

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 STEVEN ALLRED

DATE TAKEN: SEPTEMBER 11, 2023

TIME: 12:32 p.m. - 1:13 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

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I N D E X

SEPTEMBER 11, 2023

WITNESS

Called by the Defendant:

STEVEN ALLRED

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

6 THE WITNESS: I do.

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

10 DIRECT EXAMINATION

11 BY MS. RAMOS WICKS:

12 Q Good afternoon, Detective Allred. How are
13 you doing today?

14 A Good. How are you?

15 Q Good. I'm just gonna introduce myself
16 because there's quite a few people in the room. So my
17 name is Willengy Ramos Wicks. I am one of the
18 attorneys involved in this case. I'm an associate
19 attorney with Brunvand Wise P.A.

20 Also present with me on the defense side
21 is Debra Tuomey. She is one of the lead attorneys
22 on the case. She's going to be asking questions
23 after I finish asking questions. Okay?

24 A Okay.

25 Q Also present with me is Ms. Spadaro. She is

1 one of the assistant state attorneys on the case. And
2 then the lead state attorney on the case, Nathan
3 Vonderheide, is also present with us. Okay?

4 A Thank you.

5 Q No problem. And then lastly we have our
6 court reporter, Tammy, who's going to be taking down
7 everything that's being said during this deposition.
8 All right?

9 A Understood.

10 Q Awesome. So could you please state your name
11 and spell your last name for the record.

12 A Steven Allred, A-l-l-r-e-d.

13 Q All right. And, Detective Allred, where do
14 you work?

15 A City of Largo Police Department.

16 Q All right. And how long have you worked
17 there?

18 A It will be 22 years in January.

19 Q All right. And so during the 22 years that
20 you've been with Largo Police Department, what
21 positions have you held?

22 A Patrol officer, field training officer,
23 assistant team leader on the SWAT team, economic crimes
24 detective, and I'm currently assigned to the crimes
25 against persons unit.

1 Q All right. And do you have any prior
2 experience in law enforcement before Largo P.D.?

3 A No.

4 Q All right. Did you write a report or a
5 series of supplements associated with this case?

6 A I completed two supplements.

7 Q Two supplements. All right. And have you
8 had a chance to review those two supplements prior to
9 this deposition this afternoon?

10 A Yes, I have.

11 Q Are there any additions or corrections that
12 you need to make to those two supplements?

13 A No.

14 Q Are your supplements full and complete?

15 A Yes.

16 Q How did you become involved in this case?

17 A I was called out to the original scene I
18 believe by Detective Hunt if I recall.

19 Q All right. When you say the original scene,
20 is that 1501 South Belcher Road in Largo, Florida?

21 A Yeah, Mr. Cozzi's law office. I don't recall
22 the address off the top of my head.

23 Q All right. And so once you arrived at that
24 location, your report indicates that you made contact
25 with some employees that work at one of the businesses

1 that's there.

2 Does that sound familiar?

3 A Yes.

4 Q Okay. Specifically Ronati, R-o-n-a-t-i?

5 A Correct.

6 Q All right. So where is Ronati located in
7 this business or in this office complex?

8 A So if you go into the -- we'll just call it
9 the main atrium which is where the law firm is, it's
10 gonna be -- the law firm's gonna be on the east side
11 there. So it's to the left when you come in the
12 atrium. And then Ronati is opposite of that door. So
13 they're on the -- they would be on the west side of the
14 building I believe. Yes.

15 Q All right. And who did you speak with at
16 Ronati?

17 A I can read the names out of my supplement if
18 you like me to.

19 Q Sure.

20 A It's Carole Bacher, Michelle Weisensee, and
21 Stacey Schlaich.

22 Q Okay. So moving to Ms. Bacher, Celeste
23 Bacher.

24 MS. RAMOS WICKS: For the record, that's

25 B-a-c-h-e-r.

1 Q During your interview with Ms. Bacher, did
2 she describe an unknown male with a goatee in the lobby
3 of 1501 South Belcher around the time of Mr. Cozzi's
4 disappearance?

5 A I don't recall that.

6 Q So you wouldn't recall what she told you
7 about this individual?

8 A No.

9 Q All right. And you wouldn't have shared that
10 information with Detective Hunt?

11 A No. Just the information I got from her is
12 the information that's in my supplement.

13 Q Okay. And you wouldn't have shared this
14 information with Detective Bolton either?

15 A No.

16 Q Okay. You indicated that you don't recall
17 about this -- and any information about this
18 individual. Was any attempt made by you or Largo
19 Police Department to identify this unknown man?

