

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

CASE NO.: 23-02935-CF

STATE OF FLORIDA,

Plaintiff,

vs.

TOMASZ KOSOWSKI,

Defendant.

VIDEOCONFERENCE

DEPOSITION OF: DANA ZUCHETTO

DATE TAKEN: April 15, 2024

TIME: 3:53 p.m. to 4:24 p.m.

PLACE: Via Zoom videoconference

STENOGRAPHICALLY REPORTED BY:

Lori A. Seiden, RPR, FPR-C

Notary Public, State of Florida at Large

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C O N T E N T S

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EXHIBITS	NONE

1 Alexandra Spadaro. So there's three attorneys, one
2 court reporter; okay?

3 A. Okay. Yep.

4 Q. All right. Excellent.

5 So before we get started, I just wanted to ask,
6 do you consent to this deposition being recorded on
7 audio and video?

8 A. Yeah, that's fine.

9 Q. Okay. Cool. Because I just didn't want you to
10 be blindsided when I hit the record button. I always
11 want to ask first.

12 A. Oh, okay.

13 Q. Yeah. All right. We're going to go ahead and
14 get started. I'm going to hit record; okay?

15 A. Okay.

16 Q. All right. So Ms. Zuchetto, can you please
17 state your first and last name, and spell your last name
18 for the record?

19 A. My name is Dana Zuchetto. My last name is
20 spelled Z-u-c-h-e-t-t-o.

21 Q. And, Ms. Zuchetto, where do you work?

22 A. I work in the forensic sciences division at the
23 Pinellas County Sheriff's Office.

24 Q. All right. And how long have you worked at the
25 forensic science division for the Pinellas County

1 Sheriff's Office?

2 A. 20 years.

3 Q. All right. During your 20-year tenure with the
4 forensic science division at PCSO, what positions have
5 you held?

6 A. That's the only position I've held is forensic
7 science specialist with them.

8 Q. Okay. And have you held, you know, any
9 supervisory positions, or has it been forensic
10 specialist the whole time?

11 A. I've been a forensic specialist for my entire
12 career there.

13 Q. Okay. Thank you.

14 And, Ms. Zuchetto, did you write a report or a
15 supplemental report connected to this case?

16 A. I did.

17 Q. Okay. And I'm looking here and it appears to
18 be Supplement 13; is that correct?

19 A. That is correct.

20 Q. Okay. And have you had a chance to review this
21 Supplement 13 prior to this deposition this afternoon?

22 A. Yeah. I looked it over, yeah, over the
23 weekend.

24 Q. Okay.

25 A. I don't know what day it is. Today is Monday.

1 So, yeah, it would have been, like, Friday, Saturday I
2 took a look at it.

3 Q. All right. Sounds good.

4 Are there any changes or additions or
5 corrections that you need to make to the supplement?

6 A. Not that I'm aware of.

7 Q. Okay. So as we sit here, you don't have
8 anything to add to the supplement; it's full and
9 complete at this point?

10 A. Yes.

11 Q. Okay. So how did you become involved in this
12 case?

13 A. I was requested to respond to Mr. Kosowski's
14 residence while a search warrant was executed, and I
15 took some photographs and made a few collections.

16 Q. Okay. And so, when you responded to the
17 residence -- and the residence that I'm referring to is
18 511 Seaview Drive; is that correct?

19 A. Yes, 511 Seaview Drive.

20 Q. All right. And so, when you responded to the
21 residence, what did you observe?

22 A. At the time, at the residence we met with the
23 detectives and the SWAT team. They were doing, like, a
24 SWAT servant -- serving the warrant -- not SWAT. There
25 was a team serving the warrant on the residence and

1 clearing it before we entered. And then we went in and
2 began taking photographs and collecting evidence.

3 Q. Okay. And so, when you had the opportunity to
4 enter the residence, where was the first area that you
5 went to?

6 A. The garage.

7 Q. Okay. And what did you observe in the garage?

8 A. There was a -- there were vehicles -- a vehicle
9 parked in there; a truck I believe it was, a pickup
10 truck. There were various other items. It was a large
11 garage. There was a lot of items in the garage, but
12 particularly of interest at that time was the vehicle
13 right inside the garage or the truck. I later did
14 photos, overall photos, throughout the garage and also a
15 trailer that was inside the garage. I believe there was
16 a motorcycle --

17 Q. Okay.

18 A. -- but I would have to refer to the photos to
19 tell you everything. There was a lot of items in this
20 garage. It was large.

