

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 RICHARD OWENS

DATE TAKEN: SEPTEMBER 11, 2023

TIME: 3:31 p.m. - 4:10 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

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I N D E X

SEPTEMBER 11, 2023

WITNESS

Called by the Defendant:

RICHARD OWENS

DIRECT EXAMINATION BY MS. RAMOS WICKS..... 4

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CERTIFICATE OF REPORTER..... 42

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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, I do.

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

10 DIRECT EXAMINATION

11 BY MS. RAMOS WICKS:

12 Q Good afternoon, Detective Owens. How are
13 you doing today?

14 A Good. How are you?

15 Q Good. My name is Willengy Ramos Wicks. I
16 am the associate attorney at Brunvand Wise P.A.
17 Myself along with my partner, Bjorn Brunvand, we
18 represent Dr. Tomasz Kosowski in this case.

19 Along with myself, there's other attorneys
20 involved. One of them is actually present here
21 today on this virtual forum. Her name is Debra
22 Tuomey. She's one of the lead attorneys on the
23 case.

24 Along with us on the defense side, there's
25 also the state attorneys. The lead state attorney,

1 Nathan Vonderheide, is here present with us today as
2 well as his cocounsel, Alexandra Spadaro, okay. So
3 those are all the attorneys.

4 A Okay.

5 Q And in addition to the attorneys, the
6 court reporter that you just spoke with a moment
7 ago, Tammy Kelley, is here to take down everything
8 that's being said during this deposition. Okay?

9 A Great.

10 Q So that's everybody.

11 So we're going to go ahead and get
12 started. If you'd like to please state your name
13 and spell your last name for the record, we can jump
14 right into the questioning.

15 A All right. My name is Richard Owens,
16 O-w-e-n-s.

17 Q Thank you, Detective Owens. Where do you
18 work?

19 A The Largo Police Department.

20 Q How long have you worked there?

21 A Twenty-five years.

22 Q All right. And during the 25-year tenure
23 that you had with Largo Police Department, what
24 positions have you held?

25 A Variety. Narcotics, street crimes, field

1 training, evidence technician.

2 Q Did you have any prior experience before
3 Largo Police Department in law enforcement?

4 A No.

5 Q All right. Did you write a report or,
6 like, a series of supplements connected to this
7 case?

8 A I did, a series.

9 Q All right. And have you had a chance to
10 review those supplements prior to this deposition
11 this afternoon?

12 A Yes, I have.

13 Q All right. Are there any additions or
14 corrections that you need to make to those
15 supplements?

16 A No.

17 Q And are those supplements full and
18 complete as we sit here today?

19 A Yes, they are.

20 Q All right. So tell me, how did you become
21 involved in this case?

22 A I was notified when I arrived at work that
23 detectives were on scene of a missing person case.

24 Q Okay. When you say on scene, where were
25 they on scene?

1 A They were on Belcher Road at 1501 South
2 Belcher Road.

3 Q All right. Did you respond to 1501 South
4 Belcher?

5 A I did. I was requested to go down there
6 and just stand by in case anything was needed.

7 Q All right. And so once you arrived on
8 scene, what did you do as far as assisting, you
9 know, or standing by?

10 A I was there for a while. PCSO forensics
11 was processing the scene. So I didn't go inside
12 until they were about completed and ready to be done
13 with their investigation.

14 And there was a set of keys that
15 Mr. Blanchard from the office had. I guess he had
16 provided them in case they needed to use anything
17 either for the office I think or I believe it was
18 for a vehicle, a set of vehicle keys.

19 So I was just requested to hand back the
20 keys and stand by with Blanchard if needed.

21 Q Okay. In your report you noted that this
22 took place on March 26th, 2023. Is that accurate?

23 A Yes.

24 Q Okay. So you didn't have any involvement
25 in the investigation, like the initiation of the

1 investigation or anything that occurred on March
2 21st of 2023?

3 A No, I did not.

4 Q All right. So you're just stepping in
5 right now the next day on March 22nd, 2023?

6 A Yes.

7 Q All right. So what personnel from Largo
8 Police Department were at the scene at 1501 South
9 Belcher when you arrived?

10 A I know Detective Bolton was there.
11 Because he was the primary on the case. There may
12 have been a few others but they -- basically they
13 were coming and going. They had different tasks
14 they were doing.

