

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 Bobby Moore

DATE TAKEN: SEPTEMBER 12, 2023

TIME: 12:36 p.m. - 2:58 p.m.

Examination of the witness taken virtually before:

Tammy Kelley

Verbatim Court Reporting, Inc.  
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APPEARANCES

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I N D E X  
SEPTEMBER 12, 2023

WITNESS

Called by the Defendant:

BOBBY MOORE

DIRECT EXAMINATION BY MS. TUOMEY.....	4
DIRECT EXAMINATION BY MS. RAMOS WICKS.....	77
CROSS-EXAMINATION BY MR. VONDERHEIDE.....	92
ERRATA SHEET.....	95
CERTIFICATE OF OATH.....	96
CERTIFICATE OF REPORTER.....	97
SIGNATURE LETTER.....	96

1  
2  
3 THE COURT REPORTER: Would you raise your  
4 right hand, please. Do you swear or affirm the  
5 testimony you shall give in this cause shall be  
6 the truth, the whole truth, and nothing but the  
7 truth?

8 THE WITNESS: I do.

9 BOBBY MOORE, called as a witness by the  
10 Defendant, having been virtually duly sworn,  
11 testified as follows:

12 DIRECT EXAMINATION

13 BY MS. TUOMEY:

14 Q All right, good afternoon, sir. Can you  
15 please state your full legal name for the record.

16 A Yes. My full name is Bobby Lance Moore.

17 Q And how are you employed?

18 A As a detective the Largo Police Department.

19 Q All right. You have been listed as a witness  
20 in the State of Florida versus Tomasz Kosowski,  
21 2023-02935. This is my opportunity to ask you  
22 questions about what you know, what you don't know,  
23 what you did in this investigation. Okay?

24 A Okay.

25 Q Did you write a report in this case or

1 supplement?

2 A Yes.

3 Q And did you review that supplement or those  
4 supplements prior to your deposition here today?

5 A Yes.

6 Q Did you find any mistakes or omissions?

7 A Not that I could see, no.

8 Q All right. So you said you were with the  
9 Largo Police Department?

10 A Correct.

11 Q And how long have you been so employed?

12 A For 19 years.

13 Q Any prior law enforcement experience?

14 A No.

15 Q All right. So kind of tell me, start off how  
16 you got involved and kind of go from there.

17 A Just one second. I'm trying to adjust my  
18 settings to get better audio from you because it seems  
19 very low on my side. I don't see any other options.  
20 It's as high as it will go, so we'll go with it.

21 I apologize. Can you ask that again.

22 Q No reason to apologize. I speak low as it  
23 is. But it's loud in my mind, so, or in my head.

24 Just kind of start with how you got involved,  
25 what day you got involved, and what you did in your

1 investigation.

2 A I became involved on the date of the initial  
3 call which was March the 21st, 2023. I responded at  
4 approximately 1625 hours to the location at 1501 South  
5 Belcher Road.

6 Q All right. And when you responded, you said  
7 you responded about 4:25 you said in the afternoon?

8 A That's about the time that I believe I  
9 arrived.

10 Q And when you arrived, approximately how many  
11 other law enforcement personnel, detectives or what  
12 have you, were there?

13 A Maybe approximately six, six to eight or ten  
14 people I believe.

15 Q Six to eight to ten people?

16 A I don't have an exact count. I didn't, I  
17 didn't count everyone that was there. Sorry. But I  
18 know that there were multiple people there.

19 Q Was there a large presence of law  
20 enforcement?

21 A I wouldn't say large. Again, I would  
22 probably go with that number of, of maybe eight or so  
23 officers and detectives.

24 Q And how is it that you were called out to go  
25 to that scene?

1           A     Just asked to respond to help assist as  
2     initially we had a missing person. It was unknown  
3     where the person, which is Mr. Cozzi, might have gone  
4     to. And we had information that he had left pretty  
5     much all of his items and valuables, phone, wallet,  
6     his computer was up and running, and had left to go to  
7     the restroom and never returned.

8           Q     And when you responded to the location, who  
9     did you meet with first?

10          A     When I arrived I believe I met with, might  
11     have been Detective Bolton and Detective Hunt.

12          Q     And where were they located when you arrived?  
13     Were they inside, were they outside?

14          A     I think initially they were inside. Might  
15     have been in the -- I believe there was a marketing  
16     company that was inside the building, that they were  
17     speaking with other employees there.

18          Q     So you met with the other detectives. I'm  
19     assuming that there was some kind of conversation or  
20     communication between you guys, right?

21          A     Correct. We just had a brief meeting and  
22     they were more or less filling those of us that had  
23     just shown up on the information that they had  
24     received.

25          Q     All right. And from after that point, what

1 did you do?

2 A After that point my main task was just to  
3 try and start looking through surveillance video to  
4 see if there was anything noticeable that might assist  
5 in trying to find Mr. Cozzi.

6 Q And when you say surveillance video, can you  
7 be more specific.

8 A Yes. There's surveillance video from the  
9 Tampa Bay Veterinary business and there's exterior  
10 cameras that were pointed toward -- basically pointed  
11 westbound from the corner of the building. And that  
12 camera was facing the main entrance as one would walk  
13 into -- in order to gain entry into the Blanchard Law  
14 Firm.

15 Q All right, let's talk about the first one  
16 that you referenced, the Tampa Bay Veterinary  
17 Specialists Clinic. How did you obtain access to that  
18 video surveillance?

19 A Well, Officer Bure was already inside the --  
20 I think it was the administrative office. So she was  
21 already there and she had already began the process of  
22 looking through the surveillance video.

23 So I more or less just kind of took over  
24 for her and relieved her.

25 Q So you relieved her of reviewing the office



1 surveillance video?

2 A Correct.

3 Q Approximately -- was anybody else with you  
4 when you were reviewing this video surveillance?

5 A I don't recall. I don't recall if any other  
6 employees from the Tampa Bay Veterinary office was  
7 there or not.

8 Q And do you recall what kind of video  
9 surveillance system this was?

10 A I do not.

11 Q Do you know whether or not the timestamp on  
12 the video surveillance was accurate?

13 A The timestamp was later viewed as a, you  
14 know, a live view and it was confirmed to be true and  
15 accurate with the actual time.

16 Q Okay. Did you do that or did someone else do  
17 that?

18 A I did that.

19 Q And was that the same day or a different day?

20 A That might have been a different day. It  
21 might have been the following day. There was multiple  
22 time spent reviewing the video from the evening of the  
23 21st and then also the morning of the 22nd.

24 Q Now, you talked about video surveillance  
25 cameras that were on the outside of the buildings?

1           A     Yes.

2           Q     Did you access the video surveillance footage  
3 on the exterior of the entire building? Does that make  
4 sense?

5           A     Are you referring to different cameras,  
6 different views of different cameras that were  
7 installed on the building? Is that what you're  
8 asking?

9           Q     Yes, sir. Thank you.

10          A     From my recollection, there were -- we had  
11 limited camera angles that we could work with in large  
12 part because, if I recall correctly, I think there was  
13 one or two that might not have been working properly.

14                So the, the limited cameras that we  
15 actually did have was the main one that was used  
16 which did later show the silver truck. And that  
17 was kind of positioned over an overhang, like a  
18 soffit of the building. And, again, that was  
19 pointed facing a west direction toward the main  
20 entrance for the Blanchard Law Firm.

21          Q     And was that outside video on the same system  
22 as the video surveillance on the inside of those  
23 buildings? Of those offices I should say.

24          A     Yes. From what I recall, it was all on one  
25 system.

1           Q     Do you know how many people had access to the  
2     inside or the interior video surveillance to that  
3     building?

4           A     I do not know how many people had access to  
5     that, no.

6           Q     So, for example, the Blanchard Law Firm and  
7     then the veterinary clinic, the, the video surveillance  
8     in your testimony is all available and accessible  
9     through one system?

10          A     From my recollection, yes, it was one  
11     system, there were multiple cameras. As I could  
12     recall seeing different cameras obviously for the --  
13     that were installed.

14                 But, yes, it all appeared to be on -- they  
15     all appeared to be coming from one system. Meaning  
16     that there weren't multiple brands or types or  
17     manufacturers.

18          Q     And were these, were these videos, if you  
19     know -- let me ask you this. How is the video  
20     surveillance on the inside and the outside, or interior  
21     and exterior of that building stored?

22          A     I believe it was Cloud-based storage.  
23     Because we had to essentially request a clip of the  
24     timeframe that we needed and then that was downloaded  
25     and that's how we obtained the video.

1           Q     Okay.  So it's Cloud-based storage.  So who  
2     would have given you access to that Cloud-based  
3     storage?

4           A     I don't know if I received the name.  But it  
5     would have been, you know, one of the managers or  
6     administrators on site.

7           Q     And then the clip that you requested, how did  
8     you obtain that?  You said you -- it was downloaded,  
9     right?

10          A     Correct.

11          Q     Do you know when it was downloaded?

12          A     I believe the video clip was downloaded on  
13     the 22nd, I believe.

14          Q     Did you do that or did someone else?

15          A     I had obtained the clip, yes.

16          Q     You obtained the clip.  Okay.  So tell --  
17     walk me through how you did that.

18          A     So once we had an idea of the timeframe of  
19     completion from when we finally were able to determine  
20     the arrival of the Toyota Tundra truck and then the  
21     departure of the truck, we were able to place those  
22     times in and then request a download.

23                 And once we had that downloaded to the  
24     computer there in the office, we were able to move  
25     that onto a USB drive and in which it was uploaded

1 to our evidence.com.

2 Q Was there a certain type software that was  
3 also provided to you to open those video clips or is it  
4 something that you can view on some kind of standard  
5 player or what have you?

6 A I don't believe it had any form of Codex  
7 requiring, like, a physical, like, a separate player.  
8 I think it was just a standard clip that you could  
9 view.

10 Q Do you know how long this video surveillance  
11 keeps the footage for? If that makes sense.

12 A It does. And I was -- I'm trying to recall  
13 what I was told from the office. I want to say it  
14 might have been approximately -- I want to say it was  
15 between two weeks to a month I believe. Actually I  
16 want to say it was more of 30 days of timeframe and  
17 then it would start to kind of rewrite over itself.

18 Q All right. So in order to preserve any video  
19 surveillance of that office both inside -- or that  
20 location I should say both inside and outside, it would  
21 have had to have been done within 30 days?

22 A From my recollection, yes. And when you  
23 refer to inside, I don't really recall any  
24 surveillance being inside as far as the foyerway or  
25 the Blanchard Law Firm as far as in that specific

1 area.

2 Interior camera views, again, going off my  
3 recollection were more based as far as the vet  
4 clinic as that was a separate building.

5 Q Did you or someone else review all of the  
6 footage going back as far as you possibly could go  
7 inside and outside of that building?

8 A Again, there wasn't -- my recollection  
9 viewing the cameras, there was not any interior that  
10 would have been around the Blanchard Law Firm. So  
11 there was nothing to review as far as that goes.

12 Q Okay. But there's -- there are videos --  
13 there are cameras inside that building, correct?

14 A I can't speak to that because I didn't, I  
15 didn't see any cameras inside of that south building I  
16 guess I could say. Which is where the location of the  
17 Blanchard Law Firm was at.

18 Again, from my memory the interior cameras  
19 were mainly on the vet clinic side.

20 Q All right. How many specific clips did you  
21 request to be downloaded from this server, from this  
22 iCloud server or Cloud-based server?

