

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: NICHOLAS LUCIDI

DATE TAKEN: July 10, 2024

TIME: 2:06 p.m. to 2:30 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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C O N T E N T S

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EXHIBITS	NONE

1 The deposition of NICHOLAS LUCIDI was taken
2 pursuant to notice by counsel for the Defendant on the
3 10th day of July, 2024, commencing at 2:06 p.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 NICHOLAS LUCIDI,
9 a witness, having been duly sworn to tell the truth,
10 was examined and testified upon his oath as follows:

11 THE WITNESS: Yes.

12 DIRECT EXAMINATION

13 BY MR. BRUNVAND:

14 Q. So my name is Bjorn Brunvand. I represent Tom
15 Kosowski. We're here on State of Florida vs. Tomasz
16 Kosowoski.

17 If you could, please state your name.

18 A. Nicholas Lucidi.

19 Q. And Mr. Lucidi, the -- you've been listed as a
20 witness in this case. And do you know why you're a
21 witness in the case?

22 A. No. I have my thoughts as to probably why, but
23 we have some Ring cameras that were used, so I assume
24 it's related to the Ring cameras.

25 Q. Okay. So that's certainly part of it for sure.

1 Do you recall when law enforcement first came
2 to your home as it relates to this case?

3 A. So I wasn't home.

4 Q. Okay.

5 A. My wife was home when they first came.

6 Q. Okay. And was -- do you recall the date, or
7 probably not?

8 A. Yeah. No. It was -- looking back, I think it
9 was March 23rd. It was a Thursday. Hold on.

10 Yeah, it was. It would have been that
11 Thursday.

12 Q. March 23rd, 2023?

13 A. That's correct.

14 Q. And you said that they first showed up at the
15 home and your wife was home but you were not at home?

16 A. That's correct.

17 Q. And did you -- did your wife contact you? How
18 did you -- what can you tell me about when they first
19 showed up, based on what your wife told you?

20 A. So I was at Fox Hollow Golf Course playing golf
21 with a couple other friends, and we had started probably
22 10:30 or so. I think it was our tee time. Typically
23 we're plus or minus around that time. So we were
24 several holes into the round, and I -- you know, not
25 carrying the phone with me when I'm taking a shot. So

1 at some point I looked at my phone, looked like I had
2 missed a call. I think it was a call, and then there
3 was a message that basically had a message for me to
4 call my wife.

5 So I called her, and she then went on to tell
6 me that detectives had showed up at the house and were
7 asking for information regarding the Ring camera
8 recordings.

9 Q. Okay.

10 A. And specifically looking to -- she has -- we
11 have iPads. We have the Ring information that comes
12 through the iPads. And she didn't have the password to
13 be able to, you know, see it or activate it or whatever.
14 I can't remember at the time. Maybe we had updated the
15 iPad, or it was her iPad. She doesn't really look, or
16 whatever the reason was, she couldn't get into it. So
17 she couldn't show them at the time.

18 So what had happened was they, I guess,
19 insisted to try to gain access by getting the password
20 or by coming to see me basically.

21 Q. Okay.

22 A. So she told them I was at Fox Hollow. And sure
23 enough, within whatever, 30 minutes or less, they came
24 onto the golf course. I don't know where we were at.
25 Maybe hole four or five. Something like that. And at

1 that time, two of the detectives came up and asked me,
2 and I was happy to try to support whatever needs they
3 had.

4 So I -- essentially, they looked at -- I
5 could -- I have the Ring on my phone as well, so I could
6 see kind of -- they had asked to see the time frame, see
7 what went on. I guess it was a couple of days prior.
8 And then eventually -- I can't exactly remember the
9 sequence, but eventually coached my wife into being able
10 to gain access, put the password in. And then at that
11 time, either the two detectives or they left one of the
12 detectives behind, went back to the house and then they
13 spent several hours with her looking at the ring camera.

14 Q. Okay. All right. The time that they met up
15 with you at the golf course, roughly, what time do you
16 think that was?

