

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

CASE NO.: 23-02935-CF

STATE OF FLORIDA,

Plaintiff,

vs.

TOMASZ KOSOWSKI,

Defendant.

VIDEOCONFERENCE

DEPOSITION OF: REBECA D'JIMAS

DATE TAKEN: April 15, 2024

TIME: 2:08 p.m. to 2:25 p.m.

PLACE: Via Zoom videoconference

STENOGRAPHICALLY REPORTED BY:

Lori A. Seiden, RPR, FPR-C

Notary Public, State of Florida at Large

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(Appearing via Zoom videoconference)

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C O N T E N T S

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1 The deposition of REBECA D'JIMAS was taken pursuant
2 to notice by counsel for the Defendant on the 15th day
3 of April, 2024, commencing at 2:08 p.m., via Zoom
4 videoconference. Said deposition was stenographically
5 reported by Lori A. Seiden, RPR, FPR-C, Notary Public,
6 State of Florida at Large.

7 - - - - -

8 REBECA D'JIMAS,
9 a witness, having been duly sworn to tell the truth,
10 was examined and testified upon her oath as follows:

11 THE WITNESS: Yes.

12 DIRECT EXAMINATION

13 BY MS. RAMOS WICKS:

14 Q. Good afternoon. Is it D'Jimas? I want to make
15 sure I'm saying that right, Ms. D'Jimas?

16 MR. VONDERHEIDE: I'm sorry to interrupt you,
17 but the witness is going to have to agree to the
18 recording before it's recorded.

19 THE WITNESS: I agree.

20 MR. BRUNVAND: And, Nathan, just so you know,
21 whenever the recording is turned on, there's a thing
22 that comes on that basically anyone -- everyone
23 involved has to, like, click and say "yes" for the
24 first time, but it's a good thing that we cover
25 that.

1 THE WITNESS: I agree.

2 BY MS. RAMOS WICKS:

3 Q. Thank you, Ms. D'Jimas. I appreciate it.

4 Am I saying your last name right?

5 A. It's D'Jimas.

6 Q. D'Jimas. Okay. I wanted to make sure I get
7 that right. Thank you, Ms. D'Jimas.

8 Can you spell your first name and -- sorry.
9 State your first and last name and spell your last name
10 for the record?

11 A. Yes. Hello. My name is Rebeca D'Jimas; D as
12 in David, apostrophe, J-i-m-a-s.

13 Q. All right. Ms. D'Jimas, where do you work?

14 A. I work for Pinellas County Sheriff's Office in
15 the forensic sciences division.

16 Q. And how long have you worked in the forensic
17 sciences division for PCSO?

18 A. Over 20 years.

19 Q. All right. And during the 20 years that you've
20 worked there, what are some of the examples of the
21 positions that you've held during your time there?

22 A. Sure. I was a forensic science specialist.
23 I've been a field training officer, a major case
24 response team member, assistant supervisor, supervisor.
25 I am the FTO coordinator, and I'm the technical manager.

1 Q. Okay. And what's your current position with
2 PCSO forensics?

3 A. I'm a supervisor and I'm the technical manager.

4 Q. Okay. And what are your duties as a supervisor
5 and/or technical manager?

6 A. So for a supervisor, I'm basically responsible
7 for administrative tasks such as report reviews,
8 approvals, sending people out on calls, going on calls,
9 ensuring that policy and procedures are being followed.
10 I also do respond to crime scenes and process them
11 myself at times.

12 And then also for technical manager, I just
13 work with our quality assurance coordinator to make sure
14 we're in compliance with our policies and procedures,
15 SOPs, general orders through our accrediting body.

16 Q. All right. Ms. D'Jimas, did you write a report
17 or supplemental report connected to this case?

18 A. Yes, ma'am, I wrote two.

19 Q. All right. And have you had an opportunity to
20 review both of those reports prior to this deposition
21 this afternoon?

22 A. Yes, ma'am.

23 Q. All right. Are there any additions or
24 corrections or changes you need to make to either
25 report?

1 A. No, ma'am.

2 Q. All right. So at this point as we sit here,
3 the reports that you wrote are full and complete,
4 there's nothing else to add?

5 A. That is correct.

6 Q. Okay. So I wanted to turn our attention to
7 your first report where you document -- can you hear me?

8 A. I can hear you now.

9 Q. Just want to make sure. I didn't want to ask a
10 question and then you only get half of it.

11 A. Yes, ma'am.

12 Q. I wanted to turn our attention to a report
13 documenting your involvement in a search warrant that
14 you conducted at 511 Seaview Drive.

