

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 CHRISTINA GREENE

DATE TAKEN: AUGUST 1, 2024

TIME: 12:31 p.m. - 1:14 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
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Counsel for the Defendant:

WILLENGY W. RAMOS WICKS, Esquire
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615 Turner Street
Clearwater, Florida 33756

I N D E X

AUGUST 1, 2024

WITNESS

Called by the Defendant:

CHRISTINA GREENE

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CERTIFICATE OF REPORTER..... 39

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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: Yes, ma'am.

7 MS. RAMOS WICKS: So, Ms. Greene, I'm gonna
8 hit the record button. I just wanted to let you
9 know that we're going to start recording from this
10 point on. Okay?

11 THE WITNESS: Okay. Can we do it so it's
12 just a voice recording versus video recording?

13 MS. RAMOS WICKS: Well, I, you know, for the
14 purposes of this deposition, would prefer that it
15 be on voice and video. But I can let, you know,
16 obviously Mr. Vonderheide have some input, you
17 know, depending on what --

18 MR. VONDERHEIDE: So she has to consent to
19 the recording according to the depo rules. So I
20 guess I don't see why the witness couldn't narrow
21 her consent.

22 So meaning I guess Ms. Greene could --
23 because I personally don't know how to do it with
24 the -- just the audio recording.

25 MS. RAMOS WICKS: Well, she'll just have to

1 turn her video off.

2 MR. VONDERHEIDE: But mute her camera I
3 guess.

4 MS. RAMOS WICKS: Right. Yeah, she would
5 just have to turn her video off and then we can
6 just go with an audio recording for this one.

7 THE WITNESS: Okay. You guys good with that?
8 Can I -- okay with me doing that? Want to turn it
9 off now?

10 MS. RAMOS WICKS: I mean that's what you're
11 willing to consent to. So I just want to make
12 sure that, you know, everybody's on the same page.

13 I mean obviously am not going to tell you
14 what to do. I mean if you're willing to consent
15 to audio recording, then that's fine by me and
16 I'll just record on audio. Okay.

17 THE WITNESS: I'll go ahead and turn my video
18 off now then. Okay.

19 MS. RAMOS WICKS: She was sworn in. So I'll
20 just put that she was sworn in on the record and
21 that she has her video off once we go on the
22 record.

23 CHRISTINA GREENE, called as a witness by the
24 Defendant, having been virtually duly sworn,
25 testified as follows:

1 DIRECT EXAMINATION

2 BY MS. RAMOS WICKS:

3 Q All right, good afternoon, Ms. Greene. My
4 name is Willengy Ramos Wicks and I am an associate
5 attorney at Brunvand & Wise, P.A.

6 Along with myself is also Bjorn Brunvand
7 who's not here on this virtual forum, but I wanted to
8 identify him as well because he is the lead attorney on
9 the case and my boss.

10 Along with me and also Mr. Brunvand, there's
11 several other attorneys that are involved in the case
12 and we also represent Tomasz Kosowski in this matter.

13 So in addition to myself, there's one more
14 attorney here on this virtual forum today. His name is
15 Nathan Vonderheide and he's the lead attorney on behalf
16 of the State of Florida in this case.

17 And then of course we have our amazing court
18 reporter, Tammy Kelley, who's making a record of this
19 proceeding. Okay?

20 A Okay.

21 MS. RAMOS WICKS: All right. And, for the
22 record, just prior to coming on we discussed
23 consent to record on both audio and video and
24 Ms. Greene indicated that she would consent to
25 audio recording.

1 She was identified with her legal form of
2 I.D. and was previously sworn in prior to the
3 recording started.

4 Q Is that accurate?

5 A Yes.

6 Q Okay. Perfect. So we're going to go ahead
7 and get started. Can you please state your first and
8 last name and spell your last name for the record.

9 A It's Christina Greene, G-r-e-e-n-e.

10 Q All right. Ms. Greene, the reason why you're
11 here today is because you were listed as a witness by
12 the State of Florida.

13 So what that essentially means is that you
14 saw something, heard something, know something related
15 to the case and you could potentially testify about
16 what you saw, what you heard, what you know during a
17 trial on this case. That gives the defense an
18 opportunity to then take your deposition.

