

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

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO. 23-02935-CF

TOMASZ KOSOWSKI,

Defendant.

_____/

VIRTUAL DEPOSITION OF DETECTIVE JOHN SINNI

DATE: March 5, 2024

TIME: 9:13 a.m.

PLACE: Virtually through Zoom Conferencing

APPEARANCES: NATHAN VONDERHEIDE, ESQUIRE
ALEXANDRA G. SPADARO, ESQUIRE
Assistant State Attorneys
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Clearwater, Florida 33762-0500
For the State

BJORN BRUNVAND, ESQUIRE
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COURT REPORTER: Leslie W. Renfroe

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I-N-D-E-X

March 5, 2024

DETECTIVE JOHN SINNI

Direct Examination by Ms. Ramos Wicks.....3

ERRATA SHEET.....61

WITNESS AFFIRMATION.....62

CERTIFICATE OF OATH.....63

TRANSCRIPTION CERTIFICATE.....64

CERTIFIED COPY

1 DEPOSITION IN DISCOVERY

2 DETECTIVE JOHN SINNI

3 Pursuant to notice duly given, the virtual
4 deposition of DETECTIVE JOHN SINNI, called by the
5 Defendant in the above-styled cause, was taken by the
6 court reporter and transcribed.

7 THE REPORTER: Sir, If you could raise your
8 right hand, please.

9 Do you solemnly swear the testimony you are
10 about to give will be the truth, so help you God?

11 THE WITNESS: I do.

12 THE REPORTER: Thank you.

13 DETECTIVE JOHN SINNI, having been first duly sworn,
14 upon interrogation in discovery, testified as follows:

15 DIRECT EXAMINATION

16 BY MS. RAMOS WICKS:

17 Q. Good morning, Detective Sinni.

18 A. Good morning.

19 Q. My name is Willengy Ramos Wicks. I am an
20 associate attorney at Brunvand Wise, P.A. Along with
21 myself is also my partner, Bjorn Brunvand. He is the
22 lead attorney on this case. And also the State
23 Attorney, Nathan Vonderheide, and then our awesome court
24 reporter, Mr. Renfro. Okay?

25 A. Yes.

1 Q. All right. So can you please state your name
2 and spell your last name for the record?

3 A. Yep. My name is Detective John Sinni,
4 S-i-n-n-i.

5 Q. All right. And Detective Sinni, where do you
6 work?

7 A. I work for the Largo Police Department.

8 Q. How long have you worked for Largo Police
9 Department?

10 A. Twenty-one years currently.

11 Q. All right. And during your 21-year tenure
12 with the Largo Police Department, what positions have
13 you held?

14 A. I was obviously just a police patrol officer,
15 FTO, K9 handler, property crimes detective. That's
16 pretty much it.

17 Q. All right. And do you have any law
18 enforcement experience prior to Largo PD, or was Largo
19 PD, like, your first job?

20 A. No. I worked for three years for the Pinellas
21 County Sheriff's Office prior to that. And then I had a
22 brief stint back in the Marine Corps in the '80s and
23 '90s as an MP.

24 Q. Okay. As far as your term with Pinellas
25 County Sheriff's Office, what position did you work in

1 those three years?

2 A. I worked as a detention and corrections deputy
3 at the Pinellas County Jail.

4 Q. Okay. Thank you.

5 A. Yes.

6 Q. Oh. Detective Sinni, did you write a report
7 or a supplemental report connected to this case?

8 A. I wrote several, yes.

9 Q. Okay. And have you had a chance to review
10 those supplemental reports prior to this deposition this
11 morning?

12 A. I did.

13 Q. Are there any changes, such as additions or
14 corrections, that need to be made to your report?

15 A. No. Not to my knowledge, no.

16 Q. All right. And as we sit here on today's date
17 of March 5th of 2024, are your reports full and
18 complete?

19 A. Yes.

20 Q. So you don't have anything that you need to
21 add as far as, like, a supplement?

22 A. Nothing outstanding, no.

23 Q. All right. So how did you become involved in
24 this case?

25 A. So essentially, I showed up to work on that

1 first morning of March 22nd last year, 2023, and as I
2 came in, one of my partners, Detective Wagner, informed
3 me that the -- the other side of a house, meaning our
4 crimes against persons detectives were working on,
5 potentially, a missing persons case. And that's kind of
6 how I got notified of the whole thing.

7 Q. All right. And so when you became notified
8 that the detectives were working on a missing persons
9 case, did you receive any particular information as far
10 as who was involved or any other details?

11 A. Just that it involved a location off of
12 Belcher Road. And then after having spoken with
13 Detective Hunt shortly thereafter, he -- he kind of
14 described that -- the incident as being a law office had
15 an attorney that appeared to have gone missing. And
16 that in reviewing some -- the video surveillance there,
17 he found what he believed to be was a PSTA bus traveling
18 by about the same time as the incident they were looking
19 into.

20 Q. Understood. So did you respond to the law
21 office --

22 A. No.

23 Q. -- at all?

24 A. No. Nope.

25 Q. Okay. So you didn't go to the law office off

1 of Belcher. What was the first step that you took,
2 then, as far as the investigation when you learned about
3 this PSTA surveillance video?

4 A. So -- so Detective Hunt said -- had already
5 informed me that he had reached out to PSTA, and he
6 spoke with a gentleman out there regarding getting a
7 copy of the video from that bus. And so that was
8 already in the works. So I reached out to that person
9 by phone to confirm that that had already been done, and
10 at which point I reached out to Officer Russell to
11 respond out there and collect that -- that video.

12 (Alexandra G. Spadaro joined the deposition)

13 Q. All right. And so were you able to collect
14 the video with -- from Officer Russell?

15 A. Yes.

16 Q. All right. And did you have the opportunity
17 to review the video?

18 A. Yes. I reviewed that video, along with a
19 couple other detectives here in the office.

20 Q. All right. And so upon reviewing that video,
21 what did you do? What was the next step that you took
22 in your investigation?

23 A. So we just reviewed it and observed what they
24 had previously described, that a gray-colored Toyota --
25 what appeared to be a gray-colored Toyota pickup truck

1 in the video. It was my understanding that they had
2 seen it on the video. And having looked at the video
3 briefly from the surveillance footage that they had seen
4 -- they had obtained, it appeared that the vehicle, as
5 the bus was passing by the law office, was -- was parked
6 in the same vicinity as the video in the other -- or the
7 truck in the other video. So it appeared that it did
8 capture the vehicle that was on the site there and what
9 appeared to be a person standing outside the vehicle at
10 the time.

11 Q. All right. And what else -- was there
12 anything else of value that you noted from the video
13 surveillance?

14 A. Yes. As it continued -- as the PSTA bus
15 continued northbound on Belcher Road, it appeared --
16 eventually the vehicle that -- in question had left the
17 business traveling northbound. According to the
18 surveillance footage from the law office, it appeared it
19 had left going northbound on Belcher. And then when we
20 later reviewed all the video footage from the PSTA bus,
21 it did appear as the bus was getting up near Gulf to Bay
22 and Belcher Road, that that vehicle does appear to catch
23 up with the PSTA bus, which captured additional footage
24 of the truck.

25 Q. All right. And so as far as the additional

1 footage is concerned, was there anything that you
2 identified as, like, you know, an item of value or
3 something of evidentiary value from reviewing that
4 additional footage of the truck?

5 A. Yeah. So in the bed of the truck, as it
6 passes on by on the video feed, it appeared to be what
7 looked like a -- described as a Gorilla cart. It's a
8 collapsible cart/wagon type of thing. And within that
9 cart, it appeared to be some -- it appeared to be full
10 and what appeared to be a -- like, a red blanket or
11 covering over the top of whatever was inside.

12 Q. All right. And so upon, you know, coming
13 across this information, what did you do with it? What
14 was the next step that you took in your investigation?

15 A. Well, you know, at this point, we -- you know,
16 we determined that the vehicle was traveling north on
17 Belcher Road. And at the point that we got further
18 north, the truck continues out of site of the PSTA bus.
19 And, of course, with the PSTA bus making consecutive
20 stops along its path, there was no way that it was going
21 to catch up.