15 A. Okay.

16 Q. That would be the first report that I have that
17 you wrote, which is --

18 A. Okay. That's Supplement 16?

19 Q. That's right. I was just about to say that.
20 It is Supplement 16. Thank you.

21 A. Yes, ma'am.

22 Q. So when you responded initially to 511 Seaview,
23 were you briefed by a Largo PD or Tarpon Springs PD?

24 A. Largo.

25 Q. Okay. What was reported to you by Largo PD?

1 A. That a search warrant was being issued, the
2 SWAT team made the residence safe and secure, and for us
3 to go in there to document the residence.

4 Q. All right. And when you arrived at the
5 residence, what did you observe?

6 A. I just observed Largo Police Department
7 detectives there, and then -- and some Tarpon Springs
8 detectives were there. The Tarpon Springs SWAT team
9 arrived on scene and they were -- they had staged
10 outside of the residence.

11 Q. All right. And so in assisting with the
12 execution of the search warrant, did you have an
13 opportunity to enter the residence at 511 Seaview Drive?

14 A. Yes, after it was executed.

15 Q. Okay. And so what was the first area of the
16 residence that you entered?

17 A. The first area was the garage. The garage door
18 was opened and there was a vehicle inside of the garage.

19 Q. All right. And what vehicle was that?

20 A. It was a Toyota Tundra, like a pickup truck.

21 Q. Okay. And were you asked to do any processing
22 of the pickup truck?

23 A. I did not do any processing at this scene
24 whatsoever. I was the supervisor on scene.

25 Q. Okay. So as a supervisor on scene, what

1 essentially are you doing?

2 A. I'm just ensuring that what the detectives
3 request is getting performed by the specialists that are
4 on scene. And there were three of them on scene at that
5 time, so they were each denoted, like, a task. They
6 were assigned a task to complete, or multiple tasks to
7 complete during the execution of the search warrant.

8 Q. All right. And so you didn't assist any of,
9 you know, your employees that you're supervising with
10 the completion of any of those tasks as it relates to
11 the Toyota Tundra?

12 A. No.

13 Q. You said "no"? I just want to make sure I got
14 that.

15 A. Yes, I said "no."

16 Q. Okay. Thank you.

17 Did you discuss when the suspect acquired the
18 truck with either Largo PD or treasure -- or Tarpon
19 Springs PD?

20 A. Acquired the truck, no.

21 Q. Okay.

22 A. I don't recall. I don't remember anything
23 really about the truck except for what -- we took it
24 back to the lab and separately found in the bed and
25 stuff.

1 Q. Okay. So, you know, based on your answer,
2 would it be fair to say, then, that you didn't learn
3 anything about when the suspect first acquired the
4 truck?

5 A. If they discussed it on scene, I honestly don't
6 remember any details about when he acquired it.

7 Q. Okay. And so in your report, you also note
8 that, like, where the front entrance door to the
9 residence was and that there was a second floor, so a
10 first and second floor to the residence. Do you recall
11 that?

12 A. Yes. The front -- the actual entrance door was
13 on the second left. Is that what you're asking?

14 Q. Yes.

15 A. Yes.

16 Q. Okay. And did you have the occasion to go onto
17 the second level of the residence?

18 A. Yes, I did.

19 Q. All right. You note in your report that
20 Specialist Zuchetto completed OCSR360 photographs of the
21 second level of the residence?

22 A. Yes.

23 Q. Okay. Did you supervise Specialist Zuchetto
24 obtaining those photographs?

25 A. Did I -- no. She completed the OSC360

1 photographs.

2 Q. Okay. And would that have pertained also to
3 Specialist King and the photographs that were taken --
4 that she took of the exterior of the residence to
5 include the backyard and the pool area?

6 A. Are you asking if I assisted them in the
7 photography?

8 Q. Assisted or --

9 A. No.

10 Q. -- supervised, yeah.

11 A. Oh, I supervised, but I didn't assist them.
12 That is a one-person task.

13 Q. Okay. You just noted it in your report, so I
14 just wanted to know if you were there.

15 A. Yes. Yes. Yes, I was around them when they
16 were there just ensuring that -- if they needed
17 anything, you know, I'm kind of like the go-between to
18 see if they need supplies or anything like that. But
19 these are individuals -- these are tasks that they
20 perform on an individual basis, unless they need
21 troubleshooting or something like that.

22 Q. Understood.

23 And so were you also present when Specialist
24 King applied luminol to the garage floor area near the
25 east bay doors of the residence?

