

EXHIBIT 4

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

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CALEB BARNETT, et al.,)	
)	
Plaintiffs,)	
vs.)	
)	No.
KWAME RAOUL, et al.,)	3:23-cv-209-SPM
)	
Defendants,)	
-----)	
)	
DIANE HARREL, et. al,)	
)	
Plaintiffs,)	
vs.)	No.
)	3:23-cv-141-SPM
KWAME RAOUL, et. al,)	
)	
Defendants.)	
-----)	
)	
JEREMY W. LANGLEY, et al.,)	
)	
Plaintiffs,)	
vs.)	No.
)	3:23-cv-192-SPM
BRENDAN KELLY, et al.,)	
)	
Defendants.)	
-----)	
)	
FEDERAL FIREARMS LICENSEES OF)	
ILLINOIS, et al.)	
Plaintiffs,)	
vs.)	No.
)	3:23-cv-192-SPM
JAY ROBERT "JB" PRITZKER, et)	
al.)	
Defendants.)	
Reported by: Deborah A. Duffy	CSR, RPR	
License No.: 084-002516		

1 The deposition of STEVEN RANDALL WATT
2 was taken by Deborah A. Duffy, CSR, RPR, pursuant
3 to the applicable provisions of the Federal Code of
4 Civil Procedure and the rules of the Supreme Court
5 of the United States of America, pertaining to the
6 taking of depositions for the purpose of discovery,
7 via Zoom videoconferencing, commencing at
8 approximately 9:30 o'clock a.m. on the 2nd day of
9 July, of the year 2024.

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1 (Witness sworn.)

2 STEVEN RANDALL WATT,
3 called as a witness herein, having been first
4 duly sworn, was examined and testified as follows:

5 EXAMINATION

6 BY MR. TRESNOWSKI:

7 Q. Mr. Watt, can you state your full name
8 for the record?

9 A. Steven with a V. Steven Randall Watt.

10 Q. Do you generally go by Steven or Randy?

11 A. I go by Randy.

12 Q. Good morning. My name is Mike
13 Tresnowski. I will be taking the deposition.

14 A. Thank you. It is good to be with you.
15 If I may, one thing. Please allow me a little bit
16 of latitude. My career has made me hard of
17 hearing. So if I ask for you to repeat it, it is
18 just me.

19 Q. Absolutely. Understood. And I will try
20 to speak clearly and slowly.

21 Randy, you've given a deposition
22 before, correct?

23 A. I have.

24 Q. How many depositions have you given?

1 A. Oh, over the years, and most of them
2 being related to my employment, probably six or
3 seven.

4 Q. Do you understand that you will be
5 testifying under oath?

6 A. I do.

7 Q. And you will answer truthfully just like
8 you are testifying in the courtroom?

9 A. I am.

10 Q. And you understand there is a court
11 reporter on the call that is reporting what is
12 being said?

13 A. I do.

14 Q. And I will ask questions and you will
15 answer them. Do you understand?

16 A. I do.

17 Q. And because the court reporter has to
18 write down everything we say, it is important that
19 we do not talk over each other. Do you understand?

20 A. I do.

21 Q. So you need to wait for me to finish my
22 question even if you think you know where I'm going
23 with the question. Understood?

24 A. Certainly.

1 Q. And I will do the same with your
2 answers.

3 Now, you may hear your attorney
4 speak up and state an objection for the record, but
5 you will still need to answer my questions unless
6 the attorney stops -- unless the attorney stops to
7 discuss a privilege.

8 Does that make sense?

9 A. It does.

10 Q. If you don't understand one of my
11 questions on the deposition today, please tell me.

12 A. I will.

13 Q. But if you do answer I will assume you
14 understood the question. Does that make sense?

15 A. Yes.

16 Q. We will take breaks today. We will look
17 for a good time to do it, but probably every hour.
18 We got started here at around 9:30 central time.

19 You can also ask for a break as
20 long as there is no question that is not -- as long
21 as there is no question pending.

22 Does that make sense?

23 A. Yes.

24 Q. Are you on any medication today that

1 would prevent you from giving truthful testimony?

2 A. No.

3 Q. Is there anything else that would
4 prevent you from testifying truthfully and
5 accurately today?

6 A. No.

7 Q. We are doing the depositions over Zoom.
8 I'm sitting in Chicago, Illinois. Where are you
9 today?

10 A. I'm sitting in my home in Morgan County,
11 Utah.

12 Q. Is there anyone else in the room with
13 you?

14 A. No.

15 Q. And you are testifying on a computer?

16 A. I am.

17 Q. Are there any other applications open on
18 your computer?

19 A. No.

20 Q. Do you have your phone in view right
21 now?

22 A. No.

23 Q. And you understand that while we are on
24 the record, the only way to communicate with your

1 attorney is by speaking out loud?

2 A. That is correct.

3 Q. And do you have any documents in front
4 of you right now?

5 A. No.

6 Q. If you have any problems with the
7 technology we are using today, please let me know.
8 Do you understand?

9 A. I will.

10 Q. Do you understand the lawsuit you are
11 being deposed here today is Barnett v. Raoul; 23 CV
12 209 pending in the United States District Court for
13 the Southern District of Illinois?

14 A. I do.

15 Q. And do you understand there are three
16 other cases that have been consolidated with the
17 Barnett Case? That is Harrel v. Raoul, 23 CV 141;
18 Langley v. Kelly, 23 CV 92; Federal Firearms
19 Licensees of Illinois v. Pritzker, 23 CV 215?

20 A. I do.

21 Q. Do you understand that the deposition
22 you are giving today may be used in all four of
23 those cases?

24 A. I do.

1 Q. Are you aware that the plaintiffs in all
2 four cases have identified you to the court and
3 other parties in this litigation as a potential
4 witness?

5 A. I am.

6 Q. Some of the plaintiffs in this case are
7 organizations. Are you a member of any of the
8 organizations that are plaintiffs in this case?

9 A. No.

10 Q. Who retained you to offer an opinion in
11 this case?

12 A. Sean Brady.

13 Q. Is Sean Brady the only individual who
14 has retained you to participate in this case?

15 MR. BRADY: Objection. Vague. You may
16 answer.

17 THE WITNESS: Yes.

18 BY MR. TRESNOWSKI:

19 Q. How much are you being paid for your
20 testimony in this case?

21 A. \$275 an hour.

22 Q. Do you have any personal relationship to
23 any plaintiff in this case?

24 A. No.

1 Q. Do you have any financial relationships
2 to any plaintiff in this case?

3 MR. BRADY: Objection. Vague.

4 BY MR. TRESNOWSKI:

5 Q. Do you have any personal relationship to
6 any attorney in this case?

7 MR. BRADY: Objection. Vague.

8 THE WITNESS: No.

9 BY MR. TRESNOWSKI:

10 Q. Other than the arrangement we just
11 discussed, the \$275.00 to testify, do you have any
12 financial arrangement with any attorney in this
13 case?

14 MR. BRADY: Objection. Vague.

15 THE WITNESS: No.

16 BY MR. TRESNOWSKI:

17 Q. Did you graduate high school?

18 A. I did.

19 Q. Where did you go to high school?

20 A. Harry Ainlay High School in Edmonton,
21 Alberta, Canada.

22 Q. What year did you graduate --

23 A. 1975.

24 Q. Were you born in Canada?

1 A. I was.

2 Q. Did you live in Canada throughout the
3 time of your childhood through high school?

4 A. I did.

5 Q. When did you come to the U.S?

6 A. 1978.

7 Q. Did you come to the U.S. specifically to
8 pursue college education?

9 A. I did.

10 Q. What degrees did you obtain after your
11 high school degree?

12 A. I have a two-year degree in law
13 enforcement from Lethbridge Community College in
14 Lethbridge, Alberta, Canada.

15 I have a bachelor's degree
16 in police science from Weaver State college in
17 Ogden, Utah.

18 I have a master's degree in
19 business from the University of Phoenix, and I have
20 a master's degree in strategic studies from the
21 United States Army War College.

22 Q. Any other degrees?

23 A. No.

24 Q. Do you have any training in statistical

1 methodology?

2 A. Just what was contained in the classes
3 in my college degrees.

4 Q. So which of your college degrees
5 included training on statistics?

6 A. The bachelor of science degree in police
7 science and the MBA.

8 Q. How many statistic -- so you took a
9 statistics course as part of your degree in police
10 science?

11 A. Now, remember we are talking quite a few
12 years ago, but I remember taking at least one
13 statistics class in my bachelor's program.

14 Q. And what was your training in
15 statistical methodology that you received as part
16 of your MBA?

17 A. I remember taking a business statistics
18 class in my MBA, but, again, you're talking a long
19 time ago.

20 Q. Do you have any training in conducting
21 market research?

22 A. No.

23 Q. You served in the military, correct?

24 A. Yes.

1 Q. When did you first enlist in the
2 military?

3 A. 31 November, 1981.

4 Q. And so when did you just -- remind me
5 again. When did you graduate with the bachelor's
6 in police science?

7 A. 1980.

8 Q. So you enlisted in the military a little
9 over a year after receiving your bachelor's
10 degree?

11 A. That is correct.

12 Q. And what service did you enlist in?

13 A. Utah Army National Guard.

14 Q. And you enlisted while you also worked
15 as a police officer, correct?

16 A. That is correct.

17 Q. Can you explain kind of how you manage
18 your time working both as a police officer and
19 serving in the National Guard?

20 A. Sure. Those two careers ran
21 simultaneously.

22 Q. I guess what I'm trying to get at is a
23 sense of how frequently were you working as a
24 police officer and how frequently were you

1 performing duties in connection with your military
2 service?

3 A. I performed as a police officer as a
4 full-time employment. I performed in the Utah Army
5 National Guard in accordance with the requirements
6 with reservists, which are so many -- what you call
7 unit training assemblies per month, and some active
8 duties for training or active duty hours during the
9 year.

10 Q. And how long did you serve in the Utah
11 Army National Guard?

12 A. 33 years, 10 months to the day.

13 Q. And is that the only service in which
14 you were enlisted?

15 MR. BRADY: Objection. Vague.

16 THE WITNESS: Yes.

17 BY MR. TRESNOWSKI:

18 Q. And as part of your military service,
19 you served in active duty, correct?

20 A. Several times. Yes.

21 Q. And when did you first serve in active
22 duty?

23 A. So active duty is any time you are on
24 state or federal orders for a specific period of

1 time. There were a lot of them. Training schools
2 are active duty periods. Certain deployments are
3 active duty periods, and then the deployment on
4 global war on terrorism were and active duty
5 period.

6 Q. And did you deploy overseas as part of
7 your military service?

8 A. Yes.

9 Q. When and where did you first deploy?

10 A. Well, you will want me to enumerate,
11 because the type of service that I did, you
12 deployed almost every year to a foreign country
13 based on a military requirement.

14 Q. Can you explain what you mean by the
15 type of service you did?

16 A. Overseas?

17 Q. Well, you said that given the type of
18 service you did, you were deploying frequently.
19 So what type of service do you mean?

20 A. You are assigned a mission by a military
21 headquarters. So you're -- based on the type of
22 unit you are serving in, you will be assigned
23 missions overseas to conduct certain types of
24 operations.

1 Q. And what mission did you have in your
2 military service?

3 A. Most of the missions prior to the war
4 were what are known as foreign internal defense,
5 where you go to support post-nation allies and
6 train their militaries in very specialized
7 activities.

8 Q. And you said that was before your --
9 before the global war on terror?

10 A. Correct.

11 Q. So your mission before the global war on
12 terror was to deploy overseas and conduct internal
13 training?

14 A. I trained host nations that were allies
15 of the United States.

16 Q. Did you deploy to Afghanistan in 2001?

17 A. I was on active duty from December 2001
18 to December 2002. The majority of that service was
19 in Afghanistan.

20 Q. And what was the nature of your mission
21 during that deployment?

22 A. Conduct direct action and conduct direct
23 action missions against the enemies of the United
24 States.

1 Q. What are "direct action missions"?

2 A. Engage the enemy in combat.

3 Q. What was your role in those direct
4 action missions?

5 A. I was the commander of an advanced
6 operations base in east central Afghanistan.

7 Q. What are the duties as the commander?

8 A. Locate and destroy enemy forces,
9 maintain a presence in the regional core area, deny
10 sanction to the enemy.

11 Q. Was your service in Afghanistan in 2001
12 and 2002 part of the special forces?

13 A. Yes.

14 Q. And you were a member of the special
15 forces?

16 A. Yes.

17 Q. What is special forces?

18 A. United States Army Special Forces. That
19 term designates specific units within the United
20 States Army colloquially known as the Green Berets.

21 Q. What makes service in the Green Berets
22 different than other forms of the military service?

23 A. We just had a different mission.

24 Q. And what was the mission?

1 A. The mission of the Green Berets as a
2 collective unit is to support national security
3 objectives and national command ability.

4 The mission in Afghanistan is
5 what I already delineated.

6 Q. Did you engage in combat during your
7 2001 and 2002 service in Afghanistan?

8 A. Yes.

9 Q. Did you fire your weapon?

10 A. Yes.

11 Q. What weapon did you fire during that
12 service?

13 A. I utilized an army-issued M4 carbine, an
14 army-issued M9 pistol.

15 Q. Anything else?

16 A. Not that I fired.

17 Q. After December of 2002 you returned back
18 to Utah?

19 A. I did.

20 Q. When did you next deploy overseas?

21 A. 2006/2007.

22 Q. Where did you deploy?

23 A. Baghdad, Iraq.

24 Q. And was that service, again, as a member

1 of the special forces?

2 A. I was assigned to a specific
3 headquarters.

4 Q. What was the specific headquarters?

5 A. Multinational security and training
6 command.

7 Q. What is Multinational security training
8 command?

9 A. That was the headquarters I was assigned
10 to.

11 Q. And what was your mission at that
12 headquarters?

13 A. I was the counterterrorism advisor to
14 the National Iraqi counter terrorism command
15 headquarters.

16 Q. Did you engage in combat during that
17 deployment to Iraq in 2006?

18 A. No.

19 Q. When did you return to the U.S. after
20 deployment to Iraq?

21 A. It was June of 2007.

22 Q. Did you deploy again overseas after
23 that?

24 A. I did.

1 Q. When and where?

2 A. 2010 to Camp Liberty in Iraq.

3 Q. And what was the nature of your mission
4 at Camp Liberty Iraq?

5 A. I was the what's known J5 strategic
6 chief for counter -- United States counter
7 terrorism headquarters.

8 Q. Did you engage in combat during tour of
9 service?

10 A. No.

11 Q. You are involved in this litigation as a
12 firearms expert, correct?

13 A. Yes.

14 MR. BRADY: Objection. Vague.

15 BY MR. TRESNOWSKI:

16 Q. Does your military experience inform
17 your understanding of firearms?

18 A. Yes.

19 Q. How so?

20 (Technical difficulty.)

21 THE COURT REPORTER: I apologize for the
22 inconvenience, but I lost my connection. Counsel,
23 I will read back the last question and ask that you
24 restate your question.

1 (Record read as requested.)

2 BY MR. TRESNOWSKI:

3 Q. I will ask the question again.

4 Does your military experience
5 inform your understanding of firearms?

6 MR. BRADY: Objection. Vague.

7 THE WITNESS: Yes.

8 BY MR. TRESNOWSKI:

9 Q. How so?

10 A. As an enlisted soldier, my military
11 occupational specialty, my MOS in special forces
12 was as a weapon specialist.

13 I received direct training,
14 continued training on the use of small arms, both
15 by U.S. and foreign forces, and then there were
16 continued periods of training in a wide variety of
17 firearms and weapons throughout my military career
18 including weapons that were utilized during covert
19 operations.

20 I was also certified by United
21 States Army Special Forces as an instructor in a
22 couple of these areas.

23 Q. I think you drew a distinction between
24 arms used by the U.S. military and foreign arms.

1 Is that correct?

2 A. Would you repeat that for me?

3 Q. Sure. Did you draw a distinction
4 between American arms and foreign arms?

5 A. I'm not sure what you mean. I was
6 trained in both.

7 Q. Okay. I just want to try and
8 understand. You said that you were trained in
9 both. What do you mean by both?

10 A. At the special courses weapon school,
11 there are a wide variety of small arms consistent
12 with used by militaries and insurgent forces around
13 the world. And we learn all of them.

14 Q. Do you know what an AK-47 is?

15 A. I do.

16 Q. What is it?

17 A. Timofeyevich Kalashnikova the AK-47 was
18 developed as a very common small arm utilizing
19 7.62x39 cartridge that was developed by Kalashnikov
20 as a Soviet arms following World War II.

21 It is very ubiquitous around the
22 world, including the United States.

23 Q. And you would understand what I mean if
24 I referred to an AK-type rifle?

1 MR. BRADY: Objection. Vague.

2 THE WITNESS: You and I might have great
3 discussion of what is an AK-type rifle. I would
4 have to see what you are referring to in order to
5 determine, in my experience, whether it is truly an
6 AK-type rifle.

7 BY MR. TRESNOWSKI:

8 Q. What do you understand an AK-type rifle
9 to be?

10 A. An AK-47 or one of the variants of the
11 AK-47.

12 Q. In your combat experience, did you see
13 AK-type rifles?

14 MR. BRADY: Objection. Vague.

15 THE WITNESS: Yes.

16 BY MR. TRESNOWSKI:

17 Q. Did you ever see anyone wounded by an
18 AK-type rifle?

19 A. Yes.

20 Q. And how did you know that they were
21 wounded by an AK-type rifle rather than another
22 rifle?

23 A. Well, participation on the battlefield
24 tends to be fairly direct. And you know what they

1 are wielding. You know what you have. And when
2 you recover a person, they tend to have their
3 weapons there.

