

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

STATE OF FLORIDA,

Plaintiff,

vs.

Case No.: 2023-02935-CF

TOMASZ KOSOWSKI,

Defendant.

_____/

VIRTUAL DEPOSITION OF GEORGE VILLANTI

DATE TAKEN: AUGUST 1, 2024

TIME: 1:58 p.m. - 2:30 p.m.

Examination of the witness taken virtually before:

Tammy Kelley

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

APPEARANCES

Counsel for the Plaintiff:

NATHAN VONDERHEIDE, Esquire
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Counsel for the Defendant:

WILLENGY W. RAMOS WICKS, Esquire
BJORN BRUNVAND, Esquire
Brunvand & Wise, P.A.
615 Turner Street
Clearwater, Florida 33756

I N D E X

AUGUST 1, 2024

WITNESS

Called by the Defendant:

GEORGE VILLANTI

DIRECT EXAMINATION BY MS. RAMOS WICKS..... 6

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CERTIFICATE OF REPORTER..... 34

SIGNATURE LETTER..... 35

1 THE COURT REPORTER: Would you raise your
2 right hand, please. Do you swear or affirm the
3 testimony you shall give in this cause shall be
4 the truth, the whole truth, and nothing but the
5 truth?

6 THE WITNESS: Of course, yes.

7 GEORGE VILLANTI, called as a witness by
8 the Defendant, having been virtually duly
9 sworn, testified as follows telephonically:

10 DIRECT EXAMINATION

11 BY MS. RAMOS WICKS:

12 Q Once again, good afternoon, Mr. Villanti.
13 Before we get started, I just want you to know that I
14 will be recording this deposition on video and audio.

15 Do you consent to it being recorded on video
16 and audio?

17 A I do, yes. Thank you.

18 Q Okay. All right, just want to make sure. So
19 I am going to hit the recording button and then we are
20 going to go ahead and get started. Okay?

21 A Okay.

22 Q All right. So, Mr. Villanti, my name is
23 Willengy Ramos Wicks and I am an associate attorney at
24 Brunvand Wise, P.A. Along with myself also present on
25 this virtual forum is Bjorn Brunvand. He's my boss and

1 he's the partner of the firm and he's the lead attorney
2 on the case.

3 So us two, along with others, we represent
4 Tomasz Kosowki in this case. So we're the defense
5 attorneys. Okay?

6 A Okay, very good.

7 Q All right. And then along with myself and
8 Mr. Brunvand is also Mr. Vonderheide, Nathan
9 Vonderheide. He is the state attorney and he's here on
10 behalf of the State of Florida and he's also the lead
11 attorney on this case. Okay?

12 A Great. Thank you.

13 Q All right. And in addition to us three
14 lawyers is also our amazing court reporter, Tammy
15 Kelley. She's going to be making a record of this
16 proceeding. All right?

17 A She's amazing. Great. Thank you.

18 Q Yeah, she is. So I wanted to first ask, you
19 know, so I see like you're in what appears to be a
20 private residence. Is there anybody, like, sitting
21 next to you or like --

22 A My wife is right here.

23 Q Okay. I would ask that, you know, you either
24 step into a more private setting or that she step away,
25 please.

1 THE WITNESS: Okay. Can you go in the
2 bedroom.

3 UNIDENTIFIED FEMALE VOICE: I'm walking
4 back and forth.

5 THE WITNESS: Go in the bedroom. Thank
6 you.

7 A Okay, she's going in the bedroom.

8 Q Okay. Is there anybody else sitting, like,
9 next to you or around you?

10 A No. Right -- as of right now, no.

11 Q Okay. All right. So I -- you know, prior to
12 getting started I always like to give, you know,
13 witnesses an overview of, like, why they're here,
14 right.

15 So you are listed as a witness by the State
16 of Florida. Mr. Vonderheide listed you as a witness.
17 And so with that in mind -- and I see that relocating.
18 So I'll let you get settled really quick.

19 A I'm just trying to get comfortable, yes.
20 Thank you.

21 Q Yeah, no problem. You good?

22 A Yeah, I'm perfect. Thank you.

23 Q All right. So with that in mind, what that
24 means is that, you know, you saw something, you heard
25 something, you know something that's related to the

1 case and we anticipate you'll be testifying about that
2 if this case were to proceed to jury trial. Okay?

