IN THE CIRCUIT COURT OF THE
SIXTH JUDICIAL CIRCUIT OF THE
STATE OF FLORIDA IN AND FOR PINELLAS COUNTY

STATE OF FLORIDA,

Plaintiff,

VS.

CASE NO. 23-02935CF

TOMASZ KOSOWSKI,

Defendant.

VIRTUAL DEPOSITION OF ATEKA SANFORD

DATE: April 9, 2024

TIME: 3:47 p.m.

PLACE: Various Remote Locations

Via Zoom Video Communications

TRANSCRIBED BY

REPORTER: KIMBERLY L. RENFROE, RPR

Stenographic Reporter

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

VIRTUAL APPEARANCES:

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For the Defendant

ALSO PRESENT:

Kimberly G. Kittrell, Notary Virtual Monitor

INDEX

April 9, 2024
VIRTUAL DEPOSITION OF ATEKA SANFORD
Direct Examination by Mr. Brunvand4
ERRATA SHEET29
CERTIFICATE OF OATH30
REPORTER'S DEPOSITION CERTIFICATE31
READ AND SIGN LETTER 32

- 1 DEPOSITION IN DISCOVERY
- 2 ATEKA SANFORD
- 3 Pursuant to notice duly given, the virtual
- 4 deposition of ATEKA SANFORD, called by the Defendant in
- 5 the above-styled cause, was recorded by Kimberly G.
- 6 Kittrell, a Notary Public in and for the State of
- 7 Florida at Large, at the time and place and in the
- 8 virtual presence of counsel enumerated on Page 2 hereof.
- 9 Thereupon, it was stipulated and agreed by and
- 10 between the attorneys for the respective parties, by and
- 11 with the consent of the said ATEKA SANFORD, that
- 12 signature to the said deposition be reserved.
- 13 THE NOTARY: If you'll raise your right hand.
- Do you swear or affirm that the testimony
- 15 you're about to give will be the truth, so help you
- 16 God?
- 17 THE WITNESS: I do.
- 18 THE NOTARY: Thank you.
- 19 ATEKA SANFORD, having been first duly sworn via
- 20 Zoom Video Communications, upon interrogation in
- 21 discovery, testified as follows:
- 22 DIRECT EXAMINATION
- 23 BY MR. BRUNVAND:
- 24 Q. Good afternoon. My name is Bjorn Brunvand. I
- 25 represent Tom Kosowski. Also present from my firm here

- 1 today is Willengy Ramos-Wicks; and Alexandra Spadaro and
- 2 Nathan Vonderheide is here for the State.
- 3 If you could please state your full name.
- 4 A. My name is Ateka Sanford.
- 5 Q. And how are you employed?
- 6 A. I am currently employed as assistant
- 7 supervisor for the Forensic Science Division at the
- 8 Pinellas County Sheriff's Office.
- 9 Q. And how long have you been so employed?
- 10 A. I have been with the sheriff's office for over
- 11 11 years, three as an assistant supervisor.
- 12 Q. All right. Any prior law enforcement
- 13 experience prior to the sheriff's office?
- 14 A. Yes. Prior to working at the sheriff's office
- 15 I worked for the Saint Pete Beach Police Department for
- 16 11 years as a communications officer and an
- 17 identification technician.
- 18 Q. Okay. And -- and an identification technician
- 19 is someone who does what?
- 20 A. Basically just a crime scene investigator.
- 21 That was just their name for it.
- Q. Okay. All right. Very good.
- I want to take a look here and see, make sure that
- 24 I have all the reports that you may have authored
- 25 involving your in -- involvement in this case.

