

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

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO. 23-02935CF

TOMASZ KOSOWSKI,

Defendant.

_____/

VIRTUAL DEPOSITION OF KRISTEN STROPES

DATE: July 31, 2024

TIME: 3:01 p.m.

PLACE: Various Remote Locations
Via Zoom Video Communications

REPORTER: KIMBERLY L. RENFROE, RPR
Stenographic Reporter

VIRTUAL
APPEARANCES:

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1 DEPOSITION IN DISCOVERY

2 KRISTEN STROPES

3 Pursuant to notice duly given, the virtual
4 deposition of KRISTEN STROPES, called by the Defendant
5 in the above-styled cause, was taken by me, a Notary
6 Public in and for the State of Florida at Large, at the
7 time and place and in the virtual presence of counsel
8 enumerated on Page 2 hereof.

9 Thereupon, it was stipulated and agreed by and
10 between the attorneys for the respective parties, by and
11 with the consent of the said KRISTEN STROPES, that
12 signature to the said deposition be reserved.

13 THE COURT REPORTER: Raise your right hand,
14 please.

15 Do you swear or affirm that the testimony
16 you're about to give in this cause will be the
17 truth, so help you God?

18 THE WITNESS: I do.

19 KRISTEN STROPES, having been first duly sworn via
20 Zoom Video Communications, upon interrogation in
21 discovery, testified as follows:

22 DIRECT EXAMINATION

23 BY MS. RAMOS-WICKS:

24 Q. Good afternoon, Ms. Stropes. My name is
25 Willengy Ramos-Wicks. I'm an associate attorney at

1 Brunvand Wise, P.A., and I am a criminal defense
2 attorney. Along with myself is also Bjorn Brunvand.
3 He's also present at this -- in this virtual forum
4 today; and he's a partner in the firm. He's the lead
5 attorney on the case.

6 So it's the two of us, along with others that
7 represent Tomasz Kosowski in this case. Also present is
8 two state attorneys: Nathan Vonderheide, he is the lead
9 attorney on the case; and then also Alexandra Spadaro.
10 She just joined us. She's also co-counsel, and they're
11 both here on behalf of the State of Florida.

12 And last but not least, I'd like to introduce Kim
13 Renfro, who is our court reporter as well. So you know
14 who everybody is. Okay?

15 A. Thank you.

16 Q. No problem.

17 So we're going to go ahead and get started.

18 Can you please state your name and spell your last
19 name for the record?

20 A. Sure. My name is Kristen Stropes and my last
21 name is spelled S-T-R-O-P-E-S.

22 Q. All right. And Ms. Stropes, where do you
23 work?

24 A. I currently work for the Pinellas County
25 Sheriff's Office in the Forensic Sciences Division.

1 Q. How long have you worked for the Pinellas
2 County Sheriff's Office?

3 A. I've worked in the Forensic Sciences Division
4 since 2016; but before that I did work in another
5 capacity from 2007 to 2011 as a child protection
6 investigator and then as a dispatcher.

7 Q. Did you say dispatcher? I didn't get that
8 last part.

9 A. Yes. Yes, as a dispatcher.

10 Q. So you worked as a dispatcher. You worked as
11 a child protection investigator. And then you
12 transitioned into forensics; is that fair?

13 A. Yes, at another agency. I worked at the
14 New Port Richey Police Department from 2013 to 2016.
15 And then I came back to the Pinellas County Sheriff's
16 Office in their Forensic Sciences Division.

17 Q. Okay. And so with the -- you said Pasco
18 County Sheriff's Office or New Port Richey Police
19 Department? I wasn't sure which one.

20 A. The New -- that's okay. The New Port Richey
21 Police department.

22 Q. All right.

23 So what position did you serve the -- in when you
24 were in the New -- like working for the New Port Richey
25 Police Department?

1 A. I was the crime scene technician, the property
2 and evidence technician, and the lead trainer there.

3 Q. Okay.

4 And then once you came back to Pinellas County
5 Sheriff's Office, did you start off as a forensic
6 specialist?

7 A. Yes.

8 Q. All right. And so, how long have you been a
9 forensic specialist then with the Pinellas County
10 Sheriff's Office; since 2016?

11 A. So since 2016 to 2020, I was a forensic
12 science specialist. And then in 2020, I was promoted to
13 an assistant supervisor. And then in 2023, I was
14 promoted to a supervisor.

15 Q. Okay. So your current position with Pinellas
16 County Sheriff's Office Forensics is as a supervisor.

17 A. That's correct.

18 Q. All right.

19 And so, Ms. Stropes, did you receive any specific
20 training in relation to your promotions to assistant
21 supervisor and then to supervisor?