19 So a deposition is a sworn proceeding.
20 That's why you were placed under oath just prior to
21 going on recording and on the record.

22 And the reason for that is because there is a
23 record that's being created of this proceeding and it's
24 going to be in the form of a transcript. And that's
25 why Ms. Kelley is here. Because she's taking down

1 everything I'm saying.

2 So my job is to ask you questions. My job is
3 not to embarrass you or put you on the spot. I'm just
4 simply here to ask you questions about what you saw,
5 what you heard, what you know that you might be
6 testifying to in preparation for trial.

7 With that in mind, you can answer the
8 questions however you want. It's going to be a
9 question-answer session. I tend to keep it pretty
10 conversational.

11 But in answering the questions, there are
12 some guidelines that are very helpful for you to keep
13 in mind. Okay?

14 A Okay.

15 Q Okay. Awesome. So the first is that, you
16 know, if you answer a question obviously since you have
17 your video off, I would appreciate it if you answered
18 it verbally.

19 Because I'm not going to be able to see you
20 nod your head or shake your head at this point, right,
21 with the video off and also Ms. Kelley will not be able
22 to see that as well.

23 Can we agree on that?

24 A Absolutely.

25 Q All right. And then the second thing I'm

1 going to ask is, you know, if there's a yes-or-no
2 question, which, you know, happens throughout
3 depositions, please answer out loud yes or no. Because
4 if you say um-hum or hm-hmm, Ms. Kelley may not be able
5 to distinguish whether or not that's a yes or a no and
6 I want to make sure that your answers are very clear
7 for the record. Okay?

8 A Okay.

9 Q All right. So with those things in mind, I'm
10 going to go ahead and start the questioning portion of
11 the deposition.

12 So, Ms. Greene, what city and state do you
13 live in?

14 A Clearwater, Florida.

15 Q All right. And how long have you lived in
16 Clearwater, Florida?

17 A This visit since 2013. I left for a couple
18 years.

19 Q Okay. So, and, you know, you indicated you
20 live here locally. Are you employed?

21 A Yes.

22 Q Okay. Where do you work?

23 A Tampa Bay Veterinary Specialists.

24 Q How long have you been working for Tampa Bay
25 Veterinary Specialists?

1 A Five years.

2 Q What is your position with Tampa Bay
3 Veterinary Specialists?

4 A Administrative assistant.

5 Q Okay. And so what are your duties as an
6 administrative assistant?

7 A They're varied. But mostly it's assisting
8 Jennifer, which is our practice administrator. I will
9 check on paying bills, work on IT tickets for
10 corporate, facility tickets with corporate, odds and
11 ends and different things, projects that are going on
12 that need to be seen. Lot of times they're individual
13 things. So it's kind of, like, a one-time thing.

14 Q Okay. Understood. And as far as, you know,
15 your office, right, like, where is your office located?

16 A My office is in Suite 2 of Building B.

17 Q Okay. And is the physical address 1501 South
18 Belcher?

19 A Yes.

20 Q Okay. So you are in Building 2 Suite B,
21 right?

22 A Building B Suite 2.

23 Q Okay, I confused those up.

24 A Yes.

25 Q So Building B Suite 2.

1 A Yes.

2 Q All right. So I want to rewind the clock
3 back to 2021 -- or actually 2023. So March of 2023.

4 A Okay.

5 Q During this particular period in time, did
6 you know of or were you familiar with a law firm that
7 operated on the -- in the general area of where your
8 office is located?

9 A Yes.

10 Q All right. And do you recall or do you know
11 of the physical address of this particular law firm?

12 A They are at 1501 Belcher Road South and they
13 are Building B Suite 6.

14 Q Okay. So Building B Suite 6. And was this
15 law firm known to you as Blanchard Law?

16 A Yes.

17 Q All right. And so you both worked
18 essentially, you know, in the same general space but
19 across from each other. Is that fair to say?

20 A Yes. Different parts of the building.

21 Q Right.

22 A So I didn't see them very often. So, yeah.

23 Q Okay. Different parts of the same building.

24 A Correct.

25 Q All right. And so you said you didn't see

1 them very often. So, you know, like, how familiar were
2 you with the firm or the employees who worked at the
3 firm?

