

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

23-02935-CF-D  
522023CF002935000APC

STATE OF FLORIDA

v.

MURDER IN THE FIRST DEGREE

TOMASZ ROMAN KOSOWSKI  
PID: 312109281

MEMORANDUM OF LAW IN RESPONSE TO DEFENDANT'S  
MOTION TO SUPPRESS SEARCH WARRANT TOYOTA COROLLA

Comes now, BRUCE BARTLETT, State Attorney for the Sixth  
Judicial Circuit of the State of Florida, by and through his  
undersigned Assistant State Attorney, and hereby files its  
Memorandum of Law in Response to Defendant's Motion to Suppress,  
to wit:

1. Affiant Jerry Hunt developed probable cause to search this  
Toyota Corolla prior to submitting a search warrant.
2. He began drafting the warrant while in the Miami Area  
searching for the car.
3. On March 24, 2023, Affiant Hunt determined that Largo  
Police Department had probable cause to search Defendant's  
Toyota Corolla. A law enforcement only BOLO was  
disseminated requesting that if contact was made with the  
vehicle or the Defendant that Largo PD be notified.
4. On March 25, 2023, Tarpon Springs Police Department

stopped this Toyota Corolla driven by Defendant.

5. Defendant was the sole occupant in the car.
6. On March 25, 2023, Largo Police Department Detective Jerry Hunt electronically submitted via CloudGavel an Affidavit for Search Warrant to search Defendant's Toyota Corolla which was stopped in Tarpon Springs, Pinellas County, Florida.
7. On March 25, 2023, Judge Joseph Bulone, Circuit Court Judge of the Sixth Judicial Circuit, signed the Warrant.
8. The direction of the search warrant authorized the search  
"TO ANY OFFICER OR AGENT OF THE TARPON SPRINGS POLICE DEPARTMENT, THE PINELLAS COUNTY SHERIFF'S OFFICE.
9. On March 25, 2023, at around 1659 hours, Tarpon Springs Police Department read the warrant to the Toyota Corolla.
10. An officer from Tarpon Springs Police Department requested a tow of the vehicle.
11. Tarpon Police Department has a contract with the Pinellas County Sheriff's Office to provide forensic processing.
12. Largo Police Department has a contract with the Pinellas County Sheriff's Office to provide forensic processing.
13. Pinellas County Sheriff's Office forensic department processed the vehicle and collected evidence, both at 34

Orange Street, Tarpon Springs, Florida and the processing facility of the Pinellas County Sheriff's Office.

14. Members of the Largo Police Department were present at the search, but did not conduct the search or seizure of evidence.
15. Pinellas County Sheriff's Office forensic units conducted the processing and search of the vehicle with the assistance of Largo Police Department Officers.
16. Tarpon Springs Department Officers also searched items in the vehicle.
17. Largo Police Department observed the Toyota Corolla for identifying information, like the VIN and description of the vehicle, and also for a protective sweep.
18. None of the information gathered was pled in the search warrant nor seized.
19. Ultimately, the Toyota Corolla was transferred to the custody of Largo Police Department where it is stored where Largo Police Department stores vehicles which are evidence of a crime.
20. Defendant's bases for suppression include the following:
  - a. The search warrant lacks PC in the four corners of the document;

- b. There is no nexus to evidence of the crime and the Toyota Corolla;
- c. There are material omissions which, if added, would vitiate the probable cause in the affidavit;
- d. Law enforcement acted unlawfully in searching the car prior to the issuance of a search warrant;
- e. Largo Police Department conducted the search despite being out of jurisdiction and not authorized in the direction; and
- f. The search was conducted in violation of the direction in the warrant to be conducted at Largo Police Department.

For the below stated reasons the undersigned requests this Court deny Defendant's Motion to Suppress the Toyota Corolla.

STANDARD OF REVIEW FOR TRIAL COURT

When a search warrant is subject to a suppression motion, the Defendant has the burden to demonstrate that the search or seizure is invalid. This Trial Court reviewing a probable cause affidavit in a suppression motion should examine the four corners of the document. Pagan v. State, 830 So.2d 792,806 (Fla. 2002). As a result, this Court should examine to see if the four corners of the document establish probable cause that evidence of a crime will be located inside the Corolla. Id. quoting Illinois v. Gates,

462 U.S. 213 (1983).

Errors resulting from mere negligence or mistake will not vitiate probable cause as established in the four corners of the document. Franks v. Delaware, 438 U.S. 154, 171 (1978).

