

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

CALEB BARNETT, et al.,	)	Case No. 3:23-cv-209-SPM
Plaintiffs,	)	**designated Lead Case
	)	
v.	)	
	)	
KWAME RAOUL, et al.,	)	
Defendants,	)	
	)	
<hr/>	)	
DANE HARREL, et al.,	)	Case No. 3:23-cv-141-SPM
Plaintiffs,	)	
	)	
v.	)	
	)	
KWAME RAOUL, et al.,	)	
Defendants,	)	
	)	
<hr/>	)	
JEREMY W. LANGLEY, et al.,	)	Case No. 3:23-cv-192-SPM
Plaintiffs,	)	
	)	
v.	)	
	)	
BRENDAN KELLY, et al.,	)	
Defendants,	)	
	)	
<hr/>	)	
FEDERAL FIREARMS LICENSEES OF ILLINOIS, et al.,	)	Case No. 3:23-cv-215-SPM
Plaintiffs,	)	
	)	
v.	)	
	)	
JAY ROBERT "J.B." PRITZKER, et al.,	)	
Defendants.	)	
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**DECLARATION OF DAVID LOMBARDO**

I, David Lombardo, declare as follows:

1. I am at least 18 years old and have personal knowledge of the statements contained in this Declaration.

2. The statements contained in my expert report that I authored in this case, dated May 10, 2024, and attached hereto as **Exhibit A**, are true and accurate.

3. If called to testify at trial in this case, I would testify to the matters set forth in my expert report provided in the above-captioned cases. My testimony would be consistent with all of the statements in the report, which included a complete statement of all opinions expressed, the basis and reasons for such opinions, the facts and data considered by me in forming said opinions, discussion about and identification of my qualifications as an expert witness (including any publication I may have authored in the previous 10 years and any cases during the previous 4 years where I may have testified as an expert at trial or by deposition), and a statement of compensation paid to me for study and testimony in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 13, 2024 within the United States.

/s/ David Lombardo  
David Lombardo  
Declarant

## **EXPERT REPORT OF DAVID LOMBARDO**

**Subject Matters:** The common and suitable use of firearms, which are banned under the Protect Illinois Communities Act, for lawful purposes, including self- and home defense, hunting and recreational target shooting.

**Qualifications:** I, David Lombardo, am the Founder and President of Safer USA, an organization dedicated to providing knowledge and training on the safe and responsible use of firearms for self-defense and recreation by law-abiding citizens. I am an Illinois Certified Firearms Instructor, an NRA Law Enforcement Instructor and an NRA Training Counselor on pistols, rifles, shotguns, home firearms safety, personal protection in the home and personal protection outside the home. I am also the former Executive Director and President of the Clyde Howell NRA Youth Shooting Sports Camp and the former President of the Aurora Sportsmen's Club. I have personally taught firearms safety and firearms use to both experienced and novice shooters and have extensively interacted with the gun owning public in a variety of ways for more than 35 years. I am qualified to testify on the types of firearms that are commonly and appropriately owned for lawful purposes, including self- and home defense, hunting and recreational shooting. My qualifications are further described in the *curriculum vitae* attached as Exhibit 1.

**Opinions, Bases and Material/Facts Considered:** Based on my personal knowledge and many years of first-hand experience and observation, many of the firearms banned under the Protect Illinois Communities Act, including various semi-automatic pistols and shotguns, and semi-automatic rifles built on AR- and AK-platforms are commonly owned by residents of Illinois and elsewhere for lawful and non-military purposes, including self- and home defense, hunting and recreational target shooting. This includes firearms with the ability to accept detachable magazines with capacity greater than 10 rounds (rifles) and 15 rounds (pistols). These magazines are also commonly owned for such lawful purposes. I have personally owned these firearms and magazines, and observed their use by many thousands of Illinois citizens.

For example, the most popular and commonly owned firearms today are rifles built on an AR-platform designed to accept detachable magazines. Many hundreds (if not thousands) of my students' choices and my personal observations of countless persons on, for example, the range further underscores this point. The popularity of these rifles is based, in part, on their modular design. They have an upper receiver into which the barrel is mounted and a lower receiver that holds the firing assembly and onto which the butt stock and lower grip are mounted. The two receivers can be disconnected easily, allowing the shooter to mount a different upper receiver and barrel and thus use a wide variety of rifle cartridges and change the length and weight of the barrel to suit the shooter's needs. Because of its adaptability, a single AR-type rifle can be used for target matches, home defense, and various types of game hunting.

By way of further example, the popularity of AR-platform rifles is due not only to their ready adaptability for different uses, but also because AR-platform rifles are lighter in weight, shorter in length and have less recoil than most traditionally-styled wooden-stock semi-automatic rifles, making them easier to handle and shoot. They are also very accurate and reliable. Many of the most commonly owned AR-platform rifles are chambered for .223 ammunition, a relatively inexpensive rifle cartridge that is particularly well-suited for self- and home defense purposes. Although the .223 round has sufficient stopping power in the event a home intruder is encountered, the round loses velocity relatively quickly after passing through walls and other objects, thus

decreasing the chance that errant shot inadvertently strikes an unintended target in a home defense situation. Further, the right home defense firearm is the firearm with which an individual homeowner has the most familiarity and comfort, and AR-platform rifles are an excellent and commonly made choice, and I instruct my students on their characteristics, function, virtues and I recommend their use for personal defense.

Semi-automatic pistols and shotguns, and semi-automatic rifles built on an AR-platform are manufactured and sold for civilian use by many of the most well-known firearm manufacturers in the world, including Beretta, Colt, Sig Sauer, Smith & Wesson, and Ruger. In addition, there are many lesser-known manufacturers producing these rifles in substantial numbers to meet the shooting public's demand, including Anderson, Bushmaster, Rock River Arms, and ArmaLite. Review of these manufacturers' websites and [www.gunbroker.com](http://www.gunbroker.com) confirms this point. In fact, "AR" stands for ArmaLite, whose engineers developed the technology in the 1950's for the firearms that are now rightly considered modern sporting rifles.

Semi-automatic pistols, shotguns, and AR-platform rifles are also appropriately and commonly used for typically small game hunting for many of the same reasons they are well-suited for self- and home defense—accuracy, reliability and ease of handling. They are also used in the very popular "3 Gun" shooting competitions, the fastest growing shooting sport in the country, in which shooters use a pistol, a shotgun, and an AR-platform rifle to move through different stages and engage different targets from a variety of positions.

Regarding the firearm design features that Illinois has chosen to ban, including the capacity to accept a detachable magazine, pistol grips and thumbhole stocks; protruding grips; folding, telescoping and thumbhole stocks; so-called "barrel shrouds" and flash suppressors, and buffer tubes or arm braces. These features are typically integral to safe firearm handling and enable the shooter to accurately and reliably use his gun.

The presence on a firearm of one or more of the features that Illinois has chosen to ban and criminalize improve the safe operation, function and handling of the firearm.

Based on my extensive interaction with the shooting public and my knowledge of firearms and magazines, their characteristics, and their safe and appropriate uses, it is my opinion that Illinois has chosen to ban and criminalize ownership of categories of firearms and magazines that are commonly owned by law abiding citizens throughout Illinois and across the country for entirely lawful and non-military purposes.

**Exhibits to Summarize or Support Opinions:** A video summarizing and supporting my opinions and demonstrating the operational and functional features and purposes of various types of firearms and magazines is produced as Exhibit 2.

**Publications:** See Exhibit 1.

**Prior Testimony:** See Exhibit 1.

**Compensation:** I am compensated at a rate of \$450 per hour.

Dated: May 10, 2024.