23 A I believe it was the two clips. One of  
24 which is obviously on the 21st and then the second was  
25 related to a previous incident. I was trying to find

1     that date for you. I believe that would have been on  
2     March the 14th.

3           Q     Did you look for any other video surveillance  
4     that may have been captured previous to or prior to  
5     March 14th of 2023?

6           A     No, I did not. I was just reviewing the  
7     video based information that we had. So we knew that  
8     there was an incident that took place on the 14th in  
9     that morning so I reviewed, I reviewed the video at  
10    that time.

11                Again, video's kind of playing, you know,  
12    almost second by second. So I was going off the  
13    information that we had to try to get video that was  
14    needed for, for this investigation.

15           Q     Okay. So, as we sit here today, we would not  
16    have the ability to obtain any other potentially  
17    relevant video clips from either the interior or the  
18    exterior of that building because those would not be  
19    preserved?

20           A     Based on what I was told, from my review,  
21    unless the terms have changed afterwards with their  
22    Cloud services or their system, then, yes, correct, we  
23    would not be able to view anything from that system  
24    today related to in March.

25           Q     All right. So you went to the video footage.

1 What's the next thing that you did?

2 A So aside from reviewing the video, my next  
3 involvement probably would have come on March the  
4 22nd. I had received information from Detective Wedin  
5 that a PSTA, public bus cameras, had obtained images  
6 of a vehicle, same vehicle description that we had  
7 observed leaving the parking lot and I had been given  
8 that information.

9 Q And who did you get that information from?

10 A Detective Wedin, W-e-d-i-n.

11 Q You had said that. I apologize. And then  
12 what did you do?

13 A There's a lot of different things. I mean  
14 obviously I can go on.

15 Q Sure.

16 A I spoke -- I received a message from Denise  
17 Cruz --

18 Q Okay.

19 A -- who was a friend Stephen Cozzi's. She  
20 had requested to speak with me. So I called her to  
21 see if she had any information that might assist with  
22 the case.

23 She was just a personal friend, kind of  
24 just wanted to indicate that she had, had been with  
25 Stephen I believe over that weekend prior to the



1 incident. I had asked her if there was anyone that  
2 would have caused harm or caused Stephen's  
3 disappearance and to her knowledge there was no one.

4 Q Do you know how Ms. Cruz obtained your  
5 contact information?

6 A I don't know how she obtained mine. I know  
7 that I received a notification from a Detective  
8 Clement, C-l-e-m-e-n-t, of the Pinellas County  
9 Sheriff's Department. That's who I had received the  
10 information from. And then I contacted her at the  
11 phone number that was provided to me.

12 Q And when you initially -- so this is by  
13 telephone, correct?

14 A Correct. It was all, all my telephone.

15 Q Did you record your conversation with her?

16 A I did not.

17 Q Did you go interview her in person?

18 A No, I did not interview her in person. It  
19 was just by phone.

20 Q And what did she say to you?

21 A Based on my supplements that I had written  
22 of our interaction, I had questioned her about  
23 Stephen's relationship with his husband. Denise  
24 described the relationship as healthy, no indications  
25 of infidelity. Denise indicated that Stephen and his

1 husband had married in the fall of 2020, had been  
2 together for a period time before their marriage.

3 Denise did not have any knowledge or  
4 reason that would explain Stephen's disappearance  
5 during our discussion and she indicated that  
6 Stephen's phone number and provided his phone number  
7 as (804)304-3081.

8 Q I appreciate this, that you wrote a long  
9 report and I see that you're reading from your report  
10 and I appreciate that. I've read that information.

11 But other than what's been written in your  
12 report, do you recall what else she communicated with  
13 you? First and foremost, why was she contacting law  
14 enforcement? Do you know who put her in contact with  
15 you guys? Was it because of the press? I mean what  
16 was it that led her to contact you guys?

17 A I don't know other than she may have heard,  
18 you know, through third-hand account or from a  
19 possible friend. I'm not sure.

20 Q Do you know how she's related -- except being  
21 a friend to Cozzi, do you know whether or not -- what  
22 her relationship is to Michael Montgomery?

23 A No.

24 Q Do you know how long she's been friends with  
25 Cozzi?

1           A     I do not.

2           Q     Did you get an address for her?

3           A     I did not, no. I don't believe I obtained  
4 an address for her.

5           Q     Did you also recover some electronic devices  
6 that were left behind or left in Stephen Cozzi's office  
7 at Blanchard Law Office?

8           A     Yes.

9           Q     Did you seize those or did someone provide  
10 those to you or kind of, like, how did that happen?

11          A     So, again, going to my supplement. I wrote  
12 that I attempted to recover electronic devices left  
13 behind by Stephen Cozzi.

14                Based on those -- that information from  
15 the call notes and information that we had been  
16 provided during our briefing, again, was that he had  
17 left his work laptop up and running, his cell phone  
18 had been left on his desk. I think he also had a  
19 tablet that was left there as well. And all those  
20 items had remained on his, his office desk.

21                So those items I did request the PCSO  
22 forensic specialist to photograph that office and  
23 that desk area before we then proceeded to take  
24 those items and try to keep those powered on and  
25 brought them back to the Largo Police Department.

1           Q     How was Mr. Cozzi's iPhone seized? Meaning  
2     when you took it in your possession, what did you do  
3     with it other than look at it and realize that you  
4     can't -- you couldn't open it? What did you do at that  
5     point?

6           A     Well, it was placed into our cyber lab and  
7     connected to a charger. We -- again, we're trying to  
8     keep that powered on since it was already on in the  
9     event that, that Cozzi's husband or someone that might  
10    be of a close relationship to him might have a  
11    passcode that we can use to be able to get into that  
12    device.

13          Q     So when you take the device, the --  
14    specifically the iPhone from the Blanchard Law Office,  
15    how did you transport it to the cyber lab?

16          A     I physically transported it in my vehicle.

17          Q     In a bag, in your hand? What?

18          A     I believe it was in -- I believe the  
19    forensics specialist might have provided a -- one of  
20    their bags and it was placed into that.

21          Q     One of their bags. Is it a special kind of  
22    bag or just an Evidence bag or something different?

23          A     Just an Evidence bag I believe.

24          Q     Okay. So the iPhone was transported in an  
25    Evidence bag to your cyber lab?

1           A     From what I recall, yes.

2           Q     And when you say cyber lab, is this a --  
3     when -- you said I think the iPhone was kept powered  
4     on?

5           A     Right.

6           Q     Do you know whether or not your cyber lab --

7           A     Sorry, is your audio breaking up?

8           Q     No, I'm -- no.

9           A     Apologies.

10          Q     No, my apologies. I'm trying to think of how  
11     to word this. So can you describe your cyber lab for  
12     me.

13          A     So it's basically two -- you have to go  
14     through two key card access to get into our lab. It's  
15     a fairly small room. Both Detective Wedin and I work  
16     out of that room. We have our computers that we use  
17     for our investigations inside of that room.

18          Q     And the items -- your computers, cell phones,  
19     what have you, if they're in that cyber lab do they  
20     have access or are they able to access any Internet  
21     capabilities if that makes sense?

22          A     Yes.

23          Q     Yes you said? Yes.

24          A     Yes, yes, they can access the Internet.

25          Q     So it's not like a big faraday room, if you

1 will?

2 A No.

3 Q And you said the phone was plugged in and  
4 came on?

5 A Right.

6 Q All right. And is there a reason why you  
7 were not able to obtain the passcode from Mr. Cozzi's  
8 husband or someone else?

9 A From, from speaking to Detective Bolton,  
10 there was, I think, passcodes that he thought might be  
11 it. However, we were never able to get access into  
12 the device. No one had the passcode that was used.

13 Q And it appears that your agency did not have  
14 the ability to jailbreak and/or enter that iPhone. Is  
15 that also correct?

16 A So at the time that obviously this  
17 investigation was going on I do -- I don't believe  
18 that that device was currently supported by those  
19 companies that have that capability.

20 Q Do you know whether or not your agency has  
21 since attempted to do that?

22 A I know I personally have not. So I don't --  
23 I can't speak for anyone else, but I know I have not  
24 been requested to do that.

25 And, again, it all goes based upon when

1 the companies have updated to support those phone  
2 models and what operating systems they might have  
3 been running. And sometimes that can take months or  
4 years.

5 Q So the passcode, was it a four-digit passcode  
6 or a longer passcode? Or do you know?

7 A I don't recall.

8 Q In your report it looks like you conducted a  
9 search on ZetX.com?

10 A And actually if I can go back to answer your  
11 question. I did just look back in the report and it  
12 says Stephen's iPhone was secured with a six-digit  
13 passcode.

14 Q Six-digit passcode.

15 A Correct.

16 Q Thank you. So the search on the ZetX.com,  
17 how did you do that? How did you conduct the search?

18 A ZetX.com is a website that's accessible,  
19 anyone to my knowledge can access it. You can type in  
20 a phone number and it provides a -- information as far  
21 as -- if a name is provided or if it's a known name  
22 attached to that phone number, it will provide that.  
23 If it's unknown, it will just typically say the  
24 carrier name.

25 So it's more or less just trying to

1 identify what carrier is tied to that phone number.

2 Q And it looks like you searched for a specific  
3 cell phone number or a phone number?

4 A I recall doing it. I'm just trying to get  
5 caught up with which one you're referring to.

6 Can you guide me as far as what you're  
7 referring to?

8 Q Yes. It's the (321)663-0128.

9 A Yes. From memory, I believe that was  
10 Mr. Kosowski's phone. Okay, I see it here. I see it  
11 in the supplement.

12 Yes, the (321)663-0128 which was used by  
13 Tomasz Kosowski during the teleconference.

14 Q So where did you conduct that search at?

15 A The ZetX.com search?

16 Q Yeah, like physically. Were you at the  
17 Blanchard Law Firm, were you somewhere else, or?

18 A No, I probably was at my desk in the cyber  
19 lab.

20 Q So you would have conducted the search from a  
21 computer in the cyber lab?

22 A Yes.

23 Q How many other searches did you do on that  
24 specific website?

25 A I don't recall.



1           Q     What other searches on the website did you  
2     conduct in relation to this investigation?

3           A     I would have to look back through all of my  
4     supplements to see other times that I might have  
5     mentioned ZetX. I believe there might have been a  
6     search for another phone number that I think was  
7     provided by a neighbor with a belief that it was  
8     Mr. Kosowski's phone number only to -- for us to later  
9     learn that that might have been an older number.

10                So aside from searching those numbers, I  
11     might have searched the phone number for Mr. Cozzi.  
12     But I don't recall off the top of my head any  
13     others.

14           Q     Are those searches preserved, to your  
15     knowledge?

16           A     I do not know. I don't know if a screenshot  
17     was captured at that time or not. I can't answer.

18           Q     And can you conduct -- I think you had  
19     already said this. But you can conduct a search by  
20     phone or you can conduct a search by name or word?

21           A     No. ZetX.com is only a search by phone  
22     number.

23           Q     Okay. So let's jump to March 22nd. I think  
24     previously started to testify about your assisting  
25     Detective Wedin in obtaining and/or looking, reviewing

1 video surveillance in the surrounding areas I guess for  
2 a specific vehicle.

3 A On that date I had received information  
4 from Detective Wedin based on my supplement that  
5 surveillance video from the Circle-K at 1499 South  
6 Belcher Road and also showed a PSTA bus and the  
7 vehicle. And that's when we start getting information  
8 as far as the PSTA bus images of the, the Toyota  
9 Tundra.

