

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 MELISA MORAS

DATE TAKEN: SEPTEMBER 13, 2023

TIME: 2:16 p.m. - 2:29 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:

AMANDA POWERS SELLERS, Esquire  
Amanda Powers Sellers, P.A.  
6344 Roosevelt Blvd.  
Clearwater, Florida 33760-1803

I N D E X

SEPTEMBER 13, 2023

WITNESS

Called by the Defendant:

MELISA MORAS

DIRECT EXAMINATION BY MS. SELLERS..... 4

CERTIFICATE OF OATH..... 15

CERTIFICATE OF REPORTER..... 16

THE COURT REPORTER: Would you raise your right hand, please. Do you swear or affirm the testimony you shall give in this cause shall be the truth, the whole truth, and nothing but the truth?

THE WITNESS: I do.

MELISA MORAS, called as a witness by the Defendant, having been virtually duly sworn, testified as follows:

DIRECT EXAMINATION

BY MS. SELLERS:

Q Ms. Moras, my name is Amanda Sellers. I represent Dr. Kosowski. And you've been subpoenaed today for us to take your deposition.

A Um-hum.

Q You're listed as a witness by the State. And honestly your depo's going to be rather short. I do have to get through a few questions before I get to the details that I really am interested in.

A Okay.

Q So first let me have you state your full name.

A Melisa Colliette Moras.

Q Okay. And I have you as Lisa. So your name --

1           A     Yeah, that's what I go by.

2           Q     Okay. But your legal name is Melisa?

3           A     Melisa, yeah.

4           Q     Got it. What is your date of birth?

5           A     6/26/65.

6           Q     Can you spell Melisa so that I make sure I  
7 have that correct.

8           A     Yeah. It's M-e-l-i-s-a.

9           Q     Easy enough. Have you ever given a  
10 deposition before?

11          A     No.

12          Q     All right. So I'll give you a little bit  
13 of a quick intro. Your only job is to tell the  
14 truth. If you don't know, just say I don't know.  
15 There's no right or wrong answer. And if you don't  
16 understand a question that I ask, just let me know,  
17 I'll rephrase it.

18          A     Okay.

19          Q     The -- first of all, do you have -- have  
20 you take any medication? Are you under the  
21 influence of any drugs or alcohol which could affect  
22 your ability to understand what's going on?

23          A     Nothing except my thyroid medicine.

24          Q     All right. And you currently live in  
25 Pinellas County?

1 A I do.

2 Q How long have you lived here?

3 A Continuously since September 4th of 2021.

4 Q Okay. Where'd you live before here?

5 A California.

6 Q Oh, you're the second California person.

7 A And before that I lived here again and  
8 before that it was California.

9 Q Okay. I ask this in every case. It's not  
10 directed to you. Have you ever been arrested or had  
11 to appear in court for a criminal charge?

12 A I've been arrested, but I was let go  
13 because they had the wrong person. That's about it.

14 Q Okay. So you never had to appear in court  
15 for that?

16 A Only for traffic ticket.

17 Q Okay. Where did that happen?

18 A California.

19 Q Okay. In what part of California?

20 A Northern.

21 Q Can you give me the county.

22 A Napa.

23 Q It's not really going to become relevant,  
24 but I got to take the information anyway.

25 A Oh, that's fine. Yeah.

1           Q     Did you -- have you spoken to anyone about  
2     this case? I mean when you got your subpoena, did  
3     you talk to anyone about, hey, I got to go and  
4     testify?

5           A     Just my lawyer. Because she was home when  
6     the subpoena came, I was at work. So she asked me  
7     what it was for and I was like I'm not sure. Then I  
8     saw the name and I was like, oh, okay, it's for  
9     something that happened at my old job.

10          Q     Does she --

11          A     That was the extent of it.

12          Q     Does she represent you as a witness on  
13     this case?

14          A     No.

15          Q     Okay.

16          A     She is a lawyer, but she's a consumer  
17     lawyer and she's not actually my lawyer. She's --  
18     right now she's just my roommate.

19          Q     Okay. Excellent. Were you working on  
20     March 21st, 2023?

21          A     I was.

22          Q     And do you remember what time you arrived  
23     at the office?

24          A     About 7:50.

25          Q     And where exactly do you work?

1           A     Well, right now I'm at East Bay Animal  
2     Hospital at 3445 East Bay Drive. Then I was at  
3     510- -- 1501 Belcher Road South in Largo.

4           Q     And what was the --

5           A     I was --

6           Q     -- the name --

7           A     Tampa Bay Veterinary Specialists.

8           Q     Okay. So when did you leave Tampa Bay  
9     Vet?

10          A     June 6th.

11          Q     Have you been in contact with your former  
12     coworkers?

13          A     Not at all.

14          Q     All right. So you recall arriving at the  
15     office at what time?

16          A     About 7:50. I usually got there about ten  
17     minutes before my shift started.

18          Q     And how did you enter?

19          A     Through the -- well, it's actually the  
20     main doors. It's two double doors. It's right in  
21     between the two buildings, 1501A and B. I was  
22     working in B. It was right next to the law office.

23          Q     When you arrived, did you see anyone  
24     around?

25          A     Just one of, one of my coworkers that



1 opened the door for me.

