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 ALICIA CRAIG

DATE TAKEN: AUGUST 29, 2024

TIME: 1:02 p.m. - 1:35 p.m.

Examination of the witness taken virtually before:

Tammy Kelley

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1	I N D E X	
2	AUGUST 29, 2024	
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4	WITNESS	
5	Called by the Defendant:	
6	ALICIA CRAIG	
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8	DIRECT EXAMINATION BY MR. WISE 4	
9		
10	ERRATA SHEET	
11	CERTIFICATE OF OATH	
12	CERTIFICATE OF REPORTER	
13	SIGNATURE LETTER	
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1 THE COURT REPORTER: Would you raise your
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- 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: Yes, I do.
- ALICIA CRAIG, called as a witness by the
- 8 Defendant, having been virtually duly sworn,
- 9 testified as follows:
- 10 DIRECT EXAMINATION
- 11 BY MR. WISE:
- 12 Q All right. So, Ms. Craig, I know we just
- 13 went over it. But can you tell us your name again for
- 14 the record, please.
- 15 A Yes. My name is Alicia Craig.
- 16 Q Okay. And you're still with the Collier
- 17 County Sheriff's Office I see?
- 18 A Yes, I am.
- 19 Q What's your current position there?
- 20 A I'm senior crime scene investigator.
- 21 Q Okay. How long have you been in that
- 22 position?
- 23 A The position itself, for approximately two
- 24 years.
- 25 Q Okay. And how long have you been a -- I

- 1 assume you may have been a crime scene investigator
- 2 before becoming a crime scene investigator?
- 3 A Yes.
- 4 Q Okay. How long have you been a crime scene
- 5 investigator in total?
- 6 A I've been in the crime scene section now
- 7 approximately 21 years if you include my internship
- 8 time.
- 9 Q Okay. Was that all with Collier County?
- 10 A Yes, it was.
- 11 Q All right. Did you work in the field or
- 12 otherwise work in law enforcement prior to that time?
- 13 A No, I did not.
- 14 Q Okay. All right. I see you prepared -- I
- 15 believe you prepared about a 17-page report. Is that
- 16 correct?
- 17 A Yes, that is.
- 18 Q Have you had a chance to review that?
- 19 A I have, yes.
- 20 Q Are there any errors in the report or
- 21 anything that was left out of significance?
- 22 A Not that I'm aware of, no.
- 23 Q Okay. And you worked at two different --
- 24 well, I quess three different scenes really if you
- 25 count the medical examiner's office. Is that right?

- 1 A I actually didn't go to the medical
- 2 examiner's office. I only did the first two scenes.
- O Okay. You had three listed, so that's why I
- 4 was double-checking. I know it sounds like the vast
- 5 majority of your work was probably done at scene two.
- 6 Would that be a fair assessment?
- 7 A Yes, it would.
- 8 Q Going through starting with scene one -- and
- 9 actually let me kind of ask too how -- because I'm not
- 10 that familiar with Collier and, you know, how things
- 11 may operate. Or it may depend, you know, by
- 12 investigation.
- But in this particular case, were you kind
- 14 of -- were you given directions as far as what to be
- 15 looking for, what to collect, what to document? Or
- 16 were you just kind of more given free rein to document
- 17 anything that you might, you know, determine to be
- 18 potentially relevant?
- 19 A At the first scene it was a little
- 20 combination of both to be honest. There were specific
- 21 items they were looking for. But there was also just
- 22 potential of any possible evidence that I was just
- 23 searching for in general.
- 24 Q Okay. And in doing that, I assume you're
- 25 using your training or experience to decide what might

- 1 be -- what to look for, what might be relevant?
- 2 A Yes, exactly.
- 4 lookout for? It sounds like there were some things
- 5 that law enforcement was telling you to look for?
- 6 A Yes. So what we were provided is the
- 7 information was potentially the victim's body was one
- 8 of the items and any items related to the homicide
- 9 incident, specifically if there's any license plates, a
- 10 red-colored sweater, blue-color-collared shirt, blue
- 11 jeans, a red blanket or tarp type of material, and
- 12 shoes as well and as well gray-colored like Gorilla
- 13 utility cart.
- 14 Q Were you given any information as far as what
- 15 any of those items were believed to have -- what
- 16 significance they may have had to the investigation or
- 17 believed to have?
- 18 A Just that they may have potentially been in
- 19 the incident itself.
- 20 Q Okay. The green waste management dumpster at
- 21 Monroe station, do you know if you were the first
- 22 person to inspect that?
- 23 A I'm not aware, no. When I got there, as far
- 24 as I was aware, I was the first person. But I don't
- 25 know if anyone did prior.

