

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

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO. 23-02935CF

TOMASZ KOSOWSKI,

Defendant.

\_\_\_\_\_/

VIRTUAL DEPOSITION OF FREDERICK CRAIG

DATE: December 5, 2023

TIME: 1:59 p.m.

PLACE: Various Remote Locations  
Via Zoom Video Communications

TRANSCRIBED BY  
REPORTER:

KIMBERLY L. RENFROE, RPR  
Stenographic Reporter

VIRTUAL  
APPEARANCES:

NATHAN T. VONDERHEIDE, ESQUIRE  
Assistant State Attorney  
Post Office Box 17500  
Clearwater, Florida 33762  
For the State

BJORN E. BRUNVAND, ESQUIRE  
Brunvand Wise, P.A.  
615 Turner Street  
Clearwater, Florida 33756  
For the Defendant

AMANDA POWERS SELLERS, ESQUIRE  
Amanda Powers Sellers, P.A.  
6344 Roosevelt Boulevard  
Clearwater, Florida 33760  
For the Defendant

ALSO PRESENT:

Kimberly G. Kittrell, Notary  
Virtual Monitor

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## 1 DEPOSITION IN DISCOVERY

2 FREDERICK CRAIG

3 Pursuant to notice duly given, the virtual  
4 deposition of FREDERICK CRAIG, called by the Defendant  
5 in the above-styled cause, was recorded by Kimberly G.  
6 Kittrell, a Notary Public in and for the State of  
7 Florida at Large, at the time and place and in the  
8 virtual presence of counsel enumerated on Page 2 hereof.

9 Thereupon, it was stipulated and agreed by and  
10 between the attorneys for the respective parties, by and  
11 with the consent of the said FREDERICK CRAIG, that  
12 signature to the said deposition be reserved.

13 THE NOTARY: And if you'll raise your right  
14 hand, please.

15 Do you swear or affirm that the testimony  
16 you're about to give will be the truth so help you  
17 God?

18 THE WITNESS: I do.

19 THE NOTARY: Thank you.

20 FREDERICK CRAIG, having been first duly sworn via  
21 Zoom Video Communications, upon interrogation in  
22 discovery, testified as follows:

## 23 DIRECT EXAMINATION

24 BY MS. SELLERS:

25 Q. Can you please state your full name?

1           A.     Frederick Dwayne Craig.

2           Q.     Mr. Craig, you -- I -- my name is  
3 Amanda Sellers. I represent Dr. Kosowski in a matter  
4 that occurred back in March of 2023. The purpose of  
5 this deposition is just to obtain some information that  
6 we have received that law enforcement gave to us that  
7 apparently came directly from you regarding some  
8 surveillance videos. Before we get into that, I'm just  
9 going to ask you a few preliminary questions.

10          Are you -- do you live in Pinellas County?

11          A.     Yes, I do.

12          Q.     And where do you work?

13          A.     I own a business; it's called Profusion  
14 Corporation. We're located in Largo at 1701 South  
15 Belcher Road --

16          Q.     Okay.

17          A.     -- 33 --

18          Q.     Have you ever given --

19          A.     -- 771.

20          Q.     Have you ever given a deposition before?

21          A.     Yes.

22          Q.     Okay. So you know the drill. If you don't  
23 know the answer to a question, just say I don't know.  
24 There's no wrong answer.

25          Apparently, at your business you have several

1 surveillance cameras; is that correct?

2 A. That is correct.

3 Q. And did law enforcement approach you regarding  
4 reviewing those cameras and the footage?

5 A. Yes.

6 Q. Do you recall that being around March 31st of  
7 this year?

8 A. Yes.

9 Q. And do you recall who the investigator was  
10 that spoke to you?

11 A. No, I don't remember their names. There is a  
12 couple of gentlemen that came by at the same time. I --  
13 I don't recall their names.

14 Q. How -- how many times did they visit your  
15 business?

16 A. I'm pretty sure it was just the one time when  
17 they came by and asked if they could have access to our  
18 video footage.

19 Q. What kind of surveillance system do you have  
20 set up there at your business?

21 A. It's just a basic camera system that -- it's  
22 hooked into a DVR. It's not -- it's no longer monitored  
23 at all by a company. The company that we bought that  
24 through was based in Jacksonville. They're still in  
25 business but we just didn't renew with them and we, --

1 you know, we have it on a DVR and that's all.

2 Q. Are those cameras motion-activated or are they  
3 current -- are they constantly running and recording?

4 A. They're motion.

5 Q. So once the motion activates the camera and  
6 you get a recording, are they automatically saved?

7 A. They are. They record to a DVR and then I --  
8 I don't know -- depends on how many activations there  
9 are on whether or not, you know, -- I don't know how  
10 long each recording will, you know, go before it's  
11 rewrote over on the DVR, 'cause it, -- you know, it only  
12 holds so much storage and then it rewrites over top of  
13 it, so, I think --

14 Q. Okay.

15 A. -- you know, about five or -- maybe -- maybe  
16 two to three weeks' worth of footage on an average.

17 Q. Do you recall which cameras were of interest  
18 to law enforcement?

19 A. Mostly the ones that faced our parking lot.  
20 There's -- there's a couple that face out at northeast,  
21 there's one that faces a little bit more northwest and  
22 they kind of canvass our parking lot and our gate entry.

