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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

| | | |
|---------------------------|---|---------------------------|
| FEDERAL FIREARMS |) | |
| LICENSEES OF ILLINOIS, |) | |
| et al., |) | |
| |) | Civil No. 3:23-cv-215-SPM |
| Plaintiffs, |) | |
| |) | |
| vs. |) | |
| |) | |
| JAY ROBERT "JB" PRITZKER, |) | |
| et al., |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

The videoconference deposition of PIASA ARMORY, LLC., Scott Pulaski, taken remotely via Zoom technology before A. CHRISTINE HYLTON, CSR, RPR, and Notary Public, pursuant to the Federal Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, at 10:06 a.m. Central Daylight Time on the 31st day of May, 2024.

1 APPEARANCES

2
3 SEAN A. BRADY, ESQ.
Michel & Associates, P.C.
4 180 E Ocean Boulevard, Suite 200
Long Beach, California 90802
5 Sbrady@michellawyers.com
6 Counsel for Plaintiff Pisa Armory, LLC

7 DAVID G. SIGALE, ESQ.
Law Firm of David G. Sigale, P.C.
8 55 W 22nd Street, Suite 230
Lombard, Illinois 60148
9 Dsigale@sigalelaw.com

10 Counsel for Plaintiff Harrell

11 ANDREW A. LOTHSON, ESQ.
Swanson, Martin & Bell, LLP
12 330 N Wabash, Suite 3300
Chicago, Illinois 60611

13 Alothson@smbtrials.com
14 Counsel for Plaintiff Barnett

15 JOHN HAZINSKI, ESQ.
MICHAEL TRESNOWSKI, ESQ.
16 Illinois Attorney General

17 115 S LaSalle Street
Chicago, Illinois 60603
John.Hazinski@ilag.gov
18 Michael.tresnowski@ilag.gov

19 Counsel for Defendants

20 KATELYN GANNON, ESQ.
Evans & Dixon
21 211 N Broadway Street, Suite 2500
Saint Louis, Missouri 63102

22 Kgannon@evans-dixon.com
23 Counsel for Defendant Walker
24

1 ANDREW HOERNER, ESQ.
2 Becker, Hoerner & Ysura, P.C.
3 5111 W Main Street
4 Belleville, Illinois 62226
5 Kah@bhylaw.com
6 Counsel for Defendant St. Clair County
7
8
9
10
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I N D E X

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E X H I B I T S

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(Exhibits to be attached to transcript)

1 PIASA ARMORY, LLC

2 SCOTT PULASKI,

3 Called as a witness after having been first duly
4 sworn, testified as follows:

5 DIRECT EXAMINATION

6 BY MR. HAZINSKI:

7 Q. Good morning, Mr. Pulaski. How are you
8 doing?

9 A. Good. Well.

10 Q. Thank you for being here today.

11 Before we get started, I just want to
12 note for the record that we served two notices of
13 deposition for Mr. Pulaski today. One is a 30(b)(6)
14 notice for Piasa Armory, and the other individual
15 notice to Mr. Pulaski.

16 I discussed with plaintiff's counsel,
17 Mr. Brady, before we started, that we'll just proceed
18 as one deposition, one transcript, and we'll demark
19 it between the two lines of questioning for each
20 of those notices as we go, so that we can simplify
21 matters a little bit.

22 Mr. Pulaski, you've given depositions
23 before, correct?

24 A. Just one, yes.

1 Q. One deposition.

2 So I'm going to go over some ground rules
3 you might be familiar with from that previous depo-
4 sition, but the goal is to help things go a little
5 more smoothly this morning.

6 So, first, do you understand that you're
7 under oath, the same as if -- as if you were testify-
8 ing in court?

9 A. I do.

10 Q. Since we have a court reporter on the line
11 who's taking down everything we're saying, it's
12 important that we try not to talk over each other, so
13 if you can wait until I finish asking questions to
14 answer, I will also try to avoid asking another
15 question before you finish answering, okay?

16 A. Yes.

17 Q. If you're looking at anything in front of
18 you, whether it's a piece of paper or something on
19 the screen, could you please let me know what it is
20 that you're looking at?

21 A. The only thing I have in front of me is the
22 computer screen and various pieces of blank paper on
23 my desk, so I have a blank notepad; and that's about
24 it.

1 Q. All right. If you end up looking at any
2 documents, pulling them on the computer or in paper
3 copy, please just let me know.

4 Is there anyone in the room with you
5 right now?

6 A. No, sir.

7 Q. If I don't -- if I ask a question that you
8 don't understand or that doesn't make sense to you,
9 please ask me to clarify it. If you answer the
10 question, I'll assume that you understood it; is that
11 fair?

12 A. Yes.

13 Q. That includes if there's an issue with
14 technology. Since we're using a Zoom platform, if
15 there's any glitch or technological issue, please let
16 me know; is that all right?

17 A. Yes.

18 Q. During the questioning, your attorney may
19 object to certain questions that I ask. You should
20 still answer the question, unless your attorney
21 specifically instructs you not to answer. Do you
22 understand?

23 A. Yes.

24 Q. I want to let you know that you can take a

1 break at any time during the deposition, whether to
2 use the restroom, or for any other purpose, but I
3 would just ask that you don't take a break while I
4 have a question pending to you; is that fair?

5 A. Yes.

6 Q. Do you have any medical conditions, or are
7 you taking any medication that might affect your
8 ability to give truthful testimony this morning?

9 A. I am not.

10 Q. Could you please state your full name for
11 the record?

12 A. My name is Eric Scott Pulaski.

13 Q. Mr. Pulaski, Piasa Armory is a plaintiff in
14 the Federal Firearms Licensees of Illinois versus
15 Pritzker case in the Southern District of Illinois,
16 No. 23-cv-215; is that correct?

17 A. Yes.

18 Q. You understand that case has been consoli-
19 dated with three other cases that are pending in that
20 same court, correct?

21 A. I do understand.

22 Q. And do you understand that your testimony
23 that you give today might be used in all of these
24 consolidated cases?

1 A. I do.

2 MR. HAZINSKI: I'd like to show you now
3 the first exhibit. I'll attempt to share my screen.

4 (Exhibit 1 marked.)

5 BY MR. HAZINSKI:

6 Q. Mr. Pulaski, do you see a document in front
7 of you that says Notice of Rule (30)(b)(6) Deposi-
8 tion?

9 A. I do.

10 Q. Have you seen this document before?

11 A. I have not.

12 Q. I'll scroll through it so you can look.

13 Does the second page of this document
14 with the number of paragraphs look familiar to you?

15 A. That doesn't look familiar to me, no.

16 I did receive notice through our
17 attorney, but I don't have a recollection of that
18 particular layout or page.

19 Q. So this isn't a document that you reviewed
20 in preparation for your deposition today, correct?

21 A. No.

22 MR. HAZINSKI: Sean, did you -- Can we go
23 off the record briefly?

24 THE COURT REPORTER: Yes.

1 MR. HAZINSKI: Thank you.

2 (Discussion held off the record.)

3 MR. HAZINSKI: We had a brief discussion
4 between myself and Mr. Brady.

5 I want to note for the record that to the
6 extent that Mr. Pulaski wasn't provided the specific
7 topics that we served in this Notice of 30 (b) (6)
8 Deposition in advance, that's not consistent with the
9 requirements of preparation for the format of this
10 deposition, and to the extent the witness is
11 unprepared to answer with respect to any of the
12 topics, we'll reserve the right to -- to redepose
13 the witness with proper preparation, as required in
14 Federal Rules.

15 Mr. Brady, can you confirm that
16 Mr. Pulaski is designated as the witness under Rule
17 (30) (b) (6) to testify on Piasa Armory's behalf as
18 to these listed topics?

19 MR. BRADY: As I indicated off the
20 record, Mr. Pulaski is the sole operator of Piasa
21 Armory, LLC, and so I can confirm that.

22 If you want to ask the witness if he
23 would be the most -- I mean, you can go through these
24 topics and ask the witness on the record.

1 MR. HAZINSKI: My question is just
2 whether he is the -- he is, in fact, the designee?

3 MR. BRADY: He is, in fact, the designee.

4 MR. HAZINSKI: That's -- that's all I'm
5 saying. Thank you.

6 Mr. Pulaski, what did you do to prepare
7 for this deposition?

8 THE WITNESS: Discussed these topics with
9 our attorney.

10 BY MR. HAZINSKI:

11 Q. On how many --

12 MR. BRADY: Objection to the extent it
13 calls for attorney/client communications.

14 BY MR. HAZINSKI:

15 Q. Mr. Pulaski, I'm not interested in the
16 substance of any conversations you've had with your
17 attorneys to prepare for this deposition, because
18 that's privileged; but can you tell me how many times
19 you met with your attorneys to prepare?

20 A. Twice.

21 Q. How long were each of those meetings?

22 A. I don't recall, somewhere between 30
23 minutes and one hour, approximately.

24 Q. Did you review any documents as part of

1 your preparation?

2 A. We did not.

3 Q. Mr. Pulaski, do you understand that you
4 have been designated under Rule (30)(b)(6) to testify
5 on Piasa Armory's behalf as to the topics listed in
6 this Notice of Deposition?

7 A. I do.

8 Q. Do you understand that that means that
9 with respect to these topics, your testimony will be
10 treated as Piasa Armory's testimony, for the purposes
11 of this case?

12 A. I understand.

13 Q. What is your role at Piasa Armory?

14 A. I am the owner of Piasa Armory.

15 Q. Are you familiar with all aspects of
16 Piasa's business operations?

17 A. I am.

18 MR. BRADY: Objection, vague as to all
19 aspects.

20 BY MR. HAZINSKI:

21 Q. Are you familiar the items Piasa offers for
22 sale?

23 A. I am.

24 Q. Does Piasa have any other employees?

1 A. We do.

2 Q. How many?

3 A. Approximately six that handle -- yes,
4 approximately six.

5 Q. Are there any other owners besides
6 yourself?

7 A. No.

8 Q. How long has Piasa Armory existed?

9 A. We were formed in 2012.

10 Q. And what services does Piasa offer?

11 A. Retail sales. We also do training and
12 gunsmith services, and we have a shooting range.

13 Q. Focusing on sales, does Piasa primarily
14 sell firearms to individuals or to other organiza-
15 tions?

16 A. We sell to both.

17 Q. Do you sell more frequently to individuals
18 than to organizations, or vice versa?

19 A. To individuals, more frequently.

20 Q. I'm going to refer throughout the deposi-
21 tion to a law called the Protect Illinois Communities
22 Act.

23 Are you familiar with that law?

24 A. I am.

1 Q. If I call it PICA, will you understand that
2 I'm referring to that law?

3 A. I will.

4 Q. Does Piasa sell firearms to individuals who
5 are exempt from PICA's restrictions on the purchase
6 of firearms?

7 A. We do.

8 Q. What proportion of Piasa's customers would
9 you say are exempt?

10 A. I couldn't put a number to it, but very,
11 very few.

12 Q. Does Piasa sell firearms to any organiza-
13 tions that are exempt from PICA's purchase restric-
14 tions?

15 A. We can, yes.

16 Q. Can you explain that?

17 A. Law enforcement agencies or certain other
18 government groups would be exempt from that.

19 Q. And Piasa sometimes sells to law enforce-
20 ment agencies and similar groups?

21 A. Yes.

22 Q. Is it fair to say that for the category
23 of Piasa's customers that are exempt from PICA's
24 restrictions, Piasa is able to continue selling the

1 same firearms that they were able to sell before PICA
2 went into effect?

3 A. Yes. We are still able to sell to exempt
4 people.

5 Q. Does Piasa sell firearms to other busi-
6 nesses?

7 A. We have in the past, but not frequently.

8 Q. What kinds of businesses?

9 A. Other firearm dealers.

10 Q. Other than law enforcement agencies and
11 similar governmental entities, does Piasa sell
12 firearms to any other groups or organizations?

13 A. Organizations, yes.

14 Q. Which ones?

15 A. Charitable organizations, such as Friends
16 of the NRA and Ducks Unlimited.

17 Q. Other than law enforcement agencies,
18 similar government organizations, and charitable
19 organizations like the ones you mentioned, does Piasa
20 sell firearms to any other groups or organizations?

21 A. We have the ability to sell to any other
22 organizations, but I do not recall any that we've
23 sold to recently.

24 Q. All right. Piasa Armory is currently a

1 plaintiff in a pending case in Madison County; is
2 that correct?

3 A. Yes, sir.

4 Q. And that case pertains to regulations of
5 firearms marketing, correct?

6 A. Yes.

7 MR. BRADY: Objection, vague as to
8 firearms marketing.

9 BY MR. HAZINSKI:

10 Q. In this litigation, are you aware if Piasa
11 has produced any copies of any of its advertising or
12 marketing materials?

13 A. Not to my knowledge; but my understanding
14 is that's not the scope of this testimony today.

15 Q. Has Piasa Armory been a party in any other
16 litigation apart from that Madison County case?

17 A. Just the Madison County case.

18 MR. HAZINSKI: All right. I'll show you
19 a -- another exhibit now. This, for the record, will
20 come in as Exhibit 2, and it's documents with a Bates
21 stamp Piasa_000437 through 449.

