

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

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO. 23-02935CF

TOMASZ KOSOWSKI,

Defendant.

_____/

VIRTUAL DEPOSITION OF ROBERT BRIGGS

DATE: December 6, 2023

TIME: 9:34 a.m.

PLACE: Various Remote Locations
Via Zoom Video Communications

TRANSCRIBED BY
REPORTER:

KIMBERLY L. RENFROE, RPR
Stenographic Reporter

VIRTUAL
APPEARANCES:

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ALEXANDRA G. SPADARO, ESQUIRE
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For the State

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Clearwater, Florida 33756
For the Defendant

AMANDA POWERS SELLERS, ESQUIRE
Amanda Powers Sellers, P.A.
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For the Defendant

ALSO PRESENT:

Kimberly G. Kittrell, Notary
Virtual Monitor

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1 DEPOSITION IN DISCOVERY

2 ROBERT BRIGGS

3 Pursuant to notice duly given, the virtual
4 deposition of ROBERT BRIGGS, called by the Defendant in
5 the above-styled cause, was recorded by Kimberly G.
6 Kittrell, a Notary Public in and for the State of
7 Florida at Large, at the time and place and in the
8 virtual presence of counsel enumerated on Page 2 hereof.

9 Thereupon, it was stipulated and agreed by and
10 between the attorneys for the respective parties, by and
11 with the consent of the said ROBERT BRIGGS, that
12 signature to the said deposition be reserved.

13 THE NOTARY: And if you'll raise your right
14 hand, please.

15 THE WITNESS: All righty.

16 THE NOTARY: Do you swear or affirm that the
17 testimony you're about to give will be the truth so
18 help you God?

19 THE WITNESS: I do.

20 ROBERT BRIGGS, having been first duly sworn via
21 Zoom Video Communications, upon interrogation in
22 discovery, testified as follows:

23 DIRECT EXAMINATION

24 BY MR. BRUNVAND:

25 Q. Good morning.

1 A. Good morning.

2 Q. My name is Bjorn Brunvand. Present with me,
3 also via Zoom, is Amanda Sellers, and we represent
4 Tomasz Kosowski. Present for the State is
5 Nathan Vonderheide.

6 Could you please state your name?

7 A. Robert Briggs.

8 Q. And could you also tell us your -- your title?

9 A. I'm a forensic science specialist for Pinellas
10 County Sheriff's Office.

11 Q. All right. And how long have you been a
12 forensic science specialist with the -- with the
13 Pinellas County Sheriff's Office?

14 A. Twenty-five years.

15 Q. All right. And any prior law enforcement
16 experience prior to that?

17 A. No, sir.

18 Q. The -- did you go to like an academy before
19 becoming a forensic science specialist?

20 A. I have a associate's degree in criminal
21 justice and I went to the -- the Safety College. When I
22 went, it was the Crime Scene Certificate Program.

23 Q. Okay.

24 A. Now they -- they've changed it. They have a
25 certificate program, they have a degree program. They

1 have a few different things going on. But when I went
2 it was a certificate program.

3 Q. All right. And -- and then, presumably, you
4 were able to obtain your certificate and then get a job
5 with the sheriff.

6 A. Yes, sir.

7 Q. All right.

8 And during the time that you work with the Pinellas
9 County Sheriff as it relates to -- to crime scenes, have
10 you developed any type of specialties?

11 A. I've been trained in several but I -- I'm not
12 a expert in anything in particular but I've taken
13 classes in advanced blood spain -- blood spatter
14 analysis, shooting reconstruction, crime scene
15 reconstruction, advanced processing techniques of the
16 dry and chemical.

17 Q. Okay. And what kind of work do you generally
18 do on a daily basis as a crime scene specialist?

19 A. I respond to a variety of crime scenes and
20 document, collect, and process any evidence from those
21 crime scenes.

22 Q. Okay.

23 I want to go through some reports that I have and
24 confirm that you have the same reports. So if -- if we
25 could do that. The first report that I have is a

1 three-page report. It is -- you probably don't have the
2 Bates stamp numbers on -- on yours; right?

3 A. Meaning --

4 Q. You --

5 A. I just have -- I just have the -- the report
6 number itself. And then I've got --

7 Q. Okay.

8 A. -- three other supplements.

9 Q. Okay.

10 So the first one I want to talk -- want to confirm
11 that we -- that we both have is a three-page supplement.
12 It has time -- the report status date is 3/26 and the
13 narrative portion on Page 2 starts with: I was
14 dispatched to the location of 1501 South Belcher Road,
15 Unit B.

16 A. Yes, sir.

17 Q. Do you have that?

18 A. Yes, sir.

19 Q. Okay.

20 The second one I have -- and -- and by the way, the
21 one that we just discussed, I have Bates numbers on
22 there and I'm not sure if my office put those on there
23 or if the State Attorney's Office did, but -- but -- but
24 my Bates stamp numbers are 2, 3, and 4 as it relates to
25 that one.

1 The second one I have is a four-page supplement.
2 It's -- has a report status date of 4/4/23, the
3 narrative starts on Page 2. It says on this date I
4 responded to the Forensic Science Division Vehicle
5 Processing Garage along with Supervisor Stropes and
6 Assistant Supervisor Klein to process a gray Toy --
7 Toyota Tundra.

8 A. Yes, sir.

9 Do your -- do your reports have supplement numbers
10 at the top of them?

11 Q. Yes. That one --

12 A. Okay.

13 Q. Well, I take -- I take that back. The first
14 one does not but --

15 A. Right.

16 Q. -- this one does.

17 A. That's the -- that's the initial report. And
18 then there should be a Supplement --

19 Q. Twenty-one?

20 A. -- 23, 28, and 35.

21 Q. Twenty-eight is a three-page report?

22 A. Yes.

23 Q. And 35 is a four-page report?

24 A. Yes, sir.

25 Q. Okay. And have you -- prior to finalizing

1 those reports and also prior to these depositions, have
2 you reviewed those reports for accuracy?

3 A. Yes, I have.

4 Q. And have you reviewed them for completeness?

5 A. Yes, sir.

6 Q. And when I say reviewed them for completeness,
7 meaning, is there anything of evidentiary significance
8 that you did that's not discussed in the reports?

9 A. No, sir.

10 Q. Okay. And as it relates to the accuracy, I'm
11 not talking about minor typographical errors, but
12 everything of -- of significant substance is accurate;
13 is that a fair statement?

14 A. Yes, sir.

15 Q. Okay.

16 The -- the first report, I assume, details what you
17 did on March 21st, 2023; is that correct?

18 A. Yes, sir.

19 Q. All right. It indicates that upon arrival we
20 were advised that the victim Steven Cozzi was missing
21 under suspicious circumstances.

22 Could you elaborate on who is it that -- that
23 updated you and provided that information to you?

24 A. That was Detective Bolton with the Largo
25 Police Department.

1 Q. Okay.

2 And, specifically, the -- beyond what's in that one
3 paragraph, do you recall anything else that
4 Detective Bolton told you as far as background on this
5 particular case?

6 A. Nothing other than what's reflected in my
7 report that he'd arrived at work that day and at -- at
8 some point went to the restroom and that was pretty much
9 the last that anybody had seen or heard from him that
10 day.

11 Q. Okay.

12 It appears that at that point you are tasked with
13 starting to -- to -- to take photographs.

14 A. Yes, sir.

15 Q. What -- what time did you arrive at the
16 location?

17 A. Let me make sure I have that.

18 1629 hours, which would be, basically, 4:30 in the
19 afternoon.

20 Q. Okay. So when --

21 A. I'm sorry. I'm sorry. That was the dispatch
22 time. I arrived at like 1643. About 1645.

23 Q. 4:45?

24 A. Yeah.

25 Q. Okay.

1 And then it looks like -- it says completed at
2 2006, which is six minutes past 8:00 o'clock in the
3 evening. Is that when you left the scene?

4 A. Yes, sir. My lieutenant, who responded to the
5 scene later, he called in our evening-shift people to
6 take over responsibility at that point.

7 We work 12-hour shifts and I work 7:00 to 7:00 so
8 the other shift starts at 7:00, so in order to have
9 fresh people on the scene, he called the evening shift
10 people in. We basically waited until they came and --
11 and took over from us. So that's why I left a
12 8:00 o'clock.

13 Q. Okay. All right.

14 When it says I was tasked with photographing the
15 following, who is it that tasked you with -- with
16 photographing the items that were set forth?

17 A. Supervisor Kristen Stropes.

18 Q. Okay.

19 I want to take a look at -- at -- at the photos
20 and -- and I'm going to share the screen, so hopefully
21 you guys can see.

22 Let's see here. Hold on one second.

23 All right. So I have a set of photos that are
24 labeled A-54514 and then the first one starts 0033,
25 which I believe are a series of photos that you took.

1 A. Yes, sir.

2 Q. Is that accurate?

3 A. Yes, sir.

4 Q. Okay. And, specifically, I -- I say that
5 because it appears that the first photo has what appears
6 to be your name. Do -- are you able to see that?

7 A. Yes.

8 Q. Okay.

9 A. Well, I can see the -- it's -- since it's got
10 my payroll number on it -- I can't really see the photo
11 because the thumbnails are really small on my side,
12 but --

13 Q. Let me ask you, does this help? No?

14 A. No.

15 Q. Let me see if I can figure out how to do this
16 with more efficiency, 'cause I do need to go through
17 some of these photos. Let's see here.

18 MR. VONDERHEIDE: You can pull up each
19 individual photo -- there you --

20 Q. (By Mr. Brunvand) There. Is that bet -- does
21 that work?

22 A. That works.

23 Q. Okay.

24 So the -- when I -- when I'm looking at -- at this
25 series of photos, there's a total of, by my

1 calculations, 307 photos in this series, and for some
2 reason they start at 33 and -- and go through 339.

3 Can you explain, first of all, how is -- how is
4 this sequencing -- or how do you -- how do you decide
5 how the -- how these are labeled? It appears that
6 they're -- they start out with an A, then they go to B
7 and C. How does that work?

8 A. When we take photos that -- the first photo
9 you saw there is the photo on my notepad, which
10 basically has the case number, the address I was
11 dispatched to.

12 Q. Right.

13 A. And then there was probably a case I worked
14 earlier in the day where I took maybe one or -- I -- I
15 don't know if I worked one or two other calls that day;
16 that may have been Photos 1 through 32. And that just
17 happens to be Number 33 on my photo disk for that day.

18 So it would start with Number 33, so when our photo
19 lab downloads the photos, that's where it starts.

20 Q. Okay. All right.

21 So it doesn't --

22 A. Can --

23 Q. It doesn't --

24 A. -- can you put the photo back up for me?

25 Q. Yeah. Let's see here.

1 You able to see it?

2 A. Yes.

3 Q. Okay.

4 A. Yeah, because there's going to be another
5 series of photos that somebody else took that's probably
6 going to have a B at the beginning of them, and that
7 would be the second group of photos that our photo lab
8 downloaded.

9 Q. Right.

10 A. Theirs would start with whatever number, but
11 it would say B, and then their payroll number, and then
12 whatever photo number.