3 A Okay.

4 Q And so knowing that, you know, defense
5 attorneys have an opportunity to take your deposition
6 in preparation for trial. Okay?

7 A Good.

8 Q So what that means is that we're gonna be
9 asking you questions about your involvement in the
10 case. We're not here to embarrass you. We're not here
11 to put you on the spot. We're just here to find out
12 what you know in preparation for the trial. All right?

13 A Very good. Yes, thank you.

14 Q So with that in mind, there is a record of
15 the proceeding that's being created right now. It's
16 going to be in the form of a transcript. Ms. Kelley's
17 actually taking down everything I'm saying right now.
18 And then of course the deposition is being recorded on
19 audio and video.

20 So for our purposes, you know, I'm going to
21 be asking you questions and you're going to be
22 answering questions. It's going to be very
23 conversational.

24 With that in mind, I'm just going to ask you
25 to keep a couple of guidelines in place so we can make

1 sure that your answers are really clear for the record.

2 Okay?

3 A Very good.

4 Q All right. So the first one is, you know,
5 that there's going to be times obviously like when
6 you're answering a question you might be wanting to
7 answer that nonverbally, like nodding your head or
8 shaking your head. I would ask that you not do that.

9 The reason for that is because although I
10 might catch it, Ms. Kelley might not catch it and she
11 might not be able to make it part of the record. Okay?

12 A Very good. Yes.

13 Q All right. And then the second thing I'm
14 gonna ask is, you know, there may be a point in the
15 deposition where we get to a yes-or-no answer. In our
16 normal speech patterns it's normal for us to say um-hum
17 or hm-hmm and kind of know, like, what we mean by that.
18 But Ms. Kelley might not, know what you meant and she
19 might not be able to distinguish if that's a yes or a
20 no. Okay?

21 A Got it.

22 Q All right. Perfect. So we're gonna go ahead
23 and get started. Can you please state your name and
24 spell your last name for the record.

25 A My name is George Villanti. G-e-o-r-g-e V-,

1 as in Victor, i-l-l-a-n-t-i.

2 Q All right. Mr. Villanti, what city and state
3 do you live in?

4 A I live in Naples, Florida.

5 Q All right. And how long have you lived in
6 Naples, Florida?

7 A 17, 17 years. Give or take, 16 to 18,
8 somewhere around there.

9 Q Quite some time.

10 A Yeah.

11 Q All right. And, Mr. Villanti, do you work?

12 A I do.

13 Q All right. And where are you employed?

14 A I work, I work at waste management.

15 Q Okay. Tell me about waste management.

16 What's your position with waste management?

17 A I am a driver for the commercial front end
18 load. We pick up mostly commercial. We have the truck
19 that has the forks in it and dumps the dumpsters.

20 Q I was just about to ask you that. So what
21 does waste management do generally?

22 A Basically we go around and we pick up the
23 garbage in Collier County.

24 Q Okay.

25 A We have a lot of different, we have a lot of

1 different variations of that. We have residential,
2 roll off, front end, quite a few different areas. My
3 area would be front end that would -- front end load
4 specialist.

5 Q Okay. And I was picked up on that, like
6 there's some differences. So, like, what's the
7 difference between, like, commercial, which is what you
8 said that you do, and, like, residential?

9 A So I go to, like, restaurants and hospitals.
10 Whereas, residential goes to the neighborhoods,
11 different neighborhoods. You know, you put out your
12 little toter and they come by and they pick it up with
13 the arm and they dump it. Whereas, I come by and I
14 pick up the dumpster and I dump, and I dump it.

15 Q Okay. So, you know, the truck that you drive
16 then would be different than, like, a truck that
17 typically --

18 A Yes, absolutely. Yeah.

19 Q Okay. And the difference I'm picking up on
20 here is that with the residential area, like we're
21 picking up individual trash cans, with commercial we're
22 picking up a full dumpster and dumping it in?

23 A Absolutely, yes.

24 Q Okay. And how long have you, have you been
25 working for waste management?

1 A I think it was about seven years, yeah.

2 Q Seven years. And has that been, like,
3 totally, like, your -- there's years of experience been
4 just commercial or like --

5 A Just commercial, yep. This is my only job
6 here, yeah.

7 Q Only commercial?

8 A Yep.

9 Q Okay. Do you have, like, any prior
10 experience doing waste management and prior to joining
11 this particular waste management?

