those.
6 Anything of significance in the ladies'
7 bathroom?

8 A No.

9 Q Okay. So 181 you're back out in the hallway.
10 And 184 appears to be close-up of the box that's
11 sitting in front of the entryway to the bathroom for
12 the men's bathroom?

13 A Yes.

14 Q And then I'm assuming between 184 and 185
15 there must have been some sort of a delay because in
16 185 we now have Evidence markers placed on the floor.

17 A Yes. So basically 184, even though it
18 doesn't show up very well in the photograph, I'm
19 really taking a photograph of that floor space.
20 Because I could see -- you'd have to use oblique,
21 which is side lighting, to kind of see some possible
22 shoeprints.

23 So that's where the photo markers were
24 placed. I believe one through four and then number
25 five was for the, for the napkin.

1 Q And are you saying that you can see
2 shoeprints in this photo in 184, or?

3 A So you -- because the flash goes directly
4 onto the floor, you can't see the shoeprints. But I'm
5 just showing, like, this general area before I go
6 ahead and place the photo markers and then later in
7 the photos I go ahead and take photographs of the
8 possible shoeprints.

9 Q Okay. 188, shows -- is it a napkin or paper
10 towel? What is it?

11 A I labeled it as I believe a napkin, a napkin
12 with possible blood.

13 Q Okay. And did you do anything for -- to
14 further have that tested for blood?

15 A Further, like, at the end of -- at the --
16 like in the next supplement. So basically --

17 Q Okay.

18 A -- next day.

19 Q So, but you collected it on this day?

20 A Yes.

21 Q Okay, all right. So we'll talk about that
22 when we get to that. Any significance of these mailing
23 labels?

24 A No. Again, I just go ahead and -- because
25 obviously I don't know if there's any significance

1 toward it or not. But I go ahead and photograph any,
2 any kind of writing or labels that I observe on it.

3 Q Okay. Go to the next. I think there's
4 about --

5 A There's 700 and I believe 79 -- 771 photos.

6 Q Okay. It's like me and my birth photography,
7 thousands of photos in a very short time period.

8 A Yes.

9 Q All right. All right, so I want to jump
10 to -- it looks like we're dealing with marker one. And
11 is this the possible shoeprint that you were referring
12 to?

13 A Yes.

14 Q Okay. Still kind of hard to see, but.

15 A It is. It's the reflective surface and so
16 we just try to document as best as possible.

17 Q Sure. Sure. 205, is that the same print?

18 A Yes.

19 Q Okay. It's a little bit easier to see in
20 that photo. All right. And then basically you go on
21 and you do the same type of documentation for the other
22 prints in the same general area.

23 A Yes.

24 Q 223, I can tell that it's the door to the
25 bathroom. But is there anything else that you noticed

1 that you can point out in this photo of any
2 significance?

3 A No. That's just a general photograph of
4 the, of the door. It's just, again, to show kind of
5 also where I'm going.

6 Q Okay. So basically all the photos of the
7 front of the door. 229 you have marker -- is that the
8 front or the inside of the door?

9 A No, that's the front. So, again, it doesn't
10 show -- it doesn't come up very well. But there
11 was -- I don't know if you can see it in this
12 photograph. But there's kind of like a -- what
13 appears to be like a brownish stain on the front door.
14 So I documented that.

15 Q Okay. Did you do any type testing on that?

16 A No.

17 Q Okay. Why not?

18 A That's not -- I didn't do it. So you have
19 to -- I don't know if that was Specialist Levesque or
20 perhaps Specialist Hook.

21 Q Okay. You're not saying that it wasn't done,
22 you're just saying you didn't do it?

23 A Yes, correct.

24 Q Okay, all right. Do you point this out? Is
25 anyone following you and you're pointing out certain

1 things that you're seeing while you're doing the
2 scanning of the office so to speak?

3 A Basically whenever we go ahead and hand off
4 the scene to other specialists, we'll go ahead and do
5 another walk-through with like the supervisor and the
6 specialists on scene and relay what we've observed.

7 Q Okay. And 230 is just a close-up of the same
8 area?

9 A I believe that may be a different area.
10 Yeah, it doesn't seem to have the same pattern, yeah.

11 Q Again, it's also on the outside of the door?

12 A Yes.

13 Q And then 232 is with the marker for that
14 other area.

15 A Yes, of the close-up of that sort of second
16 pattern area if you want to call it.

17 Q Okay. 233?

18 A It's that metal plate for the men's door.

19 Q Anything else beyond the metal plate that's
20 significant?

21 A Again, you can see in that photograph that
22 there appears to be some kind of residue.

23 Q Um-hum.

24 A But this is just a general photo of that
25 metal plate area.

1 Q Was there a lock on the door for the men's
2 room?

3 A On the exterior?

4 Q On the exterior.

5 A A lot of what?

6 Q No, a lock.

7 A Oh, a lock. I'm sorry. I thought you said
8 a lot. No.

9 Q Okay, all right. And this is just a close-up
10 of that same --

11 A Of that residue area, yes.

12 Q All right. And if anyone did any further
13 testing on that, it wouldn't be you? And we're looking
14 at 235.

15 A That's correct.

16 Q So 239, is, is this the first time that you
17 entered the men's bathroom?

18 A Yes.

19 Q And what information had you already obtained
20 about the men's bathroom before you, before you entered
21 it?

22 A I don't recall. I believe they may have
23 told us that this may have been an area where
24 something occurred.

25 Q Okay.

1 A I do remember that they did tell us that
2 they had seen some possible blood in, like, a certain
3 area of the bathroom.

4 Q Okay. And looking at this photo, are you
5 seeing any possible blood in this photo?

6 A I mean in this photograph you can't really,
7 you can't really tell if there's any blood at this
8 point.

9 Q Okay. And that's in 239, right?

10 A Yes.

11 Q Okay. What about in 241?

12 A So this is leading towards that urinal area.
13 And then I believe I take photographs getting closer
14 to it. And then you do see some possible blood on
15 the -- kind of like on that wall.

16 Q On which wall?

17 A On -- it's to the right of the urinal.

18 Q To the right of the urinal?

19 A Yes.

20 Q Okay. So I will --

21 A Right there, yes.

22 Q Okay. So as I'm looking at the urinal, that
23 appears to be to the left of the urinal, right --

24 A Yes.

25 Q -- as we saw on 243?

1 A Yes.

2 Q Other than photographing that, did you do
3 anything else as it relates to those drop- -- would you
4 agree they look like droplets maybe?

5 A Yes. And, no, I just -- I just documented
6 it, photographed.

7 Q All right. What about 244?

8 A That was directly underneath the, underneath
9 the urinal.

10 Q Okay. And are you seeing areas on this
11 photograph that you think look like possible blood?

12 A I mean I would just determine some areas
13 possible blood. But, again, it's just a photograph at
14 this point of just the general area.

15 Q Okay. And the photograph sort of speaks for
16 itself. Would you agree?

17 A Yes.

18 Q Okay. 247, cleaning supplies?

19 A Yes. That's just, again, documenting what
20 was inside that cabinet.

21 Q Okay. Looks like maybe there had been some
22 sort of a leak under there at some point?

23 A That I don't know.

24 Q Okay. And I'm looking in the center like
25 right under the pipes there. It looks like some --

1 A Some kind of residue.

2 Q Right. And maybe, like, there had been some
3 liquid at some point that's dried up?

4 A Possibly.

5 Q All right. So 248 -- do you have any idea
6 what time, what time it is now? We --

7 A It should have it on the, on the metadata of
8 that photograph. I don't know if you can --

9 Q So --

10 A -- see it.

11 Q No. But I will, I will try to figure that
12 out. So all of these photos should have metadata that
13 would give us the exact times. And so I will, I will
14 try to find that out myself by looking at the metadata
15 of the photos.