13 Q. So -- right. So -- so there is. And --
14 and -- and -- but -- but from what I can tell, for
15 example, King --

16 A. Uh-huh.

17 Q. -- is the next one and starts with a B and --
18 and -- but what's the -- the -- the -- the 54514 number,
19 what does that signify?

20 A. That's my payroll number for the agency.

21 Q. Perfect. Okay.

22 So any -- any folder that has the 54514 number, we
23 then would know that that's you.

24 A. Correct.

25 Q. Okay.

1 And the fact that -- I think you already answered
2 this; but the fact that it starts at 33 does not mean
3 that you took photos and deleted photos.

4 A. Correct.

5 Q. And would you be able to look through your
6 records and determine, you know, what case the other 33
7 pho -- 32 photos were for? I mean, that -- is that
8 something you're able to do?

9 A. I can't do that right now in the middle of
10 this, but I -- that's something that can be done, yes.

11 Q. Okay.

12 So if -- if after we're done, if -- if you were to
13 do that and -- and then email Mr. Vonderheide and just
14 say this is the unrelated case that I was working on
15 earlier in the day as it relates to those missing 32
16 images, I would appreciate that.

17 A. All righty.

18 Q. Okay. Let me -- I'm going to exit out of this
19 again. Hopefully I'll get better at this sharing
20 aspect.

21 So, the first -- and -- and let's just look at the
22 next photo. In fact, I -- what I'm going to do is I'm
23 going to try to put them in a preview so that we can
24 look at several at a time.

25 A. Okay.

1 Q. Okay.

2 And I'm going to try to share again.

3 Okay. Are you able to see -- this -- this appears
4 to be the first photo that -- that you took -- or
5 actually the second photo that you -- no, the first --
6 the -- the first real photo, other than the one that
7 identifies you as the photographer; right?

8 A. Correct.

9 Q. Okay.

10 And what are we looking at here?

11 A. That's the corner of the --

12 Q. This is Number 34.

13 A. Yeah.

14 So that's the corner of the building from the
15 parking lot. That just basically shows the address,
16 unit number of the -- of the building.

17 Q. Are we -- are we looking north, are we looking
18 east --

19 A. That's -- that's looking north. I'm standing
20 like at the south corner.

21 In front of those two black vehicles parked along
22 the curb --

23 Q. Right.

24 A. -- and the -- you see like a gray SUV ahead of
25 that?

1 Q. Yes.

2 A. It should be the -- I -- I believe that's the
3 walkway that goes in between the buildings to go to the
4 entrance of the office building.

5 Q. Okay. And so to your left would be Belcher
6 Road.

7 A. Correct.

8 Q. All right.

9 And then it looks like you take a series of photos,
10 some a little closer up, and you're basically just
11 documenting the outside of the building?

12 A. It's the outside and the overall parking lot.

13 Q. Okay. And -- and do you -- do you end up
14 walking around the entire building?

15 A. Yes, sir.

16 Q. Do you -- do you check any of the doors to
17 the -- to -- to the building or -- or is that not part
18 of your duties?

19 A. That's not part of my duty.

20 Q. All right.

21 And as I'm scanning through these photos, are you
22 able to see what we're looking at?

23 A. Yes, sir.

24 Q. All right.

25 As it relates to the photographs from outside the

1 building, -- well, let's see. This photo here is
2 Number 63, what are we looking at here?

3 A. Those were three vehicles parked in the
4 southeast corner of the parking lot. One of them, I was
5 advised, was Mr. Cozzi's vehicle.

6 Q. Okay.

7 A. The -- the silver Honda there in the middle.

8 Q. Okay.

9 And do you remember who advised you that?

10 A. That was either Detective Bolton or
11 Detective Allred. I don't remember exactly which one.

12 Q. All right.

13 And so I assume that's the reason, then, the
14 following photos are closeups of the vehicle that's
15 believed to be Mr. Cozzi's vehicle; correct?

16 A. Yes, sir.

17 Q. What's the purpose -- I'm looking here at 68,
18 which appears to be a closeup of -- of a doorhandle.

19 Is that the driver's side door or can you tell?

20 A. That's the driver's side.

21 Q. All right.

22 Anything unusual about this or any reason why this
23 photo was taken?

24 A. It was just a photo of the driver's side
25 doorhandle and lock to -- just to show that the lock

1 hadn't been tampered with or anything like that.

2 Q. All right.

3 So, basically, to indicate that there doesn't
4 appear to be any type of tampering with the vehicle?

5 A. Yeah. Like for any type of vehicles, like if
6 they were stolen vehicles or vehicle burglaries, we
7 always photograph the doorhandles and locks to show
8 whether they've been tampered with or not.

9 Q. Okay.

10 Are you receiving instructions as you're walking
11 around? Is -- is someone accompanying you or are you
12 doing it by yourself primarily?

13 A. I'm by myself.

14 Q. Okay.

15 When you're walking around and taking photos, are
16 you looking for any other type of -- of -- of evidence
17 as far as indications of blood or -- or, you know,
18 anything like that?

19 A. Not particularly. When I'm going over --
20 taking the overall photos, generally, before overall
21 photos we walk through the scene in an attempt to
22 identify anything that might be evidence of any
23 evidentiary value, so we'd make sure that we would
24 document that in the overall photos. But --

25 Q. Okay.

1 A. -- anything that might come to me while
2 walking around, absolutely.

3 Q. Have -- so would it be fair to say that if --
4 as you're walking around, if you spotted an area where
5 you thought there was blood that you would most likely
6 document that and photograph it?

7 A. Yes, sir.

8 Q. Okay.

9 Do you recall whether or not you spotted blood
10 anywhere outside the build -- the building -- or what
11 you -- what you -- what you believed was -- was -- was
12 blood?

13 A. No, I did not.

14 Q. Okay.

15 Did someone advise you of the location of -- of --
16 of any suspicious vehicles, you know, as to where they
17 had been seen or anything like that?

18 A. At this time, I don't recall being told
19 anything like that.

20 Q. Okay.

21 What -- I'm looking -- now we're looking at 92 and
22 which angle is this? Where -- where are you standing
23 and -- and which direction are looking?

24 A. This is the back side of the building, east
25 side of the parking lot. That corner there, you're

1 starting to see the walkway but -- for the building that
2 leads like to the -- the parking lot along Belcher Road.

3 Q. Okay.

4 A. And if you would pan to the right of that
5 photo, the next building over was like the
6 veterinarian's office and there's some bushes and stuff
7 in between there and -- and then there's the next
8 building over.

9 Q. So do you know whether or not this building is
10 what's referred to as Building A or you're not sure?

11 A. This is Building B.

12 Q. Building B, okay.

13 A. The same one I started at the beginning of.

14 Q. Okay. Building A, is that the one that's
15 further to the north?

16 A. Yes, sir; I believe so.

17 Q. Okay. And there appears to be an opening
18 halfway down this walkway to the left; is that the
19 entryway to the building, or one of the entryways to the
20 building?

21 A. From this angle I -- I can't be sure where --
22 what that is in relation. I know there's an opening
23 along there someplace, but you'll be able to see it
24 better as we go through the photos.

25 Q. Okay. On 99, that's a different angle; right?

1 Where -- what are we looking at here?

2 A. That is pretty much from the same location in
3 the other photo, it's just a little more to the right,
4 and that's the back corner of what we said was
5 Building A, I think.

6 Q. Building A?

7 A. The --

8 Q. Okay.

9 A. -- veterinarian's office. That just shows the
10 walkway along there and the cameras on that building.

11 Q. Okay. All right. And that's 99.

12 I'm going to exit out of this group of photos and
13 pull up some additional photos.

14 I'm going to try to do -- I can't do them all at
15 one time because it'll probably freeze up my computer,
16 so I'm going to try to do a hundred at a time and then
17 we'll scan through them.

18 So the beginning of this is -- is 101. And if you
19 can tell us where this is, which building it is and what
20 direction you're looking at this point.

21 A. That's the -- the walkway behind Building B.
22 You can see that same Jeep in the previous set of
23 photos. That's --

24 Q. Okay.

25 A. -- on the east side of the building looking

1 south. You can't clearly see the south parking lot
2 there because of the vehicles and the big bush or
3 whatever's going on there, but that's standing at that
4 northeast corner of Building B looking south.

5 Q. Okay. And so the -- the -- the three cars
6 that you took photos of, one included the vehicle that
7 belonged to Steven Cozzi; would those be sort of in the
8 back --

9 A. Right where your --

10 Q. -- of Building --

11 A. -- pointer is, yeah.

12 Q. -- B?

13 A. Yes, sir.

14 Q. Okay. All right. All right.

15 And 110, is this looking towards Belcher, so
16 looking west between Buildings A and B?

17 A. Yes, sir.

18 Q. And -- and are you now able to -- to tell
19 whether or not the opening on the left is -- is an
20 ent -- entryway to the offices?

21 A. It appears to be. There -- there'll be more
22 photos down there to confirm that, but looking at that,
23 I think there's a little drop box or something there, I
24 think that's right outside the door.

25 Q. Okay.

1 A. That's what we're looking at.

2 Q. The -- the -- it almost looks like you're
3 circling several more times maybe or --

4 A. We just take several photos of the -- of
5 different ranges as we -- as we walk through the scene.

6 Q. Okay.

7 A. That's why there -- there's so many there.
8 And that -- again, that's a view -- that's looking back
9 west where I just came from, what --

10 Q. Right.

11 A. -- we're looking at now.

12 Q. Which is 123?

13 A. Yeah.

14 Q. Okay.

15 And then what about 124, is -- is the same?

16 A. Yeah. But it's coming back toward the -- the
17 side of the building there toward it -- like we said,
18 looks like the entrance there.

19 Q. Right.

20 And 125 -- actually, let me go to 126.

21 A. There we go.

22 Q. So that's -- that's the entrance; right?

23 A. Yes, sir.

24 Q. All right.

25 And, again, you -- you didn't find any evidence of

1 significance on the ground surrounding the building;
2 correct?

3 A. No -- I didn't see anything, no, sir.

4 Q. Okay. All right.

5 When you arrive, it -- there appears to be,
6 certainly, some law enforcement present. I believe in
7 the earlier photos the two cars that we're seeing here
8 in 143 were already at the scene.

9 A. Yes, sir.

10 Q. How many law enforcement officers were in the
11 building -- and -- and let me ask you this: Had you
12 entered the building by the time you did these photos?

13 A. No.

14 Q. Okay. So -- so any law enforcement officers
15 you would have encountered at this point would have been
16 outside the building.

17 A. Correct.

18 Q. Okay.

19 And -- and how many law enforcement officers were
20 there on the outside of the building, by your
21 recollection, during this time period that you're
22 walking around the outside?

23 A. I honestly have no idea. There were a couple
24 walking around and my main contact was just with the --
25 the detectives Bolton and Allred who were on scene. I

1 really didn't talk to anybody else. I couldn't --

2 Q. Okay.

3 A. -- tell you how many people were there.

4 Q. All right.

5 What's the reason for taking the photos with --

6 with law enforcement vehicles in them; anything?

7 A. Other than that's just where they were when --
8 when we arrived.

9 Q. Okay. All right.

10 So, going to 151, what are we looking at here?

11 A. That is basically a shot of the -- I don't
12 know if you want to call it the entryway; like from the
13 front doors looking into the little entryway to the
14 office building.

