

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: DEBRA HEINRICHS

DATE TAKEN: July 12, 2024

TIME: 11:00 a.m. to 11:53 a.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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EXHIBITS	NONE

1 The deposition of DEBRA HEINRICHS was taken
2 pursuant to notice by counsel for the Defendant on the
3 12th day of July, 2024, commencing at 11:00 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 DEBRA HEINRICHS,
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 MR. BRUNVAND:

14 Q. All right. My name is Bjorn Brunvand. We're
15 here in the matter of State of Florida vs. Tom Kosowski,
16 and to take the deposition. You've been listed as a
17 witness in that case, and that's why we have scheduled
18 your deposition.

19 If you could, please state your full name.

20 A. Debra Heinrichs.

21 Q. And Ms. Heinrich, is it Heinrichs or Heinrich?

22 A. Heinrichs.

23 Q. Heinrichs. I apologize.

24 A. You're okay.

25 Q. So where are you employed?

1 A. ThrivePet.Com. Thrive Pet.

2 Q. What's the name?

3 A. Well, it's Tampa Bay Veterinarian.

4 Q. Okay. And how long have you been employed by
5 them?

6 A. 28 years.

7 Q. Okay. And so, in March of 2022, were you
8 employed there?

9 A. Yes.

10 Q. Okay. Do you know who had access to keys to
11 the outside doors for 1501 Belcher, Building B?

12 A. The attorneys.

13 Q. The attorneys had access to the keys?

14 A. They're the only ones that had them to the
15 main --

16 Q. So during the time period when you were working
17 there, you're indicating that the only people that had
18 access to the keys for the outside doors were the
19 attorneys?

20 A. Individual suites had their outside door, and
21 that was their entry point.

22 Q. Okay. What about the landlord? Did the
23 landlord have keys for all the outside doors?

24 A. I don't know.

25 Q. What about you, yourself? Did you have access

1 to the keys for the outside doors?

2 A. No.

3 Q. So in the areas of the building that were
4 vacant in March of 2023, how would -- how would you
5 enter or exit some of the outside doors to the vacant
6 areas?

7 A. You don't. You don't need to go in there.

8 Q. Okay. So you never did and you never had the
9 need to?

10 A. No.

11 Q. Okay. If someone wanted to look at it and they
12 wanted to access it, how would they go about accessing
13 it, if you know?

14 A. I don't know.

15 Q. All right. What were your duties there in
16 March of 2023?

17 A. Cleaning and maintenance.

18 Q. Cleaning and maintenance. Okay.

19 And so I understand you correctly that even
20 though your duties were cleaning and maintenance, you
21 did not have access to keys for the building at all, or
22 what access did you have?

23 A. To the suite that's rented by Thrive, Suite
24 2-B.

25 Q. Okay. So you only had access to Suite 2-B?

1 A. Right.

2 Q. Okay. You also had access to the utility
3 closet; right?

4 A. Yes.

5 Q. Okay. The utility closet on March 21st, 2021,
6 appeared to not have a lock on the door. Is that
7 accurate?

8 A. Yes.

9 Q. And do you know if there was ever a time during
10 the 28 years that you worked there where there was a
11 lock on that door?

12 A. Sometimes there was, sometimes there wasn't.

13 Q. Okay. When was the most recent time that there
14 was a lock on that door?

15 A. After this situation happened.

16 Q. Okay. What about prior to that? When was the
17 last time there was a lock on that door?

18 A. I don't know.

19 Q. You seem frustrated. Are you frustrated?

20 MR. ALMON: Object to form.

21 BY MR. BRUNVAND:

22 Q. We're just trying to ask some questions and get
23 through this the best we can, so it's nothing personal.

24 So when there was a lock on that particular
25 door, did you have a key to that utility closet?

1 A. No.

2 Q. Okay. Do you know whether or not there were
3 any keys to any of the outside doors that were laying
4 around in the vacant part of the building?