10 Q All right. And were you heavily involved in  
11 attempting to find and/or track and locate this  
12 specific vehicle, I guess it was a Toyota Tundra on  
13 March 22nd?

14 A I think my involvement as far as trying to  
15 locate video and images came more on the 23rd. That  
16 was when my involvement was trying to get any  
17 surveillance images that appears to have taken place.

18 Q All right. Let me jump to the 511 Seaview  
19 neighborhood canvass. Were you involved in that?

20 A As far as canvass to talk with neighbors?  
21 Is that what you're referring to?

22 Q Yes.

23 A No, I was not involved with that.

24 Q So you did not participate in the 511 Seaview  
25 neighborhood canvass on March 22nd?

1           A     No. No, I wasn't part of any neighborhood  
2 canvass on the 22nd.

3           Q     Did you go to the 511 Seaview residence or  
4 address prior to March 23rd?

5           A     Not that I can recall, no.

6           Q     When did you determine that the Toyota Tundra  
7 belonged to Dr. Kosowski?

8           A     When did I determine that it belonged to  
9 him? I'm just trying to make sure that I'm  
10 understanding your exact terms. Because belong  
11 meaning registered or own. That's how I would --  
12 that's what, to my knowledge, what that belong means.

13          Q     So just because something's not registered  
14 doesn't mean you don't own it or it doesn't belong to  
15 you and just because, vice versa, something may be  
16 registered in your name doesn't necessarily mean that  
17 you own it or it belongs to you either.

18                So my question is when did you determine that  
19 the Toyota Tundra belonged to Dr. Kosowski?

20          A     I guess if we're going with those terms, it  
21 would have been on the -- I believe it would have been  
22 on the 23rd I believe. Because that would have been  
23 when Detective Compton had viewed surveillance video  
24 from 503 Seaview Drive which essentially placed the  
25 vehicle going to 511 and I believe some of the

1 detectives I think had made contact with neighbors who  
2 said that they had recently observed Mr. Kosowski, I  
3 believe, driving that vehicle.

4 Q And were you present for the search warrant  
5 that was executed on the 511 Seaview Drive residence?

6 A Yes, I was present.

7 Q And what time did you first arrive?

8 A That was a very long day. I think as that  
9 day progressed we were working as a team, as a group,  
10 working on our way northbound through different  
11 locations with surveillance video and then the  
12 progressing our way through the neighborhood  
13 eventually leading us to Seaview and I want to say  
14 that might have -- at that point in time we were --  
15 had finally placed that truck at 511 Seaview, it might  
16 have been approximately 2:00, 3:00 in the afternoon  
17 maybe.

18 So most of us were kind of just standing  
19 by at that scene and standing by in the neighborhood  
20 there until, until the search warrant was completed  
21 and signed off, which I want to say might have been  
22 approximately 8:00 or 9:00 that night.

23 Q Okay. So my question was -- I don't know if  
24 you answered it or not -- but what time did you arrive  
25 at that, that residence?

1           A     Again, we were outside in the roadway area,  
2     again that would have been probably about 2:00 or 3:00  
3     in the afternoon, and remained -- I had remained in  
4     that area that entire time.

5           Q     And during the entire time you said you were  
6     in the roadway in that area that you arrived until you  
7     left or -- I shouldn't say left -- until the time that  
8     search warrant was executed, what specifically were you  
9     doing?

10          A     Primarily just being there at the residence  
11     to see if there was any other persons that would  
12     either leave from the home or show up at the home.

13          Q     How many other law enforcement officers,  
14     deputies, what have you, were present with you at any  
15     given time during the time that you were there?

16          A     Maybe four or five others.

17          Q     Prior to an -- a search warrant being  
18     obtained for that residence, did you go on the property  
19     at all?

20          A     Not that I can recall, no. I believe I had  
21     originally parked my unmarked vehicle in the driveway.  
22     Well, not in the driveway but on that roadway kind of  
23     blocking the driveway. I know I did not walk up to  
24     the front door or the sides of the home. But I don't  
25     recall stepping onto the property I guess you could

1 say.

2 Q Was Detective Bolton there when you arrived  
3 on the property, if you recall?

4 A I don't believe he was there in the early  
5 afternoon time, at like 2:00 or 3:00. I don't believe  
6 he was there at that point in time.

7 Q So did he come later or was he there before?  
8 Or do you know?

9 A He arrived later and I met with him as he  
10 was obtaining the search warrant.

11 Q And you had indicated that you -- when you  
12 arrived you parked your vehicle in the roadway more or  
13 less blocking the driveway of that residence, the 511  
14 Seaview.

15 A Correct.

16 Q Did you at any point in time during the time  
17 that you were there move your vehicle?

18 A Yes. I mean during that time I, I had moved  
19 my vehicle. I didn't create a log of where. But,  
20 yes, I did move my vehicle.

21 Eventually I had left to go meet with  
22 Tarpon Springs Police Department, their SWAT team as  
23 they were planning to execute the search warrant.  
24 So, yes, I did leave at some point.

25 Q Prior to leaving, did you move your vehicle

1 for any other reason?

2 A I don't believe so. I can't recall  
3 completely, but I don't believe so.

4 Q Did you take any photographs of the, of the  
5 house?

6 A Not that I recall.

7 Q Did you look into the garage?

8 A No.

9 Q Did you see any other law enforcement  
10 officers, deputies, or otherwise look into or inside  
11 the garage?

12 A No.

13 Q Did you see any other law enforcement  
14 officers, deputies, or otherwise, take any photographs  
15 of the house, the front, the side, any area of that  
16 property?

17 A No.

18 Q So you indicated in your LPD report that when  
19 the garage to the 511 Seaview was open and a Toyota  
20 Tundra became visible you spotted a Florida license  
21 plate that belonged to Marc Otto on it.

22 A Yes. And then that supplement -- and there  
23 was a couple of supplements that I wrote as well.

24 Again, these supplements were generated  
25 when we finally had a chance to kind of sit down and

1 be able to type. But I had erroneously placed the  
2 tag as KXQE61 in my supplement. That should have  
3 been 70ANQU.

4 Q Okay. So that's something that's incorrect?  
5 Meaning the license plate tag number is incorrect but  
6 also that it belonged to Marc Otto when you -- when the  
7 garage door is open you see the Tundra and you see the  
8 tag that you automatically associated that tag with  
9 Marc Otto, that's incorrect or it's a different  
10 timeframe or something different?

11 A So as far as Marc Otto, that tag, KXQE61,  
12 that tag itself didn't link with Marc Otto who was the  
13 previous owner of the vehicle. I was just notating,  
14 as I had mentioned in a later supplement, that I had  
15 erred when I first put that, that tag in there as  
16 being affixed to the back of the truck when the garage  
17 door raised.

18 Q Okay. Did you run any of the license plate  
19 numbers that evening?

20 A I don't believe so. I think Detective Sinni  
21 did most of that research.

22 Q All right. So you did not run, it would have  
23 been Sinni that would have run any of the license plate  
24 numbers that were -- numbers, letters, what have you,  
25 that were found?



1           A     Correct. Or VIN.

2           Q     Did you run the VIN number on the, on the  
3 truck after the search warrant was executed?

4           A     After the search warrant was executed, I --  
5 probably pretty certain that I did run that through  
6 DAVID.

7           Q     And when you say you're pretty certain, is  
8 that notated in your report somewhere?

9           A     It's not notated in my report but from  
10 recollection.

11          Q     Recollection you recall running the VIN on  
12 that?

13          A     Yes.

14          Q     All right. Was there any prior knowledge  
15 among your agency or law enforcement for that, for that  
16 matter that Dr. Kosowski owned a Toyota Tundra prior to  
17 the 511 Seaview search warrant being executed?

18          A     No, there is no known information because  
19 the database that we would access that through, which  
20 is DAVID, did not show a Toyota Tundra as being  
21 registered by Mr. Kosowski at that time.

22          Q     Do you know what vehicles were registered to  
23 Dr. Kosowski?

24          A     I recall writing something about that. Oh,  
25 I see here in the earlier portion of that.

1           It was the 2020 Toyota Corolla. And I  
2 also had observed a vehicle trailer and a  
3 motorcycle.

4           Q     Do you know whether or not there's any BOLOs  
5 put out for the motorcycle, motorcycle?

6           A     Not that I can recall. You know, and I  
7 would, I would probably answer a follow-up question  
8 with that. Because we did not -- through the  
9 surveillance video that was obtained by other  
10 investigators, we did not see any involvement or use  
11 of the motorcycle.

12          Q     From the time that you viewed the  
13 surveillance of this -- of a Toyota Tundra leaving the  
14 South Belcher Road location until it was located,  
15 whether or not it's the same vehicle or not, a similar  
16 vehicle that was located near Kosowski's --  
17 Dr. Kosowski's residence, how much of a timespan are we  
18 talking about?

19          A     Well, you're referring to basically  
20 March the 21st at -- I believe it was last seen  
21 leaving the parking lot at approximately 11- -- I  
22 would say 11:15 approximately.

23                 So from that point in time until the time  
24 that the search warrant was executed and, you know,  
25 we viewed the truck in the garage of the home on

1 March the 23rd, that might have been 9:30, 10:00. I  
2 don't have an exact time, but it would have been  
3 9:30, 10:00 roughly that night on the 23rd. So you  
4 have that timeframe.

5 Q So we can conservatively say over 24 hours?

6 A Yes.

7 Q So you entered the -- when the search warrant  
8 was executed the 511 Seaview, you entered the  
9 residence?

10 A I did.

11 Q How long did you stay inside the residence?

12 A It was -- my supplement indicates that I  
13 entered with Detective Miller of the Tarpon Springs  
14 Police Department at approximately 0250 hours on  
15 March 24th and that it appears I left the scene at  
16 approximately 0630 on that same date, on March the  
17 24th.

18 Q So what did you do while you were inside the  
19 residence?

20 A I was paired with Detective Miller and  
21 Detective Miller was, was the primary person. Well, I  
22 can't say primary person. But the -- we were informed  
23 that Tarpon Springs Police Department officers and  
24 personnel were the only ones that could search the  
25 residence. And I more or less just stood by as he was

1 conducting his search.

2 Q Stood by doing what?

3 A Just watching him, observing him.

4 Q How many other individuals were just kind of  
5 standing by observing other law enforcement personnel  
6 inside the residence would you say?

7 A I can't give you an exact number. There  
8 might have been, there might have been two or three  
9 other persons that were paired up with other Tarpon  
10 Springs personnel which would have brought a total to  
11 maybe six, six or eight of us.

12 Q So when you say six or eight of us, is it six  
13 or eight from Largo Police Department?

14 A No, no, no. No. At that time there might  
15 have been maybe three or four Largo P.D. personnel  
16 paired with three or four Tarpon Springs personnel.

17 Q Did you go through the clothes in the closet?

18 A I did not physically search anything, no.

19 Q Did you see anyone go through the clothes in  
20 the closet?

21 A I can't answer that.

22 Q Fair enough. Did you handle any of the guns?

23 A No.

24 Q Did you see anybody handle any of the guns?

25 A Detective Miller, who I was paired with, I

1 did see him remove multiple hard plastic cases from --  
2 not sure if it was a guest bedroom or not but he had  
3 removed and unopened the cases. I observed multiple  
4 handguns inside of the case, or each case.

5           Going off of recollection, that's, that's  
6 as good as I can kind of answer on that.

7           Q     Did you handle any of the guitars?

8           A     No. Again, I didn't handle anything inside  
9 of the home.

10          Q     Did you see anyone handle any of the guitars?

11          A     Not that I can recall.

12          Q     To your memory, what differentiated the, the  
13 casings that some of the guns were in from the guitars?  
14 Like, how did you know the difference?