22 A. Yes. I have several hundred hours of
23 supervisory-type training.

24 Q. All right.

25 A. Specifically for supervisors and leadership.

1 Q. Okay.

2 And as far as your duties as a supervisor go, do
3 you typically write reports documenting your involvement
4 in investigations?

5 A. Yes.

6 Q. All right. And so have -- did you write a
7 supplemental report or a series of supplemental reports
8 documenting your involvement in this particular case?

9 A. Yes, I did.

10 Q. All right.

11 And specifically, I have a Pinellas County
12 Sheriff's Office report that is Supplement 1, report
13 number LA 232583. I also have --

14 A. Yes.

15 Q. -- Supplement 18 and Supplement --

16 A. That's correct.

17 Q. -- 19; is that accurate?

18 A. Yes.

19 Q. All right.

20 Have you had a chance to review these three reports
21 prior to this deposition this afternoon?

22 A. Yes.

23 Q. All right.

24 And in reviewing your supplemental reports, did you
25 note any additions, changes or corrections you needed to

1 make to your supplemental reports?

2 A. No.

3 Q. All right.

4 So as we sit here today, your supplements are full
5 and complete.

6 A. That's correct.

7 Q. All right.

8 How did you become involved in this case,
9 Ms. Stropes?

10 A. We received a call of a missing person. So
11 myself and Assistant Supervisor Klein and
12 Specialist Briggs responded to the scene.

13 Q. Okay. And what was the scene that y'all
14 responded to?

15 A. We responded to a veterinary office that was
16 located -- and an attorney office; they were kind of in
17 the same building on Belcher Road.

18 Q. Once you responded to this particular
19 location, what did you observe?

20 A. So once we responded there, obviously we
21 observed the exterior of the building, and we went and
22 met with detectives. We received some information and I
23 observed a portion of the surveillance. And then we
24 also did a walk-through of the interior of the building
25 in certain locations.

1 Q. Right.

2 And so in doing a walk-through of the inside of the
3 building, what locations did you, you know, observe and
4 enter?

5 A. So I entered the main lobby area. I entered
6 the attorney office section of the building to include
7 Mr. Cozzi's office. I also entered the hallways, the --
8 that adjoined the bathroom, public bathroom area. I
9 also -- we're in the hallways. There were some vacant
10 offices as well, in the southeast portion of the
11 building that I entered. And then I also entered a
12 portion of the veterinary office to view the
13 surveillance.

14 Q. Okay. As --

15 A. I did not -- I'm sorry.

16 Q. Go ahead.

17 A. I did not enter the bathrooms. I did not
18 enter the bathrooms, nor the electrical closet of the
19 building.

20 Q. Okay.

21 And as it relates to these particular locations,
22 did you engage in any processing, supervising any
23 processing or assisting in any processing of, you know,
24 the office areas that you indicated you entered?

25 A. Not any processing, just photography.

1 Q. Okay. So you did document, for example,
2 Mr. Cozzi's office?

3 A. I did not document it, but I did observe a
4 couple things in there. So Specialist Briggs and
5 Assistant Supervisor Klein were the ones that were
6 actually doing the documentation. I just kind of
7 oversaw the two of them while we were on scene.

8 Q. Were there any areas that you specifically
9 photographed in this office building?

10 A. I did not take any photographs here.

11 Q. All right. So in serving in a supervisory
12 role, you know, what are your duties? What's your
13 involvement?

14 A. So as a supervisor, my duties include all that
15 as a specialist is capable of doing, and then the
16 additional supervisor duties as I -- I -- I perform as a
17 liaison between our specialists and the detectives. And
18 basically I kind of assign duties and tasks. And then I
19 kind of am the go-between between detectives if there's
20 questions or updated information. And I -- I do pass
21 that information on to my specialists. And then we go
22 from there depending on the scene.

23 Q. So while you were at this particular scene,
24 and what I mean by that is when -- while you were inside
25 this office building, did you go -- did you supervise

1 any processing of the electrical room or the men's
2 restroom?

3 A. No.

4 Q. Then you indicate in your report you also
5 didn't go inside those particular areas.

6 A. That's correct.

7 Q. Okay. So in your involvement in this
8 particular portion of the investigation, how long were
9 you on scene in a supervisory capacity?

10 A. Approximately from the time of arrival, which
11 is around 4:30 p.m., to about 8:00 or so p.m., so about
12 four hours, give or take, drive time.

13 Q. Okay.

14 And you didn't engage in any processing because you
15 said, you know, obviously you have the training and the
16 processing. So you didn't engage in any processing or
17 collections in this particular location.

