

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

CASE NO.: 23-02935-CF

STATE OF FLORIDA,

Plaintiff,

vs.

TOMASZ KOSOWSKI,

Defendant.

VIDEOCONFERENCE

DEPOSITION OF: DETECTIVE COLIN BOLTON

DATE TAKEN: June 12, 2024

TIME: 10:00 a.m. to 4:36 p.m.

PLACE: Via Zoom videoconference

STENOGRAPHICALLY REPORTED BY:

Lori A. Seiden, RPR, FPR-C

Notary Public, State of Florida at Large

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1 APPEARANCES:
(Appearing via Zoom videoconference)

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6 Appearing on Behalf of the Plaintiff

7
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11 Appearing on Behalf of the Defendant
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1 The deposition of DETECTIVE COLIN BOLTON was taken
2 pursuant to notice by counsel for the Defendant on the
3 12th day of June, 2024, commencing at 10:00 a.m., via
4 Zoom videoconference. Said deposition was
5 stenographically reported by Lori A. Seiden, RPR,
6 FPR-C, Notary Public, State of Florida at Large.

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8 DETECTIVE COLIN BOLTON,
9 a witness, having been duly sworn to tell the truth,
10 was examined and testified upon his oath as follows:

11 THE WITNESS: I do.

12 DIRECT EXAMINATION

13 BY MR. BRUNVAND:

14 Q. Good morning, Detective Bolton. We've been
15 recording these depositions. Are you okay with that?

16 A. That's okay.

17 Q. All right. Start the recording.

18 All right. Detective Bolton, you've been
19 sworn. My name is Bjorn Brunvand. I represent Tomasz
20 Kosowski.

21 If you could, please state your full name and
22 rank.

23 A. My name is Colin Bolton. I'm employed as a
24 detective with the Largo Police Department.

25 Q. And how long have you been so employed?

1 A. I've been with the Largo Police Department just
2 shy of 11 years.

3 Q. And how long have you been a detective?

4 A. A little over two years.

5 Q. What were you doing before you became a
6 detective?

7 A. I worked as a patrol officer.

8 Q. Okay. This morning I had requested an updated
9 complete report from your office, which Mr. Vonderheide
10 provided. I think he copied you with it as well.

11 A. Yes.

12 Q. So the page numbers from what I had before and
13 now are somewhat different. For example, I have a
14 supplement, or I have a report that's authored by you
15 that starts out on 3/21/2023 at 1332, acting sergeant,
16 Detective Hunt, notified me in person that he had
17 received a request and so forth.

18 That report and the original batch that I had
19 started on page 161 and is now on page 190.

20 A. Okay.

21 Q. Do you see that?

22 A. So the way our records management system works
23 is that every time a report is printed, the page numbers
24 are to be going different every time something is added
25 to it, so...

1 Q. Okay. So what I want to do is, I want to make
2 sure that I have everything you have authored.

3 So what is the first report in this package
4 starting on -- in our most recent package? Are you able
5 to identify that by page number?

6 A. By page number? I just got the most updated
7 copy this morning as well.

8 Q. Okay.

9 A. I can tell you that the supplement you just
10 mentioned, it starts on 321 at acting Sergeant Hunt.
11 That would be the first supplement that I authored.

12 Q. Okay.

13 A. And then the most recent, according to the
14 newest, would be your page 319. That starts on
15 3/27/2024.

16 Q. Okay. That's the most recent, 319. Okay.

17 What about -- and that appears to be a one-page
18 supplement.

19 What about in between?

20 A. In between, numerous supplements. I have quite
21 a few.

22 Q. Okay. So why don't we -- can we just go
23 through them to make sure that I have everything? So
24 the first one that starts on page 90 -- I mean 190, and
25 the most recent for now, are you not seeing that same

1 page number on yours?

2 A. Let me download this copy.

3 Q. Okay.

4 A. And I'll just have it as a PDF, and I'll
5 just -- page 1 is -- okay. Page 190.

6 Q. Right.

7 A. Yes. That's what I have as the first
8 supplement of mine.

9 Q. Okay. And that particular report, how many
10 pages is that first report of yours?

11 A. That is -- that goes from page 190 -- that goes
12 from page 190 to 210.

13 Q. Okay. And, then, do you refer to these as
14 supplements, I assume?

15 A. Yes, sir.

16 Q. Okay. The next supplement, does it go from
17 211? Is that just one page, 211?

18 A. So the next the supplement should start on
19 3/22/2023, at approximately 1050, is the first line that
20 I have for that, but I see that 211 starts on 3/23.

21 Q. What did you just say it should be?

22 A. So the next supplement in -- so chronologically
23 of the events and as I wrote them, the next supplement I
24 have is -- starts on 3/22/2023 at approximately 1050.

25 Detective Hunt and I responded to Cozzi and Montgomery's

1 residence, but I see that 211 in this copy starts on
2 3/23 it says 3023, but on 3/23, myself and -- so there's
3 a day that's not either in there or chronologically is
4 as the events occurred.

5 Q. Okay. So as we look at it in this -- and it
6 appears that we're missing for the time being, we're not
7 saying that it's not going to be in this document, but
8 there it jumps over 3/22 to the 3/23 supplement on
9 page 211. And my question would be: Is that a one-page
10 supplement?

11 A. It is the supplement regarding the events on
12 3/23 a one-page supplement?

13 Q. Yeah. It's kind of confusing to me.

14 A. Yeah, this is. So what I have is written for
15 that supplement starting on 3/23. I have one, two,
16 three, four, five pages.

17 Q. Okay. So basically it's 211 through 215?

18 A. Let me double-check and make sure that all that
19 is --

20 MR. VONDERHEIDE: Hey, guys. Can I interrupt
21 real quick?

22 THE WITNESS: Sure.

23 MR. VONDERHEIDE: So on the 3/22/2023, I think
24 that starts at page 253 for some reason. Can you,
25 Colin, download just your report in isolation and

1 send us a PDF of that? Is that possible?

2 THE WITNESS: I mean, I would have to have
3 records, go through them individually and pull out
4 my supplements.

5 MR. VONDERHEIDE: Okay.

6 THE WITNESS: Yeah. The records management
7 system is incredibly difficult to work with.

8 MR. VONDERHEIDE: Okay. Never mind then. That
9 was my contribution. Thank you.

10 MR. BRUNVAND: Okay. All right. So Nathan,
11 what was the page that you referred to as for the
12 3/22?

13 MR. VONDERHEIDE: Page 253 looks like that's
14 what you were talking about. "On 3/22/2023, at
15 approximately 10:50, Detective Hunt and I responded
16 to Cozzi and Montgomery's residence."

17 MR. BRUNVAND: Okay. I see it.

18 BY MR. BRUNVAND:

19 Q. Detective Bolton, can you go to 253?

20 A. Yep. I have it up.

21 Q. And it looks like -- looks like that particular
22 report goes through 259, maybe?

23 A. Yep, that's correct.

24 Q. Okay. I'm going to -- I'm going to put that in
25 the stack here out of order.

1 And then we had 3/23, which is 211 through 215.

2 What's the next supplement? There's one here
3 that starts on 3/24 on 216?

4 A. Yep.

5 Q. You said on 3/24, and that starts 216?

6 A. Yeah.

7 Q. And then looks like that's a two-page
8 supplement. Is that accurate?

9 A. Give me one second. I'm just going to write
10 these down as we go in case I --

11 Q. Sure.

12 A. 216, yes, that should be just two pages.

13 Q. Okay.

14 A. 216 and 217.

15 Q. And then the next one I have is on -- starts on
16 page 218. It's 3/25. And that appears to be three
17 pages. I'm sorry. Four pages.

18 Does that appear to be the next supplement in
19 order?

20 A. One, two, three, four. I have 218 through 221.

21 Q. Correct.

22 A. Yep, that's it.

23 Q. All right. The next supplement that I have in
24 here, it starts on March 27th and is page 222.

25 Is that the next one in your --

1 A. Yep.

2 Q. And that looks like it's a two-page report. Is
3 that accurate?

4 A. Yes.

5 Q. Okay.

6 A. 222 and 223.

7 Q. The next one I have after that is 228. I mean
8 3/28 is the date. March 28th, 2023. And it's page 228.

9 A. 228, yes.

10 Q. And that appears to be, also, a four-page
11 report going through page 231.

12 A. 228 through 231. Yep, that's correct.

13 Q. Okay. The next one I have with your name on it
14 is March 29th, 2023, and it starts on 232. That looks
15 like it's just a one-page report.

16 A. That's correct.

17 Q. The next one I have is 3/30/23. That starts on
18 page 234.

19 A. 30, yep.

20 Q. That appears to be a two-page supplemental
21 report. Is that accurate?

22 A. Yes, that's two pages.

23 Q. Okay. The next one I see is a March 31st, 2023
24 report. Starts on page 239. And that appears to be a
25 three-page supplemental report.

1 A. One, two, three. It ends at -- yep. Yes, that
2 is correct.

3 Q. The next one I have is an April 1st date, 242,
4 and that's a one-page supplemental report.

5 A. April 1st, which date, or I'm sorry, which
6 page? 242?

7 Q. Yeah.

8 A. Yes, 242, one page.

9 Q. The next one I see with your name on it starts
10 April 2nd, 2023. It appears to be a two-page report;
11 243 to 244.

12 A. Yes, that's correct.

13 Q. Okay. And everything seems to be in order with
14 the exception of that first or the second report; right?

15 A. Everything -- I'm sorry. Say that again.

16 Q. Everything we discussed so far appears to be in
17 order with the exception of that March 22nd report that
18 was out of order in this file.

19 A. Correct.

20 Q. Okay. The next one I see is March -- I mean,
21 is April 4th, 2023. Appears to be a one-page report;
22 page 245?

23 A. 245, yep.

24 Q. All right. The next one that I see is an
25 April 7th start of the report, and it appears to go for

1 three pages from 246 to 248.

2 A. 7 -- yes, that was 244 it started on? The 244
3 to 248 or 246 to 248.

4 Q. That's correct, 246 to 248.

5 A. Yep.

6 Q. Okay. The next one I have is April 11th, 2023,
7 and it starts on page 249. I'm not sure how many -- I
8 don't know if that's a one-page or if that's a
9 three-page.

10 A. So 4/11 should be just 249.

11 Q. Okay. So 4/11 is just 249. That's one page.

12 The next supplemental report starts on 250.
13 And that starts on April 20th, 2023. And that appears
14 to be a two-page report?

15 A. Correct.

16 Q. Okay. The next one I see is also a 4/20/23.
17 This appears to be identical to the one that's set forth
18 on page 250 and 251, is 260 and 261?

19 A. 260 and 261. Yeah. In my printed copy I have,
20 it appears to be duplicates of it.

21 Q. Okay.

22 A. Okay.

23 Q. So I'm going to pull out of my package 260 and
24 261, because that's already covered.

25 The next one I have is 262. It's a 4/21

1 report. I believe it's a one-page report.

2 A. Correct.

3 Q. The next one I have is 263, and it starts on
4 April 26th, 2023, and appears to be a one-page report.

5 A. Yes.

6 Q. The next report that I have starts on 264.
7 It's April 28th, 2023. "I received information from the
8 National Park Service." And that appears to be a --
9 appears to be a report -- supplemental report that goes
10 from page 264 to 277.

11 A. 264 to -- that's correct.

12 Q. Okay. The next supplemental report that I have
13 is a May 10th supplemental report. Starts on page 278,
14 and looks like it goes through page 281.

15 A. 281. That one is going to go to -- that one is
16 going to go to page 280.

17 Q. 280. I'm sorry. Yeah, it says 280. And then
18 there's a one-page report that starts on 281.

19 A. Correct. The 5/11 on 281 is just one.

20 Q. Okay.

21 A. Yeah.

22 Q. All right. Very good.

23 The next one I have is May 30th. It's
24 page 285.

25 A. Yep.

1 Q. I believe it's a one-page report.

2 A. 5/30 is, yes, a one-page.

3 Q. Okay. The next one I have in this starts on
4 286. It's June 13, 2023. And that appears to be a
5 two-page report.

6 A. On June 13th, do you have page 286?

7 Q. Yeah. It's 286 to 287.

8 A. 286 to 2 -- correct.

9 Q. Okay. The next report that I have is
10 June 19th. It looks like it's maybe a one-page report.
11 It's page 290.

12 A. 290 is -- that should be a two-page report, and
13 that will end -- that will end on 291.

14 Q. Okay. All right. And the second page is the
15 one that says, "6/22/2023, I received the subpoena
16 return"?

17 A. Correct.

18 Q. The next one I have is July 7th, 2023,
19 page 292, one-page report.

20 A. Correct.

21 Q. The next one I have is a -- I believe a
22 one-page report for July 24th, 2023, page 294.

23 A. Correct.

24 Q. The next one I have is August 1st, 2023, and
25 it's a two-page report from 295 to 296.

1 A. Yep, that's it.

2 Q. The next one I have is August 22nd, 2023. It
3 appears to be a one-page report on 298.

4 A. Yes, sir.

5 Q. Then there's a second one-page report on
6 August 22nd. There's a meeting with Michael Montgomery
7 with page 299?

8 A. Correct.

9 Q. And the next one I have appears to be
10 September 12th, 2023, page 309. Appears to be a
11 one-page report.

12 A. Yep.

13 Q. The next one I have is October 6th, 2023. It
14 looks like it's a two-page report starting on 310 to
15 311.

16 A. 310 to 311, yes.

17 Q. The next one I have appears to be an
18 October 17th, 2023, report. It's a one-page
19 supplemental report starting on page 312, I believe.

20 A. Yes.

21 Q. Okay. The next one I have is another
22 October 17th, 2023. It starts out, "I received an email
23 response from the SAO reference Subpoena 23608AYA." And
24 that also appears to be a one-page report.

25 A. Yes. Yes.

1 Q. Okay. The next one that I have is
2 October 30th, 2023, page 314. Appears to also be a
3 one-page report.

4 A. Correct.

5 Q. Okay. The next one I have is November 17th,
6 2023. Also appears to be a one-page report on page 315.

7 A. Yep.

8 Q. The next one I have appears to be December 7th,
9 2023. And that appears to be a one-page report on
10 page 318 of the most current printout.

11 A. Correct.

12 Q. And then the next report that I have appears to
13 be a one-page report, 319, which is 3/27/24 report
14 reference an email from Nathan Vonderheide.

15 A. Yes.

16 Q. Okay. Are there any other reports that you
17 have authored that we have not discussed so far this
18 morning?

19 A. No, none that have been submitted.

20 Q. What does that mean, "none that have been
21 submitted"? What's that mean?

22 A. I still have some things in process and some
23 documents I'm waiting on that I just -- I haven't
24 authored a supplement because it's not complete yet.

25 Q. Okay. What are those items?

1 A. So I sent some items out to the lab just the
2 other day. I met with the security or the owner of the
3 Ironshield Security who did the security for Blanchard's
4 office. So just things that aren't complete, things
5 that haven't been finalized yet.

6 Q. Okay. And the things that were submitted to
7 the lab the other day, what are those?

8 A. There were two swabs of blood from the office
9 bathroom.

10 Q. Okay.

11 A. And then there is I'll be sending off a firearm
12 from Mr. Kosowski's residence.

13 Q. For testing as well?

14 A. Correct.

15 Q. For serology, or what kind of testing?

16 A. Serology and DNA.

17 Q. Okay. All right.

18 When I review your report, your supplemental
19 reports, if there are statements attributed to another
20 person and those statements are in quotation marks, can
21 I assume that those are word-for-word what that person
22 said?

23 A. Yes.

24 Q. And likewise, if there are statements
25 attributed to another person that are not in quotes, can

1 I assume that those are summaries of what those people
2 told you --

3 A. Correct.

4 Q. -- not necessarily word-for-word?

5 A. Correct.

6 Q. Okay. Detective Bolton, the patrol officers
7 involved in this case would faithfully, if not all the
8 time, wear Axon body-worn camera recording devices. Is
9 that accurate?

10 A. Yes.

11 Q. Okay. As a detective, do you ever wear the
12 same type of recording device?

13 A. Occasionally, but our policy doesn't require
14 it.

15 Q. Okay. So you have one that's issued to you,
16 but you don't have to use it?

17 A. Correct.

18 Q. Okay. Do you know whether or not you used it
19 during this case?

20 A. I did not use my own. I think at one point I
21 borrowed Detective Wedin's.

22 Q. Okay. When was that?

23 A. That would have been during my contact with
24 Mr. Kosowski.

25 Q. Okay. All right. Other than doing the contact

1 with Dr. Kosowski, did you at any other time use an Axon
2 body camera recording device?

3 A. I don't recall. If I did, it would have
4 been -- it would have been uploaded.

5 Q. Okay. Okay. And it's solely at your
6 discretion; right?

7 A. I don't remember.

8 Q. Not uploading, but whether or not you're
9 wearing it.

10 A. Correct.

11 Q. Okay. All right. And the copy that I have of
12 this -- these reports does not have your signature nor
13 the supervisor's signature.

14 Can I assume that there is an original that has
15 both of those signatures on it?

16 A. We don't sign them.

17 Q. Okay. Not electronic or any other way?

18 A. No.

19 Q. So when it says "signature" on the bottom of
20 each page, it doesn't mean anything?

21 A. No.

22 Q. Okay. And how long has that been? Do you
23 know?

24 A. As long as I've been employed here.

25 Q. Okay. All right. I know that the --

1 originally when we receive some of the reports they had
2 not yet been authorized or signed off on whether it's
3 actually signed off or approved by a supervisor.

4 How do we know -- do we know that it's been
5 approved or has not been approved? I'm assuming some of
6 them say not supervisor approved and some of them don't
7 say that.

8 A. Correct. So, again, this is kind of a problem
9 with the records management system, is that
10 supplements -- and I couldn't tell you the size or the
11 volume that it takes, but trying to electronically
12 submit them through the system that we use, it will
13 crash it or it won't allow them to be submitted up to a
14 certain size.

15 Q. Okay. So the ones that say "not supervisor
16 approved," are those reports that were too big and they
17 wouldn't go through to the supervisor?

18 A. Correct.

19 Q. Okay. I assume that once you finalize your
20 reports you review them for completeness and accuracy?

21 A. I have.

22 Q. Okay. And do you do that when you first
23 complete the report?

24 A. As I'm going, yes.

25 Q. Sure. Sure.

1 So as you're going along and preparing a
2 report, but once a particular report is finalized, do
3 you review it once again just to make sure that there
4 are no significant mistakes or omissions in them?

5 A. I review it. Yeah, I review it periodically.

6 Q. Okay. Do you also review the reports, for
7 example, in preparation for today?

8 A. I did.

9 Q. Okay. And in reviewing the older reports that
10 we have just gone through, did you find any mistakes or
11 errors in your reports?

12 A. There's some grammatical and punctuation
13 errors, but actually factually, no.

14 Q. Nothing of substance?

15 A. Nothing of substance.

16 Q. Okay. All right. What about, are you noting
17 any significant omissions? That is anything that you
18 consider to be important or potentially important from
19 an evidentiary standpoint that you did not include in
20 the report.

21 A. No.

22 Q. Okay. All right. And presumably, in addition
23 to reviewing them in preparation for today, at least the
24 reports that were completed before the invest and the
25 start on this case, you would have reviewed as well for

1 the same purposes, accuracy and omissions; right?

2 A. Correct.

3 Q. Do you recall when you arrived at 1501 Belcher?

4 1501-B Belcher, I guess it is.

5 A. I do.

6 Q. When was that?

7 A. That was on March 31st shortly after 1:30 p.m.

8 Q. March, what date?

9 A. March 21st, 2023, shortly after 1:30.

10 Q. Okay. And who did you meet up when you arrived
11 at that time -- date and time?

12 A. Officer Bure.

13 Q. Okay. Was it considered to be a crime scene at
14 that time?

15 A. I don't believe we had considered it a crime
16 scene at the moment.

17 Q. All right. So did anyone at that point in time
18 wear any type of shoe covers when you guys, for example,
19 entered the bathroom?

20 A. No.

21 Q. Okay. Not you and not Officer Bure?

22 A. Not me, and I don't recall, but I don't believe
23 Officer Bure was wearing.

24 Q. Okay. What was the purpose of going into the
25 bathroom when you first arrived?

1 A. To see what exactly had been reported to
2 officers when they arrived so I could see it for myself.

3 Q. Okay. And what was your understanding of what
4 had been reported to officers?

5 A. Just very vaguely, that there was blood seen in
6 the bathroom.

7 Q. Okay. And what do you -- was there a -- was it
8 reported anything about the amount of blood that was
9 seen in the bathroom?

10 A. No, not initially.

11 Q. Had there been any comments prior to you going
12 into the bathroom that there did not appear to be a
13 significant amount of blood in the bathroom?

14 A. I don't recall exactly how it was put to me. I
15 know that when I was pointed to was first was just what
16 appeared to be a drop or two on the stall wall.