4 Q. Can you describe the wound caused by
5 AK-type rifle?

6 MR. BRADY: Objection. Vague. Calls for
7 speculation.

8 THE WITNESS: I'm not much on medical. I can
9 only give you my thoughts based on what I observed.
10 BY MR. TRESNOWSKI:

11 Q. We discussed a little earlier that you,
12 in addition to your military service, you served as
13 a police officer?

14 A. Yes.

15 Q. When did you become a police officer?

16 A. 27th of August of 1979.

17 Q. Was that while you were still in school
18 for you bachelor's degree?

19 A. Yes.

20 Q. And what police department did you join
21 in 1979?

22 A. The Ogden, Utah Police Department.

23 Q. And you remained a police officer with
24 that department until when?

1 A. I retired first time in 2011, and I was
2 brought back in 2017. And retired again in 2021.

3 Q. Why did you first retire in 2011?

4 A. I just thought it was a good time to
5 retire.

6 Q. Did anything prompt you to think it was
7 a good time to retire?

8 A. I just thought it was a good time for me
9 to retire.

10 Q. Any -- no particular reason family
11 reason or anything like that?

12 A. No. I had 32 years in and a good time
13 to retire.

14 Q. Was there any particular incident as
15 part of your police officer service that caused you
16 to start considering retirement?

17 A. No.

18 Q. Why did you decide to rejoin the
19 department, then?

20 A. I retired as an assistant chief. I was
21 offered the chief's job after I retired, and I
22 decided to take it.

23 Q. So you retired in 2011. At what point
24 were you then offered a job to return?

1 A. January of 2017.

2 Q. And you decided to take that job?

3 A. I did.

4 Q. Why?

5 A. Because I felt being chief of police was
6 a good way to capital on a career in law
7 enforcement.

8 Q. Did the department reach out to you in
9 regard to the chief of police job, or did you
10 apply?

11 A. The department reached out to me.

12 Q. Did your experience as a police officer
13 inform your opinions about firearms?

14 A. Yes.

15 Q. How so?

16 A. The training in use of firearms. I
17 became a firearms instructor certified by police
18 officer standards and training by the State of
19 Utah. I was appointed firearms instructor by my
20 department. I was a firearms instructor for a
21 number of years. I also supervised the firearms
22 program. And I utilized a wide variety of firearms
23 in my law enforcement career.

24 Q. Did you ever see an AR-15 in the course

1 of your police service?

2 A. Yes.

3 MR. BRADY: Objection. Vague.

4 THE WITNESS: Yes.

5 BY MR. TRESNOWSKI:

6 Q. What is an AR-15?

7 A. AR-15 originally designed by Eugene
8 Stoner in terms of a weapon for the U.S. military.
9 In the 1950s continuing forward, it became very,
10 very popular as a sporting rifle. Very, very
11 popular as a defensive rifle. Very, very popular
12 for recreational use.

13 There are many variants used by
14 both military and law enforcement and by many
15 support and recreational in self-defense.

16 Q. Would you agree -- would you refer to
17 those AR variants as an AR-type rifle?

18 A. Yes.

19 Q. As a police officer, did you ever see
20 anyone wounded by a firearm?

21 A. Yes.

22 Q. Did you ever see anyone killed by a
23 firearm?

24 A. Yes.

1 Q. Did you ever see anyone wounded by an
2 AR-type rifle?

3 A. Yes.

4 Q. And how did you know that it was an
5 AR-type rifle that was used?

6 A. It was either at the crime scene, or it
7 was employed by one of my officers.

8 Q. Any other way of identifying that it was
9 an AR-type rifle?

10 MR. BRADY: Objection. Vague.

11 THE WITNESS: Defined specific cases at crime
12 scenes. When you follow up and you can often
13 identify that, it is an AR-type rifle.

14 BY MR. TRESNOWSKI:

15 Q. Any other way?

16 A. Not off of the top of my head.

17 Q. Did you ever see a .50-caliber rifle in
18 your police service?

19 A. Yes.

20 Q. When did you see that?

21 A. My department had one for use in
22 specific organizations, specific activities.

23 Q. What activities did your department use
24 it for?

1 A. Tactical team, S.W.A.T.

2 Q. Did you ever see a civilian use a
3 .50-caliber rifle as part of your police service?

4 MR. BRADY: Objection. Vague.

5 THE WITNESS: Yes.

6 BY MR. TRESNOWSKI:

7 Q. And when was that?

8 A. Some departments trained with them. And
9 also at recreational events, shooting events.

10 Q. Did you attend those recreational events
11 as part of your duties as a police officer?

12 A. Yes, consistent with assignment there to
13 either participate or to teach or to observe.

14 Q. Outside of the event context, did you
15 see a civilian with a 50-caliber rifle?

16 MR. BRADY: Objection. Vague.

17 THE WITNESS: No.

18 BY MR. TRESNOWSKI:

19 Q. Did you serve on the Ogden City Police
20 S.W.A.T. team?

21 A. I did.

22 Q. What is the "S.W.A.T." team?

23 A. "Special Weapons And Tactics."

24 It's a specialized unit designed

1 to handle specific problems that are considered
2 beyond the scope of a normal police response.

3 Q. And what sort of problems did the
4 S.W.A.T. team respond to?

5 A. Hostage situations, barricaded by
6 criminal situations, armed confrontations, personal
7 security details, or witness protection or personal
8 protection during specific events. Those kinds of
9 things.

10 Q. How frequently was the S.W.A.T. team
11 called to an incident?

12 A. Probably twice a month minimum. We also
13 trained twice a month.

14 Q. As a member of the S.W.A.T. team, did
15 you ever respond to a situation in which an AR-type
16 rifle was being used?

17 MR. BRADY: Objection. Vague. Incomplete
18 hypothetical.

19 BY MR. TRESNOWSKI:

20 Q. You can go ahead and answer.

21 THE WITNESS: Yes.

22 BY MR. TRESNOWSKI:

23 Q. What was -- how many times?

24 A. I could not even begin to guess. Up to

1 or -- that is just too difficult to come up with.

2 Q. More than ten times where you -- did the
3 S.W.A.T. team respond to incidents in which an AR
4 was being used?

5 MR. BRADY: Objection. Vague.

6 THE WITNESS: Again, that is just hard to
7 decide because all of those situations were firearm
8 cases or involved firearms in some way or were a
9 collection of firearms. And there are a wide
10 variety of firearms in cases.

11 BY MR. TRESNOWSKI:

12 Q. I guess I will be a little more
13 specific.

14 Did you respond to a situation
15 in which an individual was firing an AR-type rifle?

16 A. Yes.

17 Q. Can you describe that situation to me?

18 A. A suspect had either fired or was firing
19 an AR-type rifle at persons.

20 Q. And this was -- when did this happen?

21 A. I have no idea. I can just tell you
22 within the 12 years I served in S.W.A.T., there
23 were cases like that.

24 Q. But you don't know how many cases?

1 A. I do not.

2 Q. Do you keep any records of your
3 observations you make about firearms?

4 A. No.

5 Q. Are all police officers qualified to
6 provide expert testimony regarding firearms they
7 use on their job?

8 MR. BRADY: Objection. Vague. Calls for
9 speculation.

10 THE WITNESS: I don't know.

11 BY MR. TRESNOWSKI:

12 Q. Are you qualified to provide expert
13 testimony in virtue of your service at the police
14 department?

15 A. Yes.

16 Q. Were you ever the subject of a
17 misconduct complaint while serving as a police
18 officer?

19 MR. BRADY: Objection. Vague.

20 THE WITNESS: Not that I can recall.

21 BY MR. TRESNOWSKI:

22 Q. Were you named as a party in a civil
23 lawsuit in connection with your service in the
24 police department?

1 MR. BRADY: Objection. Vague.

2 THE WITNESS: Not that I recall.

3 BY MR. TRESNOWSKI:

4 Q. In addition to your military service and
5 your service and your service at the police you
6 founded a company, correct?

7 A. I did, yes.

8 Q. And when did you found the company?

9 A. 2008.

10 Q. And what is that company?

11 A. A consulting and training company.

12 Q. What is the company called?

13 A. SRW, Inc. -- incorporated.

14 Q. And what does "SRW" stand for?

15 A. Those are my initials.

16 Q. And when you first founded SRW in 2008,
17 how many employees did it have?

18 A. Me.

19 Q. How many employees does it currently
20 have?

21 A. Me. One.

22 Q. At any point between 2008 and today,
23 were there any other employees at SRW?

24 A. I have no employees, and I have not had

1 employees for the company.

2 Q. I'm just going to ask you your role at
3 SRW, but it sounds like your role might be
4 everything that SRW requires. Is that correct?

5 A. That is correct.

6 Q. So describe sort of what are your
7 day-to-day duties required of you at SRW?

8 A. Most of my business is in consulting to
9 businesses in strategic leadership, strategic
10 planning. Helping them become better businesses.
11 Helping them become better organizations and
12 leadership training at all levels of the
13 organization.

14 Another piece of the company is
15 what I'm doing here. Providing expert testimony in
16 various types of cases relating to my training and
17 education, experience and expertise.

18 And then another part of the
19 company is in firearms training. I do a
20 significant amount of firearms training and I
21 subcontract to a couple of other firearm training
22 companies.

23 Q. So it sounds like there's -- tell me if
24 I'm accurately understanding here. There are three

1 sort of components of SRW. There is consulting to
2 business. There's expert testimony. And there is
3 firearm trainings?

4 A. Those are the main areas, yes.

5 Q. And the consulting to business, does
6 that involve consulting regarding firearms?

7 A. Not directly, no.

8 Q. It is more in terms of -- you said
9 leadership training?

10 A. Security. Security processes,
11 leadership, strategic plans, strategic leadership,
12 executive leadership, mid-level leadership.

13 Q. Can you give me an example of the
14 contract you had with the business and what SRW
15 provided?

16 A. Sure. For variety of different clients
17 I provide anywhere from 8 to 40 hours of executive
18 leadership training.

19 Q. Other than consulting services to
20 businesses, expert testimony and firearms training,
21 is there any other services that SRW sells?

22 MR. BRADY: Objection. Misstates testimony.
23 Vague.

24 THE WITNESS: If there is a request for

1 training from a potential client in a specific area
2 and it is something that we might have expertise in
3 or access to expertise in, for instance, we've been
4 training for military units. We've done training
5 for other law enforcement entities.

6 BY MR. TRESNOWSKI:

7 Q. So let me understand that. You provided
8 firearms training for military units?

9 A. Yes.

10 Q. What military units?

11 A. Primarily the Utah Air International
12 National Guard security police units.

13 Q. So you taught international guard?

14 A. Utah Air National Guard.

15 Q. How frequently have you provided
16 services to the Utah Air National Guard?

17 A. That was a one-time contract several
18 years ago.

19 Q. What other military contracts has SRW
20 had?

21 A. We provided -- one time we provided
22 pre-deployment firearms training to the 19th
23 Special Forces Support Company, as I recall.

24 Q. What else?

1 A. That is about it that I can recall right
2 now.

3 Q. What is Warrior Creed?

4 A. Warrior Creed is the firearm's side of
5 SRW.

6 THE COURT REPORTER: I didn't hear the end of
7 that answer. Can you finish that answer?

8 THE WITNESS: Would you like me to repeat the
9 answer?

10 THE COURT REPORTER: Sure. Can you speak up,
11 please? Thanks.

12 THE WITNESS: Warrior Creed is the firearms
13 training -- civilian firearm's training side of
14 SRW, Incorporated.

15 BY MR. TRESNOWSKI:

16 Q. So Warrior Creed is a brand name under
17 SRW?

18 A. Yes.

19 Q. And Warrior Creed -- I think I know the
20 answer, but how many employees does Warrior Creed
21 have?

22 A. None. Just me.

23 Q. And you are a firearm's trainer in
24 connection with Warrior Creed?

1 A. Yes.

2 Q. And there are additional firearms
3 trainers through Warrior Creed, correct?

4 A. Yes.

5 Q. But they are not SRW employees?

6 A. No.

7 Q. Can you explain how that works?

8 A. 1099 contractors.

9 Q. I know SRW was 2008, but when did
10 Warrior Creed brand begin?

11 A. Roughly the same time.

12 Q. Does Warrior Creed SRW own property?

13 MR. BRADY: Objection. Vague.

14 THE WITNESS: We own training equipment and
15 related items.

16 BY MR. TRESNOWSKI:

17 Q. Do you own a facility?

18 A. No.

19 Q. That first year that Warrior Creed
20 offered firearms training services in 2008, how
21 many customers did you have?

22 A. In 2008 or since 2008?

23 Q. In 2008.

24 A. I don't recall.

1 Q. Roughly -- I just want to get a sense --
2 how many training courses did you offer in the
3 first year of SRW?

4 A. I don't recall in 2008 how many we
5 offered. Specifically and similar to -- I mean
6 there hasn't been a great deal of change. So
7 similar is probably 20 courses per year.

8 Q. How many customers did you have in the
9 year 2023, approximately?

10 MR. BRADY: Objection. Vague.

11 BY MR. TRESNOWSKI:

12 Q. That was unclear. In calendar year
13 2023, approximately how many customers did Warrior
14 Creed have?

15 MR. BRADY: Objection. Vague.

16 THE WITNESS: Several hundred.

17 BY MR. TRESNOWSKI:

18 Q. So you started a business from 2008 and
19 you had several hundred customers last year,
20 correct?

21 MR. BRADY: Objection. Misstates testimony.
22 Vague.

23 THE WITNESS: Yes.

24 BY MR. TRESNOWSKI:

1 Q. And what did you do to grow the Warrior
2 Creed business?

3 MR. BRADY: Objection. Misstates the
4 testimony. Vague.

5 THE WITNESS: Essentially exploited my name
6 and my experience.

7 BY MR. TRESNOWSKI:

8 Q. I'm not sure I heard. You said
9 "exploited" your name?

10 A. I'm sorry?

11 Q. I'm sorry. Exploited your name?

12 A. Exploited my name. Turned my name and
13 my experience into a brand.

14 Q. And what do you mean by that?

15 A. I'm well known in the firearms
16 community, have been for years. People seek out my
17 training.

18 Q. What are you well known for?

19 A. I'm known to be a highly competent
20 firearms trainer.

21 Q. How do you refer to Warrior Creed's
22 customers?

23 MR. BRADY: Objection.

24 BY MR. TRESNOWSKI:

1 Q. Clients? Go ahead.

2 A. Correct.

3 Q. So if an individual comes to Warrior
4 Creed for firearms training, do you refer to them
5 as a client?

6 A. I do.

7 Q. Okay. How many clients -- how do
8 clients find Warrior Creed?

9 MR. BRADY: Objection. Calls for speculation.

10 THE WITNESS: Our primary methods are word of
11 mouth and internet. We have a website. And that
12 is about it.

13 BY MR. TRESNOWSKI:

14 Q. Do you have an understanding of what
15 percentage comes to you word of mouth and what
16 percentage comes through the internet?

17 A. I do not.

18 Q. Does Warrior Creed advertise outside of
19 its website?

20 A. We have business cards available at some
21 of the firearms training locations that we utilize.
22 And we have business cards and similar type things
23 at a couple of primary firearms stores. That is
24 about it.

1 Q. And where does Warrior Creed provide
2 services to clients?

3 A. On range facilities.

4 Q. Where are those range facilities?

5 A. Primarily there is one here in Utah that
6 we lease on a regular basis and then wherever our
7 clients have requested our training, we arrange for
8 a facility to teach them on.

9 Q. In 2023, where other than Ogden, Utah,
10 did you provide services to clients?

11 A. Paulden, Arizona. Nunn, Colorado
12 -- N-U-N-N, Colorado. That is all I can think of
13 last year.

14 Q. So when you travel to somewhere like
15 Colorado to provide services, does the group
16 contact you?

17 A. Yes. Somebody seeks out training and
18 contacts us.

19 Q. When you say "somebody," it is not just
20 one person?

21 A. No. It is a wide variety of people.

22 Q. I'm just confused. So you show up to
23 Colorado and there is a group of people there
24 receiving firearms training?

1 A. So a point person in Colorado says, "I'd
2 like to host a class from you." And we say, "This
3 is what it costs. You need to provide just
4 facilities. You need to insure students." And
5 they do that.

6 Q. And those individuals that are contracts
7 outside of Utah, do they tend to be businesses?

8 A. Many firearms trainers or people who
9 host this have their own business, yes.

10 Q. Was it like a store who hired you to
11 bring it in to offer you training?

12 A. It is usually another firearms training
13 company.

14 Q. Where do most of your clients live?

15 MR. BRADY: Objection. Calls for speculation.

16 THE WITNESS: Most are divided into groups in
17 Utah.

18 BY MR. TRESNOWSKI:

19 Q. Do your clients tend to be any
20 particular age?

21 A. No. They cross all demographics.

22 Q. Do your clients tend to be any
23 particular gender?

24 A. They cross all demographics.

1 Q. How much does a typical course at
2 Warrior Creed cost?

3 A. An eight-hour course is \$175.00.

4 Q. Do you understand that to be typical for
5 a firearms course?

6 A. In the industry?

7 Q. Yes.

8 A. The industry pricing is quite broad.
9 That is typical for Warrior Creed.

10 Q. Do you have repeat customers?

11 A. Yes.

12 Q. Do you collect any data to understand
13 why someone might be a repeat customer?

14 A. Well, specific data? No.

15 Q. Do you have an understanding of why
16 somebody might be a repeat customer?

17 A. I would have to think customer
18 satisfaction plays a role in why they would be a
19 repeat customer.

20 Q. Do you generally find your clients are
21 satisfied?

22 A. Yes.

23 Q. Why do you think that is?

24 A. I'm sorry?

1 Q. Why could do you think that is?

2 MR. BRADY: Objection. Calls for speculation.

3 THE WITNESS: They usually express some degree
4 of happiness in having attended the training.

5 BY MR. TRESNOWSKI:

6 Q. Does Warrior Creed work for private
7 businesses?

8 A. Warrior Creed specifically? SRW is the
9 company that contracts for specific training.

10 Q. Did SRW provide services to Israeli
11 Weapons System?

12 A. I provide -- independently provide my
13 services to Israeli Weapons Industries, IWI.

14 Q. So let me restate that. You personally
15 provide services to IWI; correct?

16 A. I do.

17 Q. And what is "IWI"?

18 A. "Israeli Weapons Industries."

19 Q. What does IWI do?

20 A. IWI is the sales and training
21 component -- the U.S. sales and training component
22 of Israeli Weapons Industries out of Israel.