16 A Okay.

17 Q Anything that -- we're looking at 256 there.
18 Is anything unusual here? It looks like a garbage can,
19 papers.

20 A Right. It's just documenting in that little
21 corner that there's some paper towels, napkins, and
22 that, that trash can.

23 Q Okay, all right. Do you know if the trash
24 can was taken into evidence and the contents of it?

25 A Yes. I collected that.

1 Q Okay.

2 A Not the, not the trash can but all the
3 contents and the, and the plastic bags.

4 Q Right. 260, what are we looking at here in
5 260?

6 A So that is that floor area. Kind of like
7 when you walk through the men's doorway. And, again,
8 just a general documentation of, of what appears to be
9 some stains and also what appears to be maybe some
10 kind of impression.

11 Q Like, like a shoe impression, or?

12 A It could be. It's very difficult to, to
13 tell on, on that surface. And I know you can't really
14 tell by the photograph. But those little circles,
15 they were raised up.

16 Q Okay.

17 A So it -- I can't say that it was a shoeprint
18 for sure. It could have been made by something else.

19 Q Okay. So these are just close-ups of trying
20 to depict the same --

21 A Yes.

22 Q 266?

23 A So, yes, in that area I observed what could
24 be possible blood.

25 Q And do you know whether or not these that

1 could be possible blood areas were swabbed?

2 A I presume that they were. But, again, that
3 was, that was not me.

4 Q Okay. Would you normally have -- when, when
5 someone is swabbing particular areas, would you
6 normally document that with photos while it's being
7 swabbed so that you can sort of know where the swab was
8 taken from?

9 A No, the swabbing comes later. So
10 photographs are always gonna be the first thing that
11 we do.

12 Q Right.

13 A Especially to show the scene as it is
14 untouched before we do anything to it.

15 Q Okay.

16 A Anything that is swabbed should -- obviously
17 should be photographed prior.

18 Q Right. But -- sure, be photographed prior.
19 But certainly would be -- it wouldn't be difficult to
20 have someone photograph the spot that's actually being
21 swabbed and correlate the two, right, while it's being
22 swabbed even though the photo was taken earlier of that
23 same location?

24 Sort of like when you have -- you see the --
25 what appears to be shoeprints, you take the photo, you

1 place the Evidence markers, then you take close-ups of
2 the area that you had seen.

3 A Yeah. Like I said, typically with the
4 swabs, they come, they come after all photography has
5 been done.

6 Q Okay. Is that a decision for the individual
7 specialist or is that --

8 A No. That's how, that's how we operate, we
9 operate. Our procedure is to go ahead and photograph
10 everything and then we go ahead and do swabs.

11 Q Okay. And just -- and not photograph while
12 the swabs are being done?

13 A Correct, yes.

14 Q 289.

15 A So this is going now into the, the bathroom
16 stall.

17 Q Right.

18 A So that open, that open door. And a general
19 photograph of the floor in front of the toilet.

20 Q Right.

21 A And it looks like it could be possible
22 blood.

23 Q What about what we're seeing on the wall
24 that's lit up like in a light bluish color?

25 A Yes. So that that we weren't quite sure

1 what it was. It appears to be, it appears to be some
2 kind of like maybe paint that was -- like that gray
3 was removed with something and perhaps that blue paint
4 was underneath.

5 Q Okay.

6 A So that, that was -- that's no chemical
7 enhancement or anything, that blue.

8 Q Okay. So that's just the way it looked? I
9 mean --

10 A Yes. Yes. This was just on the, on the
11 wall.

12 Q Okay. And then 291, close-up of that same
13 flooring in the, in the stall?

14 A Yes.

15 Q And, again, you're just documenting
16 everything thoroughly with your camera?

17 A Yes.

18 Q All right. 300. Making progress.

19 Am I sharing the screen now, or no?

20 A Yes. Oh, no, not -- no, I don't see the
21 photos.

22 Q Now you can see it?

23 A Yes.

24 Q Okay. These are just additional photos
25 inside of the stall without any type of enhancements or

1 anything like that. Right?

2 A No, these -- the photograph that you just
3 showed me, I believe they were out by the urinal.

4 Q Oh, they were by the urinal?

5 A Yes. What photograph was it that you
6 previously -- yes.

7 Q These by the garbage pails. That's by the
8 urinal?

9 A Yes.

10 Q Okay. And that was 307.

11 A And now, yes, 315 is of the bathroom stall.

12 Q Okay. And, again, so the bluish that we see
13 on the wall there just happens to be the way the paint
14 is on the wall. It's not indication of any type of
15 bodily fluids or possible blood or anything like that.
16 Right?

17 A No.

18 Q No meaning, meaning yes?

19 A No, it didn't appear that there was any,
20 like you said, bodily fluids or possible blood. It
21 just looked like maybe something had been applied to
22 the wall and, and the paint came off.

23 Q Okay.

24 A Yeah; I'm not really sure what that, what
25 that blue is.

1 Q What about this mark on the side of the
2 toilet?

3 A So that was possible blood.

4 Q Okay. And that was image number 313.

5 A Yes.

6 Q And these marks, bluish marks on 329 is
7 just --

8 A It's just a close-up photograph of that same
9 area.

10 Q Of the paint basically?

11 A Yes.

12 Q 332?

13 A Possible blood towards the bottom of that,
14 of that area.

15 Q And you don't know whether or not that was
16 swabbed or not? That's someone else would have done
17 that?

18 A Yes.

19 Q Same with the ones we saw on the toilet?

20 A Correct.

21 Q 370, that's underneath the urinal?

22 A Possible blood underneath the urinal.

23 Q Okay. And, again, someone else would have --
24 if it was swabbed, someone else would have done that?

25 A I believe it was Specialist Levesque.

1 Q Okay. 385?

2 A The possible blood around that drain area by
3 the, by the urinal.

4 Q Okay. Does that look like it could also be
5 possible rust?

6 A It could be.

7 Q Okay. How many photos did you say in this
8 section?

9 A 771.

10 Q Okay, all right. We're at 401. And, again,
11 these are all photos of the bathroom area?

12 A I don't see them.

13 Q Oh. Sorry.

14 A No, that's okay.

15 Q Let's see here.

16 A Okay.

17 Q Possible blood, right?

18 A Yes.

19 Q 406, is that the sink in the men's room?

20 A Yes.

21 Q Are you seeing anything of potential
22 significance in this photo?

23 A No.

24 Q 409, drain for the sink?

25 A Yes. That's just to show what is or is not

1 there and the possible hair or fiber that's just
2 around it.

3 Q Okay, all right. And any indication of blood
4 that you can tell from this photo?

5 A No.

6 Q 415, what's the significance of this?

7 A Just showing the one view of the, of the
8 handle.

9 Q Okay.

10 A The faucet. It's just another, another
11 angle.

12 Q Looks like maybe some hard water damage under
13 here?

14 A Yes, appears to be.

15 Q Anything in particular about the contents of
16 the trash? I mean I see you photographed --

17 A I did -- so in later photographs I emptied
18 the contents and I did find two Ziploc bags and some
19 napkins or paper towels with possible blood on it.

