

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 DETECTIVE ANDREW WARWICK, TSPD

DATE: May 9th, 2024

TIME: 9:59 a.m.

PLACE: Various Remote Locations  
Via Zoom Video Communications

REPORTER: KIMBERLY L. RENFROE, RPR

VIRTUAL  
APPEARANCES:

NATHAN T. VONDERHEIDE, ESQUIRE  
Assistant State Attorney  
Post Office Box 17500  
Clearwater, Florida 33762  
For the State

BJORN E. BRUNVAND, ESQUIRE  
Brunvand Wise, P.A.  
615 Turner Street  
Clearwater, Florida 33756  
For the Defendant

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May 9, 2024

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## 1 DEPOSITION IN DISCOVERY

2 DETECTIVE ANDREW WARWICK, TSPD

3 Pursuant to notice duly given, the virtual  
4 deposition of DETECTIVE ANDREW WARWICK, TSPD, called by  
5 the Defendant in the above-styled cause, was taken by  
6 me, a Notary Public in and for the State of Florida at  
7 Large, at the time and place and in the virtual presence  
8 of counsel 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 DETECTIVE ANDREW WARWICK,  
12 TSPD, that signature to the said deposition be reserved.

13 THE COURT REPORTER: Would you raise your  
14 right hand for me, 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 THE COURT REPORTER: Thank you.

20 DETECTIVE ANDREW WARWICK, TSPD, having been first  
21 duly sworn via Zoom Video Communications, upon  
22 interrogation in discovery, testified as follows:

## 23 DIRECT EXAMINATION

24 BY MR. BRUNVAND:

25 Q. My name is Bjorn Brunvand. I represent

1 Tomasz Kosowski. We're here on State of Florida versus  
2 Tomasz Kosowski.

3 If you could please state your name.

4 A. Detective Andrew Warwick.

5 Q. And, Detective, how are employed?

6 A. City of Tarpon Springs Police Department.

7 Q. And how long have you been so employed?

8 A. Since May 5th of 2005.

9 Q. And how long have you been a detective with  
10 the Tarpon Springs Police Department?

11 A. A little over two years.

12 Q. Okay. And do you focus on any particular type  
13 of -- of -- of cases?

14 A. I do not. We're a smaller unit. We divvy up  
15 assignments based on who's available.

16 Q. Okay. Did you prepare a -- any reports  
17 detailing your involvement in this particular case?

18 A. I did not.

19 Q. Okay.

20 Can you tell us when you first became involved in  
21 this case?

22 A. I was notified to do some background  
23 information on your client, the -- the day that the  
24 search warrant was served on his residence.

25 Q. And do you recall what day that was?

1           A.    I do not recall in front of me -- I don't have  
2   it in front of me, I'm sorry.

3           Q.    Do you -- do you have anything you can  
4   reference?

5           A.    No.

6           Q.    If I -- if I suggest to you that it was  
7   March 23rd, does that sound accurate?

8           A.    It sounds accurate. Let me just check real  
9   quick. I'm sorry.

10          Q.    Yeah. You could -- you -- feel free to  
11   reference your -- you know, any -- any reports that you  
12   have access to.

13          And I'm assuming the reports you have access to  
14   would be the Tarpon Spring Police Department reports?

15          A.    That is correct, sir.

16          Q.    Not -- not Largo Police Department reports?

17          A.    I do not have any Largo Police Department  
18   reports.

19          Yeah, it appears March 23rd of 2023.

20          Q.    Okay. And you'd indicated that someone from  
21   Largo Police Department had reached out to you?

22          A.    No, my administration did.

23          Q.    Your administration. Okay.

24          Who -- who in your administration reached out to  
25   you?

1           A.     That would be Detective Sergeant Crawford;  
2     he's a major now.

3           Q.     And what did Major Crawford indicate to you  
4     when -- when he reached out to you?

5           A.     Indicated that we were going -- or that we  
6     were going to assist Largo Police on a search warrant at  
7     the -- at your client's residence and just requested I  
8     do some background information on the residence.

9           Q.     Okay. And what kind of background information  
10    were you requested to -- to --

11          A.     I obtained open-source photos from public  
12    sites just on the dimensions of the house and, I  
13    believe, pictures from like Realtor.com and Zillow.