23 They manufacture specific
24 firearms and they train people in the use of those

1 firearms.

2 Q. And what did you do for them?

3 A. I do training classes when asked, when
4 contracted with in the use of specific carbines.

5 Q. And in the use of carbines manufactured
6 by IWI?

7 A. Correct.

8 Q. How many times have you provided those
9 services to IWI?

10 A. I've only talked to them two or three
11 times. This is relatively new. I think we've only
12 been with them for a couple of years.

13 Q. You said it's relatively new. When did
14 you first provide services to IWI?

15 A. Two years ago.

16 Q. 2022?

17 A. That sounds right.

18 Q. And then IWI pays you individually for
19 providing those services?

20 A. IWI contracted -- initially contracted
21 with another firearms training facility who employs
22 me, and that is who paid me initially and then in
23 2023, IWI paid me.

24 Q. What were the terms of that financial

1 arrangement with IWI?

2 MR. BRADY: Objection. Vague.

3 THE WITNESS: Contract base for a two-day
4 training event.

5 BY MR. TRESNOWSKI:

6 Q. And what were you paid?

7 A. I don't recall.

8 MR. TRESNOWSKI: Okay. I think I could use a
9 quick bathroom break. Five minutes work? Okay.
10 We will be back here at 10:35 central time.

11 (Recess.)

12 MR. TRESNOWSKI: Let's go back on the record.

13 BY MR. TRESNOWSKI:

14 Q. Randy, you know even though we took a
15 break you still remain under oath, correct?

16 A. Correct.

17 Q. How many classes total did you provide
18 in connection with the IWI contract?

19 A. I think I've done two so far.

20 Q. And who were the students in these
21 courses?

22 A. Whoever IWI signs up for their classes.
23 There are a broad range of people, civilians, law
24 enforcement and military.

1 Q. Where were the classes offered?

2 A. One was in Paulden, Arizona, and -- both
3 -- excuse me. Both were in Paulden, Arizona.

4 Q. So are these individuals who have
5 purchased an IWI firearm and then purchased a class
6 in connection with it?

7 MR. BRADY: Objection. Calls for speculation.

8 THE WITNESS: They contract with a class with
9 IWI. IWI then asks me to go teach.

10 BY MR. TRESNOWSKI:

11 Q. So do you have any understanding how
12 these students find this class?

13 A. Through IWI.

14 Q. And did you provide anything exclusively
15 on IWI weapons?

16 A. I provide training on IWI firearms. The
17 students show up with mostly IWI firearms. If they
18 show up with something else, they still go through
19 the training.

20 Q. What firearms in particular did you
21 provide training with?

22 MR. BRADY: Objection. Vague.

23 THE WITNESS: Based upon the IWI Tavor
24 training, T-A-V-O-R.

1 BY MR. TRESNOWSKI:

2 Q. Any others?

3 A. That is what I teach.

4 Q. And what skills do you teach in
5 connection with that firearm?

6 A. I'm sorry. I didn't hear you.

7 Q. What skills do you teach in connection
8 with that firearm?

9 A. The use of the firearm. How to be safe
10 with it. How to shoot and handle it well.

11 Q. Anything else?

12 A. No.

13 Q. You mentioned three categories of
14 students, civilians, law enforcement and military,
15 correct?

16 A. Yes.

17 Q. Do you provide any specific training on
18 how to use that firearm for law enforcement
19 purposes?

20 A. Not specifically. I teach a program and
21 the students attend that program.

22 Q. Same question for the military. Do you
23 provide any training specifically for how that
24 firearm is to be used in the military?

1 MR. BRADY: Objection. Vague.

2 THE WITNESS: Are we still speaking about IWI
3 firearm?

4 BY MR. TRESNOWSKI:

5 Q. Correct.

6 A. I teach a specific program of
7 instruction and that is what the students receive
8 regardless of their background.

9 Q. Do you have any understanding, if any,
10 of your students served in the Israeli military?

11 A. I don't -- I don't recall ever having
12 taught anyone in a student capacity in the Israeli
13 military.

14 Q. You added the phrase "civilian
15 capacity." Did you train anyone in the military
16 capacity of the Israeli military?

17 MR. BRADY: Objection. Misstates testimony.
18 Vague.

19 THE WITNESS: Not that I recall. I was just
20 referring to my general training.

21 BY MR. TRESNOWSKI:

22 Q. Just to be clear, you did not provide
23 any services for IWI in Israel, correct?

24 A. No, no.

1 Q. Is that firearm, the IWI Tavor carbine,
2 used by the Israeli military?

3 A. Yes. In a military variant.

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

5 A. The military variant is not available in
6 the United States.

7 Q. And what is the distinction between a
8 military and nonmilitary variant?

9 A. The same as with the AR variants versus
10 the military ARs.

11 Select fire is not available on
12 the ARs or typical carbine in the United States.
13 That is distinctly a military capacity.

14 Q. Would you refer to the IWI Tavor carbine
15 as an AR-type rifle?

16 A. No.

17 Q. Why not?

18 A. The Tavor carbine is what is known as a
19 bullpup design.

20 Q. Can you say that again? I didn't quite
21 hear?

22 A. The AR -- the Tavor carbine is known as
23 a bullpup design.

24 Q. Are there any other differences we

1 haven't discussed between the military variants and
2 the civilian variants in the IWI firearm that you
3 provided?

4 MR. BRADY: Objection. Calls for speculation.
5 Vague.

6 THE WITNESS: Not that I'm aware of. That is
7 the primary difference.

8 BY MR. TRESNOWSKI:

9 Q. Same with the AR platform rifles. You
10 provided testimony that the distinction between an
11 AR platform rifle and a military version is select
12 fire. Is that correct?

13 A. Primarily, yes.

14 Q. Have you recorded any videos in
15 connection with your work with SRW?

16 A. You mean commercially?

17 Q. Any videos? Have you recorded videos in
18 connection with your working at SRW?

19 A. I'm sure I have, yes.

20 Q. I am going to try to introduce one such
21 video as an exhibit here.

22 So I'm going to share my screen,
23 and I'm going to show a YouTube video here.

24 Okay. On your screen do you see

1 a YouTube video?

2 A. I do.

3 MR. TRESNOWSKI: I'm going to mark this
4 YouTube video as Exhibit 1. And I'm also going to
5 share a screenshot later. So I'm not going to read
6 the URL into the record because it will be on a
7 later exhibit. But just to identify for the
8 record, Exhibit 1 is titled "Training with Randy
9 Watt," posted by the account Impact Guns.

10 It is three minutes and five
11 seconds long. It was posted on June 25th, 2013.
12 It has a description on the video of Colonel Randy
13 Watt training demonstration.

14 (Exhibit 1 was marked for
15 identification.)

16 BY MR. TRESNOWSKI:

17 Q. Do you recognize this YouTube video from
18 what we know about it already?

19 A. I do not.

20 MR. BRADY: Objection. For the record, there
21 is a blank screen. All there is is the title
22 showing.

23 (Video playing.)

24 BY MR. TRESNOWSKI:

1 Q. Do you know what Impact Guns is?

2 A. I do.

3 Q. What is Impact Guns?

4 A. It is a company that sells firearms and
5 related supplies.

6 Q. Did you provide services for Impact
7 Guns?

8 A. No.

9 Q. Do you remember recording a video with
10 Impact Guns?

11 A. No.

12 Q. Do you have any understanding of why
13 Impact Guns posted a video called training with
14 Randy Watt?

15 MR. BRADY: Objection. Calls for speculation.

16 BY MR. TRESNOWSKI:

17 Q. Go ahead. You can answer.

18 A. Yes. They are the largest gun store in
19 my area and the largest private gun store in my
20 area, nonchain, and I've known them for years, and
21 I've purchased firearms from them over the years.

22 I do not recall ever doing --
23 no, wait. Way back I might have done a training
24 event at their school. They have a range in their

1 store. I might have done training for them. That
2 is the best I can recall.

3 Q. I'm going to play the video. I'm going
4 to play the beginning of it.

5 The audio on this video is just
6 music, but I want to make sure.

7 (Video playing.)

8 BY MR. TRESNOWSKI:

9 Q. Can you hear the audio?

10 A. I am not hearing any audio.

11 Q. Okay. I'm going to play the audio.

12 (Video playing.)

13 BY MR. TRESNOWSKI:

14 Q. All right.

15 Randy, were you able to see that
16 video on your screen?

17 A. Yes, I was.

18 Q. Did that video show you?

19 A. Yes it did.

20 Q. After seeing the video, do you remember
21 filming it?

22 A. Yes I do.

23 Q. Do you remember when you filmed this
24 video?

1 A. I don't remember what year exactly.
2 That is not Impact Guns video. That is a marketing
3 video that we did, that my company did. That my
4 company did. It was way back. It would have been
5 -- it was before 2013?

6 Q. You mentioned you were the only SRW
7 employee so you contracted with someone to create
8 this video?

9 A. Yes.

10 Q. Do you remember who filmed it?

11 A. I do not. That was a long time ago. I
12 do not. I'm not even sure who -- that facility
13 that was taken -- for the majority where it was
14 taken, from no longer exists.

15 Q. I have some questions about the video
16 that I'm going to ask in the form of screenshots.

17 Can you see my screen?

18 A. Yes.

19 Q. Okay. I'm marking this as Exhibit 2.

20 (Exhibit 2 was marked for
21 identification.)

22 BY MR. TRESNOWSKI:

23 Q. This is a screenshot of the YouTube
24 video we just watched, and the URL for the YouTube

1 video, which just ends Q2Q. It was the same URL
2 that was in Exhibit 1, and this is a screenshot of
3 that video at four seconds.

4 What is the company name shown
5 on the screen shot?

6 A. SRW, Inc.

7 Q. And that is your company, correct?

8 A. That is correct.

9 Q. And that is because it was your company
10 that created this video, correct?

11 A. Correct.

12 Q. I'm going to mark as Number 3, another
13 screenshot from that same video with the same URL.

14 (Exhibit 3 was marked for
15 identification.)

16 BY MR. TRESNOWSKI:

17 Q. At the top of the screenshot shows 34
18 seconds in the video. Do you see that screenshot,
19 Randy?

20 A. I do.

21 Q. Do you remember seeing this image when
22 we watched the video?

23 A. Yes.

24 Q. Does this show you?

1 A. Yes.

2 Q. Is this actual footage of you teaching a
3 firearms class?

4 A. Yes.

5 Q. Where is this -- was this video taken?

6 A. This is at the what is now the Weber
7 County sports shooting complex in Ogden, Utah.

8 Q. Does Warrior's Creed typically provide
9 services at that doing that?

10 A. Yes.

11 Q. From looking at this video do you have
12 an understanding of what course you might be
13 teaching here?

14 A. This is one of the pistol courses.

15 Q. So Exhibit 4 is the screenshot of that
16 video at the 49 second mark.

17 (Exhibit 4 was marked for
18 identification.)

19 BY MR. TRESNOWSKI:

20 Q. Do you see this video?

21 A. No.

22 Q. Do you see this image?

23 A. No.

24 Q. Oh, I didn't share it yet. Sorry.

1 Do you see the image on your
2 screen?

3 A. I do.

4 Q. What is this?

5 A. This is a marketing video of one of the
6 self-defense related classes we teach.

7 Q. And what class is that?

8 A. Well, there are a whole series of
9 classes that we teach, specifically to civilians
10 and how to protect themselves.

11 Q. Can you tell from this video which class
12 this may be footage from?

13 A. I can't. It is just a, you know,
14 related-public activity related to using the ATM.

15 Q. This is an image of you in this video,
16 correct?

17 A. Correct.

18 Q. And what is this particular scenario
19 this image depict?

20 A. Defending yourself from an armed a
21 assailant at an ATM.

22 Q. Is that a scenario you discuss
23 frequently in your courses?

24 A. Yes.

1 Q. Why do you frequently discuss that
2 scenario?

3 A. Because a significant number of people
4 tend to be victimized at ATMs.

5 Q. So one of the goals of your course is to
6 prepare students for such a scenario?

7 A. Correct.

8 Q. What are you holding in this image?

9 A. I'm sorry?

10 Q. What are you holding in this image?

11 A. I'm holding a converted M-9 pistol.
12 Converted to utilize paint marking rounds, training
13 rounds specifically.

14 Q. Can you explain what that conversion
15 process looks like?

16 A. Yes. You replace the standard barrel
17 with this barrel, which fires specific subunits.

18 Q. So you train your students on it. It's
19 an otherwise normal M-9 pistol, but you have made
20 one conversion to it?

21 A. Yes.

22 Q. I'm going to pull up another exhibit
23 marking as Exhibit 5.

24

1 (Exhibit 5 was marked for
2 identification.)

3 BY MR. TRESNOWSKI:

4 Q. Another image from a YouTube video. It
5 has the same URL at the end, Q2Q. The last three
6 letters has the trainer Randy Watt. And this is at
7 1:14 of the YouTube video.

8 Can you see this image, Randy?

9 A. I can.

10 Q. Is this you in this image?

11 A. It is.

12 Q. Can you explain what this image shows?

13 A. I'm demonstrating the use of a civilian
14 market AR-15 in a standard training position known
15 as barricade shooting.

16 Q. Do you have an understanding from this
17 image which variant the AR-15 you are holding?

18 A. You mean who the manufacturer?

19 Q. Correct.

20 A. I believe was specialized tactical
21 systems AR-15.

22 Q. And you said you were training on a
23 particular scenario here, correct?

24 A. This particular training, shooting

1 around barricades and obstacles. Very popular in
2 the sporting world as well as training in the
3 self-defense world.

4 Q. So one skill you teach your students is
5 how to shoot around barricades and obstacles?

6 A. Correct.

7 Q. Is there a particular self-defense
8 scenario this image depicts?

9 MR. BRADY: Objection. Vague.

10 THE WITNESS: Sure. I mean it teaches them
11 how to shoot around barriers and obstacles.

12 BY MR. TRESNOWSKI:

13 Q. What were you wearing in this image?

14 A. I'm wearing the ballistics helmet. I'm
15 wearing some carry gear designed specifically
16 around the civilian AR-15 platform that I'm using.
17 And I'm wearing a camouflage-style hat and shirt as
18 well as hearing protection and eye protection.

19 Q. Would you describe the clothes you are
20 wearing as militaristic?

21 MR. BRADY: Objection. Vague. Argumentative.

22 THE WITNESS: Sure. You can call them
23 militaristic.

24 BY MR. TRESNOWSKI:

1 Q. Is the equipment you're wearing in this
2 image similar to the equipment you would wear
3 during military service?

4 A. No.

5 Q. Why not?

6 A. This is civilian stuff built around the
7 sport world. And the stuff I wore was issued -- in
8 the military it was issued.

9 Q. So is it your testimony that this is an
10 image of you wearing civilian gear?

11 A. Yes.

12 Q. As part of your self-defense courses do
13 you instruct students on how to wear the gear you
14 are wearing in this image?

15 A. I don't recall ever teaching a class on
16 that. I mean people show up with gear to attend
17 certain classes.

18 Q. In which classes do students tend to
19 show up with gear?

20 A. Any of the tactical classes.

21 MR. TRESNOWSKI: Okay. Marking as Exhibit 6
22 another screen shot of the YouTube video we looked
23 at earlier.

24

1 (Exhibit 6 was marked for
2 identification.)

3 BY MR. TRESNOWSKI:

4 Q. This is a screenshot from a minute 18 of
5 the video. It's the same video titled training
6 with Randy Watt that we watched the YouTube video.

7 Randy, can you see this image?

8 A. I can.

9 Q. What is this image?

10 A. This is a piece of that marketing --
11 training/marketing video that you're playing, and
12 it shows pretty much the same thing, shooting
13 around obstacles. And these two people are
14 shooting around an obstacle.

15 Q. And the individual shown in this video,
16 is that one of your clients?

17 MR. BRADY: Objection. Vague.

18 THE WITNESS: Yes.

19 BY MR. TRESNOWSKI:

20 Q. There are two individuals in this image.
21 The individual in the center of the image who is
22 holding the firearm, is that one of your clients?

23 A. Yes, it is.

24 Q. And what is your client holding in this

1 image?

2 A. He is holding a civilian and a
3 sporterized AR-15.

4 Q. And what equipment is your client
5 wearing?

6 A. It looks like he has got a backpack on,
7 and it looks like a Pro-Tec helmet, which is a
8 climbing helmet kind of thing, and it might be one
9 of the high-tech ballistic helmets. I don't
10 recall. And it looks like he has some AR-15
11 magazine holders up on his side.

12 Q. From this image do you have an
13 understanding of what skills you might be teaching
14 this client?

15 A. This was a marketing video this was --
16 particularly -- all these scenes are particularly
17 staged. You know, either grabbed from a training
18 scene or staged like this one was to demonstrate
19 the content of a class.

20 Q. Is it an accurate depiction of one of
21 your courses?

22 A. Sure. It is shooting around obstacles
23 and barricades.

24 Q. Is there a particular -- strike that.

1 Do you advise your clients to wear helmets when
2 training on how to shoot around obstacles?

3 A. I don't do classes on the wear of gear
4 or the type of gear.

5 Again, clients show up with
6 certain things. With certain pieces of equipment.
7 And in this case, this was staged. But he would
8 have come with the equipment that he had for this
9 event.