18 A. That's correct, I did not.

19 Q. Okay.

20 So I'd like to move on to Supplement Number 18. In
21 this particular supplement, you indicate that you were
22 requested by a Lieutenant Gross to respond to the
23 Forensic Sciences Division processing garage in
24 reference to documenting a vehicle that had been towed
25 there. Do you recall that?

1 A. Yes.

2 Q. Okay.

3 And so there's Supplement Number 19; that actually
4 documents your involvement in the processing of that
5 particular vehicle. Is that fair to say?

6 A. That's correct.

7 Q. Okay. So tell me about that.

8 When you responded initially to the garage, the
9 Forensic Sciences Division processing garage, what did
10 you observe?

11 A. Do you want my -- my initial response or the
12 second time we went back there?

13 Q. Oh, so you went twice. All right.

14 So -- so what about that initial response? Tell me
15 about the initial response.

16 A. So the initial response was for the actual
17 intake of the vehicle. So basically I documented the
18 intake, the vehicle; the tow company had dropped it off
19 there so I just documented there was an (indiscernible)
20 missing from, you know, part of the Tundra on the
21 passenger side, I believe; and that was it. And then we
22 went back to actually do the processing a couple hours
23 later.

24 (Court reporter interruption.)

25 Q. So the same day, not two different days.

1 A. So that's why there's two reports. Correct.

2 (Court reporter interruption.)

3 A. Can I verify just the dates just to double
4 check?

5 Q. One second.

6 MS. RAMOS-WICKS: Kim?

7 (Court reporter interruption for court
8 reporter clarification.)

9 THE COURT REPORTER: She's breaking up on my
10 end. She said there was something missing and I
11 missed what she said was missing from the Tundra.

12 THE WITNESS: It was the letter R.

13 THE COURT REPORTER: R. Thank you.

14 THE WITNESS: A portion of -- yeah -- the
15 decal, I guess, or the -- the pieces that are on
16 the vehicle.

17 (Discussion off the record regarding
18 connection issues.)

19 Q. (By Ms. Ramos-Wicks) Okay. So I'm going to
20 go back a little bit just so we can kind of rehash.

21 You indicated you had been to the Forensic Sciences
22 Division garage twice. So that initial response, what
23 did that consist of as far as your involvement?

24 A. The initial response was just my intake of the
25 vehicle. So the custody intake of the vehicle entering

1 the garage, and my initial observations of the vehicle
2 to include the damage that I noticed.

3 Q. Okay. And you're -- so when you're referring
4 to the damage, you're talking about the piece missing of
5 the R on the passenger-side truck bed?

6 A. Yes.

7 Q. All right. So there's no processing. It's
8 just a general observation of the vehicle, documentation
9 of the vehicle.

10 A. Yes.

11 Q. All right.

12 And when we say documentation, are you talking
13 about written documentation or photo documentation?

14 A. In this case, it was written documentation.
15 It's a vehicle intake form that gets uploaded to our RMS
16 system.

17 Q. All right.

18 And then I believe you said -- you testified that
19 you came back a couple of hours later the same day, so
20 it wasn't two different days, to process the vehicle.

21 A. That's correct.

22 Q. All right. And with that date, I see, you
23 know, the date as March 24th of 2023. Is that accurate?

24 A. Yes. That's correct.

25 Q. All right. Perfect.

1 So I'd like to go, you know, move the -- turn our
2 attention to the actual processing of the vehicle now.

3 So at what point in the day did you come back to
4 process the vehicle?

5 A. At approximately 1:05 p.m. In the afternoon.

6 Q. All right. And what kind of vehicle are we
7 talking about that was documented initially?

8 A. It's a dark gray Toyota Tundra.

9 Q. All right.

10 And so your report indicates that you received a
11 phone call from Detective Bolton and he let you know
12 that the search warrant had been signed and that the
13 vehicle was to be processed; is that fair?

14 A. Yes.

15 Q. All right.

16 Did you receive any additional information
17 reference the vehicle, the gray Toyota Tundra?

18 A. No, just that it was ready for processing.

19 Q. Okay.

20 And did you take possession of the Toyota Tundra
21 from Lieutenant Gross or was it, you know, members of
22 the Pinellas County Sheriff's Office that did that?

23 A. Technically, I took possession once I went to
24 the garage.

25 Q. Okay. But you didn't take possession at the

1 scene where it was recovered from; it was just at the
2 garage.

3 A. Correct.

4 Q. Okay.

5 And was there any point in time, you know, to your
6 knowledge, where the Tundra was not in possession of
7 Pinellas County Forensics personnel or being, you know,
8 directly watched or supervised?