- 1 So it appears to me that I have two separate
- 2 reports. One is a three-page report; the narrative in
- 3 that report is slightly more than a half a page and it
- 4 deals with you responding to 1501 South Belcher Road on
- 5 or about March 21st, 2023.
- 6 And then the second one I have is a two -- no,
- 7 four-page report.
- 8 A. Uh-huh.
- 9 Q. And the narrative goes over two pages and it
- 10 involves March 25th, 2023.
- 11 Are those all the reports that you have prepared in
- 12 this case?
- 13 A. Yes. Just the two supplements, yes.
- Q. Okay. Have you had an opportunity to review
- both of those supplements prior to coming in here today?
- 16 A. Yes, I did.
- 17 Q. And are they complete and accurate?
- 18 A. Yes.
- 19 Q. Okay.
- Let's talk about how you first became involved in
- 21 this case.
- MR. BRUNVAND: Oh, excuse me one second. I --
- I forgot to activate the recording.
- Let me see here.
- 25 All right. Sorry. I -- I -- normally I would

- 1 start the recording earlier. I hope you have no
- 2 objection to it being recorded?
- THE WITNESS: No, I do not.
- 4 MR. BRUNVAND: Okay.
- 5 Q. (By Mr. Brunvand) So anyways, why don't you
- 6 tell us about how you first became involved in this
- 7 case.
- 8 A. Initially, on March 21st of 2023 I was
- 9 requested to respond to the 1501 South Belcher Road
- 10 location reference a missing person investigation.
- 11 Q. And at what time did you first respond to that
- 12 location?
- 13 A. I received the request to respond at 1857 and
- 14 I arrived on scene at 1908 hours.
- 15 Q. Okay.
- And what, if any, information had you received
- 17 prior to responding to the scene?
- 18 A. I had just received information that Largo
- 19 Police Department was investigating a missing person
- 20 with suspicious circumstances at the location due to a
- 21 large amount of blood being located.
- 22 Q. Okay. And who provided that information to
- 23 you?
- A. My lieutenant.
- 25 Q. Okay. And your lieutenant is who?

- 1 A. That would be Wayne Gross.
- Q. Okay.
- When you arrived at the scene did -- did -- what
- 4 did you see?
- 5 A. Initially, when I arrived on scene, I staged
- 6 in the parking lot to have a briefing with the other
- 7 crime scene technicians and my lieutenant who were
- 8 already on scene.
- 9 Q. Okay. And tell me about that briefing then.
- 10 When -- when -- what information did you get at that
- 11 time?
- 12 A. So we had a group that had already been there
- 13 and taken some initial photographs and documented some
- 14 areas and they were relieving the scene for myself and
- 15 two other specialists to take over the documentation.
- 16 So they base -- basically briefed us on what they had
- 17 already photographed and documented.
- 18 Q. Okay. And, specifically, what -- how --
- 19 what -- what do you recall about what they briefed you
- 20 on?
- 21 A. So basically they advised me that exterior
- 22 photos of the building had been completed as well as
- 23 general photos of the office area to exclude the
- 24 bathroom where they had been told there was a large
- 25 amount of blood. At that time, forensics personnel had

- 1 not entered that area of the office building.
- 2 Q. Okay. All right.
- Other than the people that were part of your team,
- 4 was anyone else present from -- other members of law
- 5 enforcement?
- 6 A. There were some members of law enforcement
- 7 from the Largo Police Department.
- 8 Q. Okay. Do you remem -- do you know who they
- 9 were?
- 10 A. As I do not work with them on a regular basis
- 11 to put names and faces, I -- I could not say for sure.
- 12 Q. Okay. All right.
- 13 What's the next thing that happens?
- 14 A. So after they explained what they
- 15 photographed, I did a brief walk-through of the office
- 16 building with Supervisor Klein and she showed me the
- 17 attorney's office and a hallway leading to two vacant
- 18 offices and pointed out a -- a electrical closet that
- 19 may or may not have been of importance. And then as we
- 20 came back out, we walked into the hallway where the
- 21 bathroom in question was located; without actually
- 22 entering the bathroom, she just pointed out the door.
- Q. Okay. Then what do you do?
- 24 A. So after the other group was relieved to leave
- 25 and I took over as supervisor of the scene. And then at

