

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: DETECTIVE JERRY HUNT

DATE TAKEN: September 11, 2024

TIME: 1:05 p.m. to 3:59 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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TESTIMONY OF DETECTIVE JERRY HUNT	PAGE
DIRECT EXAMINATION BY MS. POWERS SELLERS	4
CERTIFICATE OF OATH	115
CERTIFICATE OF REPORTER	116
EXHIBITS	NONE

1 The deposition of DETECTIVE JERRY HUNT was taken
2 pursuant to notice by counsel for the Defendant on the
3 11th day of September, 2024, commencing at 1:05 p.m.,
4 via Zoom videoconference. Said deposition was
5 stenographically reported by Lori A. Seiden, RPR,
6 FPR-C, Notary Public, State of Florida at Large.

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8 DETECTIVE JERRY HUNT,
9 a witness, having been duly sworn to tell the truth,
10 was examined and testified upon his oath as follows:

11 THE WITNESS: I do.

12 DIRECT EXAMINATION

13 BY MS. POWERS SELLERS:

14 Q. Good afternoon. My name is Amanda Sellers and
15 I represent Tomasz Kosowski. And, let's see, it's
16 September 11th. We're here with Detective Hunt and
17 Nathan Vonderheide for the state.

18 All right. On the -- first of all, have you --
19 I'm assuming you've given a deposition before?

20 A. I have.

21 Q. Okay. Can you state your full name?

22 A. My name is Jerry Hunt; that's J-e-r-r-y
23 H-u-n-t.

24 Q. And how are you employed?

25 A. I am currently employed as a detective with the

1 City of Largo Police Department.

2 Q. How long have you been a detective with Largo?

3 A. I transferred to the investigative services
4 division in December of 2020.

5 Q. And before that?

6 A. Prior to being a detective, I served with the
7 traffic safety unit as one of the traffic homicide
8 investigators. I did that for about four and a half
9 years. And before that, I worked patrol. I was a field
10 training officer and patrol officer.

11 Q. Okay. Do you have your reports in front of
12 you? We might not get to them, but it's possible. Do
13 you have them with you?

14 A. Yes, I have. I am prepared for the deposition.

15 Q. Okay. And you reviewed everything. Do you
16 want to -- I guess, first, we could go through a list of
17 your supplements. I'll tell you what. Let's just do it
18 this way. I'm just going to go through these questions
19 first.

20 A. Okie-doke.

21 Q. Drawing your attention to March 21, 2023, on a
22 late morning or early afternoon of March 21st, did you
23 enter and examine the men's bathroom at 1501 Belcher?

24 A. I did.

25 Q. And how many times did you enter that bathroom?

1 A. Maybe twice. I'm just speculating. I did go
2 in probably twice.

3 Q. Was that before --

4 A. No, I went in twice prior to crime scene being
5 called. After the crime scene had been processed, I
6 also did a walk-through of the entire scene once PCSO
7 forensics had finished, so maybe three times total.

8 Q. Okay. Did you examine the bathroom with
9 Officer Jennifer, is it Bure?

10 A. It's Bure, yes. We entered the bathroom with
11 her, and I also entered the bathroom with Detective
12 Bolton.

13 Q. Were you wearing shoe covers when you entered
14 the bathroom?

15 A. No. When we first arrived on scene, we weren't
16 sure what we were working. It came in as a missing
17 person. I do recall the shoes that I was wearing. It
18 was a pair of ostrich leather boots with flat soles, and
19 my footwear was photographed by forensics when they
20 arrived later. In that way, I believe they photographed
21 them.

22 Q. Were you wearing gloves when you opened the
23 outside door of the men's bathroom?

24 A. No. I believe I pushed it open with my shoe.
25 When I exited the door, it shut behind me. I took a

1 clean paper towel, used that to open the door, and then
2 I provided that paper towel to forensics.

3 Q. Do you recall putting on gloves prior to
4 entering the men's bathroom?

5 A. No, I don't believe that I wore gloves. Again,
6 when we initially responded, we weren't really sure what
7 we were working. We just thought we had a missing
8 person.

9 Q. Do you recall if Officer Bure was wearing
10 gloves or shoe covers?

11 A. You would need to talk to Officer Bure about
12 that.

13 Q. After examining the 1501 Belcher bathroom, you
14 went with Officer Bure to the Tampa Bay Veterinary
15 Specialists office; correct?

16 A. Yeah. That area is an office complex, and
17 there's three businesses that are located there.

18 Q. And that particular office is located in the
19 south side of Building B?

20 A. Yeah. I believe specifically it would be the
21 southwest corner of Building B.

22 Q. And you went there to view surveillance video?

23 A. Correct.

24 Q. Did you discuss with Officer Bure the amount of
25 blood in the bathroom at any given time? Sorry. I'm

1 kind of jumping around.

2 A. No, you're fine.

3 Q. Did you --

4 A. I don't recall the exact conversation that I
5 had with her. I know that I had viewed some drops of
6 blood on the side of the partition between the urinal
7 and the single toilet. There was some blood smear,
8 looked like, on the underside of the toilet in that
9 bathroom. And then it looked like there was blood on
10 the outside of the door, but I don't recall having a
11 specific conversation with Officer Bure about the
12 quantity of blood and things like that.

13 Q. Did you notice it to be a lot of blood, a
14 little blood? What was your initial thought?

15 A. So the areas that I observed that had liquid
16 that I would readily identifiable -- be readily
17 identifiable as blood, again, it was some drops on the
18 side of the partition. There was some smearing under
19 the toilet. There looked to be some smear on the
20 exterior of the door of the bathroom. There was also,
21 like, a dark substance on the floor. It was pretty
22 large and it looked like it had kind of been cleaned up.
23 I don't know exactly what that was.

24 Obviously, forensics came and processed and
25 took different samples and things like that. They would

1 be better suited to identify those liquids and what
2 their findings were.

3 Q. So regarding the droplets of blood and the
4 stuff that you can say, yeah, that's probably blood, can
5 you give an estimate on how much it was? Are you able
6 to quantify that? Like maybe a few droplets or a
7 bucketful? I mean --

8 A. Yeah. Like I said, I don't know. You'd want
9 to talk to forensics about, you know, what was on the
10 floor. It looked like a liquid substance had kind of
11 been cleaned up. It kind of went towards the drain. I
12 don't know how much would have been there.

13 Again, I am aware that they did some
14 presumptive testing that tested positive for blood.
15 They would be better suited to tell you exactly where
16 they tested and what exact areas were what.

17 Q. What color shirt was Mr. Cozzi wearing
18 underneath his red sweater on March 21st, if you know?

19 A. I don't know. I would refer back to the scene
20 for that.

21 Q. Did any surveillance video that you viewed on
22 the 21st of March 2023 at the veterinarian's office or
23 in any subsequent days of your investigation positively
24 identify Kosowski as being at the 1501 Belcher location
25 on March 21st?

1 A. The male that exited with the cart and the
2 contents there in the cart that were covered by the
3 reddish-orange blanket, he was wearing a facial covering
4 at the time that he exited. If my memory serves me
5 correctly, when he entered the building there was a box
6 over his left shoulder that obstructed the view of his
7 face.

8 Q. What kind of covering did he have on his face?

9 A. I believe he had, like, a COVID-style surgical
10 mask.

11 Q. So you saw a male. Were you able to tell his
12 race in that video?

13 A. I'd want to go back and refer to it. I mean,
14 the video is going to be the best depiction of what is
15 there.

16 Q. Sure.

17 Were you able to positively identify the
18 driver, or were you able to positively identify Kosowski
19 driving a truck on any surveillance video?

20 A. Me personally, no.

21 Q. Are you aware of whether or not anyone was able
22 to identify Dr. Kosowski as the driver? In other words,
23 could you see a face in the video?

24 A. I don't know the answer to that.

25 Q. On March 21, 2023, the surveillance footage at

1 the vet's office, the 10:22 a.m. timestamp, you wrote in
2 your police report that you saw an individual pulling a
3 wagon.

4 What do you recall about the individual or the
5 wagon that that person is pulling?

6 A. Well, the wagon -- give me one second. You're
7 talking about the surveillance video at 10:22 when he
8 exits?

9 Q. Yes, or when an individual exits.

10 Do you recall what kind of wagon it was?

11 A. I believe it was a black wagon. It's similar
12 to the wagon that we located in Mr. Kosowski's garage.
13 He had the surgical mask. He had a hat. He had a
14 backpack, wearing blue short-sleeve shirt and a pair of
15 jeans.

16 Q. And going back to the actual footage, did this
17 individual appear as though he might be homeless?

18 A. I don't know.

19 Q. How did Dr. Kosowski become a suspect in this
20 case?

21 A. We identified a Toyota Tundra that was -- had
22 exited the -- had entered the business, subsequently
23 exited the business later on with the -- in surveillance
24 video from the Circle K that's located at 142nd and
25 Belcher, you can see the red portion of what was in the

1 cart out back. We ended up following that vehicle north
2 on Belcher Road through surveillance. Detective Gay
3 ended up identifying that vehicle on a Flock camera hit
4 on Klosterman Road, and we continued basically those
5 breadcrumbs of that truck, which that drove to
6 Dr. Kosowski's house.

7 Dr. Kosowski was also listed when we were
8 looking at the victim. The victimology was the only
9 person that was listed as having a run-in with
10 Mr. Cozzi. So we didn't jump to any conclusions. We
11 didn't have much when we were at the scene except for
12 the pickup truck, and we took our time and diligently
13 investigated that lead and followed the truck on
14 surveillance from Largo up to Tarpon Springs and to
15 Dr. Kosowski's residence.

16 Q. So you identified the truck and the owner of
17 the truck?

18 A. No, we followed the truck. The vehicle had a
19 New Jersey tag on it that wasn't currently registered to
20 a vehicle at the time. Once we served the search
21 warrant on Dr. Kosowski's residence and we located the
22 truck inside, the VIN was run for the vehicle.
23 Detective Sinni, to my understanding, was able to locate
24 the previous seller who had sold the truck to
25 Dr. Kosowski, had registered that sale with the DMV, and

1 Dr. Kosowski had never registered that vehicle.

2 Q. So is that how his name first came up?

3 A. No. His name had come up because Mr. Cozzi had
4 missed a court case that he had, which was outside of
5 his normal. That wasn't normal for him. He was being
6 described as being a punctual person, and missing a
7 hearing wasn't like him. So he ended up missing a
8 hearing that was with Dr. Kosowski in reference to some
9 case that Dr. Kosowski was representing himself with.

10 Q. And when you say you followed the truck, how
11 did you follow the truck?

12 A. Well, luckily, the cart with the contents in
13 the truck that we located in Dr. Kosowski's residence
14 had, like, a cover on the truck that could be -- you
15 know, conceal whatever is in it. So the red portion of
16 that cart was over the top of the truck bed and so it
17 couldn't be closed.

18 And so we ended up going through a neighborhood
19 canvass for surveillance videos that captured Belcher
20 Road, and we followed the truck on that surveillance.
21 And it was kind of easy to pick out because of the
22 distinguishability of the Tundra with that item in the
23 back of the truck.

24 And, again, we had a team of detectives, so we
25 just kind of leapfrogged down Belcher Road following the

1 truck. You know, here's the truck at this timestamp.
2 Go a little bit down the road, okay, the truck is still
3 on this road. Go down the way, and we ended up
4 getting -- taking Belcher all the way to Klosterman.
5 And then Detective Gay ended up finding the truck on a
6 Flock camera westbound on Klosterman.

7 Q. Do you remember who the first person was that
8 mentioned Dr. Kosowski's name to you?

9 A. I think it probably would have been
10 Mr. Blanchard, because he had given us the information
11 about Steven missing the hearing and who it was with.

12 Q. So you interviewed Celeste, I think it's Bacher
13 or Bach --

14 A. I don't remember how she pronounces it. Yes,
15 I've been referring to her as Ms. Bacher.

16 Q. Bacher. Okay.

17 She's an administrative assistant with Ronati,
18 on March 21st, 2023; correct?

19 A. Yes, ma'am.

20 Q. And do you recall what time that interview took
21 place, or do you have that documented somewhere?

22 A. I don't. I was in the -- in the office complex
23 and she kind of came up to me and said, "Hey, can I talk
24 to you for a second?" And then she disclosed the
25 information that I documented in the report.

1 Q. Were you inside or outside?

2 A. We were inside.

3 Q. Like in a community area or an office?

4 A. I believe she approached me kind of in that
5 lobby area, and we stepped into the office area of
6 Ronati Tech.

7 Q. And Ms. Bacher reported to you just a few hours
8 prior to your interview, she described seeing an unknown
9 white male in his thirties with brown hair, medium
10 build, and a short goatee?

11 A. Correct.

12 Q. And that was in Building B; correct?

13 A. Yes.

14 Q. And the unknown male was seen at the
15 1501 Belcher B Building around the time of Mr. Cozzi's
16 disappearance; correct?

17 A. Correct.

18 Q. Do you know who the unknown male was that
19 Ms. Bacher saw around the time of Mr. Cozzi's
20 disappearance?

21 A. The description that she gave with the Jack
22 Hanna safari-style shirt matches the description of the
23 male who had entered prior to Mr. Cozzi's disappearance.
24 I would presume that that person that she saw would be
25 that individual that entered on surveillance.

1 Q. Is that what you assumed at the time?

2 A. Yes.

3 Q. Did you -- are you aware of whether anyone dug
4 deeper into that?

5 A. So I know that I spoke with a couple members of
6 the veterinary office. Ms. Bacher had kind of thought
7 that the person worked for the veterinary office because
8 of the clothing they had worn. I did end up speaking
9 to, I believe it was Ms. Stecher, who is the regional
10 manager for the veterinary office, who had described the
11 uniforms for the staff of the veterinary office, that
12 they wear scrubs and the males typically wear gray
13 scrubs and that there are no males that are -- that work
14 permanently out of that Building B, but obviously there
15 are members of staff at the veterinary office that are
16 male and that they do come in the Building B from time
17 to time.

18 Q. And she said that that individual had a short
19 goatee; right?

20 A. That was the description that she gave,
21 correct.

22 Q. Did -- was she ever given the opportunity to
23 look at the surveillance video to see if it was the same
24 person?

25 A. I did not do that. I do not know if another

1 detective did.

2 Q. And assuming that was done, whoever did it
3 would have noted that in their report somewhere?

4 A. I would hope that that would have been
5 documented.

6 Q. And if that person had not been identified as
7 Dr. Kosowski or anyone else, it just remains
8 open; correct? Like, there's no -- would there be any
9 effort to find that person that she says that she saw?

10 A. Like, from at this moment?

11 Q. Yeah. Is there any ongoing effort or is that
12 closed?

13 A. I'm not aware of that, but that's something I
14 can bring up to Detective Bolton.

15 Q. Did anyone look on any of the other
16 surveillance videos to see if there was an individual
17 who matched the description of the individual that
18 Ms. Bacher said she saw?