5 A. No.

6 Q. No, you don't know, or no, there was not?

7 A. I did not know.

8 Q. Okay. Was it part of your duties to clean the
9 bathroom in Building B?

10 A. No.

11 Q. Do you know who had that obligation?

12 A. The owner had a cleaning lady.

13 Q. Okay. Do you know the cleaning lady's name?

14 A. I don't remember now.

15 Q. Okay. Do you have any records where you might
16 be able to get that and give it to the prosecutor at
17 some point?

18 A. No, because she died.

19 Q. Okay. I'm sorry to hear that.

20 And do you know how often that was cleaned?

21 A. No.

22 Q. Okay. Do you recall providing a statement to
23 law enforcement on March 14th, reference an unknown
24 individual that you had encountered in the vicinity of
25 that utility closet?

1 A. Yes.

2 Q. Tell us about what you saw on March 14th.

3 A. I'm not clear. What day was that?

4 Q. Well, the day that -- well, the day that you
5 saw this individual that caused you to contact law
6 enforcement. Was that the same day or was it a
7 different day?

8 A. I believe it was the same day.

9 Q. Okay. And was that -- do you recall whether or
10 not that was March 14th, about a week before the March
11 21st date?

12 A. That sounds correct.

13 Q. Do you remember describing the person who you
14 saw to law enforcement on March 14th?

15 A. Yes.

16 Q. Do you recall describing that person as having
17 short brown hair?

18 A. Yes.

19 Q. Do you recall how his hair was styled beyond it
20 being short and brown?

21 A. No.

22 Q. Do you recall whether or not he had any facial
23 hair?

24 A. No.

25 Q. No, you don't recall, or no, he did not have

1 facial hair?

2 A. No.

3 Q. No, you don't recall?

4 A. There is no facial hair.

5 Q. Okay. So you recall that he did not have
6 facial hair?

7 A. Right.

8 Q. Okay. Do you recall testifying in court on
9 July 11th, 2023?

10 A. Yes.

11 Q. Do you recall whether or not on that particular
12 day you were asked about whether or not the individual
13 had facial hair or not?

14 A. No.

15 Q. All right. Do you recall testifying that you
16 were not sure if the man had a goatee during that
17 hearing?

18 A. No.

19 Q. Is it possible that you may have testified to
20 that, that he did not -- that you did not know whether
21 or not he had a goatee or not?

22 A. I don't know.

23 Q. Okay. Would you agree that July 11th, 2023,
24 would be closer in time to March 21st, 2023 and March
25 14th, 2023?

1 A. I don't understand.

2 Q. Well, today is what, July 12th, 2024; right?

3 A. Yes.

4 Q. Okay. Would you agree that a year ago on July
5 11th, 2023, that that was closer in time to the time
6 that you observed the things that you reported to law
7 enforcement?

8 A. I don't know what you mean by this question.

9 Q. Can we agree that July 11, 2023 was about four
10 months after March 2023?

11 A. Yes.

12 Q. And can we agree that today is about 16 months
13 after March of 2023?

14 A. Yes.

15 Q. Okay. The person that you had seen in the
16 building on or about March 14th, 2023, what else can you
17 tell us about that person? You indicated that he had
18 short brown hair. What else can you tell us about his
19 appearance?