- 1 that point, I had two specialists with me,
- 2 Specialist King -- who is now Specialist Copeland, she
- 3 since got married -- and Specialist Levesque. So I gave
- 4 them their assignments as to what they would do for
- 5 documentation and then they begin working and I
- 6 basically stood by to be a liaison between them and
- 7 detectives on scene should it be needed.
- 8 Q. Okay. And you said then one of the people has
- 9 recently gotten married and has a different; who is
- 10 that?
- 11 A. That was -- in my report I refer to her as
- 12 Specialist King. She is now Copeland.
- 13 Q. Copeland. Okay. All right.
- 14 All right. So -- so you're basically just sort of
- 15 the -- the go-between between law enforcement and --
- 16 and -- and the other forensic specialists that are
- 17 working with you and for you?
- 18 A. Yes, correct.
- 19 Q. Okay.
- 20 Do you recall anything else about this day as far
- 21 as any communications between law enforcement and
- 22 yourself or anything that took place out of the ordinary
- 23 other than what we discussed and what's in the report?
- A. No, nothing in addition to what's in the
- 25 report.

- 1 Q. Okay.
- 2 Is -- does that conclude your involvement on the
- 3 21st of March?
- 4 A. Yes, that concludes my involvement.
- Q. Okay.
- 6 So let's go to the -- the next date that you are
- 7 involved in this case. And I believe that is on the
- 8 25th?
- 9 A. Correct. March 25th of 2023.
- 10 Q. Okay. All right.
- 11 Tell us what you -- what did you do on that day?
- 12 A. So on this date I responded to the Forensic
- 13 Sciences Division. We have a secure evidence garage we
- 14 use to secure vehicles for processing and I responded to
- 15 that location to assist in processing a vehicle that had
- 16 been towed there via -- with a search warrant.
- 17 Q. Okay. And -- and do you recall what vehicle
- 18 that was?
- 19 A. It was a 2020 red Toyota Corolla.
- 20 Okay. And -- let's see here.
- 21 So it appears that Specialist Levesque photographed
- 22 the vehicle and -- and things inside the vehicle?
- 23 A. Yes. She was the primary. I was there as a
- 24 supervisor and then offered her assistance as needed.
- Q. Okay. Did you take any photographs?

- 1 A. I did not.
- Q. Okay.
- 3 You -- it appears that you then assisted with
- 4 latent fingerprint processing. Tell us about that.
- 5 A. So after the vehicle was thoroughly documented
- 6 photographically and all items were documented, our last
- 7 step would be the latent processing of the vehicle
- 8 itself. So I did assist with the powder processing on
- 9 basically the passenger side of the vehicle.
- 10 Q. Okay. Basically just looking for latent
- 11 prints?
- 12 A. Correct.
- 13 Q. Okay.
- And it looks like you -- you identified three areas
- 15 where you obtained results for ridge de -- detail.
- Is that one lift for ridge detail in those three
- 17 areas or multiple lifts in those areas?
- 18 A. So I had a total of five latent lifts from
- 19 those three areas that are mentioned in my report.
- 20 Q. Okay. All right.
- 21 Did you do anything else beyond securing those
- 22 lifts?
- 23 A. So Specialist Levesque also processed the
- 24 vehicle using a chemical, luminol, to look for possible
- 25 blood. After she applied the luminol, areas of

