

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

CALEB BARNETT, et al., Plaintiffs,	)	Case No. 3:23-cv-209-SPM
	)	**designated Lead Case
	)	
v.	)	
	)	
KWAME RAOUL, et al., Defendants,	)	
	)	
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DANE HARREL, et al., Plaintiffs,	)	Case No. 3:23-cv-141-SPM
	)	
	)	
v.	)	
	)	
KWAME RAOUL, et al., Defendants,	)	
	)	
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JEREMY W. LANGLEY, et al., Plaintiffs,	)	Case No. 3:23-cv-192-SPM
	)	
	)	
v.	)	
	)	
BRENDAN KELLY, et al., Defendants,	)	
	)	
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FEDERAL FIREARMS LICENSEES OF ILLINOIS, et al., Plaintiffs,	)	Case No. 3:23-cv-215-SPM
	)	
	)	
v.	)	
	)	
JAY ROBERT “J.B.” PRITZKER, et al., Defendants.	)	
	)	
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**DECLARATION OF STEVEN R. WATT**

I, Steven R. Watt, 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 1**, including any clarifications provided during my subsequent deposition, 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 and elaborated on in my sworn deposition testimony provided in the above-captioned cases. My testimony would be consistent with all of the statements in the report and deposition (and any errata sheet), 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/ Steven R. Watt* \_\_\_\_\_  
Steven R. Watt  
Declarant

# **EXHIBIT 1**

**EXPERT REPORT OF STEVEN R. WATT**

**SUBJECT MATTER**

Assessment of the use and suitability of firearms restricted under the Protect Illinois Communities Act for lawful purposes; particularly self-defense, training, and competition.

**BACKGROUND AND QUALIFICATIONS**

**CURRICULUM VITAE**

Steven R. Watt  
3465 N. Blue Sage Rd.,  
Morgan, Utah 84050  
801-940-6152  
randy@srwsplops.com

**PERSONAL INFORMATION**

Date of Birth: 12/21/57  
Place of Birth: Montreal, Quebec, Canada  
Citizenship: USA  
Sex: Male  
Marital Status: Married (40 years)

**CURRENT OCCUPATION**

Occupation: Consultant/President/Owner  
Company: SRW Special Operations Strategic and Tactical Training and Services,  
Incorporated (SRW, INC.)  
Address: 3465 N. Blue Sage Rd.  
Morgan, UT 84050  
801-876-3867  
Incorporated: 2008

**FORMER OCCUPATIONS**

Occupation: Chief of Police  
Company: Ogden Police Department  
Address: 2186 Lincoln Ave.  
Ogden, UT 84401  
801-629-8227  
Hire Date: 12/31/16  
Retirement Date: 01/15/21  
  
Occupation: Colonel, Infantry and Special Forces Branches  
Employer: Utah Army National Guard  
Address: PO Box 1776  
Draper, UT 84020-1776  
Enlistment Date: 11/30/81

Retirement Date: 09/30/15  
Occupation: Assistant Chief of Police  
Employer: Ogden City Police Department  
Address: 2186 Lincoln Avenue  
Ogden, Utah, 84401  
801-629-8208  
Hire Date: 08/27/79  
Retirement Date: 10/15/11

EDUCATION

Degree: Master of Strategic Studies  
University/College: U.S. Army War College, Resident, (USAWC)  
Location: Carlisle, PA  
Graduated: 2010

Degree: Master of Business Administration  
Location: Ogden, UT  
University/College: University of Phoenix  
Year: 1990

Degree: Bachelor of Police Science  
Location: Ogden, UT  
University/College: Weber State College  
Year: 1980

Degree: Associate of Law Enforcement  
University College: Lethbridge Community College  
Location: Lethbridge, AB, Canada  
Year: 1978

POLICE EDUCATION

12/12/1997	FBI National Academy	Quantico, VA
04/12/1990	Budgeting for Police Administration	Utah P.O.S.T., Salt Lake City, UT
12/15/89	Mid-Management Course	Utah P.O.S.T., Salt Lake City, UT
11/01/85	First Line Supervisor	Utah P.O.S.T., Salt Lake City, UT
11/04/83	Instructor Development	Utah P.O.S.T., Salt Lake City, UT

POLICE TRAINING AND CERTIFICATIONS

LEADERSHIP

03/13/08 Planning/Response to Terrorism/WMD, Department of Homeland Security  
02/28/06 Intro to ICS, Emergency Management Institute (FEMA)  
03/31/05 National IMS, Emergency Management Institute (FEMA)  
12/02/03 Risk Management, Utah Valley State College  
02/21/97 Leadership Development, Countermeasures Tactical Institute  
03/14/95 Conference on Workplace Violence, International Association of Chiefs of Police

09/29/93 Critical Incident Management, International Association of Chiefs of Police  
03/18/93 ICS, Train-the-Trainer, Emergency Management Institute

S.W.A.T.

08/13/11 Simunitions Safety Certification Course, Scenario Instructor Course, Gunsite  
11/12/98 Tactical Explosive Entry, Salt Lake County Sheriff's Office  
09/04/98 Response to CBRNE Terrorism, International Association of Chiefs of Police  
03/07/97 Less Lethal Weapons Instructor, International Association of Chiefs of Police  
06/02/95 Tactical Leadership Development Course, Countermeasures Tactical Institute  
02/11/94 Ultra S.W.A.T., International Association of Chiefs of Police  
09/17/93 Aerosol Projector Instructor, Defense Technology Training Academy  
06/28/93 L.E. Chemical Munitions, AAI Manufacturing Assembly Inc.  
04/01/93 S.W.A.T. Supervisors Tactics and Management, International Association of  
Chiefs of Police  
05/04/90 Special Operations Crisis Management, Mountain States Tactical Officer's  
Association  
05/26/89 Tactical Hostage Rescue, Utah P.O.S.T.  
01/28/88 Officer Survival, Utah Peace Officers Association  
02/06/84 Tactical Police Methods, U.S. Indian Police Academy

