

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 BRYAN BALDIE

DATE TAKEN: MARCH 7, 2024

TIME: 3:33 p.m. - 3:41 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:

BRYAN BALDIE

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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 BRYAN BALDIE, 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 Good afternoon.

13 A Do you mind if I close the door real
14 quick? Do you mind if I close the door?

15 Q No, go ahead.

16 A I'll be right back.

17 Q Good afternoon, Officer Baldie.

18 A Good afternoon.

19 Q My name is Bjorn Brunvand. Along with
20 Willengy Ramos Wicks, we represent Tomasz Kosowski.
21 Also present for the State is ASA Spadaro and
22 Vonderheide.

23 If you can please state your name.

24 A Officer Bryan Baldie, Largo Police.

25 Q And how long have you been so employed?

1 A Seventeen years now.

2 Q Okay. And what are your duties for the Largo
3 Police Department?

4 A I am a patrol officer.

5 Q Okay. And back in April of 2023, what were
6 your duties?

7 A Patrol officer.

8 Q Okay. You've been listed in -- as a witness
9 in this case. Did you prepare a report or multiple
10 reports detailing your involvement in this case?

11 A Yes, a supplement.

12 Q Okay. And is that a one-page supplement?

13 A It is.

14 Q It is detailing your involvement on April
15 1st, 2023?

16 A It does.

17 Q And does it completely and accurately
18 describe everything that you did in this case?

19 A It does.

20 Q Okay. It appears from the report that you
21 assisted in searching the Collier County landfill at
22 3740 White Lake Lane. Is that correct?

23 A That's correct.

24 Q Okay. And when did that search take place?

25 A When? It was --

1 Q Yes.

2 A -- over a few days. But I don't have the
3 specifics.

4 Q Okay. So it says you were assigned to it on
5 April 1st. Did you go down there immediately or, or
6 what?

7 A I was assigned and then we gathered our
8 equipment and then we left and did a caravan from
9 Largo to Collier County. But I don't have the
10 specifics.

11 Q Okay. And when you say we, who's we?

12 A It was myself, Officer Hanzlik, I think
13 Officer Justice, Sergeant Williams, a few others I
14 believe.

15 Q Okay. And what kind of equipment did you
16 have?

17 A Shovels, rakes, different things like
18 that.

19 Q Okay. And over how long of a time period
20 were you searching the landfill?

21 A Sun-up to sundown roughly.

22 Q Okay. Over two days?

23 A I think it was a couple of days. But I
24 really -- I didn't put that in my report, so I don't
25 have the specifics.

1 Q Okay. Couple usually means two. But could
2 it mean more than two?

3 A I'm pretty sure it was more than two. I'm
4 guessing four, but I can't say for sure.

5 Q Okay.

6 A At this point I'm guessing, you know.
7 We're not supposed to do that.

8 Q Sure. Well, you can actually guess as long
9 as you tell us you're guessing.

10 A I'm guessing.

11 Q That's okay. So you're guessing four?

12 A Yes, I'm guessing four.

13 Q Okay. And however long the search took, did
14 you find anything of evidentiary value?

15 A I did not.

16 Q Okay. Were you wearing any type of body cam
17 recording device during the time?

18 A I did not.

19 Q Okay. Do you know if anyone else wore?

20 A I don't think they did.

21 Q Okay, all right. Anything else that -- any
22 other involvement you had in this case?

23 A No, sir.

24 MR. BRUNVAND: Okay, I don't have any
25 other questions.

1 Does anyone else have any questions?

2 MS. RAMOS WICKS: No.

3 MR. VONDERHEIDE: No.

4 MS. SPADARO: No.

5 MR. BRUNVAND: Okay. Officer Baldie,

6 the -- if we were to transcribe this

7 deposition, would you like to read or waive

8 before it's finalized?

9 THE WITNESS: Normally the State answers
10 for me. Because I always get them confused.

11 MR. BRUNVAND: Okay.

12 THE WITNESS: I always say the wrong thing
13 and then I have to take it back.

14 MR. BRUNVAND: So read basically means
15 before it's finalized it's sent to you and you
16 have to read it, see if it's accurate and
17 then -- but you can then note if you disagree
18 with anything.

19 Waive basically means you don't have to.
20 You still get to read it if it's ever
21 transcribed, but you just don't have to
22 actually do it.

23 So it's up to you. You can do either.

24 Some people -- many people waive. Some people
25 read and then vice versa, so.

1 THE WITNESS: I think they say read, but I
2 never actually had that opportunity to read
3 one. So --

4 MR. BRUNVAND: All right. We'll --

5 THE WITNESS: -- why don't we read it.

6 MR. BRUNVAND: -- put it down for read and
7 the court reporter's going to ask you for some
8 information. I'll pause the recording real
9 quick.

10 (The deposition was concluded at 3:41
11 p.m.)

ERRATA SHEET

DO NOT WRITE ON TRANSCRIPT -- ENTER CHANGES HERE

IN RE: STATE OF FLORIDA VERSUS TOMASZ KOSOWSKI

DATE TAKEN: MARCH 7, 2024

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.

BRYAN BALDIE

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF POLK)

I, the undersigned authority, certify that
BRYAN BALDIE, 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



REPORTER'S DEPOSITION CERTIFICATE

STATE OF FLORIDA)

COUNTY OF POLK)

I, TAMMY KELLEY, certify that I was authorized to and did stenographically report the virtual deposition of BRYAN BALDIE, that a view of the transcript was requested and that the transcript is a true and complete record of my stenographic notes.

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

DATED this 30th day of December 2024.



TAMMY KELLEY

December 30, 2024

Mr. Bryan Baldie
bbaldie@largo.com

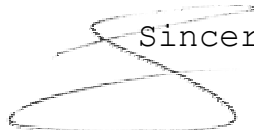
Dear Mr. Baldie:

Your deposition taken in State of Florida versus Tomasz Kosowski on March 7, 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.

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