Material Omissions of facts can further be challenged, but omissions are permitted in a search warrant. The Florida Supreme Court stated: "Some omissions may be "intentional" but also reasonable in the sense that they exclude material police in good faith believed to be marginal, extraneous, or cumulative." Johnson v. State, 660 So.2d 648,656 (Fla. 1995). In the process of establishing probable cause, an Affiant can eliminate unnecessary information "Such an exclusion is a valid and necessary part of the warrant process." Id.

Whether the omissions are material and were made with the intent to deceive or with reckless disregard of whether such information should be revealed to a magistrate is the proper analysis to determine if a warrant runs afoul of Franks. Pagan at 807. If the Court finds the errors are a product of deliberate falsehood or reckless disregard for the truth, the reviewing trial court should excise the errors from the probable cause affidavit. Id.

When the Court has excised those errors, then the Court would analyze the remaining information and determine if probable cause

still existed. Id. Material omissions can be considered by this Court should the Court find that the omissions, if added, would vitiate probable cause, and the omissions were a result of reckless disregard for the truth or deliberate falsehood. Johnson v. State, 660 So.2d 648 (Fla. 1995). Omissions from negligence or mistake cannot be considered in analyzing whether probable cause still exists. If this Court finds a reckless disregard for the truth or a deliberate falsehood was responsible for the material omissions then the Court would add the omitted material and determine if the added material vitiated probable cause. Thorp v. State, 777 So.2d 385, 391 (Fla. 2000).

The Affidavit Established Probable Cause to Establish the Commission Element

In the four corners of the affidavit, the Affiant established his belief that evidence of a crime of homicide would be found inside the Toyota Corolla.

A search warrant must be based on probable cause supported by an affidavit. Art. I, § 12, Fla. Const. To establish probable cause, the affidavit must set forth two elements: (1) the commission element—that a particular person has committed a crime—and (2) the nexus element—that evidence relevant to the probable criminality is likely to be located at the place searched. State v. Vanderhors, 927 So.2d 1011 (Fla. 2d DCA 2006), citing Burnett v. State, 848 So.2d 1170, 1173 (Fla. 2d DCA 2003).

Probable cause according to the Fourth Amendment requires a

showing that particular evidence of a particular crime will probably be found in a particular place. The probable cause determination is entrusted to the judgment of a neutral magistrate. And that determination simply asks whether a reasonably prudent person would think the allegation probable. Dunnavant v. State, 46 So. 2d 871, 874-75 (Fla. 1950). That the inquiry lacks specificity is by design. Probable cause is "incapable of precise definition or quantification into percentages because it deals with probabilities and depends on the totality of the circumstances." Maryland v. Pringle, 540 U.S. 366, 371, 124 S.Ct. 795, 157 L.Ed.2d 769 (2003). The First District Court of Appeal described probable cause as the following:

Probable cause is not rigid nor is it a standard that is particularly difficult to meet—probable cause is a relatively low legal burden, "more than a bare suspicion but less than evidence that would justify a conviction." Probable Cause, Black's Law Dictionary (11th ed. 2019); see also Stacey v. Emery, 97 U.S. 642, 645, 24 L.Ed. 1035 (1878) (describing probable cause as "[a] reasonable ground of suspicion, supported by circumstances sufficiently strong in themselves to warrant a cautious man in" believing the allegation). Law enforcement must convince a neutral arbiter that the evidence it has obtained is sufficient to conclude a person probably committed a crime and that evidence of a crime is probably in a particular place. This reasonably-prudent-person analysis is contextual and, by its nature, does not include exacting time limits. It is no math equation; it is an exercise of judgment. In this light, the appellate court's role, broadly considered, is to ensure a neutral magistrate gave meaningful review to test the basis of the oath and to ensure the warrant's limited scope. Malden v. State, 359 So.3d 442, 445 (Fla. 1<sup>st</sup> DCA 2023).