17 Q. Okay.

18 A. And then what appeared to be a swipe or
19 something that appeared to be blood on the exterior of
20 the door.

21 Q. Okay. All right. So would you agree that was
22 initially described and what you initially saw would not
23 be something you would describe as a lot of blood?

24 A. At first glance, it didn't appear to be a lot
25 of blood.

1 Q. Right. Right.

2 And, in fact, people, possibly yourself as
3 well, indicated as such during the early stages of the
4 investigation?

5 A. Correct.

6 Q. Okay. Excuse me. Were you wearing gloves when
7 you first entered the bathroom?

8 A. I was not.

9 Q. Who -- do you recall who opened the door to the
10 bathroom when you first entered the bathroom?

11 A. I don't. I don't recall if it was me or
12 Officer Bure.

13 Q. All right. Do you remember if Office Bure was
14 wearing gloves?

15 A. I don't recall.

16 Q. Okay. If there's a video of who opened the
17 door, would you agree that that would be the best
18 evidence of who actually touched the door handle and
19 opened it?

20 A. I would.

21 Q. Okay. After viewing the bathroom and where you
22 noticed some droplets of blood or what you believe might
23 be blood; right?

24 A. Yes.

25 Q. Was there anything else about the bathroom that

1 stood out to you when you went into the bathroom?

2 A. There was a very strong odor of cleaning
3 chemicals. I mean, the way I most am familiar with it
4 smelled like bleach. Like, very distinctly of bleach.

5 Q. Okay. Anything else?

6 A. There was some paper towels or shreds of paper
7 towels on the ground, and the cabinet doors to the
8 vanity was open.

9 Q. Paper towels or toilet paper on the ground?

10 A. I couldn't tell at an immediate glance.

11 Q. Okay. In the hallway before you enter or after
12 you left the bathroom, did you see any paper on the
13 floor in the hallway?

14 A. I don't recall.

15 Q. You were not recording any of this, but --
16 well, do you know whether or not Officer Bure was
17 recording it?

18 A. I believe she was.

19 Q. And what is your role in this case as far as
20 are you the lead detective on this case, or what was
21 your role in this case?

22 A. I was assigned as the lead detective, yes.

23 Q. And presumably, does that mean that in addition
24 to being familiar with what you actually did yourself
25 that you also had to be familiar with basically what

1 everyone else on the team does in the case?

2 A. Correct.

3 Q. Okay. Did that include you viewing all the
4 body cam footage from that day?

5 A. Yes.

6 Q. Okay. All right. And did all those
7 recording -- recordings appear to work properly and play
8 back properly with video and sound unless the sound had
9 been, you know, turned off by the officer?

10 A. From what I recall, it did.

11 Q. Okay. When did you review it? Do you recall?

12 A. I don't recall exactly when I watched it. It
13 might have been weeks or months later, but I don't
14 recall exactly when I watched it.

15 Q. Okay. All right. Was it over a period of
16 time, or did you, like, sit down and do it all in one
17 sitting?

18 A. It was over a period of time.

19 Q. Okay. So when you leave the bathroom, where do
20 you go next? What did you do next?

21 A. I believe I took an initial view of Steven
22 Cozzi's office.

23 Q. Okay.

24 A. Yeah. After that, I believe Officer Bure
25 showed me Steven Cozzi's office as they had found it.

1 Q. Okay. Did you speak with Mr. Blanchard at that
2 time?

3 A. I believe only in passing, but I don't -- not
4 in, like, a full interview.

5 Q. Okay. And so you basically -- you walked
6 through his office to get a view of the office. Then
7 what do you do?

8 A. Then I went to another office within the
9 building with Officer Bure to review surveillance
10 footage that she had been watching.

11 Q. Okay. While you were watching the surveillance
12 footage, do you recall discussing with Officer Bure the
13 amount of blood that was seen in the bathroom?

14 A. I don't recall the conversation.

15 Q. Okay. Do you recall expressing to Officer Bure
16 that you did not believe that there was a significant
17 amount of blood in the bathroom?

18 A. I believe it's possible, but I don't recall the
19 statement.

20 Q. Okay. If your statement is captured on video,
21 would that accurately reflect what you said?

22 A. It would.

23 Q. I think you said -- the best description I
24 think you gave of what you saw initially in the bathroom
25 was a few drops of blood.

1 A. I believe that's what I first saw and that's
2 what was first reported to me.

3 Q. Okay. And I'm assuming that you have been to
4 many scenes where there has been a murder -- many murder
5 scenes?

6 A. Several, yeah.

7 Q. Hold on one second. Put my phone on do not
8 disturb so it doesn't ring.

9 Would you agree looking back at it and based on
10 your background and experience that the blood that you
11 could see and/or the drops that you saw initially that
12 appeared to possibly be blood was not a significant
13 amount compared to what you may see at other scenes?

14 A. It didn't appear that way, right --

15 Q. Okay.

16 A. -- what was immediately visible or what stood
17 out.

18 Q. What was that?

19 A. What was immediately visible and what stood
20 out, what contrasted on the surfaces it was on didn't
21 appear to be initially a lot.

22 Q. Right. Okay.

23 Would you be able to quantify the blood that
24 you saw beyond just saying it was a few drops?

25 A. I couldn't.

1 Q. Okay. Do you know what color shirt Steve Cozzi
2 was wearing underneath his red sweater on March 21st,
3 2023?

4 A. I believe it was reported that he was wearing a
5 blue shirt.

6 Q. Okay. Did you, yourself, see that on video
7 surveillance?

8 A. I saw him on video surveillance. I don't
9 recall if I could see the -- if I could see the blue of
10 the shirt underneath his sweater that he was wearing.

11 Q. Okay. Do you recall who reported that it was a
12 blue shirt?

13 A. I don't.

14 Q. But you do recall someone indicating that he
15 was wearing a blue shirt?

16 A. Correct.

17 Q. All right. When you first view surveillance
18 video, is that the next thing you do, is review?

19 A. Yes.

20 Q. How long does that take?

21 A. I don't recall how long it took.

22 Q. Okay. Had items of interest already been
23 isolated for you on the video surveillance?

24 A. They had.

25 Q. Okay. And who had isolated those?

1 A. I believe Officer Bure had picked out two
2 instances of note to her.

3 Q. Okay. And what were those two instances?

4 A. So one was -- the first was Steven Cozzi
5 walking into the building.

6 Q. Okay.

7 A. And then the second was an unknown individual
8 that appeared to be wearing jeans and a T-shirt pulling
9 a wagon from the front door.

10 Q. Okay. From that -- the video of the unknown
11 individual, were you able to identify that person?

12 A. I was not.

13 Q. Okay. And even after arresting Kosowski, just
14 by looking at the video, would you be able to say that
15 that was Steven [sic] Kosowski?

16 A. I wouldn't.

17 Q. Can you see his face on the video?

18 A. I can't.

19 Q. Cannot?

20 A. No.

21 Q. Okay. There's multiple surveillance videos of
22 a truck traveling from the Belcher Road location to
23 Tarpon Springs.

24 A. Correct.

25 Q. Okay. Have you viewed all those videos?

1 A. I have.

2 Q. On those videos, are you able to see and
3 identify the driver of the truck?

4 A. No.

5 Q. Were you aware of a problem that had been
6 experienced around that building on Belcher Road
7 involving homeless people?

8 A. It was only thirdhand told to me, and I don't
9 recall who told me that.

10 Q. Okay. But information had been provided to you
11 that there were some issues with homeless people in that
12 area?

13 A. I've heard that, yes.

14 Q. Okay. The person that's seen on the
15 surveillance footage at 10:22 a.m. pulling a wagon,
16 you're given a little bit of description of that person.

17 Could you tell me again what you recall about
18 how that person appeared?

19 A. So it appeared to be a white male of an average
20 height, possibly around six feet, maybe, and average
21 build, not heavyset. Didn't appear overly skinny,
22 wearing jeans, a light-colored T-shirt, either blue or
23 gray. And give me one second. I had a couple other
24 descriptors.

25 Q. Sure. I'm assuming you're looking at your

1 supplemental report?

2 A. Correct.

3 Q. Which is fine. Okay.

4 A. Yeah. It appeared to be like a blue
5 short-sleeved T-shirt, a backpack, white surgical mask,
6 and a hat -- a ball cap hat.

7 Q. From looking at the surveillance video, could
8 you tell whether that person might have been homeless or
9 not from the video itself?

10 A. From the video itself, I think from just a
11 video of an individual would be impossible to tell if
12 they were homeless or not.

13 Q. Sure.

14 At some point, do you speak with Jake Blanchard
15 that morning?

16 A. I did.

17 Q. What does Jake Blanchard tell you?

18 A. He told me that he was aware of Steven's
19 presence in the office. Steven had gotten to the office
20 prior to him. He hadn't been really communicating with
21 him directly in the morning. He was working with his
22 other employee. He believed that Steven had gone to the
23 bathroom sometime between 9:30 and 10:00, that he's kind
24 of aware of their day-to-day habits. And then after a
25 while, he noticed that he hadn't returned. He was aware

1 that Steven had a case management conference, I believe
2 it's called. He wasn't sure if he had gone to the
3 courtroom, but he just didn't see him around the office.
4 He sent him a text message. He got no reply. He
5 checked his office and found his keys, wallet, and phone
6 on his desk.

7 Q. Okay. And Jake Blanchard, when you initially
8 spoke with him in the early afternoon -- it was the
9 early afternoon on March 21st, or midafternoon?

10 A. Correct.

11 Q. Okay. Did he mention any problems or issues
12 with Tomasz Kosowski?

13 A. At some point. And I don't remember. We were
14 back and forth a lot. I believe that came up, and he
15 informed us of that, but I don't remember if that was my
16 initial conversation with him.

17 Q. Okay. Do you recall specifically him
18 discussing with you or describing a deposition that had
19 occurred on January 26th, 2023, had become contentious?

20 A. He did.

21 Q. Okay. Do you recall the details of this
22 conversation?

23 A. Yeah. He told us that he wasn't part of the
24 deposition, he wasn't in the deposition, just that he
25 had gotten emails from Steven about it, and that Steven

1 had later told him that he was confronted in the
2 bathroom by Kosowski.

3 Q. Okay. Do you know whether or not the emails
4 that he had received was during or after the deposition?

5 A. I don't know.

6 Q. Do you recall when Mr. Blanchard told you about
7 Steven Cozzi being confronted by Kosowski in the
8 bathroom?

9 A. I believe that was while we were at the office
10 with him, but at what point in the day, I don't -- I
11 don't recall.

12 Q. Okay. Would it -- in reviewing your initial
13 report, would that information be in your report?

14 A. I'm looking at it where I note it, and it's
15 just during a conversation. It's just during our
16 conversation with Blanchard after viewing those initial
17 portions of surveillance footage.

18 Q. I'm looking on page 192, and it says,
19 "Blanchard informed me of a deposition that occurred in
20 their office conference room on January 26th, 2023, in
21 which Kosowski had been present. He had been in the
22 room but recall it being -- he had not been in the room
23 but recalls it being contentious. He also recalled
24 Cozzi informing him that after the deposition, Kosowski
25 had cornered Cozzi in the men's restroom and verbally

1 confronted him. Blanchard had not been present for this
2 confrontation."

3 So it was at some point that day, but you don't
4 know when? It was later in the day or...

5 A. Yeah, it was at some point. And I believe I
6 only spoke with Blanchard at length the one time. So I
7 believe it would have been some point during that
8 conversation, but I couldn't say for sure.

9 Q. Do you recall whether or not another officer
10 with a body cam recording device was present for that
11 conversation?

12 A. I believe so, but, again, I don't recall.

13 Q. Okay. Did Mr. Blanchard indicate to you that
14 he wanted to wring Kosowski's neck or otherwise
15 physically harm Dr. Kosowski as a result of the
16 interaction on January 26th, 2023?

17 A. I don't recall that statement.

18 Q. Okay. Do you recall Mr. Blanchard indicating
19 or saying anything about wanting to burst into the
20 deposition to confront Dr. Kosowski as a result of
21 Dr. Kosowski allegedly calling Steven Cozzi a scumbag?

22 A. Not the specifics. I recall him being upset
23 about it.

24 Q. Okay. But not those type of specific
25 statements?

1 A. I don't recall what specifically he said about
2 it.

3 Q. I mean, if there was a reference to him calling
4 him a scumbag, would you most likely have included that
5 in your report?

6 A. If I had recalled it. By the time I wrote the
7 reports there was a lot of information to sort through.

8 Q. Sure.

9 But would you agree that someone who is a
10 potential suspect in the disappearance or the murder of
11 someone and you have information that that person
12 earlier, even if it's months earlier, had called that
13 person a scumbag, that's probably something you would
14 include?

15 A. Are you referring to Blanchard's statements or
16 Kosowski's?

17 Q. No, Blanchard. Blanchard.

18 If Blanchard said that to you, you would
19 probably include it?

20 A. Most likely.

21 Q. Okay. At what point does Dr. Kosowski become a
22 person of interest in this case?

23 A. When we followed the truck to his house and
24 it's a doorway.

25 Q. Okay. The -- who had first mentioned

1 Dr. Kosowski by name?

2 A. That, I believe it was Blanchard.

3 Q. Okay. Did you review Detective Hunt's
4 interview of Celeste Bacher, I think it is, or Bacher,
5 the real estate agent with Ronati?

6 A. I think he informed me of the interview.

7 Q. Okay.

8 A. I don't specifically recall it.

9 Q. Okay. Do you recall her indicating that an
10 unknown male in his thirties with brown hair, medium
11 build, and a goatee, had been seen near the bathroom
12 around the time of Cozzi disappeared?

13 A. No, I don't recall that.

14 Q. Do you recall her making a statement about
15 someone fitting that description being seen there at the
16 week prior in the vicinity of the bathroom and the
17 utility closet?

18 A. Celeste Bacher making that statement?

19 Q. Yes, Celeste Bacher, B-a-c-h-e-r.

20 A. I don't recall her making that statement.

21 Q. I'm looking at Detective Hunt's, one of his
22 reports. I don't know what it is in the new printout,
23 but in the old it's the -- it's the March 21st, 2023
24 report, page -- the third page of the report.

25 A. Okay. I see that.

1 Q. Okay. Do you recall that now?

2 A. I don't. I don't recall discussing that with
3 Celeste or talking with Celeste.

4 Q. What about talking to Detective Hunt about it?

5 A. No, I don't recall talking to Detective Hunt
6 about that.

7 Q. Okay. And what about in reviewing all the
8 reports? Do you recall reading that?

9 A. No, I don't.

10 Q. It said, "Bacher explained that today she was a
11 bit frazzled over the previous incident, and while
12 walking in the utility closet passed a white male she
13 had never seen before. The male was described as being
14 in his thirties with brown hair, a medium build, and a
15 short goatee. She described he was wearing a light
16 brown Jack Hannah safari style shirt. Bacher had
17 commented to us she has never seen the man before. She
18 believes he may have worked for the veterinary office."

19 Did you ever try to locate this individual on
20 any of the surveillance video?

21 A. The individual in the white shirt?

22 Q. Right, the one that's described by Bacher that
23 I just gave.

24 A. So in watching the video footage, I mean, this
25 is down the road, we see that an individual of that

1 description comes in from that vehicle, from that dark
2 pickup truck in the parking lot. That individual enters
3 the building. Nobody else comes or goes to the vehicle
4 until the individual in the T-shirt with the wagon
5 returns to that vehicle.

6 Q. Okay. Is it your belief that that person is
7 the same person?

8 A. It is.

9 Q. Okay. And as far as the goatee?

10 A. I couldn't speak to the goatee.

11 Q. Is it your position that the person that comes
12 in and is wearing a mask might have had a goatee, real
13 or fake?

14 A. I couldn't say for sure.

15 Q. Okay. All right. You indicate that you didn't
16 see anyone come back out the doors, and that's the
17 reason why, or one of the reasons why you believe it's
18 the same person; right?

19 A. Correct.

20 Q. Okay. There are other doors where someone
21 could exit the building; right?

22 A. There are.

23 Q. Okay. On the side facing Belcher, how many
24 doors are there on that side that are easily accessible
25 to access the building?

1 A. I believe there's two.

2 Q. Okay. What about on the side facing south?

3 A. I don't know. There's at least one that I
4 recall.

5 Q. Okay. And then one facing east?

6 A. I don't know.

7 Q. Okay. You don't recall?

8 A. No.

9 Q. Okay. Was there also an area in the utility
10 closet where someone could exit through the roof?

11 A. There is.

12 Q. Okay. And you indicated that you did not speak
13 with Ms. Bacher?

14 A. I did not.

15 Q. Any particular reason why you did not?

16 A. No.

17 Q. And I understand that basically no additional
18 efforts were made to identify the person because the
19 belief was that it was the same person that's seen
20 entering the -- entering and exiting the office
21 building --

22 A. Correct.

23 Q. -- with the wagon and the mask?

24 A. Correct.

25 Q. Do you recall Ms. Bacher being shown a photo

1 pack that included a photograph of Dr. Kosowski?

2 A. I know there was at least a witness shown a
3 photo pack. I don't recall who it was.

4 Q. Do you recall that that witness was not able to
5 identify Dr. Kosowski?

6 A. Correct.

7 Q. Do you recall the description that
8 Mrs. Heinrich gave of your unknown male that was seen on
9 March 14th, 2023, near the utility closet?

10 A. I recall her giving a description, but I'll
11 have to refer to my report --

12 Q. Sure.

13 A. -- for the exact description.

14 Q. Okay.

15 A. Referring to the incident on March 14th, 2023?

16 Q. Yes, the --

17 A. The description Ms. Heinrichs provided?

18 Q. Yes?

19 A. She described him as wearing jeans, a
20 loose-fitting T-shirt, a paper surgical mask.

21 Q. Okay. Anything else?

22 A. Just that it was a male approximately six feet
23 tall.

24 Q. Okay. And does that appear to also be
25 consistent with the person that Mrs. Bacher described?

1 A. From what I'm reading, I mean, there's
2 different details, but it appears consistent.

3 Q. Okay. Different details as far as the goatee?

4 A. The goatee, correct.

5 Q. Okay.

6 A. She's a little more -- I mean, from what I'm
7 reading from Detective Hunt's supplement, she seems a
8 little more saying -- in saying he was in his --
9 possibly in his thirties, light brown hair, yeah.

10 Q. Okay. But that's not necessarily inconsistent
11 with the person on the 14th?

12 A. Correct.

13 Q. It's just less details about the person on the
14 14th?

15 A. Correct.

16 Q. Okay. Did you, or who interviewed Ms. Heinrich
17 first? Do you recall?

18 A. Detective Allred, I believe.

19 Q. Okay. And what did Mrs. Heinrich have to say
20 when she was first interviewed?

21 A. So I only have a brief summary --

22 Q. Okay.

23 A. -- of their interview.

24 Q. Right.

25 A. But the information I got was that she -- from

1 the 14th, she recalled encountering that individual in
2 the electrical closet.

3 Q. Okay.

4 A. That person telling her that there was a power
5 outage and leaving immediately. She followed that
6 person into the parking lot, saw them get into what she
7 believed was a Toyota Tundra with a yellow license
8 plate. She was specific in that it wasn't like a county
9 or city tag or a state license plate. Sorry. Rather a
10 state government plate. She was specific in saying it
11 was a yellow license plate, possibly New Jersey. So she
12 was differentiating between, like, a personal tag and a
13 state or government employee license plate, I think.

14 Q. Okay. And when is that information provided by
15 Ms. Heinrich?

16 A. I believe that's while we're all on scene --

17 Q. Okay.

18 A. -- at Blanchard's office.

19 Q. On March 21st?

20 A. Correct.

21 Q. What else does Ms. Heinrich say that you know
22 of, that you were informed about?

23 A. That there was a cardboard box that had been
24 left on the floor in the electrical closet.

25 Q. Okay.

1 A. She went back, or they found a cardboard box.
2 They couldn't -- she and the other employees there
3 couldn't find an owner or know what it was. There was
4 another employee that had opened the box, and Heinrich
5 said that -- or Heinrich said she observed what appeared
6 to be some kind of collapsible cart.

7 Q. Okay. Anything else?

8 A. No, not that -- and it looks like she relayed
9 to Detective Allred. She relayed the information to
10 another employee who summarized her statement in an
11 email, but --

12 Q. Who was that?

13 A. -- she reported that to Christina Greene.

14 Q. Okay. On March 21st or a different date?

15 A. On the 14th.

16 Q. On the 14th. Okay. All right.

17 I don't believe Ms. Heinrich was ever shown a
18 photo pack.

19 A. I don't know. I don't believe so.

20 Q. Okay. Well, you don't believe so or you know
21 that she was not?

22 A. I don't believe so. I recall discussing the
23 individual was wearing a mask. She reported the person
24 wearing a mask the whole time, so a photo pack wasn't
25 shown.