15 So I was just standing by by the building
16 outside basically scene security while they were
17 finishing, PCSO was finishing up their duties.

18 Q All right. In your duties as scene
19 security, were you maintaining a crime scene log?

20 A I did not. There was an officer
21 maintaining one at the door. I was just outside in
22 case they needed anything.

23 Q All right. And did you speak with anyone
24 at the scene, like any witnesses, any employees or
25 anything?

1 A Just Mr. Blanchard.

2 Q Okay. So your report indicates that you
3 met with Mr. Blanchard and like you indicated, you
4 know, to return the set of keys. Did you have the
5 occasion to step inside the law office, Blanchard
6 Law, that was located in 1501 6B South Belcher Road?

7 A I did. Once they released the scene, I
8 entered there to give him the keys back.

9 Q All right. And when you were there, like,
10 did you engage in any conversation with
11 Mr. Blanchard as it relates to the criminal case and
12 the investigation?

13 A Yeah, just generalities of him discussing
14 how upset he was that his business partner was
15 missing. But nothing specific to the case itself.

16 Q Did you do anything as far as collecting
17 any evidence while you were at Blanchard Law?

18 A That day I took photos. So there were
19 some -- the desk area. I didn't know if they had
20 already taken photos. I mean I wasn't privy to
21 whatever PCSO was taking photos of.

22 So I took photos of -- there was a legal
23 notepad at the desk, Cozzi's desk. And then I took
24 a series of them, there wasn't that many photos, but
25 there were sticky notes on the desk, kind of like

1 his to-do notes for the day, and then there was a
2 legal notice of some of the things he was going to
3 do. Which was have a meeting with Mr. Kosowski that
4 day. So I just took quick photos of those that were
5 on his desk.

6 Q All right. And did you take any photos of
7 any other areas whether it be Blanchard Law or any
8 other areas within 6- -- 1501 6B South Belcher?

9 A Just that office.

10 Q Just that office.

11 A Yeah.

12 Q When you say that office, you're talking
13 about Steven Cozzi's office?

14 A Correct.

15 Q All right. So once you took the photos,
16 what was the next step that you did as far as
17 assisting with this investigation?

18 A Well, the scene was released. So I gave
19 him the keys back and then everybody had started --
20 because they had a particular vehicle description
21 from I believe the cameras that were there that day
22 and a previous witness that mentioned a vehicle.
23 They started canvassing the area looking for cameras
24 that might have captured anything outside of the
25 scene.

1 Q All right. And in your report you noted
2 that a search of the surrounding streets near the
3 Flock, that's F-l-o-c-k, camera --

4 A Yes.

5 Q -- provided negative results. So, like,
6 elaborate on that for me. So, like, you get this
7 information about this truck from the Flock camera
8 or from other detectives that were involved in the
9 investigation as far as specifics about the truck?

10 A Yeah; the truck itself, the Flock camera
11 was Detective Gay. She observed a Flock hit and
12 found it. So she just relayed that information.

13 That had been after a period of time of
14 basically traveling and looking for cameras along
15 the way that might have traveled away from the area.

16 So that led to Klosterman, which is where
17 the camera was located, and it was only a cursory
18 drive up and down streets looking to see if we saw a
19 truck that matched that description.

20 Q So you participated in the search, is that
21 fair to say, as far as driving up and down
22 surrounding streets?

23 A Just, yeah, within, I mean a small block
24 range of that area. Because determination needed to
25 be made how far we were going to go that day to keep

1 looking for the vehicle.

2 Q So how far did you go that way? Can you
3 give me --

4 A I would say maybe a five-block radius.

5 Q Okay. So --

6 A Away from the camera itself.

7 Q So you and other Largo Police Department,
8 like detectives and personnel, are driving within a
9 five-block radius from where this Flock camera is on
10 Klosterman?

11 A I don't know if everybody else was, but
12 that's what I did.

13 Q Okay, that's what you did.

14 A Yeah. Yeah, just randomly looking up and
15 down streets to see if somebody happened to have
16 that vehicle and parked in their driveway.

17 Q To your knowledge, did other Largo Police
18 Department personnel participate in the search?

19 A I do not know. I did meet them there at a
20 location near the Flock camera and then it was just
21 a regrouping to see where they would go from there.

