

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

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO. 23-02935CF

TOMASZ KOSOWSKI,

Defendant.

\_\_\_\_\_ /

VIRTUAL DEPOSITION OF DETECTIVE JERRY HUNT

DATE: January 7, 2025

TIME: 9:34 a.m.

PLACE: Various Remote Locations  
Via Zoom Video Communications

REPORTER: KIMBERLY L. RENFROE, RPR  
Stenographic Reporter

VIRTUAL  
APPEARANCES:

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1 DEPOSITION IN DISCOVERY

2 DETECTIVE JERRY HUNT

3 Pursuant to notice duly given, the virtual  
4 deposition of DETECTIVE JERRY HUNT, called by the  
5 Defendant in the above-styled cause, was taken by me, a  
6 Notary Public in and for the State of Florida at Large,  
7 at the time and place and in the virtual presence of  
8 counsel enumerated on Page 2 hereof.

9 Thereupon, it was stipulated and agreed by and  
10 between the attorneys for the respective parties, by and  
11 with the consent of the said DETECTIVE JERRY HUNT, that  
12 signature to the said deposition be reserved.

13 THE COURT REPORTER: Raise your right hand,  
14 please.

15 Do you swear or affirm that the testimony  
16 you're about to give in this cause will be the  
17 truth, so help you God?

18 THE WITNESS: I do.

19 DETECTIVE JERRY HUNT, having been first duly  
20 sworn via Zoom Video Communications, upon interrogation  
21 in discovery, testified as follows:

22 DIRECT EXAMINATION

23 BY MR. BRUNVAND:

24 Q. Good morning. My name is Bjorn Brunvand. I  
25 represent Tom Kosowski. We're here for the continuation

1 of your deposition.

2 If you could please --

3 MR. BRUNVAND: Oh, I tell you what, we got to  
4 activate the recording. I'm sorry.

5 (Audio recording started)

6 MR. BRUNVAND: All right. Let me start over  
7 again.

8 Good morning. My name is Bjorn Brunvand. I  
9 represent Tom Kosowski. We're here on State of  
10 Florida versus Tom Kosowski for a continuation of a  
11 deposition of Detective Jerry Hunt.

12 Q. Detective Hunt, if you could please confirm  
13 your -- your name?

14 A. Yeah. My name is Jerry Hunt and I'm a  
15 detective with the Largo Police Department.

16 Q. And I believe that your deposition previously  
17 started on one prior occasion; is that correct?

18 A. It started when? I apologize.

19 Q. There was one previous occasion where we  
20 started the -- your deposition.

21 A. That is correct.

22 Q. And I think it lasted about -- a little shy of  
23 three hours?

24 A. That sounds about right.

25 Q. Okay.

1           A.     You recorded it then so I'm sure the recording  
2 is accurate.

3           Q.     Yes.   That's correct.

4           And Amanda Sellers was the attorney that -- that  
5 was covering on that particular day.

6           A.     Correct.

7           Q.     I believe that her deposition had ended right  
8 around the time when you had arrived at the scene where  
9 the Toyota Corolla had been stopped and you were in the  
10 process of putting together a search warrant; is that  
11 accurate?

12          A.     That sounds about right.  Again, the  
13 recording, I'm sure you reviewed the recording and  
14 you're familiar with what questions are next.  I think  
15 she said she had 27 pages.  We were around page 22 is  
16 what she had told me in the -- in the deposition.

17          Q.     Sure.  Sure.  And I have -- I have those 27  
18 pages and I have -- I have some additional information  
19 as well, so.

20          A.     Okay.

21          Q.     The -- you had indicated, and please correct  
22 me if I'm wrong, but -- but -- but I believe you -- you  
23 had indicated that you were present in Tarpon Springs  
24 where the Corolla had been stopped and seized, and that  
25 you were back and forth between sitting in your car

1 and -- and drafting a search warrant affidavit?

2 A. So the search warrant affidavit, the -- the  
3 most of it had already been drafted for the car.

4 Q. Okay.

5 A. Because I had written that the previous day on  
6 Friday when I was driving to Miami with Detective Wedin.

7 Q. Okay.

8 A. But I was in and out of my car and I was on  
9 scene where the vehicle was.

10 Q. Were -- were you working on -- on a different  
11 search warrant at that same time or was it just  
12 finishing the Toyota Corolla?

13 A. Just finishing the Toyota Corolla. So what I  
14 had done is I had drafted the PC but I needed to add in  
15 where the vehicle was stopped. I wanted to verify the  
16 VIN to make sure there wasn't like a scrivener's error  
17 from what the DMV had versus what was physically on the  
18 car, things like that, so.

19 Q. Okay.

20 A. Get all that up to date, get it -- get it sent  
21 over, get it -- get it signed and CloudGavel was working  
22 for the -- the vehicle warrant.

23 Q. Okay.

24 When I -- when I look at some of the body cam  
25 footage, it appears that you come and go. That --

1 that -- you're -- you'll come up to the car and then you  
2 leave and then you come back --

3 A. Sure.

4 Q. -- on several occasions.

5 A. Correct.

6 Q. You had -- you had indicated previously in the  
7 deposition that in your opinion, as a law enforcement  
8 officer, that you believed that you could search -- you  
9 could have searched the car without a search warrant.

10 A. Well, I think that Carroll doctrine would  
11 allow us to search the vehicle; but under the  
12 circumstances I think the most prudent thing to do is to  
13 get a search warrant.

14 Q. Sure.

15 And -- and what was your understanding at the time  
16 of the Carroll doctrine?

17 A. In reference to what gives us authority?

18 Q. To the particular circumstances -- well, as --  
19 well, in general and as it relates to this particular  
20 case.

21 A. Well, my understanding of Carroll was that  
22 it's an exception to the search warrant requirement in  
23 reference to if you have probable cause that a vehicle  
24 contains fruits of a crime or used in a crime there  
25 would be evidence of the crime therein. Because a



1 vehicle is a movable conveyance that you would be  
2 allowed to search it without a warrant. But because we  
3 had it seized and it was secured and the status of the  
4 case, I felt that a warrant would be the most  
5 appropriate.

6 I had drafted it previously the day before because  
7 I didn't know what jurisdiction it was going to be found  
8 in. So obviously, you know, I only have jurisdiction in  
9 Pinellas County, but if the vehicle was located in  
10 another jurisdiction we would have to apply for and seek  
11 a search warrant in that -- that jurisdiction in order  
12 to be able to search it; and we would have to have that  
13 agency assist us and effect a search warrant.

14 Q. Okay.

15 The -- the -- I mean, I think part of the Carroll  
16 doctrine sort of relies on the exigency of the fact  
17 that -- that a vehicle can be moved and --

18 A. Correct.

19 Q. -- and obviously, that didn't apply in this  
20 case since it was seized, right?

21 A. We -- we had it seized so the most prudent --  
22 the thing that we should do is get a warrant.

23 Q. And -- and the operator of the vehicle,  
24 Dr. Kosowski, had also been seized, right?

25 A. He had been detained. Correct.

1 Q. Right. He was detained. He was -- was  
2 handcuffed and sitting inside a patrol vehicle that he  
3 himself could not exit without the assistance of law  
4 enforcement; is that a fair statement?

5 A. Correct.

6 Q. Okay.

7 Do you recall looking into the trunk of the  
8 Corolla?

9 A. Yeah, I believe the trunk was opened, and  
10 again, Tarpon Springs had their dash camera on so that  
11 could be the most accurate representation of what  
12 occurred on scene. It was on the vehicle the entire  
13 time that it was stopped until I believe it was removed  
14 by Joe's Towing.

15 But yes, I believe I looked inside the passenger  
16 compartment. I looked inside the trunk that had been  
17 opened by officers; and I didn't enter the vehicle or  
18 anything like that.

19 Q. Okay.

20 The -- Tarpon Springs did the initial stop,  
21 correct?

22 A. Correct.

23 Q. And then that was prior to your arrival.

24 A. Correct.

25 Q. And -- and then Tarpon Springs detained

1 Dr. Kosowski prior to your arrival.

2 A. Correct.

3 Q. Okay. Where were you coming from when you  
4 were en route to -- to the stop?

5 A. So, I was at my home and I had been contacted  
6 that the vehicle was hitting on Flock cameras and  
7 investigators believed that it was on his way back to  
8 Tarpon Springs; other investigators had coordinated with  
9 Tarpon to contact them and let them know.

10 Detective Bolton and I were responding to the area  
11 of Tarpon Springs so if it was located that we could  
12 expeditiously be en route on the scene.

13 I didn't -- think I was northbound on 19 when they  
14 had affected the stop, in like the Palm Harbor area.

15 Q. Okay.

16 And -- and any idea how -- how long between the  
17 time the stop took place when you -- and the time that  
18 you arrived at the -- at the scene?

19 A. Well, I know according to my report that I  
20 authored, I was contacted at 1245 in the afternoon by  
21 Sergeant Cabella -- or Caravella about the LPR hit on  
22 the Corolla. At 1520 hours we responded to 34 West  
23 Orange Street because that's where the place the stop  
24 had taken. And I think the stop was just a few moments  
25 before that. So I believe Detective Owens might have

1 contacted me advising that the stop had been conducted  
2 and we went out there.

3 Q. Okay.

4 When -- when you arrived who else was there from  
5 Largo when you arrived at the scene?

6 A. I think I -- I think Detective Bolton,  
7 might -- may have been the first -- we might -- it might  
8 have been Detective -- Detective Owens and then  
9 Detective Bolton. I -- I know that Detective Wagoner,  
10 Detective Allred, Detective Owens, Lieutenant Lomonaco  
11 came out -- I mean most of the division had responded to  
12 the scene.

13 I can't give you the exact times that they arrived  
14 and things like that. I'm sure that they documented  
15 that in their supplements.

16 Q. What -- what do you recall about what you  
17 first did when you first arrived?

18 A. I believe I looked at the car. I make contact  
19 with the other detectives. And then I started working  
20 on updating my search warrant for location of the stop,  
21 verifying VIN and doing those sorts of things.

22 Q. When you say I believe I looked at the car  
23 you're referring to the Toyota Corolla?

24 A. Correct.

25 Q. Okay.

1           And when you looked at the car when you first  
2 arrived, the trunk was closed?

3           A.    I don't recall.  I -- I'd have to check the  
4 video for that.

5           Q.    Okay.

6           The -- the doors were closed?

7           A.    I would check the video.

8           Q.    Okay.

9           A.    Again, everything is on video.  So all of my  
10 actions, my movements, everything was on video.

11          Q.    At some point in the video, and I -- and --  
12 and I will tell you, from the video, the doors were  
13 closed and the trunk was closed when you arrived.

14          A.    Okay.

15          Q.    At some point someone from Largo Police  
16 Department puts on plastic gloves --

17          A.    Okay.

18          Q.    -- latex gloves and reaches into the car and  
19 opens the car, the driver's side door.

20          A.    Okay.

21          Q.    Do you know who that was?

22          A.    If I looked at the video I could tell you.

23          Q.    Okay.

24          I'll take a look here and see if I can --

25               MR. BRUNVAND:  Give me one second.

1 I don't know why it appears to be frozen.

2 I tell you what, I'm going to see if I can  
3 share the screen.

4 THE WITNESS: Okay.

5 MR. BRUNVAND: And I'm going to show you just  
6 a still image that I have.

7 Q. (By Mr. Brunvand) Okay. Are you able to see  
8 the image that's -- that's on the screen right now?

9 A. I can. I'm on the right side in the dark --  
10 in the light blue dress shirt.

11 Q. Right. So -- walking away out of this -- out  
12 of the screen?

13 A. Correct.

14 And then Detective Bolton is the gentleman with the  
15 gloves on, and the -- I guess it's maybe a gray polo  
16 shirt and vest.

17 Wagoner is the --

18 Q. The one who is looking into the trunk?

19 A. Yes.

20 And then Detective Bolton --

21 Q. Detective Bolton?

22 A. Detective Bolton.

23 And then Detective Wagoner is the khaki pants with  
24 the blue polo shirt, kind of looking in my direction.

25 And then Detective Allred is kind of where your

1 cursor is right there, with the khaki slacks, kind of  
2 adjusting his carrier.

3 Q. Okay.

4 MR. BRUNVAND: Let me see if I can get this to  
5 go back to the -- the -- and for some reason it's  
6 frozen. So I would have to -- I'm just going to  
7 stop it and see if I can find the actual videos I  
8 can show you.

9 Q. Well, actually, based on that, I can figure  
10 out who's who as far as opening the door.

11 A. Okay.

12 Q. You don't recall seeing who opened the door  
13 or -- or you didn't -- in fact, I think you said without  
14 looking at the video you don't recall whether or not it  
15 was open or closed when you got there.

16 A. Correct. I mean it's -- I mean we're talking  
17 it was, you know, almost two years ago.

18 Q. I understand.

19 The -- actually, let me try to find the video  
20 because there's a statement made by one of the Largo  
21 detectives questioning opening the trunk without --  
22 prior to getting the search warrant and maybe you can  
23 identify who that is. So give me -- give me one moment.

24 MR. BRUNVAND: I'm not sharing screen at this  
25 point. Right?

1 THE WITNESS: You are not.

2 MR. BRUNVAND: Okay.

3 All right. I do not know why I'm not able to  
4 get the video to play right now.

5 Q. (By Mr. Brunvand) Anyways, the -- shortly  
6 after the detective reaches into the car and opens  
7 the -- the door, a statement is made by another  
8 detective -- I assume they're all detectives, the people  
9 that are there from Largo?

10 A. Correct.

11 Q. Okay.

12 And they basically -- the person says, you know,  
13 should we be searching the car prior to getting a search  
14 warrant; and another detective responds. And I'm  
15 assuming it's the one who reaches into the car, which I  
16 think might be Bolton, but I'm not a hundred percent  
17 sure. Basically says something to the effect of I'm  
18 just doing a cursory view.

19 A. Okay.

20 Q. Do you recall any of that?

21 A. I don't.

22 Q. Okay. All right. And you may not have been  
23 in the immediate presence at that time so -- so --  
24 but -- but presumably if -- if I was able to show you  
25 the video or if you looked at the video, and I believe



1 this is a Tarpon Springs video potentially, the -- you  
2 would be able to identify, even just by the voices  
3 possibly, the people that are speaking.

4 A. Possibly.

5 Q. Possibly. Okay. You're familiar with your  
6 fellow detectives and to significant degree, you know.

7 A. Correct.

8 Q. Okay. All right.

9 But you have no recollection of any of that stuff;  
10 is that correct?

11 A. I do not.

12 Q. Okay.

13 When you were looking into the trunk of the  
14 Corolla, did you see any blood?

15 A. No, I don't -- I don't recall seeing any blood  
16 or anything like that. Again, the vehicle was going to  
17 be searched. I believe, just going off my memory from  
18 almost two years ago, Supervisor Klein I think was doing  
19 some blind swabbing of the trunk after the warrant was  
20 procured for presumptive blood.

21 Q. Sure.

22 A. I don't recall seeing pools of blood or  
23 anything like that and there were a lot of contents in  
24 the back of the trunk.

25 Q. Sure.

1 Did you see anything that -- that just by the naked  
2 eye at that time appeared to you to be blood?

3 A. Again, I just did a brief look in. I didn't  
4 see anything that was overwhelmingly pointing to it  
5 being blood.

6 Q. Did you see anything that was underwhelmingly  
7 pointed towards blood?

8 A. I didn't process it so.

9 Q. Right. So you didn't see anything that, you  
10 know, just by looking at it you say that looks like  
11 blood.

12 A. Correct.

13 Q. Okay.

14 And in fact, if you had, you probably would have  
15 mentioned it, right?

16 A. Sure. Absolutely.

17 Q. Okay.

18 You had indicated that one of the things that you  
19 were verifying was the -- the VIN number to make sure it  
20 was the correct car?

21 A. Correct.

22 Q. Did you photograph the VIN, the -- for the --

23 A. Yes. I used my work cell phone to photograph  
24 the VIN.

25 Q. Okay. All right.

1           And you included that in the affidavit, I assume?  
2           That it was, in fact, the correct VIN?

3           A.     I don't know that I put anything in the  
4           affidavit about that I verified it; just that it was  
5           the -- in reference to the affidavit for the search  
6           warrant. It was a red Toyota four-door vehicle  
7           registered to Tomasz Kosowski with the Florida license  
8           plate EMFK38 with the VIN number. So I didn't -- I  
9           didn't put in that I verified it, it's just that was the  
10          VIN number.

11          Q.     And I guess my question was: Did you have the  
12          VIN number the night before?

13          A.     I have the VIN number from DAVID.

14          Q.     Okay.

15          A.     But I wanted to confirm that that was the  
16          correct number because humans make errors. I don't know  
17          if, you know, somebody fingered something when they were  
18          putting Mr. Kosowski's, you know, data profile together.

19          Q.     Sure. Sure.

20          Now I know you had some contact with Dr. Kosowski  
21          at the scene of the stop.

22          A.     That is correct.

23          Q.     Do you recall the first time that you had  
24          contact with Dr. Kosowski?

25          A.     We used Detective Wedin's body camera to

1 record all of our interactions with Dr. Kosowski. So I  
2 don't recall specifically without reviewing the video.  
3 I mean, that's the -- the video recording of our  
4 contact.

5 Q. Okay. Well, generally, do you recall that  
6 neither you nor anyone else with Largo requested  
7 permission from Dr. Kosowski to search the Corolla?

8 A. Correct. I don't recall ever asking him for  
9 consent.

10 Q. Okay.

11 A. I do know that -- it is my understanding that  
12 when Detective Bolton and Detective Allred made contact  
13 with him to interview him and to speak with him, he had  
14 invoked his -- his rights and they did not ask him any  
15 questions.