22 (Exhibit 2 marked.)

23 BY MR. HAZINSKI:

24 Q. Mr. Pulaski, are you able to see this

1 document that I shared?

2 A. Yes.

3 Q. Have you seen it before?

4 A. I have.

5 Q. What is it?

6 A. It's our Profit and Loss Statement for
7 2018.

8 Q. I'll script -- I'll scroll through the
9 document briefly, let you see the entire thing.

10 If you'd like me to go more slowly, or
11 you need to see another part of it, please just ask.

12 These documents show Piasa profits and
13 expenses for every year starting in 2018 through
14 2023, correct?

15 A. Correct.

16 Q. I want to return to the page stamped Piasa
17 437. One of the rows in this document is labeled
18 30100 Sales; it's the first row there.

19 Can you explain what's included in that
20 category?

21 A. Yes. That category says Firearm Sales.

22 Q. Well, there's a row that says 30100 that
23 just says Sales, and then below that is 30110, which
24 says Firearm Sales. Do you see that?

1 A. I do.

2 Q. Does the Sales line include the Firearm
3 Sales?

4 A. It does.

5 In the past we had broken out our Sales
6 by category, and we no longer do that as part of our
7 accounting practices.

8 Q. So data years after 2018 itemize which
9 sales are attributable to firearms, correct?

10 A. We may have some of that data split out
11 still, but in general, we just have a raw sales
12 number.

13 Q. All right. Are you paid a fixed salary, or
14 are you paid through an owner's draw?

15 A. I'm paid through a guaranteed payment.

16 Q. How does the guaranteed payment work?

17 A. The way that our accounting -- our tax
18 accountant explained to me was that I pay myself a
19 certain amount for a certain period.

20 For me, it's weekly.

21 Q. And do you determine that amount?

22 A. I do.

23 Q. So these documents show the overall profits
24 and losses of Piasa Armory for those years, 2018

1 through 2023, correct?

2 A. Yes.

3 Q. Which data in these documents show the
4 overall profitability of Piasa Armory?

5 A. My understanding is that that is the final
6 line on each year's Profit and Loss Statement.

7 Q. Are you referring to the line labeled Net
8 Income?

9 A. Yes.

10 Q. If you want to determine year over year
11 whether the business is doing better or worse, do you
12 compare the net income numbers to make that assess-
13 ment?

14 A. I typically compare our gross revenues and
15 the categories of items that we sell based on point
16 of sale data.

17 Q. So when you say "gross revenues," for
18 example, in the 2018 data, would that correspond to
19 the line that says Gross Profit?

20 A. Yes.

21 Q. And in 2018, that's approximately \$290,000,
22 correct?

23 A. I apologize.

24 I'm looking at the Total Income line

1 above the cost of goods sold.

2 Q. I see.

3 So the gross revenues correspond to the
4 line labeled Total Income; is that what you're
5 saying?

6 A. Yes.

7 Q. And in 2018, that number is about 958,000,
8 correct?

9 I'm sorry. If you answered, I didn't
10 hear.

11 A. I'm sorry, I didn't hear it was a question.

12 Yes, that says 958,000 on the line.

13 Q. Thank you.

14 Are the net income figures that you
15 identified that are the last line of each Profit and
16 Loss Statement, are those net income figures a good
17 reflection of the overall financial health of Piasa
18 Armory?

19 MR. BRADY: Objection, vague.

20 THE WITNESS: (Inaudible).

21 THE COURT REPORTER: What was the answer?

22 MR. BRADY: Mr. Hazinski, were you -- did
23 you finish your question? I'm sorry.

24 MR. HAZINSKI: The question was finished,

1 yeah.

2 MR. BRADY: Objection, vague, as to
3 overall health.

4 THE WITNESS: I am not an accountant, so
5 I don't speak to the overall financial health of our
6 company. That'd be for our tax accountant to take
7 care of.

8 BY MR. HAZINSKI:

9 Q. I suppose another way to ask the question
10 is in 2018, for example, there's a net income of
11 about negative \$20,000, right?

12 A. Yes.

13 Q. You still drew a salary in -- in that year,
14 as an owner of Piasa, right?

15 A. I do, yes.

16 Q. The net income might be higher or lower,
17 depending on how large the salary you draw is, right?

18 A. That's correct.

19 Q. If you wanted to compare the success of
20 your business year over year, that comparison would
21 depend on what you discussed, the gross revenues
22 rather than just the net income figure, right?

23 A. Correct.

24 Q. Piasa had roughly the same total income in

1 2022 as in 2023, correct?

2 A. I don't have those numbers memorized. I
3 would need to review them.

4 Q. Okay. I'm scrolling within the same
5 Exhibit 2 down to page marked Piasa_446. For 2022,
6 the total income was about \$867,000, correct?

7 A. Yes.

8 Q. In 2023, the total income -- this is on
9 Piasa_448 -- in 2023, the total income was
10 approximately \$854,000, correct?

11 A. Yes.

12 Q. So roughly 2% decrease; is that fair?

13 A. I would have to get a calculator for that,
14 but I'll assume you're correct.

15 Q. In 2021, the total income reflected on
16 Piasa_442 in Exhibit 2 was \$976,100, approximately,
17 correct?

18 A. Yes.

19 Q. Fair to say there was a much larger
20 decrease between 2021 and 2022 than there was between
21 2022 and 2023?

22 A. Yes.

23 MR. HAZINSKI: I'd like to show you
24 another document now. This one will be Exhibit 3 for

1 the deposition.

2 (Exhibit 3 marked.)

3 BY MR. HAZINSKI:

4 Q. Mr. Pulaski, are you able to see this
5 document titled Plaintiff Piasa Armory's Response to
6 State Defendants' Interrogatories, Set One?

7 A. I am.

8 Q. If the text is ever too small, or you're
9 having difficulty seeing it, please just let me know,
10 okay?

11 A. Yes.

12 Q. Do you recognize this document?

13 A. I do.

14 MR. HAZINSKI: Apologies to shift gears,
15 but I'll show one more document, which we'll mark as
16 Exhibit 4 for the deposition.

17 (Exhibit 4 marked.)

18 BY MR. HAZINSKI:

19 Q. Mr. Pulaski, can you see this document
20 titled Verification?

21 A. I do.

22 Q. Do you recognize it?

23 A. I do.

24 Q. This document contains your signature

1 swearing to the truth of the interrogatory responses
2 in Exhibit 3 that we just looked at, correct?

3 A. Yes.

4 Q. Before signing this Verification, did you
5 carefully review all of the interrogatory answers to
6 make sure that they're correct?

7 A. I did.

8 Q. Thank you.

9 I'll return to Exhibit 3.

10 Looking specifically at Interrogatory No.
11 4 and the response, Mr. Pulaski, do you see the
12 response to interrogatory No. 4 that states
13 "Responding Party has ceased offering for sale in
14 Illinois to non-exempts purchasers all items that
15 PICA restricts?"

16 A. I do.

17 Q. I'd like to clarify that answer.

18 Is it fair to say that Piasa Armory
19 didn't actually sell all items that PICA restricts?

20 A. Well, it's impossible to sell all items or
21 stock all items that PICA restricts. Some of them
22 are very difficult to acquire; however, we are able
23 to offer for sale or transfer ownership of items that
24 PICA restricts.

1 Q. Did PICA -- Strike that.

2 Did Piasa sell grenade launchers before
3 PICA went into effect?

4 A. We are able to sell grenade launchers, and
5 we had transferred ownership of a grenade launcher
6 before PICA existed.

7 Q. When you say "transferred ownership," can
8 you explain what that means?

9 A. Customers are allowed to purchase firearms
10 or any other items regulated by ATF, either online,
11 by phone, or in person out of state. When those
12 purchases are made, they must be sent to a dealer in
13 that purchaser's state, and that dealer must complete
14 the required 4473 and background check.

15 Q. Piasa transferred just one grenade launcher
16 in its history?

17 A. Yes.

18 Q. Did Piasa -- Strike that.

19 Before PICA went into effect, did Piasa
20 sell shotguns (inaudible) cylinders?

21 THE COURT REPORTER: Shotguns what?

22 MR. HAZINSKI: Shotguns with revolving
23 cylinders.

24 THE COURT REPORTER: Thank you.

1 THE WITNESS: Those firms are not common-
2 ly available for purchase. They're highly restricted
3 by ATF as an NFA-regulated items, National Firearms
4 Act-regulated item, and we have never transferred
5 ownership of one or sold one.

6 BY MR. HAZINSKI:

7 Q. When Piasa transfers ownership, does Piasa
8 receive proceeds from the sale?

9 A. We do.

10 Let me correct that.

11 We don't receive proceeds from the sale
12 of the item, we receive a fee for conducting the
13 background check and processing the paperwork.

14 Q. Thank you.

15 Before PICA went into effect, if a
16 customer had come into Piasa and asked to purchase a
17 shotgun with a revolving cylinder, what would have
18 you -- what would Piasa typically informed that cus-
19 tomer?

20 MR. BRADY: Objection, incomplete hypo-
21 thetical.

22 You can answer.

23 THE WITNESS: We would have directed the
24 customer to one of several online sites or auction

1 houses or other online retailers to search for that
2 item that they were looking for.

3 BY MR. HAZINSKI:

4 Q. Would Piasa have facilitated or partici-
5 pated in that transfer in that situation?

6 A. So long as it complied with State and
7 Federal law, yes.

8 Q. Did that ever occur before PICA went into
9 effect at Piasa?

10 A. As I answered before, we've never transfer-
11 red ownership of a firearm with a revolving -- a
12 shotgun with revolving cylinder like a Street
13 Sweeper.

14 Q. Thank you.

15 Looking again at Exhibit 3, I want to
16 direct your attention to Interrogatory No. 5, which
17 asks Piasa to identify -- for each year from 2020
18 through 2023, identify what proportion of the total
19 firearms you sold were firearms of the types
20 regulated by PICA. Do you see that?

21 A. I do.

22 Q. Piasa's response stated "Responding Party
23 estimates the total was approximately 20-40% of its
24 business."

1 Did I read that correctly?

2 A. Yes.

3 Q. In this response, 20-40% of its business,
4 does that phrase refer to the proportion of firearms
5 sold, or to something else?

6 A. That would refer to the total number of
7 firearms sold or transferred.

8 Q. So when you say "20-40% of its business,"
9 that refers to 20-40% of all firearms sold or
10 transferred, rather than 20-40% of Piasa's revenues,
11 for example?

12 A. Correct.

13 Q. How did you generate the 20-40% estimate?

14 A. Through my experience with the firearms --
15 with this firearms business and with our transfers,
16 sales, and the paperwork that we complete.

17 Q. Which documents did you look at to generate
18 that estimate?

19 A. Form 4473 from ATF.

20 Q. What information on Form 4473 helped you
21 generate the 20-40% estimate?

22 A. The items on that -- on the Form 4473 are
23 each firearm that's transferred, each owner -- each
24 firearm that's transferred ownership of.

1 Q. Does Form 4473 list every firearm that
2 Piasa Armory transferred within that time period?

3 A. Every firearm that was transferred to a
4 nonlicensed individual, Form 4473 is used.

5 Q. Is there a separate Form 4473 for each such
6 firearm?

7 A. That's at the discretion of each dealer.
8 We can put as many firearms on each form as we would
9 like.

10 We choose to -- to use that style of
11 recordkeeping, rather than doing one form for each
12 individual firearm.

13 Q. I'd like to understand a little better how
14 this information is documented; so am I right that
15 on this ATF Form 4473, Piasa lists out all of the
16 firearms that Piasa transferred to nonlicensed
17 individuals and nonlicensed -- that means they're not
18 licensed as firearm dealers, correct?

19 A. Correct.

20 Q. Is there a single Form 4473 that lists
21 every firearm that Piasa transferred to those
22 individuals within the time period of 2020 to 2023?

23 A. Can you clarify that?

24 Q. I guess I'm just asking, how is it broken

1 out? How many firearms might be listed on one form?

2 A. That is case by case, dependent on each
3 purchaser. There's no restriction to the number of
4 firearms purchased by each individual.

5 Q. Does Piasa complete one form for each
6 firearm transaction?

7 A. Transaction, yes, not per firearm.

8 Q. Understood.

9 So for the period from 2020 through 2023,
10 how many copies of the Form 4473 did Piasa Armory
11 create?

12 A. What was the period again?

13 Q. From 2020 through 2023.

14 A. We complete approximately 2500 to 3200
15 forms a year.

16 Q. That would -- for this period of a
17 four-year span would generate, at least on that
18 estimate, around a thousand copies of Form 4473,
19 right?

20 A. No, sir, that'd be 2500 to 3400; each form,
21 not each firearm.

22 Q. So each year, there are 2500 to 3200 forms?

23 A. Yes, sir.

24 Q. So over a four-year span, you can expect

1 there to be at least a thousand forms, right?

