

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 JENNIFER BURE

DATE TAKEN: APRIL 10, 2024

TIME: 3:06 p.m. - 4:13 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

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

APRIL 10, 2024

WITNESS

Called by the Defendant:

JENNIFER BURE

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ERRATA SHEET..... 47

CERTIFICATE OF OATH..... 48

CERTIFICATE OF REPORTER..... 49

SIGNATURE LETTER..... 50

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 swear.

7 JENNIFER BURE, 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 My name is Bjorn Brunvand. I represent
13 Tomasz Kosowski. We're here on State of Florida versus
14 Tomasz Kosowski.

15 I believe present as far as counsel now is
16 myself and then for the prosecution ASA Spadaro and
17 then Mr. Vonderheide.

18 Can you please state your name.

19 A Jennifer Bure.

20 Q And how are you employed?

21 A Through the City of Largo as a police
22 officer.

23 Q And how long have you been so employed?

24 A Since 2006 to 2016 and then again 2020 until
25 current.

1 Q Okay. What happened between 2016 and 2020?

2 A I was a law enforcement officer --

3 THE COURT REPORTER: Can you -- excuse me.

4 You said you were a law enforcement officer and
5 then it cut and then I got Illinois. So what
6 was in between that?

7 A I was going to say Chicago, but it wasn't the
8 Chicago Police Department but it's in Illinois. It was
9 Round Lake Beach Police Department.

10 THE COURT REPORTER: Thank you.

11 Q What was it? Lake Beach Police Department?

12 A Round Lake Beach.

13 Q Round Lake Beach. Okay. What about prior to
14 2006, any law enforcement during that time period?

15 A No, sir.

16 Q Okay, all right. So basically you moved from
17 Largo to Round Lake Beach in Illinois and then you
18 decided it was too cold up there and you came back to
19 Florida?

20 A My husband's in the Coast Guard. So I go
21 where he goes.

22 Q Okay, okay. Very good. Very good. Did you
23 prepare a report detailing your involvement in this
24 case?

25 A I did.

1 Q And is it just one report or multiple
2 reports?

3 A I believe there's only the initial report. I
4 don't believe I have any supplements.

5 Q So I have a narrative here that is basically
6 a little bit over a one-and-a-half-page narrative.
7 Says reporting officer Jennifer Bure. Bure is it?

8 A Bure, yep.

9 Q Yeah. And page nine and ten on the bottom.
10 Is that the same report that you have?

11 A I don't have a hand -- like, one in hand.
12 But I'm assuming that if you're looking at the first
13 narrative for this case it should be my name on it.

14 Q Okay. The one I'm looking at, the first
15 paragraph starts out, "On 3/21/23 at approximately 1146
16 hours I was dispatched to 1501 6B South Belcher Road in
17 reference to a welfare check."

18 A That's my narrative.

19 Q Okay. And then the last two sentences it
20 says, "Please refer to Detective Bolton and Detective
21 Hunt's supplements for further" and then "this case is
22 active pending further investigation."

23 A That would be mine.

24 Q Okay. Have you had an opportunity to review
25 this report prior to coming in here today?

1 A Yes, sir.

2 Q Not actually coming in because we're doing it
3 via Zoom. But since for many, many decades we were
4 coming into a room doing these things, so that's why
5 I'm still asking the question in that manner.

6 In reviewing this for accuracy and
7 completeness, does it appear to be complete and
8 accurate?

9 A Yes.

10 Q Now, when you arrived at 1501 6B South
11 Belcher Road for the welfare check, you initially met
12 with Jake Blanchard?

13 A Yes.

14 Q Was your body cam video operating when you
15 first initiated contact with him?

16 A I believe so. I have not reviewed my body
17 camera footage.

18 Q You have not reviewed it, okay.

19 A No. I just reviewed my report.

20 Q Okay, all right. The -- meaning you haven't
21 reviewed it in preparation for today or you haven't
22 reviewed it ever?

23 A I don't believe I've looked at it ever in
24 reference to this case.

25 Q Okay, all right. Would it customarily be

1 active?

2 A Yes.

3 Q Okay. On page two of your narrative towards
4 the end it says, "This investigation was captured on my
5 BWC."

6 A (Nods head affirmatively.)

7 Q Would that suggest to you that the entire --
8 entirety of this was captured or just a portion of it?

9 A I would assume that parts of it might have
10 been muted or maybe -- I don't believe I stopped the
11 camera.

12 Q Okay.

13 A I might have. Sometimes I mute it if we're
14 talking about sensitive information, or.

15 Q Okay. And so give me sort of the guidelines
16 for when you mute and when you don't and where those
17 rules come from.

18 A I don't know the specific policy that we
19 have.

20 Q Okay.

21 A I know that if I'm trying to seek advice or
22 get something from a supervisor, it might be muted at
23 that point. There's times where if I'm training
24 another officer and I'm correcting what they're doing
25 sometimes we might also mute that. Typically things

1 like that.

2 Q So mostly dialogue between yourself and
3 fellow officers about, you know, discussing what's, you
4 know, maybe strategy or things that are really internal
5 to your department it may be muted. But generally when
6 you speak with witnesses would it not be muted?

7 A Typically, yes. Sometimes -- I think we had
8 just started using these.

9 Q Right.

10 A And I was having -- I was getting --
11 sometimes the buttons, if you hold it in, I believe
12 that's what mutes it. If you push it in once, it might
13 bookmark that section.

