

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: OFFICER EMMANUEL JONES

DATE TAKEN: April 17, 2024

TIME: 10:02 a.m. to 10:25 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

1 APPEARANCES:
(Appearing via Zoom videoconference)

2 NATHAN T. VONDERHEIDE, ESQUIRE
3 eservice@flsa6.gov
- and -

4 ALEXANDRA G. SPADARO, ESQUIRE
eservice@flsa6.gov
5 Office of the State Attorney
County Justice Center
6 14250 49th Street North
Clearwater, Florida 33762
7 (727) 464-6221

8 Appearing on Behalf of the Plaintiff

9
10 BJORN E. BRUNVAND, ESQUIRE
bjorn@acquitter.com
11 Brunvand Wise, P.A.
615 Turner Street
12 Clearwater, Florida 33756
(727) 446-7505

13 Appearing on Behalf of the Defendant
14
15
16
17
18
19
20
21
22
23
24
25

C O N T E N T S

TESTIMONY OF OFFICER EMMANUEL JONES	PAGE
DIRECT EXAMINATION BY MR. BRUNVAND	4
CERTIFICATE OF OATH	19
CERTIFICATE OF REPORTER	20
EXHIBITS	NONE

1 The deposition of OFFICER EMMANUEL JONES was taken
2 pursuant to notice by counsel for the Defendant on the
3 17th day of April, 2024, commencing at 10:02 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 OFFICER EMMANUEL JONES,
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 swear.

12 DIRECT EXAMINATION

13 BY MR. BRUNVAND:

14 Q. My name is Bjorn Brunvand. We're here on State
15 of Florida vs. Thomas Kosowski. Mr. Vonderheide is here
16 on behalf of the State.

17 If you could, please state your full name.

18 A. My name is Officer Emmanuel Jones.

19 Q. And how are you employed?

20 A. As an officer with the Largo Police Department.

21 Q. And how long have you been with Largo Police
22 Department?

23 A. Been with Largo Police Department about nine
24 years.

25 Q. Okay. Did you prepare one or several reports

1 detailing your involvement in this case?

2 A. Yes, I -- I did a supplement.

3 Q. Just one?

4 A. Just one.

5 Q. Okay. The supplement that I'm looking at is a
6 one-page report. It's really just a half-a-page report
7 it looks like.

8 A. Correct.

9 Q. Okay. Excuse me one second.

10 Okay. The -- have you had a chance to review
11 that report?

12 A. I have.

13 Q. Does it appear to be complete and accurate?

14 A. It does.

15 Q. Okay. Were you also wearing a body cam video
16 during your -- video recording device during your
17 involvement in this case?

18 A. I was.

19 Q. Okay. Was it activated?

20 A. It was.

21 Q. The -- so tell us, what do you first do in this
22 case?

23 A. My involvement in this case, I responded to a
24 target address as an assisting officer to the primary
25 officer, who was Officer Byrd. Once I got there, I

1 mainly assisted Officer Byrd in attempting to locate the
2 victim, so -- which means that I did an area check of
3 the -- I went out to his vehicle, tried to see if maybe
4 he was in there.

5 Then I, after looking in the vehicle, came
6 inside, searched the inside of the business. And then I
7 also did an area check of surrounding businesses and the
8 nearby soccer complex. And then after that, I took up a
9 static post in front of the bathroom to kind of just
10 basically make sure that no one entered that bathroom.

11 Q. Okay. Do you know when you took up that post?

12 A. What time I took up the static post?

13 Q. Yes.

14 A. I don't know the exact time that I took up that
15 post, no.

16 Q. Okay. What about the time that you first
17 responded?

18 A. The time that I first responded?

19 Q. Yes.

20 A. I'd have to pull up the call for the date and
21 time of the call.

22 Q. Yeah. March 21st, right, 2023?

23 A. Mm-hmm. I don't have that information in front
24 of me, but I can look it up and see exactly what time
25 the call came out and what time we arrived on scene.

1 Q. So based on that information, would you also be
2 able to narrow down the time when you take up the static
3 post in front of the bathroom?

4 A. I took up the -- so I took up that static
5 post -- if I -- give me one second. I can give a
6 roundabout time. It won't be an exact time, but I can
7 give you a general.