4 A Not very.

5 Q Okay. So you didn't really know, like, who
6 worked there or who owned the firm? You didn't have
7 any, like, familiar or any close relationship with any
8 of those individuals?

9 A No, ma'am.

10 Q Okay. And, you know, during your time at the
11 Tampa Bay Veterinary Specialists, and I'm just talking
12 about, you know, like this March 2023 period, you know,
13 of the year 2023, maybe leading up to that time period,
14 so maybe 2022, you know, did you have the occasion to
15 cross, you know, paths with individuals in the firm
16 like by going over to that side of the building and
17 going to the office?

18 A Occasionally, yes.

19 Q Okay. And so in, like, what -- what was the
20 nature of, like, those interactions? Like, why would
21 you cross over to that side?

22 A There is a glass door that is next to the law
23 firm that has an atrium area and we would walk out that
24 door to get to the main -- our main Building A.
25 Because there was another door there. So it was just

1 kind of the pass through for us to get through to get
2 to our main building.

3 Q Okay. So it was like a shared atrium?

4 A Correct.

5 Q Okay. It might be helpful at this point to
6 kind of just give me a general layout of the building
7 as you recall it in March of 2023 when Blanchard Law
8 was there.

9 A So --

10 Q If you know.

11 A -- our suite is in -- and I apologize, the
12 directional I do have on -- is on basically one corner
13 of the building and Blanchard Law was on the
14 catty-corner of the other building.

15 So to get out of our suite, we would walk
16 down a long hallway, make a turn out, and then there
17 would be another hallway where the restrooms are.

18 There is a door right in front of the men's
19 restroom, we would walk out and that would take us into
20 the atrium and out the door to our building.

21 Q Okay.

22 A Does that make sense?

23 Q Okay. That makes sense. And did you have a
24 parking lot where, you know, employees would park their
25 cars, like, for both buildings or were there separate

1 parking lots?

2 A It's all one parking lot. So there's not a
3 division in them.

4 Q Okay. Understood. So I want to take you
5 back to specifically March 21st of 2023. Do you
6 remember that day?

7 A Yes.

8 Q All right. So tell me generally, you know,
9 what you recall from that day as far as, you know, did
10 you work, what time did you arrive, and kind of just
11 walk me through that.

12 A Okay. That would have -- I would have gotten
13 to work around 7:00 a.m., which is my typical. Until
14 the police were called it was pretty much a typical
15 day. I was probably back and forth between our
16 building and -- between the two buildings, Building A
17 and Building B several times in the morning.

18 What exactly I was doing that day I could not
19 tell you. The only thing I remember from that morning
20 was that at one point I came through and there was a
21 very strong bleach smell.

22 Beyond that there's nothing else that kind of
23 stands out until the police came.

24 Q So how do you typically enter your office
25 building to start your day?

1 A We have an outside entrance for Suite 2. So
2 I start my day coming in through that entrance.

3 Q Okay. And was there anything out of the
4 ordinary, you know, as you were arriving, like,
5 anything -- any door unlocked or anything that just
6 seemed amiss or suspicious?

7 A Not that I recall.

8 Q Okay. And at some -- you said you were back
9 and forth between the buildings. So were you using the
10 atrium door to get back and forth between the buildings
11 or crossing outside?

12 A Through the atrium.

13 Q Through the atrium. Okay. And so you
14 indicated you don't recall exactly what you were doing.

15 But at some point that morning when you were
16 using, I'm assuming, the atrium door you noted a smell
17 of bleach. Is that fair to say?

18 A Yes.

19 Q Okay. So tell me more about that. Like, did
20 you know where that smell of bleach was coming from?

21 A No, I did not. I just knew I smelled it very
22 heavily.

23 Q And when you smelled this odor of bleach, did
24 you, like, let anybody know, you know, like the
25 facilities manager or anybody, about this smell of

1 bleach?

2 A No.

3 Q Okay. And I'm just gonna ask. I know that I
4 probably know the answer to this question. But at what
5 point in the morning did you note the odor of bleach?

