

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

STATE OF FLORIDA,

Plaintiff,

vs.

Case No.: 2023-02935-CF

TOMASZ KOSOWSKI,

Defendant.

_____/

VIRTUAL DEPOSITION OF DAVID EARLY

DATE TAKEN: MARCH 7, 2024

TIME: 4:01 p.m. - 4:06 p.m.

Examination of the witness taken virtually before:

Tammy Kelley

Verbatim Court Reporting, Inc.
728 S. New York Avenue, Lakeland, FL 33815 863-500-3603

APPEARANCES

Counsel for the Plaintiff:

NATHAN VONDERHEIDE, Esquire
ALEXANDRA SPADARO, Esquire
Office of State Attorney
Post Office Box 17500
Clearwater, Florida 33762-0500

Counsel for the Defendant:

BJORN BRUNVAND, Esquire
Brunvand & Wise, P.A.
615 Turner Street
Clearwater, Florida 33756

I N D E X
MARCH 7, 2024

WITNESS

Called by the Defendant:

DAVID EARLY

DIRECT EXAMINATION BY MR. BRUNVAND..... 4

CERTIFICATE OF OATH..... 8

CERTIFICATE OF REPORTER..... 9

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

6 THE WITNESS: Yes, I do.

7 DAVID EARLY, called as a witness by the
8 Defendant, having been virtually duly sworn,
9 testified as follows:

10 DIRECT EXAMINATION

11 BY MR. BRUNVAND:

12 Q All righty. My name is Bjorn Brunvand.
13 Along with Willengy Ramos Wicks, we represent Tomasz
14 Kosowski. Also present for the deposition is Assistant
15 State Attorney Vonderheide and Spadaro.

16 If you could please state your full name.

17 A Full name is David Renard Early.

18 Q And how are you employed?

19 A Police officer for the Largo Police
20 Department.

21 Q And how long have you been so employed?

22 A Been with the police department since 2019.

23 Q Any prior law enforcement prior to Largo?

24 A No, sir.

25 Q All right. Did you prepare a report or

1 reports detailing your involvement in this case?

2 A I did, yes.

3 Q And is that a one-page supplement?

4 A Yes, sir.

5 Q Are there any other reports other than that
6 one-page supplement?

7 A No, sir.

8 Q All right. And it appears from reading it
9 that on March 21st you were dispatched to 1501 South
10 Belcher Road Unit 6B reference a welfare check?

11 A Correct.

12 Q And what was the time that you, that you
13 arrived at that location?

14 A The time that I actually arrived I'm not
15 sure. But I do remember taking over the crime scene
16 log at 2200 hours or 10:10 from the previous officer.

17 Q Okay. So you might have arrived earlier than
18 that?

19 A Yes, sir.

20 Q How much earlier?

21 A I'd say maybe a few minutes. I'm not sure of
22 a specific time.

23 Q Shortly before 2210?

24 A Yes, sir.

25 Q Okay. And what, if anything, was happening

1 at the crime scene when you arrived shortly before 2210
2 hours?

3 A When I arrived in there, there were multiple
4 people coming in and out of the crime scene, looked
5 like crime scene techs. And that's all I could really
6 see from my position from pulling up and where I
7 initially stood until I was relieved.

8 Q And what were you doing as far as the crime
9 scene is concerned? Were you logging people in and
10 out?

11 A Yes, sir. Anybody who may have -- who was
12 leaving for the final time, they would have been logged
13 out or anybody coming on for the first time would have
14 been logged in, yes, sir.

15 Q Okay, all right. Anything else that you did?

16 A No, sir. That was the extent of my
17 involvement.

18 Q And it looks like you were there basically
19 for about an hour-and-a-half?

20 A Yes, sir.

21 MR. BRUNVAND: Okay, I have no other
22 questions.

23 Anyone else have any questions?

24 MS. RAMOS WICKS: I don't have any
25 questions.

1 MR. VONDERHEIDE: No questions.

2 MR. BRUNVAND: Okay. So if we transcribe
3 this, and I'm guessing we probably won't, but
4 if we do, do you want to read or waive the
5 reading of the deposition?

6 THE WITNESS: No, sir.

7 MR. BRUNVAND: You want to waive?

8 THE WITNESS: No, I don't need to read or
9 waive the deposition.

10 MR. BRUNVAND: Okay, all right. That's
11 fine. Thank you very much. You have a
12 wonderful day and we'll probably see you around
13 some other time.

14 (The deposition was concluded at 4:06
15 p.m.)
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CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF POLK)

I, the undersigned authority, certify that
DAVID EARLY, virtually appeared before me and was duly
sworn.

WITNESS my hand and official seal this 30th
day of December 2024.

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



1 REPORTER'S DEPOSITION CERTIFICATE

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

6 I, TAMMY KELLEY, certify that I was authorized to
7 and did stenographically report the virtual deposition of
8 DAVID EARLY, that a view of the transcript was not requested
9 and that the transcript is a true and complete record of my
10 stenographic notes.

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

17 DATED this 30th day of December 2024.

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20 TAMMY KELLEY
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