16 Q. Okay. And that was later on in the evening,  
17 right?

18 A. No, I think they, while I was working on my  
19 warrant, I think they made contact with him to speak  
20 with him about what was going on and -- and to talk to  
21 him. So my understanding is, is that occurred pretty  
22 early on in the -- when we arrived because I was -- I  
23 was working on the warrant which is why I didn't stand  
24 by with Detective Bolton to make that contact with  
25 Dr. Kosowski.

1 Q. Okay.

2 Were you wearing gloves, like latex gloves, at --  
3 at the scene?

4 A. I don't recall wearing any. I didn't touch  
5 anything though so I didn't -- I wasn't doing any  
6 evidence collection or anything like that or going --  
7 going in or out of the vehicle.

8 Q. Did you -- did you at some point reach into  
9 the Corolla without touching anything?

10 A. Not that I can recall. I -- I was present  
11 when, I believe it was Officer Rose took possession of a  
12 cell phone after reading the warrant; and then I was  
13 present when Supervisor Klein took custody of a  
14 secondary cell phone; both of those were provided to  
15 Detective-Wedin.

16 Q. Okay.

17 But if -- if there is video footage that suggests  
18 that you reached into the -- to the Corolla, you'd be  
19 able to look at that and -- and it would either confirm  
20 or --

21 A. That vehicle was under video monitoring and  
22 recording the entire time that it was on scene.

23 Q. Right. Okay.

24 A. So that would be -- that would be accurate.

25 Q. So -- so it's possible you may have but you --

1 from what you recall you don't think that you had  
2 reached into the --

3 A. I don't have any independent recollection of  
4 doing that; but there is a video recording and the video  
5 recording is going to be the most accurate  
6 representation of what happened.

7 Q. Okay.

8 Do you recall seeing any other members of law  
9 enforcement reach into the vehicle with -- without  
10 wearing latex gloves?

11 A. No, I don't recall that at all.

12 Q. Okay. And again --

13 A. The forensics division responded. They did  
14 some brief processing on scene after the warrant was  
15 affected, but those individuals wear gloves. They  
16 follow protocols. They have policies and procedures  
17 that they follow.

18 Q. Okay.

19 Do you recall or have -- have knowledge of how many  
20 members of Largo Police Department examined the contents  
21 of the open trunk of the Corolla prior to the -- the  
22 Pinellas County Sheriff's Office forensics arriving?

23 A. I don't know. Again I would check the video  
24 and I'm happy to identify anybody that you need  
25 identified.

1 Q. Okay.

2 Did -- did you examine, yourself, any of the  
3 contents of the trunk of the Corolla?

4 A. I believe I looked in the trunk. I didn't  
5 reach in and touch anything or manipulate anything.

6 Q. Okay. So --

7 A. I don't -- I don't recall if that was before  
8 or after the search warrant. Again, I would refer to  
9 the video.

10 Q. Okay.

11 And as far as -- the same question for the interior  
12 of the Corolla. Do you recall who, with Largo Police  
13 Department, examined that prior to the arrival of  
14 Pinellas County Sheriff's Office forensics?

15 A. I do not. Again there is video of the car and  
16 that is the most accurate representation of what anyone  
17 did on that scene.

18 Q. Okay.

19 A. And I'm happy to answer any questions or  
20 identify anybody that you might have.

21 Q. Okay.

22 Were you present when the search warrant for the  
23 car was read at the scene?

24 A. I was present for a portion of it. I did not  
25 stand by with Officer Rose while she read the entire

1 thing. But she captured that on her body camera was my  
2 understanding.

3 Q. Okay.

4 And when she read the search warrant, where did she  
5 read the search warrant?

6 A. She read it out to the car at the -- the hood  
7 of the car.

8 Q. Okay.

9 And would it be fair to say that Dr. Kosowski,  
10 being locked in the patrol car with air conditioning  
11 running and handcuffs in the different location was  
12 probably unlikely to be able to hear the reading of the  
13 warrant?

14 A. I don't know how their video system works, so  
15 if the video plays the audio, I mean that would be able  
16 to be done but I don't -- I don't know that he heard it,  
17 no.

18 Q. Okay.

19 So then let me, I guess, rephrase that then.

20 Would it be fair to say that unless they were  
21 feeding audio into the patrol car --

22 A. Correct.

23 Q. -- where he was held and handcuffed, it is  
24 unlikely that he would have been able to hear the  
25 reading of the search warrant of his Toyota Corolla.



1 A. Correct.

2 Q. Okay.

3 And when the search warrant was read, had Pinellas  
4 County Sheriff's Office forensics arrived?

5 A. I would check the -- the video. I don't have  
6 their timestamps with me when they --

7 Q. Okay.

8 But at some point shortly after -- at some point  
9 shortly after the reading of the search warrant is -- is  
10 it fair to say that Pinellas County Sheriff's Office  
11 forensics processed the car at the scene?

12 A. After the search warrant was written, which --  
13 was read, excuse me, which I have a timestamp of  
14 approximately 4:59 p.m. on the 25th of March, 2023.  
15 After that was read, forensics did its initial  
16 processing at the scene and then they removed the  
17 vehicle to finish processing in their vehicle processing  
18 bay.

19 Q. Do you know whether or not Pinellas County  
20 Sheriff's Office forensics were able to obtain any  
21 presumptive tests at the scene indicating the possible  
22 presence of blood?

23 A. I don't recall whether or not they did that at  
24 the scene or not. Detective Allred was tasked with  
25 being the liaison with Forensics so I would imagine that

1 he would have any of that information with the  
2 presumptive at the scene or whether it was done at the  
3 vehicle processing bay.

4 My understanding is that there was blood found in  
5 the trunk.

6 Q. At what point?

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

8 Q. Okay. So -- so you're saying at some point it  
9 was your understanding that -- that blood was found but  
10 not necessarily at the -- at the site of 34 Orange  
11 Street, correct?

12 A. I don't know where it was found. I don't  
13 know -- I don't recall where the presumptive tests were  
14 conducted that were positive. Again Supervisor Klein  
15 was on scene. I would imagine that the forensics unit  
16 members and technicians that did that would document  
17 that in their reports.

18 Q. Okay.

19 My -- my understanding is that there were negative  
20 processing results at the -- at 34 Orange Street as it  
21 relates to blood.

22 Do you recall having any discussions with Klein or  
23 Briggs about negative results for blood at the scene?

24 A. I don't have any independent recollection of  
25 that, no.

1 Q. Okay.

2 A. I would -- I would refer to their -- their  
3 expertise and their supplements.

4 Q. Okay. Okay.

5 A. But my understanding is, is that items in the  
6 trunk were found to have blood on them when they did a  
7 thorough processing; but again I would talk to  
8 Detective Allred about that because he was present for  
9 all of that.

10 Q. Okay.

11 And it's important, I believe, and I could be  
12 wrong, that we're very careful about, you know, the  
13 time -- the timeline of when things happen so that we  
14 know what was known at the scene of the stop, what was  
15 known later on and what have you. And -- and you don't  
16 recall when you were made aware -- you don't recall  
17 whether or not you were made aware about negative  
18 findings on 34 Orange Street, correct?

19 A. No. I don't have an independent recollection  
20 of that.

21 Q. Okay.

22 And in your reports do you have any -- any notes  
23 suggesting that you were advised or that you learned  
24 that there were negative findings --

25 A. I don't have anything.

1 Q. -- on 34 Orange Street?

2 A. I don't have anything in my report that I've  
3 seen that --

4 Q. Okay.

5 A. -- would say that.

6 Q. Okay.

7 Do you have anything in your report suggesting that  
8 there was positive findings for blood at 34 Orange  
9 Street?

10 A. I --

11 Q. Not later on, but at 34 Orange Street.

12 A. I do not.

13 Q. Okay.

14 And do you recall speaking with Specialist Klein or  
15 Briggs at the scene of 34 Orange Street about the  
16 results of their -- or their conclusions of what they  
17 had found or not found?

18 A. I don't -- I don't remember having a  
19 conversation with them. So again, I would refer to  
20 their reports.

21 Q. Okay.

22 A. And Detective Bolton as well as he's the  
23 primary detective for -- for this case.

24 Q. Okay.

25 So Detective Bolton is -- is the primary detective.

1 What was your -- what was your role?

2 A. I assisted him with his interviews. I would  
3 say that I became the secondary detective during the  
4 course of the investigation.

5 Q. Okay.

6 Does that generally mean that you're pretty much  
7 going to share amongst the two of you anything that  
8 might be of significance as it relates to the  
9 investigation?

10 A. That's likely.

11 Q. Okay.

12 A. So we -- we were both -- up to getting to  
13 Orange Street we were -- we had worked most everything  
14 together. I was present for most all of his interviews.  
15 There was some interviews that he had done the first day  
16 that I wasn't present with; Detective Compton was  
17 present for.

18 Q. Sure.

19 But -- but presumably, if there was information  
20 obtained by Detective Bolton during the interviews that  
21 you were not present for that -- that were -- that was  
22 of significance, he would most likely tell you about it.

23 A. Yeah. I mean he would probably tell me about  
24 it.

25 Q. Okay.

1           And would it be fair to say that, you know -- well,  
2 when you -- when -- last time you were deposed and you  
3 were talking about the fact that you could -- could have  
4 searched it without a search warrant, you know, you  
5 had -- I believe you had indicated, you know, maybe  
6 Cozzi would be in the trunk. Right?

7           A.     That's possible.

8           Q.     Okay. Obviously if you had opened the trunk  
9 and Cozzi was in the trunk, you know, you would have  
10 noted that and that would be significant.

11          A.     Correct.

12          Q.     Likewise, if -- if you had, you know, opened  
13 the trunk and, you know, in plain sight saw large  
14 amounts of blood, that would be significant.

15          A.     Correct.

16          Q.     In fact, if you would see any blood in the  
17 trunk it would be significant and it would be noted.

18          A.     Correct.

19          Q.     Okay.

20                 The -- the search warrant for the Corolla, was that  
21 a warrant that authorized you both to search it and to  
22 seize it and then take it into evidence?

23          A.     My understanding is that the sheriff's office  
24 was listed on here, as well as Tarpon Springs because  
25 we -- we were outside of our jurisdiction.

1 Q. Uh-huh.

2 A. Therefore, the Sheriff's Office forensics  
3 division conducted their processing and whatnot, and  
4 they seized the items and we later got the items out of  
5 their property and evidence division.

6 Q. So when -- so when the -- when the Toyota  
7 Corolla was initially taken from 34 Orange Street, who  
8 made the decision to remove it from there and take it to  
9 the impound?

10 A. Forensics made that decision.

11 Q. So the sheriff's department forensics?

12 A. To -- yeah, to preserve evidence and things  
13 like that. They did -- we don't want to be removing  
14 things from the vehicle sitting on the side of the road,  
15 things like that; we want to be in a controlled  
16 environment to preserve the integrity of the contents  
17 therein.

18 Q. Okay. And -- and was it basically the -- was  
19 that a decision that they made independently or did  
20 Largo have any involvement in that aspect of it as far  
21 as preserving it and impounding the vehicle?

22 A. I think that that's standard practice for the  
23 Sheriff's Office is to process their vehicles in a  
24 controlled environment. In fact, they have secured  
25 evidence storage, secured evidence bays that they --

1 they search vehicles and process vehicles in.

2 Q. Okay. And I guess my question was did -- were  
3 you consulted at all about whether or not the Toyota  
4 Corolla should be moved from the location where it was  
5 searched, to the secondary location where there was a  
6 continuous search, or was it just done without  
7 consulting with you?

8 A. I -- I don't have any independent  
9 recollection, but I don't know.

10 Q. Okay.

11 A. That's always been my practice. That's --  
12 that's what we've always done with the sheriff's office  
13 when -- they take vehicles and they search them when we  
14 get warrants and things like that.

15 Q. Okay.

16 Were you involved in the drafting of the body --  
17 body warrant, the body search warrant?

18 A. No, I was not. Detective Moore was tasked  
19 with that and took care of that.

20 Q. Okay.

21 Do you have any knowledge as to when that was  
22 completed and ready for submission?

23 A. I know that CloudGavel was having issues  
24 because it did not have the appropriate format for a  
25 body warrant and so they had attempted to contact



1 CloudGavel. They didn't have luck with that and so they  
2 had to handwrite the warrant and take it to the judge's  
3 house. I would imagine that Detective Moore would have  
4 documented his timeline with what he had done.

5 The only thing that I have is that when he had met  
6 me and provided me with the true copy of the warrant I  
7 did not keep a detailed timeline of the issues that he  
8 was having when he was working with the attorneys and  
9 trying to procure that warrant.

10 Q. Okay.

11 And -- and Detective Moore, is he with Largo Police  
12 Department?

13 A. That is correct.

14 Q. Okay. And so he -- he's the one that drafted  
15 the body warrant?

16 A. Correct.

17 Q. Okay.

18 Do you have the time that it was actually signed by  
19 the judge?

20 A. I do not have the time that it was signed by  
21 the judge. I would imagine that is -- I would imagine  
22 he would have documented that but I don't have the time  
23 with me now.

24 Q. But your understanding is that -- that he went  
25 to the judge's home to have it signed?

1           A.     That is my understanding and then he responded  
2 to me; and that at approximately 12:50 a.m. on the 26th  
3 of March 2023, he met me at the location where the  
4 traffic stop was, provided me with the true copy of the  
5 body warrant.

6           Q.     Okay. And you say you don't know -- do you  
7 know the judge that signed it?

8           A.     I -- I would have to look at the body warrant.

9           Q.     Do you have it readily available?

10          A.     I do not. I have the warrants that I did.

11          Q.     When -- when Dr. Kosowski was initially  
12 detained, which was at the time of the traffic stop,  
13 right?

14          A.     Correct.

15          Q.     From what you know was there probable cause to  
16 arrest him at that time?

17          A.     I would talk to Detective Bolton about that  
18 because it's his case and he's the one that determined  
19 when he had probable cause in reference to his arrest.

20          Q.     Okay.

21                 Would it be fair to say that -- that regardless of  
22 whether he had probable cause or not he was not arrested  
23 at that time?

24          A.     When we initially made contact with him we  
25 were detaining him.

1 Q. Right.

2 A. We didn't place him under arrest until later  
3 after -- actually until after the body warrant is when  
4 Detective Bolton advised him that he was under arrest.

5 Q. There -- there are -- there's several  
6 recordings in discovery that -- I think they're referred  
7 to as -- I don't know if they're welfare checks or --  
8 let me see here.

9 Yeah, I think they're -- follow-up.

10 And it's basically videos, little, short segments  
11 of videos where -- where various individuals with law  
12 enforcement has contact with Dr. Kosowski during the  
13 period that he is detained.

14 A. Okay.

15 Q. And some of those include you when you have  
16 contact with him.

17 A. Okay.

18 Q. I believe at one point you actually help him  
19 drink some water, if I recall.

20 A. I do.

21 Q. Yeah.

22 And at some point he's taken to Largo -- I mean to  
23 Tarpon Springs Police Department to use the bathroom;  
24 were you there for that?

25 A. I was.

1 Q. Okay.

2 There is a point in time where Dr. Kosowski is  
3 asking to see everyone from law enforcement. And -- and  
4 then there is a gathering where he's asking questions  
5 about how long he's going to be there, you know, is he  
6 going to be able to go home and -- and do you recall  
7 that?

8 A. I do.

9 Q. Okay.

10 At that point he was still detained, right?

11 A. That's correct.

12 Q. Had not yet been arrested?

13 A. He was not -- yeah. He -- Detective Bolton  
14 had not had that conversation with him at that point.

15 Q. Okay. All right.

16 And did you guys -- do you recall what kind of  
17 responses you guys gave him when he was asking if he  
18 could go home and we could maybe meet up again tomorrow  
19 and talk about this?

20 A. I don't have the exact response written down,  
21 but we downplayed the fact that he was being detained  
22 and that, you know, once we got him the body warrant we  
23 would go from there. He asked if he could go home and  
24 meet with us tomorrow and he would provide us the, you  
25 know, whatever we needed for the body warrant, items

1 that we were wanting to collect; but obviously we didn't  
2 do that because of preservation of evidence and, you  
3 know, things being -- possibly being tampered with.

4 But I do recall telling him that he was being  
5 detained. But again I would -- the recording is the  
6 exact conversation that I had with him.

7 Q. Right.

8 Was there any discussions about possibly releasing  
9 Dr. Kosowski after the search of the Corolla had been  
10 concluded?

11 A. With Dr. Kosowski?

12 Q. Yes. Any discussions, any thoughts about  
13 that?

14 A. I would listen to the recording. Again, our  
15 contact with him we downplayed any idea of him going to  
16 jail that evening.

17 Q. Okay. Okay.

18 But -- but apart from -- apart from the -- the  
19 recordings, now looking back at it, was there in your --  
20 in your opinion as a detective, second in command, was  
21 Dr. Kosowski -- was there any chance that Dr. Kosowski  
22 was going to get released that night?

23 A. I think that there was discussion with where  
24 we were going to go but it was my opinion that we had  
25 probable cause for his arrest. So had I been the lead

1 detective I would have made the same decision that  
2 Detective Bolton did and arrested him that evening.

3 Q. Okay.

4 Did you indicate what time the Corolla was towed  
5 from the scene, do you have that information?

6 A. Let me take a look.

7 Q. Okay.

8 A. I notate that Detective Allred took custody of  
9 the Corolla at 6:20 and maintained custody of the  
10 vehicle until processing was completed, but I did not  
11 notate when it was removed from the scene.

12 Q. Okay.

13 A. I just note that Detective Allred would have  
14 done that or again there is a video of when Joe's came,  
15 put it on the truck bed, took it, forensics and  
16 Detective Allred followed it to its final location where  
17 it was processed.

18 Q. But -- but certainly no later than 6:20 and --  
19 and -- and, you know, possibly sometime before that,  
20 maybe around 6:00 or something like that?

21 A. I wouldn't imagine so. No, because he took  
22 custody of it six -- at 6:20 is what I have notated in  
23 my -- my report.