22 So a couple of the officers -- myself, Detective
23 Wedin and Detective Wagner got together and determined
24 the proper course of action would be to attempt to
25 continue northbound and stopping at local businesses to

1 see if they had any surveillance footage of that vehicle
2 continuing northbound and see how far we could get with
3 that.

4 Q. All right. So did you respond to any
5 businesses along that route?

6 A. I did. I did. Along the -- along the way, I
7 had stopped at multiple businesses and checked
8 surveillance footage cameras. And at multiple
9 businesses, I was able to find the vehicle continuing
10 northbound, ultimately ending up in it passing -- I
11 think the last one we caught that day was Sutherland
12 Elementary School up in Palm Harbor, I believe.

13 Q. Did you do any investigation as far as, you
14 know, lot cameras or license plate readers to try to get
15 that?

16 A. Yes. So I initially attempted to do that with
17 the vehicle and -- because there are cameras located at
18 that intersection up there, and I was hoping to obtain a
19 license plate initially of that vehicle. However, when
20 we did eventually find footage of the vehicle at the
21 intersection, images of it, it appears that the vehicle
22 was actually -- that same PSTA bus that was -- provided
23 the video footage, was blocking the camera's view of
24 obtaining the license plate on the vehicle at that time.

25 Q. So you mentioned Sutherland Elementary was the

1 last, you know, business or, you know, school in the
2 area that you checked as far as along the route
3 from -- that you determined the Toyota Tundra was
4 taking, right?

5 A. Yes, ma'am. I believe that was Detective
6 Allred that located that video in particular.

7 Q. Okay. So as far as businesses that you
8 actually went to, I see in your report that you
9 responded to Clearwater Toyota.

10 A. Oh, yeah. So yeah, prior to do this, I did
11 re -- I did run up to Clearwater Toyota. Essentially,
12 we had pretty good images of the vehicle. I'm not a
13 Toyota person, and so there were unique identifiers on
14 the vehicle that I thought might be beneficial to stop
15 by and meet with a member of the management there to
16 help us kind of narrow down specifically what we're
17 looking for.

18 Because my initial searches through -- like I said,
19 through the LPRs, there is a lot of gray Toyota Tundras
20 in Pinellas County, as you could imagine. But this one
21 had some unique characteristics that I thought maybe
22 would be helpful if we could kind of narrow it down.

23 Q. And what were those unique characteristics
24 that you wanted to ask management about?

25 A. Well, so the -- the thing that I found that

1 was not very common amongst Toyota Tundras, while I'm
2 searching them through the system, is the tail -- one of
3 the things was the taillights on this specific model.
4 Usually the taillights are -- they are horizontal. And
5 most of the Toyota Tundras in Pinellas County had the
6 reverse lens. So the taillight lens is red, the reverse
7 light lens is clear; it's white; it's, like, opaque.
8 And so usually that was located on the bottom of the
9 lens. On this particular truck, that -- that reverse
10 light lens was located in the center of the taillight,
11 which was unusual.

12 Q. And that was determined from the review of the
13 surveillance footage?

14 A. Yes. Yes.

15 Q. All right. And so were you able to get
16 information from management at Clearwater Toyota as far
17 as, you know, the positioning of this particular light
18 or lights?

19 A. Yeah. After they reviewed the -- the footage
20 that I was -- the images that I was able to show them,
21 the manager up there -- I'm looking at the thing now;
22 his name was Brent Tansy -- was able to confirm. He
23 narrowed it down to be between 2015 and a 2021 Toyota
24 Tundra TRD Pro specifically.

25 Q. All right.

1 MS. RAMOS WICKS: Sorry about that. It's my
2 dog. Hold on a second.

3 (Off-the-record discussions were held)

4 MR. VONDERHEIDE: If we record, the witness
5 has got agree with it.

6 MS. RAMOS WICKS: Right. Do you consent to
7 being recorded, Detective Sinni?

8 THE WITNESS: That's fine with me.

9 Q. (By Ms. Ramos Wicks) All right. I apologize
10 for that. So back to where we were. Right. So we were
11 talking about -- in your conversation with the sales
12 manager, Mr. Tansy, at Clearwater Toyota, so once you
13 determined that feature, you know, of this truck that
14 you were just speaking about, was unique to this
15 particular truck within a certain, you know, range of
16 model years, I do see that you responded to Cox Heating
17 and Air Conditioning as far as, you know, tracking
18 surveillance footage on Belcher. Is that correct?

19 A. That's correct. I believe that was the first
20 stop that I made, yes.

21 Q. All right. Were you able to obtain
22 surveillance footage from this particular business?

23 A. So I was able to review the footage; however,
24 the manager on the scene at that moment did not seem
25 completely like he understood how to obtain it. So

1 essentially, I reviewed it, saw the vehicle in question
2 continuing northbound, and made arrangements with the
3 manager of Cox Heating and Air, Mr. Zach Moskowitz --
4 he's the president -- to come back at a later time and
5 obtain that video footage.

6 Q. All right. And did you come back at a later
7 time to collect the footage or did somebody else?

8 A. I did not. Circumstances being what they
9 were, I believe -- don't quote me on this, but "I
10 believe Detective Allred that obtained it" and took care
11 of that.

12 Q. All right. And I also see that you went to
13 the Valero gas station at Sunset Point in Belcher.

14 A. I did. I did.

15 Q. And did you obtain any surveillance footage
16 from this particular business?

17 A. So looking at that video footage, it appeared
18 that the truck also continued past that one. That
19 footage -- the system was very antiquated, and it was
20 difficult to work with. While I was there, I obtained
21 information from Detective Wagner -- who was pretty much
22 essentially right across the street -- that he had good
23 footage all -- of the same thing that I was reviewing.
24 So the -- the attempt was made to go -- or was going to
25 be an attempt to go back later. And I don't recall who

1 it was that was tasked with going back and trying to
2 recover that later, but I believe that was not
3 recovered. I think that video was gone.

4 Q. All right. Thank you. And then I also see
5 that you responded to Chick-fil-A located at
6 2525 Countryside Boulevard.

7 A. I did.

8 Q. All right. I see that you note in your report
9 that the surveillance footage that you reviewed, you
10 didn't see the vehicle pass by this particular business.

11 A. That's correct. As you go north on Belcher
12 Road, it -- the roadway splits. You can either go down
13 Countryside or continue to go up Belcher. And so
14 we -- I don't recall who went where, but I know I chose
15 to go checking Countryside. And one of the first
16 businesses that you come to, that direction, was
17 Chick-fil-A. And their video footage was crystal clear,
18 and it was apparent that it did not go that way.

19 Q. And so then I see that the next, you know,
20 business that you went to was the Sutherland Elementary
21 School on -- at 3150 Belcher Road in Palm Harbor.

22 A. Yes. I was contacted by Detective Allred, who
23 was up there. He essentially said that he believed he
24 found the vehicle on -- on surveillance up there. So I
25 responded up there to review the video footage that he

1 had seen. And once we saw it, it did appear to be the
2 vehicle. And kind of sitting down, doing the math of
3 time of travel and stuff, it did seem reasonable that
4 that could have been the same vehicle in question.

5 Q. All right. And so did you respond to any
6 other businesses in an attempt to track video
7 surveillance along Belcher on this particular day?

8 A. I don't recall having gone to other
9 businesses. We did look for additional, like,
10 residential -- as you get up that way, you kind of lose
11 businesses. It becomes more residential. And there are
12 other units -- or other units -- other detectives had
13 made it as far as, I believe it was Klaus Herman Road
14 maybe, up there. And we kind of, like -- I forget the
15 name of the business, but we all kind of converged and
16 stopped and tried to figure out, okay, what's next.

17 Q. Right. Okay. And -- and during, you know,
18 your involvement in the investigation, I do see that you
19 note in your report that you're receiving information
20 from other detectives, you know, that are conducting,
21 you know, their portions of the investigation.

22 A. That's correct.

23 Q. Okay. So you're receiving this information,
24 you know, secondhand from other detectives, right?

25 A. Correct.

1 Q. Okay. I do see that there was some
2 information about a Flock camera hit in Tarpon Springs?

3 A. Yes. So I believe that was Detective Gay had
4 passed along information that -- I think based on us
5 continuing to work northbound like that following it,
6 she -- she did additional research and was able to
7 discover an image of the truck -- the truck up in Tarpon
8 Springs, correct.