15 Q. Right.

16 Do you wear any type of body cam when you're
17 walking through taking photos?

18 A. No, we don't have body cameras.

19 Q. All right.

20 A. Our deputies do, but forensics, we don't.

21 Q. Okay.

22 And so how do you end up entering the building?

23 You -- you're finished up taking photos outside; does
24 someone tell you now to come inside the building?

25 A. After I completed my outside photographs, we

1 reconvened out front and talked and decided we could go
2 in and -- and take some photographs inside.

3 Q. And who is we?

4 A. Sup -- my supervisors and detectives Bolton
5 and Allred.

6 Q. Okay. And -- and when you say your
7 supervisors, who are the supervisors?

8 A. Supervisor Stropes and Assistant Supervisor
9 Klein.

10 Q. And what were they doing when you were walking
11 around taking photos, if you know?

12 A. I -- I don't really know what they were doing
13 at -- at that point.

14 Q. Okay.

15 A. Actually, I -- if I recall correctly,
16 Assistant Supervisor Klein was documenting the scene
17 also with -- I believe she did 360-camera outside, but I
18 am not a hundred sure.

19 Q. Okay.

20 A. I think that's what she was doing. I don't
21 recall what Supervisor Stropes was doing.

22 Q. What's the 360-camera called?

23 A. It's OSCR360. It -- basically, it's a camera
24 that takes a 360-degree photograph.

25 Q. Okay.

1 A. She would basically be -- if she was doing
2 that, she would be -- basically be taking the same
3 photos I was taking but they capture a 360-degree image.

4 Q. Okay.

5 The -- the -- when you arrived at the scene, you
6 had indicated that you were advised that it was a
7 missing person under suspicion -- suspicious
8 circumstances; right?

9 A. Yes, sir.

10 Q. Would -- would it be unusual for these type of
11 cases, missing persons under suspicious circumstances,
12 for you to come out with two supervisors?

13 A. Not really.

14 Q. Okay. All right.

15 A. Other -- I mean, other than the fact that we
16 had two working that day.

17 Q. Okay.

18 A. But, I mean, for -- to have a supervisor on a
19 scene for something like that, not unusual at all.

20 Q. All right.

21 Did -- was anyone indicating, in your presence, up
22 until this point, that there was any individuals of
23 interest or -- or -- as it related to the suspicious
24 circumstances?

25 A. Not that I recall, no.

1 Q. Okay. And -- so, as we go through these
2 photos, starting with 151, 152, is this showing us,
3 basically, the path that you take? Are you constantly
4 taking photos as you're walking through the building?

5 A. Yes, sir.

6 Q. All right.

7 And, as we're looking at 153, there's a door to the
8 left, that's the law -- law firm?

9 A. Yes, sir.

10 Q. And to the right is, I believe, another
11 office; do you know -- do you know who's in that office?

12 A. I don't recall, but there's probably a picture
13 with the name on the door at some point.

14 Q. All right.

15 MR. BRUNVAND: Let me -- let me -- hold on one
16 second. I'm going to go off the record for a
17 second.

18 (Off-the-record discussion held.)

19 MR. BRUNVAND: Okay. I'm going to jump back
20 to the images.

21 Q. (By Mr. Brunvand) Okay. So do you recall the
22 path that you take once you're done photographing the
23 lobby?

24 A. I'll be able to tell with the -- with the
25 photos where I -- basically, I believe I just went into

1 the office and through the office.

2 Q. Okay. It's a -- so right now we're looking at
3 163. What -- what are we looking at here?

4 A. Just inside the door -- if you go back to 162.

5 Yeah, that's looking inside the office door; and
6 then the next photo is the same closets on 163.

7 Q. Okay. All right.

8 And -- and, again, you go through the office and
9 basically photograph every -- every -- the entire
10 office?

11 A. Every room.

12 Q. Does it appear that you missed anything?

13 A. No, I think I got pretty much everything.

14 Q. Okay.

15 Looking at 173, what -- what are we looking at
16 here?

17 A. That's an office area some -- somewhere in
18 there.

19 Q. Okay. You don't necessarily know whose office
20 it is?

21 A. I can't really tell, no.

22 Q. Okay. And those are probably questions we can
23 ask other witnesses at another time.

24 Okay. Let's see here.

25 All right. I'm going to exit out of these.

1 Have you looked at these photos after you took
2 them?

3 A. Yes, I did.

4 Q. Okay.

5 A. It's been a while, but I have looked at them.

6 Q. Right.

7 All right. And I'm now going -- starting at 201
8 and -- and it looks like we're -- we're looking at
9 additional office photos inside the Blanchard Law
10 office.

11 This -- 214, is that a -- like a kitchen inside the
12 Blanchard Law office; --

13 A. I can't see the --

14 Q. -- do you know?

15 A. -- photo, so...

16 Q. Oh, you can't see it? I'm sorry.

17 A. No.

18 Q. Well, I was having a good time looking at it
19 myself.

20 A. Does it look like a kitchen to you?

21 Q. Okay. Let's see here. I apologize.

22 Are you able to see it now?

23 A. That's a -- a break room somewhere --
24 somewhere in the building there.

25 Q. Do -- do you know if that's in the Blanchard

1 office or --

2 A. I don't re -- okay. That is the office.

3 Q. Okay. So, I mean, it -- if it's in the middle
4 of these photos, and we're looking at 218 --

5 A. Yeah.

6 Q. That's still in the Blanchard Law office;
7 right?

8 A. Yes, sir.

9 Q. Okay.

10 And other than seeing, you know, things that you
11 might see in an office, did you see or photograph
12 anything that appeared suspicious to you within the
13 Blanchard Law office?

14 A. Nothing that I recall, no.

15 Q. Okay.

16 228, and -- and, I guess, 227 --

17 A. Uh-huh.

18 Q. -- what -- what are we looking at here? It's
19 a door, but where -- where does that take us?

20 A. That door, if we go back to 226, I believe
21 that is the door leading from Mr. Cozzi's office out
22 into a common hallway where a -- there's a little common
23 hallway that runs outside that door --

24 Q. Okay.

25 A. -- back to like an electrical room, a storage

1 room, and then around the other side to the -- where the
2 common area bathrooms are located.

3 Q. Okay. So this -- 220 -- 226, that's the same
4 door that we see a closeup on in 227 and -- and opened
5 in 228; is that accurate?

6 A. Yes. That's looking out into that little
7 hallway from the office.

8 Q. Okay.

9 And 229, what are we looking at?

10 A. I believe that is the back side of that same
11 door.

12 Q. Okay.

13 A. With it -- with -- that's closed.

14 Q. Right. Which would make sense because, I
15 mean, you -- you wouldn't be going to another door?

16 A. No.

17 Q. Okay.

18 Two -- what are we looking at here?

19 230; what are we looking at?

20 A. That is -- looking down the hallway outside of
21 that same door.

22 Q. In what -- in what direction? Are we looking
23 south? Are we looking west?

24 And maybe I can -- I don't know if it helps to zoom
25 in or not.

1 A. I -- I want to say that's looking south,
2 because I think there's a doorway to the left of that,
3 that leads back to a whole bunch of unoccupied office
4 space.

5 Q. Okay.

6 Do you remember if -- if, when you were taking
7 these photos, if you're going down into that part of the
8 office or if you're going -- the other direction is
9 toward -- towards the bathroom; right?

10 A. Yes.

11 Q. Do you remember where you go first?

12 A. I don't recall, but I'm sure the pictures will
13 help me out with that.

14 Q. The -- the -- the little white tag that's on
15 the door, do you know what that is?

16 A. That was -- that's nothing that I put on
17 there.

18 Q. Okay. All right.

19 A. That's something that was already on there.

20 Q. All right. And that was in 231.

21 A. That is standing next to that -- that same
22 door with the little sticker on it.

23 Q. Okay.

24 A. And that door to the right with no handle on
25 it, that is a electrical room, storage room, whatever,

1 there was like electrical panels and stuff in that room.

2 Q. Okay.

3 A. That's what that -- that's what that door is.

4 Q. All right.

5 So now that you see that when you were -- on the
6 earlier photo, does -- does that refresh your memory as
7 to what -- what direction you were looking, at that
8 earlier photo?

9 A. Yes. I would have been standing north of the
10 door that goes to Mr. Cozzi's office, looking south.

11 Q. Okay.

12 And then 234, what are we looking at?

13 A. That's looking in that door of that storage
14 room, electrical room, whatever you want to call it.

15 Q. Okay. And same as 235, 236.

16 What's the significance of this -- what is that, a
17 ladder or what is that?

18 A. That looks like that's a ladder that goes up,
19 I guess, in -- it -- there must be a roof access or
20 something via that -- that ladder --

21 Q. Okay.

22 A. -- in that room.

23 Q. So there's actually two -- appears to be two
24 ladders; right?

25 A. Well, yeah, there's the folding stepladder and

1 then there's the one that's mounted to the wall inside
2 the building.

3 Q. Okay. And do you know if any forensic
4 examination, beyond taking photos, had taken place at
5 this point?

6 A. Nothing up to this point. Any processing was
7 done after photographs.

8 Q. All right.

9 238, 239 --

10 A. That's --

11 Q. -- does that --

12 A. That's looking west in that same electrical
13 storage room from -- from the door there.

14 Q. Okay.

15 And is that you -- are you using a flash or some
16 artificial light source to get it brighter on these
17 or --

18 A. Camera flash; yes, sir.

19 Q. Okay.

20 Now, 240 is -- is -- what are we looking at in 240?

21 A. That is standing at the north end of that
22 little hallway --

23 Q. Uh-huh.

24 A. -- from outside Mr. Cozzi's office, looking
25 west. The women's restroom, you see the sign there on

1 the wall to your immediate left.

2 Q. Right.

3 A. And then as you go down farther, the doorway
4 on the right, just past those three photographs, takes
5 you back out into the little entryway, where I first
6 came in the building.

7 Q. Right.

8 A. The doorway to the left, where the white frame
9 is by the -- by the box on the floor, that goes to the
10 men's restroom and then there's another door that leads
11 back into additional office spaces in -- within the
12 building.

13 Q. Okay.

14 So it appears that after you go into the utility
15 closet and take those photos, you come back out and you
16 take one photo looking down this hallway.

17 A. Yes, sir.

18 Q. And for some reason the next photo -- so
19 this -- what we're looking at now is 240, that's the
20 hallway. The next photo, 241, appears to be back
21 looking at the rear of the -- the Honda that's believed
22 to be Steven Cozzi's vehicle, right?

23 A. Yes.

24 Q. All right. So before we go to that, how do
25 you -- when -- when you're looking down the hallway and

1 taking this one photo, why do you -- it -- it appears
2 that you stop and you go back outside; why -- why is
3 that?

4 A. When I was sent inside to do photos of the
5 office area and stuff, that was as far as I was told to
6 go at this point.

7 Q. Okay.

8 A. And then they asked me to come back outside
9 and they wanted to go ahead and document the exterior
10 and the interior of Mr. Cozzi's vehicle.

11 Q. Okay.

12 So -- so who told you to stop at -- at 240?

13 A. I don't remember, but one of my supervisors
14 came in and -- when I went in initially, they told me to
15 get the office area and the hallway up to the bathrooms
16 and at some point during my documentation I was told
17 when I'm done with that point to go out and document
18 Mr. Cozzi's vehicle.