17 A. It was probably -- probably between -- between
18 noon and 1:00 p.m.

19 Q. And would they have arrived at your home maybe
20 an hour before that, or...

21 A. Well, Fox Hollow to our house is probably
22 30 minutes.

23 Q. Okay.

24 A. So I think -- I think I had the call from her,
25 roughly, around -- I'm not sure. Maybe it was around

1 noon. My guess is they may have been with her. Well,
2 I'll let you talk to her.

3 Q. Okay. That's fine. That's fine.

4 Do you know who the detectives were that showed
5 up at the house and at the golf course? Do you recall
6 their names?

7 A. My wife may recall their names if she heard
8 them. I think one was Detective Wedin. I don't know if
9 I had written down anywhere the other one. She may have
10 a card from -- Detective Gay I think was another one. I
11 can't remember. That's a female. Maybe the female.
12 I'm not sure. And then she may know the names better
13 than I do.

14 Q. Okay. All right. So it sounds to me like you
15 voluntarily gave them access to recordings. Is that a
16 fair statement?

17 A. That's a fair statement, yes. We wanted to
18 help. We didn't know who was -- we had no idea who was
19 at risk and --

20 Q. Right. Right.

21 So basically law enforcement comes, they say
22 they're looking for relevant information. They don't
23 say what it's regarding. And you assisted in every way
24 you could. Would that be a fair statement?

25 A. Pretty much, yeah.

1 Q. Okay. Do you know -- and so, did you get at
2 home that day while they were at your home?

3 A. Yes.

4 Q. All right. Tell me about what when you went to
5 your home. What time is that and what happens?

6 A. So we get -- or I got a phone -- I guess it was
7 probably -- it was probably about 4:00, 3:30 to 4:30
8 time frame maybe, you know. Something like that. And
9 then I think, you know, it's kind of getting fuzzy now.
10 It's been a long time. But it's about 3:30 to 4:30.
11 And then I went outside and was just trying to figure
12 out, just trying to understand what was going on. So I
13 went outside, and I think I spoke to one of the
14 detectives.

15 I think he -- I was just describing that
16 there -- I didn't know -- just reconfirming they had
17 what they needed, basically, from the Ring cameras, and
18 if there was anything else they wanted to see, you know.
19 Maybe I was more able to show things than what my wife's
20 capability is in that space, so -- but it seemed like
21 they had already been very thorough of going through
22 things. He seemed like they had what they needed. And
23 then -- yeah, so I don't know if that -- does that
24 answer your question, or what?

25 Q. Sure. Sure .

1 Was law enforcement in your backyard at any
2 point in time?

3 A. So, for while I was there, no. While my wife
4 was there, you might want to ask her that question.

5 Q. Okay. All right. Did -- were you curious
6 about when law enforcement shows up at the golf course?
7 Were you curious about what it was about, what the
8 investigation was about?

9 A. Absolutely. I mean -- I mean, who wouldn't be;
10 right?

11 Q. Right. Right.

12 A. I became a little bit of the target of some
13 other side comments for the rest of the round, but no,
14 in all seriousness, yeah, for sure. And it was a
15 little -- obviously, we live kind of a quiet life over
16 where we're located. And typically the only thing that
17 we would -- you know, the immediate thought might be
18 something in -- something from the park or was there
19 something or somebody's -- I don't know. But we didn't
20 really know what was -- what was the issue, you know,
21 whether it was -- so anyway.

22 Q. Did you ask?

23 A. Pardon me?

24 Q. Did you ask?

25 A. So I did ask. So the -- I'm trying to recall

1 the way the exchange went at the golf course, because he
2 asked -- I asked him does the -- what are you -- he
3 said, I'm trying to see -- I'm trying to see if a
4 certain vehicle -- or I'm not even sure if I said that.

5 I was -- I remember there's one part of it I do
6 remember where the vehicle, I think, that they were
7 looking for did not -- I said, "Well, are you looking
8 for the vehicle?" He sees it, comes back in, and I said,
9 "Well, you need to see more after that to see if it went
10 back out." And his comment was, "It doesn't go back
11 out."

12 Q. Okay. Okay.

13 A. That was at the golf course. And then at that
14 point, I thought, well, okay, I guess they got what they
15 needed and, you know, didn't lead me on to believe my
16 wife or anybody in the neighborhood was at risk, that
17 they were handling it, and therefore, I didn't plan on
18 leaving and go rushing home.