/s/ David A. Lombardo  
David A. Lombardo

# Curriculum Vitae DAVID A. LOMBARDO

SAFER USA Consulting Group  
Shorewood, Illinois 60404

815-741-3474; david@guntestimony.com; [www.guntestimony.com](http://www.guntestimony.com)

*Consulting & Expert Testimony to The Firearm Industry in Civil and Criminal Action*

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### **COURT QUALIFIED EXPERT WITNESS**

- in the design, maintenance, operation, use and human factors interface of firearms
- Shooting range and club (including IRS 501C non-profit) management
- Systemic safety management systems and standard operating procedures
- Training program design and implementation

### **TESTIMONIALS**

I have been a criminal defense trial attorney for 42 years. I have enlisted the professional assistance of David Lombardo and SAFER USA on more than one occasion. Mr. Lombardo's expertise in the field of firearms is unparalleled. I have had to consult firearms experts on many occasions over the years, and legal issues frequently arise in shooting cases. Mr. Lombardo has thorough knowledge of all issues in this field and is skilled in translating technical matters into clear and understandable language. I highly recommend Mr. Lombardo and his company. Attorney Dennis Doherty, Law Office of Dennis Doherty, Chicago, IL.

"Mr. Lombardo's evaluation was critical in resolving a child endangerment offense involving a firearm's negligent discharge. He quickly identified the significant facts, some of which were not immediately apparent. I highly recommend him to anyone needing expert testimony or insight!" Attorney Johnathan Sears, "Clark & Sears Law, PLLC, Des Moines, IA

"I engaged David Lombardo as a firearm expert in a federal case in the Northern District of Illinois. The case required an expert who could compare what appeared to be a gun in the defendant's hand in a video with a firearm recovered in a residence that the defendant was in just after the video was taken. Dave put great care into his work and carefully reviewed the video with the recovered firearm. He pulled from his knowledge of firearms, firearm manufacturers and researched airsoft guns and other matters essential to the case. His work assisted in convincing the prosecution to drop the case. He was a pleasure to work with, has a wonderful demeanor, is responsive and was patient with all my questions. I highly recommend using David as a firearm's expert." Attorney Gabrielle R. Sansonetti, The Law Office of Gabrielle R. Sansonetti, Chicago, IL

"I have had the pleasure of working with David Lombardo of SAFER USA as my expert witness in a major felony trial in Effingham County this past August. David's expertise and communication skills carried the day on the major issues of the trial. He is a pleasure to work with and has a quick understanding of the facts and issues that allows him to get the right message effectively across to the jury. I would always recommend David to the trial bar whenever and wherever the issue of forensic firearms, and ballistics are before the court and the jury." Attorney Monroe McWard, McWard Law Office, Springfield, IL

"David Lombardo testified as a gun safety expert on behalf of McHenry County Conservation District. Lombardo was tendered as an expert and was accepted as same by the Court. The Court finds Lombardo to be a highly qualified, credible expert witness in the field of gun safety." – The Honorable Kevin G. Costello. McHenry County Conservation District v. Brinkman. Circuit Court of the 22<sup>nd</sup> Judicial Circuit McHenry County, Illinois.

"Lombardo produced a video for use in court that was highly effective at clarifying the differences between the AR-15 and military weapons. The visual and narrative were most compelling. Job well done." Victor D. Quilici, Attorney. Matthew D. Wilson v. Illinois.

"My client was accused of the first-degree murder of his wife but claimed the gun fired by itself. Lombardo's knowledge of human factors as it related to the firearm explained in a credible manner how the firearm was discharged accidentally by the client. His Report was crucial in having the charge reduced to a negligent homicide." Ted Gailan, attorney. Illinois v. George Kleopa.

“Mr. Lombardo’s testimony was essential to resolving a hard-fought case involving a shooting which resulted in serious injuries to our client. His expertise in the field of firearms and his attention to detail to the facts in our case played an important role in our success.” Attorney Michael J. Sorich, “Cavanaugh Law Group; Chicago, IL

### **CERTIFICATION & QUALIFICATION**

- NRA Club Leadership and Development Certificate
- NRA Range Development & Operations Certificate – Design ranges maximizing safety protocols
- NRA Training Counselor/Instructor – Teach all NRA courses plus train & certify instructors
- NRA Chief Range Safety Officer – Develop SOPs, Train & Supervise Range Safety Officers
- Illinois Certified Firearms Instructor
- Illinois Concealed Carry Instructor
- Utah Concealed Carry Instructor
- NRA Law Enforcement Instructor (Handgun)
- NRA Regional Counselor - Refuse to Be A Victim program
- Chicago Firearm Certification Instructor (entire duration of the program)
- Illinois Hunter Safety Master Instructor (6/00 – 6/05)
- U.S. Army Marksman (Rifle)
- NRA Marksmanship Qualification: Distinguished Expert Handgun

### **APPLICABLE EXPERIENCE**

- Extensive public speaking experience
- Translating technical jargon into easy-to-understand language
- Excellent management crises interface with press & public briefings, email & video
- Extensive training experience including video recording individuals for future review
- Video production script writing, shooting, editing & talent (teleprompter & ear prompter proficient)

### **EDUCATION**

#### **University of Illinois; Urbana, IL**

- Ph.D. coursework only in Counseling Psych emphasis on human factors
- M.Ed. Vocational/Technical Education emphasis on safety program development
- B.S. Industrial Education emphasis on curriculum design/development
- Institute of Aviation graduate Professional Pilot and Aircraft Maintenance Curricula

### **ADDITIONAL TRAINING**

Sep 23, 2023 Gun Rights Policy Conference (16 hrs)  
 Dec 11, 2020 NRA-ILA Firearms Law & Second Amendment Symposium  
 Apr 23, 2019 Two-Day Pistol (16 hrs) John McPhee SOB Tactical  
 Sep 17, 2018 Carbine Course (8 hrs) John McPhee SOB Tactical  
 Jun 3, 2017 Combat Focus Shooting Carbine(8 hrs)Barret Kendrick. I.C.E.  
 May 10, 2016 Combat Focus Shooting Pistol (16 hrs)Rob Pincus. I.C.E.  
 May 23, 2015 Tactical Rifle I (4 hrs) – Eric Callis. SAFER USA, Inc  
 May 23, 2015 Tactical Rifle II (4 hrs) – Eric Callis. SAFER USA, Inc  
 Nov 29, 2014 Platform Rifle (4 hrs) – Eric Callis. SAFER USA, Inc  
 Aug 30, 2014 Instructor Defensive Tactics/Handcuffing(4 hrs)Jeff Gregorec. Lamperd Less Lethal  
 Aug 29, 2014 Instructor Monadnock Expandable Baton(4 hrs) Jeff Gregorec. Safariland Monadnock.  
 Aug 29, 2014 Instructor OC Pepper Spray Instructor Course(4 hrs) Jeff Gregorec Fox Labs Int’l  
 Aug 23, 2014 Instructor Shotgun Defender 1&2;.50 Cal(4 hrs)Jeff Gregorec Lamperd Less Lethal  
 Apr 27, 2011 The Bulletproof Mind (7 hrs) LTC Dave Grossman. TriRiver Police Training Region  
 Apr 10, 2011 Armed Citizens’ Rules of Engagement (20 hrs). Massad Ayoob. Massad Ayoob Group



Feb 23, 2011 Firearm Trn: Revolver, Semi-auto, Rifle & Shotgun. IL Dpt of Financial & Prof Reg  
Nov 19, 2010 Law Enforcement Handgun Instructor (48 hrs). NRA Law Enforcement Division  
Jul 20, 2006 Underwater Egress Training (8 hrs). Stark Survival Training.  
Jul 19, 2006 Open Water Survival Training (12 hrs). Stark Survival Training.  
Feb 29, 2000 Glock Armorer's Course (8 hrs). Glock Firearms.  
Jul 11, 1999 Advanced Handgun Skills (24 hrs) Massad Ayoob Lethal Force Institute  
May 15, 1999 Hazmat Awareness Course (8 hrs). Illinois Emergency Management Agency.  
Mar 10, 1998 Verbal Judo (8 hrs). Northeast Multi-Regional Law Enforcement Training.  
Dec 16, 1997 Edged Weapons Defense Training (8 hrs). Tri-River Police Training Region.  
Nov 23, 1996 Use of Force Protocol Training (24 hrs). Will County Sheriff's Dept  
Apr 13, 1996 Part time/Reserve Law Enforcement Training (250 hrs) TriRiver Police Trng Region  
Jul 2, 1994 40-hr Firearms Training State of IL Law Enforcement Officers Training Board.