8 Okay. So looks like around 2:00 p.m.

9 Q. Around 2:00 p.m. Okay.

10 A. Mm-hmm.

11 Q. And then for how long?

12 A. How long was I at that static post?

13 Q. Yeah.

14 A. It looks like I was there for probably about
15 almost an hour.

16 Q. Okay.

17 A. Until Officer Almeda came to relieve me.

18 Q. Do you recall who was -- the location in
19 question is 1501 Belcher; right?

20 A. Correct.

21 Q. Who was there as far as law enforcement when
22 you arrived?

23 A. Who was there as far as law enforcement?

24 Q. Yes.

25 A. Just myself and Officer Byrd. That was

1 initially, and then after that, obviously, more law
2 enforcement arrived.

3 Q. Okay. And do you know -- can you give me the
4 sequence of who else arrived and when they arrived?

5 A. I don't -- no, I can't.

6 Q. Okay. Did you question any potential
7 witnesses?

8 A. There was some of the employees inside of the
9 business. We got there and they were at -- showed up on
10 scene and basically telling us that they couldn't
11 find -- explaining to both me and Officer Byrd that they
12 couldn't find the victim. So we basically just took
13 that information and then tried to locate him.

14 Now, did I do any -- I didn't do any in-depth
15 interviews of anybody. My conversations were mainly
16 attempting to find the whereabouts, if maybe he had
17 wandered off or whatever, because at that time we
18 wasn't -- we didn't know what had happened, so...

19 Q. When you were talking to these employees, were
20 these employees of the law firm?

21 A. They are employees of that -- so there's -- I
22 believe there's several businesses that are conjoined in
23 there; right? Because you got 1501 Belcher, but then
24 the actual office is 6B, 6 as in bravo. So you have
25 conjoining offices and things of that nature. So I

1 spoke with multiple people from that complex as well as
2 the law firm.

3 Q. And would your body cam video be recording when
4 you were talking to these potential witnesses?

5 A. Yes.

6 Q. Okay. So the recording itself would be the
7 best evidence of what may have been said during those
8 encounters?

9 A. Absolutely.

10 Q. Okay. Do you know -- did you have information
11 about what color shirt Steven Cozzi was wearing under
12 his red sweater?

13 A. I do not recall.

14 Q. Okay. Were you involved in making a
15 determination that the person seen leaving on the video
16 surveillance around 10:22 a.m. was not Steven Cozzi?

17 A. I believe that me and Officer Byrd did have a
18 brief conversation about that. And as far as what the
19 details of that conversation was, I can't -- I can't
20 recall, but I do know that we did have conversations
21 about -- because I know we looked at the video and saw
22 someone leaving, but I think, ultimately, we determined
23 that it wasn't him.

24 Q. Do you recall how that determination was made?

25 A. I do not recall.

1 Q. Okay. Would the -- do you know whether or not
2 the body cam was recording audio at the time when this
3 conversation took place?

4 A. I believe so, but I'm not 100%.

5 Q. Okay. All right. Do you recall speaking with
6 anyone about the homeless population around 1501
7 Belcher?

8 A. I don't recall specifically, no.

9 Q. Okay. Have you received the body cam video?

10 A. Yes, I did.

11 Q. Okay. Recently or a long time ago?

12 A. Recently. I didn't -- I reviewed it for my
13 involvement. I didn't review every minute of it because
14 it's quite lengthy.

15 Q. Right.

16 A. But I didn't review every minute of it, but I
17 did review my involvement in it.

18 Q. Okay. Do you recall anyone telling you that
19 there was a very large homeless population?

20 A. I don't recall.

21 Q. Okay. And further that the homeless population
22 was -- that they were hanging out in the back of the
23 building.

24 Do you recall anything like that?

25 A. Probably, but I don't want to speak out of

1 turn. I can't say that I recall that for sure.

2 Q. Okay. So if that's on the body cam recording,
3 that might help refresh your memory as it relates to
4 that?

5 A. Yes.

6 Q. Okay. Did you notice a gray Toyota Tacoma in
7 the parking lot of 1501 Belcher when you were doing the
8 walk-through?