21 Q. Thank you. I appreciate it.

22 And as far as processing is concerned, did you
23 process or assist in processing the pickup truck that
24 you just mentioned?

25 A. I did collect a couple swabs from it.

1 Q. Okay.

2 A. I did a -- I believe it's -- I know -- I
3 believe it was a touch DNA swab from the tailgate area.
4 It was a Toyota Tundra. I'm sorry. It was the interior
5 side of the exterior tailgate handle is what I did the
6 touch DNA swab on. And then I also took a possible
7 blood sample from the interior of the tailgate.

8 Q. All right. And so, that's all you did as far
9 as collecting samples from the Tundra?

10 A. Correct.

11 Q. Okay. And then did you take photographs of the
12 Tundra as well, like the overall photographs that you
13 mentioned?

14 A. I believe the -- I would have to look for the
15 photos, but initially I was just taking some 360 photos
16 with our OSCR360 camera. I believe -- I don't
17 believe -- you know, honestly without looking at the
18 photographs, I can't remember if the truck had been
19 towed out of there yet or not. But the truck was then
20 towed to, I believe it was our -- one of our facilities.
21 It was towed out of the garage, and then I -- when I did
22 take digital photographs with my regular digital camera
23 in the garage, the truck was not in there at the time.

24 Q. Okay. So in your report there is a mention of
25 building a property label. It says that you built the

1 property label for the vehicle in ASIS and retained
2 chain of custody. It's at the bottom of the second
3 paragraph.

4 A. Sorry. This is a long report.

5 Yes, our lieutenant is the one that escorted
6 it, but I built it -- just built the vehicle in ASIS.

7 Q. Okay. And what is ASIS? Like, what is that?

8 A. It's our computerized report writing and
9 property and evidence. That's the system that we use to
10 build property as well as do our reports.

11 Q. Okay. And so, when you say "build property,"
12 you're essentially, like, building a profile, I guess,
13 for this particular piece of property in ASIS?

14 A. It's just -- yeah, it's just documenting that
15 it's in our system, because our lieutenant then followed
16 the vehicle, escorted it back to our garage, then other
17 specialists would then later process the vehicle.

18 Q. Okay. And so, is that the chain of custody
19 that you're referring to? Like, all those additional
20 steps that were taken would be documented, essentially,
21 in ASIS?

22 A. It just shows -- yes, because in the property
23 reports then it shows that the vehicle was built and,
24 then it will be like -- it will have to be released by
25 somebody else. But there will be photographs from each,

1 and the photographs will be built as -- for each -- for
2 whoever did photograph and process the vehicle at the
3 garage.

4 Q. Okay. So then -- sorry. Go ahead.

5 A. At our garage, I meant. I didn't mean in his
6 garage. I meant in our garage in our facility.

7 Q. Right. Your facility.

8 And so, then, essentially, whoever did that
9 task, like, take the photographs, would then be
10 associated with that particular task and that
11 particular, I guess, chain in the custody chain?

12 A. So every time we -- like, every time we,
13 like -- so whoever did photographs of the truck at our
14 garage, they would have to build an evidence label for
15 the photo that would encompass the photographs that they
16 took. So each time -- like, at this -- at this
17 particular scene, I did the OSCR360, so I built a label
18 in the system for the OSCR360, which was then submitted
19 to the photo lab, as well as I did take -- later take
20 digital photos inside the residence and then garage, and
21 that I built a separate label for. And that was also
22 given to -- you know, submitted to property with my
23 disk.

24 Q. Okay. And so, who initially received the
25 Tundra at impound, like at the impound garage?

1 A. I don't know. I was not there.

2 Q. Okay. Did anyone from Tarpon Springs PD or
3 Largo PD accompany Lieutenant Gross when he escorted the
4 tow truck to the forensic processing garage?

