

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 LANCE WAGONER

DATE TAKEN: SEPTEMBER 12, 2023

TIME: 9:38 a.m. - 10:10 a.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
ALEXANDRA SPADARO, Esquire
Office of State Attorney
Post Office Box 17500
Clearwater, Florida 33762-0500

Counsel for the Defendant:

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

DEBRA B. TUOMEY, Esquire
Debra B. Toumey LLC
5026 Cumberland Lane
Spring Hill, Florida 34607-2307

I N D E X

SEPTEMBER 12, 2023

WITNESS

Called by the Defendant:

LANCE WAGONER

DIRECT EXAMINATION BY MS. TUOMEY..... 4

ERRATA SHEET..... 30

CERTIFICATE OF OATH..... 31

CERTIFICATE OF REPORTER..... 32

SIGNATURE LETTER..... 33

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: I do.

7 LANCE WAGONER, called as a witness by the
8 Defendant, having been virtually duly sworn,
9 testified as follows:

10 DIRECT EXAMINATION

11 BY MS. TUOMEY:

12 Q Good morning. Can you please state your
13 full legal name for the record.

14 A Yes, Lance Wagoner.

15 Q And could you spell your last name.

16 A W-a-g-o-n-e-r.

17 Q All right. And how are you employed?

18 A I am a detective with the City of Largo
19 Police Department.

20 Q All right. We are here on the State of
21 Florida versus Tomasz Kosowski, 2023CF-02935. And
22 you've been listed as a witness by the State of
23 Florida.

24 So this is my opportunity to ask you some
25 questions about your reports and what you did in the

1 investigation. Okay?

2 A Okay.

3 Q All right. And have you had an
4 opportunity to review all of the reports that you
5 wrote in this case?

6 A I did.

7 Q Did you find any mistakes or omissions in
8 there?

9 A I found one mistake on my first supplement
10 on the fourth paragraph down. It says later on the
11 same date.

12 Q Okay. And what --

13 A It should be March 23rd. I thought I
14 had -- when I was going through and submitting it I
15 thought I had changed it, but I didn't.

16 Q Okay. I appreciate that. All right. So
17 you said you work for the Largo Police Department?

18 A I do.

19 Q All right. And how long have you worked
20 there?

21 A Twenty-three years.

22 Q Any previous law enforcement experience?

23 A No.

24 Q All right. And what's your, your title?

25 A I am currently assigned as a detective in

1 the work for fraud. I work for fraud.

2 Q All right. Can you tell me how you got
3 involved in this case.

4 A I was asked to assist on a day following
5 that Mr. Cozzi was reported missing.

6 Q And who were you asked to assist by?

7 A The detectives with the crimes against
8 person. There's four of them in our unit. So they
9 had asked the rest of us to help with following up
10 on anything that they needed done, which we always
11 do on any homicide investigation.

12 Q All right. What's the first thing that
13 you did?

14 A I was asked with -- to go with Detective
15 Wedin to go look for any video surveillance of a
16 Toyota Tundra going northbound on Belcher Road.
17 They had, prior to me asked to being involved, they
18 had identified that truck through a PSTA video. So
19 that's what I did.

20 Q All right. How long would you say that
21 you were looking for this Toyota truck?

22 A It kind of went all day. Like, literally
23 we were trying to go -- I mean think about all the
24 businesses on the Belcher Road. We're literally
25 going -- stopping at every one on the corner trying

1 to see if they have any video trying to see where it
2 actually goes to.

3 Q And how many detectives and/or other
4 officers were involved in surveilling the area and
5 trying to attempt to locate this vehicle?

6 A I mean I can't -- the numbers changed
7 during the day. So I think when I got there
8 originally it was just Officer Wedin doing it and
9 then -- or Detective Wedin and then Detective Sinni
10 and I started helping him as we were working our way
11 northbound.

12 And then by the end of the day I think
13 there was, like, six or seven of us maybe that were
14 trying to find video.

15 Q All right. I think you told me earlier.
16 How many detectives are in the Lake -- Largo Police
17 Department?

18 A So we have four crimes against person
19 detectives and then we have four burglary
20 detectives. But I think we only had three at that
21 time. And then we're supposed to have two fraud
22 detectives.

23 Q All right.

24 A Oh, we have, we have two digital forensics
25 guys that work online crime, online crime

1 investigations.