FIREARMS

03/01/24 USCCA Training Coordinator Certification Course, Prescott, AZ (40 hrs.)  
12/16/23 Tactical Pistol 3, Trident Concepts, Phoenix, AZ (16 hrs.)  
08/30/23 Tactical Carry, Level 2, Trident Concepts, Ogden, UT (16 hrs.)  
04/30/23 Cognitive Firearms Conclave, Cougar Mountain Training, Martin, GA (20 hrs.)  
12/04/22 Tactical Carry, Level 1, Trident Concepts, Phoenix, AZ (16 hrs.)  
09/30/22 Legacy Course, Pistol/Combatives, Handgun Combatives Training, Inc. (46 hrs.)  
04/11/21 IWI, Tavor Carbine, Level 1 Course, Paulden, AZ  
01/24/21 Kinetic Pistol Combat Course, Handgun Combatives Institute, Peoria, AZ  
10/02/20 Gunsite Rangemaster Certification, Gunsite  
08/23/20 Rob Leatham Firearms Training Seminar, 3-days  
07/24/20 LASD, 16-hr CAPOST, Red Dot Pistol Transition course, Ogden, UT  
08/16/16 Gunsite Firearms Instructor Recertification, Gunsite  
08/02/11 Gunsite Firearms Instructor Recertification, Gunsite  
03/10/06 Advanced Combat Shotgun (460), Expert Rating, Gunsite Academy  
04/22/05 Advanced Defensive Pistol (499), Expert Rating, Gunsite Academy  
08/20/04 Basic Defensive Pistol (250), Expert Rating, Gunsite Academy  
04/26/01 Tactical Rifle Carbine, AIS/PRISIM  
06/07/96 Firearms Instructor Course and Certificate, Utah P.O.S.T.  
02/09/86 Firearms Instructor Course, Countermeasures Tactical Institute  
04/07/94 MP-5 Certification Course, International Association of Chiefs of Police  
10/21/92 Handgun/Submachine Gun Course, Idaho Nuclear Engineering Laboratory

INVESTIGATIONS

12/12/97 Clinical Forensic Psychology, Federal Bureau of Investigation  
09/16/96 Clandestine Drug Lab First Responder, Utah P.O.S.T.

06/12/91 Supervision of Drug Investigations, U.S. DOJ, DEA  
06/15/91 Narcotics Investigations, Utah P.O.S.T., Utah Narcotics Officers Association  
12/14/90 Criminal Case Analysis and Charting, Utah P.O.S.T.\  
10/25/90 Narcotics Unit Supervisors Course, W.H. Harris and Associates  
09/21/90 Narcotics Investigator Basic Course, U.S. DOJ, DEA  
04/03/87 Criminal Intelligence Processes, Las Vegas Metro Police Department  
03/27/87 White Supremacist Organizations, Utah P.O.S.T.  
05/23/86 Advanced Homicide Investigations, Utah P.O.S.T.

#### ARREST CONTROL AND DEFENSIVE TACTICS

10/09/06 Instinctive Retention and Disarming Course, Modern Warrior Institute  
08/09/06 Tactical Ground Fighting Instructors Course, Modern Warrior Institute  
02/17/05 Taser X26 Certification, Taser International  
06/28/94 Arrest Control Instructor Certification, Utah P.O.S.T.  
11/17/89 Arrest Control Instructor Course, Utah P.O.S.T.  
11/17/89 Arrest Control Instructor Certificate, Utah P.O.S.T.  
01/13/86 Use of Force Instructor Development Certificate, Utah P.O.S.T.  
09/21/85 Baton Instructor Course, Koga Institute  
06/07/85 Defensive Tactics Instructor Course, Koga Institute  
01/18/84 Arrest Control/Patrol Tactics/Crisis Intervention Instructor, Utah P.O.S.T.

#### POLICE AWARDS

01/15/21 Superior Service Medal, Ogden Police Department  
11/20/20 Outstanding Contribution to PSN Award, DOJ, the Honorable William Barr  
05/21/19 Utah Police Chief of the Year, Large Agency, UCOPA  
09/16/00 John A. Kolman Award of Excellence, National Tactical Officers Association  
11/20/00 Medal of Valor, Ogden Police Department, for S.W.A.T. Operations  
07/24/94 Medal of Merit, Ogden Police Department, for SWAT Operation  
05/03/93 Northern Utah L.E. Officer of the Year, Utah Department of Corrections  
11/25/91 Medal of Valor, Ogden Police Department, for S.W.A.T. Operation  
11/25/91 Distinguished Service Award, Ogden Police Department  
Excellent Work Awards – 14  
Internal Letters of Appreciation/Commendation - 22  
External Letters of Appreciation/Commendation - 9

#### MILITARY EDUCATION

06/12/10 U.S. Army War College (USAWC), Carlisle, PA  
09/18/05 Command and General Staff Officers Course (CGSC), Ft. Leavenworth, KS  
08/19/00 Combined Arms Service and Support School (CAS3), Gowan Field, ID  
09/23/94 Infantry Officer Advanced Course, Ft. Benning (IOAC), GA  
04/26/91 Special Forces Officer Qualification Course (SFQC), Ft. Bragg, NC  
02/14/91 Infantry Officer Basic Course, Ft. Benning (IOBC), GA  
08/26/89 Officer Candidate School (OCS), Camp W.G. Williams, UT  
04/11/86 Primary Leadership Development Course (PLDC), Camp W.G. Williams, UT  
09/17/84 Special Forces Weapons Sergeant Qualification Course (SFQC), Ft. Bragg, NC