10 Q. Do you have an understanding of why it
11 was staged and the way it was?

12 A. Yes. We wanted to show that we conduct
13 training with civilian model AR platforms in terms
14 of shooting around barricades and obstacles. It is
15 part of the training that we conduct.

16 Q. Was there anything you were trying to
17 show with the selection of the clothing worn in
18 this image?

19 MR. BRADY: Objection. Misstates testimony.
20 Vague.

21 THE WITNESS: No. It had nothing to do with
22 that.

23 MR. TRESNOWSKI: I'm going to mark as Exhibit
24 7, another screenshot from that same YouTube video.

1 This one is at 46 seconds.

2 (Exhibit 7 was marked for
3 identification.)

4 BY MR. TRESNOWSKI:

5 Q. Do you see this video, Randy?

6 A. I do.

7 Q. Do you see this image, Randy?

8 A. I see the image, yes.

9 Q. Is this you?

10 A. It is.

11 Q. What are you doing in this image?

12 A. In this image I'm defending against a
13 carjacking.

14 Q. Is that a scenario that you discuss in
15 your courses?

16 A. It is.

17 Q. Why?

18 A. Because a lot of people get carjacked
19 these days and have been for a number of years.

20 Q. And what are you holding in this image?

21 A. I'm holding, again, a -- this is a Glock
22 Model 17 converted firearm. Again, converted to
23 fire the noninjurious submunitions.

24 MR. TRESNOWSKI: One more screenshot I'm going

1 to mark as Exhibit 8, another screenshot from the
2 YouTube video. This is the same URL as before, and
3 it ends with the three letters Q2Q, and this is
4 moved to one minute 59 seconds in that same YouTube
5 video.

6 (Exhibit 8 was marked for
7 identification.)

8 BY MR. TRESNOWSKI:

9 Q. Randy, do you see this image?

10 A. I do.

11 Q. Do you know who this is in this image?

12 A. I know both of these people, yes.

13 Q. Who are they?

14 A. So the one on the left is a former Ogden
15 police officer, and the one in the protective gear
16 is a former Ogden police officer.

17 Q. What does this image show?

18 A. This image shows the woman defending
19 herself against home invasion.

20 Q. Is that a scenario you discuss in your
21 courses?

22 A. This is. It is.

23 Q. And why?

24 A. Because people, and significantly woman,

1 are often victims of home invasions.

2 Q. And what is the woman on the left
3 holding in this image?

4 A. That is the same firearm that I was
5 holding in the previous image. It's a Glock Model
6 17 that has been converted to use with subunits.

7 Q. Is that firearm useful in this scenario
8 depicted in this image?

9 A. I'm sorry. Is that firearm what?

10 Q. Useful in the scenario depicted in this
11 image?

12 MR. BRADY: Objection. Vague.

13 THE WITNESS: Keep in mind this is a marketing
14 video provided to sell the training program, so I
15 would say.

16 BY MR. TRESNOWSKI:

17 Q. Why?

18 A. Because it shows a woman defending
19 herself from a home invader.

20 Q. You mentioned these images are from a
21 marketing video. Do you remember what you did with
22 this video?

23 A. I really don't, and we put this
24 together. We didn't do much with it. I don't --

1 other than with Impact Guns using it, I don't
2 recall it ever being much -- it might have been on
3 our website at one point. I don't believe it is
4 still, but I may be wrong. I will have to check.

5 Q. Do you agree this video -- strike that.

6 Does this video accurately
7 depict one of your courses?

8 MR. BRADY: Objection. Vague.

9 THE WITNESS: It depicts some of the training
10 that people can get from us in our training
11 courses.

12 BY MR. TRESNOWSKI:

13 Q. And this video is from 2013. But do you
14 still provide the type of training that is shown in
15 this video?

16 MR. BRADY: Objection. Vague.

17 THE WITNESS: So I don't remember if the video
18 was from 2013. Impact guns may have put it up in
19 2013. I just don't recall if we did it in 2013.
20 And yet some of the training is still available.
21 It just depends on what courses people sign up for.

22 This facility that you see us
23 using there no longer exists, so it makes some of
24 the training hard to conduct.

1 BY MR. TRESNOWSKI:

2 Q. You mentioned earlier that Warrior Creed
3 has a website, correct?

4 A. Yes.

5 Q. And are you responsible for the content
6 on that website?

7 A. I have a contractor who manages my
8 website.

9 Q. Do you work with the contractor to
10 decide what goes on the website?

11 A. Sure.

12 Q. And is the URL for your website
13 warriorcreed.us?

14 A. That is correct.

15 Q. I'm going to introduce an Exhibit 9
16 here. Exhibit 9 -- I'm marking as Exhibit 9
17 screenshot that I took of the warriorcreed.us
18 website.

19 (Exhibit 9 was marked for
20 identification.)

21 BY MR. TRESNOWSKI:

22 Q. If you go to the bottom of this
23 three-page exhibit, it has the URL warriorcreed.us
24 about 4 -- it is 3 pages.

1 Randy, do you want me to scroll
2 through these 3 pages so you can see what it is?

3 A. No. I know what it is.

4 Q. What is this?

5 A. In 2007 coming out of Bagdad, I wrote
6 what is called "One Warrior's Creed." And then
7 below it is the explanation of the contents of that
8 poem.

9 Where the name Warrior Creed
10 comes from. It is based on this creed.

11 Q. And this is what shows up when you click
12 about on your website, correct?

13 MR. BRADY: Objection. Calls for speculation.
14 Vague.

15 THE WITNESS: I don't recall. I don't get on
16 the website much. I don't recall exactly what
17 comes up on about.

18 BY MR. TRESNOWSKI:

19 Q. Do you see here that -- here it is in
20 gray?

21 A. Yes, I do.

22 Q. Can you see at the bottom of this
23 printout, it has a URL and the last part of it says
24 about?

1 A. Yes, I do.

2 Q. Were you part of the decision to include
3 this on the Warrior's Creed website?

4 A. I'm sure I was.

5 Q. And why is it included as part of the
6 Warrior Creed website?

7 A. Because it explains where the Warrior's
8 Creed -- or the brand, Warrior's Creed, comes from.
9 This is the poem.

10 Q. And is this Warrior's Creed part of the
11 curriculum you teach your students?

12 A. "One Warrior's Creed" is a poem that I
13 wrote coming out of combat in Baghdad in 2007. And
14 explains the contents of that poem, why I wrote it.

15 I don't specifically teach
16 Warrior's Creed. It is available to people.

17 At one time you could -- when we
18 had an online store you could buy the poem if you
19 thought it was relevant. That is about it.

20 Q. I don't think you answered my question.
21 My question is simply why is this on the website.

22 MR. BRADY: Objection. Misstates testimony.
23 Vague, argumentative.

24 THE WITNESS: The brand is Warrior Creed.

1 People wonder where that comes from. It comes from
2 this. The poem called "One Warrior's Creed."

3 BY MR. TRESNOWSKI:

4 Q. Why did you select the brand name
5 Warrior Creed?

6 A. Because I liked it.

7 Q. Is there any particular reason you liked
8 that brand name?

9 A. No. I wrote the poem.

10 Q. It says here "One Warrior's Creed, a
11 philosophy to live with."

12 Did I read that correctly?

13 A. I'm sorry?

14 Q. Did I read that correctly?

15 A. You did.

16 Q. Is one of the objectives of your courses
17 at Warrior Creed to teach a life philosophy?

18 MS. BRADY: Objection. Vague. Asked and
19 answered.

20 THE WITNESS: It's designed to teach a
21 self-defense policy, which would allow you to live
22 when faced with great danger from violent
23 criminals.

24 BY MR. TRESNOWSKI:

1 Q. Does this website or -- scratch that.
2 It does this poem and the description of it here
3 describe the self-defense philosophy you teach in
4 your courses?

5 MR. BRADY: Vague. Asked and answered.

6 THE WITNESS: Yes.

7 MR. TRESNOWSKI: I'm going to introduce as
8 Exhibit 10 another image -- this is another --
9 Exhibit 10 is a screen shot from the Warrior Creed
10 website.

11 (Exhibit 10 was marked for
12 identification.)

13 BY MR. TRESNOWSKI:

14 Q. Do you recognize this, Randy?

15 A. I do.

16 Q. What is it?

17 A. It is a picture of me holding one of my
18 sporterized AR-15s.

19 Q. And does this show up on the Warrior
20 Creed website?

21 A. I believe it does, yes.

22 Q. Do you know where it shows up?

23 A. I think it says "Home." I think this is
24 on the home page.

1 Q. And you said this is an image of you?

2 A. It is.

3 Q. And what firearm are you holding in this
4 image?

5 A. That is a civilian model AR-15.
6 Variants.

7 Q. Can you describe the gear you're
8 wearing?

9 A. I have a police ballistic helmet on,
10 wearing ballistics glasses, which are great for
11 protection when you are shooting. And I'm wearing
12 some type of an all-weather sports training jacket.
13 Very common in the training world.

14 Q. Were you part of the decision to include
15 this image on the Warrior Creed website?

16 A. I'm sure I was.

17 Q. Why did you include this image on the
18 Warrior Creed website?

19 A. Because I like it.

20 Q. And why do you like it?

21 A. Because of the training that is
22 available from us.

23 Q. What training does this show?

24 A. It shows AR-15 civilian Variant carbine

1 training that we offer.

2 Q. Is that training that you offer
3 particularly popular?

4 A. I'm sorry. I lost the last part of your
5 question.

6 Q. Is that training that you offer popular?

7 A. Very popular.

8 The civilian model AR-15 models
9 are very popular, and people like to get trained
10 with them.

11 Q. You mentioned you did contract with
12 someone to make your website?

13 A. Contract with who?

14 Q. Someone to make your website, correct?

15 A. Yes.

16 Q. Do you contract with -- other than that
17 person do you contract with anyone to develop
18 Warrior Creed's marketing?

19 A. No.

20 Q. So you are familiar with warrior creed's
21 marketing?

22 MR. BRADY: Objection. Vague.

23 THE WITNESS: The person that does this stuff
24 manages. She is contracted to do the marketing

1 program which includes the website.

2 BY MR. TRESNOWSKI:

3 Q. You tell her the nature of the marketing
4 materials to create?

5 MR. BRADY: Objection. Vague. Misstates his
6 testimony.

7 THE WITNESS: So I tell her what I'm trying to
8 accomplish. She designs stuff.

9 BY MR. TRESNOWSKI:

10 Q. What do you tell her about what your
11 trying to accomplish with your marketing materials?

12 A. I'm trying to sell training programs in
13 the civilian market.

14 Q. The goal of selling training programs to
15 the civilian market?

16 A. Yes. That is what I do. It is part of
17 my business.

18 Q. How do you use your marketing materials
19 to accomplish that goal?

20 A. I use the website and then students take
21 the courses and they spread the word.

22 Q. Anything else?

23 A. I think I told you earlier I leave
24 business cards in places -- let's see what else. I

1 think we have a Facebook page. Yes we have a
2 Facebook page, and she manages that.

3 Q. And you pick -- well. So the purpose of
4 your marketing is to attract students -- sell?

5 A. To sell courses.

6 Q. In your many years of running SRW have
7 you learned anything about how to attract students
8 to take your courses?

9 A. If you are looking for specific lessons,
10 no. We sell courses. And we -- we get specific
11 students to stay in business, so...

12 Q. Do you think you've been successful in
13 selling courses?

14 A. I'm sorry. I couldn't hear you.

15 Q. You think you've been successful in
16 selling courses?

17 A. Yes, we've been in business since 2008,
18 and it is very tough. Very tough, very demanding.

19 Q. Why do you think you've been so
20 successful?

21 A. Because I have a powerful name in the
22 firearms training industry, and I'm considered an
23 expert in this realm.

24 Q. Does the image on the home page here

1 help show the power of your brand?

2 MR. BRADY: Objection. Vague. Calls for
3 speculation.

4 THE WITNESS: My marketing person would
5 probably say yes.

6 BY MR. TRESNOWSKI:

7 Q. So your marketing person has an
8 understanding of the Randy Watt brand?

9 MR. BRADY: Objection. Vague. Calls for
10 speculation.

11 THE WITNESS: I think so.

12 BY MR. TRESNOWSKI:

13 Q. And your marketing person has produced
14 marketing materials in connection with their
15 understanding of your brand?

16 MR. BRADY: Objection. Vague. Calls for
17 speculation.

18 THE WITNESS: I believe so.

19 BY MR. TRESNOWSKI:

20 Q. Do you teach a skill called "room
21 clearing" in your self-defense courses?

22 A. Do I have a class called "room
23 clearing"?

24 Q. Do you teach a skill called "room

1 clearing"?

2 A. Yes.

3 Q. What is "room clearing"?

4 A. It is how to move about a room where
5 there might be a known adversary.

6 Q. Is room clearing used in your law
7 enforcement career?

8 A. Have I used that skill in my law
9 enforcement career? Yes, I have.

10 Q. Did you use that skill in your military
11 career?

12 A. Yes.

13 Q. Why might a civilian use that skill?

14 MR. BRADY: Objection. Vague. Incomplete
15 hypothetical. Calls for speculation.

16 THE WITNESS: Because they might end up in a
17 room with an armed individual.

18 BY MR. TRESNOWSKI:

19 Q. Warrior's Creed offers courses in rifle,
20 pistol and self-defense, correct?

21 A. Yes.

22 Q. Does it require a specific rifle for the
23 courses about rifle use?

24 A. No.

1 Q. Does it require a specific pistol?

2 A. No.

3 Q. Does the courses on shotgun require a
4 specific shot gun?

5 A. No.

6 Q. Why not?

7 A. I'm not -- I don't sell for a brand or a
8 manufacturer. You show up with what you have, and
9 we train you with it.

10 So we have the ability to train
11 you across -- as I mentioned earlier, many skill
12 sets and experience crosses a wide variety of small
13 ones.

14 Q. We are going to pivot to a new topic
15 here. When were you first contacted about this
16 case?

17 MR. BRADY: Objection in that it calls for
18 privileged communications with counsel.

19 MR. TRESNOWSKI: You can go ahead and answer.
20 I'm just asking you when you were first contacted.

21 THE WITNESS: I'd have to look it up. I don't
22 recall right off the top of my head.

23 BY MR. TRESNOWSKI:

24 Q. Were you contacted in calendar year

1 2024?

2 A. I believe so, yes.

3 Q. Who contacted you?

4 A. The attorney for whom I work, Sean
5 Brady.

6 Q. How Sean Brady found you?

7 MR. BRADY: Objection. Calls for speculation.
8 And to the extent it calls for attorney/client or
9 -- well, privileged communication with the witness.

10 THE WITNESS: I really don't recall. He may
11 have mentioned that when he first contacted me, but
12 I really don't recall. I don't recall if he
13 researched me or what. I don't know.

14 BY MR. TRESNOWSKI:

15 Q. Do you have an understanding of what
16 your assignment is in this case?

17 A. Yes. I'm to offer opinions based on my
18 expertise on these banned products in this case.

19 Q. Anything else?

20 A. That is about it.

21 Q. Do you understand that you were first
22 disclosed as an expert witness in this case on
23 March 27, 2024?

24 A. I'm sorry. Would you repeat that?

1 Q. Sure. Do you understand that you were
2 first disclosed as an expert witness in this case
3 on March 27, 2024?

4 A. Yes.

5 MR. TRESNOWSKI: I'm going to introduce as
6 Exhibit 11 a document.

7 (Exhibit 11 was marked for
8 identification.)

9 BY MR. TRESNOWSKI:

10 Q. Randy, do you see on your screen a
11 document has a title Plaintiffs Combined Expert
12 Witness Disclosure?

13 A. Yes.

14 Q. I'm marking as Exhibit 11 a document
15 with that title. It is a seven-page document,
16 dated March 27, 2024.

17 Do you recognize this
18 document, Randy?

19 A. I'm sorry. I don't remember this
20 specific document. I just know that I was going to
21 be disclosed as an expert witness. I don't recall.
22 I really don't recall. Sorry.

23 Q. Do you see the name of the four
24 lawsuits?

1 A. I do, yes.

2 Q. At the top here?

3 A. I do.

4 Q. And do you see this document is signed
5 by the attorney with you on this deposition, Sean
6 Brady?

7 A. Yes.

8 Q. Do you see that paragraph 4 of this
9 disclosure has your name in it?

10 A. Yes.

11 Q. Is the paragraph 4 accurate?

12 A. Not quite. He has a total of 32 years
13 of service. That was when I first retired and then
14 I went back for 4 more years, so it is a total of
15 36 years with the Ogden Police Department.

16 Q. Any other inaccuracies?

17 MR. BRADY: Objection. Calls for speculation.
18 Vague. This was a document prepared by counsel.

19 THE WITNESS: It looks pretty good to me.

20 BY MR. TRESNOWSKI:

21 Q. Do you agree it is your intent in this
22 lawsuit to offer testimony as to the popularity and
23 ubiquity of firearms banned by PICA in self-defense
24 training courses and the utility of those firearms

1 for self-defense and other lawful purposes?

2 A. That statement sounds like what I just
3 said, what I'm here to offer my expert opinion on.

4 Q. So you agree it is accurate?

5 A. I agree with it.

6 Q. Other than the topics identified in
7 paragraph 4 of this document, are there any other
8 topics in which you intend to offer testimony?

9 MR. BRADY: Objection. Vague.

10 THE WITNESS: I intend to offer testimony
11 within the scope of what is written there.

12 BY MR. TRESNOWSKI:

13 Q. And do you intend to offer testimony on
14 anything outside of the scope of what is written
15 there?

16 MR. BRADY: Objection. Vague.

17 THE WITNESS: It is a broad statement.

18 I intend to answer the questions
19 presented to me in testimony and within that broad
20 statement that is contained within paragraph 4.

