

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS

CALEB BARNETT, et al.,)
Plaintiffs,)
-vs-) No. 3:23-cv-209-SPM
KWAME RAOUL, et al.,)
Defendant.)

The deposition of JIM CURCURUTO, called for examination pursuant to the Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken before Raelene Stamm, a Certified Shorthand Reporter licensed by the State of Illinois, at 330 North Wabash Street, Suite 3300, Chicago, Illinois, on the 13th day of June, 2024, at the hour of 10:00 a.m.

Reported by: RAELENE STAMM, CSR
License No.: 084-004445

Page 2	<p>1 APPEARANCES:</p> <p>2</p> <p>3 SWANSON MARTIN & BELL, LLP</p> <p>4 BY: MR. ANDREW A. LOTHSON</p> <p>5 MR. JAMES B. VOGTS</p> <p>6 330 North Wabash Avenue</p> <p>7 Suite 3300</p> <p>8 Chicago, Illinois 60611</p> <p>9 (312) 321-9100</p> <p>10 alothson@smbtrials.com</p> <p>11 jvogts@smbtrials.com</p> <p>12 On behalf of the Plaintiff;</p> <p>13</p> <p>14 STATE OF ILLINOIS</p> <p>15 OFFICE OF ATTORNEY GENERAL</p> <p>16 BY: MR. CHRISTOPHER G. WELLS</p> <p>17 MR. JOHN HAZINSKI</p> <p>18 115 South LaSalle Street</p> <p>19 Chicago, Illinois 60603</p> <p>20 (312) 814-8570</p> <p>21 christopher.wells@ilag.gov</p> <p>22 john.hazinski@ilag.gov</p> <p>23 On behalf of the Defendants.</p> <p>24</p>	Page 4
Page 3	<p>1 ALSO PRESENT:</p> <p>2</p> <p>3 SHELBY BAIRD SMITH, ESQ., NSSF</p> <p>4</p> <p>5 ALSO PRESENT: (Via video conference)</p> <p>6</p> <p>7 DAVID G. SIGALE</p> <p>8 THOMAS G. MAAG</p> <p>9 T. ADAM HOERNER</p> <p>10 KERRY BANAHAN</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	Page 5

I N D E X	
1 WITNESS	EXAMINATION
2 JIM CURCURUTO	
3 By Mr. Hazinski	6
4 By Mr. Lothson	180
5 By Mr. Hazinski (Further)	182
6 By Mr. Maag	190

E X H I B I T S	
1 NUMBER	IDENTIFICATION
2 Curcuruto Deposition	
3 Exhibit 1	38
4 Exhibit 2	61
5 Exhibit 3	66
6 Exhibit 4	99
7 Exhibit 5	115
8 Exhibit 6	117
9 Exhibit 7	154
10 Exhibit 8	161
11 Exhibit 9	166

Page 6

1 (WHEREUPON, the witness was
 2 duly sworn.)
 3 JIM CURCURUTO,
 4 called as a witness herein, having been first duly
 5 sworn, was examined and testified as follows:
 6 EXAMINATION
 7 BY MR. HAZINSKI:
 8 Q. Good morning, Mr. Curcuruto. My name is
 9 John Hazinski. I'm an attorney for the defendants
 10 in the Barnett case, Attorney General Kwame Raoul,
 11 Illinois State Police Director Brendan Kelly.
 12 You've been deposed before, correct?
 13 A. Yes.
 14 Q. About how many times?
 15 A. Seven, I believe.
 16 Q. You're a bit of an old hand at this, but
 17 I'll go over some ground rules just to make sure
 18 everything runs smoothly today.
 19 A. Sure.
 20 Q. Today you were just sworn in.
 21 Do you understand that you're under oath
 22 the same as if you were testifying in court?
 23 A. Yes.
 24 Q. Since the court reporter here is taking

Page 7

1 down everything we say, I'll try to do my best to
 2 avoid talking over you, and I ask that you try to
 3 do the same, okay?
 4 A. Yes.
 5 Q. If I ask a question that you don't
 6 understand, please ask me to clarify. Because if
 7 you do answer the question, I'll assume that you
 8 understood it; is that fair?
 9 A. Yes.
 10 Q. From time to time the lawyers may
 11 interpose objections which is all right. You
 12 should answer the question even if there is an
 13 objection. The exception to that is only if you're
 14 expressly instructed not to answer.
 15 Does that make sense?
 16 A. Yes.
 17 Q. You are welcome to take a break whenever
 18 you'd like, but I just ask that you not take a
 19 break while I have a question pending; is that
 20 fair?
 21 A. Yes.
 22 Q. Do you have any medical conditions or are
 23 you on any medication that could interfere with
 24 your ability to give truthful testimony today?

Page 8

1 A. No.
 2 Q. Could you please state your full name for
 3 the record?
 4 A. James Curcuruto.
 5 Q. Could you spell your last name, please?
 6 A. C-U-R-C-U-R-U-T-O.
 7 Q. What did you do to prepare for they
 8 deposition?
 9 A. Received a call from Larry Keen from NSSF,
 10 oh, a month or so ago.
 11 (Reporter clarification.)
 12 THE WITNESS: Received a call from Larry Keen
 13 about a month or so ago asking if I was available
 14 to do this. I said yes, and he introduced me to
 15 Jim Boats who I had worked with previously.
 16 And Jim sent me, I believe, three
 17 different documents to review. One was some old
 18 emails while I was employed at NSSF. Another was a
 19 deposition that I had done, a transcript of it,
 20 from I believe 2013, I believe Cook County. And
 21 the third was a copy of a deposition that was just
 22 done of Salam from NSSF. And I reviewed those
 23 documents.
 24 Q. Just those three documents in total that

Page 9

1 you reviewed?
 2 A. I had also taken up -- well -- I know we
 3 had a phone call to discuss procedure and along the
 4 lines there, but I believe those are the three main
 5 documents. I can't recall if I looked at anything
 6 else in detail.
 7 MR. VOGTS: Could I interrupt? An attorney,
 8 apparently David Sigale, wants to get in. He says
 9 he has to be admitted.
 10 (WHEREUPON, a discussion was had
 11 off the record.)
 12 BY MR. HAZINSKI:
 13 Q. So you mentioned talking to Jim?
 14 A. Correct.
 15 Q. And is he representing you today for the
 16 purposes of this deposition?
 17 A. I believe Andrew is.
 18 MR. LOTHSON: I am. We are, yes.
 19 BY MR. HAZINSKI:
 20 Q. Okay. Now, I don't want to know anything
 21 you spoke about with the attorneys that are
 22 representing you because that's privileged, but can
 23 you tell me how many times you met with them or
 24 spoke with them to prepare?

Page 10

1 A. One, maybe two phone calls with Jim, and
 2 then yesterday I met with Jim and Andrew here.
 3 Q. How long was that meeting yesterday?
 4 A. About an hour.
 5 Q. And you mentioned reviewing three
 6 documents, the transcript of the deposition of
 7 Salam Fatohi, a transcript from a Cook County case
 8 you estimated in 2013, and what was the other
 9 document?
 10 A. Let's see. I got some emails that I was
 11 part of prior to my departure from NSSF were the
 12 three that were sent to me via email, and then
 13 yesterday we did briefly review or talk about, not
 14 in detail, a firearm retailer survey and a modern
 15 sporting rifle study that I had worked on
 16 previously, and a magazine chart as well.
 17 Q. Other than those did you review any other
 18 documents in preparation for the deposition?
 19 A. I don't believe so.
 20 Q. You mentioned a phone call with Larry
 21 Keen. Who is Larry Keen?
 22 A. Larry Keen is general counsel at National
 23 Shooting Sports Foundation.
 24 Q. Other than Larry Keen and your attorneys,

Page 11

1 did you discuss this deposition with anybody else?
 2 A. Just my wife to let her know I'd be down
 3 here.
 4 Q. Are you being compensated for your
 5 testimony here?
 6 A. I am. NSSF is gonna be covering my travel
 7 costs and hourly rate.
 8 Q. And what's your hourly rate?
 9 A. \$150 per hour.
 10 Q. Where are you currently employed?
 11 A. I am executive director of Outdoor
 12 Stewards of Conservation Foundation.
 13 Q. What are your responsibilities in the role
 14 of executive director?
 15 A. I run the entire organization. It's a
 16 nonprofit organization.
 17 Q. What is the purpose of that organization?
 18 A. Our mission is to work with all groups to
 19 help support recruitment of new hunters, anglers,
 20 trappers and shooters, and promote the positive
 21 contributions of what we call HATS, H-A-T-S, which
 22 stands for hunters, anglers, trappers and shooters.
 23 Q. Do you have any employment other than your
 24 role at Outdoor Stewards of Conservation?

Page 12

1 A. I also have a LLC for some consulting
 2 called Outdoor Insights, LLC.
 3 Q. What's the purpose of that LLC?
 4 A. Just to -- if I have somebody that is
 5 looking to hire somebody for support on research on
 6 the hunting industry or outdoor industry, that's
 7 kind of my arm for that as well.
 8 So, for example, if somebody needed me for
 9 a place like today, I could help out through the
 10 Outdoor Insights as well or -- you know, with this
 11 instance I'll probably just bill under
 12 Jim Curcuruto as a personal one.
 13 Q. So who are your typical clients for your
 14 consulting work?
 15 A. It's been a while. You know, when I first
 16 left NSSF I did some research projects for some
 17 manufacturers within the firearms and ammunition
 18 industry. And I also use that to consult for some
 19 grant work on conservation focused grant work, wild
 20 life conservation.
 21 Q. Which firearms manufacturers were your
 22 consulting clients?
 23 A. I prefer not to answer just out of
 24 confidentiality.

Page 13

1 Q. Did you -- did you reach agreements with
 2 those clients to keep the nature of your
 3 relationships confidential?
 4 A. No, more of a personal business decision.
 5 Q. How many firearms manufacturers have you
 6 had as clients?
 7 A. More ammunition manufacturers. One
 8 firearm, one ammunition.
 9 Q. So you had one client who is a firearm
 10 manufacturer, one client that was an ammunition
 11 manufacturer and no others; is that fair?
 12 A. Correct. Other than the grant work that I
 13 did for conservation.
 14 Q. The firearms manufacturer that was your
 15 client, can you describe in general terms the kinds
 16 of things they manufactured?
 17 A. Handguns and long guns.
 18 Q. In the past have you stated that you were
 19 available to testify as an expert witness on behalf
 20 of the firearms industry?
 21 A. Correct.
 22 Q. Have you ever done so?
 23 A. Through the depositions.
 24 Q. Were you retained by the parties in those

Page 14

1 cases to provide that testimony, meaning paid for
 2 that testimony?
 3 A. I believe so in 2021, maybe January or
 4 February, one case I did get paid.
 5 Q. Did you prepare written reports in any of
 6 those cases?
 7 A. I don't recall.
 8 Q. Have you prepared a written report in this
 9 case?
 10 A. I don't believe I did.
 11 Q. And just for context or clarity, this is a
 12 case concerning a law called the Illinois --
 13 Protect Illinois Communities Act regulating assault
 14 weapons and large capacity magazines in the State
 15 of Illinois.
 16 Before you worked at Outdoor Stewards of
 17 Conservation where did you work?
 18 A. I had the consulting business that I
 19 started right after I left National Shooting Sports
 20 Foundation, and prior to that I was with National
 21 Shooting Sports Foundation for 11 years.
 22 Q. I want to the circle back briefly on the
 23 consulting work.
 24 What was the nature of the research

Page 15

1 projects that you conducted for firearms
 2 manufacturers?
 3 A. Firearms and ammunition industry research.
 4 Q. When you say industry research, can you
 5 clarify what that means?
 6 A. Market on firearms and ammunition.
 7 Q. Does that refer to the consumer market?
 8 A. Consumer market, yes.
 9 Q. And approximately when did you engage in
 10 those research projects?
 11 A. Early 2021.
 12 Q. Both of them?
 13 A. Correct.
 14 Q. What was your first role at NSSF?
 15 A. Director of industry research and analysis
 16 I believe was my original title.
 17 Q. What were your responsibilities in that
 18 role?
 19 A. I directed most of the consumer related
 20 research and business related research for National
 21 Shooting Sports Foundation. I managed one direct
 22 report as well as several relationships we had with
 23 outside researching agencies.
 24 Q. Who was the direct report you managed?

Page 16

1 A. Dianne Vrablic.
 2 Q. Did you have any other roles at NSSF?
 3 A. I did switch titles maybe -- trying
 4 to -- 2017, '18, approximately to director of
 5 research and market development.
 6 Q. How did your responsibilities change, if
 7 at all, when you made that transition?
 8 A. I added -- kept what I had and added
 9 responsibilities for what is called recruit,
 10 retain, reactivate, or what we called R3, new
 11 customers to the market, keep the ones that you
 12 have and reactivate lapsed participants.
 13 Q. In your lateral role at NSSF, did you
 14 supervise anyone other than Dianne Vrablic?
 15 A. Not directly.
 16 Q. Was that a department of its own within
 17 NSSF?
 18 A. A team of two.
 19 Q. A team of two.
 20 Was that team of two responsible for
 21 conducting all of NSSF's research endeavors?
 22 A. The vast majority consumer. They also had
 23 a legal team that did more of the legislative
 24 research.

Page 17

1 Q. Did anyone at NSSF ever express any
 2 concerns about the overall quality of your work?
 3 A. At NSSF, no.
 4 Q. Did anyone at NSSF ever express any
 5 concerns that the results of your research or
 6 analysis were not accurate?
 7 A. Not that I recall.
 8 Q. These days are you in touch with anyone at
 9 NSSF on a regular basis?
 10 A. You want to define regular?
 11 Q. Do you speak to anyone at NSSF more than
 12 once a year?
 13 A. Yes.
 14 Q. Who?
 15 A. Dianne Vrablic, catch up with her and see
 16 how the family's doing on a quarterly basis. And
 17 then I consult for NSSF on a project with the team
 18 lead being John McNamara.
 19 Q. What's the nature of that project?
 20 A. It's regarding building shooting ranges
 21 with excised tax dollars for state wild life
 22 agencies to have more recreational opportunities
 23 for folks to go target shooting.
 24 Q. Other than that project, do you have any

<p style="text-align: right;">Page 18</p> <p>1 other -- strike that.</p> <p>2 Other than that project, since you left</p> <p>3 NSSF have you had any other business or</p> <p>4 professional relationship with that organization?</p> <p>5 A. I believe that's it.</p> <p>6 Q. Your relationship with Dianne Vrablic, is</p> <p>7 that strictly personal or is it also an ongoing</p> <p>8 professional relationship?</p> <p>9 A. 95 percent personal just to catch up with</p> <p>10 her family and kids and hear her stories. Every</p> <p>11 once in a while we might talk about the latest</p> <p>12 research project or something along the lines</p> <p>13 there.</p> <p>14 Q. Does she still work at NSSF?</p> <p>15 A. Yes.</p> <p>16 Q. In a research capacity?</p> <p>17 A. I believe so.</p> <p>18 Q. Do you ever discuss the research that</p> <p>19 they're doing?</p> <p>20 A. Very top level, not in detail. I'd rather</p> <p>21 hear about her kids.</p> <p>22 Q. Since you left NSSF has anyone at that</p> <p>23 organization, other than Larry Keen when he called</p> <p>24 you recently, contacted you to specifically discuss</p>	<p style="text-align: right;">Page 20</p> <p>1 coursework was?</p> <p>2 A. Just part of the requirements to get a</p> <p>3 business degree.</p> <p>4 Q. Have you received any other formal</p> <p>5 education in statistics apart from that?</p> <p>6 A. I don't believe so. I did some continuing</p> <p>7 education at places like Merrick of Management</p> <p>8 Association, Burke Institute, primarily more</p> <p>9 research focused.</p> <p>10 Q. Can you describe that work?</p> <p>11 A. I believe one of the classes I took with</p> <p>12 Burke Institute was focus group moderation, and</p> <p>13 another one may have been survey questionnaire</p> <p>14 development.</p> <p>15 Q. When did you take those courses?</p> <p>16 A. Approximately 2012 to 2015.</p> <p>17 Q. Through your professional experience and</p> <p>18 your coursework have you developed any familiarity</p> <p>19 with statistical or research methods?</p> <p>20 A. I worked very closely with several Ph.D.s</p> <p>21 and statisticians for 11 years. And I learned, you</p> <p>22 know, from them as I was going, but nothing formal.</p> <p>23 Q. When you were acting as a director of</p> <p>24 research at NSSF, did you feel that you had an</p>
<p style="text-align: right;">Page 19</p> <p>1 your work there?</p> <p>2 A. I don't believe so. It's been about four</p> <p>3 years. So there may have been a call along the</p> <p>4 lines, but nothing that I can recall.</p> <p>5 Q. Did anyone ever -- from NSSF ever call you</p> <p>6 expressing any concerns about your work or your</p> <p>7 research there in the time since you left?</p> <p>8 A. No.</p> <p>9 Q. What's your highest level of education?</p> <p>10 A. Bachelor of Science in 1993 in business</p> <p>11 management.</p> <p>12 Q. Did you also receive a bachelor's in</p> <p>13 business administration?</p> <p>14 A. I believe it was associate's from SUNY</p> <p>15 Cobleskill, and then a bachelor's from University</p> <p>16 of North Carolina, Wilmington.</p> <p>17 Q. Other than those programs do you have any</p> <p>18 other college or university level education?</p> <p>19 A. I do not.</p> <p>20 Q. Did you take any statistics classes for</p> <p>21 your degrees?</p> <p>22 A. I believe I took statistics somewhere</p> <p>23 along my college career.</p> <p>24 Q. Do you know what the nature of that</p>	<p style="text-align: right;">Page 21</p> <p>1 understanding of basic statistic principles?</p> <p>2 A. I left that up to the folks that we</p> <p>3 contracted.</p> <p>4 Q. Did you contract for all of NSSF research</p> <p>5 or just for some of it?</p> <p>6 A. Some.</p> <p>7 Q. In cases where the research was being done</p> <p>8 by NSSF and not a contracted organization, who was</p> <p>9 responsible for overseeing the statistical aspects</p> <p>10 of that research?</p> <p>11 A. We did internally several simple, not very</p> <p>12 statistically heavy oriented projects such as</p> <p>13 surveys to our membership and creating Excel type</p> <p>14 of documents that were simple math, not statistical</p> <p>15 analysis.</p> <p>16 Q. Fair to say that the research that NSSF</p> <p>17 was conducting in-house was of a nature that didn't</p> <p>18 require in your view a high degree of statistical</p> <p>19 organization?</p> <p>20 A. Correct.</p> <p>21 Q. Do you have an understanding of the term</p> <p>22 sample size?</p> <p>23 A. I do.</p> <p>24 Q. Generally speaking, what's that?</p>

Page 22

1 A. When you send out a survey, for example,
 2 you want to reach a minimum requirement sample size
 3 of people that have completed that study to
 4 receive, what we always used, a 95 percent
 5 confidence and 5 percent margin of error at a
 6 minimum on the stuff that we did. Whether that was
 7 internally or externally, that was what we strived
 8 to accomplish.
 9 Q. You used the term 95 percent confidence.
 10 Can you explain what that means?
 11 A. Sure. You have a hundred answers -- or if
 12 the answer to a question is a hundred, 95 percent
 13 of the time it's gonna be within 5 percent of that
 14 hundred.
 15 Q. Do you have an understanding of how to
 16 calculate the level of confidence associated with
 17 the sample?
 18 A. Yeah, there's formulas for that. You can
 19 just plug it in. We use the online formula. If
 20 your sample audience was a thousand, you plug that
 21 in. And to get a 95 and 5 confidence level, it
 22 would spit out, you need an N of X to meet that
 23 requirement. So that was what we tried to obtain.
 24 Q. And those were the standards you were

Page 23

1 applying in the research done at NSSF?
 2 A. The minimum, yeah.
 3 Q. When you were going through the hiring
 4 process at NSSF, do you recall whether anyone asked
 5 you about your knowledge of statistics or data
 6 analysis?
 7 A. I'm sure the topic came up, but that was
 8 in 2009, so it's been quite sometime.
 9 Q. Fair enough.
 10 Generally speaking, could you describe the
 11 purpose of the research that NSSF conducted while
 12 you were there?
 13 A. Sure. NSSF is a trade association for the
 14 firearms and ammunition industry. So one of the
 15 services or member benefits that we provided was
 16 industry research so our members would be more
 17 informed of current market decisions so they could
 18 make better business decisions.
 19 Q. Are there any other purposes of the
 20 research that NSSF was conducting?
 21 A. That was the primary one at the time. One
 22 of the other purposes was to use the findings, the
 23 insights we gained to then build programs to help
 24 with what we call the R3, you know, the recruit,

Page 24

1 retain, reactivate more participants in target and
 2 hunting shooting.
 3 Q. Were you aware when you worked at NSSF
 4 that any of their research or reports were being
 5 used in litigation?
 6 A. When I first started there was not a lot,
 7 if any, when I originally started discussion about
 8 litigation cases. It wasn't until several years
 9 into the employment that it seemed like that became
 10 more prevalent within the organization.
 11 Q. Approximately what year would that have
 12 been?
 13 A. Approximately, ballpark because it's been
 14 a while, 2012. So three years in maybe. I believe
 15 that was that first case in Cook County that kind
 16 of brought it to my attention anyways.
 17 Q. Do you recall what aspect of NSSF's
 18 research or analysis was at issue there?
 19 A. Sure. The primary -- the two primary
 20 parts that stand out are commonality of AR or AK
 21 platform firearms which we called modern sporting
 22 rifles, and the second was the magazine capacity
 23 handguns and long guns.
 24 Q. Did you have an understanding at the time

Page 25

1 of how NSSF's research would be relevant to those
 2 questions?
 3 A. Not specific to litigation, but certainly
 4 they were questions that our membership had
 5 questions about. And we had a long list of
 6 research topics that we needed to conduct to fill a
 7 lot of voids, and those were on the list.
 8 Q. Can you explain what you mean when you say
 9 that they were topics that your membership had
 10 questions about?
 11 A. Sure. So being the director of research
 12 and being a member-based organization, I would ask
 13 our members what -- you know, what would you like
 14 to know on the topics of the industry to help you
 15 better understand conditions and make better
 16 decisions.
 17 And I had a long list of everything from
 18 first-time gun buyers to female participation to
 19 market segmentation to economics to handgun market,
 20 modern sporting rifle market, those type of things.
 21 So I tried to check them off one at a time
 22 as what I thought was important, but modern
 23 sporting rifles was certainly a topic that a lot of
 24 our members had interest in.

Page 26

1 Q. How did you find out from membership that
 2 they were interested in those topics? Was it
 3 through any kind of formal survey or through
 4 informal conversations?
 5 A. Informal conversations.
 6 Q. Did you keep an actual written list of
 7 those topics?
 8 A. I would imagine I did. I just don't
 9 recall.
 10 Q. And since it was a long list, it sounds
 11 like you had to make judgments about which topics
 12 to prioritize?
 13 A. Correct, yeah.
 14 Q. Was anybody else besides you responsible
 15 for deciding on which topic NSSF would study next?
 16 A. You know, I had supervisors that I
 17 reported to, but -- maybe one or two times they may
 18 have suggested a topic, but they left it up to me
 19 which was kind of nice to have that freedom to go
 20 my own direction.
 21 Q. Why did you stop working at NSSF?
 22 A. I believe in January 2021 the SHOT show,
 23 which is shooting hunting outdoor trade show,
 24 S-H-O-T, is owned and operated by NSSF, and that is

Page 27

1 a large chunk of their revenue, and with COVID they
 2 did not have that SHOT show.
 3 So they had to make cuts, and my position
 4 was involved in the cuts. So I believe it was
 5 early January 2021 when I was let go.
 6 Q. So it sounds like it was a budgetary
 7 rationale?
 8 A. Correct.
 9 Q. Did anyone at NSSF ever tell you that you
 10 were being let go for reasons related to your
 11 performance?
 12 A. No, strictly financial decision.
 13 Q. Who made the decision to let you go?
 14 A. I assume it's the executive team.
 15 Q. Who was on the executive team at the time?
 16 A. I believe Larry Keen, Joe Bartozzi who's
 17 the president, Deb Kenny who was vice president of
 18 HR, and Chris Dolnack and John -- sorry, John our
 19 CFO at the time. I don't recall his last name at
 20 this time. Sorry.
 21 Q. Do you know whether anyone replaced you in
 22 your role once you left?
 23 A. I don't know if they did immediately, but
 24 there was somebody that had worked -- Salam, who

Page 28

1 had worked on the legislative side in research, I
 2 believe he then -- all responsibilities got moved
 3 over to him which he was in for a big surprise
 4 because I did a lot there.
 5 Q. And you read his deposition in
 6 preparation --
 7 A. I did.
 8 Q. -- to testify today?
 9 A. Yes. Sorry about that.
 10 Q. No problem.
 11 Based on reviewing his deposition, do you
 12 have an understanding of whether his
 13 responsibilities are the same as the ones you had
 14 or whether they differ in any important way?
 15 A. I don't -- I believe they differ. Key
 16 difference is he's more legislation or litigation.
 17 I tried not to, you know, delve into that because
 18 they had that department.
 19 And I did more of the conservation and
 20 participation. I worked with the state wild life
 21 agencies on that R3. And I don't know who handles
 22 that now, if anybody.
 23 Q. And it sounds like that aligns more with
 24 your interests as well?

Page 29

1 A. You got it.
 2 Q. When you say Salam Fatohi is more focused
 3 on legislation, can you explain that?
 4 MR. LOTHSON: And I'll object to the form of
 5 the question. Salam's testimony speaks for itself.
 6 Jim, you can answer if you know.
 7 THE WITNESS: Sure. We had different
 8 departments within NSSF, a media department, a
 9 government relations department and a member
 10 services. I was part of the member services with
 11 the research we did, and he was part of the
 12 government relations with the research he did.
 13 BY MR. HAZINSKI:
 14 Q. From your understanding just based on what
 15 you reviewed, it struck you that that legislation
 16 or litigation aspect was more relevant to his work
 17 than it was to your work?
 18 A. Correct.
 19 Q. We mentioned earlier your role as a
 20 witness in a number of lawsuits.
 21 Do you recall that?
 22 A. Correct.
 23 Q. Were those lawsuits all cases involving
 24 challenges to regulations of firearms or magazines?

Page 30

1 A. I believe so, yes. Main topics of, you
 2 know, AR platform, modern supporting rifles or
 3 capacity of magazines.
 4 Q. Based on what you remember about those
 5 cases, do you know whether the reliability or
 6 accuracy of any of the research that you conducted
 7 was a contested issue in those cases?
 8 A. The opposing lawyers certainly asked a lot
 9 of questions about how that research was done, but
 10 we were very confident in providing the best
 11 available information to our membership at the
 12 time.
 13 Q. Do you recall which pieces of your
 14 research were at issue?
 15 A. I believe everything that we submitted,
 16 you know, they had questions on primarily, you
 17 know, our modern sporting rifle consumer study and
 18 the magazine chart. And I believe several
 19 doc -- or reports were included. One that comes to
 20 mind I believe was the annual consumer -- annual
 21 retailer survey as well.
 22 Q. Did anything that you learned or were
 23 shown in those cases when you were a witness change
 24 your own view about the reliability or accuracy of

Page 31

1 any research you had conducted?
 2 A. I was very comfortable with how I had
 3 always conducted research. You know, I felt like I
 4 was supporting our membership, and the last thing I
 5 wanted to do was provide them with misinformation.
 6 They make a business decision that doesn't
 7 turn out well, and they're gonna be mad at me,
 8 right? So I want to make sure that whatever I put
 9 out was to the highest standard that I could.
 10 Q. Do you know whether any courts have found
 11 that any research you helped conduct at NSSF was
 12 unreliable?
 13 A. I don't recall. You know, I recall with
 14 the six or seven different cases that some court
 15 cases moved forward and some didn't, but I don't
 16 know if it was due to my research.
 17 Q. Would it be a fair summary of your
 18 testimony to say that your role as a witness in
 19 these cases didn't do anything to kind of undermine
 20 your confidence in the work that you had done?
 21 A. Correct, yeah. Like I said, I was
 22 confident in what I did. And certainly, you know,
 23 there were a lot of questions that came that made
 24 me realize that I wanted to even put out a better

Page 32

1 product so there would be less questions, you know,
 2 not only from -- you know, mainly from our members,
 3 right? We don't want them to question anything
 4 that we're putting out.
 5 So I already had a high standard. I just
 6 made sure to keep that and maybe even get it better
 7 if possible.
 8 Q. Can you give me an example of any areas
 9 where you saw room to do a better version?
 10 A. I recall a specific example in a report I
 11 had, and I don't remember the report that was an
 12 exhibit, but on one page -- and I'm making up the
 13 number. It was like 17.1000, and on another page
 14 it just said 17,000. And the opposing lawyer's
 15 like what's the difference. I must have rounded
 16 down. So like it wasn't major, but it was still
 17 something that I could improve upon moving forward.
 18 Q. Any other examples of issues like that
 19 come to mind?
 20 A. No. That's the one that stands out, yeah.
 21 Q. So I want to ask some terminology
 22 questions to make sure we're on the same page
 23 before we go forward. And to the extent possible,
 24 I'd like you to answer based on your understanding

Page 33

1 during the time that you worked at NSSF, not based
 2 on your understanding now if it happens to be
 3 different.
 4 Does that make sense?
 5 A. Sure.
 6 Q. And to the extent that your understanding
 7 of any terms changed or evolved while you were at
 8 NSSF, please tell me that, okay?
 9 A. Okay.
 10 Q. Do you have an understanding of the
 11 definition of a pistol versus a handgun?
 12 A. So thinking back, you know, at NSSF when I
 13 originally started, which I believe you wanted me
 14 to do, there's a report that the ATF put out on
 15 annual firearm production in the U.S., and in that
 16 it had, I believe, a heading pistols, and under
 17 pistols, you know, there's two types of
 18 hand -- like a semi-automatic handgun and a
 19 revolver.
 20 So I believe both of those would be
 21 considered pistols, but there's -- you know, under
 22 the category pistol you could have handgun or a
 23 revolver.
 24 Q. And those data also differentiated between

Page 34

1 pistols and rifles, correct?
 2 A. That -- yeah, the ATF, what we'll call
 3 AFMER, A-F-M-E-R, it had information on pistols and
 4 long guns, but long guns broken down between rifles
 5 and shotguns.
 6 Q. Okay. As you understand the terms, are
 7 there any pistols that are also rifles?
 8 A. When I originally started, no.
 9 Q. Did that change while you worked there?
 10 A. Correct, yeah. So you said, you know, to
 11 try to remember or recall when I was at NSSF, but
 12 now, you know, as markets evolve and consumer
 13 demands evolve and new products come out, I believe
 14 there is a category of a handgun that looks more
 15 like a longer gun, but I am not familiar with that
 16 category at all.
 17 Q. Would it be fair to say that that category
 18 wasn't something you were aware of or thinking
 19 about while you were still at NSSF?
 20 A. Correct. It seemed to evolve toward the
 21 end of my career there.
 22 Q. In general, what does the term modern
 23 sporting rifle mean?
 24 A. Modern sporting rifle at NSSF defined it

Page 35

1 as a semi-automatic rifle capable of the -- holding
 2 a detachable magazine. And it would fire one round
 3 with every pull of the trigger and particularly --
 4 or specifically AR and AK platform.
 5 Q. Baseline definition would be a
 6 semi-automatic rifle with detachable magazine and
 7 specifically focused on AR and AK platform rifles?
 8 A. And one pull of the trigger equals one
 9 round fired.
 10 Q. And that would be -- my understanding is
 11 that's typical of a semi-automatic firearm, right?
 12 A. Correct, whether traditional which is not,
 13 you know, a semi-automatic -- or not a modern
 14 sporting rifle or the modern sporting rifle.
 15 Semi-automatic rifle is both traditional and modern
 16 sporting rifle.
 17 Q. Did the term modern sporting rifle
 18 encompass any rifles that were not on the AR or
 19 AK platforms?
 20 A. When I was originally with NSSF that was
 21 our primary definition.
 22 Q. Did the term modern sporting rifle include
 23 any pistols?
 24 A. Not when I originally started at NSSF.