MILITARY TRAINING AND CERTIFICATIONS

04/30/10 Combatives, Level II  
12/15/09 Combatives, Level I  
05/13/06 Combat Lifesaver Course, Camp W.G. Williams, UT  
05/05/06 Instructor, Special Forces Basic Combat Course – Support, Camp W.G. Williams, UT  
07/15/05 Instructor, Special Forces Advanced Urban Combat Course, Camp W.G. Williams, UT  
09/08/95 Military Free Fall Parachutist Course, Yuma Proving Grounds, AZ  
11/07/93 Fast Rope and Rappelling Master Course, Tulsa, OK  
03/20/92 Jumpmaster Course, Ft. Benning, GA  
06/01/82 Basic Airborne Course, Ft. Benning, GA  
05/12/82 Chemical Operations Specialist Course, Ft. McClellan, AL  
03/14/82 U.S. Army Basic Training, Ft. McClellan, AL

MILITARY COMBAT SERVICE

12/05/01 – 12/04/02 Operation Enduring Freedom, Afghanistan  
07/15/06 – 06/27/07 Operation Iraqi Freedom, Iraq  
06/24/10 – 06/14/11 Operation Iraqi Freedom/Operation New Dawn, Iraq

MILITARY AWARDS

Bronze Star w/V Device, Bronze Star Medal (3), Meritorious Service Medal (3), Army Commendation Medal (7), Army Achievement Medal (4), Army Reserve Component Achievement Medal (3), National Defense Service Medal w/Bronze Star, Iraq Campaign Medal w/3 Stars, Afghanistan Campaign Medal w/2 Stars, Global War on Terrorism Expeditionary Medal, Global War on Terrorism Service Medal, Armed Forces Reserve Medal w/M and Hourglass Devices (3), NCO Professional Development Ribbon, Army Service Ribbon, Army Overseas Service Ribbon (3), Army Reserve Component Overseas Training Ribbon (4), Utah National Guard Recruiting Ribbon, Utah National Guard Commendation Ribbon, Utah National Guard Service Ribbon, Utah National Guard Basic Training Ribbon, Combat Infantryman’s Badge, Joint Meritorious Unit Award, Military Free Fall Parachutist Badge, Master Parachutist Badge, Senior Parachutist Badge, Parachutist Badge, Canadian Parachutist Badge, Australian SAS Parachutist Badge, Royal Thailand Air Force HALO Badge, Royal Thailand Special Forces Parachutist Badge, Royal Thailand Marine Parachutist Badge, Outstanding Graduate – Officer Candidate School, SGM Mize Award/Academic Honor Graduate/Outstanding Leadership Award – Primary Leadership Development Course (PLDC), Honor Graduate (AIT), Honor Graduate (Basic Training)

ADDITIONAL PERSONAL CERTIFICATIONS

06/12/14 Concealed Firearm Instructor Certification, Utah Department of Public Safety  
07/21/11 Concealed Firearm Instructor Certification, Utah Department of Public Safety  
02/25/08 Concealed Firearm Instructor Certification, Utah Department of Public Safety  
06/26/87 Rescue Diver, Professional Association of Diving Instructors (PADI)  
06/21/87 Night Diver, Professional Association of Diving Instructors (PADI)  
06/15/87 Search and Recovery Diver, Professional Association of Diving Instructors (PADI)



- 10/04/82 International Open Water Diver, Professional Association of Diving Instructors (PADI)
- 12/21/81 Black Belt, Wun Hop Kuen Do, Kajukenbo Association

BOARDS OF DIRECTORS, ADVISORY POSITIONS

- 4/2/22 – Present Member, Executive Board, Crossroads of the West Council, BSA
- 3/20/18 – 11/01/20 Member, Executive Board, Trapper Trails Council, BSA
- 6/20/17 – 12/31/20 Member, Advisory Board, Utah Chapter AUSA
- 1/20/17 – 01/15/21 Member, Board of Directors, Cottages of Hope
- 1/20/17 – 01/15/21 Member, Board of Directors, Juvenile Justice Center
- 8/21/13 – 12/31/21 Chairman of the Board of Directors, Hand In Hand Outdoors, LLC
- 1997 – 2010 NTOA Tactical Command Section Chair
- 2003 – 2009 Salvation Army Advisory Board
- 2003 – 2009 National Center for Shaken Baby Syndrome
- 1999 – 2003 Swanson Family Foundation
- 1999 – 2001 Co-Chair, Tactical Response Sub-Committee, Utah Olympics Committee

PROFESSIONAL AFFILIATIONS AND MEMBERSHIPS (CURRENT AND PAST)

POLICE

FBI National Academy Associates; Technical Support Working Group (TSWG), Office of Combating Terrorism, Office of Secretary of Defense (OSD); International Association of Chiefs of Police (IACP); National Tactical Officers Association (NTOA); International Law Enforcement Educators and Trainers Association (ILEETA); Illinois Tactical Officers Association (ITOA); California Tactical Officers Association (CATO); Texas Tactical Police Officers Association (TTPOA); Mountain States Tactical Officer Association (MSTOA); Utah SWAT Association

MILITARY

Special Forces Association (SFA); American Legion; Veterans of Foreign Wars (VFW); Special Operations Warrior Foundation

ADJUNCT FACULTY POSITIONS (CURRENT AND PAST)

- International Academy of Public Safety: Commissioner
- United States Army War College: Eisenhower Program member
- International Association of Chiefs of Police: SWAT, Firearms, Leadership, Terrorism, Workplace Violence
- National Tactical Officers Association: SWAT, Firearms, Leadership, Terrorism
- Weber State University: Criminal Justice/Law Enforcement
- Utah P.O.S.T.: SWAT, Firearms, Arrest Control, Patrol Tactics

COPYRIGHTS AND TRADEMARKS

- Corporate Campaign Model, SRW, Inc.
- One Warrior’s Creed Logo
- One Warrior’s Creed
- Ogden/Metro SWAT Logo

Ogden/Metro SWAT Standing Operating Procedures (SOP)

PUBLISHED WORKS

“Identifying and Combatting Organizational Leadership Toxicity,” The Journal of California Law Enforcement, Volume 49, No. 2, 2015, co-authored.