2 I'm sorry; scratch that.

3 Over a four-year period, you would expect
4 there to be at least 10,000 forms, correct?

5 A. Yes.

6 Q. Did you review all of those forms when you
7 were generating the 20-40% estimate?

8 A. I've reviewed each and every one of those
9 forms after their completion.

10 Q. Did you examine -- in preparing your
11 answers to Interrogatory No. 5, did you examine those
12 records to count the proportion of those firearms
13 that were firearms of the type regulated by PICA?

14 A. I did not go back and count every single
15 form; however, through my experience in completing
16 those forms is what I used to generate that number.

17 Q. Would it be fair to say that you were
18 estimating it based on your memory of having filled
19 out that documentation in the past?

20 A. Yes.

21 Q. But Piasa does not keep a comprehensive
22 list of every firearm that is sold that is a firearm
23 of the type regulated by PICA, does it?

24 A. We keep a comprehensive list of every

1 firearm that has been brought in for transfer, sale,
2 or gunsmith work since we've opened for business.

3 Q. Do those records specifically state whether
4 each such firearm is a firearm of the type regulated
5 by PICA?

6 A. Those records state make, model, caliber,
7 serial number, and type.

8 Q. One could, by reviewing each of those
9 weapons, determine whether it is a firearm of the
10 type regulated by PICA; is that fair to say?

11 A. Yes.

12 MR. BRADY: Objection, calls for specu-
13 lation.

14 BY MR. HAZINSKI:

15 Q. The data is not stored in a format that
16 allows you to immediately determine, in summary form,
17 what proportion of the firearms are firearms of the
18 type regulated by PICA, correct?

19 A. Correct.

20 MR. HAZINSKI: I'm going to show you
21 another exhibit now. I believe we're up to Exhibit
22 5.

23 (Exhibit 5 marked.)

24 BY MR. HAZINSKI:

1 Q. Mr. Pulaski, are you able to see this
2 document?

3 A. I am.

4 Q. Do you recognize it?

5 A. It looks like a supplemental response to
6 the interrogatories, yes.

7 Q. Have you seen this before?

8 A. I can't recall if I've seen this particular
9 document before.

10 Q. I'll scroll down to page 9.

11 This is a Verification form, correct?

12 A. Yes.

13 Q. This Verification states under oath that to
14 the best of your knowledge, the foregoing answers are
15 true and correct; is that right?

16 A. Yes.

17 Q. Did you sign this?

18 A. I did.

19 Q. Before you signed this Verification, did
20 you review all of the supplemental interrogatory
21 responses to make sure that they were correct?

22 A. I reviewed the prior supplemental document
23 that you provided, I think Exhibit 3, and any -- any
24 relevant changes that were made to this one, but I

1 did not notice any.

2 Q. Okay. Fair to say that you -- you separ-
3 ately reviewed the initial interrogatory responses,
4 but did not separately review all of the supplemental
5 responses; is that right?

6 MR. BRADY: Objection, misstates testi-
7 mony.

8 MR. HAZINSKI: You can answer.

9 THE WITNESS: I reviewed both documents;
10 this one, as well.

11 BY MR. HAZINSKI:

12 Q. Did you review this one -- Strike that.

13 Just to be clear, because I think the
14 testimony is not yet clear -- have you seen this
15 document before?

16 A. Like I said before, I -- I don't recall
17 each specific document.

18 This one, I have seen before, but I have
19 seen many documents in relation to this case. Not
20 being an attorney, they don't stand out as -- as
21 separate from each other every time.

22 Q. Well, let's focus specifically on the
23 amended -- or I should say supplemental response to
24 Interrogatory No. 2.

1 Are you able to see that on the screen?

2 A. I am.

3 Q. This is an interrogatory asking to identify
4 each item regulated by PICA for which you contend the
5 Act's regulations violated the Second Amendment, and
6 I'll scroll down to page 4 of this document.

7 Do you see that the response identifies
8 in lettered paragraphs, certain categories of
9 firearms?

10 A. I do.

11 Q. Do you recall reviewing this answer?

12 A. I do.

13 Q. Did you review this answer before you
14 signed the Verification on page 9?

15 A. I did.

16 Q. Okay. So this response identifies 11
17 categories of items for which you contend that PICA's
18 regulations violate the Second Amendment, correct?

19 A. Yes.

20 Q. Each category, as I mentioned, corresponds
21 to a letter a through k, right?

22 A. Yes.

23 Q. So I'd like to ask you about each of these
24 categories, and how they figure into Piasa's

1 business.

2 Starting with a, which is semiautomatic
3 rifles that accept detachable magazines and have at
4 least one of the listed features, about how many
5 firearms in that category would you estimate Piasa
6 Armory has sold since 2020?

7 A. I would estimate, oh, several hundred each
8 year. Between sales and transfers, somewhere in the
9 500 to 800 firearm range each year.

10 Q. How many would that be in a typical month?

11 A. I said each year we sell or transfer some-
12 where around 4,000 firearms, so that divided equally
13 between the months -- sorry, I need a calculator to
14 do that math.

15 Q. Just to clarify, when you said "4,000
16 firearms," that's 4,000 total firearms, not limited
17 to firearms in this category we're talking about,
18 right?

19 A. Correct.

20 Q. Okay. Focusing specifically on the semi-
21 automatic rifles that accept detachable magazines and
22 have at least one of these listed features, based on
23 your estimate, would you say that Piasa typically
24 transfers more or less than 100 such firearms per

1 month?

2 A. I would estimate over 100 per month.

3 Q. Subparagraph b in the interrogatory re-
4 sponse refers to SKS rifles with a detachable
5 magazine. Do you see that?

6 A. I do.

7 Q. What is an SKS rifle?

8 A. It is a Russian small arm.

9 Q. How many SKS rifles with detachable maga-
10 zines would you estimate Piasa has sold since 2020?

11 A. I would have to review specific records for
12 that, but very few.

13 Q. About how many is very few?

14 A. Oh, somewhere in the 10 to 15 firearms
15 range.

16 Q. Subparagraph c refers to semiautomatic
17 rifles with a fixed magazine above ten rounds. Do
18 you see that?

19 A. I do.

20 Q. How many such firearms would you estimate
21 Piasa has sold since 2020?

22 A. I could not put an estimate to that. Those
23 firearms don't have as much of a desire in this
24 state, due to no regulation on magazine capacity,

1 like they would in other states.

2 Q. Can you explain that answer for me?

3 A. Some states have a restriction on the
4 number of rounds allowed in the magazine on a firearm
5 and require it to be a fixed capacity.

6 Illinois, before PICA, did not have that
7 restriction.

8 Q. Since 2020, would you estimate that Piasa
9 has sold fewer than ten semiautomatic rifles with a
10 magazine above -- a fixed magazine above ten rounds?

11 A. I couldn't put an honest estimate on it.

12 Q. Based on your experience, would you
13 estimate that it's more or less than the number of
14 SKS rifles with detachable magazines that Piasa sold?

15 A. I presume it was less.

16 Q. D refers to semiautomatic pistols that
17 accept detachable magazines and have at least one of
18 the listed features.

19 I'll ask the same question again, and I
20 apologize if it's getting tedious: About how many
21 semiautomatic pistols with detachable magazines that
22 have one or more of those features would you estimate
23 Piasa has sold since 2020?

24 A. Again, I would lump that number in with the

1 earlier number of approximately 20%, 20-40% of our
2 firearm transfers and sales.

3 Q. As an absolute number, how many would that
4 be?

5 A. Somewhere between 600 to 800 a year.

6 Q. Would you estimate that Piasa annually
7 sells more of the firearms in the category reflected
8 in paragraph d than rifles in the category of fire-
9 arms in paragraph a?

10 A. I would presume a fairly even split between
11 paragraphs a and d.

12 Q. Subparagraph e refers to semiautomatic
13 pistols with a fixed magazine above 15 rounds.

14 How many such firearms would you estimate
15 Piasa has sold since 2020?

16 A. Of category e, I don't have a recollection
17 of any firearms since 2020.

18 Q. Subparagraph f refers to semiautomatic
19 shotguns that have one of five -- at least one of
20 five listed features.

21 How many firearms in this category would
22 you estimate Piasa has sold since 2020?

23 A. I would estimate 20 to 50 per year.

24 Q. Paragraph g refers to semiautomatic shot-

1 guns with a fixed magazine above five rounds.

2 About how many such firearms would you
3 estimate Piasa has sold since 2020?

4 A. Similar with the above, 20 to 50 per year.

5 Q. Are the -- so about 20 to 50 firearms in
6 the category of subparagraph f, and 20 to 50 in
7 category subparagraph g -- are those overlapping to
8 any extent?

9 A. They do, yes.

10 Q. Do they overlap entirely?

11 A. Not entirely, no.

12 Q. About how much overlap would you estimate
13 there is?

14 A. I would say somewhere around 70% of that
15 number is an overlap.

16 Q. Thank you.

17 Subparagraphs h and i refer to rifles
18 chambered for .50 BMG ammunition and .50 BMG ammu-
19 nition. Do you see that?

20 A. I do.

21 Q. How many rifles chambered for 50 caliber
22 BMG ammunition would you estimate Piasa has sold
23 since 2020?

24 A. I'd have to review our data for that, but I

1 believe we sell or transfer one every year to every
2 other year.

3 Q. Can you estimate how much 50 caliber BMG
4 ammunition Piasa has sold since 2020?

5 A. We tend to sell approximately a box of six
6 to eight months, a box of ten rounds.

7 Q. Fair to say, it's not a big part of Piasa's
8 business?

9 A. We have a unique situation where we are
10 located with not a suitable shooting range for that
11 type of ammunition.

12 Q. Can you explain what you mean by that?

13 A. Yes. 50 caliber ammunition is not normally
14 used on pistol length ranges of 15 to 25 yards. We
15 don't have any ranges that are publicly accessible
16 that are longer than that in the immediate area of
17 Illinois.

18 Q. Why is 50 caliber ammunition not used on
19 ranges of that size?

20 A. It's expensive, and usually used for longer
21 range target practice.

22 Q. So the use case for 50 caliber ammunition
23 is different enough from the use case for most pistol
24 ammunition that aren't used on the same shooting

1 ranges?

2 MR. BRADY: Objection, misstates testi-
3 mony, and vague as to -- I'm sorry, Mr. Hazinski, I
4 didn't understand the term you were using, the use
5 case.

6 MR. HAZINSKI: Yeah, Mr. Pulaski, do you
7 understand what I mean when I say use case?

8 THE WITNESS: I don't.

9 Can you clarify?

10 MR. HAZINSKI: Yeah. Let me ask it
11 another way.

12 The 50 caliber ammunition is better
13 suited for long-range shooting than for the shooting
14 that is typically done with common pistol ammunition,
15 and that's why they use different shooting ranges
16 typically; is that -- is that a fair summary of your
17 testimony?

18 THE WITNESS: That's a fair summary.

19 BY MR. HAZINSKI:

20 Q. Subparagraph j is semiautomatic firearms
21 that have the capacity to accept a belt ammunition
22 feeding device. Do you see that?

23 A. I do.

24 Q. What is a belt ammunition feeding device?

1 A. A belt ammunition feeding device is either
2 a cloth or metal belt or a series of links that
3 attach ammunition to each other that are fed in
4 through a firearm.

5 Q. Approximately how many semiautomatic rifles
6 are cable -- Scratch that.

7 Approximately how many semiautomatic
8 firearms that have the capacity to accept a belt
9 ammunition feeding device would you estimate Piasa
10 has sold since 2020?

11 A. I believe we've transferred ownership of
12 two of those.

13 Q. Is it fair to say that such firearms are
14 not a major part of Piasa's business?

15 A. Assisting with transfer is a major part of
16 our business, and whichever customer would like to
17 make that happen, then that's what we do, but they
18 aren't a major revenue generator for our business.

19 Q. Subparagraph k refers to a list of firearm
20 parts that may bring a firearm into PICA's definition
21 of an assault weapon, correct?

22 A. Correct.

23 Q. Can you estimate about how many of these
24 firearms Piasa has sold since 2020?

1 A. I would not be able to estimate that
2 without reviewing our data.

3 Q. Which data would you need to review?

4 A. Our sales records from our point of sale.

5 We do normally keep those items in stock
6 for sale, however.

7 Q. What -- what would be required to count
8 the number of items of the type listed in subpara-
9 graph k that Piasa has sold or transferred since
10 2020?

11 A. We would need to pull reports from our
12 point of sale systems.

13 Q. Can you explain what those reports are?

14 A. Sure. That would be individual reports of
15 each item sold for a given period of time.

16 Q. Are they similar to sales receipts?

17 A. Yes, but they would be lumped into a
18 category.

19 Q. The last paragraph of this interrogatory
20 response states "Responding Party does not challenge
21 PICA's restrictions as to grenade launchers or
22 shotguns with a revolving cylinder that do not meet
23 an exemption under PICA's definition of assault
24 weapon." Do you see that?

1 A. I do.

2 Q. In what way do grenade launchers differ
3 from the items that Piasa contends are protected by
4 the Second Amendment?