24 Q. Right. Mean -- meaning -- meaning what? Was  
25 that -- that's when it left the scene or -- or --

1           A.     That was when I spoke -- we spoke,  
2 Detective Allred was tasked with taking custody of the  
3 vehicle and going to the scene.

4           So again, my recollection from almost two years ago  
5 is that the vehicle was put on a tow truck; it was on  
6 the tow truck for a little while before it ended up  
7 leaving. But Detective Allred coordinated following the  
8 vehicle to PCSO forensic's vehicle processing bay.

9           If you look in my supplements later on, when I'm  
10 tasked with that I -- I notate when the tow truck  
11 leaves, when it arrives, when it's put into secure  
12 storage; that's the responsibility of that detective  
13 who's doing it, to maintain a chain of custody in  
14 reference to that.

15          Q.     Okay.

16          Now after -- after the vehicle is -- is -- the --  
17 the search of the vehicle has been completed, right? I  
18 mean when it's on the tow truck to search it, the -- at  
19 the street location has been concluded, Dr. Kosowski  
20 remains in custody until -- at the scene until after  
21 midnight, correct?

22          A.     Correct. I mean we -- we leave to go to the  
23 bathroom and things like that. He's detained, I  
24 think --

25          Q.     Sure.

1 A. -- during that time.

2 Q. Yeah, he's detained and he's sitting in the  
3 back of this -- I mean it looks kind of crammed in the  
4 back of that patrol car.

5 A. It's a Tahoe.

6 Q. I think at one -- at one point you actually  
7 readjust the seatbelt or something, maybe in a -- in an  
8 attempt to make it a little bit more comfortable maybe?  
9 I don't know if you recall that or not.

10 A. That sounds accurate.

11 Q. Okay.

12 Why is the seatbelt on when he's not going  
13 anywhere, sitting in the back of that; do you know?

14 A. I don't know why he was -- the seatbelt was  
15 put on him.

16 Q. Okay. All right.

17 A. I -- I didn't put that on him.

18 Q. Okay.

19 Is there a reason why you couldn't have transported  
20 Dr. Kosowski to the Tarpon Springs Police Department,  
21 which is just ten minutes away and then -- or maybe  
22 everyone could be a little bit more comfortable?

23 A. We were coordinating things with the State  
24 with the warrant and things like that. Detective Bolton  
25 was continuing his investigation and -- in reference to



1 whether or not he had probable cause for arrest. And I  
2 think under an abundance of caution we did not remove  
3 him from the place of the stop until we were comfortable  
4 with doing that.

5 Q. So is -- is -- is the thought that you can  
6 detain someone for, what, a reasonable time period?

7 A. My understanding of a Terry stop is that you  
8 can detain somebody and that -- for a reasonable period.  
9 We were affecting a body warrant for a homicide suspect  
10 with a hope of collecting evidence and trace evidence  
11 and things like that, so, we didn't want to remove him  
12 from the stop and then have an issue later on. And he  
13 was detained at that location until we secured that  
14 warrant and then he was removed to the Tarpon Springs  
15 Police Department where that warrant could be safely  
16 affected because it would be the collection of evidence,  
17 photographs, DNA and trace evidence from him in a  
18 secured environment.

19 Q. Would you agree that -- that there's no  
20 black-and-white, you know, guidance as to what a  
21 reasonable time period might be?

22 A. I would say that due to the circumstances and  
23 that we were actively working and trying to get a  
24 warrant, I don't know what a reasonable period would be  
25 for a -- for a homicide suspect under those

1 circumstances. That -- my opinion would be that's for a  
2 judge to decide.

3 Q. Sure. Sure.

4 And presumably it's your opinion that the period of  
5 time that Dr. Kosowski was detained, in light of  
6 everything, was a reasonable time period, right?

7 A. That would be my opinion, correct.

8 Q. Okay.

9 But -- but -- but what I'm asking you is are you  
10 aware of any laws that breaks down sort of a limit on  
11 what is constituted a reasonable time period?

12 A. I don't have any of that case law in front of  
13 me, so.

14 Q. Okay.

15 And has anyone suggested to you that there's like a  
16 hard number or -- or is it your belief that -- that it's  
17 sort of on case-by-case analysis?

18 A. I think that every case is dependent upon its  
19 unique facts and circumstances.

20 Q. Okay. So I -- I -- I take that as you agree  
21 that it's not -- there's not a hard number.

22 A. I would agree with that. I'm not aware of a  
23 hard number.

24 Q. Okay. All right.

25 A. If there is one and you have the case law I

1 would be happy to have that information and look into  
2 it.

3 Q. Of course.

4 In your career -- well, first of all, how many  
5 hours total was Dr. Kosowski detained before he was  
6 arrested?

7 A. Well, the traffic stop was conducted at 3:19  
8 on the 25th in the -- in the afternoon; 1519 hours. And  
9 then I did not receive the body warrant until 0050 hours  
10 on the 26th. So, 11 hours, approximately.

11 Q. Okay.

12 A. I'd have to sit down -- I'd want to sit down  
13 and do the exact math to give you an exact --

14 Q. Right. But somewhere in that range, right?

15 A. (Nods head).

16 Q. Have -- have you, in your career, ever had  
17 another case where you detained someone for roughly  
18 11 hours prior to making an arrest?

19 A. I have not. But this is -- this is a very  
20 unique case and I've never had a case that's been like  
21 this case.

22 Q. I understand. I understand.

23 You -- you indicated that you recall Dr. Kosowski  
24 asking about being released, correct?

25 A. Yes, I believe. I don't recall his exact --

1 Q. Right.

2 A. -- verbiage but he had -- he had a  
3 conversation with us about that.

4 Q. Sure.

5 Do you -- do you recall asking Dr. Kosowski how he  
6 would get -- how he was going to get home if he was  
7 released or after he was released?

8 A. I believe when I was downplaying things that I  
9 did make that statement to him. Correct.

10 Q. Okay.

11 A. Or something to that account. Again --

12 Q. Sure.

13 A. -- there's a recording of it.

14 Q. Is it -- is it your opinion that -- that  
15 the -- the most significant factor contributing to the  
16 delay and -- and -- and then the extended period that  
17 Dr. Kosowski was -- was being detained was the delay in  
18 getting the body warrant?

19 A. It is my opinion that that is the only factor  
20 that caused him to be there for as long as he is. We  
21 had the search warrant pre-written for the Corolla. We  
22 had no issues with CloudGavel. That went off well  
23 without any issues.

24 The factor that remained why we were there for so  
25 long is because we were having issues with the body

1 warrant.

2 Q. Sure.

3 But the Tarpon Springs Police Department was  
4 five minutes away from the stop?

5 A. It was very close to the stop. I don't -- I  
6 don't know -- I mean, at those hours, I -- at  
7 approximately -- like the first -- when we went to the  
8 bathroom, when we took him to the bathroom, we left at  
9 0214 hours and we arrived at the Tarpon Springs Police  
10 Department around -- I'm sorry, 2014 hours and then  
11 2019 hours; so yeah, about five minutes with traffic at  
12 that time.

13 Q. Okay.

14 And what about Dr. Kosowski's home; how far was  
15 that from -- from --

16 A. I'd have to -- I'd have to google that. I'm  
17 not super familiar with Tarpon Springs. But it was  
18 close by. It wasn't -- you know, it wasn't like --

19 Q. Fairly close by.

20 A. Yeah. Tarpon Springs is not a huge community  
21 so he was close by his residence.

22 Q. Is there a particular reason why you -- you  
23 could not have maybe escorted him either to Largo --  
24 Tarpon Springs Police Department or to his home and  
25 stayed stand -- standing by with him while you're

1 awaiting the -- the body warrant?

2 A. Again, I think under an abundance of caution,  
3 under the Terry stop and him being detained at that  
4 point and not making the physical rescue -- you know, he  
5 obviously -- a detention of that length can go to a  
6 de facto arrest, but he -- out of an abundance of  
7 caution I believe that we just wanted to stay at the  
8 place where he was stopped; detention cannot go beyond  
9 the place of the stop. We were trying to get the body  
10 warrant, Detective Bolton was piecing together a very  
11 intricate investigation and determining whether or not  
12 he had probable cause.

13 Q. Okay. I know when you -- I think you said you  
14 escorted him to -- to use the bathroom at Tarpon  
15 Springs?

16 A. I accompanied him to the restroom; that is  
17 correct.

18 Q. Alone, just you, or anyone else from Largo?

19 A. I think -- I mean Detective Bolton and I were  
20 together. We drove there. I took the body camera, went  
21 into the Tarpon Springs PD. I gave -- you know, I gave  
22 him a reasonable amount of privacy but still maintained  
23 visual contact with him. I asked him not to wash his  
24 hands. He did wash his hands. You know, I mean just --

25 Q. He did or he did not?

1           A.    He did wash his hands.  He started to wash  
2  them.

3           Q.    Okay.  So you asked him not to.

4           A.    I asked him not to because we were getting a  
5  body warrant.

6           Q.    Uh-huh.

7           A.    And then he used the restroom.  He went over  
8  to the sink to put his hands under the water and I  
9  stopped him from doing that.

10          Q.    Okay.  So -- so he started to, sort of maybe  
11 out of habit?

12          A.    I don't -- I don't want to speak for  
13 Dr. Kosowski.

14          Q.    Sure.

15          Do -- do you recall whether or not he put soap on  
16 his hands?

17          A.    No, I don't believe he put soap on his hands.

18          Q.    Okay.  Did he put water on his hands?

19          A.    I believe he -- his hands got wet, yes.

20          Q.    Okay.  But you just stopped him pretty much  
21 immediately?

22          A.    Yes.  I said hey, I need you to not wash your  
23 hands.  And then he was compliant.

24          Again, watch the video.  Our entire conversation is  
25 on there.

1 Q. Sure. Sure.

2 And -- and -- and why was that significant, the  
3 idea that -- that he couldn't wash --

4 A. For him --

5 Q. -- his hands?

6 A. Not to wash his hands?

7 Q. Yes.

8 A. It's significant because we're procuring a  
9 body warrant which would include fingernail scrapings  
10 and clippings. So if there were trace evidence of  
11 Mr. Cozzi's DNA or blood underneath his fingernails, I  
12 wouldn't want that to be washed off.

13 Q. Understood.

14 You would agree -- you would agree that  
15 Dr. Kosowski did offer to -- he himself to appear the  
16 next day voluntarily for the body warrant to be  
17 completed, right?

18 A. He did offer that; however we would have no  
19 way of maintaining a chain of custody with that  
20 evidence.

21 Q. Understood.

22 Do you know who -- who was responsible for making  
23 the decision that Dr. Kosowski would remain detained and  
24 not released?

25 A. Who was responsible for making the decision?



1 Q. Yeah, who made that decision. So after the  
2 Corolla was seized and -- and -- and Dr. Kosowski was --  
3 was detained, who made that initial decision?

4 A. I don't know who made that decision. I know  
5 that ultimately Detective Bolton was the case agent. I  
6 was -- I spoke with Detective Moore about getting a body  
7 warrant. So he was -- he was detained so we could get  
8 that warrant.

9 Q. Okay. You were in contact with the State  
10 Attorney's office when you were working on the -- the  
11 warrant?

12 A. Yes. Well, for the -- for the Corolla; I did  
13 that.

14 Q. For the Corolla, right. For the Corolla.

15 A. And the body warrant.

16 Q. And presumably the night before and at the  
17 scene.

18 A. The day before. So I -- I was working on the  
19 warrant. Again, like I said, I traveled to south  
20 Florida with Detective Wedin; he drove. I was in the  
21 passenger seat. I had my laptop with me and I was  
22 writing that narrative on the PC.

23 Q. Okay.

24 MR. BRUNVAND: Guys, I need to take a real  
25 quick break. Let's take -- are we good with taking

1 a five-minute break?

2 MR. VONDERHEIDE: That works.

3 MR. BRUNVAND: Okay. Thanks.

4 (There was a brief recess at 10:47 a.m. and  
5 the proceedings reconvened at 10:52 a.m. with the  
6 same appearances.)

7 MR. BRUNVAND: All right. Are we good?

8 THE WITNESS: We are.

9 MR. BRUNVAND: All right.

10 Q. (By Mr. Brunvand) Do you recall who you were  
11 talking with at the State Attorney's office?

12 A. State Vonderheide.

13 Q. Okay. All right.

14 And did you discuss with -- with him the issue of  
15 continued detention of Dr. Kosowski or the issue of  
16 arrest of Dr. Kosowski?

17 A. Well, ultimately probable cause is up to the  
18 officer. The State doesn't give guidance in reference  
19 to having probable cause when an arrest is made. I  
20 believe I had conversations with ASA Vonderheide about  
21 he was aware that Dr. Kosowski was being detained and he  
22 was notified when the arrest was made.

23 Q. Okay.

24 But as far as asking for his guidance as to  
25 continued detention, was that done?

1 Or was he just alerted as to what was taking place?

2 A. I explained to him what had taken place, where  
3 we were at. He didn't voice any concerns to me that he  
4 had to be -- be released or anything like that.

5 But again, the investigations are ultimately our --  
6 our responsibility. The State has never, as practice,  
7 given us guidance in reference to whether or not we have  
8 probable cause for arrest and things like that. They do  
9 assist us with search warrants and there's -- there's a  
10 procedure that's set up for that, but ultimately we're  
11 the ones that determine whether or not we have probable  
12 cause or not.

13 Q. And I guess -- I guess the follow-up, I guess,  
14 would be because of the delays and -- and the extended  
15 time period, do you recall whether or not you had any  
16 discussions about, you know, how long you could detain  
17 before -- before you had to make a decision about  
18 releasing him or arresting him?

19 A. I don't -- I really don't recall that  
20 discussion.

21 Q. Okay.

22 A. I may have asked if there was case law because  
23 again, I wasn't sure -- I wasn't aware of any case law  
24 that gives, you know, a hard black-and-white line of  
25 this is the amount of time you have and things like

1 that.

2 Q. Okay.

3 And do you recall what his response was?

4 A. I wasn't given any case law because if I was  
5 given case law that hey, there was a dead -- dead  
6 hardline, two, four, six, ten hours, we would have done  
7 what was appropriate whether -- determined whether or  
8 not we had probable cause to make physical arrest or,  
9 you know --

10 Q. Release.

11 A. -- release him if we didn't have probable  
12 cause.

13 Q. Okay.

14 And would you agree that during the time period  
15 that he is being -- that Dr. Kosowski is detained, he  
16 did not have access to a phone?

17 A. That is correct.

18 Q. Did not have access to a lawyer?

19 A. That is correct.

20 Q. Okay. And was handcuffed in the back of the  
21 police cruiser.

22 A. That is correct.

23 With the exception of taking his bathroom break I  
24 mean he was --

25 Q. Sure.

1 A. -- you know.

2 Q. Sure.

3 How long -- how long have you been a detective?

4 A. I transferred up here, I think it was December  
5 of 2020. So I just finished four years.

6 Q. Okay.

7 And how long have you been in law enforcement?

8 A. I started in December of 2007.

9 Q. Okay.

10 A. So what, I'm starting my 18th year.

11 Q. Very good.

12 The -- would you agree that -- that as a -- as a  
13 law enforcement officer you do have the option, when you  
14 have someone detained, to sometimes give them access to  
15 a phone to make a phone call?

16 A. Sure.

17 Q. Okay. I mean, I'm assuming you probably have  
18 done that in your career.

19 A. That's not my practice.

20 Q. Okay.

21 A. Individuals who end up getting arrested,  
22 they -- they can use the phone call at -- to make a  
23 phone call from the jail and things like that.

24 Q. Sure.

25 A. There have been situations. Recently I had a

1 case where a defendant wanted to speak with an attorney  
2 but he said that he wanted to speak with me and asked  
3 that if we could have the attorney come down, that he  
4 would be willing to have a conversation with me and  
5 things like that. I gave him the opportunity to call --

6 Q. Sure.

7 A. -- the attorney.

8 But again, that was my case; I was the lead  
9 detective and those circumstances were different in  
10 reference to that case versus this case.

11 Q. Right. Right.

12 The -- but the bottom line is it -- you have the  
13 discretion should you choose to use it.

14 A. Correct.

15 Q. Okay.

16 And -- and probably most of the time when it is  
17 used, it's -- it's where there might be a mutual benefit  
18 by allowing it, to law enforcement and to the person  
19 that's being detained.

20 A. I -- yeah. That would be -- be accurate.

21 Q. Okay.

22 Were you -- do you recall if you were present  
23 when -- when -- and I believe you were -- when there was  
24 this little meeting, I guess, at the request of  
25 Dr. Kosowski after several hours of being detained and

1 the Toyota Corolla having been removed from the scene?

2 A. My recollection is I was present for some  
3 conversations with Dr. Kosowski with Detective Bolton.  
4 He had asked to speak to everybody on scene.

5 Q. Right.

6 A. And from my recollection, we did not affect  
7 that for him. We didn't -- we didn't have every member  
8 of the scene come over to talk to --

9 Q. Sure.

10 A. -- Dr. Kosowski.

11 Q. Sure.

12 But you do -- but you do have -- there is a moment  
13 where there's multiple individuals; maybe -- maybe not  
14 everyone but -- but at least two or three?

15 A. I believe -- I think -- I think on every  
16 occasion that I was with Dr. Kosowski, it was me and  
17 Detective Bolton.

18 Q. Okay.

19 A. I -- I'd have to look at the video again; like  
20 I'm happy to look at that and the video's the most  
21 accurate representation.

22 But I do recall Dr. Kosowski requesting to speak to  
23 everybody on scene and I did not make that happen for  
24 him. So there were occasions where we spoke with him  
25 and there were a couple of people there.

1 Q. Right.

2 A. Like the Tarpon Springs officer wasn't -- had  
3 to unlock the door for us and Detective Bolton and I  
4 were there but we did not placate him with having a  
5 meeting with everybody that was on scene.