5 A. I'm not aware. I do not know.

6 Q. All right. So you mentioned in your report,
7 specifically the second full paragraph of your report,
8 that you tested a sample of -- you collected a sample of
9 an unknown reddish-colored substance, and then you
10 tested a sample of that substance for the presence of
11 blood utilizing the phenolphthalein?

12 A. Yes.

13 Q. Okay. So you said that you obtained a positive
14 result for blood in the tailgate of the truck.

15 What analysis did you use?

16 A. I used the three-step phenolphthalein test,
17 which is also -- it's a presumptive test, so it's not
18 the end-all, be-all. Once I collected the swab, I
19 tested a sample from the swab, I submitted that. It
20 will have to get sent to a lab for any further analysis.
21 Phenolphthalein is a presumptive test for blood, and
22 it's not species specific. So in order to get any
23 further analysis, it has to be sent to another lab.

24 Q. All right. And so, as far as the positive
25 quality control test that you reference in your report,

1 can you please describe how that's done?

2 A. I take -- yeah. I take two swabs. One I put
3 a -- we have a test sample, and I put the -- I use the
4 test sample and then I test one empty swab, one clean
5 swab, and one with the test sample, and I use the
6 chemicals on that. And at that time, I obtained a
7 positive result where I used the sample chemical or
8 samples -- blood sample for the tester, and on the other
9 one I did not receive a positive result. It's just to
10 show if there's a positive or negative -- you know, that
11 it appears the chemicals are working.

12 Q. Okay. And did you do a positive quality
13 control test prior to testing the samples that you
14 collected from the Tundra?

15 A. Yes, I did.

16 Q. Okay. Is there a negative quality control test
17 for phenolphthalein?

18 A. Yes, that's the clean swab, that we just use a
19 clean swab with nothing out of the sterile -- sterile
20 swab out of the package, and we add the chemicals to it,
21 and if there's a reaction, then obviously that's a false
22 positive because --

23 Q. There's no sample there?

24 A. There's no sample there, correct.

25 Q. Okay. So that would be a negative quality

1 control test; okay?

2 A. Yes.

3 Q. And so, the -- was there any negative quality
4 control test prior to testing the samples you collected
5 from the Tundra?

6 A. No, I only -- we only test the set once. We do
7 it once with no sample on the swab and one sterile swab
8 with an actual sample of -- from our sample kit. And I
9 did one on each, and they were both -- the clean swab
10 was negative and the other swab was positive.

11 Q. All right.

12 A. So it's only done one time before we use the
13 kit, like, each day.

14 Q. Understood.

15 Are there any other agents, to your knowledge,
16 that can give a positive phenolphthalein result that
17 isn't one?

18 A. Not off the top of my head, but I've been in
19 the -- when I was going through classes, I recall them
20 telling us that it's often -- you're more likely to get
21 a false negative than a false positive.

22 Q. Okay.

23 A. But, again, once we do the -- we don't really
24 know the final outcome unless we look up lab results,
25 because, again, it's a presumptive. And before

1 there's -- you know, once we do the presumptive and
2 submit it to the property and evidence, and then it's up
3 to the case agent to decide what samples will go to the
4 lab. And those -- then they are further tested to
5 actually see if there's a DNA profile. If it's
6 confirmed that's it's human blood, you know, what
7 human's blood it belongs to, that all has to be done in
8 a lab.

9 Q. Understood.

10 What about any other agents in the back of the
11 pickup truck or the tailgate? You know, could any of
12 those provide a false positive result?

13 A. I've never had that happen that I know of.

14 Q. Okay.

15 A. I only did the one sample in the tailgate. I
16 didn't take multiple samples. I just saw a
17 reddish-color substance and that's the only area I
18 tested in that vehicle.

19 Q. All right. And then you mentioned taking the
20 photographs with the OSCR360 camera kit?

21 A. Yes.

22 Q. Okay. And so, did -- as far as the scope of
23 the photography using the OSCR360, was that the entire
24 residence that you took photos of?