“On Leadership”, Quarterly Column, Tactical Edge Magazine, NTOA, 32 issues, (2006-present)

“Can the U.S. Defeat Al Qaeda?”, USAWC Strategy Research Project, 2010

NTOA SWAT Standards, Committee Chairman and contributor, 2009

BIO

Steven R. Watt (Randy) is the President of SRW, Inc., (www.srwinc.us, www.warriorcreed.us), a training and consulting business he started in 2008. SRW, Inc. provides Leadership, Business Development, Safety/Security, and Special Operations training and services to select client organizations. Randy holds a Master of Strategic Studies Degree from the U.S. Army War College, a MBA from the University of Phoenix, a Bachelor of Police Science Degree from Weber State University, and is a graduate of Session 191 of the F.B.I. National Academy. He is an expert in use of force and has provided expert opinions and testimony in criminal and civil cases. Randy’s expert experience regarding use of force is attached as **Exhibit 1**.

Randy retired as Chief of Police of the Ogden, Utah, Police Department on January 15<sup>th</sup>, 2021, after serving for 4 years as Chief. Randy had initially retired from the Ogden Police Department in October of 2011, while serving as an Assistant Chief of Police, after having completed thirty-two years of service in a multitude of assignments and at all levels of supervision and leadership. In January of 2017, Randy was asked by City Officials to return as Chief. Chief Watt is a recipient of various medals and commendations, including the department’s Medal of Valor (twice awarded). A long-time member of the Ogden/Metro S.W.A.T. Team, Chief Watt has extensive experience in tactical operations, ranging from high-risk warrant service to hostage rescues.

Chief Watt is a nationally recognized expert in the field of law enforcement special operations and counter-terrorism. He has been involved with projects supporting the Department of Homeland Security (DHS) and the National Institute of Justice (NIJ). He is an expert witness on Law Enforcement use of force and counter-terrorism. He is a regular contributor and speaker on Active Shooter Response for a variety of clients. He is a lead instructor for the National Tactical Officers Association (N.T.O.A.) in a variety of S.W.A.T. Leadership and Terrorism courses, and is a regular presenter at the N.T.O.A. Conference, as well as at various state S.W.A.T. Association conferences and training events. He is the past author of the “On Leadership” column for the N.T.O.A.’s Tactical Edge magazine. Prior to the 2002 Winter Olympics in Salt Lake City, Utah, then-Lieutenant Watt, was co-chair of the Tactical Response Sub-Committee and spent three years studying terrorism, writing the tactical response plan for protection of the Olympic Games, and conducting security assessments for Olympic venues. Chief Watt has taught hostage rescue tactics and techniques to foreign military and police units and is a

consultant to myriad local, state and federal tactical units. He is a Commissioner for the International Academy of Public Safety and is an instructor at Gunsite Academy in Paulden, AZ.

Chief Watt has extensive military experience and retired in September, 2015, as a Colonel in the Utah Army National Guard. His last assignment was to the Joint Forces HQ, UTNG. From June, 2011, to December, 2013, he was the Commander of the 19th Special Forces Group (Airborne), commanding 2200 Special Forces soldiers located across 9 states. A Special Forces and Infantry branched officer with thirty-four years of active duty and reserve Special Forces experience, he is a graduate of numerous Special Operations courses and schools. Randy is a Master Parachutist and Military Free-Fall Parachutist. Leadership schools include the Infantry Officer's Basic and Advanced Courses, Special Forces Qualification Course (Enlisted and Officer) Combined Arms Service and Support School, Command and General Staff Officer's Course, and the resident U.S. Army War College. COL Watt commanded at all levels of Special Forces units, ODA, Company, Battalion and Group.

Colonel Watt's combat service includes year-long tours of Afghanistan, 2001-2002, Iraq, 2006-2007, and Iraq again in 2010 through 2011. All assignments were leadership and key staff positions of special operations units. As a result of his service, he received the Bronze Star Medal with "V" device, three Bronze Star Medals for meritorious service, the Combat Infantryman's Badge, the G.W.O.T. Expeditionary and Service Medals, the Afghanistan Campaign Medal with two stars, the Iraq Campaign Medal with three stars, and the Joint Meritorious Unit Award. He was featured in the March, 2003, ABC television special Profiles From the Front Lines, and the August, 2003, issue of Men's Health magazine. He is the author of "One Warrior's Creed," written during the closing days of his 06-07 Iraq tour.

Colonel Watt is an expert in Terrorism for the U.S. Department of Justice, Office of Military Tribunals, providing expert testimony for court purposes as well as for investigation of terrorist tactics, techniques and procedures (TTPs). He has testified at trials and hearings in Guantanamo Bay, Cuba, on behalf of the United States Government.

## **OPINIONS AND ANALYSIS**

1. I am currently President/CEO of SRW, Inc./Warrior Creed ([www.srwinc.us](http://www.srwinc.us), [www.warriorcreed.us](http://www.warriorcreed.us)), which offers consulting, as well as tactical firearm training courses in various locations in the United States and foreign locations as contracted. I have held that position and have been conducting such training since 2008. SRW, Inc./Warrior Creed's clients include law enforcement and military clients but are mostly civilians. SRW, Inc./Warrior Creed trains approximately 5 times the number of civilian students as law enforcement or military. I am also a Rangemaster with Gunsite Academy in Paulden, AZ, the longest operating defensive firearms training institution in the world, having been in continuous operation since 1976. Gunsite Academy serves mostly civilian customers, with military and law enforcement personnel often attending as private citizens, though it does provide contracted training specifically for military and law enforcement clients. I personally teach 6-12 courses per year in handgun, carbine, shotgun, and tactics related courses, each course being one week (5-days) in length. I also instruct for Israeli Weapons Systems (IWI), particularly in their carbine courses. IWI is a tactical firearm manufacturer that sells a variety of tactical and self-defense related firearms,

many of which have one or more of the features discussed below. IWI has a training division which teaches purchasers how to properly train with and utilize the firearms. For clarity and to relieve confusion, where SRW, Inc./Warrior Creed training is referenced below, it includes the additional training organizations as well.