2 Q Okay. So out of the six or seven
3 individuals that became involved in searching for
4 this vehicle, how many of them were, were detectives
5 as opposed to just officers?

6 A It was all detectives.

7 Q They're all detectives?

8 A Yeah.

9 Q So it would have been four individuals and
10 crimes against persons?

11 A No. They were doing -- I mean they were
12 following up other stuff involved in the incident.
13 I don't remember at what point -- I'm sure at some
14 point they joined up later in the day. I just
15 couldn't say when.

16 Q All right. But six or seven out of the
17 total twelve detectives were involved in the search
18 for this vehicle?

19 A Correct.

20 Q All right. Let me direct your attention
21 to the 511 neighborhood surveillance on March 22nd.
22 Okay?

23 A Okay.

24 Q On the early morning at -- on Wednesday
25 March 22nd, you were requested to assist in a

1 neighborhood surveillance of 511 Seaview Drive,
2 correct?

3 A Specify, like, surveillance. Because I'm
4 not sure exactly what you mean by that.

5 Q To look around, to surveil.

6 A No, we weren't looking to surveil. I mean
7 on March 22nd, which was Wednesday, that was the
8 night -- I don't think we -- we finished off that
9 night, I think we found the truck, Amanda Gay found
10 the truck on a cam, on a Flock camera, going
11 westbound on Klosterman.

12 But it wasn't until March 23rd that we
13 went onto that block of Mr. Kosowski's residence.

14 Q Okay. And who ordered you to go to that
15 neighborhood or to that residence?

16 A So the supervisors at the time -- and it
17 wasn't like an order. It was like that morning we
18 all meet up together and we like, okay, what do we
19 have, what do we need to do this day.

20 And then since we had identified the
21 pickup truck going towards that neighborhood, we
22 decided to -- and this was with the lieutenant,
23 Lieutenant Lamonaco who runs our investigative
24 services division, and Sergeant Caravella who was
25 also with us at the time, we all decided, like, the

1 best thing we could do was see if we could find any
2 video, any surveillance video, of the vehicle in
3 that neighborhood.

4 Q All right. So who would have ordered that
5 or who would have been the individual that directed?

6 A It would have been -- it probably -- I
7 mean I can't recall who directed us to do it. Just
8 it was something that we all with our CAP detectives
9 kind of like running the show said let's go do --
10 let's go see if we can find video. But I couldn't
11 tell you who exactly ordered it.

12 Q All right. And do you know which law
13 enforcement personnel were involved?

14 A I want to say pretty much all the
15 detectives, but I can't say for sure. Like, I think
16 it was all of us were there.

17 Q And when you say all of the detectives,
18 all of the, all of the detectives in this specific
19 division? So, like, all twelve or something
20 different?

21 A Yeah, like all -- yes, all twelve of us.

22 Q All right. And you wrote in your LPD
23 report, "After canvassing the neighborhood I
24 assisted in securing the residence." What do you
25 mean by securing the residence?

1 A We just stayed out in front on the road.
2 Like, we had our vehicles parked on the roadway.
3 Because at that point Detective Compton had found
4 video next door, Mr. Kosowski's neighbor, with the
5 truck going by the front of their house towards his
6 residence. So they had decided to get a search
7 warrant.

8 So literally it was us sitting out in
9 front of the street and then they brought the
10 command bus and set that up. And really they -- we
11 sat out there until they got the search warrant
12 later that evening.

13 Q And who else was involved in securing the
14 residence?

15 A I mean I can't say. Like, we were -- we
16 all stood out there. Like, there was, like,
17 multiple people, multiple -- we had our supervisors,
18 all the detectives were out front as just the time
19 went on because they were trying to get the warrant
20 written and signed.

21 So I mean we were all pretty much out
22 there at that point.

23 Q And when you say you, we, is it just your
24 agency or other agencies involved at this point?

25 A I don't -- at some point I know Tarpon had

1 to come in. Because they were going to -- they were
2 the ones authorized to do the search I think on the
3 warrant.

4 But I was -- I didn't -- I wasn't there
5 for when the warrant was executed. I was asked to
6 go out on the roadway. But up until that point,
7 yeah, it was all of us, which is Largo.

8 Q All right. And I don't mean to be picky.
9 But when you, when you referenced securing the
10 residence in your police report, what specifically
11 was done to secure the residence?