21 BY MR. TRESNOWSKI:

22 Q. I think I asked a yes-or-no question.
23 Are there any topics on which you intend to offer
24 testimony?

1 MR. BRADY: Objection. Argumentative.
2 Counsel is not to instruct the witness on how to
3 answer the question. Vague. Asked and answered.

4 THE WITNESS: I think my answer is good. I
5 intend to offer testimony within the scope of what
6 is in Paragraph 4.

7 BY MR. TRESNOWSKI:

8 Q. The disclosure here mentions
9 self-defense. What does the phrase "self-defense"
10 mean to you?

11 A. What does the term "self-defense" mean
12 to me?

13 Q. Yes.

14 A. It is defending oneself against violence
15 offered or exhibited by others.

16 Q. Is it your opinion firearms are useful
17 for self-defense?

18 A. I'm sorry. Would you repeat that?

19 Q. Is it your opinion firearms are useful
20 for self-defense?

21 A. Absolutely.

22 Q. Why?

23 A. When a person is employing particularly
24 deadly force against you, there are very few

1 alternatives to offer to defend yourself, if not a
2 firearm.

3 Q. Have you fired a firearm in self-defense
4 in your role as a civilian?

5 A. As a civilian, no.

6 Q. In your experience as a police officer,
7 did you encounter instances in which civilians
8 fired firearms in self-defense?

9 A. Yes.

10 Q. How frequently did you encounter such a
11 scenario?

12 A. Not very frequently.

13 Q. Over the course of your 36 years, how
14 many times did you encounter an incident in which a
15 civilian fired a firearm in self defense?

16 A. I would have no idea how to put that
17 number into place.

18 Q. Less than 100 times?

19 A. Are you talking about personally or my
20 experience in the department?

21 Q. In the course of your job duties as a
22 police officer, I'm interested in how many times
23 you've encountered scenarios in which civilians
24 fired in self-defense?

1 A. I encountered probably a couple dozen.
2 My department has knowledge of, and I, therefore,
3 have knowledge of many more than that.

4 Q. Do you recall the specific instance
5 giving rise to those uses of firearms in
6 self-defense?

7 MR. BRADY: Objection. Vague. Calls for
8 speculation.

9 THE WITNESS: I would just have to say it was
10 in defense of themselves or someone else.

11 BY MR. TRESNOWSKI:

12 Q. Do you have more specifics about those
13 instances?

14 A. Not really.

15 Q. For example, was one of the instances an
16 instance of home invasion?

17 A. Ones, personally? No. Department
18 knowledge of ones? Yes. I can think of a couple.

19 Q. Do you remember the circumstances of
20 those home invasions?

21 A. No, I do not. That is about the best I
22 can do right now.

23 Q. Were any of those instances car
24 jackings?

1 A. I know of my department dealing with car
2 jackings, yes.

3 Q. Did your department have instances in
4 which individuals fired? So an armed robbery?

5 A. I don't recall specifically armed
6 robberies.

7 I'm not saying it didn't happen.
8 I'm just saying I don't recall it specifically.

9 Q. Do you recall any instances -- strike
10 that.

11 As part of your job duties with
12 Warrior Creed, you teach self-defense courses,
13 correct?

14 A. I do, yes.

15 Q. What is the self-defense training
16 course?

17 MR. BRADY: Objection. Vague.

18 THE WITNESS: It is a course where persons
19 learn to defend themselves when there is a use of
20 violence.

21 BY MR. TRESNOWSKI:

22 Q. In your self-defense courses how many
23 instructors are there in this particular class?

24 A. Depends on the number of students.

1 Q. Can you elaborate how the relationship
2 between the instructors and number of students?

3 A. It depends on the subject and number of
4 students. If it is something I can easily teach
5 without paying for a contractor to come in and
6 help, then I do it myself.

7 If it is a larger class and I
8 need some assistance, then there will be another
9 one, approximately two more.

10 Q. And how many students are typically in a
11 course?

12 A. I'm sorry?

13 Q. How many students are typically in your
14 courses?

15 A. Just depends on the class. You can have
16 as few as 8 and as many as 30.

17 Q. And when someone takes a course from
18 you, is it typically a single class, or do they
19 have to take multiple classes to complete a
20 particular course?

21 A. It is normally offered in a specific
22 class, but there are a series of classes.

23 Q. And are the size of your self-defense
24 courses similar to other self-defense courses?

1 MR. BRADY: Objection. Vague.

2 THE WITNESS: You mean other companies?

3 BY MR. TRESNOWSKI:

4 Q. Correct. Other companies, yes.

5 MR. BRADY: Objection. Vague. Calls for
6 speculation.

7 THE WITNESS: That market is so huge. I would
8 not even begin to know how people limit their
9 numbers or the classes or what they accept as a
10 minimum number.

11 It is just -- the marketplace is
12 just too big. The number of trainers is just too
13 large. The number of students wanting all this
14 type of training as just described is just too
15 large.

16 BY MR. TRESNOWSKI:

17 Q. So you have no knowledge of the typical
18 number of students in self-defense courses offered
19 by other companies?

20 MR. BRADY: Objection. Misstates testimony.
21 Vague.

22 THE WITNESS: I don't think there is a typical
23 number.

24 BY MR. TRESNOWSKI:

1 Q. Why do you think there is not a typical
2 number?

3 A. Because you can have a class of three
4 people. You can have a class of 30 people. It
5 just depends.

6 It depends on what parameters an
7 instructor puts in place in his minimum numbers and
8 maximum numbers, and they are all different.

9 Q. You said the market for self-defense
10 courses is large?

11 A. Yes.

12 Q. How large?

13 A. I can't even begin to put a number on
14 it, but if you Google "self-defense firearm
15 training," as I'm sure you have, you will find out
16 it is large.

17 Q. So you do not know how many self-defense
18 courses there are in America?

19 A. I wouldn't even begin to know.

20 Q. Why is it useful for civilians to take a
21 self-defense training course?

22 A. To protect themselves from crime or
23 other eventualities that they feel a need to do.

24 Q. Is it your opinion that a self-defense

1 course is necessary for a civilian to use a firearm
2 in self-defense?

3 MR. BRADY: Objection. Vague. Calls for
4 speculation. Incomplete hypothetical.

5 THE WITNESS: I think it is up to the
6 individual and how they feel about their abilities
7 and whether they want to increase those abilities
8 or even gain basic knowledge.

9 BY MR. TRESNOWSKI:

10 Q. But in your expert opinion, do you
11 believe that self-defense training is necessary to
12 effectively use a firearm in self-defense?

13 MR. BRADY: Objection. Vague. Calls for
14 speculation.

15 THE WITNESS: It depends completely on the
16 individual.

17 BY MR. TRESNOWSKI:

18 Q. So you defer to an individual's judgment
19 as to whether or not they need training?

20 MR. BRADY: Vague. Incomplete hypothetical.

21 THE WITNESS: I offer training. If someone
22 wants it, they come and get it.

23 MR. TRESNOWSKI: If we are going to take a
24 break, this might be a useful time. It is 11:45 in

1 Chicago. I know it is earlier where both of you
2 are, so I'm happy to do a later lunch for me if you
3 want to do a ten-minute break now and keep going?
4 Does that make sense?

5 MR. BRADY: It is up to you all.

6 THE WITNESS: I'm good with whatever you like.

7 MR. TRESNOWSKI: Why don't we take a
8 ten-minute break, and we will see how much we get
9 in before we take a lunch break. So we will be
10 back here at 11:55 my time.

11 (Recess.)

12 BY MR. TRESNOWSKI:

13 Q. Let's go back on the record.

14 Randy, you understand you are
15 still under oath?

16 A. Yes.

17 MR. TRESNOWSKI: I'm going to introduce as
18 Exhibit 12 a document entitled Expert Report of
19 Steven R. Watt. It is a 19-page document.

20 (Exhibit 12 was marked for
21 identification.)

22 BY MR. TRESNOWSKI:

23 Q. Do you see this document on your screen,
24 Randy?

1 A. I do.

2 Q. And what is this document I've labeled
3 as Exhibit 12?

4 A. It is the expert report of
5 Steven R. Watt.

6 Q. And is this the expert report you
7 drafted in connection with the -- this litigation?

8 A. It is.

9 Q. Did you draft this report?

10 A. I drafted my portion of this report.

11 Q. And what do you mean by your portion of
12 this report?

13 A. The opinions and the rest was compiled
14 by my attorney. In other words, organized.

15 Q. So you drafted sections -- starting here
16 at the bottom of Page 8 where your opinions begin?

17 A. Yes. And also the above stuff, that is
18 my personal stuff, is what I sent to him.

19 Q. Did you prepare Exhibit 1?

20 A. I did.

21 Q. And this is your signature here on Page
22 16?

23 A. That is right.

24 Q. Is this report accurate?

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

2 Q. And is this report complete?

3 A. To the best of my knowledge.

4 MR. BRADY: Objection. Vague.

5 BY MR. TRESNOWSKI:

6 Q. Did anyone help you write this report?

7 MR. BRADY: Objection to the extent it calls
8 for communications with counsel.

9 THE WITNESS: No. I wrote what I wrote.

10 BY MR. TRESNOWSKI:

11 Q. And you -- did your attorneys also draft
12 portions of the report?

13 MR. BRADY: Objection in that it calls for
14 communications with counsel. Vague.

15 THE WITNESS: My attorney did not write any of
16 this.

17 BY MR. TRESNOWSKI:

18 Q. Do you agree with all the statements
19 contained within this report?

20 A. Yes, I do.

21 Q. Sitting here right now, are there any
22 opinions you intend to offer in this litigation
23 that you did not include in this report?

24 MR. BRADY: Objection. Vague.

1 THE WITNESS: I don't believe so at this time.

2 BY MR. TRESNOWSKI:

3 Q. What did you do to draft this report?

4 A. I'm sorry?

5 MR. BRADY: Objection. Vague. Calls for
6 narrative.

7 BY MR. TRESNOWSKI:

8 Q. What did you do to draft this report?

9 MR. BRADY: Objection. Vague. Calls for
10 narrative to the extent it calls for privileged
11 communication with counsel.

12 THE COURT REPORTER: I'm sorry. Counsel, when
13 you turn your head, I can't hear you. Can I read
14 back where I left off?

15 MR. BRADY: Sure.

16 (Record read as requested.)

17 MR. BRADY: I would instruct the witness not
18 to answer to the extent it calls for that.

19 BY MR. TRESNOWSKI:

20 Q. Randy, you can go ahead and answer.

21 A. I'm sorry. I forgot what the question
22 was.

23 MR. TRESNOWSKI: Can you read back the
24 question.

1 THE COURT REPORTER: Sure.

2 (Record read as requested.)

3 MR. BRADY: Same objection.

4 THE WITNESS: I reviewed privileged documents
5 and drafted my opinions.

6 BY MR. TRESNOWSKI:

7 Q. You said you reviewed privileged
8 documents?

9 A. Correct.

10 Q. What do you mean by that?

11 A. Documents sent to me by my attorney.

12 MR. BRADY: Objection to the extent it calls
13 for communication with counsel.

14 BY MR. TRESNOWSKI:

15 Q. Did you rely on those documents in
16 drafting this report?

17 MR. BRADY: Objection. Privileged
18 communications -- it calls for privileged
19 communications.

20 THE WITNESS: I was informed by those
21 documents, and then I issued and wrote my opinion.

22 BY MR. TRESNOWSKI:

23 Q. And why do you believe those documents
24 are privileged?

1 MR. BRADY: Objection. Calls for legal
2 conclusion. Vague to the extent it calls for
3 communication with counsel. Privileged
4 communication. I'd instruct the witness not to
5 answer.

6 THE WITNESS: Because they were sent to me by
7 my attorney.

8 BY MR. TRESNOWSKI:

9 Q. Okay. What documents formed your
10 opinion in this case?

11 MR. BRADY: Objection to the extent it calls
12 for communication with counsel. Vague.

13 THE WITNESS: I'm not sure what you mean.

14 BY MR. TRESNOWSKI:

15 Q. This report includes your opinions that
16 you are offering in this litigation, correct?

17 A. You faded out there. Sorry.

18 Q. Okay. Let me ask it again. The expert
19 report here before us includes the opinions you
20 intend to offer in this litigation, correct?

21 A. Correct.

22 Q. Are those opinions based on documents?

23 A. Those opinions are based on the
24 litigation.

1 Q. But are they based on the documents?

2 MR. BRADY: Objection. Vague.

3 THE WITNESS: In order to know about the
4 litigation, I'd have to review the documents.

5 BY MR. TRESNOWSKI:

6 Q. So the opinions offered here are based
7 on litigation documents?

8 MR. BRADY: Objection. It misstates
9 testimony. Vague.

10 THE WITNESS: Yes. I'm lost as to the intent
11 -- I mean, I'm here to offer an opinion involved in
12 litigation. I have to know what that litigation
13 is.

14 BY MR. TRESNOWSKI:

15 Q. Correct. Did you review documents for
16 this litigation?

17 A. I'm sorry. I'm not connecting the dots
18 here. I offered an opinion based on this case.

19 Q. I understand. Did you review documents
20 from this litigation?

21 MR. BRADY: Objection. Vague.

22 THE WITNESS: I reviewed what my attorney sent
23 me.

24 BY MR. TRESNOWSKI:

1 Q. And were those documents for this
2 litigation?

3 A. I'm sorry?

4 BY MR. TRESNOWSKI:

5 Q. Were those documents filed in this
6 litigation?

7 MR. BRADY: Objection. Calls for speculation
8 to the extent that it calls for privileged
9 communication with counsel. I'd instruct the
10 witness not to answer.

11 THE WITNESS: Yes. They pertained to this
12 litigation.

13 BY MR. TRESNOWSKI:

14 Q. Which documents from this litigation did
15 you review?

16 A. I don't recall sitting here. If you
17 would like to ask my attorney for these documents,
18 I'm sure you already have them, but...

19 Q. You don't know which documents from this
20 litigation you reviewed?

21 MR. BRADY: Objection. Asked and answered.

22 THE WITNESS: Not sitting here.

23 BY MR. TRESNOWSKI:

24 Q. Did you review documents not connected

1 with this litigation in the course of your drafting
2 your opinion?

3 MR. BRADY: Objection. Vague.

4 BY MR. TRESNOWSKI:

5 Q. I just want to make sure I got the
6 answer. Is that "no"?

7 A. No.

8 Q. So you reviewed documents in this
9 litigation. You don't recall which, and you
10 reviewed no additional documents in preparing your
11 report, correct?

12 A. Yes. That is what I believe, yes.

13 Q. Did you review any expert reports in the
14 course of drafting your report?

15 MR. BRADY: Objection. Vague.

16 THE WITNESS: No.

17 BY MR. TRESNOWSKI:

18 Q. So we talked about the document you
19 reviewed in preparing this report. Is there
20 anything else you did in the course of preparing
21 this report?

22 MR. BRADY: Objection. Vague to the extent it
23 calls for privileged communications with counsel.

24 I would instruct the witness not to answer.

1 THE WITNESS: Not that I recall.

2 BY MR. TRESNOWSKI:

3 Q. Couple phrases in here I just want to
4 ask you about. Beginning the first sentence here,
5 paragraph 6 of your opinion. It is Page 9. You
6 mention your defensive carbine training courses.

7 Do you see that?

8 A. Yes.

9 Q. What do you mean by defensive carbine?

10 A. That is a carbine being used in
11 defending oneself against violence from another.

12 Q. What makes a carbine a defensive
13 carbine?

14 A. When it is used in defense against the
15 violence of another.

16 Q. Are there particular categories of
17 firearms that are exclusively defense carbines?

18 A. No. "Defense" refers to its use and
19 what I teach people.

20 Q. So any particular carbine could be a
21 defensive or offensive depending on its use?

22 MR. BRADY: Objection.

23 THE WITNESS: Yes.

24 BY MR. TRESNOWSKI:

1 Q. Is that the same with the phrase
2 defensive pistol that you use in your report?

3 A. Yes.

4 Q. It is not a description of the nature of
5 the machine. It is a description of its use; is
6 that correct?

7 A. That is correct.

8 Q. And that is the same with defensive
9 shotgun?

10 A. That is correct.

11 Q. There is no particular feature that will
12 render a shotgun a defensive shotgun. Correct?

13 MR. BRADY: Objection. Vague. Misstates
14 testimony.

15 THE WITNESS: It is the manner of its use in
16 defending oneself against the violence of another.

17 BY MR. TRESNOWSKI:

18 Q. Turn to paragraph 11 of your report.
19 I'm going to let you read the paragraph 11. Let me
20 know when you are finished reading it because I
21 have some questions.

22 Let me know when you want me to
23 scroll down.

24 A. Go ahead and scroll down for me, please.

1 Okay.

2 Q. Okay. In paragraph 11, you offer an
3 opinion about the popularity of certain firearms.
4 Correct?

5 A. Correct.

6 Q. And you group those firearms into three
7 categories; A, B and C, correct?

8 A. Correct.

9 Q. So to just make sure we are efficient
10 with our words here. If I refer to the "rifles"
11 and carbine in Section 11A of your report, you will
12 understand that I'm talking about firearms that
13 fall within this category right here on Page 12.
14 Does that make sense?

15 A. If you can elaborate. I don't know what
16 you mean by "this category."

17 Q. Sure. You said in describing, reading
18 back this definition you have, if I say the "rifles
19 you are giving an opinion about in 11A," you know
20 I'm talking about rifles and carbines that fall
21 within this definition? Does that make sense?

22 MR. BRADY: Objection. Misstates testimony as
23 to the definition being used.

24 MR. TRESNOWSKI: I'm not characterizing

1 anyone's testimony. I'm asking if he agrees with
2 my terminology. So go ahead and answer.