12 A No. When I moved down to Florida, I applied
13 for the job, I qualified for the job, I got the job.
14 And that's been it since, since I moved down here,
15 yeah.

16 Q Okay. So tell me, you know, what's your
17 typical route that you take like as, you know, a
18 commercial waste management specialist.

19 A Commercial. I usually -- sometimes I pick
20 up -- usually in the morning I go and I pick up my
21 commercial areas. Which would be restaurants, wide
22 open areas. And then later on in the day after 6:00
23 p.m. I go to the commercial areas which might be condos
24 and places like that.

25 So in the early morning I go to commercial

1 areas and then later on I might go to residential like
2 condo, condo, condo areas, so.

3 Q Okay. And is there, like, a particular
4 schedule that you work on as far as pick-ups are
5 concerned?

6 A No. Usually we go to the outlying areas
7 before 6:00. After 6:00 I can go anywhere that I want
8 to be. So after 6:00 I can go into residential area.

9 Q All right. We're talking 6:00 a.m. or 6:00
10 p.m.?

11 A 6:00 a.m., yes.

12 Q Okay. Are there particular days that you do
13 pick-ups at certain locations?

14 A For the most part, for the most part, no. We
15 have our set schedule. So I just follow what's on my
16 tablet in the morning and I go.

17 Q Okay.

18 A Yeah.

19 Q So as far as, you know, like the particular
20 areas that you go to, you know, you said some are
21 commercial and some are residential. Is there -- are
22 you familiar with a dumpster that's located on Loop
23 Road?

24 A I am, yeah.

25 Q Okay. In Collier County?

1 A Yes.

2 Q Okay. So where is this particular dumpster
3 located? Like, what's the location? Is it commercial?

4 A It's off of East Trail. We call East Trail
5 41. It's sort of set off into the -- it's set off to
6 the back. So if you don't know where it is, you don't
7 know where it is. In other words, it's not set out,
8 you know, for everybody to see. Loop Road would be the
9 road that it's off of.

10 And it's -- over there they have like RV, RV
11 homes, maybe -- if you had a quad or something you want
12 to drive in the trails, they have a little -- like
13 these are areas that would be for commercial pick up
14 more or less only.

15 Q Okay. And if you said if you don't know
16 where it is then you don't know where it is. So is it
17 not, like, typically accessible to the public like in
18 an area --

19 A It's off of 41. It's right off of 41. If
20 you don't know where it is, you -- this can that we're
21 talking about right here, if you don't know where it
22 is, you don't know where it is, no. It's a lot off.

23 So if you're driving down 41, you won't see
24 it off the side of the road. You have to go down --
25 you have to go off the road a little bit to see it,

1 yeah. It's definitely not in view when you're driving
2 down 41.

3 Q Okay. So how far off is it like --

4 A It's -- the reason why I say that is because
5 it's behind, like, bushes and stuff like that. So
6 it's, it's on the corner of 41 and Loop Road and it's
7 in, in a little park area.

8 So if you don't know where it is, you don't
9 know where it is. You understand what I'm saying.

10 Q Yeah, I hear you.

11 A It's kind of hidden.

12 Q Okay. And you said it's in a little park
13 area. Is this, like, a park that, you know, people go
14 to?

15 A No. It would be like a park for quads, for
16 people on -- you understand quads? Trikes, stuff like
17 that, to go off the beaten path it's where that area
18 is.

19 Q Okay. Are locals known to, like, stay there?
20 Like, can an RV or a camp out there?

21 A There's very few locals over there off of 41.
22 There's a couple of small areas right there. But I
23 guess -- honestly, if you ask me, you have to know the
24 can is there to actually go and find it.

25 Q Okay. So this particular can as you refer to

1 it, did you speak with the -- with law enforcement,
2 like members of, like, you know, a law enforcement
3 agency about this particular can?

4 A I did.

5 Q Okay. And so tell me how often do you pick
6 up from this particular location on --

7 A That one is once a week.

8 Q Once a week.

9 A I go there every Thursday and I pick up the
10 can, yes.

11 Q Okay. What time on Thursday?

12 A Usually in the area by 9:00, 9:30. Somewhere
13 around there.

14 Q Okay. In the morning?

15 A Yeah.

16 Q Okay. So --

17 A 8:30. Between 8:30 and 9:00, 10:00 I'm gonna
18 be in the -- yeah, yeah, yeah.

19 Q Somewhere in that neighborhood?

20 A Yeah.

21 Q All right. And what kind of -- like, are you
22 using, like, your truck to pick up this particular can
23 on Loop Road?