9 A. Not to my knowledge.

10 Q. All right.

11 And so in this gap in time -- right? -- because --
12 sorry, that's a little loud.

13 In this gap in time that we talked about where, you
14 know, you do the initial intake form in the morning and
15 then you process the truck, you know, sometime in the
16 afternoon at -- you know, at 1:00 or 2:00 p.m., what did
17 you do in that in-between time?

18 A. Possibly approve reports or assist other
19 members; I don't know exactly, unfortunately. Just my
20 normal daily duties.

21 Q. Okay.

22 All right. So when you encounter the truck later
23 in the afternoon, it's at the Forensic Sciences Division
24 processing garage, still being stored there.

25 A. Correct, yeah. It's still secured there.

1 Q. Okay.

2 All right. So I have -- I have a couple of photos
3 of that -- the particular location, like where the truck
4 was. So I'm going to share screen.

5 (Screen shared.)

6 Q. Okay. So this is the initial photo that I
7 have. It's the very first photo after the card, you
8 know, that shows who took the photos and the date and
9 the case number.

10 A. Okay.

11 Q. Is this the particular truck that we're
12 talking about that you processed at the Forensic
13 Sciences garage?

14 A. Yes.

15 Q. Okay.

16 And was this the -- like, I guess, are these
17 photos -- and I'm going to go through and name them.

18 So it's -- I mean, in our records it's P-DSC_002.
19 And then I'll show you 003, 004, 005, 006, 007, 008,
20 009, 0010, 0011, 0012, 0013, 0014, 0015, 0016, 0017,
21 0018 and 0019. I think that's enough.

22 Are these photos a fair and accurate representation
23 of the condition that the vehicle was in, you know, when
24 you first encountered it at the Forensic Sciences
25 Division garage?

1 A. Yes.

2 Q. And so going back to 0015 for a second. You
3 indicated that the vehicle was still sealed with
4 evidence tape; is this an example of what evidence tape
5 is and -- and what it looked like on the truck?

6 A. Yes.

7 Q. Okay. And so this was throughout the truck
8 that the truck was sealed with evidence tape?

9 A. Yes. There's various portions of the vehicle
10 that have that.

11 Q. For example, there are some evidence tape here
12 at P-DSC_0021; is that fair to say?

13 A. Yes.

14 Q. Okay.

15 And so what's the reason for sealing of the vehicle
16 with evidence tape?

17 A. That's just to maintain the integrity of the
18 interior of the vehicle until we can have it processed
19 while they're waiting for the search warrant.

20 Q. Okay.

21 A. It shows -- it shows that the doors haven't
22 been entered since the tape has been applied.

23 Q. Okay.

24 And so once, you know, you begin processing the
25 vehicle, was the evidence tape broken so that you could

1 enter the vehicle as far as the interior of the vehicle
2 is concerned?

3 A. Yes. That's correct.

4 Q. Okay. So your report indicates that
5 Specialist Briggs was the one that took these general
6 photographs of the vehicle, interior and exterior; is
7 that accurate?

8 A. Yes.

9 Q. Okay. And he also photographed the truck bed
10 as well?

11 A. That's correct.

12 Q. All right. There was a -- I'm just going to
13 spell it T-O-N-N-E-A-W [sic] cover, a tonneau cover that
14 was removed. Where -- where was that cover placed when
15 it was removed?

16 A. It -- it's a part of the truck bed. So it
17 kind of rolled back.

18 Q. Oh, it rolled backwards?

19 A. Or like lifted up, I guess you -- you could
20 say.

21 Q. All right. Did it remain attached to the
22 truck or did you, like, remove it physically from the
23 truck?

24 A. I believe it was attached to the truck. I'd
25 have to see -- he has additional photos once we opened

1 it, so I'd have to see that to verify for this
2 particular model.

3 Q. Okay. I'll locate those photos and continue.

4 A. Okay.

5 Q. So you indicated that you tested several areas
6 within the Tundra truck bed and the cabin of the truck
7 with phenolphthalein. Is that accurate?

8 A. That's correct.

9 Q. Okay. So can you walk me through that? Like,
10 how do you test for phenolphthalein? And what -- what
11 reagents do you use?

12 A. Sure.

13 The reagents we use would be isopropyl alcohol,
14 phenolphthalein and hydroperoxide. It's a three-step
15 process. So if we identify an area we would like to
16 test, we'd take a sample of that area. And then we
17 would test that area using the alcohol first. And then
18 we would use a phenolphthalein. Then we would use the
19 hydrogen peroxide. And if we were to get a color change
20 immediately upon adding the hydrogen peroxide to the
21 sample, we would note that as a positive result for the
22 possibility of blood.