3 MR. BRADY: To be clear, Counsel, you are
4 saying there is a definition provided in the
5 report. The report is testimony.

6 I was referring to the use of
7 the term "definition" with respect to the witness's
8 report. So objection on those grounds. Objection.
9 Vague.

10 THE WITNESS: So I'm not defining anything
11 here. I'm listing a series of features that are
12 often found on these types of firearms. And I'm
13 fine with that if that is what you are intending.

14 BY MR. TRESNOWSKI:

15 Q. And one of your opinions is that the
16 firearms that fall within this category A in
17 paragraph 11, one of the opinions is that the
18 firearms that fall within this category are
19 popular, correct?

20 A. They are popular. Yes.

21 Q. And you will understand if I refer to
22 the firearms that fall within 11B of your report,
23 I'm referring to the pistols that fall within this
24 group here?

1 A. That contain those features. Yes, they
2 do.

3 Q. Same thing if I refer to the shot guns
4 in 11C of your report, I'm referring to firearms
5 that fall within this group here.

6 A. Those features contained within, yes.

7 Q. Are the firearms that fall within
8 paragraph 11A, B and C the only firearms with which
9 you intend to testify in this litigation?

10 MR. BRADY: Objection. Vague.

11 THE WITNESS: I intend to testify to the
12 common features found with these popular firearms
13 are what I'm testifying about, yes.

14 BY MR. TRESNOWSKI:

15 Q. Let me ask it another way. You've
16 identified certain rifles, pistols and shot guns in
17 11A, B and C, correct?

18 A. I've identified rifle, pistols and shot
19 guns that have certain features that are popular.
20 I'm not defining specifically a rifle, shotgun
21 pistol or shotgun. And I'm not speaking about a
22 brand or manufacturer of a rifle, carbine, pistol
23 or shotgun.

24 I do intend to offer opinions in

1 this litigation about any firearms that are not
2 identified in paragraph 11. I intend to offer
3 testimony related to these features and the
4 popularity of these features contained on these
5 firearms as described.

6 Q. Do you intend to offer any opinions
7 about any other firearms that are not here?

8 A. No.

9 Q. Let's turn to the semi automatic rifles
10 and carbines that fall within category 11A. Can
11 you identify one firearm that might fall within
12 this category?

13 A. By brand or by manufacturer or --

14 Q. Either way.

15 A. Model? Type? Anything? Is that what
16 you are asking?

17 Q. Yes. I'm just asking you to identify a
18 firearm that falls within 11A.

19 MR. BRADY: Objection. Vague.

20 THE WITNESS: It means having these features.
21 There are a myriad of brands, models, makes. I
22 mean to select one out of that group, doesn't seem
23 to be -- I don't see. I'm not sure exactly what
24 you mean because there are some in each of those

1 categories.

2 BY MR. TRESNOWSKI:

3 Q. I'm asking if you can provide an example
4 of a firearm that falls within 11A.

5 MR. BRADY: Objection. Vague.

6 THE WITNESS: Any semi-automatic rifle or
7 carbine as described. There are many manufactures
8 of those.

9 BY MR. TRESNOWSKI:

10 Q. Can you identify by brand name a firearm
11 that falls within 11A?

12 A. I can identify some off the top of my
13 head, brand names if that is what you are looking
14 for, but it would definitely not be inclusive of
15 all.

16 Q. Understanding it is not inclusive, can
17 you identify a firearm that falls within Section
18 11A?

19 A. Colt manufactures some of these.
20 Remington manufactures some of these. Winchester
21 manufactures some of these. Mossberg manufactures
22 some of these. Ruger manufactures some of these
23 with those features.

24 And then there are all types of

1 brands that manufacture the accessories.

2 Multi-command manufacturers
3 from, you know, small shops to large shops. Like
4 Magpul that manufactures some of these accessories.

5 So it is huge. They are so
6 popular. It is just a huge number of manufactures.

7 Q. Do you have an opinion about the
8 popularity and ubiquity of the rifles identified in
9 Section 11A?

10 A. Well, this whole thing is my opinion.
11 And yes, they are very, very popular. Across, you
12 know, multiple areas of the firearms world. If you
13 want to narrow that down, I can attempt to answer.

14 Q. So it is your opinion that there are --
15 that these rifles identified in Section 11A are
16 popular across areas of the firearms world?

17 A. Yes.

18 Q. What do you mean by "popular"?

19 A. People like them. The average citizen
20 -- the average gun owner likes this type of rifle
21 and carbine.

22 Q. It is your opinion that they are popular
23 because people like them? The average citizen
24 likes them, and the average owner likes them?

1 MR. BRADY: Objection. Misstates testimony.

2 THE WITNESS: Yes.

3 BY MR. TRESNOWSKI:

4 Q. Do you have any other opinions about the
5 popularity of the rifles that you've identified in
6 Section 11A?

7 MR. BRADY: Objection. Vague.

8 THE WITNESS: I mean if you were to tie the
9 popularity, the number of sales that occur, I think
10 you would have to agree with me that they are very,
11 very popular.

12

13 BY MR. TRESNOWSKI:

14 Q. So part of your opinion is about the
15 sales of these firearms?

16 MR. BRADY: Objection. Vague.

17 THE WITNESS: They sell a lot of these
18 firearms, yes.

19 BY MR. TRESNOWSKI:

20 Q. You mentioned earlier that people like
21 the rifles you've identified in Section 11A?

22 A. Yes, I believe I did.

23 Q. Do you have an opinion about how many
24 people like those rifles?

1 MR. BRADY: Objection. Calls for speculation.

2 THE WITNESS: Yes. The best way I can
3 describe it is it is a large number.

4 Q. You cannot offer a specific number?

5 A. I can't remember.

6 Q. You said earlier the average citizen
7 likes these rifles?

8 A. Average citizens that are gun owners,
9 yes.

10 Q. And what do you mean by an average
11 citizen who is a gun owner?

12 A. The people who buy guns buy a lot of
13 these. They like them.

14 Q. So you have an understanding of the
15 average person who buys guns?

16 MR. BRADY: Objection. Misstates testimony.
17 Vague.

18 THE WITNESS: It crosses all demographics.

19 BY MR. TRESNOWSKI:

20 Q. Do you know how many people who like
21 guns, purchase the rifles you've identified in
22 Section 11A?

23 MR. BRADY: Objection. Calls for speculation.
24 Vague.

1 THE WITNESS: How many asks for a number. I
2 don't have a number.

3 BY MR. TRESNOWSKI:

4 Q. You said they sell a lot of them
5 referring to the rifles in 11A; is that correct?

6 A. Yes.

7 Q. Well, first of all, who is "they"?

8 A. The firearms industry. The
9 manufacturers.

10 Q. Do you know how many they sell?

11 MR. BRADY: Objection. Calls for speculation.

12 THE WITNESS: I do not.

13 BY MR. TRESNOWSKI:

14 Q. Is it your opinion that a large number
15 of people like the rifles identified in Section
16 11A? What is that opinion based on?

17 A. As you've established, you know, I have
18 a great deal of expertise in this realm. I'm
19 involved in training with firearms. I own a number
20 of firearms. I am in this firearms world. I read
21 the magazines. I follow the news stories. I have
22 a great deal of background expertise.

23 You've seen my CV. I've
24 attended a lot of training. It is my personal

1 knowledge being in this field that informs that
2 opinion.

3 Q. So you mentioned trainings. What do you
4 do at trainings to determine how many people like
5 their rifles described in 11A?

6 MR. BRADY: Objection. Vague.

7 THE WITNESS: That is based on how many show
8 up with them.

9 BY MR. TRESNOWSKI:

10 Q. Do you record how many individuals show
11 up with semi-automatic rifles that are identified
12 in Section 11A?

13 A. No.

14 Q. How do you collect data from those
15 trainings then?

16 MR. BRADY: Objection. Vague.

17 THE WITNESS: I have never had someone show up
18 for my rifle training that doesn't have one of
19 these types of style carbines with some or all of
20 these features.

21 BY MR. TRESNOWSKI:

22 Q. I will let you finish.

23 A. I teach in the self-defense world. I
24 don't teach precision rifle. I don't teach three

1 gun competition. I don't teach competitive
2 shooting where all these things -- all these guns
3 are popular based on my personal knowledge and
4 experience. But in the self-defense realm, these
5 are the favorite style of rifles and carbines that
6 people show up for training.

7 Q. And you know this is what people show up
8 for training based on your observations?

9 MR. BRADY: Objection. Misstates testimony.

10 THE WITNESS: Based on my direct observation
11 of the rifles and carbines they bring to class.
12 Yes.

13 BY MR. TRESNOWSKI:

14 Q. And those direct observations occur at
15 your self-defense training courses, correct?

16 A. That is correct.

17 Q. You mentioned that you are in this world
18 earlier. Do you remember saying that?

19 A. Yes. The firearms training world, yes.

20 Q. What do you mean by "in this world"?

21 A. Firearms training world.

22 Q. What does it mean that you are in that
23 world?

24 A. I thought I just answered that.

1 That is the firearms training
2 world. It is made up of the general public
3 trainers. It is made up of the people who seek,
4 desire training in the use of firearms.

5 Q. You mentioned reading magazines earlier.

6 A. Sure.

7 Q. Your opinion that a large number of
8 people like the rifles identified in Section 11A is
9 based on reading magazines; is that correct?

10 A. That is one of the components from which
11 I base my opinion, yes.

12 Q. What magazines?

13 A. All kinds of guns and ammo magazines;
14 conceal and carry -- various trade magazines. Oh,
15 boy. It's called Shotgun News, but it is not just
16 about shot guns. It is a large publication. Been
17 around for years.

18 Just a wide variety of different
19 magazines. There are ones that are titled towards
20 the national training world. There are a wide
21 variety of publications in this related area, and
22 that I'm familiar with, and that occasionally will
23 see and read.

24 There are websites that I go to.

1 There are chats that -- and we will talk amongst
2 ourselves in the firearm training world. There is
3 a great network of firearm trainers -- well, you
4 know, of like mind and opinions.

5 So, I mean, there are a lot of
6 things that form my opinion as we are sitting here
7 today.

8 Q. And do those magazines you read explain
9 a specific number of how many individuals like the
10 firearms in Section 11A?

11 MR. BRADY: Objection. Vague.

12 THE WITNESS: Well, a lot of magazines, a lot
13 of news stories, a lot of public chats and stuff
14 show numbers, but I can't recall off the top of my
15 head for -- where I am going to give a specific
16 number.

17 BY MR. TRESNOWSKI:

18 Q. In preparing your opinions about the
19 popularity of the rifles identified in Section 11A,
20 did you review any studies?

21 A. Did I what?

22 Q. Review any studies?

23 MR. BRADY: Objection. Vague.

24 THE WITNESS: Are you asking if I conducted my

1 own study?

2 BY MR. TRESNOWSKI:

3 Q. I'm asking if you reviewed any studies.

4 MR. BRADY: Objection. Vague.

5 THE WITNESS: No. That is -- my opinion is
6 based on my experience, training and expertise,
7 knowledge and variety of things. And that realm in
8 which I operate is constant -- no, I did not need
9 to review any studies for this report.

10 BY MR. TRESNOWSKI:

11 Q. Did you conduct any surveys regarding
12 the number of people who like the rifles identified
13 in Section 11A?

14 A. No.

15 Q. Why not?

16 A. Not -- conducting analysis and data --
17 the data is not part of what I do. I offer
18 training.

19 Q. You do not conduct analysis and data; is
20 that correct?

21 A. The kind you are asking for, correct. I
22 do not do it.

23 Q. Are there any other things you relied on
24 in developing your opinion about the popularity of

1 the firearms identified in Section 11A that we did
2 not talk about?

3 MR. BRADY: Objection. Vague.

4 THE WITNESS: As I stated, I'm informed by all
5 those things that provide me the expertise, which
6 brings me here with you.

7 BY MR. TRESNOWSKI:

8 Q. If you look back at your report on the
9 screen here, it says at the bottom here of the
10 first paragraph of 11 -- it says, "It is my opinion
11 that the following firearms are commonly possessed
12 by the American public for lawful defense and
13 training."

14 My question is what do you mean
15 by "commonly possess"?

16 A. Part of the purpose that people have
17 these firearms is for personal defense and the
18 training in personal defense that they need to be
19 effective.

20 Q. What does "commonly possessed" mean?

21 MR. BRADY: Objection. Asked and answered.

22 THE WITNESS: It means that primarily some of
23 the reasons they have them is lawful personal
24 defense and training.

1 BY MR. TRESNOWSKI:

2 Q. How do you know something is common
3 rather than uncommon?

4 A. I'm sorry?

5 Q. Let me rephrase the question.

6 How do you know if something is
7 common rather than uncommon?

8 MR. BRADY: Objection. Vague. Incomplete
9 hypothetical.

10 THE WITNESS: Again, based on my experience,
11 training, education.

12 BY MR. TRESNOWSKI:

13 Q. Are there some firearms that are
14 uncommon?

15 A. That are? I'm sorry.

16 Q. That are uncommon?

17 A. I'm sorry. I lost you.

18 Q. Are there some firearms that are
19 uncommon?

20 A. Sure. There are. You know, there are
21 collectibles, and there are historic and antiques.
22 There are a variety of classes.

23 Q. And how do you know if a firearm falls
24 into the common or uncommon category?

1 A. The ones I see a lot of are common. The
2 ones I don't see, read, hear about are -- or that I
3 know personally of are uncommon or antique or
4 historical purposes, yes.

5 Q. So is it accurate that by common, you
6 see a lot of them?

7 A. Yes.

8 Q. And that is how you determine whether
9 the firearms are common or uncommon, whether or not
10 you see a lot of them?

11 MR. BRADY: Objection. Misstates testimony
12 and vague.

13 BY MR. TRESNOWSKI:

14 Q. When are you seeing firearms other than
15 your self-defense courses?

16 A. I've seen them in the magazines. I'm
17 seeing them in articles. I've seen them from
18 trainers, I've discussed it with them. I'm seeing
19 them on the walls of gun shops. I'm seeing them in
20 sales.

21 I mean we could go on and on.

22 Q. Looking at paragraph 11, you
23 mentioned -- you use the phrase "the vast market
24 that exists for such firearms and their related

1 products." Do you see that?

2 A. I do.

3 Q. What do you mean by the phrase "the vast
4 market"?

5 A. That the market is quite large.

6 Q. How do you go about figuring out whether
7 a market for a particular product is large or not
8 large?

9 A. By those same considerations I just
10 provided. How often I see them, hear about them,
11 talk about them.

12 Q. So if it is something you see a lot, you
13 hear a lot, and you talk about it a lot, that means
14 there is a large market?

15 MR. BRADY: Objection.

16 BY MR. TRESNOWSKI:

17 Q. Go ahead and answer, Randy.

18 A. Yes. In my opinion, yes.

19 Q. You do not cite any market research
20 analysis in your report, correct?

21 MR. BRADY: Objection. Vague.

22 THE WITNESS: I do not.

23 BY MR. TRESNOWSKI:

24 Q. Why not?

1 A. I didn't feel I needed to for this
2 report.

3 Q. Do you think your opinions about the
4 numbers of people who like the firearms in Section
5 11A would be more accurate than in your consistent
6 analysis in the market?

7 MR. BRADY: Objection. Argumentative. Calls
8 for speculation. Incomplete hypothetical. Vague.

9 THE WITNESS: I think if I were to include
10 numbers, it would back up and verify my opinion as
11 I stated it here.

12 BY MR. TRESNOWSKI:

13 Q. The data you collected is from your
14 personal observations, correct?

15 MR. BRADY: Objection. Vague. Misstates
16 testimony.

17 THE WITNESS: The data -- I'm sorry. I didn't
18 list data, but the information I put here in my
19 opinion is based on all of those factors previously
20 discussed that put me in this firearms and
21 self-defense training realm that have made me an
22 expert.

23 BY MR. TRESNOWSKI:

24 Q. Most of your observations take place in

1 your own firearm courses, correct?

2 MR. BRADY: Objection. Misstates testimony.
3 Incomplete hypothetical.

4 THE WITNESS: I wouldn't say that. I would
5 say that all those things I've talked about -- I
6 mean this is part of my daily life. This is what I
7 do.

8 So all of those things we've
9 talked about, from interactions, from the
10 instructors, companies, magazines, materials, the
11 internet, all kinds of different things informed my
12 opinions as to where we are today.

13 Q. How do you know that your opinion
14 regarding popularity of rifles in Section 11A is
15 accurate?

16 A. Well, I like to believe that my
17 opinions, based on all those factors I have listed
18 are accurate. They are my opinions.

19 Q. How do you know they are accurate?

20 MR. BRADY: Objection. Vague.

21 THE WITNESS: Based on education, training,
22 experience, involvement in this marketplace, the
23 lawful personal self-defense, firearms training
24 world, I believe my opinions are accurate.

1 BY MR. TRESNOWSKI:

2 Q. Are you aware of anyone that disagrees
3 with you?

4 A. I'm not aware of anyone who disagrees
5 with me.

6 Q. Are you aware of any other methodologies
7 determining rifle popularity other than your own?

8 MR. BRADY: Objection. Vague. Calls for
9 speculation.

10 THE WITNESS: I'm sure there are people in
11 organizations that you or I could reach out to that
12 could put numbers against these things, and then
13 you would combine them with my opinion and
14 determine whether or not it was correct, but I
15 don't see a need to do that here.

16 BY MR. TRESNOWSKI:

17 Q. And why not?

18 A. Because I think my opinion is pretty
19 good.

20 Q. Does your report cite all the magazines
21 you relied upon in form your opinion about the
22 popularity of rifles in 11A?