1 Q. Okay. And the reason for not showing a photo
2 pack was because most of the face was covered by a mask?

3 A. Correct.

4 Q. And was there also some sort of a hat, or no?

5 A. I don't have any details --

6 Q. Okay.

7 A. -- about that individual wearing a hat.

8 Q. Okay. What about glasses?

9 A. I don't have any reference to that in my
10 report.

11 Q. Okay. Any description of the hair?

12 A. No. I didn't speak to her directly about it.

13 Q. Okay. So in your summary, no description of
14 the hair?

15 A. No, not in my summary.

16 Q. But your belief is that because of the mask and
17 then it was unlikely that Ms. Heinrich would be able to
18 identify the person that she saw?

19 A. Correct.

20 Q. Are you -- do you understand that Debra
21 Heinrich at some points -- at some point identifies
22 Kosowski as the person she saw at 1501 Belcher on
23 March 14th, 2023?

24 A. That she positively identified him?

25 Q. Positively identified him.

1 A. I'm not.

2 Q. Okay. If she had positively identified him to
3 law enforcement, would that be a fairly significant
4 thing?

5 A. It would.

6 Q. Okay. And would there be a report detailing
7 that?

8 A. I would imagine so.

9 Q. Okay. As far as you know, being familiar with
10 this case and being the lead detective, was there ever a
11 time when Ms. Heinrich came to you or anyone working
12 with you identifying Kosowski as the person she saw in
13 the building on March 14th, 2023?

14 A. As far as I know, no.

15 Q. All right. So would it be fair to say that if,
16 in fact, she brought that information to somebody, it
17 likely was not anyone with Largo Police Department,
18 associated with this case at least?

19 A. Yeah, that would be safe to say.

20 Q. Okay. Did you, yourself, view the video
21 surveillance for 1501-B Belcher as it relates to the
22 door on the north side of the building?

23 A. I did.

24 Q. Okay. And could you tell us how many males --
25 unknown males entered that door between 8:30 and noon?

1 A. I could go through and count.

2 Q. Sure.

3 A. But I think I individually noted every one of
4 them. A male at 8:34. Steven Cozzi. Looks like two at
5 9:07, one at 9:10, one at 9:14, one at 9:51. I'm sorry.
6 That one at 9:51 is a delivery driver who is not seen
7 actually entering either building.

8 Q. What's he seen doing? Just walking up to the
9 door?

10 A. I believe so. He walks north out of the
11 parking lot from the truck, mostly concealed by shrubs
12 along the west side of the building. Did not see him
13 actually entering either building, but the door of the
14 north building can't be seen from that camera. I know
15 that. But he doesn't enter B.

16 Q. Okay. So he may be going into the building
17 across from B?

18 A. Yeah, correct, to building A.

19 Q. All right.

20 A. And then I have the male leaving at 10:22. So
21 it looks like one, two, three, four, five or six, but
22 I'd have to watch the footage again to know if any of
23 those are different individuals, and, you know, if
24 there's more people crossing the area between the two
25 buildings.

1 Q. Okay. Is there -- do you know the number of
2 people that left the building -- unknown people that
3 left the building?

4 A. I don't. Again, I'd have to watch it and add
5 them up.

6 Q. Okay. Do you know if you observed any crates
7 or wagons enter the building between the same period,
8 8:30 a.m. and noon?

9 A. I believe there were dog crates.

10 Q. Okay.

11 A. I don't recall how many, but I remember people
12 carrying them were able to carry them with one hand.

13 Q. Okay. What about wagons?

14 A. No wagons.

15 Q. Okay. Of the five or six unknown males that
16 entered the building, by males, do you know if they're
17 males or...

18 A. I think there were one on two I just described
19 as a person because I couldn't tell.

20 Q. Okay.

21 A. But the other ones, if I could tell it was a
22 male --

23 Q. Okay. Did any of them have a goatee?

24 A. I don't recall.

25 Q. How about, did you see any individuals with

1 large boxes enter between 8:30 and noon?

2 A. Well, one male at 8:34. One male at 9:07
3 carrying an unknown item under his arm. One woman at
4 9:39 carrying a black animal crate, but she entered
5 Building A, but no, nothing else about large boxes.

6 Q. Okay. And did you keep track of those same
7 people leaving the building as well?

8 A. I watched -- I watched that time period between
9 that 8:30 to about until the Tundra leaves. So those
10 comings and goings. Specifically, I don't know who they
11 are, exactly where they went.

12 Q. Okay. You had indicated that Kosowski became a
13 person of interest after you had placed the Tundra to
14 Tarpon Springs.

15 Can you elaborate on that?

16 A. So the only -- the only real anomaly, you know,
17 after we kind of gone through all the steps of
18 investigating a missing person, the only thing that left
19 through the building that we could see that looked like
20 it had the potential to be a person and when we saw the
21 blood looked to be that wagon. That appears to go into
22 the truck. So the next step was to follow the truck as
23 far as we possibly could, but then we were able to
24 follow that to Kosowski's residence.

25 Q. Was Kosowski's residence a targeted residence

1 before you started following the truck via video
2 surveillance?

3 A. No. I mean, until it started heading in that
4 direction, we were aware of -- we were aware of who he
5 was. I think maybe aware of his address, but we had --
6 in researching him, we didn't see that he -- we didn't
7 see immediately that he owned a Toyota Tundra or a
8 Toyota pickup truck.

9 Q. Okay. So what time do you arrive at the
10 conclusion that the video surveillance has tracked this
11 truck to the home of Tom Kosowski?

12 A. We made contact with the neighbor at
13 503 Seaview Drive on March 23rd.

14 Q. Okay.

15 A. And I don't recall exactly what time we got
16 there.

17 Q. Is 503 to the south of Tom Kosowski's home?

18 A. Yes.

19 Q. Same side of the street or opposite side?

20 A. Same side.

21 Q. Okay. Is it immediately next to 511 Seaview or
22 was it further back?

23 A. Yes. No, it was immediately next to.

24 Q. Okay. I believe that you were able to
25 establish the time that Steven Cozzi left his home the

1 morning of March 21st, 2023?

2 A. Yes.

3 Q. And was that at 8:09 a.m.?

4 A. Let me check.

5 Yeah. Michael Montgomery was able to confirm
6 that Steven Cozzi had left their residence at 8:09 a.m.
7 that day.

8 Q. And do you know how he came up with that time?

9 A. He checked their -- they have a Ring doorbell
10 camera. He was able to see the recorded event.

11 Q. Okay. And did anyone check to see whether or
12 not the Ring doorbell camera was, in fact, on an
13 accurate time schedule?

14 A. I don't recall doing so.

15 Q. Okay. And you don't know if anyone else did?

16 A. No, I don't.

17 Q. Okay. But assuming that's accurate, that would
18 have been the time that he left the house?

19 A. Correct.

20 Q. And did you also determine that he arrived at
21 work around 8:37 a.m.?

22 A. Yes.

23 Q. The distance between where he lived and worked
24 was about ten minutes.

25 Did you trace his whereabouts between 8:09 a.m.

1 and 8:37 a.m. It's almost 30 minutes.

2 A. No, we didn't trace his.

3 Q. No?

4 A. No.

5 Q. You interviewed Michael Montgomery?

6 A. I did.

7 Q. Did he indicate to you that prior to your
8 arrival that he had met with Jake Blanchard on
9 March 21st, 2023?

10 A. He did.

11 Q. Okay. Did he indicate that they had discussed
12 Dr. Kosowski?

13 A. Not -- not specifically, just that he had come
14 to the -- he had come to -- he had come to their office.

15 Q. Okay. Well, did -- was there a discussion
16 about the doctor that had caused some concerns?

17 A. I don't know. I don't know if they had a
18 conversation between themselves or about that.

19 Q. Give me a second.

20 A. Sure.

21 Q. Let me see.

22 I'm looking at page -- the bottom of page 198
23 and top of page 199 of your report on today's page
24 numbers.

25 A. Okay. Yep, I see it.

1 Q. Does it appear that he had discussed with
2 Mr. Blanchard the doctor and the concerns about the
3 doctor?

4 A. If -- are you saying if Montgomery and Cozzi
5 had discussed the doctor?

6 Q. That's correct. I'm sorry. I'm sorry.
7 No, that Montgomery and Blanchard, would that
8 morning -- so if you look at the top of page 1.

9 A. I see it. Top of page 199. Yeah, so they did;
10 right?

11 Q. Yeah, the top of page 199.

12 A. Yeah. And Montgomery states that was the first
13 thing. Montgomery was asked if Cozzi had reported the
14 incident referring to being confronted after the
15 deposition to anyone.

16 Montgomery stated that he had only documented
17 it in an email. And then Montgomery made the statement,
18 "That was the first thing that came to mind when I got
19 here, and I asked Jake about it, but he said he wasn't
20 worried about that."

21 Q. Right. Okay.

22 So they discussed it, and Mr. Blanchard said to
23 Montgomery that he wasn't worried about that involving
24 Dr. Kosowski; right?

25 A. Correct.

1 Q. Okay. So at that point Montgomery is talking
2 to Mr. Blanchard, based on that statement, it appears
3 that Mr. Blanchard at that point was not worried or
4 concerned about Kosowski causing any harm to Steven
5 Cozzi. Would that be fair?

6 A. Yes.

7 Q. Okay. Did you obtain information from Steven
8 Cozzi's family about him suffering from anxiety and also
9 having a history of alcoholism?

10 A. Montgomery had told me about that.

11 Q. Okay. And what, if anything, did you do to
12 follow up on that information?

13 A. Montgomery had told us that Cozzi was
14 prescribed a low dose of Prozac, and that he had been
15 attending AA meetings but had been sober for
16 approximately ten years.

17 Q. Okay. Was there a concern, based on that
18 information, that maybe he had fallen off the wagon?

19 A. I asked about it. I mean, at that point it was
20 still a missing person's investigation.

21 Q. Sure.

22 A. And I asked about it, but Montgomery had said
23 he didn't believe that -- he didn't believe that he had
24 seen anything that indicated it.

25 Q. Okay. But did other officers with your

1 department check at local bars in the area to make sure?

2 A. They did.

3 Q. Okay.

4 A. They did. I think some patrol had checked
5 prior to our arrival as well.

6 Q. Okay. So it was an issue that was investigated
7 and followed up on?

8 A. You can say that.

9 Q. The concern basically, regardless of
10 Montgomery's beliefs that the possibility that someone
11 may have fallen off the wagon and left and went
12 drinking, and that's where the person is missing was one
13 of the issues that was a legitimate issue to explore?

14 A. Correct. Correct.

15 Q. As far as the anxiety, was the anxiety of such
16 a nature that there was a concern about potential
17 suicide?

18 A. No. Montgomery said that that was never a
19 concern of his. He didn't believe -- he didn't believe
20 that he'd seen any indication from Cozzi that was in his
21 nature or something that he contemplated.

22 Q. Okay. Did you obtain any information in
23 investigating the case that included Steven Cozzi having
24 any type of history of being involved in violent
25 interactions with other former roommates or boyfriends?

1 A. Not specifically. I know Montgomery was aware
2 of a prior boyfriend.

3 Q. Okay. Do you know how many incidents that
4 may -- that were reported, whether it was the
5 information reported by Montgomery?

6 A. He was just aware of a boyfriend. I don't know
7 if there was -- I'm not aware of anything violent in
8 anybody's previous history.

9 Q. Did you run a -- did you search to see if there
10 was any type of arrest history for Mr. Cozzi?

11 A. Not that I recall, no.

12 Q. Do you understand that one of the reasons
13 Mr. Cozzi moved from New York City to live with his
14 parents was because of some sort of a violent
15 interaction in New York City?

16 A. I was not aware of that.

17 Q. Did you at some point obtain a mugshot of
18 Steven Cozzi?

19 A. I don't recall doing so.

20 Q. Anyone with your department?

21 A. Not that I know of.

22 Q. What do you know about the whereabouts of Jake
23 Pillsbury the morning and earlier afternoon of
24 March 21st, 2023?

25 A. I don't know what his whereabouts were.

1 Q. Was Jake Pillsbury ever a person of interest?

2 A. No.

3 Q. Why not?

4 A. There was no report of contention. There was
5 no evidence that led us in to him or in his direction.

6 Q. Okay. What about same question for Michael
7 Montgomery? Was he ever a person of interest?

8 A. After our -- after our interviews with him, no.
9 There was nothing that raised any alarms or any
10 suspicions about the incident with him.

11 Q. So might he have been a person of interest, but
12 never a suspect? Would that be your assessment?

13 A. Yeah. A significant other in a missing persons
14 case, he's a person of interest. He was absolutely one
15 of the first people we wanted to talk to and get as much
16 information as we could from him, but, yeah, there was
17 no information he provided or that we could find that
18 led us to think he had anything to do with Cozzi's
19 disappearance.

20 Q. So he was a person of interest because of his
21 relationship.

22 Was he ever a suspect?

23 A. No.

24 Q. What about Jake Blanchard? Was he ever -- was
25 he a person of interest?

1 A. A person of interest as in he had crucial
2 information, sure.

3 Q. Okay. Was he ever a suspect?

4 A. No.

5 Q. And why not?

6 A. There was nothing that we could find or nothing
7 that we saw that led us to believe that there was any
8 kind of violent incident between them or that Blanchard
9 had anything to do with Cozzi's disappearance.

10 Q. Based on your investigation, do you have an
11 opinion as to what happened or didn't happen at
12 1501 Belcher in the morning of March 21st, 2023?

13 A. An opinion?

14 Q. Yeah, based on your investigation.

15 A. The only thing I could say is that there was a
16 significant bloodletting event in the bathroom.

17 Q. Okay.

18 A. As far as -- do you have another way to ask
19 that, or...

20 Q. Well, based on the significant bloodletting
21 event in the bathroom, do you, based on your background
22 and experience and the investigation that you did, what,
23 if anything, can you conclude from that, if anything?

24 A. I believe that Cozzi is dead as a result of the
25 significant bloodletting event in the bathroom.

1 Q. Okay. Anything else you can say about how it
2 may have happened?

3 A. As to how it may have happened, no, I couldn't.

4 Q. Okay. And is that the basis for why you
5 believe that Steven Cozzi is deceased?

6 A. And that -- yes, essentially.

7 Q. Okay. And you said "and." And what?

8 A. Yeah. There's numerous, numerous things that
9 can cause a bloodletting event like that. So it's -- to
10 whittle it down to anything in particular.

11 Q. Okay. I mean, when you say numerous events,
12 would that include suicide?

13 A. A suicide -- if it were a suicide, I would
14 expect that we'd have found him there.

15 Q. Okay. But would that be one of the many events
16 that could cause it?

17 A. Not with the circumstances that we found.

18 Q. Because the body was not there?

19 A. Because I -- yeah. I would imagine we'd have
20 found him leaving or, I mean, a significant bloodletting
21 event like that, I don't imagine he'd be able to drive
22 himself.

23 Q. Sure.

24 But the cause of him dying as a result of
25 significant blood loss, that in and of itself, you had

1 indicated could be caused by many different ways.

2 And would it be fair to say that one of those
3 ways would be someone slitting his wrists or his throat
4 or what have you, doing it himself as a suicide?

5 A. That can lead -- that could be a significant
6 bloodletting event.

7 Q. Sure.

8 A. But the rest of the circumstances don't
9 indicate that.

10 Q. Sure. Sure.

11 Primarily because the body -- there's no body
12 there; right?

13 A. Correct.

14 Q. And there appears to be some clean-up?

15 A. Correct.

16 Q. Is it your understanding that -- well, let --
17 what is it that -- you know, we start out with the idea
18 that you don't see a lot of blood; right? You see a few
19 blood drops.

20 How do we get from that to a significant
21 bloodletting event?

22 A. So I took another look at the bathroom just
23 standing in the doorway, and I can see that there was a
24 discoloration of the floor. The floor is a dark color,
25 a very dark color, small tile, small pattern tiles.

1 Q. Okay.

2 A. And in looking at it closer or looking at it
3 just longer, I could see that, you know, it appeared
4 that there was some clean-up. So at a first glance,
5 what I saw was what contrasted with the dark-color
6 liquid against lighter-color walls and stall walls. And
7 then at a second glance, taking more time to look at it,
8 then it became obvious there was -- it looked like a
9 dark-colored liquid on a dark-colored floor. And that
10 was more evident the second time I looked at it.

11 Q. Okay. But would you agree that that in and of
12 itself, it just -- it appears that there could have been
13 blood left there; right? You have to do additional
14 testing?

15 A. Correct.

16 Q. Okay. And what's the additional testing that
17 results in your conclusion that there was significant
18 bloodletting?

19 A. All right. So PCSO forensics was requested and
20 responded.

21 Q. Right.

22 A. They used a blood reagent to take -- it's
23 called luminol. They used a blood reagent to take
24 photographs. And that reagent reacts. The photographs
25 they take will show the extent of the reaction.

1 Q. Okay.

2 A. And from that, that kind of shows the areas of
3 where that liquid had pooled and then wiped, and it
4 showed, you know, the various patterns that it left
5 behind.

6 Q. Okay.

7 A. And, of course, you had blood on the toilet,
8 underneath the toilet and on top of.

9 Q. And all this is, you're primarily seeing it
10 because of the luminol?

11 A. Correct.

12 Q. So would you say that's a significant factor in
13 your conclusion that this was a significant bloodletting
14 event?

15 A. Correct.

16 Q. Okay. Are you also aware that many different
17 substances or -- including cleaning solutions, that can
18 cause the same reaction using luminol?

19 A. I'm aware of some. I don't know the extent of
20 that.

21 Q. Sure.

22 And presumably you would leave that to the
23 experts?

24 A. Correct.

25 Q. Okay.

1 A. And we also had some of the -- some of the
2 areas of what the luminol reacted to tested that was
3 shown to be blood.

4 Q. Sure. Sure.

5 But as far as quantifying some of the areas
6 that turn out to be blood, I'm assuming you're not in a
7 position to quantify that?

8 A. No, I couldn't quantify that.

9 Q. Okay. So it's not the spots that would turn
10 out to be blood that causes you to say a big
11 bloodletting, it's what you see with the luminol images?

12 A. Well, it's the totality of what I saw, yeah.

13 Q. Sure.

14 But the big or the quantity comes from that,
15 not from the fact that a few spots were tested and
16 turned out to be blood?

17 A. Correct.

18 Q. Okay. Would it be fair to say that, you know,
19 one of the things that you considered when you were
20 there doing the missing person investigation is
21 considering the fact that there was a possibility that
22 Steven Cozzi could have just walked away; right?

23 A. Yes.

24 Q. Okay. And that could have included going out
25 the door that he comes in on the north side of the

1 building; yes?

2 A. Yes.

3 Q. But it also could have included several other
4 exit points in the building, including going through the
5 roof?

6 A. It could have.

7 Q. What, if any, investigation did you do to
8 follow up on the information that was provided about
9 homeless people being around the building, and then
10 concerns about the number of homeless people that hung
11 out near or around the building?

12 A. We checked -- we checked the interior of the
13 building. No signs of anybody, like, surreptitiously
14 living in the building or spending any amount of time
15 there. They were just vacant offices that didn't have
16 any -- any personal property consistent with that.

17 As far as looking into other homeless people in
18 the area, there was -- nothing was reported to us beyond
19 that that might have happened.

20 Q. Okay. Did you have anyone from patrol go out
21 and sort of check on, you know, whether or not there
22 were homeless people seen in the following days
23 surrounding the building or in the proximity of the
24 building?

25 A. I personally did not, no.

1 Q. You personally did not, but did you ask anyone
2 from patrol to, hey, you know, keep an extra eye out on
3 this particular building and the surroundings to see,
4 you know, what the situation is after hours?

5 A. I don't recall asking anyone specifically to do
6 that, no.

7 Q. Okay. Any particular reason why not?

8 A. No, it didn't -- it didn't come to mind.

9 Q. Do you know whether or not there was a
10 trespasser on the property on March 19th? You know, on
11 the property or the parking lot that was reported by the
12 staff of the veterinary business?

13 A. No, I'm not aware of that.

14 Q. That would be Largo jurisdiction?

15 A. It would.

16 Q. Okay. Would you be able to check to see if
17 there were any reports or any calls?

18 A. I would.

19 Q. Is that something you could do now, or...

20 A. Should be able to pull it up.

21 Q. Okay.

22 A. Do you know if that was called to Building A or
23 Building B?

24 Q. I believe B, but I'm interested in A or B. I
25 believe there was something on the 19th and on the 20th

1 of March, 2023. There's a couple that's reported seeing
2 loitering around the building on March -- Monday,
3 March 20th, and then a trespasser on March 19th, may
4 have been in the parking lot, but they may have been
5 both in the parking lot, but I would be interested in
6 either.