- 1 luminescence I did swab those areas and collected those
- 2 swabs as possible blood swabs.
- 3 Q. Okay. And those are identified in your
- 4 report, it looks like, on -- on the -- on Page 4, the
- 5 final page?
- 6 A. Yes. Yes, that's correct.
- 7 Q. Starts out possible blood, lu -- luminol swab
- 8 front passenger seat back and -- and just goes on down
- 9 the list?
- 10 A. Yes. Those were the areas where luminescence
- 11 were observed, yes.
- 12 Q. And luminescence, in and of itself, does not
- 13 mean that it's blood; right?
- 14 A. That is correct.
- 15 Q. Okay. What else could it be?
- 16 A. It -- it could be a number of things. It
- 17 could be cleaning agents. The -- the luminol can react
- 18 with -- with other things. We're just documenting what
- 19 we view. It would be up to a -- a lab to test a swab to
- 20 determine if it was actually blood or not.
- 21 Q. Okay.
- 22 Indicated here, the -- the listed areas that were
- 23 positive for possible blood with luminol were also
- 24 tested for phenolphthalein?
- 25 A. Yes. Phenolphthalein is another presumptive

- 1 test for blood that we commonly use. So, in addition to
- 2 the luminol, I used the phenolphthalein on it. When I
- 3 use phenolphthalein -- I believe it was only one swab,
- 4 I'd have to refer to my report.
- 5 Q. Yeah. Feel free to refer to your report.
- 6 A. So out of all the areas that had luminescence
- 7 with the luminol and I collected swabs from those areas,
- 8 when I did further testing with phenolphthalein, only
- 9 the swab that was the interior trunk back tested
- 10 positive with phen -- phenolphthalein.
- 11 Q. And -- and why are you doing this second test?
- 12 A. Because it could be more sensitive than the
- 13 luminescence alone. Since the areas can luminesce that
- 14 aren't necessarily blood we also do the phenolphthalein
- 15 test as a second presumptive.
- 16 Q. Okay. And -- and what could be some false
- 17 positive on the phenolphthalein test?
- 18 A. Phenolphthalein could potentially react with
- 19 other chemicals as well. It's less sensitivity than
- 20 luminol so you're less likely to get a false positive.
- 21 However, we would still have to send it to the lab and
- 22 let the lab do a final test for determination. These
- 23 are all just presumptive for us.
- Q. And anything that's presumptive is -- is --
- 25 you -- you can't say that it's blood. Right?

- 1 A. Correct. That's why I refer to it as possible
- 2 blood, 'cause I cannot say a hundred percent certainty
- 3 even if it's a -- a positive reaction.
- 4 Q. Okay.
- 5 What do you do after you collect this information?
- 6 A. The -- what, do you mean information or the
- 7 items?
- Q. The items.
- 9 A. The items.
- 10 So the items would be packaged and then once
- 11 they're properly packaged we would submit them to the
- 12 Property and Evidence section.
- 13 Q. Okay.
- 14 And then what do you do?
- 15 A. As far as?
- 16 Q. Any -- do you do anything else at that point?
- 17 A. No -- just write my report.
- 18 Q. Just write your report. Okay.
- 19 A. Yeah.
- 20 Q. Did you observe Specialist Levesque and King,
- 21 who is now --
- 22 A. Copeland.
- 23 Q. -- Copeland, complete documentation and
- 24 collect forensic evidence in the electrical room at
- 25 1501 Belcher?

- 1 A. I observed some of the processing of the
- 2 electrical room but not to its completion.
- 3 Q. Okay.
- 4 Did you instruct them to collect latent prints from
- 5 the door and frame connected to the electrical room?
- 6 A. Yes. I had given them the instruction to
- 7 process those areas as well as other areas within the
- 8 electrical room. I don't believe they had completed the
- 9 door and the frame, they hadn't got to that area yet at
- 10 the time I had left, but I had told them it was
- 11 something that needed to be processed.
- 12 Q. Okay. Were there any problems with -- as it
- 13 relates to lifting prints from those areas?
- 14 A. Not that I'm aware of.
- 15 Q. Okay. What about as far as examining those
- 16 prints, do you -- you know, whatever they lifted from
- 17 those areas; were -- were there any problems as it
- 18 relates to that?
- 19 A. Not that I'm aware of. As a forensic
- 20 specialist we wouldn't be examining and comparing the
- 21 latent prints. That would be a latent print examiner.
- 22 Q. Okay. All right.
- 23 Were the -- but if there was a problem, would the
- 24 latent print examiner maybe come to you and say, hey, I
- 25 can't -- I can't exam -- evaluate these prints or can

