

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: ALEXANDRA STECHER

DATE TAKEN: December 5, 2023

TIME: 3:45 p.m. to 4:11 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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(Appearing via Zoom videoconference)

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C O N T E N T S

TESTIMONY OF ALEXANDRA STECHER	PAGE
DIRECT EXAMINATION BY MS. POWERS SELLERS	4
ERRATA SHEET	22
CERTIFICATE OF OATH	23
CERTIFICATE OF REPORTER	24
WITNESS NOTIFICATION LETTER	25
EXHIBITS	NONE

1 The deposition of ALEXANDRA STECHER was taken
2 pursuant to notice by counsel for the Defendant on the
3 5th day of December, 2023, commencing at 3:45 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.

7 - - - - -

8 ALEXANDRA STECHER,
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. Allie, my name is Amanda Sellers. I represent
15 Dr. Kosowski, and you are here because of an incident
16 that was investigated where you work back in March of
17 this year.

18 A. Correct.

19 Q. Do you recall that?

20 A. I do, yes, ma'am.

21 Q. Okay. I'm going to ask you some preliminary
22 questions and then we'll get into some more details
23 about that day.

24 Could you please state your full name?

25 A. Alexandra Stecher.

1 Q. And where do you work?

2 A. I work for Thrive Pet Healthcare. I am one of
3 the technicians for Tampa Bay Veterinary Specialists.

4 Q. Is that at the location on Belcher Road?

5 A. Correct.

6 Q. How long have you worked there?

7 A. I've been with the company for two and a half
8 years.

9 Q. Have you ever given a deposition before?

10 A. I have not.

11 Q. Okay. So there's no wrong answer. You're
12 under oath, so you just -- you're sworn to tell the
13 truth. If you don't understand a question, just say,
14 "Amanda, rephrase it."

15 Do you recall -- and this was Tuesday,
16 March 21st. Do you recall going to work that day?

17 A. I do, yes.

18 Q. And what time would you normally arrive at
19 work?

20 A. Between 9:00 and 10:00 a.m.

21 Q. Were you -- do you know what time you got to
22 work that morning?

23 A. I don't recall.

24 Q. But you're assuming it would have been between
25 9:00 and 10:00?

1 A. Correct. I travel from Orlando to get to work,
2 so I usually arrive during those times.

3 Q. Okay. And when you go to work, what building
4 do you go to, A or B?

5 A. It varies. In both, but on Tuesday I went into
6 Building A, the main building, that is on the left-hand
7 side.

8 Q. How do you remember that you entered into that
9 main building?

10 A. Just because of the situation that occurred
11 that day.

12 Q. Okay.

13 A. I was speaking with the police.

14 Q. Okay. Do you have a key to the atrium
15 entrance?

16 A. I do not, no.

17 Q. Is there another entrance that is used by
18 employees of the Veterinary Specialists?

19 A. There's two entrances. One is the atrium and
20 then the other one is the entrance directly off the
21 parking lot towards the road.

22 Q. Do you have a key to that entrance?

23 A. I do not.

24 Q. And is that because usually that office is
25 open, someone is there when you get there?

1 A. Correct, yes, ma'am.

2 Q. Is it more common for you to enter through the
3 atrium or through that side entrance?

4 A. Side entrance.

5 Q. When you arrived, was anything out of the
6 ordinary? Were police there?

7 A. Nothing out of the normal when I arrived.

8 Q. Okay. You said you walked in through the
9 atrium?

10 A. I walked into Building A, the primary building,
11 the medical offices for the Veterinary Specialists --

12 Q. Okay.

13 A. -- not the atrium side.

14 Q. Do you travel back and forth between Building A
15 and B?

16 A. I do.

17 Q. How often?

18 A. Several times per day.

19 Q. When you arrived on that day around
20 10:00 a.m. -- or between 9:00 or 10:00 a.m., would you
21 have gone to the other building immediately, or what
22 would be your purpose in going to the other building?