22 Q What specific areas were searched?

23 A I don't know the street names. I know
24 where the camera was located at that corner,
25 Klosterman. So anything probably north of that,

1 five blocks north of that. Maybe west and north.

2 Q And you don't know who specifically
3 searched what area?

4 A I do not, no.

5 Q So did anyone, to your knowledge, go to
6 511 Seaview Drive that day?

7 A I don't know that day.

8 Q All right. Did you go to 511 Seaview
9 Drive that day?

10 A Not that day.

11 Q So once you engaged in the search of the
12 streets surrounding that Flock camera that Detective
13 Gay got some footage from, what did you do as far as
14 your involvement in the investigation on March 22nd,
15 2023?

16 A That was it. Other than at the scene
17 taking the photos and then later uploading. And
18 then I just met with them in that area and we went
19 home for the evening that night.

20 Q All right. So what was the next point of
21 your involvement in the investigation?

22 A The following day. It was 3/23, yeah.

23 Q 3/23. So let's talk about 3/23. Like,
24 what did you do to assist in the investigation on
25 March 23rd?

1 A Well, because of that Flock hit in that
2 area and the potential -- they knew a name. After
3 discussion with people involved, the name Kosowski
4 had come up. So to rule that name out or look into
5 that name, they knew that he had a residence in that
6 area. So they wanted to find further video of any
7 business or whatsoever that would capture that truck
8 in the position and where it was headed.

9 So we just branched out and everybody took
10 different streets and started looking for
11 possibilities of cameras.

12 Q All right. And at what point in the
13 investigation did Dr. Kosowski's name come up?

14 A Well, that was early on because that was
15 the meeting he was supposed to have with him, Cozzi
16 was supposed to have. But that was just me hearing
17 that they were trying to find out where he could
18 have gone, what could have happened, and who might
19 have been involved and that name had come up. It
20 just so happened he lived in Tarpon Springs, which
21 is close to where that Flock camera was captured.

22 Q So as far as your involvement is
23 concerned, what areas did you go to to try to check
24 for additional surveillance footage?

25 A That day I went to the Tarpon Middle

1 School which is just north of the high school. But
2 I started there first because that school is
3 directly across from where Kosowski resides, in that
4 neighborhood. There's some streets that lead down
5 west from the school.

6 So I met with the SRO. I can't remember
7 her name, Johnson. I don't know her first name.
8 And she checked the video surveillance for me and
9 then at one of the cameras, they call it camera
10 8.11, it's a bike rack camera, it faces westbound on
11 the school, at 11:56 they captured a similar-looking
12 dark-colored truck start to pass by the school and
13 then turn down, I believe it was -- I can't remember
14 the name of the street. There's a street right
15 across. Oh, Explorers Drive. So it turned
16 westbound on Explorers Drive and headed that way.

17 Q All right. You mentioned this
18 dark-colored truck. What information, like, did you
19 receive -- who told you that you needed to be
20 looking for a dark-colored truck and, like, what
21 information did you receive about the truck?

22 A That was just the information that it
23 captured on the Flock camera was a dark-colored
24 Tundra.

25 Q Okay.

1 A Tundra and dark-colored truck.

2 Q All right. Sorry to interrupt. So you
3 knew you needed to look for a dark-colored truck
4 based on what was captured on the Flock camera?

5 A Correct, yes.

6 Q Oakly. And your report also indicates that
7 you went to Tarpon Springs High School as well?

8 A Yes. The SRO Johnson, she contacted the
9 SRO there. He checked the cameras at 11:55, so one
10 minute prior to that. Because the high school is
11 south of the middle school. So he captured on one
12 of his outside cameras a -- same vehicle traveling
13 by the school.

14 So those were all stored by school's
15 police. So I wasn't able to get a video that day,
16 but I put in a request to get the video from them at
17 a later day.

18 Q All right. Did you go to any other, like,
19 points of interest in this neighborhood on this
20 particular day?

21 A Yeah. Once that was observed and then it
22 appeared that that vehicle had traveled down
23 Explorers, then they just -- detectives met in the
24 area and starting going to different homes in that
25 area to see if they had outside surveillance could

1 track that truck where it possibly went from there.