- 1 you --
- 2 A. No, they -- they would not come to me as -- as
- 3 a forensic specialist, no.
- 4 Q. Okay. What if they wanted you to go out there
- 5 and -- and obtain additional latent, you know, lifts?
- 6 Does that ever happen where they say can you go back out
- 7 and -- and -- and do additional lifts from the same
- 8 area?
- 9 A. I've never had a latent print examiner request
- 10 that, no.
- 11 Q. Okay.
- 12 Are you aware of any issues relating to
- 13 contamination of the crime scene as it relates to the
- 14 door to the electrical closet?
- 15 A. I was not made of any specific issues, no.
- 16 Q. Okay.
- 17 Did Specialist King and Levesque -- or Copeland --
- 18 in -- in your opinion, perform the latent print
- 19 examination according to the stan -- established
- 20 standards and to your satisfaction?
- 21 A. Yes. From the portion that I observed, they
- 22 were doing everything correctly.
- 23 Q. Okay.
- 24 Do you know whether or not the electrical door was
- 25 processed a second time within, approximately, 24 hours

- 1 by Camacho or at -- at -- or with the instructions of --
- 2 of Supervisor Camacho?
- 3 A. I'm -- I'm not aware of that. I'm not
- 4 familiar.
- 5 Q. Okay. Any idea if that happened, why that
- 6 would happen within -- within a 24-hour time period?
- 7 A. I do not know.
- 8 Q. Okay.
- 9 You've -- I think you indicated in your report that
- 10 the Corolla was received from Supervisor Klein and
- 11 Detective Allred; was that accurate?
- 12 A. So when I arrived at the forensic garage,
- 13 Supervisor Klein and Detective Allred were present with
- 14 the vehicle.
- 15 Q. Okay.
- Do you know how long Detective Allred stayed at the
- 17 processing facility?
- 18 A. He was there the entire time that we were
- 19 processing the vehicle.
- 20 Q. Okay.
- 21 And what was he doing during that time period?
- 22 A. So, basically, he takes his own notes as to
- 23 what we discover and observe in the vehicle.
- Q. Okay. So are you guys reporting to him what
- 25 you're seeing then or --

- 1 A. Yes. We're -- we're conferring with him the
- 2 entire time, yes.
- 3 Q. Okay.
- 4 Do you know if anyone was wearing any type of body
- 5 cam recording? I mean, can we -- can we watch that or
- 6 would -- any type of --
- 7 A. Not that I'm aware of. He was in plain -- he
- 8 wasn't like in a police uniform so I --
- 9 Q. Okay.
- 10 Did -- did he -- did Detective Allred, in any way,
- 11 direct you or guide you in -- in what parts of the
- 12 Corolla to process and not process?
- 13 A. So in a call like -- case like this,
- 14 basically, we just process the vehicle from bumper to
- 15 bumper, 'cause at that point we don't know what may or
- 16 may not be evidentiary value, so we kind of process
- 17 everything.
- 18 Q. Okay. And -- and, I guess, so the guestion is
- 19 did -- did -- did you do that at his instructions
- 20 or did you do that because that's what you do in this
- 21 type of a case?
- A. One, it's what we do. And we also confer with
- 23 him and -- and let him know if he's looking for anything
- 24 specific. And he did advise that they wanted to know
- 25 if -- if we located any possible blood in the vehicle