- 1 Q Okay. Were you the only crime scene
- 2 technician at that first scene or were there others
- 3 working there?
- 4 A There was one other girl as well.
- 5 Q Okay. Who was that?
- 6 A That was CSI Santiago Hernandez.
- 7 Q Right, right. So as far as the dumpster,
- 8 when you were searching that or inspecting that, was
- 9 any other law enforcement or technician with you at the
- 10 time?
- 11 A Yes. Actually members of the Largo Police
- 12 Department detectives from there were also --
- 13 Q You may -- I'm sorry.
- 14 A I apologize.
- 15 Q I think my question might not have been -- I
- 16 probably should have been a little more specific. I
- 17 know there were a lot of law enforcement out at the
- 18 scene. Right?
- 19 A Yes.
- 20 Q In the area when you're conducting the
- 21 inspection of this waste management dumpster, that
- 22 specifically, are you the only one inspecting it at
- 23 that point or are there others doing that as well? Not
- 24 just on scene but actually inspecting that dumpster.
- 25 A Oh, no, I apologize. I was the one that was

- 1 actually inspecting the dumpster, like doing the
- 2 processing of the dumpster.
- 4 very specific before, so. And I think you said this
- 5 before. But you don't know -- when you're inspecting
- 6 that, you don't know if anyone else, any other law
- 7 enforcement, had, you know, searched or inspected that
- 8 dumpster in any way?
- 9 A No, I did not.
- 10 Q What did you do to kind of inspect the area
- 11 around that dumpster? And that was -- it's kind of a
- 12 broad question.
- 13 A Well, I visually examined anything of
- 14 potential evidence around the area. I photographed the
- 15 area and as well as taking digital video recordings of
- 16 the area.
- 17 Q Okay. And do you know if anyone else prior
- 18 to you had inspected the area surrounding the dumpster
- 19 not just the dumpster itself?
- 20 A I'm not aware if they did or not.
- 21 Q Just kind of describe, you know, the
- 22 processing you did in the area around. Can you
- 23 describe, you know, in as much detail as you can what
- 24 processing you did of the dumpster itself?
- 25 A Sure. There was quite a bit. I obtained

- 1 overall photographs of the dumpster. I obtained
- 2 digital video recordings of the dumpster, the exterior
- 3 as well as the interior. There were areas that had
- 4 potential evidence of possible touch DNA that I marked
- 5 areas with evidence markers. Those areas were
- 6 photographed.
- 7 I obtained swabs of suspected touch DNA from
- 8 the marked area. I pro- -- I actually requested that
- 9 CSI Santiago Hernandez process one specific area on the
- 10 exterior which was the southwest side for latent
- 11 prints. She did develop --
- 12 THE COURT REPORTER: Excuse me. Excuse
- 13 me.
- 14 A -- latent ridge detail --
- 15 THE COURT REPORTER: What did you --
- 16 A -- which I photographed.
- 17 THE COURT REPORTER: There is one thing
- 18 you had just said about for Santiago to process
- 19 the exterior. You said something of the side.
- I didn't catch what side.
- 21 THE WITNESS: Oh, it was the southwest
- side.
- THE COURT REPORTER: Okay, thank you. The
- audio -- there's a little something going on
- with your audio. I don't know what it is or if

- 1 I'm the only one catching that.
- THE WITNESS: Let me see. Is that better?
- 3 THE COURT REPORTER: It kind of just
- 4 garbles just a little bit.
- 5 MR. WISE: Now and again it kind of comes
- in and out. And it might just be from the
- 7 phone moving. I don't know if that's it or
- 8 not.
- 9 THE WITNESS: I had it sitting up. Maybe
- 10 like --
- 11 THE COURT REPORTER: If you don't mind,
- 12 could you turn off your video and see if your
- 13 audio comes out clearer.
- 14 THE WITNESS: Sure.
- 15 THE COURT REPORTER: Now can we try again.
- 16 Can you say something.
- 17 THE WITNESS: Sure. Is that better?
- 18 THE COURT REPORTER: Well, right now, I
- mean.
- 20 MR. WISE: It's a lot better --
- THE COURT REPORTER: We can try.
- MR. WISE: -- on my end anyway.
- THE COURT REPORTER: Thank you.
- 24 THE WITNESS: Would you like me to go back
- on camera?