25 A. Primarily, yes -- let me be exact -- but it's

1 not like anything close-up. It's just a general 360
2 scan of the room. So I did, like -- let me see if I
3 listed -- I don't think I listed exactly separately out
4 each area I did it in. To my knowledge, I did -- I
5 covered most of the rooms inside the residence, I
6 believe.

7 Q. Okay.

8 A. Yeah, I'd have to look at the photos to confirm
9 it, but...

10 Q. Right.

11 And then you also noted that you took some
12 photographs of some license plates?

13 A. Yes.

14 Q. Okay. And so, you also collected those license
15 plates as well?

16 A. I did.

17 Q. And also various items in the middle of the
18 garage area?

19 A. Of the photographed?

20 Q. Right. So you --

21 A. Correct.

22 Q. -- mentioned a soft-sided open trunk storage
23 container that was located near the middle of the garage
24 with multiple items in it?

25 A. Yes.

1 Q. Right.

2 And so, you collected the items from that
3 particular location, or no?

4 A. No, I did not. The only items I collected from
5 the scene were the license plates, the blood sample we
6 discussed, and the touch DNA swab that I took from the
7 truck. Other than that, I didn't collect anything else
8 from the residence.

9 Q. Okay. So you photographed those areas --

10 A. I did.

11 Q. Okay. Besides the areas that you -- okay.
12 That makes sense.

13 So you collected and photographed those other
14 areas?

15 A. Yes.

16 Q. Okay. Okay. So there is a portion in your
17 report, you know, as you're going through your
18 involvement here, where you indicated that there was --
19 that you tested two areas of reddish staining on the
20 garage floor?

21 A. Yes.

22 Q. Okay. What is the significance of having a
23 negative phenolphthalein test for those areas?

24 A. There was a reddish-colored substance on the
25 floor. And, again, without testing it, we don't know if

1 it's going to be -- could be blood or could be anything
2 else -- paint. Could be nail polish. It could be just
3 some reddish-colored drink that got spilled. We don't
4 know. So there were some visible areas. I tested them,
5 they came back negative.

6 Q. Okay.

7 A. There was also -- so that was -- I also tested
8 a Bowie knife as well that was found in the closet in
9 the garage that was also negative. Then they had me do
10 a blind swab on a tactical backpack that was located in
11 the --

12 Q. Go ahead.

13 A. I'm sorry. It's cut out a little bit.

14 Q. You're fine. Just go ahead and finish your
15 sentence about where the tactical backpack was located
16 and I'll ask a question.

17 A. It was a blind swab on a black tactical
18 backpack in the southwest bedroom.

19 Q. Okay. What is a blind swab?

20 A. A blind swab is just when you swab to see --
21 you don't see a stain but you just swab something to see
22 if you can -- if there is anything there. I didn't
23 observe anything in particular. Could have been a
24 darkened area, but, like, I did not actually see a
25 reddish color.

1 Q. Okay. So going back to the Bowie knife that
2 was tested and then the areas on the garage floor that
3 were tested, those reddish areas that I referred to
4 earlier, is -- you know, you said that you tested those
5 using the phenolphthalein and it was a negative result
6 for both -- like, for all three of those areas?

7 A. Mm-hmm.

8 Q. So is phenolphthalein subject to false negative
9 results in your experience?

10 A. I haven't had any experience with it, but I
11 know it can happen. It's just -- but I've never had it
12 happen that I'm aware of.

13 Q. And so, that blind -- so right now, like, in
14 your involvement, we're talking about that blind swab.
15 And thank you for clarifying what a blind swab is.

16 As far as, you know, I see in your report that
17 you mentioned that you continued to document areas and
18 items in the main living space. So when you say
19 "document," you're talking about photographing those
20 areas; right?

21 A. Correct, yes.

22 Q. Okay. And so, once the search of the residence
23 and the garage was completed, you note in your report
24 that you and also Forensic Specialist King covered the
25 windows and doors inside the garage to block out any

1 light from outside, and then Forensic Specialist King
2 applied luminol to the garage floor area?

3 A. Yes, she did.

4 Q. So I'll ask you about that. Sorry?

5 A. I'm sorry. Just dry throat.

6 Q. That's okay. No problem. No problem. You
7 want to take another moment to get a sip --

8 A. No, I'm good. I'm good.

9 Q. All right. Let me know.

10 Okay. So -- right.

11 So did you also -- like, did you process the
12 garage floor with the luminol, or was it just Forensic
13 Specialist King?