20 A Not by me.

21 Q Okay. And, to your knowledge, was this man
22 ruled out as a suspect?

23 A I don't know.

24 Q Okay. Why didn't you include information
25 about this goatee suspect in your initial Largo Police

1 Department report?

2 A I don't recall getting that information.

3 Q Did you administer a photopack to Ms. Bacher
4 like during your interview of her?

5 A No.

6 Q And was your interview of Ms. Bacher
7 recorded?

8 A No.

9 Q So moving on to Ms. Schlaich. And, for the
10 record, that's S-c-h-l-a-i-c-h.

11 After speaking with Ms. Schlaich of
12 Ronati, did you speak with the employees of Tampa
13 Bay Veterinary Specialists?

14 A I did, yes.

15 Q All right. And who did you speak with over
16 there? Can we just have a quick listing of them.

17 A Anne Sullivan, Christina Greene, Lisa Moras,
18 and Susan Rocco.

19 Q All right. And after you spoke with these
20 individuals, did you speak with the facilities manager
21 of the building?

22 A If you're referring to Debra Henrichs, that's
23 correct.

24 Q That's right.

25 MS. RAMOS WICKS: And, for the record,

1 that's H-e-i-n-r-i-c-h-s.

2 Q Now, as to Ms. Heinrichs, she indicated to
3 you during her interview that she had seen a suspicious
4 individual inside the -- inside a room that was in the
5 building. Do you recall that?

6 A Yes.

7 Q Okay. During her interview she indicated she
8 wasn't able to get a tag on the vehicle that she
9 witnessed leave the parking lot. Correct?

10 A Correct.

11 Q All right. And did you administer a
12 photopack to Ms. Heinrichs in light of the information
13 that she provided that day?

14 A I did not.

15 Q Okay. So you didn't administer a photopack
16 with her during your initial contact with her?

17 A No.

18 Q Why not?

19 A I don't -- at the time that I made contact
20 with her I don't think we had a suspect. You have to
21 have a name in order to create a photopack.

22 Q So there was no suspect at the time that you
23 initially made contact with Ms. Heinrichs at 1501
24 Belcher, South Belcher?

25 A Yeah. That was during the initial response.

1 So I think it was later in the evening on the first day
2 that we were out there. So, no, I was not aware of a
3 suspect at that time.

4 Q Okay. And so after speaking with
5 Ms. Heinrichs, what did you do to assist with the
6 investigation? Like, what was the next thing that you
7 did?

8 A We began working on trying to collect video
9 from surrounding businesses.

10 Q Okay. So just taking one step back as far as
11 1501 South Belcher's concerned. Did you go inside the
12 bathroom that was located in the atrium of 1501 South
13 Belcher?

14 A I did not.

15 Q Okay. So you didn't have any occasion to go
16 in there before PCSO forensics processed it?

17 A No, I did not.

18 Q Did any other law enforcement personnel go in
19 the bathroom?

20 A I don't know.

21 Q Were you present during the processing of the
22 bathroom by Pinellas County Sheriff's Office forensics?

23 A On and off. I was present when they started
24 it and then the next morning I was still there when
25 they were wrapping it up.

1 Q Did the Pinellas County forensics sheriff's
2 office personnel wear shoe covers?

3 A I don't recall.

4 Q Did you see Pinellas County Sheriff's Office
5 forensic personnel go inside the bathroom without shoe
6 covers on?

7 A I don't recall.

8 Q All right. So you indicated that the next
9 thing that you did in your investigation was to
10 canvass, like, the neighboring businesses to get
11 additional surveillance footage?

12 A Correct.

13 Q Okay. One of the businesses that you went to
14 was Profusion. Do you recall that?

15 A Yes.

16 Q Okay. Your report indicates that you
17 reviewed a video at this business. Is that fair?

18 A Yes.

19 Q And your report also indicated that the
20 business was located a significant distance away from
21 1501B South Belcher. So how far away is Profusion from
22 1501B South Belcher?

23 A Does my supplement say a significant
24 distance?

25 Q Yes. You can take a look at it if you like.

1 A Okay, I'm -- maybe you can help me out. I'm
2 not seeing it in here. I'm not saying it's not there.
3 I'm just not seeing it.