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1 THE COURT REPORTER: I would prefer --
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- 2 MR. WISE: Prefer keeping the video off.
- 3 THE COURT REPORTER: Yeah.
- 4 MR. WISE: Because I think the audio is
- 5 better with the video off.
- 6 THE WITNESS: Okay, that's fine.
- 7 MR. WISE: Did you get everything you
- 8 needed then, Tammy?
- 9 THE COURT REPORTER: Yes. It cut out on
- 10 what side. So, yes, thank you.
- 11 Q So, Ms. Craig, do you remember where we left
- 12 off?
- 13 A Yes, I do.
- 14 Q Okay.
- 15 A So I had requested that CSI Santiago
- 16 Hernandez to process the southwest corner, southwest
- 17 sliding door and frame for the presence of latent
- 18 prints. Which she did at my direction. And latent
- 19 ridge detail was developed. I photographed that area
- 20 prior to her collecting them onto latent lift cards.
- Next I actually photographed the top rim of
- 22 the dumpster as well as the interior contents. I then
- 23 opened the southwest sliding door and photographed just
- 24 the, just the edge of it. I collected swabs of
- 25 suspected touch DNA from that area which was marked as

- 1 Evidence Marker 11. And I actually did the same thing
- 2 on the northwest door. That was marked EM12.
- 3 There were some unknown yellow-colored
- 4 fibers. They were actually located on the interior
- 5 ledge or edge of the northwest door. Those were
- 6 collected.
- 7 I then dawned a Tyvek suit and fire boots and
- 8 got into the dumpster. I photographed all the contents
- 9 of the dumpster while I was inside as well and then
- 10 began just handing the larger items out to the
- 11 detectives from Largo. Those items were set aside for
- 12 them to really search as I continued my search inside
- 13 the dumpster.
- I had located -- there was some black-colored
- 15 latex gloves that were actually in there that Detective
- 16 Sergeant Vigensky had stated to me that they were
- 17 potentially similar to those utilized and located in
- 18 the alleged suspect's vehicle. And so those were
- 19 collected. They were marked and collected.
- I then really searched the inside sides and
- 21 floor for any type of suspected blood or reddish-color
- 22 stains. Which inside the dumpster there were quite a
- 23 few stains of unknown origin. Multiple areas actually
- 24 were tested for presumptive -- with a presumptive blood
- 25 test testing negative for the presence of blood. But

- 1 there was one area that did test positive on the
- 2 northeast floor area of the dumpster. And that I
- 3 marked as Evidence Marker 16.
- I, like I said, I did perform a presumptive
- 5 blood test. It tested positive. And I collected a
- 6 swab from that tested site.
- And really from there I processed the top, it
- 8 was like the lids of the, of the dumpster itself for
- 9 latent prints. There were latent -- there was latent
- 10 ridge detail again that was developed by me. I
- 11 photographed those areas and collected those onto
- 12 latent lift cards.
- 13 CSI Santiago Hernandez and I obtained
- 14 measurements of the scene. Mostly in relationship
- 15 where the dumpster was located.
- The detectives then along with several other
- 17 people that were out there I guess had been searching
- 18 had then moved the dumpster onto its side so I could
- 19 photograph and search underneath the dumpster, which I
- 20 did. Nothing of true value was located underneath the
- 21 dumpster.
- 22 But while I was doing that, Detective Bolton
- 23 had located a spent casing within the dirt that was
- 24 actually southeast of the dumpster. And I marked that,
- 25 photographed that, collected it.