Page 36

1 Q. At the time you finished working at NSSF
 2 did it include any pistols?
 3 A. I'm trying to remember, you know, when
 4 they kind of became prevalent, and it wasn't
 5 anything I focused on. I would imagine some
 6 other -- maybe internally there might have been
 7 some discussion about it, but not under, you know,
 8 my responsibilities.
 9 Q. For the purposes of your own work did you
 10 ever count pistols within the category of modern
 11 sporting rifle?
 12 A. I did not.
 13 Q. For the purposes of your own work did you
 14 ever count -- strike that.
 15 For the purposes of your own work at NSSF
 16 did you ever count any shotguns as part of the
 17 category modern sporting rifles?
 18 A. I did not. You know, there's -- again,
 19 some manufacturers may have had small production
 20 numbers that I didn't go out of my way looking for
 21 them to include in that, not the handguns or the
 22 shotguns.
 23 But they started to become you know, more
 24 available later, you know, in my career at NSSF,

Page 37

1 but I didn't go out of my way looking to form a
 2 list of them. We just focused primarily on AR and
 3 AK rifles.
 4 Q. Are you familiar with types of rifles that
 5 are chambered for 50 caliber BMG ammunition?
 6 A. Most of that came from reading Salam's
 7 deposition, and it confused me.
 8 Q. Fair enough. I can relate.
 9 Did the your definition of modern sporting
 10 rifles that you used in your work at NSSF include
 11 any rifles chambered for 50 caliber BMG ammunition
 12 as far as you know?
 13 A. Not as far as I know.
 14 Q. When did you first hear the term modern
 15 sporting rifle?
 16 A. When I started in 2009 it was already
 17 being used by NSSF.
 18 Q. Through your work at NSSF did you have any
 19 understanding of where that term originated?
 20 A. I believe it originated within NSSF.
 21 Q. Through your work at NSSF did you develop
 22 any understanding of why NSSF developed that term?
 23 A. I think there was a lot of definitions or
 24 people calling it different things, so they wanted

Page 38

1 to have a common term for it. So they came up with
 2 modern sporting rifle. And again that encompassed
 3 AR and AKs, and I don't know if it's expanded since
 4 then.
 5 (Reporter requests a break.)
 6 MR. HAZINSKI: Of course. Let's take a break.
 7 (WHEREUPON, a short recess was
 8 taken.)
 9 MR. HAZINSKI: We're back on the record. It is
 10 10:55 by my watch. I would like to show you an
 11 exhibit. I have copies for those in the room. And
 12 for the record it's with the Bates range NSSF 17
 13 through 34.
 14 (WHEREUPON, Curcuruto Deposition
 15 Exhibit No. 1 was marked for
 16 identification.)
 17 BY MR. HAZINSKI:
 18 Q. Mr. Curcuruto, have you seen this
 19 document?
 20 A. Let me take a quick look through it. I
 21 don't know if I've seen this exact document.
 22 Q. Take as much time as you need to review
 23 it.
 24 MR. LOTHSON: We may be here for 20 minutes.

Page 39

1 THE WITNESS: Okay. It looks familiar. I
 2 don't know if it's an exact report I worked on, but
 3 I worked on several iterations of a similar report.
 4 BY MR. HAZINSKI:
 5 Q. Have you had a chance to look through
 6 every page of it?
 7 A. Briefly, yes.
 8 Q. What type of report is this?
 9 A. We call this an Industry Intelligent
 10 Report, and this one's titled Firearm Production in
 11 the U.S. With Firearm Import and Export Data.
 12 Q. Is this report of the type that NSSF
 13 regularly published while you worked there?
 14 A. One of many. We had several IIRs,
 15 Industry Intelligence Reports, on several different
 16 topics. We had one on hunting licenses and how
 17 much it costs to hunt in each state. One on
 18 sporting clays and clay sports. One on safety,
 19 national safety statistics. So we had at least
 20 five or six IIRs, different topics.
 21 Q. In your role at NSSF were you responsible
 22 for overseeing the creation of IIRs?
 23 A. Yes.
 24 Q. And who else was involved in that process?

Page 40

1 A. Myself did most of the heavy lifting, our
 2 research associate Dianne Vrablic. And then we
 3 worked with our immediate team, particularly
 4 graphics, to make the numbers look as pretty as
 5 possible, and then also the media team to
 6 communicate the results to our members.
 7 Q. Do you have any reason to believe that you
 8 were not involved in helping create this version of
 9 this report?
 10 A. It's been four years, you know, since I've
 11 looked at a report like this. So it looks very
 12 familiar, but there's a chance it's not one I
 13 worked on. But it does look like one I worked on.
 14 Q. Can you explain why you think there's a
 15 chance you might not have worked on it?
 16 A. Well, there's -- let's see. I don't
 17 know -- 18, 19 pages and hundreds of numbers in
 18 here. So I don't remember them all.
 19 Q. Well, I'll start asking some more specific
 20 questions and maybe drill down.
 21 Could you turn to Page 7 of the report
 22 which has the stamp NSSF 23?
 23 A. Got it.
 24 Q. I'd like to direct your attention to the

Page 41

1 top half of the page under the heading Modern
 2 Sporting Rifle Production Plus Imports Less
 3 Exports, 1990 through 2018.
 4 Do you see that?
 5 A. Yes.
 6 Q. So this chart has information up through
 7 data year 2018, correct?
 8 A. Correct.
 9 Q. And that was within the period of time
 10 that you were still at NSSF overseeing the creation
 11 of these reports, right?
 12 A. Correct, yeah.
 13 Q. So it makes sense if you were the one who
 14 was responsible for assembling this data and
 15 putting it in the report, right?
 16 A. There's a good chance.
 17 Q. Is there anybody else at NSSF who would
 18 have done that instead of you?
 19 A. Potentially Salam or Dianne after I left
 20 if they had used the same data. I'm not sure what
 21 the update schedule would have been on this report.
 22 We had so many reports that not all of them got
 23 updated on an annual basis.
 24 Q. Do you recognize this chart?

Page 42

1 A. I do.
 2 Q. What does it show?
 3 A. This is a chart that shows between 1990
 4 and 2018 on an annual basis the number of U.S.
 5 produced modern sporting rifles minus exports, as
 6 well as U.S. imported modern sporting rifles less
 7 exports.
 8 Q. Were you involved in creating this chart?
 9 A. I was or one like it. Again, all
 10 questions pertaining to this report, you know, have
 11 that caveat that may have been done by somebody
 12 else.
 13 Q. Could you briefly flip to the very last
 14 page which is stamped NSSF 34?
 15 A. Okay.
 16 Q. Do you see the copyright mark at the
 17 bottom that says copyright 2020 National Sports
 18 Shooting Foundation, Inc.?
 19 A. Correct.
 20 Q. Does that indicate to you that the report
 21 was prepared in 2020?
 22 A. There's a good chance unless it wasn't
 23 updated which would slip by potentially on occasion
 24 that we didn't update the copyright.

Page 43

1 Q. And you were with NSSF until 2021,
 2 correct?
 3 A. January of 2021, correct.
 4 Q. So if this was issued in 2020, it would
 5 have been under your oversight; is that fair?
 6 A. Yes. If this report was, it would have
 7 been under my oversight.
 8 Q. Okay. I'll ask you now to turn back, if
 9 you're not already there, to NSSF 23, and the chart
 10 on the top half of the page.
 11 Are you familiar with the underlying data
 12 sources and methodologies that NSSF used to create
 13 these types of charts?
 14 A. Yes. I was the originator of that.
 15 Q. Okay. The heading on this page uses the
 16 phrase modern sporting rifle, correct?
 17 A. Yes.
 18 Q. As used here does that term have the same
 19 meaning you described earlier in your testimony?
 20 A. Correct.
 21 Q. So to summarize, as used here, the term
 22 modern sporting rifle would exclude all pistols and
 23 shotguns, for example?
 24 A. The vast majority of them. Like I said,

Page 44

1 maybe one had slipped in there, I did not look for
 2 them, but a manufacturer that made modern sporting
 3 rifles. And I checked their website. I didn't see
 4 any AR pistols or shotgun MSRs. Not saying that a
 5 small number didn't slip in here, but if it did it
 6 would be very, very small.
 7 Q. Do you see at the bottom of the page where
 8 it says, source ATF AFMER, U.S. ITC, industry
 9 estimates?
 10 A. Yes.
 11 Q. Can you explain what that means?
 12 A. Sure. We like to, you know, provide as
 13 many sources throughout our documents as possible
 14 so if a member is reading those they know where
 15 that information came from.
 16 The first source ATF AFMER stands for the
 17 Alcohol Tobacco -- Bureau of Alcohol Tobacco
 18 Firearms, Annual Firearm Manufacturing and Export
 19 Report.
 20 The second source for information on this
 21 page was the United States International Trade
 22 Commission listed as U.S. ITC.
 23 And the third is industry estimates, and
 24 that's kind of my knowledge as well as -- at the

Page 45

1 time of creating this my president was Steve
 2 Sanetti at the time when I first created this. And
 3 I picked his brain on helping start the original
 4 graph or original chart.
 5 Q. Does this language -- it says source, and
 6 it identifies those sources.
 7 Does that correspond to both of the charts
 8 that appear on this page or just to one of them?
 9 A. I believe to both. I'm not a hundred
 10 percent confident at this time. It's been several
 11 years as I stated.
 12 Q. Were you the person with the
 13 responsibility of identifying those sources for the
 14 purposes of this report?
 15 A. For both charts on the page or --
 16 Q. Well, let me phrase it differently.
 17 A. Sure.
 18 Q. In terms of literally just typing out what
 19 are the sources for that information, was that your
 20 responsibility or someone else's?
 21 A. Primarily would have been my
 22 responsibility.
 23 Q. Okay. Can you explain more what is meant
 24 by the phrase industry estimates?

Page 46

1 A. Sure. That kind of covers my knowledge of
 2 the industry as well as -- I mentioned Steve
 3 Sanetti. He had a lot of knowledge, too, and he
 4 was somebody that I, you know, looked up to as very
 5 knowledgeable in the industry. And when I had some
 6 questions he was one of my go-to guys, and in
 7 particular for developing these type of charts I
 8 would ask him about them.

9 Q. Does the phrase industry estimates as used
 10 here refer to anything other than consultation you
 11 had with Steve Sanetti?

12 A. Sure. And estimates -- I think even on
 13 the top, I mean, you can see these are all rounded
 14 numbers. So, you know, they're estimates. They're
 15 not exact to the number. So the charts -- it's
 16 pretty easy to see that they're estimated charts.

17 Again, you know, this is new data that the
 18 industry never had. We were asked, you know, for
 19 it from our members. We wanted to provide them
 20 something that was useful to them that, you know,
 21 we could believe was gonna be something, if they
 22 spent money and made a decision on it, that we'd be
 23 confident that, you know, they can rely on this
 24 data to make those decisions.

Page 47

1 There's been other times when I've been
 2 asked to find the answer to something. We didn't
 3 have it. So we didn't just make it up so they
 4 could, you know, answer somebody's question. And
 5 if we put something out that was wrong and they
 6 made a bad decision, they wouldn't have been happy
 7 with their trade association.

8 Q. Do you recall which members asked for NSSF
 9 to compile this information?

10 A. Mostly manufacturers that made modern
 11 sporting rifles.

12 Q. Do you have an understanding of why those
 13 manufacturers wanted this information?

14 A. It wasn't available elsewhere, so
 15 they -- my assumption is they wanted it for market
 16 share purposes. If they knew what they -- you
 17 know, what they produced and they knew the overall
 18 number on an annual basis, they could understand
 19 market share, and then over time they could trend
 20 analysis to see if they're gaining or losing market
 21 share. My assumption, but makes sense.

22 Q. Could you generally describe the
 23 methodology that was used to create this chart by
 24 walking through the steps that were used to create

Page 48

1 it?

2 A. Sure. Sure. So we had some what we
 3 consider very reliable sources in the AFMER data
 4 and the ITC data. So I would go back and get all
 5 the AFMER reports go through them line by line.
 6 Every U.S. manufacturer is required to report
 7 firearms as required to report their
 8 U.S. production numbers.

9 And as we mentioned earlier, there's
 10 different categories, handgun, you know, revolver,
 11 rifle, shotgun, miscellaneous. There's five main
 12 categories. There may be some others I'm
 13 forgetting.

14 So I would go through there and, you know,
 15 identify just from personal knowledge which ones
 16 made a modern sporting rifle, or I considered to
 17 make a modern sporting rifle, and then
 18 painstakingly, you know, fact check each one.

19 If there were ones that I had questions
 20 on, you know, go to their website or contact
 21 somebody to see if they would be a company that I
 22 would add to this list. And I had a list of --
 23 again, it's been a while since I think I first
 24 created this, you know, at least ten years ago. So

Page 49

1 I'm thinking there was about somewhere between
 2 30-plus companies, you know, that produced modern
 3 sporting rifles at the time.

4 So I have that list in an Excel document.
 5 And then we would say, okay, from the AFMER data
 6 here's the production numbers from the U.S. That's
 7 how we got one column. Then we do the same thing
 8 with the U.S. ITC data which was more import
 9 related. And they had a really solid query system
 10 that you could just go in, plug in different codes
 11 and pull up rifles imported and then apply a
 12 percentage of that to the third column here,
 13 U.S. imports less exports.

14 Q. Does the AFMER data that you relied on to
 15 prepare this chart separate out the production of
 16 modern sporting rifles specifically?

17 A. The AFMER data did not. There's one
 18 column for rifles. So I had to make the
 19 determination. You know, Rock River Arms, for
 20 example, is a company that produced only modern
 21 sporting rifles. And that was the case for the
 22 vast majority of U.S. manufacturers listed in that
 23 AFMER.

24 There's a handful of companies that

Page 50

1 produce both traditional rifles as well as modern
 2 sporting rifles. And that's where I would -- with
 3 personal contacts I would call up a company, for
 4 example, Remington, that made, you know, your
 5 traditional Bolt-X rifle and your R15 which was a
 6 modern sporting rifle, but that number was lumped
 7 together as one.

8 So I'd call them up and say, hey, you
 9 know, I'm doing this, you know, on an aggregated
 10 basis. It'll be confidential. I just -- you're
 11 listed as, I'm making the number up, a million
 12 rifles produced. About how many of them are
 13 AR versus -- or MSR versus traditional. And then I
 14 would put those numbers in. We didn't want to
 15 over count anything.

16 Q. So you had to contact each manufacturer to
 17 request that they would give you an estimate of how
 18 many modern sporting rifles were being produced, is
 19 that --

20 MR. LOTHSON: Objection, form, misstates his
 21 testimony.

22 BY MR. HAZINSKI:

23 Q. Well, help me understand.
 24 So were you individually -- you were

Page 51

1 individually contacting each manufacturer as part
 2 of the process for creating this chart, right?

3 A. Not each one, but out of that list of
 4 approximately 30 there was a handful, maybe 4 or 5,
 5 that I would call up individually with a question
 6 and ask them for more specifics.

7 Q. Okay. And why only contact four or five?

8 A. Because those were the companies that made
 9 both traditional rifles and modern sporting rifles.

10 Q. Could you give me an example of one of
 11 those companies?

12 A. Sure. Remington.

13 Q. You mentioned it.

14 A. No problem.

15 Q. Thank you.

16 So the remaining manufacturers whose data
 17 you considered in creating this chart all
 18 exclusively manufactured modern sporting rifles
 19 among the rifles that they manufactured?

20 A. So according to my analysis going through
 21 each line -- again, Rock River Arms, I knew with
 22 personal knowledge they were, you know, focused on
 23 modern sporting rifles. So if their number was
 24 10,000, I'd put 10,000 in there.

Page 52

1 And then I would look if I didn't know a
 2 company -- and, you know, with 30 companies I knew
 3 most of them, but if there was a company I wasn't
 4 sure of, I would just go to their website and check
 5 their product line. And if it was a hundred
 6 percent AR15s or -- you know, I would put it under
 7 that modern sporting rifle category.

8 Q. So for -- would it be a fair description
 9 to say that for approximately 25 of the
 10 approximately 30 manufacturers whose manufacturing
 11 data contributed to this chart, the only types of
 12 rifles they manufactured based on your review were
 13 modern sporting rifles?

14 MR. LOTHSON: Objection, form, compound,
 15 somewhat confusing, a lot going on there,
 16 incomplete hypothetical.

17 BY MR. HAZINSKI:

18 Q. Please.

19 A. Okay. So -- and I'll answer in a way --
 20 you can tell me if I'm answering correctly, but I
 21 believe you were asking if about 25 of the 30 only
 22 made modern sporting rifles. You know, it's been a
 23 lots of years.
 24 So ballpark, the majority of them I didn't

Page 53

1 have to do further analysis, just my personal
 2 knowledge I knew. The ones that I didn't know, and
 3 I'm not sure exactly what percentage that was, I'd
 4 do further analysis on.

5 Q. This is a hypothetical. Hopefully it'll
 6 be a complete one.

7 If you were looking at a particular
 8 manufacturer's rifles they offered for sale, and a
 9 vast majority of them you determined were modern
 10 sporting rifles, and a small number were
 11 not -- were rifles other than modern sporting
 12 rifles, would it be your practice to always contact
 13 that manufacturer for further information?

14 A. Yeah, hypothetically or not hypothetically
 15 that was my practice. Yeah, if I had a question, I
 16 wasn't guessing. You know, I would call for more
 17 information. Or if I couldn't find more
 18 information, you know, I would more than likely
 19 just leave them off of that report for a given
 20 year.

21 Because, you know, over time there could
 22 have been instances one year I called somebody,
 23 next year I didn't, that type of thing. You know,
 24 I got in touch with somebody. The following year I

Page 54

1 didn't.
 2 Q. I apologize if you already answered this
 3 and I missed it.
 4 You said there's a list of approximately
 5 30 companies whose manufacturing data contributed
 6 to this chart. How did you settle on that
 7 particular list of 30 companies?
 8 A. Sure. So the AFMER data has every U.S.
 9 manufacturer. I'm guessing it's over a hundred.
 10 And, you know, I would just look through that one
 11 line at a time and check them off, you know,
 12 whether, okay, they don't produce MSRs or they do
 13 produce MSRs. Unsure, do further analysis on it,
 14 and then fill in the holes there that way.
 15 I got a little off track. Is that what
 16 you were looking for?
 17 Q. Well, there were more than 30 companies
 18 listed in total, correct?
 19 A. Correct.
 20 Q. So what was your process for paring that
 21 down to a list of about 30?
 22 A. Right. So, again, going through that
 23 AFMER data line by line, I would just analyze each
 24 company. If they didn't produce any modern

Page 55

1 sporting rifles, cross them off. If they did, look
 2 at that number, confirm that out of that number all
 3 or a percentage of those were modern sporting
 4 rifles. And when I was confident I had the correct
 5 number, I would plug it into that Excel spreadsheet
 6 for the aggregated data.
 7 Q. The figure in the charts that's on the
 8 bottom right that says 19,797,000, what does that
 9 number reflect?
 10 A. That should be the total of all U.S.
 11 produced and imported modern sporting rifles less
 12 exports from 1990 through 2018.
 13 Q. Does this -- does that number correspond
 14 to NSSF's estimate of how many modern sporting
 15 rifles were owned in the United States?
 16 A. Well, this particular number is a
 17 production number. I don't know what NSSF's
 18 current number of MSRs are.
 19 Q. But at the time it was issued was it
 20 NSSF's estimate of the number of MSRs owned in the
 21 U.S.?
 22 A. It was an estimate. This particular --
 23 that 19 million 797 million was the number of MSRs
 24 produced or imported within that time period.

Page 56

1 Q. You can't tell from this data, for
 2 example, whether any of these modern sporting
 3 rifles were owned outside of the U.S., for example?
 4 A. You know, when I created the report, the
 5 assumption was a vast majority of them were for the
 6 U.S. civilian market.
 7 Thinking now hypothetically could somebody
 8 have bought one in the U.S. and transferred it out
 9 of state or out of the country, I don't know. I'm
 10 not -- I don't know the rules and regulations of
 11 what you can and can't do.
 12 Q. And you said for the civilian market.
 13 Did your data disaggregate ownership by
 14 civilians versus ownership, for example, by law
 15 enforcement organizations?
 16 A. I believe, you know, the AFMER data when a
 17 company -- a U.S. manufacturer would produce that,
 18 it was strictly for -- it wasn't for military
 19 purposes. So civilian or law enforcement and a law
 20 enforcement officer could use that firearm for both
 21 job and for personal use or the same firearm.
 22 Q. So to be clear. Your understanding is
 23 that the AFMER data did not reflect any
 24 manufacturing for military use, but it would

Page 57

1 encompass manufacturing for use, for example, by
 2 police departments or sheriff's offices or similar
 3 law enforcement agencies?
 4 A. Correct, yeah. We knew that, you know,
 5 out of that 19,700,000 estimate that those were not
 6 used for military purposes. Right.
 7 Q. Do you have any way of estimating out of
 8 this approximately 20 million number what
 9 proportion of those belonged to law enforcement
 10 agencies?
 11 A. As I'm sitting here now, obviously I'm
 12 gonna have to go off recollection because it's been
 13 four, five years, but we would have several
 14 different points of data, right?
 15 And what you could do to get an estimate
 16 of something like that, we'd take this 19.7
 17 million, go to another data source, for example,
 18 that modern sporting rifle consumer study where we
 19 asked a series of questions to owners of modern
 20 sporting rifles. And one of those questions I
 21 believe had to do with are you law enforcement as
 22 well.
 23 So I'm sure we could apply a percentage to
 24 find out how many people that own these are law

Page 58

1 enforcement. And then, again, the assumption is
 2 that law enforcement can own that firearm for as
 3 strictly law enforcement purposes or can they use
 4 that firearm for civilian purposes as well. I
 5 don't think we ever delved into that detail.
 6 Q. As far as you know, did NSSF ever do that
 7 analysis to determine the proportion of the total
 8 MSR figure that is owned by law enforcement?
 9 A. I don't recall. It might have been
 10 something somebody asked, and just because it came
 11 to mind that modern sporting rifle one, it could
 12 have been a simple formula, 19.7 million times
 13 whatever that number was, here's a ballpark. But,
 14 you know, it was something that -- it wasn't any
 15 detailed analysis or a special report that I
 16 recall.
 17 Q. I want to direct you now to the magazine
 18 chart on the bottom of this page. Are you
 19 generally familiar with this chart?
 20 A. Yes. It's a report that I originally
 21 created as well.
 22 Q. What does it show?
 23 A. So the title of it, NSSF Magazine Chart
 24 estimated 304 million detachable pistol and rifle

Page 59

1 magazines in U.S. consumer possession 1990 through
 2 2018. So it's got really five bar charts that make
 3 up a total number.
 4 So there's two charts for pistol magazines
 5 that one is for 10 rounds or less. The other
 6 pistol magazines that hold 11 or more rounds. And
 7 then there's three charts for magazine rifles
 8 broken down by 10 or less, 11 to 29, and 30 plus.
 9 And then the last is just a total of all five of
 10 them.
 11 Q. In general terms what was the methodology
 12 you used to create this chart?
 13 A. Again, this was something that was asked
 14 from our members, how many magazines are out there.
 15 Never been done before. There wasn't -- we didn't
 16 have sales data, you know, very specific sales data
 17 like they do in other industries, apparel or
 18 grocery stores, where you can find out how many
 19 cans of peas were sold yesterday, right? And have
 20 an exact number.
 21 We didn't have a retail sales platform for
 22 the outdoor industry. So the best way we could do
 23 this was to use similar data like the production
 24 charts from the AFMER and the U.S. ITC.

Page 60

1 And again I'd talk to Steve Sanetti about,
 2 you know, what are good breakdowns for these, and
 3 we came up with those five different categories.
 4 And then we applied whatever data we had on hand
 5 that we felt was the most reliable, a number, and
 6 calculated them out, and then felt comfortable
 7 enough to provide it to our members as, you know, a
 8 starting point for people to have an understanding
 9 of what the size of the magazine market was like.
 10 Q. Similar to my question about the chart on
 11 the top of the page, were you able to estimate what
 12 proportion of the magazines produced or owned by
 13 law enforcement agencies as opposed to civilians?
 14 A. No. It wasn't something that we were
 15 asked about I don't think on enough basis to break
 16 that out.
 17 But, again, going back to how I described
 18 how I would now look at doing that, I would say,
 19 okay, whatever the case was, 304 million, it would
 20 be different than what I described before because
 21 that was specific to modern sporting rifles where
 22 this is now all encompassing of every firearm that
 23 is able to accept a detachable magazine. And that
 24 includes your Ruger 10/22s.

Page 61

1 Now, does a law enforcement own a
 2 Ruger 10/22, I can guarantee they do. But, you
 3 know, they're using them to hunt squirrels or shoot
 4 tin cans with, right?
 5 So I don't know how I would go about
 6 figuring that out at this point.
 7 Q. Having discussed the data on this page
 8 with me today and spent some time with it, do you
 9 have any specific reason to believe that someone
 10 other than you oversaw or was responsible for
 11 putting together this part of the report?
 12 A. No. This was, you know, a
 13 report that -- or this magazine chart was
 14 something, you know, myself was a lead on, and
 15 folks like Steve Sanetti helped. And again, you
 16 know, with that caveat that I'm not sure if this
 17 report was a hundred percent me, but it looks very
 18 much like a report that I had created, yeah.
 19 MR. HAZINSKI: I want to show you the next
 20 exhibit which will be Number 2.
 21 (WHEREUPON, Curcuruto Deposition
 22 Exhibit No. 2 was marked for
 23 identification.)
 24

Page 62

1 BY MR. HAZINSKI:
 2 Q. This resembles the document we just looked
 3 at in Exhibit 1.
 4 A. Okay.
 5 Q. Have you seen this one before?
 6 A. Give me a minute to just look through it.
 7 Q. Of course.
 8 A. Okay. So your question was have I seen
 9 this report before?
 10 Q. That's the question.
 11 A. The answer is I'm not sure because this
 12 was seemingly produced after my tenure at NSSF.
 13 However, I'm still a member of NSSF, and I have
 14 access to the research. And on occasion over the
 15 last four years I would go in and -- if I needed a
 16 question answered, I'd like through NSSF research.
 17 I don't know if I've ever seen this
 18 particular report before, though.
 19 Q. You didn't specifically review this
 20 document in preparation for your deposition today,
 21 correct?
 22 A. Correct.
 23 Q. Would it be fair to say that this is a
 24 2023 version of the Industry Intelligence Report we

Page 63

1 were just looking at?
 2 And I would direct you, if it's easier, to
 3 the title page where it says 2023 Edition.
 4 A. Yes, it does look like that. It looks
 5 like it's got at least three more years worth of
 6 data from the original document that we talked
 7 about earlier.
 8 Q. Did you participate in creating this
 9 updated version of this report?
 10 A. I don't believe so.
 11 Q. Do you --
 12 A. Since I left in January of '21, it looks
 13 like this report came out well after that.
 14 Q. So since you were not at NSSF, do you have
 15 any personal knowledge of the methodology used to
 16 create this specific version of the report?
 17 A. I do not.
 18 Q. The previous version of the report had a
 19 date of 2020. This has a date of 2023.
 20 Other than the Industry Intelligence
 21 Reports created in those years, did you work on any
 22 other versions of this Industry Intelligence
 23 Report?
 24 A. So prior to 2020?

