

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

CASE NO.: 23-02935-CF

STATE OF FLORIDA,

Plaintiff,

vs.

TOMASZ KOSOWSKI,

Defendant.

VIDEOCONFERENCE

DEPOSITION OF: ANNE SULLIVAN

DATE TAKEN: December 5, 2023

TIME: 4:25 p.m. to 4:39 p.m.

PLACE: Via Zoom videoconference

STENOGRAPHICALLY REPORTED BY:

Lori A. Seiden, RPR, FPR-C

Notary Public, State of Florida at Large

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728 S. New York Avenue, Lakeland, FL 33815 863-500-3603

1 APPEARANCES:
(Appearing via Zoom videoconference)

2 NATHAN T. VONDERHEIDE, ESQUIRE
3 eservice@flsa6.gov
4 ALEXANDRA G. SPADARO, ESQUIRE
eservice@flsa6.gov
Office of the State Attorney
5 County Justice Center, 14250 49th Street North
Clearwater, Florida 33762
6 (727) 464-6221

7 Appearing on behalf of the Plaintiff

8
9 AMANDA POWERS SELLERS, ESQUIRE
amanda@thepowerdefense.com
10 Amanda Powers Sellers, P.A.
6344 Roosevelt Boulevard
11 Clearwater, Florida 33760
(727) 531-2926

12 - and -
BJORN E. BRUNVAND, ESQUIRE
13 bjorn@acquitter.com
- and -

14 WILLENGY RAMOS WICKS, ESQUIRE
willengy@acquitter.com
15 Brunvand Wise, P.A.
615 Turner Street
16 Clearwater, Florida 33756
(727) 446-7505

17 Appearing on Behalf of the Defendant
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C O N T E N T S

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| EXHIBITS | NONE |

1 The deposition of ANNE SULLIVAN was taken
2 pursuant to notice by counsel for the Defendant on the
3 5th day of December, 2023, commencing at 4:25 p.m., via
4 Zoom videoconference. Said deposition was
5 stenographically reported by Lori A. Seiden, RPR,
6 FPR-C, Notary Public, State of Florida at Large.

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8 ANNE SULLIVAN,
9 a witness, having been duly sworn to tell the truth,
10 was examined and testified upon her oath as follows:

11 THE WITNESS: I do.

12 DIRECT EXAMINATION

13 BY MS. POWERS SELLERS:

14 Q. Can you please state your full name?

15 A. Anne Francis Sullivan.

16 Q. How are you employed?

17 A. I work for Tampa Bay Veterinary Specialist as a
18 customer service representative.

19 Q. Okay. Are you working in Building A or
20 Building B primarily?

21 A. I work both. I've been working more in
22 Building A now due to our staffing needs versus
23 Building B.

24 Q. Okay. Back in March?

25 A. Building B.

1 Q. Have you ever given a deposition before?

2 A. No, I have not.

3 Q. Okay. So it's very simple. Any one of us may
4 be asking you questions. You just tell us the truth
5 because you're under oath. If you don't understand
6 something or you need us to rephrase the question, just
7 tell us.

8 A. Okay.

9 Q. Okay. How long have you been working with the
10 vet clinic?

11 A. It's been about a year and three months; August
12 of 2022.

13 Q. Okay. And were you working on March 21st of
14 this year, which was a Tuesday, when law enforcement
15 showed up?

16 A. Yes.

17 Q. And what time did you get to work that morning?

18 A. I got to work about 7:00 a.m.

19 Q. When you got to work, how did you enter into
20 your office, your A Building?

21 A. Our building has a separate entrance, which I
22 have a key for. I entered in that way and went into
23 my -- into our phone room area and -- to get myself
24 logged in and set up for the day.

25 Q. And do you recall talking to law enforcement,

1 whenever, back in March?

2 A. On that day, yes.

3 Q. Okay. So you had told them back then that you
4 initially tried to enter in through the main lobby.

5 A. Oh, yes.

6 Q. The doors were locked?

7 A. Yes, the door was locked and I used my key.
8 Sometimes we've gone in and out of the front door to
9 access our -- our area as well, but I saw the door was
10 locked, and then of course, came around to the back with
11 my key and let myself in.

12 Q. Okay. There are a lot of doors in those
13 buildings, aren't there?

14 A. Yes.

15 Q. And to my knowledge back in March, there were
16 three businesses: The attorneys' office, the vet office
17 and the tech company.

18 A. Mm-hmm.

19 Q. Is that accurate?

20 A. Correct, yes.

21 Q. And there are other empty offices within the --
22 the administrative building, we'll call it?

23 A. Right.

24 Q. And so do you know if there's someone who is
25 responsible for checking all of these doors to make sure

1 they are locked every night, or are you-all just kind of
2 counting on your individual --

3 A. We always counted on our individual businesses.
4 When we -- when we leave our part of it, we would lock
5 our door that goes to the main hallway into the main
6 entrance area. We usually lock that door at night and
7 then lock our door going to the outside.