- 1 Q Okay. I want to go back to the casing in
- 2 just a minute. How did the dumpster get moved on its
- 3 side?
- 4 A They actually lifted it and moved it onto its
- 5 side.
- 6 Q Wow. So it's all done manually by, I assume,
- 7 like a group of officers?
- 8 A Yes. I believe it took five or six people to
- 9 do it.
- 10 Q I assume it was empty at that point?
- 11 A Yes, it was.
- 12 Q As far as the area that Santiago Hernandez
- 13 processed for latent prints, why was she asked to do
- 14 that specific task?
- 15 A Really -- so she was in training at the time
- 16 with me, I was her trainer, and was assisting me in any
- 17 way possible.
- And mostly she assisted me with scales. But
- 19 that was something that she felt comfortable doing and
- 20 I was right there alongside of her, so I just requested
- 21 that she process that area.
- 22 But mostly just really assisted me with
- 23 supplies and collection supplies as well as scale
- 24 placement.
- 25 Q And why that particular area as opposed to

- 1 any other? It sounds like you did some latent lifting
- 2 as well in other areas of the dumpster. Is that right?
- 3 A Yes, I did.
- 4 Q So any particular reason you had her do one
- 5 specific area and you did other areas?
- 6 A No. Honestly I just -- at the time I was
- 7 probably trying to get some other things done and I was
- 8 right there alongside of her. I knew that if she did
- 9 develop something that I would have to photograph it.
- 10 So I just -- I have her do that. And no specific
- 11 reason. She -- you know, she did that one area and
- 12 then I just continued on with the processing from
- 13 there.
- 14 Q Okay. The, the one area of the dumpster that
- 15 was positive for blood, the presumptive test that you
- 16 used, do you know if it distinguishes between human
- 17 blood and blood that could originate from some other
- 18 mammal or other --
- 19 A No.
- 21 A No, it does not. It just tells you if it's
- 22 blood. It really reacts to the hemoglobin or the heme
- 23 in it. It's the Kastle-Meyer type of test with
- 24 phenolphthalein.
- I do know there is a test that can do that.

- 1 But I wasn't required or requested to determine if it
- 2 was human blood.
- Okay. So as far as the presumptive goes,
- 4 that could have been a lizard, a cat, any --
- 5 essentially anything that has blood in its body. Is
- 6 that correct?
- 7 A That's correct.
- 8 Q And I know you mentioned swab of that, of
- 9 that particular possible blood. How -- was it just one
- 10 swab taken of that or were there multiple swabs taken
- 11 of that spot?
- 12 A Just one.
- 13 Q And are you privy to any of the testing that
- 14 would have been performed on that swab in the future --
- 15 not in the future but after the fact?
- 16 A No, I'm not. We didn't do any of that here.
- 17 Q That's what I thought. I wanted to confirm
- 18 that. Okay. Same kind of question for the prints.
- 19 Were you involved at all in any examination of the
- 20 prints that took place after the latents were lifted?
- 21 A No, I was not.
- 23 in regards to any latent print testing that may have
- 24 been performed later?
- 25 A I want to believe there probably was, but I

- 1 don't know if there was.
- 2 Q So the casing that Detective Bolton found,
- 3 how far away approximately was that from the dumpster?
- 4 A Um, oh. I would say it was approximately six
- 5 feet maybe.
- 6 THE COURT REPORTER: Can you repeat that.
- 8 THE COURT REPORTER: Can you repeat how
- 9 many feet again.
- 10 A Yes. I believe it was approximately six
- 11 feet.
- 12 Q You may, you may have said this and I
- 13 apologize if you did and it's probably in your report,
- 14 but I know it's a lengthy report. In what direction
- 15 leading away from the dumpster would that have been?
- Does that question make sense?
- 17 A Yes. It actually was southeast of the
- 18 dumpster.
- 19 Q Okay.
- 20 A So it would have been towards the, like, the
- 21 paved, the road area, that led east to the parking lot.
- 22 Q And when you say six feet southeast of the
- 23 dumpster, is that once the dumpster is flipped over on
- 24 its side or is that when the dumpster is laying, laying
- 25 flat?