Page 64

1 Q. Prior to 2020 or between 2020 and 2023.
 2 A. It would have been, if anything, prior to
 3 2020, not after 2020 because I left in January of
 4 2021. So prior to it I'm sure I had worked on
 5 other iterations of this firearm production in the
 6 U.S. report.
 7 Q. All right. Could you please turn to
 8 Page 7 of the 2023 version? And that will be at
 9 Bates stamp NSSF 41.
 10 A. Okay.
 11 Q. Do you recognize this chart as similar to
 12 the one we were looking at on Page 7 of the prior
 13 exhibit?
 14 A. It does look similar.
 15 Q. Different data years?
 16 A. Correct.
 17 Q. The sources at the bottom say, source
 18 ATF AFMER, U.S. ITC, industry reporting.
 19 Do you see that?
 20 A. I do.
 21 Q. Do you recall that in the previous version
 22 that was phrased as industry estimates?
 23 A. Yep. I actually have them both open, and
 24 that's -- yeah, industry reporting versus industry

Page 65

1 estimates.
 2 Q. Do you have any personal knowledge as to
 3 why that was changed in this version of the report?
 4 A. I hadn't prior to a couple -- yesterday
 5 when I read through the deposition of Salam. And I
 6 did notice that there was a line of questioning
 7 regarding the difference between reporting and
 8 estimates.
 9 Q. Do you believe the term that you used,
 10 industry estimates, was inaccurate?
 11 A. No.
 12 Q. The magazine chart is not present on this
 13 page either, right?
 14 A. Correct.
 15 Q. Do you have any personal knowledge about
 16 why it was not included in the 2023 version of the
 17 report?
 18 A. It being the magazine chart, I do not.
 19 Q. Do you personally know whether NSSF
 20 currently stands by your magazine estimates?
 21 A. I don't know personally if they stand by
 22 what I had originally developed, but I did see they
 23 came out with an updated report maybe about a month
 24 or so ago.

Page 66

1 MR. HAZINSKI: So we can set these two exhibits
 2 to the side for a moment. I'll hand out another.
 3 This will be Number 3.
 4 (WHEREUPON, Curcuruto Deposition
 5 Exhibit No. 3 was marked for
 6 identification.)
 7 BY MR. HAZINSKI:
 8 Q. For the record this is a printout of a
 9 document that was produced in an Excel format with
 10 the Bates stamp NSSF 2351, this printout including
 11 only the Columns A through AI of that spreadsheet.
 12 A. Okay.
 13 Q. Apologies, A through AF of the
 14 spreadsheet.
 15 Mr. Curcuruto, have you seen this
 16 spreadsheet or a version of this spreadsheet
 17 before?
 18 A. I don't believe I've seen this exact
 19 version the way you have it laid out in front of me
 20 with a lot of blanks in it, but it's similar to a
 21 document I originally created at NSSF probably
 22 ten years ago.
 23 Q. And what was the nature of that document
 24 that you created?

Page 67

1 A. This actually helped me develop that
 2 number for the amount of modern sporting rifles in
 3 the United States, and this is from the AFMER data
 4 primarily.
 5 Q. To prepare for your deposition today did
 6 you review that document or any version of that
 7 document?
 8 A. Such as this?
 9 Q. Such as this spreadsheet?
 10 A. I did not. Bringing back memories. I
 11 haven't seen it in a while.
 12 Q. And you were the person who created an
 13 earlier version of this document in the first
 14 instance?
 15 A. Yeah, created a one that looks a lot like
 16 this.
 17 Q. So I'll represent to you that this is data
 18 corresponding to the 2023 version of the report
 19 that we looked at in Exhibit 2.
 20 You testified that this sheet reflects
 21 information gathered from AFMER?
 22 A. Correct. Yeah, AFMER reports. That's
 23 what it looks like for me, yeah.
 24 Q. You mentioned it looked different because

Page 68

1 of blanks. What did you mean by that?
 2 A. For example, Column A is blank. So the
 3 one that I created, obviously I had more
 4 information in there so I knew what I was looking
 5 at.
 6 Q. What kind of information was in there?
 7 A. Column A to the best of my recollection
 8 would have been the name of the U.S. manufacturer.
 9 Q. Okay. And each row would correspond to a
 10 different manufacturer?
 11 A. Correct.
 12 Q. When you testified earlier about the AFMER
 13 data, we discussed at times communications you had
 14 with manufacturers to adjust the rifle production
 15 estimates because they don't correspond exactly to
 16 the modern sporting rifle category.
 17 Do you recall that?
 18 A. It may -- yeah, it was to get more
 19 specific response to have more accurate data to
 20 plug into a chart similar to this just specific to
 21 modern sporting rifles.
 22 Q. Because for some manufacturers if you just
 23 reported the AFMER data in the rifle category, that
 24 could result in an overcount of MSRs, right?

Page 69

1 A. Correct. Very good.
 2 Q. I'm learning.
 3 So I'll direct you to a specific cell,
 4 Column AB, Row 23. Let me know when you're there.
 5 A. I believe it says 108.
 6 Q. 108,000, right.
 7 A. Okay.
 8 Q. That 108,000 figure reflects your
 9 determination or -- strike that.
 10 The 108,000 number reflects that the
 11 manufacturer of Row 23 produced 108,000 modern
 12 sporting rifles for the year 2016, correct?
 13 A. What we considered modern sporting rifles
 14 through that AFMER data, it was either the rifle
 15 category or the miscellaneous category as well.
 16 Q. Okay. So I'd like you to turn to the
 17 fourth page of this document. They're not
 18 numbered.
 19 A. Okay.
 20 Q. But if you count -- apologies, not, to the
 21 fourth page, but to the seventh page. I apologize.
 22 A. I think I'm following you.
 23 Is it Cell AC 23?
 24 Q. It's AB 23. But it's at the very top of

Page 70

1 that page and maybe hidden under the staple in the
 2 document a little.
 3 A. Okay.
 4 Q. So if you pull back the document, you see
 5 where it says Cell AB 23?
 6 A. Correct.
 7 Q. So I'll represent to you that this list
 8 here corresponds to comments that were --
 9 A. Sure.
 10 Q. -- added to the Excel boxes.
 11 Do you recall whether you or your
 12 colleagues at NSSF used the comment function in
 13 Excel to record any information for this
 14 spreadsheet?
 15 A. Making me go back in time, but yeah. To
 16 the best of my recollection I would have utilized
 17 the comment section there.
 18 As you can see there's a lot of columns
 19 and a lot of rows. So, you know, my memory's okay,
 20 but it's not that good so I would utilize that
 21 comment section as I was filling out the report on
 22 occasion.
 23 Q. The comment corresponding to Cell AB 23,
 24 says Jim Curcuruto, which is you, right?

Page 71

1 A. Correct.
 2 Q. And it reads, 75 percent of total
 3 R -- MSR slash AK made in U.S., but not sure if all
 4 you are AK, need to contact.
 5 Did I read that right so far?
 6 A. Looks good.
 7 Q. Then it says, 90,000 rifles plus
 8 54,000 misc, M-I-S-C, equals 144,000. Going to use
 9 90K to be safe as no response from CO.
 10 Did I read that right?
 11 A. Correct.
 12 Q. And CO means company?
 13 A. The entire thing is cryptic, and
 14 apparently I wrote it. So I'm not sure. I would
 15 assume CO meant company.
 16 MR. LOTHSON: Where are we?
 17 MR. HAZINSKI: Very top line of the seventh
 18 page of the printout.
 19 BY MR. HAZINSKI:
 20 Q. The beginning of this comment refers to
 21 75 percent of the total.
 22 A. Okay.
 23 Q. Can you tell me what that refers to?
 24 A. I can't, unfortunately, specifically tell

Page 72

1 you what it refers to since it was so long ago, and
 2 there's just hundreds of, you know, I'm sure,
 3 comments along the way as I filled out this report
 4 on an annual basis. So I don't recall specifically
 5 what that would mean.
 6 Q. Do you have a general understanding of at
 7 the time you were working on preparing this
 8 spreadsheet what the 75 percent estimate might have
 9 been used for?
 10 A. Sure. So we talked a little bit earlier
 11 about out of that number of companies -- and I
 12 think I estimated 30 earlier which apparently is
 13 incorrect estimate because there looks to be a lot
 14 more than 30. So, again, my recollection of course
 15 is a little bit fuzzy. Sorry about that.
 16 But so there's several instances as I was
 17 creating this report on an annual basis where a
 18 company, whatever number, 108, you know, thousand
 19 that was listed in AFMER. And I would not know
 20 enough information about that company, so I'd go to
 21 their product. And if I was confident it was all
 22 MSRs, I would put that 108 in there.
 23 If it had a product mix that I wasn't sure
 24 of, I would then contact that company. If I got an

Page 73

1 answer from that company, fill it in, feel
 2 confident about it. If I didn't get an answer from
 3 them, this comment section was kind of a
 4 placeholder until I did.
 5 Q. Do you have an independent recollection as
 6 you sit here today of the of the source of the
 7 75 percent number that you noted for this cell?
 8 A. For this specific one, unfortunately, I do
 9 not.
 10 Q. Do you have a general understanding based
 11 on your recollection of your typical practice of
 12 where you would and how you would generate that
 13 70 -- a number like 75 percent for use in a context
 14 like this?
 15 A. Going back in time as I'm sitting here
 16 today, I'll give you my best thought process. So
 17 if I went to that website, and let's say they had
 18 ten products, and seven and a half of them -- seven
 19 of them were MSRs, I'd say, okay, in my thought
 20 process I'd think about 70 percent of these are
 21 modern sporting rifles.
 22 But if I wasn't convinced that that was
 23 the answer because maybe they had a hundred
 24 products, and I was like, let me call for more

Page 74

1 information. That probably was the case. It could
 2 have been.
 3 Q. The next part of the comment says
 4 90,000 rifles plus 54,000 misc.
 5 Do you see that?
 6 A. Correct.
 7 Q. And rifles and misc are categories that
 8 corresponded to AFMER data, right?
 9 A. Correct. I believe there's at least five
 10 categories -- columns, the handguns, the
 11 revolvers -- or the pistols, revolvers, the rifles,
 12 the shotguns, and then the misc -- and I believe it
 13 was M-I-S-C. It might have been spelled out,
 14 miscellaneous, but I think it was just M-I-S-C.
 15 And that stands for miscellaneous.
 16 So some companies, like a big company,
 17 could produce, you know, a handgun, a
 18 semi-automatic handgun. They could produce a
 19 rifle. They could produce a revolver, and they
 20 could produce a shotgun. So they're filling out
 21 all columns. Most companies aren't like that.
 22 They're specific to a product line.
 23 So when I would get into that situation
 24 where, well, this company produced rifles and

Page 75

1 miscellaneous category, that's where I would kind
 2 of make sure I was gonna put the correct number. I
 3 didn't want to overcount anything because then I'm
 4 not putting out the best product I could, you know.
 5 Q. Is it your understanding that the misc or
 6 miscellaneous category for AFMER corresponds to
 7 firearm frames and receivers?
 8 A. I believe that's the case for
 9 miscellaneous. And I don't know the specific
 10 definition, but I believe the bulk of items listed
 11 under that miscellaneous are stamped blowers which
 12 is basically, you know, the part that the ATF
 13 tracks. And that'll be the part that's made into
 14 the full firearm.
 15 But you don't need to stamp a barrel. You
 16 don't need to stamp the upper. You don't need to
 17 stamp the trigger. It's just that one piece.
 18 That's how ATF can then track how many firearms are
 19 produced in the U.S. through a report like this.
 20 Q. According to this comment 90,000 was added
 21 to 54,000 for a total 1414,000?
 22 A. Correct.
 23 Q. The next part of the comment reads, going
 24 to use 90K to be safe as no response from company.

Page 76

1 Can you explain what that means?
 2 A. You know, for my comment, again, not a
 3 hundred percent accurate, just to the best of my
 4 recollection, right? After reviewing that website
 5 and miscellaneous category and rifles produced, my
 6 best assumption was 90,000.
 7 Hadn't heard from the company as of yet,
 8 was still going to follow up. And that, you know,
 9 comment was a placeholder because I wouldn't have
 10 remembered. Who was I supposed to call? What was
 11 my thing? So this is just notes to myself, but as
 12 I'm looking at it now, a little confusing.
 13 Q. If the company had responded, based on
 14 your usual practice where would their response have
 15 been documented?
 16 A. 99 percent are phone calls. I did a lot
 17 of phone calls to -- John, looking at the AFMER
 18 data. I got these numbers. Can you tell me how
 19 many of the 54,000 miscellaneous were stamped
 20 blowers that were gonna be made into a final
 21 product, and can you tell me how many of the
 22 90,000 rifle categories are what we consider modern
 23 sporting rifles?
 24 And they would say, sure, I think,

Page 77

1 whatever, 108,000 of them. And then I plug in
 2 108,000.
 3 Q. And when you say plug it in -- scratch
 4 that.
 5 If you have a phone call with a
 6 manufacturer providing an estimate, do I understand
 7 you to be saying any estimates they gave you about
 8 MSR production would be recorded directly in this
 9 spreadsheet?
 10 A. Correct. So I think we were talking about
 11 this AB, 23B, 108,000. So after all the
 12 discussions I had, that would have been the best
 13 number to plug into that report.
 14 Q. Did you keep any separate records or
 15 documentations outside of this spreadsheet of MSR
 16 estimates that you received from manufacturers?
 17 A. No. This is pretty comprehensive. This
 18 was -- I spent a lot of time with this guy over the
 19 years, my friend.
 20 Q. I hope it's bringing back pleasant
 21 memories.
 22 A. I like numbers. It's weird, but I enjoy
 23 looking at Excel spreadsheets.
 24 Q. Would it be safe to say that if this

Page 78

1 company corresponding to Row 23 in the spreadsheet
 2 had given you an MSR estimate by responding to you,
 3 it would have been recorded in this spreadsheet?
 4 A. Correct, yeah. In that corresponding
 5 column, yeah.
 6 Q. So in the case of this cell, the company
 7 didn't respond, but you decided to include the data
 8 in the estimates anyway, right?
 9 MR. LOTHSON: Objection, misstates his
 10 testimony.
 11 THE WITNESS: Correct.
 12 MR. LOTHSON: Calls for speculation.
 13 THE WITNESS: Yeah, according to the comment,
 14 the company hadn't responded to that estimate that
 15 I thought was 90,000. It appears, again, now that
 16 I'm looking at it, that the company did respond and
 17 gave me the 108,000. So I wouldn't have just made
 18 up a number. If I did, it would have been the
 19 90,000 for everything.
 20 So I always err on the side of caution.
 21 So my estimation out of that 155,000 was 90,000.
 22 After I heard back from them, they gave me the 108.
 23 So I was close, but, you know, I'll always go low
 24 if I don't know.

Page 79

1 BY MR. HAZINSKI:
 2 Q. So you started with the 75 percent
 3 estimate that you generated by determining
 4 approximately how many of their firearms counted as
 5 MSRs, right?
 6 MR. LOTHSON: Objection, misstates his
 7 testimony, calls for speculation.
 8 THE WITNESS: Correct. Yeah, speculation or
 9 going back in time -- I think we discussed it, too,
 10 right? I would have looked at their website a lot
 11 of times. Identify I think about 75 percent of the
 12 product mix would be considered modern sporting
 13 rifle. Wait to hear from them. Hear from them.
 14 Plug it in. Didn't hear from them, make a comment.
 15 Did hear from them, fill it in. I didn't just pull
 16 numbers out of, you know, nowhere.
 17 BY MR. HAZINSKI:
 18 Q. And then as best as you understand based
 19 on your typical practice at the time, the 144,000
 20 total is the sum of numbers that you would have
 21 pulled from these AFMER categories directly from
 22 that company in that year?
 23 A. Correct.
 24 Q. But then 108,000 --

Page 80

1 A. I'm sorry. I'll caveat that. As
 2 they're -- 90,000 even and 54,000 even, they're
 3 estimates. They're not exact. If you look back at
 4 AFMER data, it was probably nothing that said 90 --
 5 it might have said 90,116, so estimates.
 6 Q. Rounded to the nearest thousands.
 7 And then the number that ultimately got
 8 recorded here in the original cell was 108,000,
 9 right?
 10 A. Yeah, I believe 23 AB, correct.
 11 Q. And that's 75 percent of 144,000, right?
 12 A. I don't know. Do you have a calculator?
 13 Q. I can ask you to trust me.
 14 A. Okay.
 15 Q. Cell AB 24, on the first page has a zero
 16 in it, and it's highlighted in yellow.
 17 Do you see that?
 18 A. I do.
 19 Q. Do you have any personal knowledge as to
 20 why there's yellow highlighting in that cell?
 21 A. I do not. You know, I highlighted a lot
 22 of different cells for a lot of different reasons.
 23 As you see, there were a lot of different comments,
 24 and since it was so long ago I couldn't tell you

Page 81

1 specifically what each highlight meant.
 2 Q. Was yellow highlighting a tool that you
 3 used in your own work with this spreadsheet?
 4 A. I believe -- I had access to this report
 5 as well as the research associate, Dianne. I'm
 6 kind of looking for a key right now of what color
 7 coding meant, but I don't see it on here.
 8 So most likely it would have been myself
 9 or Dianne that added comments or color-coded
 10 things. I even see we have different color ink,
 11 you know, reds and blacks.
 12 Q. As you sit here today do you have an
 13 understanding of what the yellow highlighting means
 14 or reflects?
 15 A. As I sit here today, unfortunately, I do
 16 not. As you can see, it was a pretty complex and
 17 intricate process. Well, maybe not complex, time
 18 consuming.
 19 So, again, with our end goal making sure
 20 we had a product that our members could make
 21 decisions off of, that's why you see all the notes
 22 and all the boxes and all the color coordination to
 23 make sure that we were doing everything we could to
 24 produce the best product that we could.

Page 82

1 Q. I'll ask you to turn back to the seventh
 2 page that we were just looking at a few moments ago
 3 to look at the comment corresponding to Cell AB 24.
 4 Let me know when you get there.
 5 A. AB 24, note, Jim Curcuruto, no website, no
 6 answer to call, 40,000.
 7 Q. And there's a phone number there, but we
 8 won't worry about that.
 9 Can you explain what this comment means?
 10 A. So this -- whatever the company was -- and
 11 I'm assuming going, back in time. It looks like
 12 potentially this company in the AFMER category,
 13 whether rifles or miscellaneous, had a number
 14 40,000. There was no website to confirm what that
 15 product was, and then nobody answered my call.
 16 So, again, to err on the side of caution,
 17 instead of plugging in 40,000, it looks like I just
 18 plugged in zero. Now, is there a chance that those
 19 were modern sporting rifles and I undercounted,
 20 sure. But, again, I'd rather undercount than
 21 overcount.
 22 Q. Would it be fair to say that based on your
 23 understanding of your usual practice at the time,
 24 the fact that they didn't have a website prevented

Page 83

1 you from estimating what proportion of that 40,000
 2 were modern sporting rifles?
 3 A. Correct. It was like -- as you can see,
 4 it was kind of like a puzzle. So I'm trying to
 5 fill in all the pieces to complete the puzzle, but
 6 if I -- if a piece was unavailable, you know, I
 7 just would kind of err on the side of caution and
 8 put the zero in.
 9 I don't think I -- I don't think there's
 10 AR ton of holes like that. I think it's a pretty
 11 comprehensive report or at least the most
 12 comprehensive report that's available out there
 13 using those sources that we had.
 14 Q. The absence of a website that would let
 15 you actually look at the different firearms
 16 prevented you from using that data.
 17 As far as you understand, is that why the
 18 number reported zero corresponding to the cell?
 19 MR. LOTHSON: I'll object to the form. I think
 20 it misstates his testimony. You talked about the
 21 phone number there. Are you -- I'm confused by
 22 your question.
 23 MR. HAZINSKI: Let me ask it another way.
 24

Page 84

1 BY MR. HAZINSKI:
 2 Q. So no data reported for this cell.
 3 There's no website. The absence of a website
 4 contributed to the fact that you weren't able to
 5 have any reportable data for that company for that
 6 year.
 7 Is that a fair summary?
 8 A. Yeah, so what I would do is -- there are
 9 at least three things I would look at. Personal
 10 knowledge, I know who Rock River is, right? I
 11 didn't know who this company was. Go to the
 12 website. Most of the time companies have a
 13 website. This one I couldn't find a website for.
 14 And then, you know, somehow it looks like I found a
 15 phone number, whether Google search or whatever the
 16 case may be, but nobody answered the phone.
 17 So three strikes and you're out. I mean,
 18 I can only do so much. I only have a limited
 19 amount of time. As you probably saw, we developed
 20 a lot of materials for our members. So, you know,
 21 as thorough as I want to be and fill in all those
 22 zeros, I couldn't get every single piece.
 23 Q. I think I understand.
 24 So if you can't look at product listings

Page 85

1 on a website and you don't get a response from
 2 them, then you're not in a position to make an
 3 estimate of the number of MSRs for that year?
 4 A. On top of it, I didn't know who that
 5 company was. For that particular company I would
 6 just err on the side of caution and put in the zero
 7 instead of the 40,000 or a different number.
 8 Q. Returning to the spreadsheet which will be
 9 on the second page, could you please look at
 10 Cell AB 69?
 11 A. Okay. 10,000 highlighted in yellow.
 12 Q. Yeah, another one in yellow highlighting.
 13 And the figure is 10,000, right?
 14 A. Correct.
 15 Q. Now I'd like to flip to the comment
 16 corresponding to that. I think it's on the ninth
 17 page of the document.
 18 Are you there?
 19 A. I believe so, AB 68?
 20 Q. 69.
 21 A. Oh, okay.
 22 Q. The comment for AB 69 says, Jim Curcuruto,
 23 colon, 13,340, but some bolt action.
 24 Do you see that?

Page 86

1 A. Correct.
 2 Q. Can you explain what that comment means?
 3 A. Sure. So again going back to not a
 4 hundred percent recollection, but the same process.
 5 Did I know who the company was? You know, go to
 6 their website.
 7 Looks like apparently in this case I went
 8 to their website, and they had more than one type
 9 of product there, bolt action and modern sporting
 10 rifles. And assuming that 13,400 -- 340 was the
 11 number that was in the AFMER category either -- oh,
 12 it doesn't state whether it was miscellaneous or
 13 rifle. I'm assuming it was rifle since it says
 14 bolt action on it.
 15 I would have wanted to apply a percentage
 16 from the website. It looks like 70 percent of them
 17 are modern sporting rifles. So either I would
 18 apply that number if I was very comfortable with
 19 that or call up the company and say, hey, 13,380,
 20 do you have a mix of products? How many of those
 21 are modern sporting rifles? Then I plug in an
 22 estimate. I believe you said it was 10,000 in this
 23 case.
 24 Q. Based on your usual practice at the time,

Page 87

1 do you have an understanding of how mathematically
 2 you would get from this 13,340 number to the
 3 specific number of 10,000 that's reported?
 4 MR. LOTHSON: Objection, form, asked and
 5 answered.
 6 THE WITNESS: So not mathematically, but most
 7 likely it was a phone call, and somebody returned
 8 that call. Out of that 13,000, about 10,000 are
 9 modern sporting rifles.
 10 It's very rarely did I not get one of
 11 those three. I either knew them, website was
 12 enough information or they got back to me with an
 13 estimate.
 14 BY MR. HAZINSKI:
 15 Q. Other comments on this spreadsheet are
 16 written by Dianne Vrablic, right?
 17 A. Yes.
 18 Q. Or Vrablic (pronunciation).
 19 A. Very good.
 20 Q. Thank you.
 21 A. Between Vrablic and Curcuruto you had to
 22 practice.
 23 Q. And I still made a mistake.
 24 And at the time that you were working on

Page 88

1 the spreadsheet she reported directly to you,
 2 correct?
 3 A. Correct.
 4 Q. And she collaborated with you to help
 5 prepare the overall MSR production estimates?
 6 A. Yeah, over the years she had some
 7 involvement. This, as you can see, is a long one.
 8 So I handled the vast majority of the number
 9 collection, and then she would make the report look
 10 pretty, right? With our graphics team and that
 11 sort of stuff.
 12 But on occasion I'd say, hey, I got ten I
 13 can't figure out. If she had the time, she would
 14 help me track down those answers. We were both
 15 puzzle makers.
 16 Q. As part of your work did you have to
 17 routinely discuss the data gathering process with
 18 her?
 19 A. For this particular --
 20 Q. For this particular project.
 21 A. -- project?
 22 It's pretty self-explanatory, right? So
 23 not routinely, not much to it.
 24 Q. Based on your work with her, did you have

Page 89

1 an understanding about whether the methods she was
 2 using were the same as the methods you were using
 3 or different ones?
 4 A. It's been so long. And, like I said, the
 5 vast majority of this was all Jim, you know. But
 6 if Dianne did help, it would probably be a
 7 follow-up to a phone call, you know. And then,
 8 hey, I got somebody and they give me an answer,
 9 type of thing. You know, like we're happy, excited
 10 to get numbers. I know, nerdy, but . . .
 11 Q. You've never -- strike that.
 12 Did you ever become aware or learn that
 13 Dianne Vrablic was using a significantly different
 14 methodology to collect any of the data that went
 15 into this spreadsheet than the methodology that you
 16 were using?
 17 A. I don't believe so because, like I said,
 18 it wasn't very complex. And Dianne and I work
 19 closely together. So our offices were right next
 20 door. I don't see how there would be a different
 21 way to do this right now.
 22 Q. So I want to ask you now more about the
 23 outreach you did to manufacturers --
 24 A. Okay.

Page 90

1 Q. -- when necessary.
 2 You testified that in some cases you
 3 conducted that outreach in order to generate
 4 estimates of their production of modern sporting
 5 rifles, correct?
 6 A. So I had a little mind -- so you had
 7 stated that I testified before that I would -- I'm
 8 sorry. Just repeat that. I had a lapse.
 9 Q. Not a problem. I'm not trying to trip you
 10 up, just orient you to the topic.
 11 So in some cases to get this data in an
 12 accurate form you would do the outreach to the
 13 manufacturers and request that they give you an
 14 estimate of their modern sporting rifle production
 15 for a particular year, right?
 16 A. Correct. In instances where a
 17 manufacturer had a rifles category, I go to their
 18 website and say, well, Remington, you make
 19 traditional rifles like a bolt action rifle or a
 20 semiautomatic that's not AR platform, and you make
 21 an AR platform rifle. The number is X.
 22 I call them up and say out of that number
 23 how many of them can we plug in as modern sporting
 24 rifles.

Page 91

1 Q. And you were involved in creating
 2 production estimates not just for one year like
 3 2016, but across multiple different data years; is
 4 that fair?
 5 A. Correct, yeah. I've been -- to the best
 6 of my recollection, I'm not sure what year I
 7 started this. It might have been -- let's just say
 8 2013, but I went backwards, filled in everything I
 9 could, and then, you know, went forward.
 10 I don't know if we updated every year or
 11 every other year. We were very well-worked, you
 12 know, at NSSF. We had so many things that we
 13 wanted to do. Sometimes we couldn't update
 14 everything on an annual basis.
 15 Q. Was it your usual practice when conducting
 16 that outreach to request information from
 17 manufacturers about their production of MSRs for
 18 each year individually or to get an overall
 19 estimate that you would apply over several years?
 20 A. Since there was so few from what I recall,
 21 it would have been, you know, a handful of phone
 22 calls. And so I would have checked every year for,
 23 you know, the vast majority of them.
 24 You know, again, use that Remington as an

Page 92

1 example because that was one they had, you know, so
 2 many different product lines, just make the call.
 3 Q. When you requested that information from
 4 the manufacturers, was it your practice to use the
 5 term modern sporting rifle or some other term?
 6 A. From what I recall, the vast majority of
 7 our manufacturers were very aware of modern
 8 sporting rifles. But if I was talking to, you
 9 know, a production guy -- clarify, this is what a
 10 modern sporting rifle is, AR, AK platform.
 11 And, again, you know, with a Remington,
 12 say, we're not talking about, you know, your
 13 traditional bolt action or lever action or
 14 whatever, you know. We're talking about the
 15 AR platform, so we'd clarify if I thought there was
 16 any way that they could misconstrue what we were
 17 looking for.
 18 Q. And other than identifying AR or
 19 AK platform rifles, was there any other standard
 20 language that you were in the practice of using to
 21 define the category of modern sporting rifle in
 22 these conversations?
 23 A. You said other than AR or AK, so the other
 24 language is modern sporting rifle.

Page 93

1 Q. I see. No other terms used to define the
 2 scope that you would in your usual practice use to
 3 explain that to the manufacturers?
 4 A. For this particular chart, no. I mean,
 5 like I said, when we first -- when I first got to
 6 NSSF, the term modern sporting rifle was relatively
 7 new. So it was AR, AK. There was, you know, black
 8 rifles or whatever the case may be.
 9 But as -- I hate to say I was well-known,
 10 but I knew a lot of people, and they knew me. And
 11 we all kind of used the same jargon. So modern
 12 sporting rifle was a pretty common term within the
 13 group of folks that I worked with.
 14 Q. Did you ever have to encourage or persuade
 15 manufacturers to participate in giving you
 16 information for this data?
 17 A. For this particular data, I had very
 18 little resistance. I had a really good reputation,
 19 not tooting my own horn, but the fact was I knew a
 20 lot of people. We provided a lot of valuable
 21 information to them. So when I called for
 22 something, thankfully a lot of people returned my
 23 call.
 24 MR. LOTHSON: Why don't we take a break? I

Page 94

1 need to step out for a second.
 2 MR. HAZINSKI: Yeah. Well, it's 12:05. Is it
 3 an appropriate time for --
 4 MR. LOTHSON: You tell me. How much longer you
 5 got to go?
 6 MR. HAZINSKI: There's more. We're going to
 7 take a lunch break.
 8 We can go off the record.
 9 (WHEREUPON, a recess was taken at
 10 12:05 p.m.)
 11 MR. HAZINSKI: All right. We're going back on
 12 the record. Just a few minutes before 1:00.
 13 BY MR. HAZINSKI:
 14 Q. Did you have a chance to eat lunch?
 15 A. I did. Thank you.
 16 Q. Did you talk to anyone other than your
 17 attorneys during the break?
 18 A. I did not.
 19 Q. You understand that you're still under
 20 oath?
 21 A. Correct.
 22 Q. I have a few more questions about the
 23 estimates from the modern sporting rifle production
 24 numbers.

