

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 KRISTI KLOTZ

DATE TAKEN: APRIL 10, 2024

TIME: 2:03 p.m. - 2:12 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:

BJORN BRUNVAND, Esquire  
Brunvand & Wise, P.A.  
615 Turner Street  
Clearwater, Florida 33756

I N D E X

APRIL 10, 2024

WITNESS

Called by the Defendant:

KRISTI KLOTZ

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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, I do.

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

10                         DIRECT EXAMINATION

11         BY MR. BRUNVAND:

12           Q     My name is Bjorn Brunvand. We're here on  
13           State of Florida versus Tomasz Kosowski. Present is  
14           myself and State Attorney Spadaro and Vonderheide.

15                         If you could please state your name.

16           A     My name is Kristi Klotz.

17           Q     And how are you employed?

18           A     I am a forensics science specialist at the  
19           Pinellas County Sheriff's Office.

20           Q     And how long have you been so employed?

21           A     I have been with the sheriff's office for  
22           seventeen years. Seven -- let me think. Ten of  
23           those years as a forensic science specialist.

24           Q     Okay, all right. And what about prior to  
25           that, what were you doing?

1           A     The other seven years I was in the  
2 property and evidence section.

3           Q     Okay, all right. Did you prepare a report  
4 detailing your involvement in this case?

5           A     Yes. I had supplement 17.

6           Q     Supplement 17. I have that in front of  
7 me. It appears to be a two-page supplement --

8           A     Correct.

9           Q     -- with that very short narrative.

10          A     Yes, very simple.

11          Q     Okay. So it appears that this takes place  
12 on March 24th starting around 8:47 a.m.?

13          A     Correct.

14          Q     And the location, 4801 145th Avenue North  
15 in Clearwater, what's that?

16          A     That would be the forensic sciences  
17 division.

18          Q     Okay.

19          A     That would be our home office.

20          Q     So it says you at the request of  
21 Supervisor Stropes and Assistant Supervisor Klein  
22 you photographed and collected eliminations from  
23 Officer Jennifer Bure from the Largo Police  
24 Department.

25          A     Correct.

1 Q What does that mean?

2 A One of the officers, I was told she had  
3 responded to the initial crime scene, was Officer  
4 Jennifer Bure. I guess that's how you pronounce her  
5 name. And she was told to come to our office so  
6 that she could provide fingerprints, a buccal swab,  
7 and photograph her uniform boots and she was told to  
8 do that by a detective from my understanding.

9 Q Okay. So the officer basically met you  
10 there at your location?

11 A Yes. Yep.

12 Q Okay.

13 A She showed up and we did it.

14 Q All right. And so you documented it says  
15 the bottom of her boots with photographs.

16 A Yep, yep.

17 Q If I'm going to look for those  
18 photographs, it appears that most of the photographs  
19 has, like, a letter and maybe some numbers in front  
20 of them.

21 A Um-hum.

22 Q Can you help me with my --

23 A Let me see my notes real quick. Yeah, if  
24 you can give me a second, I can try to find --

25 Q 100 percent.

1           A     -- find out which ones are mine.  Bear  
2     with me.

3           Q     Take your time.

4           A     All right, let's see.  Okay.  My photos,  
5     it looks like, are going to be -- you know, how  
6     each, each set of photos is assigned a letter?

7           Q     Yes.

8           A     I'm going to be R.

9           Q     R.  Okay.

10          A     And the first photo's actually going to be  
11     a picture of the officer, like an overall picture of  
12     her.

13          Q     Okay.  And how many total photos?

14          A     I believe it was eleven.  Let me  
15     double-check on that.  I lied.  That would be six  
16     photos.

17          Q     Six photos.  Okay.

18          A     Six photos.

19          Q     Very good.  Thank you so much.

20          A     Sure.

21          Q     Then it appears that you also collected  
22     DNA and elimination prints from the officer.

23          A     Correct.  Basically took her fingerprints,  
24     palm prints, and then collected a buccal swab, DNA  
25     swab from her cheek.

1 Q Okay.

2 A And that was it.

3 Q And what is, what is the reason again for  
4 collecting all these things from the officer?

5 A That was just the detective sent her down  
6 to do it, so we did it. We were told she's coming  
7 to do it, so that's what we did. And we were told  
8 she responded initially to the scene. So I don't  
9 know if that was why.

10 Q Would that make, would that make sense if  
11 someone responded initially to the scene?

12 A We have done that before, yes.

13 Q Okay. And would that be in the event that  
14 an unknown DNA surfaces at the crime scene they can  
15 compare it and see whether or not it belongs to the  
16 officer of it or it belongs to someone else?

17 A That's correct, yes.

18 Q Okay.

19 A Absolutely.

20 Q Do we know whether or not the boots that  
21 the officer was wearing on the 24th were in fact the  
22 same issued boots that she was wearing on  
23 March 21st?

24 A When I asked her, she said, yes, they  
25 were.



1 Q Okay. Do you know whether or not Officer  
2 Bure wore shoe covers while at the scene?

3 A I have no idea.

4 Q Okay. Do you know -- did you have any  
5 other involvement in this case?

6 A No. This was my only involvement.

7 Q Only involvement. Okay.

8 A Yep.

9 MR. BRUNVAND: Very good. I don't have  
10 any other questions.

11 MR. VONDERHEIDE: No questions.

12 MR. BRUNVAND: Very good.

13 MS. SPADARO: No questions.

14 MR. BRUNVAND: Do you want to read or  
15 waive if we transcribe your deposition?

16 THE WITNESS: I'll read.

17 (The deposition was concluded at 4:13  
18 p.m.)  
19  
20  
21  
22  
23  
24  
25

ERRATA SHEET

DO NOT WRITE ON TRANSCRIPT -- ENTER CHANGES HERE

IN RE: STATE OF FLORIDA VERSUS TOMASZ KOSOWSKI  
DATE TAKEN: APRIL 10, 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.

\_\_\_\_\_  
KRISTI KLOTZ

CERTIFICATE OF OATH

STATE OF FLORIDA     )  
COUNTY OF POLK       )

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

WITNESS my hand and official seal this 8th  
day of January 2025.

TAMMY KELLEY  
NOTARY PUBLIC - STATE OF FLORIDA  
MY COMMISSION NO. HH 216644  
EXPIRES: 02/07/26



## REPORTER'S DEPOSITION CERTIFICATE

STATE OF FLORIDA )

COUNTY OF POLK )

I, TAMMY KELLEY, certify that I was authorized to and did stenographically report the virtual deposition of KRISTI KLOTZ, that a view of the transcript was requested and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties, nor am I a relative of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 8th day of January 2025.



TAMMY KELLEY

January 8, 2025

Ms. Kristi Klotz  
kklotz@pcsonet.com

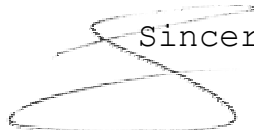
Dear Ms. Klotz:

Your deposition taken in State of Florida versus Tomasz Kosowski on April 10, 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 dark ink, appearing to be 'Tammy Kelley', written over the word 'Sincerely,'.

Tammy Kelley