- 1 A No, when it was laying flat.
- 2 Q Okay. And would that have been included with
- 3 the area that you processed surrounding the dumpster
- 4 before you started inspecting the dumpster?
- 5 A It would have been the area that I
- 6 photographed, yes.
- 7 Q And since that time have you gone and looked
- 8 at any of the photos to see if, you know, if it, you
- 9 know, may be seen in any of the photos or --
- 10 A I did --
- 11 Q -- did you pull it up?
- 12 A No. I did look at my photographs and
- 13 honestly I don't recall seeing it. In fact, until he
- 14 pointed it out to me, I didn't even notice it there.
- 15 O Okay. And how -- is it -- it's after the
- 16 dumpster's flipped that he finds the casing? Is that
- 17 correct?
- 18 A Yes. So I was actually -- so CSI Santiago
- 19 Hernandez and I, we were -- the dumpster was flipped up
- 20 and I was photographing underneath it and photographing
- 21 the bottom of the dumpster as she was helping with
- 22 scales.
- 23 And while we were doing that, Detective
- 24 Bolton had mentioned to me there's a casing over here.
- 25 Which it was kind of covered with sand. And it was --

- 1 I remember it being -- it was -- how to describe it.
- 2 It looked older, if that makes sense. It just -- it
- 3 looked weathered I guess. Really when I collected it I
- 4 could -- especially the headstamp was kind of dark and
- 5 just looked like it had been in the elements.
- And, so but I do remember it was kind of
- 7 covered with sand and dirt. So it wasn't, like, very
- 8 visual right out front, so.
- 9 Q Okay. It sounds like -- well, I don't want
- 10 to put words in your mouth. Would you have been
- 11 focused on the dumpster when Detective Bolton found
- 12 that casing?
- 13 A Yes, I would have.
- 14 Q Okay. And it sounds like -- did you see him
- 15 actually find that or he just came and told you that he
- 16 had found it afterwards?
- 17 A He actually called out to me and said, hey,
- 18 there's a casing over here.
- 19 Q Okay. And at that point was it still -- had
- 20 he picked it up or anything or done anything to
- 21 manipulate it or is it still in the state that he found
- 22 it?
- 23 A As far as I know, it was still in the state
- 24 that he found it.
- 25 Q And then did you take photographs of that, of

- 1 that casing?
- 2 A Yes, I did.
- 3 Q And had -- all the photographs you took that
- 4 day, were they provided to the detectives on the case
- 5 or to the State?
- 6 A I believe so. I -- to my understanding, I
- 7 turned everything in that I collected at all the scenes
- 8 including the photographs and videos into our property
- 9 and evidence section. It was my understanding that
- 10 they were going to come and collect it from our
- 11 property and evidence section.
- 12 Q And you had kind of described the state that
- 13 the casing was in at that point. Was it -- was it
- 14 still in its natural shape? Meaning it didn't look
- 15 like it had been stepped on or anything like that?
- 16 A I don't believe it was. I think it was
- 17 relatively in good condition. I mean it wasn't like
- 18 bent or anything.
- 19 Q Okay. And do you remember what was on the
- 20 head casing of the -- or the head of the casing?
- 21 A May I refer to my report?
- 22 Q Sure.
- 23 A Thank you.
- 24 Q And please feel free to refer to it for any
- 25 of these questions.

- 1 A Oh, thank you.
- 2 So I labeled this as EM1-17. One spent
- 3 casing bearing headstamp S as in Sam, T as in Tom, V as
- 4 in Victor, L as in Luger.
- 5 Q I think you kind of alluded to this earlier.
- 6 But did it appear that the casings had been recently
- 7 fired?
- 8 A I don't know if it was recently fired. It
- 9 just -- it had -- just honestly had like a weathered
- 10 appearance to me. It just kind of looked discolored
- 11 from time.
- 12 Q And your initial canvass of this area was met
- 13 with negative results as far as any potential evidence.
- 14 Am I correct about that? Not the dumpster itself but
- 15 the area surrounding the dumpster.
- 16 A Yes. The only thing that I remember was a
- 17 plastic lid that would have been with a cup with an
- 18 orange straw.
- And then there was a -- well, at one point --
- 20 I don't know if there are 12 in there now. But there
- 21 was a 12-pack or 18 -- 12-pack I think of beer, Bud
- 22 Light beer, a box underneath the dumpster itself like
- 23 kind of sticking out. But that was about it.
- 24 Q At the second scene that you went to -- well,
- 25 let me ask. Was it, was it surprising to you that