23 Q. And those cameras, to your knowledge, were the  
24 dates accurate of the recordings of interest to law --

25 A. You know, --

1 Q. -- enforcement?

2 A. -- I -- you know, I don't know. I did not  
3 specifically view any of the footage at all and I don't  
4 know that the dates are the correct dates based on what  
5 calendar day they were recording versus what they may  
6 say on the recording because, you know, with power  
7 outages and so forth. I don't go on these cameras  
8 unless there's an incident, so I couldn't tell you for  
9 sure if the dates are accurate based on, you know, when  
10 their interests were, you know, taken as far as what  
11 they wanted to view. So I -- I can't say that they are  
12 or not.

13 Q. Okay. And same question regarding the time;  
14 same answer?

15 A. Yes. Correct.

16 Q. So law enforcement comes to your business, did  
17 they then request a copy of the recorded videos or how  
18 did they extract that information from your business?

19 A. Yes, they did. In fact, I had to call the  
20 company that I purchased the system from and that was  
21 monitoring it in order to get them an access code.  
22 'Cause, like I said, I don't go on these very often, and  
23 if I do, I have to do the same thing.

24 But what I did is I just gave them access to the  
25 DVR and they used a thumb drive; and once they, -- you



1 know, they spent quite a bit of time over there. It was  
2 in the evening. I remember I had just gotten back into  
3 town and I think I met them here at like 8:30 in the  
4 evening, somewhere around that time, and they used a  
5 thumb drive to re -- you know, extract whatever that --  
6 you know, they -- you know, viewed to -- that they  
7 wanted to record.

8 Q. And so I imagine they left you with a copy of  
9 whatever they extracted or did they take your -- your  
10 copy as well?

11 A. I didn't -- to get a copy, they -- they had,  
12 as far as I know, a thumb drive with them that they  
13 used, that belonged to them. No, I didn't get a copy of  
14 it myself.

15 Q. Okay.

16 And you said earlier, but I just want to make it  
17 clear for the record, after -- either before, during, or  
18 after, did you review any of these recordings from any  
19 of the cameras?

20 A. I have not.

21 Q. And do you have any other knowledge regarding  
22 this case or did you have any conversations with law  
23 enforcement as to why they were there?

24 A. Yes, I -- I have -- was a little bit aware  
25 what had happened and -- you know, so I kind of knew why

1 they wanted to look at our cameras, so I -- I -- you  
2 know, I didn't know what they would find, but I was --  
3 you know, welcomed them to, you know, find whatever they  
4 could on my cameras. But, no, I did have an idea of  
5 what had happened, yes, as, you know, some of the stuff  
6 that was going around here 'cause it's literally right  
7 next-door to my office.

8 Q. Okay. And you had knowledge of what happened.

9 Did you see anything happen or did you offer any  
10 information to law enforcement other than the recorded  
11 surveillance?

12 A. None whatsoever. I had no knowledge of, --  
13 you know, I personally didn't see anything so I wouldn't  
14 have any real knowledge of anything other than what I  
15 would have heard from someone else or on the news or  
16 whatever.

17 Q. Okay.

18 MS. SELLERS: Mr. Craig, that's all I have for  
19 you.

20 Mr. Vonderheide?

21 MR. VONDERHEIDE: No questions. Thank you,  
22 sir.

23 MS. SELLERS: Mr. Craig, the --

24 THE NOTARY: Would --

25 MS. SELLERS: -- the clerk -- or the court

1 reporter is taking down everything that you say.  
2 She's going to be transcribing this deposition.  
3 You can read the deposition after she transcribes  
4 it, make sure everything's accurate, or you can  
5 waive that reading. It's completely up to you.

6 THE WITNESS: I can waive that reading. I --  
7 I'm -- there's no reason for me to do anything  
8 else.

9 MS. SELLERS: Okay. Thank you, sir. I  
10 appreciate your time.

11 THE WITNESS: Okay. Oh, you're welcome.

12 MR. VONDERHEIDE: Thank you, sir.

13 THE WITNESS: Thank you.

14  
15 (THEREUPON, the virtual deposition concluded  
16 at 2:08 p.m.)  
17  
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22  
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24  
25

CERTIFICATE OF OATH


STATE OF FLORIDA

COUNTY OF PINELLAS

I, the undersigned authority, certify that  
FREDERICK CRAIG personally appeared before me via Zoom  
Video Communications and was duly sworn on December 5,  
2023.

Witness my hand and official seal this  
5th day of January, 2025.



  
KIMBERLY G. KITTRELL  
Notary Public, State of Florida  
Commission No.: HH 99385  
Expiration Date: 3/20/25

## 1 REPORTER'S DEPOSITION CERTIFICATE

2 STATE OF FLORIDA

3 COUNTY OF PINELLAS

4 I, Kimberly L. Renfroe, Registered Professional  
5 Reporter, certify that I was authorized to and did  
6 transcribe the electronically recorded virtual  
7 deposition of FREDERICK CRAIG; that a review of the  
8 transcript was not requested; and that the transcript is  
9 a true and complete record as I understood it to be.

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

15 Dated this 5th day of January, 2025.

16  
17   
18 KIMBERLY L. RENFROE, RPR  
19 Registered Professional Reporter  
20  
21  
22

23 (Transcript ordered by Jeanette Bellon, Esquire, on  
24 December 10, 2024.)  
25