7 It would be 1501 South Belcher Road. I don't
8 know if it would come up with the B or the A or not?

9 A. So I checked by 1501, 1501-A, and 1501-B South
10 Belcher Road, but I don't see it.

11 Q. You don't see it?

12 A. No.

13 Q. Maybe that's the report -- you're looking at
14 the whole report database for Largo?

15 A. Correct, by location.

16 Q. Okay. Could it be in there in a different way?

17 A. It's possible.

18 Q. Could it be by the business name?

19 A. That might capture only unit number by business
20 name.

21 Q. Can you run that as well just to check?

22 A. Let's see.

23 Q. That would be by the vet business, not by
24 the -- not by the law office.

25 A. By the veterinary business?

1 Q. Right.

2 Tampa Bay Veterinary, is it services?

3 A. Yeah. I don't see it. Just February 11th,
4 March 14th, and March 21st.

5 Q. Okay. And I can't remember if I asked you
6 this, but were you able to determine the color of the
7 shirt of the individual that was seen exiting the lobby
8 around 10:22 a.m.?

9 A. It appeared to be a light blue with contrast.
10 On the surveillance footage, I know that can be gray
11 or...

12 Q. And would that be consistent with the color of
13 the shirt that Steven Cozzi was wearing?

14 A. I'd have to look at the footage again, but it
15 was reported to me that he was wearing a polo shirt.

16 Q. But blue?

17 A. Correct.

18 Q. Because the color blue would be consistent?

19 A. I don't know if it was a dark blue or a light
20 blue. What I saw the individual wearing was a light
21 blue that could appear to be gray.

22 Q. Okay. Can you look and see what was reported
23 to you as far as the color was concerned, if it was more
24 specific than just blue?

25 A. Sure.

1 Q. And also whether or not it was a polo shirt or
2 reported just as a blue shirt?

3 A. Yeah.

4 MR. BRUNVAND: While you're looking for that,
5 is everyone okay with, maybe in a half hour, taking
6 a half hour lunch from 12:45 to 1:15?

7 MR. VONDERHEIDE: I'm okay with whatever you
8 guys want to.

9 THE WITNESS: That will work.

10 I don't see anything that's any more
11 descriptive of it.

12 BY MR. BRUNVAND:

13 Q. Other than just blue?

14 A. Other than just blue.

15 Q. Does it say if it's a polo or a T-shirt?

16 A. I recall Montgomery describing it as a polo
17 shirt.

18 Q. Do you see that in your report?

19 A. No, I don't. I'm looking for it.

20 So Montgomery didn't recall exactly what the
21 shirt was. Only from Blanchard -- he'd only got from
22 Blanchard that it was a blue polo shirt.

23 Q. Okay. So Blanchard had indicated to you or
24 Montgomery that he thought it was --

25 A. Montgomery. Blanchard had indicated to

1 Montgomery.

2 Q. Okay. Very good.

3 On page 201 of the reports that we've been
4 looking at today, towards the bottom, the second
5 paragraph from the bottom, you indicate -- I believe
6 this is you. It says, "I told Montgomery there is an
7 issue with transients in the general area, and that I
8 believe there was a recent call involving an unknown
9 person in the building, and asked if Cozzi ever
10 mentioned an issue like that."

11 You see that?

12 A. Yes.

13 Q. Okay. So it appears -- is that you talking to
14 Montgomery?

15 A. That is.

16 Q. Okay. So it appears that you were aware at
17 that point about an issue with transients in the general
18 area and about a recent call involving an unknown person
19 in the building?

20 A. Yeah, at that point I was.

21 Q. Okay. And this is on March 21st; right?

22 A. Correct.

23 Q. And he responded that he had also been told by
24 an unknown person about a homeless person that had been
25 living in the building?

1 A. Yeah, that's what he stated to me.

2 Q. Okay. Okay. Did you do any further
3 investigation on that information?

4 A. So in my experience working patrol for so many
5 years, the homeless camps are pretty easy to find and
6 they're pretty distinct. In going through the entire
7 building, we didn't find anything indicative of somebody
8 living in the building.

9 Q. Okay. Right.

10 You indicated that, but the idea of problems
11 with transients in that area and homeless people, did
12 you, beyond -- beyond looking and seeing there's nothing
13 suggested to you that anyone is living there, did you do
14 anything beyond that?

15 A. No.

16 Q. Was there a belief at one point that the person
17 who was wearing the blue shirt leaving the building at
18 10:22 a.m. seen on the surveillance video was, in fact,
19 Steven Cozzi?

20 A. Initially that's what the belief was.

21 Q. Okay. And you had that -- you held that belief
22 initially?

23 A. I didn't -- I didn't know. At my first review
24 of the footage, that's what I was told being shown those
25 two portions of footage.

1 Q. Okay.

2 A. And I didn't have a belief one way or the
3 other.

4 Q. Okay. Other than, I mean, you did have the
5 information about the blue shirt and you're seeing
6 someone leaving with a blue shirt?

7 A. Correct.

8 Q. Okay. There was -- it seemed to me that there
9 was a time period when the belief was that Steven
10 Cozzi -- where Blanchard and maybe some other people in
11 his office were asking if they could view the
12 surveillance video, and they were told they couldn't
13 view it yet.

14 A. Yeah, I believe that's correct.

15 Q. What was the reason for that?

16 A. I don't know. I believe Officer Bure was --
17 had reviewed it and didn't want them reviewing it.

18 Q. Okay. Okay.

19 A. I don't know what her reason was.

20 Q. Okay. Were there -- there's -- there are logs
21 of door opening and closing events of Steven Cozzi's
22 office that was, I believe, provided by Ironshield
23 Security?

24 A. Correct.

25 Q. And so the first time I believe of logs

1 entering or exiting the office is 9:12:02 a.m. Is that
2 accurate?

3 A. Give me one second to look at it.

4 Can you repeat that?

5 Q. 9:12:02 a.m.

6 A. 9:12. On the 21st?

7 Q. Yes.

8 A. Are you looking for the first activation of
9 that on the 21st, that particular door on the first?

10 Q. Yes.

11 A. So looking at it, front door, back door open
12 and close 8:53:32 a.m.

13 Q. Okay. When is the next time?

14 A. 8:56:34.

15 Q. Okay. And what's the next one?

16 A. The next one is 9:08:57.

17 Q. And then after that?

18 A. 9:12:02.

19 Q. And is that -- which door is this? Is this the
20 one that takes him to the hallway where the bathroom is?

21 A. Correct.

22 Q. What's the next one after the 9:12:02?

23 A. 9:50:36.

24 Q. And all these are times that door was opened,
25 which might indicate that Steven Cozzi or someone either

1 exited or entered the office. That door opening and
2 closing; correct?

3 A. Right.

4 Q. Right. Okay.

5 Do you have any way of knowing, for example,
6 where Steven Cozzi was between 9:12:02 and 9:50:36 a.m.?

7 A. I don't.

8 Q. And what about prior to the 9:12:02? Do you
9 have any knowledge as to where he would have been during
10 that time?

11 A. I don't.

12 Q. And from 9:50:36 to 11:33:17?

13 A. I believe that was when Jake Blanchard said he
14 went through Steven Cozzi's office while he was looking
15 for him.

16 Q. Okay. What is it that caused you or whoever
17 decided that the person seen leaving at 10:22 a.m. was
18 not Steven Cozzi?

19 A. So I took images. I took images of the paused
20 surveillance footage showing Steven Cozzi coming in and
21 then the individual with the wagon leaving the building.
22 And I showed those to Blanchard and Rebecca Watters.
23 And I asked them, hey, is this Steven coming to work.
24 They said that it was. And then I showed them the image
25 of the individual with the wagon, and they both

1 immediately said that it wasn't.

2 Q. And did they give any details as to what it was
3 about the person leaving that led them to the belief
4 that it was not Steven Cozzi?

5 A. I believe just the individual's build, the way
6 they moved, but they just said immediately that it
7 wasn't him.

8 Q. Do you have some specifics as to the difference
9 in build at the time?

10 A. Let's see exactly what they --

11 Q. And what page of your report are you
12 referencing, if you don't mind?

13 A. Sure. Give me one second and I'll -- so 191.

14 Q. Okay.

15 A. The last whole paragraph at the bottom, they
16 just said that the individual entering the building was
17 Steven Cozzi and the one leaving was not.

18 Q. Okay.

19 A. But I don't have any further detail on that.

20 Q. Okay. So does that mean that they did not
21 provide you with any additional detail?

22 A. Not that I recall.

23 Q. Okay. I think I asked this, and I don't know
24 that you knew the -- could give me the exact answer, but
25 can you tell me how many outside doors there are to

1 Building B?

2 A. I don't know exactly how many doors there are.

3 Q. Okay. When we take the little lunch break, are
4 you able to review your reports and see if you can
5 figure that out and let us know after lunch?

6 A. I can take a look and see what's there now.

7 Q. Okay. You want to do that?

8 A. I don't think I noted it in any of my reports.

9 Q. Did you have a layout of the building, the
10 whole building?

11 A. I did.

12 Q. Okay. Do you have that available -- might that
13 tell you?

14 A. Let me see if I can find that. I apologize.
15 It will take a minute to load.

16 Q. Yeah. Take your time.

17 Of course. I'll be right back.

18 A. Sure.

19 (The deposition was recessed from 12:37 p.m. to
20 12:38 p.m.)

21 BY MR. BRUNVAND:

22 Q. Did you find it?

23 A. I just found it, yep.

24 Q. Okay. Does that help you?

25 A. Hang on. I'm pulling it up.

1 Q. Okay.

2 A. So this floor plan, it doesn't note the front
3 door to the foyer, but there are two exterior doors on
4 what would be the -- what would be the west side.

5 Q. Facing Belcher?

6 A. Facing Belcher, three on the south side.

7 Q. Okay.

8 A. And then it doesn't list any on the east side.

9 Q. The south side is in proximity to where Steven
10 Cozzi's car was; correct?

11 A. Correct.

12 Q. Okay. And then it didn't show any doors on
13 what side?

14 A. No doors on the east side.

15 Q. No doors on the east side.

16 Okay. Do you recall if there were any doors on
17 the east side?

18 A. I don't recall.

19 Q. Okay. All right. And then on the north side,
20 one door?

21 A. On the north side, and this floor plan doesn't
22 show it, but yes, there was at least one exterior door.

23 Q. Okay.

24 A. But it doesn't show that on the floor plan.

25 Q. Okay. So that would be five or six doors,

1 based on what you're seeing there?

2 A. Correct.

3 Q. Okay. On the morning of March 22nd, 2023, you
4 interviewed Michael Montgomery along with Detective
5 Hunt?

6 A. Correct.

7 Q. And where did that interview take place?

8 A. At Montgomery's residence.

9 Q. Okay. Did you advise him of his Miranda
10 rights?

11 A. No, we did not.

12 Q. Okay. Why not?

13 A. He wasn't in custody.

14 Q. Okay. Was he free to leave?

15 A. He was.

16 Q. Was he free to decline participating in the
17 interview?

18 A. He was.

19 Q. Okay. And was he told that?

20 A. He was.

21 Q. Was that interview recorded?

22 A. It was.

23 Q. From beginning to end?

24 A. Yes.

25 Q. During that interview, did -- do you recall

1 Michael Montgomery telling you that he had entered the
2 bathroom on 1501 Belcher and that he did not notice any
3 blood?

4 A. Yes, he did say that.

5 Q. Okay. And he's talking about on March 21st,
6 right, that he did not see any blood?

7 A. Correct.

8 Q. And he also had indicated that he touched
9 different items within the bathroom during that time
10 period?

11 A. Stall door inside the bathroom, yes.

12 Q. Was he there to use the bathroom?

13 A. I don't believe so, no.

14 Q. Do you know so?

15 A. I don't know so.

16 Q. Presumably, unless the door to the bathroom was
17 open, he would also touch the door handle to the door
18 when he entered the bathroom?

19 A. Can you repeat that?

20 Q. Yeah.

21 You had said that he touched the stall door
22 inside the bathroom, but presumably, if he entered the
23 bathroom, he would also have to touch the door handle to
24 the outside door that opens up into the bathroom. Is
25 that a fair assumption?

1 A. I don't know what parts of the door he would
2 have touched or didn't.

3 Q. Right.

4 A. He touched the stall -- the stall door.

5 Q. Right.

6 But when you enter the bathroom, either you
7 or -- when you first enter the bathroom, either you or
8 Officer Bure opened the door; right?

9 A. Correct.

10 Q. And then that's -- you had to open it to get
11 into the bathroom?

12 A. Correct.

13 Q. And I'm just saying, presumably Mike Montgomery
14 would have had to do the same thing before he can get to
15 the area where he would have touched the stall door.

16 A. Oh. You're talking about touching the exterior
17 door.

18 Q. Right. Yeah. Yes.

19 A. I would imagine so, yeah.

20 Q. Okay. All right. Do you know whether or
21 not -- I believe there was a Wells Fargo card that was
22 missing from Steven Cozzi's wallet?

23 A. Initially we believed that, correct.

24 Q. Okay. You say initially you believed that, but
25 was that an error, or was it located?

1 A. It was. It was located in the wallet when --
2 Detective Hunt had it and he was going to return it to
3 Montgomery, and at that time he located the card in the
4 wallet.

5 Q. Okay. So it was basically an oversight
6 initially when the belief was that it was missing?

7 A. Correct.

8 Q. And who is it that suggested that it was
9 missing originally?

10 A. I believe it was Montgomery.

11 Q. Okay. All right. Did he actually handle the
12 wallet and look for the Wells Fargo card, or was it
13 shown to him?

14 A. I don't know if he handled it or if it was
15 shown to him.

16 Q. Okay. Did you do any investigative work
17 relating to whether or not Steven Cozzi had reactivated
18 his Grindr account?

19 A. No, I did not.

20 Q. Do you know who was responsible for cleaning
21 the bathrooms of 1501-B Belcher?

22 A. I believe it was Debra Heinrich --

23 Q. Okay.

24 A. -- but I don't know that for certain.

25 Q. Did you have contact with Todd Tensley?

1 A. I don't recall specifically talking to Todd
2 Tensley.

3 Q. Okay. On page 256 there's two -- the top two
4 of the last three paragraphs.

5 A. Mm-hmm.

6 Q. Review that and see if that refreshes your
7 memories about Todd Tensley.

8 A. So this was information relayed to me by
9 Detective Compton.

10 Q. Right. Right.

11 But you're familiar with the information?

12 A. Yes. Yes.

13 Q. Okay. And so this is information that Todd
14 Tensley had provided to Detective Compton?

15 A. Correct.

16 Q. He -- I believe he indicates that sometime
17 after 10:00 a.m. he entered Building B, smelled a strong
18 odor of bleach, looked inside the bathroom, and
19 described it to Detective Compton as a mess with paper
20 towels or toilet paper everywhere, and paint on the wall
21 looking stripped. Is that accurate?

22 A. That is.

23 Q. Okay. So you, yourself, did not actually have
24 any -- you didn't interview Tensley; right?

25 A. No.

1 Q. This is all from what Compton told you?

2 A. Correct.

3 Q. What's the significance, if any, from your
4 perspective, of the stripped area of paint?

5 A. It appears that it -- it appears that some kind
6 of chemical could have eaten away at the paint.

7 Q. Okay.

8 A. That's how it appeared to me, but beyond that,
9 I couldn't say what or how or...

10 Q. You can't tell what product may have been used?

11 A. No. There's a number of products that could do
12 that.

13 Q. Yeah.

14 Do you know what testing was done on that area?

15 A. I do not.

16 Q. Do you know -- and you probably have to refer
17 to your report, but do you know Steven Cozzi's weight on
18 March 21st, 2023?

19 A. Yeah. I'll see what it was.

20 It's not directly listed on report; not that I
21 see.

22 Q. So you don't have it anywhere?

23 A. I believe he was about 190.

24 Q. Okay. Where do you get that from?

25 A. From the name section. There's more in our

1 records management system. There's a deeper names
2 portion that shows that.

3 Q. And that lists his weight at 190?

4 A. 190, correct.

5 MR. BRUNVAND: All right. Maybe this would be
6 a good time to take a break. Let me see here. It's
7 eight minutes to 1:00. I'm going to pause the
8 recording for a second here.

9 (The deposition was recessed from 12:52 p.m. to
10 1:21 p.m.)

11 BY MR. BRUNVAND:

12 Q. Detective, the tracking of the Toyota truck
13 from 1501 Belcher to Tarpon Springs, when did that
14 conclude?

15 A. When we got to 503 Seaview Drive.

16 Q. Okay. I guess that was not what I meant.

17 Like, on what day and what time, I guess, did
18 you arrive at that location?

19 A. So the 23rd.

20 Q. Okay. That was the --

21 Q. That was the 23rd. I don't have an exact time.
22 I know it was in the morning.

23 Q. It was in the morning?

24 A. Correct.

25 Q. How can we get an exact time or at least very

1 close to an exact time?

2 A. When we arrived at 503 Seaview?

3 Q. Right.

4 A. I honestly don't know.

5 Q. Okay. When you arrived at 503 Seaview, did you
6 know that Tom Kosowski's house was next door?

7 A. We did.

8 Q. Okay. When did you obtain that information and
9 how did you obtain that information?

10 A. I think either the 22nd or the 21st, we had
11 researched him just to see if he might own a Toyota
12 pickup truck.

13 Q. Okay.

14 A. So we were aware of his address. We were aware
15 of the address and we were aware of the location, but we
16 found that he didn't own the Toyota pickup.

17 Q. Okay. As you're heading north from Belcher and
18 gathering surveillance videos, when does that process
19 start?

20 A. That process had started on the 21st. We
21 started with the gas station just north of 1501. I
22 believe it's 1499 South Belcher Road. We had started
23 with that gas station, and we started with the business
24 just to the south of 1501. I don't recall the address
25 offhand.

1 Q. The one that's right close to the soccer field,
2 then?

3 A. Yep. Profusion, I believe is the name of the
4 business.

5 Q. Right.

6 A. And with those two businesses we learned of the
7 PSTA bus that traveled alongside the Toyota Tundra.

8 Q. So to get -- you get those two locations, you
9 obtain the video footage on those two locations. In
10 viewing that video footage, you can't see the
11 driver; correct?

12 A. Correct.

13 Q. But you notice the bus?

14 A. Correct.

15 Q. Okay. And the bus is with what company?

16 A. It's PSTA.

17 Q. Okay. Is that a public --

18 A. Yes.

19 Q. -- transit authority?

20 A. Yes.

21 Q. Okay. And so when you see the bus, did you
22 know that buses would have record -- or have recordings
23 on the buses?

24 A. I did not.

25 Q. Okay. How did you find out that that was

1 significant?

2 A. I forgot what detective requested it, but they
3 made a request of PSTA to try to identify the bus --

4 Q. Okay.

5 A. -- and to see if that bus recorded.

6 Q. Okay. And so when -- when did you obtain that
7 information?

8 A. That was -- let's see. That was the morning of
9 the 22nd.

10 Q. Okay.

11 A. That was provided with the surveillance footage
12 from the bus.

13 Q. At what time?

14 A. In the morning hours. Sorry. I apologize.

15 Q. Okay.

16 A. I got an email from Detective Wedin at
17 10:59 a.m. regarding the surveillance from the bus.

18 Q. And the email, does it say we just received it
19 or I reviewed it and here's relevant information?

20 A. He -- that it had been reviewed, and he
21 showed -- he sent still images from the surveillance as
22 well.

23 Q. Okay. And so the images and surveillance from
24 the bus, where did that take you?

25 A. We know that it continues north on Belcher.

1 Q. Okay. For how long?

2 A. To Gulf to Bay is the area I recognized, or
3 just south of Gulf to Bay.

4 Q. All right. And then, is that the end of the
5 bus surveillance, just south of Gulf to Bay?

6 A. I believe so.

7 Q. Okay. And what's the next link in the
8 surveillance?

9 A. So the next address, the next -- so I wasn't
10 part of the search for the surveillance footage. The
11 next address, off the top of my head, I don't know, but
12 I know they were all documented. I know it wasn't far
13 from there. I believe there was some in the area of
14 Belcher and Drew. Then from there, I don't know the
15 next.

16 Q. How do you end up -- so you're heading north
17 and it's still on Belcher; right?

18 A. Correct. Correct.

19 Q. At some point, you're heading west. How does
20 that happen?

21 A. So there are Flock cameras. Flock is just a
22 name brand of the license plate reader database and
23 camera company.

24 Q. Right.

25 A. Detective Gay had searched the license plate

1 that was observed, or she had searched by vehicle, just
2 by vehicle description, and found an image of that truck
3 on Klosterman Road within a reasonable time period with
4 the wagon with the red covering in the back.