6 A I cannot remember what time it was.

7 Q Okay. So you walk through once, you know,
8 you noticed this odor of bleach. Like, did you just
9 kind of continue on throughout your -- like continue
10 through your day or did you, you know, stop and, you
11 know, talk to anybody about this odor of bleach?

12 A No, I did not.

13 Q Okay. So you just continued through your
14 day?

15 A Correct.

16 Q All right. So did that involve, you know,
17 going back to your office building at some point or did
18 you remain in the building next door?

19 A I smelled the bleach when I was on the way
20 back to my office in Building B Suite 2. So I don't
21 recall if I left my office to go back to Building A
22 after that or not.

23 Q Okay.

24 A I can't remember if I did or not.

25 Q So, you know, you mentioned the police being

1 called. Like, what do you recall about that? Like, at
2 what point was the police called?

3 A I am not the one who called. I just knew
4 someone in my building had said that Stephen Cozzi was
5 missing and the police had been called and they were
6 investigating. And I do not remember what time that
7 was.

8 Q Did you know Stephen Cozzi personally?

9 A No, just in passing a few times.

10 Q Okay. So you knew of him and it was a
11 very -- you know, essentially -- so you knew of
12 Mr. Cozzi. Is that fair to say?

13 A Correct.

14 Q But it was essentially an interaction where
15 you said hello and he said hello and that was pretty
16 much it, just cordial?

17 A Yes.

18 Q Okay. Did you know if Mr. Cozzi worked for
19 Blanchard Law back in March of 2023?

20 A Yes.

21 Q Okay. And so do you -- who told you about
22 the circumstances surrounding the police you called?

23 A I cannot recall.

24 Q So once the police were called, did you have,
25 you know, the opportunity to speak with law

1 enforcement?

2 A Yes.

3 Q All right. Tell me about that. You know,
4 were you approached in your office? You know, did you
5 meet them over in the atrium area in Building A?

6 A I do not recall where we first met. I know
7 that they had been in our suite. So it could have been
8 them coming to our suite or I could have walked out
9 there. But I do not recall which one it was.

10 Q Okay. And do you recall, you know, what was
11 discussed with police on this particular day,
12 March 21st of 2023?

13 A I believe we discussed that there was an
14 incident the week before that was called in to the
15 nonemergency.

16 Q Okay. And that's what I want to --

17 A I think that's -- that incident report is
18 most of what we discussed. But I can't recall beyond
19 that.

20 Q Thank you. That's what I want to hone in on.
21 I just want to make sure you remembered it.

22 So for the incident on March 14 of 2023 -- so
23 now we're going to turn back the clock a little bit,
24 right, one week.

25 A Okay.

1 Q This particular incident was discussed with
2 law enforcement according to your recollection on March
3 21st, 2023. How did that come up in the discussion?

4 A I don't remember how it came up in the
5 discussion.

6 Q Okay. So --

7 A I mean, yeah, I don't remember exactly how it
8 came up. I just know it came up.

9 Q Okay. And so tell me about that day,
10 March 14th of 2023. Like, what incident are you
11 referring to?

12 A So our facilities lady, Deborah, had come to
13 me because she said when she walked into the electrical
14 closet in Building B she come across a gentleman in the
15 electrical closet with the lights off and when she
16 asked him what was going on he just said something
17 about the power was off or something along those lines
18 and just kind of hurried past her and walked out to his
19 car.

20 She was concerned about it. It seemed weird
21 to us. So we just thought we would go ahead and call
22 the police and just put in a police incident report
23 just in case. Because nobody else -- once we found out
24 nobody else in the building knew anything about them
25 coming in for work we called it into the police.

1 Q Okay. And so when did this incident happen
2 with the facilities manager and this unidentified
3 individual in the electrical closet? Like, at what
4 point in the day?

5 A It was in the morning. I want to say kind of
6 maybe mid morning. I want to say if I remember
7 correctly somewhere between 9:00 and 10:00 in the
8 morning.

9 Q Okay. And when was the incident reported to
10 the police?

11 A It was a couple -- several hours later. I
12 want to say maybe 1:00 or 2:00, something along those
13 lines.

14 Q Okay. And in speaking -- did you speak with
15 the facilities manager, Deborah, you know, to get
16 details about the incident?