### **INSTRUCTION**

#### **NRA**

Basic Pistol  
Basic Rifle  
Basic Shotgun  
Home Firearm Safety  
Personal Protection in the Home  
Personal Protection outside the Home  
Range Safety Officer  
Chief Range Safety Officer  
Metallic Cartridge Reloading  
Shotgun Shell Reloading  
Refuse To Be A Victim  
Basic Instructor Training  
Instructor courses for all of the above

#### **OTHER**

Illinois Concealed Firearm License (8 & 16 hr and 3 hr renewal)  
Home Protection & Concealed Carry Seminar  
State of Illinois 40-hour Armed Security program  
Winchester Marksmanship Qualification Program: Handgun  
Winchester Marksmanship Qualification Program: Rifle  
Chicago Firearm Certification (duration of program)  
Utah Concealed Carry  
Florida Concealed Carry (practical)  
Long Range Rifle  
Tactical Pistol  
Tactical Carbine  
Basic Practical Ballistics

### **RELATED EXPERIENCE**

**1988 - Present National Rifle Association (Endowment Life member)**

**12/93 - Present Illinois State Rifle Association (Life member)**

Vice President (2020-2023)

Board of Directors (2017 – present)

Past Chairman Will County Grassroots Chapter

**10/20 - Present Illinois State Rifle Association Political Victory Fund**

Director of Communication  
**2014 – 2018 Fox Valley Friends of the NRA Committee member**

**10/11 – Present Aurora Sportsmen’s Club (Waterman, Illinois) - Member**

- **10/11 - 1/20 President** – I and a few dedicated board members resolved two inherited lawsuits by the Illinois Attorney General, about 1,000 members and declining with an average age of 61.
- Reversed negative cash flow and over \$1.0 million in debt which included 250 acres with 10 ranges and shotgun sports with sparse infrastructure including dirt roads that turned into mud pits in the rain and a terrible social media reputation.
- Did total turn around by the time I left office: 285 acres, 22 ranges, expanded shotgun sports, 2500 members average age 50
- Improved the financial picture to include a \$4.1 million appraised facility with a \$1.1 million annual operating budget, lawsuits resolved and nationally recognized instructors teaching.
- We now have every known shooting sport, upland and waterfowl hunting, an extensive education program and active community involvement.
- **1/13 – 9/16 Chief Range Safety Officer** – Developed a comprehensive Safety Management system.
  - Developed and implemented a corporate wide safety management system including Range Safety Officers, Emergency Response Team and Security Team  
 Invested in bullet wound trauma kits at every shooting position and an airlift evacuation plan to a Level 1 Trauma Center.

**9/11 – 10/11 Vice President**

**1/10 – 9/11 Board of Directors**

**1/16 – 1/23 SHOT Show TV News Anchor**

National Shooting Sports Foundation programming goes to all Las Vegas hotels, all over the show floor, on the dedicated busses and on YouTube

**6/90 – 8/91 Wood County, Ohio, Sheriff's Auxiliary, Special Deputy**

1/22/91 FBI Domestic Counter-Terrorism Briefing (4 hrs)

4/13/91 Ohio Peace Officer Seminar: Control Non-Violent Crowds, Confronting hostile Crowds & Riot Formations (4 hrs)

6/3-8/91 USAF/USCG Inland Search & Rescue School. Madison, WI (40 hrs)

6/25-27/91 Review, briefing & eval of Army ROTC Leadership Assessment Program. Fort Knox, KY (45 hrs)

7/13/91 HazMat Awareness Level. Ohio Fire Academy, Bowling Green, OH (6 hrs)

**4/93 – 11/11 Will County Sheriff's Department Auxiliary Deputy**

8/03–11/11 Sergeant & Executive Board member

5/97–11/11 Background investigations

4/93-11/11 Auxiliary Deputy Training

12/10/05 CDP/AED refresher training (4.0 hrs)

01/29/04 Tactical training (simunition) (4.0 hrs)

01/27/04 Use of deadly force and floor fighting (4.0 hrs)

04/15/03 Hazmat refresher (1.0 hr)

03/22/03 Tactical firearms: Use of shield & move-and-shoot (4.0 hrs)

03/22/03 Active Shooter Immediate Action Rapid Deployment (4.0 hrs).  
 02/20/03 CPR & AED recertification (8.0 hrs)  
 05/17/02 Incidents Involving Subjects w/Mental Illness(2.0 hr).  
 05/14/02 Hazardous Materials Awareness Refresher Training (4.0 hr).  
 05/14/02 Clandestine Laboratory Awareness (3.0 hrs).  
 03/12/02 Active Shooter Immediate Action Rapid Deployment (6.0 hrs).  
 01/17/02 Building Searches (5.0 hrs).  
 01/15/02 Building Searches (4.0 hrs).  
 11/17/01 Use of force refresher & night shooting (8.0 hrs).  
 10/16/01 Tactical Firearms Training: pistol & shotgun (2.0 hr).  
 09/20/01 Strategies & Tactics of Patrol Stops (S.T.O.P.S.) (8.0 hr).  
 04/26/01 Sexual, Ethnic, Racial or Religious Harassment (2.0 hr).  
 04/24/01 Hazardous Materials Awareness Refresher Training (4.0 hr).  
 08/24/00 Ethics and Policing (2.0 hr).  
 08/22/00 Hazardous Materials Awareness Refresher Training (4.0 hr).  
 08/22/00 Sexual, Ethnic, Racial or Religious Harassment (2.0 hr).  
 07/14/00 Automated External Defibrillator certification (3.0 hrs)  
 04/18/00 Gang Awareness Training (1.5 hrs)  
 02/21/00 CPR Recertification (3.0 hrs)  
 01/18/00 Managing Force Escalation (0.75 hr)  
 11/07/99 Tactical Firearms (8.0 hr)  
 05/15/99 HazMat Awareness Hazardous Waste & Emergency Response Trng (8.0 hr).  
 05/01/99 Sexual, Ethnic, Racial or Religious Harassment (2.0 hr).  
 05/01/99 Blood-borne Pathogens (1.0 hr).  
 05/01/99 Police Ethics (1.0 hr).  
 10/03/98 Motor Vehicle Pursuit, Emer/Hi Speed Response Termination Devices (3.0 hrs)  
 03/10/98 Verbal Judo; Northeast Multi-Regional Training, Inc. (8.0 hrs)  
 12/16/97 PPCT Edged Weapon Defense; Flores LEO/Security Consultants (8.0 hr)  
 05/20/97 AIDS Awareness/Prevention for Emergency Services Personnel (0.5 hr)  
 04/15/97 Severe Weather Spotter certification - Will County Emergency Mgmt (1.0 hr)  
 02/18/97 Use of Seat Belts and Crash Survival (0.5 hr)  
 02/18/97 Protection: Filipino-style Knife Tactics (0.5 hrs)  
 01/21/97 Disguised & Street Weapons (0.5 hrs)  
 11/23/96 Use of Force Protocol Training (24 hrs)  
 05/04/96 ASP Baton certification (8 hrs)  
 04/13/96 Tri-River Police Trng: 250-Hr Part-Time LEO (Scholastic- 3rd Place 95.5%)  
 06/20/95 Oleoresin Capsicum certification (2 hrs)  
 02/21/95 Gang Awareness training (1 hr)  
 08/14/94 Building Search training exercise (16 hrs)  
 04/05/93 Firearm Qualification Course (40 hrs)

#### **6/99 - 10/11 Howell Shooting Club**

11/03 – 10/11 President & member of the Board of Directors.  
 Developed new Constitution, By-laws, Operating Rules and developed a range safety management system.

11/02 – 11/03 Vice president & member of the Board of Directors, Membership Chairman, develop bylaws and organizational chart for Youth Shooting Camp. Organize and staff promotional booth at numerous trade shows.

8/02 – 11/02 Range Safety Office & member of the Board of Directors  
 Develop Range Safety protocols and standard operating procedures.