19 A. I did not watch the entirety of the
20 surveillance video. If my recollection serves me
21 correct, I know that Detective Moore had viewed much of
22 the surveillance video, if not all of it. So I would
23 say following up with him would be the person that you
24 would want to speak to.

25 Q. Was that individual -- and, you know, assuming

1 they're two different individuals because one has a
2 goatee, Dr. Kosowski doesn't, assuming for a second that
3 they're two different people, did anyone consider that
4 this person be identified a possible suspect?

5 A. So, obviously, in looking at the surveillance
6 video, we were operating under the premise that the
7 gentleman that entered with the white shirt and the
8 gentleman that entered with the blue shirt was the same
9 gentleman and had changed clothing. Because from my
10 knowledge, the guy with the blue shirt was never seen
11 entering; the guy when the white shirt was never seen
12 exiting. So from my knowledge, we believe that they
13 were the same person.

14 In reference to goatees and things like that,
15 obviously people can grow goatees or shave them or put
16 fake hair on their face and things like that. I mean,
17 we can speculate all day about what could and could not
18 happen.

19 Q. Yeah, we don't want to do that.

20 A. No, we don't.

21 But we followed the leads that we had, and the
22 only lead that we had was that pickup truck with the
23 wagon that had been removed from the property. And we
24 followed that pickup truck with the wagon on
25 surveillance, which leads directly to Dr. Kosowski's

1 residence.

2 Q. Okay.

3 Did Ms. Bacher's physical description of the
4 unknown male with the goatee she saw on the 21st match
5 the physical description Ms. Henrichs gave of the
6 unknown male she saw on the 14th in the utility closet?

7 A. I'll have to review her exact physical
8 description. Detective Compton is the person that
9 interviewed her, Ms. Henrichs, and he did provide some
10 information to me in reference to a search warrant I had
11 written. So if you give me one quick second.

12 Q. Okay.

13 MR. VONDERHEIDE: Amanda, can you let Spadaro
14 in? I think she's in the waiting room.

15 MS. POWERS SELLERS: Yes, she is. I see her.

16 MR. VONDERHEIDE: Thank you.

17 (Ms. Spadaro entered the Zoom videoconference.)

18 THE WITNESS: I didn't document the exact
19 description that Ms. Henrichs had given. Again, I
20 would refer to Detective Compton for that question.

21 BY MS. POWERS SELLERS:

22 Q. Okay. After Mrs. Bacher failed to identify
23 Dr. Kosowski as the unknown man she saw the morning of
24 March 21st from the photo lineup --

25 A. Oh, did she do a photo lineup?

1 Q. I believe so. And if you're not aware of that,
2 you probably can't answer this question.

3 A. Yeah, I didn't do a photo lineup with her, so
4 probably. I mean, you're welcome to ask it. If I have
5 any independent recollection of it, I'm happy to share.

6 Q. Do you -- did any follow-up interviews with
7 Mrs. Bacher after a lineup?

8 A. I did not, no.

9 Q. And why not?

10 A. I don't recall there being a lineup, so --

11 Q. Okay.

12 A. -- I would imagine that the detective that
13 conducted the lineup would have done a follow-up
14 interview.

15 Q. Did any other Largo Police Department agent
16 interview Ms. Bacher after her photo lineup?

17 Again, that's another question regarding the
18 lineup that you're not aware of, so we can skip that
19 one.

20 A. Okay.

21 Q. Well, that's my answer. I wasn't aware of a
22 photo lineup either. I'm sorry. The final question is
23 a little bit out of order.

24 It says why was -- oh, no. Maybe Mrs. Bacher
25 was but Mrs. Henrichs wasn't.

1 Why was Mrs. Henrichs never shown a photo
2 lineup, is this the question?

3 A. I don't know.

4 Q. How did Ms. Henrichs come to identify
5 Dr. Kosowski as the man she saw on 3/14?

6 A. I don't know. I didn't interview her.

7 Q. Do you recall what day she came forward and
8 made a positive ID?

9 A. No, ma'am.

10 Q. Do you recall, were you made aware of her
11 calling at all when she thought she recognized an
12 unknown male on March 14th?

13 A. I don't have any independent recollection of
14 any of that. I wasn't the detective that spoke with her
15 in person. No, ma'am, I do not.

16 Q. Okay. I'm just reading through the next few
17 questions that are related to Ms. Henrichs.

18 A. Okay.

19 Q. How many gray Toyota trucks were in the parking
20 lot on March 21st in the morning or afternoon, if you
21 know, at the 1501 Belcher?

22 A. I do not know.

23 Q. Is it possible there could have been other gray
24 trucks parked there, morning or afternoon?

25 A. There are many gray trucks throughout Pinellas

1 County. I didn't -- I didn't go through the parking lot
2 and count them, specific types of vehicles and things
3 like that. So is it possible? I guess so, but I
4 don't -- I don't have any knowledge of that.

5 Q. Did you note the gray Toyota truck parked in
6 the south parking lot of 1501 Belcher, Building B, on
7 Officer Bure's body camera?

8 A. I did not. She didn't show me the body camera
9 or anything like that.

10 Q. Was Mr. Blanchard concerned for Mr. Cozzi's
11 welfare when you interviewed him on the 21st?

12 A. He was. He was actually pretty shook up.

13 Q. Did he suspect foul play?

14 A. He had mentioned that he found blood in the
15 bathroom and had no idea what happened to him and that
16 he had disappeared. Mr. Cozzi had left behind many of
17 his personal effects to include his wallet and cell
18 phone, and he was concerned for his safety and didn't
19 know what was going on.

20 As far as suspecting foul play, I would think
21 Mr. Blanchard would be the best person to ask what he
22 suspected at the time.

23 Q. There's a roof access hatch in the electrical
24 closet?

25 A. Yes.

1 Q. Could someone exit that hatch in Building B
2 without being detected?

3 A. So Detective Bolton and I conducted a canvass
4 of the office. We did climb up on the roof. There was
5 no way to get down from the roof if you were on there,
6 other than jumping. It's pretty high, so I would say
7 not.

8 Q. How high is it, approximately?

9 A. We could take a measurement. I don't want to
10 speculate. It's a one-story building but it's got --
11 the roof -- when you're on the roof, it's -- it's
12 larger, so I don't know.

13 Q. Is it the air ducts and -- it's kind of a
14 flatter roof, isn't it?

15 A. Yeah. Yeah. You've got tall ceilings in the
16 office complex and, obviously, there's the air ducts and
17 everything above that. Then you have the actual roof
18 outside. And then when you kind of look at the office
19 complex, it kind of looks like -- like a pitched roof,
20 but then it's like -- like a half wall that then goes
21 back down. So you'd have to climb up on that half wall
22 and then jump off the roof.

23 Q. Okay. There are doors and exits on the south
24 side of Building B.

25 Could someone walk out of any of those doors or

1 exits without being detected?

2 A. They could. I actually walked the perimeter of
3 the office building and I noted that all the doors were
4 locked and that there was no signs of forced entry or
5 anything in the office complex.

6 Q. It was reported that keys to the outside doors
7 of the vacant units for Building B were left out in the
8 open on top of furniture and cabinets.

9 Did you note that as well, or did you care
10 about --

11 A. Yeah, Detective Bolton and I ended up locating
12 that at some point when we were on scene. There was a
13 key. I think it was on a desk or a conference table or
14 something. And we -- we checked it and it did work for
15 one of the units. It was the unit that was located on
16 the southeast corner of the office complex.

17 Q. How many unknown males did you see enter
18 1501 Belcher, Building B, between 8:30 a.m. and noon on
19 surveillance video?

20 A. I didn't watch that surveillance in its
21 entirety. I did watch the portions for the white
22 male -- for the male in the white shirt and the male in
23 the blue shirt. So I can't give you an answer to that.

24 Q. Did you notice if that individual had a goatee?

25 A. So the individuals -- or the individual, the

1 one with the white and blue shirt, again, blue-shirt
2 individual had the surgical-style mask on, so that was
3 obstructed. And then to my recollection, the other male
4 had the box on his left shoulder which obstructed his
5 face, so I couldn't see the area where a goatee would be
6 located.

7 Q. Did you note any other individuals carrying
8 crates or wagons in or out of the building on
9 surveillance?

10 A. Again, I did not watch the entirety of that
11 surveillance video; another detective did, so I don't
12 have the answer to that.

13 Q. Did you -- in the portions that you did see,
14 did you see a UPS driver that arrived around 9:49 a.m.?

15 A. I don't have a recollection of that. Again,
16 happy to view the video. That's the most accurate
17 representation of what we have.

18 Q. Do you know how long Mr. Cozzi lives -- how
19 long it takes for Mr. Cozzi to get from his house to
20 work, approximately?

21 A. I don't have that information. I know where --
22 I know where he lives. I know where his office is, but
23 all that would be dependent on traffic. We did get a
24 video of Mr. Cozzi exiting his residence from his Ring
25 doorbell camera that morning of the 21st, and then

1 Mr. Cozzi is identified as entering the building. So we
2 could -- you could cross-reference those times. I can
3 look to see if I have that in my report.

4 Q. It looks like he left his home around 8:09 and
5 he arrived at the building at 8:37. So according to
6 that, about 18 minutes.

7 Did you go back and trace his potential path to
8 work that morning?

9 A. I did not, no, ma'am.

10 Q. Are you aware if anyone did?

11 A. I don't know. I apologize.

12 Q. Did Michael Montgomery report to you that when
13 he first arrived at 1501 Belcher, he and Jake Blanchard
14 discussed Dr. Kosowski but that Mr. Blanchard was not
15 concerned or otherwise suspicious of Dr. Kosowski having
16 harmed Mr. Cozzi?

17 A. I recall speaking with Mr. Montgomery. I do
18 know Mr. Montgomery had indicated that Mr. Kosowski had
19 been confronted -- actually, that Mr. Cozzi had been
20 confronted by Mr. Kosowski in the law office of the
21 bathroom after a contentious deposition. I don't recall
22 what -- if Mr. Blanchard made any comments in reference
23 to that. I believe Detective Bolton probably recorded
24 that interview. I would refer to the report of
25 Detective Bolton for that to be sure.

1 Q. After speaking -- did you speak to Mr. Cozzi's
2 family?

3 A. I think I spoke to his father briefly when he
4 had showed up later.

5 Q. Were you made aware of any issues, such as
6 alcoholism?

7 A. My understanding is that Mr. Cozzi was a
8 recovered alcoholic.

9 Q. Were there -- was there a discussion about
10 Mr. Cozzi's anxiety?

11 A. I am aware that he was diagnosed with anxiety.

12 Q. Was that -- did that information come from his
13 family?

14 A. I believe that information came from
15 Mr. Montgomery, if my memory serves me correctly.

16 Q. Do you -- or have you become aware of any
17 history about interactions with previous roommates or
18 boyfriends as it pertains to Mr. Cozzi?

19 A. I'm not aware of any of that, no, ma'am.

20 Q. Do you know about Mr. Cozzi moving away from
21 New York City to live with his parents due to an
22 incident in New York?

23 A. I'm not aware of any of that, no.

24 Q. Were you -- are you aware of any arrest
25 history?

1 A. For Mr. Cozzi?

2 Q. For Mr. Cozzi.

3 A. I'm not aware of that. I didn't run his
4 criminal history. I imagine Detective Bolton did.

5 Q. Are you aware of any arrest record for
6 Mr. Montgomery?

7 A. No, I'm not aware of any.

8 Q. Where was Jake Pillsbury the morning -- in the
9 morning and early afternoon of March 21, 2023, if you
10 know?

11 A. I have no idea. I believe Detective Gay
12 conducted that interview.

13 Q. Was Mr. Pillsbury ever investigated as a
14 potential suspect?

15 A. Again, we followed the vehicle. So we -- the
16 only concrete evidence -- I don't want to say the only
17 concrete evidence that we had, but the person who left
18 that office complex with the wagon that was full,
19 appeared that the wagon was large enough that a body
20 could fit in it. When we saw the images from the PSTA
21 bus as well as the images from the Flock camera, we
22 believed that the body was in that cart.

23 That's the evidence that we followed in order
24 to develop a suspect. And that Toyota Tundra went to
25 Mr. Cozzi's residence. Mr. Kosowski's residence.

1 Excuse me.

2 Q. Okay. So is it safe to assume that Michael
3 Montgomery and Jake Pillsbury, neither one of them were
4 ever suspects?

5 A. Yeah, we -- the suspect was in the Toyota
6 Tundra. We followed the Toyota Tundra to wherever that
7 led, and that led to Mr. Kosowski's residence.

8 Q. What, in your opinion, happened at 1501 Belcher
9 Road on the morning of March 21st, based on everything
10 that you know?

11 A. Well, there was blood in the bathroom. I think
12 that it would be safe to say that Mr. Cozzi went to work
13 that morning. I know that the blood in the bathroom
14 came back to belonging to him. There was obviously an
15 altercation that had occurred that caused injury.
16 Mr. Cozzi was incapacitated, was removed from the
17 bathroom and building in the cart.

18 It is my understanding that -- well, I was
19 informed by Lieutenant Forcade of Pinellas County
20 Sheriff's Office that Mr. Kosowski's fingerprint came
21 back in the electrical closet at the office complex. It
22 is my understanding that Dr. Kosowski's DNA came back
23 mixed with Mr. Cozzi's blood in the bathroom of the
24 office complex.

25 Mr. Cozzi was removed in the wagon, put in the

1 trunk of the Toyota Tundra. The Toyota Tundra drove
2 northbound on Belcher Road to Klosterman, where it
3 traveled west through Tarpon Springs. I don't have the
4 names of the streets where it went from there, but it is
5 seen on surveillance from the neighbor to the south of
6 Mr. Kosowski's residence and was located in the northern
7 garage bay of Mr. Kosowski's residence.

8 Pursuant to a search warrant of the residence,
9 what was located in the back of the pickup truck, that
10 blood belongs to Mr. Cozzi. Mr. Cozzi was at some point
11 removed from the Tundra and put into Dr. Kosowski's
12 Toyota Corolla. Mr. Cozzi's blood was found in the
13 trunk of the Corolla, and the Corolla went to South
14 Florida.

15 I know that through continued investigations,
16 the -- a dumpster was located in South Florida where
17 cadaver dogs hit on it. Video surveillance of the trash
18 truck shows garbage bags that appear to have a body in
19 it.

20 Q. Let me stop you there.

21 What about that video leads you to believe it
22 had a body in it? Is it the way it was shaped, the way
23 it moved?

24 A. I didn't view the video personally.

25 Q. Okay.

1 A. You asked me what I had --

2 Q. Yes.

3 A. -- so -- and it is my belief that Steven
4 Cozzi's body is located at the landfill in Collier
5 County.

6 Q. Okay. Is it possible that Mr. Cozzi could have
7 walked out of that office out of a different door where
8 there was no surveillance?