12 A We just didn't want anyone to go in the
13 house. Once it was decided that they were going to
14 get a warrant, we just made sure that no one would
15 go into the home. So we just stood out front.

16 Q And how did you stand out front? If you
17 can be a little more specific. Did you, like, kind
18 of, like, stand in -- I mean what did you do?

19 A Like, we could have been -- like, the cars
20 are parked on the roadway. So, like, no one -- even
21 the neighbors had a hard time getting by. Because
22 there was two or three houses down around the
23 corner.

24 Like, so we had all -- we had the cars out
25 front. The command bus was just past the house to

1 the north right where it turns to go west. Because
2 it dead-ends down there by the park. And then,
3 like, we would just take turns just standing out in
4 front of the house at the driveway just making sure
5 no one would go in.

6 Like, some people -- like, it was getting
7 so late, like, they had ordered food and got pizzas
8 for everybody. So, you know, we would relieve
9 people so someone could go in and get something to
10 eat, you know, in the command bus while other people
11 relieved other ones and stood in front of the house.

12 Q How many officers would you say were
13 standing or would have been standing in front of the
14 house at any given time?

15 A I mean I can't say for sure. I mean I
16 don't know. At least two or three probably.

17 Q And was there Crime Scene tape placed
18 around the perimeter of the house?

19 A I don't recall Crime Scene tape being
20 placed at that time.

21 Q All right. And during, during this
22 timeframe where the residence is being secured and
23 appears from your testimony that you're preventing
24 anyone from going in and out of the residence until
25 a search warrant is obtained. Right?

1 A Correct.

2 Q So prior to obtaining or seeking to obtain
3 a search warrant, did you go on the 511 Seaview
4 Drive property?

5 A I mean I may have been on the driveway. I
6 know the neighbor who had the video, she walked up
7 to us. She took us back.

8 And when I say us, I know it was me and
9 Detective Compton, I think Detective Gay, I don't
10 know who else, but she took us to her back yard and
11 showed us the back of Mr. Kosowski's residence from
12 her yard. But that's really all I can recall. We
13 didn't really go on the property.

14 Q Did you see any other officers go on that
15 property, the 511 Seaview property?

16 A Not that I recall.

17 Q Did you see or did you take any
18 photographs of the 511 Seaview property?

19 A I didn't take any photographs.

20 Q Did you see anyone else within your agency
21 take any photographs?

22 A No, I don't recall anyone taking photos.

23 Q And did you look into the garage?

24 A I don't think you could. I think the
25 windows were too high.

1 Q You think the windows were too high or --

2 A Yeah. If I remember, I think they had,
3 like, these really high windows. So I don't think
4 you could even see into them.

5 Q Did you attempt to look into the garage or
6 see anyone else attempt to?

7 A I don't recall anyone looking into the
8 garage. I don't -- no. I wasn't even able -- you
9 would have to get, like, a bucket or something to
10 get up there.

11 Q Did anyone do that?

12 A No. Not that I recall.

13 Q Did you do that?

14 A No.

15 Q Did you go -- did you search the perimeter
16 of the house or go into the back yard?

17 A No, we never went into the back yard. I
18 know they tried. They walked along -- there's,
19 like, an empty plot I think to the north. And I
20 know they walked along that empty plot to the north.
21 And, but it was just so muddy. I mean it's, like,
22 it's -- they showed me where I think where Detective
23 Allred had tried walking through there and it was
24 just nasty.

25 Q I want to talk to you about the -- were

1 you there for the search of the Toyota Corolla?

2 A When he was stopped by Tarpon?

3 Q Yes, sir.

4 A Yes. I was asked to go out on scene
5 there.

6 Q Okay. Who asked you to go on scene?

7 A That would be Sergeant Caravella.

8 Q And when did you receive that call to go
9 out to the scene?

10 A I can't remember the exact time. It
11 was -- we knew he was heading back. Because he was
12 hitting Flock cameras and Vigilant cameras. So he
13 was showing a pattern of heading back.

14 There. So we had notified Tarpon Springs
15 P.D. to see if they could try to find the vehicle.
16 But I can't remember the time. I wasn't the first
17 one on scene. But by the time I had got there I
18 knew he had already been stopped.

19 Q Okay. So by the time you got on scene, he
20 had already, meaning Dr. Kosowski, had already been
21 stopped. Was he out of his vehicle and being
22 detained at that point?