2 Q Right. And your report indicates that you
3 went to Grand Central Drive.

4 A Yes.

5 Q What did you do over in the area of Grand
6 Central Drive?

7 A That's the road leading up to it. I just
8 started looking for homes with cameras. Other
9 detectives had already been in the area. So they
10 had pretty much made contact with anybody that had a
11 camera.

12 And then they were starting to review one
13 particular video that showed the truck traveling
14 westbound past the house. So I didn't make any
15 contact with anyone other than just standing by to
16 see what their course of action was then.

17 Q All right. And circling back to that
18 dark-colored truck. In your investigation, have you
19 or anyone at Largo Police Department witnessed
20 Dr. Kosowski driving a Toyota Tundra?

21 A No.

22 Q So going back to Grand Central Drive.
23 What time did you arrive in that area of Grand
24 Central Drive?

25 A I don't know if I -- it was in the evening

1 hours, but I don't have a specific time. It was
2 afternoon, slash, in the evening. It was still
3 daylight.

4 Q All right. And once you finished checking
5 to the residences that were in the area of Grand
6 Central Drive, did you have the occasion to go to
7 511 Seaview Drive?

8 A I did, yes.

9 Q And that's the roadway -- so Grand
10 Central, in your report you indicate that's the
11 roadway leading up to Seaview Drive. So you ended
12 up taking Seaview Drive and going to 511 Seaview?

13 A Correct, yes.

14 Q All right. So what time did you arrive at
15 511 Seaview Drive?

16 A I don't have the time written down. It
17 was still daylight hours though but it was evening
18 hours. Because I was positioned outside the area
19 and people were coming home from work at shortly
20 after we set up there.

21 Q All right. And that's what your report
22 states. It states that you set up -- you began to
23 set up at 511 Seaview Drive.

24 So where particularly? Like, did you set
25 up on the property, across from the property, next

1 to the property?

2 A Just north of the property I would say.
3 Because it curves around the corner. It becomes
4 another dead end. So pretty much where the dead end
5 is. Because that home is the furthest home on that
6 street before it makes another eastbound turn.
7 There was a couple homes along the park there. So
8 right along the parkway and right in front of the
9 home.

10 Q All right. And you said that you were
11 positioned there. So what were you doing in that
12 area of 511 Seaview Drive?

13 A Waiting on the street to see which
14 residence, if any -- I knew that was Tomasz
15 Kosowski's residence by the address that was
16 provided.

17 But anything in between there before they
18 found the camera down the street to see if any -- we
19 saw any vehicles come and go from that area matching
20 the description.

21 Q Okay. And so while you were maintaining a
22 visual on Dr. Kosowski's residence, did you see
23 anyone come home that lived in the general area of
24 Dr. Kosowski's residence?

25 A Yes. There at 502 is Daniel Betts and

1 Kristen Betts. They lived directly across the
2 street from him.

3 Q All right.

4 A So on the east side of the road across the
5 street from him.

6 Q And it appears -- sorry, I just got a
7 Amber alert and it's like irritating me. Okay. My
8 phone just like --

9 A If you got it, we're all going to get it.

10 Q Sorry about that. It was a distraction.
11 Oh, okay, back to where I was. So your
12 report indicates that you did make contact with
13 Mr. Betts and Mrs. Betts.

14 A Yes. There it is. We're all getting it.

15 Yeah, they both came home from work at
16 pretty much the same time. I can't remember who I
17 was speaking to first. I think I may have been
18 speaking to Mrs. Betts and then he arrived home,
19 pulled in the driveway while I was standing there
20 talking to her.

21 Q All right. Was your conversation with
22 either Mr. Betts or Mrs. Betts recorded in any way?

23 A It was not.

24 Q All right. Were you wearing your
25 body-worn camera on this particular day?

1 A No.

2 Q Did you have a department-issued cell
3 phone?

4 A We do, yeah. I'm not sure if the body
5 cameras were issued by then. I don't know.

6 Q Did it occur to you to use your cell phone
7 to record any interactions you had with Mr. Bets?

8 A No.

9 Q All right. Did you have an opportunity to
10 review surveillance footage from 502 Seaview Drive?

11 A 502. No, I -- they had a -- from what I
12 remember, they had a doorbell camera that was not
13 functional.

14 Q As far as 511 Seaview Drive is concerned,
15 did you go on the property during your time there on
16 that particular day?