17 A Yes.

18 Q Okay. Did she approach you? Did you
19 approach her?

20 A She approached me to give me the information.

21 Q Okay. And so as far as the information's
22 concerned, like, did she provide a description of the
23 individual to your knowledge?

24 A Yes, she did.

25 Q Okay. Do you recall what that description

1 was?

2 A She said it was a gentleman with a paper mask
3 on, jeans with a loose T-shirt. I think that might
4 have been all that she gave me for description. I
5 would have to look at the email I sent in regards to it
6 for anything else.

7 Q Okay. And as far as the, you know, the --
8 her interaction with the gentleman, you indicated that,
9 you know, when asked what he was doing he said
10 something about a power outage and left immediately.
11 Is that fair?

12 A That is what Deborah told me.

13 Q Okay. So did Deborah tell you anything else?
14 Like, where the gentleman went or, you know --

15 A She said he walked out to his truck. Said he
16 had a Tundra truck with a yellow license plate. She
17 was trying to get the license plate number and couldn't
18 get it. And he was backed into a parking space that's
19 kind of between the two buildings.

20 Q Okay. So based on the information that she
21 gave you, like, what was the next step that you took in
22 handling the incident?

23 A I checked -- between Deb and I we checked the
24 other tenants to make sure that they hadn't called for
25 something and/or -- and we reached out to our landlord

1 to make sure he didn't send somebody that we weren't
2 aware of.

3 Once we heard back from everybody, that's
4 when I called it into the nonemergency police line.

5 Q Okay. And what did these other parties say
6 as far as, like, having somebody do work in the
7 building? Like, what did they tell you?

8 A They just said, no, they had not had anybody
9 in working.

10 Q Okay. So then once you received that
11 information, that's when you made the decision to reach
12 out to law enforcement?

13 A Yes.

14 Q Okay. And so once -- when you reached out to
15 law enforcement, like what agency did you reach out to?

16 A Clearwater Police or Largo Police. It was
17 probably Largo Police.

18 Q Okay. And were you the person that made that
19 phone call?

20 A Yes, I am.

21 Q All right. So you provided details about the
22 incident?

23 A Correct.

24 Q Did anybody come out to speak with you on
25 this particular day, March 14th of 2023, about the

1 incident?

2 A Nobody came on site.

3 Q Okay. So there was -- so nobody, like, came
4 to talk to you or take a report?

5 A They did not come on site. I got a phone
6 call.

7 Q Okay. So what was the nature of that phone
8 call? Like, did they take down, you know, details
9 about the incident or tell you they were going to write
10 a report or anything?

11 A So it was -- I don't know if he was an
12 officer or not, but the last name was Fisher I believe.
13 We just -- the details of the incident we just
14 discussed and they just pretty much said that since
15 there was no damage to the building or nothing stolen
16 that we could figure out at this time they were just
17 pretty much leaving it at that and if we saw somebody
18 else to call 911 if we found somebody suspicious.

19 Q Okay. Did anybody come, like, the next day
20 or, you know, any day that week to follow up with you
21 or was that pretty much the extent of the interaction
22 you had with law enforcement about this incident?

23 A That was the extent of it.

24 Q Okay. As far as the electrical closet is
25 concerned, do you -- like, where is that located in

1 relation to, you know, like your office and also
2 Blanchard Law, if you recall?

3 A The electrical closet is -- if Blanchard Law
4 is the front of the building -- sorry, this is the best
5 way for me to do it -- our office is on the back end of
6 the office catty-corner on the opposite side of the
7 building.

8 The electrical closet is on the back side of
9 the building almost center. There is -- to get to the
10 electrical closet from our Suite 2 you would have to
11 walk through our hallway, the hallway down the
12 bathroom, turn right, go down that hallway, and it's
13 down there next to Suite Number 4.

14 The hallway that you get down to get to Suite
15 4 and 5 and the electrical closet there is a door to
16 Suite 6 where Blanchard Law is.

17 So Blanchard Law was much closer to the
18 electrical closet than we were.

19 Q Okay. This electrical closet, was it, you
20 know, secured in any kind of way or was it left
21 unsecured back in March of 2023?

