

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: JOCELYN LUCIDI

DATE TAKEN: July 10, 2024

TIME: 2:33 p.m. to 2:47 p.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.
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(Appearing via Zoom videoconference)

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C O N T E N T S

TESTIMONY OF JOCELYN LUCIDI	PAGE
DIRECT EXAMINATION BY MR. BRUNVAND	4
ERRATA SHEET	17
CERTIFICATE OF OATH	18
CERTIFICATE OF REPORTER	19
WITNESS NOTIFICATION LETTER	20
EXHIBITS	NONE

1 The deposition of JOCELYN LUCIDI was taken pursuant
2 to notice by counsel for the Defendant on the 10th day
3 of July, 2024, commencing at 2:33 p.m., via Zoom
4 videoconference. Said deposition was stenographically
5 reported by Lori A. Seiden, RPR, FPR-C, Notary Public,
6 State of Florida at Large.

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8 JOCELYN LUCIDI,
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. My name is Bjorn Brunvand. I represent Tom
15 Kosowski. We're here on State of Florida vs. Tom
16 Kosowski. Also present for this deposition, in addition
17 to the court reporter, is State Attorney Nathan
18 Vonderheide and Alexandra Spadaro.

19 If you could, please state your full name.

20 A. Jocelyn C. Lucidi.

21 Q. And you have been listed as a witness in this
22 case, and it relates to March of last year when law
23 enforcement came to your home.

24 Do you recall that?

25 A. Definitely.

1 Q. Okay. Do you recall the date they first came
2 to your home?

3 A. That day, March 23, Thursday.

4 Q. March 23. Okay.

5 And do you recall the time that they arrived?

6 A. There's no way I can pinpoint that.

7 Sometime -- I believe sometime in the morning.

8 Q. In the morning. Okay.

9 A. Not early, though. Not early in the morning,
10 but just, I think sometime in the morning, yes.

11 Q. So mid to late morning?

12 A. Between -- between -- I'd say between 9:00 and
13 11:00 maybe.

14 Q. Okay. All right. And how many law enforcement
15 officers showed up at your home?

16 A. They knocked at my door. And I can tell you
17 exactly. Two officers from Largo Police Department
18 knocked on my door.

19 Q. Do you recall their names?

20 A. I certainly do. They are Detective Compton and
21 Amanda Gay.

22 Q. Okay. And --

23 A. I have the card. I have the card in front of
24 me, that's why.

25 Q. Okay. That's helpful.

1 And what did they want when they showed up at
2 your house?

3 A. Well, I first asked what can we do for you,
4 officers. And they said, "Well, we were wondering.
5 We're walking around and we saw that you have a Ring
6 camera, and we were wondering if it's okay if we could
7 take a look at it."

8 Q. Okay.

9 A. I asked, what's going on, so -- right? So...

10 Q. What did they say when you said what's going
11 on?

12 A. Actually, they hesitated, 'cause they almost
13 didn't know what to tell me. They said -- I always say,
14 oh, my goodness, what's going on? Is there an intruder?
15 You know, something is going on. What are you guys
16 looking for? Somebody steal something?

17 I mean, they said, well -- they weren't sure
18 what to tell me. I think they were saying, like, we're
19 looking for a vehicle. I remember them telling me we're
20 looking for a vehicle. It's maybe a truck and it's a
21 dark-colored truck.

22 Q. Okay.

23 A. I remember them saying, yeah, we're kind of
24 looking for a vehicle.

25 Q. All right.

1 A. That's what they were looking for. That's it.

2 Q. And did that tell you anything. I mean, or --

3 A. No. We have cars coming by here, and our
4 neighbor across the street, they have trucks.

5 Q. Okay. All right. So -- and do I understand
6 your house is south of Dr. Kosowski's house?

7 A. It is.

8 Q. Okay. So do they mention anything about
9 Dr. Kosowski?

10 A. Not at all. Not at all.

11 Q. Okay.

12 A. I had no clue what it was about at this point.
13 No clue.

14 Q. All right. So they want to see the Ring
15 camera?

16 A. Yes.

17 Q. And do you show them the Ring camera?

18 A. Well, they asked me if they could see it. And
19 I said, "Well, if it helps you guys out about a possible
20 crime or whatever, sure, you guys can see it." So I let
21 them in the house.

22 Q. All right. All right. And did you feel
23 pressured into showing them the Ring camera or were you
24 happy to show them the Ring camera?

25 A. I'd say happy to show it.

1 Q. Okay. And did you need some assistance from
2 your husband in trying to search for things on the Ring
3 camera?

4 A. Definitely. I don't keep passwords or anything
5 like that. So when I try to -- I know how to operate
6 it, but when I tried to see the Ring camera it says
7 password. Oh, my goodness. So I told the police
8 officers, I don't keep the password. Only my husband
9 knows the password. I said, "Unfortunately, he's
10 playing golf."

11 Q. So then what happened?

12 A. And so, they asked me is there any way you can
13 get ahold of your husband and ask him for the code. I
14 said, "Well, you're just going to have to wait a minute.
15 I don't know if I can get ahold of him because he's
16 playing golf. He doesn't always answer the phone when
17 he's playing golf."