14          Q.     Okay. So just to get an idea of what -- what  
15    the property looked like?

16          A.     Yes, sir.

17          Q.     Okay. Anything else other than obtaining  
18    publicly available photographs?

19          A.     No, sir.

20          Q.     And did you preserve those photographs that  
21    you obtained?

22          A.     I do not believe so.

23          Q.     Okay. And what did you do with them?

24          A.     They were just on -- online. I didn't print  
25    anything out, I don't believe.

1 Q. Did you share the -- like, show it to anyone  
2 or did you just look at it yourself?

3 A. I showed it to Sergeant Crawford.

4 Q. Okay. All right.

5 Did you have any contact with anyone from Largo  
6 Police Department regarding the assistance?

7 A. Nothing of -- I -- you know, we made contact  
8 with Largo at the residence but I didn't speak to  
9 anybody in particular.

10 Q. Prior to arriving at the residence.

11 A. No, sir.

12 Q. All right.

13 So, any other information that you recall as far as  
14 what -- what was provided to you by -- by the Ma --  
15 by -- by Major Crawford other than what we discussed?

16 A. No, sir.

17 Q. Okay.

18 Do you recall if the photographs that you viewed  
19 online included photographs of the backyard of the  
20 property?

21 A. I do not recall that, sir.

22 Q. All right.

23 Do you recall at -- at any time, either in  
24 preparation for the search warrant or when you arrived  
25 at the scene to assist with the search warrant, do you



1 recall any member of law enforcement showing you photos  
2 of the property?

3 A. Showing me photos of the property? No, I  
4 don't believe so, sir.

5 Q. Okay. And, specifically, anyone maybe showing  
6 you photos of the property that was taken on their -- on  
7 their cell phones?

8 A. No. I don't recall that, sir.

9 Q. Okay.

10 Do you recall whether or not the SWAT team was used  
11 for the initial entry into 511 Seaview?

12 A. They were.

13 Q. Okay. And -- and I -- you mentioned my -- my  
14 client's property. Are -- are you familiar with the  
15 fact that 511 Seaview was -- was the address of my  
16 client's property?

17 A. Yes.

18 Q. Okay.

19 Do you know who decided to use the SWAT team to  
20 enter the property and anything about that?

21 A. I do not, sir.

22 Q. Who would normally make that decision, if you  
23 know?

24 A. Major Trill was the SWAT commander at the  
25 time.

1 Q. Okay.

2 Would the SWAT commander make it or would someone  
3 reach out to him and ask that they participate?

4 A. Being Largo's case, I'm -- I'm assuming, I --  
5 I can't speak to it, I'm not a member of the SWAT team,  
6 that they would contact our administration.

7 Q. Okay.

8 Were you advised us to whether or not Kosowski was  
9 believed to be home at the time that the search was to  
10 being executed?

11 A. I was told that there was a good possibility  
12 that he was not home.

13 Q. Okay.

14 Specifically, were you told anything more as to why  
15 it was believed he was not home?

16 A. No, sir.

17 Q. Okay.

18 Was there any discussions during -- prior to  
19 executing the search warrant, reference a Toyota truck?

20 A. Not to me, sir.

21 Q. Okay.

22 Was there any discussion with you about a Toyota  
23 truck at any time during the search and after the  
24 search?

25 A. I know there was one at the residence.

1           Q.    Okay.  Do you know anything about who owned  
2   the truck?

3           A.    I do not, sir.

4           Q.    Okay.

5           Do you know anything about the truck other than the  
6   fact that it was at the residence?

7           A.    No, sir.

8           Q.    Did you have possession of the actual search  
9   warrant for 511 Seaview?

10          A.    No, sir.

11          Q.    Do you know who did?

12          A.    I believe Detective Melton.

13          Q.    And -- and Detective Melton with Tarpon  
14   Springs Police Department?

15          A.    Yes, sir.

16          Q.    Okay.

17          Were you present when -- when the search warrant  
18   was read?

19          A.    I -- I do not recall that, sir.

20          Q.    Okay.

21          Do you have any information as to when the search  
22   warrant may have been signed by Judge Federico?

23          A.    I have no idea, sir.

24          Q.    Would your reports that you have access to,  
25   are you able to tell us who was present from Tarpon

1 Springs Police Department the night in question?

2 A. I know myself, Detective Melton,  
3 Detective Miller, Sergeant Crawford, I -- I mean, I know  
4 members of the SWAT team but I don't recall exactly who  
5 was there.

