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: SERGEANT JACOB MILLER

DATE TAKEN: April 9, 2024

TIME: 9:05 a.m. to 9:46 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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- 1 The deposition of SERGEANT JACOB MILLER was taken
- 2 pursuant to notice by counsel for the Defendant on the
- 3 9th day of April, 2024, commencing at 9:05 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 SERGEANT JACOB MILLER,
- 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 do.
- 12 DIRECT EXAMINATION
- 13 BY MR. BRUNVAND:
- Q. Good morning. My name is Bjorn Brunvand. I
- 15 represent Tom Kosowski. We're here on State of Florida
- 16 vs. Tom Kosowski. Present for the State is Nathan
- 17 Vonderheide.
- If you could, please state your full name and
- 19 rank.
- 20 A. Jacob Miller, sergeant.
- 21 Q. And how are you employed?
- 22 A. With the Tarpon Springs Police Department.
- 23 Q. And how long have you been so employed?
- A. Seven and a half years.
- 25 Q. Any other law enforcement prior to that?

- 1 A. Yes, sir. Four and a half years with the
- 2 Harrington Park police in New Jersey.
- 3 Q. Okay. All right. And did you prepare a report
- 4 or multiple reports detailing your involvement in this
- 5 case?
- 6 A. Yes, sir. I have one supplement.
- 7 Q. All right. So I have supplement, and then it
- 8 has TS2237723-1. Is that your supplement?
- 9 A. Yes, sir.
- 10 Q. This is before -- have you had a chance to
- 11 review that prior to coming here today?
- 12 A. Yes, sir.
- 13 Q. Okay. And in reviewing that, does it appear to
- 14 accurately describe your involvement in the case?
- 15 A. Yes, sir, it does.
- 16 Q. Okay. So it appears that your first
- 17 involvement in this case was around 2337 hours, or about
- 18 20 minutes before midnight, on March 23rd of 2023, when
- 19 you were contacted by Detective Sergeant Jay Crawford?
- 20 A. Yes, sir.
- 21 Q. And requested to respond to 511 Seaview Drive.
- 22 Is that a typo in the report?
- 23 A. I just noticed that. Yes, it's a typo. Should
- 24 be drive, not driver.
- Q. Okay. Tell us a little bit about, what kind of

- 1 information did Sergeant Crawford -- detective -- is it
- 2 Detective Sergeant?
- A. At the time it is Detective Sergeant, yes, sir.
- 4 Q. Okay. What kind of information did he provide
- 5 you as it relates to this missing persons investigation
- 6 you were going to assist in?
- 7 A. When he contacted me via the phone it was
- 8 limited information, just requesting me to respond out
- 9 to that residence to assist Largo Police Department.
- 10 They were investigating a missing persons case, and he
- 11 would brief me further when I got to the scene.
- 12 I arrived just after midnight and -- on the
- 13 24th, where I made contact with a person. And he
- 14 provided more detail as far as the time frame of the
- 15 case, some names of individuals that were involved in
- 16 the investigation that Largo police had coordinated with
- 17 obtaining a search warrant for the residence, and that
- 18 we were there to assist Largo police with executing a
- 19 search warrant.
- 20 O. Okay. And so tell us about that additional
- 21 information that he provided you with, the names, you
- 22 said, the facts. Just give me as many details as you
- 23 can about what information was provided to you when you
- 24 arrived at the scene. I think it says approximately
- 25 four minutes past midnight, right, on the 24th?

- 1 A. Yes, sir. So yeah. That was pretty much the
- 2 basics from him. I learned more when I was provided a
- 3 copy of the search warrant where I was able to see, you
- 4 know, the facts of the case relevant to the search
- 5 warrant as far as what Largo police had established, you
- 6 know, based on the timelines and persons involved on
- 7 their investigation, and then the scope of their search
- 8 warrant on what they were looking for evidentiary
- 9 purpose.
- 10 Q. Okay. So do I understand correctly that you,
- 11 in fact, reviewed the affidavit in support of the search
- 12 warrant?
- 13 A. I was provided a copy of the search warrant at
- 14 the scene. And, correct, I did review, you know, that
- 15 more -- most likely in its entirety, but scanned over,
- 16 you know, a good portion of it, keying in more on what
- 17 the scope was of what we were actually -- what the
- 18 search was for for evidence that they were looking to
- 19 collect.
- 20 Q. What do you recall about the details of what
- 21 the search was for?
- 22 A. It was related to a vehicle, to various
- 23 clothing, suitcase or container, a wagon, a blanket.
- 24 Again, just the specifics that were identified in the
- 25 search warrant itself.