23 A. So typically I arrive -- it is to meet with the
24 manager on site. At that time, she was in the other
25 building, which is why I went to the main building.

1 Q. And who is the manager?

2 A. Jennifer Mordenga.

3 Q. How long were you at the main building before
4 you returned?

5 A. I don't recall.

6 Q. And describe the purpose of the main building
7 and the other building, and you know, what -- what
8 business happens in the main building, and what business
9 happens in the atrium building.

10 A. So the main building is for veterinary
11 treatments. That's where all the doctors prescribe
12 medications, see their clients, whereas the other
13 building, that is Building B, is where we have our
14 administrative offices. So we have the call room and we
15 have the manager's office.

16 Q. And that is the building that you -- the
17 veterinary administrative offices shares space, kind of
18 they are in the same building with the attorneys' office
19 and the tech business; is that correct?

20 A. Correct. That's correct.

21 Q. And were there also some empty offices in
22 Building B or the atrium building?

23 A. There are, yes.

24 Q. Are there empty offices in Building A as well?

25 A. No.

1 Q. So that's just one big -- that's where the
2 owners bring their pets in and treatment happens?

3 A. Exactly.

4 Q. So at some point you went to Building B, the
5 atrium building, but you don't remember what time that
6 was?

7 A. I don't.

8 Q. When you entered that building, did you notice
9 anything out of the ordinary?

10 A. I did not.

11 Q. Did you see anyone that was unfamiliar or did
12 not belong there?

13 A. I did not.

14 Q. How long would you have stayed in that
15 building?

16 A. Usually the entire day. I leave around
17 7:00 p.m.

18 Q. Once you're there, you're there?

19 A. Once I'm -- no, that's not accurate. I usually
20 can leave the facility at 7:00 p.m., but I am in both
21 buildings.

22 Q. Throughout the day?

23 A. Throughout the day.

24 Q. And what's the purpose of the traveling back
25 and forth? I'm just --

1 A. I meet --

2 Q. -- kind of --

3 A. I meet with doctors. I kind of observe what's
4 going on with the technicians, and meet with the front
5 desk. So it's a lot of interactions with the team
6 members.

7 Q. Okay. Let me just review my notes here.

8 Do you recall speaking with law enforcement?

9 A. I do, yes.

10 Q. Do you remember about what time police showed
11 up at the building?

12 A. I don't.

13 Q. Do remember which building you were in when the
14 police did show up?

15 A. Yes, I was in Building B.

16 Q. Okay. And did they come to your office?

17 A. They did, yes.

18 Q. Prior to the police showing up, do you recall
19 ever walking near or past the restrooms?

20 A. I did, yes.

21 Q. And did you notice anything out of the ordinary
22 when you passed by the restrooms or went in the
23 restroom?

24 A. I passed by the restrooms once we were notified
25 that it smelled like cleaning products.

1 Q. So someone told you the restroom smells like
2 cleaning products, and you then went -- you did what?

3 A. And then a gentleman from the law group came
4 over, asking our facility manager technician if she
5 cleaned the bathroom. I was next to her when that
6 happened. And she was saying, "No, I didn't touch the
7 bathroom." So we went to look at the bathroom and
8 smelled it. And that's when I walked by the bathroom.

9 Q. Okay. I want to get into that a little more,
10 but before I do, I don't want to forget to ask you this
11 question. When you travel back and forth between
12 Building A and B, what entrances and exits do you use?

13 A. It truly varies. It depends if I'm going to
14 enter the main building from Building B through the
15 front lobby, then I take the door by the admin offices.
16 If I'm entering -- going to enter Building A through the
17 side door, I take the atrium.