5 MR. BRADY: Objection, vague. Objection
6 to the extent it calls for a legal conclusion.

7 MR. HAZINSKI: Yeah, let me rephrase it.

8 In what respects do grenade launchers
9 differ from the categories of items listed in sub-
10 paragraphs a through k of this interrogatory re-
11 sponse?

12 MR. BRADY: Objection, vague as to
13 differ.

14 To the extent it's calling for a legal
15 conclusion, objection.

16 MR. HAZINSKI: You can answer.

17 THE WITNESS: I mean, a grenade launcher
18 is not a traditional firearm that is purchased by our
19 customers.

20 BY MR. HAZINSKI:

21 Q. What do you mean when you say "a tradi-
22 tional firearm"?

23 A. Typically a traditional firearm would be a
24 pistol, rifle, or shotgun. These are also much more

1 highly regulated by the Federal Government, and many
2 of -- many customers are under the belief that they
3 were not legally allowed in Illinois, to begin with,
4 and don't tend to seek that item because of that.

5 Q. What difference -- Strike that.

6 What differentiates a shotgun with a
7 revolving cylinder from other types of shotguns?

8 A. The revolving cylinder.

9 Q. Can you explain what that means?

10 A. Typically the revolving cylinder is a
11 built-in magazine that rotates and feeds higher
12 capacity than a typical shotgun.

13 Q. In what ways are revolving cylinder shot-
14 guns different from the items listed in subparagraphs
15 a through k of this interrogatory response?

16 MR. BRADY: Objection, vague as to dif-
17 ferent, and objection to the extent it calls for a
18 legal conclusion.

19 THE WITNESS: Revolving cylinder shotgun
20 has regulation through the ATF as an item that must
21 be covered under the NFA.

22 BY MR. HAZINSKI:

23 Q. I want to go down to supplemental response
24 to Interrogatory No. 7, which is on page 7 of Exhibit

1 5. This is an interrogatory that asks that you
2 describe with specificity all ways in which you
3 contend you have been injured or will be injured by
4 the enactment and/or enforcement of PICA. Do you see
5 that?

6 A. I do.

7 Q. I'd like to ask you about one part of the
8 response; I can highlight it.

9 Starting here, "Prior to PICA taking
10 effect, Responding Party had sold items falling
11 within most, if not all, of those firearm,
12 ammunition, and part categories." Do you see that?

13 A. Yes.

14 Q. It refers partly to the supplemental
15 response to Interrogatory No. 3, correct?

16 A. Yes.

17 Q. Your answer states that Piasa may not have
18 sold items in all of those categories, right?

19 A. Correct.

20 Q. We just walked through them, but which
21 categories would that refer to?

22 A. Without reviewing individual categories
23 again, from immediate recollection, it's revolving
24 cylinder shotguns.

1 Q. Would it include semiautomatic pistols with
2 fixed magazines above 15 rounds?

3 A. Yes.

4 Q. Piasa has, for example, transferred a
5 grenade launcher within the past five years, right?

6 A. I would need to refer to our records to
7 see when; but, yes, we have transferred a grenade
8 launcher.

9 Q. Okay. Later on in the answer it states,
10 "Some of those items are among the most popular
11 firearms and parts in the country." Do you see that?

12 A. Yes.

13 Q. Which items are you referring to that are
14 the most popular firearms and parts in the country?

15 A. Items such as AR-15s, AK-47s, pistols with
16 threaded barrels, copies in variance of each of
17 those.

18 Q. Other than AR-15, AK-47s, and pistols with
19 threaded barrels, and copies in variance of those
20 items, are there other items included in your
21 reference to most popular firearms and parts in the
22 country?

23 A. Certainly many firearms in those categories
24 would be covered under that.

1 Q. Any firearms not in those categories?

2 A. I would have to look at an exhaustive list
3 of all the firearms that are popular in the country.

4 Q. Are 50 caliber rifles among the most
5 popular firearms in the country?

6 A. They are not as common as other items on
7 the list, but they are a popular item.

8 Q. Does the phrase, most popular firearms and
9 parts in the country, as used in this interrogatory
10 response, include centerfire 50 caliber rifles?

11 A. No.

12 Q. Does that phrase, as used in this inter-
13 rogatory response, include semiautomatic firearms
14 that are capable of accepting a belt ammunition
15 feeding device?

16 A. No.

17 Q. What information did you rely on to deter-
18 mine which are the most popular firearms and parts in
19 the country, in preparing this interrogatory
20 response?

21 A. Both our -- our sales data, our transfer
22 and sales information, along with information from
23 our national trade organization, the NSSF, National
24 Shooting Sports Foundation.

1 Q. Did you specifically review any Piasa sales
2 documents or transfer documents in determining which
3 items are among the most popular, to prepare this
4 interrogatory response?

5 A. Again, my knowledge of those documents from
6 completing paperwork with our company gives me that
7 background knowledge.

8 Q. Fair to say, you didn't specifically look
9 at those documents again, or analyze them again, in
10 order to arrive at this conclusion, correct?

11 A. Correct.

12 Q. Further down, do you see where it says "The
13 inability to offer those items to its customers,
14 due to PICA, has caused Responding Party to lose a
15 significant amount of revenue"? Did I read that
16 correctly?

17 A. Yes.

18 Q. How much revenue do you contend Piasa has
19 lost due to PICA?

20 A. It would be difficult for me to prove a
21 negative; however, again, we estimate 20-40%, and
22 unknown additional, because of customers who are
23 afraid to use our other services due to PICA.

24 Q. What documents support your conclusion that

1 Piasa lost 20-40% of its revenue?

2 MR. BRADY: Objection, misstates testi-
3 mony.

4 MR. HAZINSKI: You can answer.

5 THE WITNESS: Again, we don't have an
6 ability to prove a negative.

7 BY MR. HAZINSKI:

8 Q. Are there any documents that you can point
9 to that would show that Piasa had lost 20-40% of its
10 business?

11 MR. BRADY: Objection, misstates testi-
12 mony.

13 MR. HAZINSKI: You can answer.

14 THE WITNESS: Okay. Again, it's -- it's
15 impossible to prove a negative, but I can say that
16 we have many customers who would like to purchase, or
17 who have purchased and transferred, but are unable to
18 receive those items, along with customers who are
19 unwilling to bring already owned items in for either
20 service or use through our facility.

21 BY MR. HAZINSKI:

22 Q. After PICA went into effect, did Piasa
23 conduct any audit or financial analysis to determine
24 the specific dollar amount of any lost revenue?

1 A. We did not.

2 Q. You gave a deposition in the Langley case,
3 which is one of the consolidated cases in the
4 Southern District, correct?

5 A. Correct.

6 Q. That was in October of 2020?

7 A. I don't recall the specific date or time,
8 but that sounds about -- You said 2020?

9 Q. I'm sorry. That's what I have written in
10 my notes, but that's clearly incorrect.

11 I believe it was in October of 2023.

12 A. That's closer to what I recall.

13 Q. Thank you for catching that.

14 Do you recall testifying that you esti-
15 mated that PICA had caused Piasa to lose about 50% of
16 its revenue?

17 A. I don't recall that number, no.

18 MR. HAZINSKI: Okay. I'll show you what
19 I think will now be Exhibit 6. We'll mark this as
20 Exhibit 6.

21 (Exhibit 6 marked.)

22 BY MR. HAZINSKI:

23 Q. Mr. Pulaski, are you able to see this
24 deposition?

1 A. The lettering is a little small, but, yes.

2 Q. I'll zoom in a bit. Hopefully that will
3 help.

4 Do you recognize this as the -- the
5 transcript of deposition you gave in October of last
6 year?

7 A. I'm not familiar with deposition tran-
8 scripts, but I'll presume that that's what it is.

9 Q. Fair enough.

10 I'll show you -- on this transcript it's
11 page 18, starting at line 7.

12 Do you see where it says "What financial
13 impact has PICA had on your business at Piasa
14 Armory?" Do you see that?

15 A. Yes.

16 Q. You answered, "We estimate approximately 50
17 percent loss of revenue," correct?

18 A. Yes --

19 Q. Did you give that answer --

20 A. -- correct.

21 Q. Did you give that answer at that time?

22 A. That's my testimony.

23 Q. Do you believe that estimate is accurate,
24 as you sit here today?

1 A. No. We revise our estimates of our
2 business operations on an ongoing basis.

3 Q. At that -- at the time you gave this
4 testimony, what led you to believe that you -- that
5 Piasa was experiencing a 50% loss of revenue?

6 A. It was based on our experience with our
7 customers and our sales.

8 Q. Your testimony today is that the loss of
9 revenue might actually be closer to 20%; is that
10 fair?

11 A. Correct.

12 MR. BRADY: Objection, misstates testi-
13 mony.

14 MR. HAZINSKI: All right. I realize
15 we've been going for about an hour and 15 minutes.
16 If the witness or anybody else would like to take a
17 break, we could break for maybe five minutes and come
18 back at 11:20.

19 THE COURT REPORTER: Thank you.

20 MR. HAZINSKI: All right. See you soon.

21 (Recess taken.)

22 MR. HAZINSKI: Mr. Pulaski, I'm going to
23 show you another document, and I believe will be
24 Exhibit 7.

1 (Exhibit 7 marked.)

2 BY MR. HAZINSKI:

3 Q. Mr. Pulaski, do you see this document
4 called ATF Bound Book?

5 A. I do.

6 Q. For the record, this is a document produced
7 with a Bates stamps Piasa 466 through 1706.

8 Do you recognize this document?

9 A. Yes.

10 Q. What is it?

11 A. This is our ATF required recordkeeping
12 called the Bound Book.

13 Q. This document contains -- the Bound Book
14 contains records of all of Piasa's firearm acquisi-
15 tions and dispositions, correct?

16 A. Correct.

17 Q. Can you define the term acquisition, for
18 purposes of this document?

19 A. Yes. Acquisition means taking into inven-
20 tory for transfer, gunsmith work, or other holding,
21 for gunsmith work. It would be periods overnight.

22 For transfers or other holding, it would
23 be any acquisition.

24 Q. Can you define disposition, for the

1 purposes of this document?

2 A. Yes. Disposition would be returning a -- a
3 firearm to the original owner or transfer to other
4 licensed individual or to an unlicensed individual.

5 Q. When you say "returning to the original
6 owner," does that refer specifically to the context
7 of gunsmithing services?

8 A. Yes.

9 Q. I'll scroll down to the second page so we
10 can see the data; and this is Piasa 467.

11 Does each row in this list correspond to
12 one firearm or to one transaction?

13 A. Each row is one firearm.

14 Q. Okay. And these records are organized
15 chronologically by the date of acquisition, correct?

16 A. Correct.

17 Q. These records generally start in January
18 2021 and go through April -- midway through April of
19 2024, correct?

20 A. Correct.

21 Q. You referred to the ATF earlier.

22 Is Piasa legally required to maintain
23 these records?

24 A. We are.

1 Q. Is documenting firearm acquisitions and
2 dispositions a regular part of Piasa's business
3 practice?

4 A. Yes.

5 Q. Where are these records maintained?

6 A. These records are maintained -- this
7 particular set of records is maintained digitally via
8 a company called FastBound, you see referenced on the
9 bottom of that page. They store those in the Cloud
10 with their -- their servers, and then we also back
11 those up locally.

12 Q. When did Piasa start using FastBound?

13 A. It looks like in -- we began evaluating in
14 2023, but began earnest use in 2021 -- I'm sorry,
15 excuse me.

16 End of 2020, we began evaluating, and
17 January of 2021 we began using.

18 Q. I see.

19 Does this document contain all of the
20 Piasa acquisition and disposition records that exist
21 in FastBound, at least up to the point that they were
22 produced to us?

23 A. Yes.

24 Q. Did you generate this document using the

1 FastBound platform?

2 A. Yes.

3 Q. Just to clarify, you printed all of the
4 acquisition and disposition records that existed in
5 FastBound, rather than filtering them or using any
6 criteria to narrow the data, right?

7 A. Correct, not printed by provided electron-
8 ically.

9 Q. I use printed a little loosely there.
10 I suppose I meant printed to PDF, or
11 something like that, but thank you for the
12 clarification.

13 The first entry here has an acquisition
14 date, it looks like of October 2020, correct?

15 A. Yes.

16 Q. It has your name listed, Eric Scott
17 Pulaski, in the column name and address of non-
18 licensee, correct?

19 A. Correct.

20 Q. Was this from the period of time where you
21 were testing out the system and beginning to
22 implement it?

23 A. Yes.

24 Q. Okay. So the fact that your name is listed

1 under name and address of nonlicensee with respect to
2 that first entry, what does that mean?

3 A. That means that that firearm was personally
4 owned by me.

5 Because we are an LLC, not a sole
6 proprietor, the business owns any firearms owned by
7 the business, and I own personally firearms by
8 myself.

9 Q. Does this row reflect that you transferred
10 a firearm from your personal possession into the
11 possession of the business?

12 A. Correct.

13 Q. Okay. So is it fair to say that the
14 information in the column labeled Name and address of
15 nonlicensee; or if licensee, name and license No. (If
16 acquired), the information in that column essentially
17 says where the firearm came from?