24 A Well, it's a truck that's provided me --
25 provided by Collier County and it's a front end

1 commercial pick-up truck, yeah, so.

2 Q Okay. So tell me how the pick-ups are done
3 with your front end commercial pick-up truck.

4 A So it has two forks on the front of it and I
5 approach the can, I bring the forks down. I bring the
6 forks into the can. Once they're in the can, I bring
7 the can over the truck, I dump it, and then I bring the
8 can back down and after that I usually pack the can.

9 So I take the blade and I maneuver the blade
10 so that it's backward and it kind of pushes everybody
11 underneath and I continue on to the next stop.

12 Q Okay. And is that standard for every stop
13 that you make?

14 A That's more or less standard, yes.

15 Q Okay.

16 A I would say standard, yes.

17 Q So I want to take you back to in particular
18 March of 2023. Do you recall, like, doing your usual
19 pick up at this dumpster over on Loop Road and 41?

20 A I do.

21 Q Okay. And when you're making this pick up on
22 this particular -- you know, during this particular
23 time, did you notice anything out of the ordinary or
24 unusual about the can when you made this particular
25 pick up?

1 A No, nothing unordinary or unusual, no.

2 Q Okay.

3 A Basically the can just sitting there when I
4 got there, yeah.

5 Q Okay.

6 A So nothing unusual.

7 Q And so as usually you would, you know, take
8 your truck, lift up the can, dump the can, and then do
9 the compacting with the blade and continue to move on?

10 A That's exactly right, yes.

11 Q Okay. And so during this process, like, was
12 there anything that stood out to you about the can?

13 A Well, yeah. When I -- after I had dumped the
14 can, I make a little U-turn in the parking lot there
15 and then I go about a half a mile down the road and I
16 pick up another can.

17 And when I got to that road, so go down, I
18 noticed that there was an odor coming from the can.
19 Actually before I actually got on the -- on that road
20 to make -- to go down to my next stop, which is about a
21 half a mile away, I actually notice an odor coming from
22 the can, yes.

23 Q Okay. And what kind of an odor are we
24 talking about?

25 A It's -- I really can't put my finger on it.

1 It was, it was an unusual distinctive odor that I've
2 never -- I don't know, I just never really smelled
3 before. So it was, it was overpowering. It was
4 engulfing -- it felt like it was taking the air out of
5 the cab.

6 But I had no idea what it was. You know, I
7 wasn't thinking like anything. I just continued on
8 down the road.

9 Q Okay. And so, you know, in your seven years
10 of experience with waste management, like are you
11 familiar with the particular smells that come out of
12 these cans when you're doing your pick-ups?

13 A Yeah, sure. When, you know, when I'm going
14 to Texas Roadhouse, I know what I'm getting. When I go
15 to P.F. Chang's, I know what I'm getting.

16 For -- you know, I pretty much know what to
17 expect at every can when I get there. The can we're
18 talking about on Loop Road was kind of surprising
19 because the smell that was coming out of it was just
20 different from what I've experienced in the past.

21 Q Okay. And, you know, in addition to the
22 smell, are you particular -- are you familiar with,
23 like, the kind of trash that's like -- and the kind of,
24 you know, debris that --

25 A Well, yeah, more or less. In that area right

1 there it's a -- it's like an RV park. So people that
2 take their quads out and they go out, you know, riding
3 and stuff like that.

4 So it's -- I would call it general trash that
5 goes in there. It's general. You know, you -- you
6 know, what's ever left over at the dinner table goes in
7 the garbage bag and then goes into that can.

8 And it's not in a very full can. It's one of
9 those, you know, it's one of those cans that isn't full
10 all the time and is general as far as trash goes.

11 Q Okay. So you indicated, you know, that you
12 noticed that the smell was unusual but you did your
13 pick up and continued on your route. Did you finish
14 your route for that day?

15 A I did finish my route that day. And the
16 smell came out of the can when -- I have a stop that's
17 about a quarter of a mile, half a mile down the road
18 from there and it's a bumpy road. So I had to go slow.

19 And I noticed that the smell from the can --
20 I really -- I can't explain the smell that was coming
21 out of it. It was, it was unique. It was very bad.