18 Q. Do you know which route you took that day?

19 A. I don't recall.

20 Q. Who came into your office and said it smells
21 like cleaning products? Was that when the attorney came
22 over?

23 A. Correct.

24 Q. And you said someone was next to you when that
25 conversation happened?

1 A. Correct. That was at -- I'm sorry. Go ahead.

2 Q. That's okay. Go ahead.

3 A. It was Debra, who was our facility technician.

4 Q. Where did that conversation take place?

5 A. Right outside of Debra's office where she
6 stores all our cleaning supplies next to our admin
7 office.

8 Q. And where is that in reference to the
9 restrooms?

10 A. It is opposite side, down the hallway, towards
11 where the admin offices are for the vets.

12 Q. So once you're made aware that there's a
13 cleaning product smell, you then walk to the restroom
14 area?

15 A. Correct.

16 Q. Did you go into either restroom, the men's or
17 the women's?

18 A. I did not.

19 Q. And did you open the doors?

20 A. I believe somebody opened the door because I
21 was able to look in and smell it, but then as Debra and
22 Joan were discussing it, I -- I left it to them to
23 discuss and I walked back into the admin side.

24 Q. When you say you opened or someone opened the
25 door, was that to the men's or the women's?

1 A. It was -- it was the men's.

2 Q. What did you see when the door was open?

3 A. I didn't really see much. I don't recall if I
4 truly looked in. I just know that it just smelled.

5 Q. Was anyone in there when you looked in?

6 A. No.

7 Q. And so at that point in time you proceeded just
8 to go back to your office?

9 A. Correct.

10 Q. And how long after that did law enforcement
11 show up?

12 A. Maybe within the next hour or so.

13 Q. I believe when you spoke to law enforcement,
14 there was a conversation about typically what people
15 wear that -- that work at the clinic.

16 A. Okay.

17 Q. Explain that to me.

18 A. So technicians typically wear scrubs, whereas
19 the administrators wear business casual. Doctors wear
20 either business casual or scrubs with lab coats.

21 Q. And it's becoming clear now, but the men who
22 work for the veterinary clinic, are they primarily in
23 the main vet building?

24 A. The men are primarily in the main building,
25 although we do have one manager who comes in between

1 both because he is on the administrative side as well.

2 Q. Okay. So it wouldn't be uncommon for the admin
3 male and/or any of the males that work in Building A to
4 be back and forth between Building A and B?

5 A. Not uncommon.

6 Q. Did you have access to surveillance footage?

7 A. Yes, ma'am.

8 Q. Okay. What kind of surveillance is used?

9 A. We have cameras that are on the outside of the
10 facility.

11 Q. On the outside of Building A and B?

12 A. Both buildings.

13 Q. Do you know how many cameras?

14 A. Can I estimate?

15 Q. Sure.

16 A. Upwards of 12.

17 Q. And what type of system is this? Is it
18 constant recording, motion activated?

19 A. Constant recording, cloud-based system.

20 Q. Is it just video or is it video and audio?

21 A. Just video.

22 Q. Who is in charge of operating that?

23 A. Can you rephrase that question?

24 Q. Is there someone -- well, let me ask you a
25 different question first.

1 Is that monitored -- that system monitored?

2 A. Only if we have a reason to look into it.

3 Q. And so there's no one going into the security
4 system weekly or monthly or annually to check and make
5 sure it's working; is that accurate?

6 A. That is correct.

7 Q. It is correct?

8 A. Yes, nobody is going in there to check.

9 Q. Okay. And how does the system work? If you
10 wanted to pull video surveillance from last Saturday, is
11 it -- do you go into an app and you pull it up that way?

12 A. Yes, you have access to it via website, and we
13 can pull up the date and time we need to review.

14 Q. And how long do those videos save? How many
15 months can you go back?

16 A. I believe it's 21 days.

17 Q. Is the system -- if you were to go in the
18 system today and go back two weeks, how do you know if
19 the date and time stamp is accurate? How are you able
20 to confirm that, or are you?

21 A. I have never confirmed it, but if I was ever
22 looking for a specific incident that I know occurred on
23 a certain time, say when a client makes an appointment
24 in our system, I can verify based on that, on the
25 appointment, that's the same thing that matches in our

1 camera system.