14 And I was kind of maybe mistaking the two. I
15 know I was having trouble with that in the beginning.

16 Q Right.

17 A Even now I can't remember which one does
18 what.

19 So it's possible that it could have been
20 muted during the entirety of the call.

21 Q Okay.

22 A Or a portion of it.

23 Q Yeah, I don't believe it was muted during the
24 entirety of the call.

25 A I mean during portions of the entire call.

1 Q Sure. Sure, sure. Where did you meet
2 Mr. Blanchard when you first arrived?

3 A I believe I met him outside the building.

4 Q Okay.

5 A The office building.

6 Q All right. Are you familiar with the main
7 entrance to where his office is?

8 A Yes.

9 Q And there's, like, a John Lennon painting on
10 the wall in the lobby. Maybe you don't know.

11 A I don't recall specifically what painting it
12 had on it.

13 Q Okay. Do you remember there was a big, big,
14 like, painting on the wall?

15 A Yes.

16 Q Right. That lobby -- would it be right
17 outside of that lobby or would it be out by the street?

18 A I know that I met the victim's husband
19 outside from what I can recall. Or I at least spoke to
20 him on the sidewalk outside the building.

21 Whether I met Mr. Blanchard in the lobby or
22 in his specific office, the main area or on the
23 sidewalk, I don't recall where.

24 Q All right. Looking at your report it appears
25 that -- and, by the way, you can reference your report

1 anytime if you have the need.

2 A Okay.

3 Q It appears that you first speak with
4 Mr. Blanchard. Does that seem accurate?

5 A Yes.

6 Q Okay. And he provides you with information
7 about his concern. Right?

8 A Yes.

9 Q And you indicate, "Blanchard was visibly
10 upset, walked me into Cozzi's office." Is that
11 happening almost immediately or is that after a period
12 of time?

13 A I believe it probably would have been after a
14 few moments or minutes. The way that the office was
15 set up was the main lobby that you spoke of earlier and
16 then to the left or I believe the east it would have
17 been the law offices with several separate offices
18 within that --

19 Q Right.

20 A -- business.

21 I spoke with him I believe in the main
22 hallway of their business and then he would have taken
23 me into Mr. Cozzi's desk area office.

24 Q Okay. When I am trying to identify the body
25 cam that you wore, that was yours, because there's,

1 there's multiple body cam videos in this case, how do
2 I, how do I identify a video that is associated with
3 you?

4 A You mean through Axon or evidence.com?

5 Q I mean is there a number, for example, that
6 connects it to you, or?

7 A It should be attached to my badge number,
8 which 434.

9 Q Okay. So that should be the association?

10 A It should be. I haven't had any other body
11 camera assigned to me but the one that I currently
12 have.

13 Q Okay, all right. Tell me, I mean, how does
14 it all go to you. So Mr. Blanchard, he's visibly
15 upset, he walks you into Cozzi's office. He's talking
16 to you the whole time, or?

17 A Yes. He was explaining kind of how their
18 dynamic worked in the office and that while they
19 weren't working in tandem on cases that they still kind
20 of understood that -- the patterns of them keeping
21 their doors open, them closing them if they were in
22 court, or when they would actually be down at the
23 courthouse.

24 And that -- I remember that when he showed me
25 into his office that Mr. Cozzi's cell phone was still

1 playing Pandora or something like that and he mentioned
2 that that was also kind of odd, and.

3 This was kind of obviously a typical call.
4 So to me it was not unusual that someone would be upset
5 that someone's missing, but there was a, I guess, a
6 valid concern that he had where I'm just running
7 through a mental checklist of, like, well, maybe he
8 left to go on down to the, you know, local bar, did he
9 have any alcohol or substance issues or anything like
10 that, why would he have left everything and his
11 vehicle, and just try to make it make sense in my head
12 of where he could have gone.

13 Q Okay.

14 A And then there was another attorney present
15 and I believe she might have also talked to me, all of
16 us talking kind of the conversation at once of, you
17 know, what might have happened or what was going on.

18 Q Do you remember her name?

19 A I believe it was Watters was her last name.
20 Rebecca maybe.

21 Q Okay. And do you remember anything about
22 what Rebecca told you?

23 A She told me that, I believe, that their
24 offices were near each other or faced each other and
25 that while she wasn't totally paying attention to

1 everything that he did she would notice if he got up to
2 go microwave lunch or to use the restroom or if his
3 door was shut, they would, you know, consult each other
4 via yell across the hall kind of way.

5 Q Okay.

6 A And that she mentioned to me at one time that
7 they kind of knew each other's bathroom breaks, so
8 coffee breaks, and knew who had what on their docket
9 for the day.

10 And as we started walking through, like,
11 what -- where he would have gone, there was a second
12 door to his office that would have given him access to
13 the rest of the commercial building.

14 And I'm trying to recall. There was
15 something about the way that door opened or locked that
16 it -- if I -- and this is stuff that I didn't -- I
17 wouldn't have mentioned in my report. So I can't --
18 I'd have to watch the body camera footage to get it.

19 But it was something whatever was -- if the
20 door was locked that would have been unusual. But it
21 was unlocked. Or if it was locked, then that would
22 have been unusual.