- 1 that they would want to know that right away.
- Q. Did Detective Allred handle any of the
- 3 contents in the trunk of the car?
- A. No, he did not.
- 5 Q. How about the inside of the car, the interior
- 6 of the car?
- 7 A. Not that I'm aware of, no.
- 8 Q. You guys wear gloves when you're doing this
- 9 processing?
- 10 A. Yes.
- 11 Q. You frequently replace the gloves?
- 12 A. Yes, we do.
- 13 Q. How many gloves would you say --
- 14 A. For this, I -- I think we probably went
- 15 through a box each.
- 16 Q. A box each. And how many gloves are in a box?
- 17 A. Probably at least 200.
- 18 Q. Okay. So quite a few gloves?
- 19 A. Yeah. Quite a few gloves, yes. We're --
- 20 we're continuously changing our gloves.
- 21 Q. And the reason for that is why?
- A. So we don't have any contamination.
- 23 Q. Okay.
- When you're doing the luminol testing of the
- 25 Corolla, the cab -- both the cabin and the trunk, do you

- 1 do some sort of a positive quality control test?
- 2 A. Yes. Yes, we do. So luminol will react,
- 3 actually, to -- to pennies, so we use pennies to do a
- 4 control test of it to make sure it is luminescing
- 5 properly.
- 6 Q. All right.
- 7 Is there such a thing as a negative quality control
- 8 test for luminol?
- 9 A. Yeah. So if -- if it didn't luminesce like it
- 10 was supposed to then we would know that the chemical was
- 11 not working properly and we would have to get a new
- 12 chemical, basically.
- Q. And is this with the -- with the penny as
- 14 well?
- 15 A. Yes. For that particu -- that's how we test
- 16 that particular chemical.
- 17 Q. Okay.
- And I think you already answered this but I'm going
- 19 to ask you again.
- 20 The -- the areas of luminescence that -- that you
- 21 observed, both on the front seats and in the trunk, what
- 22 is the significance of that?
- 23 A. So we have areas of luminescence; that means
- there could possibly be blood there. Again, the
- 25 chemical can luminesce and react to other substances, so

- 1 that's why it's just a presumptive, 'cause it's just
- 2 possibly blood in those areas.
- 3 Q. Okay.
- 4 Does the luminol absorb into the carpet or the
- 5 upholstery?
- 6 A. It -- it is a wet chemical that's sprayed on,
- 7 so it would somewhat absorb, yes.
- 8 Q. Okay.
- 9 When you do the phenolphthalein test, if it does
- 10 not react, there's no reaction in the area where it was
- 11 luminescenced, what -- what's the significance of that?
- 12 A. It -- it means that the luminescing reaction
- 13 was probably not from blood.
- 14 Q. Okay.
- 15 And what are some of the agents that could give a
- 16 false positive result with luminol? I think you may
- 17 have answered it, but --
- 18 A. Household chemicals, particularly bleach is
- 19 the most common. It can react with things such as
- 20 metals like copper, like the penny. It can even react
- 21 to things such as veg -- certain vegetables like beets
- 22 and turnips.
- 23 Q. Okay.
- Does luminol and -- and phenolphthalein
- 25 cross-react? Meaning, you know, can one cause a

- 1 positive result from the other?
- 2 A. Not that I'm aware of.
- 3 Q. Is it important to document luminescence when
- 4 you -- you're seeing it with -- by taking photographs?
- 5 A. Yeah. So it's a -- the luminescence is --
- 6 it's a chemiluminescence reaction, so it's only a
- 7 temporary relaxion -- reaction and will fade; so once
- 8 you spray the luminol on you would want to photograph it
- 9 right away, otherwise it -- the luminescence will fade.
- 10 Q. Okay.
- 11 Let me see if I can pull up some photographs. So
- 12 it may take me a second.
- MR. BRUNVAND: If anyone else has any
- questions while I'm looking for these photos, feel
- 15 free to ask questions.
- 16 O. So -- let's see here.
- 17 So I don't know if -- if you're familiar with any
- 18 of these photographs, but -- are you familiar with some
- 19 of the photos that were taken?
- 20 A. Generally. There was a lot of them, though.
- 21 Q. Yeah, I know.
- Where the heck is it?
- Okay. So I'm going to show you three photos. One
- is going to be S2-DSC-0024.
- Let me see if I can -- let's see.