9 A. I don't see how, unless he had a key to lock it
10 behind him or anything like that. And then I also don't
11 see how Mr. Cozzi's blood would have gotten into the bed
12 of the Toyota Tundra, the floor of Dr. Kosowski's
13 residence, the trunk of Dr. Kosowski's Corolla.

14 So I would say, no, it would not be possible
15 for him to do that taking into account the totality of
16 all the evidence that was discovered.

17 Q. It's been stated by several different people
18 who work at that office complex that there were homeless
19 people who slept in and around that property.

20 Were you able to find out anything about any of
21 the homeless individuals, that population, that
22 frequented that area?

23 A. I didn't have any conversations with anyone in
24 reference to that. So I didn't follow up with that, no,
25 ma'am.

1 Q. Were you aware of a trespasser on the property
2 or in the parking lot on Sunday, March 19th?

3 A. I'm not. I don't have any -- I mean, I can try
4 to search for it if you want me to.

5 Q. No, you don't have to. I was just -- there was
6 a report at some point. I was just wondering if you
7 were aware of it. I know it was reported by the staff
8 at the vet clinic.

9 A. I'm not aware of that, no, ma'am.

10 Q. There was also another incident where there was
11 a couple with carts or wagons seen loitering around that
12 office building on Monday the 20th.

13 Did you -- did anyone make you aware of that?

14 A. I'm not aware of that, no, ma'am.

15 Q. So the next question: Did you investigate any
16 of the trespassers or homeless people? And I know your
17 answer is no. I need to get clarification. Is that
18 because no one made you aware of those individuals?

19 A. Yeah, I'm not aware of that. So I don't
20 know -- I don't know if other detectives were made of
21 aware of that and if other detectives followed up on
22 that, but I'm not aware of any of that, no, ma'am.

23 Q. Okay. What color shirt was the individual
24 wearing that walked out at 10:22 a.m. on surveillance,
25 out of the lobby doors?

1 A. It was a light blue shirt, short sleeve.

2 Q. And can you say with any degree of certainty
3 who that was?

4 A. Not with the fact that they had a surgical mask
5 on.

6 Q. How many doors are there leading outside in
7 Building B? Do you know?

8 A. No, I don't recall. I know there's the main
9 doors on the north side. I believe there is a side door
10 from the veterinarian offices on the west side, and
11 there are least two doors -- I think there's at least
12 two doors on the south side. But, I mean, we could
13 check forensics' photos. I'm pretty confident they
14 photographed the entire exterior of the building.

15 Q. On the Ironshield Security log of door opening
16 and closing events, Mr. Cozzi's office door, it was
17 9:12 a.m. when Mr. Cozzi exited or entered his office,
18 and then 9:50 when he exited or entered his office. So
19 there's a log of the opening and closing of Mr. Cozzi's
20 office.

21 Do you know which one of the times was actually
22 Mr. Cozzi versus someone else? It looks like there's a
23 9:50 --

24 A. So I was -- when speaking with Mr. Blanchard
25 and the people asking him, Mr. Blanchard and Ms. Watters

1 were working on the case. It's my understanding that
2 the 9:50 would have been the time that he exited his
3 office. That was around -- you know, it was a little
4 before then he had last been seen.

5 And they -- Blanchard went looking for him and
6 couldn't find him, and he called the police. Again, I
7 can check the call log to see what time the call came
8 in, but it's my understanding that the 9:50 log is the
9 time that it's believed that Mr. Cozzi exited his
10 office.

11 Q. And so the 9:12 may have been when he entered?

12 A. I don't know. I know --

13 Q. And then --

14 A. -- there's a surveillance -- kind of like a
15 doorbell camera kind of located out front, but it
16 doesn't record. It only records if you hit the button,
17 and there wasn't any recordings on that. And there's no
18 internal surveillance for the office. So I think
19 Mr. Blanchard would probably be the best person to talk
20 to about exactly when the last time he saw him and that
21 sort of thing.

22 Q. On the morning of March 22nd, you, along with
23 Detective Bolton, interviewed Mr. Montgomery a second
24 time; correct?

25 A. I was present for Detective Bolton's interview,

1 yes.

2 Q. And Detective Bolton wrote in his police report
3 that Mr. Montgomery was not in custody, was free to
4 decline the interview. Is that your understanding?

5 A. I know that Detective Bolton audio recorded the
6 interview, so I would say that that recording is going
7 to be the exact representation of what occurred.

8 Q. Could he have walked away and declined to speak
9 with you at that time?

10 A. No one has to speak to the police, so...

11 Q. Was he read Miranda rights?

12 A. I don't -- I don't recall. Again, it's audio
13 recorded.

14 Q. So at the time, was he being detained?

15 A. No.

16 Q. Did Mr. Montgomery tell you that when he went
17 into the bathroom that he did not notice blood?

18 A. I don't remember. Again, I would refer to the
19 recording.

20 Q. So you don't remember whether or not he told
21 you that when he went into the bathroom he handled or
22 manipulated items within?

23 A. I don't recall, no.

24 Q. Is that something that Detective Bolton would
25 have noted in his report had he mentioned anything like

1 that?

2 A. I can't speak for Detective Bolton. Detective
3 Bolton is a good officer. He's a good detective.
4 Again, we -- when I write my reports, I tend to
5 summarize things. And when I audio record interviews, I
6 summarize it and indicate in the report to please refer
7 to the recording for the totality of the interview,
8 so...

9 Q. Was Mr. Cozzi's Wells Fargo card missing from
10 his wallet?

11 A. Mr. Cozzi had a Wells Fargo card ending in
12 8377; an HSA bank card ending 4729; a TD Bank card
13 ending 9285; a Chase Amazon ending 3248; a Citibank card
14 ending 4948. And I believe the Wells Fargo card was the
15 one that was missing.

16 Q. Are you aware of whether or not that card was
17 found?

18 A. The Wells Fargo card, 8377, was in his wallet,
19 and all of those cards were returned to Mr. Montgomery.

20 Q. Okay. Are you aware --

21 A. I don't know if there's a second Wells Fargo
22 card. I mean, do you have a credit card number for that
23 Wells Fargo card?

24 Q. I don't.

25 Do you recall any cards being missing or there

1 being a discussion about a card being missing?

2 A. I don't recall that.

3 Q. I believe there was one card missing, but I
4 don't know. I can't remember which witness said that.
5 It might have been Mr. Montgomery.

6 A. I apologize. I don't know. Again, those --
7 those cards were returned to Mr. Montgomery. Those are
8 the cards that were in Mr. Cozzi's wallet.

9 Q. Okay. Were you made aware that Mr. Cozzi had a
10 Grindr account?

11 A. I don't know his social media, no, ma'am.

12 Q. Do you know what Grindr is?

13 A. My understanding is it's a dating platform.

14 Q. More of a -- okay.

15 Do you know anything beyond that, that it's a
16 dating platform? Is it for any particular group of
17 individuals?

18 A. I believe it may be for people who are of
19 homosexual orientation.

20 Q. Okay.

21 A. I don't really have any personal knowledge of
22 it, so...

23 Q. Do you -- did anyone run his social media
24 accounts or look into any of that?

25 A. I'm not sure.

1 Q. Who would be in charge of making that call?

2 A. Well, the supervisor on scene was Lieutenant
3 Lomonaco. We do have two detectives that do cyber
4 crimes, Detective Moore and Detective Wedin. So I don't
5 want to make assumptions, but that would be something
6 that would fall in line with something they would do in
7 reference to one of these investigations.

8 Q. Who interviewed Todd Tensley?

9 A. Todd Tensley, I don't know.

10 Q. Do you remember a stripped area of paint in the
11 men's bathroom?

12 A. I do.

13 Q. What do you think happened there?

14 A. Well, with the overwhelming smell of cleaning
15 products, I think that that area was cleaned up after
16 the incident with Mr. Cozzi.

17 Q. Do you know how much Mr. Cozzi weighs?

18 A. Not off the top of my head, no.

19 Q. And in all of the tracking of that truck from
20 the office to the home of Dr. Kosowski, other than
21 seeing the truck and identifying the cover on the back,
22 did anyone see Dr. Kosowski's face in those surveillance
23 videos that you're aware of?

24 A. So the surveillance I found was from the
25 Circle K right there at 142nd and Belcher. From the

1 vantage point of the cameras, the truck is far away.
2 You can make out the truck, you can make out the bag,
3 but you cannot make out any distinguishing features of
4 the driver. I did not review every surveillance that
5 was found by other detectives, so I don't -- I'm unaware
6 of his face being visible on any of those surveillance
7 cameras, and I don't recall anyone sharing that with me.

8 Q. Do you believe there was a significant amount
9 of blood in the bathroom?

10 A. In looking at the floor and the dark areas that
11 were smeared and it going towards the drain. I think
12 that it's possible that there was a significant amount
13 of blood in there.

14 Q. Is it possible that larger -- how does the
15 luminol sit after it's been used? I mean, could that be
16 mistaken for cleaning solution, or what did that look
17 like?

18 A. I'm -- I'm not quite sure I'm following your
19 question, if you could help me out.

20 Q. What leads you to believe there was a blood
21 event in that -- I'm sorry. I can't read this writing.

22 What do you know about luminol? Does it
23 interact with any other substance other than blood?

24 A. I don't know everything about luminol.

25 Q. Do you know if it --

1 A. It reacts to blood --

2 Q. -- interacts with urine?

3 A. I don't know.

4 Q. Do you know if it interacts with cleaning
5 products?

6 A. I will say that in looking at the photos from
7 forensics with the luminol, the luminol areas -- and you
8 can obviously -- I'm sure you can view these photos.
9 It's -- it takes up a large portion of the floor that
10 coincided with the darker stain that we observed. That
11 darker staining would not be consistent with the urine.
12 That darker staining would not be consistent with -- I
13 don't know whether it would be consistent with a
14 cleaning product.

15 So, again, I don't know exactly every area that
16 forensics processed with phenolphthalein to do the blood
17 presumptives, but I do know that blood was found in the
18 bathroom, and through PCSO it was later identified to
19 Mr. Cozzi's blood. So I would refer back to forensics
20 because they are the experts when it comes to luminol
21 and that processing. They know exactly where they took
22 the swab from and can testify to all that.

23 Q. During your walk-through with Supervisor Murphy
24 and Camacho with PCSO, did you discuss with them whether
25 the luminol was showing something other than blood?

1 A. I don't have any recollection of that.

2 Q. If you --

3 A. I would imagine that ever -- through their
4 training and experience, I would imagine that they would
5 document the most prudent and accurate representation of
6 what they discovered in the crime scene they
7 investigated.

8 Q. Are you aware that bleach can sometimes cause a
9 positive luminol reaction?

10 A. I don't know what causes false positives for
11 luminol. I don't have that information. I would
12 imagine that if this was a false positive with cleaning
13 agents, the entire floor would be stained and not just a
14 large puddled area. And then the luminol was also on
15 the sides, and I believe -- let me see if I've got a
16 photo of that.

17 I believe it was in the area that -- again, it
18 popped in the area where the paint was coming off, too.
19 So if it was a false positive with a cleaning reagent
20 that was used to clean the bathroom every day, I would
21 assume that the entire floor would glow with luminol and
22 not just the stain, the dark-stained area that had the
23 swirls and the smearing that we observed with our naked
24 eye.

25 Q. And that -- but that's also assuming that

1 luminol was -- did, in fact, cover the entire area?

2 A. Again, I -- that's why I said I would revert to
3 the forensic technicians, because they're obviously the
4 experts in the field. They have all the information
5 with their training and experience. They've
6 investigated hundreds of crime scenes, if not more. I
7 know Supervisor Murphy and Camacho have been doing this
8 for a very, very long time.

9 Q. So I think where they're trying to get with
10 this question is, when you see the bathroom both before
11 the processing and after the processing, before it was,
12 oh, there's a little bit of blood. Nobody was terribly
13 concerned that something massive had happened in that
14 bathroom, right, but then --

15 A. Well, so --

16 Q. -- as --

17 A. I don't mean to interrupt you. Go ahead.

18 Q. No, go ahead. Go ahead.

19 A. I would say that what was immediately
20 observable as far as blood was the blood that was
21 located, the swipe on the exterior of the door, the
22 droplets on the partition, and the smearing under the
23 toilet.

24 Q. Okay.

25 A. Upon closer inspection -- and Detective Bolton

1 was in the bathroom and came to me when I entered this
2 bathroom a second time. He was the one that had
3 initially found that large staining with the circular
4 motions in the stall. And so, obviously, the floor is
5 dark, so looking at that further, when you take -- when
6 you take a good look at it, you're like, oh, wow, there
7 is something here.

8 We looked further at that. What we saw with
9 our naked eyes is what ended up popping with the luminol
10 in the photographs. And so, yes, when I first went in,
11 what I saw immediately was contrast; right? Brown,
12 white, brown, tan. Detective Bolton did a very good
13 inspection and located the smearing and the swirling,
14 you know, on the floor and brought that to my attention.
15 And we looked in and we were like, yeah, this is -- this
16 is somewhat concerning. And I contacted my supervision
17 to have the entire team respond so we could start an
18 in-depth investigation.

19 Q. Okay. Do you know Edward Jarzembowski?

20 A. That name does not ring a bell.

21 Q. 2640 Woodhall Terrace in Palm Harbor?

22 A. That name does not ring a bell with me.

23 Q. Okay. There is a fingerprint in the southeast
24 office on Belcher that belonged to him.

25 A. I believe detective -- I believe Detective

1 Bolton followed up with him.

2 Q. And you're not aware of what came of that?

3 A. I don't -- no, I'm not.

4 Q. Are you aware of whether or not that individual
5 has any connection with the vet or Blanchard Law or that
6 office building?

7 A. I would follow up with Detective Bolton.

8 Q. On the evening of March 22, 2023, Detectives
9 Wagoner, Sinni, and Wedin conducted a drive-by at
10 511 Seaview and a neighborhood canvass around
11 511 Seaview.

12 Who ordered that surveillance?

13 A. I don't recall. I know that on Thursday -- on
14 Thursday evening they did a drive-by.

15 Q. On the 22nd?

16 A. Okay. That's Wednesday. So on Wednesday the
17 22nd. I know that was the date that we had located the
18 truck on Klosterman with the Flock camera.

19 The entire team met up near at Klosterman, and
20 I don't -- we had discussed going by Dr. Kosowski's
21 residence, because he obviously had been named by
22 multiple people that the incident that had happened, the
23 deposition, and the vehicle had made it up to Tarpon
24 Springs by his home. I think we just went by to see if
25 the truck was parked outside or anything, but -- to see

1 if it was leading to his residence.