- 1 Q. Okay. Other than what's set forth in the
- 2 affidavit, do you recall who authored that affidavit?
- 3 A. In review of it, it was a Largo police
- 4 Detective Bolton, Colin Bolton.
- 5 Q. Okay. All right. Have you reviewed that
- 6 affidavit recently?
- 7 A. Yes, sir, this morning.
- 8 Q. Okay. So do you have a copy of it in front of
- 9 you?
- 10 A. I do, sir.
- 11 Q. Okay. All right. And how many pages is the
- 12 actual narrative of that?
- 13 A. The entirety of what I have is -- the affidavit
- 14 is eight pages and the search warrant is four, so
- 15 12 pages altogether.
- 16 Q. Okay. All right. Beyond the four corners of
- 17 the affidavit, did anyone else provide you with any
- 18 information as it relates to what you were about to do
- 19 as far as the search of the residence?
- 20 A. No, sir.
- 21 Q. Okay. When you say that in your report it
- 22 says, "I was briefed on the circumstances of the
- 23 incident to that point. It was advised that Tarpon
- 24 Springs Police Department would assist Largo Police
- 25 Department at the residence while a search warrant was

- 1 executed," what does that mean?
- 2 A. That was my understanding with it being a Largo
- 3 Police Department investigation due to jurisdictional
- 4 boundaries or restrictions, that the search warrant had
- 5 to be executed by Tarpon Springs police, whereas
- 6 enumerated within the search warrant to provide Tarpon
- 7 Springs police and Pinellas County Sheriff's Office
- 8 forensics the ability to execute a search.
- 9 Q. Okay. But was it Largo police that sort of
- 10 directed where to search and what to search for and
- 11 Tarpon Springs sort of was an extension of Largo police,
- 12 or how did that work?
- 13 A. That was my understanding.
- 14 Q. Okay. All right. Do you know whether or not
- 15 when you arrived at the residence, do you know whether
- 16 the SWAT team had entered the residence and cleared the
- 17 residence, or does that happen while you were there?
- 18 A. That had happened prior to me being called out.
- 19 Q. Okay. You then indicate that once Pinellas
- 20 County Sheriff's Office forensics completed
- 21 memorializing the residence you were then assigned to
- 22 assist with the search of the residence; correct?
- 23 A. Yes, sir.
- Q. What does that mean, "once Pinellas County
- 25 Sheriff's Office forensics completed the memorializing

- 1 the residence"?
- 2 A. They memorialized the interior of the residence
- 3 through photographs, through video, whatever kind of
- 4 imaging that they utilized. I'm not sure to what extent
- 5 they did that.
- 6 Q. Okay. So do you know how long they were inside
- 7 doing that prior to?
- 8 A. I do not. They were inside processing the
- 9 scene when I arrived.
- 10 Q. Okay. Do you know who else might have been
- 11 inside the scene when you arrived or prior to your
- 12 arrival?
- 13 A. I do not.
- 14 Q. Okay. When you started actually participating
- in the search of the residence, were there other members
- 16 of Largo Police Department who were already inside the
- 17 residence?
- 18 A. I don't know if there's anybody already inside
- 19 of the residence when I entered. I entered with Largo
- 20 detective, Detective Moore and Assistant State Attorney
- 21 Alex Spadaro. I'm not sure if anybody was inside prior
- 22 to me entering at that point. This is before.
- Q. Excuse me one second. Oh, by the way, I forgot
- 24 to push the record button. Are you okay with us
- 25 recording the deposition?