4 Q All right. So it's referenced in another
5 detective's report. Did you have the occasion to
6 review the video?

7 A I did.

8 Q Okay. And so as far as the contents of the
9 video is concerned, did you see a wagon on wheels?

10 A As I recall from looking at the video, we saw
11 a vehicle that was a vehicle of interest and we saw it
12 in the parking lot. And so the video was collected and
13 then given to the lead detective, Detective Bolton, for
14 his review.

15 Q Okay. So did you see a wagon on wheels in
16 the video?

17 A I don't remember. I'd have to look at the
18 video again.

19 Q Did you see someone load this wagon onto a
20 truck?

21 A No, I wouldn't have seen anybody load it into
22 the back of a truck from that angle.

23 Q All right. And did Detective Wedin -- for
24 the record, that's W-e-d-i-n --

25 A Correct.

1 Q -- unload those videos onto a personal USB
2 flash drive and submit them as evidence?

3 A It definitely would not have been a personal
4 USB drive. It would have been something issued from
5 the City. We get USB drives as just part of our
6 equipment.

7 Q All right. So you just have USB drives that
8 are issued to you by the City that you use in the
9 course of your duties and download videos on those?

10 A Yeah. Most of us carry USB drives that are
11 issued by the City. They're given to us brand new and
12 we carry them, collect evidence, and put those thumb
13 drives into physical evidence at that point.

14 Q Your report also noted that you went to
15 collect surveillance video at Sutherland Elementary
16 School.

17 A Correct.

18 Q Your report indicates that you were not able
19 to get in contact with an employee there, Robert
20 Edwards, as of March 29th, 2023. Is that fair?

21 A Correct. However, I did receive a video from
22 someone else.

23 Q And I was gonna ask you that. So eventually
24 you did receive that video from someone else at the
25 school?

1 A Yes.

2 Q Okay. So the next day, March 23rd -- or two
3 days later, March 23rd, 2023, your report indicates
4 that you continued to assist with the investigation.

5 A Yes.

6 Q Okay. You participated in the search of
7 property surrounding 511 Seaview Drive on the afternoon
8 of March 23rd while Detectives Bolton and Hunt were
9 conducting a knock and talk. Correct?

10 A If you mean did we walk the park property
11 that's on the perimeter of that property, yes.

12 Q All right. Which detectives or law
13 enforcement personnel were involved in the walk of that
14 property?

15 A I don't remember who else was with me, but I
16 remember walking through marshland up to my waist out
17 to the water. So I was there.

18 Q And what areas did you search?

19 A I walked from the road west back to the water
20 staying on the park property.

21 Q And how did you know that you were not at 511
22 Seaview Drive property as you walked that stretch of
23 property?

24 A You can look at the property appraiser's
25 website and it shows you the property boundaries.

1 There's a pretty clear delineation between the property
2 that's at that address and then the property to the
3 north of it.

4 Q Did you search the back yard entry from the
5 north easement?

6 A No.

7 Q Did you take photos?

8 A No.

9 Q Did you witness anyone else take photos?

10 A No.

11 Q Did you look into the garage on the property?

12 A No.

13 Q Did you surveil the property at 511 Seaview
14 Drive from the back yard of Dr. Kosowski's neighbor's
15 property at 503 Seaview Drive?

16 A I did not.

17 Q Did you take any photos from this point?

18 A No.

19 Q How do you know you were not at 511 Seaview
20 Drive which is private property?

21 A Again, there's a -- if you look at the
22 property appraiser's website, it's -- I spent a lot of
23 time in the woods. I'm able to tell where I'm at in
24 wooded areas and undeveloped areas. And I was very
25 careful not to cross over on private property.

1 Q Were you wearing a body camera while you were
2 conducting surveillance?

3 A No.

4 Q Why not?

5 A It's not part of our typical protocol to wear
6 body cameras when we're about. That's uniform patrol.

7 Q Your report also mentioned that you engaged
8 in a neighborhood canvass. Which properties or
9 residents did you make contact with in order to secure
10 video surveillance?

11 A There's a property directly across the street
12 from Dr. Kosowski's. I don't have the address off the
13 top of my head. But I made contact there and the
14 resident said none of their cameras were working. The
15 doorbell cameras weren't working, the surveillance
16 cameras weren't working.