23 And there was also open cases on the computer
24 of the desk and it looked like subpoenas or, you know,
25 warrants or whatever that was clearly being worked on.

1 Like, everything was in the -- there was a
2 workday in process and everything kind of going as if
3 there was a pause put on his work day.

4 Q Okay. The -- it indicates here that
5 Mr. Blanchard walked you through the building and to
6 the men's room or to the restroom.

7 A Yes.

8 Q What do you recall about that?

9 A When he walked me to the bathroom -- so the
10 bathroom is a single-stalled bathroom, but it's not
11 just the one room. There's an actual partition that's
12 there where the toilet is that can lock and then
13 there's a urinal and then the sink.

14 But as soon as you open the door, and the
15 door's very -- from what I remember, I think it had one
16 of those arms on the top that makes it kind of
17 self-close.

18 Q Which door? The door to the bathroom or
19 the --

20 A The bathroom.

21 Q Okay.

22 A From what I can recall. But as soon as we
23 opened the door there was a instant very, very strong
24 smell of what I took as bleach.

25 And I asked him can you show which -- because

1 the way he was describing it it was like, you know, it
2 was blood everywhere.

3 Well, at the first glance it wasn't very
4 noticeable. But then he started pointing things out.
5 And there was blood on the underside and around the
6 toilet bowl. There was --

7 Q When you say there was blood, there was --
8 would it be --

9 A What I believe to have been blood.

10 Q Okay. All right, go ahead.

11 A Given from what crime scenes I've seen, it
12 appeared to be blood. I also wondered if it could have
13 been feces. I didn't know.

14 Q Okay.

15 A And, but more noticeably was there was a
16 giant -- giant -- there was a maybe a foot I guess
17 circumference of a stain on the one wall inside the
18 bathroom stall and it was blue.

19 And I believe that was the source of the
20 chemical smell and whatever else had been on the floor.
21 And that --

22 Q What do you base that on?

23 A Because it was wet and I didn't -- I couldn't
24 ascertain and I just was guessing that whatever heat
25 was on the wall that it had started to lighten that

1 area where the chemical had been.

2 And then under the counter was a drain
3 clogger which was also blue which kind of was similar
4 to the color that was on the wall.

5 So I was, you know, surmising that whatever
6 that chemical, Drano or whatever it was, was what was
7 smeared or rubbed on the wall.

8 Q When you say it was blue, are you talking
9 about the liquid that was inside of the container was
10 blue?

11 A Yes. The same shade of blue was on the wet
12 stain on the wall.

13 Q Okay, all right. So you said, you know, he
14 had indicated there was blood everywhere. When you're
15 looking at it, you didn't really see blood everywhere.

16 A Once I looked, I interpreted that there was
17 blood in many places.

18 Q Would you describe it as a small amount of
19 blood, a large amount of blood? How would you describe
20 it?

21 A I would describe it as multiple areas inside
22 the bathroom that had small amounts of blood.

23 Q Okay, all right. What else did you see in
24 the bathroom?

25 A I want to -- I don't know if I can recall.

1 But I believe it was a lot of toilet paper or paper
2 towels in the actual toilet bowl that hadn't been
3 flushed, if I remember correctly.

4 Q Okay.

5 A And there was also some blood outside of the
6 bathroom and also -- looked like very a faint light
7 smear of what looked like blood on the out- -- exterior
8 door of that bathroom.

9 Q Okay. When you were walking around the scene
10 at this point, were you wearing any type of protective
11 cover for your shoes or anything like that?

12 A No.

13 Q Okay. You're familiar with those, those
14 little the booties that people wear sometimes. Is that
15 correct?

16 A Yes, um-hum.

17 Q And presumably Mr. Blanchard wasn't wearing
18 anything either?

19 A No, he was not.

20 Q Okay. And would part of the reason for that
21 would be that you didn't necessarily think at that
22 point that there was a crime scene?

23 A Right. I think things were very suspicious.
24 But, like I said, in my experience this wasn't
25 something that was immediately raising red flags to

1 call out a crime scene technician or anything like
2 that.

3 Q Okay. I mean even the small, you know, spots
4 of blood in various locations in and of itself didn't
5 necessarily suggest that a crime had occurred at that
6 location, right?

7 A Correct. My, my initial assumption was that
8 he had hurt himself or had a medical emergency --

9 Q Okay.

10 A -- and either left because of the medical
11 emergency, had hurt himself, you know, on purpose and
12 that --

13 Q Okay.

14 A And that's where my thought process was going
15 at that point.

16 Q Okay, all right. Other than leaving through
17 the front door of the building, were there other, other
18 places where he could have left the building?

19 A There was, I believe, one other door in that
20 building. It would have been a west-facing door facing
21 Belcher Road.

22 And from when we were on scene to get to that
23 door, you would have had to have passed several
24 other -- I guess I'll say they looked like conference
25 rooms is what I can compare them to. Some were

1 occupied, some weren't.

2 But the ones that were occupied, the doors
3 were open and there were other staff from the sister
4 building that were there. And none of them saw anybody
5 come through those -- that hallway to exit through that
6 door.

7 Q What about the part of the building that had
8 vacant offices to the -- I think it would be to the
9 south I guess?

10 A I don't recall there being an exterior door,
11 but it's possible that there could have been.

12 Q Okay, all right. And the body cam video
13 would be the best evidence of that presumably if you
14 were there or if someone else from law enforcement was
15 there?