1 A. Yes.

2 Q. Okay. Did you witness Largo detectives or
3 Tarpon Springs PD detectives search within or around
4 511 Seaview?

5 A. Yes. Tarpon Springs, I believe, did the
6 physical search while Largo was there.

7 Q. Okay. And what, if anything, did you observe,
8 like, as far as the search is concerned?

9 A. The thing that stood out the most was there
10 were numerous weapons throughout the house. I had
11 notated in the different rooms in plain sight and in,
12 like, cabinets and stuff like that. And in the garage,
13 there was a bunch of license plates and stuff like that
14 in these huge container type things, but those are
15 things I documented in my report as a notation.

16 Q. Okay. Did you witness any other law
17 enforcement personnel search within or around
18 511 Seaview?

19 A. Was I present while they were doing their
20 search?

21 Q. Right.

22 Like, did you witness any other personnel
23 conduct the search?

24 A. Well, I was -- I was present, like, in the
25 areas when they were searching, if that's what you're

1 asking. I was present when they -- I was in the garage,
2 I was on the second floor walking through just, again,
3 really just focusing on my people, but I was present
4 during the search, if that's what you're asking.

5 I'm sorry. I'm a little -- I was a little
6 confused about the question.

7 Q. That's okay. No problem.

8 That is what I was asking as far as actually
9 witnessing the search warrant that they executed and the
10 searches being done of the residence.

11 A. Yes, I witnessed some of the search being
12 completed.

13 Q. Okay. Did you note anyone that seemed out of
14 place or, perhaps, shouldn't have been there?

15 A. No, ma'am.

16 Q. Okay. Were you able to discern who was Largo
17 PD and who was a Tarpon Springs PD, you know, detective
18 or personnel?

19 A. Yes.

20 Q. Okay. How was the search organized?

21 A. How was it -- you'd have to ask. I don't
22 understand why -- I don't understand how -- I can't
23 really answer how it was organized. They split up, if
24 that's what you're asking. They split up and they
25 teamed up, and Largo and Tarpon worked together in the

1 areas that we searched. But how they specifically
2 determined that, that is on them. You'd have to ask
3 them.

4 Q. Okay. How long was the entire search of
5 511 Seaview?

6 A. I can tell you from the time that we arrived to
7 the time we left, and -- but that doesn't include us
8 waiting on the search warrant, so it would be an
9 estimation. I was involved in the entire scene for,
10 like, 9.1 hours. So it would be a little bit less than
11 that, but I can't give you a direct time frame.

12 Q. Understood.

13 You already indicated that you witnessed, you
14 know, Largo PD personnel or Tarpon Springs PD personnel,
15 you know, search the contents of 511 Seaview.

16 Do you recall anyone specific as far as, you
17 know, anyone that you witnessed searching through
18 closets or drawers or suitcases or handling any of the
19 guns or the cars?

20 A. No. I don't recall who was specifically there
21 or what areas they specifically searched.

22 Q. Okay. Did you witness any Largo PD personnel,
23 specifically Detective Bolton or Detective Hunt, wear
24 shoe covers when walking through the garage of the
25 residence?

1 A. I don't recall that.

2 Q. Okay. And so once the luminol was sprayed on
3 the garage floor area, did that conclude your
4 involvement in this portion of the investigation?

5 A. Yes, that's the last process.

6 Q. All right. Thank you.

7 I'd like to move on to your second report -- or
8 actually, no, I did it backwards. So the first report
9 that I have is Supplement 10 and the second one is
10 Supplement 16. We've already discussed 16, so I'd like
11 to move on to 10 now, if that's okay. Are we on the
12 same spot?

13 A. Oh, I'm sorry. I said okay.

14 Q. Okay.

15 A. I'm sorry.

16 Q. I didn't hear you. It's okay. It's okay. I
17 just like to check in and make sure we're on the same
18 page before I start asking questions.

19 So as far as Supplement 10 is concerned, it
20 documents some involvement in processing some napkins?

21 A. Yes.

22 Q. Okay. So you indicated in your report that you
23 processed 351 napkins?

24 Sorry. I didn't get that if you said
25 something.

1 A. Oh, I didn't -- I didn't know that was a
2 question. I thought you were just stating something. I
3 thought you were leading into something. I apologize.