15          A     Well, the casings that the guns were in that  
16 I recall from being pulled out from under the bed were  
17 square shaped. So they definitely were not, you know,  
18 in a guitar-like case.

19          Q     Okay. And did you take any photographs while  
20 you were inside the residence?

21          A     No.

22          Q     Do you know what was found inside the  
23 enclosure trailer in the garage?

24          A     I can't answer that. I don't recall.

25          Q     Did you wear a body camera?

1           A     No.

2           Q     Are you guys equipped with body cameras?

3           A     We had just began receiving those. I'm not  
4     sure if we had received the training for those at that  
5     point in time or not. But, no, I did not have that on  
6     at the time, no.

7           Q     If you had a body camera, would you have  
8     turned it off during the time you were inside the  
9     residence?

10          A     No, there would have been no reason to turn  
11     it off if I had had one. No.

12          Q     What would be a reason according to your  
13     policies and procedures that you're able to turn off  
14     your body camera?

15          A     You're going to the restroom, if you're  
16     viewing personal information I believe would be. I  
17     mean as far as this goes, again, if you had one  
18     there's -- there would have been no reason to, to have  
19     turned it off. Everything was very standard and you  
20     would have kept it on while you were doing your  
21     search.

22          Q     What about muting it, what are the policies  
23     and procedures on muting the audio from the body cam?

24          A     Again, I don't use it on a day-to-day basis,  
25     so I can't speak with certainty as far as the full

1 policy. But if, if we were discussing something maybe  
2 tactically or discussing something of personal  
3 information, then it could be muted at that point in  
4 time.

5 Again, I didn't have one, so it's hard to  
6 answer your question on the body-cam related  
7 content.

8 Q Oh, I appreciate that. Was the garage door  
9 at 511 Seaview open prior to the warrant being read?

10 A No.

11 Q Do you know who opened the garage door?

12 A I can't attest who opened it. I know that  
13 the Tarpon Springs, their SWAT team made entry through  
14 the front door of the residence and I just recall  
15 seeing the garage door open after they had made entry  
16 and had searched the residence. And by search,  
17 meaning they had cleared the residence.

18 Q All right. Is there anything else you did  
19 while at the residence on that specific day the search  
20 warrant was executed investigative-wise, or?

21 A No, nothing else that I can think of. It  
22 was kind of a lot of sitting and waiting  
23 unfortunately.

24 Q So that's what I've been told. All right.  
25 So I want to skip to the -- backtrack or forward I

1     should say, to the Corolla search warrant. What were  
2     your instructions for searching the Corolla when it was  
3     pulled over at 34 Orange Street?

4           A     To help speed things up with you on that  
5     one, I was not on scene when the Corolla was stopped  
6     nor did I take part in any searches of the Corolla.

7           Q     So you weren't on scene when the Corolla was  
8     stopped. Did you ever show up to that area of that  
9     scene?

10          A     The only time I showed up to that area of  
11     the traffic stop was extremely later that night when I  
12     had obtained a search warrant for, I believe it was  
13     for, like, videos of Mr. Kosowski, DNA samples. That  
14     was the only time that I had shown up and that was to  
15     provide the copies of the warrant to Detective Bolton  
16     and Detective Hunt.

17          Q     Okay. So you weren't, you weren't -- so am I  
18     correct in stating that when you arrived on scene where  
19     the Corolla was at Dr. Kosowski was not there?

20          A     I didn't see him, so I can't answer that at  
21     that point and time.

22          Q     Did you see them searching the vehicle, the  
23     Toyota Corolla?

24          A     I don't believe -- I can't recall if the car  
25     was still there or not. I can't answer that question,



1 so.

2 Q So then you can't answer what, if anything,  
3 you saw in the trunk or inside of the vehicle either?

4 A No, information like that was provided to me  
5 by Detective Bolton and obviously we had pictures that  
6 PCSO crime scene processing had taken. So I viewed  
7 those, yes. But aside from giving you personal  
8 knowledge of me physically looking into it, I was not  
9 there to tell you that.

10 Q So then what did you do while you were at 34  
11 Orange Street?

12 A Again, it was just as I refer in a later  
13 supplement for the March 25th actions, I drafted a  
14 search warrant for DNA and personal items pertaining  
15 to Tomasz and I then brought that to Detective Hunt  
16 and Bolton at 34 West Orange Street.

17 Q So you drafted the search warrant is what  
18 you're saying?

19 A I did.

20 Q And you brought it to that location?

21 A Yes.

22 Q Who told you or who advised you what to put  
23 in that search warrant, or the affidavit and the search  
24 warrant?

25 A As far as telling me, what do you mean what

1 to put in it?

2 Q Information.

3 A Well, Detective Bolton, Detective Hunt had  
4 shared a lot of the information. But, again, I mean  
5 this is -- was an ongoing team effort.

6 So I was obtaining information as things  
7 would be learned and we were all sharing information  
8 either in briefings or as it was obtained. So  
9 multiple sources were being provided as information  
10 that was used to place into those search warrants.

11 Q At what point did you develop sufficient  
12 probable cause for a body warrant?

13 A Well, the warrant was signed by Honorable  
14 Judge Matthey on March 25th at approximately 2350  
15 hours. So it was read through and determined that we  
16 had the probable cause for that at that point in time.

17 Q At what point did you or your agency develop  
18 or feel like it could develop sufficient probable cause  
19 for a body warrant?

20 A Well, it was being drafted, you know, hours  
21 earlier. I mean, as you know as an attorney, one can  
22 draft a warrant but it's completely up to a judge to  
23 read that and make that determination of probable  
24 cause to sign on that warrant.

25 Q Right. But you have to in good faith believe

1     that you have probable cause to even submit that  
2     warrant. So my question again to you is at what point  
3     in time did you or any one of the officers within your  
4     agency develop sufficient probable cause for a body  
5     warrant?

6           A     Well, you would have to refer that to  
7     Detective Bolton. Because my job primarily was just  
8     to them as they were occupied there at the scene. I  
9     was asked to draft that warrant to assist them, which  
10    is what I did.

11          Q     What information or otherwise were you given  
12    in order to draft the search warrant?

13          A     It was basically all of the information we  
14    had worked together as a group that led to the case.  
15    I mean I don't have the search warrant in front of me  
16    per se. I'd have to refer back to all that, but that  
17    basically is a culmination of our investigation into  
18    words.

19          Q     And I understand that. But the information  
20    within the affidavit and the search warrant itself, I  
21    mean obviously you didn't commit all that information  
22    into memory. So which begs the question of what did  
23    you use in order to draft the search warrant?

24          A     Well, we had surveillance video of the  
25    truck. We had multiple surveillance -- and actually I

1 shouldn't say surveillance, video showing Mr. Kosowski  
2 pulling a large wagon from the main entrance to the --  
3 where you would access the law firm.

4 We had phone call that was made for the  
5 telephone hearing. We had information that put  
6 Mr. Kosowski's phone in the area of the Blanchard  
7 Law Firm when the, the hearing was, was held.

8 Then after the hearing was held, we were  
9 able to see what appeared to be Mr. Kosowski again  
10 outside involved with the wagon, involved with kind  
11 of looking back toward the entrance of the Blanchard  
12 Law Firm.

13 We, through a team effort, worked our way  
14 north on Belcher as we went through city by city  
15 until we reached that same truck with that same  
16 wagon with that same large item that was in the back  
17 of that truck that had left the parking lot from the  
18 law firm parking lot.

19 So we had that same vehicle, same item in  
20 the back driving northbound on Seaview. And then we  
21 had the car, Toyota Corolla, leaving from the  
22 direction of Mr. Kosowski's home.

23 We had information showing it driving down  
24 to the Miami area until it had returned on the date,  
25 where it was eventually stopped.

1           Q     I appreciate that information. What  
2 information did you use, documents or otherwise, to  
3 draft the search warrant and the affidavit to the  
4 search warrant?

5           A     I'm sorry if I'm not able to answer your  
6 question or whatever, I mean the answer that you're  
7 seeking. I mean, again, I'm using the information  
8 that we had obtained up to that point to draft that.

9                     So I'm not -- sorry if I can't answer it  
10 any more clear than what I provided.

11          Q     Did you access any -- strike that.

12                     What was the reason for the prolonged  
13 detainment of Dr. Kosowski at --

14          A     I can't answer that as I was not there,  
15 wasn't a part of that.

16          Q     So you're not aware of whether or not  
17 Dr. Kosowski asked for an attorney while he was being  
18 detained?

19          A     I was told that there was an attempt to  
20 interview him and that he did ask for an attorney. As  
21 far as the minutes and the events that happened after  
22 that, I can't answer that as I wasn't there.

23          Q     So you were told that someone attempted to  
24 interview Dr. Kosowski? Is that what you're telling  
25 me?

1           A     Yes. I believe Detective Bolton had made an  
2 attempt to interview him to get his statements.

3           Q     Do you know why he was not given access to an  
4 attorney?

5           A     I can't answer that. I was not there or I  
6 don't have any knowledge of that.

7           Q     Did you collect a wallet as part of the  
8 Corolla search warrant?

9           A     I did not. I didn't collect any items from  
10 the Corolla. I wasn't a part of that. I wasn't on  
11 scene for that search.

12          Q     Were personal items such as a wallet or  
13 otherwise a part? Meaning a part of the Corolla  
14 warrant?

15          A     I don't recall if that was obtained or not.

16          Q     Do you know whether or not a wallet was part  
17 of the body warrant that you wrote?

18          A     I would have to review back to determine if  
19 it would have covered a wallet. I think it primarily  
20 related to photographs and video of Mr. Kosowski,  
21 buccal swabs, hair, follicle samples, fingernail  
22 scrapings, fingernail swabs, fingerprints, clothing,  
23 shoes, and I see here it encompasses a wallet.

24                   So, yes, it would have been part of that  
25 as well.

1           Q     Do you know what probable cause was  
2 established that led to Dr. Kosowski being arrested?

3           A     I do not. You'd have to refer that to the  
4 lead investigator, Detective Bolton.

5           Q     Were you also working with the State  
6 Attorney's Office in drafting the body warrant?

7           A     Yes.

8           Q     Who did you work with?

9           A     Mr. Vonderheide.

10          Q     And when did you begin writing the search  
11 warrant for the body warrant?

12          A     I don't recall the exact time I began  
13 working on it.

14          Q     Do you recall whether or not you used the, I  
15 guess it's called CloudGavel?

16          A     From my recollection, the CloudGavel was not  
17 used for this warrant because that template had not  
18 yet been generated within CloudGavel which forced us  
19 to kind of go the old-fashioned way and write it out  
20 and walk it through with the judge.

21          Q     Were you present when the warrant was  
22 submitted to the judge?

23          A     Yes, I was there at the judge's house when  
24 he signed the warrant.

25          Q     That was going to be my next question as to

1     you were at the judge's house.   Okay.

2                 Do you recall the timeframe between your  
3     writing the search warrant and then submitting it or  
4     getting it to the judge being signed?   Does that -- I  
5     hope that makes sense to you.   What's the timespan  
6     between that, those two?

7                 A     Well, from my memory, warrants are never  
8     easy to get -- it's not a simple process to go  
9     through.   I think, you know, there might have been  
10    possibly a couple of edits but it might have taken the  
11    course of -- sorry.   Apologies.