5 Q. Okay.

6 A. So it was a Flock camera on Klosterman heading
7 west, correct.

8 Q. Okay. All right. So there's still a bit of
9 time in distance to go to get to Dr. Kosowski's
10 neighborhood?

11 A. Correct.

12 Q. So what's the next thing that takes you to his
13 neighborhood or closer to his neighborhood?

14 A. So along the route, there were several other --
15 like 1612 Explorer Drive, 1704 Grand Central Drive.

16 Q. How do you guys know to go to those addresses
17 and look for surveillance?

18 A. I think they were driving along the route, and
19 because the truck was headed in that general direction,
20 they kept traveling down roads that the truck was on and
21 following known paths until they saw cameras visible
22 from the road.

23 Q. Is there a time before you get to the house
24 that's just south of Dr. Kosowski's home where law
25 enforcement is starting to suspect that this is going to

1 to lead us to Dr. Kosowski's house?

2 A. There is, but I don't recall a specific time.

3 Q. You don't know when that was?

4 A. No. I couldn't point to a specific instance,
5 just that this vehicle is traveling to Tarpon Springs in
6 the direction of that address.

7 Q. How were you guys communicating during all
8 this?

9 A. By email, by radio, by phone.

10 Q. Okay. Texting?

11 A. Sure.

12 Q. Okay. Texting, email, phone?

13 A. Correct.

14 Q. And the phones that you guys would text, are
15 these agency-issued phones or your personal private
16 phones?

17 A. Some of both.

18 Q. Some of both? Okay.

19 A. Some of both.

20 Q. Right. Right.

21 Some people might use the agency-issued, some
22 people might use the private phone?

23 A. Correct.

24 Q. Okay. Okay. Do you guys have a policy when
25 there's potential using, for example, a private phone

1 that none of that communication be deleted?

2 A. I'm not aware of the specifics of the policy.

3 Q. Okay. Do you know whether you used your
4 private phone or your agency-issued phone during this
5 investigation?

6 A. Both.

7 Q. Okay. Have you preserved everything on both of
8 those phones from this related to this investigation?

9 A. I don't preserve text messages on my private
10 phone.

11 Q. So the messages that you may have sent to your
12 private phone during this investigation would most
13 likely be deleted by now?

14 A. Correct.

15 Q. Is it set up on some sort of an auto delete?

16 A. No, just periodically.

17 Q. Okay. Do you know with certainty that you
18 deleted any communications you had during this
19 investigation from your cell phone?

20 A. Yeah. I'll go back and delete the entirety of
21 the history.

22 Q. Who would you communicate with via your
23 personal cell phone during this investigation?

24 A. Any of the other detectives involved.

25 Q. Okay. So that would be Hunt?

1 A. That would be Hunt, Allred. I'll go, it's
2 Detective Compton, Detective Hunt, Detective Allred,
3 Detective Sinni, Detective Gay, Detective Wagoner,
4 Detective Moore, Detective Wedin, would have been
5 Sergeant Vigenski, Christy Lomonaco at the time.

6 Q. The -- your private phone, what's the company
7 that you have your service with?

8 A. Verizon.

9 Q. Okay. Okay. So, roughly, at what point in
10 time would you say it's determined that it's a
11 possibility that the path that you're taking might be
12 leading you to Dr. Kosowski's home?

13 A. I would say around the time we saw the vehicle
14 turning west on Klosterman, we began to believe that was
15 a possibility.

16 Q. Okay. And, again, when was it that you
17 actually see the vehicle turning west on Klosterman? Is
18 that on the 22nd, 23rd?

19 A. I believe that was on the 22nd.

20 Q. Okay.

21 A. And I don't recall -- I think that was sometime
22 in the afternoon or late in the afternoon, but I don't
23 recall exactly.

24 Q. Okay. I want to go back briefly to your
25 comment about back at the original location where the

1 bathroom -- where you had indicated that there was a
2 significant bloodletting event.

3 Do you know whether or not luminol interacts
4 with urine?

5 A. I do not.

6 Q. Okay. Do you know whether or not it interacts
7 with cleaning products?

8 A. I don't know what specifically it interacts
9 with.

10 Q. Okay. Did you discuss with either Supervisor
11 Murphy or Camacho what luminol might interact with in
12 addition to blood?

13 A. Biological fluids. I remember talking to him
14 about it. I don't remember the specifics of the
15 conversation.

16 Q. Okay. So biological fluids.

17 Did they say -- do you recall whether or not
18 they mentioned other fluids as well; cleaning products?

19 A. I don't recall. I don't recall what they said
20 it reacts with.

21 Q. Okay. Knowing -- and I believe you know now
22 that there are many other products that can cause a
23 positive reaction for luminol.

24 Knowing that, does that have any impact on your
25 conclusion that there had been a significant

1 bloodletting that had occurred in the bathroom?

2 A. It's hard to say without testing the areas that
3 we saw. Without testing every single bit of it it's
4 hard to say what would and wouldn't be.

5 Q. Okay. Okay. Depending if the area was tested,
6 that would be something you would want to know more
7 about --

8 A. So --

9 Q. -- before you maintain that conclusion?

10 A. So what I could see prior to the luminol was a
11 dark -- was a dark-colored liquid, and that was smeared
12 across the majority of the floor in the stall. And from
13 what I saw there to what I saw with the luminol
14 photograph, they appeared on the consistent sides.

15 So to say that there was something in addition
16 that I couldn't see or that didn't contrast on the
17 floor, like a -- maybe not such a viscous liquid -- I
18 mean, what I -- from what I visually saw prior to the
19 luminol, the luminol photos appeared consistent with
20 what I saw on the floor.

21 Q. And the floors were photographed; right?

22 A. Right.

23 Q. Prior to luminol?

24 A. Correct.

25 Q. And we can see whatever you saw on the floor in

1 those photographs?

2 A. Correct.

3 Q. You've seen those photographs, I assume?

4 A. I have.

5 Q. Okay. And you can't say that what you see in
6 the photographs is blood? You can't say that?

7 A. No.

8 Q. Okay. So would it be fair to say you had to
9 rely on the experts, you know, to tell you, you know,
10 what that is and how much they tested?

11 A. That's correct.

12 Q. Okay. And would it be fair to say you had no
13 knowledge of the cleanliness or the lack of cleanliness
14 in that bathroom prior to your arrival?

15 A. Correct.

16 Q. I mean, if I tell you that urine could cause a
17 possible luminol reaction, does that have an impact on
18 your conclusion that there had been a significant
19 bloodletting event?

20 A. Yeah. I mean, it would take further testing.

21 Q. Okay. So would you agree, then, maybe the
22 better judge of whether or not there was a significant
23 bloodletting event might be the experts that do the
24 testing?

25 A. Correct.

1 Q. Okay. Did a name of Edward Jarzembowski come
2 up in your investigation?

3 A. It did. Jarzembowski?

4 Q. Yes.

5 Tell us about him.

6 A. Yeah. I was contacted by a latent examiner
7 with the sheriff's office that notified me they had made
8 an identification of a latent lift the name
9 Jarzembowski.

10 Q. Okay.

11 A. And it was on an interior south door,
12 southeast -- interior south door southeast office is
13 where the lift was labeled as being collected from.

14 Q. Is that the door in the vicinity of the utility
15 closet?

16 A. No. I believe it's the south door of one of
17 the vacant offices on the south side of the building.

18 Q. Okay. On the interior or exterior?

19 A. I don't know. The label doesn't -- the label
20 doesn't make that clear.

21 Q. Okay. So if fingerprint -- do you know if it
22 was a complete fingerprint, a partial fingerprint?

23 A. I don't know.

24 Q. Okay. And so did you reach out to him?

25 A. I did later down the road. He said that he had

1 worked in that office. He confirmed that he had
2 previously been employed by a company that previously
3 occupied that space. Let me -- give me one second to
4 find that.

5 So it was his right middle finger that had been
6 identified, and it -- yeah. The better description is
7 the interior south door, southeast office was what the
8 identification was labeled as. Jarzembowski was
9 currently living in Michigan. He had worked for
10 Construction Contractor Services and that company was in
11 Suite B-5. And he described the office as being on the
12 south side of the building on the opposite side of the
13 veterinary office and farthest from Belcher Road. He
14 said that the company had moved out of that office in
15 August of '22.

16 Q. Okay. There's an address, 2640 Woodhall
17 Terrace in Palm Harbor. Is that related to him?

18 A. It was from our initial research where we got
19 the name.

20 Q. Okay. But he's currently living in Michigan?

21 A. Currently, yes.

22 Q. Okay. And your interview, was it recorded?

23 A. No, it was not.

24 Q. Is he -- was he a person of interest?

25 A. Only that his -- only that he was one of the

1 latents that was identified.

2 Q. How many latents were identified in there?

3 A. There were of people of -- of people other than
4 law enforcement, there were four.

5 Q. Okay. Do you know if Mr. Jarzembowski had any
6 connection to TBVS or to Blanchard Law or Ronati, the
7 other companies that were there?

8 A. He always said that he had previously dated an
9 employee of Tampa Bay Veterinary Services.

10 Q. Okay. And when was that?

11 A. He didn't say.

12 Q. Okay. And when did he say that he had left for
13 Michigan?

14 A. I don't have that. Yeah. I don't have that
15 information.

16 Q. Okay. Did you do anything to verify that he
17 wasn't, in fact, in Michigan?

18 A. To verify that he was in Michigan, I did not.

19 Q. Did you try to contact the person that he had
20 dated with TBVS?

21 A. I did not. He didn't say who it was.

22 Q. Did you ask him who it was?

23 A. No, I don't recall asking.

24 Q. Okay.

25 Q. So March 22nd, you had indicated you guys ended

1 up at the house just south of Dr. Kosowski's home in
2 Tarpon Springs; right?

3 A. March 22nd, I think we ended at the -- I think
4 we ended with the Flock cameras.

5 Q. Right.

6 And then we talked about the Flock cameras. We
7 talked about when the vehicle was determined to have
8 turned left onto Klosterman. You guys started
9 suspecting that maybe there might be a connection
10 because you knew the address was in that direction of
11 Dr. Kosowski; right?

12 A. Correct.

13 Q. Okay. And when was it again that you ended up
14 at the neighbor's house? At what time?

15 A. That was on -- the neighbor's house was on the
16 23rd, and I don't know what time -- I don't know what
17 time they met with the neighbor.

18 Q. Okay. On the 22nd of March, I believe there
19 was a drive-by of 511 Seaview and a neighborhood canvass
20 around 511 Seaview by Detective Wagoner, Sinni and
21 Wedin. Is that accurate?

22 A. I believe so. If they noted it in their
23 reports, then yeah.

24 Q. In the evening of March 22nd?

25 A. I believe if that's --

1 Q. Why don't you try to verify that, because I
2 don't want you to --

3 A. Sure.

4 Yeah. I see in Detective Sinni's supplement he
5 notes it.

6 Q. Okay. Do you know who ordered this
7 surveillance in the evening hours of March 22nd?

8 A. I don't.

9 Q. But you're the lead detective?

10 A. I am.

11 Q. Did you tell them to go do surveillance of
12 511 Seaview?

13 A. I don't recall telling them that.

14 Q. Okay. What about the neighborhood canvass at
15 the same time? Did you order that or ask them to do a
16 neighborhood canvass?

17 A. I don't recall asking them to do that. I know
18 there were a lot of group discussions about what would
19 be next, where to go, where to look.

20 Q. Okay.

21 A. I wasn't specifically -- not everything was
22 done at my direction, you know. A lot of people kind of
23 took it upon themselves to look in places where we might
24 find something or to see if there was anything
25 verifiable.

1 Q. When you say "group discussions," did you guys
2 have, like, somewhere group text messages going on where
3 you guys were communicating all together about different
4 things that were happening in the investigation?

5 A. There was coordination of meetings, but a lot
6 of times we called each other directly. There were a
7 few meetings where we met in person. We'd coordinate
8 where we were going to meet.

9 Q. Sure.

10 But were there also group text messages where,
11 like, you know, the core group of detectives, you know,
12 can send one message and it would update everybody else?

13 A. There were.

14 Q. Okay. So I would imagine like if they go up
15 and do the surveillance in a neighborhood that maybe
16 someone would text to the group and say we're here and
17 we talked to so and so, or, you know, were those type of
18 things happening?

19 A. Yeah.

20 Q. Okay. Good.

21 Do you know whether or not any of the other
22 detectives may still have those text messages, or do you
23 think that they've all been deleted?

24 A. I don't know.

25 Q. Okay. All right. Do you know whether the

1 detectives when they were up there on the evening of the
2 22nd, do you know if they patrolled on foot or if they
3 just drove by?

4 A. I don't know.

5 Q. You don't know?

6 A. I don't know.

7 Q. Okay. You don't know whether or not they may
8 have walked -- for example, there's an easement on the
9 north side of the property. Do you know if they may
10 have gotten out of the car and walked down the easement?

11 A. I don't know.

12 Q. Okay. Would you say that Dr. Kosowski was a
13 person of interest at that time?

14 A. He was.

15 Q. Was he a suspect at that time, the evening of
16 the 22nd?

17 A. It's hard to say a time that -- definitive time
18 to put a label on that.

19 Q. Okay.

20 A. I wouldn't be able to do that.

21 Q. Do you know whether or not they knocked on the
22 door of 511 Seaview on the evening of the 22nd?

23 A. I don't know that they did.

24 Q. Do you think as the lead detective that you
25 would have that information if they knocked on the door?

1 A. Yes.

2 Q. Okay. So if you don't know, can we assume that
3 that did not happen?

4 A. I don't believe it happened.

5 Q. Okay. All right. So from your recollection,
6 it was never communicated to you via email, phone call,
7 or text message?

8 A. No, not that I recall.

9 Q. On page 94 of the complete report that we got
10 today.

11 A. Okay.

12 Q. And it's the Wagoner -- Lance Wagoner's report,
13 he's talking about on the 22nd doing the neighborhood
14 canvass on 511. It's the second paragraph from the
15 bottom.

16 A. Okay.

17 Q. You see that?

18 A. Yep.

19 Q. Okay. And it says, "Detectives were attempting
20 to obtain surveillance video. Kosowski is in the gray
21 Toyota Tundra as he returned to his home from where the
22 incident took place." And then it says, "After
23 canvassing the neighborhood, I assisted in securing the
24 residence prior to the search warrant being executed on
25 Kosowski's residence." And this is on -- according to

1 the report, on March -- Wednesday evening, March 22nd?

2 A. Yeah, I see that.

3 Q. So what did he mean by securing the house? Do
4 you know?

5 A. No, I don't.

6 Q. Do you have any information what he reported to
7 you that he was securing the house?

8 A. No. I'm not sure what that means.

9 Q. And I think I've asked you this but I'll ask
10 you again. Do you know whether or not Detective
11 Wagoner, Detective Wedin and Detective Sinni were all
12 three at the house when it was being secured by Wagoner
13 on the evening of March 22nd?

14 A. I don't know exactly what their whereabouts or
15 their actions were.

16 Q. But you agree that it appears at least Wagoner
17 was there doing that?

18 A. It appears that way.

19 Q. All right. And as it relates to Wagoner as
20 relating to Detective Sinni and Detective Wedin, do you
21 recall if they reported anything to you regarding the
22 surveillance on March 22nd, 2023?

23 A. No, I don't recall.

24 Q. Okay. If you still had your text messages,
25 would it be possible that there might have been some

1 messages on there that could refresh your memory about
2 it?

3 A. I don't know if they sent anything about it or
4 if there was anything of note.

5 Q. So it might be possible that if you had them
6 that it might refresh your memory, if they had sent
7 something?

8 A. If they had sent something.

9 Q. Okay. Do you know whether or not during the
10 time period on March 22nd, whether or not Detective
11 Wagoner, Sinni or Wedin took any photographs?

12 A. I don't.

13 Q. No?

14 A. No, I don't know of any.

15 Q. Okay. Do you recall whether or not any
16 photographs were shared via text message?

17 A. I don't recall.

18 Q. Might have been photographs shared via text
19 message?

20 A. I don't -- I don't know.

21 Q. You're not sure?

22 A. I'm not sure.

23 Q. When did you realize that Dr. Kosowski was not
24 at home at 511 Seaview?

25 A. On the 23rd, Detective Hunt and I approached

1 his residence at about 11:25 a.m. and attempted to make
2 contact with him. We got no answer.

3 Q. Okay. All right. That, in and of itself,
4 doesn't necessarily mean that he's not home; right?

5 A. Correct.

6 Q. It means he isn't answering?

7 A. Correct.

8 Q. Do you know when you became aware of the fact
9 that he was not home, or did you become aware of that?

10 A. Well, much later that evening when we served a
11 search warrant at his house and no persons were found
12 inside.

13 Q. Okay. So before you served the search warrant,
14 it's your belief that you guys did not know whether that
15 he was home or not?

16 A. Correct.

17 Q. Okay.

18 A. At least he wasn't answering, yep.

19 Q. Do you know -- were you calling his cell phone
20 or house phone?

21 A. I'm sorry?

22 Q. Were you calling his cell phone number or a
23 house phone number?

24 A. I don't recall making a phone call to him.

25 Q. Oh. You're just saying he wasn't answering the

1 door?

2 A. The door, correct.

3 Q. All right. Got it.

4 Do you know whether or not Wagoner, Sinni or
5 Wedin used Axon body cams when they were doing the
6 surveillance?

7 A. I don't know.

8 Q. On March 23rd, did you indicate in your report
9 that you called Lieutenant Forcade with Pinellas County
10 Sheriff's Office AFIS division and gave Kosowski's
11 identifying information as a suspect?

12 A. I did.

13 Q. Do you know if this was after you had
14 received the forensic technologist results for Edward
15 Jasionowicz?

16 A. It was after that.

17 Q. It was after. Okay.

18 A. Yep.

19 Q. And that's because those fingerprints were
20 identified the day prior --

21 A. Correct.

22 Q. -- the 22nd? Yes?

23 A. Yes.

24 Q. Okay. So what time do you contact Lieutenant
25 Forcade and tell him that Kosowski is now a suspect?

1 A. Well, at 10:25, I returned a missed call from
2 him, and he was asking me if there was anybody being
3 considered a suspect. I provided him with Kosowski's
4 information. At the time, he just asked if anybody was
5 considered a suspect. We just floated the name because
6 it was where the surveillance was starting to take us
7 to.

8 Q. Okay. Was Edward Jarzembowski, was he
9 considered a suspect at that time?

10 A. Not at that time.

11 Q. Okay. Had you spoken with him at that time?

12 A. No, we hadn't.

13 Q. Okay. What was it at that point in time that
14 caused you to feel comfortable about telling Lieutenant
15 Forcade that Kosowski was a suspect?

16 A. It was that the vehicle was headed in the
17 direction of his property. The only name we had come
18 across and it was really the only thing we had.

19 Q. Okay. How much time would you say elapsed from
20 the time that you gave Lieutenant Forcade Kosowski's
21 identifying information when he called you and said he
22 had a match?

23 A. I have noted in the report that it was the same
24 day, but I don't have the time he called me with that.

25 Q. Okay. Would you -- were you -- did you likely

1 call him from your cell phone?

2 A. I believe he called my work cell.

3 Q. Okay. Okay. And your work cell, does that
4 automatically -- or not automatically, but do you also
5 on a regular basis delete text messages from that phone?

6 A. No. The City maintains those records.

7 Q. Okay. All right. Do you know who the
8 technician was that made the identification?

9 A. Oh. The latent examination report says the
10 examiner is Heather Legg.

11 Q. Okay. Do you recall whether or not Lieutenant
12 Forcade told you anything more about the print inside?

13 A. He told me that it was a left index finger, and
14 it was found on the interior portion of the utility
15 closet door.

16 Q. Did he tell you whether or not it was a partial
17 or full fingerprint?

18 A. He didn't specify.

19 Q. Did he tell you anything about the quality of
20 the fingerprint that they had matched?

21 A. No.

22 Q. Did he indicate to you anything about his level
23 of confidence that the latent prints, in fact, matched
24 Kosowski?

25 A. No.

1 Q. Did you ask him about his confidence?

2 A. I did not.

3 Q. Did you also speak with Lieutenant Forcade
4 about the 13 other fingerprints that were identified
5 from the utility closet door?