**01/92 – 05/93 Society of Automotive Engineers**

Member Aviation Simulation & Safety Operations Committee

**11/91 – 05/93 Illinois Transportation Research Center; Illinois Department of Transportation**

Executive Board & member – Safety Research Committee

**09/91 – 08/95 Council on Aviation Accreditation**

Site visitation team members – Flight safety specialist

**09/91 – 08/95 University Aviation Association**

Member – Ab Initio Pilot Training Committee

**04/90 – 08/95 Federal Aviation Administration**

Chair – 5-year Task Force to formulate certification requirements, training allowances, safety program development and Level 1-3 Flight Training Devices qualification

**01/90 – 01/92 Federal Aviation Administration**

FAA working committee on the AC 120-45A Airplane Flight Training Devices revision.

**03/89 – 01/92 Federal Aviation Administration - Booz Allen Hamilton Study**

Flight Safety Specialist for “Futures” discussion panel to review FAA regulations Part 61, 141, and 143.

**02/89 – Present Federal Aviation Administration - Booz Allen Hamilton Study**

Flight Safety Specialist for review of multiengine flight instructor task analysis

**10/86 – 10/93 UAA Simulation Committee Chairman**

Provide a presence, resource, and source of advice and counsel for safety of flight issues within air traffic control environment.

**12/79 – 12/00 Federal Aviation Administration – Aviation Safety Counselor**

Assist in the development of the FAA Airworthiness Accident Prevention Program. Perform flight safety checks, conduct safety clinics, attempt to correct and/or report safety hazards on or about airports, serve as a safety resource counselor to all interested pilots and non-pilots. Associated with FAA General Aviation District offices in St. Louis, MO; Decatur, IL; Chicago, IL; and Shreveport, LA

**ORGANIZATIONAL AFFILIATIONS**

Association of Aviation Psychologists

Civil Air Patrol, Illinois Wing (Captain)

- Wing Staff Operations Officer (1 year)
- Commander Group V (2 years)
- Operations & Safety Officer Group IX (2 years)

Flying Illini, Inc. (100-member non-profit flying club)

- President (7 years)
- Chief Flight Instructor & Safety Officer (4 years)
- A&P Mechanic (2 years)

Greater St. Louis Flight Instructor Association

- Board of Directors (1 year)
- Chief Instructor (1 year)

Human Factors Society

Illinois Pilot's Association – Charter member (5 years)  
Board of Directors (2 years)

National Association of Flight Instructors

### **PRESS INTERVIEWS**

08/26/23 (Television) *Two women shot in the Chicago White Sox stadium*. NBC5 News  
08/26/23 (Television) *Shots Fired! Chicago White Sox stadium*. Telemundo  
05/09/23 (Videocast) *The Assault Weapon Myth*. Frontline with Carl Higbie.  
01/12/23 (Videocast) *ISRA Files Federal Lawsuit on Assault Weapons Ban*. NextNewNetwork.com – Gary Franchi.  
01/09/23 (Videocast) *Illinois Assault Weapon Ban*. Let The Truth Be Told. Truthnetwork.com, Dr David Lowery.  
06/20/22 (Television) *Crime Stories with Nancy Grace: Mommy says 2-y-o Juelz, Shoots Self in Head: NO WAY! Ballistics* -Ballistics Expert. Fox Nation  
02/16/22 (Television) *Here are 10 times legal gun owners recently thwarted crimes in life – threatening situations*. Third party quoted me in New York-based Fox News article.  
02/01/22 (Podcast) Close Up Radio- Doug Llewelyn. *Spotlight David Lombardo of SAFER USA*.  
01/20/22 (Radio) The Mike Gallagher Show – Salem Network Radio. *Chicago Mayor Cuts Police Budget and Increases Police Guard Around Her Home*  
12/16/21 (Radio) Anna Davlantes Show – WGN Radio 720. *Man Shoots Dog, Saves Jogger being attacked*  
12/16/21 (Newspaper) Chicago Tribune – Katherine Rosenberg-Douglas. Sheriff: 2 Rottweilers used jogger 'like a chew toy' in St. Charles attack.  
11/06/21 (Podcast) Conservative Coffee Hour – *The Second Amendment in Illinois*  
10/22/21 (TV) NBC 5 Chicago–*Industry Experts Baffled by Baldwin Deadly Movie Accident*. Chris Hush  
06/29/20 (Newspaper) New York Post – *Safety experts blast gun-toting St. Louis couple*. Bruce Golding.  
06/27/20 (Blog) Keep & Bear Arms – *Guns are flying off the shelf*.  
06/26/20 (Radio) John Howell Show – WLS Chicago, *Illinois FOID Card & Concealed Carry Licensing*  
06/25/20 (Podcast) Rebuild Illinois (1.0 hours) *Black Lives Matter & Defunding Police*  
06/24/20 (Radio) Roe Conn Show – WGN Chicago. *Sound of fireworks verses gun shots*  
08/30/18 (Newspaper) Kendall County Record – *Panel rejects rule changes at gun ranges*. Tony Scott  
08/20/18 (Newspaper) Crain's Chicago Business. *The Trump Slump*. H. Lee Murphy  
06/17/18 (Newspaper) Chicago Tribune. *A blind spot in Illinois concealed carry*. Kate Rosenberg-Douglas  
06/15/18 (Video) Chicago Tribune. *Almost nothing is known about dozens of concealed carry shootings in Illinois. Why?* - Katherine Rosenberg-Douglas & Jennifer Smith Richards

### **PRESENTATIONS**

11/01/23 Social Studies (2) Lake Forest College (Lake Forest) Second Amendment Historical Perspective  
02/27/23 XLine Sportsmen's Club (Kankakee, IL) *The Role of Advocacy in a Hostile Legislature*  
02/10/23 Lady Watchdogs (Hennepin, IL) *Assault Weapon Ban Litigation Update*  
01/12/23 South Suburban Grassroots (Midlothian, IL) *Illinois Assault Weapons Ban Strategy Briefing*.  
01/02/23 Crete Gun Club ((Crete, IL) *This is the ISRA*  
11/07/22 Freedom Summit (Chicago) *Status of the Second Amendment*

10/19/22 ISRA Will County Grassroots Chapter (Elwood, IL) *This is the ISRA*  
 07/14/22 South Suburban Grassroots (Midlothian, IL) – *Why Accidents Aren't*  
 11/16/21 Northwest Suburbs Grassroots (Elgin) *This is the ISRA*  
 11/14/21 Downers Grove Sportsmen's Club (Morris) *This Is the ISRA*  
 11/06/21 Freedom Summit (Chicago) *State of the Second Amendment in Illinois*  
 10/26/21 Frankfort Sportsmen's Club (Mokena, IL) - *Why Accidents Aren't*  
 10/16/21 761<sup>st</sup> Gun Club of Chicago (Chicago, IL) – *Why Accidents Aren't*  
 10/13/21 Chicago Republican Party (Chicago, IL) – *Review of Illinois Legislative Initiatives*  
 09/28/21 State Line Rifle Club (Round Lake Park, IL) – *Why Accidents Aren't*  
 09/27/21 Homer Township Republicans (Homer Glen, IL) – *Truth About the Second Amendment*  
 07/27/21 State Line Rifle Club (Round Lake Park, IL) – *Review of Illinois Legislative Initiatives*  
 03/29/21 Homer Township Republicans (Homer Glen, IL) – *Personal Safety & Second Amendment*  
 02/13/21 Ambassador Academy (Orlando, FL) – *Crises Management*  
 01/21/21 Will County Republican Central Comm (Lockport)–*Review Illinois Legislative Initiatives*  
 01/16/21 South Suburban Grassroots (Midlothian, IL) – *Maintaining a Safe Shooting Event*  
 12/10/20 South Suburban Grassroots (Midlothian, IL) – *Why You Don't Want Your Day in Court*  
 11/14/20 Second Amendment Rallye (Elmhurst, IL) - *Developing a Culture of Winning*  
 09/16/20 Will County ISRA Chapter (Elwood, IL) – *The Culture of Firearm Safety*  
 05/04/20 Ambassador Academy (Orlando, FL) – *Handling the Press in High Stress Situations*  
 04/22/20 Will County ISRA Chapter (Elwood, IL) – *Concealed Carry Use of Force*  
 04/03/19 Ambassador Academy (Orlando, FL) – *Crises Management*