9 Q. All right. Now you note in your report that
10 you responded to conduct surveillance of Ms. -- of
11 Kosowski's neighborhood; that's how you phrase it in
12 your report.

13 Can you tell me about that?

14 A. Yeah. So while we had gotten up to that
15 business when we were kind of brainstorming about, okay,
16 where do we go next with this, I don't recall who;
17 someone had mentioned, that had been at the law office
18 during that portion of that, that there was some mention
19 of a conflict that the victim had had with Mr. Kosowski
20 at some point. And I don't know all the details. And
21 then kind of the -- the thought process is, like,
22 discovered, well, Mr. Kosowski resides in Tarpon
23 Springs, and at this point, we're now in Tarpon Springs,
24 and that was kind of interesting. And so, like, where
25 do we go next.

1 And while they were -- we were all having this
2 discussion, I opted to go down, and -- and it was
3 discussed that I was going to go down into the
4 neighborhood where Mr. Kosowski resides and just kind of
5 park and surveil the neighborhood --

6 Q. Okay.

7 A. -- until -- until what -- they decided what
8 else -- what the next step was going to be, essentially.

9 Q. All right. And so where did you park when you
10 arrived in the neighborhood?

11 A. I -- I parked on Seaside Drive adjacent to the
12 residence located -- located at 1700 Grand Central
13 Drive.

14 Q. All right. And the address that was
15 determined to be Kosowski's address was 511 Seaview
16 Drive in Tarpon Springs?

17 A. I believe so, yes.

18 Q. All right. So you essentially determined that
19 you would go conduct the surveillance on your own,
20 right?

21 A. Yeah. So as they were -- as we were all kind
22 of sitting around brainstorming, I didn't -- we didn't
23 know where this was going to go that evening. And so in
24 the meantime, I said, "Well, in case we're going to go
25 further with this video surveillance, let me go ahead

1 and try and get visual of the neighborhood." And
2 Mr. Kosowski's home is on a dead-end street. And this
3 intersection where I had chose to park is the first
4 intersection as you leave his home. So if the -- any
5 vehicle was going to come and go from his home, past, it
6 would have had to gone past that intersection. So
7 that's why I chose that intersection specifically.

8 Q. And so what was the intention behind doing the
9 surveillance; just to monitor traffic coming in and out
10 of the --

11 A. Yeah. Looking -- looking for that Toyota
12 truck. I didn't -- mainly, and to see if I could see it
13 come or go.

14 Q. All right. And so were there any other
15 detectives in the area conducting surveillance?

16 A. I was alone with -- with my vehicle. I
17 believe some other detectives were out and about
18 somewhere nearby. I -- I don't really know
19 specifically.

20 Q. All right. And so as you conducted your
21 surveillance, what -- what did you do specifically?

22 A. So I know at one point I was -- I forget who,
23 but somebody wanted to get a copy of -- they wanted to
24 put together a photopack to show to a witness; I believe
25 it was back at the law office. But because I had time

1 and I was sitting parked, I -- I went ahead and created
2 a photopack as I was sitting at that location. And I
3 ended up printing that back at our office for someone --
4 I believe that was Detective Gay -- to pick up and --
5 and she was going to show it to a witness.

6 Q. All right. So then that, to me, right -- and
7 you can correct me if I'm wrong -- that means that at
8 some point you did leave the area that you were at 1700
9 Grand Central Drive to print out this photopack?

10 A. No. I did it mobiley (sic). I did it from my
11 laptop in my car.

12 Q. All right. So you printed out from your
13 laptop in your car?

14 A. Yes.

15 Q. Okay. And so --

16 A. So -- so just to clarify. Sorry. I'm --
17 because I'm confusing you. So if I'm in my laptop, even
18 right now, I'm not -- I'm not at my desk, but if I
19 print, I can print it; it goes -- I don't -- I'm not a
20 wizard when it comes to tech, either, so -- but I can
21 print it to my printer in my office from wherever.

22 Q. Okay. Great. I just wanted to know, you
23 know, if you left physically to go do that or if you
24 stayed --

25 A. No, ma'am. No, ma'am.

1 Q. -- just for clarifying. I appreciate it.

2 A. No. You're welcome. You're welcome.

3 Q. You stayed in your vehicle at 1700 Grand
4 Central Drive and printed out this photopack from your
5 laptop, even, to your office over at Largo PD, right?

6 A. Correct.

7 Q. And so how long did you remain in the area of
8 1700 Grand Central Drive?

9 A. I remained there until -- to be honest with
10 you, I don't recall the time. At some point, somebody
11 made the decision that we were going to wrap up our
12 surveillance for the evening. And I can't tell you
13 honestly what time that was.

14 Q. All right. At any point while you were
15 conducting surveillance in the area of -- I want to make
16 sure I get this address right -- 1700 Grand Central
17 Drive, did you go to 511 Seaview Drive?

18 A. No.

19 Q. Why not?

20 A. It just wasn't something I was -- like --
21 and -- and I didn't want to go down there and -- and
22 risk maybe being noticed or whatever. You know, we
23 weren't a hundred percent sure. Right now, this, in my
24 mind, was just precautionary in the event that it does
25 go back to that neighborhood. But, you know, I didn't

1 know what else was being discussed at that time by
2 everyone else. So I was just sitting stationary.

3 Q. All right. And so at any time during, you
4 know, this time when you're sitting stationary in your
5 vehicle, did you have the occasion to search
6 511 Seaview, like, the backyard area or, you know, the
7 front area, like the property, the driveway --

8 A. No.

9 Q. -- for photographs at all?

10 A. No. That evening, I never -- I never went
11 down that street, so...

12 Q. All right. Did you witness anyone else take
13 photographs of the property?

14 A. No. No. I was -- again, I was parked
15 stationary there.

16 Q. All right. Did you look into the garage?

17 A. No.

18 Q. You already -- yeah. Okay. As far as the
19 photopack was concerned, I mean, did -- did you receive
20 any information other than what you just testified to
21 about why this photopack was necessary?

22 A. I just recall it being a witness. And
23 I -- and again, I -- I can't say a witness from where
24 for sure, but I recall that they were going to --
25 Detective Gay was supposed to take that photopack and go

1 show it to a -- I believe a female witness. I -- I
2 don't know anything about that.

3 Q. Okay. And do you recall the name of the
4 female witness at all?

5 A. I don't. Sorry.

6 Q. Okay. To your knowledge, was a photopack
7 administered to a witness named Debra Heinrichs
8 (phonetic) at all?

9 A. That doesn't -- name doesn't ring a bell.
10 Again, I didn't have any interaction with any of the
11 people down at that location, so I don't really know.

12 Q. All right. Thank you.

13 A. You're welcome.

14 Q. So moving on to, you know, further involvement
15 that you document in this case in your reports, the next
16 day -- so the involvement that was documented -- just so
17 that the record is clear -- that we just went through,
18 was on 3/22 of 2023. Does that sound accurate?

19 A. I'm sorry. Bear with me. Yes, that was
20 correct.

21 Q. Absolutely no problem. I had it scrolled as
22 well on the report. So then going to your involvement
23 on 3/23 of 2023, what was -- like, how did you assist in
24 the investigation?

25 A. So at this point, I think we kind of got

1 together and discussed that it would be prudent
2 to -- because the area of Tarpon Springs up there
3 becomes all residential and there is very limited -- as
4 you kind of go from where we had stopped on the previous
5 day up to where Mr. Kosowski resides, it's all
6 residential and very limited on video surveillance
7 footage.

8 So again, just to whether -- rule in or rule out
9 whether we were on the right track at that point in
10 time, the decision had been made to kind of -- kind of
11 skip the few miles in between and just go straight to
12 the neighborhood and see if we could have any success
13 finding that same vehicle coming down that limited
14 residential street in that neighborhood.

15 So yeah, I believe several of us responded up to
16 that area and looking for potential video surveillance
17 footage.