Page 95

1 So we were discussing earlier your request
 2 to manufacturers about the number of their firearms
 3 that produced that were MSRs.
 4 When you -- was it your practice when you
 5 asked manufacturers for that information to ask
 6 them about the total number of firearms they
 7 produced that were MSRs or the proportion of their
 8 firearm models that were MSRs?
 9 A. So to the best of my recollection I would
 10 have used the number that was stated in the AFMER
 11 for a given year and said out of this number how
 12 many of those would be considered the modern
 13 sporting rifle.
 14 As we discussed, if somebody needed a
 15 definition, the AR, AK platform, so it would be
 16 about -- specifically about the modern sporting
 17 rifles, and a number out of that, whatever, let's
 18 just say it's a hundred thousand that's listed, how
 19 many of those would be modern sporting rifles. And
 20 then that's the number I would plug in as an
 21 estimate like, you know, a zero in everything.
 22 You know, in estimate cases as you can see
 23 throughout the report, there might be a lot of
 24 zeroed ones.

Page 96

1 Q. Did you have an understanding of how
 2 manufacturers arrived at those estimates typically?
 3 A. It was my understanding that the
 4 manufacturer has detailed production reports on
 5 each and every model. They would go and say, okay,
 6 we consider these models modern sporting rifles.
 7 They add up to be this number. Here's that number.
 8 Q. So would it be fair to say that typically
 9 your data entered into the cells in the spreadsheet
 10 we were discussing reflected specific production
 11 numbers that were given to you by the manufacturers
 12 directly?
 13 A. In some cases, from what I recall, those
 14 cases where I needed to find out more information.
 15 The other cases where, for example, if it was an
 16 AR manufacturer that all they produced was ARs, and
 17 that number was 21,167, usually that's the number I
 18 plugged right in there.
 19 And if it was -- you'll see some of these
 20 numbers. I think we discussed one that was, you
 21 know, the even thousand or something like that.
 22 Those were the ones where that manufacturer would
 23 have got back to me and said, oh, about a thousand
 24 of those, or something along those lines. The vast

Page 97

1 majority of them were, if not perfectly accurate,
 2 you know, very accurate.
 3 Q. To the best of your recollection, did
 4 manufacturers ever give you approximate estimates
 5 like 50 percent or 75 percent of their production
 6 was made up of MSRs as opposed to a particular
 7 total number?
 8 A. Yeah, to the best of my recollection, you
 9 know, I think the vast majority of them were very
 10 detailed and specific numbers, but there most
 11 likely were cases where they would say, you know,
 12 approximately 75 percent of those, you know, give
 13 or take are what they would consider modern
 14 sporting rifles.
 15 Q. And did -- in those cases did the
 16 manufacturers always tell you exactly how they
 17 arrived at that approximation?
 18 A. From what I remember, again, long time
 19 ago, if it was something I questioned, if they said
 20 zero percent or a hundred percent, well, you know,
 21 some of them are. Some of them can't be, right?
 22 According to the product mix online. But very few
 23 instances where I had to question somebody.
 24 I felt pretty confident for the most part

Page 98

1 that an answer I got made sense to me, and I didn't
2 need to bug them further about specifics.
3 Q. I want to direct you back to the
4 spreadsheet, Exhibit 3, with one more question on
5 the first page.
6 Do you see the block of cells highlighted
7 in orange corresponding to the years 1995 to 2004?
8 A. Correct.
9 Q. Do you have an understanding of why those
10 cells are highlighted?
11 A. Well, first of all, I think you said '94
12 to '04, but I think it's highlighted '95 to '04,
13 the ones I'm looking at here.
14 Q. You're right. Thank you.
15 A. And just not a hundred percent sure, but
16 it would make sense -- and I don't know why only a
17 certain block of them are. But that time period
18 other than the 94 kind of corresponds with the
19 assault weapons ban.
20 Q. Are you referring to the federal assault
21 weapons ban?
22 A. Yeah, so it is that ten-year time period.
23 But, again, looking at the chart, I don't know why
24 just however many rows are blocked out in that.

Page 99

1 Q. Did you ever -- strike that.
2 In situations where you were seeking
3 specific information from manufacturers about MSR
4 production, did you ever form an opinion that the
5 estimate they gave you, the number of MSRs that
6 they produced was not accurate?
7 A. Not to my recollection. Like I said, vast
8 majority of them made sense. There might have been
9 an instant or two where somebody said, oh, well,
10 all the things that we produce are MSRs. And I
11 said, well, looking at your website that's not the
12 case. But very rarely, you know, would that
13 happen. And I don't really ever recall that
14 happening. It could have happened.
15 MR. HAZINSKI: You can set this document to a
16 side, and I'll give you another. This will be -- I
17 think we're up to Number 4.
18 (WHEREUPON, Curcuruto Deposition
19 Exhibit No. 4 was marked for
20 identification.)
21 BY MR. HAZINSKI:
22 Q. You see this document is titled
23 NSSF Report 2021 Edition Firearms Retailer Survey
24 Report?

Page 100

1 A. Correct.
2 Q. Are you familiar with what kind of
3 document this is?
4 A. As far as what kind of document, I'm
5 familiar that this is a product very similar to a
6 product that I had oversaw for several years at
7 NSSF. I don't know if it was this particular
8 version that I had oversight on but similar ones.
9 Q. You mentioned reviewing -- I believe you
10 mentioned reviewing a firearms retailer survey
11 report in preparation for your deposition; is that
12 right?
13 A. So yesterday we briefly touched on this
14 one, but not in any detail or not this particular
15 one, one that looked like this.
16 Q. For the 2021 edition of this -- well, let
17 me take a step back.
18 Can you briefly describe during your work
19 at NSSF the purpose of this kind of report?
20 A. Sure. So NSSF being a trade association
21 for the firearms industry, they were a member-based
22 organization. At one point they had approximately
23 10,000 members. A large percentage of those
24 members were firearm retailers which are the people

Page 101

1 that sell the guns and ammo and all the things that
2 go in and around a firearm or hunting and the
3 shooting sports.
4 So in an effort to provide resources to a
5 big chunk of our membership, we would produce
6 reports such as this firearm retailer report. And
7 it was a survey of firearm retailers. We'd
8 aggregate their responses, put it in this report,
9 and then provide it to our membership.
10 I believe anybody that took the survey got
11 a complete response back. And then, you know, I
12 think we sold it to different levels of membership.
13 Some people got it for free. Some people might
14 have been be a 50-dollar or a-hundred-dollar price
15 on it just to generate a little revenue internally.
16 Q. Do you recall if you were specifically
17 involved in any aspect of the preparation of the
18 2021 edition of this report?
19 A. Going back, I'll say potentially I was.
20 Because if they fielded this in 2021 and calling it
21 the '21, then I wouldn't have been directly
22 involved in it. I can check.
23 Sometimes they would put when it was
24 actually fielded, but, you know, the date on the

Page 102

1 back corner of the -- item number on the bottom
 2 right, it says 3-21. That's how we kind of coded
 3 it, March '21. So that would have been after the
 4 fact after I left. So more than likely I did not,
 5 you know, oversee this particular report.
 6 Q. Could you turn to Page 1 that has the
 7 stamp NSSF 56, please?
 8 A. I've got 55 and 57. You shorted me.
 9 Q. I'll pass you my copy here.
 10 MR. LOTHSON: I object to this exhibit.
 11 THE WITNESS: Yeah, I got odd numbers.
 12 MR. HAZINSKI: Printer error I suppose.
 13 BY MR. HAZINSKI:
 14 Q. Can you see there a Number 56?
 15 A. Okay.
 16 Q. If you review the section under the term
 17 overview, does that give you any indication of when
 18 it was fielded?
 19 A. I'll read this. Overview of the report is
 20 the result of an in-depth analysis of U.S. firearm
 21 retailer industry sponsored by the National
 22 Shooting Sports Foundation. The information for
 23 this report was collected in an online survey
 24 retailers conducted February through March 2020.

Page 103

1 The survey response is 313 retail establishments
 2 across all the states.
 3 So if this indeed was fielded in 2020, the
 4 data -- I don't know why it would have taken so
 5 long, March 2021, to get out. But potentially then
 6 I did oversee this one because I was still
 7 at -- employed at NSSF during the time of this one
 8 here.
 9 Q. Do you think it would be fair to say you
 10 may have been involved during an earlier stage of
 11 the data-gathering process, but not necessarily as
 12 it was finalized?
 13 A. Looking back, yeah. I don't recall if,
 14 you know, I was around when the final version went
 15 to print. Just looking at the March 21st date, if
 16 that's when this went to -- was sent out to
 17 everybody, then I wouldn't have been involved with
 18 the final, final product. But it appears as though
 19 I would have been involved in the development of
 20 it, maybe just not the final product.
 21 Q. The portion that you read on Page 56,
 22 internal Page 1, said that the survey responses
 23 came from 313 retailers; is that right?
 24 A. Correct. You want to share this one?

Page 104

1 Q. That's all right.
 2 Do you know how many total firearm
 3 retailers existed in the United States at the time
 4 this survey was fielded?
 5 A. I don't recall how many were in existence
 6 at the time when this one was studied. I know
 7 ballpark 60-ish, 70 percent of our membership was
 8 made up of firearm retailers, maybe that number.
 9 So we felt like our membership was, I guess you
 10 would say, the cream of the crop on what -- the
 11 number of retailers that were out there.
 12 There's a lot of FFLs that are mom-and-pop
 13 shops that just -- we call them basement folks that
 14 might have just been an individual that didn't have
 15 a brick and mortar store, but we were more focused
 16 on learning about the larger
 17 manufacturers -- larger retailers when it came to a
 18 report like this.
 19 Q. Are you aware of any steps that were taken
 20 to ensure that the set of 313 respondents was a
 21 statistically sufficient sample size for reliable
 22 analysis?
 23 A. You know, again, we talked a little bit
 24 about going back to my recollection of that 95 and

Page 105

1 5 percent confident level. If our sample was, for
 2 example, we had 5,000 NSSF members that were
 3 retailers and we sent this out to them, we would
 4 have plugged that 5,000 into the online formula.
 5 We want a 95, 5. And it would have spit out a
 6 number saying, okay, you need 300 responses to get
 7 that 95, 5.
 8 I don't see anywhere in this report where
 9 we have that confidence level, so -- and,
 10 unfortunately, I'm not sure what the margin of
 11 error and confidence level is in this one.
 12 (Reporter clarification.)
 13 BY MR. HAZINSKI:
 14 Q. Would you agree as a general proposition
 15 that the number of survey respondents that you
 16 would need to reach that confidence level and
 17 margin of error would be larger if the total number
 18 of retailers was 50,000 rather than 5,000?
 19 MR. LOTHSON: Objection, incomplete
 20 hypothetical.
 21 THE WITNESS: Yeah, to the best of my
 22 knowledge, again, plugging in that formula,
 23 the -- I think it was harder to get to a higher
 24 confidence level with a lower number of sample that

Page 106

1 you had.

2 So, for example, if you only had a hundred

3 or ten people that you were gonna send the survey

4 to, you'd need, you know, nine out of ten of them,

5 for example, to get a high confidence level.

6 If you had a thousand, you wouldn't need

7 that same nine hundred, that same percentage. But,

8 again, that's just off the top of my head. I have

9 to go back and look at that formula that we used.

10 BY MR. HAZINSKI:

11 Q. In conducting surveys of retailers how did

12 NSSF typically promote those surveys to garner

13 responses?

14 A. Sure. So we had obviously a very good

15 name recognition with NSSF. They're already most

16 likely member paying -- member dues paying folks

17 that were getting the survey. We also had some

18 probably lapsed retailers still in our database

19 that still got the survey.

20 But the incentive was if you filled it

21 out, you got a free copy of the full report. So

22 you would know your individual responses to a

23 question, and then you get to see the aggregate of

24 313. So pretty valuable, right? Resource to a

Page 107

1 firearm retailer.

2 And then on occasion we would also

3 incentivize surveys to hopefully increase response,

4 and that could be a chance to win an optic or

5 something along the lines there. That's pretty

6 standard procedure.

7 Q. Aside from soliciting responses from

8 NSSF's own members, did -- are you aware of any

9 efforts that NSSF typically engaged in to solicit

10 survey responses from other groups or other lists

11 of contacts?

12 A. For this particular one, I'm not aware of

13 that. I believe we strictly focused on our own

14 database. That's from what I recall.

15 Q. Would you agree that that method of

16 contacting potential survey respondents would be

17 likely to result in a disproportionate number of

18 respondents who were already members of NSSF?

19 A. Run that by me one more time.

20 Q. NSSF promoted this survey to its own

21 membership primarily.

22 Is that what your testimony is today?

23 A. Correct.

24 Q. You agree that that way of promoting the

Page 108

1 survey means that the survey respondents will be

2 disproportionately NSSF members as opposed to the

3 proportion of retailers that are NSSF members in

4 the population as a whole?

5 MR. LOTHSON: Objection, form argumentative.

6 THE WITNESS: Sure.

7 MR. LOTHSON: Go ahead if you know.

8 THE WITNESS: So I think I get what you're

9 saying. So basically, again, we realize that our

10 members were the cream of the crop retailers,

11 right? Those are the ones we want to get responses

12 from. We didn't want to get a response from one

13 guy that has an FFL that, you know, doesn't really

14 do e-commerce, right? They might have it for their

15 own personal reasons or for their friends to

16 transfer firearms, but that's not the person that

17 we wanted to respond to this survey.

18 So we felt the sample that we had of our

19 internal database was the best one to use

20 especially because this was really a report going

21 back to our members. So it was actually stronger

22 to have a response from just our members or

23 primarily our members when we're giving back the

24 data to our members so they can match themselves up

Page 109

1 to very similar retailers out there.

2 BY MR. HAZINSKI:

3 Q. Do you know whether NSSF ever did any

4 analysis to determine what proportion of the total

5 number of modern sporting rifle sold in the

6 relevant time period were sold by these

7 313 retailers in specific?

8 A. I am -- you know, I'm a little bit fuzzy

9 on going back that far. I have no recollection

10 that we ever tried to identify among NSSF members

11 what percentage of all MSR sales were conducted by

12 NSSF member retailers.

13 Q. What steps did NSSF take to ensure that

14 the survey respondents who filled out the

15 information used to make this report were

16 representative of the total population of firearm

17 retailers more broadly?

18 MR. LOTHSON: Objection, form, foundation.

19 THE WITNESS: So what we tried to do -- in this

20 project here I think we had the support of

21 Southwick Associates to help us administer the

22 survey.

23 And what we would do is once the responses

24 came in, you know, we would do quality control

Page 110

1 checks, both at Southwick and internally at NSSF,
 2 but we were more concerned about getting quality
 3 responses. And our members are nationwide. NSSF,
 4 you know, has members in all 50 states.
 5 So we're happy with the representation of
 6 the 313 that were in this sample here. Happy
 7 enough for sure to put this product out so our
 8 retailers could make business decisions off of it.
 9 BY MR. HAZINSKI:
 10 Q. Are you aware of any statistical weighting
 11 that was done, W-E-I-G-H-T-I-N-G, that was done to
 12 the survey results?
 13 A. Again, going back to my knowledge, when we
 14 did weight some surveys, we would typically mention
 15 that in here. I don't see any reference to
 16 weighting in this report. So for the most part
 17 there was probably not weighting for this
 18 particular study.
 19 Q. Do you know how the term modern sporting
 20 rifle was defined for the purposes of this report?
 21 A. I would assume, going back, that when we
 22 did identify a modern sporting rifle it would be
 23 that same terminology that we talked about before,
 24 semi-automatic rifle capable of holding a

Page 111

1 detachable magazine AR, AK platform, semi-automatic
 2 one-pull trigger.
 3 And, you know, it became a very common
 4 term because NSSF used it so often among our
 5 members that they understood what that was. And if
 6 there were questions -- I don't recall ever
 7 fielding too many questions, you know, what is a
 8 modern sporting rifle, but to the best of my
 9 knowledge that's how we would have identified it.
 10 Q. Could you please look at Page 6 of the
 11 report which is NSSF 61?
 12 A. Okay.
 13 Q. Do you see that one of the data categories
 14 is AR style slash modern sporting rifles?
 15 A. Correct. Yep.
 16 Q. Does that indicate to you whether modern
 17 sporting rifles for the purposes of this report is
 18 a term used synonymously with AR style firearms?
 19 A. Correct. We typically uses AR platform --
 20 AR, AK platform. It looks like due to the amount
 21 of space there. And I think we started doing these
 22 surveys probably back 2010 or so. So at the time
 23 we probably wanted to have as much of a definition
 24 as possible, AR, AK platform, modern sporting

Page 112

1 rifles.
 2 I would have -- I would recommend that
 3 moving forward they probably just could use modern
 4 sporting rifles from now on, but . . .
 5 Q. Do you know whether survey respondents for
 6 the purposes of this survey were told whether to
 7 include or exclude AR style pistols, for example?
 8 A. To the best of my recollection they were
 9 not told to exclude them. Again, it was not really
 10 a category that we tracked during my tenure there.
 11 Maybe toward the tail end it was a topic of
 12 discussion, but nothing that we looked at
 13 specifically in detail.
 14 Q. I want to ask you now some questions about
 15 magazines and NSSF's estimates around those.
 16 Could you please look again at what we
 17 marked as Exhibit 1 which was the firearm
 18 production in the United States report?
 19 A. 18 or 23 or 20 or 23?
 20 Q. 23, please.
 21 A. Go ahead.
 22 Q. If you have that, I'd ask you to look at
 23 the page marked NSSF 23, the internal Page 7 for
 24 the magazine chart?

Page 113

1 A. I have it.
 2 Q. Do you recall I showed you this earlier
 3 and asked about the methodology that you used for
 4 it?
 5 A. Correct.
 6 Q. Your conclusion based on that methodology
 7 was that there were about 300,000,000 magazines in
 8 the possession of consumers in the U.S. from 1990
 9 through 2018.
 10 Is that a fair description?
 11 A. Correct. From the magazine chart, yeah,
 12 looks like about 304,000,000 total, yep.
 13 Q. Does that 300,000,000 number as you
 14 understand it reflect the number of magazines
 15 actually existing and possessed by consumers at the
 16 time the report was issued?
 17 A. The NSSF magazine chart from how I
 18 originally -- I think we talked about the
 19 methodology or how we -- there wasn't a chart
 20 available out there. So we used the AFMER data and
 21 some other pieces to fill it in. You know, that
 22 was our initial understanding of that.
 23 I think as -- we didn't have any other
 24 resources available to add to that. I know there

Page 114

1 was a huge aftermarket for magazines, but that was
 2 not factored in heavily in the study that I had
 3 done.
 4 Q. As a general matter, magazines once
 5 they're manufactured and sold are often used by the
 6 buyer and then likely discarded.
 7 Would that be fair to say?
 8 MR. LOTHSON: Objection, form, calls for
 9 speculation.
 10 THE WITNESS: I don't know why anybody would
 11 throw away a perfectly good magazine, but if it
 12 malfunctioned, they're not expensive to replace.
 13 But I think they last quite sometime, so I don't
 14 see why anybody would discard them.
 15 BY MR. HAZINSKI:
 16 Q. As you sit here today do you believe that
 17 these data and this chart provide a reasonable
 18 approximation of the number of magazines produced
 19 for U.S. consumers within that data range?
 20 A. Yeah, sitting here today I feel confident
 21 in the way -- when I conducted the research with
 22 the sources that I had available to me, I feel
 23 confident that that number was a good
 24 representation.

Page 115

1 Again, we didn't want to put something out
 2 that was not reliable enough for somebody to make a
 3 decision on.
 4 MR. HAZINSKI: I'm going to show you another
 5 document. This will be Exhibit 5.
 6 (WHEREUPON, Curcuruto Deposition
 7 Exhibit No. 5 was marked for
 8 identification.)
 9 BY MR. HAZINSKI:
 10 Q. This is entitled Detachable Magazine
 11 Report 1990 to 2021, correct?
 12 A. Correct.
 13 Q. For the record it's NSSF 1994 through
 14 1997.
 15 Was this one of the documents you reviewed
 16 in preparation for your deposition today?
 17 A. I did not review it in preparation.
 18 However, I did look at it when NSSF first put it
 19 out because I had read a release about it and it
 20 piqued my curiosity.
 21 Q. Did you have any involvement in the
 22 preparation of this report?
 23 A. I did not.
 24 Q. Do you have any personal knowledge of the

Page 116

1 methodology used to prepare this report?
 2 A. The only knowledge I have is from kind of
 3 the methodology that's in here. And I believe
 4 there was some discussion in the deposition that I
 5 read with Salam about this as well, but I don't
 6 remember the particulars that were in there.
 7 Q. Would it be fair to say you don't -- you
 8 didn't have any hand in developing the methodology
 9 directly that was used in this report?
 10 A. Correct. I did not, yeah, have any
 11 knowledge of what was produced here. This was
 12 completely done after my time.
 13 Q. As you sit here today, can you from your
 14 personal knowledge vouch for the accuracy or
 15 reliability of any findings in this report?
 16 A. I have not really dug too deep in it.
 17 It's not a very high -- you know, not a lot in this
 18 report. So I haven't looked at it enough to look
 19 at the methodology in detail to see how accurate or
 20 not accurate it would be in my opinion.
 21 Q. Could you please turn to the third page of
 22 the document that has the NSSF 1995 stamp, please?
 23 A. Okay.
 24 Q. This reflects a grand total firearm

Page 117

1 magazine estimate for the years 1990 through 2021
 2 of 963,772,000, correct?
 3 A. Correct.
 4 Q. Now, this includes three additional data
 5 years beyond the scope of the magazine chart that
 6 you prepared, right?
 7 A. I believe that one was through '18. So
 8 this includes '19, '20, '21, correct? Yep, three
 9 more years.
 10 Q. Do you agree that through whatever
 11 methodology NSSF used to generate these numbers it
 12 resulted in a far higher estimate of magazines than
 13 the estimate you had produced a few years earlier?
 14 A. Correct, yeah. 963 versus 304 million,
 15 yep.
 16 MR. HAZINSKI: Well, let's set that to the side
 17 for a moment.
 18 I want to show you another document. Some
 19 of these seem to have the similar printing error,
 20 but I'm going to give you one that's formatted
 21 correctly. This will be Exhibit 6, I believe.
 22 (WHEREUPON, Curcuruto Deposition
 23 Exhibit No. 6 was marked for
 24 identification.)

Page 118

1 BY MR. HAZINSKI:
 2 Q. Have you seen this document before?
 3 A. Without reviewing it thoroughly, I believe
 4 this is a report that I produced back in
 5 approximately 2013. So I have seen it, yes.
 6 Q. For the record I'll note the Bates range
 7 of this production is NSSF 5902 through 5987.
 8 And this is a report called Modern
 9 Sporting Rifle Comprehensive Consumer Report 2013,
 10 correct?
 11 A. Correct.
 12 Q. Toward the bottom of the cover page it
 13 says Sports Marketing Surveys USA.
 14 Do you see that?
 15 A. I do.
 16 Q. What is Sports Marketing Surveys USA?
 17 A. They are a nationwide research firm based
 18 out of Florida, and we contracted them to do some
 19 work for NSSF. This is one of the projects they
 20 did for us.
 21 Q. How were they selected to work on this
 22 project?
 23 A. I received a lot of calls from vendors
 24 saying, oh, you know, we can help you with your

Page 119

1 services. And I vetted them pretty heavily.
 2 When I first started at NSSF we primarily
 3 used two sources, Responsive Management and
 4 Southwick Associates, to do the bulk of our outside
 5 work, outside contract work. But I wanted to
 6 expand the amount of companies that we worked with.
 7 So Sports Marketing Surveys, you know, had
 8 reached out to me, and I vetted them and felt
 9 comfortable with their methods and history and
 10 experience. So we ended up contracting them to
 11 help us with the report like this.
 12 Q. Before working on this report, did Sports
 13 Marketing Surveys work on any other reports for
 14 NSSF?
 15 A. To the best of my recollection, I know
 16 they -- I believe they also conducted this report
 17 in 2010 for us. I don't know if they did any other
 18 for us. None are coming to mind. But I believe
 19 they helped us with a similar report prior to this
 20 one.
 21 Q. Who at Sports Marketing Surveys was
 22 involved in creating the 2013 edition?
 23 A. My two primary contacts, from what I
 24 recall, Keith Story and Neil Schwartz.

Page 120

1 Q. Based on your work with Sports Marketing
 2 Surveys, did you form an opinion that Sports
 3 Marketing Surveys used a reliable methodology?
 4 A. Yeah, going back ten years ago I don't
 5 believe I would have contracted them if I didn't
 6 believe that they had a good methodology and a good
 7 product.
 8 Q. Since they conducted a consumer survey in
 9 2010 and were brought back to conduct one in 2013,
 10 would it be fair to say that you felt based on
 11 their work on the 2010 report that they did a high
 12 quality of work?
 13 A. I believe that would have been part of my
 14 line of reasoning to bring them back a second time.
 15 Just now, you know, thinking about my work with
 16 them, I remember they were impressed with the
 17 response range that we got. I think 7,000, I just
 18 noticed, on the first time around and 21,000
 19 responses the second time around which are, you
 20 know, a pretty high number for an online survey at
 21 the time.
 22 Q. When you contracted with Sports Marketing
 23 Surveys for the 2013 report, did you anticipate
 24 that they would use a substantially similar

Page 121

1 methodology to the one they employed in the 2010
 2 report or a different one?
 3 A. When I contracted them in '13, going back,
 4 you know, best of my recollection, I believe I
 5 would have wanted a very similar methodology so
 6 that we could have established trend data.
 7 And I believe throughout this report most
 8 instances we provide trend data from here is what
 9 the response was in 2010 to a question and here's
 10 what the response was to that same question or very
 11 similar question in 2023. So that way the folks
 12 using this report, you know, primarily would be our
 13 NSSF members, could see maybe opportunities or, you
 14 know, which way the market was shifting.
 15 Q. So this was the context in which NSSF
 16 published a report, but the data was gathered by an
 17 outside organization, in this case Sports Marketing
 18 Surveys.
 19 In that situation -- I'm sorry. Go ahead.
 20 A. No, go ahead.
 21 Q. In that situation were you still
 22 responsible in your role at NSSF for making sure
 23 that the report had reliable and accurate
 24 methodology?

Page 122

1 A. Correct. So basically, you know, the buck
 2 stopped with me, right? If a report was good, it
 3 was a team effort. If the report was bad, it's --
 4 I take the credit for something like that. So I
 5 wanted to make sure, you know, I didn't have to be
 6 stuck with that.

7 So when I would work with companies I
 8 wanted to make sure they were vetted correctly.
 9 And, you know, Sports Marketing Surveys, I believe
 10 from my recollection worked with other sporting
 11 goods within their market, so they were familiar
 12 with the outdoor customer. And, again, I think
 13 they put together a pretty good product with a good
 14 methodology.

15 Q. Can you describe the steps that you took
 16 to vet the reliability of the information produced
 17 by Sports Marketing Surveys for NSSF?

18 A. Sure. One thing I recall doing with
 19 pretty much all my vendors that I would bring on if
 20 I wasn't familiar with them was to call an existing
 21 client of theirs and say, hey, you know, I notice
 22 that Sports Marketing Surveys did this for you; is
 23 it somebody that you would continue to work for.
 24 And there were certainly instances people

Page 123

1 said they would shy away from them, and that helped
 2 me, you know, make a decision against somebody
 3 maybe. But in the case of Sports Marketing Surveys
 4 they had some pretty good recommendations from what
 5 I recall.

6 Again, you know, we wanted to put out that
 7 product that would help our members make a better
 8 decision, and the modern sporting rifle topic was a
 9 pretty prevalent topic among our membership at the
 10 time in 2013.

11 So pretty proud of a product like this
 12 that has, as you can see, a lot of information in
 13 there. It's got some trend data as well. So yeah,
 14 we were happy with the work they did.

15 Q. Other than calling references who had
 16 worked with Sports Marketing Surveys in the past,
 17 were there other steps that you took to check or
 18 vet the reliability of the information they were
 19 providing you?

20 A. To the best of my recollection, it was
 21 somewhat feel, right? When I was talking to the
 22 people, Keith and Neil, did they understand the
 23 consumer that we were looking to get. Did they
 24 understand the barriers to, you know, reach that

Page 124

1 customer and best ways to obtain a quality response
 2 from them. So in addition to, you know,
 3 references, I would call it a personal feel on, you
 4 know, how I talk to people.

5 There were instances, again, when I would
 6 talk to somebody, and I'd ask them what NSSF stands
 7 for. If they didn't know the answer, they weren't
 8 getting our business, right?

9 I mean, we'd get cold calls all the time.
 10 Hey, we can do this survey for you. Okay. What
 11 does NSSF stand for? Oh, I don't know. So they
 12 obviously weren't that -- you know, they were just
 13 doing cold calls. But I recall Keith had a
 14 personal interest in, you know, what NSSF was
 15 about.

16 Q. Did checking the reliability of the
 17 information -- strike that.

18 When you checked the reliability of
 19 information provided by Sports Marketing Surveys to
 20 NSSF, did you confirm any of their mathematical or
 21 statistical calculations to make sure they were
 22 done correctly?

23 A. So prior to hiring them I don't believe I
 24 would have checked any of their mathematics, you

Page 125

1 know, from existing reports, but that's where I
 2 would, you know, get the references. And the
 3 references were happy with how they conducted the
 4 study, including their methodology and their many
 5 statistics involved.

6 Q. To put it maybe colloquially, NSSF wasn't
 7 rerunning all the numbers they were getting from
 8 Sports Marketing Surveys to make sure that they
 9 were right; is that fair?

10 A. Certainly not previous to any work, you
 11 know, that wasn't NSSF's work, but there was a
 12 certain amount -- again, this is just general going
 13 back. There's a certain amount of features or
 14 fail-safes that you can put into surveys when
 15 you're conducting them. You know, we could call
 16 them gotcha questions.