#### **PUBLISHED BOOKS**

Lombardo, David A. (1988) *Aircraft Systems: Understanding Your Airplane*, Blue Ridge Summit, PA, TAB Books, Inc.  
 Lombardo, David A. (1993) *Advanced Aircraft Systems* Blue Ridge Summit, PA, McGraw-Hill, Inc.  
 Lombardo, David A. (1994) *Sistemas de Aeronaves (Spanish Version)* NYC, NY, McGraw-Hill,  
 Lombardo, David A. (1994) “Alternative Training Systems” *Vertical Flight Training*, Mountain View, CA, (pp 131-145), NASA Ames Research Center  
 Lombardo, David A. (1998) *Aerospace Facts and Figures 1998-1999* Washington, DC, Aerospace Industries Association of America, Inc.  
 Lombardo, David A. (1999) *Aircraft Systems [Chinese Version]* New York City, NY, McGraw-Hill, Inc.  
 Lombardo, David A. (1999) *Aerospace Facts and Figures 1999-2000* Washington, DC, Aerospace Industries Association of America, Inc.

#### **PUBLISHED ACADEMIC REFEREED JOURNAL PAPERS**

Cowling, D.H., N.M. Witriol, and D.A. Lombardo. “An Emergency Illumination System for Emergency Night Landing by Light Aircraft. “*Journal of the Illuminating Engineering Society.*” (Summer 1987)

Lombardo, David A. “Use of Microprocessors Based Simulation in Research and Training.” *Proceedings of the Fourth International Symposium on Aviation Psychology.* (April 27-30, 1987)

Lombardo, David A. “Effectiveness of Computer-Based Flight Simulation. “*University Aviation Association Collegiate Aviation Review.* (September 1993)

#### **PUBLICATIONS CITING MY WORK (Google Scholar)**

ScienceDirect, Simulation Modelling Practice and Theory 15 (2007). “A simulation of aircraft fuel management system” *Juan F. Jimenez, Jose M. Giron-Sierra, C. Insaurralde, M. Semina.* Jan 2007



Estimation des masses, des centres de gravite ainsi que des moments d'inertie de l'avion Cessna Citation X (etsmtl.ca) – citing: *"Taking training outside the (simulator) box.* Aviation International News. February 2004.

Modeling novel methodologies for unmanned aerial systems – Applications to the UAS-S4 Ehecatl and the UAS-S45 Balaam (Chinese Journal of Aeronautics, 2019)– citing *"Taking training outside the (simulator) box.* Aviation International News. February 2004.

Journal of Aviation/Aerospace Education & Research, 1993. *Transfer of learning effectiveness: PC-based flight simulation.* GA Ortiz

The Collegiate Aviation Review International (Harvard), 1993. *Effectiveness of Computer-based Flight Simulation.* DA Lombardo

TRB Annual Meeting, 2002. *Insurers Push for Maintenance Technician Recurrent Training.* DA Lombardo, Aviation International News, 2002.

### **PUBLISHED FEATURES & EDITORIAL ARTICLES**

- Lombardo, David A. Flight Crew Training.* Aviation International News. Aug 2001.
- Lombardo, David A. Fatigue a Factor in Wellstone Crash?* Aviation International News. 2003.
- Lombardo, David A. Online Study Researches Aircrew Stress Levels.* Aviation International News. Mar 2004.
- Lombardo, David A. "Taking training outside the (simulator) box.* Aviation International News. February 2004.
- Lombardo, David A. Fatigue detection system can preempt human error.* Aviation International News. July 2007.
- Lombardo, David A. "15<sup>th</sup> Annual Clyde Howell Youth Shooting Camp. Illinois Shooter."* Spring 2013.
- Lombardo, David A. "When Did Government Lose Its Sanity?"* Illinois Shooter. Spring 2015
- Lombardo, David A. "Illinois Concealed Carry–The Will of the People?"* Illinois Shooter. Summer 2013
- Lombardo, David A. "Putting Your Money Where Your Mouth Is."* Illinois Shooter. Fall 2013
- Lombardo, David A. "Home Invasion."* Illinois Shooter, Winter 2014.
- Lombardo, David A. "Federal Prosecution of Gun Laws."* Illinois Shooter, Winter 2015
- Lombardo, David A. "The Role of Gender in the Training Environment."* Illinois Shooter, Fall 2016.
- Lombardo, David A. "Common Sense Gun Laws, Aren't.* Illinois Shooter, Spring 2016
- Lombardo, David A. "I wouldn't Hang My Hat on Gun Control.* Illinois Shooter, Spring 2016
- Lombardo, David A. "Reaching Out: Non-Traditional Shooters."* Illinois Shooter, Winter 2008
- Lombardo, David A. "Reaching Out: Working with Volunteers."* Illinois Shooter, Spring 2009
- Lombardo, David A. "Reaching Out: Bridging the Generation Gap."* Illinois Shooter, Summer 2009
- Lombardo, David A. "Club Profile: Howell Shooting Club, Inc."* Illinois Shooter, Summer 2009
- Lombardo, David A. "Reaching Out: A Momentous Point in Time."* Illinois Shooter, Fall 2009
- Lombardo, David A. "Club Profile: Aurora Sportsmen's Club."* Illinois Shooter, Fall 2009
- Lombardo, David A. "Reaching Out: I Have Seen the Enemy and He Is Us."* Illinois Shooter, Winter 2009
- Lombardo, David A. "Club Profile: Erienna Hunt Club."* Illinois Shooter, Winter 2009
- Lombardo, David A. "Club Profile: Rock Hollow Conservation Club."* Illinois Shooter, Spring 2010
- Lombardo, David A. "Home On The Range: ISRA.* Illinois Shooter, Summer 2010
- Lombardo, David A. "Reaching Out: Winter Youth Challenge."* Illinois Shooter, Fall 2010
- Lombardo, David A. "Reaching Out: Putting Back in the Pot."* Illinois Shooter, Spring 2011
- Lombardo, David A. "Taking Aim: Trigger Squeeze."* Outdoor Notebooks, December 2009
- Lombardo, David A. Taking Aim: Your First Gun!"* Outdoor Notebook, August 2009
- Lombardo, David A. Taking Aim: Hitting the Broad Side of a Barn.* Outdoor Notebook, September 2009