20 Q Okay. 486, close-up of possible blood on the
21 floor?

22 A Yes.

23 Q And where is that from?

24 A That looks to be in the, in the stall.

25 Q Okay. 499?

1 A Possible blood on, like, the, the edge there
2 on the wall of the stall.

3 Q Facing what direction?

4 A East.

5 Q Okay. And then is this the same one just
6 with a ruler below it?

7 A Yes.

8 Q And that's 500.

9 A Um-hum.

10 Q 501 in the next series appears to be the same
11 image, just a little bit closer?

12 A Yes.

13 Q And all these photos are taken before there's
14 any Luminol testing or anything like that, right?

15 A Yes, correct.

16 Q 555, where is, where is that?

17 A So that was the -- I don't know what it's
18 called. Basically like on top of the toilet, the
19 little rectangular thing that covers the, like, the, I
20 guess, the inner parts of the bathroom.

21 Q The tank?

22 A Yes. Thank you.

23 Q Cover for the tank?

24 A Yes.

25 Q 158, 159, is this -- 160, is this content

1 from the trash can?

2 A No. That was on top of that -- of the lid
3 on top of the tank.

4 Q Okay, all right. 586?

5 A So that was that possible blood on the
6 toilet.

7 Q Is that on the toilet or on the urinal?

8 A On the toilet.

9 Q The toilet?

10 A Yes.

11 Q Okay. And I think we seen this in previous
12 photos if I'm not mistaken.

13 A Yes.

14 Q Just another close-up of it.

15 Okay. 601, what are we looking at?

16 A Can you show me the photograph right before
17 601. I believe that's the toilet bowl.

18 Q I have to X out completely.

19 A Oh, it's okay. Yes, it is the toilet bowl
20 area.

21 Q All right. I can show you the one after.

22 A Yes. So, yes, that's the -- like the --
23 yeah, the ceramic area. And next to it is a
24 photograph of, like, the plastic area. So it's toilet
25 bowl.

1 Q Okay. Is there anything in particular about
2 it, or?

3 A In this one it looks like it could be just
4 some kind of substance on it.

5 Q Okay. And so we're at 613. Is this inside
6 the stall or outside the stall?

7 A I believe that's outside.

8 Q Okay. What is this 630? It looks like it's
9 a --

10 A So that was when you exited the office and
11 you went south down that corridor. I believe that was
12 the room where you see the -- like, that wooden door
13 and then you entered this room and it had carpet on
14 the floor and then there was a glass -- that glass
15 back door. And I was asked to go ahead and photograph
16 this door and the mail that was on the ground.

17 Q Okay. It looks like it's maybe a previous
18 tenant, Construction Contractor Services?

19 A It could be. That I have no clue.

20 Q Okay. It looks like it's postmarked
21 September 2022 and this is March of 2023. Right?

22 A Yes.

23 Q 644?

24 A So it was observed that there was a possible
25 shoe impression in the carpet and I documented this.

1 It's -- obviously you can't see it very well in
2 carpet. But it shows a possible shoe impression.

3 Q Okay. And that was 644 if I didn't identify
4 the photo. 656, is that that same door we looked at
5 earlier that didn't have a lock on it, or?

6 A Could you go -- I believe -- could you go to
7 655.

8 Q Yes.

9 A Yeah. So this is just the men's bathroom.

10 Q Okay, all right. I mean looking at 655 it
11 doesn't look like it's had a lock on there.

12 A Correct, yes. So --

13 Q For quite some time.

14 A Yeah. Shows, shows the photograph of
15 inside, yeah.

16 Q Okay. 664, what are we looking at?

17 A So that's the -- so now we're in the men's
18 bathroom. Like the interior door handle to the door.

19 Q Right.

20 A And that one it could be possible blood, it
21 could be rust.

22 Q Okay. And whether or not it was swabbed or
23 not, you don't know, someone else would have done that?

24 A Yes. I believe Ashley Levesque.

25 Q Okay. What's 676?

1 A So this is what appears to be, like, again,
2 like, just a piece of the paper towel behind the
3 inside of the men's bathroom floor.

4 Q Okay. So that would be on the west side I
5 assume?

6 A Yes.

7 Q 679, this is the trash can again?

8 A Yes.

9 Q 682 is you're emptying the trash can I
10 assume?

11 A Yes.

12 Q Okay. And said that you saw possible blood
13 on some of the items in the trash can?

14 A Yes. This photograph --

15 Q Would that -- would 684 have what you
16 describe as possible blood on it?

17 A Yes.

18 Q Is that the stain that we see on the paper in
19 the center?

20 A Yes. And kind of, like, up the top there
21 and then on the bottom of that same sort of wad of
22 paper. Yes, that one.

23 Q Could also be a variety of other things,
24 right?

25 A It could be.

1 Q And all these papers were taken into
2 evidence?

3 A Yes.

4 Q All right. We're almost at the end of the
5 seven-hundred-and- --

6 A Seventy-one.

7 Q -- seventy-one. So we're at 171. We're
8 still looking at more photos of the same trash?

9 A Yes. It's kind of, like, in layers.

10 Q Okay. And then 723, empty trash can?

11 A Yes.

12 Q Did you collect the bag?

13 A Let me just take a look. I did, yes.

14 Q Okay. 726, what's, what's the purpose of all
15 the paper covering?

16 A So basically this is now when we're about to
17 do Luminol on the, on the floor. So --

18 Q Right.

19 A -- with Luminol in order to get a photograph
20 it needs -- the room or wherever you're conducting it
21 is -- needs to be as dark as possible.

22 So because those were glass doors, glass
23 windows, like, on the offices to the left and right,
24 we had to cover them with the brown trace paper and
25 then --

1 Q Right.

2 A -- the very top of the doors was the -- I
3 believe it's the Exit sign which emits, you know, the
4 red light. So we --

5 Q Right.

6 A -- had to cover that as well.

7 Q Okay. Because it's dark outside, right?

8 A It is. But there's light from, like, the
9 vet office in front of it and then I believe also the
10 building itself had, had light around the building as
11 well. So it was still light coming in.

12 Q Okay. 728 it almost looks like it's --

13 A Like it's daylight.

14 Q Right. But it's not, right?

15 A It's not, no. It was just -- I believe this
16 is once we already applied Luminol and now it's, it's
17 a photograph just showing if anything is luminescing.

18 Q Okay. Are you seeing anything?

19 A No.

20 Q Okay. So 730, 731. There's a marker, seven,
21 eight.

22 A Seven, eight, and that's six. It shows it
23 better in 732, yes.

24 Q Okay. And what, what are seven -- or six,
25 seven, and eight, what are they depicting?

1 A So possible blood.

2 Q Okay.

3 A And that is where I would have placed the
4 photo markers and Specialist Levesque would have
5 swabbed for the possible blood.

6 Q All right. So seven, the marker and the
7 measuring stick or whatever.

8 A We call it a scale.

9 Q Scale. Thank you.

10 A Yes.

11 Q Is this taken shortly before this area is
12 swabbed or do you not know exactly when?

13 A I don't remember exactly when. I believe it
14 was, it was not too long before the swabbing was, was
15 done.

16 Q Okay. Nine and ten, same thing?

17 A Yes.

18 Q Possible blood?

19 A Yes. Just different areas.

20 Q Same with eleven and twelve?

21 A Yes.

22 Q Now, I also have -- I think there's 18 photos
23 in the F series. And I know the letter doesn't mean
24 anything to you. But let's --

25 A That was for the -- so that's for the next

1 day. That would be for supplement eleven.

