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: MAJOR SCOTT GORE

DATE TAKEN: June 12, 2024

TIME: 9:38 a.m. to 9:49 a.m.

PLACE: Via Zoom videoconference

STENOGRAPHICALLY REPORTED BY:
Lori A. Seiden, RPR, FPR-C
Notary Public, State of Florida at Large

Verbatim Court Reporting, Inc. 728 S. New York Avenue, Lakeland, FL 33815 863-500-3603

```
Page 2
 1
     APPEARANCES:
     (Appearing via Zoom videoconference)
 2
     NATHAN T. VONDERHEIDE, ESQUIRE
 3
     eservice@flsa6.gov
         Office of the State Attorney
 4
         County Justice Center, 14250 49th Street North
         Clearwater, Florida 33762
         (727) 464-6221
 5
 6
              Appearing on Behalf of the Plaintiff
 7
 8
     BJORN E. BRUNVAND, ESQUIRE
     bjorn@acquitter.com
 9
         Brunvand Wise, P.A.
         502 East Tyler Street
10
         Tampa, Florida 33602
         (813) 970-0000
11
              Appearing on Behalf of the Defendant
12
13
14
15
16
17
18
19
20
21
22
23
24
25
```

			Page 3
1	CONTENTS		
2			
3	TESTIMONY OF MAJOR SCOTT GORE	PAGE	
4	DIRECT EXAMINATION BY MR. BRUNVAND	4	
5			
6	CERTIFICATE OF OATH	14	
7	CERTIFICATE OF REPORTER	15	
8	EXHIBITS	NONE	
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

- 1 The deposition of MAJOR SCOTT GORE was taken
- 2 pursuant to notice by counsel for the Defendant on the
- 3 12th day of June, 2024, commencing at 9:38 a.m., via
- 4 Zoom videoconference. Said deposition was
- 5 stenographically reported by Lori A. Seiden, RPR,
- 6 FPR-C, Notary Public, State of Florida at Large.
- 7 - - -
- 8 MAJOR SCOTT GORE,
- 9 a witness, having been duly sworn to tell the truth,
- 10 was examined and testified upon his oath as follows:
- 11 THE WITNESS: I do.
- 12 DIRECT EXAMINATION
- 13 BY MR. BRUNVAND:
- 14 Q. We've been recording these depositions. Are
- 15 you okay with us recording the deposition?
- 16 A. That's fine.
- 17 Q. Okay. Let me go ahead and start that. My name
- 18 is Bjorn Brunvand. I represent Tom Kosowski.
- 19 Could you please state your full name?
- 20 A. Scott Gore, G-o-r-e.
- 21 Q. And how are you employed?
- 22 A. I'm employed with the Largo Police Department.
- Q. What is your current rank with the Largo Police
- 24 Department?
- 25 A. I'm the major of operations.

- 1 Q. And how long have you been with Largo Police
- 2 Department?
- 3 A. Since August 9th of 1999.
- 4 Q. Did you prepare any reports detailing your
- 5 involvement in this case?
- 6 A. No, sir.
- 7 Q. All right. What was your involvement in this
- 8 case?
- 9 A. Part of my duties as the major of operations, I
- 10 oversee the investigator services division as one of the
- 11 divisions that falls under my command. So it's run by a
- 12 lieutenant. At the time, it was Lieutenant Lomonaco.
- 13 She was the lieutenant who ran investigative services
- 14 division, so I'm the person in Lieutenant Lomonaco's
- 15 chain of command.
- 16 Q. Specifically, do you recall having a role in
- 17 this particular investigation?
- 18 A. No. My role isn't really to be involved in the
- 19 investigation. I'm just a command presence. So in this
- 20 particular investigation, I know they went to execute a
- 21 search warrant at the residence. I'm also in charge of
- 22 our SWAT team. So I go out to pretty much anything that
- 23 our SWAT teams would be involved in.
- In this case, we utilized Tarpon Springs Police
- 25 Department SWAT team to execute this warrant. So I just