17 For example, we'd say, hey, do you use
 18 your modern sporting rifle for any of these
 19 purposes, and you list the purposes. And one of
 20 those purposes might have been something ridiculous
 21 that you would never use a modern sporting rifle
 22 for, for example, sporting clays. And if somebody
 23 checked the box, I use my modern sporting rifle for
 24 sporting clays, which is nothing that anybody would

Page 126

1 ever do, we would get rid of their responses
 2 entirely, wipe them out of the survey.
 3 There's -- we know that the average
 4 response time would be 10 minutes, 15 minutes to
 5 take this study. And we would get responses, and
 6 you could sort them in from this guy did this
 7 survey in a minute. This guy did it in, you know,
 8 two days or something like that. So we would get
 9 rid of those people that we call speeders that are
 10 just taking that survey just to maybe potentially
 11 have a chance to win something if there was an
 12 incentive on it.
 13 So I know we had -- in addition to the
 14 fail -- the gotcha questions and the speeders, we
 15 also had some things called patterning or
 16 straightlining. And so straightlining might be the
 17 answer is C, C, C, C, C. Like, you know, some kid
 18 did it in SATs in high school who didn't know how
 19 to take a test or, you know, that type of thing.
 20 So there were some fail-safes.
 21 The last thing I remember that we did was
 22 looking at -- sometimes throughout a survey we had
 23 open-ended questions. Hey, John, or, you know,
 24 tell us what you think about -- what features do

Page 127

1 you like the most about this, and open-ended
 2 response. So we'd read through all those
 3 open-ended responses, and, you know, if something
 4 made no sense or something like that, again, I use
 5 this gun for sporting clays purpose, you know, we
 6 would delete those.
 7 So it was a painstaking process, but again
 8 we wanted to have that best product for our end
 9 user. And luckily, you know, I was never under
 10 pressure. Get stuff done. You have to have this
 11 report out by this date. Never had that pressure.
 12 So I had the luxury of taking my time going through
 13 all those steps making sure I put out the best
 14 product I could.
 15 Q. Do you know whether any gotcha questions
 16 were used to assess the survey respondents in the
 17 preparation of this report?
 18 A. Unfortunately, I can't recall. I know we
 19 did it in several instances. I don't know if this
 20 was one of those instances.
 21 Q. Okay. How did you decide whether or not
 22 to include those types of questions?
 23 A. It was, I guess, kind of standard practice
 24 to go through some of those. Certainly the

Page 128

1 speeders was an easy one because that was an easy
 2 one to look at.
 3 But, you know, it was brought to my
 4 attention about those gotcha questions by a vendor.
 5 I don't know if it was Sports Marketing Surveys or
 6 another vendor that introduced that to me. But I
 7 thought it was pretty cool, and I tried to include
 8 that in a lot of the stuff I did moving forward.
 9 Q. In terms of weeding out surveys responses
 10 based on the time taken to complete the survey, for
 11 this report who would have been responsible for
 12 weeding out those responses, Sports Marketing
 13 Surveys or NSSF?
 14 A. To the best of my recollection, again, you
 15 know, ten years ago, I've had a -- I'm very
 16 comfortable with Keith and Neil's knowledge of how
 17 to do surveys, and they would have been primarily
 18 responsible. Would I have reminded them or asked
 19 them, hey, did can you take out the speeders?
 20 Probably. But I just don't recall exactly at this
 21 time.
 22 Q. As you sit here today, do you have an
 23 independent recollection of whether that strategy,
 24 taking out the speeders, was used as part of the

Page 129

1 preparation of this report?
 2 A. Again, I don't recall. I assume we would
 3 have done stuff like that, but I don't recall.
 4 Q. For the purposes of this report, what does
 5 the phrase modern sporting rifle mean?
 6 A. Well, for this report in 2013, I believe
 7 we had a pretty clear definition on the intro of
 8 this survey. So like prior to taking the survey
 9 there was a definition of it.
 10 I know for the 2010 survey and I believe
 11 for the 2013 survey as well, we actually had a
 12 video introduction that explained what a modern
 13 sporting rifle was. It was me at the range, and
 14 here's an R15. This is the type of firearm we're
 15 looking for you to respond.
 16 Because, again, in 2010, 2011, that term
 17 modern sporting rifle was probably not very
 18 familiar with a lot of AR, AK owners. So we wanted
 19 to make sure we explained it in very good detail so
 20 there couldn't be any misunderstandings of what we
 21 were looking for.
 22 Q. Could you look at Page 5 of the report
 23 which is NSSF 15 -- excuse me, NSSF 5908, please?
 24 A. I have it open.

Page 130

1 Q. I want to direct your attention to a
 2 sentence in the first paragraph that says, in the
 3 2013 survey MSR's were specified as either an AR
 4 platform, AK platform or other semi-automatic rifle
 5 with a detachable magazine.
 6 Did I read that correctly?
 7 A. AR, AK or other semi -- okay. That looks
 8 correct.
 9 Q. The definition of MSR's in this sentence,
 10 is that definition the same as or different from
 11 the definition used in the Firearm Production in
 12 The United States report that you worked on?
 13 A. So the firearm production report in the
 14 U.S., you know, primarily is AR, AK platforms for
 15 the modern sporting rifles. This has or other
 16 automatic rifle with detachable magazine, which I
 17 believe was explained a little bit more in detail
 18 again in that introductory video to clarify, you
 19 know, we're looking for AR platform, AK platform.
 20 But the other automatic rifle with
 21 detachable magazine is a little bit different than
 22 the standard definition we've been talking about
 23 for the previous examples.
 24 MR. LOTHSON: Just for the record, it says

Page 131

1 semi-automatic, not automatic.
 2 THE WITNESS: Did I -- okay. If I misspoke,
 3 I'll clarify. I'll read, in the 2023 -- 2013
 4 survey, MSR's were specified as either an
 5 AR platform, AK platform or other semi-automatic
 6 rifle with a detachable magazine.
 7 BY MR. HAZINSKI:
 8 Q. Do you agree that this definition of MSR
 9 would exclude pistols?
 10 A. At the time that we did this, and we're
 11 going back ten years, again, AR-15 pistols I don't
 12 think were prevalent at all. Certainly I don't
 13 have much recollection for them. So we didn't have
 14 much of a definition or disclaimer to include them
 15 or not exclude them.
 16 Q. Do you agree that this definition of MSR's
 17 would also exclude shotguns?
 18 A. Yeah, I would agree that this definition
 19 of MSR's would exclude shotguns.
 20 Q. Do you know why or could you explain
 21 further why NSSF used a definition of MSR in this
 22 report that encompassed other semi-automatic rifles
 23 with a detachable magazine whereas in other reports
 24 that category was not part of the definition that

Page 132

1 was given?
 2 A. I'm actually trying to think of that while
 3 you were talking about that because it is a little
 4 bit different. And, you know, going back
 5 ten years and again don't know this for sure, but
 6 potentially as markets shift and new products come
 7 to market, there might have been, you know, a new
 8 category or, you know, a new rifle that may not
 9 have been exactly an AR-15 or an AR, AK.
 10 So it may be an AR-10 or something like
 11 that. It could have been in that definition. But,
 12 unfortunately, I don't know specifically why we did
 13 it. I wish I did.
 14 Q. During the period you worked at NSSF, was
 15 modern sporting rifle a term whose meaning shifted
 16 over time?
 17 A. I believe it shifted somewhat with the
 18 advent of new products to market kind of. I had
 19 mentioned the AR-10, but primarily modern sporting
 20 rifles during my tenure there were AR, AK platform.
 21 That was the very much bulk of them.
 22 Q. I want to ask you about a previous page of
 23 this document which is Page 4, NSSF 5907.
 24 A. Okay.

Page 133

1 Q. Do you see this page with the word
 2 methodology at the top?
 3 A. Yes.
 4 Q. Do you know whether the language on this
 5 page was drafted by someone at NSSF or drafted by
 6 someone at Sports Marketing Surveys?
 7 A. Just give me one minute to read it.
 8 Q. Take your time.
 9 A. Okay. So you had asked if I knew the
 10 methodology was written by NSSF or Sports Marketing
 11 Surveys. So to the best of my recollection it's
 12 something that we both would have wrote together.
 13 You know, I was heavily involved in finding the
 14 organizations to help us place the banner ads to
 15 reach places that we thought modern sporting rifle
 16 owners would be.
 17 For example, the last paragraph there, the
 18 very high level of confidence with the plus, minus
 19 0.29 percent and 0.68 percent not confidence level
 20 may have been duly created by me and the folks at
 21 Sports Marketing Surveys.
 22 Q. I want to direct your attention to the
 23 part on this page in the middle paragraph that
 24 says, to further pair down response.

Page 134

1 Do you see that?

2 A. Okay.

3 Q. To further pair down response to those

4 that would correctly complete the survey, the

5 survey's initial question asked, do you own at

6 least one modern sporting rifle. If you do not own

7 an MSR, but would still like to be entered into the

8 contest, select no. These safeguards narrowed

9 feasible responses from 26,719 to 21,942.

10 Did I read that all correctly?

11 A. Correct.

12 Q. That means that the report analyzed

13 responses only if the respondents reported that

14 they owned at least one MSR; is that right?

15 A. Correct. Yeah, and that was kind of

16 another one of those safeguards. And I think this

17 was -- again, we're going back, to my recollection,

18 ten years ago -- something that Sports Marketing

19 Surveys may have suggested including.

20 Because sometimes -- okay. Well, I want

21 to -- maybe I don't own one, but I want a chance to

22 win a \$500 gift card. So this was one of those

23 fail-safes that allowed people to self-select and

24 say, all right, I'll just get a chance to win that

Page 135

1 rather than taking that survey providing this

2 information that we would try to have to weed out.

3 So another -- I appreciate you bringing

4 that up because I think it's another safeguard that

5 make the results even stronger.

6 Q. Limiting the data in display means that

7 all of the data generated was from responses by MSR

8 owners or individuals who report owning MSRs rather

9 than from a broader swath of gun owners more

10 generally, right?

11 A. That was certainly the hope of it, yes.

12 Q. Is it fair to say that this is not a

13 survey of the overall consumer market for firearms?

14 A. This survey specifically was delving into

15 the topic of modern sporting rifles, not all

16 firearms. I don't know if there's some questions

17 in here, there may be, about what other firearms do

18 you own.

19 But the bulk of it was to determine things

20 like, you know, ownership and usage and features

21 and accessories and costs. And I think that's all

22 laid out throughout the report.

23 Q. You agree that the scope of this survey is

24 designed such that there would not be any counted

Page 136

1 survey responses from individuals who chose not to

2 buy any modern sporting rifles at all?

3 A. What we tried to do was certainly weed out

4 anybody that didn't own a modern sporting rifle.

5 We wanted responses from just those that at least

6 owned one modern sporting rifle under the

7 definition.

8 Q. So hypothetically if there were a

9 potential survey respondent who chose not to buy

10 any MSRs at any point in their life because, for

11 example, they believed they weren't useful for

12 self-defense, their responses would not be counted

13 within these results; is that right?

14 A. Okay. So hypothetically and then you went

15 into something about self-defense. Clarify that

16 for me. I'm sorry.

17 Q. Sure. So let's take a hypothetical gun

18 owner --

19 A. Okay.

20 Q. -- who doesn't own my modern sporting

21 rifles because, just to take an example, they don't

22 believe that they're a good self-defense tool.

23 Are you with me so far?

24 A. Sure.

Page 137

1 Q. If that person -- a person in that

2 category, a non-MSR owner, their opinions about

3 MSRs would not be counted among the survey results

4 reported in this document, correct?

5 MR. LOTHSON: Objection, incomplete

6 hypothetical.

7 THE WITNESS: So from what I understand about

8 the question, you know, our goal for this was to

9 have as many of these 21,942 responses come from

10 people that owned at least one modern sporting

11 rifle.

12 BY MR. HAZINSKI:

13 Q. And part of the purpose of this survey was

14 to get an understanding of the purposes for which

15 modern sporting rifles are popular; is that fair?

16 A. It was very broad ranging. Again, well,

17 at the time we did the first one in 2011 or 2010,

18 there was like almost no information on the modern

19 sporting rifle consumer.

20 So we did that first one, and then they

21 were probably becoming more popular, and that's

22 probably why we came back and did the study again

23 in 2013.

24 So as you can tell -- I mean, there's a

Page 138

1 lot of information in here. So the purpose of
2 doing it was to provide as much information as
3 accurately as possible to our NSSF members so they
4 could make that business decision.
5 For example, if they're a manufacturer
6 that wasn't producing them and they saw this and
7 say, oh, there's an opportunity, they, you know,
8 might spend some resources to then have a product
9 line developing modern sporting rifles.
10 So we didn't want one of our members, you
11 know, spending a lot of money on something that,
12 you know, we didn't believe putting out there
13 because we wouldn't want them to put all their
14 money into making these and then all of a sudden
15 nobody buys them, right? And put them out of
16 business. It doesn't help NSSF to lose members
17 that way.
18 Q. I want to talk about how NSSF promoted
19 participation in this survey.
20 A. Sure.
21 Q. On this page it says at the top, with no
22 database available of known MSR owners,
23 NSSF promoted participation in this study via
24 online banner ads, on various websites, blogs and

Page 139

1 e-newsletters geared towards firearm ownership and
2 hunting, followed by a list.
3 Do you see that?
4 A. I do.
5 Q. And you were involved in the process
6 that's described in that sentence, right?
7 A. Yes.
8 Q. The first example listed is the AR15.com
9 e-newsletter. What is AR15.com?
10 A. So at the time -- and I'm not sure if they
11 even still exist today, but at the time AR15.com
12 e-newsletter was a very popular newsletter. And I
13 don't recall how many subscribers they had, but
14 that was a place where people would go for
15 information on modern sporting rifles.
16 And assuming that with the name AR15.com,
17 that looked like a really good place for us to
18 reach MSR owners to help take our survey and build
19 the responses so we could have a really reliable
20 data source for our members to use.
21 Q. At the time the survey was conducted did
22 AR15.com host forums for people to discuss MSR
23 ownership?
24 A. To the best of my knowledge, at one point

Page 140

1 I believe AR15 did have forums that discussed it.
2 But, again, ten years ago I couldn't tell you for
3 sure, but I do believe so.
4 Q. Do you know one way or the other whether
5 the population that visits AR15.com is
6 representative of the overall population of modern
7 sporting rifle owners in terms of their opinions
8 about those weapons?
9 MR. LOTHSON: Objection, form.
10 THE WITNESS: So one of the things that I
11 somewhat recall, again, going back ten years, was
12 working with Keith Story and Neil Schwartz of
13 Sports Marketing Surveys and saying we need to have
14 as well-rounded a sample as possible.
15 First of all, you can't go to like these
16 big conglomerates like a Dynata, now they're called
17 Experion, back in the day where you would, you
18 know, say I need a thousand completes of people
19 that have gone fishing. And they say okay. It's
20 not a high -- a low incident rate, so \$5 a
21 complete. It cost you \$5,000 to get it done.
22 There was -- we couldn't go to them and
23 say give us modern sporting rifles. It wasn't a
24 category.

Page 141

1 So we had to be a little on avant garde
2 or, you know, think out of the box. How are we
3 gonna get this? And it can't just come from
4 AR15.com because that is a skewed sample because
5 that is one mind set of people that go there. Now,
6 it's a nationwide group of people. It's not
7 regionalized or only available in one state. I
8 think AR15 was a nationwide website.
9 So we -- that's why we -- I think we have
10 a list of a dozen or so. You can see the other
11 organizations that we had there. So we felt really
12 comfortable. And I remember Neil and Keith saying
13 21,000 responses, I mean, it was -- they were
14 impressed. And these guys had done surveys a lot.
15 So that kind of helped me feel comfortable that
16 what we were producing was a very valuable
17 document.
18 BY MR. HAZINSKI:
19 Q. Do you know whether either Sports
20 Marketing Surveys or NSSF conducted any statistical
21 weighting to ensure that the survey respondents
22 were generally representative of the overall
23 population of MSR owners in the United States?
24 A. Not to my recollection. You know, I

Page 142

1 talked about before I know on several of our
 2 surveys we had done weighting. And I tried to be
 3 very clear about when weighting was done, we put
 4 that in the methodology. I don't see it here, so I
 5 would assume that we did not weight that.
 6 Q. I want to ask about another part of
 7 Page NSSF 5907. The final full paragraph says,
 8 this gives a very high confidence level. The
 9 confidence interval for the full MSR owner sample
 10 ranges from plus or minus 0.29 percentage points to
 11 plus or minus 0.68 percentage points at the
 12 95 percent confidence level.
 13 Did I read that correctly?
 14 A. Correct.
 15 Q. So you used the term confidence level
 16 before. So you have a familiarity with that term?
 17 A. Correct. And I think the next sentence or
 18 two kind of takes it a step further.
 19 Q. And that provides an explanation of what
 20 the application of that concept is with an example?
 21 A. Correct. And, you know, I think I talked
 22 about earlier the minimum confidence level we tried
 23 to strive for was a 95 and 5, but as you can see
 24 this was a 95 and 0.5 which is tight which means

Page 143

1 it's very solid.
 2 And, again, ten years ago I remember those
 3 guys being impressed, and that's what they did for
 4 a living. They're like that's pretty solid stuff.
 5 So I was happy to put this report out.
 6 Q. Do you know how the confidence level and
 7 this margin of error were specifically calculated
 8 for this report?
 9 A. So it either would have been that same
 10 formula -- and I had just a website. You plug in,
 11 you know, sent to whatever X amount of people. But
 12 I'm assuming under this one since I contracted out
 13 this job that Keith and Neil would have been the
 14 ones to supply that information.
 15 Q. Confidence levels in statistics are
 16 determined in part by comparing the size of the
 17 sample to the size of the overall population from
 18 which that sample is taken, right?
 19 A. Yeah, there's several different variations
 20 of confidence level, but that's one understanding
 21 of it. You know, there's no -- unfortunately, no
 22 survey, even the U.S. Census, you now,
 23 hundred-million-dollar surveys that are going to
 24 get you a hundred percent confidence and zero

Page 144

1 margin of error, right?
 2 So there's always some sort of confidence
 3 level, but pretty much across the board -- and I
 4 used to go to, you know, Quirks which is direct
 5 marketing, you know, conferences. Across the board
 6 from Google to Apple to Microsoft, 95 and 5 was a
 7 pretty standard confidence level to get.
 8 Q. For the purposes of this report did either
 9 NSSF or Sports Marketing Surveys estimate the total
 10 number of modern sporting rifle owners in the
 11 United States?
 12 A. Not to my recollection. We may have done
 13 so. I know we had the numbers there that we could
 14 have identified that, but I don't recall.
 15 MR. LOTHSON: Why don't we take a break for a
 16 seconds?
 17 MR. HAZINSKI: Sure.
 18 (WHEREUPON, a short recess was
 19 taken.)
 20 MR. HAZINSKI: We're back on the record. It's
 21 a few minutes shy of 2:15 p.m.
 22 BY MR. HAZINSKI:
 23 Q. Mr. Curcuruto, we were talking about
 24 NSSF 5907 and the 95 percent confidence level and

Page 145

1 that margin of error, those figures there.
 2 Do you agree that in order to assess the
 3 confidence level associated with a particular
 4 sample that you need to know or accurately estimate
 5 the size of the underlying population from which
 6 the sample is taken?
 7 MR. LOTHSON: Objection, form, incomplete
 8 hypothetical.
 9 THE WITNESS: Yeah, there's -- from my
 10 understanding the confidence level can be looked at
 11 a couple different ways. One, with a known
 12 quantity of, okay, we're gonna send this out to a
 13 thousand retailers or we're gonna send this out to
 14 the general population without knowing that.
 15 So either way, you know, you can still
 16 form a pretty solid confidence level on either way
 17 you do that. And I believe in this case here, like
 18 I recall, the folks at Sports Marketing Surveys
 19 were impressed with how strong a confidence there
 20 was in this report.
 21 BY MR. HAZINSKI:
 22 Q. Did anyone at Sports Marketing Surveys in
 23 the course of the preparation of this report ever
 24 inform you that they were relying on an estimate of

Page 146

1 the total number of MSR owners in the United
2 States?
3 A. Unfortunately, I don't recall. I'm not
4 sure how, you know, that final 95 and 0.29 was
5 calculated.
6 Q. Hypothetically, do you agree that a sample
7 size of 2,000 -- 21,942 would generate a different
8 confidence interval if the underlying total
9 population of MSR owners was 500,000 versus
10 50,000,000?
11 MR. LOTHSON: Objection, form, compound,
12 confusing.
13 THE WITNESS: So kind of what we talked about
14 before, the smaller the sample size, you need a
15 higher completeness, right? So once you get out
16 past -- it could be 320,000,000 people that live in
17 the United States. There's a number that
18 doesn't -- you know, once I get to 10,000, making
19 this up, it doesn't matter if you get to
20 300,000,000. There's not gonna be a change in the
21 data.
22 I've actually seen it firsthand. Because
23 what we do is print out reports. Say after a
24 thousand responses, here's the answers. After

Page 147

1 10,000 responses, here's the answers. And there's
2 not much fluctuation. So that's where that, you
3 know, 0.29 comes into play. So, you know, my
4 experience is very, very happy with this study of
5 21,000 responses.
6 BY MR. HAZINSKI:
7 Q. Is it your opinion that the sample size of
8 over 21,000 responses reported here is sufficiently
9 large that no matter what the underlying total
10 population of MSR owners is would not affect the
11 confidence level?
12 A. So, again, to the best of my knowledge
13 whether it was 7,000 responses in the first one,
14 the 20,000 responses, both I felt very confident in
15 putting a report out to our members so they could
16 make that well-informed business decision.
17 Q. You expressed that you felt positively
18 about the small margin of error, 0.29 percent and
19 0.68 percent, estimated here.
20 Do you believe that those numbers could
21 vary depending on the size of the underlying
22 population of total MSR owners?
23 A. Kind of what -- the last answer we talked
24 about there. It's my belief that there's not gonna

Page 148

1 be that much fluctuation. Again, I've seen it
2 firsthand several times about. Once you get to a
3 certain number, you know, the percentages of change
4 in that overall response is minimal.
5 Q. I'd like you to turn to the next page
6 which is Page 5, NSSF 5908, and specifically to the
7 third to final paragraph.
8 A. Okay.
9 Q. Begins, 35 percent reported, referring to
10 the survey respondents, 35 percent reported having
11 either military or law enforcement background.
12 This is down from the 44 percent reported in 2010.
13 Although the veteran status has increased slightly,
14 the 2013 survey seemed to tap more into the
15 civilian MSR population.
16 Did I read that correctly?
17 A. Correct, yes.
18 Q. What does it mean that the 2013 survey
19 tapped more into the civilian MSR population?
20 A. So going back, you know, ten years ago, to
21 the best of my recollection one of the questions
22 that we wanted to ask to get a better feel for who
23 owned modern sporting rifles was did they have
24 military background, did they have a law

Page 149

1 enforcement background.
2 We felt that was very valuable to our NSSF
3 members to know, for example, for marketing
4 purposes or what not. They, you know, may be able
5 to generate different ads specific to what the
6 average consumer looks like.
7 So I think that's an important to ask -- a
8 question to ask there to have that knowledge of who
9 owns the modern sporting rifles at that snapshot in
10 time.
11 And according to that response there, it
12 looks like there was a sift in the marketplace a
13 little bit. So, again, if you're a marketer, you
14 might be able to use that for better marketing
15 purposes.
16 Q. So I'm not going to have this formulated
17 as a very clear question, so please bear with me as
18 I try to articulate it. I guess I want to
19 understand what this sentence is actually saying.
20 It sounds from your last answer that you
21 interpret this to say that this is reflecting a
22 change in the composition of who actually owns MSRs
23 in the market, right?
24 A. I'm gonna read it myself, sorry.

Page 150

1 So from my recollection of reading it now,
 2 what I assume, you know, that we were trying to get
 3 out was this was a point, because it is in the
 4 executive summary, that stood out as important to
 5 know.
 6 So as you saw, there was a lot of
 7 information within this report, but the executive
 8 summary maybe points out some of the key things to
 9 take a look at in more detail as the readers review
 10 in the report.
 11 Q. The contrast I'm trying to draw out in my
 12 question is whether this difference of 44 percent
 13 down to 35 percent as a reduction according to the
 14 findings of this survey, whether that reduction
 15 reflects, according to the findings, a change in
 16 the proportion of veteran MSR ownership or a change
 17 in survey response rates, in other words, a change
 18 in who happened to be answering the questions.
 19 Do you understand what I'm asking?
 20 MR. LOTHSON: Objection, compound, confusing.
 21 THE WITNESS: Okay. So I'll try to answer that
 22 the best I can. So, again, with high confidence
 23 levels, you know, both ways around, we kind of
 24 talked about how my -- I feel that it's a very

Page 151

1 well-represented sample and so did Sports Marketing
 2 Surveys at the time.
 3 So this particular data point, one of many
 4 within the report, stood out as we were writing
 5 this executive report, something to let the reader
 6 know about. So as I think about it now, if the
 7 report says in 2010, 44 percent of people
 8 responding had a military or law enforcement
 9 background and now three or four years later
 10 35 percent of them do, that could tell me, okay, so
 11 the market has potentially shifted to more
 12 consumers, non-law enforcement veterans that now
 13 own these.
 14 So if I were to, you know, look to where
 15 to market a product, I might say, okay, I'll focus
 16 now on the growing consumer, nonmilitary,
 17 non-law enforcement background as a potential way
 18 to advertise.
 19 BY MR. HAZINSKI:
 20 Q. How would you know on the basis of these
 21 survey results whether the change from 44 percent
 22 to 35 percent was attributable to an actual change
 23 in market conditions as opposed to a change in
 24 survey response rates from certain groups?

Page 152

1 A. So, again, I believe with a strong
 2 confidence level in the 2010 and the 2013, it's
 3 very reasonable for myself or an NSSF member to use
 4 this data to make business decisions.
 5 And, you know, what I get from reading
 6 that there is that it looks like over the course of
 7 between 2010 and 2013, more consumers were
 8 purchasing modern sporting rifle that did not have
 9 a law enforcement or military background.
 10 Q. Are you aware of any statistical weighting
 11 techniques that were used in the preparation of
 12 this report specifically with respect to the
 13 prevalence of firearm ownership among veterans?
 14 A. Again, going back ten years, I don't
 15 recall if we put any weighting on this. As I
 16 stated before, when we typically weight, we try to
 17 put it somewhere within the report.
 18 So I don't see it, but it may be in here.
 19 But if it's not in here, we most likely did not
 20 weight.
 21 Q. At the time this report was finalized and
 22 sent to you by Sports Marketing Surveys, did you
 23 express any concerns about any of the methodologies
 24 that Sports Marketing Surveys had used?

Page 153

1 A. I don't recall doing that. I recall being
 2 pretty darn happy with the product we created,
 3 yeah.
 4 Q. Do you recall expressing any concerns
 5 about the accuracy of any of Sports Marketing
 6 Surveys findings?
 7 A. Within this report?
 8 Q. With respect to this report.
 9 A. I mean, there's so many -- you know,
 10 because it's so comprehensive, and let's say there
 11 was dozens of questions, there may have been
 12 something that I questioned and said, hey, you
 13 know, the trend data in 2010 to '13, that doesn't
 14 make sense. Let's look into that further. But I
 15 can't recall if that was the case in any of these.
 16 Q. After this 2013 report was finalized, did
 17 you ever express to anyone at Sports Marketing
 18 Surveys or alternatively to anyone at NSSF that
 19 methodologies for future consumer surveys should be
 20 modified?
 21 A. To the best of my recollection, at the
 22 time I would have been very happy with everything
 23 that happened in this. So there was probably no
 24 concerns about how we should make an immediate

Page 154

1 shift to a different methodology, you know.
 2 And some of our vendors used different
 3 methodologies, and, you know, everybody says their
 4 own methodology is the best. But, you know, we
 5 wanted to use this particular methodology with this
 6 survey, and we were happy with the results.
 7 MR. HAZINSKI: Okay. You can set this exhibit
 8 to the side for now, please. I will distribute
 9 Exhibit 7.
 10 (WHEREUPON, Curcuruto Deposition
 11 Exhibit No. 7 was marked for
 12 identification.)
 13 BY MR. HAZINSKI:
 14 Q. This is a document with the Bates range
 15 NSSF 100 through 180, and this is a document called
 16 Modern Sporting Rifle Consumer Comprehensive
 17 Report, correct?
 18 A. Correct.
 19 Q. The last -- the very last page of this
 20 document, NSSF 180, has a copyright of the year
 21 2022. Do you see that?
 22 A. Correct.
 23 Q. So I might call this the 2022 consumer
 24 survey --

Page 155

1 A. Okay.
 2 Q. -- in comparison to the 2013.
 3 Do you understand when I say that?
 4 A. Sure.
 5 Q. Have you seen this 2022 consumer survey
 6 report before?
 7 A. I recall hearing -- so I believe one of
 8 the things I worked on prior to my departure was
 9 the development of this, but I don't think it ever
 10 got in the field and certainly not the report
 11 created when I was still there.
 12 And I believe after I left NSSF, I
 13 remember seeing a press release that the study was
 14 out, but I was knee deep in, you know, getting
 15 Outdoor Stewards of Conservations off the ground.
 16 So I never took a detailed look at this study
 17 unfortunately.
 18 Q. Did NSSF ever issue any other versions of
 19 its consumer survey report between the years 2013
 20 and 2022?
 21 A. On the modern sporting rifle?
 22 Q. Right.
 23 A. I don't believe so through Sports
 24 Marketing Surveys. I know, you know, throughout

Page 156

1 the years we had updated that chart on the number
 2 of MSRs and probably put out bits of information
 3 here and there.
 4 But I believe when I was there it only had
 5 been conducted in '10 and '13, and then I recall
 6 doing it again to have that, oh, ten years has
 7 passed by, let's see where we are type of thing.
 8 But it wasn't completed during my tenure there.
 9 Q. Do you know whether Sports Marketing
 10 Surveys also conducted this report?
 11 A. I believe so. I see, you know,
 12 potentially Page 2 or NSSF 101, it does have the
 13 Sports Marketing Surveys' information. So I'm
 14 assuming that that's who conducted it.
 15 Q. Were you responsible for the decision to
 16 bring them on to do the 2022 version of this
 17 report?
 18 A. I was responsible to bring them back to do
 19 a version -- were probably going to do it during
 20 2020, but I -- from what I recall it was delayed
 21 most likely due to COVID. Because there was crazy
 22 buying at the time, and there was like -- it
 23 wouldn't have been like a true representation of
 24 what's going on in the market. Everybody's buying

Page 157

1 everything during COVID, right? Guns couldn't be
 2 kept on the shelves.
 3 So I think one of the reasons why it
 4 didn't go out in 2020 while I was there was because
 5 the market was kind of crazy, and it wouldn't have
 6 been a representative snapshot in my opinion. So
 7 we delayed it. And then of course, you know, after
 8 I left is when -- it looks like it went out in
 9 potentially July of '22. This looks like the stamp
 10 on the back page.
 11 Q. When you contacted Sports Marketing
 12 Surveys to conduct this updated survey, was it your
 13 intention for them to apply essentially the same
 14 methodology they used in the 2010 and 2013 reports?
 15 A. Right. And so ten years had passed.
 16 Methodologies changed slightly. But from my
 17 recollection, I wanted -- you know, we had
 18 discussions or at least from my recollection we had
 19 discussions about making sure the trend analysis
 20 could be true.
 21 Like even if they changed the methodology
 22 a little bit, we wanted to make sure they tested
 23 that change between what they used to do and what
 24 they did do if they made a change. So that way the

Page 158

1 responses from '10 and '13 could be then used as
 2 trend data from '22 or whatever the case was.
 3 So that was very important to be able to
 4 have trend data that was reliable no matter the
 5 methodology.
 6 Q. So in the 2013 report -- well, let me ask
 7 this with respect to a specific page.
 8 Could you turn to Page 10 of the report
 9 which is NSSF 109?
 10 A. Okay.
 11 Q. Could you read this page to yourself and
 12 just let me know when you're done?
 13 A. Okay. I'm done.
 14 Q. Based on this description of the
 15 methodology, do you perceive any differences in the
 16 way this survey was conducted compared with the
 17 survey underlying the 2013 report?
 18 A. So the first thing that stands out to me
 19 is it looks like, if my memory serves me right,
 20 they didn't put it out there due to COVID, which is
 21 good, and personnel changes.
 22 Second thing that stands out to me is in
 23 the first sentence of the second paragraph, the
 24 online survey covered various aspect of MSR

Page 159

1 ownership behaviors and attitudes. The NSSF
 2 promoted survey via a partner email distribution
 3 list.
 4 So I think that differs a little bit
 5 about, you know, the methodology we had done
 6 ten years ago. And, again, methodologies change
 7 over time. So I'm not saying there's anything
 8 wrong with this at all, but it is -- looks
 9 different than what we had done ten years prior.
 10 Q. Okay. The bottom of this page has some
 11 information that says, completed surveys 2,421.
 12 Below that it says, usable responses for analysis,
 13 2,185.
 14 Do you see that?
 15 A. Correct.
 16 Q. That's significantly less than the number
 17 of usable responses for the 2013 report, correct?
 18 A. Correct.
 19 Q. This methodology states that the aim is to
 20 provide the NSSF and manufacturer's insights on
 21 current consumer needs and the uses of MSRs as well
 22 as educate those influencing public policy in the
 23 effort to preserve our constitutional rights.
 24 Do you see that there?