23 A Yes, he was detained in the back of Tarpon
24 Springs vehicle.

25 Q All right. And where did you park in

1 relation to where the Toyota Corolla was and where
2 Dr. Kosowski was being detained?

3 A I parked -- so the -- if you look at the
4 video from Tarpon Springs, you'll probably see,
5 like, he's facing westbound and -- on that roadway
6 and I'm on the south side of that road.

7 There's an apartment complex I want to say
8 just near his vehicle and I was parked in a parking
9 spot in that parking complex.

10 Q Okay. And what were your instructions for
11 searching the Corolla when it was pulled over at
12 34 --

13 A I didn't do -- I didn't search the
14 Corolla. They got a warrant for it.

15 Q Did you walk around the Corolla or
16 approach the Corolla at any point in time?

17 A I did.

18 Q How close would you say that you got to
19 the Corolla?

20 A I was close enough to where I could see
21 into the trunk and I could see into the passenger
22 compartment of the car.

23 Q Okay. So when you approached the Corolla,
24 the trunk was open was?

25 A It was.

1 Q And was the trunk open when you first
2 arrived on scene?

3 A I can't remember. You're going to have to
4 look at the video. I couldn't say for sure.

5 Q Do you know who opened the trunk of the
6 Corolla?

7 A I don't, huh-uh.

8 Q So when you looked into the trunk, did you
9 see anything of evidentiary value?

10 A You know, I don't remember. There was
11 just a lot -- I remember it being packed with a lot
12 of stuff. But I don't remember, I don't remember
13 seeing anything offhand that was right there in
14 plain view.

15 Q What was, what was being said amongst all
16 of the law enforcement officers on scene? What was
17 kind of the comment, the communications? Because
18 there's groups of you guys kind of, like, standing
19 around. What's the conversations?

20 A I really couldn't tell you anything
21 specific being said. Because it was just a big
22 waiting thing right then and there. I knew they
23 were trying to get some warrants and we were just
24 standing by in case they needed us for anything.

25 I know a lot of us ended up just getting

1 released and leaving. We didn't -- they didn't
2 really need us to do much at that point, so. But I
3 couldn't tell you any specifics.

4 Q Okay. Did you handle any of the items
5 within the trunk?

6 A No, I did not.

7 Q Did you see who closed the trunk?

8 A No, huh-uh.

9 Q So what specifically did you do while you
10 were on scene at 34 Orange Street?

11 A I stood by. I know -- we didn't --
12 Detective Wedin, he's the -- he's doing digital
13 forensics now. I think he had some questions about
14 a phone that they had turned over to him maybe. I'm
15 not -- I don't recall.

16 But I know he was trying to secure
17 something and I think he may have had some questions
18 about a phone. I think that was it. I really
19 didn't do anything else.

20 Q And so was Wedin already there when you
21 arrived?

22 A No, he showed up after me. Because I
23 remember him parking -- he parked on the south side
24 of the road as well. And he couldn't -- I remember
25 he had a hard time finding a parking space at that

1 point. It took him a while. Because he lives
2 farther south than a lot of us do in Pinellas.

3 Q And you indicated he had some questions
4 about some cell phones?

5 A Yeah. Because I know they were
6 securing -- at some point they secured a phone or
7 did something with a phone. I can't, I can't
8 remember. You're going to have to look at his
9 supplement. But it was something about securing a
10 phone he had.

11 Q Did he show you the phones?

12 A Yeah, I think I remember seeing one phone.
13 I can't remember what it was.

14 Q So kind of play that out for me. How does
15 that happen? Are you -- is he presenting a phone in
16 his hands to you and saying, hey, and then asking
17 you questions or something else?

18 A I know at some point a phone was seized
19 and they had to get a warrant later for it. But I
20 think it was, like, he just wanted to confirm, like,
21 do we leave it in airplane, you know, how should we
22 secure this phone, do you want to power it off, do
23 you want to leave it on.

24 So we were kind of just going over,
25 like -- because I used to work digital forensics. I

1 remember us going over, like, the best way to
2 preserve the evidence. It was secured in a bag, in
3 an evidence bag. I just don't -- that's pretty much
4 what I can remember.