16 A Or, you know, a blueprint to show if there's
17 a door there, yeah.

18 Q Sure. When I read the -- your report, it
19 appears that Mr. Blanchard taking you into the bathroom
20 happens before he then -- you then go back to his
21 office and he tells you that the wallet, Cozzi's
22 wallet, and phone and keys were still on his desk.

23 Am I reading that correctly, or?

24 A It's possible that he might have briefly
25 showed me where his desk was and I wasn't taking a

1 thorough examination of everything on the desk at that
2 time until after I saw the -- what appeared to be the
3 blood evidence in the bathroom.

4 Q Okay, okay.

5 A Which then deserved a deeper look at his
6 office.

7 Q Okay. And so then you do that and then you
8 go outside in the parking lot to check on the car that
9 you were being told is Cozzi's car in the parking lot?

10 A Yes.

11 Q And it's parked in the normal spot?

12 A It was in the same area that Mr. Blanchard
13 stated that Mr. Cozzi typically parked in.

14 Q Right.

15 A Just backed in kind of away from the
16 building.

17 Q Right. So where he normally might be parking
18 his car?

19 A From what Mr. Blanchard stated, yes.

20 Q Right. The -- you go out, you look into the
21 interior. It's unoccupied, there's nothing out of the
22 ordinary. Right?

23 A Correct.

24 Q Okay. Michael Montgomery then arrives at the
25 scene and he appears to be upset as well, visibly

1 upset?

2 A Yes. Without my knowledge or, you know,
3 instruction, Mr. Blanchard had called him to, I guess,
4 come down and speak with us. So then I was able to
5 interview him about where Mr. Cozzi possibly could have
6 been.

7 Q Okay. And he shows you a Ring video so you
8 can see the attire of Mr. Cozzi when he left the home
9 that morning?

10 A Yeah. Again, I was under the assumption and
11 running with the idea that this could have been
12 self-inflicted or a medical issue. So I kind of wanted
13 to get a background on how the morning was prior to him
14 coming to work.

15 Q Right.

16 A If they had an argument, what was his, you
17 know, mental health status, things like that. And he
18 stated they had a good morning and Mr. Cozzi brought
19 him coffee in bed and then he took his lunch to work
20 and that he was able to show me the Ring camera footage
21 from their front door of him exiting with -- I believe
22 he carried his lunch in like a reusable Publix bag or
23 reusable shopping bag and with the clothing that he had
24 on.

25 And now I knew what he -- I got a good visual

1 of what he looked like.

2 Q Okay. Mr. Montgomery indicated then
3 Mr. Cozzi had some -- suffered from anxiety, was on
4 medication for that. Did he mention anything about
5 history of either drug or alcohol abuse?

6 A He had mentioned that he, I believe, had had
7 an alcohol issue in the past but that he had gone
8 through counseling or that was no longer, he was sober.

9 But to cover, you know, that possibility,
10 we -- I had other officers go out to -- there was a
11 couple of bars nearby within walking distance of the
12 office to just verify that he wasn't in there and that
13 he hadn't fallen off the wagon, if you will.

14 Q Right. When I look at your, at your report
15 and then there are statements attributed to various
16 people including Blanchard and Rebecca Watters, they
17 don't appear to be in quotation marks. Can I assume
18 that if it's not in quotation marks that it's basically
19 your summary of what they told you not word for word
20 what they told you?

21 A Correct. If it was in the quotes, it would
22 have been verbatim.

23 Q Okay, all right. So it appears that at some
24 point while you're speaking with Mr. Montgomery you
25 notified Sergeant Recla of the circumstances of the

1 case and requested that he respond.

2 A Yes. Things weren't making trail to what I
3 typically see on missing adult cases. And so given the
4 very unusual circumstances at where I was at this point
5 in the call, I notified him to just let him know what I
6 had and, you know, how -- what my plans were to run
7 with it and to continue investigating. Yeah.

8 Q And had anyone else responded at that point
9 or was it just you at the scene?

10 A My first initial back-up officer was Officer
11 Jones and I remember when I arrived on scene I at first
12 had to get clarification on what Suite 6 -- was it 6B
13 or -- there's something around. I couldn't figure out
14 how -- which building it was.

15 But I remember that I -- when I circled
16 around that he was pulling on scene with me.

17 Q Okay. So are the two of you together during
18 part of this, or?

19 A Some parts of it. But I'm also like we're in
20 tandem, he's kind of taking my instruction doing tasks
21 that I had asked of him.

22 Q Okay, all right. Are you senior to him or
23 just because you responded first?

24 A I am senior, but it was because I responded
25 first. It was assigned to me. So I was the primary

1 investigator at that point.

2 Q Okay. Do you know what time you reached out
3 to Sergeant Recla?

4 A A specific time. I can't recall that. No, I
5 don't know that.

6 Q Okay. The body cam, if it was active, might
7 help us with that?

8 A The radio log would probably be the best way
9 to do that.

10 Q The radio log.

11 A Yeah. Yeah, it would have shown when he
12 would have jumped on the call.

13 Q Okay, all right. It appears that at least
14 next in the sequence of events in the report you're
15 having another conversation with Rebecca Watters about
16 Mr. Cozzi, his habits and what he was working on and
17 the phone hearing and what have you.