12                It probably would have been a couple of  
13    hours time before that was kind of drafted, read  
14    through, Mr. Vonderheide would have read through it  
15    and contact with the Honorable Judge Matthey setting  
16    up time to come to his home and meet with him.

17                So it would have taken, it would have  
18    taken at least a couple of hours to do that.   And as  
19    I mentioned in my supplement, it appears it was  
20    signed at approximately 2350 on the night of  
21    March 25th.

22                Q     All right.   You said there was a couple edits  
23    so which begs the question are you communicating with  
24    the state attorney via email and the state attorney  
25    saying, hey, change this or this is incorrect or what



1 have you?

2 A I don't recall how we communicated back and  
3 forth. I can't answer that. I don't recall.

4 Q Do you recall what edits were done to the  
5 search warrant? And when I say search warrant, I mean  
6 the search warrant and the affidavit.

7 A Yeah, honestly I don't recall what edits or  
8 changes were made at that point in time either.

9 Q But there were edits that were made?

10 A I -- probably certain that there probably  
11 was. I don't recall how many versions or what was  
12 changed. You know, we were all going on very small  
13 amounts of sleep over the course of several days. So  
14 I -- sorry, I can't answer any better than that.

15 Q When you draft a search warrant in your  
16 agency, is it stored somewhere?

17 A No. We don't have any kind of central  
18 server or central storage that stores all search  
19 warrants written by investigator or officers.

20 Q Then what do you have?

21 A Well, essentially it's -- we have our own.  
22 I mean we -- I know I can just speak for myself. So  
23 any of the search warrants that I write and get  
24 finalized and signed copies of those are placed into  
25 evidence if they're physical copy or now we have the

1 option with CloudGavel if it's an electronic warrant  
2 that that can be get uploaded to evidence.com.

3 So it's always -- a copy's always  
4 submitted as evidence. That's how it's preserved.

5 Q So there's no way as you sit here the way  
6 that you're describing that this search warrant was  
7 drafted and executed and whatnot, there's no way to go  
8 back in time and figure out what edits were made to the  
9 search warrant.

10 A Not that I recall, no.

11 Q All right. On March 24th, I'm looking at  
12 your Largo Police department report, you wrote that you  
13 conducted a cell site request for two phone numbers  
14 belonging to Kosowski by submitting them to Pinellas  
15 County State Attorney's Office electronic  
16 investigative -- or investigation unit, excuse me.

17 And my question for you is how did you make  
18 that request?

19 A I believe that request would have been  
20 through electronic means such as filling out a cell  
21 site request form, that is a standard form that they  
22 have, and we place the phone numbers on that form such  
23 as -- and also the carrier and submit that form to the  
24 electronic crimes unit who then generates the court  
25 order or the warrant for that content.

1           Q     And to whom specifically did you make that  
2 request? Is there, is there a name or it's just a  
3 general form or request that you make or you're able to  
4 make?

5           A     It's typically just through the general  
6 electronic crimes unit.

7           Q     At the Office of the State Attorney?

8           A     Yes.

9           Q     And the request that you made for these two  
10 phone numbers, what were the requests seeking?

11          A     Cell site data. So it would have been, you  
12 know, history of the phone calls or phone logs, text  
13 messages, and like cell site data. So that would also  
14 show cell locations that the device would have been  
15 accessing depending on movement.

16          Q     And when you initiate this request, how long  
17 does it take for you to get a response?

18          A     This one I think took longer than I had  
19 hoped. But I believe it was a couple of days period.  
20 I'm trying to refer back to -- if I can see when I  
21 discussed that.

22                I know I had received some that originally  
23 only went to the 21st in which we had to submit an  
24 additional request for dates that encompassed after  
25 the 21st which I would have went to March 26th.

1           It looks like in one of my later  
2   supplements I wrote that I had received that on  
3   March the 30th.

4           Q     Of those two requests, you received both of  
5   them on March the 30th or something different? I  
6   apologize.

7           A     No. We received the first one on a  
8   different date. It looks like that first request was  
9   only for March the 14th through the 21st is what we  
10   were provided or what I was provided and that was  
11   received on March 29th it appears based on my  
12   supplement.

13          Q     Okay. Go ahead.

14          A     I was just going to say at that point in  
15   time obviously seeing the cut-off date of the 21st  
16   that's when we submitted an additional request to  
17   extend that date to the 26th.

18          Q     So you extended that request from March 21st  
19   to the 26th or something different?

20          A     Yes. We extended it, we extended an  
21   additional request to extend the information to the  
22   26th.

23          Q     All right. And what information or files  
24   were you requesting? Because obviously -- this is not  
25   real time cell site information, right?

1           A     Correct. We weren't doing a ping or we  
2 weren't doing real time tracking of the device. This  
3 was historical cell site data.

4                     So it was just showing the, again, the  
5 call logs, cell towers that the phone would have  
6 been using either when data activations are being  
7 done or calls are made.

8           Q     Do you know whether or not there was any real  
9 time cell site information that was sought on any cell  
10 phone in this investigation?

11          A     No. We -- I was the one that primarily did  
12 these requests and I did not issue or ask for any real  
13 time tracking.

14          Q     Have you ever attempted to receive in any of  
15 your investigations real time tracking of a cell phone?

16          A     So typically with a lot of these cases I  
17 have assisted in seeking -- I've assisted on cases  
18 where we have sought out that data in the past. But  
19 we -- in those events that request is typically turned  
20 over to a special unit at the Pinellas County  
21 Sheriff's Office and they're the ones that we  
22 essentially say here's a PIN register and they then  
23 use that information on their own.

24                     So we, we as an agency don't -- or I have  
25 not taken part in that, no.

1           Q     Do you know if that was done in this  
2 investigation either by your agency -- obviously you  
3 said no with regards to you but -- or your agency but  
4 or any other agency?

5           A     No. No. There was no real time tracking.  
6 For any cell phone activity that was done on this  
7 device or this incident.

8           Q     Do you know why that was not done?

9           A     No, I can't attest to that on why it was not  
10 done.

11          Q     All right. So when you received the response  
12 to your request, is it by email or how do you get the  
13 request back? Or the response, excuse me, back.

14          A     The requests are typically provided by email  
15 from the -- someone within the electronic crimes unit  
16 and those -- that data that is provided to me is  
17 then -- in this case I believe it was uploaded right  
18 away to evidence.com.

19          Q     Do you know, to your knowledge, were there  
20 any subpoenas that were submitted for this information?

21          A     To my knowledge, I don't think the subpoenas  
22 were. It was just the cell site court-ordered  
23 request.

24          Q     Did you give a specific date -- I think you  
25 already testified to this, but I want to make sure.

1 Did you give a specific date and time range regarding  
2 the data that you were looking for?

3 A Again, I would, I would probably have to try  
4 to refer back to the court order to give you an exact  
5 date. I can only attest to what I received and that  
6 was originally the 14th through the 21st and then the  
7 second set of records was the 21st through the 26th.

8 Q So then based upon your testimony, you can't  
9 give me or can you give me the last time entry on  
10 March 21st?

11 A I'm confused by when you say the last time  
12 entry.

13 Q The last time entry on the cell site data  
14 that you received from your initial request.

15 A I can't nor would I want to give you an  
16 exact time without looking at that call record, that  
17 call log record but I believe it encompassed up until,  
18 like, probably 2359 hours. It would have encompassed  
19 that entire day. Just not into the 22nd.

20 Q Did the information or data that you were  
21 provided provide location data for the telephone calls?

22 A Yes. You can see the cell tower that was  
23 used when phone calls were made.

24 Q And does the data also provide information  
25 regarding the location for text messages?

1           A     Text messages, I don't recall, that might  
2     have encompassed with the data section. It does  
3     provide information which is like a time distance of  
4     arrival. It's a separate file, separate dataset that  
5     is provided with those records. It is a -- kind of an  
6     estimate mapping of kind of the location of the device  
7     away from a cell phone, if that makes sense.

8           Q     It does. Does this dataset provide location  
9     data for other cell phone applications?

10          A     No, it does not encompass any applications.  
11     It's just the device itself from T-Mobile.

12          Q     Does this dataset provide location  
13     information of the cell phone in any other way to your  
14     knowledge?

15          A     I'm kind of confused by what you mean by any  
16     other way. Again, it's -- this dataset that I'm  
17     referring to is -- not to say it again, but it's just  
18     an estimate based on the location of the device, on  
19     how far it is from that various cell phone.

20          Q     Okay.

21          A     If that makes sense. But that's, that's the  
22     information provided by T-Mobile.

23          Q     Yes, thank you. Now, you unloaded this  
24     dataset from T-Mobile, which is the CDR, the call  
25     detail records --



1 A Yes.

2 Q -- analytics program called TRAX.

3 A TRAX, T-R-A-X.

4 Q Does TRAX modify the data that's unloaded?

5 A The only modification of the data that was  
6 uploaded was when I had requested the time conversion  
7 be changed from UTC which is what -- it's a uniform  
8 time which is what was sent from T-Mobile to Eastern  
9 Standard Time just to make it obviously easier to view  
10 and current time.

11 Q Do you know if anything -- any information  
12 is -- do you know if any information when you make that  
13 modification is lost or altered in any fashion?

14 A No, it's -- the program is essentially just  
15 taking that data from -- that dataset from those XL  
16 files provided by T-Mobile and it's essentially just  
17 plotting it for you. So you can save a whole lot of  
18 time and view it into an easy format.

19 Q Okay. So do you know whether or not when  
20 that -- whether or not when you modify, when you  
21 convert that file, that specific file into another  
22 file, whether or not the data is altered or modified in  
23 any fashion?

24 A No, I did not see it as being altered in any  
25 fashion when I, when I compared what I was seeing on

1 Google Earth Pro versus what I was seeing with the  
2 datasets that were provided by T-Mobile.

3 Q And is TRAX, is that a software program  
4 that's purchased by LPD?

5 A Yes.

6 Q And what version of it do you have?

7 A I don't know if it has a version. It's just  
8 provided by the company.

9 Q Do you know how long has your agency been  
10 using it?

11 A We have been using that program since  
12 approximately 2016 I think. I would have to obviously  
13 look back, but I know it's been a long time.

14 Q And do you know whether or not there's been  
15 any software updates based upon any bugs or what have  
16 you within that software program?

17 A I don't know of that. It is, it is  
18 basically a online platform where you can upload the  
19 CDRs and -- the call detail records and then you can  
20 download, you know, the KMZ, which is the Google Earth  
21 profiles and you can review the results as they are  
22 mapped. But it's not something to where it's a  
23 software per se that's installed on the computer.

24 Q So you mentioned KMZ and you also mentioned  
25 comparing it to Google Earth which kind of begs my

1 question.

2           You just utilized KMZ and Google Earth kind  
3 of synonymously to mean the same thing. So is KMZ  
4 something different than when you did your search to  
5 Google Earth to make sure that there was no, I guess,  
6 modification or lost information when this conversion  
7 was done?

8           A     Yes. So it's when you generate those  
9 records, again, you look when you get them, you have  
10 call logs would be its own dataset, TDOA is its own  
11 dataset. So you can map those individually, you can  
12 map them together. It's just going to populate more  
13 data points on that map.

14           But if you were just wanting to look at  
15 call logs and you generated a KMZ file sad for that,  
16 the KMZ file is the file format that Google Earth  
17 Pro uses to map that.

18           So once you request that KMZ file from the  
19 CDRs, you can view that. And then, you know, what  
20 is always suggested would be to have, you know,  
21 another screen or another box open with those call  
22 detail records in which plots of interest you're  
23 able to kind of see and compare the times and make  
24 sure that what you're seeing on that Google Earth  
25 Pro is identical to what you're seeing with those

1 records.