23 A. I did not cite specific magazines. I
24 referred to some magazines as I recall.

1 Q. Does your report cite all the news
2 stories that form your opinion about the popularity
3 of the rifles in Section 11A?

4 A. No. And I would have no idea of how to
5 collect 40 years of news stories or magazines or
6 all the other books or all the other internet
7 materials that have formed my opinions.

8 Q. So your opinion is formed in part by
9 internet materials that you cited in your report,
10 correct?

11 MR. BRADY: Objection to the testimony.
12 Vague.

13 THE WITNESS: My opinion is based on all those
14 things I've enumerated here including 40-plus years
15 in this arena.

16 BY MR. TRESNOWSKI:

17 Q. Let's turn to Section 11B.

18 Do you have an opinion about the
19 popularity of the semi automatic pistols you've
20 identified in 11B?

21 A. Yes, they are popular.

22 Q. What do you mean?

23 A. The exact same thing I said in 11A.

24 Q. So in 11A you said they are popular

1 because people like them?

2 MR. BRADY: Objection. Misstates testimony.

3 THE WITNESS: People like them. People buy
4 them. People bring them to training. People
5 discuss them. Instructors discuss them. Internet
6 boards discuss them. Magazines talk about them.

7 A whole wide variety of actors
8 that talk about it.

9 BY MR. TRESNOWSKI:

10 Q. So if people discuss a particular
11 firearm, that means the firearm is popular?

12 MR. BRADY: Objection. Misstates testimony.
13 Argumentative. Vague.

14 THE WITNESS: When they speak of specific
15 firearm, they discuss a specific firearm, and that
16 firearm falls within this category, because
17 remember there are no brands -- no specific brands,
18 manufacturers or other -- specific pistol. Yes, it
19 helps point out the popularity of semi automatic
20 pistols contained in 11B.

21 BY MR. TRESNOWSKI:

22 Q. Do you have expertise in the nature of
23 the market for pistols?

24 MR. BRADY: Objection. Vague.

1 THE WITNESS: When you say "expertise," are
2 you --

3 BY MR. TRESNOWSKI:

4 Q. My question is do you have expertise in
5 the nature of the market for pistols?

6 MR. BRADY: Objection. Vague.

7 THE WITNESS: So the expertise that I've
8 already enumerated and enumerated whatever term you
9 like to use throughout this report, includes rifles
10 carbine, semi-automatic pistols, semi-automatic
11 shot guns and other like firearms contained within
12 this report, and other than that, I don't know how
13 to address your question, exactly.

14 BY MR. TRESNOWSKI:

15 Q. Do you have an opinion about the
16 percentage of pistols available on the firearms
17 market that fall within 11B?

18 MR. BRADY: Objection. Vague.

19 THE WITNESS: My opinion -- it is my opinion
20 the majority do.

21 BY MR. TRESNOWSKI:

22 Q. And what is that opinion based on?

23 A. The same factors as we talked about
24 before. I see them. I hear about them. I read

1 about them. I reviewed them, those factors.

2 Q. Let's look up at Paragraph 7 of your
3 report. The question about a sentence here, you
4 say, "Relatedly, the accessory such as the barrel
5 threaded at the muzzle for the attachment of sound
6 suppressors and barrel compensators to reduce
7 recoil to provide for greater accuracy in necessary
8 following shots are very common in courses and in
9 effective self-defense firearms training."

10 Do you see that sentence?

11 A. I do.

12 Q. Do you think that sentence is accurate?

13 A. I do.

14 Q. What did you mean by "very common"?

15 A. I mean there are a lot of them.

16 Q. What is the difference between common
17 and very common?

18 A. The very emphasizes the common.

19 Q. Does it mean there are more that -- you
20 referred to some firearms as common, and some
21 firearms as very common. Are the firearms that you
22 refer to as "very common" more popular?

23 A. We are talking about accessories. These
24 accessories are very common and in self-defense

1 training and use.

2 Q. Is this opinion limited to your courses?

3 A. Limited to what?

4 Q. To the courses you teach?

5 MR. BRADY: Objection. Vague.

6 THE WITNESS: Again, we are talking about all
7 those areas in which I operate or am informed as we
8 listed before.

9 BY MR. TRESNOWSKI:

10 Q. Which are observations of your courses,
11 materials you've read in the media and
12 conversations with others?

13 MR. BRADY: Objection. Misstates testimony.
14 Vague.

15 THE WITNESS: Yes. Those are some of those.

16 BY MR. TRESNOWSKI:

17 Q. Are there other ones I didn't list?

18 A. Well, you didn't specifically say
19 magazines. Okay. I mean, training, experience,
20 visual observations. Observations at gun stores.
21 Observations of friends and other instructors.
22 Reading about them in magazines. Internet
23 material. Seeing them on videos. Marketing
24 videos. Sales videos. Manufacturer's videos. We

1 could go on and on.

2 Q. Well, if there are additional sources,
3 other than the ones you just listed, could you go
4 on?

5 A. Can we just stick with these are my
6 opinion that these are very common in courses and
7 an effective self-defense firearms training and
8 use?

9 Q. I know that is your opinion. I'm just
10 trying to make sure I understand what that opinion
11 is based on.

12 MR. BRADY: Objection. Asked and answered.

13 THE WITNESS: Yes. I don't know how much more
14 I can give you about those things that inform my
15 opinions. Than what we have talked about
16 throughout this deposition.

17 I'm not trying to be
18 argumentative. I just don't know how to expand on
19 it again and again.

20 BY MR. TRESNOWSKI:

21 Q. Are all your students -- do you teach a
22 pistol course?

23 A. Yes, I teach pistol courses.

24 Q. Do all your students use pistols that

1 fall into this category, Section 11B?

2 MR. BRADY: Objection. Vague. Incomplete
3 hypothetical.

4 THE WITNESS: Yes. All my pistol students
5 utilize pistols that fall within the category we
6 talked about here.

7 BY MR. TRESNOWSKI:

8 Q. Every single student in your pistol
9 course uses a pistol that falls within 11B?

10 MR. BRADY: Objection. Misstates testimony.
11 Vague.

12 THE WITNESS: Yes. In my pistol courses,
13 these are the pistols that people bring to
14 training.

15 BY MR. TRESNOWSKI:

16 Q. You do not have students who show up
17 with a semi-automatic pistol that lacks any of
18 those features you've identified?

19 MR. BRADY: Objection. Vague.

20 THE WITNESS: That is not what I said. I said
21 they show up with pistols that fall within this
22 category. I'm not saying they have every feature.
23 They fall within this category. They are
24 semi-automatic pistols that have one or more of

1 these features.

2 BY MR. TRESNOWSKI:

3 Q. My question is, is it your testimony
4 that you do not have students that show up with
5 semi-automatic pistols to your pistol course that
6 does not have any of the features listed here?

7 MR. BRADY: Objection. Vague.

8 THE WITNESS: Yes, that is my testimony.

9 BY MR. TRESNOWSKI:

10 Q. Do you have an opinion about the
11 semi-automatic shot guns here in 11C? Do you have
12 an opinion about their popularity?

13 A. Yes. That they are very popular.

14 MR. BRADY: Objection. Vague.

15 BY MR. TRESNOWSKI:

16 Q. If we go up to Paragraph 8, you state,
17 "Detachable box magazines used for with
18 semi-automatic shot guns that are common and
19 ever-growing presence in the courses, particularly
20 as more manufactures create better design
21 attachable box magazine, models of semi-automatic
22 defense shot guns."

23 Do you see that?

24 A. I do.

1 Q. What is a "detachable box magazine"?

2 A. The box magazine is a term referring to
3 a magazine that is detachable from the firearm.

4 Q. And is it the case that manufactures
5 have created better design versions of that
6 firearm?

7 A. That is one of the factors, yes.

8 Q. Was there an issue with that before the
9 manufacturers created better designs?

10 A. I'm not understanding your question.

11 Q. You said the manufactures are creating
12 better designs for --

13 A. There is an ongoing market. Growing
14 market for shot guns with detachable box magazines.

15 Q. How do you go about figuring out whether
16 a market is growing or shrinking?

17 A. They start to sell more of them and put
18 more out.

19 Q. And you figure out what manufacturers
20 are selling and putting out, based on your
21 observations?

22 A. Based on my observations, based on my
23 reading, based on my discussions, based on all
24 those factors that we've talked about previously.

1 Q. Do you have an opinion about what
2 percentage of your clients use shot guns that have
3 detachable box magazines?

4 A. I really don't.

5 Q. The bottom here you say "Virtually, all
6 defensive shot guns have a detachable box magazine
7 or a tubular magazine that has capacity over five
8 rounds." Is that sentence correct?

9 A. That is correct.

10 Q. If we were to take out the word
11 "defensive" there, is the sentence still accurate
12 in your opinion?

13 MR. BRADY: Objection. Vague. Incomplete
14 hypothetical.

15 THE WITNESS: We couldn't take out "defensive"
16 because that takes it outside the realm of what we
17 are talking about here.

18 If we took out "defensive," we
19 would be entering into a whole other category of
20 shot guns that are not common for use as defensive
21 shot guns.

22 BY MR. TRESNOWSKI:

23 Q. That is where my confusion is. You
24 explained earlier that defensive shot guns is just

1 how a shot gun is used?

2 A. Correct.

3 Q. So it is not referring to a category of
4 shotgun?

5 A. Right.

6 MR. BRADY: Objection. Vague. And misstates
7 testimony.

8 THE WITNESS: People don't -- people buy
9 certain guns for hunting. People buy certain guns
10 for defensive purposes and use, right? Shotguns --
11 if I'm going to shoot trap as my primary purpose
12 for this gun, it is not going to be a gun with a
13 tubular or magazine or a box magazine.

14 It is going to be an over/under
15 or single shot. Shotgun built specifically for
16 trap shooting. These are -- we have to have the
17 defensive shotgun in play to define these factors
18 and categories that we are talking about here upon
19 which I issued my opinion.

20 Q. So when an individual goes to purchase a
21 shotgun, they have a particular use they have for
22 that shotgun, correct?

23 MR. BRADY: Objection. Calls for speculation.
24 Vague, incomplete hypothetical.

1 THE WITNESS: Yes.

2 BY MR. TRESNOWSKI:

3 Q. And if their purpose is for self-defense
4 purposes, that becomes a defensive shotgun?

5 MR. BRADY: Objection. Vague. Misstates the
6 testimony.

7 THE WITNESS: My opinion, yes.

8 BY MR. TRESNOWSKI:

9 Q. And your testimony here is when one goes
10 to purchase a shotgun and their intent is to use it
11 defensively, virtually all those instances have
12 this particular characteristic you identify in this
13 sentence, correct?

14 MR. BRADY: Objection. Vague. Misstates
15 testimony.

16 THE WITNESS: Those two particular
17 characteristics, detachable box magazine or a
18 tubular magazine with a capacity over five rounds.

19 BY MR. TRESNOWSKI:

20 Q. My question is how do you know what
21 firearm consumers intent is at the point of
22 purchase?

23 A. Objection. Misstates testimony. Vague.

24 THE WITNESS: Again, they show up. Any

1 classes with them. Instructors talk about them,
2 the internet talks about them, magazines talk about
3 them, and they are designed for that purpose of
4 being a defensive shotgun and to sell to that
5 market -- people that want defensive shotguns.

6 BY MR. TRESNOWSKI:

7 Q. So you are able to separate the shotgun
8 market defensive and non-defensive based on the
9 basis you've identified?

10 MR. BRADY: Objection. Are we asking about
11 the Paragraph 8?

12 MR. TRESNOWSKI: Correct.

13 MR. BRADY: Which is referring to his training
14 courses, or are we asking about the market
15 generally?

16 BY MR. TRESNOWSKI:

17 Q. As far as that last question, I'm only
18 reading the last paragraph, paragraph 8, to refer
19 to the market for shotguns generally. Is that what
20 your opinion is about?

21 A. Yes. My opinion is about defensive
22 shotguns.

23 Q. And you are not just referring to
24 defensive shotguns in your courses, correct?

1 MR. BRADY: Objection. Misstates his
2 testimony.

3 THE WITNESS: I'm referring to a category of
4 shotguns that are designed and intended to be used
5 for defensive use and training.

6 BY MR. TRESNOWSKI:

7 Q. And your claim is that basically all
8 defensive shotguns across the country have these
9 two characteristics?

10 MR. BRADY: Objection. Misstates the
11 testimony. Vague.

12 THE WITNESS: That is my opinion.

13 BY MR. TRESNOWSKI:

14 Q. But if you were to learn that some of
15 those shotguns that were purchased for a different
16 purpose, it would change your testimony, correct?

17 MR. BRADY: Objection. Incomplete
18 hypothetical, vague. Calls for speculation.

19 THE WITNESS: We would have -- you would have
20 to have more information than just that simple
21 question to make me change my opinion.

22 BY MR. TRESNOWSKI:

23 Q. What information would you need?

24 A. What kind of shotgun did they buy. Did

1 they buy an over/under shotgun? A single shot
2 skeet gun? What did they buy? Did they buy for
3 sporting case use? We could go on and on with
4 this.

5 This is my area of expertise as
6 you've established. When I talk about defensive
7 shotguns, I'm talking about a specific thing.

8 BY MR. TRESNOWSKI:

9 Q. Is your testimony that you can
10 understand the purpose for which a shotgun was
11 purchased?

12 MR. BRADY: Objection. Misstates testimony.
13 Vague.

14 MR. TRESNOWSKI: I'm asking if it is his
15 testimony. I'm not mischaracterizing anything. So
16 you can go ahead and answer.

17 THE WITNESS: My expertise allows me to look
18 at a specific shotgun and tell you essentially what
19 it is for. And then you buttress that for people
20 showing you in training buttress that with people
21 showing up to use it in certain ways. Yes.

22 MR. TRESNOWSKI: We are approaching one
23 o'clock here. I'm happy with taking a -- does a
24 half hour work for everyone?

1 THE WITNESS: I'm fine with whatever you do.
2 It is totally up to you.

3 MR. TRESNOWSKI: There are a lot of folks on
4 the call, so why don't we plan on coming back here
5 at 1:30 my time? Okay. All right.

6 (Lunch recess)

7 MR. TRESNOWSKI: We are back on the record.

8 BY MR. TRESNOWSKI:

9 Q. Randy, do you understand you are still
10 under oath?

11 A. I do.

12 Q. How many instructors does Warrior Creed
13 have?

14 A. As I said earlier. We don't have any
15 employees. We have 1099 contractors. And
16 currently there are six or seven people who work
17 for us, but that is if SRW is contracted to do
18 something then I have a large group I can reach out
19 to.

20 Q. Of those six or seven, do they all live
21 in Utah?

22 A. Yes.

23 Q. Do they all have a military background?

24 A. No.

1 Q. Do some have a military background?

2 A. Yes.

3 Q. How many?

4 A. Let's see, two of them.

5 Q. Do they have police background?

6 A. Yes. Three of them.

7 Q. Are any of those ones with police
8 background also ones with military background?

9 A. Yes, one of them.

10 Q. Do any of them start as clients of
11 Warrior Creed?

12 A. So, there are two more. No military and
13 no law enforcement background, and they are clients
14 -- started out years ago as clients. But they
15 didn't solely work for Warrior Creed. They've been
16 through a lot of training at a lot of places and
17 then they went through our instructor program.

18 Q. And you mentioned there is another pool
19 you can turn to if you need additional instructors?

20 A. Yes. There is a very large network of
21 people. SRW will sub to somebody who has specific
22 needs. I can reach out to other businesses who
23 being sub too.

24 The market is huge as I've said

1 before so we help each other out.

2 Q. And what is -- how do you access that
3 network?

4 A. I mean we developed relationships over
5 the years.

6 Q. Your expert report offers opinions on
7 certain firearm features; is that correct?

8 A. My opinion includes features, yes.

9 Q. You, for example -- one of your opinions
10 is that a pistol group is useful?

11 A. Pistol group on a carbine -- rifle
12 carbine or shotgun, yes.

13 Q. And it is one of your opinions that a
14 forward grip on a carbine pistol is useful?

15 A. Yes.

16 Q. And is one of your opinions that an
17 adjustable stock on a long gun is useful?

18 A. Yes. On those same carbine and shot
19 guns we are talking about. Yes.

20 Q. And is one of your opinions that a flash
21 suppressor on a rifle or pistol is useful?

22 A. Yes.

23 Q. And it is one of your opinions that a
24 barrel shroud or rail system is useful?

1 A. Yes.

2 Q. Do you think that having those firearm
3 design features makes it easier to use a firearm?

4 MR. BRADY: Objection. Vague, incomplete
5 hypothetical.

6 THE WITNESS: It is not my opinion that it
7 makes it easier to use a firearm. It is my opinion
8 that it allows for capabilities for the use of
9 firearms.

10 BY MR. TRESNOWSKI:

11 Q. What do you mean by capabilities?

12 A. If I need a flashlight on the firearm,
13 it allows me to hang it on there.

14 If I need to have my hand in a
15 certain position so I can access certain controls
16 on the firearm, it is harder to do with a
17 traditional stock grip. Then a pistol grip
18 enhances that.

19 Q. So an individual's performance with the
20 firearm will be improved if they have certain
21 features?

22 A. Within certain parameters, yes.

23 Q. What is the goal of the use of a firearm
24 in the self-defense scenario?

1 A. To defend yourself against another's use
2 of force intended to cause serious bodily injury or
3 death.

4 Q. And is one of the goals to wound an
5 attacker?

6 MR. BRADY: Objection. Vague. Calls for
7 speculation. Incomplete hypothetical.

8 THE WITNESS: In our training we
9 don't get into wounding or killing. We get into
10 stop the conditions that meet the legal, ethical
11 and moral obligations contained within use of
12 force.