18 A. Correct.

19 Q. Who enters acquisition and disposition data
20 into FastBound?

21 A. That data is entered by myself and our
22 sales staff.

23 Q. Is the data entered into FastBound by Piasa
24 employees that have knowledge, personally, of each

1 acquisition and disposition?

2 A. Yes.

3 Q. How long after each firearm acquisition
4 does Piasa wait to enter that information?

5 A. That information is entered immediately
6 into the FastBound system.

7 Q. How long after each firearm disposition
8 does Piasa wait to enter the information into
9 FastBound?

10 A. Firearms are disposed when the 4473 Form
11 is completed or compliant with the State regulations,
12 which I believe is 24 hours.

13 Q. So are you saying that the disposition
14 information is entered into FastBound typically
15 within 24 hours after each disposition?

16 A. Correct.

17 Q. The first column in the Bound Book is
18 labeled Importer, manufacturer, and/or "privately
19 made firearm." Do you see that?

20 A. Yes.

21 Q. What type of information gets logged into
22 this column?

23 A. The information about who made or -- and/or
24 imported those firearms.

1 Q. The second column is called Type. Do you
2 see that?

3 A. Yes.

4 Q. What type of information is logged in the
5 Type column?

6 A. Those would be the type defined by the ATF.

7 Q. The types listed in this document are
8 rifle, pistol, revolver, shotgun, receiver, and
9 frame; is that correct?

10 A. We also have other and pistol grip --
11 excuse me, pistol grip firearm, and compliant with
12 Illinois rules, black powder.

13 Q. I'd like to ask you about some of those
14 terms.

15 Can you -- can you explain what a
16 receiver is?

17 A. The receiver is the part of the firearm
18 that would hold many of the functional components,
19 most commonly the AR-15 lower receiver.

20 Q. What types of firearms have receivers?

21 A. Every firearm has a receiver. That's what
22 holds the action components that make the firearm
23 function.

24 Q. Fair to say that the firearm listed as a

1 receiver is not necessarily an AR platform rifle, for
2 example?

3 A. Correct.

4 Q. What is a frame?

5 A. A frame is similar to a receiver, but
6 typically refers to pistol specific firearms.

7 Q. So are you saying that a receiver
8 generally -- Strike that.

9 Are you saying that the term frame, in
10 the Type column in the Bound Book, generally refers
11 to pistols, whereas the term receiver generally
12 refers to other types of firearms?

13 A. Typically, yes.

14 Q. Okay. Does the Bound Book contain listings
15 for any -- Strike that.

16 Is it ever the case that a pistol is
17 referred to in the Bound Book with the type listed as
18 receiver?

19 A. It's possible, but not common.

20 Q. If the type is listed as receiver, does
21 that necessarily mean that the firearm is a rifle?

22 A. Again, just like with the pistols, it's
23 typically referring to a rifle or a shotgun, but that
24 depends on how the ATF or the manufacturer classifies

1 it.

2 Q. It's possible that a firearm listed as --
3 Strike that.

4 The third column is called Model. Do you
5 see that?

6 A. I do.

7 Q. What information is logged in that column?

8 A. That's the information provided by the
9 manufacturer; or if none is provided by the manufac-
10 turer, our best knowledge of what that firearm's
11 model name is.

12 Q. The fourth column is Caliber or gauge,
13 correct?

14 A. Correct.

15 Q. What information is logged in that column?

16 A. That's the caliber or gauge, if known, for
17 rifles, shotguns, pistols, frames, all the -- all the
18 types, either as indicated by the manufacturer or by
19 the capabilities of the firearm.

20 Q. That refers to the caliber or gauge of the
21 projectile that the listed firearm is capable of
22 shooting, correct?

23 A. Typically, yes.

24 Q. Why do you say typically?

1 A. There are times when that caliber gauge is
2 not known, or when they're capable of using multiple
3 calibers or gauges.

4 Specifically that third line down, the
5 Ruger SP101, is listed as .357 Magnum, but it's
6 capable of also shooting another caliber.

7 Q. What other caliber can it shoot?

8 A. That one is three .38 Special.

9 Q. Okay. Can you explain what the term multi
10 in this column refers to?

11 A. Yes. Those last two entries, the Anderson
12 and ABC Rifle Companies, those are specifically AR-15
13 style receivers, and because they don't have any
14 functional parts or any labeling by the manufacturer
15 for what caliber they're intended for, they can be
16 built into any of several dozen different calibers.

17 Q. Are all of the firearms with a caliber or
18 gauge listed as multi AR-15 style receivers?

19 A. No.

20 Q. What other kinds of firearms or receivers
21 can have a caliber or gauge listed as multi?

22 A. Frames or other receivers for other
23 firearms, most commonly Glock style copies and
24 clones, are commonly listed as multi.

1 Q. I want to ask you another terminology
2 question.

3 I'll scroll now to page Piasa 713, is
4 what I'm looking for.

5 Do you see the fifth row of this page, it
6 identifies a rifle and the caliber and gauge is
7 listed as 50BMG?

8 A. Yes.

9 Q. What does 50BMG refer to?

10 A. That's 50 caliber BMG.

11 Q. Does Piasa use any abbreviations in its
12 Bound Book other than 50BMG to identify firearms
13 capable of shooting 50 caliber cartridges?

14 A. Yes. We use the standard abbreviations for
15 the industry for any other 50 caliber or similar
16 ammunition. Just like above is 12GA, it's an
17 abbreviation for gauge.

18 Q. Well, maybe my question was unclear.

19 So the 50BMG entry in the Caliber or
20 gauge column identifies that entry as a 50 caliber
21 rifle, correct?

22 A. As that particular chambering of a 50
23 caliber rifle, yes.

24 Q. Are there any other abbreviations for 50BMG

1 that Piasa uses to identify 50 caliber rifles in
2 these records?

3 MR. BRADY: Objection, vague as to 50
4 caliber rifles.

5 MR. HAZINSKI: Do you understand what I'm
6 asking?

7 THE WITNESS: I presume you mean the
8 50BMG cartridge?

9 MR. HAZINSKI: Right.

10 THE WITNESS: 50 caliber rifles can
11 encompass many other cartridges.

12 BY MR. HAZINSKI:

13 Q. If Piasa acquires or disposes of a rifle
14 that is chambered for 50 caliber BMG ammunition, is
15 it always indicated in the Bound Book, the term
16 50BMG?

17 A. Our Bound Book allows us to enter different
18 caliber names or new caliber names that aren't in-
19 cluded with the software originally, so every entry
20 will have -- that refers to 50 caliber BMG will have
21 some variation of that entry that you see on the
22 McMillan rifle line. It may include a period at the
23 beginning, it may have a space between 50 and BMG, or
24 it may have periods in between each letter of BMG,

1 but some variation of 5-0 and BMG would be included,
2 yes.

3 Q. Understood. Thank you.

4 I'll go back to the second page of this
5 document, and just ask about the seventh column,
6 which says Date of import, manufacturer, or
7 acquisition. Do you see that?

8 A. I do.

9 Q. So does this refer to the date on which
10 Piasa took the listed firearm in its inventory?

11 A. Yes.

12 Q. Okay. The ninth column says Date of
13 disposition.

14 Does this refer to the date on which the
15 firearm was returned or sold or transferred?

16 A. It refers to the date that it was returned
17 to the owner or transferred to the owner.

18 Date of sale can be different from date
19 of disposition.

20 Q. I see.

21 So you might have a date of sale that's
22 earlier, and then an actual date of transfer several
23 days or weeks later, and the date of transfer is what
24 would be reflected in that column, correct?

1 A. Correct.

2 Q. The tenth column on this sheet is called
3 Name.

4 What type of information is logged in
5 this column?

6 A. That would typically have the name of the
7 nonlicensee or licensee acquiring that firearm.

8 Q. Could the Name category include both
9 individuals and organizations?

10 A. Yes.

11 Q. Okay. Would the data in the Name column
12 enable you to tell how many firearms Piasa had
13 returned or transferred to a particular individual
14 or organization?

15 A. Yes.

16 Q. Do the acquisition and disposition records
17 distinguish in any way between firearms that were
18 transferred versus ones which were acquired for
19 gunsmithing services?

20 A. This version of our Bound Books does not;
21 however, the records kept by FastBound do.

22 Q. Is it possible for Piasa to generate a
23 version of these records that indicates whether each
24 firearm was acquired for gunsmithing services?

1 A. Yes, that's possible.

2 Q. Looking at this version of the document,
3 there's no way to tell, for any given firearm,
4 whether there was a transfer to a new owner, correct?

5 A. Someone not familiar with the business
6 would have no way to know --

7 Q. Do you --

8 A. -- other than -- pardon me -- other than
9 the acquisition name.

10 For example, we typically don't receive
11 firearms from companies for gunsmith work; those are
12 typically transfers.

13 Q. Understood.

14 The last column on this sheet is called
15 Notes. Do you see that?

16 A. Yes.

17 Q. What type of information is recorded in
18 that column?

19 A. That's a column required by ATF for any
20 errors or additions or amendments to any of those
21 line entries.

22 Q. Can you give me an example?

23 A. If the serial number was incorrectly
24 recorded, then we can change that serial number in

1 our permanent record books; however, we must keep
2 track of -- excuse me, an audit trail of every change
3 made.

4 Q. Does Piasa enter any information into the
5 Notes column other than records of when it corrected
6 errors in the data?

7 A. No.

8 Q. So, for example, the Notes column does not
9 contain any information about Piasa's relationship
10 with the customer, for example?

11 A. Not to my knowledge. FastBound does not
12 include that information in the Notes column.

13 Q. The Notes information, is that entered and
14 typed out manually by Piasa employees who are
15 responsible for updating the acquisition and dispo-
16 sition information?

17 A. Not to my knowledge. That's automatically
18 generated by FastBound.

19 Q. Understood.

20 So there's not -- there's not a narrative
21 box that you have access to; rather, this is automa-
22 tically generated information through the software
23 whenever changes are made to the preexisting data; is
24 that a fair summary?

1 A. To the best of my knowledge, yes.

2 Q. Okay. Do you know how many firearms are
3 listed in the records here in Exhibit 7?

4 A. In the FastBound records, we have approxi-
5 mately 14,000 firearms listed.

6 Q. Can you estimate what proportion of those
7 records are records gunsmithing services?

8 A. Not without reviewing additional data.

9 Q. Would you estimate it's more or less than
10 half?

11 A. Less than half.

12 Q. Would you be comfortable estimating whether
13 it's more or less than 10%?

14 A. I would roughly estimate approximately 300
15 firearms a year for gunsmithing service.

16 Q. Over a four-year time period, that might be
17 about 1,200 firearms for your estimate?

18 A. That's possible.

19 Q. Do you know how many of the firearms listed
20 in these records are firearms of the type regulated
21 by PICA?

22 A. Excuse me. Are you asking if I can tell by
23 simply looking at these records, which are regulated
24 by PICA?

1 Q. Well, as you sit here today, are you able
2 to determine that, just without consulting any addi-
3 tional information?

4 A. Not a comprehensive number. We couldn't go
5 line by line and say yes or no with every single
6 firearm, but I would have a general idea, yes.

7 Q. What would you estimate?

8 A. Again, I'd -- I'd estimate between 20 and
9 40%.

10 Q. Do you know how many of the firearms listed
11 in Exhibit 7 are AR platform rifles?

12 A. I would have to review that data, but just
13 at this screen there are two AR platform receivers
14 listed.

15 Q. Do you know how many of the listed firearms
16 are AK platform rifles?

17 A. Again, I'd need to review that specific
18 data.

19 Our customers typically purchase AR
20 platform rifles, rather than AK platform rifles.

21 Q. Has Piasa acquired or disposed of any
22 firearms since 2021, other than the ones listed in
23 this document?

24 A. Firearms that are brought in for gunsmith

1 services, that don't stay past close of business on
2 the same day -- and are retrieved on the same day by
3 the original person bringing them to us, are not
4 required to be recorded in the Bound Book.

5 Q. Setting aside firearms that Piasa returns
6 to original owners after gunsmithing services, are
7 there any firearms that Piasa has acquired and
8 disposed of since 2021 that are not listed in this
9 document?

10 A. Not that -- no, we're -- we're required to
11 record every acquisition of a firearm other than the
12 exemption for gunsmithing overnight.

13 Q. As you sit here today, do you know how many
14 of the listed firearms in this document are chambered
15 for 50 caliber BMG cartridges?

16 A. Without reviewing every listing, no, but I
17 know there should be at least two.

18 (Mr. Lothson entered the deposition.)

19 BY MR. HAZINSKI:

20 Q. Do you have any reason to believe that it
21 would be more than four?

22 A. I could not speculate that without review-
23 ing this document.

24 Q. This next line of questioning may be

1 obvious, but I have to ask it anyway.

2 The acquisition/disposition records in
3 Exhibit 7 asks for records for only firearms, and not
4 other items, correct?

5 A. Correct. We're not required to keep those
6 records for other items that are not firearms.

7 Q. Piasa doesn't maintain similar acquisition
8 and disposition records for firearm ammunition or
9 magazines, correct?