9 A. I did not.

10 Q. Okay. Do you recall anything about any
11 vehicles in the parking lot other than Steve Cozzi's
12 vehicle?

13 A. No.

14 Q. Okay.

15 A. We remember going up to Steve Cozzi's vehicle
16 and just looking at his vehicle and noting the tag and
17 all that.

18 Q. Yeah.

19 Was there -- had you been made aware at any
20 point that there was concerns about any particular
21 vehicles or types of vehicles?

22 A. No.

23 Q. Okay. Were you stationed statically in front
24 of the bathroom more than one time or just the one --
25 the one time?

1 A. Mainly just the one time once Detective Hunt
2 arrived as what he asked me what to do.

3 Q. And did you -- did you maintain some sort of a
4 log of people -- law enforcement that may have entered
5 the bathroom while you were there?

6 A. That may have entered the bathroom?

7 Q. Right.

8 A. No, I don't believe I did any -- I know a crime
9 scene log was completed, but it wasn't by me.

10 Q. Okay. Do you recall -- during the time period
11 that you were in front of the bathroom, do you recall
12 other members of law enforcement entering the bathroom?

13 A. I believe -- I can't say for sure. I'm not
14 going to guess. I don't recall.

15 Q. Well, so first question is not necessarily
16 identifying them, but do you recall anyone entering the
17 bathroom while you were there?

18 A. I believe so, yes.

19 Q. Okay. Do you recall who those people were?

20 A. I do not.

21 Q. Okay. And that may be reflected on the body
22 cam video?

23 A. Yes.

24 Q. If you looked at the body cam video, do you
25 think you might be able to name the people that went

1 through into the bathroom?

2 A. Yes.

3 Q. Okay. Do you recall whether or not the people
4 that entered the bathroom were wearing gloves and had
5 shoe covers on?

6 A. I do not recall.

7 Q. Okay. Do you recall observing Michael
8 Montgomery enter the bathroom?

9 A. No, I don't recall.

10 Q. Okay. Do you recall any non-law enforcement
11 officers entering the bathroom?

12 A. I do not recall.

13 Q. Were you instructed that no one could enter the
14 bathroom?

15 A. Yeah. Once I took up that static post, like I
16 said, around 2:00, yeah, during that time, I don't
17 believe anybody went into that bathroom, but like I
18 said, I'd have to look at the body cam during that time
19 that I was watching it.

20 Q. Okay. Do you know -- do you know the time that
21 the area was determined to be a crime scene?

22 A. No, I don't.

23 Q. Do you recall seeing any type of paper debris
24 in front of the bathroom door?

25 A. No, I don't recall. I believe initially there

1 was a box in front of that bathroom door. It was like a
2 cardboard box --

3 Q. Okay.

4 A. -- but other than that, I don't recall anything
5 else in front of the door.

6 Q. All right. Did you note if any debris from
7 within the bathroom was tracked from inside to the
8 outside, possibly being stuck to someone's boot?

9 A. No.

10 Q. Did you witness anyone stepping on debris
11 outside of the bathroom?

12 A. No.

13 Q. Did you discuss with anyone the amount of blood
14 found within 1501 in the bathroom with anyone?

15 A. Yes.

16 Q. Who did you discuss that with?

17 A. I discussed that with Sergeant Recla whenever
18 he arrived, just kind of showed him where the blood was
19 and what we had already seen. And I also remember
20 discussing that with the primary officer, Officer Byrd.

21 Q. Okay. Do you recall what you concluded about
22 the amount of blood found in the bathroom?

23 A. What I concluded about it? It wasn't my place
24 to make a conclusion at to what occurred.

25 Q. Okay. So if there's a conversation between you

1 and other members of law enforcement where you make your
2 conclusions about what you saw, do you have any
3 recollection of that?