22 And I remember because the next stop that I
23 go to there's an estuary and the guy -- sometimes he
24 comes out to see me and I kept on thinking I got to get
25 rid of this and try to push it back so that it

1 doesn't -- it was smelling so bad I kept on thinking I
2 got to get -- if this guy is out here to -- because a
3 lot of people come out to talk to me, say, hi, how you
4 doing. Especially this guy down here, he's in the
5 middle of nowhere and a lot of times he comes out to
6 talk to me.

7 And I kept on thinking I got to get this
8 underneath. Like, when you push the blade back, the
9 garbage goes underneath and it kind of kills the smell.
10 You would be surprised. My truck doesn't smell that
11 bad.

12 So when I was going down the road and I was
13 experiencing what I was experiencing from this, I
14 thought that I need to get this underneath -- I kept on
15 packing the truck and packing the truck trying to get
16 the smell to -- you know, to bury the smell so that
17 when this guy came out to say hello to me it wouldn't
18 be as offensive as it was when I was going down the
19 street, yeah.

20 Q Okay. And so did you have the interaction
21 with the guy? Like, did you have a conversation?

22 A He did not come out. No, he did not.

23 Q Okay. So the guy at the estuary didn't come
24 out this particular day?

25 A He did not come out, no.

1 Q Okay. So in completing your route, like how
2 many more steps -- stops do you have after --

3 A I might have put on another, like, 40 --
4 between 40 and 50 stops on there.

5 Q Okay. Before you -- and then once you're
6 done with your route, where do you typically go?

7 A I go to the landfill, yes.

8 Q Okay. So as far as, like, using that blade,
9 right, like pushing the trash and debris underneath,
10 like how many times does that occur like between, you
11 know --

12 A How many times did I push the blade back?

13 Q Yeah, pushing that blade back and compacting
14 the blade?

15 A That may be -- could be 200 times.

16 Q Okay. And so once you make it to the
17 landfill, what's your -- what steps do you take?

18 A Once I get to the landfill, everything is --
19 you know, I try to keep everything packed as I possibly
20 can. I get to the landfill. I back up to the area
21 that they want me to back up into, I open the tailgate,
22 and I push everything out.

23 Q Okay. And then after that what happens?

24 A And then after I push it out, I bring it to a
25 clean-out area, and I go behind the blade. The blade

1 pushes everything forward and pushes it out of the
2 truck. I leave it there. I go to clean out the area.
3 And anything that's behind the blade I clean out with a
4 shovel.

5 Q Okay. And this particular route that you
6 took on, you know -- I have the date as March 23rd,
7 2023.

8 A Right.

9 Q Do you do standard procedures as far as, you
10 know, taking the truck to the landfill, you know,
11 dumping the load, and then cleaning out behind the
12 blade?

13 A It was all standard, yes.

14 Q Okay. And as you cleaned behind the blade,
15 you know, did you note anything unusual or out of the
16 ordinary?

17 A No. It was funny because as bad as the smell
18 was during the day, after I had dumped the truck,
19 because it was, it was bad, and I figured once I get
20 back there it was going to be bad. But once I had
21 pushed the truck out and I had dumped the garbage, that
22 smell had dissipated. So, yeah, it wasn't as bad as I
23 thought it was going to be.

24 Q Okay. So, and I want to fast forward
25 obviously to your interaction with law enforcement.

1 Did you discuss, you know, everything that we
2 discussed just now with law enforcement when you were
3 asked about this?

4 A More or less. They had taken pictures of my
5 truck and he had asked me about the can and I told him
6 about the offensive smell. It was, it was a vial smell
7 that was coming from the can. It was actually a smell
8 that -- I can't -- it, like, attached itself to me.

9 So, like, it's something that I -- even
10 though I pushed the blade back a bunch of times and I
11 buried it, it was a smell that stuck with me for a long
12 time.

13 I went to -- I stopped to get coffee and when
14 I stopped to get coffee I got one of those pump sprays
15 for the air freshener and I shot it in my air vents.
16 Because I felt like that smell had attached itself.
17 That's the only way I can explain it, is it attached
18 itself to me. It was in my nostril or whatever.

19 I couldn't get rid of it. And I sprayed it
20 all inside of my truck. And I went to the landfill,
21 pushed out, cleaned out behind my blade like I normally
22 do. And more or less that was, that was the end of
23 that.