10 A. Correct.

11 Q. Piasa does not maintain similar acquisition
12 or disposition records for firearm accessories or
13 attachments, correct?

14 MR. BRADY: Objection, vague --

15 THE WITNESS: Correct.

16 MR. BRADY: -- as to accessories and
17 attachments.

18 THE COURT REPORTER: What was the answer?

19 THE WITNESS: My answer is correct, we
20 don't maintain a Bound Book style system for acces-
21 sories, attachments, ammunition.

22 BY MR. HAZINSKI:

23 Q. Okay. Does Piasa maintain any other lists
24 or comprehensive summaries not in the Bound Book

1 format that reflect all sales of firearm, ammunition
2 or magazines?

3 A. The only records we would have would be our
4 point of sale records.

5 Q. Similarly, there is no comprehensive list
6 or summary of Piasa sales of firearm accessories and
7 attachments, other than the individual point of sale
8 records, correct?

9 A. Correct.

10 Q. Suppose that you wanted to determine how
11 many magazines above a certain number of rounds Piasa
12 had sold within a given time period? Could you
13 generate that number by consulting any written
14 records?

15 A. We would need to pull reports from our
16 point of sale, and filter out data that wouldn't be
17 covered under that.

18 Q. What would be involved in obtaining that
19 data from the point of sale records?

20 A. It could be -- It depends on how each line
21 item is entered.

22 Items entered into the Bound Book system
23 are much more heavily regulated than any other item
24 that we sell, so accuracy is extremely important, and

1 we strive greatly to do that.

2 The point of sale documents, we're
3 depending on descriptions provided by manufacturers,
4 which are dependent on that manufacturer providing
5 accurate descriptions, so we would need to manually
6 filter through each item that we've sold and
7 determine if it's under that category or not.

8 Q. When Piasa sells a magazine to a
9 customer -- and here I mean a firearm magazine to a
10 customer -- does the point of sale record typically
11 indicate the capacity of that magazine?

12 A. There's no standard for that. It may or it
13 may not, depending on the manufacturer's description
14 of the item.

15 Q. I see.

16 Does Piasa keep written records about the
17 purpose for which each customer purchases a firearm?

18 A. We're required to by Illinois law, yes.

19 Q. Can you explain more about that require-
20 ment?

21 A. Sure. We're required to keep records of
22 the reason for purchase, the person's occupation, and
23 the purchase price of the firearm for any handgun or
24 concealable firearm.

1 Q. I apologize. Could you repeat the infor-
2 mation you're required to document, its reason for
3 purchase, occupation, and what else?

4 A. Purchase price of the firearm.

5 Q. Purchase price.

6 Where does Piasa document the reason for
7 purchase, the purchaser's occupation, and the pur-
8 chase price?

9 A. We've created a form that complies with the
10 State requirements.

11 Q. Does that form have a name?

12 A. No.

13 Q. Does Piasa create or fill out such a form
14 for every firearm sale?

15 A. We're required to complete it for those
16 firearms I described earlier.

17 We choose to complete that for every
18 firearm transaction, yes.

19 Q. To clarify, when you said "we're required
20 to complete it for the firearms described earlier,"
21 which set of firearms is that?

22 A. We're required to complete that form for
23 pistols, revolvers, and other concealable firearms,
24 typically handguns.

1 Q. But your testimony is that Piasa also
2 completes that information, completes those forms for
3 all rifles and shotguns, for example?

4 A. Correct. We complete that form for every
5 firearm that is purchased or transferred.

6 Q. So every rifle that Piasa has sold, for
7 example, there's corresponding documentation about
8 the stated reason for purchase of that rifle?

9 A. Yes.

10 Q. Where are those forms maintained?

11 A. We maintain that with the ATF Form 4473.

12 Q. Is that information that you submit to the
13 ATF?

14 A. No. ATF does not require us to keep that
15 information, the State does.

16 Q. Okay. Is it fair to say that for each
17 transaction, Piasa will complete both the ATF Form
18 4473 and Piasa's own form documenting the reason for
19 purchase, the occupation, and the purchase price?

20 A. Correct.

21 Q. Is it fair to say that for every firearm
22 that Piasa has sold, by consulting those records, you
23 can determine the stated purpose for the sale of that
24 firearm?

1 A. The stated purpose, yes.

2 Q. How do you determine that purpose?

3 MR. BRADY: Objection, vague, that
4 purpose.

5 MR. HAZINSKI: I'll ask it again.

6 How does Piasa determine the purpose for
7 which each firearm is purchased?

8 THE WITNESS: We do not determine the
9 purpose; that's up to each customer.

10 BY MR. HAZINSKI:

11 Q. Does the -- is the customer responsible for
12 filling out the part of the form that indicates the
13 purpose of the purchase?

14 A. Yes.

15 Q. Does Piasa review that information, as part
16 of the sales process?

17 A. We do.

18 Q. What does that review involve?

19 A. Each employee that assists a customer with
20 the completion of the form reads it over to make sure
21 there's no errors, omissions, and that there's
22 nothing -- the intended purpose isn't for criminal
23 activity.

24 Q. Does Piasa maintain a comprehensive list

1 within a single document of all of the purposes that
2 customers provide for purchasing each firearm?

3 A. You were cut off at the end.

4 I assume you asked comprehensive list of
5 purposes?

6 Q. Correct.

7 A. We do not maintain a single document of
8 that. Each one is separate for each Form 4473.

9 Q. Has Piasa ever consolidated that informa-
10 tion, or analyzed it, to determine what the most
11 frequent purposes for which customers purchase
12 firearms?

13 A. Only by anecdotal.

14 Q. Is it correct to say that Piasa does not
15 have any documents showing an aggregate result or
16 analysis of the reasons for -- let's say, the reasons
17 for which customers are most likely to say they want
18 to purchase a firearm?

19 A. Documentation, no; but experience, yes.

20 Q. Okay. Piasa has six employees in addition
21 to yourself; is that correct?

22 A. Correct. I am not listed as an employee.

23 Q. Piasa has yourself as the owner and six
24 employees; would that be a better way to say it?

1 A. Correct.

2 Q. Do all of those six employees handle sales?

3 A. No.

4 Q. How many of them handle sales?

5 A. I believe we have four listed.

6 Q. Do you handle sales?

7 A. I do.

8 MR. HAZINSKI: I'd like to transition
9 now, I believe, unless -- unless is anybody needing a
10 break at this point? We've been going about 40
11 minutes since the last one.

12 Hearing nothing, I'll just press on.
13 Madam Court Reporter?

14 THE COURT REPORTER: I'm fine.

15 BY MR. HAZINSKI:

16 Q. Thank you.

17 So at this point I'd like to transition
18 away from the questioning in your capacity as 30
19 (b) (6) witness and designee of Piasa Armory to ask
20 questions of you, Mr. Pulaski, in your individual
21 capacity. Does that make sense?

22 A. Yes.

23 Q. Perhaps it doesn't make sense. It's more
24 of a formality, in some ways, than anything that

1 might really materially change the conduct of this
2 deposition; but I wanted to preserve the formality,
3 nonetheless.

4 You understand that you're still under
5 oath, and you're still required to answer questions
6 truthfully, correct?

7 A. I do.

8 Q. Mr. Pulaski, you understand that your
9 attorneys have not identified you as an expert
10 witness in this case, correct?

11 A. I understand.

12 Q. You understand that the opinions you will
13 offer will be based on your own personal knowledge
14 and experience, right?

15 MR. BRADY: Objection --

16 THE WITNESS: I understand.

17 MR. HAZINSKI: I'm sorry, Sean. I want
18 to make sure it's reflected for the record.

19 MR. BRADY: Okay. Objection, vague as to
20 opinions being offered.

21 BY MR. HAZINSKI:

22 Q. You did not prepare a written expert report
23 in this case, did you?

24 A. I didn't hear your entire question.

1 Q. You didn't prepare a written expert report
2 in this case, did you?

3 A. I'm sorry, the tech is cutting you off.

4 I believe you said prepare written expert
5 testimony?

6 Q. Yeah, let me try again. I apologize for
7 any technological issues.

8 The question was, you didn't prepare a
9 written expert report in this case, did you?

10 A. No, I did not.

11 Q. Are you being compensated for your testi-
12 mony today?

13 A. I am not.

14 Q. What is your highest level of education?

15 A. I have an Associate's Degree.

16 Q. What field is that in?

17 A. Criminal justice.

18 Q. Apart from the Associate's Degree in
19 criminal justice, have you taken any other -- have
20 you pursued any other college or university-level
21 studies?

22 A. No.

23 Q. Could you please summarize any formal
24 education you've had relating to firearms?

1 A. I've had numerous trainings as a firearms
2 instructor.

3 Q. Who offered those trainings?

4 A. Again, numerous, but mostly notably the
5 National Rifle Association, the United States Conceal
6 Carry Association.

7 Q. You, personally, own a wide variety of
8 firearms, correct?

9 MR. BRADY: Objection, right to privacy.

10 Mr. Pulaski is not an individual
11 plaintiff in this matter, and he's testified that
12 he's not offering any testimony as to his personal
13 opinions in this matter.

14 He was offered as -- on behalf -- as an
15 officer and representative of Piasa, who is a
16 plaintiff.

17 His personal firearm ownership is fully
18 irrelevant, and it violates his right to privacy, to
19 ask that question.

20 Unless he wants to waive that right, I
21 would instruct him not to answer.

22 BY MR. HAZINSKI:

23 Q. Do you recall testifying in a deposition in
24 October that you own a wide variety of firearms,

1 correct?

2 A. That was my testimony during that deposi-
3 tion.

4 Q. Thank you.

5 Mr. Pulaski, do you provide -- you, per-
6 sonally, provide firearms training at Piasa?

7 A. I do.

8 Q. Does that training include instruction on
9 using firearms for self-defense or personal protec-
10 tion?

11 A. It does.

12 Q. Based on your own experience and observa-
13 tion, do you have opinions about what types of
14 firearms are best suited for self-defense or personal
15 protection?

16 A. I have personal opinions, yes, but that's
17 up to each individual.

18 Q. How did you form those opinions?

19 A. Through experience and research.

20 Q. To prepare for your testimony today, did
21 you review any data or surveys about which firearms
22 are most commonly used for self-defense or personal
23 protection?

24 A. Not in preparation for today's testimony,

1 no.

2 Q. For your -- in preparation for your
3 testimony today, did review any studies or other
4 literature discussing which firearms are best suited
5 for self-defense or personal protection?

6 A. Again, I did not review any studies or
7 other data in prep for today.

8 Q. In your role at Piasa Armory, do you advise
9 customers about what weapons to buy for self-defense
10 purposes?

11 A. I do.

12 Q. I'm going to pose a hypothetical.

13 If a -- if a first time gun buyer comes
14 to Piasa and asks for advice about what firearm to
15 purchase for personal protection or self-defense, how
16 would you advise them?

17 MR. BRADY: Objection, incomplete hypo-
18 thetical, calls for speculation, vague.

19 You may answer.

20 THE WITNESS: That's a case-by-case
21 basis, depending on the specific needs of each
22 customer.

23 BY MR. HAZINSKI:

24 Q. What more information would you need in

1 order to advise that customer about what firearm they
2 ought to buy?

3 A. We would need information about the speci-
4 fic intended use of the firearm, what potential
5 threats they may face, what type of budget they have
6 in mind for their purchase, and what prior experience
7 they have.

8 Q. Are there any specific firearms or cate-
9 gories of firearms that you have found you most
10 frequently recommend to first time gun buyers looking
11 to purchase a firearm for self-defense or personal
12 protection?

13 MR. BRADY: Objection, incomplete hypo-
14 thetical and vague.

15 You may answer.

16 THE WITNESS: Again, that depends on the
17 intended purpose.

18 We may recommend one type of firearm for,
19 say, conceal carry, and another type of firearm for
20 home protection.

21 Again, it depends on the case by case.

22 BY MR. HAZINSKI:

23 Q. I understand it can vary by the context of
24 each individual.

1 My question is more asking overall, in
2 your many years of experience selling these weapons
3 and advising customers, are there certain weapons or
4 categories of weapons that you tend to more
5 frequently recommend for personal protection or
6 self-defense?

7 MR. BRADY: Objection --

8 THE WITNESS: There are two cat -- Go
9 ahead.

10 MR. BRADY: Objection, incomplete hypo-
11 thetical, misstates testimony.

12 You may answer.

13 THE WITNESS: We do have two particular
14 recommendations regularly for customers, prior to
15 PICA's enactment.

16 BY MR. HAZINSKI:

17 Q. What are those?

18 A. I typically recommend AR-15-style rifles
19 for home defense, and Glock-style handguns for
20 concealed carry.

21 Q. Why did Piasa recommend AR-15-style rifles
22 for home defense?

23 A. We recommend those based on ease of use by
24 a variety of people. They're extremely customizable.

1 For example, a large male can use the
2 same firearm as a smaller female, and they also have
3 a standard capacity magazine that allows defense
4 against more than one threat.