19 Q. Okay.

20 When you leave this area to go out and document
21 Mr. Cozzi's vehicle, how do you exit the building to get
22 to Mr. Cozzi's vehicle?

23 A. I don't remember if I went through the door to
24 the right there or if I went back through the office
25 area. But -- at any rate, it was back out through the

1 main -- main entry doors that we came in.

2 Q. It -- the -- in the photo by the bathroom door
3 for the men's room, there appears to be a cardboard box;
4 do you see that?

5 A. Yes, sir.

6 Q. Do you recall seeing that when you were there?

7 A. It was there when I took the photos. It -- we
8 asked about it and it was there when -- we were told it
9 was there when the officers arrived, so...

10 Q. Do you remember --

11 A. How it got there or who put it there or --

12 Q. Right.

13 Do you remember seeing any other type of paper on
14 the floor in the proximity of that box?

15 A. I don't directly recall, no.

16 Q. Okay. All right.

17 All right. So then the next series of photos
18 were -- well, you have access, basically, to Cozzi's
19 car.

20 Do you know how you were able to get access to his
21 car?

22 A. I don't remember if -- somebody got keys for
23 it. I think the keys were in the office, but I -- I
24 don't remember how we got in the vehicle.

25 Q. Okay.

1 A. I -- I know for a fact that they didn't call
2 anybody out to make entry into the vehicle.

3 Q. Okay.

4 And so all the photos, then, through -- from, I
5 think, 241 through 264 are photos of the interior of the
6 vehicle, some of the exterior of the vehicle, and,
7 basically, it's -- you're processing the vehicle with
8 your camera.

9 A. Yes, just documentation.

10 Q. Okay.

11 Then 265, it appears that you are now back inside a
12 building. What are we --

13 A. Yes, sir.

14 Q. -- looking at here?

15 A. Okay. That partial door that's open to the
16 right there in the -- in the side of the frame --

17 Q. Right.

18 A. -- where you can see the deadbolt and all
19 that, that is the door that had the white paper on it at
20 the end of the hallway, that we first talked about.

21 Q. Okay. One little --

22 A. Right --

23 Q. One little rectangular --

24 A. -- there --

25 Q. -- sticky note that was --

1 A. Yes, sir.

2 Q. -- on the --

3 A. That's that door.

4 Q. Okay.

5 A. And then the other partial door was sitting
6 open like that. That doorway and the subsequent photos
7 are photos of empty office space that -- as we go
8 through the photos you'll see it -- heads back south in
9 front of the building and that goes to the offices that
10 are unoccupied towards the south end of the building.

11 Q. Okay. So when I'm looking at 267, that's
12 looking south in the building?

13 A. Yeah, that's a hallway leading to additional
14 offices. There's -- the next bunch of photos are -- the
15 whole area was unlit back there. That one's like, I
16 think, completely blown out with flash.

17 Q. Okay. So 268 --

18 A. So --

19 Q. -- 269, --

20 A. Yeah.

21 Q. -- 270, your I --

22 A. The --

23 Q. -- ISO is too high and you had the flash up,
24 it looks like.

25 A. Something. A little -- little flash act --

1 issues there but --

2 Q. Okay. Do -- do you realize that that's
3 take -- it's a digital camera; I mean, is -- is it a --
4 what do you call it -- is it one where you can actually
5 see that it -- that it -- that it ended up being all
6 whited out or do you not realize that until you look at
7 the photos later?

8 A. Oh, you absolutely know.

9 Q. Okay. All right.

10 What's the -- what's the type of camera I'm talk --
11 thinking about, like a Nikon Z9, it's called --

12 A. We have -- well, we have a few different
13 Nikons. I have a 5600 --

14 Q. Okay.

15 A. -- Nikon and occasionally you have a -- a few
16 photos blown out, but --

17 Q. Okay.

18 So -- so, again, all these photos are basically
19 from these vacant offices to -- to the south of the
20 Blanchard Law office; right?

21 A. Yeah. Some of these are -- yeah, and there's
22 one where the flash did go off.

23 Some of these are the -- on the west side along the
24 back parking lots, and the rest of it leads to -- we're
25 basically working our way south.

1 Q. Okay.

2 A. If you recall, when we were in the south
3 parking lot, there's windows on the south side.

4 Q. Right.

5 A. Eventually that's where we end up.

6 Q. Okay. All right.

7 And when you're going -- when you're going through
8 here and taking these photos, do you check any of the
9 windows or -- or -- or doors that exit the building to
10 see if they're locked or unlocked?

11 A. I personally didn't check any. Like this
12 window here, I mean, you can see out, that's the south
13 corner where Mr. Cozzi's vehicle is.

14 Q. Okay. And that's --

15 A. And --

16 Q. -- and that's -- we're looking at 285.

17 A. Yeah. That's looking out the south side.

18 I know there's a door in one of these photos, I
19 think maybe the next one or the next two --

20 Q. Right.

21 A. -- that leads to the south --

22 Q. Two --

23 A. -- parking lot.

24 Q. 286?

25 A. Yeah. That's one of the doors that exits out

1 of that south parking lot and you can see some mail
2 there for somebody that's no longer a tenant or junk
3 mail, who knows. But I know that door was -- was looked
4 at and that door's locked and there was no sign of
5 anything -- anybody making entry through that door.

6 Q. Okay. So -- so when you say I know that that
7 door was -- was looked at and that that door was locked,
8 do you know that because someone told you that or do you
9 know it because you yourself checked it?

10 A. We had that discussion, the -- the detectives
11 and I. They said they had checked that from -- from the
12 outside.

13 Q. Okay.

14 A. And you can -- you can see that the bolt is in
15 place or whatever, so...

16 Q. Right. Okay.

17 When you -- when you say you can see that the bolt
18 is in place, how do you -- I'm look -- I'm trying to --

19 A. I guess they looked at it from the outside and
20 you could see that it's still locked. It's a key lock.

21 Q. Okay.

22 A. But if anybody would have made entrance
23 through there, they would have had to have had a key.

24 Q. Okay. Based on looking at -- from -- from the
25 outside.

1 A. Yes, sir.

2 Q. Do you know if this door could be locked from
3 the inside without a key?

4 A. I don't know but I -- I believe it's got one
5 of those little thumb screws on it. It may be a
6 double -- double-key thing.

7 Q. Okay. Would there be --

8 A. I don't know if we can tell from that photo or
9 not, but --

10 Q. Yeah, I don't know that there's any that's
11 that close up.

12 A. I don't think so.

13 Q. Okay.

14 So -- but just to be clear, your -- your -- your
15 conclusion that the doors and windows were locked is
16 primarily based on other law enforcement officers
17 telling you that they -- what -- they saw things that
18 told them that it was locked.

19 A. Yes, sir. I didn't -- I didn't personally
20 check each and every door or window, no.

21 Q. Did you check any doors and windows?

22 A. I did not.

23 Q. Okay.

24 292, what are we looking at here?

25 A. I believe we're heading back out into the

1 hallway where we came in from.

2 Q. Okay. Let me go back to --

3 A. If I recall correctly. I can't --

4 Q. So it says -- let me see what it says on
5 the -- it says restroom, no exit, on that door.

6 Is that a -- is that a restroom that's unrelated to
7 the restroom that's closer to the -- to the Blanchard
8 Law office or is that the Blanchard Law office restroom;
9 do you know?

10 A. I believe that is on the inside of that --
11 we're -- we're heading back out of those office spaces,
12 back into that common hallway.

13 Q. Okay.

14 A. It just basically says restroom and that's not
15 an exit for -- I am not a hundred percent sure on that,
16 but that's where we're going, so...

17 Q. Okay. So -- so the next photo, which is 293,
18 is -- is that -- that looks like the utility closet
19 where the breakers are; right?

20 A. Yes.

21 Q. Okay. And then there's a series of photos
22 from the utility closet.

23 Do you know of any efforts, at this point in time,
24 when you're taking these photos, had been made as far as
25 taking -- obtaining any type of latent fingerprints?

1 A. No processing of anything was done until our
2 evening shift people came on.

3 Q. Okay.

4 A. So there was no -- no processing --

5 Q. Nothing --

6 A. -- at that time.

7 Q. -- nothing had happened --

8 A. No.

9 Q. -- at that point.

10 On 300, it appears that we're looking at that
11 ladder that goes up into the attic.

12 A. Yes.

13 Q. Do you know whether or not -- you had -- you
14 had mentioned earlier that maybe there was an exit in
15 the attic; did -- do you know whether or not that is in
16 fact -- whether there's an exit in the attic or -- or --

17 A. What I had said before, I -- I presume that
18 that takes you up and there might be roof access there.
19 I don't directly know that. Nobody --

20 Q. Sure.

21 A. -- told me that. I'm just --

22 Q. Okay.

23 A. -- assuming that -- that they have acc -- they
24 have a ladder up there so I'm assuming it goes someplace
25 up there.

1 Q. Sure. Sure.

2 And you didn't -- you didn't further explore that
3 yourself; right?

4 A. No.

5 Q. Okay.

6 MR. BRUNVAND: I am going to, again, take a
7 quick break. And we have Robin Clark waiting so
8 I'm going to let her get rescheduled, as well.

9 (Off-the-record discussion held.)

10 Q. (By Mr. Brunvand) Okay.

11 All right. 301, this looks --

12 (Mr. Vonderheide received a phone call.)

13 MR. BRUNVAND: Nathan, you want to mute
14 yourself?

15 MR. VONDERHEIDE: Oh, sorry. Yeah, I do.

16 MR. BRUNVAND: Okay.

17 Q. (By Mr. Brunvand) So this looks like 301, and
18 this is another view looking up that ladder in the
19 utility closet?

20 A. Yes.

21 Q. And that appears to maybe some sort of an
22 access panel to -- with that red handle is -- would you
23 agree?

24 A. I really can't tell, but --

25 Q. Could be an access panel.

1 A. Yeah, it could be.

2 Q. All right. Okay.

3 So then the -- there's a few more photos from --
4 let's see here 304, that's also in the utility closet, I
5 assume?

6 A. Yes. Just showing some things on the shelves
7 there.

8 Q. Okay. All right.

9 I'm going to go to 305. It appears to me that
10 we're looking westbound towards Belcher and -- and on
11 the left side is the men's room doorway and there's that
12 cardboard box that we had seen in the earlier photos; is
13 that right?

14 A. That's correct.

15 Q. Okay.

16 Have you now been instructed to take additional
17 photos from the inside?

18 A. Basically, that's -- yeah, I just went back
19 and finished up what I was doing before.

20 Q. Okay. But I -- but I thought initially you
21 were told to only do a certain part at the office and
22 then -- and then when you got to this point you were
23 told to come out and do Cozzi's car.