20 MR. ALMON: Form.

21 A. He was tall.

22 BY MR. BRUNVAND:

23 Q. Okay. And when you say "tall," what are we
24 talking about, if you can tell?

25 A. Like at least 5'7", 6'.

1 Q. Okay. Somewhere between 5'7" and 6' tall?

2 A. Yeah.

3 Q. Okay.

4 A. Yes, I mean.

5 Q. Anything else you can tell us about his
6 appearance?

7 A. Casually dressed.

8 Q. Okay. Long pants? Short pants?

9 A. I believe jeans.

10 Q. Okay. Long-sleeved shirt? Short-sleeved
11 shirt?

12 A. Yes, long sleeve, if I recall.

13 Q. Was he wearing a mask?

14 A. Yes.

15 Q. Was he wearing glasses?

16 A. No.

17 Q. Was he wearing a hat?

18 A. When I saw him in the closet, I don't remember.

19 Q. Okay. So tell us about that encounter. What
20 happened when you saw this individual?

21 A. I freak out and close the door back.

22 Q. So there was no communication?

23 A. I opened the door back up, and he said somebody
24 reported a power outage.

25 Q. Okay.

1 A. And I closed the door back again.

2 Q. All right. And then what happened?

3 A. I waited for him to leave as I had to reset the
4 timers on the soffit lights.

5 Q. What does that mean? Reset the times on what?

6 A. On the building soffit lights --

7 Q. Okay.

8 A. -- because we had just had the time change.

9 Q. Okay. So you -- so was that an obligation that
10 you had on behalf of the landlord or on behalf of your
11 employer, the veterinary clinic?

12 A. It was -- it's always been my responsibility
13 with the two buildings, even when the other guy -- yeah,
14 because sometimes he'd be out of town and time change
15 would be there.

16 Q. Okay.

17 A. And so I did that for the safety of the
18 property, because they split the -- they split the light
19 bill for the lights. So it was always -- if the owner
20 at the time was here, he'd do it, if not, we'd make sure
21 it was taken care of so the property wasn't dark.

22 Q. And the owner again; who was the owner?

23 A. Glen something. I don't know his name.

24 MR. BRUNVAND: Okay. I'm going to take a brief
25 break just to let the court reporters switch.

1 (Pause in the proceedings.)

2 BY MR. BRUNVAND:

3 Q. So you waited for the person in the closet to
4 leave.

5 How long did the person remain in the closet?

6 A. I don't know. It seemed forever.

7 Q. Okay. Did you have any additional
8 conversations with the person?

9 A. No.

10 Q. Okay. Did you recognize the voice?

11 A. No.

12 Q. Had you seen the person prior to that?

13 A. That's what shook me. I thought I had a week
14 or two prior.

15 Q. Prior to that. I'm not talking about the 21st.
16 I'm talking about a week or two prior to the date that
17 you contacted law enforcement.

18 A. Yeah, prior to finding him in the closet.

19 Q. Okay. And what were the circumstances where
20 you thought you had seen the person a week or two prior?

21 A. He was in the lobby looking in the attorney's
22 windows.

23 Q. Okay. At what time?

24 A. Seems to me it was -- I don't remember now. I
25 don't remember the exact time.

1 Q. When I say "what time," I'm not asking for an
2 exact time. Was it in the morning; in the afternoon?

3 A. Oh. It was in the morning sometime.

4 Q. Was it during normal business hours?

5 A. Yeah. Yes, sir.

6 Q. Did you ask the individual if you could help
7 the person?

8 A. Pardon me?

9 Q. Did you ask him if you could be of assistance
10 when you saw him looking in the windows?

11 A. I told him I wasn't sure if they were open, and
12 if they were I believe they went by appointments.

13 Q. Okay. And when you say he's looking in the
14 windows, is he in the main lobby there?

15 A. Yes, sir.

16 Q. Okay. If I recall correctly, there's a glass
17 door to go into the office; right?

18 A. Yes.

19 Q. Okay.

20 A. Well, the door is wood but there's a glass
21 window next to it.

22 Q. Correct. Correct.

23 So did the door appear to be locked at the
24 time?

25 A. I don't know.

1 Q. Okay. All right. So what was the response
2 when you said that, you know, that they see people by
3 appointments?

4 A. He didn't say anything, and I left. I was on
5 my way to the other building.

6 Q. All right. Any other contact with this
7 individual other than that?

8 A. Not that I recall.

9 Q. All right. On the 3/14 date or thereabouts,
10 did you see the individual leave the building?

11 A. No.

12 Q. Did you see --

13 A. Is it -- what day was it I found him in the
14 closet? It was the day I found him in the closet is
15 when I saw him leave, but not the week or two prior. I
16 didn't see him leave.