Page 160

1 A. Correct. Yep.
 2 Q. The stated purpose of gathering
 3 information about consumer needs and uses of modern
 4 sporting rifles, was that also a purpose underlying
 5 the 2013 report?
 6 A. I don't believe that was the exact purpose
 7 of the other one. So you had said -- so the
 8 purpose -- okay. The first part of it, NSSF and
 9 manufacturer insights on current consumer needs and
 10 uses, that was a big function of us in 2013 as well
 11 as educate those influenced by public policy.
 12 So that is different, you know, than what
 13 I had done in 2013 probably due to, you know, shift
 14 in the marketplace.
 15 Q. So I want to drill down on that.
 16 A. But I -- I'm sorry. I've cut you off.
 17 But I did not have anything to do with writing of
 18 that.
 19 Q. Understood. And my question is really
 20 about the 2013 report. I just want to use this as
 21 a comparison point.
 22 So the part where it says the aim is to,
 23 ellipses, educate those influencing public policy
 24 in the effort to improve our constitutional rights,

Page 161

1 was that also a purpose underlying the 2013
 2 consumer survey report?
 3 A. Going back ten years, I know our primary
 4 purpose -- our main focus was to provide
 5 information to NSSF members.
 6 Now, are some NSSF members -- were some
 7 NSSF members policy folks at the time? Probably.
 8 But my individual focus -- my personal focus was to
 9 have that for our members.
 10 Again, back then there wasn't as much
 11 public policy that was being done at NSSF in 2013
 12 that there's now being done there, so there may
 13 just be an internal shift to that and maybe that's
 14 why they added that.
 15 MR. HAZINSKI: You can set this exhibit aside.
 16 I'll give you the next exhibit which is
 17 Number 8.
 18 (WHEREUPON, Curcuruto Deposition
 19 Exhibit No. 8 was marked for
 20 identification.)
 21 MR. HAZINSKI: This is a document titled
 22 National Shooting Sports Foundation Modern Sporting
 23 Rifle Online Study, for the record Bates range NSSF
 24 181 through 197.

Page 162

1 BY MR. HAZINSKI:
 2 Q. Now, you may not have seen this specific
 3 document before, but are you generally familiar
 4 with what type of document this is?
 5 A. Give me one minute to review it real
 6 quick. Sorry.
 7 Q. So have you had a chance to flip through
 8 it?
 9 A. I have. Thank you.
 10 So this type of document here is just a
 11 Word format of a survey questionnaire. I don't
 12 know if this is final or not. But sometimes
 13 with -- many times with surveys if you have an
 14 online link and you take -- a respondent takes the
 15 survey questionnaire, if they answer a certain
 16 question one way, they'll be redirected to one
 17 answer. If they answer a question another way,
 18 they'll be redirected to another way.
 19 Having a paper survey is one way to easily
 20 track the survey questions. We call it logic where
 21 if you said yes to question one, you get question
 22 two. If you said no to question one, you get
 23 question three. Sometimes it's easier to look on
 24 paper than it is on . . .

Page 163

1 Q. Does the final version of this type of
 2 document list all of the questions that could
 3 potentially be posed to survey respondents for
 4 purposes of consumer surveys?
 5 A. So I wouldn't know about this particular
 6 document, but documents similar to this that I
 7 worked on had a lot of iterations. So much so that
 8 sometimes my client would get -- or my vendor would
 9 get mad at me for making changes. You know, like
 10 just pick the thing.
 11 So, for example, when we had a final
 12 version, 7.6, Version 7.6, when it was final,
 13 that's what then went into the online survey
 14 questionnaire and then out to folks.
 15 So I don't know again if this is the
 16 final, you know, version that they used for the
 17 '21, '22 survey.
 18 Q. The first page of this document on
 19 NSSF 181 includes a few paragraphs of text at the
 20 beginning.
 21 Is this text typically statements or
 22 information that is shared with survey respondents
 23 that they can see as they begin filling out the
 24 survey?

Page 164

1 A. I'm just gonna take a look through it real
 2 quick.
 3 Okay. So after taking a quick look at the
 4 introductory on Page 1, NSSF 181, it looks to me
 5 like this would be the introductory copy or text
 6 that a respondent would get or a potential
 7 respondent would get.
 8 Sometimes we create a landing page that
 9 would -- you know, if you click on a banner, it
 10 would bring you to a landing page with entry text
 11 like this explaining what the survey was.
 12 As time passed on and you have direct
 13 emails, somebody gets an email. They click on that
 14 email. This would be kind of like a landing page.
 15 It's the first thing they'd see before taking the
 16 survey to determine, okay, that's me. I'll take
 17 this. I have time. That type of thing.
 18 Q. I would like to direct your attention to
 19 the second paragraph. The second sentence says,
 20 insights will be used to help educate those
 21 influencing public policy in the effort to preserve
 22 our constitutional rights.
 23 Do you see that?
 24 A. I do.

Page 165

1 Q. Was that statement or any statement
 2 similar to that made to survey respondents for the
 3 2013 consumer survey report?
 4 A. To the best of my recollection, I do not
 5 believe so. Again, our focus back 2013, ten years
 6 ago, was to make sure our members could have this
 7 data and use it as they see fit.
 8 Again, were there politically insight
 9 folks that used that data in 2013? Probably, but I
 10 don't recall ever putting anything specific in the
 11 language to our introduction to the 2013 survey.
 12 Q. From your time working at NSSF, do you
 13 have an understanding of how NSSF could use survey
 14 results to influence public policy?
 15 A. So just repeating that. Do I have an
 16 understanding of how NSSF would use survey results
 17 to influence public policy? So, again, to my
 18 recollection I never personally, you know, got
 19 involved in that, putting, you know, instructions
 20 on consumer surveys like that.
 21 Anecdotally or just in my mind, so for
 22 example, here we are today, right? So potentially
 23 this data is now being used in a case to -- let me
 24 get the verbiage here -- to educate those

Page 166

1 influencing public policy, does that make sense?
 2 Q. From the perspective of ensuring that
 3 surveys have a reliable methodology, do you have
 4 any concerns about including this or similar
 5 language at the beginning of a survey?
 6 MR. LOTHSON: I'll object just to the extent
 7 he's not an NSSF 30(b)(6) witness. He's here to
 8 testify to his individual capacity. This is a 2021
 9 survey. I think it's beyond the scope of this
 10 deposition in his individual capacity.
 11 MR. HAZINSKI: You can set this exhibit to the
 12 side. This will be Exhibit 9.
 13 (WHEREUPON, Curcuruto Deposition
 14 Exhibit No. 9 was marked for
 15 identification.)
 16 MR. HAZINSKI: For the record, Bates stamp
 17 NSSF 3967 through 3985.
 18 BY MR. HAZINSKI:
 19 Q. Mr. Curcuruto, have you seen this document
 20 before?
 21 A. So I believe Mr. Vogts had sent me an
 22 email with several NSSF emails like this, but I
 23 assume that this is pretty much what was sent to me
 24 in one of those emails.

Page 167

1 Q. This appears to be an email from someone
 2 named Adam Hile, H-I-L-E, to you from -- dated
 3 November 20, 2022, correct?
 4 A. Correct.
 5 Q. And who is Adam Hile?
 6 A. It looks like he's an employee of Sports
 7 Marketing Surveys USA. And I see that Keith was
 8 copied on this as well. I recall Keith being my
 9 primary contact, and I'm sure I had worked with
 10 Adam in some capacity as well.
 11 Q. Do you know what Adam Hile's role was at
 12 Sports Marketing Surveys?
 13 A. Off the top of my head I would have never
 14 been able to tell you, but just looking at the
 15 email I see his title is senior research analyst.
 16 Q. Do you have any recollection of what his
 17 involvement was in the process for creating the
 18 2022 consumer survey report to the extent you were
 19 involved in that as well?
 20 A. So to the best of my recollection, what
 21 makes sense is Adam -- seems to be he would have
 22 been a programmer. I think as you in the
 23 attachment it says, NSSF survey V5. So we're
 24 already on V, Version, 5. And there was probably

Page 168

1 several other versions after this before it went to
 2 the field.
 3 Q. So I want to direct your attention to the
 4 attachment to this document. It starts on the
 5 second page, NSSF 3968.
 6 Do you see that?
 7 A. Correct.
 8 Q. And this is the attachment to the email
 9 that was addressed to you, right?
 10 A. Correct.
 11 Q. And this attachment on the first page
 12 includes language in the second paragraph that
 13 says, insights will also be used to help educate
 14 those influencing public policy in the effort to
 15 improve our constitutional rights, correct?
 16 A. Second paragraph, last sentence?
 17 Q. Right.
 18 A. Correct.
 19 Q. Was it your typical practice at NSSF to
 20 review drafts of documents like these prepared by
 21 Sports Marketing Surveys?
 22 A. It was, yeah. Certainly before a final
 23 document went out.
 24 Q. Do you recall telling anybody, whether at

Page 169

1 NSSF or Sports Marketing Surveys, about any
 2 concerns regarding the sentence, insights will also
 3 be used to help educate those influencing public
 4 policy in the effort to preserve our constitutional
 5 rights?
 6 A. Unfortunately, I don't have any
 7 recollection of that. It doesn't stand out as I
 8 sit here today as anything alarming. So I'm not
 9 sure I would have been alarmed if reading it during
 10 this Version 5.
 11 Q. As you sit here today, do you believe that
 12 telling survey respondents that their results might
 13 be used to influence firearm policies could affect
 14 the reliability of the survey results?
 15 A. I don't. I don't see how a respondent
 16 would answer a question if they own, you know, such
 17 as if they own a modern sporting rifle or, you
 18 know, how much they bought it for, I don't see how
 19 they would shift their responses because it says,
 20 you know, that sentence on there.
 21 Q. After reviewing this language did you take
 22 any additional steps to ensure that the inclusion
 23 of this language would not skew or bias the data?
 24 A. After reviewing it, you know, back in

Page 170

1 November 2020, I knew it wasn't a complete version.
 2 So obviously I don't see any notes on it. It
 3 wasn't something that we had thought was an issue
 4 or to change.
 5 Q. The language in this paragraph -- the
 6 organization of the language in this paragraph
 7 we've been discussing actually differs slightly in
 8 this version as compared with the final version of
 9 the -- I shouldn't say final. Let me strike that
 10 question and ask it a new way.
 11 The organization of the language in the
 12 second paragraph on NSSF 3968 differs somewhat from
 13 the organization of the language in the second
 14 paragraph on NSSF 181, correct?
 15 A. Yeah. For example, the second paragraph
 16 on 181, it says, insights will be used. And on
 17 that second sentence, second paragraph, on 3968,
 18 the results of the study will help.
 19 So, yeah, there appears to be some
 20 differences. And I'm not sure. Is 181 Version 6?
 21 Version 5? Version 4? Are you aware of that? I'm
 22 not sure.
 23 Q. Well, the footer on NSSF 3968 says
 24 NSSF MSR 2020 survey, compared to the footer on

Page 171

1 NSSF 181, for example, says NSSF MSR 2021 survey,
 2 right?
 3 A. Correct, which would indicate that it's a
 4 later version and potentially one -- most likely
 5 one that I was not involved with, I believe.
 6 Q. And comparing the second paragraph on each
 7 of these pages in what seems to be the earlier
 8 version of this document, the sentence regarding
 9 the effort to preserve our constitutional rights is
 10 later, whereas on NSSF 181 it's put before the
 11 following sentence about consumer wants, needs and
 12 uses, right?
 13 A. Correct. On 968, insights will also be
 14 used comes after the results of the study, whereas
 15 on 181, insights will be used comes before the
 16 results in the study.
 17 Q. Do you know who made the decision to
 18 switch that order?
 19 A. I do not.
 20 Q. I want to direct your attention to Page 18
 21 of this exhibit, NSSF 3985. At the top of this
 22 page it says feedback for Jim to consider.
 23 Do you see that?
 24 A. Correct.

Page 172

1 Q. Jim is you?
 2 A. Yes. Yes, sir.
 3 Q. Do you know who wrote the feedback for you
 4 to consider?
 5 A. Just give me one second to read it.
 6 So just after reviewing it, my assumption
 7 is the feedback came from Adam or Keith from Sports
 8 Marketing Surveys.
 9 Q. I want to direct your attention to about
 10 halfway down the page. Do you see where it says,
 11 getting back to the self-defense issue?
 12 A. Correct.
 13 Q. I'll read there.
 14 Getting back to the self-defense issue
 15 concerning MSRs, here are a couple questions we
 16 would really like to see added.
 17 And then there are some questions listed
 18 below. Are you with me?
 19 A. Okay.
 20 Q. The first question asks, if you awoke to a
 21 home invasion in the middle of the night, which
 22 type of firearm would you prefer to have available
 23 to effectively address the threat.
 24 Did I read that correctly?

Page 173

1 A. Correct.
 2 Q. The third question says, what type of
 3 firearm do you most commonly keep available for
 4 home defense.
 5 Did I read that correctly?
 6 A. Yes.
 7 Q. Do you see that there's a marginal comment
 8 on the right-hand side that says, will not be
 9 added?
 10 A. I do.
 11 Q. Do you know who wrote that comment?
 12 A. I'm not sure. And this is kind of -- none
 13 of this rings a bell because it's a couple years --
 14 four years old. But I see in the comments it says,
 15 parentheses, AH 34. So AH seems to be the initials
 16 of Adam Hile. So I would assume Adam wrote that
 17 comment.
 18 Q. In the course of your typical practices at
 19 NSSF, would you have been involved in making the
 20 decisions about whether to incorporate this type of
 21 feedback?
 22 A. Yep. For surveys like this, you know, I
 23 did the heavy lifting on it. When I was at the
 24 point we were at, you know, Version 6, 7 or 8, we

Page 174

1 were near the final version that I was comfortable
 2 with and ready to go with, we would -- I would do
 3 an internal review among some people, potentially
 4 like Larry Keen would take a look at this or
 5 somebody on the relations team. Because these were
 6 starting to be used more in court cases, so I
 7 wanted to make sure we had everything covered
 8 correctly.
 9 So, again, it appears that this version is
 10 not the completed version that went to field.
 11 Seems like potentially changes were made by
 12 somebody other than myself before it went into the
 13 field.
 14 Q. Do you recall who made the decision not to
 15 include the three questions listed on this page?
 16 A. Unfortunately, I don't recall. It may
 17 have been me. It may have been, you know, somebody
 18 else that I showed it to that said we don't need
 19 that question.
 20 One of the things that, you know, we were
 21 very aware of is survey fatigue. So, you know,
 22 back in 2013 you could get away with a 18 to
 23 20-minute survey that took that long to respond to.
 24 Ten years later you want to be more like, you know,

Page 175

1 8 to 10 or 15 max. And you want to shorten that
 2 because apparently people's attention spans have
 3 lowered over the past decade or so.
 4 So that was one of the reasons why. You
 5 know, we would love to ask every question we could,
 6 but just due do time constraints, you know, a lot
 7 of times we cut those out.
 8 Q. As you sit here today, do you have an
 9 independent recollection that the reason these
 10 questions were not included in the survey was to
 11 avoid survey fatigue?
 12 A. As I sit here today, that is the primary
 13 reason that comes to me because in all the surveys
 14 we did, we cut just about every single one of them
 15 down. We always had more questions to ask than we
 16 had time for.
 17 So that may have been a reason why some of
 18 these questions weren't added. And, again, I don't
 19 know if any of these questions made the final cut,
 20 you know, after I left there.
 21 Q. So when I ask you if you have an
 22 independent recollection, what I specifically want
 23 to know is whether you have a specific memory
 24 associated with the decision to include or exclude

Page 176

1 these questions rather than more generalized
 2 understanding of what you might have done or would
 3 have done.
 4 So phrased slightly differently, do you
 5 independently recall whether these questions were
 6 excluded from the survey specifically for the
 7 reason of avoiding survey fatigue?
 8 MR. LOTHSON: Objection, asked and answered
 9 and to the extent there was a question at the very
 10 end. If you have a different answer, go ahead.
 11 THE WITNESS: Okay. So I don't specifically
 12 recall why questions were kept out of the final
 13 draft, if they were kept out. I'm not sure, to be
 14 honest with you, if this question made it in the
 15 final survey.
 16 BY MR. HAZINSKI:
 17 Q. In the middle of the page, the beginning
 18 of the part that I read says, getting back to the
 19 self-defense issue concerning MSRs.
 20 Do you see that part?
 21 A. Correct.
 22 Q. What was the self-defense issue concerning
 23 MSRs?
 24 A. So I don't recall specifically four years

Page 177

1 ago this sentence out of the many things that was
 2 going on. But just sitting here today looking at
 3 it, it makes sense that the self-defense issue
 4 concerning MSRs would have most likely been about
 5 people -- consumers using a modern sporting rifle
 6 for self-defense.
 7 Kind of one of the things that we
 8 established in the 2010 and 2013 survey from my
 9 recollection was modern sporting rifles were used
 10 for a lot of different purposes from hunting big
 11 game, small game, varmint, to collecting, to target
 12 shooting, recreationally, competitive. And home
 13 defense I think was one of the primary reasons why
 14 people -- so it would make sense if that was a
 15 primary reason to kind of dig further into that
 16 topic.
 17 Q. Was NSSF interested -- as far as your own
 18 understanding, was NSSF interested in determining
 19 whether MSRs were commonly used for self-defense in
 20 the home?
 21 A. To the best of my recollection, I would
 22 think that NSSF would like to know as much as
 23 possible, as well as our members, what all the uses
 24 were for MSRs including home and self-protection.

Page 178

1 Q. Reading the first question listed on this
 2 sheet on NSSF 3985, and take a moment to review it
 3 if you like, do you believe that including this
 4 question would have provided NSSF with information
 5 about the -- about consumers' preferences for using
 6 modern sporting rifles for home defense?
 7 A. So I believe, you know, having this
 8 question asked in a survey -- and, again, I'm not
 9 sure if this one made it to the final version or
 10 not -- it would give another data point to NSSF
 11 members using the insights gain, as well as NSSF
 12 staff to use to learn more about modern sporting
 13 rifle owners.
 14 Q. Do you agree that survey responses to this
 15 question or a similar question might indicate
 16 whether MSRs are a preferred weapon for home
 17 defense in comparison to the other listed
 18 categories of weapons?
 19 A. Yeah. So the way I read it, you know, I
 20 have a marketing background as well as some
 21 research and sales. So, for example, if the
 22 majority of responses came in that the primary
 23 firearm that I would use in a home invasion and
 24 2,000 people responded that it would be a shotgun

Page 179

1 or an AR, you can develop marketing campaigns and
 2 say, hey, protect yourself in home defense.
 3 And whether that person has a shotgun or
 4 has a modern sporting rifle, you're using insights
 5 gained to have better marketing campaigns to help
 6 relate to your customers.
 7 So if a customer's using that product, you
 8 want to -- you don't want to have a marketing
 9 campaign that says, you know, use your modern
 10 sporting rifle for, you know, protecting your boat
 11 or something like that when nobody says they're
 12 protecting their boat with a modern sporting rifle,
 13 but they're protecting their home. You could have
 14 that in your marketing campaign, if that makes
 15 sense.
 16 Q. Is the reason that NSSF decided to exclude
 17 the first and third questions on this page from its
 18 consumers survey that the answers might have
 19 suggested that modern sporting rifles are not in
 20 fact the weapon most -- the category of weapon most
 21 commonly preferred for home self-defense?
 22 MR. LOTHSON: I'll object. Again, he's not a
 23 30(b)(6). That deposition was a couple weeks ago,
 24 and he can answer in his own individual capacity.

Page 180

1 THE WITNESS: Sure. So, again, I don't know if
 2 these questions were or weren't included, but being
 3 an insights guy I want to ask a thousand questions,
 4 right? I want to have as much data as I can so
 5 that way I can make a great decision later.
 6 So if it was up to me, I'd ask a lot more
 7 questions than, you know, we were able to in the
 8 time, but we knew that we couldn't ask that many
 9 questions.
 10 MR. HAZINSKI: Give me just a moment here.
 11 THE WITNESS: Of course, yeah, yeah.
 12 MR. HAZINSKI: All right. Thank you,
 13 Mr. Curcuruto. I don't have any other questions
 14 for you.
 15 MR. LOTHSON: I just have a couple.
 16 EXAMINATION
 17 BY MR. LOTHSON:
 18 Q. Back to Exhibit -- the large exhibit of
 19 the spreadsheet, AB 23, NSSF 2351. I'm not sure
 20 what number that was. Exhibit 3, if you return to
 21 that, either seventh or eight page where there was
 22 a comment box discussed, keep going. That page
 23 right there.
 24 It's a comment from you, Jim Curcuruto,

Page 181

1 wherein it talks about 75 percent of total MSRs
 2 slash AK made in U.S., but not sure if all are AK.
 3 Need to contact.
 4 Do you see that?
 5 A. Correct.
 6 Q. Okay. Did the 75 percent number come from
 7 the manufacturer?
 8 A. I think we discussed this earlier. The
 9 process was, yeah, to get as many responses as
 10 possible from the manufacturer.
 11 So to the best of my recollection, you
 12 know, I had saw the 90 and 45, wasn't sure of it.
 13 Contacted the manufacturer, and they gave me the
 14 75 percent, which I believe John -- Mr. John had
 15 said was the 108,000. That's what's plugged in. I
 16 forgot what number that was in.
 17 Q. AB 23, I believe.
 18 So 75 percent of 144,000 was represented
 19 to be 108,000; is that right?
 20 A. Oh, is 108 -- again, I don't have a
 21 calculator, but that would make sense if I had
 22 144,000 total. I called up the manufacturer. They
 23 said you can apply 75 percent to that. 144,000
 24 times 75 percent is 108. If that's what's plugged

Page 182

1 in, so kind of corroborates I think what we talked
 2 about earlier.
 3 MR. LOTHSON: That's all the questions I have
 4 for now.
 5 MR. HAZINSKI: Just a little follow-up on that.
 6 FURTHER EXAMINATION
 7 BY MR. HAZINSKI:
 8 Q. How do you know the 75 percent number came
 9 from a manufacturer?
 10 A. You know, like we talked about earlier, to
 11 the best of my recollection -- and I did this
 12 report over a lot of years. Unfortunately, I
 13 haven't done it -- well, fortunately, I haven't
 14 done it over the past several years.
 15 But the method I used was, you know,
 16 either knowing the manufacturer and knowing that
 17 their entire product mix was MSR, plugging that
 18 number in. The second thing would be to check out
 19 the website, and then third thing to contact them.
 20 According to this note, it looked like I
 21 need to contact them. And then 75 percent, high
 22 probability that the manufacturer told me that
 23 that's the number. I wouldn't have made up
 24 75 percent.

Page 183

1 Q. What you documented in this comment box,
 2 and for the record we're back at the comment for
 3 Cell AB 23. At the end you documented going to use
 4 90K to be safe as no response from company, right?
 5 A. Correct. And, you know, the way I read
 6 that when we talked about that before, it almost
 7 looks like, you know, that was a comment in there.
 8 And then the most recent comment, 75 percent are
 9 total.
 10 So in my mind it would have been, okay, I
 11 didn't know. I found out it was 75 percent,
 12 plugged that note in. And then that's kind of
 13 shown by plugging in the 108 in the chart there.
 14 I just wouldn't have plugged in a number
 15 that I didn't get from the manufacturer in the
 16 chart. We kind of referenced that before. If I
 17 didn't know it, I'd put a zero in.
 18 Q. You used the phrase in your last answer,
 19 the most recent comment.
 20 What did you mean by that?
 21 A. So I'm going to read that entire comment.
 22 So the very first part of the comment seems like it
 23 would have -- you know, I might have made the
 24 comment, 75 percent of total MSRs made in U.S., but

Page 184

1 not sure if all are AK, need to contact
 2 manufacturer.
 3 So I would think the most recent portion
 4 of that is the 75 percent are total MSRs. Again,
 5 when that comment was made 2016, I believe. Again,
 6 from what I can recall, I'm not gonna plug in a
 7 number unless the manufacturer told me that.
 8 So as I'm sitting here today, I would say
 9 the high probability the manufacturer gave me that
 10 75 percent.
 11 Q. So your testimony is that because it
 12 appears first in the comment, the 75 percent number
 13 is the last information that you entered in the
 14 comment box?
 15 MR. LOTHSON: Objection, asked and answered.
 16 BY MR. HAZINSKI:
 17 Q. Just want to be clear.
 18 A. Sure. So going back to my previous
 19 response and to clarify, I wouldn't have plugged in
 20 any number without getting a solid response from
 21 the manufacturer.
 22 So as I'm sitting here today, the 108,000
 23 that we plugged into AB 23 in my opinion would have
 24 come directly from the manufacturer, and that's

Page 185

1 that 75 percent that's in the comment box.
 2 Q. The second sentence or clause in this
 3 comment says, need to contact?
 4 A. Correct.
 5 Q. When relatively to the other language in
 6 this comment was that written?
 7 A. Again, we're talking about, you know,
 8 2016. So to the best of my recollection, I would
 9 have made a note, need to contact. Contacted them,
 10 found out, put the 108 in. There's no other
 11 process that, you know, that existed. I need to
 12 contact, and then I put it without contacting them.
 13 I would never put in the 108. It just makes no
 14 sense.
 15 As we discussed before, we want to make
 16 sure that we're putting out a product that is
 17 something that our members could use and also err
 18 on the side of caution. We don't want to inflate
 19 the number to have manufacturers, you know, think
 20 differently. We would rather have it err on the
 21 side of caution in most cases.
 22 Q. The part of this comment that says, no
 23 response from company, is that accurate today?
 24 MR. LOTHSON: Objection, form.

Page 186

1 THE WITNESS: So I wouldn't have wrote it if I
 2 didn't get a response. So to me that means in 2016
 3 I saw the numbers. I wanted to clarify. I
 4 originally called them. I got no response from
 5 them. You know, originally made that comment, went
 6 back.
 7 We didn't just say, oh, we tried once and
 8 we gave up. We kept trying and then finally heard
 9 from somebody that said 75 percent, 144 times
 10 75 percent, that 108 which is the number that we
 11 plugged in.
 12 BY MR. HAZINSKI:
 13 Q. Are you aware of any documents or other
 14 records reflecting or supporting your claim that
 15 the 75 percent number came from the manufacturer
 16 directly?
 17 A. I am not aware of any others, no.
 18 Q. So the only indication that that would be
 19 true would be based on your interpretation of
 20 what's recorded in this box; is that fair?
 21 A. On top of the comments also my process. I
 22 mean, I know my process. As you can see I did this
 23 report for many years, and the process, you know,
 24 is not a complex one. There's no way I would have

Page 187

1 entered a number without having a very reliable
 2 response on it.
 3 Q. And part of that process involved, at
 4 least in some cases, looking at manufacturer
 5 websites to generate an estimate of what proportion
 6 of firearms that they offered for sale were in the
 7 category of modern sporting rifles, right?
 8 A. Correct.
 9 Q. Why was that part of your process?
 10 A. So if I did not know a manufacturer's
 11 product line, I'd go to their website. If their
 12 website was a hundred percent AR-15s, what we
 13 defined at the time as modern sporting rifles, I
 14 could take that number and plug it into the chart.
 15 If it wasn't, I would call the
 16 manufacturer and say, hey, you've got this number
 17 from the app or data. I see you've got a mix of
 18 product. Can you tell me what that percentage is?
 19 When I heard from that manufacturer, I
 20 plug it in. If I didn't hear from them as we
 21 talked about before, I'd err on the side of caution
 22 and plug in that zero.
 23 Q. Just one moment, please.
 24 A. Of course.