- 1 Detective Bolton finds this casing in the area that you
- 2 had already kind of processed?
- 3 A No. And I say that only because -- and it
- 4 was -- it seemed partially covered with the same dirt.
- 5 So I do know that area is a hunting area too. It's in
- 6 the Everglades. So people go hunting down there. So
- 7 it really wasn't that surprising to me.
- 8 Q Had you ever been out to that area in
- 9 connection to your work before, like to process
- 10 anything?
- 11 A Oh, no. Just driving past it.
- 12 Q Okay. And then the second scene is the
- 13 landfill. You don't go out there until the day after
- 14 you had been at the spot where the waste management
- 15 dumpster is. Is that correct?
- 16 A That's correct.
- 17 Q And when you go out on the second day to the
- 18 landfill, are you given any direction as far as what to
- 19 be looking for or, you know, what to be doing when
- 20 you're at the landfill?
- 21 A Yes. We actually had a briefing with
- 22 multiple people and the detectives from Largo again
- 23 reiterated just some of the case and the specific items
- 24 that I mentioned before, really the -- like I said, the
- 25 New Jersey license plate, the clothing items, and

- 1 blanket or tarp type of thing, and then the utility
- 2 cart. Oh, and shoes.
- 3 Q And I know from reading your report, but I
- 4 know it's a lengthy report. Were any of those items
- 5 found at either one of the scenes?
- 6 A Not that I'm aware. There were items found.
- 7 There was a sheet found and just, like, three pieces of
- 8 red-colored tarp. To my knowledge, I don't know if
- 9 those were the items that they were really looking for,
- 10 but they were of potential possibility. And so I -- at
- 11 the time I photographed and collected them. But I
- 12 don't know if those were the specific items.
- 13 Q Okay. Now, all the processing you did at
- 14 scene two, is that all documented in the report you
- 15 prepared?
- 16 A Yes, it is.
- 17 Q One other thing I forgot to ask about. When
- 18 you were at scene one, what was the weather like that
- 19 day?
- 20 A It was warm. It was -- the temperature that
- 21 I obtained in the shade was 84.2 degrees Fahrenheit.
- 22 Breezy and sunny.
- 23 Q Okay. No precipitation that day that you
- 24 recall?
- 25 A Not at all.

- 1 Q How about at the landfill, scene two, what
- 2 was the weather like that day? Was it the same or
- 3 anything different?
- 4 A No, it was pretty much the same. Sunny --
- 5 actually each of the days. Sunny, warm, and breezy.
- 6 Q March is a good time in Florida. The
- 7 landfill, is it -- you know, some landfills -- and I'm
- 8 not familiar with this one. I mean some are just
- 9 completely out in the open kind of like, you know,
- 10 like, a little hill I guess you say. Some are -- seem
- 11 to be covered and kind of I think everything that goes
- in them gets processed somehow, burned or whatever, be
- 13 incinerated.
- 14 What was this one like? Was it, was it --
- 15 describe the landfill if you could.
- 16 A Sure. Actually it's not something you can
- 17 even see. I've been there previously and I've never
- 18 been there. So I didn't realize how much was back
- 19 there.
- So there was a entry gate on the south side
- 21 of the -- and you'll drive forward and you're going to
- 22 go over like a weigh station, past office buildings,
- 23 past where there's like a biohazard type of building is
- 24 at. And you're going to continue driving. You'll
- 25 actually stop in the paved road to get into the back.

- 1 And where we were actually to go was -- this
- 2 gravel road continued forward but there was a paved
- 3 road that went up a really large hill and at the top of
- 4 the hill then the paved road ends and you go back to
- 5 gravel and they have what's called an observation deck
- 6 up there off to the right.
- 7 And so that's kind of -- like the first day
- 8 we all met there for the briefing and then only certain
- 9 ones of us then continued down this -- past the
- 10 observation deck down this gravel road.
- 11 You actually go to about a outhouse and then
- 12 you went southwest down the gravel hill to almost kind
- of like a makeshift parking lot I guess you would call
- 14 it. And then it -- looking eastward that was really
- 15 where the landfill was at.
- So the area that we were searching was
- 17 covered in mulch. So it was a large hill that we had
- 18 to climb up to get to the designated search area.
- 19 Q Okay. And do you know if that -- that's the
- 20 only landfill that services Collier County?
- 21 A That's a good question. I believe so, but
- 22 I'm not really positive.
- Q Okay. I know that's not your area of
- 24 expertise. I was just curious.
- 25 All right. Well, in the course of all the