17 Q. Okay. The day you saw him in the closet, you
18 saw him leave?

19 A. Yes.

20 Q. Okay. And when you saw him leave, how did he
21 leave the building?

22 A. Out the lobby door.

23 Q. The lobby door by the attorney's office?

24 A. Right.

25 Q. Okay. And did you follow him outside?

1 A. Yes.

2 Q. All right. And what did you see when you
3 followed him outside?

4 A. I waited for him to leave because I knew he
5 wasn't an electrician. We had no power outage.

6 Q. Okay.

7 A. I wanted to see what he was driving and get his
8 tag number.

9 Q. Okay. So you followed him out in order to see
10 him get into a vehicle?

11 A. Yes.

12 Q. What was the vehicle that he got into?

13 A. A Toyota Tundra.

14 Q. How do you recall that?

15 A. He wasn't in a work vehicle. So I was
16 wondering what he was driving and who he was.

17 Q. Okay. As I understand that he wasn't in a work
18 vehicle.

19 How do you recall that it's a Toyota Tundra as
20 compared to any other truck?

21 A. Because I know my trucks. I worked in a body
22 shop for 15 years. I know vehicles.

23 Q. Okay. All right. And did you know what year
24 it was?

25 A. Not right off. It was a newer model.

1 Q. Do you recall what color it was?

2 A. Not precisely.

3 Q. Okay. Generally, was it a dark color? Was it
4 a light color?

5 A. I couldn't -- I can't -- I didn't know the
6 exact color.

7 Q. Okay.

8 A. I can only guess.

9 Q. Anything else unusual about the truck?

10 A. The tags.

11 Q. Tell us about the tag.

12 A. I could not get the tag number, but it was
13 New Jersey tags.

14 Q. New Jersey tags?

15 A. They were yellow, so I'm certain it was the
16 New Jersey tag.

17 Q. Is that because you believe that the only
18 yellow tags are New Jersey tags?

19 A. Oh, no.

20 Q. Okay. I'm sorry?

21 A. No.

22 Q. Okay.

23 A. They had a specific look to them.

24 Q. Okay. What is the specific look that a
25 New Jersey tag has?

1 A. Well, I know what a New Jersey tag looks like.
2 I don't know how to explain that.

3 Q. How do you distinguish it from any other yellow
4 tag from other states?

5 A. Color.

6 Q. The color?

7 A. Colors.

8 Q. Different shade of yellow?

9 A. Mm-hmm. Yeah.

10 Q. Okay.

11 A. And the lettering, you can clearly see
12 New Jersey.

13 Q. Okay. So you could see that it said
14 New Jersey?

15 A. Yes.

16 Q. Okay. All right. Did you have a concern that
17 this individual had put a bomb in the building?

18 A. It's a thought that had occurred to me, or
19 something else.

20 Q. Okay. Is that something that you had expressed
21 to law enforcement at the time?

22 A. I may have.

23 Q. Okay. And, specifically, have you expressed
24 concern that maybe this bomb had been placed into the
25 air conditioning vents in the building?

1 A. It was a thought.

2 Q. Okay. Did you have Todd Tensley check the AC
3 unit on the roof because of that concern?

4 A. Mm-hmm. Yes.

5 Q. Yes?

6 A. Yes.

7 Q. Okay. Are you familiar with how someone might
8 be able to access the AC on the rooftop through the
9 breaker room?

10 A. Yes, there's a ladder built on the wall --

11 Q. Okay.

12 A. -- to get roof access.

13 Q. Do you know whether or not that roof access is
14 locked?

15 A. I don't know. I couldn't tell you.

16 Q. Have you ever accessed it?

17 A. Oh, no.

18 Q. Do you recall telling law enforcement, again,
19 on reference to the March 14th date, that room smelled
20 funky?

21 A. Oh, yes. When I came over from the other
22 building it smelled like bleach; like full strength
23 bleach.

24 Q. Okay. But I'm talking about the previous date.

25 A. Oh. The week before?

1 Q. Right.

2 A. Oh, no. There was nothing that day.

3 Q. Okay.

4 A. Just a strange man in the lobby as I was
5 passing through.

6 Q. Okay. So you did not observe anything unusual
7 about the odors in the room on the earlier date; is that
8 correct?

9 A. Correct.

10 Q. But on March 21st, which is the date that law
11 enforcement came to the office on the second occasion
12 when Mr. Kosowski went missing on that day, did you
13 smell bleach?