14 A. Just Forensic Specialist King.

15 Q. Okay. Did you perform a positive quality
16 control test for the luminol?

17 A. I don't believe I did.

18 Q. Okay.

19 A. No, I didn't have anything to do with mixing or
20 testing with the luminol. All I did was take
21 photographs.

22 Q. Okay. So you, essentially, just witnessed it,
23 like, happening and then documented it with photographs
24 what the results were?

25 A. Yeah. I mean, I saw them spray, and then, I

1 mean -- well, I mean, I didn't actually see her because
2 the lights were out, but I was -- as she was spraying,
3 as soon as we saw anything, I took a photograph of it.
4 So I was involved in the actual -- while she was
5 processing, I was waiting for photo -- you know, any
6 results to photograph, because it doesn't stay bright
7 for very long, so you have to --

8 Q. You have to document it rather quickly?

9 A. Yes.

10 Q. Okay.

11 A. So I was focused on doing what I needed to do
12 with the camera.

13 Q. Right.

14 So, in your experience, have you handled
15 luminol or sprayed luminol and done an analysis, you
16 know, using luminol in your experience -- in your
17 20-year experience?

18 A. I have been -- I've been involved, yes, when
19 we've applied luminol.

20 Q. Okay. Is there a negative quality control test
21 for luminol?

22 A. We used -- we just do it for a positive. We
23 look to see if it's working by using, like, usually a
24 penny or something, or a bloodstain. A known
25 bloodstain, we do it --

1 Q. Okay.

2 A. -- because luminol is known to react with a lot
3 more than just blood. So we use a -- we have -- in our
4 kit, we have pennies, because it will react with that,
5 too. So we'll spray it on that to see if it works, and
6 if it gives a positive result we know the chemicals are
7 working.

8 Q. Okay.

9 A. But there isn't a negative quality control
10 test.

11 Q. Okay. Thank you.

12 And so, what were the results of, you know, the
13 luminol analysis on the garage floor?

14 A. There were areas of luminescence that I
15 photographed, but I can't tell you anything beyond that.
16 I just photographed the areas of luminescence.

17 Q. Okay. To your knowledge, you know, being
18 involved at least in documenting the results, were the
19 areas of luminol kind of luminescent analyzed with
20 phenolphthalein?

21 A. Yeah. I know that somebody took swabs while we
22 were there, but I honestly, to be honest with you,
23 wasn't paying attention to that. I was focusing on the
24 camera. We had somebody else that was taking care of
25 the swabs, so I don't know the exact results of those.

1 Q. Okay. To your knowledge, do you know if any
2 further testing, like a confirmatory test, was done for
3 the samples that were collected from the garage floor
4 area that was sprayed with luminol?

5 A. No, you'd have to talk to the case agent. They
6 have to make the decision if it's even sent to the lab.
7 We're not -- we just submit those -- what we collect to
8 property, and then the case agent has to get with --
9 they have to make the -- they have to get with the lab
10 and with -- we do have one person in our office who
11 takes those samples to the lab when requested --

12 Q. Excuse me.

13 A. -- so...

14 Q. So in your experience as a forensic specialist,
15 what would be the significance of a positive luminol
16 test at the scene, followed by a positive
17 phenolphthalein test at the scene, which is then
18 followed by a negative confirmatory test for blood in a
19 laboratory?

20 A. I can't answer anything about a confirmatory
21 test. We have nothing to do with that. I'm not a
22 chemist. I don't even -- most of the time I don't even
23 know what the final results are from a lab, because
24 we'll often process and swab so many areas and they only
25 send what they can. You know, they have to -- they have

1 a procedure of how many they can take at a time to the
2 lab, so I don't even often get those results, so I
3 couldn't be sure.

4 Q. Okay. Going back to when you initially
5 responded to 511 Seaview as the search warrant was being
6 executed --

7 A. Yes.

8 Q. -- were you briefed by Largo PD or Tarpon
9 Springs PD about what was going on?

10 A. I don't recall which detectives. We were
11 working with detectives from both agencies, so I'm not
12 exactly sure.