Lombardo, David A. *Taking Aim: The Weaver Stance.*” Outdoor Notebook, October 2009  
 Lombardo, David A. *Taking Aim: Recoil.*” Outdoor Notebook, January 2010  
 Lombardo, David A. *Taking Aim: Ricochets!*” Outdoor Notebook, February 2010  
 Lombardo, David A. *Smart Guns Prove People Aren’t.* Bearing Arms. 5/17/17.  
 Lombardo, David A. *A Gun Owner’s Wishes for the New Year.* Bearing Arms. 1/7/18.  
 Lombardo, David A. *It’s Time to Belly Up to the Bar of Accountability.* Bearing Arms. 1/7/18.  
 Lombardo, David A. *Bump Stocks Are Just Another Cut.* Bearing Arms. 2/7/18.  
 Lombardo, David A. *The Biggest Takeaway from Parkland School Shooting.* Bearing Arms. 3/3/18.  
 Lombardo, David A. *What did you do to prevent this from happening? A Safety Management System for Shooting Ranges.* Illinois Shooter, Spring 2019.  
 Lombardo, David A. *The 761<sup>st</sup> Gun Club of Illinois: Black Guns Matter.* Illinois Shooter, Spring 2019.  
 Lombardo, David A. *Do You Really Want to Have Your Day in Court?* Illinois Shooter, Winter 2020.  
 Lombardo, David A. *Second Amendment remains under attack in Illinois.*  
 McHenry County Response 10/05/21.  
 Lombardo, David A. *ISRA – Advocate or Activist?* Illinois Shooter, Fall 2021.  
 Lombardo, David A. *ISRA – Rittenhouse Was Hunted by Ex-Cons & False Narrative,* Winter 2021-22  
 Lombardo, David A. *ISRA – View from the Witness Stand: Unraveling Human Factors in Safety Management ,* Summer 2022  
 Lombardo, David A. *ISRA – View from the Witness Stand: Lack of Safety Management System Erodes Training Safety,* Fall 2022  
 Lombardo, David A. *ISRA –View from the Witness Stand: Whose Job Is It Anyway,* Winter 2022  
 Lombardo, David A. & Ed Ronkowski, JD–*What Illinois Residents Must Do to Stay Safe,* Winter 2022-23  
 Lombardo, David A. – *The Government Will Prevent a Civil War but You Are Still the Loser,* The Illinois Shooter Spring 2023.  
 Lombardo, David A. – *From The Witness Stand: Being Unprepared is Being Your Own Worst Enemy,* The Illinois Shooter Spring 2023.  
 Lombardo, David A. – *From the Witness Stand: Never Lose Control.* The Illinois Shooter Summer 2023.  
 Lombardo, David A. – *Opinion: New Mexico Governor Violates Constitution, Considers Gun Violence a Health Issue.* Illinois Review (9/13/23)  
 Lombardo, David A. – *From the Witness Stand: Safety Management Systems.* The Illinois Shooter Fall2023.  
 Lombardo, David A. – *Opinion: Pritzker’s Epic Failure to Intimidate Law-Abiding Gun Owners in Illinois:* The Illinois Review – 1/1/24.

### EMPLOYMENT RESUME

#### **09/12 - 9/23 On Target Media Group**

- Executive producer/co-host *On Target Radio* on Chicago’s #1 Conservative talk radio AM560 THE ANSWER – Sunday 9:00 to 10:00 PM
- Interview guests about issues that affect our listeners day-to-day lives
- Handle listener’s call-in questions and comments

#### **06/12 - Present SAFER USA Consulting Group**

- Consulting and expert testimony to the firearm industry
- Court Qualified Expert Witness:
  - in the design, maintenance, operation, use and human factors interface of firearms
  - shooting range and club (including IRS 501C non-profit) management
  - systemic safety management systems and standard operating procedures
  - training program design and implementation.



**10/09 - Present SAFER USA Outreach Fund, NFP; Shorewood, IL**

- Founder, President. An IRS 501C3 not for profit educational foundation/
- Provide firearm safety training and second amendment education to non-traditional shooters (women, youth, minorities and persons with disabilities).
- For 20 years provided the Clyde Howell NRA Youth Shooting Sports Camp that has trained over a thousand youth ages 10 to 16 over 18 years.

**10/06 - Present SAFER USA; Shorewood, IL**

- Founder, President & NRA Training Counselor/Instructor for firearm safety education.
- Offer over 35 firearm beginner, advanced and instructor courses
- Trained over 8,000 students
- Safety protocol consulting on law enforcement and military contract research projects

**09/00 – 09/16 Aviation International News; Midland Park, NJ**

- Aviation International News (monthly) - Senior Editor
  - Cover Asian market and write columns: Hot Section News and Hot Section Profile
  - Over 1100 articles published; traveled over 1.7 million airline miles covering stories
  - Six times a finalist for the International Aerospace Journalist of the Year.
- Write monthly industry blog
- Business Jet Traveler (bi-monthly)
  - Write column Safety Matters and Getaways column
- Convention News (on-location convention news)
  - Gather and write news-based articles
- AINmxReports (weekly online)
- AINtv
  - Producer/news anchor/reporter
  - Television coverage from the world's major air shows: Paris, Farnborough, Dubai, Singapore, Geneva, etc.

**05/93 – 09/00 Self-employed Journalist, Writer, Actor, and Speaker**

- **Writer**
  - Career total of over 1580 articles published in 30 industry periodical publications
  - Journalist – Illinois Shooter
  - Contributing editor - Aviation Maintenance Magazine, Rotor&Wing, and Flying magazine.
  - Developed numerous grant proposals, speech writing and promotional materials.
  - Past contributor: Bearing Arms.

**Author**

- Aircraft Systems – Understanding Your Airplane
- Aircraft Systems (Spanish version)
- Aircraft Systems (Chinese version)
- Advanced Aircraft Systems
- Aerospace Facts & Figures – 1999
- Aerospace Facts & Figures – 2000
- Vertical Flight Training: Alternative Training Systems.

**Actor**

- Numerous independent films, television productions, commercials, and industrial films
- 40+ years acting experience in community and regional theaters, and improv
- Ear prompter and teleprompter proficient

**Speaker**

- Over 6,000 hours of motivational speaking and seminars
- Established reputation for an informal, humorous style.
- Contract speaker for Amway - North American product spokesman
  - Over 120 seminars frequently to groups as large as 25,000

**01/95 – 06/95 "Five By Five" - WAUR AM 930**

- Host and Programming Director of live, aviation call-in radio program.
- Develop programming and conduct live interviews.
- Broadcast coverage area included most of the Greater Chicago Metro area.

**08/91 – 05/93 Lewis University; Romeoville, IL**

- Associate Dean of Aviation and Associate Professor, Division of Aviation.
- Responsible for all aviation budgets, strategic planning, resource management, 540+ students, 25+ faculty/staff members, FAR 141 and 147 schools.
- Overall responsibility for academic programming for 11 academic majors in Aviation Maintenance Management, Aviation Administration and Aviation Flight Management.
- Review and fine tune existing safety management system.
- Managed three academic buildings and coordinated \$2.25 M of new facility project planning.

**08/88 – 08/91 Bowling Green State Univ.; Bowling Green, OH**

- Assistant Professor, Aerotechnology Program, Dept of Tech Systems.
  - Teach primary and advanced lecture courses
  - Teach basic flight courses
- May 91 – Promoted to Director, Division of Aviation Studies
  - Administer \$400,000+ budget and 20+ employees
  - Coordinate all facets of Aerotechnology program
    - flight operations and safety, maintenance, and management
    - Develop Safety Management System
    - Curriculum, program, and facility development
    - Airport facility management
      - extensive space reclamation, development and reorganization.
    - Lay foundation for interdisciplinary human factor aviation research program.
  - Member graduate faculty
    - advisor to 120 undergraduate and graduate students
  - Advisor - Alpha Eta Rho professional aviation fraternity
    - increased active membership 400+%
    - Seek and write grant proposals
    - received \$30,000 research grant
  - Research interest: flight safety protocols and flight simulation transfer effectiveness ratio

**03/85 – 08/88 Frasca International; Champaign, IL**

- Director of Training
- International consultant on effective use of simulators to enhance flight safety programs for flight training, research, pilot selection, and training program development.
- Conduct domestic and offshore training for numerous international organizations.
- Editor and feature writer Simulation Newsletter.
- Set up and staff numerous trade shows
- Other responsibilities include:
  - internal human factors design consultant,

- marketing & advertising
- civilian and government proposal writing
- technical documentation.
- Produce and direct promotional video programming.
- Supervise 3 administrative assistants
- Work with numerous outside contractors, and high-ranking international government, corporate, airline and military personnel.

**09/82 – 03/85 Louisiana Tech University; Ruston, LA**

- Assistant Professor, Department of Professional Aviation
- taught courses in aerodynamics, multiengine theory, Boeing 727 flight engineer theory, instrument flight instructor, and airline transport pilot.
- Maintenance supervisor of 13 aircraft.
- Developed and taught career development and job search seminars (appx 10 taught).
- Part 141 Phase check pilot.
- Faculty advisor Alpha Eta Rho professional aviation fraternity - increased membership 500+%.
- Advisor two other organizations.
- Supervise flight dispatch operation and 13 employees.
- Conducted and published interdisciplinary research project in emergency aircraft lighting.

**09/81 – 06/82 GAITS Teaching Seminars; Milwaukee, WI**

- Part time teaching flight instructor refresher clinics.
- Specialized in education psychology, safety and prudent pilot operations, communications, and multiengine operations.