6 Q. Okay.

7 The SWAT team, once they entered and -- and secured  
8 the residence, did -- did the SWAT team have any  
9 involvement in the actual search?

10 A. I don't know, sir. I did not have any  
11 involvement with the search.

12 Q. Okay. And -- and -- and I just want to make  
13 sure I understand. You -- you don't know if the members  
14 of the SWAT team had involvement in the search?

15 A. No, sir.

16 Q. Okay.

17 And you -- and you said that you had no involvement  
18 in the search?

19 A. I had no involvement in the search, sir.

20 Q. Okay.

21 And what were your responsibilities?

22 A. I covered the northeast corner of the property  
23 when the SWAT team made entry.

24 Q. Okay. The northeast corner. Okay.

25 So that's -- that's -- is that closest to the Fred

1 Howard Park area of the property?

2 A. Yes, sir. It's -- it's on the roadway closest  
3 to Fred Howard Park.

4 Q. It's right -- it's -- it's basically where the  
5 road turns from north-south to east-west?

6 A. That is correct, sir.

7 Q. Okay.

8 And do you recall where you were positioned at that  
9 time?

10 A. On the grass directly by the roadway.

11 Q. Okay.

12 Do you recall the time that you were positioned  
13 there?

14 A. It was dark and don't recall the exact time.

15 Q. Would -- would it -- is there anything that  
16 you have access to that might give you a little bit more  
17 specificity as to the time?

18 A. Yeah, I'm reviewing that right now.

19 Q. Okay. Take your time.

20 And when you're looking through that, if you  
21 could -- see if you can identify the time that you  
22 arrived and the time that you left.

23 A. Give me just a moment to access another  
24 system.

25 Q. Absolutely. Take your time.

1           A.     According to our CAD notes, I arrived on scene  
2     at 2246 hours, and I cleared at 0211 hours.

3           Q.     Okay. So shortly before 11:00 you arrived,  
4     and shortly after 2:00 a. -- a.m. you left.

5           A.     That is correct.

6           Q.     Okay. Did you have any involvement in --  
7     in -- in drafting the search warrant affidavit or  
8     obtaining the search warrant affidavit?

9           A.     No, sir.

10          Q.     Okay.  
11          Did you have any involvement in -- in maintaining a  
12     search warrant inventory?

13          A.     No, sir.

14          Q.     Do you have any information about whether or  
15     not a search warrant inventory was left at the home upon  
16     the completion of the search?

17          A.     I do not, no, sir.

18          Q.     And that's because you had indicated that you  
19     had no involvement in the search; is that accurate?

20          A.     That is accurate.

21          Q.     So I believe you're -- I'm -- the -- based on  
22     the times that you were there, that the search itself  
23     had started prior to you leaving the scene.

24          A.     Yes.

25          Q.     Okay. So what were you doing when the sear --

1 because you had indicated that you had -- you maintained  
2 the perimeter of the northeast corner during the SWAT  
3 entry; what were you doing after the SWAT had exited and  
4 the search had started?

5 A. I was outside the entire time. Nothing of --  
6 nothing of note, sir.

7 Q. Okay. In the same general area or -- or some  
8 other area?

9 A. In front of the residence.

10 Q. Okay.

11 Do you recall who else was there with you in front  
12 of the residence?

13 A. I know Detective Melton was there for a while;  
14 Largo detectives that I do not know their names.

15 Q. Okay.

16 A. I spoke to Sergeant Crawford. That's all I  
17 can recall.

18 Q. Okay.

19 And do I understand correctly you -- you never  
20 entered the home?

21 A. I never did, sir.

22 Q. And so, if -- I'm assuming you would have no  
23 opinions on the significance of any items that were  
24 taken during the search.