18 Q. All right. And were you able to locate any
19 video surveillance footage in the area?

20 A. Yes. I ended up locating -- it looks like
21 1704 Grand Central Drive. The gentleman that resides
22 there had obvious video cameras on the front of his
23 home. And so when I reached out to him, he was
24 agreeable to allow me to review the system.

25 His system was quite a challenge. It was a little

1 antiquated. And -- and -- and every time it -- it had
2 some issues. And so every time it would freeze up, it
3 would kind of reset the system, which was making it more
4 challenging.

5 But eventually, yes. The system was off by -- I
6 can't recall -- I think it was a -- a total of, like, 48
7 hours, it looks like. And so, basically, if you just
8 went back in time from the time stamp 48 hours back, I
9 eventually found what I was looking for. And it was
10 that same vehicle with the same cargo traveling past,
11 heading towards Mr. Kosowski's residence.

12 Q. All right. Did you search for any other
13 additional footage?

14 A. I did. And I didn't have any additional -- I
15 didn't find anything, really, additional. At some
16 point, though, Detective Compton ended up notifying us
17 that he ended up finding video surveillance footage at a
18 residence located at 503 Seaview Drive, which is right
19 next door to Mr. Kosowski's home. So at that point, we
20 kind of concluded that we were on the right track, you
21 know, and -- at least in my mind.

22 Q. So at this point, then, I do see in your
23 report that a search warrant was obtained. Did you have
24 any direct involvement in obtaining the search warrant?

25 A. I did not.

1 Q. Okay. And the search warrant specifically was
2 for 511 Seaview Drive?

3 A. I believe so. I would hope so.

4 Q. Did -- so what was your involvement as far as
5 executing the search warrant? Were you physically
6 present during the execution of the search warrant?

7 A. I was physically present. However, we were
8 under direct supervision of the State. And I don't
9 recall her name, but she was very on top of things,
10 directing us not to touch a thing. So we just kind of
11 oversaw. Tarpon Springs Police Department was brought
12 in, and their detectives were the ones involved doing
13 the search of the residence under our observations.

14 Q. Okay. So what time did you arrive at
15 511 Seaview on March 23rd?

16 A. I was there most of the day from the time we
17 got there that day earlier on. I don't know that I know
18 exactly what time it was, but it was -- it was daylight,
19 and I was there most of the -- most of the day in that
20 neighborhood.

21 Q. All right. What time did you leave the
22 neighborhood?

23 A. It was really late. I don't recall what time
24 it was. It was -- it was probably midnight or later.
25 I -- I don't know.

1 Q. All right. And in the moments leading up to
2 the search warrant, right -- you said you were there all
3 day as far as being in the area of 511 Seaview. What
4 did you do in those hours leading up to when the search
5 warrant was actually executed?

6 A. We just stood by. We just stood by waiting.
7 At one point, I returned to the Largo Police Department
8 and picked up our mobile command bus think -- you know,
9 obviously thinking that this is going to be a late night
10 chore and that officers would want a place to rest and
11 reprieve and get away -- you know, get out of the
12 weather and -- and get some cool air.

13 So I went back to the Largo Police Department with
14 my supervisor, Sergeant Carvella, and I picked up the
15 command bus, mobile command vehicle and brought it back
16 to the scene.

17 Q. All right. Thank you. And so during the time
18 that you were essentially standing by, did you search
19 the property outside of 511 Seaview at all, like the
20 driveway or the front, you know, area or the backyard
21 area?

22 A. I mean, we had visual on the front the whole
23 time. We were all essentially standing in the roadway
24 in the front yard -- you know, I'm sure you've been to
25 the house or at least know what it looks like. We were

1 on the -- standing on the bend of the corner on
2 the -- for the most -- most of the whole evening, so...

3 Q. All right. Did you look into the garage at
4 all during the execution of the search warrant?

5 A. No. There is -- no. There is no way to look
6 into the garage.

7 Q. Okay. Was the garage open prior to the search
8 warrant being read at the scene?

9 A. No.

10 Q. Okay. Did you personally take any
11 photographs?

12 A. No.

13 Q. Okay. Did anyone else?

14 A. Not that I'm aware of.

15 Q. During the execution of the search warrant and
16 prior to the search warrant being executed, were you
17 wearing a body camera?

18 A. No.

19 Q. Did -- you -- you mentioned that it was Tarpon
20 Springs that was doing the actual searching; you
21 were -- you were instructed not to touch anything. Did
22 you do any searching inside of 511 Seaview as far as
23 walking the property or anything like that?

24 A. Did I go inside? Is that what you're asking
25 me?

1 Q. Right. Did you go inside. Yes. Did you go
2 inside?

3 A. Yes.

4 Q. Okay. Did you assist with any searching as
5 far as, you know, directing anybody, you know, to search
6 any particular area in the property?

7 A. So I was overseeing -- and I don't recall the
8 name of the detectives that I was kind of observing, but
9 they were doing the thorough search on -- on -- mostly
10 in the garage is what I was -- where I was. And as they
11 were going through, they would kind of look for me
12 for -- okay -- and I would kind of dir -- at the time,
13 when they were going through stuff, if I saw something I
14 thought may be relevant, I would ask the forensics
15 technicians to photograph. And -- and again, trying to
16 make sure that I'm observing the detectives that are
17 going through all the stuff, make sure they are going
18 through everything of relevance.

19 And, then, if I remember correctly, the only thing
20 that -- visually that I noticed that was -- that we took
21 was there was a stack of license plates. And we had
22 already determined that there was some -- some odd
23 behavior with some of the license plates affiliated with
24 that vehicle that belong -- that had a couple different
25 tags on it that were assigned to different deceased

1 folks. So when we saw the license plates in the garage,
2 we elected to seize those.

3 Q. All right. And besides the license plates,
4 did you find any -- or identify anything of evidentiary
5 value?

6 A. So prior to leaving that evening, I asked the
7 forensics folks if they wouldn't mind -- and -- and I
8 don't remember why I thought to ask this, but I -- but I
9 asked them to try and utilize luminol, or whatever, the
10 chemical substance that they use for -- for identifying
11 blood evidence, you know, under -- under different
12 lighting conditions. I asked them to check the floor of
13 the garage for us. And they did. And when they did
14 that, they found what appeared to be evidence of blood
15 on the floor of the garage.

16 Q. And was this evidence documented?

17 A. It was. The forensic -- I -- and again, you'd
18 have to refer to all the forensics on that for their
19 documentation of everything. But yes, I mean, it
20 was -- it appeared to have been documented properly by
21 them, as far as I could tell.

22 Q. All right. And your -- in your report, you
23 also noted that besides the license plates, that you
24 observed a collapsible Gorilla cart.

25 A. There was. There is a collapsible Gorilla

1 cart, which appeared to be similar in design as the
2 what -- the one that was observed in the back of the
3 pickup truck. However, based on the coloring of the one
4 that we saw in the truck, this one had a different
5 appearance. It had -- so if you go online and
6 Gorilla -- Google collapsible Gorilla carts, there are
7 all different model -- colors. They have different
8 color options. And this one was different in color than
9 what that one appeared to be in the truck.

10 Q. And so what -- what did the one -- the Gorilla
11 cart that you observed in the truck on the surveillance
12 video, what -- what was the coloring on that -- on that
13 cart?

14 A. So it appeared to be black with like -- black
15 with like a gray canvas of some sort. And then the one
16 in the garage had what -- like a yellow handle on it.
17 And that would have been obviously note -- noticeable in
18 the -- in the video. And so we determined it wasn't the
19 same one.

20 Q. All right. I wanted to talk about the license
21 plates just for a brief moment. You mentioned, you
22 know, that there was some odd behavior about the license
23 plates. Can you elaborate on that? How did you
24 determine, you know, that the license plates were going
25 to be a significant issue in this case?

1 A. So again, it was Detective Gay that found the
2 Flock camera hit of the vehicle up in Tarpon Springs.
3 And that camera, I believe it was, it was actually
4 noticed and identified a license plate. And that
5 license plate, when you ran it, it came back to a woman
6 who had been deceased for quite some time. And I did
7 recall, I did reach out to a family member -- I believe
8 it was her son -- and tried to narrow down. And
9 essentially, I didn't get anywhere with that. The son
10 knew that several years prior, his mom had moved to
11 Florida. And I believe that she had a Lexus or
12 something at that time, and she, soon after moving to
13 Florida, traded that vehicle in and got everything
14 switched over to Florida. And that tag was an
15 out-of-state tag. I don't recall where from. So he
16 doesn't know how her tag came to be on that vehicle,
17 so...