23 Q. Okay.

24 And as far as the testing is concerned, can you
25 please describe how a positive quality control test for

1 phenolphthalein is done?

2 A. Sure.

3 The positive control test is done using what's
4 called a known blood card. So those come with the kits
5 and we will take a swab or a sample of that area; we
6 will then apply the chemicals in the same process I just
7 described to you; and again, note if the color change
8 occurred immediately upon adding the hydrogen peroxide.
9 That would be considered the positive control telling us
10 the chemical is working as it's designed to work.

11 We also do a negative control which we would take a
12 plain swab, apply the chemicals in the same order, and
13 noting there should be no color change along that
14 process; thus, again, confirming the chemicals are
15 working as designed.

16 Q. Okay.

17 And was a positive quality control test done in
18 this particular case in processing the areas that you
19 processed and collected samples from?

20 A. Yes.

21 Q. Okay.

22 And is there such a thing as a negative quality
23 control test for phenolphthalein?

24 A. Yes. That's the last one I just described
25 with the plain swabs. With nothing.

1 Q. Okay. The plain swabs. No reagents.

2 A. Well, we would take a swab, a -- or a swab and
3 apply the chemical reagents to that swab in the same
4 order we would, for a positive control test and --
5 expecting to be no color change. If there is no color
6 change, that means the chemical is working as designed
7 and not reacting with something in the swab.

8 Q. Okay.

9 And was a negative quality control test conducted
10 for this particular processing of -- of the Toyota
11 Tundra?

12 A. Yes.

13 Q. All right.

14 Are there any agents that, you know -- or reagents
15 that could give a false positive result to a
16 phenolphthalein test?

17 A. There are.

18 Q. Okay. Like what?

19 A. Anything that is oxidizing in nature. So I
20 mean, anything that's got that kind of property. So
21 like even broccoli or something to that effect. But it
22 is specific to blood. So that's why we would say it's
23 presumptive only. And we would have to confirm the --
24 the sample through a laboratory.

25 Q. Okay.

1 So I'm going to share screen again so that you can
2 see the photos that were taken of the bed of the truck
3 specifically, and ask you some questions about that.

4 A. Okay.

5 (Screen shared.)

6 Q. Can you see that okay?

7 A. Yes.

8 Q. All right. There we go.

9 So it -- is this photo -- and this is P-DSC_0064.
10 So 0064. Is this a fair and accurate representation of
11 the bed of the truck as you encountered it, you know,
12 once that cover was pulled back that you referred to?

13 A. Yes.

14 Q. Okay.

15 I can maximize it. Is that better?

16 A. Yes, a little better, yeah.

17 Q. Okay.

18 And we have a few more photos. Like this is a
19 close-up photo. 65. So P-DSC_0065. A few more photos,
20 that I'm just going to kind of breeze past.

21 But this particular photo, P-DSC_0068 is this --
22 and -- and for the record, I have my mouse hovering over
23 what is my right side of the photo.

24 Is this the particular cover that we're talking
25 about?

1 A. Yes. That's correct.

2 Q. Okay. Perfect.

3 Sorry this is taking so long. It's just that when
4 I tried to do it with larger thumbnails, it was
5 impossible. So we're going this way.

6 Okay. So were particular areas that you collected
7 samples of -- of possible blood were those marked?

8 A. Yes.

9 Q. Okay.

10 So this photo --

11 A. I didn't -- sorry. To be clear, I did not
12 collect the blood samples. I just tested the areas to
13 see --

14 Q. Thank you for clarifying. Okay. So I'll make
15 sure that that's clear.

16 So testing. The areas that you tested for the
17 presence of possible blood, were those areas marked?

18 A. Yes. Those would be the areas that Assistant
19 Supervisor Klein took samples from.

20 Q. Okay. So is this photo here -- and that's
21 P-DSC_0078 -- is this an example of an area that was
22 marked and a sample was collected from -- sorry, let me
23 rephrase that.

24 Is this an area -- an example of an area that was
25 marked?

1 A. Yes.

2 Q. Okay.

3 And so you're saying that another specialist,
4 Specialist, I believe you said Klein, collected a sample
5 from this particular area.

6 A. Correct. She would take a swab and that
7 (indiscernible) a sample and then for evidentiary
8 purposes, to be submitted to the lab later on. And then
9 also a sample that I was able to test.

10 Q. Okay.

11 MS. RAMOS-WICKS: Kim, did you get that?

12 THE COURT REPORTER: I missed the very first
13 part of it.

14 Q. (By Ms. Ramos-Wicks) Okay. Can you just say
15 what Specialist Klein would have -- would have done, you
16 know, as far as collecting the sample?