22 A There was no lock on it.

23 Q So it was always left unsecured?

24 A Yes.

25 Q Okay. And you indicated, you know, when you

1 had reported the incident that there was nothing taken
2 and there was no damage?

3 A Nothing we could find, no.

4 Q Okay. Did you go and -- like actually go and
5 check things out in the electrical closet when Deborah
6 reported this incident to you?

7 A Yes.

8 Q Okay, tell me about that.

9 A We walked in there. We did not see any
10 obvious damage that we could find because we -- I think
11 it had recently had things removed and taken out. So
12 it was pretty empty. The only thing we found is there
13 was an extra box in there which appeared to be a little
14 wagon boxed up inside of there that we weren't sure who
15 it belonged to.

16 Q And where was this box located?

17 A It was inside the electrical closet. There
18 are -- the electrical closet has stairs leading up to
19 the roof and it was between those stairs and there's
20 like a built-in low shelving unit in there. And it was
21 between the stairs and that shelving unit.

22 Q Okay. And you indicated that there was a
23 tote or a wagon inside this box. How did you, like,
24 come to find that out?

25 A When I opened the -- the front flap was open.

1 You could see the wheels and kind of the matrix inside
2 of it. I had seen those kind of wagons before folded
3 up. So I did not pull it out of the box. But that's
4 what it looked like to me because that's what I have
5 seen them look like before.

6 Q Did you open the box or did someone else open
7 the box?

8 A Someone else opened the box.

9 Q And so, you know, based on what you were
10 seeing, like, what color was the tote or the wagon
11 inside the box?

12 A I do not recall.

13 Q Do you recall what brand it was?

14 A No. Not off the top of my head. If I had
15 said something at the time, that would be it. But I do
16 not -- at this point I do not recall.

17 Q And so, you know, upon making this discover
18 inside the electrical closet, like what did y'all do
19 with the box with the tote in it?

20 A We left it there because we were not sure if
21 it belonged to one of the other tenants. So we left it
22 there so we weren't taking off with their stuff.

23 Q Okay. So as far as, you know -- based on
24 your familiarity with the building and the location of
25 the building, you know, to your knowledge, was there an

1 issue with homeless people with carts like loitering
2 around the property back in March of 2023?

3 A I don't recall. That's probably gonna be
4 more of a question for Jennifer. Because she's the one
5 that would have been doing those reports.

6 Q Jennifer who?

7 A Jennifer Mordenga, our practice hospital
8 administrator.

9 Q Okay. And, to your knowledge, Ms. Greene, is
10 it common to have pets in crates or wagons transported
11 around the property?

12 A Not that I recall. No.

13 Q Okay. So I wanted to go ahead and share
14 screen, you know, to give you a chance to look at the
15 email that was sent. When did you send the email in
16 relation to, like, when the incident was reported?

17 A Talking about on the 14th?

18 Q That's right.

19 A I want to say it was around 2:00. Maybe a
20 little after.

21 Q All right. Just let me know once, you know,
22 you have a chance to see it if this is the email that
23 you sent.

24 A Yes, that is the email I sent.

25 Q All right. And so is this email -- and just

1 to kind of give it some context for the record. I
2 pulled up an email from a christina.greene@
3 thrivepet.com and the title or heading of the email
4 indicates 2300017743 police incident report from
5 3/14/23 and then there's like a dash and then it says
6 electrical closet in Building B.

7 Is that fair, like, as far as the heading of
8 the email that you put on there?

9 A Yes.

10 Q Okay. And so is christina.greene@
11 thrivepet.com your email?

12 A Yes.

13 Q Okay. And then there's also several
14 individuals that are cc'ed on the email. Which your
15 timing was accurate, Ms. Greene, because it indicates
16 that it was sent on Tuesday, March 14th, 2023, at 2:02
17 p.m. Is that fair to say?

18 A Yes.

19 Q Okay. And one of the individuals I want to
20 hone in on is Deborah Henrichs. And the email that I
21 see here it's deborah.henrichs@thrivepet.com.