17 Q Was that the only property that you visited?

18 A The best of my recollection, yeah.

19 Q All right. So I wanted to move on to the
20 search warrant that was executed at 511 Seaview Drive.

21 Do you recall that?

22 A I recall them getting a search warrant. But
23 I was not present for that.

24 Q Okay. So let me just confirm. Did you
25 assist in the execution of the search warrant on 511

1 Seaview Drive on March 23rd, 2023?

2 A No, I did not.

3 Q And so you weren't on the premises at all
4 when the search warrant was being executed?

5 A No.

6 Q Okay. I'd like to ask you about the BOLO for
7 the red Toyota Corolla.

8 A Okay.

9 Q Are you with me?

10 A Yes.

11 Q All right. Did you compose the BOLO for the
12 red Toyota Corolla?

13 A Do you happen to have it in front of you?

14 Q No, I don't.

15 A Okay. I do recall creating a safety BOLO and
16 I don't remember whether it had the red Toyota Corolla
17 in it or not. If I was able to see it, I will be able
18 to tell you for sure if it was the one I created or
19 not. But I created an officer-safety BOLO.

20 Q And what is an officer-safety BOLO?

21 A It's information that we want to communicate
22 to other law enforcement officers in case they stop out
23 with a person of interest or a vehicle and we want
24 other officers to know that they might be out with
25 someone who could pose a safety threat.

1 Q Okay. So you're not sure specifically if
2 this BOLO was for the red Toyota Corolla, but you do
3 recall doing an officer-safety BOLO?

4 A I do. And I don't remember whether it was --
5 and I'm sorry, I just don't have the BOLO in front of
6 me and I don't remember whether at that point it was
7 for Dr. Kosowski or for the Toyota Corolla. I just
8 don't recall.

9 If you show me the BOLO, I can tell you
10 whether it's the one I made.

11 Q Okay. Were there any other BOLOs or law
12 enforcement alerts that you were aware of connected to
13 this case?

14 A Not that I'm aware of, no. Just the one I
15 created.

16 Q So as it relates to the Toyota Corolla, what
17 were the facts and circumstances that led you to
18 believe this vehicle was involved in Mr. Cozzi's
19 disappearance?

20 A I believe at the time the Toyota Corolla was
21 a vehicle of interest. Other detectives had recovered
22 surveillance video footage that showed that Toyota
23 leaving the area of Mr. Kosowski's residence after the
24 Tundra returned to the residence and that vehicle is
25 registered to Mr. Kosowski.

1 Q Who noted that that Toyota Corolla did not
2 appear to be weighed down when captured on surveillance
3 video leaving 511 Seaview Drive on March 21st, 2023?

4 A Not me.

5 Q Do you know who?

6 A No.

7 Q You didn't mention that you authored the law
8 enforcement safety BOLO that you mentioned in your
9 official Largo Police Department report. Why?

10 A No reason. I mean it's -- the BOLO's saved.
11 So it's not as though it's something that is not gonna
12 be part of the record.

13 Q Was probable cause to stop and search the
14 Toyota Corolla listed in the contents of the law
15 enforcement, like, safety BOLO that you issued?

16 A The one that -- as I recall, again without
17 looking at it -- so if I had known this was going to
18 come up, I would have brought it in here with me. I
19 apologize. As I recall, it was a safety BOLO only do
20 not stop.

21 I just -- again, I don't recall the wording.
22 But I will recognize the BOLO and whatever's in there
23 is what I wrote.

24 Q And so you mentioned just now do not stop.
25 So was there any information written in the BOLO

1 regarding detaining and arresting Dr. Kosowski?

2 A Without looking at it, I don't want to say.

3 Q What other activities relating to this case
4 were you involved in on March 24th?

5 A I don't have anything for March 24th. The
6 next note that I have is March 25th.

7 Q Okay. So moving on to March 25th. Did you
8 respond to the location of a traffic stop on West
9 Orange Street in Tarpon Springs?

10 A I did.

11 Q When did you arrive at the scene?

12 A I don't have the exact time.

13 Q What law enforcement personnel from Largo
14 Police Department were at 34 West Orange Street for the
15 search of the Toyota Corolla?

16 A I know that Detective Hunt and Detective
17 Bolton were there and several others. But I'm sure
18 that they would have been -- either created supplements
19 or been -- they captured on body camera.