- 1 Are you able to see this?
- 2 A. Yes.
- Q. Okay. And I'm going to put it as bright as --
- 4 well, it is as bright as it gets.
- 5 Do you -- are you able to see anything on that
- 6 image that appears to be --
- 7 A. So --
- 8 Q. -- show --
- 9 A. -- on the -- on the image that -- that I have
- 10 here, it's -- the image itself is black. I can see --
- 11 Q. I know.
- 12 A. -- the number --
- 13 Q. Right.
- 14 A. -- but the rest of the screen is black.
- 15 Q. The rest of -- yeah. Well, that -- it is on
- 16 my end, too.
- 17 So from -- from what you're looking at, this
- 18 particular image, S2-DSC 0024, would it be fair to say
- 19 that you can't see anything other than black?
- 20 A. This particular -- yeah, it's just black.
- 21 Q. Okay. All right.
- 22 So I'm going to go to another one. There's just
- 23 two of these, so two -- two additional ones.
- So the next one is S2-DSC 0026. Are you able to
- 25 see it?

- 1 A. That -- again, it -- the -- my screen is --
- 2 everything's black.
- 3 Q. Right. Same on mine.
- And we've got one more. And this is S2-DSC 0027.
- 5 Can you see anything on that other than just black?
- 6 A. No, I do not see anything.
- 7 Q. Okay.
- 8 In your report, the final report that deals with
- 9 the luminescence, you mention the listed areas that were
- 10 positive for possible blood with luminol were also
- 11 tested with phen -- phenolphthalein.
- 12 Then it says: The interior trunk back wall was the
- only area of luminescence to result in positive result
- 14 for the presence of possible blood with phenolphthalein.
- 15 A. Yes.
- 16 Q. And can you -- can you point to -- to an image
- or -- or -- or something that would allow us to see what
- 18 you're describing in your report as it relates to this
- 19 area of luminescence?
- 20 A. I -- I would have to be able to see the
- 21 photographs to do that.
- 22 Q. Okay. Where would it be iden -- what report
- 23 would identify those specific photographs?
- A. That would be Specialist Levesque's report.
- 25 I'm not sure which supplement number is hers.

- 1 Q. Right.
- 2 A. She was the one taking the photographs on that
- 3 date.
- 4 Q. Okay.
- 5 MR. BRUNVAND: Hold on one second, I'll be
- 6 right back.
- 7 (A brief recess was taken.)
- 8 Q. So when I'm looking at Levesque's report it
- 9 doesn't really itemize the photographs.
- 10 Do you remember looking at a photograph or -- or --
- 11 or looking at it visually at -- while it was taking
- 12 place?
- 13 A. I was looking at it visually while it was
- 14 taking place. I -- I was present in the moment.
- 15 Q. And you did not take the photograph?
- 16 A. No, I did not.
- Q. Okay. So if -- if -- if the photographs that
- 18 we looked at earlier were the purported photographs of
- 19 the luminescence, unless -- unless her originals are of
- 20 better quality than what we looked at, you would agree
- 21 that the three that we looked at did not appear to show
- 22 anything other than black.
- 23 A. I can say the three photographs you showed me
- 24 did not appear to show anything other than black.
- 25 Whether or not those are the photographs of that area, I