4 Yes, I stated that, if that's your question.

5 Q. Yeah, that is my question.

6 A. Yes.

7 Q. It was going -- it was going to be a least
8 convenient question.

9 A. Okay.

10 Q. So as far as the napkins are concerned, you
11 said that they were processed using ninhydrin. Maybe
12 I'm not saying that right. But what does ninhydrin do?
13 Like, what do you use ninhydrin for in processing the
14 napkins?

15 A. So ninhydrin is a chemical process that reacts
16 with the amino acids in our fingerprint ridge makeup
17 here. So any type of porous item that we can process.
18 Napkins aren't conducive really to, say, fingerprint
19 powder because they're so absorbent, so we use a
20 chemical application.

21 So we use that in a controlled setting in a
22 fume hood. We spray the chemical on it, you let it kind
23 of dry and let it react to the amino acids in our
24 residue. And if there's fingerprints, they're --
25 they're just in the color purple, so they're made

1 visible because we can't see them originally. So it
2 just makes the invisible visible.

3 Q. Okay. Did you find anything of value as far as
4 fingerprints or ridge detail on these napkins that you
5 processed?

6 A. For the actual napkins, all I did was apply the
7 chemical and then -- and with Sandra Lee -- I'm sorry,
8 Specialist King, and then she took custody of them right
9 back. So I don't know. She examined them. I just did
10 the physical -- helping her out to supply the chemical
11 to help her out.

12 Q. Understood. Okay.
13 So you weren't there for any examinations of
14 the napkins?

15 A. No ma'am.

16 MS. RAMOS WICKS: Okay. All right. That's all
17 the questions that I have. Thank you very much for
18 your cooperation, Ms. D'Jimas.

19 Bjorn, I don't know if you're still there. Do
20 you have any questions?

21 (No response.)

22 Okay. I'll check --

23 MR. BRUNVAND: I do not have any questions.

24 Sorry.

25 MS. RAMOS WICKS: No problem. Thank you.

1 And then Mr. Vonderheide, do you have any
2 questions?

3 MR. VONDERHEIDE: I don't. Thank you.

4 THE WITNESS: Okay. Is that it?

5 MS. RAMOS WICKS: Yeah, I believe that's it.

6 THE COURT REPORTER: Did you want to read or
7 waive?

8 MS. RAMOS WICKS: Oh. Would you like to read
9 or waive?

10 THE WITNESS: I'd like to read, please.

11 (At 2:25 p.m., no further questions were
12 propounded to this witness.)
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ERRATA SHEET

IN RE: STATE OF FLORIDA vs. TOMASZ KOSOWSKI
DEPOSITION OF: REBECA D'JIMAS
TAKEN: 04/15/2024

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE

Please sign, date, and return this sheet to our office.
If additional lines are required for corrections,
attach additional sheets.

At the time of the reading and signing of the deposition the following changes were noted:

PAGE	LINE	CORRECTION	REASON
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Under penalty 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.

SIGNATURE OF DEPONENT:

DATE: _____

CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF PINELLAS

I, Lori A. Seiden, RPR, FPR-C, Notary Public,
State of Florida, certify that REBECA D'JIMAS virtually
appeared before me on the 15th day of April, 2024, and
was duly sworn.

WITNESS my hand this 26th day of December 2024.

Lori A. Seiden



Lori A. Seiden, RPR, FPR-C
Notary Public - State of Florida
My Commission No.: HH 226917
My Commission Expires: June 6, 2026

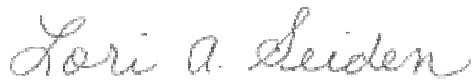
1 CERTIFICATE OF REPORTER

2
3 STATE OF FLORIDA4 COUNTY OF PINELLAS
5

6 I, Lori A. Seiden, RPR, FPR-C, do hereby certify
7 that I was authorized to and did stenographically
8 report the foregoing deposition of REBECA D'JIMAS; that
9 a review of the transcript was requested; and that the
10 foregoing transcript is a true and complete record of
11 my stenographic notes.

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

17
18 Dated this 26th day of December, 2024.

19
20 

21 _____
22 Lori A. Seiden, RPR, FPR-C
23
24
25

December 26, 2024

REBECA D'JIMAS
rdjimas@pcsonet.com

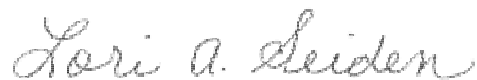
Dear Ms. D'Jimas:

Your deposition taken in the case of State of Florida vs. Tomasz Kosowski on April 15, 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, until January 26, 2025.

Please call (863) 682-8737 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 cursive script that reads "Lori A. Seiden".

Lori A. Seiden, RPR, FPR-C