2 Q. And was there anything notable?

3 A. I didn't go there. So we --

4 Q. Okay.

5 A. -- I mean, when we ended that evening, we had
6 not finished gathering all the surveillance. And we
7 picked up the next day through the neighborhood --
8 through his neighborhood to kind of -- he's the only
9 person that was listed as having an issue with
10 Mr. Cozzi.

11 The vehicle goes from Largo to Tarpon Springs
12 heading in that area. I believe we went into the
13 neighborhood to gather surveillance to see if the truck
14 went through the neighborhood. Detectives located
15 surveillance there. I know Detective Compton was the
16 one that located the surveillance from the neighbor just
17 to the south of Mr. Kosowski's residence.

18 Q. Are you aware of whether or not they got out of
19 their vehicles on either one of those days? I mean,
20 were they going to houses on those days to collect
21 video?

22 A. On Thursday when we went up there, I know that
23 we were -- detectives were canvassing the area looking
24 for surveillance on homes. And, yes, we got -- I didn't
25 get, personally, surveillance from any of the homes, but

1 I would imagine that they got out of their vehicles to
2 go speak with the homeowners to ask them if they could
3 review their surveillance and things like that.

4 Q. And that was on Thursday, the 23rd?

5 A. I believe so, yeah.

6 Q. Rewind to the 22nd. Do you -- I know you
7 weren't there, but do you know what the purpose of --
8 I -- driving by to see if there was a truck, or they
9 were, do you know if anyone got out of their vehicles
10 and walked around the Seaview property, or no?

11 A. No.

12 Q. You don't --

13 A. My visit to the Seaview property was on
14 Thursday. I responded with Detective Bolton. I used
15 his work phone, put that in my pocket, and we attempted
16 to do a contact at the front door, but that was my first
17 time, was on Thursday.

18 Q. Okay. Were you given any information from
19 Detective Wagoner regarding his surveillance on the
20 22nd?

21 A. No, I don't believe so. From my understanding,
22 they didn't locate the vehicle at the residence and were
23 coming in the next day to continue the surveillance, to
24 try to get surveillance from neighbors and things like
25 that.

1 Q. So Detective Wagoner says that on the 22nd,
2 after canvassing the neighborhood, he assisted in
3 securing the house.

4 Do you know what that was about? What did he
5 mean by "securing the house"?

6 A. You'd have to ask him.

7 Q. Okay.

8 A. I think we -- I think we talked about -- and
9 I'm just trying to go on my memory, so I apologize. I
10 think we talked about maybe using some of our undercover
11 units for surveillance. I don't recall if that was ever
12 done or not. So Detective Bolton would know, being the
13 case agent, or Lieutenant Lomonaco. She was the
14 supervisor.

15 Q. Okay.

16 A. And, again, I'm trying to remember four
17 years --

18 Q. That's okay. I know they're in other reports.
19 I just --

20 A. Yeah, yeah.

21 Q. -- you know, want to know if you were made
22 aware of anything.

23 A. I don't remember. That doesn't ring a bell.

24 Q. Okay. So Detectives Sinni and Wedin didn't
25 report to you anything about the surveillance on the

1 22nd?

2 A. I don't have any independent recollection of
3 that, no, ma'am.

4 Q. At what point did you become aware that
5 Dr. Kosowski was not at home at the 511 Seaview?

6 A. When we went on Thursday to knock on the door
7 and there was no answer.

8 Q. Okay. If detectives were -- and I know you
9 don't know for sure, but if anyone was sent to the
10 Seaview property on the 22nd to perform surveillance,
11 canvass, otherwise, would that be -- whatever they were
12 doing, would their body cams be something that would be
13 worn and activated during that kind of surveillance?

14 A. Typically, we would activate a body camera
15 during an interview with a person or a member of the
16 public and things like that. I know we had just
17 recently gotten body cameras just before this case, but
18 I wouldn't -- I would not think that it would be normal
19 practice for somebody that was -- if somebody was, you
20 know, in a vehicle conducting surveillance or stuff like
21 that to have a body camera activated.

22 Q. Do you know if there were any pictures taken on
23 the 22nd?

24 A. I'm not aware of any pictures taken on the
25 22nd. I took some photographs on the 23rd with

1 Detective Bolton. We did enter a preserve area to the
2 north of Dr. Kosowski's residence. When we had been
3 walking through the driveway and going up to the front
4 door, I obviously had his -- there's an application on
5 the phone where you can turn the cell phone into a body
6 camera. And I was wearing a dress shirt, so I put it in
7 my pocket. That way we could record our contact if we
8 made contact with Mr. Kosowski at his residence.

9 When we were walking down the driveway, we had
10 noticed some track marks to the north, kind of through,
11 like, some shell area, through, like, sand shell through
12 the side yard. In the preserve, you could see kind of
13 through the fence a track area that kind of led back to
14 the pool area.

15 So didn't know what it was at first, and
16 looking at it and going back to the pool, I -- we kind
17 of assumed it might have been, like, a pool guy's
18 equipment that they have on wheels and stuff like that
19 to take in the side yard.

20 I know I had taken a couple pictures from the
21 preserve area. I also took some pictures from the dock
22 area of the neighbor to the south. All of those
23 pictures were uploaded. They're in a file I think
24 titled "Detective Bolton iPhone." It's in evidence.com.
25 You can refer to those.

1 Q. The knock-and-talk on 3/23, that was done by
2 you, Detective Bolton and Allred and Wedin; right?

3 A. So a knock-and-talk was done by me and
4 Detective Bolton. We were the only ones that went up to
5 the front door. Detective Wedin and Allred were present
6 at the residence.

7 Q. Did you bring a property map along with you on
8 the knock-and-talk?

9 A. No. So Detective Wedin had looked online on
10 the property appraiser's website and had noticed that
11 the property -- you know, it appeared that
12 Dr. Kosowski's property was fenced in.

13 Q. Did you even need GPS guidance when walking on
14 the premises?

15 A. No.

16 Q. Did you search the backyard?

17 A. No, I never entered the backyard. I could see
18 Bolton to the backyard from the neighbor, but I never
19 entered the backyard of the residence.

20 Q. Do you know if anyone entered the backyard at
21 the time?

22 A. No, not at the time that we were there, not to
23 my knowledge. I believe a number of officers were
24 placed in the backyard when we were serving the search
25 warrant, but I don't know who or how many.

1 Q. Were you aware of any easements and where
2 property began and ended in that backyard?

3 A. In looking at his property, it appeared that
4 his property was fenced in. So I'm -- I am under the
5 impression that when I was in the nature preserve I
6 wasn't on his property whatsoever.

7 Q. Are you aware of whether Detective Bolton took
8 any photos of the backyard?

9 A. I don't know. Again, I used his iPhone. He
10 unloaded them in. Nothing was determined to be of any
11 evidentiary value even. We didn't, you know, see
12 anything, didn't -- nothing obvious, but he kept them
13 because the photos were taken.

14 Q. And those -- in those photos, did you take
15 pictures of the backyard, or no?

16 A. So I've got the photos right here. Give me one
17 second. I think it's called Bolton. I -- there's a
18 photo with the iPhone photos. I don't know if it's
19 Bolton's iPhone photos or whatever. I recall taking the
20 photographs from the preserve. There's, like -- there's
21 a fence, so I kind of went to the fence and took photos
22 there. I took those. There's sand and everything. You
23 can see the track marks.

24 There's one photo, like, you know, I'm out and
25 you see the fence, and then I put the phone up to the

1 fence. So it is kind of looking through the chain link
2 fence. So I'm on the nature preserve side of the fence.
3 I don't believe that that's Dr. Kosowski's property to
4 the west of the ramp.

5 So, again, like, I took photos of the preserve
6 because I had his phone from doing the knock-and-talk.
7 And then when we went next door to the -- I took -- I
8 think -- I think I took pictures of the preserve, too.
9 Then I took some pictures from the neighboring resident.
10 We walked around on the paver sidewalk with the neighbor
11 into her backyard. You can see me, you can see the
12 pictures, you can see Dr. Kosowski's fence. I'm on the
13 neighbor's fence. I can see in the backyard. I took
14 some pictures of that.

15 In the neighbor's yard, you can kind of see it
16 delineates with those photos Dr. Kosowski's property
17 has, like, shell, the neighbor has grass. I stayed on
18 the grass area. Like I said, I'm fairly confident we
19 never entered his backyard, and I took those photos from
20 a distance.

21 Q. At what point did the Axon Capture app come
22 out? Like, at what point did you start using the camera
23 app?

24 A. I'd have to check for you. So I know we had
25 recently gotten body cameras that had rolled out.

1 Patrol started using them. Detectives were given them.
2 I think we got the -- I don't know, because the app
3 has -- the app is kind of neat. It's got -- it's got,
4 like, the ability to audio record and video record. And
5 there's a link. So, like, if you're a person, I can
6 send you the link and you can upload your own evidence
7 and stuff like that. So I can check and find out when
8 we got it. I don't know. I don't know the answer to
9 that.

10 Q. But you-all did use it in this case; right?

11 A. I think that's what we used, yeah. It was
12 the -- on the work phone. We had, like, three different
13 apps. And I think it's Axon Capture, that's what we
14 logged into. To be honest, I didn't want to be wearing
15 a body camera when I was talking to Dr. Kosowski, so I
16 figured it would be a good way to put a covert camera to
17 record our contact.

18 Obviously, there's no expectation of privacy
19 when you're talking to police, so I just kind of put
20 it -- I was the only one wearing a dress shirt, so I
21 just -- I put it in my dress shirt.

22 Q. Okay. I'm just going to read this exactly how
23 it is here.

24 Why did you not use your Axon Capture app while
25 you were walking around the 511 Seaview?

1 A. Like, while I was walking in the neighbor's
2 yard and the nature preserve?

3 Q. Mm-hmm.

4 A. I used the Capture app when we made contact,
5 because I figured -- I was hoping that Dr. Kosowski was
6 going to be home and I was trying to capture our contact
7 with him. I didn't see a need to do it.

8 Q. Why did you turn the Axon Capture app after you
9 did not get an answer at the door? I'm assuming it's
10 supposed be off?

11 A. So I kept it on. We walked --

12 Q. Okay.

13 A. I'm going off my memory. Again, we can -- the
14 Capture app would be the best documentation of it.

15 I kept it on while I was on his property. So
16 we ended up coming down to the driveway. I don't
17 remember exactly when I turned it off. But we went
18 upstairs -- we went upstairs. We tried to make contact
19 there at the front door. There's a door downstairs, so
20 we walked downstairs. We knocked on that door and there
21 was no answer.

22 We kind of -- you can see on the app, like,
23 he's got, like, slats and stuff like that. I bent down
24 to see if I could see anything in the slats, but there
25 was nothing there. And, you know, it's -- we ended up

1 going down and leaving, and we figured he wasn't home
2 and turned the Axon Capture off. Because, again, the
3 intent of it was to try to record our contact with
4 Dr. Kosowski.

5 Q. Did you-all enter the garage --

6 A. No.

7 Q. -- on the 22nd or 23rd?

8 A. I entered the garage on the 23rd after the
9 search warrant was done after the SWAT team went in.

10 Q. The 22nd?

11 A. No, the 23rd.

12 Q. Okay. But nobody entered on the 22nd?

13 A. No.

14 Q. Okay. If you didn't use GPS guidance and you
15 didn't have a property map with you, how do you know you
16 were not on Dr. Kosowski's property?

17 A. Again, in talking with Detective Wedin, he
18 pulled up the property appraiser's website digitally,
19 and it appeared that Dr. Kosowski's property was fenced
20 in.

21 Q. Okay.

22 A. So I didn't cross the fence.

23 Q. So is the fence the landmark that you used to
24 differentiate between public and private property?

25 A. That was the -- yes, that was the landmark I

1 differentiated with.

2 Q. When the east/west fence along the north edge
3 of Dr. Kosowski's property abruptly turns south, how did
4 you know you were on public versus private property when
5 taking the photos beyond the fence?

6 A. So you're talking about on the water side of
7 the property?

8 Q. East/west --

9 A. On the west side of the property on the north
10 end of his property, so at his neighbor's residence --
11 and I'm looking at the photograph right now -- it takes
12 an abrupt north turn to a boardwalk that goes out to his
13 dock.

14 Q. Okay.

15 A. In looking at the photo, it is clearly
16 delineated that the neighbor's property has grass and
17 his property has shell. That's on the same plane as the
18 fence. So I stayed on the grass area and we were the
19 neighbor. So we were with that neighbor. Detective
20 Compton was there and we were with the neighbor.

21 Q. Okay. At what time did you upload the
22 511 Seaview search warrant affidavit to CloudGavel.com?

23 A. I didn't do that. Detective Bolton did the
24 search warrant for the residence.

25 Q. Do you know what time the search warrant was

1 signed by Judge Federico?

2 A. I don't know when it was signed, but I did
3 document in my supplement when Tarpon Springs did the
4 residence.

5 Q. And who decided to use Tarpon Springs SWAT to
6 make entry into the residence?

7 A. I would imagine that that was a member of
8 command center. Lieutenant Lomonaco would be the best
9 person to ask for that.

10 Q. Okay. Prior to entry of Dr. Kosowski's home,
11 was the search warrant read out loud on the premises?

12 A. Detective Melton read the entire search
13 warrant, and he read that on his body camera. He is a
14 detective with Tarpon Springs PD, and that was
15 documented under their Report Number 23-717.

16 Q. And is that necessary when no one is home?

17 A. You know, I had received contradictory views on
18 that. My opinion is it's better to read it and not need
19 to than to not read it and have needed to.

20 Q. Okay. So regardless of whether or not anyone
21 is home, it's your opinion that it should be read prior
22 to SWAT team entering the residence?

23 A. That's not my opinion, because I don't know
24 what the legal authority is on it, but it's better --

25 Q. Okay.

1 A. -- to --

2 Q. Okay.

3 A. So I don't know what the -- like I said, I've
4 had attorneys tell me that you need to read it if
5 someone is present. I've had attorneys tell me that for
6 inanimate objects, cell phones, vehicles, stuff like
7 that, you don't need to read it.

8 I'd rather read it and not need to read it than
9 to not read and then lose something because I messed
10 something up procedurally. Again, I don't know what the
11 actual case law is with any of that.

12 Q. Okay. You noted that you could not search in
13 511 Seaview, only advise. Why could you not search?

14 A. I was told that because I do not have
15 jurisdiction in the residence that I could not conduct
16 the search -- that we could not conduct the search.
17 That Tarpon Springs would need to conduct the search.
18 My understanding would be the sheriff's office would
19 have jurisdiction in doing it as well because they have
20 jurisdiction throughout the entire county.