- 1 A. I am, yes, sir.
- 2 Q. Okay. I neglected to start the recording
- 3 initially. And off video, Sergeant Miller indicated
- 4 that he's not opposed to having it recorded. Okay.
- 5 Let's see. So tell us about the part of the
- 6 search that you were assigned to assist in.
- 7 A. I was designated to work on the, I guess what
- 8 would be the second floor, the main living area of the
- 9 residence. I entered through the garage, moved to the
- 10 south to a stairwell, and then up the stairwell to the
- 11 second floor living area of the quarters.
- 12 Q. Okay. In your report there's some reference to
- 13 you entering through the garage door and then seeing the
- 14 door that leads to the residence. Then it says, "A tow
- 15 truck was requested to respond for a vehicle impound for
- 16 the Toyota Tundra parked in the garage related to the
- 17 search warrant."
- Is that happening before you go upstairs, or...
- 19 A. The vehicle was still in the garage when I was
- 20 inside the residence. I don't recall what time or when
- 21 the tow truck showed up at that point, if it was during
- 22 or after.
- Q. Did you have any involvement in scheduling the
- 24 tow truck?
- 25 A. No. An officer on scene, Officer Reyes, was

- 1 requested to complete paperwork for the property impound
- 2 of the vehicle itself, and he would have coordinated
- 3 with dispatch for the tow.
- 4 Q. Were you present when the truck was placed on
- 5 the tow truck?
- 6 A. I was at the scene. I don't recall if I was
- 7 specifically standing watching the vehicle get loaded,
- 8 but I was on the scene.
- 9 Q. Okay. And do you know whether or not the --
- 10 when you say "loaded," was this like one of those
- 11 flatbed trucks that the truck was loaded on top of a
- 12 flatbed? Was it like an old-fashioned tow truck, if you
- 13 recall?
- 14 A. From my recollection, I believe it was a
- 15 flatbed.
- 16 Q. Okay. All right. But you don't specifically
- 17 recall actually witnessing it being placed on the
- 18 flatbed?
- 19 A. No, I do not.
- 20 Q. And when you entered the garage and you're
- 21 walking through the garage, do you notice anything
- 22 unusual during your walk through the garage?
- A. I'm not sure what "unusual" would constitute,
- 24 but --
- 25 Q. Well --

- 1 A. -- normal things that you would see in a
- 2 garage.
- 3 Q. Well, anything that you thought stood out as
- 4 being noteworthy as it relates to an ongoing
- 5 investigation.
- 6 A. There is a vehicle in the garage. There was an
- 7 extra -- I believe there was a weight bench.
- 8 Q. Okay.
- 9 A. Outside of that, no.
- 10 Q. Outside of what we just discussed, outside of
- 11 what's listed specifically in your report, nothing else
- 12 out of the ordinary?
- 13 A. No.
- 14 Q. Okay.
- 15 A. I entered the garage, passed through, and went
- 16 to the stairwell. I was assigned to the second floor,
- 17 so that's where I focused my attention.
- 18 O. It was dark outside, I assume?
- 19 A. Yes, sir.
- 20 Q. But can I also assume that there were lights on
- 21 in the garage?
- 22 A. I believe there were, but, again, I don't
- 23 recall. At some point they would have been turned on.
- Q. I mean, if you were walking in a pitch black
- 25 garage, do you think you would remember?

- 1 A. Well, I mean, we use flashlights regularly, but
- 2 when I entered, I don't know if the lights were
- 3 necessarily on when I entered or if they were turned on
- 4 while I was inside. At some point they were turned on.
- 5 Q. So of the sheriff forensics had already done
- 6 the video processing of and photo processing. And based
- 7 on your experience and background, do you think it's
- 8 likely that probably the lights were on in the garage
- 9 and the rest of the house?
- 10 A. Probably, yes.
- 11 Q. Okay. Okay. So tell me about the search of
- 12 the upper level of the home.
- 13 A. Again, I was accompanied by Largo police
- 14 Detective Moore and ASA Spadaro, and we just started a
- 15 methodical search room by room going through closets,
- 16 bathroom, bedroom. I opened doors, dressers, cabinets,
- 17 for the Largo detective to view to, again, try to
- 18 identify any evidence related to their investigation.
- 19 Q. Did the Largo detective open any drawers or
- 20 any?
- 21 A. No. It was discussed prior to that. That was
- 22 my task to physically do the search.
- Q. Did he direct you, ask you what to open and
- 24 what not to open?
- 25 A. No. Again, just based on the scope of the