24 Q Okay. So when did you talk to members of law
25 enforcement about this particular --

1 A It was a few -- I think it was maybe two or
2 three days later.

3 Q Okay.

4 A Yeah. They met me at the landfill and they
5 were excavating the landfill.

6 Q All right. And so did you provide, like, a
7 written statement of what you recall from that
8 March 23rd --

9 A I spoke to, I spoke to the investigators or
10 the detectives that were there. I didn't give a
11 written statement, but I spoke to them.

12 Q Okay. Mr. Villanti, when I'm asking the
13 question, just let me finish the question before you
14 answer it --

15 A Oh, I'm sorry, yeah.

16 Q -- for the court reporter. Okay?

17 A Yeah, yeah. I'm sorry.

18 Q No problem. I just don't want to talk over
19 you. So I immediately stop talking. Because I'm sure
20 you know where I'm going. But I want to make sure I
21 finish the question. Okay?

22 A Got it. Thank you. I'm sorry.

23 Q No problem.

24 So while you were speaking with law
25 enforcement, did you -- were you shown a video of the

1 dumpster being -- the can being dumped into your truck?

2 A No, I did not.

3 Q You were not shown a video?

4 A No. The video I was shown was later on at my
5 office what the dispatcher had shown me a video of the
6 can that I had dumped.

7 So it wasn't with the officer. It was with
8 my dispatch.

9 Q Okay. So tell me about that. I mean was
10 that later the same day on March 23rd of 2023 or was it
11 later the same day that you spoke with members of law
12 enforcement?

13 A I want to say it was -- I can't be 100
14 percent, but I want to say it was the same day I spoke
15 to law enforcement or maybe a day earlier. Because
16 whenever law enforcement went to my branch and reviewed
17 the video that day my dispatch showed me the video. So
18 whatever day that was, that was that day that I saw it.

19 Q Okay. And who was your --

20 A I'm not 100 percent what day it was, yeah.

21 Q Okay. And who was your dispatcher?

22 A At that time it was Alex, Alexandria Smith.
23 She's not there anymore. She's in Orlando.

24 Q Alexandria Smith?

25 A Yes.

1 Q Okay. And why did Alexandria show you the
2 video?

3 A She showed me -- I'm sorry, continue.

4 Q No problem. Were you given any reason for
5 being shown this video by Alexandria?

6 A She told me that the investigators were there
7 and looking at the video and she showed me the video
8 that they were looking at.

9 Q Okay. So when you saw the video, was it just
10 you and Alexandria present or were there other people
11 present?

12 A No, it was just me and Alex. I called her
13 Alex for short. Everybody calls her Alex for short.

14 Q Okay. And so when Alex showed you the video,
15 did you talk to law enforcement about that video?

16 A I did not.

17 Q Okay. What did you see on the video?

18 A She just showed me that this is what the --
19 that they were looking at. It was just a -- it was
20 just the can on Loop Road going into my truck. That's
21 all.

22 Q Okay. And as far as, you know, any follow-up
23 with law enforcement, like, did you have any follow-up
24 with law enforcement, like, about the video or, like,
25 any other details that you recall from this March 23rd,

1 2023 pick up?

2 A I did not speak to any law enforcement about
3 the video. It was just a video that was shown to me by
4 Alex. And after that date I do not believe -- I did
5 not see anything -- I did not speak to anybody about
6 the video. I can tell you that.

7 Q Okay. And have you had any further contact
8 with any members of law enforcement, like detectives or
9 deputies about, you know, what you know about this
10 March 20th, 2023, pick up since you spoke with them a
11 few days after that?

12 A No. The only person I spoke to was the --
13 somebody contacted me from -- to make sure that I was
14 going to be on the phone call today. I think it was
15 the prosecutor.

16 Q Okay.

17 A To make sure that I was going to make the
18 phone call today. That's it.

19 MS. RAMOS WICKS: All right, I don't have
20 any further questions. I'm going to check with
21 Mr. Brunvand to see if he has any questions.

22 THE WITNESS: Oh. Thank you.

23 MR. BRUNVAND: No questions. Thank you.

24 CROSS-EXAMINATION

25 BY MR. VONDERHEIDE:

1 Q Mr. Villanti, I do have one question. Did
2 you get a chance to review the statements that we
3 mailed out to you today, your statements to law
4 enforcement?