17 A. Yes.

18 She would take a sample from the area marked for it
19 to be further tested later on.

20 Q. Okay. Thank you.

21 And so then you would -- you went behind her
22 essentially, and tested it?

23 A. Correct. She would hand me the additional
24 swab for testing, so we would test the sample to see
25 whether or not it reacted with the phenolphthalein.

1 Q. Okay. So you said additional swab. Like how
2 many swabs of this particular area marked Number 1 were
3 collected?

4 A. Typically there would be an evidentiary
5 collection sample. And then depending on how much blood
6 is there, that would determine if we took a separate one
7 to test or we tested one of the two swabs that were used
8 to take the initial sample.

9 Q. Okay. And so this process occurred with all
10 nine areas that I see here that are marked, you know,
11 that are different areas of the truck; is that fair to
12 say?

13 A. Yes.

14 Q. Okay.

15 So here's Marker Number 2. Is this a fair and
16 accurate representation of this particular area on the
17 truck where a sample was collected by Specialist Klein
18 and you did the testing?

19 A. I am still seeing the image for Area 1.

20 Q. Oh, there you go.

21 A. Oh, now it's populated.

22 Q. Okay.

23 A. Yes.

24 Q. Okay.

25 And then this is Area Number 3. Is this a fair and

1 accurate representation of the area that you tested?

2 A. I'm just waiting for it to populate.

3 Yes.

4 Q. Okay.

5 Area Number 4?

6 A. Yes.

7 Q. All right.

8 Area Number 5. Is this a fair and accurate
9 representation of the area you tested?

10 A. Yes.

11 Q. And then it looks like it skips to Number 7;
12 so I'm going to skip to Number 7 as well.

13 There we go.

14 Can you see that okay, once it pops up?

15 A. Yes.

16 Q. Okay.

17 So this photo here which is P-DSC_0087, it shows 6,
18 7, and 8. So is this a fair and accurate representation
19 of Area 6, 7, and 8 would -- with -- that you tested?

20 A. Yes.

21 Q. And for the record, the photo, it depicts a
22 white piece of paper with a number on it to mark each
23 area.

24 A. Yes.

25 Q. Okay. Thank you.

1 Just looking for Number 9.

2 There we go.

3 All right. So. And it's -- once you have a chance
4 to look at it -- I'll give you a minute.

5 Is this one populated?

6 A. I just -- I see Area 8 still.

7 Q. Okay. I'll wait.

8 A. Now it's on Area 6 with scale.

9 Q. Oh, no. All right. It's going slow. Okay.
10 I'll wait.

11 A. Yeah, I see it.

12 Q. Okay, perfect.

13 So is this a fair and accurate representation of
14 area marked Number 9 that you tested?

15 A. Yes.

16 Q. Okay.

17 So as it relates -- and I'm going to stop sharing
18 screen.

19 A. Okay.

20 Q. So as it relates to these particular areas --
21 right? -- were there any areas that, you know, you
22 didn't test as far as for the presence of possible
23 blood, you know, according to your report?

24 A. No, we tested all of those areas.

25 Q. All right.

1 And then you indicated that you tested additional
2 areas throughout the vehicle with what you term, like
3 you -- in your words, are blind swabs. Can you tell me
4 what a blind swab is?

5 A. A blind swab just means that there isn't any
6 obvious visible blood. So we would swab the area,
7 basically, depending on what the item is and in the
8 various locations.

9 Q. All right. And so those particular areas are
10 the driver side front floor door mat -- sorry. Driver's
11 side front floorboard mat; the driver's side seat
12 headrest; the driver's side center console lid; the
13 passenger side center console lid.

14 Those particular areas you tested for the presence
15 of possible blood?

16 A. That's correct.

17 Q. Okay. And there was positive results there,
18 too, in those areas?

19 A. That's correct.

20 Q. All right.

21 Now there's an extensive list -- and I'm not going
22 to belabor the point here -- of areas that were tested
23 that resulted in the -- in negative results for the
24 presence of blood; is that fair to say?

25 A. That's correct.

1 Q. Okay. And they're all listed in your report?

2 A. Yes.

3 Q. Are there any areas that you tested for the
4 presence of blood that are not listed in your report?

5 A. No, they are all listed in my report.

6 Q. Okay.

7 So you indicated that a positive quality control
8 test was conducted using luminol and proper results were
9 received. Can you walk me through what the luminol
10 testing consisted of, and what areas you tested?

11 A. Sure.

12 The luminol presumptive test for blood is -- has a
13 positive control using a -- again, a known blood sample.
14 So we would swab the known blood card, and then we would
15 apply the chemical reagent to that known sample; and
16 then expecting a color change of a light blue hue --
17 luminescence or glow are some more simplified terms.
18 And then we would say that the chemical was working as
19 designed.