24 A. Yeah, I was like -- basically, when I get to a
25 stopping point that I could --

1 Q. Okay.

2 A. -- is kind of where I got to at that point.

3 Q. So, basically, it was your discretion, when
4 you -- when you had a good stopping point, go do this;
5 right?

6 A. Yeah, 'cause I really didn't know how much
7 farther I was going to be going inside and that was just
8 a good place to stop and --

9 Q. Okay.

10 A. -- so...

11 Q. So the next photo, 306, what are we looking at
12 here and -- and -- and what direction are we looking at?
13 And would it help to --

14 A. Let me just see if --

15 Q. I can go to 307 to see if that helps.

16 A. I'm --

17 Q. 38 -- I mean, 308.

18 A. Yeah, that's the other -- it appears to be the
19 other side of that hallway.

20 Q. Okay.

21 A. Bathrooms.

22 Q. Okay. So -- so that -- so you passed the
23 bathroom and you're heading towards -- I think there is
24 part of the veterinary --

25 A. Yeah, it's kind of weird. I guess that -- I

1 don't know. That office, when you go in the entrance
2 there, across from the law office --

3 Q. Right.

4 A. -- I don't know if that's their only portion
5 or how this is -- the rest of the building is shared,
6 but I know that going -- going the way we're going now,
7 back in there, back south down the hallway and stuff,
8 the veterinary office owns that back there, and I guess
9 they run a call center out of there and some other
10 stuff.

11 Q. Okay.

12 A. And there's like a -- if I remember correctly,
13 there's another kitchen and break area down this hall, I
14 think at the end of this hallway we're getting to.

15 Q. So -- so it app -- it appears to be -- and
16 correct me if I'm wrong, but it appears, to me, that
17 you -- you -- once again, you passed the men's bathroom,
18 you don't look -- you don't look into it, you don't take
19 any photos, you just -- you -- we -- you see the photo
20 of -- of the door and the cardboard box and then you go
21 onto other parts of the building again --

22 A. Right.

23 Q. -- is that accurate?

24 And -- and I'm looking at 310. This almost looks
25 like it's more vacant office area?

1 A. Yeah. We're getting back to, I guess, what
2 the veterinary office and stuff owns.

3 Q. Okay.

4 A. And there's a --

5 Q. What -- what are we looking at here in 3 -- in
6 313?

7 A. What's the next photo in that sequence?

8 There's a little room back there that's got --
9 yeah, it's like a little break area and stuff.

10 Q. Okay.

11 A. I don't know if that's shared by the
12 veterinary office people or if that's something that
13 that other office uses, but it's just another little
14 kitchen area back there.

15 Q. Okay.

16 A. And then you can see down the end here,
17 there's a little room back there that's used by the
18 vet's office for making calls and scheduling
19 appointments and stuff.

20 Q. All right. And that's 316 that we're talking
21 about.

22 A. Yeah, down at the end of the hall there.

23 Q. All right.

24 A. Yeah, that's that little room I was talking
25 about.

1 Q. All right. 318, and that's -- that's actually
2 going into that room?

3 A. Right.

4 Q. Were there people in there working at the
5 time?

6 A. There were a couple of people for the vet's
7 office in there working.

8 Q. Okay.

9 A. But --

10 Q. Did you ask them to step aside so you could
11 take the photos?

12 A. Yeah. We try not to get anybody in the
13 photos.

14 There is a door that exits out into the parking lot
15 on the Belcher side that they can use to come in and
16 out.

17 Q. And as I'm looking at --

18 A. Yeah.

19 Q. -- 324, is that the door that exits out to the
20 Belcher side of the parking lot?

21 A. Right.

22 Q. Okay. Do you know if that was locked or
23 unlocked?

24 A. I don't know because the vet people were using
25 it. They could use that to go in and out. So I don't

1 know what the status was, that is, if they had to use a
2 key to get in and out or -- or how that -- how that
3 worked for them.

4 Q. Do you know whether or not there were other
5 men -- men's room and ladies' rooms in the building
6 other than the two that are sort of in the area by the
7 attorney's office, Blanchard Law office?

8 A. I do not know. I didn't see any, but I
9 don't -- I don't know if there -- if there were.

10 Q. Do you know if anyone was using those
11 bathrooms while you were there doing your forensic work?

12 A. I -- I know they weren't. Everybody was
13 basically -- if they had anything they needed to go back
14 to the main vet's office --

15 Q. Okay.

16 A. -- next-door.

17 Q. All right.

18 Now, 328, it appears that -- that you're now
19 outside looking at a dumpster that's across from -- from
20 Belcher Road, it looks like.

21 A. Yeah. That sets on the southwest corner of
22 the parking lot. That -- the white vehicle to the right
23 is one of my supervisor's vehicles. But that dumpster
24 sets in the southwest corner of the parking lot and they
25 just wanted to get photos of any contents inside the

1 dumpster.

2 Q. Okay.

3 And -- and so the next photo, that's, basically,
4 content from within that dumpster?

5 A. Yes.

6 Q. And it looks like -- that's 329 and -- and
7 there's a series of photos through 333 that are all
8 content of -- of the dumpster?

9 A. Yes.

10 Q. Okay.

11 Next --

12 MR. BRUNVAND: Sorry, that was -- Alexa
13 decided to talk to me. Whoever that is, Siri, I
14 guess it is on my cell phone.

15 THE WITNESS: Not on your -- not on your
16 schedule for the depo?

17 MR. BRUNVAND: No.

18 Q. (By Mr. Brunvand) So then it jumps into a
19 photo from, it looks like a desktop, and it's
20 Number 334. What are we looking at here?

21 A. Yes. I went back inside -- I don't remember
22 which or both detectives wanted me to photograph the top
23 of Mr. Cozzi's desk and anything on the desk.

24 Q. Okay.

25 A. And that's what we're looking at now, the top

1 of his -- these next series of photos are, basically,
2 the desktop of Mr. Cozzi.

3 Q. Okay.

4 All right. And it looks like that ends at 339.

5 I want to go back briefly to 305. Again, we're
6 looking at that cardboard box, we're looking at the
7 bathroom on the left.

8 In order to get to the other part of the office,
9 you're passing that cardboard box; right?

10 A. Yes.

11 Q. And you're -- and then you turn left into
12 the -- where -- where that open door is?

13 A. Yes.

14 Q. Okay.

15 And, again, why is it that you don't access or take
16 any photos inside the men's bathroom?

17 A. Well, since they were going to be processing
18 in there, since Mr. Cozzi was known to go to the
19 bathroom, they were just going to do the documentation
20 inside the bathroom prior to and during any processing.

21 Q. Who is they?

22 A. The evening shift, when they came in.

23 Q. Okay.

24 A. As part of their processing and documentation,
25 they were going to do -- 'cause I didn't photograph the

1 women's bathroom either.

2 Q. Okay. Do you know if --

3 A. I --

4 Q. Do you know if anyone photographed -- during
5 the afternoon, photographed the men's bathroom and the
6 women's bathroom?

7 A. At the time when I was doing this, nobody else
8 was -- as far as I know, no photos were taken inside
9 there.

10 Q. Okay. If -- if, on the other side of this
11 box, there was a tissue on the -- on the ground that may
12 look like it may have had, you know, blood on it or
13 something that could be blood, would you have likely
14 taken a photo of that if that -- if you had seen that?

15 A. If I would have seen it -- I don't recall
16 seeing it --

17 Q. Okay.

18 A. -- but, I mean, --

19 Q. When you come back in from outside where the
20 dumpster is to photograph Mr. Cozzi's desk, do you
21 recall whether you come back through the same way that
22 you had exited or whether or not you come in through
23 some other location?

24 A. I came back in through the main -- main doors
25 where I initially came in.

1 Q. Okay. All right.

2 All right. I think that's it for that series of
3 photos.

4 So just -- just to make -- you did not -- if you
5 had noticed or seen a -- either a paper towel or a
6 napkin or a tissue on the ground by that box outside the
7 men's bathroom, you would have photographed it, right?

8 A. If I would -- I'm not saying it wasn't there,
9 but if I would have -- I would have photographed it if I
10 would have -- you know.

11 Q. If you had seen it.

12 A. If I'd have seen it.

13 Q. Okay.

14 A. I may -- I may have walked past it if it was
15 on the other side of that box and just not seen it to
16 photograph it, 'cause I don't have any photos looking
17 back that way, so...

18 Q. And -- and so, from what you understood,
19 several members of law enforcement had already been
20 around throughout the office building, had looked into
21 the bathroom, had been in and out of that hallway prior
22 to your arrival; right?

23 A. I don't know how many. A couple. I -- I have
24 no idea, 'cause --

25 Q. Okay.

1 A. -- I know Largo was on scene for a while
2 before we got there, so I really don't know what -- you
3 know.

4 Q. Okay.

5 But it's not at all uncommon if there's anything
6 that might be of interest or suspicious, that it would
7 be pointed out to you when you're taking photos, they
8 would say make sure you get a photo of this?

9 A. That'd be fair to say.

10 Q. Okay. And -- and no one told you make sure
11 you get a photo of the tissue or the napkin that's on
12 the floor next to that cardboard box?

13 A. Not that I recall, no.

14 Q. Okay. All right.

15 And if someone had told you, you would have taken a
16 photo of it; right?

17 A. Yes.

18 Q. If it was there.

19 A. If somebody would have pointed out and said
20 there is something there to photograph, I would have
21 photographed it.

22 Q. Okay. All right.

23 A. So --

24 Q. The -- okay. I believe that's it for the --
25 for the initial supplement. Is that accurate?

1 A. Yes, sir.

2 Q. Am I missing anything on -- as it relates to
3 that?

4 A. No, I think that pretty much covered that.

5 Q. Okay.

6 So the next supplement is Number 21. And this is
7 when you go to Forensic Science Division's Vehicle
8 Processing Garage and it's with Supervisor Stropes and
9 Assistant Supervisor Klein to process a gray Toyota
10 Tundra.

11 A. Yes.

12 Q. And -- and when -- what's the date of -- of
13 that?

14 A. This was on March 24th of 2023 at 1328 hours,
15 roughly 1:30 in the afternoon.

16 Q. What's the address?

17 A. 14605 49th Street North, Unit Number 10.

18 Q. Okay. Let me see if I can find it.
19 Would you know -- you took photographs; right?

20 A. Yes.

21 Q. Do you -- do you know what sequence -- how
22 that would be labeled for those photos?

23 A. I do not.

24 Q. Okay. Let me see if I can find them.

25 A. I don't know -- I don't know what -- how you

1 have access to the photos, but in some cases you can
2 search by our payroll number and it will bring up photos
3 that --

4 Q. Right. I don't know if it --

5 A. -- I specifically took, so...

6 Q. Let me see here.

7 A. I don't know if you have a way to search by
8 that. I don't know what you're using to --

9 Q. I don't know that I do but let me try. Let me
10 see.

11 A. I know in our system we're able to put like a
12 person's payroll number in and we can just pull up
13 photos specific to them, but I don't know, obviously --

14 Q. Okay.

15 A. -- what we've got going on.

16 Q. Yeah. And that's the -- the 54514 number;
17 right?

18 A. Yes, sir.

19 THE WITNESS: Oh, man.

20 MR. BRUNVAND: Everything okay?

21 THE WITNESS: Yeah, my battery's getting low
22 on this laptop 'cause I'm in a spare office.

23 MR. BRUNVAND: You want to take a break so we
24 can -- so we can -- you can get a power source or
25 something like that?

1 THE WITNESS: If I can get one. I'm hoping
2 there's one in this office. If not, I can run --
3 let me run down the hall and grab one real quick.

