

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

STATE OF FLORIDA,)
 Plaintiff)
)
vs.) Case No. 23-02935-CF
)
TOMASZ KOSOWSKI,)
 Defendant.)

)

DEPOSITION OF AMBER CAMACHO

DATE: Monday, July 29, 2024
TIME: 1:37 p.m.
PLACE: VIA ZOOM VIDEOCONFERENCE
REPORTER: Kathy H. Hoy
 Notary Public

1 A-P-P-E-A-R-A-N-C-E-S

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7 For the State of Florida

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12 For the Defendant
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I-N-D-E-X

July 29, 2024

DEPOSITION OF AMBER CAMACHO

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EXHIBITS

(No exhibits marked.)

DEPOSITION IN DISCOVERY

AMBER CAMACHO

PURSUANT to notice duly given, the deposition of AMBER CAMACHO, called by the Defendant in the above-entitled cause, was taken by me, a Notary Public in and for the State of Florida at Large, at the time and place and in the presence of counsel enumerated on page 1 hereof.

THEREUPON, it was stipulated and agreed, by and between the attorneys for the respective parties, by and with the consent of the said deponent, that signature to the said deposition be reserved.

THEREUPON, the following proceedings were had and taken:

COURT REPORTER: Would you raise your right hand for me please.

Do you swear or affirm that the testimony you're about to give today shall be the truth, the whole truth, and nothing but the truth?

MS. CAMACHO: I do.

COURT REPORTER: Thank you.

AMBER CAMACHO, having been duly sworn or affirmed, was examined and testified as follows:

DIRECT EXAMINATION

BY MR. BRUNVAND:

Q. My name is Bjorn Brunvand. We're here on State of Florida v. Tom Kosowski.

If you could please state your name.

A. Amber Camacho, C-A-M-A-C-H-O.

Q. And how are you employed?

A. I work for the Pinellas County Sheriff's Office.

Q. And how long have you been so employed?

A. Since 2001.

Q. So, what is that, 23 years?

A. Yes.

Q. Okay. Very good. Did you prepare a report or multiple reports detailing your involvement in this case?

A. Yes. I have one, Supplement 6.

Q. Okay. And the copy that I have is a four-page supplement with the narrative part being two pages basically or a page and a half maybe; does that sound like the same one?

A. Yes.

Q. Okay. Have you had a chance to review that for completeness and accuracy?

A. Yes, I did.

1 Q. And does it appear to be complete and
2 accurate?

3 A. Yes.

4 Q. What was your involvement in this case?

5 A. Are you okay if I refer to my report?

6 Q. Absolutely.

7 A. Okay. I responded to the business on 1501
8 South Belcher Road on March 22nd, 2023 to assist with
9 processing of fingerprints, Amido Black application, and
10 luminol processing.

11 Q. And what was the date that you arrived at that
12 location?

13 A. My arrival date is March 22nd at 8:03 a.m.

14 Q. Okay. All right.

15 A. So I believe it was like the next day maybe.

16 Q. Okay. And so tell us about what you did once
17 you arrived.

18 A. Once I arrive, I was assisting Supervisor
19 Murphy and Assistant or Specialist Hook, who were
20 already on scene processing.

21 I actually used black and magnetic powder to
22 process areas in the electrical door, the bathroom,
23 men's bathroom stall, the interior Suite B floor door,
24 and then also the interior men's bathroom stall door.

25 So I processed those with fingerprint powder.

1 Q. And you indicated in your report you received
2 positive results for ridge detail on the electrical door
3 and interior men's bathroom stall door.

4 What does that mean, you received positive results?

5 A. That means I receive ridge detail, and that
6 ridge detail gets submitted to AFIS for evaluation.

7 Q. So does the fact that you have positive
8 results, does that mean that it's suitable for further
9 examination through AFIS or --

10 A. That means it's just a ridge detail and
11 somebody else will examine it to see if it can go in the
12 AFIS system.

13 Q. Understood. Okay. Do you know or do you have
14 any notes indicating the extent of the ridge detail that
15 you obtained positive results on?

16 A. I do not.

17 Q. Is that something that you normally would
18 note?

19 A. I -- that would be something that AFIS would
20 note.

21 Q. Okay. So you don't know how many, if it was
22 one or --

23 A. Oh, I'm sorry. I received eight lifts from
24 the scene, if that's what you mean, but I don't know if
25 they were of value or if they were identified or not.

1 Q. Okay. And as far as the amount of ridge
2 detail, you don't know the extent of that.

3 A. No, I do not.

4 I just know how many lifts I lifted and then I
5 submitted to them.

6 Q. Okay. Then it says you received a lift of six
7 possible cloth patterns from the following areas, and
8 then you list the areas.

9 What is a cloth pattern?

10 A. It is the same type of pattern. It's like a
11 cross pattern that you'll see identifying it. Sometimes
12 it looks like a worker's glove or a garden glove type of
13 pattern, and that gets submitted to property and
14 evidence. It doesn't get submitted to AFIS. So we
15 would need the same type of glove or cloth pattern to be
16 identified to that lift.

