

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 CRAIG JUSTICE

DATE TAKEN: SEPTEMBER 11, 2023

TIME: 2:57 p.m. - 3:06 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
ALEXANDRA SPADARO, Esquire
Office of State Attorney
Post Office Box 17500
Clearwater, Florida 33762-0500

Counsel for the Defendant:

WILLENGY W. RAMOS WICKS, Esquire
Brunvand & Wise, P.A.
615 Turner Street
Clearwater, Florida 33756

DEBRA B. TUOMEY, Esquire
Debra B. Toumey LLC
5026 Cumberland Lane
Spring Hill, Florida 34607-2307

I N D E X

SEPTEMBER 11, 2023

WITNESS

Called by the Defendant:

CRAIG JUSTICE

DIRECT EXAMINATION BY MS. RAMOS WICKS..... 4

CERTIFICATE OF OATH..... 14

CERTIFICATE OF REPORTER..... 15

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: I swear.

7 CRAIG JUSTICE, called as a witness by the
8 Defendant, having been virtually duly sworn,
9 testified as follows:

10 DIRECT EXAMINATION

11 BY MS. RAMOS WICKS:

12 Q Good afternoon, Deputy Justice. How you
13 doing today?

14 A Pretty good. How are you?

15 Q Good. My name is Willengy Ramos Wicks. I am
16 an associate attorney at Brunvand Wise P.A. Myself
17 along with my partner, Bjorn Brunvand, we represent
18 Dr. Kosowski in this case.

19 Alongside us is also Ms. Tuomey, Debra
20 Tuomey, who's also present on this virtual forum.
21 She's one of the lead attorneys on this case as well.

22 A Okay.

23 Q In addition to the defense side of things,
24 there's also the state attorney side of things. The
25 lead attorney on the case, Nathan Vonderheide, is

1 present and also Assistant State Attorney Alex,
2 Alexandra Spadaro. In addition to all the attorneys,
3 there's also the court reporter, Tammy Kelley.

4 So I just wanted to introduce you to
5 everybody that's involved.

6 A Appreciate it.

7 Q No problem. So, to get started, can you
8 please state your name and spell your last name for the
9 record.

10 A My name is Craig Justice, J-u-s-t-i-c-e.

11 Q All right. And, Deputy Justice, where do you
12 work?

13 A Largo Police Department.

14 Q How long have you worked there?

15 A Since 2014.

16 Q Since 2014. Okay. So during the almost ten
17 years that you've been there, what positions have you
18 held?

19 A Patrol.

20 Q Patrol. Okay. Do you have any prior
21 experience in law enforcement before Largo Police
22 Department?

23 A I had about six months at Bradenton Police
24 Department.

25 Q Okay. Did you work in patrol there as well?

1 A Yeah.

2 Q Okay. Did you write a supplement in
3 connection to this case?

4 A I did.

5 Q All right. Have you had a chance to review
6 that supplement prior to this deposition this
7 afternoon?

8 A I have not. I've had some computer issues.
9 I was trying to pull it up for about the last 20
10 minutes before this and it keeps locking up. I think
11 there's too much data on our old computer system.

12 Q Okay. Do you need an opportunity to review
13 it?

14 A It depends. I had limited involvement.

15 Q Okay.

16 A But if you ask me what you need to ask and if
17 I don't recall or if I need to take a break, I'll let
18 you know.

19 Q Sounds good. All right. So I'm just gonna
20 jump right in then. How did you become involved in
21 this case?

22 A I was asked as part of the special response
23 team that I'm on to -- for manpower to go down and help
24 look for evidence.

25 Q Okay. And where were you looking for

1 evidence?

2 A I don't have the exact address. It was a
3 large landfill.

4 Q Okay. In Collier County?

5 A Yes.

6 Q All right. You said that you were part of a
7 special team. In your report it says SIRT team. Like
8 what is a SIRT team?

9 A It's special incident response team. And
10 it's kind of a combination of search and rescue, riot
11 control, and then anytime we need -- like we've had any
12 previous -- we need manpower on a case, they'll use us.

13 Q Okay. So were you on scene at the landfill
14 during all three days that the search took place?

15 A Yeah.

16 Q Okay. Now, when you initially responded to
17 the landfill, you know, on day one to engage in this
18 search, were there instructions given to you as far as,
19 like, what was going to take place and how?

20 A Yes.

21 Q Okay. And what were those instructions as
22 far as, you know, relating to the search of the
23 landfill?

24 A Most of it was just items that they wanted us
25 to keep an eye out for that were possibly items of

1 interest.

2 Q All right. And what were the specific items
3 of interest?

4 A I'm not sure if I remember all of them. But
5 at the time I believe it was some black trash bags.
6 There was a -- possibly some Chick-fil-A was involved
7 somehow. I don't know how it was. It was just to keep
8 an eye out for and let the detectives know.

9 There were jeans and some shoes and I
10 believe it was a red blanket of some kind. And
11 that's all I can recall.

12 Q Who gave these instructions to you?

13 A It was announced in a group forum for
14 everybody that was involved. I can't remember exactly
15 who it was that gave the instructions.