20 Q Did you contact Pinellas County Sheriff's
21 Office forensics to respond to the scene?

22 A I don't remember if I called them or if
23 somebody else did. But we did call them.

24 Q Did you assist in searching the Toyota
25 Corolla?

1 A When we initially stopped out with the
2 Corolla, we did a walk around on it before we sealed it
3 back up to take it to the vehicle processing bay and
4 that was when we recovered the two phones. But nothing
5 else was recovered from the car at that time I don't
6 think. Not that I recovered.

7 Q And in saying that you did a walk-around, who
8 opened the front door of the Corolla?

9 A I believe it was open when I got there.

10 Q Who opened the trunk of the Corolla?

11 A I don't recall.

12 Q Who found the two cell phones?

13 A That would be me.

14 Q Did you search the trunk of the Toyota
15 Corolla?

16 A I'm trying to remember from the scene. I
17 believe that Pinellas County forensics went into the
18 trunk. But I don't recall if we got anything out of it
19 at the time.

20 Q Did you see any blood in the trunk?

21 A At the time in plain view, no.

22 Q Did you handle any of the items inside of the
23 trunk?

24 A No.

25 Q Did you witness anyone reach into the trunk

1 with an ungloved hand?

2 A No.

3 Q Did you or any Largo Police Department
4 personnel take any photos of the contents of the truck,
5 the trunk of the car?

6 A I did not.

7 Q Were you present while Pinellas County
8 Sheriff's Office forensics processed the Toyota Corolla
9 at 34 West Orange Street?

10 A Yes.

11 Q After PCSO forensics finished processing the
12 trunk at the scene, were the results that was processed
13 shared with you?

14 A I don't recall. I know we sealed the car up
15 and took it back to their vehicle bay for a thorough
16 processing.

17 Q While the Toyota Corolla was at 34 West
18 Orange Street, were you made aware of the results of
19 any presumptive blood tests that were done on the
20 vehicle?

21 A I don't remember.

22 Q Were you present while Pinellas County
23 Sheriff's Office forensics continued to process the
24 Toyota Corolla at the PCSO vehicle processing facility?

25 A Yes, I was.

1 Q Who else was present at that time?

2 A The Pinellas County Sheriff's Office forensic
3 technicians and at some point I believe Detective Wedin
4 stopped by for a few minutes just to bring some dinner.

5 Q Did any other detectives or Largo Police
6 Department personnel join later while the Toyota
7 Corolla was being processed besides Detective Wedin?

8 A Not that I recall. It was a long night.

9 Q What was the rationale for impounding the
10 Toyota Corolla?

11 A So we took it back to their vehicle
12 processing bay so that they can process it in an
13 environment, a controlled environment.

14 Q Were you made aware of any results of any
15 processing while you were all in that controlled
16 environment?

17 A Yes.

18 Q Okay. And what were those results?

19 A So that's gonna be on page seven of my
20 supplement. And it's two ballistic vests that were
21 located in the trunk. Those vests tested -- had
22 positive presumptive tests for blood.

23 The interior of the trunk of the vehicle was
24 processed and there was a positive presumptive test for
25 blood in the trunk of the vehicle. And the cargo mat

1 from the trunk of the vehicle was removed and a
2 presumptive positive test for blood on the cargo mat.

3 Q All right. So I want to ask you about the
4 two ballistic vests that were found in the trunk of the
5 vehicle. Did those ballistic vests appear new or used?

6 A They were in very good condition as I recall.

7 Q Did you observe blood on both vests?

8 A I'm sorry, what was that?

9 Q Sorry about that. Did you observe blood on
10 both vests?

11 A I recall very specifically observing blood on
12 one of them. It was pretty obvious.

13 Q Which one?

14 A I don't know. I'd have to look at the
15 photos.

16 Q Did you observe blood on the trunk cargo mat
17 of the Toyota Corolla?

18 A No. It wasn't visible to the naked eye.

19 Q Did you observe blood on the inside of the
20 trunk of the Toyota Corolla?

21 A Not visible to the naked eye.

22 Q As it relates to the back wall of the inside
23 of the trunk of the Toyota Corolla, how was the DNA on
24 that back wall identified?

25 A You'd have to talk to the DNA lab about that.

1 Q All right. And so once the Toyota Corolla
2 was processed, what was the next thing that you did to
3 assist in the investigation?