8 Q. So I'm not suggesting that this has or has not
9 happened, but if someone were to leave their internal
10 door, that would be the door that leads into the lobby,
11 if they were to leave that door open and there was any
12 other door in another office that was unlocked,
13 technically, anyone would be able to access that -- that
14 business?

15 A. Correct.

16 Q. And are you aware of internal surveillance
17 company -- or surveillance cameras, like indoors?

18 A. Not in this building, that I know of, not
19 inside.

20 Q. When -- what are your hours that you normally
21 work?

22 A. 7:00 to 5:00, Monday through Friday.

23 Q. Have you observed any or have you been made
24 aware of the homeless population in the area, or anyone
25 loitering around that office complex?

1 A. Yes, there have been times when I've come in
2 early in the morning, there was a homeless man sleeping
3 outside the door. There was another time when, between
4 our -- our two buildings there was a homeless guy
5 sleeping during the day, which I called police to have
6 him escorted off the property.

7 Q. You say you started working there in August of
8 2022.

9 A. Correct.

10 Q. Do you recall when these happened? Were they
11 close together in time or is this an ongoing issue?

12 A. It has -- it has been ongoing because of the
13 homeless population in the area. We have caught people
14 sleeping outside near the bushes and so on.

15 Q. Have you seen any evidence of drugs? You know,
16 needles, anything like that?

17 A. No, I have not.

18 Q. Okay. But you personally have called to have
19 someone escorted off the property?

20 A. Yes.

21 Q. Do you recall when that incident was?

22 A. No, not exactly.

23 Q. Approximately?

24 A. I don't.

25 Q. Was it soon after you started?

1 A. I would say -- I would say maybe three or four
2 months after I started; really rough guessing.

3 Q. Okay. And other than your personal experiences
4 and observations, have you been made aware of other
5 incidents?

6 A. No.

7 MS. POWERS SELLERS: Okay. I believe that is
8 all I have.

9 Bjorn, Willengy?

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

11 MS. RAMOS WICKS: I don't have any questions.

12 MS. POWERS SELLERS: I'm doubting myself here,
13 I -- just let me ask you one more.

14 BY MS. POWERS SELLERS:

15 Q. When you spoke to law enforcement, did they ask
16 you if you had seen anything unusual that day?

17 A. The day of the event that this happened?

18 Q. Yes.

19 A. Not that I can recall.

20 Q. Did you see anything unusual?

21 A. Not that morning. I came into the office, got
22 myself situated, and maybe around 9:00-ish, give or
23 take, I went into the hallway to go to the bathroom.
24 That's when I smelled a very strong smell of bleach. I
25 didn't know who was using the bleach or where the smell

1 was coming from.

2 Used the bathroom, came back in. And that was
3 about the only thing odd that happened. And then
4 Blanchard Law had called. The female that was working
5 there said that one of their employees was missing and
6 hasn't come back to his desk. And I got up, and with my
7 co-worker here, Deb, we went and looked in some of these
8 offices, some of the suites that were unlocked on the
9 inside just to look, because, you know, see that
10 someone -- hear that someone is missing, you go look,
11 see maybe if there was a medical event, did something
12 happen. Didn't see anything.

13 Q. Let me stop you there. Let me stop you there.

14 A. Sure.

15 Q. When you say you went to look into the empty
16 offices, these are offices that -- are they part of the
17 space that you rent or are they just empty offices
18 waiting for another person to come in and rent them?

19 A. Waiting for another person to come in and rent
20 them.

21 Q. But did you --

22 A. I'm sorry.

23 Q. That's okay. You go ahead. What you have to
24 say is more important.

25 A. When you leave our office to go into the

1 hallway, there are two suites on the right-hand side
2 that are unoccupied, but unlocked from the inside.
3 Those are the offices we went into just to look to see
4 maybe did someone fall, get hurt, have a medical issue.

5 Didn't see anything. Came back. And then we
6 were alerted a little bit later on that the police were
7 called, that Mr. Cozzi had not returned to his office.
8 And we just, you know, came -- we're working in our --
9 in our own offices. The police were in and out all day.
10 And, you know, that was pretty much how the events
11 unfolded.

12 Q. When you walked around -- well, so I'm looking
13 at the police report, and there's just very brief --
14 there's a couple of sentences.

15 A. Okay.

16 Q. When you spoke with law enforcement, did you
17 tell them about this interaction that you had with the
18 individual from Blanchard, and about the bleach smell,
19 and then walking around and checking offices?