14 A. Oh, no, not that day. The date the attorney
15 was missing, yes.

16 Q. Okay.

17 A. Yes.

18 Q. All right. Do you recall telling law
19 enforcement -- we're still on the same day, that the
20 March 21st date, which is the day that the lawyer want
21 missing -- that you believe that the out of order box
22 that was in front of the Building B bathroom was the
23 same box that you had seen in the breaker room
24 previously?

25 A. I don't remember. I don't know.

1 Q. Okay. Do you recall the out of order box that
2 was outside the back?

3 A. Yes. Yeah, there was a box.

4 Q. Okay. Do you recall anything about a box that
5 was seen in the room during the earlier incident a week
6 earlier?

7 A. Yes.

8 Q. Tell us about that.

9 A. I don't know. It was a box that had never been
10 in there before.

11 Q. Okay. Did you do anything to examine the box?

12 A. Not me.

13 Q. Did someone else examine the box in your
14 presence?

15 A. Yes.

16 Q. Okay. Who was that?

17 A. Todd.

18 Q. Okay. And what do you recall about the box
19 being examined in your presence?

20 A. He opened it. He opened the box to see what
21 was in it.

22 Q. Okay. And what was in it?

23 A. Some kind of a wagon.

24 Q. Okay. And the box itself, anything unusual
25 about the box?

1 A. There is no postmark. It was just a plain
2 brown box.

3 Q. Okay.

4 A. No address or from or any shipping, yeah.

5 Q. Okay. And now, do you recall whether or not
6 there was a similar box outside the bathroom on the
7 21st?

8 A. No.

9 Q. Okay.

10 A. I mean, it could have been that box.

11 Q. Okay.

12 A. Oh. I don't know.

13 Q. You don't know. Okay.

14 A. I don't know where that box came from.

15 Q. During the time that you -- specifically in
16 2023, but also other times that you were working at that
17 location, would people sometimes transport pets from
18 Building A to Building B?

19 A. Not to my knowledge.

20 Q. Okay. What is in Building A?

21 A. That is the hospital.

22 Q. Okay.

23 A. That is the veterinarian hospital.

24 Q. All right. And Building B, what's in Building
25 B that's associated with the veterinary hospital?

1 A. The administrative office is leased.

2 Q. Okay. Are any pets being cared for in Building
3 B?

4 A. No.

5 Q. Would pets ever be brought into Building B?

6 A. No.

7 Q. Okay. What do you know about the homeless
8 people being in the area of Building B or Building A?

9 A. They've never been inside the building to my
10 knowledge.

11 Q. Okay. Was there a problem with homeless people
12 outside the two buildings from time to time?

13 A. Oh, it's been rampant for years. My son grew
14 up here for years. For years.

15 Q. It's been what for years?

16 A. There's always been homeless in the vicinity of
17 Largo.

18 Q. Okay. What about specifically as it relates to
19 this address?

20 A. Occasionally you'll find somebody want to sleep
21 on a bench or in the bushes.

22 Q. Was there ever any concerns raised by anyone
23 that worked in the building that you know of about the
24 homeless people?

25 A. I don't know.

1 Q. You don't recall, or...

2 A. I don't know, 'cause I don't know what goes on.
3 I'm not here all the time. Some things happen; I'm not
4 here. I don't know.

5 Q. Okay. Do you recall telling law enforcement
6 that the homeless problem -- people problem had been
7 rampant for years in that area?

8 A. No.

9 Q. Did you say that or --

10 A. I don't know.

11 Q. -- you may have said it?

12 A. I don't know if I said it or not.

13 Q. Would that be an accurate statement?

14 A. That they've been in the vicinity?

15 Q. Yeah, that the problem with the homeless people
16 had been rampant for years in that particular area.

17 A. It's all around everywhere in Largo.

18 Q. That's not my question.

19 My question is if you told law enforcement that
20 it had been rampant for years, specifically as it
21 relates to that building and those two buildings,
22 Building A and Building B.