2. SRW, Inc./Warrior Creed offers training courses to the public for the defensive use of pistols, carbines, and shotguns, as well as in the tactical application of these firearms in defensive situations, such as countering home invasions, carjackings, armed robberies, aggravated rape, aggravated assault, and other like violent crimes.

3. I personally developed SRW, Inc./Warrior Creed's course curriculum based on my extensive experience as a law enforcement officer and military special operations soldier, which informed my understanding of what civilians in our communities need to defend themselves against violent predatory criminals. My experience gave me a profound understanding of the need for civilians to be able to effectively defend themselves immediately, as law enforcement customarily responds to violent circumstances after the initiation of violence. That unfortunate reality requires the victims of said violence to defend themselves until the arrival of law enforcement. It is also my experience that in a high majority of cases, the violence is very short-lived and usually over by the time law enforcement arrives. Absent self-defense, the victims of violent predatory criminals are subjected to whatever levels of violence are directed against them. This background and experience has shaped and influenced the development of my defensive firearm curriculum for members of the general public.

4. SRW, Inc./Warrior Creed utilizes a cadre of 8-12 trainers to teach its 30-40 defensive firearm courses per year that are offered to the general public. SRW, Inc./Warrior Creed draws its trainers from the law enforcement and military special operations realm; it also utilizes very well-trained civilians who have been long-term students. All trainers focus on delivering the self-defense curriculum assigned to civilian customers from the general public. The training cadre focuses on applying the tactical use of specified firearms in self-defense scenarios and activities designed to "Prevent – Deter – Detect – Defend"™ against violent crimes.

5. Around 500 private citizens per year are trained by myself and/or my cadre in defensive firearms and tactics across multiple venues, and I estimate that over 8,000 have been trained since the company was founded. I estimate that 60% of the offered courses reach the maximum registration allowed. It is rare that courses are canceled for lack of registration; those that are sometimes canceled for lack of registration are usually very specialized courses outside the realm of the standard self-defense firearms and tactics courses. SRW, Inc./Warrior Creed would likely have more students but for the lack of quality venue availability. Were it not for that constraint, SRW, Inc./Warrior Creed could potentially double its training offerings and enrolled students. Our corporate experience reviewing ongoing training activity and related media has shown that the market for self-defense firearms training is larger than what is serviced by training companies and available training venues and facilities.

6. SRW, Inc./Warrior Creed's **defensive carbine** training courses are built around the most effective carbines for self-defense purposes. Such carbines are semi-automatic--so as

not to occasion multiple slow manipulations of charging systems--and utilize detachable magazines in order to facilitate efficient loading/reloading while under the rapidly unfolding threat of violence, and the changing of choice of cartridges for tactical reasons. The instructor cadre use such carbines because it is their individual chosen firearm for self-defense and also to effectively demonstrate the techniques required for effective utilization of the defensive firearms normally brought to our courses by students. The students attending the courses use these same firearms, as history, training, experience, and self-defense related firearm/training media have shown these firearms to be the most effective for use in self-defense situations. Additional features that are commonly found on the carbines of the instructor cadre and students, include: pistol grips or thumbhole stocks for the shooting hand, which improve ergonomic efficiency and increase comfort and safety by absorbing recoil; forward-mounted vertical or angled grips, which allows for enhanced control of the carbine during use so as to limit errant bullets and to increase effective self-defense firing; adjustable length or removable stocks, which allow for the carbine to be properly fitted to the user for efficient and controlled use of the carbine or folding stocks which can be folded alongside the carbine to shorten the profile and make it easier to utilize in tight spaces; flash suppressors designed to divert resulting muzzle flash during firing away from the shooter's field of vision in low light conditions, thus limiting the loss of "night vision" and the resulting deleterious effect on accuracy, as well as dampening recoil; shroud and/or "rail" systems attached to the barrel or that partially or completely encircles the barrel and allow the bearer to grasp the for-end of the rifle with the non-firing hand without being burned, as well as to attach additional devices, such as flashlights for positively and correctly identifying legitimate threats before engagement with the firearm. Every instructor and virtually every attendee of the course uses detachable magazines that have a capacity exceeding 10 rounds with their carbine.

Many attendees of the carbine courses utilize a compact version of the AR-15 platform, known as an "AR Pistol." With barrels as short as 7.5 inches, these firearms do not have a standard stock. Instead, because they almost always have a buffer tube extending behind the receiver, they often use a taut sling as a shooting support to replace the stock, or are fitted with a "foot" on the end of the buffer tube or an arm brace or other part that protrudes horizontally behind the pistol grip designed to shoulder the carbine for control during firing to increase accuracy and rapid follow up. These firearms are configured in the same way as their longer barreled companions, as they are used in the same manner and with the same defensive operating techniques. Their short length and compact size make them ideal for self-defense, particularly in very close areas such as homes. Almost all of the SRW, Inc./Warrior Creed cadre own and utilize these "AR Pistol" carbines, as they are generally considered the ideal self-defense firearm in the defensive firearms industry. I share that opinion.

7. In SRW, Inc./Warrior Creed's **defensive pistol** training courses, we require attendees to use a semiautomatic pistol that accepts detachable magazines and is .380 or larger in caliber, with 9mm being the preferred choice and .40 and .45 calibers also being present. Often seen in courses are a variety of large and small pistols, from full-size to sub-compacts, as these are the preferred pistols for self-defense and related training. Semiautomatic is ideal because of the immediate availability of rapid follow up for engaging a continuing threat or dealing with multiple threats, as well as the ease of single hand use when only one hand is available to work the pistol. Magazine capacity is a significant issue. As a general matter, the more cartridges that can be immediately fed into the pistol as needed, the better. Effective self-defense training



requires rapid and measured repeat firing to mimic real-life scenarios, and larger magazine capacities enable such training. Additionally, every self-defense situation is a novel event and how much ammunition is available in the gun can be critical. It is a common axiom among experienced trainers, particularly those like me who have engaged in self-defense shootings, that “there is no such thing as too much ammo.” Of course, there can be, given that the amount of ammunition increases a firearm’s weight, which can in turn diminish the self-defense benefits. But the amount of ammunition required to result in such diminishing returns is far above 15 rounds. Relatedly, accessories, such as barrels threaded at the muzzle for the attachment of sound suppressors and barrel compensators to reduce recoil to allow for greater accuracy in necessary follow up shots, are very common in courses and in effective self-defense firearms training and use.