In the instant case, Affiant Hunt described at length the path taken by the Defendant's unregistered Toyota Tundra from 1501 S. Belcher to Defendant's home, the circumstances surrounding the disappearance of S.C., including S.C. leaving without his phone, wallet, keys, and vehicle. Also described was Defendant's potential motive and the prior interactions with S.C. and the Defendant. S.C.'s body was not recovered at 511 Seaview. The wagon and blanket were not recovered at 511 Seaview. A review of the totality of the evidence detailed in the warrant leads only to the conclusion that particular evidence of a particular crime will be found in the vehicle driven by the Defendant. To date, S.C.'s body has not been recovered. Reliance on Goesel v. State is misplaced in the instant case. While Affiant Hunt's pedigree was not populated into the warrant, nothing in the affidavit required specialist knowledge like that contemplated in the Goesel case. Goesel v. State, 305 So.3d 824 (Fla. 2d DCA 2020) (Description of child pornography with no knowledge established by affiant).

The Affidavit Established Probable Cause to Establish the Nexus Element

Affiant Hunt described the following related to the evidence that could be located in the Toyota Corolla:

the garage floor was tested with Luminol and had a positive reaction. Through further forensic processing, areas of possible blood were located and tested positive through



presumptive testing. Through your Affiant's training and experience this could be consistent with an area of blood being cleaned off of the garage floor. This could also be consistent with blood saturated items being transferred from the grey Toyota Tundra to another vehicle (Toyota Corolla).

Additionally, on the date S.C. went missing, the Defendant parked his unregistered Toyota Tundra in his garage and then left in this Corolla. Affiant Hunt further stated in the warrant:

Your Affiant is aware that a body was not located during the search of the residence. Additionally, the clothing worn and the wagon with the orange or red blanket was not located. Due to the totality of the circumstances your Affiant has strong probable cause that the Toyota Corolla has been utilized in an attempt to avoid apprehension and to transport evidence of the said crime to an unknown location.

The reasons for probable cause to believe items of evidence would be located in the Corolla were adequately explained in order to establish that items of evidence relevant to the probable criminality is likely to be located in the vehicle.

The Affidavit did not mislead the Issuing Court, did not Omit critical facts, and did not rely on illegally obtained information.

If the challenge relates to omitted facts the court must examine whether the omissions were made with the intent to deceive or with reckless disregard of whether such information should be

revealed to a magistrate. Pagan at 807. If the Court finds the errors are a product of deliberate falsehood or reckless disregard for the truth, the reviewing trial court should excise the errors from the probable cause affidavit. Id. When the Court has excised those errors, then the Court would analyze the remaining information and determine if probable cause still existed. Id. Material omissions can be considered by this Court should the Court find that the omissions, if added, would vitiate probable cause, and the omissions were a result of reckless disregard for the truth or deliberate falsehood. Johnson v. State, 660 So.2d 648 (Fla. 1995). Omissions from negligence or mistake cannot be considered in analyzing whether probable cause still exists. If this Court finds a reckless disregard for the truth or a deliberate falsehood was responsible for the material omissions then the Court would add the omitted material and determine if the added material vitiated probable cause. Thorp v. State, 777 So.2d 385, 391 (Fla. 2000). Defendant must show that the omissions are material and withheld by law enforcement with an intent to deceive prior to holding an evidentiary hearing on the issue. Johnson v. State, 660 So.2d 648 (Fla. 1995). The Court must determine: whether omitted material, if added to affidavit, would have defeated probable cause, and reviewing court must find that omission resulted from intentional or reckless police conduct that

amounts to deception and if all requirements are met by moving party, then full evidentiary hearing will be ordered. Id. at 656.

In the instant case, none of the information omitted from the affidavit can be considered material omissions.

The challenge with omissions as stated by the Johnson Court:

Such an exclusion is a valid and necessary part of the warrant process. Moreover, some omitted information is simply overlooked in the exigencies of the moment without intent to deceive or recklessness with respect to the truth. The State and the defense reasonably may disagree as to the import and effect of the large amount of information that necessarily will be omitted in the warrant process, since police routinely collect far more information than goes into the affidavit. Id.

The following is a list and analysis of the alleged omitted material:

**1. Celeste Bacher observed a person of interest.**

Affiant Hunt did not include any information provided by Celeste Bacher in the affidavit for probable cause. Celeste Bacher told law enforcement that she observed man around 9:30 a.m. on March 21, 2023. He was wearing a "Jack Hannah" safari style shirt and had a goatee. She believed him to work for the veterinary office given his clothing. Celeste Bacher participated in a photopack related to her observations.

The information provided by Celeste Bacher did not include any information about the party *pulling the wagon containing the*

*body of S.C. out of the lobby of 1501 S. Belcher Road.* However, when she observed Defendant's photo in the photopack she said it was "maybe" or a "chance" it was the person she observed. Other people were eliminated except for one other person where she stated "in question" or a "chance."