13 BY MR. TRESNOWSKI:

14 Q. What is the distinction?

15 A. Shoot to stop when the threat is over,
16 whatever the result is is the result. Right?

17 Q. When one fires a firearm in a
18 self-defense scenario, is it the intent to wound
19 the attacker?

20 MR. BRADY: Objection. Vague. Incomplete
21 hypothetical. Calls for speculation. Asked and
22 answered.

23 THE WITNESS: So the goal of a self-defense
24 use is to stop the other person from committing

1 violence.

2 If the firearm is actually fired
3 and in many cases, possession of a firearm stops
4 the attack, but in cases where the firearm is used,
5 we are not teaching a specific outcome of the use
6 of firearm. We are teaching them to utilize the
7 firearm up to and until the threat to them or
8 another party is over.

9 BY MR. TRESNOWSKI:

10 Q. And is it your testimony that the
11 presence of firearm design features makes it easier
12 to accomplish the goals of the self-defense
13 scenario?

14 A. Yes.

15 Q. So features have a relationship to the
16 effectiveness of a firearm?

17 A. Certainly.

18 Q. Do features have a relationship to the
19 possibility that someone is wounded with a firearm?

20 MR. BRADY: Objection. Vague. Incomplete
21 hypothetical.

22 THE WITNESS: In the use of a firearm defense,
23 one of the possible outcomes is somebody is
24 wounded.

1 BY MR. TRESNOWSKI:

2 Q. Is that outcome more likely if there are
3 certain design features on the firearm?

4 MR. BRADY: Objection. Incomplete
5 hypothetical.

6 THE WITNESS: I don't have a -- I can't state
7 that someone is less or more likely to be wounded.

8 MR. TRESNOWSKI: I'm going to reintroduce
9 Exhibit 12. It is the expert report.

10 Is the expert report up on everyone's
11 screen?

12 BY MR. TRESNOWSKI:

13 Q. Look at the top of page 11. You wrote
14 the sentence, "It is a common axiom amongst
15 experienced trainers, particularly those like mine,
16 who have engaged in self-defense shootings, that
17 there is no such thing as too much ammo." Is that
18 accurate?

19 A. That is correct.

20 Q. What is the basis for your opinion, that
21 there is no such thing as too much ammo?

22 A. So the basis of that opinion is formed
23 by my personal combat as a law enforcement officer
24 and as a soldier, my discussions with numerous

1 people who have been involved in self-defense
2 shootings by review of training materials and a
3 wide variety of things. And as you can see, it is
4 in quotation marks, meaning that it is a commonly
5 stated axiom that people use.

6 And what it is intended to
7 convey is that you are never going to know exactly
8 how much ammunition you should have on hand at the
9 time, so it is good to have a good amount of ammo,
10 including spare magazines or spare ammo, depending
11 on the nature of the firearm that you can utilize
12 if you run out.

13 Q. It is also your opinion that there is a
14 point at which the amount of ammo will diminish the
15 self-defense benefits, correct?

16 A. So, the concept is have sufficient ammo.
17 Don't carry minimums. Carry sufficient amounts,
18 but at some point, you know, it can boarder on
19 ridiculous.

20 Q. And what point is that?

21 A. Who knows --

22 MR. BRADY: Objection. Vague. Incomplete
23 hypothetical. It calls for speculation.

24 THE WITNESS: It depends. It depends on the

1 nature of the situation. It depends on what you're
2 doing. It is different for every situation. It is
3 different for every -- you know, whether you're in
4 military, law enforcement, civilian defending
5 yourself, whether in the course of your employment,
6 what your issue is. It is different.

7 That is designed to be -- look,
8 you need to carry sufficient ammo. It is up to you
9 to decide what sufficient is.

10 BY MR. TRESNOWSKI:

11 Q. So you conducted analysis to determine
12 the precise point at which more ammo has
13 diminishing benefits?

14 MR. BRADY: Objection. Vague. Misstates
15 testimony.

16 THE WITNESS: I didn't conduct analysis, but
17 having run out of ammo is not a pleasant place to
18 be.

19 BY MR. TRESNOWSKI:

20 Q. Did you run out of ammo in gun fights in
21 your military service?

22 A. Yes.

23 Q. Have you done so in your service as a
24 police officer?

1 A. Yes.

2 Q. Have you done so in the civilian
3 context?

4 A. No.

5 Q. Have you conducted any analysis to
6 determine how many rounds are typically fired in a
7 self-defense scenario?

8 MR. BRADY: Objection. Vague.

9 THE WITNESS: I haven't done any of that, but
10 there are other people in the industry whose
11 materials I may read in a variety of forms we've
12 talked about. But we've talked about that and
13 discussed that, and every self-defense scenario and
14 every law enforcement engagement, every military
15 engagement is unique.

16 There are just too many factors
17 to say what an average is. There are time factors
18 to say what you should have or shouldn't have.
19 What is going to be enough, and so, hence, the
20 statement.

21 BY MR. TRESNOWSKI:

22 Q. Do you know what extrapolation is?

23 A. I do.

24 Q. What is it?

1 A. It is where you take a set of facts and
2 you carry them over to a circumstance or situation
3 where they may fit.

4 Q. Is your opinion based on extrapolation?

5 MR. BRADY: Objection. Vague.

6 THE WITNESS: Extrapolation is common and
7 constant in every day use. I can't point to
8 specific extrapolations in my report or anything
9 there. So I'm not going to say I used
10 extrapolation in paragraph this or that.

11 I can't even tell you that I
12 exactly extrapolated something. But my opinion has
13 been formed by a wide variety of facts,
14 circumstances, education and so on, and so if my
15 opinion involves extrapolation, so be it. But I
16 can't tell you there is specific extrapolation
17 anywhere there.

18 BY MR. TRESNOWSKI:

19 Q. So you didn't consciously apply an
20 extrapolation methodology in forming your opinions?

21 A. No, I did not.

22 MR. BRADY: Objection.

23 BY MR. TRESNOWSKI:

24 Q. How many civilians have you -- scratch

1 that.

2 How many clients have you had in
3 your self-defense courses since 2008?

4 A. Across all of the stuff, it is several
5 thousand. I can't remember the number put down,
6 but I think it is around 8,000.

7 Q. And your opinions are based, in part, on
8 your observations of those 8,000 individuals?

9 A. In part, yes.

10 Q. And your -- but your opinion is not
11 limited to those 8,000 individuals. You're
12 providing opinions about the popularity of firearms
13 across America, correct?

14 MR. BRADY: Objection. Misstates the
15 testimony. Argumentative, vague.

16 THE WITNESS: My opinion is based on training,
17 education, experience, reading, studying,
18 talking, developing, learning across 40 years in
19 this realm -- 40-plus years in this realm.

20 So I'm not sure what specific
21 point you are trying to get at, but that is what
22 informs my opinion.

23 BY MR. TRESNOWSKI:

24 Q. Do you know what a representative sample

1 is?

2 A. I do.

3 Q. What is it?

4 A. Representative sample or as is in this
5 study is the sample in which you apply a study --
6 the research to get the information you need.

7 Q. What steps did you take to ensure that
8 the information you collected constituted a
9 representative sample?

10 MR. BRADY: Objection. Misstates testimony.
11 Vague.

12 THE WITNESS: I didn't take any steps. My
13 representative samples are those people that are in
14 the same realm that I am in, and across those that
15 purchase firearms for self-defense around the
16 country.

17 BY MR. TRESNOWSKI:

18 Q. Other than the attorneys who represent
19 the plaintiffs in this case, have you discussed
20 this litigation with anybody?

21 A. I have not.

22 Q. Have you been retained to do any further
23 work in this litigation after today?

24 A. I'm sorry. What?

1 Q. Have you been retained to do any further
2 work in this litigation after today?

3 A. Yes. I've been retained as an expert in
4 this case in wherever it takes us.

5 Q. Earlier we watched a YouTube video. Do
6 you remember that?

7 A. I do.

8 Q. And that was marked as Exhibit 1. Do
9 you have possession of that video?

10 A. I don't -- I'd have to go looking for
11 it. I'm sure I have it somewhere, yes.

12 I don't know exactly. Either I
13 have it or the lady that does my marketing has it.

14 Q. So as you sit here right now, you
15 believe either you have it or somebody who does
16 your marketing has it?

17 A. I believe I do, but the first young man
18 that did all my marketing, unfortunately passed
19 away from cancer at a very young age, and we lost
20 quite a few materials from him. So I don't know
21 what still exists from the old stuff that we had.

22 Q. I just want to clarify some term earlier
23 about the concept of a defensive shotgun, defensive
24 carbine, defensive pistol.

1 Someone who is not a firearms
2 expert, is there a way for them to understand
3 whether a particular firearm is defensive or not?

4 MR. BRADY: Objection. Vague. Calls for
5 speculation. Incomplete hypothetical.

6 THE WITNESS: No. I mean a firearm is a
7 firearm and defensive is a use. It can also be
8 designed a certain way by a manufacturer to be more
9 useful in that area. But someone who is not an
10 expert, just looking at a firearm is not going to
11 say, "That is a defensive firearm."

12 MR. TRESNOWSKI: I know we just got back on.
13 Let me have five minutes and I may be able to wrap
14 up here.

15 THE WITNESS: That is fine.

16 MR. TRESNOWSKI: All right. Are we all set?

17 BY MR. TRESNOWSKI:

18 Q. We are going back on the record. Randy,
19 you understand you are still under oath?

20 A. Yes.

21 Q. You mentioned that a copy of the video
22 we looked at, the YouTube video is possibly with
23 the individual that is marketing for you?

24 A. Yes.

1 Q. And what is her name?

2 A. So the one -- the young man that passed
3 away or the woman that currently does --

4 Q. The woman that currently does.

5 A. Her name is Lauren Argo, A-R-G-O.

6 Q. And does she have a business?

7 A. She does.

8 Q. What is the name of her business?

9 A. Industrial Art and Design.

10 Q. And where is her business located?

11 A. Arkansas.

12 Q. Do you know what town?

13 A. I don't.

14 Q. Do you have a way of getting in touch
15 with her?

16 A. Yes. We talk on a regular basis.

17 Q. Other than the opinions that you've
18 discussed on this deposition and are in your
19 report, do you have any other opinions about this
20 litigation?

21 MR. BRADY: Objection. Vague.

22 THE WITNESS: Not without specifics. No, I
23 don't have other opinions.

24 BY MR. TRESNOWSKI:

1 Q. Is there any information I asked about
2 that you remember now that you didn't recall when I
3 asked the question?

4 MR. BRADY: Objection. Vague. Calls for
5 speculation.

6 THE WITNESS: I don't. I think you did a
7 pretty good job of questioning.

8 BY MR. TRESNOWSKI:

9 Q. Is there anything you would like to add
10 -- strike that. Is there anything else you would
11 like to testify that would help clarify your
12 opinion?

13 A. Without a specific question, I don't
14 know what I would say. Thank you.

15 Q. Are there any answers to my questions
16 that you wish to change before we close the
17 deposition?

18 A. Well, I was a little confused when you
19 were talking about paragraph 11B -- no, whichever
20 one was pistols. 11B.

21 So I just want to make sure you
22 understand I'm talking about a broad category of
23 pistols.

24 We start with a basic pistols,

1 and then there are features added to it. I'm
2 hoping that is what you intended.

3 Q. Well, let me explore. So let me pull
4 that up back up.

5 So I asked you if there is
6 testimony you want to change, and you said you may
7 want to change something regarding 11B.

8 MR. BRADY: Objection. Objection. Misstates
9 his testimony.

10 THE WITNESS: I don't necessarily think I want
11 to change anything. I just want to make sure you
12 understand that there are semi-automatic pistols.
13 That is where we started. And then there are
14 features to those pistols that we add on as I was
15 not sure what you were asking about at the time as
16 I thought about it over lunch.

17 BY MR. TRESNOWSKI:

18 Q. Did you provide testimony earlier about
19 the pistols that you provided in 11B that you wish
20 to change?

21 A. No. I just wanted to make sure you
22 understood there are pistols plus features.

23 Q. Okay.

24 MR. TRESNOWSKI: I have no further questions

1 at this time. I don't know if anybody else have
2 any questions?

3 MR. BRADY: Counsel, what exhibit is the one
4 that is currently up?

5 MR. TRESNOWSKI: Yes, this is Exhibit 12.

6 EXAMINATION

7 BY MR. BRADY:

8 Q. Mr. Watt, looking at subdivision -- or
9 B, on Exhibit 12 that says "Semi-Automatic pistols
10 that accept detachable magazines and have one,
11 multiple, or all of the following features." Do
12 you see that?

13 A. I do.

14 Q. Is it your testimony that the students
15 in your defensive pistol courses always bring a
16 pistol -- a semi-automatic pistol that accepts a
17 detachable magazine and has one or more of the
18 features listed thereafter: A threaded barrel, a
19 shroud, a flasher suppressor, et cetera?

20 A. They come with a semi-automatic pistol,
21 and some of them have these features on them. They
22 don't have all these features on them.

23 Q. Do some of the students that attend your
24 defensive pistol courses bring semi-automatic

1 pistols that accept detachable magazines and have
2 none of the features listed thereafter?

3 A. Sure. They come with standard pistols,
4 and there are others that have these accessories
5 for them. Exactly. That is the question that I
6 was referencing and that is his question I was
7 answering, was from that perspective.

8 People come with those pistols
9 and then there are people that have accessories
10 that show up as well.

11 MR. BRADY: I have no further questions,
12 Mr. Watt.

13 MR. TRESNOWSKI: I have a redirect question.

14 EXAMINATION

15 BY MR. TRESNOWSKI:

16 Q. It sounds like there are two categories
17 of classes. There are those that have a pistol
18 that lacks any of these features, and there are
19 those that bring a pistol that has one or more of
20 those features; is that correct?

21 A. So a pistol -- and we are talking about
22 the same thing. A pistol has a detachable
23 magazine, right? So people come with pistols with
24 detachable magazines. And then many have one or

1 more of these various features as well as basic
2 pistol magazines.

3 Q. Some have features and some don't?

4 A. Correct.

5 Q. My question is can you tell me what
6 percentage falls within each bucket?

7 A. Anecdotally, without any additional
8 stuff -- bare-bones pistol just -- the bare-bones
9 standard pistol versus an AR-style pistol, AR
10 standard pistols are less prominent than standard
11 pistols. And standard pistols have some of these
12 features as well.

13 Q. If we were to have two buckets and we
14 were going to drop all the ones without features in
15 one bucket and drop the ones with one of the
16 features in another bucket, can you tell me
17 percentage-wise in each bucket?

18 A. Anecdotally, I would say -- in the
19 pistol classes, anecdotally, I would say probably
20 60 to 70 percent are pistols without features. And
21 the others in -- yes, that is what I would say.

22 MR. TRESNOWSKI: I have no further questions
23 at this time.

24 Any other questions from any

1 other attorneys on the call?

2 THE COURT REPORTER: Can we ask about
3 signature?

4 MR. TRESNOWSKI: Yes. We do not agree to
5 waive reading.

6 THE COURT REPORTER: Signature is reserved.
7 Does anyone need the transcript.

8 MR. TRESNOWSKI: We are ordering.

9 THE COURT REPORTER: Mr. Brady, do you want a
10 copy?

11 MR. BRADY: Yes, please.

12 FURTHER DEPONENT SAITH NAUGHT
13 (Off the record at 2:09.)

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1 STATE OF ILLINOIS)
) SS:
2 COUNTY OF COOK)

3 I, Deborah A. Duffy, CSR, RPR, do hereby
4 certify that STEVEN RANDALL WATT was duly sworn by
5 me to testify the whole truth, and that the
6 foregoing deposition was recorded stenographically
7 by me and was reduced to computerized transcript
8 under my direction, and that the said deposition
9 constitutes a true record of the testimony given by
10 said witness.

11 I further certify that the reading and
12 signing of the deposition was not waived, and that
13 the deposition was submitted to Michael Tresnowski,
14 defendant's counsel, for signature. Pursuant to
15 Rule 30(e) of the Federal Rules of Procedure, if
16 deponent does not appear or read and sign the
17 deposition within 30 days, the deposition may be
18 used as fully as though signed, and this
19 certificate will then evidence such failure to
20 appear as the reason for signature not being
21 obtained.

22 I further certify that I am not a relative or
23 employee or attorney or counsel of any of the
24 parties, or a relative or employee of such attorney
or counsel, or financially interested directly or
indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my
hand this :

Deborah A. Duffy

Deborah A. Duffy, CSR, RPR
Illinois CSR License 084-002516

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July 25, 2024

To: Mr. Sean Brady, Esq.

Case Name: Barnett, Caleb, Et Al. v. Raoul, Kwame, Et Al.

Veritext Reference Number: 6778677

Witness: Steven R. Watt Deposition Date: 7/2/2024

Dear Sir/Madam:

Enclosed please find a deposition transcript. Please have the witness review the transcript and note any changes or corrections on the included errata sheet, indicating the page, line number, change, and the reason for the change. Have the witness' signature notarized and forward the completed page(s) back to us at the Production address shown above, or email to production-midwest@veritext.com.

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

Sincerely,
Production Department

NO NOTARY REQUIRED IN CA

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DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6778677
CASE NAME: Barnett, Caleb, Et Al. v. Raoul, Kwame, Et Al.
DATE OF DEPOSITION: 7/2/2024
WITNESS' NAME: Steven R. Watt

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 Steven R. Watt

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: 6778677
CASE NAME: Barnett, Caleb, Et Al. v. Raoul, Kwame, Et Al.
DATE OF DEPOSITION: 7/2/2024
WITNESS' NAME: Steven R. Watt

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 Steven R. Watt

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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ERRATA SHEET
VERITEXT LEGAL SOLUTIONS MIDWEST
ASSIGNMENT NO: 6778677

PAGE/LINE(S) / CHANGE /REASON

Date Steven R. Watt

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DAY OF _____, 20_____ .

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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.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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