23 A. Not on the property, per se, but they could be
24 around the surrounding property.

25 Q. Okay. Would it be an accurate statement that

1 there was a homeless problem that was rampant for years
2 as it relates to those buildings? Yes or no?

3 A. It didn't -- I don't know. No.

4 Q. Okay. When you spoke with law enforcement on
5 the 14th of March, 2023, did you indicate to them that
6 you thought you had seen the individual a few weeks
7 prior?

8 A. I may have.

9 Q. Okay. You're not sure?

10 A. I'm pretty sure, because that's why it struck
11 me as so strange.

12 Q. All right.

13 A. I said, that's the guy I saw before. Yeah, so
14 I probably did.

15 Q. Is there a time when you, yourself, concluded
16 that the person that you had seen on the 14th of March
17 was Tom Kosowski?

18 A. He was the same guy I saw in a closet that day.

19 Q. Okay. My question is: Was there a time --
20 obviously on the 14th of March you didn't tell law
21 enforcement that was Tom Kosowski; right?

22 A. Not until the incident happened was law
23 enforcement ever spoken with.

24 Q. Okay. So when the -- so you don't speak to law
25 enforcement prior to the 21st?

1 A. No.

2 Q. Didn't report suspicious male that was in the
3 utility closet?

4 A. That day, yes.

5 Q. Okay. Okay. So you did report that to law
6 enforcement on the 14th?

7 A. Okay. Yes. If that's the date, yes. I don't
8 remember what exact date it was two years ago.

9 Q. One year ago.

10 A. Okay. One year ago.

11 Q. But at that time, you did not recognize the
12 individual as being anyone that you knew; right?

13 A. No, I don't know that person.

14 Q. Okay. And then at some point you indicated
15 that you believe that the person you had seen in the
16 utility closet was in fact Tom Kosowski; correct?

17 A. Yes.

18 Q. Okay. When is it that you decided that you
19 believed that that individual that you had seen was Tom
20 Kosowski?

21 A. Because one of the girls showed me a picture of
22 him and asked me was that him that I saw.

23 Q. Okay. And the girl that showed you the
24 picture, who was that?

25 A. Laura.

1 Q. Was it Laura or was it Deb?

2 A. Deb? No. No. I'm pretty sure it was Laura,
3 because she was worried about me.

4 Q. And the photo that Laura showed you, was it on
5 her cell phone?

6 A. Yeah.

7 Q. Okay. Was it from a news report?

8 A. I don't know. She said there was an article,
9 whatever they call this stuff these days, and obviously
10 that it was. And she asked me was this the guy that I
11 saw in the closet, and I said yes.

12 Q. Was it a booking photo, or was it -- what kind
13 of a photo was it?

14 A. I don't remember.

15 Q. Do you know what a booking photo is?

16 A. Yes.

17 Q. Okay. Do you recall if the person that you saw
18 in the photo was wearing jail clothing or if the person
19 was wearing normal clothing?

20 A. I believe it was orange.

21 Q. Okay. Does that appear to you to maybe be jail
22 clothing?

23 A. I guess. I don't know what they wear.

24 Q. Okay. So it wasn't that Deb, but -- what was
25 her name again?

1 A. Laura.

2 Q. Okay. And where did Laura show you this photo?
3 Where were you when she showed it to you?

4 A. In Building A.

5 Q. Okay. And when was that compared to the day
6 that Mr. Cozzi, the lawyer, went missing.

7 A. A few weeks later perhaps. I'm not sure how
8 long it was.

9 Q. Few weeks later?

10 A. (Nodding head.)

11 Q. Yes?

12 A. Yes.

13 Q. Okay. The reason I asked you to verbalize is
14 the court reporter can't take nodding of the head.

15 A. Yeah, I know. I keep forgetting. Sorry about
16 that.

17 Q. No worries.

18 Had Tom Kosowski been arrested prior to you
19 seeing this photo on the cell phone?

20 A. Well, I would assume so.

21 Q. Well, I mean, did -- had you heard that the
22 person that was suspected of having murdered someone in
23 your building had been arrested?