18 A Um-hum.

19 Q Was there any mention at that point or up
20 until that point, was there any mention that they were
21 concerned about any particular individual as having
22 possibly harmed Mr. Cozzi?

23 A When we were talking about the case that -- I
24 even asked, like, is there any cases that are, you
25 know, highly stressful to him or personal or there's

1 been issues with, you know, whatever's going on with
2 the cases. Because I actually had to ask them, you
3 know, what kind of law are you practicing, is it, you
4 know, real estate, this and that.

5 So they kind of explained the cases that they
6 take. And I don't think they mentioned the name, but I
7 do recall that they -- and this might have been
8 Ms. Watters and Mr. Blanchard explaining that there was
9 one case that was -- they were dealing with somebody in
10 it that was maybe threatening him with action on the
11 Bar or something along those lines.

12 Q Okay.

13 A And I don't recall if they said that that had
14 to do with the case that he was -- I think it was a
15 deposition that he -- that was going on that morning.
16 I don't know if that was what they were specifically
17 referring to, that one or if it was another case that
18 he was having issues with the opposing counsel.

19 But they did mention that there was something
20 going on like that. But they also added that that's --
21 he would never do anything to himself because of that.

22 Q Okay. And there was no suggestion that the
23 other person would potentially cause any harm or that
24 there was a concern about the other person causing
25 harm?

1 A I think there was a -- there would have been
2 a statement or something along those lines of there was
3 a concern about maybe erratic behavior. But nothing
4 that -- no mentions of anybody harming physically
5 anybody.

6 Q Okay. Officer Jones assisted with taking
7 photographs, said you took about 40 photographs --

8 A Yes.

9 Q -- in Mr. Cozzi's office and the bathroom?

10 A Yes.

11 Q It says that you continue with collecting
12 evidence and view surveillance footage. What kind of
13 evidence did you collect?

14 A So I don't know that I specifically collected
15 anything. I might have -- and submitted it. I might
16 have collected it and handed it off to detectives later
17 on in the call.

18 But I did go -- once I realized that the
19 office building that I was in was owned and maintained
20 by the sister building across the way, I went next door
21 and said, you know, I know that -- can I view your
22 cameras.

23 And that's -- I spent some time over at the
24 veterinary's office. And then they sent an employee
25 over back, back to the building where the scene was and

1 they let me have access to the surveillance footage
2 there.

3 Q Okay.

4 A And that's when I began to walk through and
5 watch the surveillance footage.

6 Q Who else was allowed to participate in
7 viewing this surveillance footage?

8 A The female employee, I don't recall her name,
9 she was with me and she kind of went through it with me
10 a little bit and then she mentioned I have work to do,
11 go ahead, you know, see what you can see.

12 And I believe Detective Hunt at the end of my
13 workday might have been the one that took over watching
14 footage.

15 Q Okay. In your report you describe certain
16 things that you noticed in the surveillance footage.

17 A Yes.

18 Q Including attire of a person that -- walking
19 in around 8:34 a.m.

20 A That was earlier than that, but.

21 Q Earlier than that. Let me look. It says,
22 "834 hours a white male wearing blue jeans, a
23 light-colored jacket, face mask, and black gloves walks
24 from that" --

25 A Okay.

1 Q -- "area and enters the building."

2 A Okay. So I -- when I started watching the
3 surveillance, I wanted to see what time Mr. Cozzi
4 arrived at work.

5 Q Right.

6 A And if he is wearing the same clothing that
7 he was seen wearing when he left the house.

8 Q Right.

9 A I went back to -- I mean I think it was like
10 sun-up is how far back I went from the very beginning.

11 Q Right.

12 A And, I'm sorry, you're saying at 8:34 a
13 person wearing a jacket and jeans?

14 Q Yeah. In your report you have, "8:34 is a
15 person, a white male wearing blue jeans light-color
16 jacket, face mask, and black gloves walking from the
17 area of the west parking lot."

18 A Okay, yes. So as I observed that I was -- I
19 thought it was unusual that they had a mask and gloves
20 on. Only because that we were -- people weren't really
21 gloving up and masking as strongly as they were the
22 year prior. And I took note that that was not the
23 clothing that Mr. Cozzi had on when he left the
24 residence.

25 Q Okay. You describe a dark-colored truck in

1 west parking lot which appears to be an older model
2 Toyota Tundra.

3 A Yes. When I observed the footage, it was --
4 from the distance where this vehicle was to where the
5 camera it was -- became very grainy. But I have a
6 knack with headlights and taillights and my guess was
7 that this was like a 2007-ish Toyota Tundra. That was
8 just my assumption on what kind of vehicle that was.

9 Q Okay. Do you recall verbalizing that as
10 well?

11 A Yes.

12 Q Then you're indicating at 837 hours Cozzi is
13 seen walking into the building. You describe what he
14 was wearing. And then people coming and going,
15 veterinarian employees coming and going until 1022
16 hours.

17 A Yes.

18 Q And at that point a white male wearing a blue
19 T-shirt, blue jeans, face mask, ball cap, gray-tan
20 backpack pulling a large tote is leaving.

21 A Correct.

22 Q Okay. And when you say prior to that there's
23 veterinarian employees coming and going, would you have
24 identified those people? Or how do you know that they
25 were veterinarian employees?