22 Is that Deborah the facilities manager's
23 email that we've been referring to this whole time?

24 A Yes.

25 Q Okay. And the reason why I'm asking is

1 because, you know, you indicate the first sentence of
2 your email, and I'll read it very slow for the court
3 reporter, "As I think all of you are already aware, we
4 had an incident where Deb found someone in the
5 electrical closet this morning", period. "From my
6 understanding, this is what happened", period. "I
7 copied Deb on this email. So please let me know if any
8 of this is incorrect."

9 So you copied Ms. Henrichs on the email so
10 that she could provide any details or, like, correct
11 anything that you reported in the email. Is that fair
12 to say?

13 A Yes.

14 Q Okay. And did Ms. Henrichs respond and say,
15 hey, this is wrong or, hey, this is incorrect or I'd
16 like to add something to your account as you reported
17 it in your email?

18 A She did not reply to the email. But I saw
19 her later and she said she read it and everything on
20 there was correct.

21 Q Okay. And specifically, right, the part
22 where you report the incident is actually the next
23 paragraph, right, and that's based on the information
24 that Ms. Henrichs relayed to you, right?

25 A Correct.

1 Q Okay. And you also indicated at the bottom
2 that you would let everyone know once you have an
3 update. Was there any updates, you know, after this
4 email was sent, like any update emails?

5 A I think there was because I did send an
6 update. And it was basically that I talked to Officer
7 Fisher about the incident and that's where he had told
8 me that there was no damage to the building or anything
9 stolen, that, you know, that there wasn't much that
10 they could do and if we discovered something later we
11 should call them back and let them know if we found
12 something broken or missing and/or if we found somebody
13 loitering around that we were concerned about to call
14 911.

15 Q Okay. I'm gonna stop sharing.

16 Okay. So I'd like to now fast forward back
17 to March 2021 -- March 21st of 2023 so the record is
18 clear what date I'm talking about and ask you one
19 question about this particular day.

20 So this tote that we've been discussing,
21 right, at some point -- so let me back up a minute. So
22 the tote you indicated was left in the electrical
23 closet. Right?

24 A Yes.

25 Q Okay. And you believe the tote was in the

1 building until March 21st of 2023. Correct?

2 A As far as I'm aware of, yes.

3 Q Okay. When on March 21st of 2023 did you
4 notice a tote was no longer in the closet?

5 A I do not recall.

6 Q Okay. But at some point you noticed that it
7 was no longer in the closet on March 21st of 2023?

8 A I think I was told that it was no longer
9 there. I don't think I actually went to the closet and
10 saw it. Because the police were there by that time.

11 Q Okay. So who told you that the tote was no
12 longer in the closet?

13 A I do not recall.

14 Q Okay. All right, I'd like to fast forward
15 another week to March 28th of 2023. Do you recall that
16 day?

17 A No.

18 Q Okay. That's fair. So do you recall writing
19 a statement for law enforcement at some point during
20 this investigation?

21 A Yes.

22 Q Okay. And I know you just said you don't
23 recall that particular day. But do you recall when you
24 gave the statement, like the written statement to law
25 enforcement?

1 A I recall getting the statement. I don't
2 remember, like, when, like time, things happened.

3 Q Yes, ma'am, I understand. So I'm going to go
4 ahead and share screen again.

5 Does this written statement look familiar to
6 you, Ms. Greene?

7 A Yes.

8 Q Okay. And I'll just scroll through the whole
9 thing so you have a chance to see it. Is that a fair
10 and accurate representation of the written statement
11 that you gave on -- the date on here is March 28th of
12 2023?

13 A Yes.

14 Q Okay. And for context again for the record,
15 I'm referring to Largo Police Department Statement
16 Form. There's a case number on it, 23-002583. The
17 date is March 28th of '23. And the name on the written
18 statement and handwriting is Christina Greene.

19 That's your name, right, ma'am?

20 A Yes.

21 Q Okay. And your date of birth is 8/24/1972?

22 A Correct.

23 Q Okay. And the signature on the bottom, it
24 says signature of person making the statement right
25 here. At the bottom of the statement that's your

1 signature?

2 A Yes.

3 Q Okay. All right. So I know, like, you don't
4 have an independent recollection but you do -- this
5 statement is familiar to you and this is the statement
6 that you made. Right?