- 1 went to the scene as a commander to make sure that
- 2 everything went smoothly, nobody was injured, everybody
- 3 was safe. I had no role in the actual execution of it.
- 4 Q. Do you recall when you -- well, let me ask you
- 5 this: Before you arrived at the scene, did you stop
- 6 anywhere elsewhere? Maybe there was a debriefing taking
- 7 place in preparation for the search warrant.
- 8 A. They had a command post out in the area.
- 9 Q. Right.
- 10 A. I think a command bus was out there.
- 11 Q. Did you go there?
- 12 A. To the command bus? Yes, sir.
- 13 Q. Okay. And were you present for any debriefings
- 14 that took place?
- 15 A. No. People were kind of scattered. There were
- 16 different people doing different jobs. I basically made
- 17 contact with Lieutenant Lomonaco. And basically I was
- 18 coordinating between, I believe, Major Trill, at the
- 19 time, from Tarpon Springs, just making sure he didn't
- 20 need anything specific from us. That was really my
- 21 involvement with it.
- 22 Q. Okay. When you arrived at the home at
- 23 511 Seaview, was it your understanding that it was
- 24 anticipated that no one would be home at that location?
- 25 A. Yeah. I believe, if I remember correctly, they

- 1 did not anticipate anybody being inside the residence at
- 2 the time.
- 3 Q. Okay. Did you know who the owner was of the
- 4 property?
- 5 A. I don't know that I ever checked. I know that
- 6 they said that was the defendant in the case was the
- 7 reason they were there. I don't know I ever verified,
- 8 actually, the owner of the property.
- 9 Q. Okay. When you say "the defendant in the
- 10 case," do you know what his status was at the time of
- 11 the search warrant?
- 12 A. Status as far as I know he was a person of
- 13 interest in the investigation.
- 14 Q. Okay. All right. Do you know if he was
- 15 anything beyond a person of interest at that time?
- 16 A. I can't say that I do. Again, I didn't really
- 17 attend any briefings. That would have been Lomonaco and
- 18 her team doing that.
- 19 Q. Okay. So do you arrive at the scene prior to
- 20 the SWAT team actually entering the house?
- 21 A. Yeah, I was probably at the scene. I know at
- 22 the time we were waiting, I believe, on the warrant to
- 23 be signed and be prepared to be executed. So I think I
- 24 was there probably an hour or two. Probably two as a
- 25 rough estimate.

- 1 Q. Okay. Did you witness anyone from law
- 2 enforcement entering the property, going onto the
- 3 property, prior to the SWAT team entering the property?
- 4 A. I did not.
- 5 Q. Okay. As a major, do you wear any type of
- 6 recording device?
- 7 A. I do not.
- 8 Q. Okay. During that time period, I know patrol
- 9 had recording devices that they wore.
- 10 Would detectives generally have those recording
- 11 devices as well?
- 12 A. And we're referring to, like, body-worn
- 13 cameras?
- 14 Q. Yes.
- 15 A. No. They typically don't wear those, no, sir.
- 16 It's usually for our uniformed patrol.
- 17 Q. Okay. All right. Do they have the option of
- 18 wearing those, or not really?
- 19 A. I would have to look at our policy manual, to
- 20 be honest with you. I would believe they would have
- 21 them issued to them because they can always rotate
- 22 investigations back to patrol for off-duty details and
- 23 they put on a uniform, but they're not required as part
- 24 of their duties inside the investigative services
- 25 division.

- 1 Q. Okay. All right. So what was happening
- 2 during -- you said you were there for a couple hours
- 3 possibly before the SWAT team made entry. What was
- 4 happening during that time period?
- 5 A. Detectives were kind of having a bite to eat.
- 6 I think they ordered some food. I was going around and
- 7 just talking to people, seeing how they were doing. I
- 8 don't get to get out and see everybody on a regular
- 9 basis. A lot of talk about family, their work. I know
- 10 they had put in a lot of hours. They were working a lot
- 11 of hours, obviously. It was a fairly significant case.
- 12 So just checking in with people, walking around, seeing
- 13 how everybody is doing and coordinating again with Major
- 14 Trill from Tarpon.
- 15 Q. Okay. And this is all taking place on the
- 16 street in front of the house, or...
- 17 A. If I remember correctly, the house is on the
- 18 water.
- 19 Q. Right.
- 20 A. And I think the road kind of is a U-shaped
- 21 road. And I think the road directly in front of the
- 22 house, the command bus was around the corner around the
- 23 U-shaped road within line of sight, but not directly in
- 24 front of the home.
- Q. Okay. Were you guys waiting for the search