6 Q. Understood. Understood.

7 But -- but during one of those meetings where there  
8 was some questions back and forth and I -- and I'm not  
9 sure if it was you or Bolton that started to get some  
10 biographical information from him --

11 A. Detective Bolton, I believe, started getting  
12 some biographical information and then he said that he  
13 didn't want to provide any of that.

14 Q. Right. Right.

15 And -- and didn't want to talk anymore, right?

16 A. Correct.

17 Q. So basically at that point he invoked; but  
18 your understanding is he had -- he had invoked earlier,  
19 that's why --

20 A. My understanding is that he had invoked upon  
21 initial contact with Detective Bolton.

22 Q. Okay.

23 A. During a conversation that we're having with  
24 him Detective Bolton wanted to get some biographical  
25 information; and during the course of recording that



1 biographical information, Dr. Kosowski explained he  
2 didn't want to answer those questions and then --

3 Q. Sure.

4 A. -- you know, so we -- we stopped, you know.

5 Q. And at least on one occasion, even in your  
6 presence, if I remember correctly, Dr. Kosowski asked if  
7 he could speak with a lawyer.

8 A. My understanding is he invoked his right to  
9 counsel.

10 Q. Right.

11 A. And again, I would -- I would refer to all the  
12 recordings.

13 Q. Understand. Understood.

14 When -- when he's invoking his right to counsel,  
15 did you guys have any discussions amongst yourself, you  
16 and Detective Bolton or with any other supervisors about  
17 whether or not you were going to give him access to  
18 counsel while he's sitting there for hours on end?

19 A. No, I don't recall having a conversation about  
20 that.

21 Q. Was it your belief that keeping Dr. Kosowski  
22 detained for the duration that he was, that -- that that  
23 was violating his civil rights?

24 A. That is not my opinion, no.

25 Q. Okay.

1           Particularly as it relates to not having access to  
2 a lawyer?

3           A.    No, that is not my opinion.

4           Q.    And would you -- would you -- what about as to  
5 not giving him access to a telephone; do you believe  
6 that that violated his civil rights?

7           A.    No.

8           Q.    Not giving him an access to the bathroom with  
9 the exception of the one time?

10          A.    I gave him access to the bathroom.  As soon as  
11 I was made aware that he wanted to use the restroom, we  
12 made that -- those arrangements for him.  So no, I do  
13 not believe that his civil rights were violated.

14          Q.    Okay.

15          You've indicated that -- that it wasn't your  
16 decision as to when Dr. Kosowski would be arrested, but  
17 that you felt like there was probable cause to arrest  
18 him.

19          At what point did you feel like you had probable  
20 cause to arrest Dr. Kosowski?

21          A.    I think that -- and again, I don't have the  
22 exact times because I don't have that in my report, but  
23 in looking at the totality of everything, prior to us  
24 taking him back and affecting the body warrant I believe  
25 we have probable cause.  In reference to the evidence

1 that was found at the -- in the bathroom of the doctor's  
2 office, in the truck that was processed on the garage  
3 floor of Dr. Kosowski's residence, the vehicle, the  
4 items that were located inside the vehicle, the  
5 paralytic agent, all of those things, I think that  
6 that -- all of those things in totality gave us probable  
7 cause for arrest.

8 Q. Okay.

9 A. But again, that wasn't my decision in  
10 reference to this case; that was Detective Bolton's.

11 Q. Understood.

12 Do you recall Dr. Kosowski asking for a copy of the  
13 search warrant for the Corolla?

14 A. I don't recall that; but again I would refer  
15 to the video if he did ask for one.

16 Q. Okay.

17 A. I know one is -- one is with the -- with the  
18 Corolla and one was also filed with the clerk's office.

19 Q. Obviously, Dr. Kosowski didn't have access to  
20 the Corolla after he was detained, right?

21 A. That is correct.

22 Q. Okay.

23 So -- and but he was not provided a -- excuse me  
24 one second.

25 He was not provided with -- with a copy, right?

1 A. No.

2 Q. Okay.

3 Did you -- during the search at the location where  
4 his -- where the Toyota Corolla was stopped, did you  
5 take custody of Dr. Kosowski's iPhone and a TracFone?

6 A. I know that -- let me -- let me review this  
7 real quick. I want to give you times and things like  
8 that.

9 So after the warrant was read Officer Rose began a  
10 precursory search of the vehicle, located a phone in the  
11 cup holder at 1728 hours and that phone was provided to  
12 Detective Wedin at 1729. And then at 1755 hours the  
13 second phone was located by PCS forensic -- PCSO  
14 forensic Supervisor Klein; and again, that was secured  
15 and provided to Detective Wedin at 1756.

16 So Detective Wedin took possession of those two  
17 phones and maintained custody of them.

18 Q. Were they in your custody at some point? You  
19 handed them over to Detective --

20 A. Yeah, I think I was present. I called  
21 Detective Wedin over and he took custody of them.

22 Q. Okay.

23 A. Again Officer Rose is with Tarpon Springs and  
24 then Supervisor Klein was -- is with the Sheriff's  
25 Office forensics division.

1 Q. Prior to seizing those two phones from  
2 Dr. Kosowski at the Corolla search, did you or members  
3 of the Largo Police Department have access to --

4 THE WITNESS: I apologize give me one second;  
5 you disappeared.

6 MR. BRUNVAND: I disappeared?

7 THE WITNESS: Sorry. Can you hear me still?

8 MR. BRUNVAND: I can hear you, yeah.

9 THE WITNESS: I don't know what happened. The  
10 whole -- I can hear you, I just can't see you  
11 anymore.

12 MR. BRUNVAND: Huh.

13 THE WITNESS: But you can hear me so...

14 MR. BRUNVAND: Yeah, I can hear you. I can  
15 hear you.

16 THE WITNESS: Yeah. Okay. I apologize.

17 If you -- if you could restart your question.  
18 My apologies.

19 MR. BRUNVAND: Sure. Sure.

20 Q. (By Mr. Brunvand) So, prior to seizing  
21 Kosowski's iPhone and TracFone during the Corolla  
22 search, did you or Largo Police Department have access  
23 to or use any data from his phones during the  
24 investigation?

25 Do you understand my question?

1           A.     Yeah.  Like -- we didn't like -- I didn't have  
2 any access to his phones or anything like that.  I know  
3 that subsequent warrants were used.  We utilized the  
4 Flock system to -- for like the tags and things like  
5 that, but we -- we didn't have like live location of him  
6 or any of his content for any of his electronic media  
7 stuff, no.

8           Q.     Okay.

9           I believe around 2112 hours, or 9:12 p.m.,  
10 Dr. Kosowski had asked you once again for an attorney  
11 or -- or for a lawyer and that you responded we do not  
12 contact an attorney for you on scene.

13           Does that -- do you recall saying that?

14           A.     That sounds accurate.  I mean, I -- again, I  
15 recall having somewhat of a conversation like that and I  
16 refer to the video for the exact words I used.

17           Q.     Okay.

18           And -- and what is the reason why individuals such  
19 as Dr. Kosowski, in -- in general, at the scene when  
20 they've been detained, are not given access to a lawyer;  
21 do you know?

22           A.     So my understanding is and how I've always  
23 done it, with the exception of the case I just recently  
24 did, any time that somebody wants an attorney and they  
25 invite their -- invoke their right to counsel, I don't

1 ask them any more questioning. They have a right to a  
2 lawyer before any questioning and during any questioning  
3 and that's just not our practice. I mean, we don't --  
4 we don't call attorneys for suspects and have them come  
5 out.

6 I mean, he was being lawfully detained under Terry.  
7 We were working an active investigation. We were  
8 procuring a search warrant for him, and that's not  
9 something that we do. We don't -- we don't get an  
10 attorney for them. That's -- they have a right to  
11 counsel if they want them to be present before or during  
12 questioning but we weren't questioning him so he was  
13 being held for a warrant.

14 Q. He -- he -- he was -- and I think it was  
15 shortly before the biographical information was -- was,  
16 you know, obtained or started to obtain and, you know,  
17 his place of employment and such, either Bolton or you  
18 did advise him of his rights.

19 A. Bolton advised him of his rights.

20 Q. Okay. Right.

21 And when you advise them of their rights that  
22 includes the right to an attorney.

23 A. Yes. Before or during any questioning.

24 Q. Okay. All right.

25 And -- and I think you've indicated that your

1 policy and what you do is you -- you just stop asking  
2 questions at that point and -- and don't provide a  
3 lawyer.

4 A. Yes. If they invoke their rights we do not  
5 conduct an interview. We continue with what we need to  
6 for our investigation and then they're transported to  
7 county jail which they can make any arrangements they  
8 need to for counsel.

9 Q. Being second in command of this investigation,  
10 have you reached any conclusion as to how Steven Cozzi  
11 died?

12 A. I have not.  
13 You're asking by the means of how he died.

14 Q. Correct.

15 A. Okay.

16 Q. And then I guess as a follow-up to that, do  
17 you have an opinion as to how Dr. Kosowski intentionally  
18 caused the death of Steven Cozzi?

19 A. Well, I believe that I had explained to -- was  
20 it -- was it Amanda at the previous --

21 Q. Uh-huh, right.

22 A. Yeah.

23 That it is my opinion, through evidence that has  
24 been processed and collected, that Steven Cozzi was --  
25 there was an incident that occurred in the bathroom of



1 his law office where his blood was located. He was  
2 abducted from that area, placed in a Toyota Tundra that  
3 Dr. Kosowski had purchased, that he did not register;  
4 was taken to his residence in Tarpon Springs; was  
5 removed from the Tundra and placed in his Toyota  
6 Corolla; and was disposed of someplace in South Florida  
7 where we had later gotten pings and had located a  
8 dumpster and some videos and things like that.

9 I did not review that -- that video. But I -- I do  
10 not know the mechanism that he used. I know that we  
11 found a paralytic agent in Dr. Kosowski's possession  
12 that was, from my understanding, taken without consent  
13 from his medical practice.

14 But I -- I don't want to speculate on -- on  
15 anything. Those are the facts that I know and I believe  
16 that Steven Cozzi was killed and his body was disposed  
17 of in South Florida.

18 Q. Okay.

19 But as far as specifically as to what happened, how  
20 it happened, beyond what you just told us you don't know  
21 anything beyond that.

22 A. I would talk to Detective Bolton about that.

23 Q. Okay.

24 Are you familiar with some red-and-white fibers  
25 being located on ballistic vests that were located in --

1 in, I believe, in the Corolla?

2 A. That sounds familiar.

3 Q. Do you know what the significance of those  
4 red-and-white fibers if any?

5 A. Well, I do believe that, according to video  
6 surveillance, the day that Steven Cozzi was last seen at  
7 his law office he was wearing a red sweater. But I  
8 would talk to Detective Bolton about the significance to  
9 any evidence in reference to his case.

10 Q. There is a -- also I believe a black duffle  
11 bag with brass knuckles, duct tape, et cetera.

12 A. Masks, paralytic agent, all of those things.

13 Q. Right. What's the significance -- evidentiary  
14 significance of those items?

15 A. Well, we have a person that was abducted from  
16 an office so I think that having a paralytic agent in  
17 his possession, masks, duct tape, those all go towards  
18 somebody that was going to abduct somebody.

19 Q. Would -- but would you agree that -- that  
20 specifically there's no indication necessarily that any  
21 of those items were used?

22 A. I don't know what has been done in reference  
23 to the forensics processing of any of those items.

24 Q. Okay.

25 Do you know, when the -- when the body warrant was

1 read by Deputy Spicer of the Pinellas County Sheriff's  
2 Office, and not a Tarpon Springs Police Department  
3 agent, do you know why it was read by Deputy Spicer?

4 A. Deputy Spicer's a Pinellas County deputy, has  
5 jurisdiction in the entire county; PCSO forensics was  
6 collecting the evidence. So just for continuity with  
7 having one agency do the -- the warrant versus two, I  
8 think that was probably the reason that it was done.

9 Q. Okay.

10 A. Obviously, Tarpon Springs had conducted the  
11 traffic stop for Dr. Kosowski's vehicle which is what  
12 predicated them to do the warrant and everything because  
13 they had detained him. But typically when I do warrants  
14 outside of our jurisdiction, many times I use the  
15 sheriff's office just for continuity; especially if  
16 forensics is taking custody of the evidence.

17 Q. Would -- would it be fair to say that the  
18 location where the body warrant was served was also in  
19 Tarpon Springs Police Department jurisdiction?

20 A. In Pinellas County, yes.

21 Q. Right.

22 A. Ultimately the sheriff's office has  
23 jurisdiction everywhere in Pinellas County.

24 Q. But did -- did you say the time that  
25 Dr. Kosowski was actually arrested? Do you have that,

1 the exact time that he was arrested?

2 A. I don't have that. I would say that all of  
3 that information and that determination was done by  
4 Detective Bolton.

5 Q. Was it -- was it after -- before or after  
6 the -- the body warrant was -- was conducted?

7 A. Detective Bolton explained to Dr. Kosowski  
8 that he was -- what he was being arrested for after the  
9 body warrant was conducted.

10 Q. Okay.

11 And do you know when the body warrant was -- was  
12 completed?

13 A. The collection of evidence was completed at  
14 1:44 a.m. on the 26th.

15 Q. Okay.

16 A. Is what I have documented -- documented in my  
17 report.

18 Q. What additional evidence had been obtained  
19 from the time of the initial stop by Tarpon and --  
20 and -- and his arrest? So during that 11-plus hours  
21 that he was detained --

22 A. My understanding is that presumptive blood was  
23 located in the trunk; the bag that you've just indicated  
24 with the mask, duct tape, paralytic agent, those things.  
25 A large sum of cash, I think it was well over \$200,000

1 was in his possession; firearms was located in the  
2 vehicle.

3 Q. Okay.

4 So any indication that firearms might have been  
5 used in -- in --

6 A. I'm not sure.

7 Q. -- in the location of the bathroom?

8 A. I'm -- I'm -- I'm not aware of any but I would  
9 talk to Detective Bolton on any other evidence that he's  
10 located. I know that there was a -- I think there was a  
11 firearm with a silencer that was seized from his  
12 residence; but again, Detective Bolton has all that  
13 information. I'm just going on information I've  
14 obtained over the past two years.

15 Q. Okay. Are you aware of any evidence that was  
16 suggesting the use of any firearm in that bathroom?

17 A. I'm not aware of anything.

18 Q. Okay.

19 Were you involved in transporting the Toyota  
20 Corolla and Tundra to Joe's Towing in Largo on  
21 March 30th, 2023?

22 A. Yes.

23 Q. And why was it necessary to transport the  
24 vehicles to Joe's Towing?

25 A. So, the Pinellas Sheriff -- Pinellas County

1 Sheriff's Office has their vehicle storage and things  
2 like that. We do not do long-term evidence storage with  
3 the sheriff's office. And we do vehicle storage, it's  
4 contracted through Joe's Towing. So I used to be a  
5 member of traffic safety unit, so all of our vehicles  
6 that are used in our traffic homicides and things like  
7 that are stored in an evidence bay there.

8 So since these two items -- these two vehicles were  
9 seized as evidence we had to have a place to secure  
10 them; so our long-term vehicle evidence storage is at  
11 Joe's Towing.

12 Q. Do you know how the vehicles are maintained at  
13 Joe's Towing?

14 A. So they are under lock and key and the key is  
15 submitted as evidence with our property division  
16 downstairs. And my understanding is that shows -- also  
17 has surveillance system on the -- on the property that  
18 overlooks those evidence bays.

19 Q. Do you know whether or not the batteries are  
20 maintained?

21 A. On what?

22 Q. On the -- on the vehicles.

23 A. Oh -- no. So, one -- like the Tundra was  
24 secured in its own garage because there wasn't space for  
25 it in the -- in like the vehicle compound that's

1 segregated and secured, so they had an extra open garage  
2 that we've used in the past, so that's -- that's in  
3 there alone. But we don't maintain the batteries on  
4 vehicles, no.

5 Q. Okay. So then what about anything done as far  
6 as fuel additives to the gasoline or the tires or  
7 anything like that?

8 A. There is no vehicle maintenance that is  
9 conducted on the vehicles when they are submitted as  
10 evidence.

11 Q. What do you understand as far as the owner of  
12 the vehicle being able to retrieve either one of those  
13 two vehicles?

14 A. At the disposition of this case, after trial  
15 and when it would be allowed to be disposed of as  
16 evidence, the vehicle owner would be able to take  
17 custody of the vehicles.

18 Q. Okay.

19 If there was ever a consideration of returning one  
20 or two vehicles prior to the conclusion of the trial, is  
21 that a decision that your department would make or is  
22 that a decision that the State Attorney's office would  
23 make?

24 A. That, in my opinion, that would be a decision  
25 that would be derived at mutually by both the State

1 Attorney's office and the Largo Police Department.

2 Q. Okay.

3 Have you considered possibly returning either one  
4 of the vehicles to Dr. Kosowski or his representative?

5 A. No. And in fact, when I was a member of the  
6 traffic safety unit, that was not our practice. The  
7 vehicle that is being stored as evidence remains in  
8 custody of evidence until that time which the case has  
9 been disposed of, whether with a -- whatever that  
10 disposition is and after a reasonable time for any  
11 appeals to have taken place.

12 Q. Were you involved with the RPO that was sought  
13 in this against Dr. Kosowski?

14 A. No. I believe Detective Compton authored that  
15 RPO.

16 Q. When the RPO had been -- had been drafted, do  
17 you know whether or not Dr. Kosowski had already  
18 appeared for first appearance or advisory court?

19 A. I do not know the timeline of that, no. I  
20 apologize.

21 Q. Okay.

22 A. But again, Detective Compton is the one that,  
23 from my recollection, did all the RPO stuff.

24 Q. Are you familiar at all with the frequency  
25 that people who are charged with capital first-degree



1 murder actually are allowed to be released on bond?