2 Q. And did law enforcement request to review video
3 footage --

4 A. They did.

5 Q. -- in your office?

6 Prior to asking you to review that footage,
7 were you able to -- did they ask you to verify time and
8 date stamps or...

9 A. I don't recall.

10 Q. Okay. Do you recall watching any of the
11 footage with law enforcement?

12 A. Yes.

13 Q. And did they extract or make a copy of the
14 footage?

15 A. Yes.

16 Q. Did you keep a copy of the footage?

17 A. I did not.

18 Q. So once they took it, was it deleted or was it
19 on your system for the however many days; 21 days?

20 A. Once they took it, it was on the system till
21 the time passed, and then it just gets recorded over.

22 Q. And who else has access to the security camera
23 footage?

24 A. Our IT team with Thrive Pet Healthcare.

25 Q. Once law enforcement left, did anyone view it,

1 or did you go back and watch anything?

2 A. I did.

3 Q. And you also watched portions of it with law
4 enforcement; correct?

5 A. Correct.

6 Q. What did you observe?

7 A. Be more specific about which portions.

8 Q. So which portions did you view with law
9 enforcement?

10 A. I viewed with them the arrival of the attorney.

11 Q. Is that the attorney that -- that is missing?

12 A. Correct.

13 Q. Okay.

14 A. And I also viewed with them the footage of an
15 individual pulling a cart, and that -- that was the
16 extent of that video.

17 Q. Okay. What -- do you recall what the
18 individual pulling the cart was wearing?

19 A. Could you tell me -- say that again.

20 Q. Do you recall what the individual who was
21 pulling the cart was wearing?

22 A. I recall in jeans and a T-shirt.

23 Q. And did he have a hat on or a mask on?

24 A. I don't remember.

25 Q. Do you remember if it was a black male, white

1 male, Hispanic?

2 A. A white male. White or Hispanic,
3 light-skinned.

4 Q. Do you know -- were you able to tell about how
5 tall he was, or weight?

6 A. I would say average build, but I couldn't say
7 for the height.

8 Q. Do you recall if he had any facial hair?

9 A. I don't recall.

10 Q. What about Mr. Cozzi, the attorney? Do you
11 recall what he was observed to be wearing on the
12 footage?

13 A. As I recall, he arrived wearing a red sweater.

14 Q. Did you see anything else on the footage,
15 either with law enforcement or after they left, that was
16 of any interest or that stood out to you?

17 A. I did not.

18 Q. During the time that you've been working at
19 this location, have you either seen yourself or been
20 made aware of the homeless population in the area?

21 A. I have been made aware of it, but I have not
22 personally witnessed it, but I have heard about it.

23 Q. What have you heard?

24 A. That there have been homeless individuals that
25 have been outside the practice, whether it was behind

1 Building A or behind Building B.

2 Q. And do you recall who told you that?

3 A. I believe it was the nurse manager who had told
4 me.

5 Q. Do you remember if this was an ongoing concern
6 or something to be aware of, or if this was a specific
7 incident?

8 A. It was noted to me as an ongoing concern, just
9 because we do happen to have individuals and employees
10 with our practice, they do go outside to walk pets. So
11 it was mostly a safety concern.

12 Q. Okay. Is there some kind of safety protocol
13 that employees have whenever they are walking pets at
14 night by themselves?

15 A. Yes. They are asked to use a buddy system for
16 their time outside.

17 Q. How long has that protocol been in place?

18 A. It's a more -- it's a more recent one.
19 Exactly, I'm not sure, but I would say within the past
20 six months.

21 Q. Okay. Let me review some notes here. I might
22 have a couple of more questions.

23 When individuals bring their pets in, are they
24 usually carrying them? Are they on a leash? Are they
25 in a crate? Are they in a stroller, pulled by a wagon,

1 or all of the above?