8. During SRW, Inc./Warrior Creed’s **defensive shotgun** training courses, approximately 60% of attendees use semiautomatic shotguns, the others use a pump style shotgun. Detachable box magazines used with semiautomatic shotguns are a common and ever growing presence in the courses, particularly as more manufacturers create better designed detachable box magazine models of semiautomatic defensive shotguns. All have a pistol grip, either a traditional or a vertical grip, with vertical grips making up around 60% and growing. I regularly see a vertical or slanted grip on the fore-end of both pump and semiautomatic shotguns to facilitate control and recoil mitigation. Virtually all defensive shotguns have either a detachable box magazine or a tubular magazine that has a capacity over 5 rounds.

9. In addition to conducting training, I have attended many external self-defense firearms and tactics courses as a student and/or observer and have had numerous related discussions with other national and international instructors of my level. I have also observed other instructors and training courses on common firearm self-defense media. As a result, it is my opinion that there is very little variance in the requirements for firearms, features, magazines, accessories, etc., among quality instructors and training programs. Virtually all of them of which I am aware have the same general requirements, those requirements being necessary for conducting effective self-defense related firearms training and use. And most attendees in these courses, in my experience, generally use the same types of firearms.

10. As a professional in the firearms training field, I do my best to stay informed of the latest developments in the industry, including staying up to date on which firearms are available and popular for self-defense and self-defense related training and competition purposes. The self-defense firearms industry, of which I am a part, offers a vast amount of products and services surrounding firearms that Illinois restricts. Industry shows, training events, trade journals, and various media I look to offer countless examples of the viability of these firearms for self-defense and self-defense related training and competition. There are several regular publications that feature popular firearms that people in the industry and gun enthusiasts consult to know what products are available and popular. One of the most historic and well-respected is *Gun Digest* (originally “*The Gun Digest*”), which has been in print since 1944. It is considered by those in the industry to be an encapsulation of the firearm market. Another, *Guns & Ammo*, has been releasing monthly issues since 1958. Even a cursory review of recent editions of these publications and others demonstrates the overwhelming popularity of the firearms and related

parts that Illinois restricts. AR and AK platform rifles regularly appear on the cover of issues of those publications. For example:



This is not a new development, as these magazines, as well as many other publications, trade journals, websites, and other sources, have prominently featured semiautomatic firearms of the kind Illinois restricts for decades and it only seems to be increasing.

11. Based on my experience having trained or witnessed thousands of civilians in self-defense courses who bring their personal firearms; my personal education and training on firearms and self-defense over many years, including speaking with and observing other quality trainers and courses; and the vast market that exists for such firearms and their related products, it is my opinion that the following firearms are commonly possessed by the American public for lawful personal defense and training therefor:

- a. Semiautomatic rifles/carbines that accept detachable magazines and have one, multiple, or all of the following features:
  - i. a pistol grip or thumbhole stock;
  - ii. a protruding grip that can be held by the non-trigger hand;
  - iii. an adjustable, folding, or detachable stock;
  - iv. a flash suppressor; and

- v. a shroud attached to the barrel or that partially or completely encircles the barrel, allowing the bearer to hold the firearm with the non-trigger hand without being burned, but excluding a slide that encloses the barrel.
- b. Semiautomatic pistols that accept detachable magazines and have one, multiple, or all of the following features:
  - i. a threaded barrel;
  - ii. a second pistol grip or another feature capable of functioning as a protruding grip that can be held by the non-trigger hand;
  - iii. a shroud attached to the barrel or that partially or completely encircles the barrel, allowing the bearer to hold the firearm with the non-trigger hand without being burned, but excluding a slide that encloses the barrel;
  - iv. a flash suppressor;
  - v. the capacity to accept a detachable magazine at some location outside of the pistol grip; and
  - vi. a buffer tube, arm brace, or other part that protrudes horizontally behind the pistol grip and is designed or redesigned to allow or facilitate a firearm to be fired from the shoulder.
- c. Semiautomatic shotguns that have:
  - i. a pistol grip;
  - ii. a vertical or slanted for-end grip;
  - iii. a fixed magazine with the capacity of more than 5 rounds; or
  - iv. the capacity to accept a detachable magazine.

12. It is my further opinion that such semiautomatic pistols, shotguns, and rifles/carbines are, in fact, well suited for defensive uses both inside and outside of the home when the correct ammunition is used, as well as for effective self-defense training in order to prepare for legal firearms self-defense. In other words, the large number of people that choose these arms for self-defense related purposes are not making bad choices; to the contrary, they are making wise choices. I base my opinion on my many years of receiving, observing, and providing training and education on self-defense firearms (see my background and curriculum vitae provided herewith), as well as the industry and media information provided about these arms.