5 Q Okay. So the phone was secured in an
6 Evidence bag?

7 A Correct.

8 Q What kind of Evidence bag?

9 A One of our plastic Evidence bags. It's
10 the ones we always use I believe.

11 Q So the same bag that you would, say,
12 collect any other items that were found in this --
13 in this trunk or in the vehicle, use that same type
14 of Evidence bag?

15 A No. Because I -- that was PCSO did handle
16 the -- their Evidence bags I think are different
17 than ours, so. And they ended up doing -- handling
18 the forensics for the car.

19 Q Okay. But it's your testimony that this
20 cell phone was placed in the same type of Evidence
21 bag that you would collect any other type of
22 Evidence?

23 A Yeah. From what I recall, it was just an
24 Evidence bag used to handle evidence.

25 Q All right. And do you know if the phone

1 was manipulated in any other fashion --

2 A No.

3 Q -- prior to being placed into the Evidence
4 bag?

5 A I don't.

6 Q Do you recall whether or not the phone was
7 powered on?

8 A I don't recall.

9 Q Do you recall what kind of phone it was?

10 A I don't, no.

11 Q Was it one phone or more?

12 A I want to say there was two phones, but I
13 can't say for sure. You'd have to go and look back
14 at Detective Wedin's supplements.

15 Q All right. So you were also tasked, it
16 appears from your reports, with drafting several
17 subpoenas?

18 A Correct.

19 Q One to Bank of America. Right?

20 A Yes, yes. Bank of America and then Amazon
21 and Discover I believe.

22 Q So we'll start with the Bank of America.
23 Where did you obtain the Bank of America information
24 from?

25 A So they had -- after they did the search

1 warrant for Mr. Kosowski's vehicle, they had, I
2 guess, gotten the credit cards from either -- it was
3 on him or in the vehicle and Detective Bolton showed
4 me pictures of the cards and asked for me to
5 subpoena the account records for those cards.

6 Q Okay. So we're talking about the Bank of
7 America, Discover. And then Amazon's not a card,
8 right?

9 A No, Amazon's not a card. That was
10 separate.

11 Q So tell me what in your mind or Bolton's
12 mind was the investigative or evidentiary value of
13 subpoenaing the bank records for Bank of America?

14 A They just wanted to see if -- sorry.

15 Q That's okay.

16 A They just wanted to see if there were any
17 purchases made related to the incident. So that's
18 what I did.

19 Q To your knowledge, what was the scope of
20 the subpoena to Bank of America? Meaning timeframe.

21 A You'd have to go back and look. But I
22 think they only -- they went back to, I want to say,
23 October or November of 2022 up to the current date
24 that the subpoenas were drafted.

25 Q All right. Why, why that specific date or

1 month?

2 A Of October.

3 Q Yes.

4 A Or November. Because I think at that
5 point they -- I think it was Detective Sinni. We
6 knew that he had purchased the truck from an
7 individual over on the east coast of Florida. So
8 it's, it's possible that those purchases from the
9 truck would have been on there related some way.

10 Q Okay. And how, how is that relevant to
11 the investigation in your mind?

12 A Because at that point he -- when -- they
13 found the truck in the house. So they knew the
14 truck was related. And the truck had not been
15 registered and you're -- I mean you're going to have
16 to ask Detective Sinni. But he ran down who he
17 purchased the owner from and the owner had given
18 Detective Sinni information on payments.

19 Q So in order to realize or recognize that
20 the vehicle was not registered, what information
21 would you need?

22 A You would have to have the VIN or some
23 other identifying -- the identifying number for the
24 vehicle and check it that way.

25 Q And, to your knowledge, how was the VIN

1 number on that vehicle obtained?

2 A That was during the search warrant of
3 Mr. Kosowski's residence I believe.

4 Q All right. The Discover, Discover card --

5 A Discover card.

6 Q Yes. What, what was the relevancy -- let
7 me ask you this first. What was the scope of the
8 subpoena for the Discover card?

9 A Same thing. You just -- I mean you don't
10 know which purchases, which bank he used to make the
11 purchases on.

12 Q The purchases of what? The vehicle?

13 A Yeah. If the vehicle or anything else
14 related to the crime.

15 Q What -- at that point in time when you,
16 when you obtained these subpoenas, what did you
17 believe in your mind to be relevant purchases?

18 A The main thing is the vehicle or anything
19 else he had purchased -- I mean I don't know. I
20 mean that's why you subpoena the records to see.