17 A No.

18 Q Did you take any photos of the property?

19 A No.

20 Q Did you search the perimeter of the
21 property or the back yard of the property?

22 A No.

23 Q Were you present during the execution of
24 the search warrant at the residence at 511 Seaview
25 Drive?

1 A I was not, no.

2 Q All right. So you weren't on scene at
3 all?

4 A No. I mean it was in the roadway, but I
5 left prior to them receiving the warrant and
6 executing the warrant.

7 Q At any point while you were on scene was
8 the garage door of the residence at 511 Seaview
9 Drive opened prior to the search warrant being read
10 on scene?

11 A No.

12 Q Did you look in the garage prior to the
13 search warrant being executed?

14 A No.

15 Q At this point did you have knowledge that
16 Dr. Kosowski owned a Toyota Tundra at this point?

17 A No.

18 Q Did any Largo Police Department personnel
19 at this point indicate that they knew Dr. Kosowski
20 owned a Toyota Tundra?

21 A They didn't know. The only information I
22 had was the Betts family I had asked them what
23 vehicle he owned. They knew he owned a Corolla.
24 But they had said they had seen him with a Toyota
25 Tundra. They thought he had just purchased it

1 recently because it was a newer truck, but they had
2 only seen it occasionally at the residence.

3 Q All right. Okay. So you left prior to
4 the search warrant being executed, right?

5 A I did. Because there was an alert on the
6 Corolla that Kosowski was driving. It was possible
7 that it was headed back to the area because it was
8 captured on a westbound tag reader from the area of
9 Miami. So they thought maybe he was heading back
10 home.

11 So while the search warrant was going on,
12 while they were requesting it, I was positioned down
13 the street the entire time.

14 Q All right. And so what time did you leave
15 the area of 511 Seaview Drive on this particular
16 day?

17 A It was dark. It had gotten dark. I don't
18 know the exact time. Maybe 8:00 at night.

19 Q Thank you. So I would also like to ask
20 you about your involvement in this case on
21 March 24th of 2023. Does that ring a bell for you?

22 A Yes.

23 Q Okay. So on March 24th of 2023 you
24 indicate in your report that you met with Jake
25 Blanchard at the law firm at 1501 6B South Belcher

1 Road.

2 A Yes.

3 Q All right. So your report also indicates
4 that you collected DNA samples from items in
5 Mr. Cozzi's office.

6 A I collected the mug. He was -- he had a
7 cup of coffee that had just been left on his desk.
8 It was sitting on the warmer which was still on. So
9 I collected the coffee mug.

10 Q All right. And while you were at the law
11 office, did you engage in any conversation with
12 Mr. Blanchard about the case?

13 A No.

14 Q So you mentioned the mug that was left on
15 the mug warmer. Did you collect any other evidence
16 from Mr. Cozzi's office?

17 A No.

18 Q Did you take any additional photos or
19 anything?

20 A No.

21 Q All right. Once you collected this item
22 of evidence, you then responded to the home that
23 Mr. Cozzi shared with his husband, Michael
24 Montgomery?

25 A Yes.

1 Q All right. And you said that you obtained
2 elimination buccal swabs. Like what exactly do you
3 mean by that?

4 A From his -- inside his mouth to obtain DNA
5 from him. So buccal swabs of his DNA for
6 comparison.

7 Q When you say him, who are you talking
8 about?

9 A Mr. Montgomery, Michael Montgomery.

10 Q Okay. So you got elimination buccal swabs
11 from Mr. Montgomery.

12 A Yes.

13 Q And you also obtained an Oral B electric
14 toothbrush that was said to belong only to
15 Mr. Cozzi?

16 A I did.

17 Q All right. You then responded to Pinellas
18 County Sheriff's Office evidence and collected some
19 swabs that had been processed from the Toyota Tundra
20 and the garage at 511 Seaview Drive?

21 A Yes.

22 Q All right. Did you put the swabs from the
23 items belonging to Mr. Cozzi together with the swabs
24 collected from the Toyota Tundra and the swabs
25 collected from the garage?

1 A Like together in the same package?

2 Q Yes.

3 A No.

4 Q All right. Were these items placed in the
5 same transfer container together?

6 A No.

7 Q Were these items placed in the same
8 evidence bag together?

9 A No.

10 Q Did you collect any additional items
11 besides the Oral B toothbrush head from the
12 residence that Mr. Cozzi shared with his husband?