17 Q. Okay. All right. And again, do you do any
18 further examinations beyond just lifting the possible
19 cloth patterns?

20 A. No, I do not.

21 Q. It then indicates that Supervisor Murphy
22 collected the p-trap and liquid from the men's bathroom
23 sink using a phenolphthalein kit. I tested the interior
24 upper portion of the p-trap and a sample of the removed
25 liquid for the presence of blood. I received negative

1 results for the presence of blood.

2 What does that mean?

3 A. That's correct. So in the men's bathroom
4 stall, in the sink area, we removed the p-trap liquid
5 and we tested that area to see if there was the presence
6 of blood, and we received negative results.

7 Q. And does that mean that there was no blood in
8 there or what does that mean?

9 A. When it was tested, we didn't find any blood.

10 Q. Okay. And this is in the morning hours of
11 March 22nd, 2023.

12 A. That's correct.

13 Q. For purposes of -- I'm going to go back to the
14 use of black and magnetic powders and that you indicated
15 that you looked for ridge detail on both the interior
16 electrical door and the exterior electrical door, but
17 then it says that you received positive results from the
18 interior of the electrical door and the interior men's
19 bathroom stall door.

20 Does that mean that the other areas that you
21 checked were negative for ridge detail?

22 A. That's correct. All other areas are presumed
23 negative.

24 Q. Were you aware at the time that Specialist
25 King had processed the electrical door for ridge detail

1 a few hours prior to you making the efforts?

2 A. Yes. There was areas that were processed on
3 the door, and I just processed additional areas on that
4 door.

5 Q. Okay. Was there a particular reason why you
6 were asked to process additional areas?

7 A. No particular reason. I just processed the
8 top to bottom.

9 Q. Was it your decision to do additional
10 processing or did someone instruct you to do it?

11 A. I don't recall, but I was there to assist
12 Supervisor Murphy.

13 Q. Okay. Would it be -- so Supervisor Murphy --
14 was Supervisor Murphy there when Specialist King
15 processed the door?

16 A. I believe that was another shift. I believe
17 Supervisor Stroke, Supervisor Clark, Supervisor Kline,
18 Briggs, another team was there prior to us. So we were
19 handing off one scene to another.

20 Q. Okay. And if I'm understanding you correctly,
21 you don't recall whether or not you yourself made the
22 decision to do the additional prints or whether or not
23 you were instructed by your supervisor to do it.

24 A. I do not recall how the direction came, but I
25 did process the entire door.

1 Q. Okay. When you say "the entire door",
2 including areas that had previously been processed or --

3 A. Not including the areas, I don't believe, no.

4 It was just the areas that were left unprocessed.

5 Q. And how do you -- how can you tell what's been
6 processed and what hasn't?

7 A. It's very obvious black dark powder.

8 Q. Okay. Okay. Do you have any knowledge about
9 any of the prints that were obtained by Specialist King
10 on the same surfaces?

11 A. At the time, no.

12 I did learn at a later date that she did make
13 identification somewhere within that room.

14 Q. Okay. Do you know if there were any issues or
15 problems with the prints that had been obtained by
16 Specialist King?

17 A. I'm not aware of any.

18 Q. Do you know whether any of the prints of value
19 that you obtained were compared and identified with
20 individuals apart from -- well, do you know whether any
21 of the prints connected to Tom Kosowski?

22 A. I'm not aware of any of the results from AFIS
23 on the ridge detail that I lifted.

24 Q. Okay. So as to Tom Kosowski or anyone else
25 that may have been identified.

1 A. Any results at all.

2 Q. Okay. And that's not part of your duties, is
3 that correct?

4 A. That's correct. We collect the items and
5 someone else analyzes them.

6 Q. Did you also assist in processing the men's
7 bathroom with luminol?

8 A. That is correct.

9 Q. And what were the results of your luminol
10 analysis?

11 A. There was positive results for luminol, and
12 those were photographed by Specialist Hook.

13 Q. Is there a positive quality control test for
14 luminol that was conducted?

15 A. That's correct. Before we apply any chemicals
16 we make sure it's properly working. So that's what that
17 little sentence is within the report.

18 Q. Okay. And could you -- what is the positive
19 quality control test that you do?

20 A. For which one? For luminol or for Amido?

21 Q. For luminol.

22 A. Luminol we actually use a penny to test it if
23 it's working properly.

24 Q. Okay. And did you, in fact, perform that
25 test?

1 A. Yes, we did.

2 Q. And what was the testing agent that you used?

3 A. For luminol or for the other --

4 Q. Luminol was the penny.

5 A. Luminol was the penny.

6 Amido Black we also have a presumptive test that we
7 do a quality control test or it is presumptive, but we
8 use blood to test if that's working properly.