2 Q That's for the next day?

3 A Yes.

4 Q Okay. Yeah, that's right. Yeah, it says the
5 22nd. All right. Okay, let me see.

6 Did you -- was the 21st, was that the same
7 day that you obtained latent prints from the interior
8 door and the exterior door of the electrical room or
9 was that a later day?

10 A No, that was the same day.

11 Q Same day. Okay.

12 A Yes.

13 Q So tell me about that.

14 A So basically once, once photographs are
15 taken, we went ahead and -- well, you go ahead and
16 swab any areas first and then we went ahead and
17 processed that electrical room.

18 Q Okay.

19 A Ashley Levesque and I.

20 Q And, and did you do different things? I mean
21 I understand that you lifted some prints. Right?

22 A Yes. So in my report I list all the areas
23 that, that I processed.

24 Q Right.

25 A And, so various areas in the electrical room

1 including the door, some sticky -- two blue sticky
2 notes. And then it should also list where I got the
3 positive results for, for ridge detail.

4 Q So I'm looking at page four of five. And it
5 says, "I received possible positive results for the
6 ridge detail on the following items areas. Two on
7 exterior door."

8 Is that the exterior door leading into the
9 building or is that --

10 A No. So this is from the, from the
11 electrical room.

12 Q That's exterior on the outside of the room
13 going into the electrical room?

14 A Yes. So it's that electrical door, yes, and
15 the outside of the door. Yes.

16 Q Okay. And then it says, "Twelve on interior
17 door."

18 A Yes.

19 Q So I just want to make sure I understand
20 this. So you list two positive results for ridge
21 detail on the exterior?

22 A Yes.

23 Q And is that, is that the same as sometimes we
24 say latents of value?

25 A No. That would be the, the AFIS division

1 that they go ahead to determine what is of value.

2 So we just go ahead and lift anything that
3 we observe to be possible fingerprints or that has
4 some ridge detail and then we go ahead and submit
5 them and then the AFIS division determines them to
6 be of value or not.

7 Q Okay. And then it says, "12 on the interior
8 door." Same thing?

9 A Yes.

10 Q You lift them, you don't evaluate whether or
11 not they have value or not?

12 A Correct.

13 Q But I mean at the very least you're able to
14 determine that there are sufficient ridge details for
15 it to go on to be further examined I assume?

16 A We are basically trained to lift anything
17 that we see that might be ridge detail. So whether
18 that might be -- so ridge detail we'll just say, like,
19 a line. So if there's, like, two lines or, you know,
20 seven, we go ahead and just lift of whatever we see.

21 Q Okay. And do you document how many lines you
22 would see on each one of these lifts, or no?

23 A No.

24 Q Okay.

25 A No.

1 Q Do you have the ability to photograph what
2 you obtain as far as the ridge details that you obtain?

3 A We photograph only the, like, possible ridge
4 detail that we observe on items that we have processed
5 with, like, Superglue fuming or chemicals.

6 When we go ahead and lift them with the
7 tape, no, they get -- it gets puts onto, like, a
8 white, a white piece of cardboard or paper and it
9 gets taped onto that and then gets submitted to the
10 AFIS division.

11 Q Okay. So for the question of how many unique
12 ridges you identified, you didn't identify any number
13 of ridges, you just lifted it and the latent examiner
14 will --

15 A Yes. If I think that it could possibly be
16 even the tiniest bit of a possible fingerprint, I'll
17 go ahead and lift it.

18 Q Okay. And I, I believe I already know the
19 answer to this, but I'm going to ask you anyway.

20 Did you have any opinions as to whether or
21 not any of the lifts that you lifted had evidentiary
22 value?

23 A Yes. So I would, I would -- yes, some of
24 them appear to be, you know, possible fingerprints.

25 Q Okay.

1 A But, again, yeah, that's not for me to
2 evaluate them. That's for the AFIS division.

3 Q So the -- but fingerprints would have
4 evidentiary value, it's just a question of to what
5 degree?

6 A Yes. Correct.

7 Q Do you know why the electrical room door was
8 processed again by Supervisor Camacho the following
9 day?

10 A I believe they went ahead and expanded the
11 area that was processed.

12 Q Okay. Were there any problems with the
13 collection that you had gathered and what you had
14 obtained?

15 A No, not that I know of.

16 Q Do you have any, any knowledge as to the
17 evidentiary value of the prints collected by Supervisor
18 Camacho the next day?

19 A I do not, no.

20 Q It's my belief that you in -- from the trash
21 in the men's room that you collected 351 napkins. Is
22 that accurate? Or papers.

23 A Yes, that's correct.

24 Q Okay. And could you tell us how many of
25 those 351 napkins had blood on them or possible blood

1 on them.

2 A So basically I kind of separated them. When
3 you look at the report, I put I collected the
4 following items from the scene. And then I did, I did
5 kind of separate it.

6 So the three, the three bloody napkins,
7 the two wads of napkins with possible blood. So,
8 and then there were 43 napkins with possible blood.

9 So I did go ahead and separate them from
10 the ones that didn't appear to have any, any blood.

11 Q So 43, is that what you said?

12 A So it looks like 43, another 3, and another
13 2. So 48.

14 Q Okay. Any other items from the trash can
15 that had possible blood on them?

16 A I believe one of the Ziploc bags which I
17 processed the next day.

18 Q Okay. Would you agree that the blood that we
19 discussed and what we've seen primarily appears to
20 either be droplets or, or fairly small smears?

21 A On some areas. On the bathroom floor
22 basically the -- especially inside the stall, that
23 whole floor area appeared to, to have blood on it.

24 Q Okay. Certainly even in that area it wasn't
25 the type of quantity that was, you know, where you

1 might see pooled up blood that could be quantified in
2 liters and ounces. Would you agree?

3 A No.

4 Q Stick with liters I guess. I mean there
5 wasn't blood there that would be quantified in liters?

6 A No.

7 Q There wasn't any standing blood. There's the
8 surface in the stall that has some discoloration that
9 might be possible blood?

10 A Yes.

11 Q Okay. And then there is some drops in
12 various places?

13 A Yes.

14 Q So if you were going to try to quantify it by
15 volume, would you agree that it would be very difficult
16 to quantify by volume as far as measurements as far as
17 ounces or liters or deciliters or what have you?

18 A Yes, that would be a fair statement.

19 Q Did you participate in the use of Luminol in
20 the bathroom?

21 A I did not, no.

22 Q And did you, did you utilize the
23 phenolphthalein process on any of the blood that you
24 saw?

25 A The phenolphthalein.

1 Q Yes.

2 A I did not in -- on this supplement.

3 Q Okay. Did you the following day?

4 A Yes.

5 Q Okay. All right, why don't we go to -- is
6 there anything else we should discuss on the 21st?

7 A No. Not that I'm aware of.

8 Q Okay. And it looks like you were there
9 pretty much all night.

10 A Yes, we were.

11 Q So when we talk about the next day, are we
12 talking --

13 A I'm meaning basically like my next shift.

14 Q Your next shift.

15 A Yes.

16 Q Which is gonna be -- pull that up. Which is
17 going to be arrival at -- okay. You have arrived at
18 1549 on the 22nd and this call received at 1549.

19 A Yes. So basically it's a -- so I did this
20 at our forensic sciences division at our office.

21 Q Okay.

22 A So basically the -- it's just logging in
23 that information and it's the same time that I
24 inputted it and started the, the follow-up.

25 Q Okay. And would this be when you took those

1 18 photos?