19 Q. Sure.

20 A. No sense that there was any -- anything that
21 was going on now, because he was asking to see something
22 two days prior.

23 Q. Okay. Were there additional detectives that
24 came to your home later on that day on the 23rd?

25 A. Again, I don't remember the name of the third

1 one. It was primarily the two guys at the golf course,
2 doctor -- Detective Wedin and another gentleman. I
3 forget his name. And then I think -- is Detective Gay a
4 female?

5 MR. BRUNVAND: Nathan, is Detective Gay a
6 female?

7 MR. VONDERHEIDE: Yes. Yeah.

8 THE WITNESS: I think Detective Gay was the
9 other one that we had some contact with.

10 But going back to your question, was -- so the
11 one came up into the house with me once I got home
12 when I was asking him do you need to see anything
13 more on the Ring? I can show you. No. Later I
14 went back into the house and came back out. I could
15 see that there was -- you know, nobody had left. It
16 seemed like there were somebody -- a couple more
17 people out there.

18 And so, I then was thinking while this time
19 period was going on that there -- who else has a
20 camera that would be helpful or similar to mine,
21 because I don't think too many people have cameras
22 down around the corner where I'm at. And I walked
23 up the street -- up the street -- the street being
24 Grand Central. It's probably six houses on the
25 left, and just pointed out to that person that I

1 think it was at the same time they had put a deer
2 camera or something in the tree to look across the
3 street on behalf of a guy that was building the
4 house and was having some theft at the site of the
5 house. And I just made the comment you might use
6 that. You might want to contact them.

7 BY MR. BRUNVAND:

8 Q. Okay.

9 A. And then I walked back down the street and went
10 back into the house. And then, you know, from that time
11 period on, it got busier and busier out on the front all
12 the way until -- you know, through the night, so...

13 Q. Do you recall ever having any contact with
14 Detective Bolton or Detective Hunt?

15 A. So Bolton, that name certainly rings a bell. I
16 don't know if that's the one that sat with my wife.
17 Detective Hunt, I don't know if it was Hunt or Bolton
18 maybe that could have been -- came out to the Fox
19 Hollow, but again, you can ask my wife if it was -- who
20 she was sitting with the majority of the couple hours
21 here.

22 Q. Okay. Did you ever see anyone from law
23 enforcement enter the property of Dr. Kosowski or Tom
24 Kosowski?

25 A. I did not.

1 Q. Okay. Did you see law enforcement there -- I
2 don't think I've asked you this yet, but did you see law
3 enforcement there the day prior on March 22nd?

4 A. No.

5 Q. Okay. Do you recall, were you home on
6 March 22nd, the day prior?

7 A. The only way I could know that is just take a
8 quick -- I was home. I was -- well, let me just see how
9 you want to define home, but I was in Tarpon sleeping in
10 my house. That's 20- --

11 Q. 2023.

12 A. Yeah, I know -- I know I was on at least one
13 conference call in the house in that afternoon, so yeah.
14 Yeah.

15 Q. You did not see any law enforcement presence at
16 all on the 22nd?

17 A. I did not.

18 Q. Okay. Your home, is it directly north of the
19 Dr. Kosowski's home?

20 A. No, it's to the south.

21 Q. To the south. Okay. So directly south of the
22 Kosowski's home?

23 A. Yeah, there are -- there are two of -- yeah,
24 the park is north.

25 Q. Okay. On the 23rd, did you see law enforcement

1 on the north side of -- so not on your side, but on the
2 opposite side of Dr. Kosowski's property?

3 A. On the 23rd?

4 Q. Yes.

5 A. Certainly not -- not before I had, you know,
6 left in the morning to go golfing --

7 Q. Okay.

8 A. -- and that, yeah.

9 Q. What about later in the afternoon?

10 A. I -- I did not -- I can't say that I saw
11 anybody on the property, and I assume you mean on the
12 driveway --

13 Q. Right.

14 A. -- in the back, along the fence line, and I'd
15 say no.

16 Q. Okay.

17 A. Not personally. I never saw anyone.

18 Q. Okay.

19 A. I saw there were -- there were -- there was a
20 car or cars parked at the end of the street where it
21 turns right and goes up that next short section, but not
22 walking the property.