9 Q. Okay. Did you recover any blood from the
10 men's bathroom?

11 A. I don't believe so. I did not collect any
12 blood.

13 Q. Did you discuss any of your forensic findings
14 with Detectives Bolton or Hunt?

15 A. I believe they were both on scene, and they
16 were aware of the findings.

17 Q. And so we talked about the ridge detail
18 findings.

19 We talked about the luminol and the photographing
20 of the areas of the luminescence which was done by
21 Specialist Hook, right?

22 A. Yes.

23 Q. The areas of luminescence, what did that mean
24 to you and if you discussed it with Detectives Bolton
25 and Hunt, what was the information that you conveyed to

1 them as it relates to luminescence?

2 A. I don't recall what was discussed. I think we
3 just discussed the results, that we received positive
4 results for luminescence. A lot of times with luminol
5 it also has a false positive with chemicals, cleanup
6 chemicals. So it can also react with that.

7 So if they want to test it further, it needs to get
8 sent to the lab.

9 Q. Okay. Did you suggest that or do you recall
10 if you had that discussion with the detectives?

11 A. I don't recall.

12 Q. Do you recall if -- well, you and members of
13 your team, did you guys wear shoe covers during your
14 time at the location where you were obtaining evidence?

15 A. Yes, we did.

16 Q. Okay. Do you recall whether or not Detective
17 Bolton and Hunt wore shoe covers during that same time
18 period?

19 A. I don't recall.

20 Q. We talked about how the luminescence sometimes
21 can appear as a result of cleaning fluids among other
22 things.

23 A. Yes.

24 Q. And that independent laboratory testing would
25 be required to confirm the presence of blood.

1 A. That's correct.

2 Q. Okay. If the independent laboratory testing
3 was done and it does not indicate the presence of blood,
4 despite there being a positive finding of the
5 luminescence, what does that tell you, if that's the
6 case?

7 A. Then there would not be any blood.

8 Q. Okay. What else, if anything, did you do in
9 this case?

10 A. And let me just refer back to what I just
11 stated.

12 Q. Okay.

13 A. Blood can be cleaned up by hydrogen peroxide.
14 So I don't know what cleaning agent was used.

15 Q. Sure.

16 A. But at the time when we applied the luminol we
17 received a luminescence. A collection was made I
18 believe by Specialist Hook, and that would have to get
19 sent off to see if it was actually -- if there was blood
20 there or not.

21 Q. Okay.

22 A. But there are other cleaning agents that will
23 cleanup blood.

24 Q. Okay. And then that may give a false
25 positive.

1 A. True.

2 Q. Okay. Anything else?

3 A. On that, no.

4 Q. Anything else that we haven't discussed?

5 A. Yes. After the luminol I was informed there
6 were two cigarette butts near where the suspect was
7 possibly parked. So I did photograph and collect those
8 cigarette butts.

9 Q. Okay. And those were preserved so that they
10 could be tested for DNA and other --

11 A. Potentially if the detective wanted to send
12 them off, yes.

13 Q. Sure. You took care to collect them in a
14 manner and save them in a manner so that further testing
15 could be done, if necessary?

16 A. That's correct.

17 Q. Okay. Anything else?

18 A. No.

19 MR. BRUNVAND: Okay. Mr. Vonderheide, do you
20 have any questions?

21 MR. VONDERHEIDE: I don't have any questions.
22 Thank you.

23 DEPONENT: Thank you.

24 MR. BRUNVAND: Thank you so much.

25 Do you want to read or waive.

DEPONENT: Read.

MR. BRUNVAND: Okay.

(The deposition was concluded at 1:58 p.m.)

ERRATA SHEET

IN RE: State vs. Kosowski

DATE TAKEN: July 29, 2024

WITNESS: Amber Camacho

Page	Line	Correction	Reason
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Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

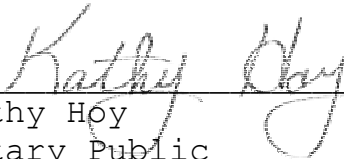
DATE	(AMBER CAMACHO)
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CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF PINELLAS)

I, the undersigned authority, certify that
AMBER CAMACHO, personally appeared before me and was
duly sworn on July 29, 2024 via Zoom Videoconference.

WITNESS my hand and official seal this 23rd day
of December, 2024.



Kathy Hoy
Notary Public
State of Florida at Large
My Commission No.: HH 578942
Expires: September 23, 2028



1 CERTIFICATE OF REPORTER

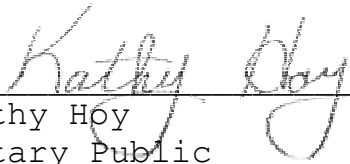
2 STATE OF FLORIDA)

3 COUNTY OF PINELLAS)

4
5 I, Kathy Hoy, Court Reporter, certify
6 that I was authorized to and did stenographically
7 report the deposition of AMBER CAMACHO; that a
8 review of the transcript was requested; and
9 that the foregoing pages are a true record and complete
10 record of my stenographic notes taken during said
11 deposition.

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

18
19 Dated this 23rd day of December, 2024.

20
21 
22 Kathy Hoy
23 Notary Public
24 State of Florida at Large
25 My Commission No.: HH 578942
Expires: September 23, 2028