4 MR. BRUNVAND: I'm going to take a quick break
5 for everyone; so why don't we take a five-minute
6 break?

7 THE WITNESS: Okay.

8 MR. BRUNVAND: All right.

9 (There was a brief recess and the proceedings
10 reconvened with the same appearances.)

11 Q. (By Mr. Brunvand) Okay. Do you see this is
12 Image P0001?

13 A. Yes.

14 Q. Is that you or is that someone else?

15 A. That is me.

16 Q. Okay. So why -- it appears that these are
17 missing the -- your ID number for some reason.

18 A. I don't --

19 Q. I mean, it --

20 A. -- know -- what are -- what's the subsequent
21 photos?

22 Q. Yeah, let me -- let me exit out of this one
23 and then I'll get them all up. I just wanted to confirm
24 that that was, in fact, you.

25 Well, let's see here. There's quite a few so I'm

1 going to pull -- bring up the first 100.

2 Okay. And -- and these appear to be -- let me --
3 let me share it. Let me see here. So these appear to
4 be the -- the Tundra photos.

5 A. Right.

6 Q. And I'm just wondering, so -- so this is -- it
7 starts -- let me make sure I didn't mess this up here.

8 Yeah, I skipped -- I skipped 1 and 2. But 2 is
9 just the -- the -- the tailgate. And then it appears
10 that there's a hundred photos here, or more, of -- of
11 the Tundra, both interior and exterior.

12 So the -- these are -- these are all your photos;
13 right?

14 A. The first one was my identifier photo; right?
15 Yeah.

16 Q. Right. So, presumably, if the identifier
17 photo is you --

18 A. Correct.

19 Q. -- then it has the same sequence except it
20 doesn't have your number on there, that those would
21 still be your photos; right?

22 A. Yes.

23 Q. Okay.

24 And I'm just going to -- I'm just sort of glancing
25 through these photos.

1 Do you -- had the car been processed prior to you
2 taking these photos?

3 A. No.

4 Q. What -- I'm looking at 1 -- I mean, on -- on
5 15. What -- what -- what is this label and what's the
6 significance of that tape?

7 A. That's an evidence seal with the initials and
8 the payroll number and the date of the person who sealed
9 the vehicle --

10 Q. Okay.

11 A. -- before it was transported to our -- to our
12 garage. You'll see several of these photos, and
13 basically, the documentation is to show that when I got
14 the vehicle that the vehicle was still sealed, that the
15 evidence seal hadn't been broken.

16 Q. Okay.

17 A. And -- so, yeah, there should be -- I can't
18 think who that is that -- that sealed it, but there
19 should be corresponding photos taken by them --

20 Q. Right.

21 A. -- that will show basically the same thing
22 that they took before the vehicle was loaded on the
23 flatbed and transported to our processing facility.

24 Q. All right.

25 Give me a second here.

1 A. What's the last photo in the sequence?

2 Q. Well, the ones that I have in here is -- but I
3 need to exit out.

4 A. Okay.

5 Q. There's more than a hundred. I think there
6 is --

7 A. Oh, okay. Okay. That's -- that's what I was
8 trying -- I was kind of confused, because I'm saying it
9 shows I took 119 for this supplement and we're only
10 in -- at -- at the top of the page it's showing 98 so I
11 was a little --

12 Q. Yeah.

13 A. -- a confused here.

14 Q. Yeah. Let me -- let me -- let me take a look
15 here and I'll tell you exactly how many there are.

16 A. All right. Well, now -- okay. I'm -- I think
17 I know why the --

18 Q. Okay. There's a -- there's 119.

19 A. Okay. And I think I -- I think I know why
20 now. Okay. The way you've got them broken apart I
21 can -- okay.

22 Q. Yeah, if I put too many of them in, the -- it
23 freezes up my computer, so...

24 A. Okay.

25 Q. Let's see here.

1 A. I just get concerned when I have one thing of
2 numbers and I see something a little bit different.

3 Q. Sure. Sure.

4 So, what are we looking at here on 117?

5 A. Okay. I think we are into luminol
6 photography, which --

7 Q. Okay. And -- and I'm going to -- I'm going to
8 exit it again because I thought I had them all so that
9 we can go through them together but for some reason --
10 okay. Here we are. Let's see here.

11 A. That's -- that's why I -- I figured out why
12 they're split. Because the first ones are the vehicle
13 and then there should be separate ones of luminol
14 photography, which I think that was probably one of the
15 first ones, or somewhere thereabouts, or maybe closer to
16 the end, but --

17 Q. Okay.

18 A. -- it's more luminol photography.

19 Q. All right. So what are we -- what are we
20 looking at here?

21 We're looking at 114, tell us about what we're
22 looking at in this --

23 A. That --

24 Q. -- photo.

25 A. -- that is a photograph of the truck bed

1 that's been processed with luminol and -- you're
2 familiar with luminol?

3 Q. I am. And I'm going to -- I'm going to
4 brighten it up a little bit.

5 A. Yeah.

6 Q. All right. Can you see it pretty well on your
7 end?

8 A. I can see it fine. I can see the -- the
9 luminescent areas in the -- in the photo.

10 Q. Right. So there -- there appears to be -- I
11 assume you're referring to kind of a bluish --

12 A. It's blue --

13 Q. -- purplish --

14 A. Yeah.

15 Q. -- color?

16 A. Yes.

17 Q. And you can see a couple of lines and then
18 some dots on the bed and also on the -- on the gate
19 or -- or the lid for the -- for the trunk area; is that
20 right?

21 A. Right.

22 Q. And -- and so tell us about this. What -- who
23 administered this and -- and -- and I -- I assume you
24 take the photos but does someone else administer the
25 luminol and the -- how does that work?

1 A. Right. I'd have to look at my report, but --

2 Q. Feel -- feel free to look at your report.

3 A. Well, I -- I -- basically, Supervisor Stropes
4 and Supervisor Klein were there, and I believe Stropes
5 did -- yeah, Supervisor Stropes sprayed the luminol,
6 I --

7 Q. Okay.

8 A. -- took the photos. And any areas that
9 luminesced, glowed, whatever you want to call it, the
10 blue areas, were swabbed by Supervisor Klein and she
11 tested those swabs with phenolphthalein, 'cause we were
12 looking for possible blood. And I -- as you know,
13 luminol isn't -- you know, it's a -- it's a
14 presumptive -- it -- it could react to other things
15 besides blood, which is why the phenolphthalein swabs
16 were done subsequent to the luminol.

17 Q. So -- so -- so as far as the luminol, what
18 other kind of things might react and give a similar
19 reaction?

20 A. Well, since it's not specific to blood, I
21 mean, it could react to bleach, metal, certain kinds of
22 metal, plant material. I mean, there's other things
23 that will cause it to luminesce.

24 Q. Okay.

25 A. Which is why there's -- the swabs were done

1 for phenolphthalein, which is another presumptive test
2 for blood. So you can't just do luminol, you have to
3 have, you know, follow-up presumptives.

4 Q. Okay. So -- so the luminol is a presumptive;
5 right?

6 A. Yeah, it would show you, like, if something
7 had been cleaned up or something like that; that's
8 pretty much why you would use luminol. But, as I said,
9 it's not a hundred percent. Other things can cause it
10 to react and -- and give the same type of reaction.

11 Q. And -- and do you -- would -- do you consider
12 yourself an expert in that area, as far as, you know,
13 the type of substances that may give a positive reaction
14 to the luminol and then -- and the -- and the types that
15 wouldn't?

16 A. I don't consider myself an expert in anything,
17 but I know that in the training I've had and -- and
18 experience in the field, that just because something
19 luminesces when it -- luminol's applied doesn't
20 necessarily mean it's blood, doesn't mean it's not.
21 That's why any time we use luminol there's -- those
22 areas are also swabbed and tested with phenolphthalein,
23 which is another presumptive test. And anything that
24 would test positive with phenolphthalein, swabs are
25 taken and those are sent out for analysis for

1 confirmation whether it's blood or not.

2 Q. So -- so -- so the -- the presumptive
3 phenol -- phenolphthalein test still does not
4 necessarily prove that -- that the substance is blood;
5 is that correct?

6 A. It's not a hundred percent. I mean, even if
7 it tested positive for blood, it doesn't specify whether
8 it's human blood, animal blood. That's why swabs are
9 taken of the area after, you know, tested with
10 phenolphthalein and sent out for a confirmation.

11 Q. Do you know whether or not there are any other
12 agents that -- other than blood that would test positive
13 under the phenolphthalein test?

14 A. Not off the top of my head. But I also know
15 if I apply the phenolphthalein test to a swab that
16 hasn't had anything done to it, it'll -- it'll give a
17 reaction similar to a positive result because it's an
18 oxidation process.

19 Q. Okay. Okay.

20 So the areas that you see in -- in -- 114 is bas --
21 is basically the truck bed?

22 A. Yes.

23 Q. So is 115, 116. 1 -- 118 is the interior of
24 the car. And I don't know if there's any -- are you
25 seeing any on this photo?

1 A. Not really in this photo. I know there's --
2 if there is, it was very light. It's probably harder to
3 see in the photo than it was --

4 Q. Okay.

5 A. -- being there. But, again --

6 Q. The -- the significance of -- of -- of that,
7 whether it's inside the car or -- or in the truck bed of
8 the car, is that you then want to swab and do additional
9 testing?

10 A. Correct.

11 Q. Any other significance beyond that?

12 A. Not really. I mean, you'll -- you'll test
13 areas and if you -- like I said, if you apply the
14 luminol and you get luminescence, obviously, you'll swab
15 it, do phenolphthalein, you'll take an additional swab
16 if you get, you know, a quote/unquote positive result
17 for possible blood. And then those swabs will be sent
18 out for further analysis.

19 Q. Right. Okay.

20 And you said it was Supervisor Stropes that -- that
21 assisted in the phenolphthalein confirmatory test?

22 A. That was Supervisor Klein.

23 Q. Klein?

24 A. Well, let's see. Part of it, I think Klein
25 did, and part of it, Stropes did. There was -- we did

1 two different -- basically, what it was is, Klein did
2 the swabs here and Stropes do the -- the
3 phenolphthalein. I misspoke previously, but looking at
4 my report, it was -- because being up there and trying
5 to get the swabs and test them and all that stuff, so
6 she would swab it and Stropes would do the
7 phenolphthalein test on it.

8 Q. Okay. So -- so -- so -- just to make sure I
9 understand it now. So -- so Klein does the -- does --
10 does the --

11 A. She swabbed the areas.

12 Q. She does the luminol, or --

13 A. I believe, Stropes sprayed the luminol, then
14 you have a few seconds, whatever, and then any areas
15 that luminesced, Klein swabbed them, handed the -- the
16 swabs to Stropes, who did the phenolphthalein test on
17 them.

18 Q. Okay.

19 And -- and -- and then again, just to confirm,
20 anytime there is a positive presumptive, you go to the
21 next stage and then the final stage, it still has to be
22 sent off for testing to confirm whether or not it's
23 blood or not.

24 A. Correct.

25 Q. Or -- or -- or other substances.

1 A. Right.

2 Q. Okay.

3 Do you -- do you know whether or not there's any
4 type of cross-reaction potentially between luminol and,
5 phenolphthalein?