13 Q. Okay. At any point during your time at
14 511 Seaview, did you discuss when the suspect acquired
15 the Toyota Tundra with Largo PD or Tarpon Springs PD?

16 A. I'm sorry. When they acquired it?

17 Q. Yeah. When the suspect acquired the vehicle.

18 A. No, I have no knowledge of that.

19 Q. Okay. And so, you wouldn't know anything about
20 when the suspect acquired or purchased the truck?

21 A. I don't. Not to my knowledge, no. I don't
22 know anything about it.

23 Q. Okay. Did -- during your time at 511 Seaview,
24 did you witness either Largo PD detectives or Tarpon
25 Springs PD detectives search, you know, within the

1 residence or around the residence?

2 A. We were all working together. There were a lot
3 of people there. I don't know who specifically looked
4 in what areas.

5 Q. Okay. During your time at 511 Seaview, did you
6 know anyone that seemed out of place or perhaps
7 shouldn't have been there?

8 A. Not to my knowledge, no.

9 Q. Okay. And, you know, in your experience, were
10 you able to discern who was a Largo PD detective and who
11 was a Tarpon Springs PD detective?

12 A. I don't recall. I mean, like, other than some
13 of their names and faces, I don't know. It's a large
14 residence. We were never all at the same place at the
15 same time. So honestly, you know, I'm good with faces.
16 Names, hmm. So I'd have to, like, sit there and look at
17 their thing. I mean, at the time, I did, but right now
18 I can't remember.

19 Q. Understood.

20 To your knowledge, how was the search
21 organized? You know, for example, were there teams set
22 up to search certain areas? Do you know?

23 A. I was just directed -- you know, my supervisor
24 directed me where to go, what areas to go to, and that's
25 basically what I did. I don't know if they had a game

1 plan.

2 Q. Okay. How long did the execution of the search
3 warrant take?

4 A. I don't know. I mean, I was on scene. I can
5 tell you how long I was on scene. I can't tell you the
6 exact time.

7 Q. That's fine. Thank you.

8 A. I know I got there at -- I got there at just
9 before 11:00 p.m., and I was -- I mean, I still -- I
10 don't know what time exactly. I'd need to look at the
11 CAD results to tell you exactly what time I left there,
12 though.

13 Q. Okay.

14 A. Yeah. I don't know what time it was. It might
15 have been, like, 6:00 a.m. that we left, but I don't
16 know if anyone else was still there.

17 Q. Okay. You had mentioned just a moment ago
18 that, you know, you don't recall, like, who specifically
19 searched what, like as far as, you know, Largo PD or
20 Tarpon Springs PD personnel is concerned.

21 So is it fair to say that you don't recall
22 specifically who might have gone through, like, the
23 closets or the drawers or the suitcases, or who was
24 handling guns or guitars at the property?

25 A. I was made aware from the beginning that Tarpon

1 Springs and a Largo detective -- I would have -- there
2 would be somebody -- they were working together. So
3 there was always -- in each of the areas, there was
4 going to be a Largo and a Tarpon Springs, but, like I
5 said, it's a large residence and I don't -- I wasn't
6 watching them all the time.

7 Q. Right.

8 So you can't name, like, any specific
9 individuals who did any specific things as far as
10 searching the property is concerned?

11 A. No.

12 Q. Okay. And one more question.

13 During your time at 511 Seaview, did you
14 witness any Largo PD personnel, specifically either
15 Detective Borne or Detective Hunt, wear shoe covers when
16 walking through the garage?

17 A. I don't recall.

18 Q. Okay. All right. So you have a list of items
19 in your -- items. Areas. Sorry. Areas of the
20 residence that you photographed.

21 And so, these -- is there anything that is not
22 on this list that you photographed?

23 A. Not to my knowledge. I mean, there -- it was a
24 large residence. There were a lot of items. These were
25 the primary items of interest that I documented, but in

1 the -- as far as the 360, it's just overall. I'd have
2 to look at the exact. I believe we did the entire
3 interior residence. I can't say that I captured every
4 closet or anything like that, but -- and those are just
5 general. Like I said, it's like a fisheye 360
6 photograph. Nothing is zoomed in on or anything like
7 that. And then the other -- these are more of the items
8 on the listing that I have of where I did in the garage
9 when I had my regular digital camera.

