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: OFFICER JORGE ALAMEDA

DATE TAKEN: April 17, 2024

TIME: 11:04 a.m. to 11:09 a.m.

PLACE: Via Zoom videoconference

STENOGRAPHICALLY REPORTED BY:
Lori A. Seiden, RPR, FPR-C
Notary Public, State of Florida at Large

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

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     (Appearing via Zoom videoconference)
 2
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     - and -
 4
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 8
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8	EXHIBITS	NONE	
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- 1 The deposition of OFFICER JORGE ALAMEDA was taken
- 2 pursuant to notice by counsel for the Defendant on the
- 3 17th day of April, 2024, commencing at 11:04 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.
- 7 - - -
- 8 OFFICER JORGE ALAMEDA,
- 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. If you could, please state your full name.
- 15 A. My name is Officer Jorge Alameda with the Largo
- 16 Police Department.
- 17 Q. How long have you been with Largo Police
- 18 Department?
- 19 A. In two months will be 20 years.
- 20 Q. Any prior law enforcement prior to that?
- 21 A. Two years in corrections in Hillsborough.
- 22 Q. Okay. We're here on State of Florida vs. Tom
- 23 Kosowski. Also present are two State Attorneys, Spadaro
- 24 and Vonderheide.
- 25 Did you prepare a report detailing your

- 1 involvement in this case?
- 2 A. Yes, sir, a supplement. I have it with me.
- 3 Q. Okay. And so I have a supplement, and it's
- 4 basically one paragraph. And it starts -- it involves,
- 5 looks like, March 21st and it says, "I was dispatched to
- 6 the scene to relieve Officer Jones. I arrived at
- 7 1459 hours," and -- and then talks about guarding the
- 8 bathroom.
- 9 A. Correct.
- 10 Q. Okay. It indicates that you -- that you were
- informed by Officer Jones that he was preventing people
- 12 from entering the bathroom. And then it says that you
- observed a box in the front of the bathroom door. "We
- 14 later noticed a tissue with what appeared to be
- 15 blood" -- and you moved the box six inches westbound.
- 16 So towards Belcher; right?
- 17 A. Yes.
- 18 Q. -- "to get it closer to the tissue to prevent
- 19 any contact with the tissue by personnel and to prevent
- 20 the wind, if any, to blow it away."
- 21 A. Correct.
- 22 Q. And then you say, "I also observed what
- 23 appeared to be blood on the bathroom floor."
- A. The bathroom's door.
- Q. I'm sorry. Bathroom's door.

- 1 A. Correct.
- Q. And on the exterior or interior of the bathroom
- 3 door?
- 4 A. It was in the outside. I didn't enter the
- 5 bathroom.
- 6 Q. Okay. And then you were relieved from that
- 7 post at 1910 hours?
- 8 A. Yes, sir.
- 9 Q. Okay. So you were there for --
- 10 A. Scene security, make sure nobody messed with
- 11 scene.
- 12 Q. Right. So I'm just looking at the times. So
- 13 you start right before 3:00 and you go to 7:00. So
- 14 that's about four hours, a little bit over four hours?
- 15 A. Yes, sir.
- 16 Q. Okay. And did you keep a log of who entered
- 17 the bathroom during the time that you were there?
- 18 A. I don't remember if anybody entered the
- 19 bathroom.
- 20 Q. Okay.
- 21 A. Otherwise, no, I don't remember. I don't think
- 22 anybody entered the bathroom, but I'm not sure.
- 23 Q. You don't think anybody -- okay.
- 24 A. I don't think so.
- Q. Were you wearing a body cam at the time?

- 1 A. I was wearing my body cam, but I don't know if
- 2 it was recording. I can't remember.
- 3 Q. Okay. Normally when you're guarding a -- was
- 4 this designated as a crime scene when you arrived?
- 5 A. I think so. They told me to watch the
- 6 bathroom, so I'm assuming it was.
- 7 Q. Right.
- 8 Normally when you're doing that and you're told
- 9 not to let anyone in, would you -- would you generally
- 10 note it if someone entered the bathroom?
- 11 A. Probably. There is a crime scene log. If I
- 12 have the crime scene log and somebody enters the crime
- 13 scene, I put it in the crime scene log. I don't know if
- 14 I had one.
- 15 Q. Do you have access to the crime scene log?
- 16 A. Do what?
- 17 Q. Did you have access to that?
- 18 A. If there -- if there's any. I don't know if
- 19 there was a crime scene log.
- 20 Q. Okay. I see what you're saying.
- 21 But if there was one, then you would have added
- 22 the names of anyone --
- 23 A. If I had it in my possession, yes, but
- 24 honestly, I don't remember if there was a crime scene
- 25 log initiated.

- 1 Q. Okay. What else, if anything, did you do in
- 2 this case?
- 3 A. That's it.
- 4 MR. BRUNVAND: All righty. I don't have any
- 5 other questions for you.
- I will see if the State has any questions.
- 7 MR. VONDERHEIDE: No questions.
- 8 MR. BRUNVAND: Okay. Officer, do you want to
- 9 read or waive if this is transcribed?
- 10 THE WITNESS: I'll waive.
- MR. BRUNVAND: I'm sorry?
- 12 THE WITNESS: I waive right now. I don't need
- 13 to --
- MR. BRUNVAND: Waive. Okay. Very good, thank
- 15 you so much. You have a great day.
- 16 THE WITNESS: You, too, sir. Thank you.
- 17 (At 11:09 a.m., no further questions were
- propounded to this witness.)

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1	CERTIFICATE OF OATH		
2			
3	STATE OF FLORIDA		
4	COUNTY OF PINELLAS		
5			
6	I, Lori A. Seiden, RPR, FPR-C, Notary Public,		
7	State of Florida, certify that OFFICER JORGE		
8	ALAMEDA virtually appeared before me on the 17th day of		
9	April, 2024, and was duly sworn.		
10			
11	WITNESS my hand this 26th day of Desimber 2024.		
12			
13	Lori a Leiden		
14	Lori A. Seiden, RPR, FPR-C		
15	Notary Public - State of Florida		
16	My Commission No.: HH 226917		
17	My Commission Expires: June 6, 2026		
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