24 A. Oh, no. I didn't hear anything.

25 Q. So nobody had told you prior to you seeing this

1 photograph that someone had been arrested for
2 murdering -- allegedly murdering someone in your
3 building?

4 A. No.

5 Q. Had you been told that someone had been
6 murdered?

7 A. Somebody was murdered? Well, no.

8 Q. So when you're shown this photo, what do you
9 think the purpose is of being shown this photo if you
10 don't know anything about anyone being accused of
11 anything?

12 A. She was concerned about me because she was
13 scared for me that, for whatever her thinking was, that
14 that was the guy that I saw.

15 Q. Okay. So when Laura shows you this photograph
16 and you say yes, that's the one I saw, what happens
17 next?

18 A. Nothing.

19 Q. And at that point, you hadn't watched any news,
20 hasn't seen any news about what had happened or not
21 happened?

22 A. No. I don't really care for watching the news.

23 Q. And no one had talked about the fact that
24 someone had gone missing and someone had been arrested
25 related to the person going missing?

1 A. No. Everybody is here doing their job.

2 Q. I'm sorry?

3 A. Everybody is here doing their job. Nobody
4 talks about these things --

5 Q. Okay.

6 A. -- that I know of.

7 Q. So who is Deb? Do you know Deb? Is there a
8 Deb that works in the building?

9 A. No. I'm the only Deb.

10 Q. Okay. Is there a Laura that works in the
11 building?

12 A. Yes.

13 Q. What's Laura's last name?

14 A. I don't even know. I don't know the girls'
15 names, first names.

16 Q. Okay. Do you know if Laura still works in the
17 building?

18 A. Yes.

19 Q. Okay. So at that time -- that particular time
20 when Laura showed you the photo, did you contact law
21 enforcement?

22 A. No.

23 Q. Contact the prosecutor?

24 A. Nope.

25 Q. Did Laura say to you if that's who you

1 identified, you should probably contact law
2 enforcement --

3 A. No.

4 Q. -- or you should probably contact the
5 prosecutor?

6 A. There was no conversation.

7 Q. Okay. Only conversation was, is this the
8 person, and you said yes. That was it.

9 A. Yes. Yes.

10 Q. No other conversation?

11 A. Nope.

12 Q. Is there ever a point in time where you contact
13 law enforcement about the fact that you had seen this
14 photo and believed it was the same individual?

15 A. No.

16 Q. Okay. So how is it that at some point law
17 enforcement obtains this information?

18 A. I don't know. They have detectives.

19 Q. Okay. But you never talked to any of them?

20 A. No.

21 Q. What about Mr. Vonderheide? Did you speak with
22 Mr. Vonderheide, the prosecutor?

23 A. When he came on the property.

24 Q. Okay. When was that?

25 A. I don't know the date.

1 Q. Was it --

2 A. It was around the time that all this was
3 happening.

4 Q. Was it before or after you were shown the
5 photograph?

6 A. I think when they were first investigating.

7 Q. Would that be fair to say that would be before
8 you were shown the photograph by Laura; right?

9 A. Yes.

10 Q. Because you indicated that the photograph was
11 showed to you about two weeks after.

12 A. Yeah, it was week after it happened.

13 Q. Were you ever shown a photo pack? Do you know
14 what a photo pack is?

15 A. Nope.

16 Q. Okay. Were you ever shown a series of photos
17 by law enforcement where you were asked to try to
18 identify the person that you had seen in the photo pack?

19 A. No.

20 Q. I believe in the July hearing you had mentioned
21 something about seeing sideburns on the person. Do you
22 recall that? Do you know what sideburns are?

23 A. Yes, I have them myself.

24 Q. Okay. Do you recall seeing --

25 A. Yeah, because his hair is curly. So whether it

1 was sideburns or not specifically, I don't know, but you
2 could see curly hair.

3 Q. Do you recall describing the person having
4 sideburns?

5 A. No.

6 Q. Do you recall whether or not the person had
7 sideburns?

8 A. Not specifically.

9 Q. Okay. Do you recall whether or not the person
10 who was in the photograph that you were shown by Laura
11 had sideburns in the photograph?