18 Q. And as far as the vehicle is concerned and
19 what -- I'm talking about the Toyota Tundra so that you
20 know what I'm referring to -- was there, like, was that
21 vehicle located at 511 Seaview Drive during the search?

22 A. Yeah. So whenever the search warrant
23 was -- began, the -- the garage door was eventually
24 opened up. And a Toyota Tundra matching exactly what we
25 were looking for with the same taillights -- and I think

1 I forgot to mention earlier there was a distinct red
2 lettering for the tailgate and the grille of the truck
3 for the Toyota Tundra that was really unique in that
4 Toyota doesn't do that. I was able to confirm that
5 through the investigation -- that Toyota doesn't put out
6 a vehicle with red lettering like that. And it would
7 have been an aftermarket add-on by someone. And so all
8 the details that we had been looking for previously,
9 that truck appeared to match that.

10 So when they opened the garage door, I was able to
11 see the tag and -- and run that. And that one, too,
12 came back to someone who is deceased when -- when you
13 ran the tag. So yeah.

14 Q. All right. And did you run any other
15 information from the vehicle besides the tag number?

16 A. Yeah. We ended up -- someone who was in -- at
17 this -- at this point, I'm still outside. I haven't
18 gone into the residence at all. And someone inside, I
19 believe it might have been Detective Volton; I'm not a
20 hundred percent sure -- provided me with the -- the VIN
21 off of the door, inside the door jamb of the vehicle.
22 And in running that, I was able to identify who the --
23 the last known an owner in -- in DAVID, which is our
24 licensing and registration database, and that was
25 identified as a Mr. Mark Otto.

1 Q. All right. And so did you note or have any
2 information, you know, to lead you to believe that the
3 Tundra was at 511 Seaview prior to the execution of the
4 search warrant?

5 A. That it was at the -- at the residence?

6 Q. Yes.

7 A. Only that it was seen on the video
8 surveillance driving down that street and we never saw
9 it leave.

10 Q. So that was the only information you had?

11 A. That's all I had, yeah.

12 Q. All right. And did -- did anyone at Largo
13 Police Department or any law enforcement personnel know
14 that Dr. Kosowski owned a Tundra, a Toyota Tundra prior
15 to finding the truck that night at 511 Seaview and
16 subsequently running the VIN?

17 A. Not that I'm aware of.

18 Q. So when you ordered -- when -- when you asked
19 PCSO forensics to process the garage floor with luminol,
20 were they initially not going to do it?

21 A. It didn't seem like it. It was kind of like
22 an afterthought by me. It -- it didn't -- I don't think
23 they were. I can't speak for them. You're going to
24 have to ask them that for sure.

25 Q. Okay. You mentioned in your report that the

1 luminol showed a trail of blood from the north bay
2 garage to the south bay garage; is that correct?

3 A. Yes, ma'am.

4 Q. Was this the reason that the Toyota Corolla,
5 different vehicle, became a vehicle of interest in this
6 investigation?

7 A. So -- yeah. So there was -- I don't recall.
8 Someone had found video which appeared -- and it may
9 have been the -- the next-door neighbor's camera -- that
10 Detective Compton was with -- that caught the -- what
11 appeared to be the red Corolla. Which at some point we
12 had discovered that was a registered vehicle to
13 Mr. Kosowski.

14 So the truck shows up at the residence and then
15 never seems to leave. But then that red Corolla does
16 appear to leave hours later. And I don't remember the
17 exact time span for that either.

18 Q. So was the -- did the -- so was -- the blood
19 trail that you noted in your report, was this listed as
20 probable cause for the Toyota Corolla search warrant
21 that was eventually obtained in this case?

22 A. I had nothing to do with any of the search
23 warrants, so I couldn't tell you that, if it was listed
24 on there or not.

25 Q. All right. And also, as it relates to the

1 search warrant -- and, you know, I'll move on to
2 something else -- you indicated in the beginning when we
3 discussed about another agency, was the agency that
4 actually conducted the search warrant, and that was
5 Tarpon Springs Police Department.

6 Did Lieutenant Lamonico from Tarpon Springs
7 provide you with any instructions for searching the
8 premises?

9 A. So Detective Lamonico works for Largo -- or
10 worked for Largo Police Department. She's retired. So
11 all I know is that that evening, I was kind of
12 assigned -- I don't even know if that's a good
13 word -- but I was kind of there to oversee the
14 detectives that were working in the garage, that were
15 in -- searching the garage at that moment.

16 Q. Okay. Thank you for correcting me too.

17 A. No, no. You're good.

18 Q. Did anyone else, you know, either from Largo
19 PD or from Tarpon Springs Police provide you with any
20 instructions for searching the premises?

21 A. The State -- I don't remember; forgive me. I
22 don't remember her name. But she was the one basically
23 making sure that -- telling me not to touch anything.
24 I'm like, "Okay."

25 Q. All right. Okay. So once, you know, your

1 involvement in this execution of the search warrant was
2 over, what was the next step that you took in your
3 investigation?

4 A. That pretty much wrapped up the evening. I
5 know I did go back upstairs into the residence where
6 they were -- there were -- like, Lieutenant Lamonico,
7 and there were other detectives up there and -- and
8 people from Tarpon Springs that were working the part of
9 the search warrant through the rest of the house. And I
10 know I -- I know I did go up there briefly, but I didn't
11 really have any part to play with that search up there.
12 So that was pretty much the end of my evening.

13 Q. Okay. And -- and so when you went up there,
14 like, to the location that you just testified to, like,
15 how long did you remain at that location in the house?

16 A. At the home?

17 Q. Yes.

18 A. I -- it was -- I don't know what time it was.
19 I couldn't tell you what time it was we left.

20 Q. Right. So you mentioned going upstairs,
21 though, into the home, right, like you went --

22 A. Yes, ma'am. Yes, ma'am.

23 Q. Like how long were you there in that
24 particular area of the home?

25 A. Oh, probably -- I don't know -- maybe 15, 20

1 minutes, probably.

2 Q. Okay. And -- and so did you have any
3 involvement as far as searching or pointing out areas to
4 search or pointing out anything of evidentiary value in
5 the upstairs area of the home?

6 A. No. The only thing I recall having really
7 caught my attention was I -- that the home had what
8 appeared to be an elevator shaft in it. And I know that
9 there was some discussion trying to figure out how to
10 open that up. And I -- I don't know whatever came of
11 that, to be honest with you. But, yeah, I didn't really
12 have much part to play in that, so...

13 Q. And why was there a discussion about opening
14 up the elevator shaft in the residence?

15 A. Well, it's a search warrant, and we were
16 trying to figure out how to get in there.

17 Q. Okay. Thank you. So as far as your
18 involvement on March 23rd, once you made your way
19 upstairs and you were there 15 to 20 minutes, did that
20 conclude your involvement as far as, like, your
21 investigation on March 23rd of 2023?

22 A. Yes. Yes. And that may have gone -- and to
23 be -- to be ultimately clear, that may have gone into
24 next day. So it may have technically been, like, the
25 24th but, you know, wee hours. I don't recall what

1 time, so...

2 Q. Thank you. Understood. So we'll say the 23rd
3 to the early hours of March 24th.

4 A. Okay.

5 Q. So I know -- I see that you have further
6 involvement on March 24th of 2023 when you reached out
7 to Mark Otto by phone.

8 Tell me about that.

9 A. Yeah. So I gave Mr. Otto a call. I had
10 tracked down a phone number for him and gave him a call.
11 And he was busy -- he was out of state at the moment,
12 dealing with some family stuff going on. And so I was
13 able to talk to him briefly and ask him about the
14 vehicle. And he explained to me that he had listed that
15 vehicle for sale in an Auto Trader advertisement. And
16 he said that -- initially that -- whether it was him or
17 the company -- they had listed it improperly and it
18 didn't get a lot of interest.