16 Q Okay. So can you generally describe the
17 process of how the search took place. Like where were
18 you searching, how were you searching, what was going
19 on as far as the scene was concerned at the landfill.

20 A I can give you a little bit. I wasn't in
21 charge of exactly the full details of it. Mostly it
22 was like a stand here, look for this, come over here,
23 look for this.

24 So I'm not sure what kind of grid patterns
25 they were using or anything like that. It was more

1 of a just had us stand by and switching out just
2 based off of fatigue, you know, who was standing
3 where and taking a break. It was mostly just stand
4 here, keep an eye out for any of the items that were
5 listed.

6 Q Okay. And were you searching by hand? Were
7 you using, like, shovels to search? Like, how was that
8 process for you?

9 A We had rakes for some of it. Some of it was
10 the large machinery that was moving the stuff around
11 because of shear quantity that was there. A little bit
12 of a combination of both.

13 Q Okay. Thank you. And were there many law
14 enforcement personnel on scene that day also engaging
15 in searching and monitoring the search?

16 A It was three days. The first day there was
17 considerably more. And I believe the number dropped,
18 but I couldn't give you a number on any of the given
19 days.

20 Q Okay. So the first day there was more and
21 then the second day it was less and then the third day
22 it was even more less than that?

23 A I don't recall if the third day was less than
24 the second day. I just know the first day that there
25 was more.

1 Q Okay. When did you start searching on each
2 day?

3 A It varied. We would get there first thing in
4 the morning, although I don't know the initial -- the
5 exact times on that. And then it would go until
6 whenever they called it. I believe they were pretty
7 long days though. I think they were like 12- to
8 15-hour days.

9 Q Okay. And so you would start sometime in the
10 morning and then stop sometime late into the evening?

11 A Correct.

12 Q All right. During your specific search, did
13 you find anything of evidentiary value?

14 A Nothing that pertained to the case. We had a
15 lot of times where it was like stop and we'd go to look
16 for something. But it turned out I never discovered
17 anything that was actually evidentiary.

18 Q Were there K-9 cadaver dogs that were
19 utilized for all three days during the search of the
20 landfill?

21 A I believe so. There definitely was a K-9 dog
22 there and I believe that they were there all three
23 days.

24 Q During the three days that you searched the
25 landfill, you indicated you were being directed to

1 different places. Was it -- were all the places that
2 you searched within the boundaries of the landfill?

3 A Oh, yes, yes. And they had, they had it
4 marked out a certain area that was the place of
5 interest. But I don't know, like, the -- any details
6 of that. It was just the area we were that was the
7 same area every day of the landfill.

8 Q Were you wearing a body-worn camera during
9 your efforts to assist in the search?

10 A No. We were, we were wearing BDUs and like
11 hard hats and gear specific to being in the landfill
12 all day.

13 Q And what is a BDU?

14 A Like the just pants with pockets. They are
15 like when we're not on patrol. It's our utility pants.

16 Q All right.

17 A Sorry.

18 Q No problem. You're good.

19 MS. RAMOS WICKS: I don't have any further
20 questions. I'm gonna pass it along to my
21 colleague, Ms. Tuomey, and see if she has any
22 questions.

23 THE WITNESS: Okay.

24 MS. TUOMEY: Good afternoon. I don't have
25 any further questions of you. Thank you.

1 THE WITNESS: Okay, thank you.

2 MR. VONDERHEIDE: No questions.

3 MS. SPADARO: No questions.

4 MS. RAMOS WICKS: All right. And, Deputy,
5 would you like to read or waive?

6 THE WITNESS: Can you explain.

7 MS. RAMOS WICKS: Okay. So you have two
8 options, right. You can decide -- the first
9 option is to read.

10 So if you decide to read, then a copy of
11 your deposition will be provided. You'll be
12 able to read it to see if there's any errors in
13 the taking of the deposition. And if there are
14 errors, those errors will be placed on an
15 errata sheet.

16 It's not gonna change the actual content
17 of the deposition. But you will have a chance
18 to review it.

19 THE WITNESS: Okay.

20 MS. RAMOS WICKS: Not saying you won't ever
21 have a chance to review it prior to trial. But
22 if you read, you will have a chance to review it
23 and the court reporter will give you an
24 opportunity to review it.

25 THE WITNESS: Okay. Does the state attorney

1 have a preference for that?

2 MS. RAMOS WICKS: It's your call. But I'll
3 let Mr. Vonderheide speak on that or Ms. Spadaro
4 speak on that.

5 THE WITNESS: Okay.

6 MR. VONDERHEIDE: I don't have a preference
7 on this depo.

8 MS. RAMOS WICKS: Okay. So he said he
9 doesn't have a preference on this depo. So you
10 can either read or waive.

11 THE WITNESS: I believe I'm comfortable
12 waiving today. Thank you.

13 MS. RAMOS WICKS: All right, thank you.

14 (The deposition was concluded at 3:06
15 p.m.)
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF POLK)

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

WITNESS my hand and official seal this 26th
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 CRAIG JUSTICE, that a view of the transcript was not
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 26th day of December 2024.

18 
19

20 TAMMY KELLEY
21
22
23
24
25