5 Q. What does the phrase, standard capacity
6 magazine, refer to?

7 A. That's different for each firearm, but the
8 current standard capacity for AR-15s is 30 rounds.

9 Q. So you recommend AR-15s, or I should say,
10 before PICA was enacted, Piasa -- Strike that ques-
11 tion.

12 Before PICA was enacted, you recommended
13 AR-15s for home defense, in part because magazines
14 came standard at 30 rounds for many of those weapons,
15 correct?

16 MR. BRADY: Objection, misstates testi-
17 mony.

18 MR. HAZINSKI: Did I characterize your --
19 did I characterize your testimony correctly?

20 THE WITNESS: I'm sorry, it cut you off
21 again.

22 MR. HAZINSKI: The question is, I just
23 want to clarify -- you recommended AR-15s for home
24 defense, in part because of the large standard

1 capacity magazine size for such weapons, correct?

2 MR. BRADY: Objection, misstates --

3 THE WITNESS: That was one of -- one of
4 the many reasons.

5 MR. HAZINSKI: Okay.

6 THE COURT REPORTER: What was the rest of
7 the objection, Sean?

8 MR. BRADY: Oh, just it misstates testi-
9 mony.

10 THE COURT REPORTER: Thank you.

11 BY MR. HAZINSKI:

12 Q. Why do you recommend Glock firearms for
13 self-defense?

14 MR. BRADY: Objection --

15 THE WITNESS: It depends on --

16 MR. BRADY: -- misstates testimony.

17 THE WITNESS: That depends on many
18 factors.

19 Again, we ask several questions of
20 customers when they're looking for firearms for
21 self-defense.

22 Typically, for somebody who is less
23 experienced, or fits within a certain budget, or
24 prefers a certain style, those are the reasons we

1 recommend Glock-style firearms.

2 BY MR. HAZINSKI:

3 Q. Have you ever advised a customer or a
4 potential customer that a certain firearm would not
5 be suitable for self-defense or personal protection?

6 A. We have, yes.

7 Q. Which firearms?

8 A. Typically those firearms with a history of
9 poor reliability.

10 Q. And which firearms are those?

11 A. Some of the firearms that are regulated
12 under Illinois' melting point law tend to fall into
13 that category.

14 Q. Other than firearms under Illinois's
15 melting point law, are there any firearms that you've
16 advised a customer or a potential customer that they
17 would not be suitable for self-defense or personal
18 protection?

19 A. Without an encyclopedic listing of every
20 firearm we've ever recommended, I wouldn't be able to
21 recommend which ones, but I'm certain that we have in
22 the past.

23 Q. Other than poor reliability, are there any
24 other reasons that you have advised customers that a

1 certain firearm is not suitable for personal protec-
2 tion or self-defense?

3 A. Typically, it's poor reliability or diffi-
4 culty in use, would be the two categories that would
5 make us recommend away from a certain firearm.

6 Q. Can you explain what you mean by "diffi-
7 culty in use"?

8 A. A firearm that's overly complicated to load
9 or fire or fix a malfunction.

10 Q. Can you give me examples of firearms that
11 are in that category?

12 A. The most immediate would be the Kel-Tec
13 brand shotgun KSG. They're a little difficult to
14 load, for someone who's not experienced with firing
15 shotguns.

16 Q. Have you ever advised a customer to buy a
17 revolver for personal protection or self-defense?

18 A. I typically advise against those for most
19 customers, but they -- we have for sure recommended
20 those for customers in the past, yes.

21 Q. Why do you typically advise against them?

22 A. Typically people that are recommended --
23 that come in looking for those are recommended by
24 someone who doesn't have relevant firearm experience

1 or is going off of recommendations from the past, and
2 typically involves a person who doesn't have the
3 ability to use that firearm reliably or proficiently.

4 Q. In your opinion, is it -- are revolvers too
5 difficult to use reliably or efficiently to be suit-
6 able for personal protection or self-defense for most
7 consumers?

8 A. No. I believe they're suitable for self-
9 defense; however, they're not the best choice for
10 self-defense for most consumers.

11 Q. Have you ever advised a customer to buy a
12 pump action shotgun for personal protection or
13 self-defense?

14 A. We have, especially since the passage of
15 PICA.

16 Q. Why have you recommended pump action
17 shotguns for personal protection or self-defense?

18 A. Again, it depends on the specific circum-
19 stances of each customer and what reason for purchase
20 they may have; but now, because of PICA, the list of
21 firearms that are available, the long-end category
22 rifles or shotguns, is heavily restricted to mostly
23 pump action shotguns and very few semiautomatic
24 rifles.

1 Q. Have you recommended SKS rifles with
2 detachable magazines to customers for personal
3 protection or self-defense?

4 A. We have not been asked if one of those was
5 recommended for self-defense by a customer, to my
6 recollection.

7 Typically we'd recommend a modern firearm,
8 rather than a firearm that would be of the SKS era or
9 variety.

10 Q. Have you recommended rifles chambered with
11 50 caliber BMG ammunition for personal protection or
12 self-defense?

13 A. We have not, and have not been asked if
14 that would be a suitable firearm for self-defense,
15 that I can recall.

16 Q. You have not been asked, and you have also
17 not offered that as a -- as a suggestion to a cus-
18 tomer seeking a weapon for personal protection or
19 self-defense; is that fair?

20 A. Correct.

21 Q. Why not?

22 A. I'm sorry. Did you ask why?

23 Q. Yeah, why?

24 A. Sure. The typical 50 caliber BMG chambered

1 rifle is extremely heavy, very large, and expensive.

2 Q. The -- What effect does the fact that the
3 typical 50 caliber BMG rifle is heavy and large, what
4 effect does that have on its utility for self-defense
5 or personal protection?

6 A. I think that would depend on each individ-
7 ual, but a small-statured woman would have difficulty
8 in using a 20-pound rifle or heavier.

9 Q. Have you ever recommended a rifle chambered
10 in 50 caliber BMG ammunition to a large-statured man
11 for the purpose of personal protection or self-
12 defense?

13 A. Again, we have not been asked that question
14 by anybody, to my knowledge, but we would recommend
15 something smaller and easier to use for most people.

16 Q. Have you recommended semiautomatic firearms
17 with a capacity to accept a belt ammunition feeding
18 device for personal protection or self-defense?

19 A. We have not been asked that question in the
20 past.

21 Typically, belt fed semiautomatic
22 firearms are not readily available to most customers,
23 and the modern offerings are very limited, and are
24 sold directly to most consumers instead of through

1 dealers.

2 Q. When you say "they're not readily avail-
3 able," what do you mean?

4 A. Sorry; some clarity.

5 The most commonly belt fed firearms that
6 we've dealt with are reproductions of antique
7 firearms or firearms that would be -- not antique,
8 pardon me -- antique firearms that would -- older
9 firearms that would be covered under the curio and
10 relics category, older than 50 years.

11 There are some modern versions of those,
12 but again, they're expensive, and not a common item
13 that we would have offered for sale.

14 Again, the manufacturer of those tends to
15 prefer to sell directly to the consumer and use
16 dealers only as a transfer.

17 Q. Assuming that a customer came to Piasa
18 and asked you whether a semiautomatic firearm with
19 capacity to accept belt fed ammunition feeding device
20 was suitable for personal protection or self-defense,
21 how would you advise a customer in that situation?

22 MR. BRADY: Objection, incomplete hypo-
23 thetical, calls for speculation.

24 You may answer.

1 THE WITNESS: If somebody asked us for a
2 belt fed semiautomatic firearm for self-defense, we
3 would basically ask them what the intended purpose
4 was for.

5 Again, self-defense, we would tend to
6 recommend against something that's a little bit
7 easier to use for most consumers; again, something
8 like the standard AR-15-style firearm that has an
9 easily detachable magazine instead of a belt
10 ammunition device.

11 BY MR. HAZINSKI:

12 Q. Okay. I'm going to ask about shotguns with
13 revolving cylinders.

14 Is it -- is it theoretically possible for
15 a person to use a shotgun with a revolving cylinder
16 for personal protection or self-defense?

17 MR. BRADY: Objection, calls for specu-
18 lation, incomplete hypothetical.

19 You can answer.

20 THE WITNESS: It's possible for anyone to
21 use any firearm of any variety-type style caliber as
22 a self-defense item.

23 BY MR. HAZINSKI:

24 Q. One of the fire -- types of firearms that

1 Piasa has sold is a (inaudible) KS-12 shotgun,
2 correct?

3 THE COURT REPORTER: Wait.

4 Repeat that, please.

5 MR. HAZINSKI: I'll go slower.

6 One of the types of firearms that Piasa
7 has sold is a Kalashnikov KS-12 shotgun, correct?

8 THE WITNESS: Without reviewing specific
9 records, I would presume that we have at some point
10 transferred or sold something like that.

11 BY MR. HAZINSKI:

12 Q. What type of weapon is the Kalashnikov
13 KS-12?

14 A. To the best of my recollection, that is an
15 AK-47 platform derivative, shoots 12 gauge ammuni-
16 tion.

17 Q. Have you ever recommended a Kalashnikov
18 KS-12 for personal protection or self-defense?

19 A. That specific firearm, no.

20 Q. Would you recommend it for those purposes?

21 A. It is possible.

22 It would not be among the first of my
23 recommendations, but it could be on that list, yes.

24 Q. What are the circumstances where you might

1 recommend the Kalashnikov KS-12 for personal pro-
2 tection or self defense?

3 A. Again, that would be dependent upon each
4 customer. Everybody that has their own personal
5 preferences and use cases, but those are a type of
6 semiautomatic shotgun that are easy to reload, easy
7 to use for most consumers, apart from a
8 standard-style semiautomatic shotgun.

9 Q. What types of use cases would you recommend
10 the Kalashnikov KS-12 for?

11 A. That would be, again, dependent upon each
12 customer. Again, we typically don't recommend a
13 shotgun for personal defense, other than now, with
14 PICA.

15 We usually recommend -- would potentially
16 recommend something like that for someone who did not
17 want a rifle, but wanted a shotgun.

18 MR. HAZINSKI: I only have a few more
19 questions, but I think since we've been going now for
20 a while, let's take a short break, and I'll probably
21 wrap up within -- within a little while, and maybe we
22 can avoid taking a -- taking a longer lunch break; is
23 that okay with everybody?

24 MR. BRADY: Fine by me.

1 THE WITNESS: Yes.

2 MR. HAZINSKI: All right, maybe we'll
3 reconvene at 12:30, if that's acceptable?

4 MR. BRADY: Perfect.

5 MR. HAZINSKI: Thank you.

6 (Recess taken)

7 DIRECT EXAMINATION CONTINUED

8 BY MR. HAZINSKI:

9 Q. I just have few more questions before we
10 wrap up.

11 I want to show you again the
12 interrogatory responses that I asked you about
13 earlier.

14 This is Exhibit 3, and I'll attempt to
15 share my screen.

16 Mr. Pulaski, can you see this document on
17 your screen?

18 A. Yes.

19 Q. I want to ask about the response to
20 Interrogatory No. 8, which says "Responding Party may
21 rely on testimony from Scott Pulaski, a longtime
22 federally licensed firearm dealer, about the nature
23 of the firearms market in Illinois before and after
24 the adoption of PICA." Do you see that?

1 A. I do.

2 Q. Just to be clear, the testimony you are
3 giving in this case is testimony as a lay witness,
4 based on your personal observation and experience,
5 rather than as a disclosed expert witness, correct?

6 MR. BRADY: Objection, calls for a legal
7 conclusion.

8 You may answer.

9 THE WITNESS: Again, I'm not a legal
10 expert, but my understanding is I'm just testifying
11 as a representative of Piasa Armory, and part of it
12 is my personal experience in the firearms industry.

13 BY MR. HAZINSKI:

14 Q. So, for example, have you conducted any
15 studies of the firearms market in Illinois?

16 A. Our company has conducted studies of the
17 firearms market through the National Shooting Sports
18 Foundation in the past.

19 Q. When you say "our company," are you refer-
20 ring to Piasa Armory?

21 A. Yes, Piasa Armory.

22 Q. Okay. Can you -- you mentioned studies.

23 Which studies are you referring to?

24 A. The National Shooting Sports Foundation

1 provides customized market reports, which is the
2 number of potential customers in a given area,
3 depending on what each company requests.

4 They also provide data that they have
5 collected over the years.

6 Q. How many of these reports has Piasa
7 received from NSSF?

8 A. I don't recall the exact number of reports
9 the customized market detail, but I believe two; and
10 I review the other reports on an every so often
11 basis, every other year or so, which offerings may be
12 available through NSSF.

13 Q. You mentioned the customized market
14 reports, and you said there have been about two of
15 those, right?

16 A. Correct, that I recall.

17 Q. Okay. There are other reports, as well,
18 from NSSF, correct?

19 A. Yes.

20 Q. What are those reports?

21 A. Again, there's -- there are many.

22 They conduct extensive surveys and
23 reporting on the industry trends, but I can think of
24 some of, you know, new entries into the shooting

1 sports world by minorities and women, firearms that
2 are -- firearms that are like a modern sporting
3 style, firearms that are prevalent in the industry,
4 and trends in hunting and -- and other similar use of
5 firearms that we've reviewed in the past.