- 1 search warrant and my understanding, you know, the items
- 2 such as clothing, trace evidence was being sought. And
- 3 my experience, you know, conducting the search, I had
- 4 opened, again, drawers or cabinets or closets where
- 5 those items could reasonably be stored.
- 6 Q. In your report you reference entering the
- 7 residential portion of the ground level from the garage
- 8 "where I viewed Toyota vehicle keys and a large plastic
- 9 bin filled with dog food."
- 10 Is that -- do I understand that to be at the
- 11 garage level, or is that at the upper level?
- 12 A. That was the garage level. There's a door that
- is separated the garage itself from, like, the lower
- 14 landing of the staircase. That bin would have been
- 15 there. From my recollection, they were looking for keys
- 16 in the area that may have been to that vehicle. And I
- 17 observed Toyota keys and identified those through the
- 18 forensics unit.
- 19 Q. That took place before you started the search
- 20 upstairs; right?
- 21 A. That was my initial entry into that area of the
- 22 residence, yes, before I did the search upstairs.
- 23 Q. What was the involvement of Assistant Attorney
- 24 Alex Spadaro?
- 25 A. I believe to observe, but I can't speak to --

- 1 Q. Right.
- But, I mean, did she assist in the search or
- 3 just observe? Do you recall?
- 4 A. Just observe.
- 5 Q. Okay. All right. Did you mark items of
- 6 potential evidence, or how did that work?
- 7 A. There is a Pinellas sheriff's office forensics
- 8 specialist that was with us, and as we identified
- 9 particular evidence or items to be collected, they were
- 10 photographed as they were found and collected by that
- 11 forensic specialist.
- 12 Q. Okay. So, presumably, the way this works, and
- 13 correct me if I'm wrong, but do you -- so you're doing
- 14 the search. Is it Detective Moore?
- 15 A. Detective Moore was with me, yes.
- 16 Q. Detective Moore says, "That's something that's
- 17 potential evidence." And then who instructs the
- 18 forensic person to collect it and photograph it?
- 19 A. If it was identified as potential evidence, I
- 20 would instruct the forensic specialist to, again,
- 21 photograph it in place, and then they would collect it.
- 22 Q. Okay. Were you present for the reading of the
- 23 search warrant?
- 24 A. I was not.
- 25 Q. And you indicated that the search warrant was

- 1 left on the kitchen counter when the residence was
- 2 secured.
- 3 I assume this is at the conclusion of the
- 4 search?
- 5 A. Yes, sir.
- 6 Q. And when you say "the search warrant was left,"
- 7 are you talking strictly the search warrant, not the
- 8 affidavit itself in support of it, or both?
- 9 A. I do not recall, sir. This is before.
- 10 Q. Okay. What is normal? What's your normal
- 11 practice with Tarpon Springs, if you know?
- 12 A. I don't. I've never been involved in that part
- 13 of a search warrant before.
- 14 Q. Okay. All right. How long would you say you
- 15 and Detective Moore and the Assistant State Attorney
- 16 Alex Spadaro, how long would you say the three of you
- 17 were involved in the search of the upper level?
- 18 A. I don't believe I can speculate on that, or
- 19 estimate. I can probably look at --
- 20 Q. Are we talking minutes? Are we talking hours?
- 21 A. Not minutes; hours.
- 22 Q. Okay.
- 23 A. An hour. I'm hesitant to speculate on
- 24 approximating time, but...
- 25 Q. Did you wear a body cam recording device at the

- 1 time?
- 2 A. I did not.
- 3 Q. And any particular reason why you were not
- 4 wearing a body cam recording device?
- 5 A. My initial contact with Detective Sergeant
- 6 Crawford, I asked if our body cameras are going to be
- 7 utilized. Sheriff's forensics was going to be
- 8 memorializing the search with photographs and through
- 9 video and other imaging, and that it would not be needed
- 10 for us to utilize body cams.
- 11 Q. Was it -- so you had access to body cams, but
- 12 because it was being recorded by Pinellas County
- 13 sheriff, it was decided not to use them at the time?
- 14 A. I was advised that we were not using them for
- 15 the search, correct.
- 16 Q. By Sergeant Crawford?
- 17 A. Yes, sir.
- 18 Q. Okay. And so did -- this is before. So did
- 19 Pinellas County sheriff actually video record the search
- 20 or just photograph items that were being secured as
- 21 evidence?
- 22 A. I don't know. I haven't seen their case file.
- 23 I haven't seen the entirety of the case file. I'm not
- 24 sure what forensic evidence they collected, but I know
- 25 they were doing imaging on scene.