6 A. No.

7 Q. No, you don't know or no, there is not?

8 A. No, I don't know, but that'd be a question for
9 somebody else.

10 Q. Okay.

11 Part of what -- what you did here with the photos
12 that we've been looking at, is documenting what you are
13 seeing as far as the -- as far as the luminol testing
14 is -- is concerned. Do you -- do you -- and the reason
15 for that is -- is -- why do you photograph it?

16 A. To show relationship of where it would be in
17 the vehicle, any patterns, anything like that.

18 Q. Okay. And what about the -- the follow-up
19 presumptive test with the phenolphthalein, do you -- can
20 that be photographed?

21 A. I mean, it could be, but the problem with that
22 is, is, like I said, if you apply the -- the test to a
23 swab and stand -- stand out in the open air with it for
24 a few minutes, it's eventually going to turn pink, which
25 would look like a positive reaction. And since there

1 would be no way to accurately say when that photograph
2 was taken, there -- there would be no point in
3 photographing a positive result on a phenolphthalein
4 swab; at least in my opinion.

5 Q. Okay.

6 When -- when you completed these two tests,
7 presumptive tests with your supervisors, do you
8 communicate the findings with anyone from Largo Police
9 Department?

10 A. Specifically, not me.

11 Q. Were you present while someone else reported
12 the findings to the Largo Police Department?

13 A. I was not.

14 Q. Okay.

15 So do you have any knowledge as to what may have
16 been said to Largo Police Department about the findings
17 during this examination of the Tundra?

18 A. I -- I don't recall. I mean, when we did
19 the -- the processing of the vehicle, you know, that's
20 all -- it's all documented, everything we written -- was
21 written down. So I -- I don't know what was discussed
22 after the fact.

23 Q. I -- this is -- this -- this is a pretty
24 high-profile case, would you agree?

25 A. I would.

1 Q. Okay.

2 And I would imagine that the detectives with Largo
3 Police Department were eager to learn what, if anything,
4 you found during your processing of the Tundra.

5 A. Yes.

6 Q. But would it be fair to say that -- and -- and
7 I -- I don't want to put words in your mouth, but --
8 but -- that you were not present, nor did you
9 participate in conveying that information to Largo PD,
10 that you recall?

11 A. That's not my -- that's not my job to --

12 Q. Sure.

13 A. That's -- I mean, our -- our supervisors are
14 the ones who pretty much -- or I guess they call it the
15 liaison between the people doing the crime scene
16 processing and the detectives.

17 Q. Okay. All right.

18 MR. BRUNVAND: I'm going to pause for a
19 second, and I'm going to let Mariko Fujimura be
20 rescheduled as well, so give me a second.

21 (Off-the-record conversation was held.)

22 Q. (By Mr. Brunvand) Okay. Let me see if
23 there's anything else as to --

24 The items that are set forth in your report on
25 Page 2, and this is to Supplement 21, that you removed

1 from the vehicle; did you photograph all those items?

2 A. We removed them all to be photographed, so...

3 Q. So either -- either you or someone else would
4 have photographed them?

5 A. Yes.

6 Q. Okay.

7 Then it appears that you did some touch DNA
8 swabbing?

9 A. Yes.

10 Q. And beyond doing those swabs in the general
11 areas that -- that are indicated, you do anything else
12 as it relates to DNA?

13 A. There were some blind swabs done for -- for
14 possible blood, not -- not touch DNA, but for possible
15 blood.

16 Q. Okay. All right. Tell me about that.

17 A. Blind swabbed the areas listed in my report
18 here: Running board, the front floor mat of the
19 passenger side, passenger headrest and the passenger
20 side of the center console.

21 Blind swabbing, basically, you can't see anything,
22 but you're just blind swabbing the areas and then
23 testing those swabs for possible blood, again using
24 phenolphthalein.

25 And the only positive result we got in there was

1 the -- the passenger side of the center console.

2 Q. Okay. And what did you do with that positive
3 result?

4 A. That area is swabbed again and collected to be
5 sent off for further analysis, so...

6 Q. Okay. So -- and so the positive on that,
7 again, is -- is a presumptive?

8 A. Yes.

9 Q. And then someone else will tell us whether or
10 not that, in fact, turned out to be blood or not.

11 A. Correct.

12 Q. Anything else of significance as it relates to
13 the Dodge Ram that we haven't discussed?

14 A. The what?

15 Q. Not -- I'm sorry. The -- the Toyota Tundra.
16 I don't know why I said Dodge -- Dodge Ram.

17 A. I don't know, but I'm like, I wasn't present
18 for that vehicle, so I don't have anything for you
19 there.

20 Q. No. As to the -- as to the Tundra, anything
21 else that we need to discuss?

22 A. I don't have anything, but anything else --
23 the passenger side of the vehicle.

24 Q. Right.

25 A. That was negative. I mean, basically, what's

1 in my report here.

2 Q. Okay. All right.

3 So the next supplement is 28. And where does --
4 where does -- so -- so you're dispatched -- the date of
5 this is March 25th and you go to --

6 A. Yes.

7 Q. -- 34 West Orange Street.

8 A. Yes.

9 Q. And it appears that you arrive at 1649 hours?

10 A. That is correct.

11 Q. Okay. And what do you see when you arrive at
12 the scene?

13 A. Responded up there and Tarpon Springs PD had
14 stopped the vehicle. We went there for --
15 Detective Bolton from Largo PD was there, along with a
16 couple other detectives. I don't remember exactly who,
17 and it was in reference to a red Toyota.

18 Q. A red Toyota Corolla?

19 A. Yes, sir.

20 Q. Okay. Now, did you see Dr. Kosowski when you
21 arrived at that scene?

22 A. If I saw him, it was through the window. He
23 was in the back of one of the cruisers. But, yeah,
24 that's about all I can tell you about that.

25 Q. What, if anything, did you know at that time

1 as far as the status of Dr. Kosowski?

2 A. Other than he was in the back of the -- the
3 cruiser, I really didn't -- I mean, I didn't know if he
4 was being detained, if he was arrested. I mean -- yeah,
5 I -- I didn't know what his status was at that point.

6 Q. Did you know whether or not this related to
7 Steven Cozzi?

8 A. I know it was all related to this case, yes.

9 Q. Okay. All right.

10 Did you know whether or not Dr. Kosowski was a
11 person of interest at that time?

12 A. I can only go by the fact that the vehicle was
13 stopped, and we were dispatched up there to -- what his
14 involvement was in -- specifically related to this, I --
15 I don't know --

16 Q. Okay.

17 A. -- at that time, so...

18 Q. Did -- did you know his name prior to coming
19 up there?

20 A. I don't think so.

21 Q. Okay. All right.

22 Was it your impression at that time that -- well,
23 the -- the person that was in the back of the patrol
24 car, did it seem like he was free to leave?

25 A. I couldn't say that.

1 Q. Okay.

2 A. I mean, I've -- I've been on calls before with
3 people in the back of the patrol car, and they were
4 simply in the back of the patrol car.

5 Q. Uh-huh.

6 A. Or -- I -- I mean, I don't know. We've had
7 passengers that have been free to leave. We've had
8 drivers that have been free to leave. I couldn't tell
9 you what his status was, so...

10 Q. All right. That's -- that's for someone else
11 to --

12 A. That's --

13 Q. -- to --

14 A. Yeah, that's -- that's not my level of
15 expertise and that's above my pay grade.

16 Q. Sure.

17 But, certainly, he was in the back of a patrol
18 vehicle.

19 A. Right. Well, generally, they never put
20 anybody in the front, so...

21 Q. Right. Right, but, I mean, then the doors
22 were closed; right?

23 A. Yeah. But --

24 Q. Okay.

25 A. -- regard -- regardless of your status in the

1 investigation, they never put you in the front.

2 Q. All right. All right.

3 So how long would you say you were there on --
4 at -- at 34th Orange Street?

5 Well, it look -- it looks like it says -- let me
6 make sure I'm reading the right one here. It says you
7 arrived at 1649 and then time completed 1917.

8 A. Yeah. The time completed would be basically
9 after I got back to our forensic garage where the
10 vehicle was stored --

11 Q. Okay.

12 A. -- and, of course, that includes drive time
13 from up there.

14 Q. Sure.

15 A. And Bradford Towing, they must have the
16 slowest tow truck on the planet. I don't think that guy
17 can do over 40. It was a long drive back.

18 But, we were maybe out there an hour total. I -- I
19 mean, I don't really know.

20 Q. Did you observe any of the Largo Police
21 Department officers -- did you observe them searching
22 any part of the Toyota Corolla while you were there?

23 A. Not that I recall. I don't know.

24 Q. Do you --

25 A. I don't -- I don't -- I don't recall, 'cause I

1 took photographs outside and inside and after we opened
2 the vehicle, I don't know -- I don't recall specifically
3 what they did or didn't do. So I -- I can't speak to
4 that.

5 Q. Okay. Did you -- did you overhear anyone from
6 Largo Police Department make statements about the fact
7 that they were waiting for a search warrant?

8 A. They read a warrant for the vehicle while I
9 was there.

10 Q. Okay.

11 A. Largo 2. As far -- as far as waiting for
12 anything, like I said, they -- they read it prior to
13 opening the -- opening the vehicle for me to photograph
14 the inside or anything like that; so I don't know about
15 waiting for.

16 Q. Okay.

17 There is a -- there is a -- on the body cam videos,
18 there is a -- a time period prior to the arrival of the
19 search warrant where law enforcement reaches into the
20 car, opens the trunk of the car, and you can hear
21 someone make a statement about, you know, not -- don't
22 we have to wait for a warrant or something to that
23 effect.

24 Do you recall being there and hearing any of that
25 or seeing --

1 A. I --

2 Q. -- that?

3 A. No. But --

4 Q. Okay.

5 A. -- like I said, I don't know how long -- I
6 don't know what the time span between them being there
7 and us arriving on scene. I have no idea of what's
8 going on with their body camera.

9 Q. Okay.

10 Let me go to the next supplement, which is
11 Supplement 30.

12 A. Thirty-five.

13 Q. I'm sorry. Yeah. I'm sorry. It's Supplement
14 35, but it's --

15 A. Thirty -- 30 must be the one with the Dodge.

16 Q. It's on March 30th. It's on March 30th.

17 That's where I got it --

18 A. Yes, sir.

19 Q. -- from.

20 So this occurs on March 30th. It appears that --
21 it says time arrived at 1227. Time completed at 1439.
22 And it indicates that you -- you were there to document
23 the removal of the event data recorder, the EDR, from
24 the Toyota Corolla. Is that accurate?

25 A. Yes.

1 Q. Okay. And then you photographed the vehicle,
2 copy of the search warrant, and each step of the process
3 as the EDR was removed.

4 Do you recall the time or do you know the time that
5 the search warrant was initiated as it relate -- relates
6 to the Corolla on the 30th?

7 A. Pretty much we all entered the building
8 together.

9 Q. Uh-huh.

10 A. So whatever time my dispatch time was.

11 Q. You mean the -- the -- the arrival time you
12 mean?

13 A. Yeah, the arrival time. I'm sorry.

14 Q. 1643?

15 A. No, the -- the 1247.

16 Q. I'm sor -- I'm sorry, I'm sorry. I skipped to
17 the -- I was looking at the wrong report. I'm
18 getting -- getting this all confused. One second here.