2 Q And the KMZ files are able to be uploaded to  
3 Google Earth? Which I think you just testified to?

4 A Yes; you can open Google Earth Pro and then,  
5 you know, file open and then open those KMZ files with  
6 that, yes.

7 Q All right. And you use the CDR file, the KMZ  
8 file, and Google Earth to track the whereabouts of a  
9 cell phone?

10 A I didn't -- there was no tracking. I don't  
11 want to construe words. There was no tracking that  
12 was done. It's more of a observing information,  
13 historical information that was provided.

14 Q Do you know whether or not the IMEI number  
15 from this data that you received from this request  
16 matched the iPhone device that was seized from the  
17 Corolla?

18 A Yes, it did.

19 Q Do you know where this specific device was on  
20 the morning of March 14th?

21 A Oh, on the morning of March the 14th?

22 Q Yes, sir.

23 A I would probably have to go back and review  
24 the records for that as far as the location on the  
25 14th.

1           And, I'm sorry, I don't know if there's  
2 something that you can trigger my mind as far as  
3 the, you know, the potential --

4           Q     I can't. I don't have that information for  
5 you.

6           A     I mean there was the incident of the truck  
7 being at the clinic on the 14th.

8           Q     My question was do you know where this  
9 specific device was the morning of March 14th of 2023?

10          A     I don't recall exactly. I can tell you that  
11 obviously the records that you get are going to work  
12 off of the device being powered on obviously having  
13 connection with cell towers.

14                So if the device is powered off, then it  
15 is not going to relay that information and you're  
16 going to see a gap within the datasets.

17          Q     Do you know where the device was on  
18 March 21st, the morning of March 21st?

19          A     Yes. The device originated in the area of  
20 Mr. Kosowski's residence in Tarpon Springs.

21          Q     Do you know how many cell phone towers are in  
22 the location of Dr. Kosowski's residence?

23          A     No, I do not.

24          Q     Do you know how many cell phone towers are  
25 located in the area of the South Belcher Blanchard Law

1 Office?

2 A I don't know how many are located in that  
3 area. I do know that the cell records that we  
4 received provided coordinates that mapped back to a  
5 few hundred feet away from Blanchard Law Firm.

6 Q So you don't know how many cell towers are  
7 located near, around the Blanchard Law Firm or South  
8 Belcher Road?

9 A I know of one and that was the other one  
10 that I was -- that mapped back from -- that was  
11 provided by T-Mobile. And I also visually saw it as I  
12 was sitting reviewing surveillance video outside the  
13 window. You could see the cell tower that is there  
14 near Granada Avenue.

15 Q So you know of one but you don't know of any  
16 others. So the answer to my question is you don't  
17 know?

18 A Correct. If that's your answer as far as  
19 how many or exactly all of them, correct.

20 Q From where was the last location datapoint  
21 provided for the device on the 21st?

22 A The, the last location for the dataset that  
23 I recall seeing on the 21st I believe would have been  
24 in the Miami area.

25 Q Were there any other times that the device

1 was in the vicinity of Blanchard Law?

2 A Yes. In reviewing the datasets there are  
3 plots on Google Earth.

4 Q Sorry, I appreciate you trying to respond to  
5 my question but I wanted to give you a specific  
6 timeframe. Between March 14th and March 21st.

7 A I know the evening of the 21st the device  
8 appeared to have been in the general vicinity of the  
9 Blanchard Law Firm as it was going southbound.

10 Q Okay. So just one other time?

11 A Based upon quick review of my supplements  
12 and reviewing those call records, it appears that it  
13 was primarily that one time.

14 I mean it was there also the morning of  
15 the 21st because when the phone call was made in the  
16 hearing it utilized that cell tower that was mapped  
17 back to near the law firm. So you had the morning  
18 time on the 21st and you also had the evening of the  
19 21st.

20 Q Do you know based upon your review of the  
21 information that you have, how long the device was at  
22 Loop Road on Monroe Station on March 23rd?

23 A It was a short timeframe. I mean it  
24 appeared to, appeared to be passing by that location.  
25 So I don't -- I can't speak for certainty for the

1 exact amount of time it was at that location.

2 Q Can you give me in minutes or seconds or  
3 anything other than it appeared to be passing by?

4 A At that point in time, I can't speak to give  
5 you any set time. There's -- based on my own personal  
6 knowledge of being down in that area and having been  
7 there during this investigation, I can tell you that  
8 cell coverage is not the best.

9 And obviously if you were to lose coverage  
10 you're not getting additional data. So it's kind of  
11 hindering what we might receive as well.

12 It's more or less of trying to use some of  
13 the, some of the known events which are the license  
14 plate readers and then comparing those with the  
15 datasets that we had to kind of show that timeframe.

16 Q Fair enough. Let me jump to the Apple  
17 preservation request that you submitted and the search  
18 warrant.

19 You submitted a preservation request to  
20 Apple. Is that right?

21 A Yes.

22 Q And the preservation request, how did you do  
23 that? Online or something different?

24 A I believe it was through their preservation  
25 request made online, yes.



1           Q     Did you obtain or do you have a copy of that  
2 Apple request, preservation request?

3           A     I'm not sure if it was attached to the  
4 report or not. I would have to refer back to it and  
5 see if it has been.

6           Q     What did this letter request Apple to do?

7           A     Essentially just requesting to preserve the  
8 contents of the iCloud, contents related to the email  
9 address both for Mr. Cozzi and for Mr. Kosowski.

10          Q     And what was the reasoning you gave to  
11 preserve this information or this data?

12          A     I think it was just because it was an  
13 ongoing investigation, you know, involving a missing  
14 person. Again, I would have to refer back to that.

15          Q     And how long did it take you to get a  
16 response?

17          A     Well, as far as the response, we had to  
18 author a search warrant to then send to Apple and we  
19 then had to wait for them to send that return.

20          Q     So when you sent your preservation letter  
21 they responded to you saying get a search warrant? Is  
22 that what you're saying?

23          A     I already knew we would have to obtain a  
24 search warrant. I wasn't seeking any content from  
25 Apple aside from doing that. It was more or less just

1 preserve the electronic data that was there to try to  
2 prevent anyone from, you know, remotely wiping or  
3 trying to get rid of or delete any content.

4 Q Did you give a specific timeframe or just a  
5 general blanket preserve all of the information or data  
6 that you have associated with this iCloud account?

7 A I can't answer honestly as far as the  
8 timeframe, not without looking.

9 Q All right. And then you submitted a search  
10 warrant for the iPhone seized from the Corolla?

11 A Yes, there was a search warrant that was  
12 submitted for the Corolla.

13 Q And that would have been submitted on March  
14 27th I believe?

15 A Yes. It appears that on March 27th 1535  
16 hours I received notification of the electronic search  
17 warrants, that they had been signed by Honorable Judge  
18 Matthey.

19 Q And what information did you seek from the  
20 iPhone with this warrant?

21 A Originally we were able to see the call  
22 logs, power events, WiFi connections I believe were  
23 also a part of that, for that content, in addition to,  
24 you know, text messages.

25 Q Did you have any information such as call

1 logs and the locations from which they were placed from  
2 this device prior to seeking and obtaining the search  
3 warrant for the iPhone?

4 A I'm sorry, what was the question as far as  
5 prior to?

6 Q Did you, did you have any information --  
7 sorry, my voice. Did you have any information such as  
8 call logs and the locations from which they were placed  
9 from this device prior to the search warrant?

10 A The only call information that we would have  
11 had prior to would have been provided by T-Mobile.  
12 That would have been the only other information that  
13 we had related to the phone.

14 Q And when you took possession of the iPhone  
15 and the TracFone on March 27th from the LPD cyber lab,  
16 were both of the devices turned on?

17 A I believe the TracFone was off. The iPhone  
18 I believe was still powered on.

19 Q Was it in airplane mode?

20 A Just referring back to my supplement.

21 I don't see here any notification of  
22 being -- if it was in airplane mode or not.

23 Q And TracFones, are they able to be placed in  
24 airplane mode? Do you know?

25 A I can't speak with certainty. There's

1 different models, different types. But typically in  
2 most circumstances cell phones can be placed in  
3 airplane mode.

4 Q So this particular TracFone, do you know  
5 whether or not it was in airplane mode when you took  
6 possession of it?

7 A According to my supplement, due to it being  
8 powered off and not knowing whenever I was obtaining  
9 the data extraction, I had removed the SIM card from  
10 the device, powered it on, and then placed it into  
11 airplane mode.

12 So then to answer your question, based on  
13 what I'm reading is, no, it was not in airplane mode  
14 previously.

15 Q All right. This specific iPhone, do you know  
16 whether or not it had a SIM card or not?

17 A It did. To my knowledge, yes, it did.

18 Q Was that SIM card removed?

19 A I did not recall removing it myself. So it  
20 does not appear that it was removed.

21 Q Was the iPhone packaged and marked as  
22 evidence when you picked it up from the cyber lab?

23 A Yes. It had already been submitted as  
24 evidence on the morning of March 27th when I came --  
25 when I arrived at work.

1           And once I went downstairs, I submitted it  
2   in to property and evidence from the cyber lab, I  
3   then immediately signed both items back out. That  
4   was done in order to keep the iPhone in the powered  
5   on state while awaiting for the search warrant to be  
6   obtained.

7           Q     And my same question for the TracFone. Was  
8   the TracFone packaged and marked as evidence as well?

9           A     Yes.

10          Q     Do you know when the iPhone and the TracFone  
11   were first packaged and marked as evidence? I think  
12   you said March 27th for the iPhone. But is that a  
13   specific date that you recall it being marked and  
14   packaged? Or do you know?

15          A     Yes. Based on my -- my recollection is  
16   Detective Wedin had transported the -- both phones,  
17   both devices. He had placed them within the cyber  
18   lab. The iPhone had been connected to a power source  
19   when they -- when the device had been previously  
20   seized on March 25th and then again as I came in on  
21   March 27th, that Monday morning, that's when I had  
22   packaged the devices and submitted them to our  
23   property and evidence.

24          Q     All right. So does that also apply, what you  
25   just testified to, for the TracFone as well?

1           A     Yes, both devices.

2           Q     Okay. So then the date would have been March  
3     27th I think you said, right?

4           A     Yes.

5           Q     I think you said that twice. All right.  
6     When were the, the iPhone and TracFone first submitted  
7     to LPD property and evidence?

8           A     Again, that would have been on March 27th,  
9     both devices, the TracFone and the iPhone.

10          Q     So essentially the two cell phones we're  
11     talking about were unmarked and powered on from March  
12     25th until March 27th in the LPD cyber lab. Is that  
13     correct?

14          A     The TracFone was, was kind of in the form of  
15     a packaging. I mean obviously it wasn't just a random  
16     unknown phone that was just there. It was known that  
17     that was the device that had been seized. It was kind  
18     of in a separate package that had the report number on  
19     it from what I recall.

20                 It was, as I mentioned earlier, powered  
21     off. The iPhone was in a, you know, separate its  
22     own packaging, but it was connected to the power  
23     source.

24          Q     Okay. So then my question, the TracFone was  
25     in a separate package. Describe for me how it was

1 packaged then.

2 A I think it was just placed in, like, one of  
3 our clear plastic bags just in order to kind of help  
4 differentiate the item, you know, as is own. It  
5 wasn't until I came in on that Monday morning that,  
6 that everything was formally packaged, evidence label  
7 was created, and then it was submitted in property and  
8 evidence.