23 Q. Other than your Ring camera, did you have any
24 other surveillance cameras at your property that might
25 show Dr. Kosowski's property?

1 A. No. No.

2 Q. Okay. All right. How would you describe your
3 relationship with Dr. Kosowski as neighbors?

4 A. Very cordial. Supportive. We, you know, never
5 had any friction, never had any reason to be
6 uncomfortable around each other. I just thought Tom
7 was -- you know, he traveled for work. We knew he kind
8 of worked at different times. He was coming and going a
9 lot; right?

10 And so that probably kept us from getting to
11 know him even better, but I would characterize the
12 relationship as often friendly, over the fence, "Hey,
13 Tom, you know, there's a bunch of debris that blew off
14 the trees from the last storm. If you don't mind, I'll
15 just go over there and clean it up, pick it up, put it
16 out on the curb."

17 You know, I've helped him, you know, with
18 the -- attempted to help him with his sprinklers one
19 time, with his water softener. Basically, I'm retired,
20 so I have a little more time on my hands, and I care
21 about the property. And we all had looked after each
22 other in the neighborhood. So I was doing the
23 neighborly thing. And Tom certainly would do the same
24 for me if I had ever needed anything.

25 And, you know, an example of that would just be

1 simply, "Tom, hey, there's some bushes around the side
2 of the house, you know, maybe your gardener next time he
3 comes he can trim that back for me." And Tom would say,
4 "Hey, Nick, I trust whatever you do. You have it if you
5 want to cut it yourself, go ahead. No big deal. Just
6 take care of things."

7 So, you know, kind of he realized or he
8 respected the fact that he traveled, he was busy, and
9 maybe didn't worry about certain things that were
10 important to a retired guy and where I'm at in my
11 life, so...

12 Q. Okay. Very good.

13 Have you had any contact with him since he was
14 arrested?

15 A. No.

16 Q. Okay. Anything else that you think is
17 important for us to know that we haven't asked you or
18 that you haven't presented to law enforcement in the
19 past?

20 A. There's quite a bit of information that's been
21 out there. So, I don't mean -- certainly I'm, as we all
22 are in the neighborhood, are concerned for -- I don't
23 know what to say. It's a very difficult situation to,
24 you know, live through for all the parties involved,
25 so...

1 Q. Right. Right.

2 MR. BRUNVAND: All right. Well, I appreciate
3 your time. And I don't know if Mr. Vonderheide has
4 any questions. Doesn't look like he does.

5 MR. VONDERHEIDE: No questions. Thank you.

6 MR. BRUNVAND: So Mr. Lucidi, if we transcribe
7 the deposition we can either have you read or waive
8 reading of it prior to it being prepared. What that
9 means is, if you want to read, the court reporter
10 will email you a copy of it before it's finalized,
11 then you can review it for accuracy. If there's
12 something you disagree with you can write it down at
13 the end.

14 It doesn't change the transcript, but at least
15 it notes your thoughts, or you can waive that and
16 you'll still get a copy of it in the event you ever
17 testify. So understanding that, do you want to read
18 or waive?

19 THE WITNESS: Yeah, I'd like to read.

20 MR. BRUNVAND: Okay.

21 (At 2:30 p.m., no further questions were
22 propounded to this witness.)
23
24
25

ERRATA SHEET

IN RE: STATE OF FLORIDA vs. TOMASZ KOSOWSKI
DEPOSITION OF: NICHOLAS 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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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 NICHOLAS LUCIDI
personally 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

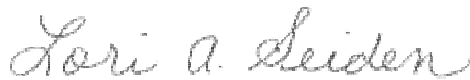
1 CERTIFICATE OF REPORTER

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 NICHOLAS LUCIDI;
9 that a review of the transcript was requested; and that
10 the foregoing transcript is a true and complete record
11 of 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

NICHOLAS LUCIDI
503 Seaview Drive
Tarpon Springs, Florida 34689

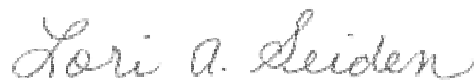
Dear Mr. Lucidi:

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