2 A Yes.

3 Q All right. So let's take a look at those.

4 Okay. So are these photos that you took on
5 the October 22nd?

6 A Yes.

7 Q Okay. In the number two what are we looking
8 at?

9 A That was the, like, rope that I found in
10 that attic area of the electrical room.

11 Q Okay. Item four?

12 A It was plastic packaging in the same area.

13 Q Item seven?

14 A So that was a, like, a plastic glove that
15 was found inside electrical room. Not the attic area
16 but in the room itself.

17 Q Ten?

18 A A white cloth that was in the electrical
19 room. And that's the other side of it.

20 Q And this appears to be some stains on there.
21 Anything of significance?

22 A Not that I observed.

23 Q Okay. And then the gloves?

24 A Yes.

25 Q Are those all the photos that you took on

1 that day?

2 A Yes.

3 Q Okay. And it looks like you did touch DNA
4 swabs inside the two Ziploc bags?

5 A Yes.

6 Q How do you do that? Do you circle the entire
7 baggie or on the inside when you do the DNA swab?

8 A Basically I'm just swabbing like that. You
9 know, when you open the Ziploc bag, just like in that
10 interior area right there.

11 Q Okay, all right. Then the swabs that you
12 identified in your report. So it says in here, "The
13 above-following items were tested," it's halfway down
14 the page on page three, "were tested and resulted in
15 positive results for the presence of possible blood."

16 A Yes.

17 Q And that's based on the phenolphthalein kit?

18 A Yes. So the phenolphthalein, what it is,
19 it's a presumptive test for blood.

20 Q Right.

21 A So even though it's indicating that it's,
22 that it's presumed to be blood, it still could be
23 something else. So that's why we go ahead and take a
24 sample.

25 We, we test it to see if it could be blood

1 and if it is then we'll go ahead and submit that
2 swab and that's up to the case agent or the
3 detectives to -- whether they send that in for
4 analysis.

5 Q Is it presumed to be blood or is it
6 presumptive that it, that it may be blood?

7 A It's --

8 Q That it's possible?

9 A Yes, that it's possible blood, yes.

10 Q Okay. But that there could be many other
11 different explanations why you might have a positive
12 presumptive for possible blood other than it being
13 blood?

14 A Yes.

15 Q Okay. Can you identify any of the agents
16 that might test positive as possible blood other than,
17 other than animal blood and --

18 A Sometimes some chemicals. I know, for
19 example, like with Luminol it could be -- it
20 definitely like chemical agents or copper, metals, so.

21 Q Okay. Is that with Luminol and with the
22 phenolphthalein?

23 A Yes. But phenolphthalein is much more
24 specific.

25 Q Okay.

1 A So.

2 Q But it's still just possible blood and then
3 it has to be confirmed by the lab?

4 A Yes. Correct.

5 Q Before you can say it's blood?

6 A Correct. So exactly. So the lab would have
7 to, would have to analyze it and then, you know, give
8 the absolute answer as to whether that's confirmed
9 blood or not.

10 Q So you used the phenolphthalein to process
11 these items that are set forth in -- on page three of
12 your report. Did you also use that at the, at the
13 scene of 15-- what is it, 15- --

14 A I did not -- I didn't, I didn't collect the
15 swabs. So I would have no -- if I'm not collecting
16 the swabs, I wouldn't be using the phenolphthalein
17 test.

18 Q Okay, okay. What about Luminol?

19 A I believe that was Specialist Levesque.

20 Q In your presence or not in your presence?

21 A No, in my presence, yes.

22 Q Okay. I want to make sure that on the items
23 that, that you say you had positive results for the
24 presence of possible blood. Is that from the Ziploc
25 bag number one, the red stain on napkin from bathroom

1 trash can, brown stain on napkin bathroom trash can,
2 and plastic trash bag?

3 A Yes.

4 Q Okay. Any other items that you tested that
5 tested positive?

6 A No. No, sorry, not at that time.

7 Q And it's possible blood because it's
8 presumptive. We discussed that already.

9 A Yes.

10 Q Is -- I think we talked about this. But I
11 think you said that there is a quality control test for
12 the phenol- --

13 A Phenolphthalein, yes.

14 Q Phenolphthalein?

15 A Um-hum.

16 Q Getting tired.

17 A It's a mouthful.

18 Q Yeah. I don't know, whoever came up with
19 that phrase is --

20 A They weren't thinking about it.

21 Q Right. I think you talked about a quality
22 control test that's done. Could you describe how
23 that's done, what you do for the quality control test.

24 A Yes. So before we go ahead and collect an
25 actual sample of, like, whatever evidence that we're

1 going to take a sample from, we have to make sure that
2 the phenol kit, phenolphthalein kit, or phenol for
3 short, so you can call it phenol, the kit that we use
4 is working correctly.

5 So basically what we do in the kit there
6 is a known, a known blood sample, and we'll go ahead
7 and swab that and it's like a three-, a three-step
8 process.

9 And it should if it's working -- if the
10 chemicals are working correctly, it should show us a
11 positive result which is a -- it gives off, like, a
12 pink color.

13 Then we go ahead and do what we call a
14 negative result. So we go ahead and use the same
15 chemicals on a swab that doesn't have any blood.
16 And obviously if it doesn't turn pink, then -- which
17 is what we're wanting, then we know that the
18 chemicals are working.

19 So once we know that the chemicals are
20 working correctly, now we can go ahead and use those
21 chemicals on, on an area on the actual item of
22 evidence.

23 Q Okay. You said pink is what we're wanting.
24 Do you mean to say that that's what you're looking for
25 to see if there's a positive for possible presence of

1 blood?

2 A Yes. So a positive indication of possible
3 blood will give off a -- will give a pink color.

4 Q Okay.

5 A Negative, it's just clear.

6 Q Right. And I'm assuming you're not wanting a
7 particular result going into the process?

8 A Correct. It just it is what it is.

9 Q Right. Okay. You said there was three steps
10 to that process. Could you just briefly describe what
11 those three steps are.

12 A Yes. So I -- like, three liquids in the
13 three separate bottles. The first step is alcohol;
14 the second step is ridges, phenolphthalein, and then
15 the third step is hydrogen peroxide.

16 So basically the alcohol kind of makes the
17 sample more sensitive for the application of the
18 next two steps.

19 Q Okay.

20 A And then the next two steps, the second one,
21 the second one we'll go ahead and -- I'm not very good
22 at chemistry. But basically it takes an oxygen
23 molecule, which means it makes it clear, and then when
24 you apply the third step, which is hydrogen peroxide,
25 it puts back the oxygen molecule and so it should give

1 off that pink color or the positive reaction.

2 Q Okay.

3 A I -- if I suddenly drop out, it's just
4 because my laptop has run out of battery.

5 Q Time?

6 A Yeah. So I'll just switch over to my phone.

7 Q Okay. Sorry.

8 A No, that's okay. It's no problem.

9 Q Okay. Is there a way to tell if it's a -- if
10 the sample that's tested -- what's the short for
11 phenolphthalein? What's the short, phenol?

12 A Phenol.

13 Q Phenol. I like that.

14 A Yes.

15 Q If the substance is a mixture of maybe two
16 different agents that would cause a positive reaction,
17 is there any way to protect as far as that's concerned
18 other than just the ultimate laboratory analysis?

19 A What do you mean by protect?

20 Q Like we know that blood may cause a positive
21 reaction for possible blood. Right?

22 A Yes.

23 Q And we know that there are other agents that
24 may also cause a positive even though it's not blood?

25 A Correct.

1 Q And so if the sample has a mixture of two of
2 those agents or three of those agents, is there a way
3 to decipher and to eliminate I guess the need to send
4 it off to the lab for further testing to confirm what
5 the substance is?