21 But I was notified that we could advise them,
22 because obviously those detectives had not conducted the
23 investigation. They didn't know exactly what they would
24 be searching for. We could be present for it, but the
25 actual searching would need to be done by members of the

1 Tarpon Springs Police Department.

2 And, obviously, I believe the Pinellas County
3 Sheriff's Office was included in that as well, because
4 the forensics are the ones that processed and -- just
5 innately, they search when they are conducting forensic
6 processing; right? Like searching for latents and
7 whatever evidence, and they're searching for these
8 different types of things, so they would be covered
9 under that as well.

10 Q. Now, you said that you-all are allowed to
11 assist. In other words, to walk around and kind of
12 guide them; is that right? And I might be -- don't let
13 me put words in your mouth. But I think you said
14 because they didn't know exactly what they were
15 searching for. Correct me if I'm wrong, the search
16 warrant would spell that out for them; right?

17 A. Absolutely. However, everything that could be
18 evidence in this crime may not -- we may not have known
19 at the time that we wrote the search warrant; right? So
20 I might see something and be like, oh, that links up to
21 this. So it's important that somebody who has some
22 knowledge of the investigation be present in case
23 there's something there that's obvious that, oh, that
24 could have been an instrument with this, you know.

25 Now that we see this, we can say, oh, that's

1 what that marking was on some scene or whatever. And
2 I'm not talking specifically about this case, but just
3 cases in general.

4 Q. So can you break down your understanding to me
5 of how that all should go down? I mean, if Tarpon
6 Springs is executing the search warrant and they are
7 inside the residence conducting the search, are there
8 any other law enforcement agencies that are allowed to
9 go in the residence at that time? And, if so, how many,
10 and what's the role once you're in there besides
11 advising?

12 A. So in my opinion -- so obviously, the SWAT team
13 enters. We want to make sure -- I mean, we're
14 investigating a homicide and serving a search warrant on
15 the suspect of a homicide. So I --

16 Q. Which we all know is dangerous. We see it
17 every day in the news.

18 A. Absolutely. Which is why we want to have the
19 SWAT team there. And my understanding is with the
20 amount of firearms in a residence, all that sort of
21 thing, it was a good thing. I mean, Dr. Kosowski wasn't
22 there, but there was firearms strewn throughout that
23 residence, which shows the importance of why the SWAT
24 team was there. After that --

25 Q. Did you -- let me stop you there so I don't

1 forget.

2 Did you-all know that there were weapons inside
3 prior to entering the home?

4 A. I wasn't aware of anything like that.

5 Q. Okay.

6 A. But in hindsight, we found all of those things,
7 and -- which is why we -- which is why we're so prudent;
8 right? Because we're entering an unknown. We don't
9 know what we're walking into.

10 Q. Sure.

11 A. We know about the stuff on the side
12 investigations, this is the suspect's residence, so we
13 have to be super careful and safe. After the scene is
14 secure, we would want to do any forensic processing,
15 because, obviously, that would be very important, and to
16 safeguard that process.

17 So we listed Pinellas County Sheriff's Office
18 on all of our warrants, to my knowledge, for the
19 residence, the Corolla, the body warrant that we secured
20 for Dr. Kosowski, so crime scene with the Pinellas
21 County Sheriff's Office would be able to be in the
22 residence.

23 I believe we were -- I don't want to say that.
24 So I would refer to the warrant for all who was listed
25 on there, but Tarpon Springs was listed on there because

1 it was their jurisdiction; they are the ones that
2 conducted the search. We are the affiants for the
3 warrant. We would be able to be in there.

4 And I'm of the opinion, you know, what we tend
5 to do on our search warrants is when we're searching for
6 evidence after forensics has been done, we come in,
7 divide and conquer; right? So, like, different
8 individuals would be tasked with searching different
9 areas. So I wasn't present during the searching portion
10 of the residence. I had left later on in the morning.

11 In fact, I left before crime scene had
12 finished. I did enter Dr. Kosowski's residence after
13 the warrant was hit, but I only stayed on the lower
14 level. I did the initial sweep with Detective Nolan. I
15 never entered the residence portion on the upper level
16 of the home, so I don't know how they did that.

17 But I know for us, when we do search warrants,
18 you know, one person will search one room, one person
19 will search another room, you know, that way they can
20 systematically and methodically search that area. If
21 items of evidence are located, then we would have
22 somebody document that, photograph it, collect it, those
23 sorts of things. So I don't know how they did it that
24 evening because I wasn't present for it.

25 Q. Okay. When you stated in your report that you

1 couldn't search and you were only there to advise,
2 what -- why was that? Is that because Tarpon Springs
3 was on the warrant?

4 A. My understanding, and we were advised by the
5 State Attorney's Office that there was case law that
6 indicated that the agency of jurisdiction would be the
7 ones that would have to do the search, and that we could
8 be present to advise, again, to ensure that the things
9 that were listed on the warrant, if they were located,
10 got collected, or if something stood out to us during
11 the course of our investigation that we discovered was
12 now something of evidentiary value, that could be
13 articulated to that agency so a thorough investigation
14 could be conducted.

15 Q. So when Tarpon Springs goes in to kind of clear
16 the area, once it's secured, they reenter to conduct the
17 search. Do they reenter with whoever is there and
18 whoever says, "Oh, that might be good, that might be
19 good," but just the other agencies don't touch those
20 items? How does that work? How do you break that down?

21 A. I know that I went in. I didn't touch
22 anything.

23 Q. Okay.

24 A. In fact, I didn't put gloves on because I
25 didn't want to mistakenly pick something up and touch

1 it.

2 Q. Okay.

3 A. It's one of those things, like, if you're
4 wearing gloves, you know, you might inadvertently do
5 something that, hey, I don't have jurisdiction to do
6 this.

7 Q. Right.

8 A. So, you know, when I -- it's kind of like if I
9 don't have my binder, I like to walk around in crime
10 scenes with my hands in my pockets. That way you don't
11 get out of the -- you know, you're used to walking
12 through and touching things or whatever. I used to tell
13 my kids when we went to the store, "Put your hands in
14 your pockets; don't touch anything."

15 So I just kind of, you know, did the same
16 thing. So I know I didn't touch anything in the
17 residence when I went in. I don't really know how all
18 that would work because this is the -- this is the first
19 time that I've had to utilize this protocol.

20 So when I was a traffic homicide investigator,
21 you know, we did vehicles and stuff like that. We
22 secured the vehicles in our jurisdiction. We served the
23 warrant, then we transported to the tow yard where we
24 had a bay that was secure that we would conduct the
25 inspections and things like that.

1 I know that when I did traffic homicide, if I
2 had to collect blood from Bayfront Medical Center, I'd
3 have to list the sheriff's office or St. Pete PD in
4 that. I would respond with them and they would collect
5 it and then would provide it to me so I could, you know,
6 get it sent out to the lab and things like that.

7 So my understanding is that they would do the
8 collection and things like that and they could provide
9 it to us, but everything that was collected, from my
10 understanding, was taken by Pinellas County Forensics
11 and PCSO was listed on the warrant.

12 Q. Okay.

13 A. Does that -- does that kind of answer what you
14 were looking for?

15 Q. Yeah, I think so.

16 A. Okay.

17 Q. And some of these questions will be directed
18 to, you know, Tarpon Springs, obviously, so...

19 Let's see. I think you've already answered
20 these questions, but just so that I'm clear, did you
21 handle any firearms within the home?

22 A. No, I did not.

23 Q. Did you handle any ammunition within the home?

24 A. No.

25 Q. Did you handle any 9mm rounds?

1 A. I didn't touch anything in the house. I didn't
2 even go upstairs, so I was only in the garage portion.

3 Q. So you personally didn't take any 9mm rounds
4 with you from the home?

5 A. No.

6 Q. Are you aware of whether Dr. Kosowski had any
7 STV ProVlo ammunition in the house?

8 A. I don't know what that is.

9 Q. I don't know either.

10 What brand of the cart did you find in
11 Dr. Kosowski's garage?

12 A. I don't remember. I remember seeing a cart
13 that looked similar to what we saw in the surveillance
14 video. I don't recall going on down and looking at what
15 brand it was. My guess would be forensics would
16 photograph that, and hopefully they would photograph
17 what brand and things like that it was.

18 Q. Did you question witness Christina Greene on
19 the cart in the electrical closet back at the office?

20 A. No.

21 Q. Are you aware of the type of cart that she
22 found in there?

23 A. I know that -- my understanding is that we have
24 a brand, but I don't have an independent recollection of
25 that.

1 Q. Was the garage door to 511 Seaview open prior
2 to the search warrant being read on scene?

3 A. So they hit the house. I -- Tarpon had their
4 body cameras on. I don't know if -- I don't know if
5 they opened the garage door or not prior to the warrant
6 being read. I don't see what it would matter one way or
7 the other.

8 Q. Okay.

9 A. But, again, I know that the SWAT team had their
10 body cameras on, so I would defer to those.

11 Q. Was it determined that Dr. Kosowski was in
12 Miami at the time of the search warrant?

13 A. Going off of my recollection, I believe there
14 was a Flock hit for his Corolla. I don't remember where
15 that was at.

16 Q. Given that Dr. Kosowski was thought to be in
17 Miami and the house was thought to be empty, was
18 consideration given to reading the search warrant at the
19 scene prior to the SWAT entering, or no?

20 A. No.

21 Q. And why not?

22 A. I -- let me rephrase that.

23 I don't know. That would be -- that would be
24 something that command staff would make a decision on.

25 Q. This might be the same answer, but I'm going to

1 ask it. Was consideration given to telephoning
2 Dr. Kosowski and asking him to grant access to his house
3 to eliminate the need for SWAT team entry?

4 A. I don't know if consideration was given for
5 that or not. I think in a case like this where we're
6 trying to locate Steven Cozzi's body, it would be -- an
7 element of surprise would preserve the investigation and
8 would allow us to hopefully recover the most evidence
9 possible, but I don't know if command staff gave
10 consideration to that or not.

11 Q. Prior to the execution of the search warrant,
12 was there a multi-agency briefing?

13 A. I don't recall. I know that we were on scene
14 for most of -- I mean, most of the day and evening.
15 That would be a good question for command staff. I did
16 not participate in a multi-agency briefing that I can
17 recall.

18 Q. Did you participate in a Largo briefing; and,
19 if so, when and where?

20 A. Yeah, we discussed, you know, that we were
21 going to have to get Tarpon Springs. I'm sorry. I'm
22 trying to recall.

23 Q. It's okay. I know it was a long time ago.

24 A. Yeah. I apologize. I don't have any -- I
25 don't remember. I apologize.

1 Q. So if there was a Largo Police Department
2 briefing, are those held at one of the department
3 locations? I know you have a few satellite locations.

4 A. So yeah, we don't have any -- well, I guess we
5 have, like, an office. We don't -- we're not like
6 Clearwater where they have, like, a big building
7 someplace. We've got, like, an office --

8 Q. Right.

9 A. -- that we use. We've got a sector office, but
10 it's not used for stuff like that. It's kind of just
11 used for guys to eat lunch at. So we didn't leave the
12 residence and come back here. I'm trying to remember,
13 and I apologize. I don't -- obviously, I don't want to
14 make anything up.

15 Q. That's okay. If you don't remember, that's
16 fine. We can --

17 A. It was like -- on a normal search warrant --
18 like, this wasn't a normal search warrant, though. So
19 on a normal case, we would meet at the police
20 department, we would do a briefing with the SWAT team,
21 we would show, you know, exterior pictures.

22 And, you know, sometimes we're able to go on,
23 like, Zillow and things like that and get, like,
24 pictures from the inside of the house that kind of show
25 a layout. Sometimes you can get layouts on, like, the

1 property appraiser's website or, like, you can get,
2 like, a layout of the residence, like, if you reached
3 out to Pinellas County. Like, let's say, someone did
4 construction or something like that.

5 So we would -- we would typically do briefings
6 like that for search warrants. I don't -- I'm pretty
7 sure that I stayed on in the area for most of the day.
8 I know there's a little park to the north, like, on the
9 other side of that -- that little wetlands area that was
10 right north of Dr. Kosowski's residence. There's a park
11 right there. Maybe we went over there. I don't
12 remember. I apologize.

13 Q. Okay. So this question, I think there's an
14 obvious answer to it but I'm going to ask it.

15 Why was Tarpon Springs Police Department
16 assistance specifically required?

17 A. They were the agency of jurisdiction.

18 Q. Okay. And can you list all Largo Police
19 Department personnel involved in this search that night?

20 A. I can't because I wasn't present for that
21 portion. I entered the residence with Detective Melton,
22 the detective sergeant. I'm trying to recall his name.
23 Sergeant Crawford. Detective Bolton was with me as
24 well. The four of us entered the lower level, which
25 contained the garage that had the Toyota Tundra in it.

1 But other than that, I stayed on scene for a
2 little while. Forensics began to process. I had been
3 up for a very long time throughout the course of the
4 week and ended up leaving prior to forensics finishing
5 before the Tarpon Springs Police Department entered to
6 do the search of the upstairs of the residence.

7 Q. Okay. So the only other agency involved aside
8 from Largo and Tarpon Springs is Pinellas County
9 Sheriff's Office; correct?

10 A. In reference to the search warrant?

11 Q. To the search, mm-hmm.

12 A. Correct. It would have been the forensics
13 division to my knowledge.

14 Q. Okay. So do you recall what time you arrived
15 on scene on the 23rd and what time you left, or do you
16 have that documented in your report?

17 A. I don't have it documented in my report. I
18 believe we arrived on scene at 11:25. We tried to make
19 contact at the residence, Detective Bolton and I. And I
20 apologize. I don't -- I left in the early morning hours
21 of Friday morning. Maybe like 2:30 or so, if my -- if
22 I'm guessing. Maybe 3:30. I don't know. It was very
23 early in the morning.

24 Again, we were -- my role in entry into
25 Dr. Kosowski's residence was captured on Detective

1 Bolton's body camera. And then I was just outside. I
2 went out -- we brought the command bus out. I sat on
3 the command bus for a little bit. I sat in my vehicle
4 and I was falling asleep, so I went home to get some
5 rest.

6 Q. Do you recall who was responsible for keeping
7 up with the search warrant inventory, the items that
8 were collected? Was that Tarpon Springs?

9 A. I wasn't present for any of that, so...

10 Q. Okay. Let's see. Was ATF present?

11 A. I don't know. I don't recall seeing any ATF
12 agents there. From my understanding, the ATF got
13 involved later on. Detective Compton, I believe, worked
14 with them.

15 Q. Do you know --

16 A. Because we didn't -- we didn't know about all
17 the firearms and things like when we served the search
18 warrant.

19 Q. Right.

20 A. And I think that after we were made aware of
21 that and things like that, I think the ATF got involved
22 for the residence in Tarpon Springs.