9 Q When did you receive a response regarding the  
10 iPhone search warrant?

11 A What do you mean by response?

12 Q From iPhone. From Apple.

13 A You're referring to the iCloud?

14 Q Yes.

15 A Looking back, it looks like I received the  
16 iCloud return for Mr. Kosowski's account on April the  
17 21st.

18 Q And what information or data was provided to  
19 you by Apple?

20 A Well, in reviewing that, essentially it's a  
21 lot of the data that you as a user may have chosen to  
22 save or to back up to an iCloud. So as was viewed in  
23 this case, photos, web searches were kind of the  
24 primary things that were observed and identified.

25 Q Was any of the information that you received

1     germane to this investigation?

2           A     Yes.  There were images from what appear to  
3     be Mr. Cozzi's residence.  I think it was of his  
4     husband's vehicle.  There was, from what I'm  
5     recalling, a video.  It almost, I believe looked like  
6     it was upside when reviewing it.  It appeared to be  
7     from the parking lot where we're showing Mr. Cozzi's  
8     vehicle at the law firm based on viewing it.

9           In addition, there was Internet searches  
10    that I had observed during a preview of the iCloud  
11    return that were provided that showed web searches  
12    that were done on March the 20th for succinylcholine  
13    and dosage amounts and searches for the information  
14    related to that.

15          Q     Do you know whether the power on and power  
16    off activity was provided for the cell phone, for the  
17    iPhone?

18          A     That information would have, would have been  
19    provided as well, yes, and it was reviewed.

20          Q     What about WiFi connection activity?

21          A     Yes, that information was also provided.  
22    Which kind of helped to show additional dates that the  
23    device was connected to the Blanchard Law WiFi.

24          Q     Did you -- what, if any, information or data  
25    did you tell Apple not to provide you?



1           A     I don't recall -- I'd have to review back to  
2     the search warrant. But I don't recall anything of  
3     what not to provide.

4           Q     So you wanted everything that Apple had to  
5     provide, right?

6           A     Again, I would have to refer back to that  
7     search warrant which would then list and indicate  
8     those items. But, yeah, I mean I would have to refer  
9     back to that. Sorry, I can't really differentiate one  
10    item or another.

11          Q     So, as you sit here, you can't specifically  
12    tell me what items or what data you requested Apple not  
13    to provide you, right?

14          A     I don't recall asking them to keep anything  
15    out of their return, no.

16          Q     What was the probable cause for the iPhone  
17    Cloud search warrant?

18          A     I recall the warrant containing essentially  
19    the same information from the investigation that I had  
20    mentioned beforehand. I believe -- again, I would  
21    have to refer back. I don't want to speak without  
22    looking back to that and I don't have it on my hand or  
23    person and --

24          Q     So are you --

25          A     Pardon?

1           Q     So are you deferring to the affidavit in  
2     support of the search warrant? Is that what you're  
3     telling me?

4           A     Yes. I honestly would want to refer back to  
5     that before answering that question, yes. I  
6     apologize.

7           Q     No worries. Prior to you seeking and then  
8     obtaining a search warrant for iCloud, the iPhone for  
9     the iCloud associated with the iPhone, did you know  
10    what specific information you were looking for?

11          A     I'm not sure what the question means there.

12          Q     Well, when you sought out to obtain  
13    information from iCloud, from Apple, what information  
14    were you looking for specifically?

15          A     Well, in regards to the iCloud, it could  
16    potentially be anything that would have been stored  
17    on, on the iCloud that could have been, you know,  
18    deleted or erased from the device itself and depending  
19    on the time that the device had been backed up again  
20    to the iCloud, there could potentially be data that  
21    was on the iCloud that we weren't potentially seeing  
22    on the phone. You know, an example of that would have  
23    been the succinylcholine web searches that were  
24    identified and found.

25          Q     But am I correct in stating that but for

1 seeking all of the information from Apple, you would  
2 have been none the wiser about that specific search?

3 A Based on my preview of -- from the iPhone  
4 device itself, I do not recall seeing that immediate  
5 result as a web search as opposed to whenever we had  
6 the iCloud return. If that -- I think that might  
7 answer your question as far as --

8 Q That answers my question. As you sit here,  
9 based upon your information regarding this  
10 investigation, do you know how that search is relevant?

11 A It's relevant because that was a medication  
12 or drug that was found and photographed by forensics  
13 specialists from Mr. Kosowski's Corolla. It was a --  
14 based on my knowledge now, is it is a paralyzing,  
15 paralytic agent.

16 So seeing the searches and then, you know,  
17 the drug being found in the car, you know, there  
18 appeared to be a connection between that as far as,  
19 you know, searching the dosage effects and  
20 essentially how much I think that you can provide  
21 someone.

22 Q When did you happen upon the knowledge that  
23 this specific substance was a paralytic agent? This  
24 was information that, I'm assuming, it seems like you  
25 learned about after -- you authored the search warrant

1 after the information was provided based upon the  
2 search warrant. So when did you realize?

3 A It probably would have been around the time  
4 the, the item was located and found in the Corolla.

5 Q But you don't know?

6 A I can't speak like on this exact date and  
7 this exact time, no. But being that the item was  
8 found there in the Corolla at that time, it was a  
9 medication, a drug, that I had not had any prior  
10 knowledge of or any association with.

11 Q What day did you submit the search warrant to  
12 iCloud and when did you get a reply?

13 A I have to refer back. So it appears that I  
14 submitted the search warrant on April the 5th for the  
15 iCloud accounts and warrants for -- and Honorable  
16 Judge Helinger had authorized and signed those.

17 As far as the return, I think that was --  
18 I think I mentioned that earlier. I believe that  
19 was April the 21st. Yeah, April the 21st was  
20 whenever I received that.

21 Q Okay. So April 5th you submitted it and then  
22 you received a reply on April 2- -- I'm sorry, did you  
23 say 21st?

24 A Correct, 21st.

25 MS. TUOMEY: If you can just go on -- off

1 the record for a second.

2 (Pause in proceedings.)

3 DIRECT EXAMINATION

4 BY MS. RAMOS WICKS:

5 Q So we're just going to continue on. I wanted  
6 to ask you about, like, going back to March 22nd and  
7 your involvement with the investigation, the premises  
8 of 1501 South Belcher. Are you with me?

9 A Yes. Are you referring to March 21st?

10 Q March 22nd.

11 A Okay.

12 Q Okay.

13 A For today?

14 Q Yes. So on March 22nd you indicated in that  
15 portion of your report that you relieved Detective  
16 Allred while Pinellas County Sheriff's Office forensics  
17 was processing the scene.

18 A Correct.

19 Q Does that ring a bell?

20 Okay. Did you enter the men's bathroom, that  
21 particular restroom that was being processed at that  
22 time?

23 A No, ma'am. I never entered the men's  
24 restroom.

25 Q All right. So you didn't enter the men's

1     restroom at any point while you were on the premises on  
2     March 22nd?

3             A     No.

4             Q     Okay. So when you say that you relieved  
5     Detective Allred, what were you -- what did you do at  
6     1501 South Belcher in relieving Detective Allred?

7             A     Primarily just being a point of contact in  
8     case the forensics specialists, if they had any  
9     questions I as a detective could reach out to the  
10    other detectives or contact Detective Bolton or Hunt  
11    in case the specialists had any questions as they were  
12    processing.

13            Q     Okay. And were there any questions while  
14    Pinellas County Sheriff's Office forensics was  
15    processing the bathroom?

16            A     Not that I recall. I mean obviously they  
17    had been there for significant amount of time. So  
18    they pretty much had already known, you know, as far  
19    as what evidence was supposed to be requested or  
20    sought as they had spoken with Detective Bolton about  
21    that.

22            Q     To your knowledge, what other law enforcement  
23    personnel went inside the bathroom?

24            A     To my knowledge, none.

25            Q     All right. And while you were on scene, you

1 didn't see any other law enforcement personnel from  
2 Largo Police Department enter the bathroom?

3 A No. I mean I know that Detective Bolton had  
4 done a visual of the bathroom. You know, he had  
5 provided me information on his observations. But  
6 aside from that, I can't speak to other personnel  
7 other than obviously the forensics specialists.

8 Q All right. While the -- while you were on  
9 scene standing by while Pinellas County Sheriff's  
10 office forensics processed the crime scene, did  
11 personnel from the Pinellas County Sheriff's Office  
12 wear shoe covers while they were present in the  
13 bathroom?

14 A I can't attest to that because I don't  
15 recall being inside of the building with them at that  
16 point in time.

17 Q Okay, thank you for the clarification. So  
18 you were actually standing outside of the building  
19 standing by, you weren't actually in the building as  
20 they were processing the crime scene?

21 A Correct. I was not anywhere near the  
22 bathroom facility or the law firm while they were  
23 processing.

24 Q Okay. So then you wouldn't know if  
25 Specialist King specifically wore shoe covers as she

1 was engaging in her processing of the crime scene?

2 A I cannot testify to that, no.

3 Q Okay. Just give me one moment.

4 A Um-hum.

5 Q I want to fast forward to your involvement in  
6 the investigation that took place in Collier County.

7 A Okay.

8 Q So specifically I wanted to ask you about  
9 Monroe station. Are you familiar with that location?

10 A I am now.

11 Q All right. That's fair. So as far as Monroe  
12 station is concerned, did you search Monroe station in  
13 the area of the waste management dumpster on March 30th  
14 and March 31st?

15 A So March the 30th, that was the time that I  
16 had left Largo Police Department, drove down to that  
17 location. Sergeant Vegenski had also driven  
18 separately. We arrived there, parked our vehicles  
19 there. Again, in full honesty, not knowing what to  
20 expect or find or see.

21 So we were just more or less walking  
22 around the area trying to see if we could find  
23 anything related or pertaining to Mr. Cozzi that  
24 might help explain why it appeared Mr. Kosowski had  
25 returned to that area. Which is an extreme rural



1 area.

2 Q All right. So you were at that location then  
3 on March 30th and March 31st?

4 A Yes. March 30th would have been -- I  
5 arrived at approximately 2200 hours. I think we were  
6 there for maybe an hour, if that. And then I came  
7 back -- or we both came back and we had the, kind of  
8 the larger more coordinated briefing and search on the  
9 31st.

10 Q All right. So as you walked the property  
11 specifically on March 30th of 2023, again, you know,  
12 you said that you weren't really expecting -- like, you  
13 didn't know what to expect, you weren't really  
14 anticipating what you were going to find there. So did  
15 you and Sergeant -- I don't want to say his name wrong.

16 A Vegenski.

17 Q Vegenski. Okay. For the record, that's  
18 V-e-g-e-n-s-k-i?

19 A Correct.

20 Q Did you-all walk the area --

21 A We did.

22 Q -- generally just to get a layout of the  
23 area?

24 A It was a layout of the area. But it was  
25 also for me having looked at those, those cell data

1 points and seeing that Mr. Kosowski's device had been  
2 in the area on an evening time, it allowed me to kind  
3 of get a feeling of what the view would be like at  
4 nighttime when the sun was not present.

5 So it allowed me to get a glimpse of that  
6 and it was a very, very dark area. I don't recall  
7 there being any lighting in the area other than  
8 across the street where it appeared there was a --  
9 kind of a small village of homes.

10 But in that area itself it was very dark,  
11 very isolated.

12 Q All right. And did you-all have flashlights  
13 and were just searching the area generally for any  
14 signs of Mr. Cozzi?