13. I base self-defense firearm training on three primary critical tasks. Critical Task #1 is to make sound and timely shooting decisions. The criteria upon which this decision is based are: (1) Is it legal, in other words, does the imminent use of force meet the elements codified within the criminal code; (2) Is it ethical, a reasonable action based on the circumstances surrounding the situation, and; (3) Is it moral? Critical Task #2 is to place timely and accurate shots on target, i.e., ensure accuracy of the shots so any collateral risk is unlikely. Critical Task #3 is to keep the firearm working until the threat is gone. This includes reloading and immediate action for stoppages of fire. Under each of the Critical Tasks are a series of sub-tasks which enable the completion of the primary task. As an example, a sub-task under Critical Task #1 would be, "positively identify the threat." Many of the sub-tasks are enhanced by, or efficiently accomplished because of, the features on the firearm that Illinois restricts described above. As an example, one cannot positively identify the threat in reduced light conditions unless a



weapon-mounted light (WML) is on the firearm and the WML cannot be mounted on the firearm unless a barrel shroud or rail system handguard is on the firearm so the WML can be mounted.

14. It is my opinion that limiting a defensive carbine to a 10-round or less capacity, a defensive shotgun to a 5 round or less capacity, or a defensive pistol to a 15-round or less capacity, disadvantages the defender in both effective defensive firearm training and actual defensive firearm use. As previously stated, the general rule of thumb is that the more ammunition immediately available the better. In my personal experience, including interacting with trainers of a similar background and experience, that generally does not occur until you reach magazines having a capacity well in excess of those respective limits. Keeping the firearm working until the threat is gone includes having sufficient rounds of ammunition in the magazine, with the magazine in the firearm, so as to be prepared for a protracted self-defense gunfight.

15. It is my opinion that a **pistol grip** on a semiautomatic carbine or shotgun capable of accepting detachable magazines can aid self-defense in multiple ways, some of which are: positioning the hand for optimal trigger control and access to the firearm's safety and magazine release; sharing of absorption of the firearm's recoil through the hand as well as the shoulder, thus aiding in accuracy and rapid follow up shots as needed; allowing the defender to grasp the firearm in a way that makes dropping it or having it taken away in a struggle with an attacker less likely; and, facilitating one-handed use of the firearm in case the other hand is injured or needed to perform some other task (e.g., calling 911). In summary, a pistol grip can increase the defender's control of the firearm, thus improving accuracy and facilitating safe use of the firearm, while decreasing the likelihood of an attacker disarming the defender and increasing the defender's ability to use one hand to perform additional functions, all of these factors play a potentially substantial role in ever-dynamic and unpredictable self-defense scenarios. The pistol grip plays an important role in keeping the gun properly aimed to place rounds on target and not off the target, thus creating additional risk to uninvolved persons. Indeed, the straight-line design of many of these rifles (including the AR-15 platform) essentially requires a pistol grip to properly hold and operate the firearm.

16. It is my opinion that a **forward grip** on a defensive carbine, shotgun, or pistol can aid self-defense in multiple ways, some of which are: it offers the defender options for grasping the firearm with their forward hand in various ways conducive to effective individual control of the firearm, based on physiology, adverse weather, or other conditions, and, thereby, enhancing safe handling and effective use of the firearm, particularly under the stress of a self-defense situation. A forward grip also allows defenders to grasp the firearm in a way where their forward hand is less likely to move or slip while firing. In sum, a forward grip can increase the defender's control of the firearm, which can improve accuracy and facilitate the firearm's safe use, all of which facilitate effective self-defense. A forward grip on a defensive firearm also enhances firing accuracy, helping meet Critical Task #2.

17. It is my opinion that an **adjustable stock** (which includes a telescoping stock) can be critical on a defensive long-gun (rifle/carbine/shotgun). There is no one-size-fits-all stock for long-guns. User-adjustable stocks are simply an acknowledgement that people come in different sizes. Different sizes of people need different length stocks to place their faces in the ideal

position for aiming and their arms in the most comfortable position for grasping and thus safely controlling the firearm. Obviously, a professional basketball player and a jockey require significantly different length stocks. The ability to increase or decrease the length of the stock makes it so that the long-gun can properly fit people of different statures (e.g., a large or small adult, or elderly person) or the same person when wearing different clothing (e.g., a heavy jacket versus a t-shirt). Just like crutches are often adjustable to correspond to peoples' various arm-lengths so that one crutch can conform to the optimal length for multiple people, such is the function of an adjustable stock. But for adjustable stocks, people would need to search for a long-gun with a stock that fits them specifically. Even then, a fixed stock would not accommodate clothing change or allow for the safe operation of the long-gun by another person of a different stature, such as the owner's spouse or child. Adjustable stocks usually only allow the stock to change length by a few inches. While those inches can be critical for proper use of the long-gun by the user, they are negligible in concealing the long-gun. Similarly, detachable stocks allow people to change the stock to one they prefer the fit of. They also allow for safe storage and transport, as do folding stocks. A properly fitted stock, one with a "pull length" based on the physiology of the defender, necessitates the use of an adjustable stock so as to enhance the likelihood of accurate firing based on Critical Task #2.

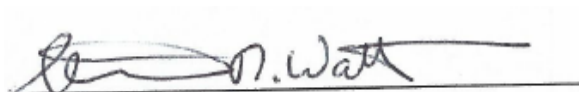
18. It is my opinion that a **flash suppressor** aids defensive use of a rifle or pistol in two ways. One, it diverts flash from the shooter's field of vision, which can mitigate the loss of "night-vision" when firing in low light conditions, such as in an unlighted hallway at night. Clear vision is obviously extremely important when using a firearm in a self-defense situation so that the shooter can positively identify a threat target, place rounds on target, and know if and when the threat has been neutralized to cease firing. Two, a flash suppressor slightly reduces felt recoil, i.e., the energy pulse pushing back against the firearm and user, colloquially referred to as the "kick," which causes the muzzle of the firearm to rise off target. It does so by allowing some of the gases propelling the bullet down the barrel to escape out of its vents, the energy from which gases would otherwise transfer back into the user's shoulder or hand in the form of recoil. Less recoil facilitates improved accuracy on follow-up shots at a faster rate, which can be critical in a self-defense situation where multiple shots are required. The flash suppressor, by diverting the flash away from the defender's field of vision, enhances continual positive identification of the threat, leading to effective accomplishment of Critical Task #1. By reducing felt recoil, the flash suppressor also helps in the accomplishment of Critical Task #2, timely and accurate delivery of rounds on target.