- 1 work you performed on this case, can I assume that, you
- 2 know, whether you were directed to collect or process
- 3 any particular item you would have been documenting or
- 4 processing anything that you saw that might have
- 5 evidentiary value to the investigation?
- 6 A Yes, absolutely.
- 7 Q Okay. And it looks like from your report
- 8 that I think April 6th of 2023 is the last work that's
- 9 documented in your report. Am I correct about that?
- 10 A That sounds right. Yes, that's correct.
- 11 Q Okay. Have you done anything in connection
- 12 with this investigation since that time?
- 13 A Just writing my report and that was it.
- 14 Q Okay. All right. I think I asked this
- 15 specifically about day two. But with regards to all
- 16 the days that you worked on this case, did you document
- 17 in the report all the work you did at any particular
- 18 scene on any of those given days?
- 19 A Yes. Everything that I did is in my report.
- 20 MR. WISE: Okay. All right, I think those
- 21 are all the questions I have for you.
- 22 Pass it over to Mr. Vonderheide.
- 23 MR. VONDERHEIDE: I don't have any
- questions. Thank you very much for your time.
- 25 THE WITNESS: Thank you.

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Page 28
                           All right. And, Ms. Craig, do
 1
                MR. WISE:
 2
          you want to read or waive if this is
          transcribed?
 3
 4
                THE WITNESS: Read please, sir.
 5
                (The deposition was concluded at 1:35
 6
          p.m.)
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		Page	29
1	ERRATA SHEET		
2			
3			
4	DO NOT WRITE ON TRANSCRIPT ENTER CHANGES HERE		
5			
6	IN RE: STATE OF FLORIDA VERSUS TOMASZ KOSOWSKI		
7	DATE TAKEN: AUGUST 29, 2024		
8	REPORTER: TAMMY KELLEY		
9			
10	PAGE NO. LINE NO. CHANGE REASON		
11			
12			
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20	Under penalties of perjury, I declare that I have		
21	read my deposition and that it is true and correct subject to any changes in form or substance entered		
22	here.		
23			
24	ALICIA CRAIG		
25			

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Page 30
 1
                      CERTIFICATE OF OATH
 2
 3
 4
     STATE OF FLORIDA
 5
     COUNTY OF POLK
 6
 7
                I, the undersigned authority, certify that
     ALICIA CRAIG, virtually appeared before me and was duly
 8
 9
     sworn.
10
                WITNESS my hand and official seal this 20th
11
     day of December 2024.
12
13
14
                          TAMMY KELLEY
15
                          NOTARY PUBLIC - STATE OF FLORIDA
                          MY COMMISSION NO. HH 216644
16
                          EXPIRES: 02/07/26
17
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Page 31
              REPORTER'S DEPOSITION CERTIFICATE
 1
 2
 3
     STATE OF FLORIDA
     COUNTY OF POLK
                         )
 5
               I, TAMMY KELLEY, certify that I was authorized to
 6
 7
     and did stenographically report the virtual deposition of
 8
     ALICIA CRAIG, 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
     parties, nor am I a relative of any of the parties'
14
15
     attorney or counsel connected with the action, nor
16
     am I financially interested in the action.
17
               DATED this 20th day of December 2024.
18
19
20
                          TAMMY KELLEY
21
22
23
24
25
```

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Page 32
 1
 2
 3
     December 20, 2024
 4
 5
     Ms. Alicia Craig
     2463@colliersheriff.org
 6
 7
     Dear Ms. Craig:
 8
          Your deposition taken in State of Florida versus Tomasz
     Kosowski on August 29, 2024, has been transcribed. Per your
 9
     request to review the transcript, it is being held at our
     office at 728 South New York Avenue, Lakeland, Florida.
10
          Please call (863)500-3603 to make arrangements to do
     this during our regular business hours of 8:30 a.m. to 5:00
11
     p.m.
12
          Thank you for your prompt attention to this matter.
13
14
                                  Sincerely,
15
16
                                   Tammy Kelley
17
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