13 A Not that day.

14 Q All right. And then your report further
15 indicates that you entered all of these items into
16 evidence at Largo Police Department?

17 A Yes.

18 Q All right. And then you transferred all
19 of the items to the Pinellas County forensic
20 laboratory for further processing?

21 A Correct, yes.

22 Q All right. How does that transfer take
23 place? Like, how did you transfer those items?

24 A The items from the Pinellas County
25 Sheriff's Office are already in envelopes packaged.

1 So we just then -- we don't open them. We repackage
2 them inside our envelope. Why, I don't know.
3 That's our procedure.

4 So I repackaged them, just placed them
5 inside of one of our envelopes, write our
6 information on it, seal it. They have to log it in
7 to our evidence to keep a record of it. And then I
8 took those items, drove them to PCFL myself and then
9 they logged them into their system.

10 Q Okay. So you physically drove them to
11 Pinellas County forensic laboratory?

12 A Yes.

13 Q All right. And did you place all of the
14 swabs were collected together in the same bag?

15 A No.

16 Q So they were all in separate bags?

17 A Correct.

18 Q Which were sealed?

19 A Yes.

20 Q So I would like to ask you about the
21 search warrant that was executed on the Toyota
22 Corolla in this case.

23 A Yes.

24 Q So on March 25th of 2023, referring to
25 that part of your involvement, did you respond to 34

1 West Orange Street in Tarpon Springs?

2 A I did, yes.

3 Q All right. Your report indicates that you
4 remained at the traffic stop throughout the evening.

5 A Yes.

6 Q Is that, is that fair? Okay. What did
7 you do while you were at the scene of the traffic
8 stop throughout the evening?

9 A Not much of anything. I stood by with
10 Tarpon Police. Because he was in the back of one of
11 their cruisers. So I just stood outside the cruiser
12 almost the entire night while Detective Bolton and
13 everybody else worked with the vehicle. I didn't
14 have any involvement with the vehicle.

15 Q When you say he, are you talking about
16 Dr. Kosowski being detained in the Tarpon --

17 A I'm sorry, yes, Dr. Kosowski was detained
18 in the back of the vehicle.

19 Q No need to apologize. It's my job to get
20 that clarification.

21 So why was Dr. Kosowski detained for so
22 long in the back of the cruiser?

23 A I do not know. I know they were waiting
24 on a search warrant for vehicle and a body warrant.

25 Q And what time did you arrive at the scene

1 of the traffic stop?

2 A It says at 1519. So 3:19. That's when
3 the traffic stop was conducted. I was actually a
4 little bit earlier to try and communicate with
5 Tarpon to determine when the traffic stop was gonna
6 be made and where. So they made the determination
7 to make the stop there.

8 Q Which Largo Police Department personnel
9 were present during the search of the Toyota Corolla
10 at the scene of the traffic stop?

11 A Quite a few. I know Detective Bolton was
12 there. That's the main person. Detective Hunt.

13 Q Anyone else?

14 A There were others, but I just don't know
15 everybody that was there.

16 Q All right. So did you assist in the
17 search of the Corolla?

18 A I did not, no.

19 Q All right. While you were on scene, did
20 you have the opportunity to see the trunk of the
21 car, like, be opened in any way?

22 A I saw them opening it. They were
23 processing the vehicle.

24 Q Who opened the truck?

25 A Pinellas County I guess the -- I'm not

1 sure what they're called. But the evidence
2 technicians.

3 Q All right. You didn't see anybody from
4 Largo Police Department open the trunk?

5 A I did not see anybody open the trunk.

6 Q Did you look inside the trunk at all while
7 you were on scene?

8 A No.

9 Q Did you handle any of the items that were
10 in the trunk while you were on scene?

11 A No. I observed the trunk open as I was
12 standing outside the vehicle, but I didn't examine
13 anything in the vehicle.

14 Q All right. Who closed the trunk to the
15 vehicle?

16 A I don't know.

17 Q So you mentioned that there was a search
18 warrant and a body warrant that was being obtained
19 during your time at the scene of the traffic stop.