An affidavit for search warrant is analyzed by the totality of all evidence presented in the affidavit. Crucially, the information provided in the warrant include sworn statements that the person of interest pulling the wagon to Defendant's unregistered Toyota Tundra:

Your Affiant continued reviewing surveillance video. At approximately 10:22:18 hours your Affiant observed a male wearing jeans, a blue short-sleeve shirt, a backpack, *white surgical mask* and hat exit the main entrance of the law firm.

Given that in the totality of the affidavit that the suspect was wearing a surgical mask, the information that Celeste Bacher observed a goateed man that was indicated in a photo-pack as *Maybe* or a *chance* that is in fact the Defendant is immaterial to the search warrant. This information is the information contemplated when the Johnson Court stated: "The State and the defense reasonably may disagree as to the import and effect of the large amount of information that necessarily will be omitted in the warrant process, since police routinely collect far more information than goes into the affidavit." The photo-pack and testimony of Celeste Bacher can be debated by either side as to

its significance.

Even if the omissions were found by this Court to be material information, Defendant has to prove that Affiant Hunt intended to deceive the Court by not including the information. In this case, Affiant Hunt simply overlooked this information in the exigency of the moment and did not intend to deceive the Court. Moreover, were the Court to find this information material and that Affiant Hunt deceived the Court, then the information would be added to the warrant and analyzed to see whether it would tend to vitiate probable cause. The photopack involving Defendant is arguably *more probable cause* to show Defendant was at 1501 S. Belcher Road on the day of the homicide.

**2. S.C. suffered from anxiety and was a recovering alcoholic.**

The disappearance of S.C. and the evidence leading to the conclusion that evidence related to his disappearance would be found at 511 Seaview Drive. Information about having diagnosed anxiety and having been a recovering alcoholic would have no materiality as it relates to his disappearance. The Search Warrant describes S.C.'s personal belongings being left behind including but not limited to his cellphone, wallet, keys, and vehicle.

Additionally, at the time the warrant was submitted to Judge

Bulone, multiple witnesses expressed that S.C.'s anxiety and substance abuse was not an issue that would have led to his disappearance. In fact, Michael Montgomery, Jake Blanchard, and S.C.'s father, George Cozzi, all expressed concern that he was missing precisely because they did not believe he absconded due to a relapse, which hadn't been a problem for years, nor due to anxiety, which he had under control. George Cozzi described S.C.'s anxiety as when someone gets worked up or having too much going on, but not to the level of hospitalization. Michael Montgomery described S.C. as having no current serious issues relating to anxiety or alcoholism and described the day of S.C.'s disappearance as a normal day. Michael stated S.C. was the opposite of impulsive.

The exclusion of the above information is consistent with the reasoning outlined in Johnson. Law enforcement cannot include everything in a search warrant. Even if the omissions were found by this Court material, Defendant has to prove that Affiant Hunt intended to deceive the Court by not including the information. There is zero evidence to suggest anything other than police routinely collecting far more information than goes into the affidavit.

**3. Fingerprints located in closet located in close proximity to S.C.'s office.**

In the totality of the circumstances of the instant case, the location of Defendant's fingerprints are material to a place where he did not belong, e.g. the closet located directly outside of the office of S.C. That other fingerprints were located in a closet is immaterial to the inquiry of whether Defendant was authorized or should have been inside of the closet.

The law office was inside of a building that was open to guests, clients, and employees of the businesses contained therein. It would be unusual to not have hundreds of fingerprints in such a space. This is the kind of information contemplated by the Court in Johnson. While the remaining one hundred plus prints are to be expected in various places of the office building, Defendant's prints in a storage closet next to S.C.'s office are unexpected precisely because he was not authorized to be in that particular closet at that particular place, nor would there be any reason for him to be in that closet.

Even if the omissions were found by this Court material, Defendant has to prove that Affiant Hunt intended to deceive the Court by not including the information. There is no evidence that this information was left out of the Affidavit for any other reason than that which is contemplated by the ruling in Johnson.

**4. Volume of Blood located in the bathroom at 1501 S Belcher  
Road**

The search warrant affidavit pled the following information as it relates to the blood located in the bathroom at 1501 S. Belcher Rd. Your Affiant entered the men's restroom in the office building.