20 Q. All right.

21 And so it was Assistant Specialist Klein that
22 applied luminol to the truck bed with an -- yeah, to --
23 applied luminol to specific areas in the truck bed?

24 A. Yeah. She applied luminol to the truck bed.

25 Q. Okay.

1 And so then once she applied the luminol to the
2 truck bed, then you went and swabbed the specific areas
3 that are listed in your report?

4 A. Correct. Any areas that are observed to be
5 luminescing that light blue color, I took a swabbing of
6 that.

7 Q. Okay.

8 So your report indicates that you obtained, you
9 know, areas of chemiluminescence; like there was areas
10 of chemiluminescence that you observed in the truck bed.

11 Did you test those areas with phenolphthalein after
12 you observed that chemiluminescence from the luminol?

13 A. Yes. That's correct.

14 Q. Okay.

15 And so my question is: In some of those areas of
16 luminol chemiluminescence -- chemiluminescence -- I
17 apologize -- there was no phenolphthalein reactivity.

18 Can you explain the significance of that result?

19 A. So that means the luminol was reacting with
20 something else other than blood if we get a negative
21 phenolphthalein test afterwards.

22 Q. Okay.

23 Are there any agents that could give a false
24 positive result using luminol?

25 A. Yes. Multiple.

1 Q. Okay. Like what?

2 A. Certain household detergents, cleaners. Some
3 paints, fruit, iron metabolizing plants to various
4 things. That's why we do the phenolphthalein, which is
5 more specific to blood, just to give more of a higher
6 probability that the sample would contain possible
7 blood.

8 Q. Okay.

9 And so in this particular case, you -- or not you,
10 sorry -- Specialist Klein applied luminol to the truck
11 bed. That luminescence was observed. And then you went
12 and used phenolphthalein on specific areas. And there
13 were areas that did result in positive -- in a positive
14 result for the presence of possible blood; is that fair
15 to say?

16 A. Yes. That's correct.

17 Q. Okay. And so those particular areas were the
18 truck bed, center of the tailgate; the truck bed
19 passenger side, slash, large area.

20 So what do you mean by large area?

21 A. There was a larger stain in the images. So
22 that particular area.

23 Q. Okay.

24 And so there was no other areas of the truck
25 that -- in which, you know, areas of the truck where

1 luminol was applied that were positive for the presence
2 of possible blood.

3 A. With which chemical? So the --

4 Q. Sorry. The luminol.

5 A. Oh, with luminol?

6 So we did have another chemical luminescent area on
7 the passenger side tailgate. However, once I tested
8 that swab with phenolphthalein, that was a negative
9 result.

10 Q. Okay.

11 And also, Specialist Klein, you note in your
12 report, applied luminol to the driver's compartment as
13 well?

14 A. That's correct.

15 Q. And so you observed that chemiluminescence
16 that we've been discussing at length during this
17 deposition?

18 A. That's correct.

19 Q. Okay.

20 And so you then went and swabbed specific areas
21 where this chemiluminescence was observed, right?

22 A. Yes.

23 Q. Okay.

24 So what I have is the driver's side seat back,
25 close to the door. Like that was the only area that was

1 swabbed?

2 A. Correct. That was what luminesced.

3 Q. All right. And then you tested the area with
4 phenolphthalein for -- to see if there was blood.

5 A. Afterwards, yes.

6 Q. Okay. And this was a negative result for the
7 presence of possible blood.

8 A. Yes. Correct.

9 Q. Okay.

10 Do -- do luminol and phenolphthalein cross-react?
11 You know, is -- that is, you know, can one agent cause a
12 positive result in the other?

13 A. No, not to my knowledge.

14 Q. Are there any agents that could give a false
15 positive result with both phenolphthalein and luminol?

16 A. They react with different things, so I don't
17 know of that possibility. The luminol reacts with the
18 iron portion of the blood, and the phenolphthalein
19 reacts with the heme portion of the hemoglobin. So I'm
20 not sure. That's outside my scope whether or not they
21 would react, the same things.

22 Q. Is it important to document the
23 chemiluminescence that's observed with luminol with
24 photographs?

25 A. Yes.

1 Q. And why is --

2 A. We'll document --

3 Q. -- that?

4 A. -- that.

5 Just it helps us provide more -- a better
6 demonstrative report to kind of explain what areas we
7 noted the chemi -- chemiluminescence in.