19 But at some point he did get contacted by
20 Mr. Kosowski. And initially they were unable to come to
21 an agreement on the price because, basically, it sounded
22 like Mr. Kosowski lowballed him on the price and tried
23 to buy it for cheaper than what he was willing to sell
24 it.

25 And so he explained that later on Mr. Kosowski did

1 come back, and they were able to come to an agreement
2 for purchasing the vehicle for \$32,000. And at a -- a
3 week or so later, Mr. Kosowski did go down there and
4 they -- they made the transaction.

5 Q. All right. And so was -- as far as your
6 involvement on March 24th of 2023, was that the only
7 involvement that you had in this case on this particular
8 date?

9 A. I mean, the conversation did go a little bit
10 further in explaining how he got paid and whatnot. But
11 yes, that was -- appears to be my only involvement was
12 that phone conversation that day.

13 Q. All right. Thank you.

14 A. Yes, ma'am.

15 Q. And so fast-forwarding three days to
16 March 27th of 2023, I see that you had some contact with
17 members of the Miami-Dade Police Department?

18 A. Yeah. So while at work, I was informed that
19 there was going to be a search warrant that was going to
20 be conducted on Mr. Kosowski's residence down in Miami
21 and asked to assist with that by traveling down there,
22 and again -- once again, observing a search warrant
23 being conducted at that location. And that was Sergeant
24 Vegenski asking me to respond out there. So he and I
25 separately responded down to Miami for that. And then a

1 while after that, the same evening, Detective Volton
2 also joined us down there.

3 Q. All right. And I see in your report that the
4 Miami residence is located at 1230 Southwest 95th
5 Terrace in Miami.

6 A. That sounds correct, yep.

7 Q. All right. And so how did you assist in the
8 execution of the search warrant? Did -- did you point
9 out, you know, anything of evidentiary value to be
10 seized by the Miami-Dade Police Department during the
11 execution of that search warrant?

12 A. So it kind of went the same way as the one in
13 Tarpon Springs. It was -- you know, we had already been
14 instructed on how to do this. And so Miami folks came
15 in and did -- did everything, and we just kind of
16 observed and pointed out if anything was relevant.

17 Once again, I recall having seen a Gorilla cart in
18 that residence, which also did not appear to be the same
19 as the one that was in the truck. But we -- they --
20 they did have an assigned forensics technician down
21 there that also -- you know, she was there photographing
22 everything and documenting, you know, anything of
23 interest.

24 And I don't know why, but I know we were -- we did
25 collect some trace hair samples from three dogs that

1 were down there. And I know -- I think that had -- and
2 again, I wasn't involved where -- where -- on the day
3 Mr. Kosowski was taken into custody, but I believe it
4 had something to do with some hairs. I can't speak to
5 it. So -- but I was -- I did collect those once
6 they -- from the technician once she had packaged them
7 and whatnot.

8 Q. Okay. And was there anything else collected
9 from the residence besides the hair samples?

10 A. So again, kind of having gone from what our
11 experience was in the Tarpon Springs home, one room in
12 particular in the home appeared to have been recently
13 hastily mopped. And there was a mop bucket and a mop.
14 And -- and you could tell that there was a sheen on the
15 floor of some sort.

16 So while we were there, again, kind of like I said,
17 going back to my thought on the garage floor in the
18 Tarpon Springs home, I asked for them to process that
19 floor. And they did not appear to get any kind of a hit
20 on that floor. But -- but when they processed the head
21 of the mop, there -- there was a reaction. And again, I
22 can't speak to how that works. But -- so we did collect
23 the mop as well.

24 Q. Okay. And so did you do anything else as far
25 as assisting in -- in the search warrant that was

1 executed at the Miami residence on that day?

2 A. Like I said, it was me -- it was me, Sergeant
3 Vegenski and -- and Detective Volton later. And they --
4 it was the same thing. We just observed. They
5 photographed. You know, if we pointed some stuff out,
6 they would photograph it. I believe there was a rifle
7 that Miami-Dade -- we did find a rifle in the home, and
8 I believe that was collected by Miami-Dade.

9 Q. All right. On the next day, on March 28th of
10 2023, I see that you responded to the Kendall Surgery
11 Center with Detective Volton?

12 A. I did, yeah.

13 Q. And so what was your involvement in this part
14 of the investigation?

15 A. So it was my understanding that this was a
16 location where Mr. Kosowski, he was employed, working
17 for, and there had been some evidence collected from
18 when he was arrested that involved some medications.
19 And I do not want to butcher the name of this, and I'm
20 not going try it. But there was a chloride injection
21 medication vial that they had recovered from his
22 vehicle, in the Corolla, when he was arrested.

23 And so that was something of interest that when we
24 were down there speaking with the office manager,
25 Mrs. Romero, that was something we wanted to look

1 into -- if it's something that they utilized at the
2 facility or -- and whatnot, so...

3 Q. Okay. Was there anything collected from the
4 Kendall Surgery Center?

5 A. Well, again, so when -- when I asked about
6 that, those injections, she allowed us to go back.
7 There was a refrigerator in the back -- it's in a common
8 area, but in the back where they stored those
9 medications. And when I reviewed the boxes in -- in the
10 refrigerator, it did have the same identical bottle of
11 that medication, that injectable, and it appeared to
12 have the same manufacturer name and lot number listed on
13 the bottle as what they had in their -- in their
14 refrigerator.

15 And so as I continued to look around, I noticed
16 they have a disposal bin on the floor in the same
17 vicinity, which is basically just a cap that you can put
18 on, take off, so that there was nothing securing that.
19 Then when I looked in there, there happened to be
20 numerous bottles of different medications in there. And
21 in there, there was also observed to be a similar bottle
22 of that medication at the bottom of that bin.

23 Q. All right. And so did you personally take any
24 pictures of what you discovered in the -- in the room?

25 A. Yes. Digital images were taken of it, and

1 those were uploaded to evidence.com. So they should be
2 in the system.

3 Q. All right. And then you -- you next responded
4 to Evolution MD; that was also another doctor's office
5 in Miramar, Florida?

6 A. Yes, ma'am.

7 Q. Okay. And so what was your involvement at
8 this office as far as the investigation is concerned?

9 A. So I met with the office manager up there.
10 This appeared to be a potential -- an additional
11 employer of Mr. Kosowski's. And I don't recall where
12 that information came from, but that's what led me to
13 respond up there. And when I met with the office
14 manager up there, it seemed like they were kind of
15 expecting me, and so they referred me to their -- their
16 attorney.

17 Q. All right. And so were you able to make
18 contact with the attorney for the business?

19 A. Yeah. I spoke to him over the phone and kind
20 of, you know, updated him on why I was looking to just
21 have a conversation about what his -- Mr. Kosowski's,
22 you know, connection was with them. And so he worked as
23 kind of the attorney, Mr. -- I think it -- was it Mazer
24 (phonetic) -- Mazer or something like that. He worked
25 as an in-between between the owner of the business

1 and -- and me and just kind of helped them provide me
2 with information regarding the employment of
3 Mr. Kosowski. And it seems like Mr. Kosowski -- I don't
4 understand how their employments work, but it's almost
5 like he's a contract employment. And they described him
6 as having been there very short -- very recent. And as
7 a matter of fact, they described him as having, like,
8 one -- only had one preop visit and scheduled for a
9 surgery the following Monday, which obviously it didn't
10 take place because he was placed into custody prior to
11 that.

12 Q. Okay. And so did you, you know, find anything
13 of evidentiary value, you know, from the conversation
14 with the business attorney, Mr. Mazer, or anyone else
15 that was working for Evolution MD?

16 A. No. I determined that they did use the same
17 medication; however, those med -- the medications that
18 they had in stock were provided by a different vendor
19 and a completely different lot number as well. So it
20 did not appear to match the medication recovered from
21 Mr. Kosowski's Toyota Corolla.

22 Q. Okay. I do see that you mentioned a text
23 message conversation between an employee at the office
24 and Dr. Kosowski.

