

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 JENNIFER MORDENGA

DATE TAKEN: SEPTEMBER 13, 2023

TIME: 2:00 p.m. - 2:14 p.m.

Examination of the witness taken virtually before:

Tammy Kelley

Verbatim Court Reporting, Inc.
728 S. New York Avenue, Lakeland, FL 33815 863-500-3603

APPEARANCES

Counsel for the Plaintiff:

NATHAN VONDERHEIDE, Esquire
ALEXANDRA SPADARO, Esquire
Office of State Attorney
Post Office Box 17500
Clearwater, Florida 33762-0500

Counsel for the Defendant:

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

I N D E X

SEPTEMBER 13, 2023

WITNESS

Called by the Defendant:

JENNIFER MORDENGA

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CERTIFICATE OF REPORTER..... 16

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

6 THE WITNESS: Yes.

7 JENNIFER MORDENGA, called as a witness by
8 the Defendant, having been virtually duly
9 sworn, testified as follows:

10 DIRECT EXAMINATION

11 BY MS. SELLERS:

12 Q Good afternoon, Ms. Mordenga. Can you please
13 state your full name for the record.

14 A Jennifer Mordenga.

15 Q And, Ms. Mordenga, what's your date of birth?

16 A January 5th, 1977.

17 Q Do you go by any other names other than
18 Jennifer? Any nicknames?

19 A Jenn.

20 Q Okay. Do you live in Pinellas County?

21 A Yes. Oh, my God. I just moved here. I had
22 to think about that, sorry.

23 Q The county, I threw you off. That's all
24 right.

25 Have you ever given a deposition before?

1 A No.

2 Q Okay. So I'm just gonna go through some
3 general questions with you at first. And your only job
4 is to tell the truth. If you don't know the answer,
5 just say I don't know. If you need me to rephrase a
6 question, Ms. Sellers, please rephrase the question.

7 Instead of going through your entire living
8 history, have you ever been convicted of a crime or
9 been arrested, had to appear in court for a criminal
10 case?

11 A No.

12 Q And did you have the opportunity to speak
13 with the state attorney before this deposition and go
14 over any statements that were provided early on to law
15 enforcement?

16 A No.

17 Q Okay. You know why you're here, right?

18 A No.

19 Q Okay. So there is a missing person, Stephen
20 Cozzi, and I represent Dr. Kosowski who's charged with
21 first-degree murder.

22 So I am just gonna ask you some questions
23 about what you saw, heard, and know and then I'm gonna
24 let you go.

25 A Okay.

1 Q Okay? It looks like Detective Hunt spoke
2 with you. I got to double-check this.

3 MS. SELLERS: I'm getting a lot of feedback.
4 Is anyone else hearing that?

5 MR. VONDERHEIDE: I can hear it too.

6 A Is it on my end?

7 Q It might be.

8 A I can mute until I'm ready to speak.

9 Q That's better. Whatever you just did, I'm
10 not hearing it anymore.

11 Okay. On March 21st -- well, where do you
12 work?

13 A I work at Tampa Bay Veterinary Specialists.
14 I work in the admin building.

15 Q Okay. Are you the hospital administrator?

16 A I am.

17 Q And how long have you been in that position?

18 A I accepted the position March 20th.

19 Q Okay. And so was March 20th your first day
20 or was March 21st your first day?

21 A March 20th was my first full-time day. I
22 had worked here intermitantly up until that point.
23 That was my first full-time day.

24 Q Okay. Do you remember what time you arrived
25 at the office on March 21st?

1 A Approximately 7:30 a.m.

2 Q And how did you enter your office?

3 A I entered through a door that is -- directly
4 enters into our suite in Building B.

5 Q Is that the only door that -- is that the
6 only private door that you can get into other than you
7 can -- I know you can go into the atrium. But is that
8 the only private door to your office?

9 A Yes.

10 Q Did you -- were you the first person there?

11 A No.

12 Q Did you have a key at that time?

13 A Yes.

14 Q Do you recall if the door was locked or
15 unlocked?

16 A I do not recall.

17 Q Is it -- would it be unusual for the door to
18 be unlocked at that time?

19 A Yes. We keep the door locked almost always.

20 Q Almost always. When you entered, did you
21 then lock the door behind you?

22 A Yes.

23 Q At some point you noticed a smell of bleach.
24 When was that?

25 A I do not recall the exact time.

1 Q Do you, do you know -- and I'm not gonna try
2 to pin you down. But generally do you remember if you
3 had been there for a little bit or was it right when
4 you got there, was it closer to when you were going
5 home?

6 A It was in the morning, but the exact time I
7 do not know. It was, it was in the morning hours.

8 Q Okay. And do you know where the bleach smell
9 was coming from?

10 A No.

11 Q Do you recall the general area where you
12 could smell the bleach?

13 A It was in the common area. That would have
14 been the area -- the atrium and the restroom area.

15 Q Are you married?

16 A Yes.

17 Q And what is your husband's name?

18 A Samuel Mordenga.

19 Q Does he work in the office as well?

20 A On occasion he is our handyman.

21 Q Did -- at what point did you come into
22 contact with Todd Tensley?

23 A I do not recall the specific time that
24 morning.

25 Q Did -- let me just ask you this. After

1 you're smelling the bleach, did you go back to work?

2 A Yes.

3 Q And what were you doing at work? And tell me
4 how the day unfolded.

5 A To be honest, I can't specifically remember
6 everything from that day. Typically I spend a lot of
7 time, computer work, in my office.