10 Q. Okay. Right.

11 And that's very helpful, because you do also
12 have a list of, you know, what you tested with
13 phenolphthalein, and a list of where the positive
14 results were and where the negative results were, and
15 that's very helpful for me. And so I also see the items
16 that you collected.

17 So once you were, you know, finished with your
18 involvement as far as, like, collecting or documenting
19 or testing, did you depart the residence at 511 Seaview
20 Drive?

21 A. Yeah. After I finished collecting all the
22 evidence, I would -- I would respond back to our
23 forensic sciences division where I package the items and
24 submit my photo disks as well as submit the items for
25 property.

1 Q. Okay. And so did you have any further
2 involvement in the execution of the search warrant once
3 you left the scene?

4 A. No, I did not.

5 Q. Okay. What about the processing of the Tundra
6 at the garage? Any involvement there?

7 A. No. I had no further involvement in the case
8 at all.

9 Q. All right.

10 A. That's the extent of it.

11 MR. RAMOS WICKS: Thank you. I appreciate it.
12 I don't have any further questions. I'm going to
13 check in with Mr. Vonderheide and see if he has any.

14 A. Okay.

15 MR. VONDERHEIDE: No questions.

16 MR. RAMOS WICKS: All right. Would you like to
17 read or waive, Ms. Zuchetto?

18 THE WITNESS: Read, please.

19 MR. RAMOS WICKS: Okay. I'm going to stop
20 recording, and then you can provide your
21 information; okay?

22 THE WITNESS: Sure.

23 (At 4:24 p.m., no further questions were
24 propounded to this witness.)

25

CERTIFICATE OF OATH

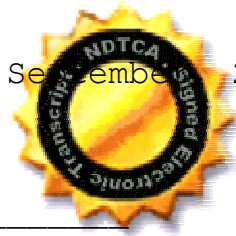
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STATE OF FLORIDA
COUNTY OF PINELLAS

I, Lori A. Seiden, RPR, FPR-C, Notary Public,
State of Florida, certify that DANA ZUCHETTO virtually
appeared before me on the 15th day of April, 2024, and
was duly sworn.

WITNESS my hand this 19th day of September 2024.

Lori A. Seiden



Lori A. Seiden, RPR, FPR-C
Notary Public - State of Florida
My Commission No.: HH 226917
My Commission Expires: June 6, 2026

1 CERTIFICATE OF REPORTER

2

3 STATE OF FLORIDA

4 COUNTY OF PINELLAS

5

6 I, Lori A. Seiden, RPR, FPR-C, do hereby certify
7 that I was authorized to and did stenographically
8 report the foregoing deposition of DANA ZUCHETTO; that
9 a review of the transcript was requested; and that the
10 foregoing transcript is a true and complete record of
11 my stenographic notes.

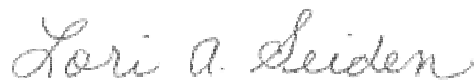
12 I further certify that I am not a relative,
13 employee, attorney or counsel of any of the parties,
14 nor am I a relative or employee of any of the parties'
15 attorneys or counsel connected with the action, nor am
16 I financially interested in the action.

17

18 Dated this 19th day of September, 2024.

19

20



21

Lori A. Seiden, RPR, FPR-C

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25

1 September 23, 2024

2

3 DANA ZUCHETTO
dzuchetto@psco.net.com

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5

6 Dear Ms. Zuchetto:

7 Your deposition taken in the case of State of
8 Florida vs. Tomasz Kosowski on April 15, 2024, has been
9 transcribed. Per your request to review the
10 transcript, it is being held at our office at 728 South
11 New York Avenue, Lakeland, Florida, until October 23,
12 2024.

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

16 Thank you for your prompt attention to this matter.

17

18 Sincerely,

19

20

Lori A. Seiden

21

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Lori A. Seiden, RPR, FPR-C

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