20 A. Yeah, I told them everything.

21 Q. Okay.

22 A. Yeah.

23 Q. And that's why we do these depositions, because
24 they don't -- it doesn't always make it because there's
25 a lot of chaos.

1 So when you walked around the restroom, did you
2 or the individual that was with you go into or open the
3 door to the men's restroom?

4 A. No.

5 Q. So did you-all go into the ladies' room?

6 A. No, because I had just come from the ladies'
7 room a few minutes prior. And then when the woman from
8 Blanchard called, she -- I got up and I said, hey, you
9 know, they have an employee missing. Maybe we should
10 look around and see if something may have happened.

11 We went to those two suites, and then really
12 that was about it. We just walked out toward the lobby
13 area, didn't see anything, couldn't figure out where the
14 smell was coming from. I returned to my desk.

15 Q. When you went into those empty suites, did
16 either of you check the doors to make sure that those
17 doors leading to the outside of the building were
18 locked?

19 A. I did not.

20 Q. Okay. And when you didn't know where the smell
21 was coming from, did you have a general idea of where
22 you thought it was coming from? A specific hallway, a
23 specific door, maybe? You didn't know what it was, but
24 did you know the direction?

25 A. Yeah. Heading toward of the lobby area where

1 the restrooms were it was very strong. I thought maybe
2 somebody was doing a deep cleaning. But, yeah, it was
3 very strong.

4 Q. Did you see anyone check the men's restroom, or
5 did anyone talk about, hey, maybe we should look into
6 the men's restroom?

7 A. No.

8 Q. Okay. To your knowledge, the person that was
9 missing was a male?

10 A. Yes.

11 Q. Okay. Did anyone -- did you see anyone open
12 the men's restroom door?

13 A. No, I did not.

14 Q. When law enforcement got there later, there's
15 an indication that the door was -- may have been open
16 for some period of time.

17 Did you observe that?

18 A. No, I did not. The only time that I went back
19 in the hallway, I saw one of the Largo police officers
20 standing in front of the door.

21 Q. Was the door open or closed?

22 A. Closed.

23 MS. POWERS SELLERS: Okay. I think that's all
24 I have now. I'm sorry.

25 THE WITNESS: Okay.

1 MS. POWERS SELLERS: But my colleagues may have
2 follow-up questions.

3 Bjorn or Willengy.

4 MS. RAMOS WICKS: Nothing that I can think of.
5 I did take, like, additional notes, but I don't see
6 anything that I need to ask.

7 MS. POWERS SELLERS: Okay. Bjorn? I think he
8 is frozen. Very happily, but he looks like he's
9 fine.

10 MR. BRUNVAND: I don't have any questions
11 either. Thank you for asking.

12 MS. POWERS SELLERS: Okay. That is all we
13 have. Thank you. We appreciate your waiting. Have
14 a nice day.

15 THE COURT REPORTER: We need to do the read or
16 waive.

17 MS. POWERS SELLERS: I almost forgot.

18 The court reporter has been taking down
19 everything that we're saying. We will probably
20 order the transcript, and at that time you can opt
21 to read what you testified to today or you can
22 waive.

23 If you read it, it's just, you know, to -- if
24 you wanted to make any notes or -- you know, can't
25 really change it, but you can make notes to -- that

1 something might not be quite right. But that's up
2 to you. You can do either one.

3 THE WITNESS: Okay. I guess I could waive it.
4 Okay.

5 (At 4:39 p.m., no further questions were
6 propounded to this witness.)
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CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF PINELLAS

I, Lori A. Seiden, RPR, FPR-C, Notary Public,
State of Florida, certify that ANNE SULLIVAN virtually
appeared before me on the 5th day of December, 2023,
and was duly sworn.

WITNESS my hand this 19th day of September 2024.

Lori A. Seiden



Lori A. Seiden, RPR, FPR-C
Notary Public - State of Florida
My Commission No.: HH 226917
My Commission Expires: June 6, 2026

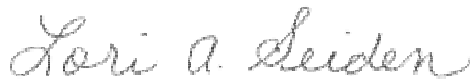
1 CERTIFICATE OF REPORTER

2
3 STATE OF FLORIDA4 COUNTY OF PINELLAS
5

6 I, Lori A. Seiden, RPR, FPR-C, do hereby certify
7 that I was authorized to and did stenographically
8 report the foregoing deposition of ANNE SULLIVAN; that
9 a review of the transcript was not requested; and that
10 the foregoing transcript is a true and complete record
11 of my stenographic notes.

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

17
18 Dated this 19th day of September, 2024.

19
20 

21 _____
22 Lori A. Seiden, RPR, FPR-C
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