18 Q. Okay.

19 A. So I went ahead and called, and my husband
20 didn't answer. So I left him a message. "Hey, hon, I
21 need the password to the Ring camera, because can you
22 believe, two officers came into our house looking for
23 something and they need -- they're wondering if they can
24 see the Ring camera. So I don't have the password, so
25 could you give me a call when you can?" And that was

1 it.

2 Q. All right. And did they end up going to meet
3 up with your husband instead of getting it over the
4 phone?

5 A. Well, actually, it took a long time. I don't
6 know how many minutes had gone by. My husband hasn't
7 called me yet. So I said, "Well, just wait a minute,
8 you know. He's probably -- it will be awhile before he
9 gets to his phone." And then they waited a little bit.
10 And then finally I guess they figured it was taking
11 awhile. What a while means, I don't know how long. So
12 they said, "I tell you what. Never mind. We're going
13 to send -- two officers are already on the way over
14 there to look for your husband."

15 Q. Okay. At the golf course?

16 A. Oh, yeah. Yeah.

17 Q. What were your thoughts when they told you two
18 officers were on the way to look for him?

19 A. My thoughts were -- my thoughts were, wow, this
20 has got to be something important, because why can't
21 they wait?

22 Q. Right.

23 A. So they are -- sorry. They already sent two
24 officers. Oh, my God. I wonder what this is all about?
25 You know, I couldn't wait to talk to my husband and say

1 oh, my goodness, you know, two officers. I think I may
2 have called him back. I don't know. At that point, I
3 may have called him back and left a message, you know,
4 two officers are going to be looking to find you.

5 Q. Okay.

6 A. So, you know. And I told him he was wearing --
7 I told them my husband is wearing -- I think I told him
8 the color of the shirt just so they could see it right
9 away. I ended up being wrong with the color of the
10 shirt, so...

11 Q. Did the Detectives Compton and Gay, did they go
12 in your backyard at all while they were there?

13 A. Did they go in the backyard? I don't remember
14 if they went into the backyard. Those two, I don't
15 remember.

16 Q. All right. Have you seen anyone from law
17 enforcement, the day prior on the 22nd, did you see
18 anyone in the neighborhood that day?

19 A. No.

20 Q. Okay. Did anyone else arrive at your home in
21 addition to Compton and Gay? Any other detectives?

22 A. Yep, yep, yep. When my husband -- when my
23 husband -- when my husband came home, you know, he's
24 wondering, oh, wow, you know, 'cause I told him; right?
25 I kind of told him, yeah, they were looking for the Ring

1 camera. They were here looking at it and stuff like
2 that, so -- but then I remember, I guess my husband was
3 talking to them and this and that. Is there anything
4 else you guys need? I think he let one officer come
5 into the house. And I think I wrote down his name, too.
6 So he was wearing a bright -- I guess some of the
7 officers were wearing bright blue shirts.

8 Q. Okay. That sounds like Largo colors.

9 A. Yeah. And one of them, I think, that went into
10 the home is Detective Owens. I also wrote his name
11 down, bright blue shirt.

12 Q. Detective who?

13 A. Owens. Owens.

14 Q. Okay.

15 A. I wrote it down, too; right? Bright blue
16 shirt, Detective Owens.

17 Q. Okay. Anyone else?

18 A. That day?

19 Q. Right.

20 A. Yes.

21 Q. Okay.

22 A. Okay. Wait. I think it was that same day.
23 You know, don't quote me on the date, but I know -- no,
24 it is that day. This was before my husband came home.

25 Q. Okay.

1 A. They -- there was a knock at the door and there
2 were -- and I have no idea who they are. They're
3 definitely law enforcement. And two or three gentlemen,
4 I think they're law enforcement, I think wanted to
5 get -- I didn't know what they wanted, but they wanted
6 to talk to, I think, Detective Gay and Detective Compton
7 for whatever reason, so I let them in.

8 Q. Okay.

9 A. I let them in the house, because Detective Gay
10 and Compton were still in my home.

11 Q. Okay. So at one point you had five members of
12 law enforcement in your home?

13 A. Definitely, yes.

14 Q. Okay.

15 A. I don't know, 'cause the three didn't stay too
16 long.

17 Q. Okay. And at no point in time did you see
18 anyone from law enforcement go into your backyard?

19 A. I never said that. I said Gay and Compton
20 never went.

21 Q. Okay. Who did you see go in your backyard?

22 A. I did see a few officers in the backyard.

23 Q. Do you recall who?

24 A. No, not at all. I did see them go in the --
25 they kind of asked me a little bit, can we go to your

1 dock. You know, our dock by the water. They did ask
2 me, can we go out there and take a look, and I did say
3 yes.

4 Q. Okay.

5 A. So there were a few. I mean, at least more
6 than two or three were in the backward -- my backyard.

7 Q. Sure.

8 And did you watch them go to the dock?

9 A. I didn't watch them walking to the dock -- to
10 the dock. I don't remember. I just saw them standing
11 on the dock at that point.