6 A. I don't recall doing so.

7 Q. At that point, was it your belief that you had
8 probable cause for a search warrant on 511 Seaview?

9 A. It was.

10 Q. Okay. And when -- what's the time, roughly,
11 that that's happening?

12 A. I believe that was the afternoon of the 23rd.

13 Q. Okay. You also did a knock-and-talk on the
14 23rd, which I think was you, Hunt, Wedin and Allred?

15 A. Correct.

16 Q. Did you have a layout of the property before
17 you did the knock-and-talk?

18 A. No.

19 Q. You didn't go online and try to find out the
20 layout of the property or anything?

21 A. I don't recall doing so. I don't know if
22 somebody else did. I don't remember.

23 Q. Okay. Was the knock-and-talk after you had
24 gone to the neighbor to the south of Dr. Kosowski?

25 A. I believe that that was before.

1 Q. Okay. Did you --

2 A. And I think some of those things might have
3 been happening in tandem.

4 Q. Okay. Did you walk around the property?

5 A. No.

6 Q. Did you walk down the easement that's north of
7 the property?

8 A. I did.

9 Q. Okay. By yourself or with someone else?

10 A. No, there were several other detectives. I
11 don't recall exactly who.

12 Q. Okay. And how far out on the easement did you
13 walk?

14 A. Until the mud got too deep to pass --

15 Q. Okay.

16 A. -- or until it became muddy, but I couldn't
17 tell you exactly how far.

18 Q. What kind of a view of the property did you get
19 from that vantage point?

20 A. I could see to the backyard.

21 Q. Did you take any photographs at that time?

22 A. Yes, I did.

23 Q. With your phone?

24 A. My work phone.

25 Q. Your work phone and not your private phone?

1 A. No.

2 Q. Okay. Does your work phone have the
3 geolocation information activated?

4 A. I honestly don't know.

5 Q. Okay.

6 A. I would imagine it does.

7 Q. Is it an iPhone?

8 A. It is.

9 Q. Okay. Do you have it with you?

10 A. I do.

11 Q. Do you have images on the phone at this moment?

12 A. They might still be there.

13 Q. Do you know how to look at the image and then
14 slide your finger up the screen and it brings up all the
15 geolocation stuff?

16 A. I'll try.

17 Q. Okay.

18 A. Let's see.

19 Okay. I see the photos.

20 Q. Okay. If you take -- pick up any one of the
21 images and put your finger on like the center of the
22 bottom of your phone and slide it up; it should give you
23 geolocation on the images.

24 A. It gives me the option to add a location.

25 Q. You see an option to add a location?

1 A. To add a location, yep.

2 Q. It doesn't look like it has the geolocation
3 activated?

4 A. No.

5 Q. Have all the images from your agency-issued
6 phone been uploaded to evidence?

7 A. They have.

8 Q. Okay. Do you know whether or not there is a
9 reason why the geolocation is unactivated?

10 A. No, I don't.

11 Q. Okay. How do you know that in walking along
12 that easement that you didn't end up on Dr. Kosowski's
13 property?

14 A. I was told that the fence appeared accurate
15 from the property appraiser's office or the property
16 appraiser's website.

17 Q. By whom?

18 A. Detective Wedin, I think, had researched that.

19 Q. Okay.

20 A. But I don't know if his property extends beyond
21 his fence line.

22 Q. Did he not, then -- if you research that, he
23 didn't, like, print out the property map?

24 A. I don't believe we have printers there
25 available at the time.

1 Q. Okay. Well, did he have it as an image on his
2 phone so you could look at it?

3 A. Either his phone or his computer, but I don't
4 recall seeing it.

5 Q. So he didn't have a hard copy, but he had it
6 either on his phone or a computer?

7 A. I would imagine.

8 Q. Okay. You didn't see it?

9 A. No.

10 Q. Is there a fence along the north property line?

11 A. There is.

12 Q. Okay. And so you never crossed the fence or
13 touched the fence?

14 A. I didn't cross or touch the fence, no.

15 Q. Okay. Did you also go to the back of the
16 property from the south of the property?

17 A. No. So I gave my phone to Detective Hunt, who
18 took photos from the south side.

19 Q. Okay. So you didn't go on the south side?

20 A. No.

21 Q. Who went on the south side?

22 A. I gave my phone to Detective Hunt.

23 Q. Okay. All right. So we have to ask Detective
24 Hunt about where on the south side he was? You don't
25 exactly know where he was?

1 A. Correct.

2 Q. Okay. Did anyone enter the backyard on
3 511 Seaview?

4 A. No, not that I'm aware of.

5 Q. Did anyone enter the backyard from the north
6 easement?

7 A. No, not that I'm aware of.

8 Q. And you're aware that you for sure didn't enter
9 it?

10 A. Correct.

11 Q. Okay. Are you able to check and see whether or
12 not if you were to activate your location data on the
13 phone if that will, in fact -- if maybe the data is
14 there that would show us the location?

15 A. I already tried.

16 Q. Okay.

17 A. Is that a setting through photos or...

18 Q. I don't remember.

19 A. There was an option to adjust location that I
20 see, but just -- that one is --

21 Q. It says -- if you go to settings, privacy,
22 security, location services, and then turn on location
23 services.

24 A. Settings.

25 Q. Privacy, security, location services, and turn

1 on.

2 A. Yep. Give me one second.

3 Privacy and security location services, it says
4 location services are on.

5 Q. It says it's on. Okay.

6 Do you have some IT people at Largo that maybe
7 can take a look at it and see if maybe there's a way of
8 finding the location?

9 A. It says for camera it's off.

10 Q. Oh. It says for the camera it's off?

11 A. Yeah.

12 Q. What if you turn the camera on and see if that
13 does anything for when you go back and look at the
14 images? I'm guessing probably not, but, you know.

15 A. That's just for the camera. It doesn't -- I
16 can turn it on for the camera.

17 Q. Right.

18 A. It doesn't say anything for the gallery. So
19 I'll just -- I'll turn it on for the camera, and then --

20 Q. See if that does. It probably does not.

21 A. -- open a new photo and see if it -- yeah, it
22 doesn't. It doesn't add anything.

23 Q. Okay. Okay.

24 Did any one of you, when you were walking
25 around the 511 Seaview, did any one of you have your

1 Axon Capture on?

2 A. I believe I used it to knock on the front door.

3 Q. Okay. Other than that?

4 A. Not that I recall, no.

5 Q. Okay. Do you know if the Axon Capture has GPS
6 information?

7 A. It should.

8 Q. Okay. Other than the fence on the north side
9 and getting into the deep mud, is there anything -- any
10 other landmarks that helped you make sure that you were
11 not entering the private property of Dr. Kosowski?

12 A. No, not that I recall.

13 Q. The fence that's on the north side of the
14 property at some point makes a sharp turn to the south.
15 And I believe you passed that when you walked out in the
16 mud area; is that correct?

17 A. I'd have to look at the photos --

18 Q. Okay.

19 A. -- for that.

20 Q. Take a look.

21 A. On the north side of the property?

22 Q. Right. I believe the fence goes out toward the
23 west and then turns south.

24 A. Yeah. I don't have a photograph showing the
25 back corner of the fence.

1 Q. Okay. Any other landmarks other than the
2 fence, and to make sure you were not entering onto
3 private property?

4 A. No.

5 Q. Okay.

6 A. Not that I see.

7 Q. Where are you when you're drafting the search
8 warrant affidavit for 511 Seaview?

9 A. I was in my car. It was either my car or
10 Detective Hunt's car. I don't recall.

11 Q. Okay. And what time do you upload it to
12 CloudGavel?

13 A. I'd have to check on CloudGavel.

14 Q. Okay. Can you do that?

15 A. There's an audit. Yeah. I have -- I have it
16 being started at 4:48 p.m. on the 23rd.

17 Q. 4:48 p.m. When you mean started, that's when
18 you started the upload?

19 A. So the audit trail just says "document
20 created."

21 Q. 4:48 p.m.?

22 A. Correct.

23 Q. And do you know what that means? Does that
24 mean when it was uploaded, or you don't know?

25 A. I don't know.

1 Q. How does it work? CloudGavel, how does it
2 work?

3 A. Sure. So it's an automated warrant service.
4 We write our probable cause or we write our affidavit.
5 We submit it to CloudGavel, and then it is passed
6 through accounts to a notary to the State Attorney and
7 then to a judge, and then it can be passed back from the
8 judge to us.

9 Q. So when the document -- when you're submitting
10 something or uploading something to CloudGavel, you
11 already drafted and completed the document, it sounds
12 like, or do you draft it on CloudGavel?

13 A. We can do either.

14 Q. Do you recall what you did on this particular
15 occasion?

16 A. I believe I just typed it in a Word document
17 and then copy and pasted.

18 Q. Okay. And so is it -- if you didn't do it as a
19 Word document, is it hard for you to access the document
20 on CloudGavel, or can you easily access it and upload
21 it?

22 A. I can easily access it. I can access the
23 completed document. So it has fillable fields, and then
24 it forms the rest of it.

25 Q. Okay.

1 A. If that makes sense.

2 Q. Yeah. Yeah.

3 So 4:48 p.m. is when the document is created.

4 That may have been the time when the affidavit was
5 submitted?

6 A. Correct.

7 Q. Okay. And what time --

8 A. May have.

9 Q. May have been later?

10 A. No. It just -- document created at 4:48.

11 Q. Okay.

12 A. Beyond that, I didn't get any other detail.

13 Q. Okay. So when does Judge Federico sign the
14 warrant?

15 A. 10:21 p.m.

16 Q. Okay. Do you know why it took -- takes so
17 long, I mean, 4:48 to 10:21 p.m.?

18 A. I don't.

19 Q. I guess I should say, is that a long time?

20 A. It's hard to say. The system was new to all of
21 us at the time, and it still is kind of new.

22 Q. All right.

23 A. So I don't really have a good frame of
24 reference for --

25 Q. Do you know so when you first submit it, it

1 goes to the notary, it goes to the State Attorney, did
2 the State Attorney get back with you and say, hey, we
3 need to change something, or have any questions before
4 it got submitted to the Court?

5 A. Yeah, we review drafts.

6 Q. Okay. Who were you reviewing drafts with?

7 A. Mr. Vonderheide.

8 Q. Okay. And were you, like, emailing him back
9 and forth or texting? How were you doing that?

10 A. No, we were emailing it.

11 Q. Okay. And do you know if that's before
12 4:48 p.m. or after you submitted it and then you go back
13 and forth? Can you look at the emails maybe? Maybe
14 that will tell you.

15 A. Yep.

16 Q. While you're looking for that, I'll be right
17 back.

18 A. Okay.

19 Q. Did you find it?

20 A. Yeah. I have a sent email to Mr. Vonderheide
21 at 5:41 p.m. --

22 Q. Okay.

23 A. -- and a reply at 6:07 p.m.

24 Q. Okay.

25 A. And then I replied back at 7:07 p.m.

1 Q. Okay. And are you making modifications on the
2 affidavit up until 7:07 p.m.?

3 A. Yes.

4 Q. Okay. So, presumably, final affidavit doesn't
5 get sent off to the Court until at some point after
6 7:07 p.m.?

7 A. Correct.

8 Q. Okay. All right. All right. So that's a
9 little bit over three hours before it's then signed by
10 Judge Federico; right?

11 A. That's -- yeah, that sounds correct.

12 Q. Okay. So at 10:21 p.m., do you get notified
13 via email that the warrant has been signed? How do you
14 get notified?

15 A. Yeah. So there's typically an email
16 notification, and then the CloudGavel user page you get
17 a notification.

18 Q. Okay. So can you tell us, when did you get the
19 notification, or was that the 10:21 p.m.?

20 A. That would be the 10:21.

21 Q. Okay. Did you have any involvement in deciding
22 that the SWAT team needed to be used for purposes of
23 doing the entry of the house?

24 A. No.

25 Q. Do you know who made that decision?

1 A. No.

2 Q. Does -- from your understanding of what's
3 required before starting the search, is a reading of the
4 search warrant a requirement before entering the
5 premises?

6 A. Before entering the premises?

7 Q. Yeah, before starting -- I'm -- before starting
8 the search.

9 A. Oh, prior to starting the search?

10 Q. Right.

11 A. I believe so, but I believe they can be done in
12 tandem.

13 Q. Okay. All right. And -- but prior to the SWAT
14 entering the premises, does it have to be read prior to
15 that?

16 A. No.

17 Q. Do you know why?

18 A. No, not off the top of my head.

19 Q. Okay. All right. Do you recall someone
20 reading the search warrant in this case?

21 A. Yes. Detective Melton with Tarpon Springs
22 Police Department.

23 Q. Okay. Prior to seeking the search warrant and
24 obtaining the search warrant, had you had instructions
25 that Largo PD could not conduct the search?

1 A. That's correct.

2 Q. And who advised you that Largo PD could not do
3 the search?

4 A. It was Mr. Vonderheide.

5 Q. Okay.

6 A. And Alex Spadaro. They were on the -- they
7 both conveyed the same message.

8 Q. Okay. Do you have an understanding as to why
9 Largo PD could not search the residence?

10 A. That was explained that it was a jurisdictional
11 issue and that the agency of jurisdiction would help
12 picking up the search.

13 Q. And that would be Tarpon Springs?

14 A. Correct.

15 Q. And that was explained by Mr. Vonderheide and
16 Alex Spadaro?

17 A. Correct.

18 Q. What did that mean as far as what involvement
19 you could have with the search itself?

20 A. I could be present and advise.

21 Q. Okay. So you could be present, you could say,
22 hey, look at that, look at that thing, or take that one
23 into evidence?

24 A. Yeah, that's how it was conveyed to us.

25 Q. Okay. And is that kind of what happened?

1 A. Yeah.

2 Q. Okay. Because Tarpon Springs didn't really
3 know a lot about the case; right?

4 A. Correct.

5 Q. So they sort of worked as an agent of Largo,
6 would you say?

7 A. Sure.

8 Q. Okay. So could not search didn't mean that you
9 guys couldn't be in the house during the search?

10 A. Correct.

11 Q. You just couldn't touch anything?

12 A. We couldn't search, yeah.

13 Q. So -- well, could you touch things? Could you
14 pick up things and look at them?

15 A. I mean, if that amounts to a search.

16 Q. Did you pick up things and look at them?

17 A. I don't recall specifically, but I'm sure I
18 did.

19 Q. Okay. Did you wear gloves?

20 A. No.

21 Q. Did you guys wear the little booties?

22 A. No, I didn't.

23 Q. Did you see anyone wearing them?

24 A. I don't recall. I don't recall seeing anybody
25 with booties.

1 Q. Did you handle any of the ammunition in the
2 home?

3 A. I don't recall handling any of it.

4 Q. Does that mean you may have, or...

5 A. No, I don't recall doing that.

6 Q. So you did not handle any ammunition?

7 A. No.

8 Q. Okay.

9 A. Not that I recall.

10 Q. Do you specifically recall handling any 9mm
11 rounds?

12 A. No.

13 Q. Do you recall what brands of 9mm ammunition was
14 in the home?

15 A. Not specifically.

16 Q. Did you personally take any of the ammunition
17 with you from the house?

18 A. No.

19 Q. Do you know whether or not Dr. Kosowski had any
20 STV brand ammunition in the house?

21 A. No.

22 Q. There was a cart in Dr. Kosowski's garage. Do
23 you recall the brand of that cart?

24 A. I believe it was Gorilla Cart.

25 Q. In the garage?

1 A. Correct.

2 Q. And do you recall the brand of cart that was --
3 that Christina Greene had indicated was in the
4 electrical closet at 1501-B Belcher?

5 A. I don't recall. I don't recall her providing a
6 brand name to me.

7 Q. Do you recall anyone telling you what kind of
8 brand the cart was in the electrical closet?

9 A. No, I don't. No, I don't recall anybody
10 telling us what brand that was.

11 Q. Okay. Do you recall whether or not the garage
12 door at the 511 Seaview was opened prior to the reading
13 of the search warrant?

14 A. I don't recall which happened first.

15 Q. Is there anything in your reports that could
16 assist you?

17 A. No.

18 Q. Did you have information at the time, shortly
19 before you -- the SWAT team entered and the search
20 warrant was executed, did you have information that
21 Dr. Kosowski was believed to be in Miami at that time?

22 A. I did.

23 Q. Okay. Tell me about that.

24 A. That was from -- Detective Moore had been
25 reviewing various license plate reader databases and

1 found that the license plate for his red Toyota
2 four-door was captured on the Tamiami Trail at
3 approximately -- or had been captured on the Tamiami
4 Trail on the 21st.

5 Q. Okay. When did you obtain that information?

6 A. That was on the 23rd, sometime in the afternoon
7 or over the course of the evening.

8 Q. Okay. All right. So the belief was that
9 511 Seaview was likely empty at the time of the search
10 warrant?

11 A. We believed it was possible, but we also
12 believed it was possible there could be other people
13 inside.

14 Q. Okay.

15 A. So we were -- we hadn't made a -- there was no
16 determination made.

17 Q. Okay. It turned out it was empty?

18 A. Correct.

19 Q. Okay. Knowing that Dr. Kosowski was not at his
20 home, do you know if any consideration was given to
21 reading the search warrant prior to the SWAT team
22 entering?

23 A. I don't know if there was consideration given
24 to that.

25 Q. You did not participate in such consideration?

1 A. No.

2 Q. Okay. Did you guys have a phone number for
3 Dr. Kosowski at the time?

4 A. Only the phone number that was used for the
5 case management conference on the 21st.

6 Q. Okay. And do you know whether or not that was
7 a cell phone number?

8 A. No. I don't believe we knew at the time. At
9 least I didn't know at the time. I can't speak to
10 anybody else.

11 Q. Did anyone try to phone that number to have
12 contact with Dr. Kosowski?

13 A. I'm not aware of anybody doing that.

14 Q. Was that discussed by, you know, maybe we'll
15 just call him and see if he'll let us search the house?

16 A. I don't recall a specific conversation.

17 Q. Okay. Generally, do you recall whether or not
18 that was discussed; do we call him or do we go get a
19 search warrant late at night?

20 A. I believe it was discussed. I don't recall a
21 specific conversation.

22 Q. Okay.

23 A. I believe that was -- that would have been
24 something we would have discussed, but...

25 Q. Okay. Would that have been discussed with

1 someone with Largo or with Largo and Tarpon Springs?

2 A. It could have been both.

3 Q. Okay. The text -- the group text messages, the
4 text messages, would that include Largo and Tarpon
5 Springs, or was that strictly between Largo detectives?

6 A. That would have just been us.

7 Q. Okay. Was there a multi-agency briefing prior
8 to the execution of the search warrant?

9 A. I believe there was.

10 Q. Who participated in that and who did the
11 briefing?

12 A. I don't know. I wasn't present for it.

13 Q. Okay. So you didn't debrief anyone?

14 A. No, I did not.

15 Q. Was there a Largo Police Department briefing?

16 A. Separate from a multi-agency?

17 Q. Yes.

18 A. I don't know.

19 Q. You didn't conduct such a briefing?

20 A. No.

21 Q. All right. And you were not present for one?

22 A. No.

23 Q. Had you shared your photographs that you had
24 taken with your private phone -- I'm sorry, with your
25 agency-issued cell phone with others to use at the

1 briefing?

2 A. I don't recall sending them to anybody to use
3 for the briefing.

4 Q. Okay. You may have, or you don't think you
5 did?

6 A. I don't think I did.

7 Q. Okay. Can you identify all the members from
8 Largo Police Department who were involved in the search?
9 And I guess it's the late evening of the 23rd and early
10 morning of the 24th; right?

11 A. Correct.

12 Q. Can you say who was present and participating
13 from Largo?

14 A. Myself, Detective Moore, Detective Sinni, and
15 then I don't recall who else. I believe Detective Hunt
16 was there. I think some others, but I think some
17 weren't. I don't believe everybody was on scene at the
18 time.

19 Q. Okay. Anyone else on scene in the house, in
20 the garage?

21 A. I believe it was Lieutenant Lomonaco was on
22 scene. We have Sergeant Caravella who was on scene.

23 Q. That it?

24 A. That I recall.

25 Q. Okay. Did you guys break up in teams inside

1 the house?

2 A. We did.

3 Q. Okay.

4 A. There wasn't specified who was with who, but
5 yeah, I remember separating.

6 Q. Okay. And separation. Do you recall who was
7 tasked with going into what area of the house?

8 A. No, I don't.

9 Q. Where did you go?

10 A. I was in the garage, and then I was all over
11 the house trying to oversee kind of what everybody else
12 was doing.

13 Q. Okay. You were overseeing what everyone else
14 was doing. Did you sort of designate certain areas for
15 the other detectives to have the primary focus on?

16 A. No, I didn't.

17 Q. Okay. So they just went wherever they wanted
18 to?

19 A. I think they kind of self assigned themselves
20 certain areas.

21 Q. Okay. But you don't know the breakdown of
22 that?

23 A. No, I don't.

24 Q. So you would rely on whatever is in the reports
25 as to what the various detectives indicated in their

1 reports?

2 A. I would.

3 Q. Okay. What about the Tarpon Springs Police
4 Department persons involved in the search? Were you
5 able to identify those people that were present?

6 A. I have Detective Melton --

7 Q. Okay.

8 A. -- and then Detective Miller. And I don't
9 recall if there was anybody else there from Tarpon
10 Springs.

11 Q. Did they have any specific tasks?

12 A. They were tasked with the search.

13 Q. Okay. But as far as the dividing of the house
14 and what have you?

15 A. No.

16 Q. Okay. Any other agencies involved in the
17 search that night? You've got Tarpon Springs, Largo
18 Police Department.