2 A. Larger pets would be on a leash as long as they
3 are stable and able to walk, otherwise it would be
4 carrying in. Smaller pets like cats would be in
5 carriers. We have seen patients be brought in via
6 stroller as well.

7 MS. POWERS SELLERS: I think that's all I have
8 for now.

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

10 MS. POWERS SELLERS: Wait. I might have one
11 more question.

12 MR. BRUNVAND: Willengy, do you have any
13 questions?

14 MS. POWERS SELLERS: Do you --

15 MS. RAMOS WICKS: No, I don't have any
16 questions. Amanda covered it. She was very
17 thorough.

18 BY MS. POWERS SELLERS:

19 Q. What kind of wagon was the individual pulling,
20 if you know?

21 A. Yes, it was like a four-wheel wagon that you
22 use for -- I can compare it to, like, sporting events
23 where I go to my kids to, like, for all the chairs and
24 put the umbrellas into one of those.

25 Q. And what direction was it being carried, or

1 pulled? Sorry.

2 A. It was being pulled towards Belcher Road.

3 Q. Did you notice or were you able to tell if
4 anything was in the wagon?

5 A. From what I recall, there was a blanket on top
6 or some kind of covering on top. I believe it was
7 orange in color.

8 MS. POWERS SELLERS: Okay. Mr. Vonderheide?

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

10 MS. POWERS SELLERS: Ms. Spadaro?

11 MS. SPADARO: No questions. Thank you.

12 MS. POWERS SELLERS: Okay. Ms. Stecher, you
13 are -- we are done with the questions, but the court
14 reporter has been taking everything down. This
15 deposition will be transcribed. We'll probably
16 order a copy of it.

17 You can elect to read the transcript and make
18 any notes if anything, you know, is inaccurate, or
19 you can waive that. Most people waive. It's
20 completely up to you, though.

21 THE WITNESS: I would like to read it, please.

22 (At 4:11 p.m., no further questions were
23 propounded to this witness.)

24

25

ERRATA SHEET

IN RE: STATE OF FLORIDA vs. TOMASZ KOSOWSKI
DEPOSITION OF: ALEXANDRA STECHER
TAKEN: 12/05/2023

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE

Please sign, date, and return this sheet to our office.
If additional lines are required for corrections,
attach additional sheets.

At the time of the reading and signing of the
deposition the following changes were noted:

PAGE	LINE	CORRECTION	REASON
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Under penalty of perjury, I declare that I have read my
deposition and that it is true and correct subject to
any changes in form or substance entered here.

SIGNATURE OF DEPONENT: _____

DATE: _____

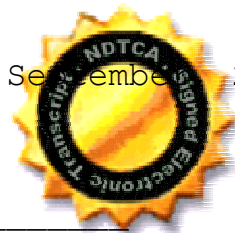
CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF PINELLAS

I, Lori A. Seiden, RPR, FPR-C, Notary Public,
State of Florida, certify that ALEXANDRA STECHER
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

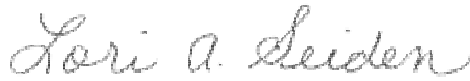
1 CERTIFICATE OF REPORTER

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 ALEXANDRA STECHER;
9 that a review of the transcript was 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
23
24
25

September 19, 2024

ALEXANDRA STECHER
allie.stecher@thrivepet.com

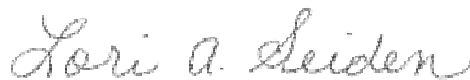
Dear Ms. Stecher:

Your deposition taken in the case of State of Florida vs. Tomasz Kosowski on December 5, 2023, has been transcribed. Per your request to review the transcript, it is being held at our office at 728 South New York Avenue, Lakeland, Florida, until October 19, 2024.

Please call (863) 682-8737 to make arrangements to do this during our regular business hours of 8:30 a.m. to 5:00 p.m.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Lori A. Seiden".

Lori A. Seiden, RPR, FPR-C