1 A They were wearing scrubs and some of them
2 were also employees I had talked to to gain access to
3 the surveillance footage.

4 Q All right. Then you indicate, "I showed this
5 footage to both Watters and Blanchard and they both
6 adamantly deny that this person was Cozzi."

7 Was there a delay in allowing them to see the
8 surveillance footage?

9 A Yes.

10 Q Okay. And what's the reason for that?

11 A No hard reason. They had told me that he was
12 wearing a blue sweater I believe after he got to work.

13 Q Right.

14 A And when I observed a person leaving in a
15 blue sweater, blue shirt, I had just assumed that that
16 was the same person.

17 Q Okay.

18 A When I still didn't see -- there's something
19 that was not -- I don't recall what it was, something
20 that was not making sense to what I was seeing in the
21 video footage is when I decided that I need them to
22 confirm who this is and if it was him or not.

23 Q Okay.

24 A And that's when I showed them the footage.

25 Q So your thought was that the person who was

1 walking out around 10:22 was Stephen Cozzi because of
2 the blue, the blue shirt?

3 A Correct.

4 Q Okay. And then, you know, looking at the
5 limited involvement seeing him in the earlier videos
6 and then seeing the person -- the unknown person
7 leaving at that time.

8 A Right. And it wasn't -- it was more of a who
9 else could it have been.

10 Q Okay, okay. All right. How long were you
11 there at the scene?

12 A I believe I didn't leave the scene until
13 maybe after 6:00 p.m.

14 Q Okay. So about six -- a little bit over six
15 hours, six-and-a-half hours, something like that?

16 A Yeah. I think when the call come out
17 eleven-something, 11:40, 40. Yeah, so about
18 six-and-a-half hours.

19 Q Okay. Do you recall discussing the amount of
20 blood that was found in the bathroom with Sergeant
21 Recla?

22 A I'm sure I would have. But I don't recall
23 detail about what I would have said.

24 Q Okay. But whatever is on the body cam video
25 would be --

1 A Yeah. That would have been what was
2 discussed.

3 Q Assuming, assuming that you didn't turn it
4 off when you talked to Recla, right?

5 A Correct.

6 Q Okay. Do you recall talking to him about the
7 amount of blood?

8 A I don't specifically recall. But knowing how
9 I, you know, inform supervisors of what's going on and
10 what my opinions and me having a thought process out
11 loud, that would have been most certainly something I
12 would have talked about.

13 Q Okay. And did you also discuss the amount of
14 blood that was found in the bathroom with Detective
15 Bolton and Detective Hunt in the back offices of the
16 Tampa Bay Veterinary Specialists?

17 A I'm assuming, yes. They were the two that
18 were, I guess, the primary detectives that were called
19 out to the case. So I would have debriefed them on
20 whatever I viewed or had opinions on and wanted, you
21 know, to know more about.

22 Q Okay. And do you recall what you concluded
23 about the amount of blood when you spoke with Bolton
24 and Hunt?

25 A No, I don't.

1 Q Would it be likely that it may have included
2 your thought that it was not a large amount of blood?

3 A From what I could see with my naked eye, it
4 did not seem like there was a lot of blood left on the
5 floor or wall or whatever.

6 Q Okay, all right. Did Detective Bolton -- did
7 you observe him entering, enter the bathroom in
8 question?

9 A I can't recall if it was Detective Hunt or
10 Detective Bolton that I -- as I walked them through
11 what I had learned and the scene. But I do recall
12 showing either Detective Bolton or Detective Hunt the
13 interior of the bathroom.

14 Q Okay. Do you recall whether or not either
15 one of them were wearing those little booties for their
16 shoes?

17 A I don't believe they would have been. But I
18 can't say for certain.

19 Q Okay. And you don't remember one way or the
20 other?

21 A No, I don't.

22 Q Okay. Were you wearing gloves when you were
23 walking in the office --

24 A No.

25 Q -- during those six hours?

1 A No.

2 Q Okay. Do you recall possibly touching the
3 outside door, and I'm not sure, to the bathroom with
4 your hand without the gloves on?

5 A I don't believe I had gloves on at any point
6 during this call.

7 Q Okay. Do you recall touching, like, the door
8 to the bathroom for example?

9 A The door specifically, no. I'm assuming I
10 would have touched the door handle. But it's possible
11 I could have touched some portion of it to hold it
12 open, or.

13 Q And, again, whatever is on the body cam video
14 as it relates to that --

15 A Right. I do believe that I -- one of my
16 fingerprints was lifted from the building.

17 Q Right.

18 A But I don't believe it was from the bathroom
19 door.

20 Q Do you recall where it was from?

21 A I think it was another room, like a utility
22 closet in the building.

23 Q Okay.

24 A From what I can recall hearing throughout the
25 investigation.

1 Q Like the electrical room?

2 A I believe that's where it was lifted from.

3 Q Okay. And Sergeant Recla, was he wearing
4 gloves?

5 A I would have to say no. I don't believe he
6 was in the building for very long.

7 Q Do you recall him touching the outside door?

8 A No. But he might have.

9 Q Did you witness Detective Bolton enter the
10 bathroom and touch items in the bathroom without gloves
11 on?

12 A No.

13 Q You're saying he didn't or you don't recall?

14 A I don't recall that.

15 Q Okay. Same question for Detective Hunt.
16 Remember him entering the bathroom and touching things
17 without gloves on?