20 To your knowledge, what caused the delay
21 in getting the body warrant?

22 A I don't know.

23 Q Why was Dr. Kosowski detained for the
24 search of the Toyota Corolla?

25 A He was placed in custody at that time for

1 their detention until they obtained those items, the
2 warrant and the body warrant.

3 Q Okay. So Dr. Kosowski then was detained
4 like pending y'all obtaining the body warrant and
5 the search warrant?

6 A I believe -- I don't know if they were
7 working on an arrest warrant, but I know all the
8 warrants they were obtaining. So he was detained
9 until those were issued.

10 Q Okay. So as it relates to the search
11 warrant, why wasn't the search warrant read to
12 Dr. Kosowski while he was on scene?

13 A I don't know. I didn't perform that.

14 Q Was he still detained after the search of
15 the Toyota Corolla was completed?

16 A Yes.

17 Q Why?

18 A At some point he was in custody.

19 Q At what point was Dr. Kosowski in custody?

20 A I don't know. I just know that he was. I
21 don't know a time. I know once they obtained all
22 their warrants and the information they were issued
23 to him and then he was placed in custody.

24 Q Okay. What probable cause was established
25 that led to Dr. Kosowski being arrested for murder

1 after the body warrant was executed?

2 A I don't know. I didn't write it.

3 Q So you don't have any knowledge as it
4 relates to probable cause?

5 A Not with this case. I didn't read the
6 entire warrants that they issued.

7 Q Were you present when Detective Bolton was
8 engaged in conversations with Dr. Kosowski during
9 the traffic stop?

10 A No.

11 Q So you weren't present during those points
12 in time?

13 A No.

14 (Mr. Brunvand joins the virtual
15 deposition.)

16 Q Where were you? Because you indicated
17 that you had remained right there with the Tarpon
18 Springs Police --

19 A Yeah, they were standing on the sidewalk
20 and I was outside on the sidewalk. Detective Hunt
21 and Detective Bolton were the ones that spoke to
22 him.

23 Q Right. And so you weren't present when
24 Detective Bolton and Detective Hunt had made contact
25 with Dr. Kosowski on multiple occasions throughout

1 that night?

2 A I did not stand by while they were talking
3 to him.

4 Q All right. Thank you. Were you present
5 when the body warrant was executed?

6 A Yes.

7 Q And that was at the holding cell at Tarpon
8 Springs Police Department?

9 A Correct, yes.

10 Q Were you present when Dr. Kosowski
11 requested to use the bathroom prior to the execution
12 of the body warrant?

13 A He requested. I did not take him to the
14 restroom though. I'm not sure who went with him.

15 Q All right. So you remained on the scene
16 then until the body warrant was executed and then
17 you went with personnel to Tarpon Springs Police
18 Department holding cell to witness the execution of
19 the body warrant.

20 A Yes.

21 Q All right. So once that execution of the
22 body warrant was completed, like did you have any
23 further involvement in this case on the particular
24 day that I'm talking about? Which actually it's two
25 days. It's March 25th, 2023, and then going into

1 the early morning hours of March 26th, 2023.

2 A Yes. No, that was my last involvement.

3 Once he was placed in a transport van, I was

4 released from the scene.

5 Q All right. So what time did you leave the
6 scene?

7 A It was light. Maybe -- I put in here at
8 1- -- around approximately -- 100 that he was
9 transported to the holding cell. So I would say we
10 were only there about an hour while they finished
11 that up, collected everything.

12 So whatever time it was after that. As
13 soon as he -- they -- as soon as they went to
14 transport him I was released.

15 Q All right. I'd like to ask you about some
16 further involvement that you had on the case on
17 March 30th of 2023. You with me?

18 A I am, yeah.

19 Q Okay. Perfect.

20 A You're going in order. There's actually a
21 29th. So I wasn't sure if you wanted to go over
22 that one.

23 Q Well, no, I appreciate you pointing that
24 out.

25 A Okay.

1 Q Thank you so much. I, I didn't have any
2 pertinent questions to ask about that except --

3 A Okay.

4 Q -- for one and now that it occurred to me.
5 So you indicated on -- like, stepping back
6 now one day to March 29th of 2023. In your report
7 you indicated that you had met with Michael
8 Montgomery at his residence, right?