12 A. I don't remember. I just remember that curly,
13 brown hair.

14 Q. The person that you had seen two weeks prior to
15 the day of the utility closet incident, do you recall
16 whether or not -- or do you recall what he was wearing?

17 A. The same.

18 Q. Same clothes? Identical?

19 A. I don't know. Just casual jeans and shirt.

20 Q. Okay.

21 A. The casual shoes.

22 Q. Do you recall whether or not that person had a
23 mask on or not a mask on?

24 A. I don't remember if he had a mask on or a mask
25 then that day.

1 Q. Do you recall whether or not he had facial
2 hair?

3 A. No, just the curly, brown hair. Even if it's
4 brown, I guess, yeah.

5 MR. BRUNVAND: I'm going to ask my co-counsel,
6 Willengy Ramos, if she has any questions.

7 MS. RAMOS WICKS: I don't have any questions.

8 MR. BRUNVAND: Okay. Mr. Vonderheide, do you
9 have any questions.

10 MR. VONDERHEIDE: I do, Ms. Heinrichs.

11 CROSS-EXAMINATION

12 BY MR. VONDERHEIDE:

13 Q. You testified in the bond hearing back last
14 July. You remember that; right?

15 A. I did what?

16 Q. You testified in a bond hearing at the
17 courthouse here last July. Do you remember that?

18 A. Oh, yes.

19 Q. When you came in, you walked in the courtroom
20 and you told me that you -- that Mr. Kosowski was the
21 same person you saw in the closet; isn't that right?

22 A. Yes.

23 Q. All right. And then you later testified on the
24 stand you were able to identify him in court as the same
25 person you saw in the closet?

1 A. Yes.

2 MR. VONDERHEIDE: Okay. I don't have anything
3 further.

4 MR. ALMON: I have no questions.

5 REDIRECT EXAMINATION

6 BY MR. BRUNVAND:

7 Q. Was that the first time that you told anyone
8 that that was the same person, other than telling Laura
9 that that was the same person?

10 A. Yes.

11 Q. So you didn't meet with Mr. Vonderheide prior
12 to the hearing and prepare for the hearing?

13 A. No, not to my knowledge.

14 Q. And you didn't tell him this you'd seen a
15 photograph of Kosowski prior to coming into the hearing?

16 A. No. I don't -- hmm-mm.

17 MR. BRUNVAND: Okay. I don't have any other
18 questions.

19 Nathan, do you have any other questions?

20 MR. VONDERHEIDE: I don't. Thank you, Debra.

21 MR. BRUNVAND: I'm going to stop the recording,
22 and maybe Mr. Almon can answer this. Do you want to
23 read or waive on this depo transcript.

24 MR. ALMON: She'll read. Thanks.

25 MR. BRUNVAND: Read. Okay.

1 (At 11:53 a.m., no further questions were
2 propounded to this witness.)
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ERRATA SHEET

IN RE: STATE OF FLORIDA vs. TOMASZ KOSOWSKI
DEPOSITION OF: DEBRA HEINRICHS
TAKEN: 07/12/2024

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, Heather M. von Dorn, Notary Public, State of
Florida, certify that DEBRA HEINRICHS virtually
appeared before me on the 12th day of July, 2024, and
was duly sworn.

WITNESS my hand this 30th day of December, 2024.





Heather M. von Dorn
Notary Public - State of Florida
My Commission No.: HH 609413
My Commission Expires: November 4, 2028

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 DEBRA HEINRICHS;
9 that a review of the transcript was requested; and that
10 the foregoing transcript is a true and complete record
11 of 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 30th day of December, 2019
20 Lori A. Seiden21 Lori A. Seiden, RPR, FPR-C
22
23
24
25

December 30, 2024

DEBRA HEINRICHS
c/o TYLER M. ALMON, ESQUIRE
Shook, Hardy & Bacon, LLP
100 North Tampa Street, Suite 2900
Tampa, Florida 33602

Dear Ms. Heinrichs:

Your deposition taken in the case of State of
Florida vs. Tomasz Kosowski on July 12, 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 30,
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,

Lori A. Seiden, RPR, FPR-C