4 A. Yeah. I mean, so, initially we thought that --
5 whenever I was talking with Officer Byrd before
6 detectives and stuff arrived, we thought that maybe it
7 was a possible medical episode --

8 Q. Okay.

9 A. -- but we weren't sure.

10 Q. Okay. Did you -- do you recall opining that it
11 wasn't a lot of blood or didn't appear to be a lot of
12 blood?

13 A. Mm-hmm.

14 Q. Yes?

15 A. Yes.

16 Q. Okay. Did you -- did you at some point observe
17 Detective Bolton enter the bathroom?

18 A. Yes, he did enter the bathroom.

19 Q. Okay. Did he have shoe covers on when he did?

20 A. I do not recall.

21 Q. Okay. How about Detective Hunt? Do you recall
22 him entering the bathroom?

23 A. I am unsure. I don't recall.

24 Q. Okay. Do you know whether or not Detective
25 Bolton was wearing gloves when he entered the bathroom?

1 A. I don't recall.

2 Q. Did you observe Detective Bolton touching
3 things within the bathroom without wearing gloves?

4 A. Did I? I don't recall.

5 Q. Okay. What about the same question for
6 Detective Hunt?

7 A. Do not recall.

8 Q. Okay. Do you recall touching the bathroom door
9 yourself without wearing gloves?

10 A. Yes.

11 Q. Okay. Tell me --

12 A. Initially to -- initially when I were to open
13 the door, I did use -- I used my hands, my fingertips to
14 open the door.

15 Q. Did you have gloves?

16 A. Did I have gloves? Yes.

17 Q. Okay. Is that something that you carry with
18 you as a standard operating procedure?

19 A. Gloves? Yes.

20 Q. Okay. What's the purpose of having gloves?

21 A. To protect yourself from, you know, possibly
22 blood, foreign pathogens, things of that nature.

23 Q. Okay. Any other purpose?

24 A. Yeah, and also to preserve crime scenes and
25 things of that nature.

1 Q. Okay. You indicated that you touched the
2 bathroom door when you opened it. What about anything
3 inside the bathroom? Did you touch any items inside the
4 bathroom?

5 A. I don't believe that I did, but I don't recall
6 specifically.

7 Q. Okay. So, again, you know, presumably if the
8 body cam video is active, that would assist in -- as it
9 relates to that question?

10 A. Absolutely.

11 Q. Okay. Did you wear shoe covers when you
12 entered the bathroom?

13 A. I did not.

14 Q. Did you witness Officer Byrd enter the bathroom
15 and touch items without gloves on?

16 A. I don't recall.

17 Q. Did you witness Sergeant Recla enter the
18 bathroom without gloves on?

19 A. Yes.

20 Q. Did Sergeant Recla touch any of the items
21 within the bathroom in your presence?

22 A. I believe he also touched the door.

23 Q. Okay. Anything else?

24 A. I don't recall him touching anything else.

25 Q. Okay. Okay. Is there anything else that you

1 did that's not included in the report and that we
2 haven't talked about here today?

3 A. No.

4 MR. BRUNVAND: All right. I don't have any
5 other questions.

6 Mr. Vonderheide, I don't know if you have any
7 questions.

8 MR. VONDERHEIDE: No further questions.

9 MR. BRUNVAND: No questions. All right. I
10 just realized I did not record Officer Jones. All
11 right. My bad. We have a court reporter, so we'll
12 survive.

13 If this is going to be transcribed, would you
14 like to read or waive reading of the transcript?

15 THE WITNESS: I'll waive.

16 MR. BRUNVAND: Waive? Okay.

17 (At 10:25 a.m., no further questions were
18 propounded to this witness.)
19
20
21
22
23
24
25

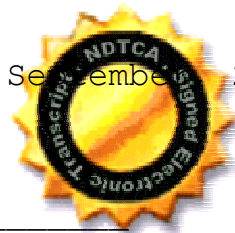
CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF PINELLAS

I, Lori A. Seiden, RPR, FPR-C, Notary Public,
State of Florida, certify that OFFICER EMMANUEL
JONES virtually appeared before me on the 17th day of
April, 2024, and was duly sworn.

WITNESS my hand this 23rd day of September 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

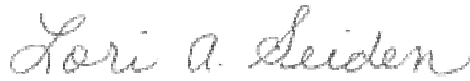
1 CERTIFICATE OF REPORTER

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 OFFICER EMMANUEL
9 JONES; that a review of the transcript was not
10 requested; and that the foregoing transcript is a true
11 and complete record 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 23rd day of September, 2024.

19
20 

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