19 Right, the 1227.

20 A. Yeah. The -- our building, other secure
21 facility where this vehicle was stored, we all entered
22 the building together 'cause Largo wouldn't have access
23 without us. They arrived there with the warrant and
24 everything, and our digital forensics detective. And
25 then they executed the warrant for him to be able to

1 remove the EDR from the vehicle. And I just
2 photographed him -- I photographed the inside of the car
3 step-by-step as he kind of took the -- the EDR out of
4 the vehicle.

5 Q. Okay.

6 The -- the images that I have, when I'm -- when I'm
7 looking at the photos you took, I can't see the -- the
8 metadata on -- on those images, I don't believe.

9 You -- you have the ability to look at the metadata
10 for all your photos; right?

11 A. I'm sure our photo lab does. I don't know
12 what I can -- what I can see on my program when we view
13 our photos. But --

14 Q. Okay.

15 A. -- anything like that, our photo lab would
16 have access to.

17 Q. Right. So the original photos should
18 definitely have all that information. It usually has
19 the exact time that they're taken, as well as GPS
20 coordinates and that kind of stuff, or at least -- at
21 least the time and date and assuming that the --

22 A. Time and date, I -- yeah. GPS and all that, I
23 don't know about that, but --

24 Q. And I -- what -- which model did you have?
25 Nikon what?

1 A. It's like a 5600.

2 Q. Yeah. I --

3 A. It's -- it's far from new.

4 Q. Okay. So maybe that doesn't have it.

5 But whatever -- whatever metadata is there that
6 should still be preserved and so if you wanted to
7 confirm certain times as to when certain photos were
8 taken, such as, you know, the -- the beginning of the
9 search warrant, you should be able to look that up;
10 right?

11 A. Yeah, they should have -- they -- they have
12 access to stuff like that.

13 Q. Let me -- let me just take a look. Let me go
14 out of these photos and go back to --

15 A. I mean, I don't know -- I don't know what you
16 get on -- on your side for --

17 Q. Yeah, I -- on our side, I think we just have
18 the images and we don't have the -- you know, maybe
19 Nathan can correct me on that, but I don't think we have
20 access to the metadata.

21 MR. VONDERHEIDE: I -- Bjorn, I think you do,
22 because I gave you the exact same thing I have.

23 MR. BRUNVAND: You think we -- you think I do?

24 MR. VONDERHEIDE: Yeah. 'Cause if you go
25 to -- if you right click -- I'm just right clicking

1 on the Tundra picture of -- you know, one of the --
2 with the navigation screen up --

3 MR. BRUNVAND: Uh-huh.

4 MR. VONDERHEIDE: -- click on it, it's 79Y,
5 his badge number and then 79. Right click it. It
6 says March 30th at 1:59 p.m.

7 MR. BRUNVAND: Very good.

8 MR. VONDERHEIDE: So you'll -- I -- you --
9 you -- I gave you the same thing I have, so it
10 should work for you.

11 MR. BRUNVAND: Okay. Perfect. So we should
12 be able to do that. I -- that's helpful. That's
13 helpful.

14 Okay. It looks like we have Kristi Klotz.
15 What time is it? Yeah, I'm going to -- I'm going
16 to reschedule her as well. Let me -- let me pause
17 for a second.

18 (Off-the-record discussion was held.)

19 MR. BRUNVAND: We're getting close to being
20 done, I think. I just want to take a look at some
21 additional photos.

22 Let me see here. O, P, Q.

23 Q. (By Mr. Brunvand) Okay. I think the next set
24 of photos is the Y series, maybe. I'm gonna go ahead
25 and -- and open those up. And I believe there's 108

1 photos in that series, is that -- is that consistent
2 with what your records are showing?

3 A. Yes.

4 Q. All right. Let me bring that up.

5 Okay. So this is the March 30th search warrant
6 incident; correct?

7 A. Yes, sir.

8 Q. All right. And I don't know how to do it
9 here, but let me just -- let's see here. But the first
10 photo is the pho -- the search warrant itself, and so
11 whatever the metadata shows as far as the time on that,
12 that would be the time when this started; correct?

13 A. Yeah. Whatever time the photo was -- yeah.

14 Q. Assuming that --

15 A. The cam -- according to the camera, whatever
16 it says.

17 Q. Right.

18 And -- and I assume that because you use the
19 cameras for forensic work, that it's important to make
20 sure that the date and the time on the camera is -- is
21 up to date.

22 A. Yeah, we have -- they go through our cameras,
23 like, once a year.

24 Q. Okay. All right.

25 So, I mean, generally, you -- you know, there's

1 always chances that something might be wrong, but,
2 generally, you would want to --

3 A. Generally speaking, yes.

4 Q. I'm sorry?

5 A. Generally speaking, yes.

6 Q. Okay. All right.

7 All right. What -- I'm looking at -- can you
8 see -- you -- you can see what -- what I'm looking at;
9 right? Num --

10 A. Right.

11 Q. Image Number 12; what are we looking at here,
12 if you recall?

13 A. That's one of the panels he's pulling loose to
14 get at this event -- event data recorder.

15 Q. Okay. All right.

16 And when you guys are doing this, has the car
17 already been processed by others?

18 A. By this time, everything's done with the
19 vehicle except for this part of it.

20 Q. Okay.

21 A. So any other processing that was done of the
22 vehicle was done prior to this, because that would have
23 been done in our processing garage. The one over -- the
24 14605 location --

25 Q. Right.

1 A. -- this is an additional location we have for
2 vehicle storage, these vehicles are put there after they
3 were processed.

4 Q. Okay.

5 Are you taking photos of -- of the phone, the call
6 history and -- and -- but this looks -- this is back to
7 the -- this -- this appears to be the Tundra, no?

8 A. Right. The -- the photo you scrolled by a few
9 back was the -- I think that was the -- the one for the
10 Tundra, cause we already showed the search warrant for
11 the Toyota.

12 Q. Okay. So --

13 A. This is the one for the -- for the Tundra, if
14 I remember correctly.

15 Q. So 50 is for the Tundra; right?

16 A. Yes.

17 Q. And again, the time -- the -- the metadata
18 should have the exact time that that search started;
19 right?

20 A. That that photo was taken, yes.

21 Q. Right. And is that the -- and -- and that's
22 the first thing you do before you start the sear --
23 the -- going through the car; right?

24 A. Right.

25 Q. Okay.

1 And -- and are both of the vehicles in the same
2 location?

3 A. Yes. One was parked right behind the other
4 one.

5 Q. Okay. And who else, if anyone, has access to
6 that area.

7 A. I guess our -- well, our Property and Evidence
8 Division, 'cause they have to open it up for us to get
9 in there 'cause --

10 Q. All right.

11 A. -- this is -- this is part of the Property and
12 Evidence Division next-door.

13 Q. All right. Now, if -- if -- if
14 Detective Bolton wanted to go and look at the Tundra
15 or -- or the -- or the Corolla, how does he go about
16 doing that?

17 A. He would have to get access with one of our
18 Property and Evidence people --

19 Q. Okay.

20 A. -- to get badged into that area.

21 Q. And is that -- is there some sort of a log
22 that would tell us if and when he would have been there
23 to look at the evidence?

24 A. I'm -- I'm thinking there's a -- and I'm not a
25 hundred percent sure. If he would go with somebody from

1 Property and Evidence, I don't know if they'd log them
2 in, but I -- I would suspect they -- they do, because
3 it -- it would be a custody thing. I would --

4 Q. Okay.

5 A. I -- and, again, I'm not a hundred percent
6 sure, but anytime anybody accesses that building with
7 one of our key cards, there's a record of that.

8 Q. So you -- so if you're -- if you're working
9 with the sheriff's department, such as yourself, you
10 have a key card and that keeps track of you coming and
11 going.

12 A. Right. Now -- like, I don't have access to
13 that building.

14 Q. Oh, you do not?

15 A. Our Property -- our Property and Evidence
16 people. In order us -- for us to get in there, just
17 like in order us to get past anything in the lobby of
18 Property and Evidence, they have to let us in or they
19 have key card access to control who's in the evidence
20 section of their building.

21 Q. Okay.

22 Is there anything else that you've done in this
23 case that we've not discussed and that's not documented
24 in your reports?

25 A. Nothing I can think of.

1 Q. Any series of photographs that you took
2 that -- that we've not reviewed or that -- that are not
3 part of -- have not been part of today's deposition?

4 A. No.

5 Q. Okay.

6 MR. BRUNVAND: I don't have any other
7 questions. I don't know if -- Amanda, do you have
8 any questions?

9 MS. SELLERS: Nope, I do not.

10 MR. BRUNVAND: Nathan?

11 MR. VONDERHEIDE: I don't have any questions.

12 MR. BRUNVAND: Alexandra?

13 MS. SPARADO: No questions. Thank you.

14 MR. BRUNVAND: All right. Thank you very
15 much.

16 I apologize it took much longer than what you
17 were scheduled for, and I hope that did not
18 interfere with your day.

19 THE WITNESS: All pays the same.

20 MR. BRUNVAND: The -- do you want to read or
21 waive?

22 THE WITNESS: Read.

23 MR. BRUNVAND: Okay. You're going to have to
24 give --

25 THE NOTARY: What's a good email address?

1 MR. BRUNVAND: -- contact to the court
2 reporter.

3 (Discussion off the record.)
4

5 THEREUPON, the virtual deposition concluded at
6 11:53 a.m.
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ERRATA SHEET

IN RE: State of Florida versus Tomasz Kosowski

DATE TAKEN: December 6, 2023

WITNESS: ROBERT BRIGGS

Page	Line	Correction	Reason
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Under penalties of perjury, I declare that I have read
the foregoing document and that the facts stated in it
are true.

DATE (ROBERT BRIGGS)

CERTIFICATE OF OATH


STATE OF FLORIDA

COUNTY OF PINELLAS

I, the undersigned authority, certify that
ROBERT BRIGGS personally appeared before me and was duly
sworn on December 6, 2023.

Witness my hand and official seal this
23rd day of December, 2024.




KIMBERLY G. KITTRELL
Notary Public, State of Florida
Commission No.: HH 99385
Expiration Date: 3/20/25

1 REPORTER'S DEPOSITION CERTIFICATE

2 STATE OF FLORIDA

3 COUNTY OF PINELLAS

4 I, Kimberly L. Renfroe, Registered Professional
5 Reporter, certify that I was authorized to and did
6 transcribe the electronically recorded virtual
7 deposition of ROBERT BRIGGS; that a review of the
8 transcript was requested; and that the transcript is a
9 true and complete record as I understood it to be.

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

15 Dated this 23rd day of December, 2024.

16
17 
18 KIMBERLY L. RENFROE, RPR
19 Registered Professional Reporter
20
21
22

23 (Transcript ordered by Jeanette Bellon, Esquire, on
24 December 10, 2024.)
25

December 23, 2024

Forensic Specialist Robert Briggs
RBriggs@PCSONet.com

Dear Specialist Briggs,

Your electronically recorded deposition taken in the case of 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 until January 30, 2025.

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,

Kimberly L. Renfro, RPR