4 A After that I met your coworker and turned
5 over to \$282,150 in cash to him and then after that I
6 believe the next thing was on the 27th I reviewed a
7 jail phone call. That's the next thing you're going to
8 see in my supplement.

9 Q Okay. Once that review of the jail phone
10 call was conducted, was there anything else that you
11 did in relation to the investigation in this case?

12 A I made a phone call to the property owner
13 at -- let's see here. I've got the address in here
14 somewhere. It's a Matthew Mackle. He was the property
15 owner for the residence that Dr. Kosowski was renting
16 down in Miami. 12380 Southwest 95th Terrace.

17 Q All right. And were you present during the
18 execution of a search warrant on that property?

19 A I was not.

20 Q So you didn't have any involvement as far as
21 that property was concerned besides finding information
22 about it?

23 A No.

24 MS. RAMOS WICKS: All right, I don't have
25 any further questions at this time. I'd like

1 to pass it to Ms. Tuomey to see if she has any
2 questions.

3 DIRECT EXAMINATION

4 BY MS. TUOMEY:

5 Q Good afternoon. I just have a few questions
6 for you. Okay?

7 A Okay.

8 Q Can you tell me the specific date that
9 Dr. Kosowski was developed as a suspect?

10 A I cannot. I don't know the answer to that
11 question.

12 Q Who would know the answer to that question?

13 A Detective Bolton.

14 Q Do you know what specific information was
15 used to develop him, Dr. Kosowski, as a suspect?

16 A No. You'd have to ask Detective Bolton.

17 Q And do you have any knowledge of any other
18 individuals as potential persons of interest or
19 suspects in this homicide?

20 A I have no personal knowledge, no.

21 Q Has anyone advised you of any other potential
22 persons of interest or suspects?

23 A No.

24 Q Is that something that you would know?

25 A I'm not privy to every aspect of the

1 investigation. Detective Bolton is lead detective on
2 it. So it is possible that he has some information
3 that I wasn't privy to.

4 Q But I'm sure that you and Detective Bolton
5 along with the other detectives communicate, right,
6 about this case, you investigate it together
7 collectively?

8 A We do.

9 Q Okay. And so you're not aware of any other
10 potential suspects or people --

11 A No.

12 Q -- persons of interest?

13 A No.

14 Q You had indicated that you responded to South
15 Belcher Road Boulevard, the law office?

16 A Yes.

17 Q And was that on March 21st?

18 A Yes.

19 Q And I think you had indicated that you had
20 been at that scene for quite some time?

21 A Yes. I responded there on the 21st and left
22 the property a couple of times, left to go look for
23 surveillance video, left to search the area. We -- you
24 know, initially we had -- the first couple of hours
25 it's one of those things where we had no idea what had

1 happened. So we were going around checking dumpsters
2 behind businesses, looking for any kind of evidence.

3 So I was on and off the property quite a bit
4 for that first 18 hours that we were there.

5 Q So that's what I was looking for. So you
6 were on and off the property for approximately 18
7 hours?

8 A Well, let's see, I showed up mid afternoon
9 and I did not leave until after 7:00 a.m. the following
10 morning. So it had to be probably -- it had to be at
11 least 15 hours I would think.

12 Q And when during that timeframe was that
13 location determined to be a crime scene?

14 A Again, Detective Bolton would probably be
15 able to answer that better. But, as far as I know,
16 once they discovered how much blood was in that
17 bathroom I think that they -- we realized that
18 something not good had happened.

19 Q So then your name should be associated with
20 whatever crime scene log there was that was started by
21 another deputy or detective. Correct?

22 A So I had no occasion to go into the restroom.
23 Which means that I did not enter that restroom. And
24 once the atrium was locked off as a place of interest,
25 I didn't go back in there either. So I don't know if

1 I'm on a crime scene log. You have to check the log.

2 Q Do you know whether a crime scene log was
3 created?

4 A Yes.

5 Q And from what I'm hearing from you, the crime
6 scene log was specific to the bathroom, the male's
7 bathroom, the community bathroom in that building
8 complex?

9 A I don't know the answer to that.

10 Q You were asked specifically whether or not
11 the crime scene technicians wore booties when they were
12 in and out of the crime scene. Do you recall that line
13 of questioning?

14 A I do.

15 Q Were you also -- at any point in time within
16 that 18 hours or what have you, did you traverse the
17 outside of that building? Meaning the whole entire
18 location of that building?