23 Q. What happened with the firearms that were found
24 that night, if you know?

25 A. I wasn't present for that, so you'd have to ask

1 one of those other --

2 Q. Okay. Were you made aware of any tax stamps
3 that were removed from the home?

4 A. I'm not aware of anything.

5 Q. Was there an enclosed trailer that was opened?
6 Do you remember seeing a trailer?

7 A. I do recall seeing a trailer. It was not
8 opened while I was on scene. I don't know when and if
9 it was opened.

10 Q. Okay. Are you aware of lingerie that was found
11 in the house?

12 A. I didn't go upstairs.

13 Q. Did you wear shoe covers when you were in the
14 garage?

15 A. No, I did not.

16 Q. What shoes did you wear when you entered the
17 garage?

18 A. So I was wearing a different pair of shoes than
19 I wore on Tuesday. I think there were a pair of Cole
20 Haans. I still have them. They are tan wingtips, and
21 my shoes are captured on the Axon Capture video when we
22 attempted contact with Mr. Kosowski, and that was the
23 same day as the search warrant. It's captured on
24 Detective Bolton's body camera as well.

25 Q. Are you aware of whether Detective Bolton had

1 shoe covers on while searching within the garage?

2 A. While we were entering the garage, I don't
3 believe that he had shoe coverings on, no.

4 Q. Okay. A lot of these questions have to do with
5 the search of the upstairs, so I'm skipping over those
6 since you did not participate in that.

7 Do you know about the -- a group of Largo
8 Police Department personnel gathering in front of
9 511 Seaview prior to the SWAT team entering?

10 A. Yeah. I think all of us were there in the area
11 waiting for the warrant to be served.

12 Q. Okay. Approximately how many people?

13 A. I think most of the detectives were there.

14 Q. Okay.

15 A. I -- I apologize. I don't want to say someone
16 was there and they weren't or say that they weren't
17 there and they were. I don't remember who all was
18 there. It was a while ago.

19 Q. I think where they're getting with this is
20 that, you know, there's -- there's a SWAT team --
21 there's a need for SWAT team to enter because you want
22 to create this element of surprise, but yet there's, you
23 know, a swarm of Largo detectives standing in the front
24 yard waiting on the SWAT team to get there.

25 So, you know, like, where's the element of

1 surprise when you've got that group, so then what
2 becomes the need for the SWAT team if you've lost that
3 element anyway?

4 A. Yeah, I can understand where they're going with
5 that. I don't know that the SWAT team is only utilized
6 for the element of surprise. So I think that, first and
7 foremost, they have better equipment, better gear, they
8 have more training involved in residential building
9 clearing. They have -- I mean, it's special weapons and
10 tactics; right? So they have a higher level of training
11 than the average officer or detective.

12 So I think there's probably a myriad of reasons
13 why they were chosen. That's a question that's for
14 somebody that's much higher than my pay grade.

15 Q. Got it.

16 Did you take part in the examination of the
17 Toyota Tundra?

18 A. Detective Bolton, myself, Detective Melton and
19 Sergeant Crawford did take a look inside the Toyota
20 Tundra when we were in the garage, yes. As far as the
21 processing of that vehicle and things like that, I
22 wasn't in the garage when that happened and forensics
23 did all that. But I did make observations in the trunk
24 of the Tundra if that's -- if that's where you're going
25 with this.

1 Q. Yeah.

2 What were your observations?

3 A. Well, I saw what appeared to be blood on the
4 back tailgate. That was photographed later by
5 forensics. And there was kind of some -- like some
6 staining in the bed of the truck. I've got some
7 pictures right here that I'll just refer to so I can
8 give you the most accurate description of them.

9 So the truck did not have the New Jersey tag on
10 it that we observed in Flock, but it did match the
11 general description with the black rims, the red Tundra
12 printing on the back. And then inside the tailgate,
13 there was droplets of a red liquid substance that
14 appeared to be blood. My understanding is that it was
15 later presumptively positive for blood and when
16 forensics tested it.

17 Q. Did you see the truck being loaded onto the tow
18 truck?

19 A. From the residence --

20 Q. Yeah.

21 A. -- when it was taken?

22 I don't -- I don't recall that. I don't know
23 when it was taken. I didn't document it in my report.
24 I would -- I know that on Saturday when we served the
25 Corolla warrant, I asked for Detective Allred to

1 maintain custody of the Corolla and to follow it back to
2 forensics after they sealed the -- they sealed the doors
3 and everything. So I would imagine that a detective
4 followed the Tundra there, but I don't know who that is
5 or that -- that would be -- that's what I would have
6 done.

7 Q. So you weren't there whenever they pulled the
8 truck out of the garage and put it on the tow truck?

9 A. I don't believe so.

10 Q. Okay. When is the -- that tape that you're
11 talking about sealing doors, when is that done? Is that
12 before it's moved or once it's --

13 A. I want to say that it would be -- I guess it
14 would depend on, like, where the vehicle is located and
15 things like that. I mean, it's easier to put the tape
16 on on the ground than it is on the bed of a truck. So,
17 I mean, it could be possible that, you know, there would
18 be a circumstance where the vehicle would be moved to
19 gain access to the exterior doors, you know, depending
20 on how it's parked.

21 I don't know what they did in this circumstance
22 because I wasn't present for it.

23 Q. Okay. Was Assistant State Attorney Alex
24 Spadaro there on scene?

25 A. She was.

1 Q. What was she doing?

2 A. Well, she had notified us of the necessity to
3 make sure that Tarpon Springs was involved.

4 Q. And was she there kind of to advise you on the
5 law and what you can and can't do, or do you know?

6 A. We routinely work with the State. I would say
7 that would probably be one of her functions as being
8 there. I mean, obviously, attorneys are more versed in
9 case law and -- than detectives, so I would defer to
10 her.

11 Q. Are you aware of whether or not she entered
12 511 Seaview?

13 A. She did not enter with me and I wasn't present
14 when officers or detectives entered the residence after
15 forensics was finished.

16 THE COURT REPORTER: Amanda, I'm sorry. When
17 you get a couple minutes, could we just take a
18 two-minute break?

19 MS. POWERS SELLERS: Absolutely. Let's do that
20 now.

21 (The proceedings were recessed from 3:06 p.m.
22 to 3:07 p.m.)

23 BY MS. POWERS SELLERS:

24 Q. So we left off, we're talking about the search
25 that occurred the -- that night on the 23rd, which you

1 were not a part of. There was some follow-up questions
2 that go with that --

3 A. Yeah --

4 Q. -- had you been there.

5 A. Yeah. My guess would be that search was
6 probably the early morning hours of Friday.

7 Q. Okay.

8 A. Because I left early morning hours of Friday
9 and they had not started searching the residence, so...

10 Q. Okay. Who is ultimately responsible for the
11 quality of the work in this investigation? Who was in
12 charge? Who is the -- who is everybody reporting to?

13 A. Lieutenant Lomonaco would have been the
14 commanding officer or the commanding person for the
15 agency. She was the lieutenant of the investigative
16 services division at the time.

17 Q. In multiple affidavits it was noted that the
18 Corolla seen on surveillance video did not appear to be
19 weighed down, at least by the lack of sagging over the
20 rear axle.

21 What's the significance of pointing this out?

22 A. We're being descriptive with the vehicle. It
23 may have been --

24 Q. So --

25 A. -- that --

1 Q. Not having a body in it?

2 A. Not having a body in the trunk possibly. But I
3 don't know what the weight distribution is on a Toyota
4 Corolla, so I don't know if you would see sagging or
5 not, but it was not obviously sagging --

6 Q. Okay.

7 A. -- from the surveillance video.

8 Q. Were you able to determine who was, in fact,
9 driving the Corolla just by looking at the surveillance
10 video?

11 A. Not to my knowledge. I know that the neighbor
12 had informed us that the vehicle in the surveillance
13 from her residence belonged to her neighbor, Tom.

14 Q. Okay. Did you ever trace the Toyota Tundra
15 with New Jersey plates back to 511 Seaview?

16 A. So the New Jersey plates -- and, again, I
17 didn't do this. I'm going off of my recollection from
18 being involved in the investigation. The New Jersey
19 plates were not currently assigned to a vehicle. The
20 Toyota Tundra did get linked back to the residence
21 inasmuch as after we served the search warrant and we
22 ran the VIN, it was discovered by Detective Sinni that
23 the previous registered owner had sold the vehicle in
24 cash to Dr. Kosowski and had notified the DMV of the
25 sale. Dr. Kosowski had failed to register the vehicle.

1 So it was linked back inasmuch as he was listed as the
2 purchaser by the seller, but it wasn't currently a
3 registered motor vehicle.

4 Q. And what was the starting point, the first
5 point you were able to locate the Tundra with New Jersey
6 plates from the time that it's reported that it left the
7 office building?

8 A. So there's video -- there's video of the Tundra
9 leaving the office building with the red bag with the
10 cart in the back. We did find the surveillance of the
11 truck traveling northbound on Belcher Road from that
12 Circle K from 142nd and Belcher. That's like a block --

13 Q. Okay.

14 A. -- a block north.

15 I also viewed a PSTA bus in that surveillance
16 that had traveled before the Tundra by like 10 or
17 15 seconds. From my experience with traffic homicide,
18 had some contacts at the Pinellas Suncoast Transit
19 Authority with their security division because we've
20 gotten surveillance from them in the past. So I reached
21 out to the one of the security directors, Ed Kester, who
22 was able to ascertain what bus that was and was able to
23 physically pull the surveillance from that bus the
24 following morning. So that would have been Wednesday
25 morning.

1 Officer Russell responded to get that.
2 Detectives searched that and located the Tundra passing
3 the bus in the area of Belcher and Gulf to Bay
4 Boulevard, and you can see the back of the truck.

5 Q. Is the truck traveling or parked?

6 A. It's traveling. It's traveling past the bus
7 northbound.

8 Q. (Indiscernible.)

9 A. My understanding is that the only surveillance
10 pictures that I'm aware of that depict the tag is the
11 Flock hit. Like, you don't get the tag on the bus from
12 my recollection.

13 Q. Okay.

14 A. Most of the surveillance videos with their
15 positioning, like a lot of times it's, like, facing the
16 road and things like that and it's of some distance.
17 The Flock camera, that's what it's meant for; right?
18 It's a tag reader. So Detective Gay conducted a --
19 like, a time-frame query and went through all the
20 vehicles and located it. So that's how we ended up
21 getting that tag.

22 Q. Right.

23 A. You asked me earlier about the truck. Another
24 thing of note that I kind of thought was odd is it's --
25 actually on both of his cars, Dr. Kosowski had plate

1 flippers. Like a remote control unit and, like, the tag
2 with the plate in the back, like, rotated. So you could
3 have a different plat -- you could have a different
4 plate on it and you could hit a remote and it would flip
5 the plate and show something else, like another plate.

6 So I -- you asked about, like, anything I noted
7 on the truck. So I thought I'd mention that since we
8 were talking about tags.

9 Q. Are those legal?

10 A. I would imagine that had -- I don't know the
11 answer to that. I don't know if there's --

12 Q. I don't either.

13 A. -- an answer to that. But I would imagine that
14 if you are driving -- it's not legal to affix a plate to
15 your vehicle that isn't registered to it, you know.

16 Q. Correct.

17 A. But, I mean, could there be -- I don't know. I
18 don't know if there's a specific law for it. I
19 definitely think that it is something of note.

20 Q. So he had them on both vehicles, or just the
21 Tundra?

22 A. No, the Tundra and the Corolla.

23 Q. And what was on the back of the plate?

24 A. So I don't -- there wasn't another plate on the
25 back.

1 Q. Okay.

2 A. So the tag -- and I didn't run it, but, I mean,
3 I know that the Tundra was registered. So the tag on
4 the back of the Tundra, it looks like Florida tag 70A,
5 Alpha November Quebec Uniform. And, like, when you look
6 at it, you can see, like -- you can see that -- you can
7 see that it's like a placard that comes out. There's a
8 wire going down to it. I think when forensics flipped
9 it, there was nothing on the other side.

10 Q. Okay.

11 A. I think that was the case on the Corolla as
12 well, but, again, forensics did a great job
13 photographing, documenting. I want to say -- I want to
14 say we asked them to do a video of the plate flipping.
15 But we still have the vehicles. I mean, that's
16 obviously something that can, you know, be shown.

17 Q. Did you-all find a remote?

18 A. Oh, yeah.

19 Q. Where was the remote located?

20 A. I want to say the remote that Detective Melton
21 had found in the passenger compartment, it was in there.
22 But we were able to -- we were able to actuate the tag
23 flipper.

24 Q. Okay. Thank you for bringing that up.

25 A. Yeah. Yeah. I'm sorry. You'd asked -- you

1 were asking about the surveillance and the tag. I think
2 the only one that captured anything of the tag was the
3 Flock camera.

4 Q. Okay.

5 A. That was the purpose of everything. Sorry.

6 Q. Trying to think of a different way to ask that.

7 So to your knowledge, was the search of
8 511 Seaview recorded by body cams or some kind of
9 recording device?

10 A. I'm not aware of that, no.

11 Q. No.

12 Is that something -- if Largo was going in to
13 execute a search warrant such as this where you're
14 looking for a missing person, is that something that you
15 you-all would record?

16 A. So how we do search warrants when we're
17 conducting them typically is, we go through and video
18 record the entire residence that we're going to search.
19 This is the condition that it was in. We would video
20 record all that. We would take overall photos, and then
21 as detectives found evidence, they would document where
22 it's found with photographs and do those sorts of
23 things. Typically the only video we do is the initial
24 overview of the residence has been our practice.

25 Q. So correct me if I'm wrong, but is it because

1 you-all were not leading the search, it was Tarpon
2 Springs, that's why there's no video recording done by
3 Largo of the search?

4 A. I wasn't present for the search.

5 Q. Okay.

6 A. So, I mean, if I -- I don't know. I don't
7 know. If I was on scene -- I mean, forensics would have
8 already photographed everything and done their forensic
9 investigation before any searching was done, like any
10 deep searching and things like that.

11 Q. Okay.

12 A. Obviously, like, we entered the garage and
13 looked a couple areas for a body. And then when we
14 found the blood and things like that and there was no
15 body found, then forensics was given the scene to
16 conduct their forensics investigation.

17 Q. And I'm assuming that --

18 A. And then after the initial --

19 Q. -- was after it's cleared?

20 A. -- was done, then they went and started
21 searching for any evidence of the crime and stuff like
22 that.

23 Q. Okay.

24 A. We would want to avoid, you know, any
25 unnecessary contamination and things like that for

1 forensics.

2 Q. Okay. At what point -- and this is dated
3 March 24th. At what point did you have the search
4 warrant drafted and complete but unsigned for the
5 Corolla?