9 A Yes.

10 Q Who told you or, like, directed you to
11 take photos of his two dogs?

12 A Detective Bolton.

13 Q Okay. So you were there because Detective
14 Bolton had told you to take photos of the dogs?

15 A Yes. He asked me to go there and take
16 samples from each dog separately and then take
17 photos of the dogs.

18 Q All right. Was there a particular reason
19 that Detective Bolton had for having you do that?
20 Did he say?

21 A Just to have extra samples for comparison.

22 Q Did you take any photos of anything else
23 at the residence besides the two dogs?

24 A No.

25 Q Did you collect anything else besides the

1 hair samples from the two dogs?

2 A No.

3 Q And the photos of course?

4 A Right, just the photos and the hair.

5 Q All right. So moving on to your
6 involvement on March 30th of 2023.

7 A Yes.

8 Q And this portion of your involvement in
9 this investigation you obtained some video from
10 Tarpon Springs Middle School and Tarpon Springs High
11 School. Right?

12 A Yes, I did.

13 Q All right. And then there was also some
14 case evidence that was from Pinellas County
15 Sheriff's Office forensics that was picked up by
16 Detective Gay. Are you with me so far?

17 A Yes.

18 Q All right. Great. So as it relates to
19 those items of evidence, did you take custody of
20 items from this collection to be processed by
21 Pinellas County forensic laboratory?

22 A I did, yes.

23 Q All right. So your report indicates that
24 you picked up several items. You picked up a buccal
25 swab from Dr. Kosowski.

1 A Yes.

2 Q Okay. Two swabs from the original crime
3 scene bathroom at 1501 South Belcher.

4 A Yes.

5 Q And then two swabs from the Toyota
6 Corolla?

7 A Yes.

8 Q All right. Did you put the swabs from the
9 Toyota Corolla together with the swabs from the
10 crime scene bathroom?

11 A No.

12 Q Okay. Were these items placed in the same
13 transfer container or evidence bag?

14 A No.

15 Q As you did with earlier items, you entered
16 all of these items into evidence at Largo Police
17 Department?

18 A Correct.

19 Q And then you transferred all of the items
20 to Pinellas County forensic laboratory by physically
21 driving them there?

22 A Yes.

23 Q All right. Did you place all of these
24 swabs together while you were driving them to
25 Pinellas County forensic laboratory for additional

1 processing?

2 A No.

3 Q Did you collect any other items of
4 evidence from the evidence collection that Detective
5 Gay had obtained?

6 A No.

7 Q Once you had delivered those items to the
8 Pinellas County forensic laboratory, did you have
9 any further involvement in this case?

10 A No. Just the next day is actually when I
11 collected the video.

12 Q Were you present during any further
13 investigation that was done in Collier County,
14 Florida?

15 A I did not go to Collier County. No, I did
16 not go down there.

17 Q And you weren't present during the
18 processing of a dumpster that was found south of
19 where we are now?

20 A I did not go, no.

21 Q All right.

22 MS. RAMOS WICKS: Thank you. I don't have
23 any further questions. I would like to note
24 that Mr. Brunvand did pop in. So I'm gonna
25 pass it to him to see if he has any questions.

1 THE WITNESS: Okay.

2 MR. BRUNVAND: I don't have any questions.

3 Thank you.

4 MS. RAMOS WICKS: You're welcome.

5 And then also Ms. Tuomey, I'm gonna check
6 in with her and see if she has any questions.

7 MS. TUOMEY: Thank you. I don't have any
8 questions.

9 MR. VONDERHEIDE: No questions. He'll
10 read.

11 MS. SPADARO: No questions.

12 (The deposition was concluded at 4:10
13 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 11, 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.

RICHARD OWENS

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF POLK)

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

WITNESS my hand and official seal this 27th
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 RICHARD OWENS, that a view of the transcript was requested
9 and that the transcript is a true and complete record of my
10 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 27th day of December 2024.

18 
19
20

21 TAMMY KELLEY
22
23
24
25

December 27, 2024

Mr. Richard Owens
rowens@largo.com

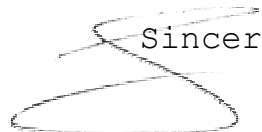
Dear Mr. Owens:

Your deposition taken in State of Florida versus Tomasz Kosowski on September 11, 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 read 'Tammy Kelley', with a large, stylized initial 'T'.

Tammy Kelley