6 A No. Basically if it -- oh.

7 THE COURT REPORTER: I think she might
8 have froze.

9 MR. BRUNVAND: Yeah. Yeah.

10 (Discussion off the record.)

11 A I'm sorry, what was the question again?

12 Q Let me -- I got to turn the recorder back on.
13 Let me just try to remember.

14 MR. BRUNVAND: Tammy, do you know what my
15 last question was?

16 You're muted, Tammy, if --

17 THE COURT REPORTER: I'm looking.

18 MR. BRUNVAND: You're still muted, Tammy.

19 THE COURT REPORTER: Let me -- I'm trying
20 to see.

21 MR. BRUNVAND: It was just --

22 THE COURT REPORTER: I'm hitting the wrong
23 button.

24 A I believe you were asking about the
25 mixtures.

1 Q Right, I asked about the mixture.

2 THE COURT REPORTER: Of those two agents
3 or those -- or three -- or those three agents.

4 A Yeah. So basically if we get what we call a
5 positive result, then we just go ahead and package and
6 submit that into evidence.

7 Q Okay. So, and then the laboratory analysis
8 will then confirm whether or not it's blood or whether
9 it's some other agent that's causing the positive for
10 possible blood reaction?

11 A Yes.

12 Q So if, if the sample is positive for the
13 phenol testing at the crime scene but negative at the
14 laboratory, would that mean that, that it wasn't blood?
15 So the possible blood result would be negated and it
16 would be confirmed not blood. Is that accurate?

17 A Yes, yes.

18 Q All right. Let me see if there's anything
19 else for that particular day.

20 So twelve I think is the next one.

21 A Okay.

22 Q And it starts at 1530 and completed at 1630.
23 And that's just continued processing of evidence that
24 you had obtained?

25 A Yes.

1 Q Okay. Anything to add other than what's in
2 that supplemental report?

3 A No.

4 Q Okay. And the next one is fourteen. And
5 indicates, so this is on March 23rd, you receive a call
6 at 2223 hours, you arrive at 2305 at 511 Seaview Drive.

7 A Yes.

8 Q Who is present when you arrive at 511 Seaview
9 Drive?

10 A There are various people present. You've
11 got various Largo detectives, Tarpon Springs
12 detectives, later on their SWAT team, and then my
13 supervisor and a couple of us specialists.

14 Q Okay. Did someone -- when you arrived there,
15 were you -- it looks like Detective Hunt briefed you on
16 the status of the case?

17 A Yes.

18 Q And then you took a bunch of photos?

19 A Yes. I took photographs of basically the
20 exterior -- the back of the residence.

21 Q Was, was -- had law enforcement already
22 entered the home when you arrived?

23 A No, not yet.

24 Q Okay. So the search had not actually
25 started?

1 A Correct.

2 Q When, when did the search start?

3 A I'm not sure in regards to timing. But
4 basically it was Tarpon Springs SWAT arrived on scene,
5 like I said I'm not sure how long after we arrived,
6 and then they breached the residence.

7 They just -- they went in just to make
8 sure that nobody was inside the residence. And then
9 that's when we proceeded to take photographs and
10 enter the residence.

11 Q Did you, did you hear them announce
12 themselves before they entered the residence?

13 A Yes.

14 Q What were they saying?

15 A I believe they said Tarpon SWAT.

16 Q Okay.

17 A I don't know exactly the words. But the
18 SWAT team did, did announce themselves before they
19 breached.

20 Q How long between the time that they announced
21 until the time when they breached?

22 A It's probably a matter of seconds.

23 Q Okay, all right. And then how long did it
24 take them to clear the house?

25 A I would say not longer than 15 minutes.

1 Q Okay. And was anyone -- did anyone enter the
2 house other than Tarpon Springs at that, at that stage?

3 A No.

4 Q Where are you guys --

5 A Located?

6 Q -- yeah, located prior to, to Tarpon
7 finishing up?

8 A So basically Seaview Drive I believe runs
9 like east to west and then so it kind of curved around
10 to the north I believe and so we were waiting in,
11 like, that north, north area.

12 Q Okay. Around the curve or sort of right on
13 the corner there?

14 A I would say, like, around the curve.

15 Q Okay. And there was you and Largo Police
16 Department detectives?

17 A Yes.

18 Q And then do you recall specifically what
19 detectives were present?

20 A No, I don't recall.

21 Q Okay.

22 A I'm not very good with names.

23 Q And who was there as far as the forensic
24 team?

25 A So it was my supervisor D'Jimas and

1 Specialist Zuchetto and my specialist recruit Webster.

2 Q Okay. Looks like I have these opposite
3 direction here.

4 So I'm looking at what I believe is the first
5 photo in the series that you took. And I say that
6 because I have the M59101. That's your number, right?

7 A Yes.

8 Q Okay. So this first photo -- the photo
9 before is the one that just identifies you as the
10 photographer. This first photo, are they taken prior
11 to the SWAT team finishing up or after?

12 A No, this -- no, this was after.

13 Q Okay. Had you heard a reading of the search
14 warrant by anyone before you entered with the rest of
15 the people?

16 A No, I don't recall.

17 Q Okay. And do you recall who was searching
18 the house?

19 A So it was Tarpon Springs. I know it was
20 Tarpon Springs, also P.D., some detectives I believe
21 from there, and Largo. So it was a collaboration.

22 Q Okay. Did anyone seem to take the lead on,
23 on the search?

24 A So it was, it was Largo. So basically they
25 were directing everybody as to where they wanted, you

1 know, everybody to go, what they wanted photographed
2 and collected.

3 Q Okay. So the first ten or so photos appear
4 to be -- 14, 15, they all appear to be from outside the
5 residence?

6 A Yes.

7 Q Okay. Did you circle around the residence or
8 do you go around the residence and get to the back of
9 the residence?

10 A No; it was, it was going around it.

11 Q On the outside?

12 A Yes. So the photographs of, like, me going
13 towards, like, the right-hand side and then I think I
14 basically then moved, like, towards the left and then
15 went around that way.

16 Q Okay. So, for example, 24 appears to be on
17 the north side of the residence, bordering on the north
18 side?

19 A So if you're looking straight at the
20 residence, it's towards the right-hand side.

21 Q Right. Right. Wouldn't that be the north
22 side?

23 A I believe that would be the west side. Is
24 it not?

25 Q I think the residence is facing the gulf,

1 right. So --

2 A See, I'm thinking that the residence -- I'm
3 thinking the side facing the gulf is the south side.
4 But it may not be. I may be turned around.

5 Q Okay, all right. Well, this would be --
6 let's just stick with right and left then.

7 A Yes.

8 Q So this -- as you're facing the residence
9 from the street, this would be to the right of the
10 residence?

11 A Yes.

12 Q Okay. And the metadata on these photos would
13 give us a good idea of the time that you were outside
14 the house and then it appears that 33, 34, 35 you are
15 getting ready to possibly enter the house. Or maybe
16 not quite yet.

17 A So, like, for example, this photograph is
18 just me leading towards that second floor area, like
19 the upper deck and then my --

20 Q Right.

21 A -- and then my photographs concluded. That
22 was the end of my photographs. Specialist Webster
23 took interior photographs of the residence.