19 A. And the sheriff's office forensics.

20 Q. Okay. All right. And do you know the people
21 with the sheriff's department forensic who were present?

22 A. No. I don't have their names.

23 Q. Again, you would rely on what their reports
24 indicate?

25 A. Correct.

1 Q. But as far as specifically what they did, you
2 don't know that information as well?

3 A. No, that would be in their report.

4 Q. Okay. Specifically, what were your
5 responsibilities the evening and night of March 23rd?

6 A. To oversee the search, take note of what was
7 found, what was located, to advise on the search, to try
8 and differentiate between what had any evidentiary
9 value.

10 Q. Okay. And then the items that were taken into
11 evidence by Tarpon Springs Police Department, where do
12 they go from there?

13 A. I believe PCSO forensics collected those
14 together, and then custody of those was transferred to
15 us at a later date.

16 Q. Okay. Is it accurate to say that the search
17 was conducted with mixed teams, meaning mixed Tarpon
18 Springs, Largo, and the members of the sheriff's
19 department?

20 A. That's correct.

21 Q. How long did the search take? When did it
22 start and when did it end?

23 A. I believe the SWAT team made entry to the
24 residence shortly after 11:00 p.m., and then I don't
25 recall what time we concluded that.

1 Q. Can you look in your notes and see what time
2 the search ended?

3 A. I don't have an exact note in my report as to
4 what time we concluded that. The early morning hours.

5 Q. Okay. I mean, was there an email maybe sent to
6 Mr. Vonderheide or anyone else saying, hey, we're done,
7 we're on the way out of here, or...

8 A. No email that I have that says we concluded the
9 search.

10 Q. Okay. What about CAD notes? Will the CAD
11 notes help you at all?

12 A. Yeah. I'll check.

13 For that address, for 511 Seaview Drive, the
14 only CAD notes I have from Largo are dated the 28th.

15 Q. Okay. Is that -- would that be unusual not to
16 have CAD notes from Largo with the --

17 A. Not necessarily, not if it was done under
18 another agency or if it was a continuation of a call, a
19 continuation of what was logged in the follow-up at some
20 other address, but I don't have that.

21 Q. Okay. How many search teams total were there
22 for the search?

23 A. I don't know.

24 Q. In addition to you, how many detectives
25 participated in the search?

1 A. At least three of us that I recall, and two of
2 the detectives from Tarpon Springs, but again, there
3 could have been more. I don't recall exactly who was on
4 scene at the time.

5 Q. Okay.

6 A. Or sorry. Who participated in the search at
7 the time.

8 Q. Okay. What I understand, you don't have a way
9 of identifying the personnel within each team?

10 A. No, I don't.

11 Q. Who was responsible for maintaining a search
12 warrant inventory?

13 A. That would be Detective Melton.

14 Q. What agency is he with?

15 A. Tarpon Springs.

16 Q. Do you know whether or not a copy of the search
17 warrant inventory was left at the 511 Seaview Drive
18 after the search was completed?

19 A. Once we compiled a list of everything, I
20 believe I reviewed that with Detective Melton, and then
21 we discussed him affixing the inventory to the front
22 door.

23 Q. Okay. Do you believe that inventory was
24 affixed to the front door?

25 A. Yes.

1 Q. Okay. Was ATF present on the 23rd or the 24th?

2 A. That I'm aware of, no.

3 Q. Did you secure the firearms and ammunition that
4 was located within the residence?

5 A. I personally did not.

6 Q. Do you know if anyone did?

7 A. I don't know. I believe after the warrant the
8 front door would have been locked or otherwise secured.

9 Q. Okay.

10 A. Whatever the point of entry would have been.

11 Q. The great majority of the firearms and
12 ammunition that was located at the property, was it left
13 at the property?

14 A. That's correct.

15 Q. Did you take any firearms or any ammunition
16 into evidence?

17 A. At that time, from the inventory from that
18 property list, there was Beretta 9mm and the magazine,
19 unknown make, unknown caliber black semi-auto pistol, a
20 T&M. Nope, that's not a handgun. Unknown make, unknown
21 caliber handgun, or a black semi-automatic pistol. So
22 it looks like three.

23 Q. Do you know why those three were taken into
24 evidence as compared to all the other firearms that were
25 there?

1 A. I remember one of them had a suppressor on it,
2 and because we were uncertain of a mechanism of injury,
3 I believe that was the least possible. And then one of
4 them was -- one of them stuck out because it was in a
5 Ziploc bag in a backpack in a bedroom. It wasn't stored
6 the way the rest of the firearms were stored.

7 Q. Okay.

8 A. Kind of stuck out as odd as being in a Ziploc
9 bag. And then the other one was also in the black
10 backpack. The same backpack that the one with the --
11 the one that the Ziploc bag was in.

12 Q. Okay. Did you do anything with the remaining
13 firearms that were found that night?

14 A. I did not, no.

15 Q. What about the ammo?

16 A. No.

17 Q. What about the NFA items?

18 A. No.

19 Q. Did you locate the tax stamps for the NFA items
20 that night?

21 A. I specifically did not, no.

22 Q. Do you know if anyone did?

23 A. I'm not aware of that.

24 Q. So I'm assuming you did not photograph or make
25 photocopies of any of the tax stamps?

1 A. No, I did not.

2 Q. Did you or someone unload all the firearms and
3 render them safe?

4 A. All of the firearms in the residence? I'm not
5 aware of anybody doing that.

6 Q. Okay. How many firearms were there in the
7 residence?

8 A. I don't recall the exact number. I know there
9 were over 100. I don't recall if it was over 200. I
10 know Detective Compton has that exact number.

11 Q. Okay. Did you, yourself, handle any of those?

12 A. Not that I recall.

13 Q. Were a lot of these firearms secured in a
14 trailer in the garage?

15 A. I recall there being firearms in just about
16 every room in the house.

17 Q. Okay. But were there also a lot in a trailer
18 in the garage?

19 A. I don't recall if they were in a trailer. I
20 think there were some, but I don't recall exactly.

21 Q. Do you know how the trailer was opened and by
22 whom?

23 A. No, I don't.

24 Q. Do you know where the keys are to the
25 trailer -- I mean to the firearm? Sorry.

1 A. I do not know personally.

2 Q. To the tire -- to the trailer.

3 A. To the trailer, no, I don't.

4 Q. Detective Compton in his deposition had
5 mentioned that some lingerie was found and taken into
6 evidence.

7 What's the significance of the lingerie?

8 A. I'm not aware of lingerie being taken into
9 evidence. And I'm just looking at the property list
10 that we got from PCSO forensics.

11 Q. Mm-hmm.

12 A. Yeah. I don't see that on here. I don't know
13 anything about that.

14 Q. Do you think that was a mistake on the part of
15 Detective Compton if he said that?

16 A. I honestly couldn't say. I don't have it
17 listed in anything and I'm not aware of it.

18 Q. Okay. I'm assuming, therefore, you don't know
19 where it was found and who found it?

20 A. Correct.

21 Q. And I believe you already indicated that you
22 did not wear shoe covers in the garage?

23 A. No.

24 Q. Do you recall what kind of shoes you were
25 wearing the night of the 511 Seaview search?

1 A. I don't.

2 Q. Pardon?

3 A. I don't.

4 Q. Okay. Would it be the same shoes that you wore
5 when you responded to the scene on March 21st?

6 A. Very likely.

7 Q. And at any point, did you either wear a paper
8 body suit or gloves or shoe covers?

9 A. No.

10 Q. And did that include while searching the main
11 floor, you did not wear gloves?

12 A. I don't recall if I wore gloves searching the
13 main floor or not.

14 Q. Okay. You may have then?

15 A. Possible.

16 Q. Okay. And searching the garage may have been?

17 A. I don't recall.

18 Q. Did you witness any members of any law
19 enforcement team wear shoe covers during the search?

20 A. Not that I recall, no.

21 Q. I believe that there was a significant number
22 of law enforcement members from all the different
23 agencies in front of 511 Seaview prior to the SWAT team
24 entry and prior to the search.

25 Do you know why there was such a large number

1 of law enforcement there and how many were there?

2 A. No, I don't. I don't know how many were there.

3 Q. Was there a large number of law enforcement
4 present?

5 A. There was.

6 Q. Okay. And roughly, how many were there?

7 A. Prior to the warrant being executed?

8 Q. Yeah.

9 A. No, I couldn't say. I couldn't put a number on
10 it.

11 Q. 20, 30?

12 A. Maybe. Maybe 20, but again, I didn't -- I
13 wasn't paying -- yeah, I didn't count.

14 Q. And why were they all there?

15 A. In preparation for serving the search warrant.
16 I think we had called ahead to the forensics department.
17 Again, I couldn't speak to why any individual person was
18 there.

19 Can you give me just a second? My headphone
20 batteries are running out.

21 Q. Yeah.

22 A. I just want to make sure I get back.

23 Q. Why don't we take a 10-minute break? Let's
24 take a 10-minute break.

25 (The deposition was recessed from 3:20 p.m. to

1 3:32 p.m.)

2 BY MR. BRUNVAND:

3 Q. The -- another witness the other day, I think
4 it was with -- from the -- maybe it was the SWAT team
5 guy for Tarpon was saying one of the reasons why they
6 read the search warrant after SWAT has made entry is
7 because reading the search warrant would sort of
8 eliminate the element of surprise.

9 A. Sure.

10 Q. You agree with that?

11 A. Yeah. Yeah. So that is why we do that. That
12 is -- I don't know why that didn't occur to me, but,
13 yeah, we'll serve it. We'll make entry to the
14 residence, the people inside, and prevent anybody inside
15 from tampering with anything. So when it's unknown if
16 people are inside then, yeah. And if it meets a certain
17 matrix of things, you know, this being a homicide
18 investigation is why they elected to use the SWAT team.

19 Q. Okay. Was it determined at that time that it
20 was a homicide investigation, that it was a possible
21 homicide investigation? What was the status at that
22 time?

23 A. We believed it was highly likely.

24 Q. Okay. Okay. Would you agree that the element
25 of surprise, as it relates to the SWAT team and the

1 reading of the warrant, was kind of a nonissue in this
2 case as there was a large group of law enforcement
3 officers on the street in front of the house hours
4 beforehand?

5 A. It could have been, but, again, we couldn't say
6 for sure.

7 Q. Did you examine the Toyota Tundra?

8 A. I did.

9 Q. Okay. Tell me about that.

10 A. So in the bed of the truck I could see what
11 appeared to be, like, dark dried and drying liquid
12 consistent with blood.

13 Q. Okay.

14 A. Several drops of it in the middle of the bed, I
15 believe.

16 Q. Okay. Did you photograph that or did you ask
17 the forensics to photograph it?

18 A. I believe forensics photographed it, or I don't
19 recall if I took any just for myself from inside the
20 garage. I have only photos that I took myself of the
21 exterior of the truck, not of the bed itself.

22 Q. Exterior of the truck sitting in the garage?

23 A. In the garage, correct.

24 Q. Okay. All right. When you saw what you
25 believed to be a suspicious substance in the bed of the

1 truck, was the truck still sitting on the garage floor?

2 A. It was.

3 Q. Okay. And did you witness the Toyota Tundra
4 being loaded onto the tow truck?

5 A. I don't specifically recall that, no.

6 Q. Okay. Do you recall whether or not the Toyota
7 Tundra was driven out of the garage prior to being
8 loaded onto the bed of the truck?

9 A. No, I don't know.

10 Q. Okay. Do you know -- you don't know one way or
11 the other?

12 A. No, I don't.

13 Q. Do you know whether or not the Pinellas County
14 Sheriff's Office forensic tape was applied to the doors
15 and the tailgate of the truck while it was in the garage
16 or outside of the garage?

17 A. I don't know.

18 Q. Alex Spadaro was at the scene throughout the
19 search warrant?

20 A. She was.

21 Q. And what was her role?

22 A. She was -- she was just overseeing. I don't
23 know that she had a specific role. She was advising on
24 the legal aspect of the warrant.

25 Q. Okay. What specifically do you recall about

1 what she was telling you about the legal aspects of the
2 warrant?

3 A. I remember just Tarpon Springs having to
4 conduct the search and Largo acting as advisor. Beyond
5 that, I don't recall any other specific direction.

6 Q. Okay. Did Alex Spadaro give any instructions
7 on how the search was to be conducted?

8 A. None that I recall.

9 Q. Okay. Are there any other notes or anything
10 else that would assist you in recalling that?

11 A. No.

12 Q. Was Spadaro inside the residence at
13 511 Seaview?

14 A. I believe she was.

15 Q. Okay. Do you remember seeing her inside the
16 residence?

17 A. I believe so, yeah.

18 Q. Okay. On the second floor and on the garage
19 level?

20 A. Yes, I believe so.

21 Q. Did you see her physically participate in the
22 search?

23 A. No.

24 Q. I think you communicated that Tarpon Springs
25 maintained the inventory of everything that was seized

1 from 511 Seaview that night?

2 A. That, and the sheriff's office forensics unit.

3 Q. Okay. So are there two separate lists, one
4 from the forensic unit and one from Tarpon?

5 A. Yes. I was provided with a list from both.

6 Q. Okay. And as far as the items that were seized
7 by Tarpon, could you go through those items?

8 A. Sure. You want me to read them all off?

9 Q. Let me see. Do I have it in the report that
10 you sent me today?

11 A. It would be, that list is what I used for the
12 warrant return.

13 Q. Okay. If I could put my fingers on that, I
14 could just look at it and make it a little bit easier.

15 So there's a property list in this report on
16 the one that I got today.

17 A. Okay.

18 Q. And the starts out on page 1. It looks like it
19 has recordings that were obtained. I'm trying to figure
20 out, is there a list there of the things that were taken
21 from -- during the search?

22 A. So that property list on the Largo report is
23 not going to -- that's going to be just items submitted
24 and entered through our record management.

25 Q. Right. Let me see if I can pull it up.

1 A. The list I got is more likely submitted as an
2 attachment.

3 Q. Yeah.

4 A. Whereas at least saved as Word -- I just
5 attached that Word document to the warrant return.

6 Q. Does it have, like, Tarpon on there, or no?

7 A. The list he provided me is just a Word
8 document.

9 Q. I'm having a hard time finding it right now.
10 Let's just go through them. Is there a ton of them, or
11 how many items are we talking about?

12 A. This doesn't number it, but the sheriff's
13 office very well reflects it's about 50 items. I think
14 Tarpon is just physical items and not swabs collected.
15 Not swabs or anything -- not anything the sheriff's
16 office would have generated themselves.

17 Q. Okay. Let's go through the Tarpon one, just
18 the physical items that were collected.

19 A. Okay. So the gray Toyota Tundra.

20 Q. Okay.

21 A. Florida tag 70ANQU, a Michigan trailer tag, New
22 Mexico license plate, second New Mexico license plate,
23 third New Mexico license plate, Florida license plate,
24 another Florida license plate, a Vermont license plate,
25 two New Hampshire license plates, a New Hampshire

1 motorcycle license plate, a Vermont motorcycle license
2 plate, a hairbrush from southwest bathroom drawer, two
3 toothbrushes from southwest bathroom drawer.

4 Q. Let me -- let me stop you for a second.

5 So the license plates, what was the
6 significance of the license plates?

7 A. So the license plates, the license plates were
8 taken because we had seen the Toyota Tundra with a New
9 Jersey tag and followed it to the residence. When we
10 found the truck next, it now had a Florida license plate
11 on it. So it was uncertain what, you know, are these
12 tags being switched? Are they -- you know, is this --
13 because it's going to be something we need to look at in
14 the future. Is this going to be something that is
15 evidence of something that's already happened?

16 Q. Was there a New Jersey license plate included,
17 or no?

18 A. No.

19 Q. Okay. All right. And then you had indicated
20 the hairbrush and a toothbrush.

21 A. Correct.

22 Q. What was the significance of those two items?

23 A. We didn't know if or when we would come in
24 contact with Mr. Kosowski again, so I believe those were
25 taken for the purpose of generating a DNA profile.

1 Q. Okay. Did you have information or were you
2 under belief that he was leaving the area? Did you have
3 anything to suggest that at that time or you just didn't
4 know?

5 A. Other than the license plate reader indicating
6 that his Toyota Corolla was in the area of Tamiami
7 Trail.

8 Q. Okay. All right. Did you at that point know
9 if he actually had employment in Miami?

10 A. No, I don't believe I did.

11 Q. Okay. All right. What's the next item on the
12 list?

13 A. There was a towel from the dryer in the laundry
14 room, a light blue or a blue Levi's shirt in the dryer,
15 a pair of black shorts in the dryer, a pair of gray
16 underwear, a pair of white socks, all from the dryer.

17 Q. The items from the dryer, what was the
18 significance of those items?

19 A. It was a single outfit and the blue T-shirt
20 that we saw in the -- the blue T-shirt that we saw in
21 the surveillance footage, we believed it was possible or
22 at the very least resembled -- resembled the blue
23 T-shirt we'd already seen.

24 Q. Okay. All right. Go ahead. And what's the
25 next item?

1 A. Oh. Black backpack from the southeast bedroom,
2 a laptop with a black case and charger from the
3 southwest room -- southwest -- looks like a southwest
4 office off of the southwest bedroom, so as to the
5 backpack.

6 Q. Significance of the backpack?

7 A. The black backpack was what we saw the unknown
8 individual in the surveillance footage at 1501 wearing
9 into the building while he was carrying a large box on
10 his shoulder.

11 Q. What you saw or what we believe we saw?

12 A. What we believed we saw.

13 Q. Okay.

14 A. It was consistent with what we had seen.

15 Q. Okay. Yeah. You're not suggesting that it's
16 the same backpack?

17 A. Correct. I don't know that it's the same
18 backpack.

19 Q. Okay. And then the laptop, what's the
20 significance of the laptop?

21 A. The laptop, any devices that could be used for
22 the research and communication, anything that could have
23 held information related to the whereabouts of Cozzi and
24 the events surrounding it.

25 Q. Okay. What's the next item?

1 A. A Beretta 9mm semi-auto with a silencer.

2 Q. Okay. I think we discussed that earlier as to
3 why that was significant.

4 A. Correct.

5 And then magazine and rounds. And then a
6 chambered round is listed as separate. And an unknown
7 make, unknown caliber, model name PF940C semi-auto black
8 pistol from the black backpack in the southeast bedroom.

9 Q. Why was that one significant?

10 A. It was in the black backpack.

11 Q. Okay.

12 A. We didn't know if, you know, it was used.

13 Q. Let me see.

14 A. No make for the magazine and the rounds from
15 that firearm, and then unknown make, unknown caliber
16 PF940V22.

17 Q. What's that?

18 A. Semi-auto pistol.

19 Q. Okay.

20 A. That was in the black backpack in the southeast
21 bedroom, and then the magazine and the rounds that that
22 contained. And then another unknown make, unknown
23 caliber PF940SC semi-automatic pistol. That was also in
24 the black backpack, the magazine and the rounds from
25 that. And then a marble-colored -- marble-colored

1 handled switchblade knife that was in the black
2 backpack. Secure Ex --

3 Q. What was -- what was the significance of the
4 knife?

5 A. Again, it was contained in the black backpack,
6 and we didn't know if it was possibly used in the
7 incident at 1501 --

8 Q. Okay.

9 A. -- Belcher.

10 And then the Secure Ex bronze-colored knife,
11 also in the black backpack, and then there were -- there
12 was a pair of black gloves from the black backpack in
13 the southeast bedroom.

14 Q. Is that it?

15 A. Yep. That's all I have on the list.

16 And then from the sheriff's office list, they
17 list -- they list photos and swabs that they took --

18 Q. Okay.

19 A. -- but no additional property.

20 Q. All right. I don't need to go through the
21 photo and swabs. We've already done that, and we will
22 be doing that with the detectives.

23 Okay. One moment here.

24 And did you arrive at a conclusion that you
25 thought there was probable cause to search the Corolla?

1 A. So once we go through the house and we note
2 that there is blood in the trunk, or the bed of the
3 pickup truck, and there's blood on the floor of the
4 garage, and Kosowski's red Corolla is seen leaving his
5 residence, we don't find -- you know, we don't find any
6 other -- we don't find the body of Steven Cozzi, we
7 don't find any indication that he was alive there, that
8 we didn't believe he was alive at the time, but that
9 becomes the next location that most logically makes
10 sense to us.

11 Q. When is that? Is that on March 23rd or March
12 24th?

13 A. So on March 24th is when we concluded the
14 search, you know. And then once we compile the facts
15 and everything we know up to this point, that becomes
16 the next likely location where there's any evidence of
17 Steven Cozzi.

18 Q. Okay. And so based on that information, what
19 do you do?

20 A. So based on that, I requested from our dispatch
21 that they enter an alert for Kosowski's Corolla into
22 NCIC/FCIC law enforcement databases. We issued -- we
23 issued BOLOs with the intent of any agency coming in
24 contact with the vehicle to hold and notify us. And we
25 disseminated those through several different sources to

1 counties south of us, or at least we knew where the
2 vehicle traveled to.