- 1 Q. Do you recall anyone following you during the
- 2 search and recording what was taking place?
- 3 A. Again, there was a forensic specialist that was
- 4 with us that was at minimum photographing as we were
- 5 going into rooms and identifying evidence so that --
- 6 with them collecting the evidence.
- 7 Q. Okay. Okay. But no recollection of someone
- 8 walking around with a video camera recording the entire
- 9 event?
- 10 A. Not to my recollection, but, again, I'm not
- 11 sure if that happened prior to or during while we were
- 12 in there.
- 13 O. Understood.
- 14 The search warrant that was left in the
- 15 residence, did that include an inventory of the items of
- 16 evidence that had been seized?
- 17 A. I do not know.
- 18 Q. Do you have a copy of the inventory? I know
- 19 you said you have a copy of the search warrant itself
- 20 and the affidavit.
- 21 A. I don't. I only have the copy of the affidavit
- 22 and search warrant.
- 23 Q. And do you know who actually completed the
- 24 inventory?
- 25 A. I do not know.

- 1 Q. And I think you had indicated that, correct me
- 2 if I'm wrong, but you were not present when the search
- 3 warrant was read?
- 4 A. Correct, I was not present.
- 5 Q. Okay. Do you know whether or not the practice
- 6 would be to read the search warrant in its entirety
- 7 before the search?
- 8 A. That would be the practice, my understanding,
- 9 yes.
- 10 Q. Okay. Did that happen in your presence?
- 11 A. No, it did not happen in my presence. I was
- 12 not there.
- 13 Q. Okay. Other than Detective Moore and Assistant
- 14 State Attorney Alex Spadaro, was anyone else -- and the
- 15 forensic persons, anyone else part of the team that you
- 16 were associated with for purposes of the search?
- 17 A. Not to my recollection. I believe it was just
- 18 the four of us.
- 19 Q. And do you recall the name of the forensic
- 20 investigator who was part of the team with you and
- 21 Assistant State Attorney Spadaro and Detective Moore?
- 22 A. I do not.
- Q. Is it a man or a woman?
- 24 A. It was a female.
- Q. Were there multiple search teams?

- 1 A. I coordinated on the -- for the second floor,
- 2 the living area, and then Detective Sergeant Crawford
- 3 was in the garage on the main level.
- 4 Q. Okay. So when you say "second floor in the
- 5 living area," are you talking the entire second floor?
- 6 A. Yes.
- 7 Q. So the kitchen, living room, the bedrooms, the
- 8 bathrooms, everything on the second floor?
- 9 A. Yes, sir.
- 10 Q. A guitar room?
- 11 A. Yes, sir.
- 12 Q. Okay. Did you have to break down the door to
- 13 get into any of the rooms?
- 14 A. I did not, no.
- 15 Q. Do you know whether or not doors had been
- 16 broken down prior to you starting the search?
- 17 A. Yeah. It was my understanding that the SWAT
- 18 element did have to breach doors. I don't know how many
- 19 or which ones. It was my understanding that doors were
- 20 breached by the SWAT element.
- 21 Q. Do you know whether or not that included the
- 22 room with all the guitars?
- 23 A. I believe it did.
- Q. So, basically, am I correct, then, there were
- 25 two search teams; your team that was on the upper floor

- 1 or the residence portion and then Crawford's team that
- 2 was on the garage level?
- 3 A. Yes, sir.
- 4 Q. What about the backyard, the dock?
- 5 A. I recall at one point we were in the backyard
- 6 and we did walk around the rear of the property.
- 7 Q. Okay. Did you search the rear of the property?
- 8 A. We visually observed it. We walked the
- 9 property with flashlights.
- 10 Q. Do you recall whether or not anything of
- 11 evidentiary value was seized from the backyard of the
- 12 property?
- 13 A. I do not recall. I don't believe so.
- 14 Q. Okay. Was Detective Compton involved in the
- 15 search of the residence, of the second level with Largo
- 16 PD?
- 17 A. I do not know.
- 18 Q. So I quess I'm a little confused, because your
- 19 team is in charge of the second level, the residential
- 20 part --
- 21 A. Correct.
- 22 Q. -- which is, there's four of you?
- 23 A. The four of us were the only ones that were
- 24 part of the search element. So outside of that, I don't
- 25 know what other involvement another detective would have