24 Q Right. So you don't do any interior
25 photographs?

1 A No.

2 Q Okay.

3 A Just of, like, the, the lanai, the pool
4 area.

5 Q Okay.

6 A Yes.

7 Q All right. Well, it looks like you took some
8 inside the garage.

9 A But that was just from the outside. So I
10 can -- so even though I'm from the doorway and I can
11 zoom in. But I didn't actually -- but, yeah, I didn't
12 actually take any further photographs of, I say
13 gaa-rage. But, yes, garage.

14 Q Gaa-rage, huh.

15 A The gaa-rage, yes.

16 Q All right. Stop that.

17 Did you apply Luminol to the garage floor at
18 511 Seaview?

19 A I did not. That was Specialist Zuchetto and
20 Webster.

21 Q Okay. And do you know from being there what
22 the results were of that Luminol application?

23 A I believe there was some positive areas
24 again for the presence of possible blood.

25 Q Did you see it or were you told that that --

1 A No, I observed it.

2 Q Okay, all right. Do you know if a quality
3 control test was performed prior to applying the
4 Luminol?

5 A Yes.

6 Q Okay. Did you witness that or were you told?

7 A That I don't recall.

8 Q Okay. And how is, how is that done?

9 A For the Luminol?

10 Q Yes.

11 A So basically the way that -- well, actually,
12 no, I apologize, I did observe it. The way that we,
13 that we test it if it does work is, like I said
14 before, Luminol reacts with, with certain metals.

15 So we use a copper penny and we go ahead
16 and spray that copper penny with the Luminol and if
17 we see, if we see what we call it luminescing, so it
18 glowing, that blue glow --

19 Q Right.

20 A -- then we know that the chemicals are
21 working.

22 And then basically moving forward any kind
23 of luminescence or glowing that is observed it gets
24 photographed but it also gets, it also gets tested
25 then with that, with phenol.

1 Q Okay. Do you know if the areas that were
2 positive from the Luminol were further tested with the
3 phenol in this case?

4 A Yes, I observed that.

5 Q Okay. And what were the results of that?

6 A I believe they were areas of positive
7 results. But you'd have to refer to -- I'm not sure
8 if it's Zuchetto or Webster's report for that.

9 Q Okay. And even if there was a positive
10 result, the ultimate decision as to whether or not it
11 was blood or not would be determined in the laboratory?

12 A Correct.

13 Q I don't know that I asked you who, who had --
14 but -- given you the status of the case, which I
15 believe is Detective Hunt with Largo. But I don't know
16 that I asked you what he told you as far as what the
17 status was at that time.

18 Could you tell us what he told you at the
19 beginning of when you arrived at 511.

20 A Basically, from what I recall, he told us
21 that obviously they were conducting a search warrant,
22 it had something to do with, with the -- a truck that
23 they, that they had somehow, you'd have to ask them,
24 figured out that, that it was possibly inside this
25 residence.

1 Q Okay. Do you recall --

2 A And --

3 Q Do you recall specifically what was said
4 about the truck?

5 A Not specifically. But in general that, that
6 there was a specific truck that was observed through
7 video surveillance at the, at the law office parking
8 lot and then through detective work they somehow
9 linked it back to, to going to this residence.

10 Q And this information, do you believe that was
11 provided by Detective Hunt?

12 A Yes.

13 Q And was that provided by Detective Hunt
14 almost immediately upon your arrival at 511 Seaview?

15 A I don't know about immediately, but I mean
16 definitely within 20 minutes of us arriving.

17 Q Okay. Do you recall any conversations about
18 Tomasz Kosowski having purchased or the subject of the
19 investigation having recently purchased a truck?

20 A No, I don't recall that.

21 Q Okay. You had indicated earlier that Largo
22 P.D. detectives were directing Tarpon Springs
23 detectives, from what you could tell, during the search
24 within and around 511 Seaview.

25 A Yes.

1 Q Okay. Could you elaborate on that a little
2 bit.

3 A I'm not really sure as to why that there
4 was -- you'd have to ask the state attorney as to the
5 reason behind that. Some kind of jurisdiction thing.

6 So, yeah, I'm not really sure why both of
7 them, both of them were there.

8 Q Okay. So I'm more interested in what you saw
9 as far as what law enforcement was doing in your
10 presence, Largo versus Tarpon Springs, not so much what
11 it means and why they were doing it.

12 A Oh, okay. Well, Largo P.D. was directing
13 and, and Tarpon Springs P.D. they were, they were
14 moving items of evidence or moving items inside the
15 residence.

16 Q Okay. Did you see anyone from Largo P.D.
17 moving or collecting evidence during the search?

18 A No, not in my presence.

19 Q Okay. Did there appear to be anyone in the
20 residence that possibly looked out of place and
21 possibly were not members of the law enforcement?

22 A No, not that I recall.

23 Q How do you discern the difference between the
24 Largo Police detectives and the Tarpon Springs Police
25 detectives?

1 A We are pretty familiar with, with the
2 detectives. Like I told you, I'm terrible with names,
3 so. But the -- like, in uniform or the detectives,
4 they're wearing a polo shirt, or we just know them
5 from previous cases.

6 Q Okay. Do you recall whether or not they had
7 broken the Tarpon Springs Police Department into teams
8 searching different parts of the house?

9 A I don't know about if they were specifically
10 broken down into teams. I know that there was just a
11 lot of people. There were a lot of people at the
12 scene.

13 Q Okay. How long would you say the search took
14 from beginning to end? It looks like you were there
15 until --

16 A Until 6- --

17 Q -- 6:37 in the morning.

18 A Yes. So basically I was there about just
19 over eight hours.

20 Q Okay. And the search took place most of the
21 time?

22 A Yes.

23 Q Most of the time during that time period?

24 A Yes.

25 Q Okay. Did you witness, did you witness any

1 of the Largo P.D. searching through any of the contents
2 of closets, drawers, suitcases, handling guns, or
3 anything like that in the garage?

4 A I don't recall me seeing them physically do.
5 I know that they were, again, directing Tarpon P.D.
6 officers or detectives to, to do it for them.

7 Q Can you name any of the Tarpon Springs Police
8 Department individuals who participated in the search
9 of the content of 511 Seaview?

10 A The only one I remember off the top of my
11 head was Detective Duval (phonetic spelling).

12 Q Okay. Do you recognize others but you don't
13 remember their names, or?

14 A Yes, correct.

15 Q You're familiar with Detective Bolton and
16 Detective Hunt, right?

17 A Yes.

18 Q They were both there?

19 A Yes.

20 Q Did you notice if they wore any type of
21 shoe -- protective shoe covers when they were walking
22 in the garage?

23 A I don't believe so, no.

24 Q I'm gonna -- give me one second here.

25 A Sure.

1 Q This is -- it's the body cam from one of the
2 Tarpon Springs officers, and I can't remember exactly
3 who right now. But it's TS237723, slash, 00, dash, 1D,
4 dash, 96, dash, 1C6B, dash, F2. Just -- and I'm gonna
5 go to approximately 2112 into this recording.

6 Are you able to see the recording?

7 A Yes. So right now stopped at the truck.

8 Q Right. And the woman who's standing there to
9 the left in the image, do you recognize her?

10 A Yes. That's Specialist Webster.

11 Q Specialist Webster. Okay. I'm gonna start
12 it. And we got about 30 seconds. I'm at 20 seconds,
13 25 seconds to go.

14 (Body camera footage published to the
15 witness, transcribed as follows to the best of my
16 ability.)

17 "These are the keys that I took off a ring that
18 was right inside that door that allowed me to unlock
19 the tonneau cover.

20 (Indecipherable.)

21 Yes, it was locked. So your supervisor told
22 me to put those on the hood. So that's where I".

23 (Publication paused.)