12 Q. Okay.

13 A. Because, see, I couldn't be in two places at
14 once because I was still with Detective Gay and Compton
15 in my house. I didn't want to leave them and go
16 outside, but you know what I mean? There was kind of
17 some over there and some in my house. So you know what
18 I mean? But I did see them on our dock.

19 Q. Okay. Do you know if any of those were
20 Detective Bolton or Detective Hunt?

21 A. I'm only familiar with Gay, Compton, and I
22 remember Detective Owens.

23 Q. Okay.

24 A. I don't remember the other detectives.

25 Q. All right.

1 A. The names, I don't remember the names.

2 Q. Sure.

3 Did you ever see any law enforcement officers
4 in close proximity to Tom Kosowski's property?

5 A. When?

6 Q. On the 23rd.

7 A. Close by -- well, you know, if they're in my
8 backyard, they're -- you know, we share a fence. And
9 it's not a -- it's a see-through fence.

10 Q. Okay.

11 A. So if they're sitting in my thing. In
12 my thought, I don't know if that's what you call close
13 proximity.

14 Q. Well, did you ever see them step onto
15 Kosowski --

16 A. No. No. But you can see -- obviously, you can
17 see. Like I said, our gate is short, so...

18 Q. So they can see his backyard from your
19 property?

20 A. No doubt.

21 Q. Okay. And you can see them, but when you saw
22 them, you never saw them actually go into his back?

23 A. No, I did not see them, no.

24 Q. All right. Any other contact with law
25 enforcement on the 23rd other than what we've talked

1 about?

2 A. Oh, gosh. I've never called them. I've never
3 called them. I don't remember, you know. I can't
4 remember. You know, I don't remember if they called me
5 once. That it might be just to say thank you and stuff,
6 but nothing -- nothing to do with, you know.

7 Q. Okay. Tell me about your relationship with Tom
8 Kosowski. What was he like as a neighbor?

9 A. Oh, really nice guy, quiet. Really nice. He's
10 quiet. He kind of kept to himself, I thought; right?
11 But really nice. Actually, we liked him as a neighbor
12 because he didn't cause any problems for us; right?
13 That's the kind of neighbor you want.

14 Q. Right.

15 A. We realize he had -- well, he has, like -- at
16 the time, he has three dogs, and so I would play with
17 the dogs in the yard, and -- no, but really nice.
18 Really nice guy, you know. So really friendly. You
19 know, really friendly. And like I said, we've gone to
20 his yard a couple times and take care of the yard
21 because he's gone. We don't know if he's there's or not
22 half the time --

23 Q. Right.

24 A. -- because he'd go somewhere. And so, we would
25 take care of his yard sometimes, and he okayed it.

1 That's about it. So he's really friendly. A good
2 neighbor to have for sure.

3 Q. Okay. Very good.

4 Anything else that I haven't asked you that you
5 think is important for us to know?

6 A. Other than -- either than them looking at the
7 Ring camera, I think that's about it. I think that's
8 about it.

9 MR. BRUNVAND: Okay. Thank you so much.

10 Mr. Vonderheide, do you have any questions?

11 MR. VONDERHEIDE: I don't have any questions.

12 Thank you for your time today.

13 THE WITNESS: All right.

14 MR. BRUNVAND: Ms. Lucidi, the -- if we
15 transcribe this, you can either read or waive
16 reading of the transcript. Your husband chose to
17 read. Do you want to read as well?

18 THE WITNESS: Yes, please.

19 (At 2:47 p.m., no further questions were
20 propounded to this witness.)
21
22
23
24
25

ERRATA SHEET

IN RE: STATE OF FLORIDA vs. TOMASZ KOSOWSKI
DEPOSITION OF: JOCELYN LUCIDI
TAKEN: 07/10/2024

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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[illegible]

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, Lori A. Seiden, RPR, FPR-C, Notary Public,
State of Florida, certify that JOCELYN LUCIDI virtually
appeared before me on the 10th day of July, 2024, and
was duly sworn.

WITNESS my hand this 14th day of January, 2025.

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

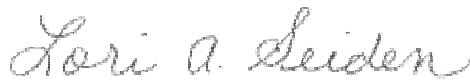
1 CERTIFICATE OF REPORTER

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 JOCELYN LUCIDI; that
9 a review of the transcript was requested; and that the
10 foregoing transcript is a true and complete record of
11 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 14th day of January, 2025.

19
20 

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

January 14, 2025

JOCELYN LUCIDI
503 Seaview Drive
Tarpon Springs, Florida 34689

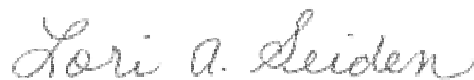
Dear Ms. Lucidi:

Your deposition taken in the case of State of Florida vs. Tomasz Kosowski on July 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, until February 14, 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,

A handwritten signature in cursive script that reads "Lori A. Seiden".

Lori A. Seiden, RPR, FPR-C