2 A. I don't have any of those numbers. No, I'm  
3 not aware.

4 Q. Would you agree that it's very rare? Or do  
5 you not know?

6 A. I don't -- I don't know. I don't -- I  
7 don't -- I didn't run the stats for it, so I would  
8 imagine that, you know, if you're saying that it's rare  
9 I would say -- imagine that I would -- I would give  
10 validity to that; but I don't know.

11 Q. Okay.

12 And so as far as the RPO is concerned, you had  
13 no -- no involvement in that whatsoever?

14 A. No.

15 Q. Okay.

16 There's an allegation in the RPO that Dr. Kosowski  
17 has serious mental illness, or having recurrent mental  
18 health issues. You have any involvement in providing  
19 information that would support that allegation?

20 A. I do not.

21 Q. Did you yourself have any concerns about  
22 Dr. Kosowski having any type of mental illness?

23 A. Well, in reference to the crime that he was  
24 arrested for, I don't think that it's normal for a  
25 plastic surgeon to -- or an attorney that he's having a

1 feud with, that -- that would be, to me -- I mean, I  
2 think that circumstances of the case may -- would be one  
3 that he could be suffering from mental health issues.

4 Q. Okay.

5 But as far as what those issues would be, do you  
6 have any -- any idea or any thoughts?

7 A. I had very little contact with Dr. Kosowski  
8 and all of it's video and audio recorded.

9 Q. Okay.

10 And again, I guess as to statements in the RPO  
11 about human blood in the trunk bed, you didn't provide  
12 any of that information; is that accurate?

13 A. Not to my recollection, no. Again,  
14 Detective Allred is the one that was with forensics when  
15 that was being processed so he would have been the law  
16 enforcement officer that had firsthand information in  
17 reference to that.

18 Q. Did you have information that there was human  
19 blood in the trunk bed?

20 A. That was relayed -- in the truck bed?

21 Q. Yes, in the truck.

22 A. I'm sorry. I thought you said in the trunk.  
23 Yes, in the truck bed, I had information in reference to  
24 that.

25 Q. Okay. What about in the trunk bed? Trunk.

1 A. In the trunk of the Corolla --

2 Q. Yes.

3 A. -- I was provided that information by  
4 Detective Allred.

5 In reference to the bed of the Toyota Tundra, I was  
6 present when the residential search warrant was affected  
7 by Tarpon Springs and I was present with two Tarpon  
8 Springs detectives and I observed what appeared to be  
9 blood. That also tested presumptively positive later on  
10 by forensics in the bed of the Tundra the night of the  
11 residential search warrant.

12 Q. Okay. And -- and would you agree though that  
13 a -- that -- that a presumptive test does not  
14 conclusively indicate that blood is present?

15 A. There could be false positives; however, it is  
16 my understanding that the substance that was tested,  
17 tested positive as Steven Cozzi's blood from PCS --  
18 PCSO lab.

19 Q. And do you know the date that you obtained  
20 that information?

21 A. Detective Bolton is the one that got all that  
22 information and sent those lab reports out -- or those  
23 lab requests out.

24 Q. Presumably on a date after the arrest of  
25 Dr. Kosowski?

1 A. Yes.

2 Q. Okay.

3 A. But you asked if they could be --

4 Q. Right.

5 A. -- false positives.

6 Q. Sure.

7 A. It's possible; however this test that tested  
8 positive ended up, in fact, not just being blood but it  
9 ended up being Steven Cozzi's blood.

10 Q. Sure. Sure.

11 But -- but the point being that when it's first --  
12 when you see what you believe might be blood, and -- and  
13 it's tested and it's positive presumptively for blood,  
14 at that point you don't really know that it's blood, you  
15 know that it's tested -- presumptively tested as blood,  
16 but you can't -- you can't say that it's blood at that  
17 point in time.

18 A. What I will say is that it is my understanding  
19 through cases that presumptive tests are sufficient for  
20 probable cause; and the reason that we follow up with  
21 the laboratory is for proof beyond a reasonable doubt.

22 Q. Okay. So I understand you to say it's  
23 sufficient for probable cause; but again, my -- my  
24 question is you can't say that it's actual blood until  
25 it's been actually tested forensically to indicate that

1 it's actual blood; would that be a fair statement?

2 A. I just want to qualify my answer.

3 Q. I understand. I understand.

4 And I just want to further clarify.

5 A. Not a problem.

6 Q. Okay.

7 The RPO also stated that there was a large quantity  
8 of human blood at the 1501 Belcher bathroom. Again, you  
9 didn't provide that information?

10 A. No.

11 Q. Okay.

12 And -- and I think the quantity of blood, to some  
13 degree, has already been discussed.

14 A. Yes.

15 Q. Would -- would it be fair to say your initial  
16 impression at -- at the 1501 Belcher bathroom was that  
17 there was not a lot of blood there; did not appear to be  
18 a lot of blood there?

19 A. I would say that the initial observations  
20 there was what appeared to be blood on the door, on the  
21 urinal, right next to the urinal, on the toilet; but  
22 upon further processing and inspection with the floor,  
23 there appeared to be a larger quantity of blood that was  
24 smeared in a circular area and there was a drain on the  
25 floor. So I don't know that I can give you an exact

1 quantity of blood that was in the bathroom.

2 Q. Okay.

3 Are you familiar with the first responding officers  
4 at the -- at that location making statements that it did  
5 not appear to be a significant amount of blood in the  
6 bathroom?

7 A. I would refer to them and their reports and  
8 anything else that you might have.

9 Q. Okay.

10 So -- so you don't recall that or --

11 A. I don't recall the exact verbiage that the  
12 other officers used.

13 Again, I went in; my first initial impressions were  
14 there was some blood here, there was some blood there;  
15 and then upon closer inspection Detective Bolton was the  
16 one that had noticed the larger area on the floor by the  
17 drain and the circular pattern. There was discoloration  
18 on the wall. He brought that to my attention. I went  
19 back in and took a look at it with him and observed what  
20 he had located.

21 Q. Were you involved at all in -- in seizing  
22 firearms and -- and/or silencers as a result of the RPO?

23 A. No, I was not involved in any of that. In  
24 fact, the only part of Dr. Kosowski's residence that I  
25 had entered was the garage area. And that was after the

1 search warrant was affected.

2 Q. You had mentioned a substance when you talked  
3 about probable cause. You've mentioned a substance that  
4 had been taken from the surgery facility where  
5 Dr. Kosowski was working?

6 A. So, upon probable cause we had the paralytic  
7 agent. We did not know where that had come from. It is  
8 my understanding that it had come back to the batch that  
9 was at one of his employers. I don't have the dates  
10 that that was done. I don't have the people that  
11 corroborated that. That was just something in being  
12 involved in the case that I came to be aware of after  
13 Dr. Kosowski's arrest.

14 Q. Do you know what that agent was?

15 A. Off the top of my head, no. I could -- I  
16 believe it was listed in Detective Bolton's arrest  
17 affidavit.

18 Q. Is there -- is -- is there a thought that that  
19 agent was used to commit the murder?

20 A. You'd have to talk to Detective Bolton about  
21 that.

22 Q. The -- the blood that you just described as  
23 seeing at 1501-B Belcher bathroom initially, can you --  
24 can you quantify that? I mean was it like -- as far as  
25 teaspoon, tablespoon?

1           A.     The area on the ground was -- appeared to be a  
2     good portion of blood.  But again, with there being a  
3     drain in the floor there, I don't -- I don't know how  
4     much blood in totality was lost at that scene.  But it  
5     appeared to be a larger amount, a -- a pool of blood  
6     that was cleaned up.

7           Q.     What -- would it be -- would it be fair to say  
8     that -- okay.  A pool, that it was cleaned up.

9           A.     Uh-huh.

10          Q.     So there's no -- there's not a pool of blood  
11     present in the bathroom.

12          A.     Correct.

13          Q.     Okay.

14          And presumably you've been to crime scenes where  
15     there were -- there's blood everywhere.

16          A.     Correct.

17          Q.     Okay.

18          That's not what we're talking about here.

19          A.     Was this a -- I -- I would say that in looking  
20     at that scene and in looking at the photos after  
21     processing, it appeared that there was an event where a  
22     larger quantity of blood was there and cleaned up.

23          Q.     Okay.  If you --

24          A.     I -- I can't tell you how many liters.  I  
25     can't -- I can't tell you -- tell you that.  I mean



1 we're -- can -- I apologize for that but that's the act  
2 of it being cleaned up and things like that.

3 Q. Understood.

4 So if you were going to try to gather blood from  
5 that scene -- all right? -- collect it as evidence,  
6 would it be fair to say that even collecting a teaspoon  
7 of blood would be a challenge? To actually collect the  
8 blood.

9 A. Blood that had not been cleaned up --

10 Q. Right.

11 A. -- I would say -- I would say that you had the  
12 swipe on the door, by the urinal and on the toilet,  
13 that -- that was a small amount of just pure blood that  
14 had been missed in the cleaning process.

15 Q. And again, so my question is: If you were  
16 going to try to gather the blood that's there, what you  
17 believe is blood that's present, it would be a challenge  
18 to even collect a teaspoon; is that a fair statement?

19 A. Because of it being cleaned up?

20 Q. Because -- well for whatever reason. I  
21 mean --

22 A. Yes.

23 Q. -- in order for you to -- if I ask you to go  
24 in and collect the substance that you believe might be  
25 blood, it would be a challenge for you to collect even a

1     teaspoon of blood.

2           A.     Of blood alone?

3           Q.     Right.

4           A.     Without anything else, with the cleaning  
5 agents and things like that, yes. There was a -- a  
6 smaller amount of blood that had not been cleaned up  
7 that was left behind that was missed by Dr. Kosowski.

8           Q.     Do you -- do you -- do you disagree with  
9 the -- or do you -- do you have issues with the officer  
10 who originally goes to this bathroom and who makes  
11 statements to Mr. Blanchard and others that there  
12 doesn't appear to be a lot of blood in this bathroom?  
13 Do you -- do you have issues with -- with -- with --  
14 with those statements?

15          A.     Well, I think that to the naked eye and  
16 without looking thoroughly after processing the scene, I  
17 can see how that statement would be made.

18          Q.     Okay.

19          A.     But after the scene had been processed by  
20 forensics, after evidentiary collection had been done,  
21 alternate light sources had been used and you could see  
22 where blood had been and cleaned up, then I think that  
23 you have a -- a better view of the scene and you -- you  
24 would have a different opinion.

25          Q.     Sure. And -- and I don't know to what degree

1 you're familiar with the other substances that may cause  
2 false positives as it relates to what's seen on the  
3 walls and on the floor and what have you, but that's a  
4 consideration, right?

5 A. I don't know everything that would provide a  
6 false positive for whatever items forensic uses. I  
7 don't know exactly what chemical agent they're using,  
8 whether it's STR, sand, or luminol or whatever.

9 Q. Right.

10 And you -- would you -- would you -- would you  
11 defer to the testimony and the judgment of -- of the  
12 experts on that?

13 A. I would.

14 Q. Okay.

15 You -- you spoke in -- in the last time you were  
16 deposed about an unknown male with a goatee and a  
17 Jack Hanna-style shirt. Do you recall that?

18 A. Yes.

19 Q. And did you actually identify that person on  
20 the surveillance video?

21 A. Did I identify that person?

22 Q. Yeah. I mean did you -- did you see that  
23 person on the surveillance video?

24 A. Yeah, the -- I couldn't see their face but the  
25 individual that enters -- and I'll get you the

1 timestamps. Give me a second.

2 In reference to the surveillance video, the  
3 individual that enters dressed in jeans, a long-sleeve  
4 white shirt and the backpack at around 8:34 a.m., the  
5 shirt matches that description of what Celeste Bacher  
6 had explained that she had observed; however there was a  
7 box that was being carried by that individual and the  
8 face was obscured on the surveillance video so I do not  
9 know about facial hair and things like that.

10 Q. Okay.

11 A. When they entered the business.

12 Q. How many times does this person appear on the  
13 surveillance video?

14 A. From what I watched and from my recollection,  
15 that person enters and then is never seen again.  
16 Another person matching that body description and  
17 whatnot later exits at around 10:22 a.m. but they're  
18 wearing a different outfit at that time. And that's the  
19 person that is pulling on the wagon.

20 Q. Is it -- is it your belief that that's the  
21 same person?

22 A. It's my belief that that's the same person and  
23 that it's Dr. Kosowski.

24 Q. So -- so the -- the person who is referred to  
25 as the unknown male with the goatee and a Jack

1 Hanna-style shirt, you believe that's --

2 A. I believe that's the first person that is seen  
3 on surveillance entering the property and I also believe  
4 that that is Dr. Kosowski.

5 Q. Now, I thought there was a description of that  
6 male having a goatee.

7 A. Celeste Bacher provided that description to  
8 me. She approached me when I was on scene.

9 Q. Okay.

10 A. But again, the surveillance video -- because  
11 there's no internal surveillance, the surveillance video  
12 outside, when you watch it there's a -- there's a box  
13 that's on his shoulder and you cannot see his face.

14 Q. Okay.

15 A. But again, in reference of the description of  
16 the white Jack Hanna-style safari shirt, and the shirt  
17 that I saw on the surveillance video, it appears to be  
18 similar. It's a similar description.

19 Q. Would it be -- would it be fair to say that  
20 there's no information that Tom Kosowski had a goatee at  
21 the time?

22 A. I -- I'm not aware of whether he had a goatee  
23 at the time or whether he had a fake goatee or whatever.  
24 I -- I didn't have contact with the Dr. Kosowski that  
25 day.

1 Q. Okay.

2 A. The only time I made contact with him he did  
3 not have a goatee.

4 Q. Okay. Did you question any of Dr. Kosowski's  
5 neighbors and ask them if he had a goatee or not?

6 A. I did not.

7 Q. And why not?

8 A. I didn't question any of his neighbors.

9 Q. Okay. That was someone else's job?

10 A. Yeah. Someone else did neighborhood  
11 canvasses.

12 Q. Okay.

13 Did any other Largo Police Department agents  
14 interview Ms. -- Mrs. Bacher after her photo lineup;  
15 after she viewed the photo lineup?

16 A. I did not do a photo lineup with her and I'm  
17 not aware of -- I don't know. I did not interview her  
18 and I did not conduct the lineup with her.

19 Q. When you -- when you first spoke with Jake  
20 Blanchard -- I believe on March 21st, '23?

21 A. Yes.

22 Q. Did he indicate to you that he thought  
23 Kosowski had harmed Steven Cozzi?

24 A. The only person, you know, when we originally  
25 showed up, we don't really know what we have. We're at

1 the infancy of our investigation and one of the things  
2 that we do is we try to find out as much information as  
3 we can about our victims. The only person that was  
4 listed as ever having an incident with Steven Cozzi was  
5 Dr. Kosowski.

6 Q. Okay.

7 A. However, I will say we didn't, you know -- and  
8 maybe in hindsight we should have, but we -- we didn't  
9 go and interview Dr. Kosowski. We -- we followed  
10 evidence on surveillance video in reference to the  
11 Toyota Tundra and that led us to Dr. Kosowski. Again,  
12 we wanted to put all of our assets and resources on what  
13 we knew we had. You know, we had Steven Cozzi in the  
14 bathroom, removed from the bathroom, in the -- the wagon  
15 to the Tundra; so we were following the evidence.

16 Q. Okay.

17 And I just want to make sure that you answered the  
18 question. Did -- did -- did Jake Blanchard say that he  
19 thought Kosowski had harmed Steven Cozzi?

20 A. I don't recall that statement being made; but  
21 again, Detective Bolton interviewed him and I'm pretty  
22 sure he audio recorded that so I would refer to the  
23 audio recording.

24 Q. Okay. I believe you indicated when you were  
25 first deposed that you believe Steven Cozzi's body is in

1 a landfill in Collier County.

2 A. Yes.

3 Q. Okay. Tell me a little bit more about that.

4 What -- what is -- what's your basis for that and --

5 and --

6 A. I didn't --

7 Q. -- and how strong is your belief?

8 A. I didn't respond to south Florida so my  
9 opinion is based on conversations that I've had with the  
10 unit that did respond there.

11 My understanding is after getting a warrant for  
12 Dr. Kosowski's cellular telephone that there were cell  
13 phone hits that led our team to a dumpster in south  
14 Florida; that cadaver dogs hit on that dumpster; that  
15 investigators ended up getting a video surveillance from  
16 the trash truck that picked it up, and interviewing that  
17 individual. He overwhelmingly described the odor of --  
18 of a decaying carcass. In looking at the video it  
19 appeared that there were trash bags that looked like a  
20 body going into that trash truck.

21 But again, I -- I haven't looked at any of those  
22 videos firsthand and that's my belief in reference to  
23 following the evidence and what my team has shared with  
24 me. But I -- again, I haven't looked at all of that  
25 myself because I wasn't present for that portion of the



1 investigation.

2 Q. Are you -- are you comfortable putting a  
3 degree of certainty as to that belief?

4 A. Without looking at everything firsthand by  
5 myself I would refrain from giving a degree of  
6 certainty.

7 Q. Okay.

8 And -- and you do know that extensive searches were  
9 done at the Collier County landfill?

10 A. I do know that.

11 Q. And I don't believe anything was found that  
12 suggested that the body was there or had been there.

13 A. I don't know how -- because of the time delay,  
14 I don't know how probable it would have been to be able  
15 to find Steven Cozzi due to the time delay and the  
16 amount of trash that was packed upon it, and all of  
17 those things. I mean it's a huge landfill.

18 Q. Sure. And I don't know that -- I know  
19 you're -- you're explaining why it wouldn't be there but  
20 my question was, there wasn't anything that was located.