18 A No, I don't recall him -- I don't have any
19 direct memory of that.

20 THE COURT REPORTER: What was the
21 detective's name again?

22 MR. BRUNVAND: Which one? Was it Recla?

23 THE COURT REPORTER: Was it Kurt you just
24 said? You just said it.

25 MR. BRUNVAND: Hunt. Could have been

1 Hunt. There's Sergeant Recla, Detective
2 Bolton, and Detective Hunt.

3 THE COURT REPORTER: Okay, maybe I just
4 misheard the last one you asked about.

5 A I thought you were asking first Bolton and
6 then Detective Hunt.

7 Q Okay. What about yourself, did you, did you
8 touch items within the bathroom?

9 A I might have touched the bottle of the liquid
10 cleaner, but I don't believe that I did. I don't know.
11 That's not something I typically would have done on a
12 scene.

13 But I don't, I don't recall touching or going
14 through anything in the bathroom. I'd have to refer to
15 my body camera footage to give you a definitive answer
16 on that.

17 Q Okay. And I thought I asked about Recla, but
18 just to make sure. Did Sergeant Recla enter the
19 bathroom and touch items without gloves on?

20 A I don't believe so, but I don't -- I can't
21 recall if he did or did not.

22 Q Okay. And finally the same question for
23 Officer Jones, did he enter and touch without gloves
24 on?

25 A He might have manipulated doors and things

1 like that to take the photographs. But I don't believe
2 that he, like, touched anything else inside the
3 bathroom to look at it or pick it up or anything like
4 that.

5 Q Okay. When you responded to the scene, were
6 there any other officers present at that time?

7 A No.

8 Q And next one who arrives Officer Jones,
9 right?

10 A Correct.

11 Q And how much longer after your arrival does
12 Officer Jones arrive?

13 A I'm fairly certain that we arrived pretty
14 simultaneously. I believe I arrived on scene prior to
15 him, but I had to circle the parking lot to find the
16 correct suite that I was looking for. And I think
17 around that time he would have pulled on scene from
18 what I remember.

19 You'd have to look at the radio log to see
20 when we both arrived on scene.

21 Q Okay.

22 A I'm fairly certain it was very close to each
23 other.

24 Q So the radio log would be the best way to --

25 A Yes.

1 Q -- to figure out those times?

2 A Yes.

3 Q And would that also tell us the next law
4 enforcement who arrived and who that was?

5 A Yes.

6 Q Who was the next law enforcement officer?

7 A So I believe it would have been Sergeant
8 Recla.

9 Q Okay.

10 A But I know that units would have been placed
11 on the call and would be showing up on scene. But that
12 might also be that they were conducting the welfare
13 check at Mr. Cozzi's residence. And I don't know in
14 what order or when that would have happened off the top
15 of my head.

16 Q When, when do the detectives arrive?

17 A I wouldn't be able to tell you a specific
18 time without looking at the radio log myself. But
19 after speaking with Sergeant Recla and then I believe
20 he notified the ISD lieutenant, who is the lieutenant
21 of investigations. She would have then dispatched
22 Detective Hunt out.

23 And I believe that would have been at least
24 an hour or two hours after I had already been on scene.

25 Q Okay. Do you know the color of the shirt

1 that Cozzi was wearing under the red sweater?

2 A No. It might have been blue.

3 Q Okay. I think you've already answered this.

4 But how did you determine that the person of interest
5 leaving at 10:22 a.m. was not Stephen Cozzi?

6 A It was after the footage was shown to
7 Mr. Blanchard and Ms. Watters where they were adamant
8 and immediate to dismiss that as being Mr. Cozzi.

9 Q Okay, all right. Okay. Did you speak to
10 anyone about homeless population surrounding 1501
11 Belcher?

12 A Possibly. I don't have a specific memory
13 that I did. But there's, there's a decent homeless
14 population in the city of Largo as a whole.

15 Q Okay. In that general area as well?

16 A If I trespass someone from one area, they
17 flock to another. So it just kind of is anywhere and
18 everywhere.

19 It's -- this isn't as populated as it would
20 be down on 49th Street where there's much more homeless
21 individuals. But there's not an area in Largo that
22 doesn't have homeless people loitering or setting up
23 camp.

24 Q Sure. But I mean we can agree that there's
25 certain areas like off of Indian Rocks Road in Largo

1 that really have no homeless people and then --

2 A A few blocks south will be plenty.

3 Q Right.

4 A Yeah.

5 Q Right. Okay. So this area of Belcher, it's
6 not unusual to see homeless people in that area?

7 A No.

8 Q Do you recall anyone telling you that there
9 was a large homeless population and homeless people
10 hanging out in the back of the building?

11 A I don't recall that specifically. My
12 knowledge of that area is that I worked in at the time
13 of this investigation was that there were homeless
14 individuals that would stay at a 24-hour laundromat
15 that was just I believe north of that area and there is
16 some, like, mobile home parks that are in the area that
17 would probably provide a decent shelter from view of
18 the road that would be utilized by homeless.

19 Q Okay. Did you notice a gray Toyota Tacoma
20 truck in the south parking lot of the 1501 Belcher when
21 you did the walk-through?