- 1 had.
- 2 Q. Were there other Largo detectives roaming
- 3 around the second floor while you were conducting the
- 4 search?
- 5 A. Not that I recall.
- 6 Q. Is that something that you would recall if, in
- 7 fact, there were someone else roaming around?
- 8 A. I would believe so.
- 9 Q. Okay. I believe Detective Compton -- I might
- 10 be mistaken, but I believe Detective Compton, in a
- 11 previous deposition, talked about finding some lingerie
- 12 in the house.
- Do you know anything about what that was?
- 14 A. In the master bedroom closet either on the
- 15 floor or in a suitcase, there was clothing.
- 16 Q. Including lingerie?
- 17 A. To my recollection, yes.
- 18 Q. Do you know what the significance of that was?
- 19 A. I do not.
- Q. Well, do you know whether or not it was seized
- 21 as evidence?
- 22 A. I do not.
- 23 Q. Do you know who found the lingerie?
- 24 A. It would have been discovered while we were
- 25 conducting the search.

- 1 Q. The team of the four of you?
- 2 A. Correct.
- Q. Okay. And from -- based on your recollection,
- 4 there wouldn't -- would not have involved any other
- 5 members of law enforcement other than the four of you?
- 6 A. For the majority of the search, as we conducted
- 7 it, it was the four of us. If another detective joined,
- 8 Detective Moore, at some point, intermittently or
- 9 sporadically, that may have occurred, but the four of us
- 10 are the ones that were part of the search element or
- 11 observation there.
- 12 Q. Did you have entry contact with or see
- 13 Detective Bolton or Detective Hunt in the garage area of
- 14 the residence?
- 15 A. I did not know. I don't even know what they
- 16 look like. I don't know them.
- 17 Q. Okay. Do you recall seeing anyone at the
- 18 search scene in the garage area wearing any type of shoe
- 19 covers, protective shoe covers?
- 20 A. I don't recall.
- Q. I'm sorry?
- 22 A. I don't recall. I was not.
- Q. Okay. Is that something you would have
- 24 remembered, if people were wearing protective shoe
- 25 covers?

- 1 A. I would have remembered if I was. I wouldn't
- 2 necessarily remember if others were or weren't.
- 3 Q. Is that something you, yourself, have worn from
- 4 time to time in the past going through crime scenes?
- 5 A. It is on a couple of occasions.
- 6 Q. Okay. And I think you already answered this,
- 7 but just to be sure, you don't recall anyone wearing
- 8 protective shoe covers in the garage or anywhere else on
- 9 the property?
- 10 A. I do not recall that.
- 11 Q. Okay. Do you know whether or not the Toyota
- 12 Tundra was driven out of the car [sic] prior to being
- 13 put on the bed truck, the tow truck?
- 14 A. I do not know.
- 15 Q. Okay. Is that something that happened outside
- of your presence? Whatever happened with the truck, did
- it happen outside your presence?
- 18 A. I believe so. All I recall saying is the tow
- 19 truck arrive on scene -- the flatbed arrive on scene.
- 20 Further from that, I didn't have interaction with the
- 21 vehicle being loaded on the tow truck.
- 22 Q. Okay. Do you have any information or any
- 23 knowledge as to when the Pinellas County sheriff's
- 24 forensic team applied their seal to the doors and the
- 25 tailgate on the truck?

- 1 A. I do not.
- 2 Q. Do you recall whether or not the -- whether or
- 3 not the truck bed had some sort of a cover?
- A. I don't recall. I don't believe it did, but I
- 5 can't say for certain.
- 6 Q. Okay. You had indicated, I think, that you had
- 7 asked Officer Reyes to complete the vehicle impound form
- 8 on the truck.
- 9 Did you request that while the truck was still
- 10 inside the garage?
- 11 A. I don't recall. It's just part of our
- 12 department policy that the vehicle impound form needs to
- 13 be completed. He would have been tasked with that since
- 14 he had a marked vehicle with a printer capable to do
- 15 that paperwork.
- 16 Q. Who would have taken custody of the truck?
- 17 A. I do not know.
- 18 Q. Did Reyes at some point have the responsibility
- 19 for the truck or the initial impound on the truck or...
- 20 A. I do not know.
- 21 Q. Do you know if anyone from Tarpon Springs
- 22 Police Department accompanied the truck on its way to
- 23 the forensic processing garage?
- 24 A. I do not know if anybody from Tarpon did that.
- 25 Q. Do you know if anyone from Largo PD accompanied