21 A. We did not locate his body, no; that is  
22 correct.

23 Q. Or any parts of his body.

24 A. That is correct.

25 Q. Or any part of any clothing that may be

1 associated with him.

2 A. That is correct.

3 Q. Or anything belonging to him.

4 A. Again, we do not locate any evidence in  
5 reference to this case there. But again, I -- I don't  
6 know how probable it would have been to locate any  
7 evidence given the time delay and the circumstances.

8 Q. But sufficiently probable that a very  
9 significant amount of resources were -- were dedicated  
10 to that -- to that search over a period of days.

11 A. We did allocate a lot of resources. Again, I  
12 wasn't present for any of that.

13 Q. Understand.

14 And you may have already asked -- answered this.  
15 But do you believe that there was a significant  
16 bloodletting event at the 1501 Belcher bathroom --  
17 1501-B Belcher bathroom?

18 A. I do, in looking at the totality of the scene  
19 after forensics processed, and the cleanup that was done  
20 and the drain on the floor.

21 Q. Do you recall having any discussions with  
22 Pinellas County Sheriff's Office forensics about the  
23 luminol results from that bathroom?

24 A. I believe Supervisor Camacho had informed me  
25 and Detective Bolton that there was a presumptive

1 positive test for blood in the bathroom.

2 Q. Anything else?

3 A. In reference to the?

4 Q. The luminol results.

5 A. Not off the top of my head.

6 Q. Anything about, you know, the significance of  
7 the findings, you know, good or bad?

8 A. Is there a specific thing that you're  
9 inquiring about?

10 Q. No. I'm saying, was there any other  
11 discussion about the significance of the findings that  
12 they had reported to you? I mean, you know, here --  
13 here are -- here is the positives, here are the  
14 potential negatives; here is the strength of it.

15 Any of that type of discussion beyond just saying  
16 presumptive positive?

17 A. Yeah, no, I don't recall any specific details.  
18 Other -- other than the -- I believe it was Supervisor  
19 Camacho had explained that it was presumptively positive  
20 for blood.

21 Q. Okay.

22 I believe on --

23 A. I know later on -- I apologize.

24 Q. No, go ahead.

25 A. I know later on we were notified by the

1 lieutenant of the PCSO AFIS division that one of  
2 Dr. Kosowski's prints was found in the utility closet at  
3 the lawyer's office in reference to it, but that didn't  
4 come from forensics. That came after forensics had  
5 processed they had found fingerprints and things like  
6 that; they sent that to AFIS and then they got a  
7 positive match to Dr. Kosowski.

8 Q. Okay.

9 Was it your understanding that Dr. Kosowski had  
10 been to that building for depositions and other matters?

11 A. It's my understanding that he was present for  
12 a deposition. It is my understanding that he also  
13 confronted Steven Cozzi in the same bathroom that this  
14 incident took place during -- or --

15 Q. During that deposition?

16 A. At deposition, yes.

17 Q. Okay.

18 There's a canvass of -- of the neighborhood of 511  
19 Seaview on March 22nd. I think Detectives Wagoner,  
20 Sinni and Wedin?

21 A. Okay.

22 Q. Were you part of that?

23 A. I was not.

24 Q. Do you know anything about that particular  
25 neighborhood canvass? Anything significant or anything

1 that you know about what they did and what they were  
2 able to uncover?

3 A. No. I know that detectives had been tasked  
4 with following surveillance video, following the Tundra.  
5 We had located it on a PSTA surveillance as well and  
6 they continued kind of leapfrogging down the road trying  
7 to follow that Tundra where it went. Detective Gay had  
8 located the Tundra, got a tag from it on a Flock hit  
9 from a Tarpon Springs plate reader. And I believe they  
10 were doing a neighborhood canvass to try to find any  
11 personal surveillance that homeowners had to take that  
12 vehicle to -- into the neighborhood and to  
13 Dr. Kosowski's house.

14 The most important thing of significance  
15 Detective Cor -- excuse me. Detective Compton had  
16 viewed the video surveillance next-door to Dr. Kosowski  
17 and had located the Tundra as well as the Corolla. The  
18 Tundra going back to the residence and then never being  
19 seen again, and then the Corolla leaving and then going  
20 back to the residence.

21 But as far as canvassing the rest of the  
22 neighborhood, I'm not -- I'm not aware of any specifics.  
23 The only videos I had viewed was in reference to the --  
24 the neighbor right next-door to Dr. Kosowski to the  
25 south.

1 Q. The -- when did you become aware of the fact  
2 that Dr. Kosowski was not at home on March 22nd,  
3 March 23rd?

4 A. So, that would have been the day that  
5 Detective Bolton and I responded to his residence. So,  
6 we -- that would have been the 23rd.

7 Q. Okay.

8 A. So we went to the 511 Seaview Drive around  
9 like 11:25. It was our intent to have a knock and talk  
10 with Dr. Kosowski. And we arrived on scene; there  
11 were -- garage door was shut, there was no cars in the  
12 driveway. We went and knocked on the front door; there  
13 was no answer. There was a door on the -- the main  
14 floor; we went and knocked on that door and there was no  
15 answer so we believed that he wasn't home.

16 Q. Okay.

17 A. Or I mean, he wasn't answering the door.

18 So I don't know -- I know that there was some plate  
19 readers that came back later on. I don't know when I  
20 was made aware of that in reference to the vehicle being  
21 in south Florida.

22 Q. So I believe when you did this knock and talk  
23 I guess, that you had your body camera, Axon Capture  
24 camera activated.

25 A. So I was wearing a dress shirt. I took

1 Detective Bolton's work cell and he logged into the  
2 Capture app that's on the cell phone.

3 Q. Right.

4 A. I put it in my pocket so I could covertly  
5 record our contact.

6 Q. Okay.

7 A. Without having, you know, what appeared to be  
8 a camera strapped to my chest.

9 Q. Okay.

10 And when there's no answer, do you -- do you walk  
11 around the side of the house and the perimeters of 511  
12 Seaview?

13 A. So we walked downstairs. We walked in the  
14 driveway. We didn't go back on his property. There was  
15 a marsh area to the north that Detective Wedin had  
16 looked up and seen that it was -- I think it's like  
17 Swiftmud or something; it's not his property. And so we  
18 went on that property just to kind of see what we could  
19 see in the back.

20 On the north side of the house there's a chain link  
21 fence. There's like sparse bushes. Originally I had  
22 seen some tracks in the -- on the north side of the  
23 driveway, kind of going through like a dirt, shell area.  
24 And then I could see from that property to the north,  
25 kind of looking through the chain link fence there was

1 some tracks and I kind of thought that it might be like  
2 a pool worker or like -- with like the pool equipment;  
3 they typically have the little thing on the back with  
4 the wheels, so I didn't think that that was really  
5 anything of note.

6 We did go to the neighbor to the south where  
7 Detective Compton had reviewed their surveillance. She  
8 was very cooperative. She allowed us to go in her  
9 backyard and we just kind of went in the backyard to  
10 kind of surveil what we could see from her property  
11 without going on his property.

12 Q. So -- so the Axon Capture app did you -- that  
13 was on Bolton's phone that you put in your pocket so you  
14 could record interactions between Dr. Kosowski and  
15 yourself, or whoever might answer the door -- right?

16 A. Right. And then when there was no answer I --  
17 I turned the recording off.

18 Q. Why did you turn it off before you walked the  
19 perimeters and -- I mean, you could have just kept it  
20 on, right?

21 A. I guess I didn't see a reason to have it on.  
22 I had it -- I was capturing it with the intention of  
23 having a conversation with Dr. Kosowski.

24 Q. Okay.

25 A. So -- I use the same cell phone to take



1 photographs so Detective Bolton has those photographs  
2 and they were uploaded in Evidence.com.

3 Q. Would -- do you know whether or not the --  
4 the -- the particular cell phone, this is Doc -- I mean  
5 Detective Bolton's cell phone, right?

6 A. Uh-huh, yes.

7 Q. Do you know whether or not the GPS coordinate  
8 feature for photographs was disabled on that phone?

9 A. I did not disable anything. I -- I could  
10 barely get my -- my zoom thing working. I'm not super  
11 tech savvy with computers.

12 Q. Okay.

13 A. I don't know what it records. I don't know if  
14 Evidence.com or Axon captures that information when  
15 we -- when we put it up. I -- I don't have any idea  
16 about that.

17 Q. The photo --

18 A. I do know when you look at the photos you can  
19 see the shrubbery and I kind of zoom in and look at  
20 that. There -- there's a chain link specifically on the  
21 north side because your former attorney had asked some  
22 questions as well. There's no question on the south  
23 side. That -- there's a -- there's a -- there's a fence  
24 there. There's grass that's in her yard and shell  
25 that's in his. We were very cautious of not going on

1 his property. And to the best of my knowledge I stayed  
2 out of any property that belonged to him. I was in, you  
3 know, that -- that property to the north.

4 But you can see from the -- from the photographs  
5 that I took, kind of my viewpoint and where I was.

6 Q. Okay.

7 Would you agree that, you know, had you kept the --  
8 the Axon app activated it would show us exactly where  
9 you went on the -- both sides of the perimeter of the  
10 property?

11 A. In hindsight, absolutely. Like, that wasn't  
12 done in any malicious intent or anything like that.  
13 Everyone's been very forthcoming with me about, you  
14 know, when we were on scene Detective Wedin found --  
15 looked up the property appraiser, this is where it was,  
16 and looking at the topography, I guess would be the  
17 correct word, we -- we felt that we were not on his  
18 property whatsoever.

19 Q. Okay.

20 I believe when -- when you were deposed by  
21 Ms. Sellers and you were talking about the use of the  
22 SWAT team to gain entry to 511 Seaview, that SWAT became  
23 necessary because you were serving a homicide warrant;  
24 is that correct?

25 A. That wasn't a decision that I made but yeah,

1 any time that we're serving what we would deem a high  
2 risk warrant we -- we use the SWAT team. And in fact,  
3 you know, after the -- the incident that happened with  
4 the FBI a few years ago, even when we're serving child  
5 pornography warrants and things like that, we use our  
6 SWAT team now just out of an abundance of caution.

7 Q. Okay.

8 Had it been determined at that time that -- that --  
9 that you were investigating a homicide?

10 A. I don't know when that determination would've  
11 been made but yeah, I mean we're -- it was our belief,  
12 in looking at the evidence on scene, that Steven Cozzi  
13 was not just missing but he had been murdered.

14 Q. Okay. So -- so I know -- I know when you guys  
15 have contact with Kosowski, you know, at the scene with  
16 the Corolla, you guys are still referring to it as a  
17 missing person investigation; but should I assume from  
18 that that really you had decided prior to the search  
19 of -- of the home at 511 Seaview that you believed that  
20 this was a homicide investigation?

21 A. Yeah, I would say that that's accurate. I  
22 mean every time I go to a suicide to investigate it I  
23 always investigate it as if it's a homicide.

24 Q. Okay.

25 A. I mean, you know, if we -- if we start at a

1 homicide for many of these cases, we don't end up having  
2 to come back later on or miss things. You know, just  
3 like a suicide, I don't want to -- it was titled a  
4 missing person, he was listed as missing person, but we  
5 were concerned that he had been murdered; if that makes  
6 sense.

7 Q. Okay.

8 A. I don't know -- I don't know that we had  
9 probable cause at that point for Dr. Kosowski upon  
10 affecting the search warrant but it was a concern of  
11 ours that he had been murdered.

12 Q. What is -- what is your definition of -- of  
13 homicide?

14 A. The killing of one person by another person  
15 with -- with the intent to effect their death.

16 Q. Okay.

17 A. I mean that's a summation of what the Florida  
18 state statute is for. I mean my -- my opinion of what a  
19 homicide is what the Florida statute says it is.

20 Q. Okay.

21 I believe you indicated in your first deposition  
22 that the -- if -- if the 511 Seaview garage had been  
23 opened by law enforcement prior to the search warrant  
24 being read, that that wouldn't matter. Is that -- do  
25 you recall that?

1           A.    I believe what happened in reference to that  
2 is the SWAT team con -- conducted the securing of the  
3 residence, the clearing of the residence. I think that  
4 the garage door was opened by that SWAT team --

5           Q.    Okay.

6           A.    -- prior to detectives reading the warrant.  
7 But I mean, we had the warrant. We were reading the  
8 warrant to the house. I don't -- I don't know if it  
9 got -- I don't recall if it got reclosed or whatever.

10          I know Tarpon Springs had their body cameras on and  
11 I would -- I would watch those body cameras.

12          Q.    Okay.

13          A.    To see what's -- what's been -- what happened.

14          Q.    What's the purpose of reading the warrant to  
15 the house?

16          A.    So, I don't see a reason to read a warrant to  
17 an inanimate object; however there has been attorneys  
18 that have told me from case law that it needs to be  
19 done. There has been attorneys that told me it does not  
20 need to be done. This is a situation where I'd rather  
21 be safe than sorry, so, you know, we -- it's our  
22 practice currently to read -- to read the warrants.

23          Q.    Okay.

24          Is it -- is it your belief that it may not be  
25 required?

1           A.    I don't have case law to support or refute it  
2   so I've been -- I've been given conflicting answers from  
3   different attorneys.  But again, I think that -- I like  
4   to -- I like to practice things in an abundance of  
5   caution, so I'd rather do something that may not be  
6   necessary but we're allowed to do, than to not do  
7   something that is necessary and not do it appropriately.

8           Q.    Did you enter the -- the residence or the --  
9   or the garage of the residence when it was being  
10   searched?

11          A.    The only place that I entered in  
12   Dr. Kosowski's house was the garage; and I did enter it  
13   with Detectives -- I believe it was Melton and I can  
14   give you the other name -- Sergeant Crawford, who  
15   conducted the search.  We -- I was present for it.  I --  
16   you know, they're the ones that opened the vehicle, did  
17   those things.

18          I was present for those things and observed what  
19   they observed.  I -- I believe I directed one of them;  
20   there was a -- a freezer in the -- in the back.  There  
21   was another cart.  There was -- there was a cart similar  
22   to the one that was used in this incident that we found  
23   in there.

24          Again I would refer to their body cameras.  They  
25   had their body cameras on during the time that I was in

1 the home, and that completely depicts everything that I  
2 did while in the residence -- or in the garage of the  
3 residence.

4 Q. Did -- did you take any photos during the --  
5 during the time that you were in the garage?

6 A. I don't -- I don't recall taking any photos.  
7 I don't know if we had the work cell -- if I had  
8 Bolton's work cell phone or not. I don't recall that.  
9 Forensics was coming in to do it. I don't know that I  
10 would have done that.

11 But again I would look at the -- I would look at  
12 the video because if --

13 Q. You're -- so you may have taken photos but  
14 you're not sure.

15 A. Yeah, I'm not aware of taking any.

16 Q. If you took photos would they have been  
17 preserved in evidence?

18 A. Yes.

19 Q. Okay.

20 And do you know if anyone else took photos of -- of  
21 the people that you were with?

22 A. The only people that I was with were Bolton  
23 myself, Crawford, and Melton.

24 Q. Right.

25 A. Yeah, so I -- I don't recall them doing it.

1 Again, I would look at the -- the video.

2 Q. Okay. So you rely on the video. It's  
3 possible that it may have happened but you -- you don't  
4 recall.

5 A. I don't have any independent recollection of  
6 that, no.

7 Q. Okay.

8 What about did you yourself participate in the  
9 search of the truck?

10 A. In the search of the truck?

11 Q. Right.

12 A. I was --

13 Q. In the garage.

14 A. I was present when they were looking in the  
15 truck. I -- I observed the red substance in the bed of  
16 the truck that later was presumptive as blood and then  
17 later tested positive as Steven Cozzi's blood; but I  
18 didn't -- I didn't search anything. I didn't take  
19 anything. I didn't do anything like that.

20 We did a kind of precursory in the garage to see,  
21 you know, what needed to be processed and then forensics  
22 came in and -- and conducted their investigation. And  
23 then I left the scene to go home prior to forensics  
24 ending their investigation.

25 Q. Okay. So -- so when you left home they were



1 still -- Pinellas County Sheriff's Office forensics were  
2 still processing?

3 A. Correct.

4 Q. When you left to go home, what if any results  
5 did you have from the forensic processing?

6 A. I believe I found out the next -- I think I  
7 found out that evening that -- from Supervisor D'Jimas  
8 that the -- there was presumptive blood in the truck.

9 And then I later learned, in speaking with  
10 Supervisor Stropes, about the -- the substance on the  
11 garage floor.

12 Q. When you say that -- later that evening, are  
13 you talking while you were there at the location?

14 A. While -- while I was there before I left to go  
15 home.

16 Q. Okay.

17 A. I believe I had that information that evening  
18 because I spoke -- I spoke with Supervisor D'Jimas.

19 Q. And would that have also most likely been  
20 captured on video?

21 A. No. I don't -- I don't know. I -- so  
22 forensics doesn't video their processing of scenes.

23 Q. Okay.

24 A. Tarpon Springs use their body cameras when  
25 they were in the precursory search; but then as far as

1 the rest of it, I don't know that anything was on body  
2 camera, no.

3 Q. Okay.

4 What time did you leave that location?

5 A. I -- I apologize. I didn't document the time  
6 that I left. I can -- I might be able to search back  
7 through the call history and get a timestamp of when I  
8 logged out.

9 Q. Was it --

10 A. It was early -- it was early in the morning.

11 Q. Okay. If you're going to roughly guess, you  
12 know what --

13 A. My guess would be like around 1:00 or  
14 2:00 a.m.

15 Q. Okay.

16 A. So, but again, I don't have an exact time for  
17 you. I apologize.

18 Q. Do you recall who the forensic technician was  
19 that provided you with the information prior to you  
20 leaving?