21 Q All right. Then you also were involved in
22 obtaining a subpoena for Amazon as well?

23 A Yes.

24 Q And, again, what was the relevancy of
25 that?

1 A Same thing. We -- I think they had
2 identified the cart. So the cart that was in the
3 back of the truck. And I don't know if you can
4 purchase it off of anywhere else. But I know it was
5 found on Amazon. And there were Amazon -- subpoenas
6 for his Amazon records.

7 Q All right. So when, when was the cart,
8 according to you, the cart that was identified in
9 the back of the truck, when was that identification
10 as to the specific type of cart that was in the back
11 of that truck made?

12 A I don't know. I didn't, I didn't make
13 that identification. I couldn't tell you.

14 Q Do you know what kind of cart was alleged
15 to be in the back of that truck?

16 A Yeah. If I can look at my supplement. I
17 actually listed -- I think I listed the transaction
18 in there. Let me see.

19 Here we go. A Gorilla cart. It's a
20 seven-cubic-feet foldable collapsible turbo
21 all-terrain utility beach wagon was what it was
22 identified as.

23 Q And so you were, you were heavily involved
24 it appears for that one day of tracking down this
25 Toyota truck.

1 Were you able or was anyone involved in
2 tracking down that vehicle able to make that
3 specific identification as to what kind of cart was
4 in the back of that truck?

5 A I don't, I don't know if they said that
6 was the exact, like, make and model. But there was
7 something specific about the handle, the way the
8 handle was shaped on the cart.

9 So they started looking for, like, similar
10 ones and they found it on Amazon. It had, like, the
11 same holders in the four corners, the way the -- the
12 color, the way the handle was designed.

13 Q And who is the one that was looking for
14 that cart? Was it you or someone else in your team?

15 A I think there was, like, several of us
16 trying to identify the cart. I can't say who else
17 was.

18 Q And you didn't speak with Marc Otto, did
19 you?

20 Detective?

21 A What's that?

22 Q You're frozen. Oh, you froze there for a
23 second. Can you hear me now?

24 A Yeah, I can hear you.

25 Q Okay. Did you -- you didn't speak with

1 Marc Otto, correct?

2 A No, I did not. Detective Sinni
3 interviewed him.

4 Q That's what I thought. I just want to
5 make sure. And you weren't involved in that
6 interview?

7 A No, I was not.

8 Q Is there anything else other than I guess
9 you were tasked with also going to the Collier
10 County Landfill and -- well, let me ask about that.
11 Tell me what you did there.

12 A I spent two days down there. I relieved
13 the first group that went down. They had been there
14 for the original search on Tamiami Trail and then
15 the first day of searching the landfill and then me
16 and another group of detectives went down and
17 finished up the search at the landfill before they
18 ended it.

19 Q Okay. Were you present when the truck
20 driver was interviewed at the landfill?

21 A I was there. I didn't -- I don't remember
22 hearing exactly what he said. I know -- I think it
23 was Detective Wedin that interviewed him.

24 Q Okay. Did you do anything else?

25 A Not that I recall.

1 MS. TUOMEY: Okay. Those are all the
2 questions I have for you. I don't know if the
3 State has any questions or Mr. Brunvand has any
4 questions.

5 And then you are going to have to decide
6 whether you want to read or waive. So thank
7 you.

8 THE WITNESS: All right. I'll read.

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

11 MS. SPADARO: No questions.

12 MS. TUOMEY: Thank you, sir.

13 (The deposition was concluded at 10:10
14 a.m.)
15
16
17
18
19
20
21
22
23
24
25

ERRATA SHEET

DO NOT WRITE ON TRANSCRIPT -- ENTER CHANGES HERE

IN RE: STATE OF FLORIDA VERSUS TOMASZ KOSOWSKI

DATE TAKEN: SEPTEMBER 12, 2023

REPORTER: TAMMY KELLEY

PAGE NO.	LINE NO.	CHANGE	REASON
----------	----------	--------	--------

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.

LANCE WAGONER

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF POLK)

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

WITNESS my hand and official seal this 3rd
day of January 2025.

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 LANCE WAGONER, 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 3rd day of January 2025.



TAMMY KELLEY

January 3, 2025

Mr. Lance Wagoner
lwagoner@largo.com

Dear Mr. Wagoner:

Your deposition taken in State of Florida versus Tomasz Kosowski on September 12, 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.

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,

