

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

STATE OF FLORIDA  
Plaintiff,

CASE NO: 23-CF-2935

v.

TOMASZ KOSOWSKI,  
Defendant,

\_\_\_\_\_ /

**MOTION TO APPOINT CO-COUNSEL**

The Defendant, TOMASZ KOSOWSKI, by and through the undersigned counsel, pursuant to Fla. Stat. §27.40 and Fla. Crim. P. 3.112, hereby moves this Honorable Court to enter an Order appointing qualified co-counsel to represent the Defendant in the instant cause and authorizing the expenditure of funds from the State of Florida to pay for the services of said co-counsel and, as grounds therefore, states as follows:

1. The Defendant, TOMASZ KOSOWSKI, has been charged by Indictment with CAPITAL FELONY MURDER IN THE FIRST DEGREE.
2. The State of Florida has filed a Notice of Intent to Seek the Death Penalty.
3. At the outset of this case, this Court declared Mr. Kosowski indigent and appointed counsel to represent him.
4. Because the State is seeking the death penalty in this death penalty eligible case, the Defendant requires the assistance of qualified co-counsel to represent him.
5. The undersigned has contacted Jane A. McNeill, 130 South Indian River Drive, PMB 121, Fort Pierce, FL 34950, a qualified attorney in the Sixth Judicial Circuit of Florida.

Mrs. McNeill has advised that she is willing and able to represent Mr. Kosowski as co-counsel alongside the undersigned counsel in this matter.

6. The undersigned counsel does not believe that he can provide Mr. Kosowski with proper representation or the fair trial to which he is entitled unless the Court appoints qualified co-counsel to assist in the representation of Mr. Kosowski.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been electronically filed through Florida Courts E-Filing Portal and served upon the Justice Administrative Commission on July 03, 2025.

Respectfully Submitted,

/s/ Daniel M. Hernandez

DANIEL M. HERNANDEZ, ESQ.

DANIEL M. HERNANDEZ, PA

P.O. BOX 173165

Tampa, Florida 33672

info@danielmhernandezpa.com

Florida Bar # 229733

Attorney for the Defendant



Amy Murillo-Rios &lt;amy@danielmhernandezpa.com&gt;

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**SOF V. Kosowski**

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**JAC Pleadings** <pleadings@justiceadmin.org>  
To: Amy Murillo-Rios <amy@danielmhernandezpa.com>

Tue, Jul 8, 2025 at 10:04 AM

Dear Mr. Hernandez:

The Justice Administrative Commission (JAC) has received and reviewed the Motion to Appoint Co-Counsel (Jane McNeill) as to the above-referenced matter. JAC will not be filing a formal response and takes no position as to your motion. You may utilize this email in lieu of a formal response and should attach it to your motion when you provide it to the court.

Sincerely,

Christian Lake

Assistant General Counsel

Justice Administrative Commission

227 N. Bronough Street, Suite 2100

Tallahassee, FL 32301

Tel.: 850.488.2415

JAC Website: <https://www.justiceadmin.org>

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**From:** Amy Murillo-Rios <amy@danielmhernandezpa.com>

**Sent:** Wednesday, July 2, 2025 9:21 AM

**To:** JAC Pleadings <pleadings@justiceadmin.org>

**Subject:** SOF V. Kosowski

[EXTERNAL]

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# AMY MURILLO-RIOS

## LEGAL ASSISTANT

☎ 813.923.7961 ✉ amy@danielmhernandezpa.com

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