2 Q Who was that?

3 A I think her name was Deborah.

4 Q And, Ms. Moras, you're making me dizzy.

5 Do you mind --

6 A I'm sorry.

7 Q No, I get it. Because I'm a multitasker  
8 and so I get it. Thank you.

9 A I'm sorry.

10 Q Take a break. Take a load off.

11 So your former coworker, who did you say  
12 that was again?

13 A I think her name's Deborah. I'm not  
14 really sure.

15 Q Okay.

16 A I didn't see her much.

17 Q Did -- was anything out of the ordinary  
18 when you arrived that morning?

19 A Not, not when I arrived, no.

20 Q Okay. You say not when I arrived. So  
21 tell me when the day started going a little bit  
22 sideways.

23 A It was like 9:00, 9:30 all of a sudden me  
24 and my coworker Diane started smelling this really  
25 strong smell of bleach. When we went to go find out

1 where it was coming from, somebody from the law  
2 office came and said, hey, have you seen Steve, we  
3 haven't seen him in a while and his keys are here,  
4 his wallet's here, and his phone's here. And we're  
5 like, no, haven't seen Steve.

6 Q Do you remember who it was from the law  
7 office that came and asked you that?

8 A I don't know her name. I just know she  
9 had dark hair.

10 Q Okay.

11 A About shoulder length.

12 Q Well, that narrows it down. Because I  
13 think there's one female that works in that office.  
14 And you said that's around 9:00 or 9:30. How do you  
15 know -- why does that time stick out to you?

16 A Just the amount of time I had been there  
17 and who was -- and who had yet to arrive.

18 Q Okay.

19 A Because I got there, I was -- I clocked in  
20 at 8:00. We had a couple of other people that  
21 clocked in at 10:00. And it was after I clocked in  
22 and a bit before they clocked in. So it was right  
23 in between that time. It was sometime between 9:00  
24 and 10:00.

25 Q Okay. After -- where were you when the,

1 the lawyer or the individual from the law office  
2 approached you and asked you where Steve was or if  
3 you had seen Steve?

4 A I was in the hallway between the men's and  
5 women's bathrooms.

6 Q And when you started smelling the bleach,  
7 where were you?

8 A I was in my office, which is about 50 feet  
9 around one corner from the bathroom.

10 Q Were you able to tell once you walked out  
11 into the hallway where that bleach was coming from,  
12 that bleach smell?

13 A No. We just followed it to the bathroom  
14 because it was getting stronger and stronger.

15 Q And when you say to the bathroom, was that  
16 the male restroom?

17 A Yeah, the male -- as you walk from my  
18 office, the male's -- the men's restroom is the  
19 first one you come across and then the women's is  
20 just down a little bit from that probably about  
21 twenty feet. Not even twenty feet. About eight.

22 Q Did you go into the men's restroom?

23 A Opened the door. Did not go in.

24 Q What did you see when you opened the door?

25 A Well, the bleach kind of hit you in the

1 face and it just was like -- it's hard to explain.  
2 It was -- my coworker thought she saw blood, but I  
3 was just -- my eyes were watering so bad from the  
4 bleach I just noticed it was like in disarray.

5 Q And your coworker, are you referring to  
6 Deb? Is that Deborah Henrichs?

7 A Deborah. Yeah, I think that is her.

8 Q Okay. Did she point out blood to you or  
9 did she just say, you know, I think there's blood in  
10 there?

11 A Just kind of said I think that's blood.  
12 And I was like I can't see anything, my eyes are  
13 watering so bad.

14 Q What did you do after you looked into the  
15 restroom?

16 A I had to go back to work.

17 Q And how long were you working before  
18 anything else happened that day?

19 A Couple hours.

20 Q And then what happened?

21 A I think the police showed up that  
22 after- -- early that afternoon.

23 Q Did they come to your office?

24 A They did. But I'm -- to be honest with  
25 you, I can't remember if it was that same day or the

1 next day. It might have been the next day.

2 Q Do you remember --

3 A Oh, go ahead.

4 Q Do you remember speaking to a specific  
5 detective?

6 A I did. And I cannot remember his name for  
7 the life of me, I'm sorry. It was a while ago.

8 Q That's okay. That's okay. I believe it  
9 was Detective Allred. Does that ring a bell?

10 A That sounds right.

11 Q And what did you tell Detective Allred?

12 A Just the same thing I just told you. I  
13 smelled bleach and somebody was asking where Steven  
14 was.

15 Q Okay. Have you ever seen -- how long were  
16 you working for Tampa Bay Vet?

17 A About four months.

18 Q In those four months, did you ever see  
19 individuals in or around the office, homeless,  
20 transients using drugs that should not have been in  
21 that area?

22 A No. Just saw a couple people, like, I'd  
23 come to work, like, walking down the sidewalk maybe  
24 talking to themselves. But not hanging out actually  
25 on the property, no.

1           Q     Okay. Are you aware of any incidents  
2 where individuals had gotten inside the building  
3 that were not supposed to be inside the building?

4           A     No.

5           Q     Anything else that you can think of that  
6 you did not tell detectives or you did tell  
7 detectives and I haven't asked you about?

8           A     No. No, my involvement was really  
9 minimal.

10           MS. SELLERS: Okay, I don't have any more  
11 questions for you.

12           MR. VONDERHEIDE: I don't have any  
13 questions.

14           MS. SPADARO: No questions.

15           MS. SELLERS: Ms. Moras, you can opt to  
16 read your deposition, review it, before it  
17 becomes a part of the record or you can waive  
18 and you don't have to read it. It's up to you.

19           THE WITNESS: Yeah, I'll waive it. That's  
20 fine.

21           (The deposition was concluded at 2:29  
22 p.m.)

CERTIFICATE OF OATH

STATE OF FLORIDA     )  
COUNTY OF POLK       )

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

WITNESS my hand and official seal this, 19th  
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 MELISA MORAS, 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 19th day of December 2024.

18  
19 

20  
21 TAMMY KELLEY  
22  
23  
24  
25