While on scene at 1501-B S Belcher Rd, your Affiant entered the men's restroom in the office building. Your Affiant observed what appeared to be a red liquid smeared on the exterior of the men's restroom door. Your affiant observed what appeared to be drops of a red liquid on the single toilet stall wall to the left of the single urinal. In your affiants training and experience as a law enforcement officer, the liquid appeared to be blood. In your Affiant's training and experience, a similar red liquid, consistent with blood, was observed smeared on the exterior of the toilet bowl in the single stall. Your affiant observed what appeared to be a dark liquid on the floor of the single stall that appeared to have been dried and smeared in a circular motion. Your affiant observed that the room smelled strongly of cleaning products. From the smell and the condition of the room it appeared attempts were made to clean up the liquid on the floor.

The Affiant further stated: "Your Affiant learned from PCSO Forensic Specialist A. Camacho that the red substance tested positive as blood." Never in the affidavit does the Affiant swear to any information misleading the Court. The Affiant very clearly states the information about the blood and makes no leaps as it relates to overstating the amount of blood located in the bathroom. Also, DNA processing had not occurred at this early stage of the investigation.



Amber Camacho is a supervisor with PCSO forensics. Nothing in the affidavit suggests anything other than her providing information to Affiant Hunt in her capacity as a supervisor. There is no misrepresentation or omissions of material facts relating to that info in the search warrant.

**5. Blood at 511 Seaview.**

Affiant Hunt also mentioned a red liquid substance that was consistent with blood in the truck bed of the Toyota Tundra. He also stated the substance tested presumptive positive for the presence of blood. He then stated that he spoke with Supervisor Kristen Stropes who indicated the garage floor at 511 Seaview Drive was tested with Luminol and had a positive reaction indicating that blood saturated items could have been transferred from the Tundra to the Corolla. Supervisor Stropes is a supervisor in Forensics at the Pinellas County Sheriff's Office capable of relaying information obtained in an investigation. There is no misrepresentation or omissions of material facts relating to info in the search warrant.

**6. Defendant's profession and self-proclaimed hobby.**

While Defendant owned a tremendous amount of firearms, Law enforcement was and is currently unaware whether Defendant hunted as a hobby. While aware that Defendant was employed as a plastic surgeon, Affiant Hunt did not expect his profession to allow for

blood being in various locations around Defendant's truck and garage. In the totality of the circumstances, the addition of this information would not tend to add to nor vitiate a probable cause finding by the Court. This is the kind of information contemplated by the Court in Johnson.

Law Enforcement Did Not Act in Bad Faith nor did Law Enforcement Search the Corolla prior to the issuance of the Search Warrant.

Defendant alleges that members of Largo Police Department conducted a "search" of the Corolla prior to the issuance of a search warrant. Detective Bolton opened a door and the trunk and looked inside. The intention of that was a cursory or protective sweep to determine whether S.C.'s body was located in the trunk of the vehicle. Nothing observed was sworn to in the affidavit, and nothing was seized, collected, or photographed as a result of the officer looking inside of the vehicle.

Additionally, a search of a vehicle does not require a search warrant when a member of law enforcement has probable cause to believe the vehicle has evidence of a crime. State v. Gardner, 72 So.3d 218 (Fla. 2d DCA 2011). Citing Michigan v. Thomas, the Second District Court of Appeal stated: "When police officers have probable cause to believe there is contraband inside of an automobile that has been stopped on the road, the officers may conduct a warrantless search of the vehicle, even

after it has been impounded and is in police custody.” State v. Gardner, 72 So.3d 218 (Fla. 2d DCA 2011) (citing Michigan v. Thomas, 458 U.S. 259, 261 (1982)). Affiant Hunt had probable cause to search the vehicle the day before he finalized and submitted the affidavit to the Court. As a result, a search of the vehicle was justified *without a warrant*.

The vehicle was seized by Tarpon Springs Police Department and processed by the Pinellas County Forensics Unit. The vehicle was towed to the Pinellas County Forensic processing facility. Both TSPD and LAPD have a contract with PCSO to provide forensic support in cases. The Pinellas County Forensic processing facility is in Largo jurisdiction.