8 Q Okay. At some point do you recall the police
9 showing up at the office?

10 A Yes.

11 Q Prior to the police showing up, did you see
12 any individuals that were suspicious or that you did
13 not recognize in or around your office?

14 A I did not, no.

15 Q Did the police come to your office and talk
16 to you in your office that day?

17 A I, I had interactions with them in my
18 office, yes. I had interactions with them in other
19 locations throughout the day as well.

20 Q What other locations?

21 A The admin office next to mine as well as
22 the -- I mean mostly the common areas, the hallway and
23 the atrium area.

24 Q Did you ever enter the male's bathroom?

25 A I did not.

1 Q Did you ever see the inside of the male
2 restroom?

3 A Yes.

4 Q And how did that happen? Tell me about that.

5 A I am actually trying to recall. Give me
6 just a moment.

7 Q Take your time.

8 A I'm gonna --

9 Q Do you remember if you went in there with
10 someone?

11 A I did not enter the bathroom at any point.
12 The door had been propped open at some point and that
13 is how I saw the inside. But I did not enter that
14 room at all that day.

15 Q Okay. So what did you notice about the
16 bathroom when you were able to see in?

17 A I think the biggest thing that I noticed was
18 the discoloration on the wall beside the toilet.

19 Q So from the entryway to the bathroom, you
20 were able to see the toilet or the urinal, or both?

21 A To be honest, I don't even know if there's a
22 urinal in there. So that I do not recall. If you
23 stick your -- there is a stall door and if the stall
24 door is open, I did not enter, you can see it from
25 sticking your head inside the doorway.

1 Q Okay. Are you aware of whether your husband
2 Sam entered into the bathroom?

3 A Yes.

4 Q Do you know -- tell me about that. What do
5 you know about that?

6 A I know he entered and left the bathroom and
7 that is from him telling me that. But that is all I
8 know.

9 Q Do you know if he entered the bathroom with
10 someone?

11 A He was by himself.

12 Q Do you know if this was before the bleach
13 smell or after the bleach smell? Was he going into the
14 restroom to use the restroom or was he going to look to
15 see what was going on?

16 A He went into the restroom to use the
17 restroom.

18 Q Okay. Did he mention to you that the
19 restroom was out of order or smelled a certain way?

20 A Yes.

21 Q Did he tell you this that day or since then?

22 A That day.

23 Q Do you recall about what time it was when he
24 told you that?

25 A I do not know the exact time of that

1 conversation.

2 Q Okay. On March 21st, I know that you didn't
3 see anyone out of the ordinary or suspicious, but have
4 you in the intermittent times prior to being full time
5 seen any suspicious people in or around the building?

6 A No.

7 Q Do you ever see homeless people in the area
8 loitering around?

9 A I personally have not seen any homeless
10 people on our property.

11 Q Have you heard about the homeless population
12 and possible drug use on the property?

13 A Homeless population, yes. Drug use, no.

14 Q Is it common to have pets in crates or wagons
15 transported around the property?

16 A No.

17 Q So when someone brings a cat in, for
18 instance, that -- it wouldn't be common for them to
19 bring the cat in in a crate?

20 A In a pet carrier, yes.

21 Q Okay. Let me just look over my notes. I
22 think I'm almost done.

23 Not to hammer down the point, but let's go
24 back to the time that you arrived at work, 7:30. When
25 you arrived at 7:30, did you smell the bleach at that

1 point?

2 A I do not recall smelling bleach at that
3 point.

4 MS. SELLERS: Okay, I believe that is all I
5 have.

6 State.

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

8 THE WITNESS: Okay.

9 MS. SELLERS: Ms. Mordenga, you can choose to
10 read your deposition once it's transcribed and
11 review it before it becomes a part of the record
12 or you can waive your right to read it and it will
13 just become a part of the record.

14 What would you prefer?

15 THE WITNESS: I prefer to read it, please.

16 (The deposition was concluded at 2:14
17 p.m.)

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ERRATA SHEET

DO NOT WRITE ON TRANSCRIPT -- ENTER CHANGES HERE

IN RE: STATE OF FLORIDA VERSUS TOMASZ KOSOWSKI

DATE TAKEN: SEPTEMBER 13, 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.

JENNIFER MORDENGA

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF POLK)

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

WITNESS my hand and official seal this 12th
day of December 2024.

TAMMY KELLEY
NOTARY PUBLIC - STATE OF FLORIDA
MY COMMISSION NO. HH 216644
EXPIRES: 02/07/26



1 REPORTER'S DEPOSITION CERTIFICATE

2
3 STATE OF FLORIDA)4 COUNTY OF POLK)
5

6 I, TAMMY KELLEY, certify that I was authorized to
7 and did stenographically report the virtual deposition of
8 JENNIFER MORDENGA, that a view of the transcript was
9 requested and that the transcript is a true and complete
10 record of my stenographic notes.

11 I further certify that I am not a relative,
12 employee, attorney or counsel of any of the parties,
13 nor am I a relative or employee of any of the
14 parties, nor am I a relative of any of the parties'
15 attorney or counsel connected with the action, nor
16 am I financially interested in the action.

17 DATED this 12th day of December 2024.

18
19 

20
21 TAMMY KELLEY
22
23
24
25

December 12, 2024

Ms. Jennifer Mordenga
jenrastle@gmail.com

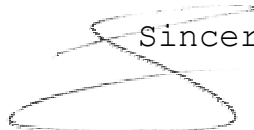
Dear Ms. Mordenga:

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

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

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Tammy Kelley', written over the word 'Sincerely,'.

Tammy Kelley