- 1 the truck to the forensic processing garage?
- A. I do not know that either.
- 3 Q. Do you know what agency Lieutenant Gross is
- 4 with?
- 5 A. I do not.
- 6 Q. Do you know whether Lieutenant Gross had any
- 7 involvement in the transportation of the truck to the
- 8 forensic processing garage?
- 9 A. I do not know. I'm not familiar with who
- 10 Lieutenant Gross is.
- 11 Q. Okay. Okay. Did Assistant State Attorney Alex
- 12 Spadaro search any of the contents of the 511 Seaview
- 13 address?
- 14 A. She accompanied us. She did not perform any
- 15 search.
- 16 Q. I think you already answered this, but the
- 17 purpose of her being there was what?
- 18 A. Her purpose of being there, I can't speak to
- 19 her purpose, but it would be my understanding to
- 20 observe, you know, the process of the search and what
- 21 evidence was revealed or documented.
- 22 Q. Right. I think that's what you had indicated
- 23 earlier.
- 24 Any other purpose beyond that that you can
- 25 think of?

1 Α. No, sir. Okay. Anything else that you did in this case 2 Q. 3 that's not set forth in your report or that we have not discussed here this morning? 5 Α. No, sir. 6 MR. BRUNVAND: All right. I greatly appreciate 7 it. I don't know if the State has any questions. MR. VONDERHEIDE: I have no questions. 9 MR. BRUNVAND: Okay. Sergeant, if this is 10 transcribed, would you like to read or waive? THE WITNESS: Read, please. 11 12 MR. BRUNVAND: All right. So I'm going to stop 13 the recording, and we're going to let Lori get your 14 contact information for purposes of reading the 15 transcript. 16 (At 9:46 a.m., no further questions were 17 propounded to this witness.) 18 19 20 21 22

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Page 29 1 ERRATA SHEET 2 IN RE: STATE OF FLORIDA vs. TOMASZ KOSOWSKI DEPOSITION OF: SERGEANT JACOB MILLER 3 TAKEN: 04/09/2024 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE 4 5 Please sign, date, and return this sheet to our office. If additional lines are required for corrections, attach additional sheets. 6 7 At the time of the reading and signing of the deposition the following changes were noted: 8 9 PAGE LINE CORRECTION REASON 10 11 12 13 14 15 16 17 18 19 20 21 22 Under penalty of perjury, I declare that I have read my deposition and that it is true and correct subject to 23 any changes in form or substance entered here. SIGNATURE OF DEPONENT: 24 25

Page 30 1 CERTIFICATE OF OATH 2 3 STATE OF FLORIDA COUNTY OF PINELLAS 5 I, Lori A. Seiden, RPR, FPR-C, Notary Public, 6 State of Florida, certify that SERGEANT JACOB MILLER virtually appeared before me on the 9th day of 9 April, 2024, and was duly sworn. 10 WITNESS my hand this 26th day of De 11 12 Lori a Leiden 13 14 Lori A. Seiden, RPR, FPR-C 15 Notary Public - State of Florida 16 My Commission No.: HH 226917 17 My Commission Expires: June 6, 2026 18 19 20 21 22 23 24 25

Page 32 December 26, 2024 1 SERGEANT JACOB MILLER 3 Tarpon Springs Police Department 4 444 South Huey Avenue Tarpon Springs, Florida 34689 5 6 Dear Sergeant Miller: 7 Your deposition taken in the case of State of 8 Florida vs. Tomasz Kosowski on April 9, 2024, has been transcribed. Per your request to review the transcript, it is being held at our office at 728 South 10 New York Avenue, Lakeland, Florida, until January 26, 11 12 2025. 13 Please call (863) 682-8737 to make arrangements to do this during our regular business hours of 8:30 a.m. 14 15 to 5:00 p.m. 16 Thank you for your prompt attention to this matter. 17 18 Sincerely, 19 Lori a Leiden 20 21 2.2 Lori A. Seiden, RPR, FPR-C 23 24 25