19. It is my opinion that a "**barrel shroud or rail system**" that is attached to the barrel or that partially or completely encircles the barrel of a defensive rifle/carbine or pistol, allowing the defender to grasp the firearm with the non-firing (forward) hand without being burned is critical for their use generally, but especially for self-defense. Indeed, it is a feature found on virtually every semiautomatic rifle/carbine and AR-pistol in existence. That is because being able to grasp the front end of a long-gun or AR-pistol is critical for properly and effectively using it for any purpose, including self-defense. Not being able to do so precludes the effective use of the firearm and could create unsafe or ineffective use. A "barrel shroud" or "rail" also allows for the attachment of accessories that aid self-defense, sometimes critically, such as a flashlight, which enables positive identification of a legitimate threat and when that threat is neutralized.

**COMPENSATION**

I am being compensated at the rate of \$275.00 per hour.

Dated: May 10, 2024



Steven R. Watt

**Use of Force Expert Experience:**

Steven R. (Randy) Watt, hereinafter referred to as “I,”

I was retained by the Salt Lake County District Attorney’s Office as an expert to review an OIS in which Delorean Pikyavit was shot and killed by Sgt. Joshua Allred, Salt Lake PD SWAT, during a SWAT standoff. I was originally retained on 1/14/21 and I reviewed numerous documents, videos, and photos, and I visited the scene of the shooting. I rendered a verbal opinion only, at the request of the DA’s Office, that the shooting was justified, reasonable, and in accordance with law and Salt Lake PD policies. I have since been re-retained for the purpose of writing an opinion. I then testified in the Grand Jury Hearing and was able to gain a no bill for Sgt. Allred.

I was retained by the U.S. Attorney’s Office, Albuquerque, N.M., in the material support to terrorism case of the United States vs. Jany Leveille, Siraj Ibn Wahhaj, Hujrah Wahhaj, Subhanah Wahhaj, and Lucas Morton, as the government’s expert on terrorist tactics, techniques and procedures. I provided an opinion on this case, testified in a Daubert Hearing and was found to be an expert with broad experience to testify, and testified in the trial with 9 hours on the stand. A unanimous jury verdict of guilty was received on all charges for two of the defendants, and the major charges for two other defendants. Jany Leveille had pled guilty just prior to the trial.

I am currently retained by Robert M. Stein, Associate Attorney for the firm of Rennert, Vogel, Mandler, and Rodriguez, P.A., of Miami, Florida, as the plaintiff’s expert on Active Shooter Response and School Security in preparation for litigation due to the death and injury of numerous students in a school shooting event. I have provided an opinion in this case.

I am currently retained by the Washington State Office of the Attorney General, serving as the defendant’s expert in the use of force, in the case of Patrick Nelson & Colette Rapp v. Department of Corrections, et. al. The case is currently in motions.

I was retained by the U.S. Attorney’s Office, Albuquerque, N.M., in the Capital Homicide case of the United States v. Kirby Cleveland as the government’s expert on “use of force” and “officer survival tactics.”. I provided an opinion and have been prepared for testimony in this case. Kirby Cleveland pled guilty to Criminal Homicide and related charges in 2021.

I was retained by the U.S. Attorney’s Office, Albuquerque, N.M., in the Homicide case of the United States vs. Brandon Charley, as an expert in the use of firearms for the U.S. Attorney’s Office. I have provided an opinion on this case and have testified in court. My expertise was stipulated to by the defense. Brandon Charley pled guilty in 2021.

I was retained by the Garcia Group, PLLC, of Detroit, MI, serving as the defendant's expert in the case of *The Estate of Aiyana Stanley-Jones v. Officer Joseph Weekley, et al.*, of the Detroit Police Department. I was deposed by Plaintiff in this case, case was scheduled for trial in the City of Detroit, but was placed on hold when the Plaintiff's Attorney withdrew from the case. The case has since been settled.

I was retained by the Salt Lake Legal Defenders Office as a Use of Force, Firearms, advisor for defense counsel in the case preparation for the murder trial of Joseph Eugene Robinson. I provided pre-trial expert advice for Attorney Charity Shreeve on how certain firearms function.

I was retained by the City of Vancouver, Washington, in the case of *Franks v. City of Vancouver, WA*, serving as the defendant's Use of Force expert, and reviewed documents. The case was dismissed by the court on September 13<sup>th</sup>, 2016, as plaintiffs appeared to have abandoned the suit.

I was retained by the City of Vancouver, Washington, in the case of *Andison v. City of Vancouver, WA*. I reviewed documents, and prepared and submitted a report to defense counsel. I was scheduled for deposition in Vancouver, but the case was ordered settled by the insurance provider for the City of Vancouver.

I was retained and served as the defendant's SWAT and tactical expert in the case of *Brough v. Safariland, et al., St. Clair County Circuit Court Case No. 07-L-0358*. Attorney Keith Phoenix of Sandberg, Phoenix and Von Gontard, P.C., St. Louis, MO, was the lead attorney. I provided document review, analysis, and assessment, and was deposed by the plaintiff. The case was ultimately settled in August of 2011.

In 1988, I testified as a Use of Force expert in a civil case in the Salt Lake City District Court. I no longer have the details of that case. In that case, a private security guard had used a set of nunchakus to defend himself against an assault by a drunken trespasser, resulting in injury to the trespasser and giving rise to the suit.

I have testified in numerous cases during my police career, spanning everything from misdemeanor crimes to homicides. I have also provided an opinion to the prosecuting and/or reviewing attorneys in use of force cases and internal affairs investigations.

I am considered an expert in terrorism and have provided responses to the U.S. Military Commissions and U.S. Department of Justice in terrorism cases. I have given depositions in and testified in the case of *U.S. v. Khadr, Guantanamo Bay Detention Center and Court, Guantanamo Bay, Cuba*.