5 A I did.

6 Q Okay. And there's a quote in there that says
7 you said it was -- the smell was fucking vial is what
8 the quote is. Is that something that you would have
9 said?

10 A That's -- that sounds about right, yes, sir.

11 Q Okay. So you saw that and that's something
12 that you would have said?

13 A Yes.

14 Q All right. And then also in there it said
15 that you had -- you saw the video with them. Was that
16 inaccurate?

17 A I'm sorry, not with them.

18 Q Okay.

19 A I did see, I did see the video privately with
20 my dispatch. But I did not see it with the officers.

21 Q All right. So you didn't watch it with them,
22 but you did see the video?

23 A I did, yes.

24 Q And it was the video of that can being poured
25 into your truck, right?

1 A That's what I have been led to believe, yeah.

2 Q Okay. And you would have spoken to law
3 enforcement at some point, right, after you reviewed
4 the video? Because you would have seen it by your
5 dispatcher had you watch it?

6 A No. I spoke -- the only time I spoke to law
7 enforcement was at the landfill.

8 Q Right.

9 A And after that I saw the video through my
10 dispatch. But after that I did not speak to anybody
11 about the video or anything like that, no.

12 Q When you watched -- do you remember seeing
13 the video?

14 A I -- yeah, I remember seeing the video.

15 Q All right. And what did you think you saw
16 when you saw that video?

17 A The only thing I can say is I saw a bag with
18 some weight falling into the truck. That's it.

19 MR. VONDERHEIDE: Okay. All right, I
20 appreciate it. Thank you. Thank you for your
21 time today, sir.

22 THE WITNESS: Absolutely. Thank you.

23 MS. RAMOS WICKS: All right. Any other
24 questions from any other parties?

25 All right. So I'm going to stop the

1 recording and then, Mr. Villanti, I just have a
2 question I need to ask you.

3 THE WITNESS: Sure.

4 MS. RAMOS WICKS: Okay. So, Mr. Villanti,
5 you have an opportunity to take a sneak peek at
6 your deposition. What that means is that you
7 have the right to read a copy of your
8 deposition to see if there's any mistakes or
9 errors in the transcription.

10 And so what happens is if you, like,
11 identify something like I didn't say that or
12 this came out wrong, then that will be made
13 part of what's called an errata sheet.

14 It's not going to change the original
15 deposition, but it will preserve, you know,
16 whatever mistakes you're saying are there. So
17 you have the right to read a copy or you can
18 waive a reading of that copy of your
19 deposition.

20 But I just want to let you know if you
21 waive a reading that doesn't mean, like, you're
22 never going to see your deposition. I'm sure
23 that Mr. Vonderheide will provide you a copy in
24 preparation for your trial testimony.

25 So what would you like to do?

1 THE WITNESS: I would love a reading.

2 (The deposition was concluded at 2:30

3 p.m.)

ERRATA SHEET

DO NOT WRITE ON TRANSCRIPT -- ENTER CHANGES HERE

IN RE: STATE OF FLORIDA VERSUS TOMASZ KOSOWSKI

DATE TAKEN: AUGUST 1, 2024

REPORTER: TAMMY KELLEY

PAGE NO.	LINE NO.	CHANGE	REASON
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Under penalties 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.

GEORGE VILLANTI

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF POLK)

I, the undersigned authority, certify that
GEORGE VILLANTI, virtually appeared before me
and was duly sworn.

WITNESS my hand and official seal this 17th
day of December 2024.

TAMMY KELLEY
NOTARY PUBLIC - STATE OF FLORIDA
MY COMMISSION NO. HH 216644
EXPIRES: 02/07/26



REPORTER'S DEPOSITION CERTIFICATE

STATE OF FLORIDA)

COUNTY OF POLK)

I, TAMMY KELLEY, certify that I was authorized to and did stenographically report the virtual deposition of GEORGE VILLANTI, that a view 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, nor am I a relative of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 17th day of December 2024.



TAMMY KELLEY

December 17, 2024

Mr. George Villanti
geomicvic@comcast.com

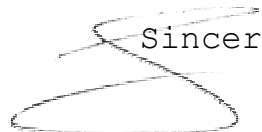
Dear Mr. Villanti:

Your deposition taken in State of Florida versus Tomasz Kosowski on August 1, 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.

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,

A handwritten signature in black ink, appearing to be 'Tammy Kelley', written over the word 'Sincerely,'.

Tammy Kelley