6 A. So on Friday the 24th, Detective Wedin and I
7 drove to Miami, and while Detective Wedin was driving, I
8 sat in the passenger's seat and started typing the
9 search warrant for the Corolla. I worked with ASA
10 Vonderheide to do that. By the end of the day I had
11 everything drafted, ready to go with the exception of
12 where the vehicle was located; right? Because we didn't
13 want to procure a warrant if we didn't know where the
14 car was, because we'd have to get that warrant in that
15 specific jurisdiction. So just kind of getting our
16 ducks in a row to be able to streamline things once the
17 car was located.

18 Q. Was the completed draft ready on the morning of
19 the 24th?

20 A. No, I started it on the 24th.

21 Q. Okay. How many --

22 A. I ended up staying -- I ended up staying home.
23 I'm sorry. I ended up going home the early morning
24 hours, so technically that would have been Friday,
25 the 24th, that I went home. I got some sleep. I came

1 into the office 8:00, 9:00. We decided that there
2 were -- we had located some residences that were linked
3 to Dr. Kosowski in Miami.

4 Detective Wedin and I decided to go to Miami to
5 see if we could locate the Corolla. And then while we
6 were driving down there, I was typing the warrant. And
7 I want to say I finished it while we were in Miami.

8 Q. Okay.

9 A. And then, obviously, we were -- we had to wait
10 to find out where the car was before we could do
11 anything, because if it wasn't in Pinellas County, we
12 wouldn't have used CloudGavel. We would have to be
13 co-affiants with whatever jurisdiction the vehicle was
14 located in.

15 Q. Right.

16 Do you know how many BOLOs were issued for this
17 case?

18 A. I don't.

19 Q. Who would know the answer to that?

20 A. I would --

21 Q. I think there were three.

22 A. I would imagine Detective Bolton would know
23 that because he is --

24 Q. Okay.

25 A. -- the lead. I know that Detective Allred

1 generated and disseminated a BOLO in reference to our
2 agency being notified and contacting me with the Corolla
3 or Dr. Kosowski.

4 Q. Okay.

5 A. I talked to Detective Allred to ensure exactly
6 what was put in that BOLO. I don't have the BOLO in
7 front of me.

8 Q. Okay. Let me see if I can find those BOLOs.
9 Actually, you know what? We're going to save those
10 questions for Bolton and Allred.

11 A. Okay.

12 Q. So it looks like there was an officer safety
13 BOLO, a truck BOLO, and a request for tips BOLO.

14 A. Okay.

15 Q. And did you anticipate seizing the Corolla and
16 arresting Dr. Kosowski at the same time given that there
17 was no PC at the time?

18 A. You'll have to talk to Detective Bolton about
19 when he developed PC.

20 Q. Okay.

21 A. My -- my intention was to seize the Corolla for
22 the search warrant.

23 Q. So if you came in contact with Dr. Kosowski at
24 that time, you wouldn't have arrested him; you would
25 have just said, "Here, I'm here to seize this Corolla.

1 I have a search warrant"?

2 A. I'm not the case agent. I would -- I would
3 defer to Detective Bolton for that.

4 Q. Okay. Okay. When did you first make contact
5 with Dr. Kosowski?

6 A. When did I first make contact with him?

7 Q. Mm-hmm.

8 A. Well, it would have been on Saturday. We
9 responded, Detective Bolton and I, to 34 West Orange
10 Street at around 3:20 in the afternoon. Tarpon Springs
11 had located the vehicle and had effected the traffic
12 stop, and he was secured in a Tarpon Springs cruiser. I
13 started to get the warrant done.

14 I know that at one point I made contact with
15 Detective Bolton with Dr. Kosowski. He wanted to use
16 the restroom, and so we -- before we gave him the
17 opportunity to do that, got him to the Tarpon Springs
18 Police Department so he could use the bathroom. I
19 believe that was the first contact I had with him.

20 I do know that every contact that our agency
21 had with him was captured on body camera. We used
22 Detective Wedin's body camera. And so I would refer to
23 all those, because all of our contacts with him is
24 captured on that for the exact timings and things like
25 that. But off of my recollection, I believe the first

1 time I personally made contact with him was during his
2 request to use the bathroom.

3 Q. Okay. And in relationship to him using the
4 bathroom, when were his Miranda rights read?

5 A. So well before that.

6 Q. Okay.

7 A. So he was advised of Miranda by Detective
8 Bolton when he made contact with him. Him and Detective
9 Allred made contact with Dr. Kosowski. I was busy
10 trying to get the warrant taken care of in CloudGavel,
11 so the two of them made contact with him. My
12 understanding is he invoked his rights and no
13 questioning was conducted.

14 Q. Okay. So at what point was he under arrest
15 exactly, or is that a Bolton question?

16 A. That would be a Bolton question.

17 Q. Okay. Did you hear Dr. Kosowski ask for a
18 lawyer?

19 A. No, I was not present for that. During one --
20 during one contact with him after he had used the
21 restroom, he asked some questions about some things, and
22 we were, you know, answering any questions we could for
23 him. It was reiterated that we knew that he wanted to
24 have counsel. And then when he -- Detective Bolton
25 asked if he can get some demographic information from

1 him and things like that. And during getting that
2 demographic information, he -- I was present when he
3 asked to not have any further questions asked.

4 We weren't asking questions about, you know,
5 the incident or the crime or any of that; just getting
6 demographic stuff. So I was present for that, but I was
7 not present for the Miranda.

8 Q. And once an individual says, "I don't want to
9 talk, I want an attorney," what is your responsibility
10 regarding access to a phone, access to an attorney?
11 What is your responsibility at that point?

12 A. Well, we're not allowed to, obviously, ask him
13 any questions or things like that. All questioning must
14 cease. And I think a lot of it is dependent upon what
15 the individual is requesting. At the time we were
16 procuring a body warrant for Dr. Kosowski. We weren't
17 going to ask him any questioning, so he's welcome to
18 contact his attorney at his leisure.

19 I've had cases in the past where individuals
20 have wanted to conduct an interview with me, and they've
21 expressed that to me they just want an attorney present.
22 And I've provided them the opportunity to provide an
23 attorney so that we could conduct an interview.

24 Q. Was he allowed to use the phone to call an
25 attorney?

1 A. He did not. He was not given that opportunity
2 on the scene, no.

3 Q. Okay.

4 A. But, again, his -- my understanding -- this
5 will be a Bolton question. My understanding is is that
6 he invoked his rights, didn't want to speak to us,
7 wanted an attorney. If he had -- I can't speak for
8 Detective Bolton, but, again, I've had instances where
9 people have said, "I want to talk to you, I just want to
10 have a lawyer present."

11 I'm happy to do that. If you don't want to
12 talk to me, there's no reason to have a lawyer come to
13 the scene. You know, you can contact your attorney at
14 your leisure and do what you need to do.

15 Q. Okay. Do you know how -- approximately how
16 many times did you hear Dr. Kosowski ask for an
17 attorney?

18 A. I would refer to the recordings. I -- again,
19 off my recollection, he asked to stop questioning when
20 we were getting demographics, and I wasn't present for
21 him for the attorney request with Miranda. I know that
22 we had mentioned to him, "Hey, we know that you don't
23 want to talk to us, you want an attorney present, that's
24 fine." He asked some questions about like, "Hey, what's
25 going on?" We answered all the questions that we could

1 for him to the best of our abilities.

2 Q. And had he said, "Look, let me find an attorney
3 and then I can -- I can talk to you guys," would he then
4 have been allowed to use a phone to try to make some
5 phone calls?

6 A. After the body warrant was procured and served,
7 I wouldn't have had a problem staying with him and doing
8 that.

9 Q. When was the body warrant secured and served?

10 A. So, unfortunately, we had just started using
11 CloudGavel, and there were only certain templates that
12 were in the database in the system. So we had attempted
13 to do the warrant in CloudGavel, and Detective Moore
14 took that responsibility on, and CloudGavel was giving
15 us a lot of issues.

16 My understanding is they had reached out to the
17 IT department with CloudGavel to try to get that fixed,
18 and they ultimately had to hand-walk the warrant.
19 Detective Moore arrived on scene early Sunday morning at
20 around 12:50 a.m. on the 26th at that point with the
21 true copy of the body warrant that had been signed. And
22 then we responded to Tarpon Springs to effect the body
23 warrant, so --

24 Q. Okay.

25 A. -- I believe Dr. Kosowski was -- would have

1 been afforded the opportunity to talk to an attorney to
2 conduct an interview and things like that.

3 Due to the nature of the body warrant, we want
4 to preserve any trace invisible evidence that
5 Dr. Kosowski would have had on his person. So after
6 that evidence was collected, I wouldn't have had a
7 problem with allowing him to retain counsel to conduct
8 an interview if that's what he wanted to do. But,
9 again, it's Detective Bolton's case. He was the lead
10 detective.

11 Q. Okay. Dr. Kosowski requested to go to the
12 bathroom at some point, and he was made to wait a
13 significant amount of time.

14 Are you aware of that or were you there when
15 that was going on?

16 A. I was on scene. To my recollection, when I
17 found out that he wanted to use the restroom, we
18 consulted with the State. Obviously, he was detained at
19 that point and detention cannot go beyond the place of
20 the stop. We also don't want to deprive him of any, you
21 know, his comfortability of life, using the restroom,
22 things like that.

23 So after consulting with the State, they had no
24 issues with him being afforded the opportunity to use
25 the restroom. Made contact with them and they made

1 those arrangements. He did not want to go back to the
2 police department to do that. He wanted to go to, like,
3 a local business or something like that. Due to the
4 totality of everything, that wasn't going to be an
5 option. So we informed him that, you know, we'll be
6 happy to accommodate his request. It needs to be the
7 secure manner, going to the Tarpon Springs Police
8 Department, and then we could afford him that
9 opportunity.

10 A point of note, when he went to use the
11 bathroom, I asked him not to wash his hands and he
12 started washing his hands directly afterwards. And I
13 got him to stop doing that. And, again, we're creatures
14 of habit and, you know, we're trying --

15 Q. Right.

16 A. -- we're trying to preserve evidence which
17 is -- you know, I mean, he remained handcuffed and
18 things like that because we're trying to preserve trace
19 evidence at this point that could be located on him.

20 Q. So was there ever an individual at the State
21 Attorney's Office telling to you keep Dr. Kosowski
22 handcuffed in a cruiser without releasing him?

23 A. Not to my -- no, not to my knowledge. I mean,
24 the State Attorney can't tell us when we have probable
25 cause. They can't tell us when we should or shouldn't

1 arrest people. So that wouldn't be -- that wouldn't be
2 something that they would do.

3 Q. Do you know --

4 A. We discussed that he was detained and that we
5 were procuring the warrant, and that we could lawfully
6 detain him. And the decision was made for him to remain
7 handcuffed for preservation of evidence and the fact
8 that he was the suspect of a homicide.

9 I mean, you know, in looking at other cases and
10 looking at officers being attacked and things like that,
11 people do things that, you know, cause us to force --
12 force us to take force sometimes. I wouldn't want there
13 to be an -- I wouldn't want to unhandcuff him for the
14 issue of destruction of evidence.

15 I wouldn't want to unhandcuff him because he
16 might try to attack me and force me into a physical
17 encounter with him, injure me or another detective. Try
18 to get my firearm from me, things like that, force us
19 into a situation where now, you know, we have to react
20 to his actions and take deadly force against him.

21 It's easier to just keep him handcuffed and
22 secured because it preserves evidence, it keeps him
23 safe, it keeps us safe. It's the most prudent thing to
24 do.

25 Q. About how long was Dr. Kosowski handcuffed

1 behind his back in the police cruiser until he was
2 transferred to Tarpon Springs?

3 A. Well, the stop was made right around 3:20 in
4 the afternoon. He was placed in handcuffs by Tarpon
5 Springs, and then he was taken to the police department
6 for the body warrant around 12:52 a.m., so whatever the
7 math is on that.

8 Q. So did -- during those nine or ten hours, did
9 he -- where did he go to the restroom?

10 A. We took him to the Tarpon Springs Police
11 Department, and he was uncuffed to use the bathroom and
12 then re-handcuffed.

13 Q. Okay.

14 A. I mean, we had to uncuff him so he could use
15 the bathroom. I wasn't going to --

16 Q. Right. That's what I'm trying to figure out.
17 But when did that happen?

18 A. When did we take him to the police department
19 to use the bathroom?

20 Q. Yes.

21 A. At approximately 8:14 p.m., Officer Gibson
22 transported him to the police department. We arrived at
23 8:19 p.m. He was brought to the police department. And
24 afterwards, at approximately 8:26, he was transported
25 back to the stop location of 34 West Orange Street.

1 Q. Okay.

2 A. We arrived back there at 8:30. I'm pretty
3 sure -- and I'm -- again, I'm confident that the cruiser
4 he had been placed in, that the in-car camera was
5 rolling. And so all of that's timestamped with in-car
6 camera rolling, that's what I think.

7 Q. Okay. I'm just going to start -- I'm going to
8 read these verbatim.

9 How is Dr. Kosowski being handcuffed in the
10 back of a police cruiser for ten hours without access to
11 a telephone and being denied access to a lawyer
12 different from an arrest?

13 A. I guess you could make the argument that it was
14 a de facto arrest. You'll have to talk to Detective
15 Bolton of when he specifically developed probable cause
16 for Dr. Kosowski.

17 Q. Okay. From your perspective, what's the
18 difference between an arrest and being detained?

19 A. Well, again, I think that there's case law that
20 talks about de facto arrests. I mean, arresting
21 somebody, you know, they have formal charges, they're
22 being transported to the jail and things like that.

23 Again, did Detective Bolton have probable cause
24 for Dr. Kosowski after blood was located in the Corolla
25 well before the body warrant was served? That's

1 something you'll have to talk to him about.

2 Q. Okay. When you first interacted with
3 Dr. Kosowski around 3:50 in the afternoon, did you have
4 probable cause to arrest him?

5 A. I didn't make contact with detective --
6 Dr. Kosowski at 3:50.

7 Q. When did you make contact with him?

8 A. I want to say it was right around the time that
9 we took him to the bathroom, but --

10 Q. Okay.

11 A. -- I'd have to refer to all the body cameras.

12 Q. Got it. I understand now.

13 A. But at that time, we had located blood in the
14 trunk of the Corolla, his kit with a paralytic agent and
15 those sorts of things. So if you're asking me did I
16 feel that we had probable cause at the time? I'm not
17 the case agent, but, yes, I think that we had probable
18 cause for Dr. Kosowski.

19 Q. Okay. Did Dr. Kosowski ask you for a copy of
20 the search warrant?

21 A. For the Corolla?

22 Q. So he could -- yeah, for the Corolla, so that
23 he could read it in the police car.

24 A. I don't recall him asking me for a copy of the
25 search warrant, no. But, again, all of our contact with

1 him is on video.