19 A You talking about, like, the sidewalk, the
20 grass outside, the parking lot?

21 Q Yes.

22 A Yes.

23 Q And did you also traverse inside or go inside
24 the building as well?

25 A I did, yes.

1 Q And did you -- I think you said you did not
2 go into the men's -- the male bathroom. Is that what
3 you said?

4 A I did not.

5 Q Did you walk anywhere else inside the
6 building?

7 A The atrium, the business described as Ronati,
8 the veterinary office in the back, and I believe I made
9 a pass-through to the law firm where Mr. Cozzi worked.

10 Q All right. And did you wear booties?

11 A I did not.

12 Q Did any crime scene technicians take
13 photographs of your footwear that you were wearing on
14 that day?

15 A I don't recall.

16 Q All right. Now, you went out to 511 Seaview,
17 I think it's Road. Right?

18 A Yes. The neighborhood, yes.

19 Q And you had indicated that -- and correct me
20 if I'm wrong. But prior to going out there, you had
21 went on the property appraiser's website. Right?

22 A Yes.

23 Q And specifically in order to determine what
24 the boundary -- the boundaries for that lot are?

25 A And I don't remember whether it was me that

1 looked at it, but I remember looking specifically at
2 that lot. Because we wanted to be careful not to get
3 onto the property.

4 Q All right. Did you take a copy of the
5 property appraiser's website lot boundaries prior to
6 going out to that location?

7 A No.

8 Q What specific delineations did you use in
9 order not to overstep or trespass on this private
10 property?

11 A There's a cut that runs along the north side
12 of the property and it's, it's such that the mangroves
13 that are on the north side of the property there you
14 really can't get through those and be anywhere close to
15 the property. It's pretty, it's pretty far off the
16 property.

17 Q Okay. So what specific delineations did you
18 use to --

19 A That cut where the mangroves end.

20 Q The cut where the -- when you say cut, what
21 do you mean by that?

22 A So the mangroves have a -- they have kind of
23 a -- along the west side of the property, if I recall
24 correctly, before you get to the mangroves -- and
25 trying to remember if there was a fence there. I don't

1 remember if there was a fence on the west side of
2 the -- or on the north side of the property I mean.

3 Q Okay. So are you telling me that it's the
4 cut from the mangroves that you used?

5 A Yeah. And really, just to clarify, I was
6 walking through those mangroves which is in the park
7 property just making sure that there was no clothing
8 items or anything along those lines in the mangroves.

9 Q Okay. So a portion of those mangroves is
10 part of, is part of a park property?

11 A Yeah. There's a park on the north side there
12 and I believe it's all -- it's either all county or all
13 park property.

14 Q So it is your testimony that you used the
15 mangroves as a guide to delineate this private property
16 versus the park or public property?

17 A Yes.

18 MS. TUOMEY: Okay, thank you. Those are
19 the only questions I have for you. I don't
20 know if the State has any questions for you.
21 You are going to have to determine whether you
22 want to read or waive.

23 MR. VONDERHEIDE: I don't have any
24 questions.

25 MS. RAMOS WICKS: Detective, would you

1 like to read or waive?

2 THE WITNESS: Read.

3 (The deposition was concluded at 1:13
4 p.m.)

ERRATA SHEET

DO NOT WRITE ON TRANSCRIPT -- ENTER CHANGES HERE

IN RE: STATE OF FLORIDA VERSUS TOMASZ KOSOWSKI

DATE TAKEN: SEPTEMBER 11, 2023

REPORTER: TAMMY KELLEY

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

STEVEN ALLRED

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF POLK)

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

WITNESS my hand and official seal this 26th
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 STEVEN ALLRED, that a view of the transcript was 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 26th day of December 2024.

18 
19

20 TAMMY KELLEY
21
22
23
24
25

December 26, 2024

Mr. Steven Allred
sallred@largo.com

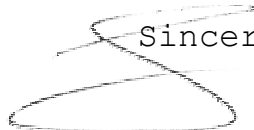
Dear Mr. Allred:

Your deposition taken in State of Florida versus Tomasz Kosowski on September 11, 2023, has been transcribed. Per your request to review the transcript, it is being held at our office at 728 South New York Avenue, Lakeland, Florida.

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

Thank you for your prompt attention to this matter.

Sincerely,

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

Tammy Kelley