8 Q. Okay.

9 And did you discuss your findings with Largo Police
10 Department personnel after you completed your analysis?

11 A. So we didn't do any analysis; but after the
12 processing, he was on scene with us, so.

13 Q. Okay. When you say he, like, who was on scene
14 with you?

15 A. I believe it's -- Detective Bolton? No, I
16 think he -- I don't remember if he was there.

17 Can I check my report to see if he actually
18 responded as well --

19 Q. Sure.

20 A. -- to this particular scene?

21 Q. Okay.

22 A. Let me doublecheck.

23 Okay. So, no, he didn't respond in this particular
24 situation. So I did not specifically discuss with him
25 afterwards any results of our findings.

1 Q. Okay. With him or anyone else?

2 A. Just the people that were in the garage with
3 us.

4 Q. And so who all was in the garage?

5 A. That would be Specialist Briggs and Assistant
6 Supervisor Klein.

7 Q. Okay. So no personnel from Largo PD.

8 A. Not to my recollection, no.

9 Q. Okay.

10 And so no Largo PD personnel were present at any
11 time during your, like, processing of the Toyota Tundra.

12 A. No.

13 Q. All right.

14 So once you completed, you know, your processing of
15 the gray Toyota Tundra in this case, did you -- did you
16 have any further involvement as far as, you know,
17 conducting any follow-up analysis on anything that was
18 collected?

19 A. No, I did not.

20 Q. Okay.

21 And to your knowledge, you know, like -- because
22 you indicated there's confirmation testing that's
23 done -- right? -- to -- to actually confirm that this is
24 blood. To your knowledge, do you -- did you have any
25 access to the results of the confirmation testing in

1 this case?

2 A. No, I have not seen any of the results for
3 that.

4 Q. And just to be clear, you're not the one
5 that's doing the confirmation testing. You're just
6 submitting the samples.

7 A. That's correct.

8 Q. Okay.

9 MS. RAMOS-WICKS: I don't have any further
10 questions.

11 I'll check in with Mr. Vonderheide to see if
12 he has any questions.

13 MR. VONDERHEIDE: No follow-up for me. Thank
14 you.

15 THE WITNESS: Okay.

16 MS. RAMOS-WICKS: And so I'm going to stop the
17 recording right now, Ms. Stropes, because I have a
18 question, but I don't want to ask it on the
19 recording.

20 THE WITNESS: Okay.

21 MS. RAMOS-WICKS: Okay. So would you like to
22 read or waive this particular deposition?

23 THE WITNESS: I'd like to read, please.

24 MS. RAMOS-WICKS: Okay. So Kim is going to
25 ask for your information so that we can make sure

1 that, you know, it gets to you, but we didn't want
2 it to be on the recording.

3 THE WITNESS: Well, thank you.

4
5 THEREUPON, the virtual deposition concluded at
6 3:46 p.m.

ERRATA SHEET

IN RE: State of Florida versus Tomasz Kosowski

DATE TAKEN: July 31, 2024

WITNESS: KRISTEN STROPES

Page	Line	Correction	Reason
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Under penalties of perjury, I declare that I have read
the foregoing document and that the facts stated in it
are true.

DATE (KRISTEN STROPES)

CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF PINELLAS

I, the undersigned authority, certify that
KRISTEN STROPES personally appeared before me via Zoom
Video Communication and was duly sworn on July 31, 2024.

Witness my hand and official seal this
30th day of December, 2024.



Kimberly L. Renfro
KIMBERLY L. RENFROE, RPR

Notary Public, State of Florida
Commission No.: HH 80650
Expiration Date: 1/31/25

1 REPORTER'S DEPOSITION CERTIFICATE

2 STATE OF FLORIDA

3 COUNTY OF PINELLAS

4 I, Kimberly L. Renfroe, Registered Professional
5 Reporter, certify that I was authorized to and did
6 stenographically report the virtual deposition of
7 KRISTEN STROPES; that a review of the transcript was
8 requested; and that the transcript is a true and
9 complete record of my stenographic notes.

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

15 Dated this 30th day of December, 2024.

16
17 
18 _____
KIMBERLY L. RENFROE, RPR

19
20
21
22
23 (Transcript ordered by Jeanette Bellon, Esquire, on
24 December 10, 2024.)
25

December 31, 2024

Kristen Stropes
xxxxxxx@xxxxxxx.com

Dear Forensic Specialist Stropes:

Your virtual deposition taken in the case of State of Florida versus Tomasz Kosowski on July 31, 2024 has been transcribed. Per your request to review the transcript, it is being held at our office at 728 South New York Avenue, Lakeland, Florida, until February 7, 2024.

Please call 863-500-3603 to make arrangements to do this during our regular business hours of 8:30 a.m. to 5:00 p.m.

Thank you for your prompt attention to this matter.

Sincerely,

Kimberly L. Renfroe, RPR