21 A. Supervisor D'Jimas is the one that I had  
22 spoken with.

23 Q. And specifically she told you that there was a  
24 presumptive positive for blood?

25 A. Correct.

1 Q. In the truck -- on the truck bed?

2 A. The truck bed is my recollection.

3 Q. Okay.

4 And she was physically present at the scene as  
5 well?

6 A. She was. And again, I would refer to her  
7 supplements and forensic supplements in reference to  
8 what they processed, what they did, what their findings  
9 were.

10 Q. Okay.

11 Did you speak to anyone else other than her?

12 A. That evening at the scene?

13 Q. Right; of the forensic people.

14 A. Not that I can recall. I typically speak with  
15 the supervisors.

16 Q. Do you know what time the search of the  
17 residence started?

18 A. I do not.

19 Q. Were you at the --

20 A. And that was conducted -- that occurred after  
21 I had left.

22 Q. Okay.

23 A. I was not present for that.

24 Q. So you did not participate in the walk-through  
25 then, right?

1           A.    The final walk-through, no.  In fact, I --  
2  yeah, no, I did not participate in any of that.

3           Q.    Did you participate in an earlier walk-through  
4  or you just strictly were in the garage?

5           A.    I participated in the cursory in the garage  
6  with the two detectives from Tarpon.

7           Q.    Right.

8           A.    I never went inside his home.

9           Q.    Okay.  That's right.

10          A.    I mean his garage is his home.  I never went  
11  inside the living area of 511 Seaview.

12          Q.    Understood.

13                Is there a particular reason why you decided to  
14  leave before the search of the residence?  The -- the  
15  living quarters?

16          A.    I was exhausted.

17          Q.    Okay.  All right.

18          A.    It's 2:00 o'clock in the morning.  I mean,  
19  we'd been working 18-, 19-, 20-hour days.  I had a dog  
20  at home.  I needed to take care of, you know, personal  
21  things.  I -- I needed to go home and go to bed.

22          Q.    And was ASA Spadaro at the scene --

23          A.    She was --

24          Q.    -- when you left?

25          A.    She responded to the scene prior to SWAT

1 getting there.

2 Q. Okay.

3 A. Yeah.

4 Q. And what did you observe about her involvement  
5 of being there during the time that you were there?

6 A. While I was there she was in the street with  
7 other members of law enforcement.

8 Q. Okay.

9 So while you were there Spadaro did not enter the  
10 residence?

11 A. No.

12 Q. Okay.

13 A. I -- like I said, I went in the garage --

14 Q. At least not that you saw.

15 A. I didn't go in the residence. Well, no, I  
16 mean nobody went in the residence except for the two  
17 detectives -- I mean the SWAT team, the two detectives  
18 and then the forensics division, they went and  
19 processed.

20 But we -- when forensics is processing we want to  
21 reduce contamination as much as we can. Unfortunately  
22 due to having the SWAT team affect the warrant, you  
23 know, that -- that was something we have to overcome.  
24 But it's not our practice to walk through scenes when  
25 forensics is processing.

1 Q. Right.

2 A. We want to preserve and collect evidence.

3 Q. Okay.

4 What about going into the garage area where you  
5 were located? Did Spadaro come in there or stayed in  
6 the street with the other one --

7 A. While I was on scene she was in the street.  
8 I'm not aware of anything else.

9 Q. Okay.

10 Were any instructions provided by Spadaro as to how  
11 to conduct the search while you were present?

12 A. We were informed by the State Attorney's  
13 office that we needed to ensure that we did not search  
14 anything in the residence, that Tarpon Springs needed to  
15 conduct the search to have jurisdiction.

16 Q. Okay.

17 A. From the best of my recollection, ASA Spadaro  
18 came out kind of as a liaison with the State, provided  
19 us with that information and then we made that request  
20 to Tarpon Springs PD and they -- they assisted us in  
21 that.

22 Q. As -- as Largo Police Department detectives,  
23 do you guys wear body cameras?

24 A. So, I'd have to check the dates. At the time  
25 of this case coming out, the body camera program was new

1 to our agency.

2 Q. Uh-huh.

3 A. Detectives do not wear body cameras. We can  
4 utilize them for interviews and things like that but  
5 we're not mandated to have them on us and recording at  
6 all times.

7 Q. And when you do use them for interviews or  
8 what have you, do you use it through the app on the  
9 phone or do you actually have one of the cameras  
10 available to you?

11 A. So every member has been issued a camera.

12 Q. Okay.

13 A. I use it when I do, you know, off-duty details  
14 when I'm in uniform.

15 Q. Okay.

16 A. Typically I record my interviews on a digital  
17 recorder covertly.

18 Q. Okay.

19 A. My concern is that if I have a camera strapped  
20 to my chest people might be less likely to talk to me;  
21 but I like to, you know, when I'm interviewing victims  
22 of crimes and suspects of crimes and things like that,  
23 and subjects and defendants, I like to audio record  
24 those contacts.

25 So at that time it was -- it was new to the agency,

1 it wasn't something that we were widely using. And I  
2 think a lot of us have -- now we have the app and we  
3 have some other things. So I tend to use my digital  
4 recorder. I know Detective Bolton uses the app for a  
5 lot of the interviews he does.

6 I'm -- I'm afraid that there's going to be a  
7 malfunction with the phone and then I'm going to lose an  
8 interview.

9 Q. Okay.

10 A. So I typically use my digital audio recorder  
11 with my cases.

12 Q. Okay.

13 So it would be fair to say that you -- you had body  
14 cameras available that you could have worn during the  
15 search of 511 Seaview but chose not to.

16 A. I didn't search 511 Seaview.

17 Q. I understand.

18 During your time in the garage at 511 Seaview, you  
19 could have worn your body cam but you did not.

20 A. I didn't have it with me, I don't think but --

21 Q. Okay.

22 A. -- again, Detective Melton and  
23 Sergeant Crawford had their body cameras, so I felt that  
24 it was --

25 Q. They had their body cameras on?



1           A.    Yeah, their body cameras were recording.  When  
2   Detective Bolton and I were inside and --

3           Q.    Right.

4           A.    -- I had -- the only time that I was inside of  
5   that property body cameras were activated by Tarpon  
6   Springs PD.

7           Q.    Okay.  All right.

8           The tag flipper that -- that I think was discussed  
9   in your first depo, do you know whether or not -- was  
10  there a tag -- what you would describe as a tag flipper  
11  on the Toyota Tundra?

12          A.    Yes.

13          Q.    And do you know whether or not that's  
14  something that -- in that particular one does it  
15  scroll -- does it provide different tags or does it just  
16  bring like a black screen over the license plate?

17          A.    So it's a flipper.  So it's a mechanical  
18  device that you can put two tags on, kind of sandwiched  
19  like this, and then you would activate it and it goes  
20  down and flips.  And so you've got one tag when you're  
21  driving around, you hit the button and then, you know,  
22  activate it however you activate it and then it  
23  mechanically flips it.

24          Q.    And specifically was -- was that -- did it  
25  have two tags on it?

1           A.    I didn't -- I don't -- I don't recall what all  
2 was on -- I would -- I would check the crime scene  
3 photos and things like that.

4           I'm -- I -- I'm pretty sure, just going off memory,  
5 that the New Jersey tag that we got off Flock was not on  
6 the truck.  We --

7           Q.    Okay.

8           A.    -- we could not locate it.

9           Q.    Did you yourself examine this tag flipper?

10          A.    I recall seeing it activated on the truck but  
11 again, I don't remember what was on it, what tags were  
12 on it, things like that.

13          Q.    When you say you recall seeing it activated,  
14 did -- did you examine it yourself or do you just -- or  
15 did someone else activate it?

16          A.    Someone else activated and then I saw it flip.

17          Q.    Okay.  Okay.

18          Do you know who that person was that actually  
19 activated it?

20          A.    I don't remember, no.  I apologize.

21               MR. BRUNVAND:  I know we've been going for a  
22 while.  If anyone needs a break just let me know.

23               THE WITNESS:  I'll use the restroom whenever  
24 you guys want to take a break, but we can continue.

25               MR. BRUNVAND:  How long have we been going?

1 THE WITNESS: It's 12:26 right now, so.

2 MR. BRUNVAND: All right.

3 Should we take a little break, Nathan?

4 MR. VONDERHEIDE: I mean, if you guys want to.

5 Whoever needs a break. I'm good to go.

6 MR. BRUNVAND: Why don't we -- why don't we  
7 take a little break. Let's take -- let's take a  
8 ten-minute break.

9 THE WITNESS: Okay.

10 (There was a brief recess at 12:26 p.m. and  
11 the proceedings reconvened at 12:34 p.m. with the  
12 same appearances.)

13 Q. (By Mr. Brunvand) All righty.

14 Were you -- were you aware -- and this will be on  
15 the day that the search of the Corolla took place.

16 Were you aware that Tom Kosowski was driving from  
17 Miami prior to --

18 A. Yes. So -- so I was contacted earlier that  
19 afternoon that plate hits had come back, that he was  
20 traveling, it appeared to be from Miami toward, you  
21 know, back in this direction. I believe it was  
22 Detective Compton and Detective Gay that had come in  
23 on -- on Saturday morning and had started kind of  
24 querying those -- those tag readers and -- and kind of  
25 picking up where we left off. And I was notified at

1 12:45 by Sergeant Caravella that there had been an LPR  
2 hit registered to Dr. Kosowski and that they believed he  
3 was heading back to the Tampa Bay area from south  
4 Florida. But I don't know what camera that was on. I  
5 wasn't privy to any of that information.

6 Q. Okay.

7 You had indicated earlier that when Dr. Kosowski  
8 requested access to a bathroom that you provided it to  
9 him shortly thereafter, I believe you said.

10 A. Yeah.

11 Q. If there is a two-and-a-half-hour delay  
12 between the time when he first asked for access to the  
13 bathroom and when you provide him with use of a  
14 bathroom, would that be consistent with -- with -- with  
15 your time period that you remember or --

16 A. I don't know if Dr. Kosowski had asked  
17 somebody for a restroom prior to asking me -- asking --  
18 me -- me being aware of it.

19 Q. Okay.

20 A. As soon as I was aware of it, we made efforts  
21 to provide him with that. I didn't want to deprive him  
22 of -- of using a restroom if we could do it, first of  
23 all, lawfully, and then safely, and then appropriately  
24 to preserve the evidence that we were seeking a warrant  
25 for.

1 Q. Did -- do you believe that it took  
2 two-and-a-half hours for you to make that accommodation  
3 or do you believe that he asked someone else and that  
4 person did not convey the information?

5 A. I don't recall my process of getting that done  
6 taking two-and-a-half hours.

7 Q. Okay.

8 A. I don't --

9 Q. Is it your belief that it probably did not or  
10 you -- or you're not sure?

11 A. It's my belief that when I was noti -- it --  
12 it's my recollection that as soon as I was aware that he  
13 needed to use the restroom we provided him with  
14 accommodations to do that.

15 Q. Okay.

16 A. And again I don't -- I can't -- I don't know  
17 if he asked another officer, I don't know if he -- I  
18 don't -- I don't know that.

19 MR. BRUNVAND: Hold on one second.

20 Okay. Never mind.

21 Q. During your interactions with Dr. Kosowski,  
22 you mention making him whole on several occasions.

23 Do you recall what -- can you elaborate on what --  
24 what you meant by that?

25 A. I think, like I said earlier, you know we were

1 trying to downplay our contact and, you know, keep him  
2 cooperative, and I think to -- to -- to allow him to, I  
3 don't know, to be all like, you know, I apologize that  
4 we -- you're being detained; I know this is taking  
5 longer than anticipated. It was taking much longer than  
6 any of us had anticipated. In an ideal world we would  
7 have been able to do the body warrant right in  
8 conjunction with that Corolla warrant and it may have  
9 taken an extra 45 minutes or an hour. I mean in an  
10 ideal world that's how CloudGavel is supposed to work  
11 and unfortunately we didn't have that.

12 I think that it was probably just a word that I  
13 used to try to keep a good rapport with him.

14 Q. Okay. All right. Recognizing the fact that  
15 the Supreme Court allows you to be untruthful from time  
16 to time if -- in interacting with people that you --

17 A. That is -- that is accurate, but, you know,  
18 quite frankly, you know, taking into the totality of the  
19 circumstances -- I mean, even not the circumstances, you  
20 know, I try to conduct myself in doing the right thing.  
21 And so, when he needed to use the bathroom I tried to  
22 get that accommodated for him.

23 I can totally understand why he was, you know,  
24 upset that he had been in the back of the car for so  
25 long, I recognize that; but, you know, unfortunately

1 that was outside our realm of control.

2 Q. Understood.

3 A. So I -- my entire job is talking to people who  
4 have done some of the most deplorable things in society  
5 and, you know, being respectful of them and trying to  
6 find out their story and find a reason why they do what  
7 they do; and I think that's just kind of how I conduct  
8 myself.

9 Q. Who made the decision to handcuff Dr. Kosowski  
10 behind his back?

11 A. Well, he was handcuffed behind his back by  
12 Tarpon Springs Police Department when they took him into  
13 custody.

14 Q. Okay.

15 And when -- when -- when Dr. Kosowski asked you to  
16 loosen your handcuffs, did -- did you assist him with  
17 that or no?

18 A. I don't -- I don't remember. Again, all of  
19 that's in the video recording.

20 Q. It -- was it -- was he handcuffed with his  
21 arms behind his back for -- for more than ten hours, for  
22 the -- I mean for the duration of -- of -- of his  
23 detention?

24 A. Well, it's interesting that you bring that up.  
25 He was handcuffed behind his back until he slipped his

1 cuffs in front of him when I told him we were getting  
2 the body warrant and he started sucking underneath his  
3 fingernails and cleaning his fingernails off on his  
4 teeth. So he put his hand -- hands in front of himself.

5 Q. At some point.

6 A. At some point. Actually at -- right before we  
7 left to go to the police department. So, like around  
8 like 12:29:04. And then he tries to put his hands back  
9 behind his back at 0031 hours approximately, but he's  
10 unsuccessful. I didn't catch it until I reviewed the  
11 in-car video. When we took him out at the Tarpon  
12 Springs Police Department to affect the body warrant I  
13 didn't realize that he had slipped his cuffs and that  
14 they were in front of him. It just didn't click with me  
15 until I watched the video.

16 Q. Okay.

17 Is there a reason why -- why you do it behind his  
18 back instead of in front when he's locked in a car like  
19 that?

20 A. Absolutely, there's a number of reasons.

21 So this is a person who knows what he did. He  
22 knows -- he knows what happened. He knows where Steven  
23 Cozzi is. He knows what he did. And I'm not willing to  
24 risk my life for his comfort. I don't know if he would  
25 try to attack me, if he was handcuffed in the front.



1           We would want to keep him handcuffed in the back  
2 for preservation of evidence, which Dr. Kosowski showed  
3 when he slipped his cuffs and started tampering with  
4 evidence and, you know, cleaning underneath this  
5 fingernails and sucking on them, things like that,  
6 20 minutes before we were going to the police department  
7 to effect a body warrant. So there's a plethora of  
8 reasons why we have somebody handcuffed behind their  
9 back.

10           It is our policy that detained individuals that are  
11 handcuffed are handcuffed behind the back, given absent  
12 a -- a medical issue or something like that. But for  
13 safety and for preservation of evidence I think that  
14 it's most appropriate that he was handcuffed behind his  
15 back.

16           Q.    And then you said you -- you were not aware of  
17 these things until later on when you watched the video.

18           A.    Correct.

19           Q.    Okay.

20           A.    Again I didn't handcuff him, Tarpon Springs  
21 did. I think it's appropriate he was handcuffed behind  
22 his back. And in the moment I didn't realize when he  
23 was brought in that an officer hadn't inadvertently  
24 moved the handcuffs up front but that he had, in fact,  
25 slipped it himself.

1 Q. Okay.

2 Was there any time during his detention, you know,  
3 whether it's at the two-hour mark, the five-hour mark,  
4 the eight-hour mark, whether there was any consideration  
5 given to loosening up the handcuffs or -- or anything  
6 like that?

7 A. Again, it -- he may have asked me; I would  
8 look at the -- the video.

9 So how handcuffs work, with 18 years of being a law  
10 enforcement officer, if you're handcuffed behind your  
11 back and I have them very loose what ends up happening  
12 is you -- your wrist is not a perfect circle but the  
13 handcuff is a circle. And so if it's too loose it ends  
14 up putting pressure on it and things like that; and if  
15 it -- it needs to be tight enough to where we can get a  
16 finger inside of it so they stay in place so the person  
17 doesn't, you know, have issues with the handcuffs. And  
18 then secondly it needs to be tight enough and not too  
19 loose to where they can slip the handcuff.

20 So it's -- if -- it is my practice that when I have  
21 handcuffed people as a patrol officer and detective,  
22 when they ask I typically check; and if it is a  
23 situation where it is appropriately fastened, there's no  
24 reason to adjust them. If there's a situation where  
25 they are too tight and it does not have that finger

1 spacing, then I would adjust it for them.

2 I don't recall whether or not I did that with him,  
3 but his entire contact's on video; I would refer to the  
4 video.

5 Q. Okay.

6 Would you agree that Tom Kosowski was overall  
7 cooperative?

8 A. I would agree with that.

9 THE WITNESS: Can you hear any of the  
10 background that I have over here?

11 MR. BRUNVAND: Can I what?

12 THE WITNESS: Can you hear any of the  
13 background that I'm hearing?

14 MR. BRUNVAND: No.

15 THE WITNESS: No? Okay.

16 MR. BRUNVAND: No.

17 Q. (By Mr. Brunvand) The Corolla's trunk was  
18 closed prior to the Pinellas County Sheriff's processing  
19 unit starting their examination of the vehicle.

20 Do you know why it was closed?

21 A. So, I know that you had said earlier when we  
22 got on scene it was closed; a Largo officer opened it  
23 we're not sure who.