Page 188

1 Q. Is it your testimony that it was not your
 2 practice to examine manufacturer websites to arrive
 3 at initial estimates of what proportion of their
 4 rifles counted as MSRs to generate a preliminary
 5 estimate of MSR production?
 6 MR. LOTHSON: Objection, he's testified on this
 7 four different times. His testimony is what it is.
 8 Asked and answered. And you can have him read back
 9 his prior answers if you want. He can go ahead and
 10 answer it again for a fifth time if you want to.
 11 MR. HAZINSKI: We can go back to the first
 12 testimony or you can just answer.
 13 THE WITNESS: If you want to restate that
 14 because you kind of lost me, I do apologize. It
 15 was a long question that took a second to get out,
 16 so I kind of lost it.
 17 BY MR. HAZINSKI:
 18 Q. Strictly for my clarification.
 19 A. Sure.
 20 Q. I realize this was a long time ago, and
 21 I'm asking you to recall details from an earlier
 22 period.
 23 A. Sure.
 24 MR. LOTHSON: About something that happened

Page 189

1 ten years ago.
 2 MR. HAZINSKI: I'd ask you just to keep it to
 3 form. We're almost done.
 4 BY MR. HAZINSKI:
 5 Q. I understood your initial testimony on
 6 this subject that you gave today to be that you
 7 could examine manufacturer websites to determine
 8 whether 100 hundred percent or something less than
 9 100 percent of the rifles produced were in the
 10 category of modern sporting rifles; is that
 11 accurate?
 12 A. Correct. That was one of the criteria we
 13 used to plug in some numbers into the chart.
 14 Q. Is it your testimony that if there were
 15 fewer than 100 percent of modern sporting
 16 rifles -- strike that question.
 17 Is it your testimony that if fewer than
 18 100 percent of the rifles produced by a given
 19 manufacturer were not modern sporting rifles, that
 20 you would not document that information in this
 21 spreadsheet?
 22 MR. LOTHSON: Objection, form, asked and
 23 answered.
 24 THE WITNESS: So --

Page 190

1 MR. LOTHSON: Confusing, compound.
 2 THE WITNESS: I think I understand it. So
 3 that's not my testimony. So my testimony would be
 4 if I went to a website and not all products listed
 5 are what I considered under our definition of a
 6 modern sporting rifle, then I would contact that
 7 manufacturer with a number from the AFMER.
 8 Okay. I have 2300 as the number. Can you
 9 tell me how many of those 2300 are what you
 10 consider modern sporting rifle under this
 11 definition. They would say 2,000. I plug in
 12 2,000. But I wouldn't plug in a number without,
 13 you know, cooperation from a manufacturer if there
 14 was a mix of products that were both traditional
 15 and modern sporting rifle.
 16 MR. HAZINSKI: I have no further questions.
 17 MR. LOTHSON: Nor do I at the moment. And we
 18 will reserve signature.
 19 MR. MAAG: I actually do have a couple
 20 questions, very few, just to clarify some things.
 21 EXAMINATION
 22 BY MR. MAAG:
 23 Q. Sir, when you say modern sporting rifles,
 24 does that mean anything other than an AR-15 variant

Page 191

1 or an AK-47 variant?
 2 A. Did you just join?
 3 Q. No. I've been on for hours. I've just
 4 been keeping my mouth shut?
 5 A. You'd have to listen to all the previous
 6 responses. We covered that pretty substantially.
 7 Q. Well, for instance, would an M1 carbine be
 8 a modern sporting rifle?
 9 A. I'm sorry. What was the question?
 10 Q. Would an M1 carbine beam be a modern
 11 sporting rifle?
 12 A. I would have to do some research on that.
 13 Q. Would an Uzi variant be a modern sporting
 14 rifle?
 15 A. I would have to do some research on that.
 16 Q. All right. Well, the ultimate point of my
 17 question is, there's probably lots of models of
 18 semi-automatic firearms that are not included in
 19 the totals for modern sporting rifles; is that
 20 accurate?
 21 MR. HAZINSKI: Object to the form.
 22 THE WITNESS: Go ahead and ask that again. I'm
 23 missing a little something that came through.
 24

Page 192

1 MR. MAAG:
 2 Q. Sure. Is it fair to say that there are
 3 probably numerous makes and models of firearms,
 4 rifles, semi-automatic rifles that are not included
 5 in the definition of quote, unquote, modern
 6 sporting rifles?
 7 A. So to the best of my recollection, using
 8 the definition of modern sporting rifle in we've
 9 been talking about today, semi-automatic rifle, AR,
 10 AK platform capable of a detachable magazine,
 11 one-pull of the triggers, one round exposed, you
 12 know, that -- there is a specific group of firearms
 13 that would fall under that category, and there are
 14 plenty of other semi-automatic rifles that do not
 15 fall under that definition.
 16 Q. And as you used the definition today,
 17 you're referring to the AR-15 and AK-47 platform as
 18 modern sporting rifles?
 19 A. Correct.
 20 Q. Okay. And none of the firearms you're
 21 referring to as a modern sporting rifles are
 22 machine guns as defined by federal law?
 23 A. So, you know, without looking up the
 24 federal law, in my opinion a machine gun -- the

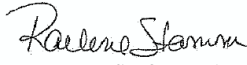
Page 193

1 difference between a machine gun and a
 2 semi-automatic, machine gun you can depress the
 3 trigger and rounds will fire until the magazine is
 4 empty or until you've release your pressure from
 5 that.
 6 So there are no machine guns counted in
 7 the modern sporting rifle chart that we were
 8 talking about today.
 9 MR. MAAG: I have no further questions. Thank
 10 you very much.
 11 MR. LOTHSON: That's it. We will reserve
 12 signature and take a copy. He'll read it.
 13 (WHEREUPON, the deposition
 14 concluded at 3:18 p.m.)
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24

Page 194

1 I, RAELENE STAMM, Certified Shorthand
 2 Reporter, licensed by the State of Illinois, do
 3 hereby certify that heretofore, to-wit, on the
 4 13th day of June, 2024, personally appeared before
 5 me JIM CURCURUTO, a witness in a certain cause now
 6 pending and undetermined in the United States
 7 District Court, Southern District of Illinois,
 8 wherein CALEB BARNETT, et al., are the Plaintiffs
 9 and KWAME RAOUL, et al., are the Defendants.
 10 I further certify that the said
 11 JIM CURCURUTO was by me first duly sworn to testify
 12 the truth, the whole truth, and nothing but the
 13 truth in the cause aforesaid; that the testimony
 14 then given by said witness was reported
 15 stenographically by me in the presence of said
 16 witness and afterwards reduced to typewriting by
 17 Computer-Aided Transcription, and the foregoing is
 18 a true and correct transcript of the testimony so
 19 given by said witness as aforesaid.
 20 I further certify that the signature to
 21 the foregoing deposition was not waived by counsel
 22 for the respective parties.
 23 I further certify that the taking of this
 24 deposition was pursuant to Notice and that there

Page 195

1 were present at the deposition the attorneys
 2 hereinbefore mentioned.
 3 I further certify that I am not counsel
 4 for nor in any way related to the parties to this
 5 suit, nor am I in any way interested in the outcome
 6 thereof.
 7 IN TESTIMONY WHEREOF: I have hereunto set
 8 my hand this 5th day of June, 2024.
 9
 10
 11
 12 
 13 CERTIFIED SHORTHAND REPORTER
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24

Page 196

1 Veritext Legal Solutions
 2 1100 Superior Ave
 3 Suite 1820
 4 Cleveland, Ohio 44114
 5 Phone: 216-523-1313
 6
 7 July 5, 2024
 8 To: ANDREW A. LOTHSON
 9
 10 Case Name: Barnett, Caleb, Et Al. v. Raoul, Kwame, Et Al.
 11 Veritext Reference Number: 6751326
 12
 13 Witness: Jim Curcuruto Deposition Date: 6/13/2024
 14
 15 Dear Sir/Madam:
 16
 17 Enclosed please find a deposition transcript. Please have the witness
 18 review the transcript and note any changes or corrections on the
 19 included errata sheet, indicating the page, line number, change, and
 20 the reason for the change. Have the witness' signature notarized and
 21 forward the completed page(s) back to us at the Production address
 22 shown
 23 above, or email to production-midwest@veritext.com.
 24
 25 If the errata is not returned within thirty days of your receipt of
 this letter, the reading and signing will be deemed waived.
 21 Sincerely,
 22 Production Department
 23
 24 NO NOTARY REQUIRED IN CA

Page 197

1 DEPOSITION REVIEW
 2 CERTIFICATION OF WITNESS
 3
 4 ASSIGNMENT REFERENCE NO: 6751326
 5 CASE NAME: Barnett, Caleb, Et Al. v. Raoul, Kwame, Et Al.
 6 DATE OF DEPOSITION: 6/13/2024
 7 WITNESS' NAME: Jim Curcuruto
 8 In accordance with the Rules of Civil
 Procedure, I have read the entire transcript of
 9 my testimony or it has been read to me.
 10 I have made no changes to the testimony
 11 as transcribed by the court reporter.
 12
 13 _____
 14 Date Jim Curcuruto
 15 Sworn to and subscribed before me, a
 16 Notary Public in and for the State and County,
 17 the referenced witness did personally appear
 18 and acknowledge that:
 19
 20 They have read the transcript;
 21 They signed the foregoing Sworn
 22 Statement; and
 23 Their execution of this Statement is of
 24 their free act and deed.
 25
 I have affixed my name and official seal
 this ____ day of _____, 20____.

 Notary Public

 Commission Expiration Date

1 DEPOSITION REVIEW
CERTIFICATION OF WITNESS

2 ASSIGNMENT REFERENCE NO: 6751326
3 CASE NAME: Barnett, Caleb, Et Al. v. Raoul, Kwame, Et Al.
DATE OF DEPOSITION: 6/13/2024
4 WITNESS' NAME: Jim Curcuruto

5 In accordance with the Rules of Civil
Procedure, I have read the entire transcript of
6 my testimony or it has been read to me.

7 I have listed my changes on the attached
Errata Sheet, listing page and line numbers as
8 well as the reason(s) for the change(s).

9 I request that these changes be entered
as part of the record of my testimony.

10
11 I have executed the Errata Sheet, as well
as this Certificate, and request and authorize
12 that both be appended to the transcript of my
testimony and be incorporated therein.

13 _____
Date Jim Curcuruto

14
15 Sworn to and subscribed before me, a
Notary Public in and for the State and County,
the referenced witness did personally appear
16 and acknowledge that:

17 They have read the transcript;
They have listed all of their corrections
18 in the appended Errata Sheet;
They signed the foregoing Sworn
19 Statement; and

20 Their execution of this Statement is of
their free act and deed.

21 I have affixed my name and official seal
22 this _____ day of _____, 20____.

23 _____
Notary Public

24 _____
25 Commission Expiration Date

1 ERRATA SHEET
VERITEXT LEGAL SOLUTIONS MIDWEST

2 ASSIGNMENT NO: 6751326
3 PAGE/LINE(S) / CHANGE /REASON

4	_____
5	_____
6	_____
7	_____
8	_____
9	_____
10	_____
11	_____
12	_____
13	_____
14	_____
15	_____
16	_____
17	_____
18	_____
19	_____

20 Date Jim Curcuruto

21 SUBSCRIBED AND SWORN TO BEFORE ME THIS _____

22 DAY OF _____, 20____.

23 _____
Notary Public

24 _____

25 Commission Expiration Date

&	185:13 186:10	150 11:9	1995 98:7
& 2:3	108,000 69:6,8	154 5:10	116:22
0	69:10,11 77:1	155,000 78:21	1997 115:14
0.29 133:19	77:2,11 78:17	15s 187:12	1:00 94:12
142:10 146:4	79:24 80:8	161 5:11	2
147:3,18	181:15,19	166 5:12	2 5:5 61:20,22
0.5 142:24	184:22	17 38:12	67:19 156:12
0.68 133:19	109 158:9	17,000 32:14	2,000 146:7
142:11 147:19	10:00 1:18	17.1000 32:13	178:24 190:11
04 98:12,12	10:55 38:10	18 16:4 40:17	190:12
084-004445	11 14:21 20:21	112:19 117:7	2,185 159:13
1:24	59:6,8	171:20 174:22	2,421 159:11
1	1100 196:1	180 4:5 154:15	20 38:24 57:8
1 5:4 38:15	115 2:18 5:8	154:20	112:19 117:8
62:3 102:6	117 5:9	181 161:24	167:3 174:23
103:22 112:17	12:05 94:2,10	163:19 164:4	197:16 198:22
164:4	13 121:3	170:14,16,20	199:22
10 59:5,8 126:4	153:13 156:5	171:1,10,15	20,000 147:14
132:10,19	158:1	182 4:6	2004 98:7
156:5 158:1,8	13,000 87:8	1820 196:2	2009 23:8
175:1	13,340 85:23	19 40:17 55:23	37:16
10,000 51:24,24	87:2	117:8	2010 111:22
85:11,13 86:22	13,380 86:19	19,700,000 57:5	119:17 120:9
87:3,8 100:23	13,400 86:10	19,797,000 55:8	120:11 121:1,9
146:18 147:1	13th 1:17 194:4	19.7 57:16	129:10,16
10/22 61:2	1414,000 75:21	58:12	137:17 148:12
10/22s 60:24	144 186:9	190 4:7	151:7 152:2,7
100 154:15	144,000 71:8	197 161:24	153:13 157:14
189:8,9,15,18	79:19 80:11	1990 41:3 42:3	177:8
101 156:12	181:18,22,23	55:12 59:1	2011 129:16
108 69:5 72:18	15 126:4	113:8 115:11	137:17
72:22 78:22	129:23 131:11	117:1	2012 20:16
181:20,24	132:9 175:1	1993 19:10	24:14
183:13 185:10	190:24 192:17	1994 115:13	2013 8:20 10:8

119:22 120:9 120:23 123:10 129:6,11 130:3 131:3 137:23 148:14,18 152:2,7 153:16 155:2,19 157:14 158:6 158:17 159:17 160:5,10,13,20 161:1,11 165:3 165:5,9,11 174:22 177:8 2015 20:16 2016 69:12 91:3 184:5 185:8 186:2 2017 16:4 2018 41:3,7 42:4 55:12 59:2 113:9 2020 42:17,21 43:4 63:19,24 64:1,1,3,3 102:24 103:3 156:20 157:4 170:1,24 2021 14:3 15:11 26:22 27:5 43:1,3 64:4 99:23 100:16 101:18 101:20 103:5 115:11 117:1 166:8 171:1	2022 154:21,23 155:5,20 156:16 167:3 167:18 2023 62:24 63:3,19 64:1,8 65:16 67:18 121:11 131:3 2024 1:17 194:4 195:8 196:4 209 1:6 21 63:12 101:21 102:3 117:8 163:17 21,000 120:18 141:13 147:5,8 21,167 96:17 21,942 134:9 137:9 146:7 2131 195:12 216-523-1313 196:3 21st 103:15 22 157:9 158:2 163:17 23 40:22 43:9 69:4,11,23,24 70:5,23 78:1 80:10 112:19 112:19,20,23 180:19 181:17 183:3 184:23 2300 190:8,9	2351 66:10 180:19 23b 77:11 24 80:15 82:3,5 25 52:9,21 26,719 134:9 29 59:8 2:15 144:21 <hr/> 3 <hr/> 3 5:6 66:3,5 98:4 180:20 3-21 102:2 30 49:2 51:4 52:2,10,21 54:5,7,17,21 59:8 72:12,14 166:7 179:23 300 105:6 300,000,000 113:7,13 146:20 304 58:24 60:19 117:14 304,000,000 113:12 312 2:9,20 313 103:1,23 104:20 106:24 109:7 110:6 320,000,000 146:16 321-9100 2:9 330 1:16 2:6 3300 1:16 2:7	34 38:13 42:14 173:15 340 86:10 35 148:9,10 150:13 151:10 151:22 38 5:4 3967 166:17 3968 168:5 170:12,17,23 3985 166:17 171:21 178:2 3:18 193:14 3:23 1:6 <hr/> 4 <hr/> 4 5:7 51:4 99:17,19 132:23 170:21 40,000 82:6,14 82:17 83:1 85:7 41 64:9 44 148:12 150:12 151:7 151:21 44114 196:2 45 181:12 47 191:1 192:17 <hr/> 5 <hr/> 5 5:8 22:5,13 22:21 51:4 105:1,5,7 115:5,7 129:22
---	---	--	--

140:20 142:23 144:6 148:6 167:24 169:10 170:21 196:4 5,000 105:2,4 105:18 140:21 50 37:5,11 97:5 101:14 110:4 50,000 105:18 50,000,000 146:10 500 134:22 500,000 146:9 54,000 71:8 74:4 75:21 76:19 80:2 55 102:8 56 102:7,14 103:21 57 102:8 5902 118:7 5907 132:23 142:7 144:24 5908 129:23 148:6 5987 118:7 5th 195:8	198:3 60 104:7 60603 2:19 60611 2:8 61 5:5 111:11 66 5:6 6751326 196:7 197:2 198:2 199:2 68 85:19 69 85:10,20,22	8 8 5:11 161:17 161:19 173:24 175:1 814-8570 2:20	181:17 183:3 184:23 ability 7:24 able 60:11,23 84:4 149:4,14 158:3 167:14 180:7 above 196:17 absence 83:14 84:3 ac 69:23 accept 60:23 access 62:14 81:4 accessories 135:21 accomplish 22:8 accordance 197:5 198:5 accuracy 30:6 30:24 116:14 153:5 accurate 17:6 68:19 76:3 90:12 97:1,2 99:6 116:19,20 121:23 185:23 189:11 191:20
	7	9 9 5:12 166:12 166:14 90 80:4 181:12 90,000 71:7 74:4 75:20 76:6,22 78:15 78:19,21 80:2 90,116 80:5 90k 71:9 75:24 183:4 94 98:11,18 95 18:9 22:4,9 22:12,21 98:12 104:24 105:5,7 142:12,23,24 144:6,24 146:4 963 117:14 963,772,000 117:2 968 171:13 99 5:7 76:16	
6	7 5:10 40:21 64:8,12 112:23 154:9,11 173:24 7,000 120:17 147:13 7.6 163:12,12 70 73:13,20 86:16 104:7 75 71:2,21 72:8 73:7,13 79:2 79:11 80:11 97:5,12 181:1 181:6,14,18,23 181:24 182:8 182:21,24 183:8,11,24 184:4,10,12 185:1 186:9,10 186:15 797 55:23	a a.m. 1:18 ab 69:4,24 70:5 70:23 77:11 80:10,15 82:3 82:5 85:10,19 85:22 180:19	
6 4:4 5:9 111:10 117:21 117:23 166:7 170:20 173:24 179:23 6/13/2024 196:8 197:3			act 14:13 197:14 198:20

<p>acting 20:23 action 85:23 86:9,14 90:19 92:13,13 actual 26:6 151:22 actually 64:23 67:1 83:15 101:24 108:21 113:15 129:11 132:2 146:22 149:19,22 170:7 190:19 adam 3:9 167:2 167:5,10,11,21 172:7 173:16 173:16 add 48:22 96:7 113:24 added 16:8,8 70:10 75:20 81:9 161:14 172:16 173:9 175:18 addition 124:2 126:13 additional 117:4 169:22 address 172:23 196:15 addressed 168:9 adjust 68:14 administer 109:21</p>	<p>administration 19:13 admitted 9:9 ads 133:14 138:24 149:5 advent 132:18 advertise 151:18 af 66:13 affect 147:10 169:13 affixed 197:15 198:21 afmer 34:3 44:8,16 48:3,5 49:5,14,17,23 54:8,23 56:16 56:23 59:24 64:18 67:3,21 67:22 68:12,23 69:14 72:19 74:8 75:6 76:17 79:21 80:4 82:12 86:11 95:10 113:20 190:7 aforesaid 194:13,19 aftermarket 114:1 agencies 15:23 17:22 28:21 57:3,10 60:13 aggregate 101:8 106:23</p>	<p>aggregated 50:9 55:6 ago 8:10,13 48:24 65:24 66:22 72:1 80:24 82:2 97:19 120:4 128:15 134:18 140:2 143:2 148:20 159:6 165:6 177:1 179:23 188:20 189:1 agree 105:14 107:15,24 117:10 131:8 131:16,18 135:23 145:2 146:6 178:14 agreements 13:1 ah 173:15,15 ahead 108:7 112:21 121:19 121:20 176:10 188:9 191:22 ai 66:11 aided 194:17 aim 159:19 160:22 ak 24:20 35:4,7 35:19 37:3 71:3,4 92:10 92:19,23 93:7 95:15 111:1,20</p>	<p>111:24 129:18 130:4,7,14,19 131:5 132:9,20 181:2,2 184:1 191:1 192:10 192:17 aks 38:3 al 1:4,7 194:8,9 196:6,6 197:3 197:3 198:3,3 alarmed 169:9 alarming 169:8 alcohol 44:17 44:17 aligns 28:23 allowed 134:23 alothson 2:10 alternatively 153:18 ammo 101:1 ammunition 12:17 13:7,8 13:10 15:3,6 23:14 37:5,11 amount 67:2 84:19 111:20 119:6 125:12 125:13 143:11 analysis 15:15 17:6 21:15 23:6 24:18 47:20 51:20 53:1,4 54:13 58:7,15 102:20 104:22 109:4</p>
---	---	---	--

<p>157:19 159:12 analyst 167:15 analyze 54:23 analyzed 134:12 andrew 2:4 9:17 10:2 196:5 anecdotally 165:21 anglers 11:19 11:22 annual 30:20 30:20 33:15 41:23 42:4 44:18 47:18 72:4,17 91:14 answer 7:7,12 7:14 12:23 22:12 29:6 32:24 47:2,4 52:19 62:11 73:1,2,23 82:6 89:8 98:1 124:7 126:17 147:23 149:20 150:21 162:15 162:17,17 169:16 176:10 179:24 183:18 188:10,12 answered 54:2 62:16 82:15 84:16 87:5 176:8 184:15</p>	<p>188:8 189:23 answering 52:20 150:18 answers 22:11 88:14 146:24 147:1 179:18 188:9 anticipate 120:23 anybody 11:1 26:14 28:22 41:17 101:10 114:10,14 125:24 136:4 168:24 anyway 78:8 anyways 24:16 apart 20:5 apologies 66:13 69:20 apologize 54:2 69:21 188:14 app 187:17 apparel 59:17 apparently 9:8 71:14 72:12 86:7 175:2 appear 45:8 197:11 198:15 appearances 2:1 appeared 194:4 appears 78:15 103:18 167:1 170:19 174:9</p>	<p>184:12 appended 198:11,18 apple 144:6 application 142:20 applied 60:4 apply 49:11 57:23 86:15,18 91:19 157:13 181:23 applying 23:1 appreciate 135:3 appropriate 94:3 approximate 97:4 approximately 15:9 16:4 20:16 24:11,13 51:4 52:9,10 54:4 57:8 79:4 97:12 100:22 118:5 approximation 97:17 114:18 ar 24:20 30:2 35:4,7,18 37:2 38:3 44:4 50:13 83:10 90:20,21 92:10 92:15,18,23 93:7 95:15 96:16 111:1,14</p>	<p>111:18,19,20 111:24 112:7 129:18 130:3,7 130:14,19 131:5,11 132:9 132:9,10,19,20 179:1 187:12 190:24 192:9 192:17 ar15 140:1 141:8 ar15.com 139:8 139:9,11,16,22 140:5 141:4 ar15s 52:6 areas 32:8 argumentative 108:5 arm 12:7 arms 49:19 51:21 arrive 188:2 arrived 96:2 97:17 ars 96:16 articulate 149:18 aside 107:7 161:15 asked 23:4 30:8 46:18 47:2,8 57:19 58:10 59:13 60:15 87:4 95:5 113:3 128:18</p>
---	---	---	---

<p>133:9 134:5 176:8 178:8 184:15 188:8 189:22 asking 8:13 40:19 52:21 150:19 188:21 asks 172:20 aspect 24:17 29:16 101:17 158:24 aspects 21:9 assault 14:13 98:19,20 assembling 41:14 assess 127:16 145:2 assignment 197:2 198:2 199:2 associate 40:2 81:5 associate's 19:14 associated 22:16 145:3 175:24 associates 109:21 119:4 association 20:8 23:13 47:7 100:20 assume 7:7 27:14 71:15</p>	<p>110:21 129:2 142:5 150:2 166:23 173:16 assuming 82:11 86:10,13 139:16 143:12 156:14 assumption 47:15,21 56:5 58:1 76:6 172:6 atf 33:14 34:2 44:8,16 64:18 75:12,18 attached 198:7 attachment 167:23 168:4,8 168:11 attention 24:16 40:24 128:4 130:1 133:22 164:18 168:3 171:20 172:9 175:2 attitudes 159:1 attorney 2:15 6:9,10 9:7 attorneys 9:21 10:24 94:17 195:1 attributable 151:22 audience 22:20 authorize 198:11</p>	<p>automatic 33:18 35:1,6 35:11,13,15 74:18 110:24 111:1 130:4,16 130:20 131:1,1 131:5,22 191:18 192:4,9 192:14 193:2 available 8:13 13:19 30:11 36:24 47:14 83:12 113:20 113:24 114:22 138:22 141:7 172:22 173:3 avant 141:1 ave 196:1 avenue 2:6 average 126:3 149:6 avoid 7:2 175:11 avoiding 176:7 aware 24:3 34:18 89:12 92:7 104:19 107:8,12 110:10 152:10 170:21 174:21 186:13,17 awoke 172:20</p>	<p>b b 2:5 5:1 166:7 179:23 bachelor 19:10 bachelor's 19:12,15 back 14:22 33:12 38:9 43:8 48:4 60:17 67:10 70:4,15 73:15 77:20 78:22 79:9 80:3 82:1 82:11 86:3 87:12 94:11 96:23 98:3 100:17 101:11 101:19 102:1 103:13 104:24 106:9 108:21 108:23 109:9 110:13,21 111:22 118:4 120:4,9,14 121:3 125:13 131:11 132:4 134:17 137:22 140:11,17 144:20 148:20 152:14 156:18 157:10 161:3 161:10 165:5 169:24 172:11 172:14 174:22 176:18 180:18</p>
---	--	--	---

<p>183:2 184:18 186:6 188:8,11 196:15 background 148:11,24 149:1 151:9,17 152:9 178:20 backwards 91:8 bad 47:6 122:3 baird 3:3 ballpark 24:13 52:24 58:13 104:7 ban 98:19,21 banahan 3:10 banner 133:14 138:24 164:9 bar 59:2 barnett 1:4 6:10 194:8 196:6 197:3 198:3 barrel 75:15 barriers 123:24 bartozzi 27:16 based 25:12 28:11 29:14 30:4 32:24 33:1 52:12 73:10 76:13 79:18 82:22 86:24 88:24 100:21 113:6 118:17 120:1</p>	<p>120:10 128:10 158:14 186:19 baseline 35:5 basement 104:13 basic 21:1 basically 75:12 108:9 122:1 basis 17:9,16 41:23 42:4 47:18 50:10 60:15 72:4,17 91:14 151:20 bates 38:12 64:9 66:10 118:6 154:14 161:23 166:16 beam 191:10 bear 149:17 becoming 137:21 beginning 71:20 163:20 166:5 176:17 begins 148:9 behalf 2:12,23 13:19 behaviors 159:1 belief 147:24 believe 6:15 8:16,20,20 9:4 9:17 10:19 14:3,10 15:16 18:5,17 19:2</p>	<p>19:14,22 20:6 20:11 24:14 26:22 27:4,16 28:2,15 30:1 30:15,18,20 33:13,16,20 34:13 37:20 40:7 45:9 46:21 52:21 56:16 57:21 61:9 63:10 65:9 66:18 69:5 74:9,12 75:8,10 80:10 81:4 85:19 86:22 89:17 100:9 101:10 107:13 114:16 116:3 117:7,21 118:3 119:16 119:18 120:5,6 120:13 121:4,7 122:9 124:23 129:6,10 130:17 132:17 136:22 138:12 140:1,3 145:17 147:20 152:1 155:7,12,23 156:4,11 160:6 165:5 166:21 169:11 171:5 178:3,7 181:14 181:17 184:5</p>	<p>believed 136:11 bell 2:3 173:13 belonged 57:9 benefits 23:15 best 7:1 30:10 59:22 68:7 70:16 73:16 75:4 76:3,6 77:12 79:18 81:24 91:5 95:9 97:3,8 105:21 108:19 111:8 112:8 119:15 121:4 123:20 124:1 127:8,13 128:14 133:11 139:24 147:12 148:21 150:22 153:21 154:4 165:4 167:20 177:21 181:11 182:11 185:8 192:7 better 23:18 25:15,15 31:24 32:6,9 123:7 148:22 149:14 179:5 beyond 117:5 166:9 bias 169:23 big 28:3 74:16 101:5 140:16 160:10 177:10</p>
--	--	--	---