- 1 do not know.
- 2 Q. Okay.
- 3 Would you be able to, at -- at your leisure, speak
- 4 with Levesque and -- and try to identify what -- what
- 5 photos, if any, reflect what you saw?
- 6 A. I could review the photographs and see if I
- 7 can locate them in -- amongst the photographs she took.
- 8 Q. And then identify them by number to -- to
- 9 Mr. Vonderheide and then he can share the information
- 10 with me?
- 11 A. Yes, I could do that.
- 12 Q. That would be great.
- MR. BRUNVAND: I don't believe I have any
- other questions. Let me just confirm that. One --
- one second.
- Wait a minute. Wait a minute.
- 17 That was -- no, I'm looking at the wrong
- 18 notes. Sorry.
- 19 Q. Were you -- were you able to see -- were
- 20 the -- except for where -- what -- what appears to be
- 21 luminescing and -- and then possible blood, were you
- 22 able to see actual blood in the back of the --
- 23 A. I don't recall in the trunk itself.
- Q. Okay. All right.
- MR. BRUNVAND: That's all the questions I

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Page 28
 1
          have.
 2
               Willengy, do you have any questions?
 3
               MS. RAMOS-WICKS: I don't have any questions.
               MR. BRUNVAND: Okay.
 4
 5
               MR. VONDERHEIDE: I don't have any questions
 6
          either.
 7
               MS. SPADARO:
                              No questions.
 8
               MR. BRUNVAND: All right.
 9
               You want to read or -- or waive?
10
               THE WITNESS:
                              I'll take a read, please.
11
               MR. BRUNVAND: Okay.
12
13
                (THEREUPON, the virtual deposition concluded
14
          at 4:32 p.m.)
15
16
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		Page	29
1	ERRATA SHEET		
2	IN RE: State of Florida versus Tomasz Kosowski		
3	DATE TAKEN: April 9, 2024		
4	WITNESS: ATEKA SANFORD		
5	Page Line Correction Reason		
6		_	
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21	Under penalties of perjury, I declare that I have read		
22	the foregoing document and that the facts stated in it		
23	are true.		
24			
25	DATE (ATEKA SANFORD)		

Page 30 1 CERTIFICATE OF OATH 2 STATE OF FLORIDA 3 COUNTY OF PINELLAS I, the undersigned authority, certify that 4 5 ATEKA SANFORD personally appeared before me and was duly 6 sworn on April 9, 2024. 7 Witness my hand and official seal this 6th day of January, 2025. 8 9 10 KITTRELL KIMBERLY G. 11 Notary Public, State of Florida Commission No.: HH 99385 12 Expiration Date: 3/20/25 13 14 15 16 17 18 19 20 21 22 23 24 25

1	REPORTER'S DEPOSITION CERTIFICATE
2	STATE OF FLORIDA
3	COUNTY OF PINELLAS
4	I, Kimberly L. Renfroe, Registered Professional
5	Reporter, certify that I was authorized to and did
6	transcribe the electronically recorded virtual
7	deposition of ATEKA SANFORD; that a review of the
8	transcript was requested; and that the transcript is a
9	true and complete record as I understood it to be.
10	I further certify that I am not a relative,
11	employee, attorney, or counsel of any of the parties,
12	nor am I a relative or employee of any of the parties'
13	attorney or counsel connected with this action, nor am I
14	financially interested in the action.
15	Dated this 6th day of January, 2025.
16	
17	Andrew & Redone
18	KIMBERLY L. RENFROE, RPR
19	Registered Professional Reporter
20	
21	
22	
23	(Transcript ordered by Jeanette Bellon, Esquire, on
24	December 10, 2024.)
25	

Page 32 January 6, 2025 1 3 Forensic Specialist Ateka Sanford Asanford@pcsonet.com 4 5 Dear Specialist Sanford, Your electronically recorded deposition taken in 6 7 the case of State of Florida versus Tomasz Kosowski on 8 April 9, 2024, has been transcribed. Per your request to review the transcript, it is being held at our office at 728 South New York Avenue, Lakeland, Florida until 10 11 February 10, 2025. 12 Please call 863-500-3603 to make arrangements to do 13 this during our regular business hours of 8:30 a.m. to 14 5:00 p.m. 15 Thank you for your prompt attention to this matter. 16 Sincerely, 17 18 19 Kimberly L. Renfroe, RPR 20 21 2.2 23 24 25