7 A Yes.

8 Q Okay. Did you have any other interaction
9 with law enforcement after March 27th of 2023?

10 A Not that I recall. Unless it was just them
11 calling to get ahold of Deborah or something along
12 those lines. Which -- yeah, no.

13 Q Okay. I'm going to stop share again.

14 All right. And so you -- like as far as
15 you're concerned, right, like, you didn't have any
16 additional, like, follow-up interviews or sit-down
17 interviews, like, with any detectives or members of law
18 enforcement in relation to this case after March --

19 A No.

20 Q -- 2023?

21 A No.

22 Q Okay. Did you discuss the case with anybody,
23 like whether it was at Tampa Bay Veterinary Specialists
24 or, you know, Debra Henrichs, the facilities manager,
25 or anyone else, you know, since all of this has

1 transpired?

2 A It has been mentioned, but nothing with
3 specifics.

4 Q Okay. Were you aware that an arrest was made
5 in the case for example?

6 A I heard someone -- someone told me that there
7 was an arrest made.

8 Q Who told you that?

9 A I do not recall except it was somebody from
10 work.

11 Q Okay. Other than that, was there anything
12 else that, you know, you became aware of or was
13 discussed between you and employees of Tampa Bay
14 Veterinary Specialists or you and employees that work
15 in the office building in general?

16 A I don't think so. Not that I recall.

17 Q Okay.

18 MS. RAMOS WICKS: I don't have any further
19 questions. I'm going to check in with
20 Mr. Vonderheide and see if he has any questions.

21 MR. VONDERHEIDE: I have no questions.

22 Thank you, Ms. Greene.

23 THE WITNESS: Okay.

24 MS. RAMOS WICKS: All right. So, Ms. Greene,
25 I'm gonna stop the recording because I have a

1 question that I just don't want it to be on the
2 record. Okay?

3 THE WITNESS: Okay.

4 MS. RAMOS WICKS: All right. So the next
5 part before you go is I have to ask if you would
6 like to read or waive a reading of your
7 deposition.

8 So essentially what that means is you have,
9 you know, the opportunity to look at a sneak --
10 take a sneak peak at your deposition and actually
11 read a copy of your deposition to check for any
12 errors in the transcription.

13 Those errors would be placed on what's called
14 an Errata Sheet. It doesn't change the
15 deposition. But it would give you an opportunity
16 to review the deposition, you know, prior to a
17 transcript actually being issued.

18 So you can choose to read your deposition or
19 you can choose to waive a reading. I just want to
20 let you know though that if you waive the reading
21 that doesn't mean you're never going to see the
22 transcript.

23 I'm absolutely certain that Mr. Vonderheide
24 is gonna provide you a copy of the transcript in
25 preparation for your trial testimony.

1 So would you like to read or waive?

2 THE WITNESS: If I'm reading, would I have to
3 read right now?

4 MS. RAMOS WICKS: No. You're just gonna
5 provide your email. Which is why I took us off of
6 the recording.

7 THE WITNESS: Right.

8 MS. RAMOS WICKS: Yeah. Just gonna provide
9 your email and then Ms. Kelley's gonna send you a
10 copy of the transcript so that you can read it.

11 THE WITNESS: If I could read it, that would
12 be great.

13 (The deposition was concluded at 1:14 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: AUGUST 1, 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.


CHRISTINA GREENE

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF POLK)

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

WITNESS my hand and official seal this 12th
day of December 2024.


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 CHRISTINA GREENE, that a view of the transcript was
9 requested and that the transcript is a true and complete
10 record of my 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 12th day of December 2024.

18
19 

20
21 TAMMY KELLEY
22
23
24
25

December 12, 2024

Ms. Christina Greene
christina.greene@thrivepet.com

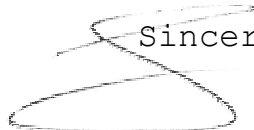
Dear Ms. Greene:

Your deposition taken in State of Florida versus Tomasz Kosowski on August 1, 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 black ink, appearing to be 'Tammy Kelley', written over the word 'Sincerely,'.

Tammy Kelley