6 Q. Those studies from NSSF that you were just
7 describing, are those studies all conducted by NSSF?

8 MR. BRADY: Objection, calls for specula-
9 tion.

10 THE WITNESS: I can't testify to the
11 methods and modes of compiling that information,
12 because we're not the ones --

13 MR. HAZINSKI: Are all those --

14 THE WITNESS: -- who did it.

15 BY MR. HAZINSKI:

16 Q. Are all those reports and studies published
17 by NSSF?

18 MR. BRADY: Objection, calls for specula-
19 tion.

20 THE WITNESS: Again, I have no knowledge
21 of whether they are published by or merely provided
22 by NSSF. We just have access to them through our
23 membership with NSSF.

24 BY MR. HAZINSKI:

1 Q. Are you or Piasa Armory responsible for
2 conducting or authoring any of those studies?

3 A. No.

4 Q. I'm going to ask more about the customized
5 market reports.

6 What kind of information is included in
7 those reports?

8 A. That information was demographic and
9 household data from a given distance from our address
10 that we provided.

11 Q. Do you or does Piasa provide information
12 to NSSF in order to facilitate the creation of those
13 customized market reports?

14 A. We have not ordered one of those reports in
15 several years, but the best of my recollection is we
16 just provided our address, and they conducted that,
17 based on available data.

18 Q. Other than the number of potential custo-
19 mers within a certain geographic range, do the
20 customized market reports provide additional infor-
21 mation?

22 A. I think they have estimates based on NSSF's
23 other data of how many potential customers there may
24 be in that given area.

1 Q. Do they contain any other information other
2 than the number of potential customers?

3 A. I would need to review that data again.
4 It's been a little while.

5 Q. When was the last time Piasa received one
6 of these customized market reports from NSSF?

7 A. Again, I need to review our -- our order
8 history from them, but I believe it was 2016,
9 thereabouts.

10 Q. Any particular reason that you stopped
11 requesting those customized market reports from NSSF?

12 A. One factor was the cost. They aren't --
13 they aren't free; we have to pay them for that data.

14 We also typically did them when we
15 relocated.

16 Q. To prepare for your deposition today, did
17 you specifically review any of the NSSF reports or
18 studies that you referred to earlier?

19 A. As I said earlier, I did not review any
20 NSSF studies before.

21 Q. The NSSF studies that you mentioned, not
22 the customized market reports, but the other studies
23 produced by NSSF, do any of those specifically
24 discuss the market for firearms in Illinois?

1 A. Not to my knowledge.

2 Q. Do you have access to any statewide data on
3 firearm sales in Illinois?

4 A. They're, to my knowledge, not comprehensive
5 statewide data of firearm sales, only the transaction
6 numbers that we receive from state police when we
7 conduct background checks and surveys conducted
8 through groups like NSSF and National Rifle Associ-
9 ation.

10 Q. Apart from the customized market reports
11 you discussed earlier, does Piasa conduct any market
12 research or market analysis as part of its business
13 operations?

14 A. Other than reviewing our sales data, no.

15 Q. Based on your personal experience and
16 observations, how would you describe the effect of
17 PICA on the firearms market in Illinois?

18 MR. BRADY: Objection, vague, calls for a
19 narrative.

20 You may answer.

21 THE WITNESS: My personal experience
22 with our customers is that they are concerned of the
23 status of the firearms marketed in Illinois. They
24 have a lot of uncertainty which items are legal,

1 which are not legal, which are allowed under PICA,
2 what the requirements for compliance with PICA may
3 be. Many are afraid to purchase new, for fear that
4 they are -- or transfer new, for fear that they are
5 not complying with PICA.

6 BY MR. HAZINSKI:

7 Q. Other than observing that your customers
8 are concerned about the status of certain items and
9 their lawfulness under PICA, and their fear of trans-
10 ferring certain items under PICA, have you observed
11 any other effects of PICA on the firearms market in
12 Illinois?

13 MR. BRADY: Objection, misstates testi-
14 mony, vague, calls for a narrative, incomplete
15 hypothetical.

16 You may answer.

17 THE WITNESS: Statements from customers
18 that we've heard many times of that they are un-
19 willing to purchase now, or are waiting until PICA
20 makes its way through the court system, until the
21 cases have resolution, before they'll be interested
22 in purchasing certain things again, or anything
23 again.

24 BY MR. HAZINSKI:

1 Q. Okay. Is it a fair summary of your
2 testimony to say that based on your experience and
3 observations, customers are concerned about whether
4 particular items may or may not be regulated by PICA,
5 customers have expressed a fear of transferring
6 firearms, and plus customers have expressed an un-
7 willingness to purchase new firearms while there's
8 ongoing litigation; is that a fair summary of your
9 testimony?

10 A. I wouldn't say most customers, but I would
11 say many customers.

12 Q. Other than those observations, have you
13 made any other observations about the effect of PICA
14 on the firearms market in Illinois?

15 A. Just what I stated.

16 Q. Those observations are based on conversa-
17 tions you've had with customers at Piasa Armory,
18 correct?

19 A. Yes, customers that we've interacted with
20 here.

21 Q. Were those opinions and observations based
22 on anything else in addition to those conversations?

23 A. No, just what we've observed with customers
24 and people in the area that have come in and talked

1 to us about PICA observations.

2 Q. Just give me one quick moment here.

3 Would it being fair to say that the
4 impressions that you have of the effects of PICA on
5 potential gun buyers in Illinois is based on anec-
6 dotal observation, rather than something like a
7 comprehensive survey?

8 MR. BRADY: Objection, vague.

9 THE WITNESS: To my knowledge, there is
10 not a comprehensive survey of Illinois for that.
11 That's not a -- not a thing that's been done by the
12 national organizations, to my knowledge.

13 BY MR. HAZINSKI:

14 Q. Just to sort of return to the question,
15 then, your -- your observations are -- would it be
16 fair to say that your observation about the effect of
17 PICA on the firearms market in Illinois are based on
18 your overall impressions based on particular conver-
19 sations?

20 A. Yes, interactions with customers and
21 members of the Illinois public.

22 Q. Do those conversations that you've had
23 allow you to create a -- any numerical estimates
24 about, for example, the effect on rates of sale of

1 particular firearms in Illinois?

2 A. Nothing concrete that we could base a study
3 off of, just anecdotal customers who state they would
4 have purchased an item but for PICA, or would have
5 purchased a second item that was not necessarily PICA
6 compliant, but for PICA.

7 Q. The last thing, the NSSF studies that you
8 mentioned, other than the customized market reports,
9 those generally describe trends in the firearms
10 industry nationwide; is that fair?

11 A. That's fair, yes.

12 Q. Have any of those studies informed your
13 opinions about the effect of PICA on the Illinois
14 firearms market?

15 A. Every bit of information I take in affects
16 my opinions of PICA on the Illinois firearms market,
17 so NSSF and any other relevant information.

18 Q. Are there any particular pieces of informa-
19 tion from national NSSF reports that you can speci-
20 fically identify that have affected your view about
21 the effect of PICA on the Illinois firearms market?

22 A. I would need to refer to the specific
23 study, but I recall, I believe, an NSSF study that
24 mentioned that the AR-15 platform was more common

1 than the F150 pickup truck in the U.S., as far as
2 private ownership.

3 Q. Did you ever examine the -- the data or
4 methodology underlying NSSF's estimates of the number
5 of AR-15s in circulation in the United States?

6 A. I have not --

7 MR. BRADY: Objection to the underlying
8 data.

9 MR. HAZINSKI: I'm sorry, I didn't hear
10 the answer.

11 THE WITNESS: I was letting Mr. Brady
12 finish his speech.

13 I'm not a statistician or expert in
14 methodology, so I can't speak to the methodology and
15 information they use, just that they are the recog-
16 nized expert in our industry.

17 BY MR. HAZINSKI:

18 Q. Other than conclusions from NSSF that
19 AR-15s are more frequent than Ford F150s, are there
20 any other specific pieces of information from NSSF
21 research that you can identify that have shaped your
22 understanding of the effect of PICA on the Illinois
23 firearms market?

24 A. Not that I can cite specifically.

1 I would have to review all the variety of
2 studies we've purchased over the years and had access
3 to over the years.

4 MR. HAZINSKI: Thank you, Mr. Pulaski.

5 I don't have any other questions.

6 THE COURT REPORTER: Do you mind taking
7 down the exhibit? Thank you.

8 MR. HAZINSKI: Does anyone have anything
9 else?

10 MR. BRADY: Nothing for me.

11 MR. SIGALE: No questions.

12 MR. HOERNER: I don't have any questions.

13 MS. GANNON: Nothing from me, thanks.

14 THE COURT REPORTER: Okay. John, are you
15 ordering this transcribed?

16 MR. HAZINSKI: Yes, please.

17 THE COURT REPORTER: Sean, copy?

18 MR. BRADY: Yes, please.

19 THE COURT REPORTER: Would anybody else
20 like a copy?

21 MR. SIGALE: Ms. Hylton, this is David
22 Sigale.

23 We're not going to order at this time,
24 but we'll certainly let you know if we -- if we

1 decide to get a copy later.

2 THE COURT REPORTER: All right.

3 Mr. Lothson, whom do you represent?

4 MR. LOTHSON: I represent the Barnett
5 plaintiff group.

6 Yes, I'll take a copy.

7 (Reading and signing of the deposition
8 was not waived.)

9 (The deposition concluded at 12:52 p.m.)

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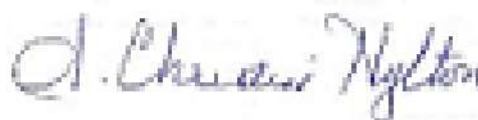
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C E R T I F I C A T E

I, the undersigned, a Certified Shorthand Reporter, Registered Professional Reporter and Notary Public, do hereby certify that I acted as the Registered Professional Reporter in the foregoing matter at the time and place indicated herein; that I took in shorthand the proceedings had at said time and place; that said shorthand notes were reduced to typewriting under my supervision and direction, correct transcript of the shorthand notes so taken; that said deposition was submitted to the witness for signature as requested and that any changes, if any, requested by the witness are attached hereto.

I further certify that I am neither attorney nor counsel for, or related to or employed by any of the parties in the foregoing matter, and further that I am not a relative or employee of any attorney or counsel employed by the parties hereto, or financially interested in the action.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 4th day of June, 2024.



A. Christine Hylton
Registered Professional Reporter
and Notary Public

1 Veritext Legal Solutions
2 1100 Superior Ave
3 Suite 1820
4 Cleveland, Ohio 44114
5 Phone: 216-523-1313

6 June 14th, 2024

7 To: SEAN A. BRADY, ESQ.

8 Case Name: Federal Firearms Licensees Of Illinois Et Al. v. Pritzker,
9 Jay Robert "JB" Et Al.

10 Veritext Reference Number: 6721335

11 Witness: Piasa Armory, LLC Deposition Date: 5/31/2024

12 Dear Sir/Madam:

13 Enclosed please find a deposition transcript. Please have the witness
14 review the transcript and note any changes or corrections on the
15 included errata sheet, indicating the page, line number, change, and
16 the reason for the change. Have the witness' signature notarized and
17 forward the completed page(s) back to us at the Production address
18 shown

19 above, or email to production-midwest@veritext.com.

20 If the errata is not returned within thirty days of your receipt of
21 this letter, the reading and signing will be deemed waived.

22 Sincerely,

23 Production Department

24 NO NOTARY REQUIRED IN CA

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DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6721335

CASE NAME: Federal Firearms Licensees Of Illinois Et Al. v. Pritzker, Jay Robert "JB" Et Al.

DATE OF DEPOSITION: 5/31/2024

WITNESS' NAME: Piasa Armory, LLC

In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me.

I have made no changes to the testimony as transcribed by the court reporter.

Date Piasa Armory, LLC

Sworn to and subscribed before me, a Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that:

They have read the transcript;
They signed the foregoing Sworn Statement; and
Their execution of this Statement is of their free act and deed.

I have affixed my name and official seal

this _____ day of _____, 20____.

Notary Public

Commission Expiration Date

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DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6721335

CASE NAME: Federal Firearms Licensees Of Illinois Et Al. v. Pritzker, Jay Robert "JB" Et Al.

DATE OF DEPOSITION: 5/31/2024

WITNESS' NAME: Piasa Armory, LLC

In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me.

I have listed my changes on the attached Errata Sheet, listing page and line numbers as well as the reason(s) for the change(s).

I request that these changes be entered as part of the record of my testimony.

I have executed the Errata Sheet, as well as this Certificate, and request and authorize that both be appended to the transcript of my testimony and be incorporated therein.

Date Piasa Armory, LLC

Sworn to and subscribed before me, a Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that:

- They have read the transcript;
- They have listed all of their corrections in the appended Errata Sheet;
- They signed the foregoing Sworn Statement; and
- Their execution of this Statement is of their free act and deed.

I have affixed my name and official seal this _____ day of _____, 20____.

Notary Public

Commission Expiration Date

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days

after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate.

The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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