24 Q Do you know who's talking?

25 A I believe that might be Detective Hunt.

1 Q Okay, all right.

2 (Publication resumed.)

3 "Okay.

4 Okay. And we'll obviously have to collect
5 those."

6 (Publication paused.)

7 A Don't quote me on that though. Assuming.

8 (Publication resumed.)

9 "So did I hear you correctly that he just
10 bought this car?"

11 (Publication paused.)

12 Q So that's, that's you, right?

13 A It is, yes.

14 Q And you're saying, "Did I hear this correctly
15 that", and let me hear again because I can't remember
16 if you mentioned a name.

17 A Something about buying the car?

18 Q Yeah, yeah.

19 A Okay.

20 Q I'll play it again. Oops.

21 (Publication resumed.)

22 "So did I hear correctly that
23 (indecipherable) just bought this car?

24 Like two weeks ago.

25 I don't know."

1 (Publication paused.)

2 Q So, so you said did I hear correctly that he
3 just bought this car, right?

4 A Correct?

5 Q And does that refresh your memory about where
6 you might have gotten that information from?

7 A If I had gotten that information, it would
8 have been sometime during the time that we were, that
9 we were at the residence.

10 Q Okay.

11 A I, yeah, I didn't even recall that.

12 Q So possibly from Hunt when he's giving you
13 the debriefing? Or you just don't know?

14 A I honestly couldn't tell you now.

15 Q Okay. And then the other person -- I believe
16 the woman who's standing in the center of the image is
17 taking photos it looks like said something to the
18 effect of two weeks ago. Who is that?

19 A Webster.

20 Q That's Webster. Okay.

21 A Yes.

22 Q All right. Anything else about 511 Seaview
23 that you think we need to talk about?

24 A No.

25 Q Okay. You're not sitting there saying, my

1 gosh, I can't believe he didn't ask me this?

2 A No.

3 Q Okay.

4 A Pretty self-explanatory in the, in the
5 report.

6 Q All right. So I think the last report is
7 supplement 25.

8 A Yes.

9 Q And that's 3/26 received a call at 24 minutes
10 past midnight, arrived at 31 minutes past midnight,
11 completed at 4:30 a.m. and you are at the 444 south
12 Huey Avenue, Tarpon Springs Police Department.

13 A Yes.

14 Q All right. And, again, you have contact with
15 Detective Hunt and you take -- and you have contact
16 with Tom Kosowski?

17 A Yes.

18 Q Okay. And you photograph Tom Kosowski
19 pursuant to a body warrant?

20 A Again, I don't recall -- yeah, I don't
21 recall that.

22 Q Okay.

23 A But I photographed him at the direction of
24 Detective Hunt.

25 Q Okay, all right. And you photographed some

1 injuries that I think you have described in your
2 report.

3 A Yes.

4 Q Red mark to the left side of his neck, red
5 mark to the front of his neck, and so forth.

6 A Yes.

7 Q Other than identifying these injuries, do the
8 injuries that you witnessed, did they, did they have
9 any significance to you as far as evidentiary
10 significance or do you have any thoughts on how they
11 may have happened or what may have caused them?

12 A No. We're just trained to, again, to just
13 photograph and document any- -- anything that we
14 observe. Whether they're there prior to the incident
15 or not or how they got there, we, we don't do anything
16 with that. It's, like I said, it's just photographing
17 and documentation and processing of it.

18 Q Okay. Do you know how many photos you took?

19 A On this one it was 261.

20 Q Okay. For some reason I have 239, but.

21 A That may be -- it could possibly be
22 photographs at the scene and then the extra ones were
23 photographs on the -- from the bench camera that I
24 took back at the office.

25 Q Okay.

1 A So that may be why you're seeing a
2 difference. But in total I took 261 photographs.

3 Q I'm going to try to pull them all up at one
4 time. Hopefully I won't crash.

5 Okay. So these are the photos, right?

6 A Yes.

7 Q As far as what you described as far as his
8 neck and what have you, photos sort of speak for
9 themself. Would you agree?

10 A Yes.

11 Q See now it appears to have froze up just the
12 way I didn't want it to. I'm looking for the ones with
13 the hands. Okay.

14 Is he handcuffed the whole time or do you
15 take photos from -- so that would be his right hand,
16 right, in 23?

17 A Yes.

18 Q Okay. Do you have any opinions about or is
19 it beyond your expertise as far as whether or not
20 that's an injury that's seemed like it's healed for
21 quite some time?

22 A No, I would have no opinion. I mean
23 everybody heals at different -- you know, differently,
24 so.

25 Q Okay. But that would, that would not

1 necessarily be something that would be within your area
2 of expertise?

3 A Correct.

4 Q And what about any thoughts or speculation as
5 to how the injuries occurred?

6 A Oh, that -- no, I have no opinion about that
7 either.

8 Q Okay, all right. And would it be true as to
9 all the injury photos as far as the state of healing
10 and, and the cause of the injuries, that would be all
11 beyond anything that you would be qualified to testify
12 about?

13 A Correct.

14 MR. BRUNVAND: Okay. I think, I think
15 that's all I have.

16 Amanda, Willengy, do you guys have any
17 questions?

18 MS. RAMOS WICKS: I don't have any
19 questions.

20 MS. SELLERS: I don't have anything.

21 MR. VONDERHEIDE: I don't have any
22 questions either.

23 MS. SPADARO: No questions from me either.

24 MR. BRUNVAND: All right. Do you want to
25 read or waive?

1 THE WITNESS: Read please.

2 (The deposition was concluded at 4:44 p.m.)

ERRATA SHEET

DO NOT WRITE ON TRANSCRIPT -- ENTER CHANGES HERE

IN RE: STATE OF FLORIDA VERSUS TOMASZ KOSOWSKI

DATE TAKEN: DECEMBER 6, 2023

REPORTER: TAMMY KELLEY

PAGE NO.	LINE NO.	CHANGE	REASON
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Under penalties of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

SANDRA-LEIGH COPELAND

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF POLK)

I, the undersigned authority, certify that
SANDRA-LEIGH COPELAND virtually appeared before me and was
duly sworn.

WITNESS my hand and official seal this 8th
day of January 2025.

TAMMY KELLEY
NOTARY PUBLIC - STATE OF FLORIDA
MY COMMISSION NO. HH 216644
EXPIRES: 02/07/26



1 REPORTER'S DEPOSITION CERTIFICATE

2
3 STATE OF FLORIDA)4 COUNTY OF POLK)
5

6 I, TAMMY KELLEY, certify that I was authorized to
7 and did stenographically report the virtual deposition of
8 SANDRA-LEIGH COPELAND, that a view of the transcript was
9 requested and that the transcript is a true and complete
10 record of my stenographic notes.

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

17 DATED this 8th day of January 2025.

18 
19

20 TAMMY KELLEY
21
22
23
24
25

January 8, 2025

Ms. Copeland
scopeland@pcsonet.com

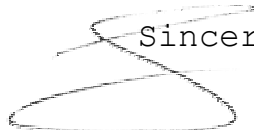
Dear Ms. Copeland:

Your deposition taken in State of Florida versus Tomasz Kosowski on December 6, 2023, has been transcribed. Per your request to review the transcript, it is being held at our office at 728 South New York Avenue, Lakeland, Florida.

Please call (863)500-3603 to make arrangements to do this during our regular business hours of 8:30 a.m. to 5:00 p.m.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Tammy Kelley', written over the word 'Sincerely,'.

Tammy Kelley