25 Can you tell me about that?

1 A. Yeah. So it was -- Mr. Mazer, the attorney,
2 the business attorney, contacted me by phone about an
3 hour or so after I'd left that facility, and -- and I
4 guess at that point he had spoken with the owner and had
5 gotten permission to have this conversation with me.
6 But he said that he spoke with the office manager
7 and -- and -- who had had a text conversation with
8 Mr. Kosowski. It looks like the conversation kind of
9 was dated between March 20th and March 21st, basically
10 about his work hours and when he's going to be able to
11 come in and -- and -- and do, like, an advertisement for
12 Instagram and -- and -- and for bolstering their website
13 with putting him out there as an -- as an employee. So
14 yes, there was -- there were some text string
15 conversations that happened from that.

16 Q. Okay. And then I also see that the last thing
17 that you did on March 28th of 2023 was you went to Coral
18 Springs where you met with Mr. Otto?

19 A. Yes, ma'am.

20 Q. Okay. And so I see that Mr. Otto provided you
21 a written statement.

22 A. He did.

23 Q. Okay. And did you collect anything of
24 evidentiary value, you know, based on your conversations
25 with Mr. Otto?

1 A. So he provided me the written statement,
2 basically explaining everything that -- from our
3 previous phone conversation. And then he did also have,
4 like -- he provided me eight screenshots of the text
5 conversations between him and Mr. Kosowski as they were
6 discussing the transaction of purchasing the vehicle
7 prior. And he -- so he emailed those to my -- to my
8 email, and I was able to later put those into evidence.

9 Q. Okay. So once you, you know, finished your
10 conversation with Mr. Otto, did you have any further
11 involvement, you know, within the area of south Florida
12 conducting any sort of further investigation?

13 A. No. Once that was completed, I -- I -- I was
14 ready to go home.

15 Q. All right. So I see the next, you know, part
16 of the investigation that you were involved in was on
17 March 31st of 2023.

18 A. Yes, ma'am.

19 Q. Okay. And specifically, I'm talking about a
20 location in the area of Alligator Alley.

21 A. Yeah. So I was -- again, at that point, I had
22 been back to Largo, and I was contacted by Sergeant
23 Vegenski, who was with another -- yet again, a different
24 group of detectives down in south Florida by Naples, and
25 he had contacted me, asking me to respond down to the

1 vicinity there. And he gave me specific grid
2 coordinates, and I believe those were obtained from
3 evidence gathered by I don't know who but -- and he gave
4 me specific grid coordinates for an area they wanted me
5 to go to and look around and see if I could find
6 anything of significance.

7 When I got there, it happened to be that those
8 coordinates brought me to one of the -- it wasn't the
9 main entrance, but it was a gated entrance belonging to
10 the Florida Panther National Wildlife Refuge. It was
11 like a back gate off of the interstate. So I did stop
12 there briefly. I walked the shoulder of the roadway.

13 I -- some park employees, I did have a brief
14 conversation with them -- who told me that the -- the
15 facility was home to the Florida Panthers. And so I was
16 like, "Okay, well, I'm good. I'm not going in there,"
17 and I -- and I wrapped that up. Yep.

18 Q. Okay. You said that there was, you know,
19 investigation that was conducted that, you know,
20 was -- essentially directed investigators to this
21 specific set of coordinates. Like, did you receive any
22 specific information about how they came across this
23 specific set of coordinates?

24 A. It's my understanding that it was something
25 obtained -- again, don't quote me on this, but I

1 believed it to be information gathered from probably
2 Mr. Kosowski's phone warrant or something, I assumed.

3 Q. Okay. But you don't know for sure?

4 A. I do not know for sure.

5 Q. Okay. So I see on April 1st of 2023, you also
6 had some further involvement in the case, specifically
7 at Collier County Landfill.

8 A. Yep. So having gotten there late in the
9 evening for what we just discussed previously and
10 finding out that there didn't appear to be anything of
11 relevance, I ended up meeting with the people who were
12 already down in -- meeting up with the detectives that
13 were already down there in that area. And we ended up
14 kind of discussing that, the following day, we were
15 going to go out to the landfill, based on information
16 they obtained from a separate location that I was never
17 at, down there, having to do with a dumpster that they
18 had an interest in, so...

19 Q. Okay. Did you assist, you know, with either a
20 search of the landfill or, you know, the investigation
21 as far as this dumpster that was found?

22 A. So I didn't have anything to do with the
23 dumpster or where that loca -- I never even -- I don't
24 even know where that location exactly was. But I do
25 know that that dumpster, in practice, would have been

1 eventually brought to that landfill, which is why we
2 were going there.

3 Q. Okay. So did you physically respond to the
4 landfill?

5 A. I did.

6 Q. Okay. And so what was your involvement in
7 assisting with the investigation at the landfill?

8 A. So at that point, Sergeant Vegenski had kind
9 of -- I believe it was him that kind of orchestrated
10 getting assistance from the management of the landfill,
11 based on what I understood to be a cadaver dog alert to
12 that dumpster that we previously had mentioned. So
13 based on that information, we thought it reasonable to
14 believe -- to believe that that dumpster being -- you
15 know, it would have been brought there to get dumped.
16 It was worth checking the landfill to see if we could
17 find anything of evidentiary value.

18 So when we got there that morning, Sergeant
19 Vegenski had already organized meeting with members of
20 the landfill staff and the Collier County Sheriff's
21 Office as well as their fire department and forensics
22 personnel. And -- and we all got together and had a big
23 meeting first thing that morning at daylight.

24 Q. Okay. And so during this meeting, was a plan
25 for a search of the landfill discussed?

1 A. There was, yep.

2 Q. Okay. Did you personally participate in a
3 search of the landfill on this particular date of 4/1 of
4 2023?

5 A. I did.

6 Q. All right. Did you find anything of
7 evidentiary value?

8 A. No.

9 Q. Okay. I do see on 4/2 of '23 as well, you
10 continued the search of the Collier County Landfill.

11 A. I did.

12 Q. Okay. And so tell me a little bit about that;
13 like, as far as the search was involved, like, how
14 did -- how was the search conducted, you know, and what
15 were some of the challenges in conducting the search?

16 A. So it was -- the way I understood it is that
17 even though -- standing in the middle of the landfill of
18 that magnitude, there appears to be a -- some
19 organization to it, which you or I probably would not
20 have any idea when you're standing in the middle of that
21 mess. But they did -- they were pretty confident, the
22 staff members there, that they could kind of narrow down
23 where that dumpster would have been dumped on a given
24 day. It sounded like, based on their knowledge of how
25 their area works and the organizational patterns of

1 where they dump on certain areas, plus they had some
2 video surveillance that kind of helped guide them, that
3 they had an idea where -- where to begin looking. In
4 essence, we started to look where they -- where they
5 thought it would be a good spot to start, so...

6 Q. All right. And I see that it's referred to
7 as, like, a grid search in your report.

8 A. Yes.

9 Q. So, like, were you assigned a specific area to
10 search?

11 A. So if you can imagine standing on a giant pile
12 of trash, they narrowed down a -- we'll call it a spot.
13 Essentially, it would probably be -- I don't know -- 30,
14 40 feet wide in a path of -- you know, I don't know the
15 distance of what we would be -- you know, what -- I
16 believe that they could probably describe it better for
17 you. But they had two pieces of heavy equipment, a
18 couple operators there to help us kind of dig through.
19 You're not doing it by hand. It required heavy
20 machinery. So -- and we did that for a couple days.

21 Q. Okay. So heavy machinery. Was there anything
22 else used, you know, as far as excavating, you know, the
23 trash besides heavy machinery, like shovels or anything
24 like that?

25 A. So we came prepared for that sort of thing,

1 but when we got there and realized the gravity of it, it
2 was really unreasonable to think that we were going to
3 go through there with pitchforks and rakes and all that
4 sort of thing. It required heavy machinery. We did
5 have at our disposal a couple cadaver dogs on given
6 occasions, and -- yeah. And we did, like, basically,
7 visuals. There was a bunch of us there trying to help
8 just keep eyes on -- in case something was noticed.
9 That's all.

10 Q. Okay. And so did you find anything of
11 evidentiary value on April 2nd of 2023 during your
12 search of the landfill?

13 A. No.

14 Q. Okay. So moving on to April 5th of 2023, I do
15 see that you assisted further with the investigation.
16 You received some license plate reader reports?