25 A. That is correct, sir.

1 Q. Was the garage door open when you were outside  
2 the -- the home?

3 A. Not initially.

4 Q. Okay. But -- but during the time period that  
5 you were there, before you left, was there a period of  
6 time when the garage door was open?

7 A. Yes.

8 Q. Okay. Can you estimate how long of a time  
9 period that was?

10 A. No, sir.

11 Q. Okay.

12 Do you recall whether or not any of the detectives,  
13 either from Largo Police Department or from Tarpon  
14 Springs Police Department, were wearing like protective  
15 footwear as they were walking in and out of the  
16 property?

17 A. I don't recall that, sir.

18 Q. Okay.

19 Do you recall seeing a Toyota Tundra truck in -- in  
20 the garage from the outside?

21 A. Yes, sir.

22 Q. Were you there when the Toyota Tundra was  
23 loaded onto a tow truck?

24 A. I was not.

25 Q. Okay.



1           So was the Toyota Tundra in the garage the whole  
2 time you were there?

3           A.    Yes, sir.

4           Q.    Do you have any contact with ASA Alex Spadaro  
5 during the time in question?

6           A.    No.

7           Q.    You do know who she is, right?

8           A.    I do not. But I didn't have any contact with  
9 any attorneys that night.

10          Q.    Okay.

11          Do you recall whether or not Largo Police  
12 Department was at the scene of 511 Seaview when you  
13 arrived?

14          A.    Yes, they were.

15          Q.    Okay. Do you know how many members of Largo  
16 Police Department were there when you arrived?

17          A.    I do not.

18          Q.    Okay.

19          And I think you indicated that you did not speak  
20 with anyone from the State Attorney's Office regarding  
21 the search.

22          A.    That is correct.

23          Q.    I believe you had indicated that you don't  
24 recall being present or hearing the search warrant being  
25 read.

1           A.     That is correct.

2           Q.     And that you also said you did -- do not  
3 recall specifically when the garage door was opened.

4           A.     That is correct, sir.

5           Q.     Do you know -- can you give an estimate as to  
6 when it was opened as it relates to when the search  
7 started?

8           A.     I cannot, sir.

9           Q.     Okay. Could it have been opened prior to the  
10 search starting?

11          A.     I don't know, sir.

12          Q.     Okay.

13          Okay. Is there anything else that you did in this  
14 case that we have not discussed here today?

15          A.     No, sir.

16          Q.     Okay.

17                 MR. BRUNVAND: I don't have any other  
18 questions.

19                 MR. VONDERHEIDE: No questions from me.

20                 MR. BRUNVAND: Okay.

21                 Detective, you're familiar with reading or  
22 waiving the reading of the transcript?

23                 THE WITNESS: Yes, sir; I would like to read.

24                 MR. BRUNVAND: Okay. Very good.

25                 So I'm going to turn off the recording and

1           then the court reporter's going to want to get  
2           contact information for you so that she can send  
3           you the transcript.

4                   (Discussion off the record.)

5  
6                   (THEREUPON, the virtual deposition concluded  
7           at 10:23 a.m.)

## ERRATA SHEET

IN RE: State of Florida versus Tomasz Kosowski

DATE TAKEN: May 9, 2024

WITNESS: DETECTIVE ANDREW WARWICK, TSPD

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 (DETECTIVE ANDREW WARWICK, TSPD)

CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF PINELLAS

I, the undersigned authority, certify that  
DETECTIVE ANDREW WARWICK, TSPD personally appeared  
before me via Zoom Video Communications on May 9, 2024  
and was duly sworn.

Witness my hand and official seal this 7th  
day of June, 2024.

  
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 DETECTIVE ANDREW WARWICK, TSPD; that a review of the  
8 transcript was not requested; and that the transcript is  
9 a true and 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 7th day of June, 2024.

16  
17   
18 KIMBERLY L. RENFROE, RPR

19  
20  
21 (Transcript was ordered by Bjorn E. Brunvand,  
22 Esquire, on May 9, 2024.)  
23  
24  
25

June 7, 2024

Detective Andrew Warwick, TSPD  
xxxxxxxxxxxxxxxx.xx

Dear Detective Warwick:

Your deposition taken in the case of State of Florida versus Tomasz Kosowski on May 9, 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 July 12, 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