24 Q. Right.

25 A. And then it was closed again.

1 Q. Right.

2 A. And so your question is why was it closed  
3 after it had already been --

4 Q. The second time, right.

5 A. I didn't close it but if I were to speculate I  
6 would imagine for evidence.

7 Q. Okay.

8 A. You know, purposes for preserving evidence for  
9 preservation.

10 Q. Okay. All right.

11 A. Again, I don't know, you know, if it was  
12 opened for just a precursory search to ensure that, you  
13 know, Steven Cozzi wasn't in the back and then, you  
14 know, I -- I would say that it would have been closed  
15 afterwards just to preserve evidence; we're on the side  
16 of a road.

17 Q. Okay. I mean clearly the -- the search of the  
18 Corolla, once you have the search warrant -- is there a  
19 search prior to the forensic doing their or do the  
20 forensics go first and then you guys do the search?

21 A. I don't think anyone entered the vehicle with  
22 the exception of the cell phones. I -- I don't recall  
23 entering it. I think that it was -- they were looking  
24 for any -- anything right then that we could get because  
25 the processing would take hours to conduct. But it

1 would -- it would be my practice to have forensics  
2 process and search the vehicle in coordination.

3 So I think they -- and again, I'm just speculating  
4 on why they did some certain things at the scene. I  
5 think they were -- I think they were just looking for  
6 any overt evidence that we would have during the  
7 detention phase upon making contact with him. And then  
8 they brought it back to the legal processing bay to  
9 conduct their thorough forensic investigation.

10 Q. Okay. Were you directing Specialist Klein  
11 to -- to -- regarding the presumptive blood testing of  
12 the Corolla at the scene? Do you recall that?

13 A. I don't recall that.

14 Q. Okay.

15 A. It's pos -- it's possible.

16 Q. Okay.

17 A. I don't recall having -- I don't recall what  
18 the details of any conversations I had with her.

19 I know that we were talking about we were going to  
20 be moving it to the -- to the evidence bay, they were --  
21 they were taking the cell phones and then again, I think  
22 they were looking for any overt evidence that we -- that  
23 we could see right then and there.

24 Q. The search warrant indicates specifically that  
25 the vehicle may be searched -- maybe towed from the

1 current location in front of 34 West Orange Street,  
2 Tarpon Springs, to Largo Police Department to be  
3 searched and processed.

4 Is that where it was towed to?

5 A. It was towed to the processing bay for the  
6 sheriff's office. They have a secure vehicle processing  
7 center off of 49th Street. That's where it was taken.

8 Q. Is there a reason why -- why the search  
9 warrant would say Largo Police Department instead of the  
10 sheriff processing bay?

11 A. An error. We don't -- we don't have an open  
12 facility to do secured searching for vehicle processing.  
13 We have a vehicle processing room but it's utilized as a  
14 garage.

15 Q. So --

16 A. And forensics would have searched -- would  
17 have taken it to their -- their location.

18 Q. So you -- you -- you drafted the search  
19 warrant affidavit.

20 A. I did.

21 Q. Who -- who drafted the actual search warrant?

22 A. So I put it in the PC narrative. I work in  
23 accordance with the State, specifically ASA Vonderheide,  
24 to get the search warrant put together and through  
25 CloudGavel and -- and so I think that may have just been

1 a -- an error on our part that it was listed as Largo PD  
2 rather than their -- their location.

3 Q. Okay.

4 A. Because the sheriff's office is who takes  
5 custody of all of our evidence. They take custody --  
6 they're the ones processing it. They're the ones that  
7 are using their equipment. They have all the equipment  
8 that they use at their -- at their vehicle base. So  
9 just an error.

10 Q. Have you had any contact during this  
11 investigation or any other investigation with  
12 Supervisor Stropes with the Pinellas County Sheriff's  
13 Office forensics?

14 A. Yes. I spoke with her in reference to some  
15 patterns that they had located in the residence, I  
16 believe. Give me a second.

17 Yeah, I spoke with Supervisor Stropes in reference  
18 to the garage floor being tested with luminol and having  
19 a positive reaction. Through further forensic  
20 processing areas of possible blood were located and  
21 tested positive through presumptive testing.

22 I called her from my desk, I believe, and had a  
23 telephone conversation with her.

24 Q. And when was that?

25 A. I want to say it was on the 24th of March.

1 Prior to right when I got back from Miami. I don't -- I  
2 don't remember the time of day but I do remember having  
3 a telephone conversation with her.

4 Q. And when -- when -- when was Dr. Kosowski  
5 initially detained and then arrested?

6 A. The 25th. This was reference to the garage  
7 floor of the residence for the search warrant --

8 Q. Right.

9 A. -- on this residence.

10 Q. Right.

11 And -- and was the purpose of the call to include  
12 that information in your search warrant application?

13 A. Yes.

14 Q. Is it your understanding that Stropes was  
15 never at 511 Seaview when it was being processed?

16 A. I don't -- I don't know. I know that D'Jimas  
17 was the supervisor on scene; Bolton had gotten  
18 information from forensics and then I had contacted  
19 Stropes who is a supervisor with the forensics division.  
20 I don't know if she took that. I don't -- I don't know  
21 if she processed it or back at the -- the testings or if  
22 she went over what was in the -- the report. I had  
23 gotten the information from her and from  
24 Detective Bolton.

25 Q. Is it -- is it possible that you're mistaken



1 about Stropes being the one that provided that  
2 information?

3 A. I'm pretty confident I had a conversation with  
4 Stropes.

5 Q. Okay.

6 Were you aware of Celeste Bacher's failure to ID  
7 Kosowski as a person of interest; were you involved in  
8 that?

9 A. I was not involved in a photo pack. I don't  
10 think I knew about that until actually I was asked about  
11 it in my first depo.

12 Q. Were you aware that -- that she had been  
13 interviewed?

14 A. I spoke with her briefly the first day of the  
15 investigation when she approached me and then I had no  
16 further contact with her.

17 Q. And she's the one that's describing the goatee  
18 man, right?

19 A. Correct.

20 Q. So her lack of identifying Kosowski, you did  
21 not know that until after you had submitted the search  
22 warrant affidavit?

23 A. Correct.

24 Q. Would you have included that in the search  
25 warrant affidavit if she had -- if you had -- if you

1 were aware of the information? That she did not  
2 identify Kosowski?

3 A. Well, I think that we do -- I mean, I would  
4 have provided all the information for the case to the  
5 ASA that's working with us and we draft the warrant  
6 together. So if it needs to be addressed then I mean,  
7 it's our responsibility to report what we have and what  
8 we know at the time -- right? -- whether it's good bad  
9 or indifferent.

10 Q. Sure.

11 A. So if it needed to be included it would be  
12 included.

13 Q. Okay. I mean obviously, if she had identified  
14 Kosowski that would be significant, right?

15 A. Correct.

16 Q. And so, I mean, it -- would it be fair to say  
17 that the opposite then is also significant?

18 A. Yeah.

19 Q. Okay.

20 A. I -- I -- I would say that -- I didn't  
21 interview her so I don't know if she -- I think there's  
22 a difference between saying I can't identify the person  
23 and then identifying the wrong person. So, I think  
24 those are two entirely different things.

25 Q. What's your -- and what's your understanding,

1 did -- did she identify the --

2 A. I don't know. I wasn't aware of the photo  
3 pack until I believe my depo; but I wasn't aware that  
4 had taken place.

5 Q. Okay. So even to this -- to this date you're  
6 not familiar with all the circumstances surrounding that  
7 attempt to identify him.

8 A. I am not. I don't know what her statements  
9 were; I did not conduct that interview and I don't know  
10 what she said.

11 Q. Okay.

12 Do you know whether or not Specialist Klein and  
13 Briggs were alerted to the fact that detectives with  
14 Largo Police Department had opened the trunk and the  
15 door and -- and reached into both places prior to them  
16 doing the forensic examination?

17 A. I don't -- I don't know if they were aware of  
18 that. I don't know that any detectives reached into the  
19 trunk of the vehicle prior to forensic's examination  
20 prior to the warrant being done. I know that I did not  
21 do those things.

22 Q. Okay.

23 When you were at 511 Seaview in the garage, did you  
24 see any ammunition?

25 A. I'm trying to think.

1 Q. Sure.

2 A. I don't recall.

3 Q. Do you recall seeing any hunting gear?

4 A. I don't recall. Again, there -- there's a  
5 SWAT team with video body cameras and the two detectives  
6 that I were with had their body cameras activated that I  
7 was with the entire time.

8 Q. When did you learn that Dr. Kosowski was a  
9 surgeon?

10 A. When did I learn that he was a surgeon?

11 Q. Right. Was it before or after the search of  
12 511 Seaview?

13 A. I don't know. I think we -- I mean we were  
14 aware of the lawsuit that was going on but I don't -- I  
15 don't know when we determine -- when we learned, you  
16 know, what type of medicine he practiced or that he was  
17 a plastic surgeon or whatever he was. I don't have a  
18 timeline for that. I apologize.

19 Q. Okay.

20 The -- can we go through the reports that you have  
21 authored in this case?

22 A. Yeah.

23 The supplements?

24 Q. Yeah. So what would be the first supplement?

25 A. It is -- the first one starts out on 3/21/2023

1 I was contacted by Sergeant Recla.

2 Q. Okay. All right.

3 A. And that supplement in itself is eight pages  
4 long and that details March 21st and then the early  
5 morning hours of March 22nd.

6 Q. It's eight pages?

7 A. Yes.

8 Q. One, two -- so it looks like the one I have is  
9 eight pages. Let me -- let me -- let me share --

10 A. It's eight pages.

11 Q. No, I'm saying -- I'm sorry. It looks to me  
12 like mine is seven; but let me -- let me share what I  
13 have and let me know if I'm missing something here.

14 A. Okay.

15 (Screen shared.)

16 Q. Can you see that?

17 A. When I contacted Sergeant Recla, yeah.

18 Q. Okay. And so that's one page.

19 A. That's page 174; that's one, yeah.

20 Q. 175 is two.

21 A. Hold up. Hold on one second. Go back. Go  
22 back up.

23 Oh, see this is -- so just keep going up. Stop  
24 right there.

25 So my first page reads paragraph, you know: This

1 is to supplement OPD. Then it says on 3/21/23, and then  
2 it says, taking into account; the next paragraph  
3 Officer Bure; the next paragraph, I then began to note;  
4 next paragraph, as you enter the front main doors; and  
5 then page two starts with: After noting the general  
6 layout of the office building.

7 Q. Okay.

8 A. Which is going there. So I think that it's --  
9 it's just the spacing printed out differently.

10 Q. Okay.

11 A. Because yours -- it looks like yours is  
12 printed as a totality, like the entire report, and mine  
13 was printed just this supplement.

14 Q. Okay.

15 A. So it starts with: On 3/21/2023 and then my  
16 last page says -- the last -- second-to-last paragraph  
17 says, since I observed a PSC bus traveling northbound  
18 and then it says this case is still active NFI.

19 Q. What's --

20 A. So you have the full report.

21 Q. Okay.

22 A. Yeah.

23 Then my second supplement --

24 Q. Hold one second. Let me -- let me make sure  
25 that --

1           Okay what's your second one?

2           A.     The second one -- all my supplements start out  
3 this is to supplement the case number -- but it says on  
4 Wednesday 3/22nd --

5           Q.     Right.

6           A.     -- 2023. This is where we respond to Whitney  
7 Circle. Detective Bolton -- I used his work cell phone  
8 to photograph the residence. I get the Ring  
9 surveillance.

10          That supplement I have as being two pages; the  
11 last -- second-to-last paragraph is: I subsequently  
12 contacted Largo Police dispatch and spoke with  
13 Dispatcher 5801 for the soft inquiry with NCIC/FCIC.

14          Q.     Okay. I have that.

15          A.     Okay.

16          My next supplement is dated Thursday 3/23 of 2023.

17          Q.     Yes.

18          A.     And it is -- in my opinion, it's two pages  
19 because the last page says this case is still active  
20 NFI.

21          Q.     Okay.

22          A.     But the one before that is: The list was  
23 submitted as an attachment to Largo Police records in  
24 reference to Tarpon Springs SWAT team.

25          Q.     The list --

1           A.     So I got -- the end of that -- that  
2 supplement, right -- right before that thing, I list out  
3 the SWAT team members and I say that list was later  
4 submitted as an attachment to Largo Police records; this  
5 case is still active NFI is the ending of that  
6 supplement.

7           Q.     Oh, the ending, okay. Got it. Got it. Yeah.  
8 Yeah.

9           A.     And then the next supplement, I'm confident  
10 that it's just one page. It's Friday 3/24 2023 with  
11 Detective Wedin.

12          Q.     Go to Miami?

13          A.     Yes.

14          Q.     Okay.

15          A.     And then the next one is Saturday 3/25/2023, I  
16 was contacted by Sergeant Caravella. 12:12:45 hours by  
17 Sergeant Caravella.

18          Q.     And then that's two pages or --

19          A.     That's -- so that, on mine on the format, it's  
20 three pages because it ends: This case is still active  
21 NFI on the third page. But the last -- the last  
22 paragraph of substance is: At 0417 I responded to  
23 Pinellas County Jail property division and submitted the  
24 true copy of the warrant.

25          Q.     Same. I have it.



1 A. Okay.

2 And then the next supplement is Thursday, 3/30.  
3 Assisted Detective Moore with the infotainment warrants.

4 Q. Okay.

5 A. And that, for me, is three pages. It ends on  
6 4/20/2023 I responded to the criminal court complex and  
7 met with ASA E. Lipton.

8 Q. Yes.

9 A. Okay. Just so you're aware, too, I did note a  
10 scrivener's error in there, a little bit up there. It  
11 says search warrant number 92 and then it says S --  
12 SW392, that's -- that should be number 93. So the pound  
13 signs above three, that was a scrivener's error. So  
14 it's -- those two warrants were number 92 and 93.

15 Q. So the search warrant for the Tundra?

16 A. Is 92.

17 Q. Is ninety -- 392?

18 A. It is number 92. And the search warrant for  
19 the Corolla is number 93.

20 Q. Oh, I got it. So it should -- instead of 322  
21 it should be -- let me --

22 A. It should be pound sign 93.

23 Q. Got it. Okay.

24 A. My next supplement is dated 4/26 of '23.

25 It's, you know, one small paragraph.

1 Q. Right.

2 A. And then 5/2/2023.

3 Q. Yes.

4 A. And then 8/11/2023.

5 Q. Okay. Are those all supplements and that --

6 A. Those are all my supplements in reference to  
7 this case.

8 Q. Okay.

9 And -- and you've had an opportunity to review  
10 those -- all those supplements for completeness and  
11 accuracy and -- with the exception of the search warrant  
12 numbers that we just discussed was there any other --  
13 excuse me -- any other corrections? Anything else you  
14 need to add?

15 A. I would -- I need to -- there's a scrivener's  
16 error with the Circle K where the surveillance was  
17 located for the Circle K.

18 Q. Go ahead.

19 A. It should be at 1497 South Belcher Road and  
20 specifically it is Store Number 7628.

21 Q. Okay. Anything else?

22 A. That I can think of right now? Not that I can  
23 think of.

24 Q. Okay.

25 I can't remember if you have statements of

1 witnesses in your reports but assuming you do, is it  
2 fair for me to assume that if it's in quotation marks  
3 it's a quote and if it's not in quotation marks it's a  
4 summary of what the person told you?

5 A. That would be correct.

6 Q. Okay.

7 Is there anything else that you've done in this  
8 case that's not covered in your reports and that we have  
9 not discussed during these two days of depositions?

10 A. Not that I can think of.

11 Q. Okay.

12 MR. BRUNVAND: I don't believe I have any  
13 other questions.

14 MR. VONDERHEIDE: I have no questions. Thank  
15 you.

16 MR. BRUNVAND: Okay. Do you want -- do you  
17 want to read or waive?

18 THE WITNESS: I'll read. It doesn't matter.  
19 I mean, they -- it's all -- it's video recorded so  
20 I mean we've got an accurate representation of  
21 everything. So whatever is easiest.

22 MR. BRUNVAND: Okay.

23

24 THEREUPON, the virtual deposition concluded at  
25 1:17 p.m.

CERTIFICATE OF OATH

STATE OF FLORIDA  
COUNTY OF PINELLAS

I, the undersigned authority, certify that  
DETECTIVE JERRY HUNT personally appeared before me  
January 7, 2025 and was duly sworn via Zoom Video  
Communications.

Witness my hand and official seal this 25th  
day of January, 2025.



*Kimberly L. Renfro*

KIMBERLY L. RENFROE, RPR  
Notary Public, State of Florida  
Commission No.: HH 80650  
Expiration date: 1/31/25

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## 1 REPORTER'S CERTIFICATE

2 STATE OF FLORIDA

3 COUNTY OF PINELLAS

4 I, KIMBERLY L. RENFROE, Registered Professional  
5 Reporter, certify that I was authorized to and did  
6 stenographically report the virtual deposition of  
7 DETECTIVE JERRY HUNT; that a review of the transcript  
8 was requested; and that the transcript is a true and  
9 complete record as I understood it to be.

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

15 Dated this 25th day of January, 2025.

16  
17   
18 \_\_\_\_\_  
KIMBERLY L. RENFROE, RPR  
Stenographic Reporter

19  
20  
21 (Transcript was ordered by Bjorn E. Brunvand,  
22 Esquire, on January 7, 2025.)  
23  
24  
25

January 25, 2025

Detective Jerry Hunt  
xxxxx@xxxxx.com

Dear Detective Hunt:

Your deposition taken in the case of State of Florida v. Tomasz Kosowski on January 7, 2025 has been transcribed. Per your request to review the transcript, it is being held at our office at 728 South New York Avenue, Lakeland, Florida, until February 28, 2025.

Please call 863-500-3603 to make arrangements to do this during our regular business hours of 8:30 a.m. to 5:00 p.m.

Thank you for your prompt attention to this matter.

Sincerely,

Kimberly L. Renfroe, RPR