- 1 warrant to be signed by the judge, or what was -- what
- 2 were you guys waiting for?
- 3 A. I believe we were there kind of waiting for
- 4 that. Once we had the warrant, they were waiting on
- 5 Tarpon SWAT team to assemble and meet us at the kind of
- 6 rally location.
- 7 Q. Okay. Do you know as far as when the search
- 8 warrant affidavit is uploaded for the Court's
- 9 consideration, do you know whether or not there's some
- 10 sort of a timestamp that would tell us exactly when it
- 11 was uploaded?
- 12 A. I don't know, sir. I think they just clock in
- 13 on them now. That's after my time. I left
- 14 investigative divisions services back in 2012, so...
- 15 Q. Okay. So you're not familiar with CloudGavel?
- 16 A. No, sir.
- 17 Q. All right. Maybe Detective Bolton can
- 18 enlighten us on that.
- 19 So once the SWAT team arrived, do you recall
- 20 what time that was?
- 21 A. I don't, sir.
- Q. Okay. Did you witness them enter the house?
- 23 A. I was out on the road, kind of out in front of
- 24 the command bus when they actually executed it -- the
- 25 warrant. I mean, I saw the team and kind of heard it,

- 1 but --
- 2 Q. Not really?
- 3 A. -- from that standpoint, but it was from a
- 4 distance.
- 5 Q. All right. Do you know how they entered the
- 6 house initially?
- 7 A. I'll be honest with you, I really don't. I
- 8 know the team typically will go in from -- they'll
- 9 surround the house, kind of have a team in the rear and
- 10 a team in the front. I don't remember specifically how
- 11 they entered that house.
- 12 Q. Okay. All right. Once the house had been
- 13 cleared, you weren't part of going into the house.
- 14 A. No. I never entered the home, no.
- 15 Q. Okay. Once it was cleared, do you recall
- 16 whether or not the search warrant was read aloud by
- 17 someone from law enforcement?
- 18 A. I don't know that, sir. Again, I watched it
- 19 from a distance.
- Q. When you say "from a distance," you're where
- 21 the support vehicle is?
- 22 A. Yeah, the command post. We basically have a
- 23 mobile command vehicle that was out there, yes, sir.
- Q. That's like a big RV bus type of --
- 25 A. Yeah. Kind of like a bus, yeah.

- 1 Q. Okay. And would you estimate the distance down
- 2 the road that the bus was from the house? Talking about
- 3 a couple hundred feet?
- A. Yeah, give or take a couple hundred feet, I
- 5 would estimate.
- 6 Q. Okay. All right. So when the search starts,
- 7 do you recall how they entered the house at that time,
- 8 or you're not present for that either?
- 9 A. I mean, once the team did their initial entry
- 10 and they cleared it, I was only on scene for a short
- 11 time after. I was basically there to make sure that
- 12 everything coordinated with Tarpon, it all went safely,
- 13 and there were no injuries, no -- nothing that I had to
- 14 notify, you know, the chief of. And after that I wasn't
- 15 on scene for very long.
- 16 Q. Okay. Did you have any other involvement in
- 17 this case other than what we just discussed?
- 18 A. No, sir.
- MR. BRUNVAND: Okay. I don't have any other
- 20 questions.
- 21 Nathan, do you have any questions?
- MR. VONDERHEIDE: No questions from me.
- MR. BRUNVAND: You want to read or waive,
- 24 Major?
- 25 THE WITNESS: I'll waive.

```
Page 13
                (At 9:49 a.m., no further questions were
 1
 2
          propounded to this witness.)
 3
 4
 5
 6
 7
 8
 9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
```

		Page 14
1	CERTIFICATE OF OATH	
2		
3	STATE OF FLORIDA	
4	COUNTY OF PINELLAS	
5		
6	I, Lori A. Seiden, RPR, FPR-C, Notary Public,	
7	State of Florida, certify that MAJOR SCOTT	
8	GORE virtually appeared before me on the 12th day of	
9	June, 2024, and was duly sworn.	
10		
11	WITNESS my hand this 5th day of January, 2025.	
12		
13	Lori a Leiden	
14	Lori A. Seiden, RPR, FPR-C	
15	Notary Public - State of Florida	
16	My Commission No.: HH 226917	
17	My Commission Expires: June 6, 2026	
18		
19		
20		
21		
22		
23		
24		
25		