3 Q. Okay. Is this the BOLO that clearly indicates
4 that there is -- you don't believe that there is
5 probable cause to arrest him, so do not arrest? Is that
6 the same BOLO we're talking about?

7 A. Yes, I believe so.

8 Q. Okay. You indicated in some of the affidavits
9 that when the Corolla is seen in the surveillance
10 videos, it does not appear to be weighed down?

11 A. Correct.

12 Q. There's no sagging over the rear axle. Why was
13 that significant?

14 A. I believed at the time that -- that it might
15 indicate that Steven Cozzi wasn't there or that there
16 wasn't at least a significant load being carried by the
17 Corolla.

18 Q. Okay.

19 A. But, you know, like, considering his weight of
20 only 190 pounds, I don't know what it would take -- I
21 don't know what it could take to cause the rear end of a
22 Toyota Corolla to sag.

23 Q. Okay. Okay. In the surveillance video of the
24 Corolla leaving or departing from 511 Seaview or
25 departing from the direction of where the 5112 Seaview

1 is, are you able to positively identify the driver from
2 the video?

3 A. No.

4 Q. The seizure of the Toyota truck, could you
5 describe the reasons why you believe that it was
6 appropriate to seize and take the truck into evidence?

7 A. The truck was the only thing seen leaving
8 1501 South Belcher with an item large enough to carry a
9 human body, and that we did believe carried a human
10 body, and the fact that it was used, the fact that was
11 used in that and we could follow to Dr. Kosowski's house
12 within a reasonable time frame that it takes to get from
13 that area of Belcher to Tarpon Springs, I mean, we
14 believed it was used to transport Cozzi's body.

15 Q. Okay. And, again, at no point during any of
16 the surveillance videos leading up to the seizure of the
17 Toyota truck are you able to identify the driver of the
18 truck?

19 A. Correct.

20 Q. While at some point there's information that
21 the truck has a New Jersey tag?

22 A. Correct. That was found on the Flock photo at
23 Klosterman.

24 Q. At Klosterman. Okay.

25 Other than seeing it on the Flock photo at

1 Klosterman, is there any other images, digital images
2 that show a New Jersey tag?

3 A. None that I'm aware of. There was footage from
4 a March 14th incident.

5 Q. I'm talking about on the 21st.

6 A. On the 21st. No, no other images that I'm
7 aware of.

8 Q. Okay. So, basically, Klosterman and what?
9 What was the intersection?

10 A. That is at Klosterman just west of Alt 19.

11 Q. Okay.

12 A. And I'm trying to remember what the -- I'm
13 trying to remember what the road is up there.

14 Q. Several miles, though, from Dr. Kosowski's
15 house?

16 A. Correct. Yeah. It's just west of the Pinellas
17 Trail.

18 Q. Okay. Do you know how many miles specifically
19 from Dr. Kosowski's house?

20 A. Not off the top of my head, no.

21 Q. A decent distance?

22 A. Yeah.

23 Q. In light of the fact that you had been advised
24 that the search was to be conducted by Tarpon Springs,
25 and knowing that potentially this was a very significant

1 case, did you guys discuss, you know, wearing the body
2 cam cameras so that it would show, you know, who did
3 what during the search?

4 A. I don't recall discussing that specifically.

5 Q. Okay. Would you agree that if you guys had
6 those cameras on, we could see exactly what was
7 happening during the search?

8 A. That's correct.

9 Q. Okay. And I believe there was no body-worn
10 cameras worn during the search. Is that accurate?

11 A. None that I'm aware of.

12 Q. Both for Largo and Tarpon Springs?

13 A. I couldn't say that for sure.

14 Q. Well, as the lead detective, you haven't seen
15 any of those type of images?

16 A. Right. Correct.

17 Q. So the search warrant for the Corolla, when was
18 that created?

19 A. That's -- I believe Detective Hunt began
20 drafting that on the 25th.

21 Q. Okay. Are you able to tell at what time?

22 A. I'm not. I don't have a record of what time he
23 began writing that.

24 Q. Okay. Can you tell when it was uploaded?

25 A. I can check, but I don't know if I can see

1 his --

2 Q. Okay.

3 A. -- his specific upload times.

4 No, I'm not.

5 Q. You're not able to access it?

6 A. No, I'm not seeing it.

7 Q. How many BOLOs were prepared and issued in this
8 case?

9 A. I know of an officer safety BOLO. I have four
10 from different points in time.

11 Q. Okay. I'm going to show you -- I thought there
12 was only three. Let me take a look here.

13 So can you see this?

14 A. Yep.

15 Q. Okay. So this is an officer safety BOLO;
16 right?

17 A. Correct.

18 Q. And it indicates, "Do not stop based on this
19 BOLO. There's no PC for his arrest at this time."

20 When was this prepared and issued?

21 A. I don't know exactly when.

22 Q. Would you have emailed this to someone so that
23 you can maybe determine the --

24 A. I didn't create that BOLO.

25 Q. Okay.

1 A. And I don't recall exactly who did.

2 Q. Okay. Can you find out who did? Do you know,
3 is that the first BOLO that's issued, or is that a
4 later -- let me show you two other BOLOs that I have --
5 the three that I have.

6 A. Okay.

7 Q. So this is the BOLO of the truck; right?

8 A. Yep.

9 Q. And the images that are taken, some of them at
10 least from the bus, I think?

11 A. Yes.

12 Q. Okay. And did you prepare this BOLO?

13 A. I did not.

14 Q. Do you know when it was prepared?

15 A. That was prepared on March 22nd.

16 Q. Okay. And then there is the tip BOLO?

17 A. Yes.

18 Q. And when was this -- this appears this was
19 prepared after Tom Kosowski had been arrested?

20 A. Correct.

21 Q. Okay. So you think there is a fourth BOLO?

22 A. No. I just looked. I have two. I just have
23 in the file of BOLOs, I have two copies of the one with
24 the Toyota Tundra, so I only have three.

25 Q. So there's only three?

1 A. Yep.

2 Q. The three that we just looked at?

3 So the officer safety BOLO, you said you don't
4 know when it was created?

5 A. I'm looking for the email.

6 Q. Okay.

7 A. So that was sent on the 24th at 4:44 p.m. by
8 Detective Allred.

9 Q. Okay. At 4:44 p.m.?

10 A. Yes.

11 Q. For the 24th?

12 A. Yes.

13 Q. And it clearly states at that time there was no
14 probable cause to arrest Kosowski?

15 A. Correct. Correct.

16 Q. When was Tom Kosowski arrested?

17 A. He was arrested on the 25th.

18 Q. Okay. And the officer safety BOLO, what's the
19 purpose of it again?

20 A. So his whereabouts were unknown. We suspect
21 that he's involved. And as much as we're looking for
22 the car, we want any officers that come across him to be
23 aware of the potential danger. I mean, the house was
24 full of firearms. It's -- you know, it's a homicide
25 investigation. So we don't want anybody walking up on

1 something not -- you know, unprepared. We didn't want
2 to take any chances of -- we didn't want to take any
3 chances regardless of where he may be.

4 Q. Okay. All right. What about the BOLO with the
5 truck? When was that disseminated and circulated?

6 A. So that was -- that was sent -- that was sent
7 on the 22nd.

8 Q. Okay.

9 A. The 22nd at about 3:40 in the afternoon.

10 Q. All right. What's the significance of where it
11 says "no PC at this time" on the BOLO?

12 A. So we didn't know who was driving. So we
13 didn't want anybody who might come in contact with the
14 vehicle to unnecessarily, you know, detain or arrest
15 somebody or try to take the investigation over or, you
16 know, kind of insert themselves in it unnecessarily.

17 Q. Okay.

18 A. We just wanted them to be aware and use
19 caution.

20 Q. Okay. And then as to the tip BOLO, where was
21 that created and when was it circulated?

22 A. So that was sent to Miami PD on the 28th at
23 about 3:00 p.m.

24 Q. Okay. I believe in your report on March 24th,
25 2023, you have an -- you state that you issued an alert

1 for the Florida tag. I think it's EMFK38, and instruct
2 that agencies encountering this vehicle to seize it and
3 notify Largo PD?

4 A. Correct.

5 Q. Isn't that inconsistent with the officer safety
6 BOLO where it says do not stop?

7 A. With that wording it would be.

8 Q. With that?

9 A. With that wording I see how it could be.

10 Q. Right.

11 I mean, that says do not stop, and then but
12 you're saying that you noted that you issued the
13 instruction to seize and notify.

14 A. I did, correct. You'd have to -- I believe it
15 was Detective Allred that sent this. So you have to ask
16 him about the wording of that.

17 Q. Which one?

18 A. The officer safety one, the one you have on
19 your screen.

20 Q. Okay. Was there ever a BOLO issued that said
21 seize the vehicle, stop, seize and notify?

22 A. I think we had a notice disseminated through
23 NCIC, and that's broadcast to different agencies' CAD
24 terminals.

25 Q. How can we get a copy of that?

1 A. The NCIC alert?

2 Q. Right. That would remain; right?

3 A. I would imagine so, yeah.

4 Q. Okay. Can you try to get a copy of that for
5 Mr. Vonderheide?

6 A. Sure.

7 Q. Okay. If you're seizing -- if you're giving
8 instructions to seize the vehicle but there's also
9 instructions not to arrest, is that -- was that part of
10 the -- what you sent out with the NCIC?

11 A. It was.

12 Q. That it included not to arrest?

13 A. Yeah. So part of the information I request be
14 disseminated stated that there was no probable cause at
15 the time for the arrest.

16 Q. Okay. Did you consider trying to call Kosowski
17 on the phone number that you had to see if he would
18 voluntarily meet up with law enforcement and provide
19 access to the vehicle?

20 A. I considered it, but ultimately decided against
21 it.

22 Q. Okay. Why?

23 A. From what we could tell to this point, it
24 appears an effort had been made to conceal what had
25 transpired in the bathroom, to conceal the whereabouts

1 of Steven Cozzi's body, and then after serving the
2 warrant, it appeared that further efforts were made to
3 conceal that, you know, so that --

4 Q. So after serving the warrant. I'm more
5 interested in information prior to serving the warrant.

6 Are you talking about serving the warrant on
7 the house?

8 A. The warrant on the house, correct. Correct.

9 Q. Okay.

10 A. So after seeing all these efforts to conceal
11 exactly what had happened and what had transpired, you
12 know -- we don't know what he knows. We don't know what
13 he's done. It appears there's already been efforts made
14 to tamper with or conceal what's actually going on. And
15 I didn't think a phone call would be -- you know, a
16 phone call, like, just cordially asking was going to
17 generate a worthwhile response or ultimately help locate
18 Cozzi.

19 Q. Okay. And did you discuss that with your
20 fellow detectives?

21 A. I would imagine I did. I don't recall a
22 specific conversation, though.

23 Q. Okay. Could that have been a topic of the
24 group text conversation as well, or...

25 A. We met in person quite a few times to discuss

1 the bigger aspect on the case.

2 Q. Okay.

3 A. I can't -- I don't think that would be
4 something that would have been a passing conversation.

5 Q. Okay. All right. So you think that you had a
6 meeting about it?

7 A. I do. I just -- I wouldn't know exactly when
8 or where at what point.

9 Q. There might be a message saying, hey, let's all
10 get together and discuss the latest development, that
11 type of stuff, or do I call, do I not call?

12 A. Yeah. I mean, we were communicating with the
13 purpose of coordinating with each other and meeting in
14 person for a lot of the information. So, I mean, a lot
15 of this was really fluid, and I don't really recall,
16 like, where we were or where we met and discussed what
17 in particular.

18 Q. Sure.

19 Everything is moving fast and everything is
20 fluid; right?

21 A. Correct.

22 Q. Yeah.

23 But it seems more and more these days texting
24 becomes a really essential part of communication whether
25 it's at work or at home or what have you?

1 A. It can be.

2 Q. Yeah. Okay.

3 So if the message is, seize, stop and seize the
4 Corolla but you can't arrest Kosowski, would he be free
5 to leave, then, if he's stopped?

6 A. It was dependent. I mean, he was -- if he's
7 out of the county -- he's out of the county, again,
8 these were -- this was more along the lines of officer
9 safety.

10 Q. If there's probable cause, does it matter if
11 he's out of the county or not?

12 A. If there's probable cause, but we can't arrest
13 out of the county without a warrant.

14 Q. Can another law enforcement agency in their
15 jurisdiction arrest if you say I have probable cause?

16 A. Not for a crime that didn't occur in their
17 jurisdiction.

18 Q. Okay. So it can't --

19 A. Yeah. So if it's Miami, they couldn't arrest
20 without a warrant for a crime occurring in Pinellas.

21 Q. Okay. All right. But basically you're saying,
22 I don't have probable cause at this point --

23 A. Right.

24 Q. -- arrest him; right?

25 A. Correct.

1 Q. Okay. And why would you even have to say that
2 if they can't arrest anyways?

3 A. We didn't want it to hinder the investigation
4 or we didn't -- we wanted to prevent or get ahead of --
5 get ahead of a bad arrest.

6 Q. Okay. All right. And so do you know what
7 happened in the different jurisdiction if he's pulled
8 over and they seize the car? Would he be free to leave?

9 A. I can't speak to another jurisdiction.

10 Q. What would you tell the other jurisdiction?

11 A. We'd be in constant communication. I would
12 imagine we'd contact our State Attorney immediately, you
13 know, and start working with --

14 Q. Detain him as long as you can while we're
15 trying to get --

16 A. I would imagine so, yeah.

17 Q. But at that point, you don't actually have --
18 you don't have PC, so there's -- until you have PC, it
19 doesn't do you any good.

20 A. So under reasonable suspicion, we can detain
21 until we can either confirm or dispel the suspicion of
22 the crime.

23 Q. Okay.

24 A. You know, and ultimately we're going to be
25 forced into making a decision.

1 Q. And how long can you detain based on reasonable
2 suspicion?

3 A. There's no bright-line rule as long as it -- I
4 mean, as long as it either takes to confirm or dispel
5 that suspicion.

6 Q. I mean, can you do it for days?

7 A. We wouldn't do it for days. I don't know of it
8 happening for days.

9 Q. Okay. Hours?

10 A. For hours is possible.

11 Q. Like ten hours?

12 A. That's possible.

13 Q. Pushing it?

14 A. I don't -- again, I don't really have a frame
15 of reference for what pushing it would be.

16 Q. Okay. Well, what's the -- prior to this case,
17 what's the longest that you've detained someone where
18 you didn't have probable cause?

19 A. I don't know. I've never kept a record of
20 that.

21 Q. Yeah. But would it be, say, that hours is not
22 the norm?

23 A. I would say hours is not the norm of people
24 arrested or detained. I would say it's not the norm.

25 Q. All right. So how many would you say you would

1 detain for hours, you know, without probable cause?

2 A. I couldn't put a number on that.

3 Q. Okay. Has it ever been any apart from this
4 one?

5 A. From me, personally?

6 Q. Yeah.

7 A. Not that I recall.

8 Q. Okay. The NCIC notification, is that similar
9 to a teletype or is that different?

10 A. I believe it's similar.

11 Q. Okay. What was involved in this case as far as
12 teletype is concerned?

13 A. I believe we teletyped that same broadcast
14 directly to the agencies in counties that we knew that
15 vehicle to have traveled in through license plate
16 readers.

17 Q. Okay. All right. And how does it arrive via
18 teletype versus through NCIC?

19 A. I don't know. For us, on your CAD terminals,
20 at least for individual officers, they're the same
21 screen.

22 Q. So you would get a notification on your
23 screen --

24 A. Yes.

25 Q. -- saying teletype from such and such

1 jurisdiction?

2 A. I think -- I'm not sure of the technical -- the
3 technical aspect of it. I think teletypes might go
4 directly to an agency terminal. That would be their
5 dispatch. And that's either broadcast or disseminated
6 somehow. Could be very different depending on agencies.

7 Q. And then NCIC just goes nationwide?

8 A. Correct, NCIC does.

9 Q. Okay. And FCIC? Was it NCIC or FCIC that you
10 did the --

11 A. They're always done in tandem.

12 Q. Both of them?

13 A. Yes.

14 Q. Okay. You indicated that Detective Melton
15 brought you an inventory of what the seized items from
16 511 search warrant. Is that the later in the day on the
17 24th?

18 A. I believe so, yes.

19 Q. Okay. That's in addition to the list that was
20 tagged to the door?

21 A. Those items in addition to?

22 Q. The same list.

23 A. Oh. I believe it was the same list that was
24 attached to the door, correct.

25 Q. Okay. But it was a copy of them, basically?

1 A. Yes.

2 Q. Okay.

3 A. And I'm not entirely sure what we affixed to
4 the door, if it was both of those lists. The one that
5 you provided me and the sheriff's office forensics list,
6 I'm not sure if he did both or...

7 Q. Okay. And your recollection of the one that
8 was attached to the door, it was as you guys were
9 leaving the morning of March 24th?

10 A. I don't know what list was affixed to the
11 residence. I wasn't there for that.

12 Q. Okay. I thought you were there for that. So
13 you don't know anything that was left affixed to the
14 door at the residence?

15 A. I don't know. I know I discussed with him and
16 discussed that he was going to go to the residence.

17 Q. Okay. So -- and leave the list on the door?

18 A. Correct.

19 Q. Whether or not he did it, you don't know?

20 A. Correct.

21 Q. What's the contact on March 24th with the alert
22 on March 24th reference, Chris Reynolds, an attorney
23 that Steven Cozzi previously interacted with?

24 A. So I had gotten a phone call from a lady who
25 identified herself as Barbara Kirk, and told me that she

1 was Steven Cozzi's aunt. She just wanted to provide me
2 information that she believed was valuable.

3 She stated that Kosowski had called her two
4 weeks prior and asked her about an attorney that he
5 referred to her for a car accident several years prior.
6 He asked her if she had gotten the money from that
7 settlement from that attorney. She told him she had.
8 And she learned that attorney had been arrested, so she
9 didn't know if they were connected. She just wanted to
10 pass along the information.

11 Q. Did you follow up on any of that?

12 A. So I did. In researching Chris Reynolds, I
13 found that he had been arrested on February 27th of
14 2023, and had been incarcerated at the time.

15 Q. What was he arrested for?

16 A. I don't recall specifically.

17 Q. In what county?

18 A. I believe it was Pinellas.

19 Q. Pinellas?

20 MR. BRUNVAND: Guys, I think this might be a
21 good place to break. It's 4:36. Are you okay with
22 breaking now? And then I'm guessing I got, like,
23 another 14 pages. So we started -- I don't think
24 it's going to take as long. I would imagine maybe
25 another two or three hours. Are you good to break,

1 Nathan?

2 MR. VONDERHEIDE: I'm fine with it, yeah, as
3 long as --

4 THE WITNESS: I'm good with it.

5 (At 4:36 p.m., no further questions were
6 propounded to this witness.)

ERRATA SHEET

IN RE: STATE OF FLORIDA vs. TOMASZ KOSOWSKI
DEPOSITION OF: DETECTIVE COLIN BOLTON
TAKEN: 06/12/2024

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE

Please sign, date, and return this sheet to our office.
If additional lines are required for corrections,
attach additional sheets.

At the time of the reading and signing of the
deposition the following changes were noted:

Page	LINE	CORRECTION	REASON
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Under penalty of perjury, I declare that I have read my
deposition and that it is true and correct subject to
any changes in form or substance entered here.

SIGNATURE OF DEPONENT: _____

DATE: _____

CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF PINELLAS

I, Lori A. Seiden, RPR, FPR-C, Notary Public,
State of Florida, certify that DETECTIVE COLIN BOLTON
virtually appeared before me on the 12th day of
June, 2024, and was duly sworn.

WITNESS my hand this 5th day of January, 2025.

Lori A. Seiden



Lori A. Seiden, RPR, FPR-C
Notary Public - State of Florida
My Commission No.: HH 226917
My Commission Expires: June 6, 2026

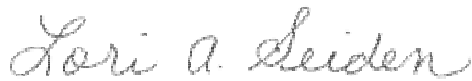
1 CERTIFICATE OF REPORTER

2
3 STATE OF FLORIDA
4 COUNTY OF PINELLAS
5

6 I, Lori A. Seiden, RPR, FPR-C, do hereby certify
7 that I was authorized to and did stenographically
8 report the foregoing deposition of DETECTIVE COLIN
9 BOLTON; that a review of the transcript was requested;
10 and that the foregoing transcript is a true and
11 complete record of my stenographic notes.

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

17
18 Dated this 5th day of January, 2025.

19
20 

21 _____
22 Lori A. Seiden, RPR, FPR-C
23
24
25

January 6, 2025

DETECTIVE COLIN BOLTON
Largo Police Department
201 Highland Avenue
Largo, Florida 33770

Dear Detective Bolton:

Your deposition taken in the case of State of
Florida vs. Tomasz Kosowski on June 12, 2024, 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 February 5,
2025.

Please call (863) 682-8737 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,



Lori A. Seiden, RPR, FPR-C