Florida Statute 933.08 provides: “The search warrant shall in all cases be served by any of the officers mentioned in its direction, but by no other person except in aid of the officer requiring it, said officer being present and acting in its execution.” Florida Statute 933.08. Law enforcement officers can act in aid of the officer requiring it. Id. In State v. Vargas, the Florida Supreme Court suppressed a blood analysis where the officer named in the direction sat down and did nothing while the officer not named in the direction for Search warrant for blood sample read the warrant to accused, transported the accused to hospital for blood test, and took

custody of blood sample. State v. Vargas, 667 So.2d 175 (Fla 1995). The officers named in the direction did nothing except be present in the room. Id. at 176. The Florida Supreme Court stated: "We read the statute to allow the recruitment, by an authorized officer, of assistance in performing search-related tasks that are numerous, repetitive, or burdensome. The statute surely does not endorse the vacation of basic duties by the authorized officer." Id. at 177. In the instant case, Tarpon Spring Police Department read the warrant, completed the impound paperwork, and seized items from the car. The Pinellas County Sheriff's Office was specifically named in the direction of the warrant. The Pinellas County Sheriff's Office forensic processing unit, processed the vehicle, seized items of evidence, and utilized the assistance from Largo Police Officers. This level of assistance is allowed by Florida Statutes and case law. Officers with the Largo Police Department were fully aware of the restrictions on their role in the service of the warrant and acted accordingly.

The Good faith exception to the exclusionary rule would apply under the circumstances of the issuance of the search warrant in the instant case if the Court found no probable cause.

Even if the Defendant's argument that probable cause was vitiated by material omissions, the good faith exception

applies. State v. Rodriguez Lopez, 378 So.3d 691

If the affidavit in support of a search warrant fails to establish probable cause to support issuance of a warrant, the evidence will be admitted under the good faith exception if the officer has acted in an objectively reasonable manner and in objective good faith. Gonsalvez v. State, 38 So.3d 226, 229 (Fla 2d DCA 2010). The good faith exception would not apply when dishonestly, recklessly, or under circumstances in which an objectively reasonable officer would have known the affidavit or the existing circumstances were insufficient to establish probable cause. Id. Whether there is a good faith exception does not apply to the instant case because the affidavit establishes probable cause in the four corners of the affidavit.

A search of a vehicle does not require a search warrant provided law enforcement has probable cause to search the vehicle.

A search of a vehicle does not require a search warrant when a member of law enforcement has probable cause to believe the vehicle has evidence of a crime. State v. Gardner, 72 So.3d 218 (Fla. 2d DCA 2011). Citing Michigan v. Thomas, the Second District Court of Appeals stated: "When police officers have probable cause to believe there is contraband inside of an automobile that has been stopped on the road, the officers may conduct a warrantless search of the vehicle, even after it has

been impounded and is in police custody.” State v. Gardner, 72 So.3d 218 (Fla. 2d DCA 2011) (citing Michigan v. Thomas, 458 U.S. 259, 261 (1982)). See also State v. Ross, 209 So.3d 606 (Fla. 2d DCA 2016). Affiant Hunt had probable cause to search the vehicle the day before he finalized and submitted the affidavit to the Court. As a result, a search of the vehicle was justified without a warrant.

The vehicle was seized by Tarpon Springs Police Department and processed by the Pinellas County Forensics Unit. The vehicle was towed to the Pinellas County Forensic processing facility. Both TSPD and LAPD have a contract with PCSO to provide forensic support in cases. The direction of the warrant further authorized the transfer of the vehicle to the custody and location of the Largo Police Department. Once at that location, after the seizure by Tarpon Springs and the transfer to the custody of LAPD, probable cause would allow a search of the vehicle without a search warrant. That the vehicle was searched by Pinellas County Sheriff's Office at the forensic processing bay for PCSO instead of at the Largo Police Department is immaterial. The PCSO forensic processing facility is in Largo Jurisdiction and the vehicle was ultimately transferred to the custody of Largo Police Department.

Conclusion

This Court should deny the Defendant's Motion to Suppress the Vehicle Search Warrant. The four corners of the document establish probable cause. Affiant Hunt made no material omissions in the Affidavit for Search warrant. The search was conducted consistently with jurisdictional principles. Finally, and fundamentally, a vehicle search does not require a search warrant provided law enforcement officers have probable cause to search the vehicle.

WHEREFORE, the State of Florida moves this Honorable Court to deny the Defendant's Motion to Suppress the Search Warrant of Defendant's Corolla.

I HEREBY CERTIFY that a copy of the above has been furnished to Bjorn Brunvand, Esq, Attorney, BRUNVAND WISE P A, 615 TURNER ST, CLEARWATER, FL 33756, bjorn@acquitter.com, by e-service or personal service or U.S. Mail this 16th day of April, 2025.

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