**09/81 – 09/00 Lombardo & Associates International aviation consultant**

- Flight, maintenance and simulation training program development and prudent pilot expert witness.
- Taught over 200 aviation safety seminars and flight instructor refresher clinics.
- Clients have included the Departments of Transportation for the states of Illinois, Louisiana, Ohio, Mississippi, Michigan, Wisconsin and Missouri; the Civil Air Patrol; EAA AirVenture '03 Oshkosh, The 99's; Federal Aviation Administration, NASA, numerous colleges, universities and aviation organizations, and domestic and international corporations.

**06/81 – 06/82 Airmanship, Inc. Rockford, IL**

- Director of program development for start-up company.
- Responsible for the design and development of all written, audio and visual aviation education programs and materials for professional pilot refresher flight and simulation training programs.
- Development of research/reference library
- Working supervision of in-house graphic arts, printing, photo lab, television studio and staff.

**03/81 – 05/81 U.S. Navy; Newport, RI - Basic Officer Course**

**02/80 – 03/81 FlightSafety International, St. Louis, MO**

- King Air 200 and Beech C-12 simulator instructor for U.S. and international flight crews.
- Design, develop and instruct classroom courses in FAA regulations, air traffic control procedures, and flight safety.
- Developed research/reference library.

**06/79 – 09/79 Mason Oil Company; Champaign, IL**

- Chief pilot & mechanic – Cessna 421 Golden Eagle

**05/77 – 02/80 Accelerated Ground Schools; Atlanta, GA (Part time)**

- Chief instructor - CFI Refresher clinic teaching team

- Responsible for conducting and organizing clinics.
- Teaching specialty: Flight safety, regulations, educational psychology, stress and physiology.
- 

**05/77 – 12/79 McCollum Aviation; Danville, IL (Part time)**

- Corporate aircraft broker.
- Duties: Aircraft ferrying worldwide, demonstrations, delivery and checkouts.

**05/66 – 05/69 U.S. Army Medical Corps**

- C-1 Med, 1st Infantry Division - Vietnam (1/67 – 1/68)
- Martin Army Hospital, Ft. Benning, GA (1/68 - 5/69)

**CONSULTING & EXPERT WITNESS EXPERIENCE**

**Cases (56); For the Plaintiff (23); For the Defendant (27); Consulting (23);  
Testified (10); Deposition (7); Reports (18); Video (2); Settled (11); Inspect on location (8)**

**FEDERAL - CIVIL**

**Wilson v. Cook County**

Plaintiff / Voluntary dismissal / Deposition

237 Ill.2d 593 (2010) upon remand Wilson v. Cook County 07 CH 4848 Challenge to Blair Holt Assault Weapon Ban Attorneys: James Vogts (Swanson, Martin & Bell) & Victor Quilici (general counsel IL State Rifle Association)

**Arie S. Friedman, M.D. & IL State Rifle Assoc v. Highland Park**

Plaintiff / Petition for Certiorari Denied / Produced video evidence

U.S. District Court for the Northern District of Illinois Eastern Division Challenge to Highland Park Assault Weapon Ban Attorneys: James Vogts (Swanson, Martin & Bell) Developed video

**United States v. Currie**

Defendant /Indictment Dismissed /Report

Gabrielle R. Sansonetti

Law Office of Gabrielle R. Sansonetti

**STATE - CIVIL**

**David C. Wilson v. Lydia Security Monitoring**

Defendant / Favorable Settlement / Report

\$8.0 million damages for alarm system failure

Christian Shippee (Touchstone Bernays) Dallas, TX

**Dr. Melina Abdullah, et al v. Jacquelyn Lacey, David Lacey, et al**

Plaintiff / Settled / Report / 8-Hr Deposition

Negligent use of firearm against BLM protestors

Carl Douglas; Douglas Hicks Law (Los Angeles)

**RANGE/GUN STORE OPERATIONS - CIVIL**

**Williams v. Texas Tactical**

Plaintiff / Active /

Bullets are hitting neighbor's property

Attorney Jackson Davis

Streck Davis Law (Texas)

**Jerome Tester & Julie Noe v. John & Heather Courtney and Black Diamond Guns & Gear**

Plaintiff / Active / Range inspection / Report

Range depositing bullets on neighbor's property

Attorney Ryan W. Goddard

Kizer & Black Attorneys, PLLC (TN)

**Paul Canavan v. Adam Costa**

Plaintiff / Active /

Costa private range endangering plaintiff's and other's property

Attorney Robert Singer, Law Offices of Robert Singer, Hamden, CT

**Keri Green v. Marcus Capobianco, GV Range, dba Green Valley Range**

Plaintiff / Active / Report & inspect range

Plaintiff crossed behind Range Safety Officer as he was stepping out of an indoor range cubicle

Attorney Charles Simmons, Esq, Wilson Elser, Las Vegas, NV

**Andrew Caswell v. Cousins Paintball New Jersey**

Plaintiff / Active / 7 ½-hr Deposition / Report

12 yr old at paintball birthday party shoots self without supervision

Attorney Gabriella Russo, Esq; Wilentz, Goldman & Spitzer, P.A. Red Bank, NJ

**Jerome & Julie Noe v. Josh & Heather Courtney and Black Diamond Guns & Gear**

Plaintiff / awaiting trial / Inspect range

Uncontained bullets from neighboring shooting range landing on plaintiff's property

Attorney Ryan Goddard, Kizer & Black Attorneys PLLC; Maryville, TN

**Timothy D. Stinnett v. S.E. Davis Company, Inc**

Plaintiff / Settled / Deposition & Report / Settled for \$1.1M after I testified

Negligent discharge of a firearm in a gun store resulting in non-life-threatening injury.

Attorney Steve Romines, Romines, Weis & Young, P.S.C.; Louisville, KY

**Spring Valley Range – Kleingers Group vs. TRS Arbitration**

Plaintiff / Settled / Report

Range development contract violation

David Patterson, Weston Hurd LLP

**Grundy County, Illinois**

Consulting / Ordinance published

County outdoor shooting range ordinance – Heidi Miller, Land Use Director

**Kendall County, Illinois**

Consulting / Ordinance published

County outdoor shooting range ordinance – Matt Asselmeier, Senior Planner

**City of Harvey v. John Howard & USI Outdoor Range**

Defendant / closed the range / Testified & Inspect range

Administrative Hearing Administrative closure of the shooting range Attorney: Stephanie A.

Wolfson (Goldberg Law Group) City of Harvey

**McHenry County Conservation District v. Dennis Brinkman**

Plaintiff / Range closed / Testified

Uncontained rounds - Shooting range in proximity to park district property

Scott A. Puma, partner, Ancel Glink, Vernon Hills, IL

**Thomas Landrum v. C C Plus, Inc**

Plaintiff / Awaiting trial / Report

Civil case – loss of hearing over negligent discharge of a firearm. Attorney: Joshua Alexander; The

Alexander Firm.; Houston, TX

**Christa Kenyon v. TNT Guns & Range**

Plaintiff / Active / Report & inspect range

Negligent discharge resulting in non-life-threatening injuries. Attorney Adam Grundvig Kesler/Rust Law Offices; Salt Lake City, UT

**Diaz-Austin v. Townsend, Concealed Carry & Adv Tact Firearm Educ.**

Plaintiff / Active / Report / Deposition

Personal injury damages in training

Attorney Sara E Woods; Mynatt, Martinez, Springer P.C. Las Cruces, NM

**TRAINING OPERATIONS - CIVIL**

**Hervas v. Shooter's Gallery**

Plaintiff / Active / inspect range /

Personal injury

Attorney Michael Lee; Gary Holt & Associates (Little Rock, AR)

**Schoenauer v. Oaktree Gun Club**

Plaintiff / Settled / Deposition

Negligent discharge during stunt man tryouts resulting in serious injuries

Attorney James R. Traut; Traut Firm; Santa Ana, CA

**McMahon v. Rockwell Tactical Group LLC**

Defendant / Settled / Consulting

Negligent discharge in training resulting in life-threatening injuries.

