

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

**STATE OF FLORIDA**

**23-02935-CF**

**v.**

**CAPITAL MURDER**

**TOMASZ ROMAN KOSOWSKI /**

**MOTION TO WITHDRAW AS COUNSEL DUE TO CONFLICT**

Petitioners, Bjorn E. Brunvand, J. Jervis Wise, Amanda Powers Sellers and Debra B. Tuomey, counsel for the above-captioned Defendant, moves this Court for the entry of an Order permitting counsel to withdraw as counsel for the above-named Defendant. Defendant is charged with one count of murder in the first degree, a capital felony and the State of Florida is seeking the death penalty. As grounds for said motion, movant would show:

After a review of circumstances of this representation and taking into consideration the ethical requirements of the Florida Bar Rules Regulating Professional Conduct, the undersigned counsel certify that an ethical conflict of interest precludes them from any further representation of Defendant in the above-styled case. Circumstances surrounding further representation will impair the zealous and effective representation of the client. Disclosure of the nature of the conflict would potentially breach attorney client privilege and a motion to withdraw must be granted regardless of whether the conflict is disclosed. See

*Young v. State*, 189 So. 3d 956(Fla. 2nd DCA, 2016); *Smith v. State*, 156 So.3d 1119, 1122 (Fla. 1st DCA 2015); and *Brower v. State*, 267 So.3d 524 (Fla. 5<sup>th</sup> DCA 2019).

We certify that we have reviewed viable alternatives to withdraw and there are *no* alternatives that would remedy the conflict of interest.

WHEREFORE Bjorn E. Brunvand, J. Jervis Wise, Amanda Powers Sellers and Debra B. Tuomey, and the respective corporate entities set forth below respectfully requests that this Honorable Court enter an order withdrawing them and their offices as counsel for the Defendant in this cause. Counsel further request that defendant be allowed sufficient time to seek alternate counsel.

s/ J. Jervis Wise  
J. JERVIS WISE  
BRUNVAND & WISE  
LAW GROUP  
Florida Bar No. 0019181

s/ Bjorn E. Brunvand  
BJORN E. BRUNVAND  
BRUNVAND & WISE  
LAW GROUP  
Florida Bar No. 0831077

s/ Debra B. Tuomey  
DEBRA B. TUOMEY  
Debra B. Tuomey, LLC.  
Florida Bar No. 497681

s/ Amanda Powers Sellers  
AMANDA POWERS SELLERS  
Amanda Powers Sellers, PA  
Florida Bar No. 11643

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been electronically served upon the Office of the State Attorney and defendant on April 30, 2025.

s/Bjorn E. Brunvand  
BJORN E. BRUNVAND, ESQ.  
BRUNVAND & WISE  
LAW GROUP  
615 Turner Street  
Clearwater, Florida 33756  
Telephone No. (727) 446-7505  
Facsimile No. (727) 446-8147  
Email: [bjorn@acquitter.com](mailto:bjorn@acquitter.com)  
Florida Bar No. 831077  
Counsel for the Defendant