17 A. Yeah. So there is a few different license --
18 they call them LPR systems, the license plate readers,
19 and there is different ones in different areas. And so
20 down in Miami, they utilize three different versions of
21 license plate readers. And the -- one of the detectives
22 down there provided me reports that included two
23 different license plates. One was the vehicle
24 that -- the Toyota Corolla that we had previously
25 mentioned, and I believe the second one was for the tag

1 that we believed to have been on the -- the Tundra.

2 Q. Okay. And I see also that there were some
3 images that you were provided via email by Mr. Otto --

4 A. Yes.

5 Q. -- dated 4/1 of 2023. Okay. I wanted to ask
6 specifically about the -- the gate, the guard gate
7 that -- and just to kind of refresh your recollection,
8 Mr. Otto had mentioned that there was a guard gate at
9 his residence and that Dr. Kosowski when, you know,
10 essentially effectuating the purchase of the Toyota
11 Tundra, arrived at the residence to make that happen.

12 Do you recall that?

13 A. So I recall -- so their original meetings --
14 it sounds like they met up twice. The first one, that
15 it was they couldn't come to an agreement. During that
16 visit, Mr. Otto was described to have been in a small
17 red car. And yes, it's my understanding that at the
18 entrance to Mr. Otto's neighborhood there is a guard
19 house of some sort. I've never been there. But
20 Mr. Otto took it on himself and got with the guard --
21 the management of the guard house or whatever and was
22 able to find documentation of Mr. Otto's Corolla having
23 gone there on 12/13 of '22. And then --

24 Q. Okay.

25 A. And then there was documentation that was

1 found on 12/26 of '22 of Mr. Kosowski in a white car
2 with a separate license plate, which I tried contacting
3 the registered owner of that. He was believed to have
4 been, like, an Uber driver, based on the statement that
5 Mr. Otto previously gave. But I had absolutely no luck
6 getting a hold of that gentleman to have a conversation
7 with him, so...

8 Q. The -- okay. The Uber employee or the person
9 at the guard gate?

10 A. The Uber employee.

11 Q. Okay. And just to, you know, make the record
12 clear, you'd said that Mr. Otto arrived in a red car.
13 You're talking about Dr. Kosowski, right?

14 A. Sorry. Yes. I apologize.

15 Q. No. No problem. I just want to make sure
16 it's clear because, you know, I mean, this happens.
17 So -- so you mentioned that Dr. Kosowski arrived in a
18 red car -- which appears to be the license -- the
19 license plate matching that of the red Toyota Corolla --
20 on 12/13, right?

21 A. Correct.

22 Q. And then on 12/26, there is a documentation on
23 the guard gate computer showing that Dr. Kosowski is
24 visiting in a white car. You're saying that was the car
25 that was likely the Uber driver car?

1 A. That's what I believe it to be, yeah, based on
2 Mr. Otto's previous statements.

3 Q. All right. So as far as the visits, you know,
4 to Mark Otto's residence, what license plate was on the
5 Tundra after Dr. Kosowski bought the truck? Was -- was
6 there any determination made about --

7 A. So I inquired with Mr. Otto. Essentially, he
8 said the day that the purchase was made and the truck
9 left his property, Mr. Kosowski was only carrying a
10 backpack. And so I asked Mr. Otto specifically what tag
11 was on the vehicle when he left, and Mr. -- or excuse
12 me. I asked Mr. Otto what tag was on the vehicle when
13 the vehicle left, and he was adamant that the vehicle
14 did not have his tag on it, and he had no idea what
15 would have been on it at that point in time. And there
16 was no way to confirm through the guard house,
17 apparently, of what left on that day. I don't know that
18 they had documentation for that, so...

19 Q. Okay. So you weren't able to confirm using
20 the guard gate computer, you know, what tag was on the
21 Tundra then?

22 A. No.

23 Q. Okay. And why didn't you document this in
24 your report?

25 A. What part?

1 Q. As far as, you know, the license plate that
2 was on the Tundra when the Tundra left the Otto
3 residence.

4 A. I don't know that there was anything to
5 document because I -- I don't recall for sure, but I
6 don't think that their system captured things leaving.

7 Q. Just coming?

8 A. I believe it's only entering, which is --
9 which would explain why I did not do that, yes.

10 Q. Okay. What did -- so during your
11 conversations with Mr. Otto, you know, when you're
12 documenting essentially the chain of events that led to
13 the purchase of the truck, what did Mr. Otto say as far
14 as, you know, what Dr. Kosowski told him about not
15 registering the truck?

16 A. I don't know that there was any conversation
17 about Mr. Kosowski having it -- registering it. I don't
18 recall there being anything like that.

19 Q. Okay. So there wasn't anything mentioned as
20 far as that particular topic?

21 A. About -- a conversation between Mr. Otto and
22 Mr. Kosowski about registering it?

23 Q. Right.

24 A. I don't -- I don't recall them having a
25 conversation about registering the vehicle.

1 Q. Okay. All right. And so was there anything
2 else, you know, anyone else you spoke with or anything
3 else you came across during your involvement or
4 investigation during this particular date?

5 A. No.

6 Q. Okay. All right. And so was there anything
7 else that, you know, you did after April 5th as far as
8 the investigation is concerned?

9 A. It does appear that I did reach out once again
10 to Mr. Tansy from the Clearwater Toyota, just confirming
11 information that he previously supplied about the
12 vehicle. And I again confirmed with him about the red
13 block lettering and the search on the thing, which
14 I -- at that point, I just wanted to kind of go over it
15 with him because I'd already discovered, through
16 Mr. Otto, that he, in fact, supplied those. I just
17 wanted to make confirmation that they didn't have any
18 other model of Toyota that would have had that, so...

19 Q. Okay. All right. And so as far as the
20 investigation, you know, once you had reached out to
21 Mr. Tansy on April 5th of 2023, did you have any further
22 involvement in the investigation at all?

23 A. No.

24 Q. Okay.

25 MS. RAMOS WICKS: Okay. So I don't have any

1 further questions. I'm going to check in with my
2 partner and see if maybe he's available and has any
3 questions. Oh, he's not here. Okay. So I'll
4 check in, then, with Mr. Vonderheide to see if he
5 has any questions.

6 MR. VONDERHEIDE: I don't have any questions.
7 Thank you. And the witness will read.

8 THE WITNESS: Yes. I'm good.

9 MS. RAMOS WICKS: All right. I think you're
10 good to go.

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14 (Thereupon, the deposition of DETECTIVE JOHN
15 SINNI was concluded at 10:34 a.m.)
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1 STATE OF FLORIDA

2 COUNTY OF POLK

3 I, DETECTIVE JOHN SINNI, under penalties of
4 perjury, declare that I have read the foregoing
5 transcript of my testimony which was taken in the case
6 of State of Florida vs. Tomasz Kosowski, taken on
7 March 5, 2024 and the corrections I desire to make are
8 as indicated on the attached Errata Sheet.

9 Done and signed this ____ day of _____
10 2024.

11

12

Witness

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1 State of Florida vs. Tomasz Kosowski

2 March 5, 2024

3 ERRATA SHEET

4 PAGE LINE CORRECTION REASON

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20 Under penalties of perjury, I declare that I have
 21 read the foregoing document and that the facts stated in
 22 it are true.

23

24

25

DATE _____

WITNESS _____

CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF POLK

I, the undersigned authority, certify that
DETECTIVE JOHN SINNI personally appeared before me and
was duly sworn on March 5, 2024.

Witness my hand and official seal this 15th
day of October 2024.

/s/ Leslie W. Renfroe

LESLIE W. RENFROE
Professional Reporter
Notary Public
State of Florida

REPORTER'S DEPOSITION CERTIFICATE

STATE OF FLORIDA
COUNTY OF POLK

I, LESLIE W. RENFROE, certify that I was authorized to and did stenographically report the deposition of DETECTIVE JOHN SINNI; that a review 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' attorney or counsel connected with this action, nor am I financially interested in the action.

Dated this 15th day of October 2024.

15/ Leslie W. Renfro

LESLIE W. RENFROE
Professional Reporter

The original of this transcript was ordered by and furnished to Bjorn Brunvand, Esquire.