15 A Yes, we had flashlights and we were just  
16 kind of walking through that area.

17 Q All right. Did you record this walk-through  
18 in any way, like with a body-worn camera or with an  
19 outside camera, like a cell phone camera?

20 A No.

21 Q All right. And so then did you return to the  
22 area, like immediately the following day on March 31st  
23 of 2023?

24 A Yes.

25 Q Okay. So what law enforcement personnel

1 searched the area around the waste management dumpster?

2 A So the -- no one -- I can't really say that  
3 there's any law enforcement personnel that searched  
4 the area around the dumpster. That personnel, from my  
5 recollection, began a larger search of the area, more  
6 of an area search down the long stretch of Loop Road.

7 And so the command bus was in the parking.  
8 Lot, but it was more just kind of a decision and  
9 maybe a hunch that Sergeant Vegenski and I had when  
10 we discussed of, of, you know, bringing out a  
11 cadaver dog and trying to do -- to see if the dog  
12 would alert on the dumpster.

13 Q All right. So there was no specific law  
14 enforcement personnel that did a search around the  
15 dumpster or in the area of the dumpster?

16 A No. The, the only personnel that would have  
17 been around the dumpster that I had any knowledge of  
18 was whenever Sergeant Vegenski and I had arrived there  
19 the night before. So there was other personnel that  
20 was directed to search the dumpster or be there.

21 Q You mentioned a cadaver dog. So you had a  
22 cadaver dog deployed to inspect the area around the  
23 dumpster and also the dumpster itself?

24 A Sergeant Vegenski had made that request,  
25 yes.

1           Q     All right. And so who was deployed with the  
2     cadaver dog?

3           A     I, I can't give you the name. I don't know  
4     the name of who was deployed as far as, you know, what  
5     officer showed up or arrived with the cadaver dog.

6           Q     All right.

7           A     I wasn't on scene at the time whenever they  
8     arrived.

9           Q     As far as the dumpster is concerned, did you  
10    find any evidence in the vicinity of the dumpster on  
11    March 30th of 2023?

12          A     I don't recall. I know it was -- I mean I  
13    didn't write anything as far as anything being found.

14          Q     And did you find any evidence or any items of  
15    interest in the vicinity of the dumpster on March 31st  
16    of 2023, the following day?

17          A     Again, I don't have any notes or any  
18    information that's listed other than being informed by  
19    Sergeant Vegenski that the cadaver dog alerted on the  
20    dumpster.

21          Q     All right. So besides the alert by the  
22    cadaver dog on the dumpster, was anything of  
23    evidentiary value found near the dumpster to your  
24    knowledge?

25          A     To my knowledge, I can't speak to that, no.

1           Q     Okay. Anything found by any personnel from  
2     Largo Police Department in the area of the dumpster to  
3     your knowledge?

4           A     No.

5           Q     You mentioned in your report -- and I'm  
6     referring specifically to your involvement on  
7     March 31st of 2023. So we're with -- you know, so  
8     you're with me -- that you spoke with Kristen Adams, a  
9     civilian investigator for the Collier County Sheriff's  
10    Office.

11          A     Correct.

12          Q     Right. So where did she get the information  
13    as far as when the waste from the dumpster at Monroe  
14    station was picked up by waste management and  
15    transported to the Collier County Landfill?

16          A     To my knowledge, I believe she had made  
17    contact with the waste management company and she's  
18    the one that spoke with them and obtained that  
19    information.

20          Q     To your knowledge, did Ms. Adams document her  
21    involvement in the investigation in a written report?

22          A     I can't speak to that. I haven't seen a  
23    report from her. So I'm not sure if she did or she  
24    did not.

25          Q     Your report documenting your involvement on

1 March 31st of 2023 also indicates that Detective Bolton  
2 was able to obtain video footage from a camera that was  
3 mounted on the dump truck.

4 A Yes.

5 Q Did you have the opportunity to review the  
6 footage that was obtained from the dump truck?

7 A Yes, I was with him.

8 Q At some point -- or strike that.

9 At any point were you present while a  
10 civilian witness, George Villanti, reviewed video from  
11 this particular dumpster?

12 A No, I wasn't present when, when George  
13 viewed any video of the dump truck. I don't have any  
14 knowledge that he did view it.

15 Q So you don't even -- as you sit here today,  
16 you have no knowledge that he reviewed this video?

17 A I don't recall him reviewing it. I recall  
18 the information that he as a driver provided to  
19 Detective Wedin.

20 Q All right. And, to your knowledge, who  
21 reviewed the video that was obtained from the dumpster?  
22 You mentioned Detective Bolton, you had the opportunity  
23 to review it. Who else from Largo P.D. reviewed it?

24 A I can't attest to who else or who all  
25 reviewed it. Yeah, I don't know. I don't want to

1 throw names out that may or may not have reviewed it.

2 Q And as it pertains to the pick-up schedule of  
3 this particular dump truck, to your knowledge, where  
4 did Detective Bolton obtain that information?

5 A I don't know the name of the personnel. But  
6 while we were at the office when he was obtaining the  
7 video, from my recollection they were able to provide  
8 pick-up dates.

9 Q You also mentioned in your report that you  
10 returned to Monroe station with Detective Bolton and  
11 observed Collier County Sheriff's Officer forensics  
12 specialists processing the green dumpster at that  
13 location?

14 A Correct.

15 Q So, like, did you witness the processing of  
16 the actual dumpster take place?

17 A I did observe their forensics specialists as  
18 they were processing the dumpster.

19 Q So were you there for the entire duration of  
20 the processing of the dumpster?

21 A Not the entire duration. I showed up closer  
22 toward the -- I guess the middle or end, but it wasn't  
23 the entire.

24 Q Were there any other areas in addition to the  
25 green dumpster that were processed by Collier County

1 Sheriff's Office forensic specialists while you were  
2 present?

3 A Not that I recall.

4 Q So in continuing your involvement in the  
5 investigation, you indicated that on April 1st of 2023  
6 you respond to the Collier County Landfill where you  
7 took part in the search with the Largo Police  
8 Department and the Collier County Sheriff's Office. Do  
9 you remember that?

10 A Yes, ma'am, very much.

11 Q Okay. Can you walk me through the process  
12 that was involved in conducting that search at that  
13 particular location, which in this case is the Collier  
14 County Landfill.

15 A So the process that was involved was  
16 Sergeant Vegenski had made contact with the -- I guess  
17 you can probably call them the coordinator of the  
18 landfill. As I recall the conversations that I was  
19 overhearing, he essentially is responsible for every  
20 square inch of that landfill. They try to get the  
21 most waste into that one specific area as possible.

22 So he was able to attest to an approximate  
23 area based upon the date that we were able to give  
24 him as far as being on that Thursday, which I  
25 believe was the 25th, the pick-up time. It's just



1     unfortunate that we were, you know, almost a week  
2     behind.

3                 So he told us from the get-go that it  
4     would be a very difficult process being that we were  
5     so far, so many days removed and so many other  
6     trucks had been in that area.

7                 But he, he knew an approximate location  
8     and he was -- said we could try and, you know,  
9     we're, I want to say, like maybe 16 feet high, you  
10    know, in waste.

11                And, but it was a very slow process where  
12    multiple officers, investigators were there and  
13    essentially just trying to closely look and see if  
14    there were any items that might be representative of  
15    a body as they were trying to kind of carefully  
16    remove items from the top and go layer by layer.

17            Q     Did you, yourself, participate in a search of  
18    a specific area of the landfill or multiple areas of  
19    the landfill?

20            A     It would have been to that area that we were  
21    designated.

22            Q     All right. And you said, you know, an  
23    approximate area or location I believe is what you  
24    said.

25                Where did, where did that information come

1 from as far as the approximate location that y'all  
2 would be searching and the area where you-all believed  
3 there may be evidence related to Mr. Cozzi's  
4 disappearance?

5 A Again, I don't have the -- from what I see,  
6 I don't have his name listed here within my  
7 supplement, but it would have been that coordinator.  
8 And I could probably definitely assure you that  
9 Sergeant Vegenski has that information and would have  
10 documented that since he was the one that essentially  
11 organized the search.

12 Q All right. And moving to your, your  
13 affidavit that you filed in preparation for the Arthur  
14 hearing that was held in this case. Do you recall  
15 that?

16 A I do.

17 Q Okay. In your affidavit you didn't mention a  
18 cell site subpoena but only that you submitted search  
19 warrants, and this is a quote, "Submitted search  
20 warrants for the location information of Defendant  
21 Kosowski's cellular phone utilizing number  
22 (321)663-0128." That's a direct quote from the  
23 affidavit that filed.

24 Is the location information used to track  
25 Kosowski's phone, Dr. Kosowski's phone, solely, solely

1 the information that was contained in the warrants?

2 A Trying to understand your questioning. I  
3 mean there was no tracking that was done. When I  
4 think of tracking, I think of live real time tracking.  
5 There was no tracking that was, that was done in this  
6 case using the electronic data from T-Mobile.

7 When I refer to -- and this is kind of how  
8 I always refer to the cell site locations, which are  
9 obtained through court-ordered search warrants, it  
10 is essentially exculpatory evidence. So it assists  
11 us in proving or disproving device -- the location  
12 of a device at the time of an incident such as this,  
13 which would have been the 21st, and showing  
14 locations and -- that had took place.

15 Q Okay, thank you. One moment.

16 A Yes.

17 MS. RAMOS WICKS: All right, I don't have  
18 any further questions. I'd like to check in  
19 with Ms. Tuomey if she's here to see if she has  
20 any follow-up questions.

21 MS. TUOMEY: Thank you, Ms. Ramos.

22 I don't have any follow-up questions for  
23 you. I don't know if the prosecutor has any  
24 questions for you. Then you are going to have  
25 to decide whether you want to read or waive.

CROSS-EXAMINATION

BY MR. VONDERHEIDE:

Q Yeah, I got just -- Detective Moore, all those affidavits that you authored, they speak for themselves, right?

A Correct. Yes, sir.

Q You swore to them and then where you learned the information would have been sourced in those affidavits, right? You would say your affiant learned from whatever the source was?

A Yes. And, from my recollection, they all indicate where it was learned from.

MR. VONDERHEIDE: Okay. And then I don't have any further questions.

But, Detective Moore, would -- read or waive? Do you have a preference?

THE WITNESS: Read.

(The deposition was concluded at 2:58 p.m.)

## ERRATA SHEET

DO NOT WRITE ON TRANSCRIPT -- ENTER CHANGES HERE

IN RE: STATE OF FLORIDA VERSUS TOMASZ KOSOWSKI  
DATE TAKEN: SEPTEMBER 12, 2023  
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.

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BOBBY MOORE

CERTIFICATE OF OATH

STATE OF FLORIDA )

COUNTY OF POLK )

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

WITNESS my hand and official seal this 3rd  
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 BOBBY MOORE, 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 3rd day of January 2025.

TAMMY KELLEY

1  
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3  
4  
5  
6 January 3, 2025  
7

8 Mr. Bobby Moore  
bmoore@largo.com  
9

10 Dear Mr. Moore:

11 Your deposition taken in State of Florida versus Tomasz  
12 Kosowski on September 12, 2023, has been transcribed. Per  
13 your request to review the transcript, it is being held at  
our office at 728 South New York Avenue, Lakeland, Florida.

14 Please call (863)500-3603 to make arrangements to do  
15 this during our regular business hours of 8:30 a.m. to 5:00  
p.m.

16 Thank you for your prompt attention to this matter.

17 Sincerely,  
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