2 Q. Okay. Do you know if you're required --

3 A. I will say this, you know, so we're clear with
4 everything. He would have remained handcuffed at that
5 time because we were procuring a body warrant. So he
6 obviously is entitled to a copy of the search warrant,
7 he will be given a copy of the search warrant, those
8 sorts of things. But the warrant stayed with the car, I
9 believe. But he would have been -- he would have
10 remained handcuffed because I --

11 Q. Okay.

12 A. -- I'm preserving evidence and the safety
13 concerns that we had mentioned.

14 Q. If he did request of a copy of it, is that
15 something that would have been provided to him?

16 A. I believe we left the warrant with the Corolla
17 and the body warrant was sealed. So he would have
18 gotten a copy of the warrant, yes. Not --

19 Q. To the Corolla?

20 A. -- the affidavit.

21 Q. And would that have been handed to him in the
22 back of the patrol car?

23 A. No, because we were preserving a -- procuring a
24 body warrant.

25 Q. Okay. So when would he have gotten a copy?

1 A. I gave him the copy of the body warrant. I put
2 it in his property at the sheriff's office at the jail.

3 Q. Okay. Did you tell Dr. Kosowski he would be
4 able to go home after the Corolla search and seizure was
5 complete?

6 A. I believe I asked him how he was planning on
7 getting home that evening.

8 Q. Do you remember if you told him that he would
9 be able to go home after the body warrant was complete?

10 A. I would refer to the body camera. I don't
11 recall exactly what I told him.

12 Q. So knowing that he was in the back of the
13 cruiser handcuffed for about ten hours, which seems like
14 a long time, what was the delay there?

15 A. We were waiting on the body warrant.

16 Q. So that -- the whole time, that was we've got
17 to get the body warrant?

18 A. Yeah. So, I mean, and again, you look at
19 the -- if you look at the timestamps for Detective
20 Bolton when he contacted the State to when the warrant
21 got signed and stuff like that, the warrant process
22 takes a long time. That's one of the reasons I had the
23 Corolla warrant written prior to us finding it, because
24 then all I had to do was put the jurisdiction in and get
25 it done. And I think that still took over an hour.

1 Q. Okay.

2 A. So the fact that we were trying to use
3 CloudGavel, because that's what the State and the court
4 system -- like, they had transferred to, we were trying
5 to use that and we couldn't use it. They -- you know,
6 we had to transition into doing a handwritten warrant,
7 which routinely, you know, when we did handwritten
8 warrants, routinely takes six-plus hours. So, I mean,
9 they take -- unfortunately, they take a long time just
10 procedurally.

11 Q. Did you have a complete Corolla search warrant
12 when you arrived at 34 Orange Street in Tarpon Springs?

13 A. I had the PC for the warrant written. When I
14 got on scene, I confirmed the VIN, because I didn't want
15 to do the warrant for the VIN that was listed in DAVID
16 in case there was a scrivener's error or something like
17 that. So I confirmed the VIN to make sure all the
18 information was correct. I had to put the location in.
19 And then upon getting that done, then I had the complete
20 warrant that I sent through CloudGavel.

21 Q. Do you know approximately what time the Corolla
22 search warrant was completely drafted and ready to
23 submit for signature?

24 A. I don't know if I documented that. Let me look
25 real quick.

1 So I got on scene at 3:20, and the warrant was
2 signed and I sent an email to Officer Bogno [phonetic]
3 with Tarpon Springs at 4:49 p.m. So I don't know. I
4 don't know how long it took or when the judge actually
5 signed that. I don't know if CloudGavel has a --

6 Q. Timestamp?

7 A. -- like a timestamp that can be checked as far
8 as that's concerned. But I know that in my experience
9 with CloudGavel, if we've already contacted the judge
10 and they know that a warrant is on the way, once we have
11 it completed and it's been signed by the affiant and the
12 notary, it gets sent to the judge and they are pretty
13 respondent with that.

14 Q. Is that an electronic signature now?

15 A. Yes.

16 Q. Okay.

17 A. Yes.

18 Q. Which judge signed that, the Corolla warrant?

19 A. The Corolla warrant was Judge Bulone.

20 Q. Do you know what time the Corolla search
21 warrant was read on the scene?

22 A. Yeah. It was served by Officer Rose with the
23 Tarpon Springs PD at 4:59.

24 Q. Did Dr. Kosowski ask you to loosen his
25 handcuffs?

1 A. Did he ask me to loosen his handcuffs?

2 Q. Yes.

3 A. I don't -- I don't know. Again, I would look
4 at the -- I would look at the body cameras. I know that
5 I offered him some water and gave him some water when I
6 had made contact with him.

7 Q. Are you aware of any injuries he sustained to
8 his wrists due to the length of time and tightness of
9 the handcuffs?

10 A. Well, I don't know if he sustained any
11 injuries. He was photographed by forensics, so I'm not
12 aware of any injuries that he had.

13 Q. Is it common for people to get injured by
14 handcuffs if they are put on too tight or they're left
15 on too long?

16 A. People have -- like, I mean, if you wear a
17 watch or something and it's on too tight, you might have
18 some markings. I'm not aware of -- I'm not aware of any
19 actual injuries that Dr. Kosowski would have sustained
20 from being handcuffed.

21 Q. When you arrived --

22 A. I haven't personally handcuffed anybody that
23 has caused injury to them in the 17 years I've been a
24 police officer.

25 Q. Okay. When you arrived at the scene, how did

1 you find the Corolla? Was the driver side door closed?

2 Was it open? Was the trunk open or closed?

3 A. I believe when I got on scene the doors were
4 closed.

5 Q. Was the trunk opened?

6 A. I didn't look at -- I don't think so when I got
7 on scene. Again, I would look at the -- the in-car
8 camera from Officer Rose's Tahoe because that would show
9 everything.

10 Q. Okay. Did you personally have permission to
11 open the trunk of the Corolla?

12 A. Did I have permission to open it? I did not
13 open the trunk of the Corolla.

14 Q. Okay. Did you have permission to open the
15 driver's side front door or search the car from
16 Dr. Kosowski?

17 A. Dr. Kosowski did not provide us consent for his
18 vehicle. I didn't open any vehicles of the door -- or
19 any doors of the vehicle or the trunk.

20 Q. Did Detective Bolton open the Corolla driver's
21 side door prior to the search warrant being read at the
22 scene?

23 A. You's have to ask Detective Bolton or refer to
24 the video.

25 Q. Why would Detective Bolton -- I know I need to

1 ask Detective Bolton this, but from your perspective,
2 why would a detective open the trunk of a car prior to
3 having a signed search warrant in hand?

4 A. I don't know if he was checking to make sure
5 that Steven Cozzi wasn't inside the trunk.

6 Q. Okay.

7 A. To me, that would be a reasonable thing. I
8 mean, you know, with Carroll doctrine, right, for
9 vehicles and things like that. And obviously, us
10 procuring a search warrant is due to an abundance of
11 caution, crossing all our t's, dotting all our i's.
12 Dr. Kosowski is a renowned plastic surgeon. This is a
13 serious case, and I think we were being prudent with
14 getting a search warrant.

15 Q. The -- with the driver's side door being open,
16 do you recall that driver's side door being opened prior
17 to the search warrant being signed?

18 A. I want to say every time -- I want to say when
19 I got on scene the vehicle was closed. When I walked up
20 to the vehicle, I want to say the -- I want to say it
21 was closed when I checked the VIN. And I want to say --
22 I think it was closed when Rose was reading it, but
23 again, I would refer to the video. That's going to show
24 you a step-by-step thing of everything that occurred and
25 who did what.

1 Q. Once the driver's side door was opened, did you
2 enter the cabin of the Corolla?

3 A. After the search warrant I was present. I did
4 not wear gloves so I wouldn't touch anything. I believe
5 Officer Rose secured a cell phone that was provided to
6 Detective Wedin and then Supervisor Klein later secured
7 another cell phone that was provided to Detective Wedin.

8 But I didn't go in the car. I didn't touch
9 anything, because, again, the vehicle was outside
10 Largo's jurisdiction. And my understanding is is
11 jurisdiction -- the agency of jurisdiction would be the
12 ones that would have the authority to search, which is
13 why Tarpon Springs and Pinellas County Sheriff's Office
14 is listed on the warrant.

15 Q. Did you see anything suspicious, any blood or
16 anything within the cabin of the car when the door was
17 open?

18 A. Within the cab of the car?

19 Q. Not the trunk, but the main cabin.

20 A. Yeah. I don't recall anything in the cab that
21 I -- that was of noteworthiness while I was on scene.

22 Q. Did you --

23 A. There were other things that were found in the
24 vehicle by forensics, and Detective Allred was the
25 detective that maintained custody of the Corolla that

1 went back to forensics to be processed.

2 Q. Okay. Do you recall if you or any other law
3 enforcement officers took photographs of the trunk or
4 the cabin of the Corolla prior to having the search
5 warrant?

6 A. I believe I used my agency phone to photograph
7 the VIN because of the -- kind of like the reflection.
8 I couldn't really see in the VIN. I didn't want to
9 touch the car, so that way I could zoom in on it and
10 verify -- you know, I could walk back to the car and
11 verify, yes, this is the VIN that's in the search
12 warrant.

13 Q. Okay. Any --

14 A. But I didn't -- I'm not aware of any -- I did
15 not personally take any pictures of the car. Forensics
16 responded and took pictures of car, like, as far as,
17 like, the trunk and the inside of the cab and all that
18 stuff. Forensics was there and they photographed the
19 vehicle before it was taken to the processing bay.

20 Q. Did you see Detective Bolton open the trunk?

21 A. Personally, no.

22 Q. Did you see Detective Bolton open the driver's
23 side door?

24 A. Not firsthand, no.

25 Q. Okay.

1 A. Again, when -- I was at my car dealing with the
2 vehicle warrant, so...

3 Q. So I'm just going to kind of summarize this
4 down to one sentence.

5 So Dr. Kosowski did not give anyone permission
6 to enter the Corolla; correct?

7 A. Correct.

8 Q. And there was some time that the Corolla was
9 stopped. Dr. Kosowski was in the back of the police
10 cruiser, and there was a period of time where everyone
11 is waiting for the search warrant; correct?

12 A. Correct.

13 Q. And according to the video, I believe,
14 Detective Bolton opens the trunk and the driver's side
15 door prior to the search warrant having been read or
16 signed or anything.

17 A. Okay.

18 Q. And then he closes the trunk and the driver's
19 side door.

20 What would be -- why not just keep it open at
21 that point when you know the warrant is coming?

22 A. I don't -- I don't know why he shut it. You'll
23 have to ask him why he did that.

24 Q. Okay.

25 A. Again, I don't think a warrant was necessarily

1 needed because of Carroll doctrine.

2 Q. Okay.

3 A. I would imagine that -- I may have done a sweep
4 of the trunk to see if Steven Cozzi was located inside.
5 And then why close those areas? I mean, we're on a
6 public road, there's people walking around. I don't --
7 I mean, we didn't shut the road down. I mean, there
8 were police officers around, so the Corolla was
9 contained, but the Corolla is much better contained for
10 preserving evidence with doors shut. So that might be a
11 reason why he did it, but you'll have to ask him.

12 Q. Okay. Do you recall how many Largo police
13 officers were on scene prior to Pinellas County
14 Sheriff's Office getting there?

15 A. So are you asking about a deputy with the
16 sheriff's office or are you asking forensics?

17 Q. I'm assuming it's probably forensics is what
18 they're referring to.

19 A. To my recollection, and I'm just -- I'll do my
20 best. I don't -- again, I don't want to misspeak. I
21 mean, it's important to be honest.

22 Q. Sure.

23 A. I know for a fact that I was there, Detective
24 Bolton was there, Detective Allred was there, Detective
25 Lyden was there, Detective Owens was there.

1 At some point Sergeant Caravella was there,
2 Lieutenant Lomonaco was there, Detective Wedin was
3 there. So I can assuredly say at least eight members of
4 the agency were there in total. There may have been
5 more, but those individuals for sure were there, from my
6 independent recollection.

7 Q. Okay. And of those individuals, when the trunk
8 and the driver's side door was open, how many went
9 inside or looked or got close to the car when that
10 happened?

11 A. I recall looking at or in the trunk when
12 forensics was there after the warrant had been read.

13 Q. Okay. I'm talking about prior to the warrant.

14 A. Prior to the warrant I would say refer to the
15 video.

16 Q. Okay.

17 A. I don't believe -- well, I don't know. I know
18 I didn't go in the trunk, and I don't recall -- I don't
19 recall seeing -- I don't recall physically be -- seeing
20 the trunk or the doors open, but, I mean, it's on video.
21 So, I mean, it happened; right?

22 So I don't know. I would refer to the video,
23 but I know I -- I didn't personally go in the trunk. I
24 didn't put any gloves on, again, because we were told we
25 couldn't search. I didn't want to have gloves on then

1 mistakenly, "Oh, look at this," and, you know, pick it
2 up and things like that. So no gloves, no touch.

3 MS. POWERS SELLERS: Okay. This is probably a
4 good stopping point because there's still several
5 more pages of these questions. I'm thinking this is
6 probably an all-day depo, but if you want to break
7 it up in two, I'm going to stop the recording now.

8 Well, actually, now that I'm done, Nathan or
9 Alex, you have any questions?

10 MR. VONDERHEIDE: No questions.

11 MS. SPADARO: No questions.

12 MS. POWERS SELLERS: Would you like to read or
13 waive?

14 THE WITNESS: I'll do whatever the State wants
15 me to do.

16 MS. POWERS SELLERS: Okay. I'm going to stop
17 the recording just in case they want you to read so
18 that you can provide your information to our court
19 reporter; okay?

20 MR. VONDERHEIDE: You don't want to read?
21 Everybody else wants to read it.

22 THE WITNESS: Let's read it. Why not? It's
23 video recorded; right? I mean, it's going to be an
24 accurate representation. Most of my questions --

25 MR. VONDERHEIDE: Then waive it. Do it. He'll

1 waive it.

2 THE WITNESS: Yeah, that's fine.

3 (At 3:59 p.m., no further questions were
4 propounded to this witness.)

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CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF PINELLAS

I, Lori A. Seiden, RPR, FPR-C, Notary Public,
State of Florida, certify that DETECTIVE JERRY
HUNT virtually appeared before me on the 11th day of
September, 2024, and was duly sworn.

WITNESS my hand this 14th day of January, 2025.

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 DETECTIVE JERRY
9 HUNT; that a review of the transcript was not
10 requested; and that the foregoing transcript is a true
11 and complete record of my stenographic notes.

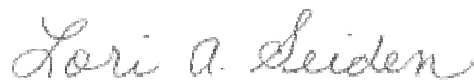
12 I further certify that I am not a relative,
13 employee, attorney or counsel of any of the parties,
14 nor am I a relative or employee of any of the parties'
15 attorneys or counsel connected with the action, nor am
16 I financially interested in the action.

17

18 Dated this 14th day of January, 2025.

19

20



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Lori A. Seiden, RPR, FPR-C

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