22 A No. Not that I can recall.

23 Q Okay.

24 A I believe that there was any -- -- you're
25 starting to kind of refresh my memory on some of this

1 stuff. And that might have been possible, but I can't
2 remember a specific -- I can't, I can't remember that.

3 Q Okay. Maybe if you were to view the body cam
4 footage again, maybe that would refresh your memory on
5 some of this?

6 A Yeah, I'm sure it would.

7 Q Okay. Is that something that you would do
8 prior to trial should this case go to trial?

9 A Yes.

10 Q Okay. And I'm going to assume since you
11 don't remember about a Toyota Tacoma truck that you
12 don't -- you're not going to remember if you did this.

13 But did you alert other law enforcement,
14 especially Detective Bolton and Hunt, that you had seen
15 a Toyota Tacoma truck in the south parking lot?

16 A I don't know that I would have been alerting
17 them to a Toyota Tacoma because it was a Tundra is what
18 I saw on the camera. But if someone else brought up a
19 line of like maybe this Tacoma is involved, I might
20 have done that.

21 Q What -- again, I'm not that good when it
22 comes to cars and trucks and what have you. But what's
23 generally the difference between a Tundra and a Tacoma?

24 A Just the designs of the taillights are
25 different and they're two different size vehicles. I

1 probably wouldn't be confusing one with the other.
2 Just from the width of the separation of the tires
3 along the side of the bed or the length of the vehicle
4 and then the lights on the bed.

5 Q Okay. And when you say there's a size
6 difference, which one is larger?

7 A The Tundra.

8 Q Okay. And since you don't recall the truck,
9 I'm assuming that an attempt to identify an owner of a
10 truck, whether it's Tacoma or anything else, was not
11 made by yourself at least?

12 A I can't recall that.

13 Q Okay. Do you know whether or not any other
14 vehicles in that parking lot including, but not limited
15 to, a Toyota Tacoma truck became a vehicle of interest?

16 A Not that sticks out in my head.

17 Q Okay. Did anyone post in front of the
18 bathroom and keep track of any members of either law
19 enforcement or others who may have entered the bathroom
20 during that six hours?

21 A Officer Jones did. And I believe that we
22 notified the staff of the veterinary clinic for the
23 employees to not utilize that room. And there was one
24 other office that was occupied I believe towards the
25 end of the day and they were also instructed not to use

1 the restroom.

2 There was a Out of Order or like sign put in
3 front of it.

4 Q Okay. Do you know if anyone used the
5 bathroom during the time that you were there?

6 A No. No.

7 Q No you don't know or no one used the
8 bathroom?

9 A No, no one used the restroom.

10 Q Okay, all right. Can you indicate who from
11 law enforcement entered the bathroom that you know of?

12 A It would have been myself, Officer Jones,
13 Sergeant Recla, and then I either showed Detective
14 Bolton or Detective Hunt and possibly both of them as I
15 explained the call.

16 Q Okay. Did you ever observe Michael
17 Montgomery enter the bathroom?

18 A No.

19 Q Did you observe anyone else enter the
20 bathroom?

21 A No.

22 Q When was the area designated as a possible
23 crime scene and secured?

24 A Would have probably been after I notified
25 Sergeant Recla of my call and that we were going to try

1 to get a detective en route.

2 Q Okay. Did you notice any paper debris in
3 front of the bathroom door?

4 A Maybe some paper towels if I remember.

5 Q Okay.

6 A I don't, I don't remember any, like,
7 paperwork or anything like that.

8 Q Okay. Do you recall whether or not that
9 paper towel, if it was a paper towel, whether or not it
10 was there the whole time or whether or not it was
11 accidentally tracked out after you first arrived at the
12 scene?

13 A I don't, I don't know that.

14 Q Okay. Did you see anyone step onto the paper
15 debris?

16 A No. Not, not that I would have noticed.

17 Q All right. We talked for a little bit about
18 your report. Is there anything else, any other -- or
19 information that you have that you think might have
20 some evidentiary significance that's not included in
21 your report and that we have not discussed here today?

22 A No, I don't believe so.

23 MR. BRUNVAND: Okay, all right. I don't
24 have any other questions.

25 Mr. Vonderheide?

1 MR. VONDERHEIDE: No questions.

2 MR. BRUNVAND: Okay. Ms. Spadaro?

3 MS. SPADARO: No questions.

4 MR. BRUNVAND: All right. So if we
5 transcribe this deposition, which we probably
6 will, would you like to read or waive?

7 THE WITNESS: I'll read it.

8 (The deposition was concluded at 4:13
9 p.m.)

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ERRATA SHEET

DO NOT WRITE ON TRANSCRIPT -- ENTER CHANGES HERE

IN RE: STATE OF FLORIDA VERSUS TOMASZ KOSOWSKI

DATE TAKEN: APRIL 10, 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.

JENNIFER BURE

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF POLK)

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

WITNESS my hand and official seal this 8th
day of January 2025.

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 JENNIFER BURE, 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 8th day of January 2025.

18 
19

20 TAMMY KELLEY
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22
23
24
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January 8, 2025

Ms. Jennifer Bure
jbure@largo.com

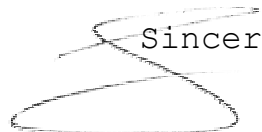
Dear Ms. Bure:

Your deposition taken in State of Florida versus Tomasz Kosowski on April 10, 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