Attorney Derek Mayhugh; Chartwell Law; Philadelphia

**Unterberger v. Bass Pro Shops**

Plaintiff / Settled / Consulting

Failure of duty of care during rifle bore scoping resulting in employee injury

Attorney: Dillon Vaughn; Slack, Davis, Sanger LLP; Austin, TX

**Donna K. Baker v. K Tactical**

Defendant / Nolle prosequi / Consulting & Inspect facility

Wrongful death, Survival and Punitive Damages Nationwide Insurance Company Columbus, OH

**FIREARM NEGLIGENT DISCHARGE - CIVIL**

**Jimmy Buisson v. CRGC Enterprises; FL**

Plaintiff / Active /

Jimmy Buisson

Negligent discharge resulting in loss of finger

Jennifer Lipinski, Esq; Lipinski Law; Jupiter, FL

**Paul Cox v. Fraternal Order of Police #113**

Plaintiff / Active /

Life threatening wounds resulting from negligent discharge on a range

Sam Ranard, Attorney; Farah & Farah; St. Augustine, FL

**Rylan Wilder v. Maurice Murphy, James Armstrong & City of Des Plaines**

Plaintiff / Settled \$1.9 million /Report & inspect facility

Life threatening wounds resulting from LEO accidental shooting

Michael Sorich, Attorney; Cavanagh Law Group; Chicago, IL

**Sarmiento & Garza v. Capital Couriers, First Houston Delivery & Israel Vasquez Ramirez**

Defendant / Active / Report

Negligent discharge resulting in serious personal injury

Attorney: Andrew Myint, esq. Ramey, Chadler, Quinn & Zito, P.C.; Houston, TX

**Ulbing v. Rick**

Plaintiff / Settled / Consulting & inspect facility

Reckless discharge of a weapon resulting in non-life-threatening injury.

Attorney: Brad Krueger; Nash, Spindler, Grimstad & McCracken, LLP; Manitowoc, WI

**Richard N. Bell v. Diane Brown Bell**

Plaintiff / Mediation & Settled / Consulting

Negligent discharge of an air rifle. Attorney Ryan Hamilton, Hamilton Law, Las Vegas, NV

**Denton I-35 Milam, LLC v. Denton County, Texas**

Plaintiff / Settled / Consulting

(Civil Case #17-4750-16) Uncontained rounds on neighbor's property Attorney

Chris Smith, Smith Jolin LLP; Austin, TX - Consulting - pending in 16<sup>th</sup> Judicial District Court of Denton County, Texas

**FIREARMS/USE OF FORCE - CRIMINAL**

**Alaska v. Fair**

Defendant / Active /

Manslaughter

Lacey Jane Brewster; Alaska Public Defender Agency (AK)

**Illinois v. Christopher Mota**

Defendant / Active /

1<sup>st</sup> Degree Murder

Robert Ritacca; Law Office of Robert P. Riacca, Esq (Chicago)

**Dennis Murphy, Nickolas Martin, plaintiff v. Gerald Archibeque, defendant**

Defendant / Active /

Wrongful Death

William Anderson, Esq; O'Brien & Padilla P.C. (New Mexico)

**Illinois v. Lemont A Brooks**

Defendant / Manslaughter

1<sup>st</sup> degree murder

David McDermott Law Group; Homewood, IL

**Illinois v. Andre Strong**

Defendant / Report & Testified /

18 CR 1746701 Aggravated discharge of a firearm

Dennis Doherty, Attorney; Chicago

**Iowa v. LizMarie Gisselle Quiles,**

Defendant / Child Endangerment dropped / Consulting

Criminal Case #AGCR363864 – Assault & Child Endangerment

Johnathan Sears, Clark & Sears Law, PLLC, Des Moines, IA



**Illinois v. Juan Hernandez**

Defendant / Active /

Murder

Gregory Swygert – Northwestern Pritzker School of Law

**Indiana v. Jaylen Ryle**

Defendant / Plea / Report

Murder

Attorney Kathie Perry – Baldwin Perry & Karnish, P.C.

**Indiana v. Darius Birk**

Defendant / Guilty / Deposition / Testified

Ag Battery, Pointing Firearm; Carrying a Firearm Without a License, and Attempted Murder

Attorney Carrie Miles, Baldwin Perry & Kamish, P.C.

**Illinois v. Jeremy Lydon**

Defendant / Nolle prosequi / Testified

State of Illinois County of Cook Case No. 13CR-13331 Illegal possession of automatic weapon & silencer. Attorney Daniel E. Radakovich, Chicago, IL.

**Illinois v. Jeffrey Keller**

Defendant / 1<sup>st</sup> degree murder conviction upheld on appeal / Testified

For the defendant 18th Judicial Circuit Court 1st Degree Murder Attorney: Paul Moreschi, Cetina & Moreschi PC, Oakbrook Terrace, IL

**Illinois v. Donald J. Sullivan**

Defendant / Nolle prosequi / Testified

DuPage County Case No. 11 CF 1695 (2012) Attorney: Walter P. Maksym, Jr., Walter P. Maksym & Associates, Chicago, IL. Unlawful Use of a Weapon & Aggravated Assault

**Illinois v. Scott R. Langford**

Defendant / Guilty Class X felony / Testified, Report & produced video evidence

17-CF-359 Unlawful possession of a weapon by a felon; Attorney Monroe McWard; Springfield, IL. Reckless discharge of a weapon; and Armed habitual criminal.

**Illinois v. George Kleopa**

Defendant / 1<sup>st</sup> Degree Murder reduced to involuntary manslaughter of a family member / Report

For the defendant Circuit Court of Cook County 6th District 12CR14792 1st Degree Murder

Attorney: Theodore Gailan, Law Offices of Theodore Gailan, Addison, IL Consulting

**Illinois v. Joseph Connolly**

Defendant Nolle prosequi / Consulting

No. 2019CR36051 Reckless Discharge of a Weapon. Attorney Charles W. Dobra, Attorney & Counselor at Law, Roselle, IL.

**Illinois v. Blaique Morgan**

Defendant / Nolle prosequi / Consulting

Unlawful possession of a weapon; reckless discharge of a weapon. Pro Se

**Varron Wilson v. State of Illinois**

First degree murder – contesting firearm and cartridge compatibility / consulting  
Defendant / Active / Consulting  
Menard Correctional Center #B57716; Menard, IL - Pro Se

**People v. David Chesser, 2019-CF-250**

Defendant / Settled – 2<sup>nd</sup> Degree) / Test Fired Weapon & Report  
1<sup>st</sup> degree murder, Ag Discharge of Firearm; Attempted Murder; and Aggravated Domestic Battery  
Attorney: Dan Fultz, Brown, Hay & Stephens; Springfield, IL

**Illinois v. Christopher Mota**

Defendant / Active / Consulting  
1<sup>st</sup> Degree Murder  
Attorney: Robert Ritacca; Robert Ritacca Attorney at Law; Waukegan, IL

**Illinois v. Justin Barber**

Defendant / Conviction upheld; appeal denied / Consulting  
First degree murder  
Attorney: Dennis Doherty, Chicago, IL

**Illinois v. Deven Barger**

Defendant / Active / Consulting  
First degree murder  
Attorney: Nathan Frisch; Beavers, Calvert, Brotherton & Frisch; Taylorville, IL

**Florida v. McKinley**

Appellant / Active / Consulting  
2018-CF-000642-AMB First degree murder  
Attorney: Andrew Williams, The Williams Law Group; Miami, FL

**ADMINISTRATIVE HEARING**

**Village of Melrose Park v. Officer John Scatchell**

Plaintiff / Respondent terminated / Testified  
Testified Administrative Hearing Official Misconduct Attorney: Jeffrey S. Fowler

**GENERAL CONSULTING**

**Just Cause Solutions LLC**

Consulting  
Louisiana-based start-up ammunition manufacturer. Consulting on marketing with consideration of human factors issues for warning label text & package position.

*Deuteronomy 1:17 Do not show partiality in judging; hear both small and great alike.*

(240305)