<p>bill 12:11 bit 6:16 72:10 72:15 104:23 109:8 130:17 130:21 132:4 149:13 157:22 159:4 bits 156:2 black 93:7 blacks 81:11 blank 68:2 blanks 66:20 68:1 block 98:6,17 blocked 98:24 blogs 138:24 blowers 75:11 76:20 bmg 37:5,11 board 144:3,5 boat 179:10,12 boats 8:15 bolt 50:5 85:23 86:9,14 90:19 92:13 bottom 42:17 44:7 55:8 58:18 64:17 102:1 118:12 159:10 bought 56:8 169:18 box 125:23 141:2 180:22 183:1 184:14</p>	<p>185:1 186:20 boxes 70:10 81:22 brain 45:3 break 7:17,19 38:5,6 60:15 93:24 94:7,17 144:15 breakdowns 60:2 brendan 6:11 brick 104:15 briefly 10:13 14:22 39:7 42:13 100:13 100:18 bring 120:14 122:19 156:16 156:18 164:10 bringing 67:10 77:20 135:3 broad 137:16 broader 135:9 broadly 109:17 broken 34:4 59:8 brought 24:16 120:9 128:3 buck 122:1 budgetary 27:6 bug 98:2 build 23:23 139:18 building 17:20</p>	<p>bulk 75:10 119:4 132:21 135:19 bureau 44:17 burke 20:8,12 business 13:4 14:18 15:20 18:3 19:10,13 20:3 23:18 31:6 110:8 124:8 138:4,16 147:16 152:4 buy 136:2,9 buyer 114:6 buyers 25:18 buying 156:22 156:24 buys 138:15</p> <hr/> <p style="text-align: center;">c</p> <hr/> <p>c 8:6,6 71:8 74:13,14 126:17,17,17 126:17,17 ca 196:24 calculate 22:16 calculated 60:6 143:7 146:5 calculations 124:21 calculator 80:12 181:21 caleb 1:4 194:8 196:6 197:3 198:3</p>	<p>caliber 37:5,11 call 8:9,12 9:3 10:20 11:21 19:3,5 23:24 34:2 39:9 50:3 50:8 51:5 53:16 73:24 76:10 77:5 82:6,15 86:19 87:7,8 89:7 90:22 92:2 93:23 104:13 122:20 124:3 125:15 126:9 154:23 162:20 187:15 called 1:10 6:4 12:2 14:12 16:9,10 18:23 24:21 53:22 93:21 118:8 126:15 140:16 154:15 181:22 186:4 calling 37:24 101:20 123:15 calls 10:1 76:16 76:17 78:12 79:7 91:22 114:8 118:23 124:9,13 campaign 179:9,14 campaigns 179:1,5</p>
--	---	---	--

<p>cans 59:19 61:4 capable 35:1 110:24 192:10 capacity 14:14 18:16 24:22 30:3 166:8,10 167:10 179:24 carbine 191:7 191:10 card 134:22 career 19:23 34:21 36:24 carolina 19:16 case 6:10 10:7 14:4,9,12 24:15 49:21 60:19 74:1 75:8 78:6 84:16 86:7,23 93:8 99:12 121:17 123:3 145:17 153:15 158:2 165:23 196:6 197:3 198:3 cases 14:1,6 21:7 24:8 29:23 30:5,7 30:23 31:14,15 31:19 90:2,11 95:22 96:13,14 96:15 97:11,15 174:6 185:21 187:4</p>	<p>catch 17:15 18:9 categories 48:10,12 60:3 74:7,10 76:22 79:21 111:13 178:18 category 33:22 34:14,16,17 36:10,17 52:7 68:16,23 69:15 69:15 75:1,6 76:5 82:12 86:11 90:17 92:21 112:10 131:24 132:8 137:2 140:24 179:20 187:7 189:10 192:13 cause 194:5,13 caution 78:20 82:16 83:7 85:6 185:18,21 187:21 caveat 42:11 61:16 80:1 cell 69:3,23 70:5,23 73:7 78:6 80:8,15 80:20 82:3 83:18 84:2 85:10 183:3 cells 80:22 96:9 98:6,10</p>	<p>census 143:22 certain 98:17 125:12,13 148:3 151:24 162:15 194:5 certainly 25:3 25:23 30:8 31:22 122:24 125:10 127:24 131:12 135:11 136:3 155:10 168:22 certificate 198:11 certification 197:1 198:1 certified 1:14 194:1 195:13 certify 194:3,10 194:20,23 195:3 cfo 27:19 challenges 29:24 chambered 37:5,11 chance 39:5 40:12,15 41:16 42:22 82:18 94:14 107:4 126:11 134:21 134:24 162:7 change 16:6 30:23 34:9 146:20 148:3</p>	<p>149:22 150:15 150:16,17 151:21,22,23 157:23,24 159:6 170:4 196:13,14 198:8 199:3 changed 33:7 65:3 157:16,21 changes 158:21 163:9 174:11 196:12 197:7 198:7,9 chart 10:16 30:18 41:6,24 42:3,8 43:9 45:4 47:23 49:15 51:2,17 52:11 54:6 58:18,19,23 59:12 60:10 61:13 64:11 65:12,18 68:20 93:4 98:23 112:24 113:11 113:17,19 114:17 117:5 156:1 183:13 183:16 187:14 189:13 193:7 charts 43:13 45:7,15 46:7 46:15,16 55:7 59:2,4,7,24</p>
--	---	--	--

<p>check 25:21 48:18 52:4 54:11 101:22 123:17 182:18 checked 44:3 91:22 124:18 124:24 125:23 checking 124:16 checks 110:1 chicago 1:16 2:8,19 chose 136:1,9 chris 27:18 christopher 2:16 christopher.... 2:21 chunk 27:1 101:5 circle 14:22 civil 1:11 197:5 198:5 civilian 56:6,12 56:19 58:4 148:15,19 civilians 56:14 60:13 claim 186:14 clarification 8:11 105:12 188:18 clarify 7:6 15:5 92:9,15 130:18 131:3 136:15</p>	<p>184:19 186:3 190:20 clarity 14:11 classes 19:20 20:11 clause 185:2 clay 39:18 clays 39:18 125:22,24 127:5 clear 56:22 129:7 142:3 149:17 184:17 cleveland 196:2 click 164:9,13 client 13:9,10 13:15 122:21 163:8 clients 12:13,22 13:2,6 close 78:23 closely 20:20 89:19 cobleskill 19:15 coded 81:9 102:2 codes 49:10 coding 81:7 cold 124:9,13 collaborated 88:4 colleagues 70:12 collect 89:14</p>	<p>collected 102:23 collecting 177:11 collection 88:9 college 19:18 19:23 colloquially 125:6 colon 85:23 color 81:6,9,10 81:22 column 49:7,12 49:18 68:2,7 69:4 78:5 columns 66:11 70:18 74:10,21 come 32:19 34:13 132:6 137:9 141:3 181:6 184:24 comes 30:19 147:3 171:14 171:15 175:13 comfortable 31:2 60:6 86:18 119:9 128:16 141:12 141:15 174:1 coming 119:18 comment 70:12 70:17,21,23 71:20 73:3 74:3 75:20,23 76:2,9 78:13</p>	<p>79:14 82:3,9 85:15,22 86:2 173:7,11,17 180:22,24 183:1,2,7,8,19 183:21,22,24 184:5,12,14 185:1,3,6,22 186:5 comments 70:8 72:3 80:23 81:9 87:15 173:14 186:21 commerce 108:14 commission 44:22 197:19 198:25 199:25 common 38:1 93:12 111:3 commonality 24:20 commonly 173:3 177:19 179:21 communicate 40:6 communicati... 68:13 communities 14:13 companies 49:2 49:24 51:8,11 52:2 54:5,7,17 72:11 74:16,21</p>
--	--	---	--

84:12 119:6 122:7 company 48:21 49:20 50:3 52:2,3 54:24 56:17 71:12,15 72:18,20,24 73:1 74:16,24 75:24 76:7,13 78:1,6,14,16 79:22 82:10,12 84:5,11 85:5,5 86:5,19 183:4 185:23 compared 158:16 170:8 170:24 comparing 143:16 171:6 comparison 155:2 160:21 178:17 compensated 11:4 competitive 177:12 compile 47:9 complete 53:6 83:5 101:11 128:10 134:4 140:21 170:1 completed 22:3 156:8 159:11 174:10 196:15	completely 116:12 completeness 146:15 completes 140:18 complex 81:16 81:17 89:18 186:24 composition 149:22 compound 52:14 146:11 150:20 190:1 comprehensive 77:17 83:11,12 118:9 153:10 154:16 computer 194:17 concept 142:20 concerned 110:2 concerning 14:12 172:15 176:19,22 177:4 concerns 17:2,5 19:6 152:23 153:4,24 166:4 169:2 concluded 193:14 conclusion 113:6	conditions 7:22 25:15 151:23 conduct 25:6 31:11 120:9 157:12 conducted 15:1 23:11 30:6 31:1,3 90:3 102:24 109:11 114:21 119:16 120:8 125:3 139:21 141:20 156:5,10,14 158:16 conducting 16:21 21:17 23:20 91:15 106:11 125:15 conference 3:5 conferences 144:5 confidence 22:5,9,16,21 31:20 105:9,11 105:16,24 106:5 133:18 133:19 142:8,9 142:12,15,22 143:6,15,20,24 144:2,7,24 145:3,10,16,19 146:8 147:11 150:22 152:2 confident 30:10 31:22 45:10	46:23 55:4 72:21 73:2 97:24 105:1 114:20,23 147:14 confidential 13:3 50:10 confidentiality 12:24 confirm 55:2 82:14 124:20 confused 37:7 83:21 confusing 52:15 76:12 146:12 150:20 190:1 conglomerates 140:16 conservation 11:12,24 12:19 12:20 13:13 14:17 28:19 conservations 155:15 consider 48:3 76:22 96:6 97:13 171:22 172:4 190:10 considered 33:21 48:16 51:17 69:13 79:12 95:12 190:5
--	--	--	---

<p>constitutional 159:23 160:24 164:22 168:15 169:4 171:9 constraints 175:6 consult 12:18 17:17 consultation 46:10 consulting 12:1 12:14,22 14:18 14:23 consumer 15:7 15:8,19 16:22 30:17,20 34:12 57:18 59:1 118:9 120:8 123:23 135:13 137:19 149:6 151:16 153:19 154:16,23 155:5,19 159:21 160:3,9 161:2 163:4 165:3,20 167:18 171:11 consumers 113:8,15 114:19 151:12 152:7 177:5 178:5 179:18 consuming 81:18</p>	<p>contact 48:20 50:16 51:7 53:12 71:4 72:24 167:9 181:3 182:19 182:21 184:1 185:3,9,12 190:6 contacted 18:24 157:11 181:13 185:9 contacting 51:1 107:16 185:12 contacts 50:3 107:11 119:23 contest 134:8 contested 30:7 context 14:11 73:13 121:15 continue 122:23 continuing 20:6 contract 21:4 119:5 contracted 21:3,8 118:18 120:5,22 121:3 143:12 contracting 119:10 contrast 150:11 contributed 52:11 54:5 84:4</p>	<p>contributions 11:21 control 109:24 conversations 26:4,5 92:22 convinced 73:22 cook 8:20 10:7 24:15 cool 128:7 cooperation 190:13 coordination 81:22 copied 167:8 copies 38:11 copy 8:21 102:9 106:21 164:5 193:12 copyright 42:16,17,24 154:20 corner 102:1 correct 6:12 9:14 13:12,21 15:13 21:20 26:13 27:8 29:18,22 31:21 34:1,10,20 35:12 41:7,8 41:12 42:19 43:2,3,16,20 54:18,19 55:4 57:4 62:21,22 64:16 65:14</p>	<p>67:22 68:11 69:1,12 70:6 71:1,11 74:6,9 75:2,22 77:10 78:4,11 79:8 79:23 80:10 83:3 85:14 86:1 88:2,3 90:5,16 91:5 94:21 98:8 100:1 103:24 107:23 111:15 111:19 113:5 113:11 115:11 115:12 116:10 117:2,3,8,14 118:10,11 122:1 130:8 134:11,15 137:4 142:14 142:17,21 148:17 154:17 154:18,22 159:15,17,18 160:1 167:3,4 168:7,10,15,18 170:14 171:3 171:13,24 172:12 173:1 176:21 181:5 183:5 185:4 187:8 189:12 192:19 194:18 corrections 196:12 198:17</p>
--	---	--	---

<p>correctly 52:20 117:21 122:8 124:22 130:6 134:4,10 142:13 148:16 172:24 173:5 174:8</p> <p>correspond 45:7 55:13 68:9,15</p> <p>corresponded 74:8</p> <p>corresponding 67:18 70:23 78:1,4 82:3 83:18 85:16 98:7</p> <p>corresponds 70:8 75:6 98:18</p> <p>corroborates 182:1</p> <p>cost 140:21</p> <p>costs 11:7 39:17 135:21</p> <p>counsel 10:22 194:21 195:3</p> <p>count 36:10,14 36:16 50:15 69:20</p> <p>counted 79:4 135:24 136:12 137:3 188:4 193:6</p>	<p>country 56:9</p> <p>county 8:20 10:7 24:15 197:10 198:15</p> <p>couple 65:4 145:11 172:15 173:13 179:23 180:15 190:19</p> <p>course 38:6 62:7 72:14 145:23 152:6 157:7 173:18 180:11 187:24</p> <p>courses 20:15</p> <p>coursework 20:1,18</p> <p>court 1:1 6:22 6:24 31:14 174:6 194:7 197:7</p> <p>courts 1:12 31:10</p> <p>cover 118:12</p> <p>covered 158:24 174:7 191:6</p> <p>covering 11:6</p> <p>covers 46:1</p> <p>covid 27:1 156:21 157:1 158:20</p> <p>crazy 156:21 157:5</p> <p>cream 104:10 108:10</p>	<p>create 40:8 43:12 47:23,24 59:12 63:16 164:8</p> <p>created 45:2 48:24 56:4 58:21 61:18 63:21 66:21,24 67:12,15 68:3 133:20 153:2 155:11</p> <p>creating 21:13 42:8 45:1 51:2 51:17 63:8 72:17 91:1 119:22 167:17</p> <p>creation 39:22 41:10</p> <p>credit 122:4</p> <p>criteria 189:12</p> <p>crop 104:10 108:10</p> <p>cross 55:1</p> <p>cryptic 71:13</p> <p>csr 1:23</p> <p>curcuruto 1:10 4:3 5:3 6:3,8 8:4 12:12 38:14,18 61:21 66:4,15 70:24 82:5 85:22 87:21 99:18 115:6 117:22 144:23 154:10 161:18 166:13</p>	<p>166:19 180:13 180:24 194:5 194:11 196:8 197:4,9 198:4 198:13 199:20</p> <p>curiosity 115:20</p> <p>current 23:17 55:18 159:21 160:9</p> <p>currently 11:10 65:20</p> <p>customer 122:12 124:1</p> <p>customer's 179:7</p> <p>customers 16:11 179:6</p> <p>cut 160:16 175:7,14,19</p> <p>cuts 27:3,4</p> <p>cv 1:6</p>
d			
<p>d 4:1</p> <p>darn 153:2</p> <p>data 23:5 33:24 39:11 41:7,14 41:20 43:11 46:17,24 48:3 48:4 49:5,8,14 49:17 51:16 52:11 54:5,8 54:23 55:6 56:1,13,16,23 57:14,17 59:16</p>			

59:16,23 60:4 61:7 63:6 64:15 67:3,17 68:13,19,23 69:14 74:8 76:18 78:7 80:4 83:16 84:2,5 88:17 89:14 90:11 91:3 93:16,17 96:9 103:4,11 108:24 111:13 113:20 114:17 114:19 117:4 121:6,8,16 123:13 135:6,7 139:20 146:21 151:3 152:4 153:13 158:2,4 165:7,9,23 169:23 178:10 180:4 187:17 database 106:18 107:14 108:19 138:22 date 63:19,19 101:24 103:15 127:11 196:8 197:3,9,19 198:3,13,25 199:20,25 dated 167:2 david 3:7 9:8 day 1:17 140:17 194:4	195:8 197:16 198:22 199:22 days 17:8 126:8 196:18 dear 196:10 deb 27:17 decade 175:3 decide 127:21 decided 78:7 179:16 deciding 26:15 decision 13:4 27:12,13 31:6 46:22 47:6 115:3 123:2,8 138:4 147:16 156:15 171:17 174:14 175:24 180:5 decisions 23:17 23:18 25:16 46:24 81:21 110:8 152:4 173:20 deed 197:14 198:20 deemed 196:19 deep 116:16 155:14 defendant 1:8 defendants 2:23 6:9 194:9 defense 136:12 136:15,22 172:11,14	173:4 176:19 176:22 177:3,6 177:13,19 178:6,17 179:2 179:21 define 17:10 92:21 93:1 defined 34:24 110:20 187:13 192:22 definition 33:11 35:5,21 37:9 75:10 95:15 111:23 129:7,9 130:9 130:10,11,22 131:8,14,16,18 131:21,24 132:11 136:7 190:5,11 192:5 192:8,15,16 definitions 37:23 degree 20:3 21:18 degrees 19:21 delayed 156:20 157:7 delete 127:6 delve 28:17 delved 58:5 delving 135:14 demands 34:13 department 16:16 28:18	29:8,9 196:22 departments 29:8 57:2 departure 10:11 155:8 depending 147:21 deposed 6:12 deposition 1:10 5:3 8:8,19,21 9:16 10:6,18 11:1 28:5,11 37:7 38:14 61:21 62:20 65:5 66:4 67:5 99:18 100:11 115:6,16 116:4 117:22 154:10 161:18 166:10 166:13 179:23 193:13 194:21 194:24 195:1 196:8,11 197:1 197:3 198:1,3 depositions 1:13 13:23 depress 193:2 depth 102:20 describe 13:15 20:10 23:10 47:22 100:18 122:15 described 43:19 60:17,20 139:6
---	--	--	---

<p>description 52:8 113:10 158:14</p> <p>designed 135:24</p> <p>detachable 35:2,6 58:24 60:23 111:1 115:10 130:5 130:16,21 131:6,23 192:10</p> <p>detail 9:6 10:14 18:20 58:5 100:14 112:13 116:19 129:19 130:17 150:9</p> <p>detailed 58:15 96:4 97:10 155:16</p> <p>details 188:21</p> <p>determination 49:19 69:9</p> <p>determine 58:7 109:4 135:19 164:16 189:7</p> <p>determined 53:9 143:16</p> <p>determining 79:3 177:18</p> <p>develop 37:21 67:1 179:1</p> <p>developed 20:18 37:22 65:22 84:19</p>	<p>developing 46:7 116:8 138:9</p> <p>development 16:5 20:14 103:19 155:9</p> <p>dianne 16:1,14 17:15 18:6 40:2 41:19 81:5,9 87:16 89:6,13,18</p> <p>differ 28:14,15</p> <p>difference 28:16 32:15 65:7 150:12 193:1</p> <p>differences 158:15 170:20</p> <p>different 8:17 29:7 31:14 33:3 37:24 39:15,20 48:10 49:10 57:14 60:3,20 64:15 67:24 68:10 80:22,22,23 81:10 83:15 85:7 89:3,13 89:20 91:3 92:2 101:12 121:2 130:10 130:21 132:4 143:19 145:11 146:7 149:5 154:1,2 159:9</p>	<p>160:12 176:10 177:10 188:7</p> <p>differentiated 33:24</p> <p>differently 45:16 176:4 185:20</p> <p>differs 159:4 170:7,12</p> <p>dig 177:15</p> <p>direct 15:21,24 40:24 58:17 63:2 69:3 98:3 130:1 133:22 144:4 164:12 164:18 168:3 171:20 172:9</p> <p>directed 15:19</p> <p>direction 26:20</p> <p>directly 16:15 77:8 79:21 88:1 96:12 101:21 116:9 184:24 186:16</p> <p>director 6:11 11:11,14 15:15 16:4 20:23 25:11</p> <p>disaggregate 56:13</p> <p>discard 114:14</p> <p>discarded 114:6</p> <p>disclaimer 131:14</p>	<p>discuss 9:3 11:1 18:18,24 88:17 139:22</p> <p>discussed 61:7 68:13 79:9 95:14 96:20 140:1 180:22 181:8 185:15</p> <p>discussing 95:1 96:10 170:7</p> <p>discussion 9:10 24:7 36:7 112:12 116:4</p> <p>discussions 77:12 157:18 157:19</p> <p>display 135:6</p> <p>disproportion... 107:17</p> <p>disproportion... 108:2</p> <p>distribute 154:8</p> <p>distribution 159:2</p> <p>district 1:1,2 1:12 194:7,7</p> <p>doc 30:19</p> <p>document 10:9 38:19,21 49:4 62:2,20 63:6 66:9,21,23 67:6,7,13 69:17 70:2,4 85:17 99:15,22</p>
--	---	---	--

<p>100:3,4 115:5 116:22 117:18 118:2 132:23 137:4 141:17 154:14,15,20 161:21 162:3,4 162:10 163:2,6 163:18 166:19 168:4,23 171:8 189:20 documentatio... 77:15 documented 76:15 183:1,3 documents 8:17,23,24 9:5 10:6,18 21:14 44:13 115:15 163:6 168:20 186:13 doing 17:16 18:19 50:9 60:18 81:23 111:21 122:18 124:13 138:2 153:1 156:6 dollar 101:14 101:14 143:23 dollars 17:21 dolnack 27:18 door 89:20 dozen 141:10 dozens 153:11 draft 176:13</p>	<p>drafted 133:5,5 drafts 168:20 draw 150:11 drill 40:20 160:15 due 31:16 111:20 156:21 158:20 160:13 175:6 dues 106:16 dug 116:16 duly 6:2,4 133:20 194:11 dynata 140:16</p>	<p>eat 94:14 economics 25:19 edition 63:3 99:23 100:16 101:18 119:22 educate 159:22 160:11,23 164:20 165:24 168:13 169:3 education 19:9 19:18 20:5,7 effectively 172:23 effort 101:4 122:3 159:23 160:24 164:21 168:14 169:4 171:9 efforts 107:9 eight 180:21 either 65:13 69:14 86:11,17 87:11 130:3 131:4 141:19 143:9 144:8 145:15,16 148:11 180:21 182:16 ellipses 160:23 else's 45:20 email 10:12 159:2 164:13 164:14 166:22 167:1,15 168:8</p>	<p>196:17 emails 8:18 10:10 164:13 166:22,24 employed 8:18 11:10 103:7 121:1 employee 167:6 employment 11:23 24:9 empty 193:4 enclosed 196:11 encompass 35:18 57:1 encompassed 38:2 131:22 encompassing 60:22 encourage 93:14 endeavors 16:21 ended 119:10 126:23 127:1,3 enforcement 56:15,19,20 57:3,9,21 58:1 58:2,3,8 60:13 61:1 148:11 149:1 151:8,12 151:17 152:9 engage 15:9 engaged 107:9</p>
	e		
	<p>e 4:1 5:1 34:3 108:14 110:11 139:1,9,12 167:2 earlier 29:19 43:19 48:9 63:7 67:13 68:12 72:10,12 95:1 103:10 113:2 117:13 142:22 171:7 181:8 182:2,10 188:21 early 15:11 27:5 easier 63:2 162:23 easily 162:19 easy 46:16 128:1,1</p>		

<p>enjoy 77:22 ensure 104:20 109:13 141:21 169:22 ensuring 166:2 entered 96:9 134:7 184:13 187:1 198:9 entire 11:15 71:13 182:17 183:21 197:5 198:5 entirely 126:2 entitled 115:10 entry 164:10 equals 35:8 71:8 err 78:20 82:16 83:7 85:6 185:17,20 187:21 errata 196:13 196:18 198:7 198:10,18 199:1 error 22:5 102:12 105:11 105:17 117:19 143:7 144:1 145:1 147:18 especially 108:20 esq 3:3 essentially 157:13</p>	<p>established 121:6 177:8 establishments 103:1 estimate 50:17 55:14,20,22 57:5,15 60:11 72:8,13 77:6 78:2,14 79:3 85:3 86:22 87:13 90:14 91:19 95:21,22 99:5 117:1,12 117:13 144:9 145:4,24 187:5 188:5 estimated 10:8 46:16 58:24 72:12 147:19 estimates 44:9 44:23 45:24 46:9,12,14 64:22 65:1,8 65:10,20 68:15 77:7,16 78:8 80:3,5 88:5 90:4 91:2 94:23 96:2 97:4 112:15 188:3 estimating 57:7 83:1 estimation 78:21</p>	<p>et 1:4,7 194:8,9 196:6,6 197:3 197:3 198:3,3 everybody 103:17 154:3 everybody's 156:24 evolve 34:12,13 34:20 evolved 33:7 exact 38:21 39:2 46:15 59:20 66:18 80:3 160:6 exactly 53:3 68:15 97:16 128:20 132:9 examination 1:11 4:2 6:6 180:16 182:6 190:21 examine 188:2 189:7 examined 6:5 example 12:8 22:1 32:8,10 43:23 49:20 50:4 51:10 56:2,3,14 57:1 57:17 68:2 92:1 96:15 105:2 106:2,5 112:7 125:17 125:22 133:17 136:11,21</p>	<p>138:5 139:8 142:20 149:3 163:11 165:22 170:15 171:1 178:21 examples 32:18 130:23 excel 21:13 49:4 55:5 66:9 70:10,13 77:23 exception 7:13 excised 17:21 excited 89:9 exclude 43:22 112:7,9 131:9 131:15,17,19 175:24 179:16 excluded 176:6 exclusively 51:18 excuse 129:23 executed 198:10 execution 197:14 198:19 executive 11:11 11:14 27:14,15 150:4,7 151:5 exhibit 5:4,5,6 5:7,8,9,10,11 5:12 32:12 38:11,15 61:20 61:22 62:3 64:13 66:5 67:19 98:4</p>
--	--	--	--

<p>99:19 102:10 112:17 115:5,7 117:21,23 154:7,9,11 161:15,16,19 166:11,12,14 171:21 180:18 180:18,20 exhibits 66:1 exist 139:11 existed 104:3 185:11 existence 104:5 existing 113:15 122:20 125:1 expand 119:6 expanded 38:3 expensive 114:12 experience 20:17 119:10 147:4 experion 140:17 expert 13:19 expiration 197:19 198:25 199:25 explain 22:10 25:8 29:3 40:14 44:11 45:23 76:1 82:9 86:2 93:3 131:20</p>	<p>explained 129:12,19 130:17 explaining 164:11 explanation 142:19 explanatory 88:22 export 39:11 44:18 exports 41:3 42:5,7 49:13 55:12 exposed 192:11 express 17:1,4 152:23 153:17 expressed 147:17 expressing 19:6 153:4 expressly 7:14 extent 32:23 33:6 166:6 167:18 176:9 externally 22:7</p> <hr/> <p>f</p> <hr/> <p>f 34:3 fact 48:18 82:24 84:4 93:19 102:4 179:20 factored 114:2 fail 125:14 126:14,20</p>	<p>134:23 fair 7:8,20 13:11 21:16 23:9 31:17 34:17 37:8 43:5 52:8 62:23 82:22 84:7 91:4 96:8 103:9 113:10 114:7 116:7 120:10 125:9 135:12 137:15 186:20 192:2 fall 192:13,15 familiar 34:15 37:4 39:1 40:12 43:11 58:19 100:2,5 122:11,20 129:18 162:3 familiarity 20:18 142:16 family 18:10 family's 17:16 far 37:12,13 58:6 71:5 83:17 100:4 109:9 117:12 136:23 177:17 fatigue 174:21 175:11 176:7 fatohi 10:7 29:2 feasible 134:9</p>	<p>features 125:13 126:24 135:20 february 14:4 102:24 federal 98:20 192:22,24 feedback 171:22 172:3,7 173:21 feel 20:24 73:1 114:20,22 123:21 124:3 141:15 148:22 150:24 felt 31:3 60:5,6 97:24 104:9 108:18 119:8 120:10 141:11 147:14,17 149:2 female 25:18 fewer 189:15 189:17 ffl 108:13 ffls 104:12 field 155:10 168:2 174:10 174:13 fielded 101:20 101:24 102:18 103:3 104:4 fielding 111:7 fifth 188:10 figure 55:7 58:8 69:8</p>
--	---	--	---

<p>85:13 88:13 figures 145:1 figuring 61:6 fill 25:6 54:14 73:1 79:15 83:5 84:21 113:21 filled 72:3 91:8 106:20 109:14 filling 70:21 74:20 163:23 final 76:20 103:14,18,18 103:20 142:7 146:4 148:7 162:12 163:1 163:11,12,16 168:22 170:8,9 174:1 175:19 176:12,15 178:9 finalized 103:12 152:21 153:16 finally 186:8 financial 27:12 find 26:1 47:2 53:17 57:24 59:18 84:13 96:14 196:11 finding 133:13 findings 23:22 116:15 150:14 150:15 153:6</p>	<p>finished 36:1 fire 35:2 193:3 firearm 10:14 13:8,9 33:15 35:11 39:10,11 44:18 56:20,21 58:2,4 60:22 64:5 75:7,14 95:8 100:24 101:2,6,7 102:20 104:2,8 107:1 109:16 112:17 116:24 129:14 130:11 130:13 139:1 152:13 169:13 172:22 173:3 178:23 firearms 12:17 12:21 13:5,14 13:20 15:1,3,6 23:14 24:21 29:24 44:18 48:7 75:18 79:4 83:15 95:2,6 99:23 100:10,21 108:16 111:18 135:13,16,17 187:6 191:18 192:3,12,20 fired 35:9 firm 118:17 first 6:4 12:15 15:14 24:6,15</p>	<p>25:18 37:14 44:16 45:2 48:23 67:13 80:15 93:5,5 98:5,11 115:18 119:2 120:18 130:2 137:17 137:20 139:8 140:15 147:13 158:18,23 160:8 163:18 164:15 168:11 172:20 178:1 179:17 183:22 184:12 188:11 194:11 firsthand 146:22 148:2 fishing 140:19 fit 165:7 five 39:20 48:11 51:7 57:13 59:2,9 60:3 74:9 flip 42:13 85:15 162:7 florida 118:18 fluctuation 147:2 148:1 focus 20:12 151:15 161:4,8 161:8 165:5 focused 12:19 20:9 29:2 35:7 36:5 37:2</p>	<p>51:22 104:15 107:13 folks 17:23 21:2 61:15 93:13 104:13 106:16 121:11 133:20 145:18 161:7 163:14 165:9 follow 76:8 89:7 182:5 followed 139:2 following 53:24 69:22 171:11 follows 6:5 footer 170:23 170:24 foregoing 194:17,21 197:13 198:18 forgetting 48:13 forgot 181:16 form 29:4 37:1 50:20 52:14 83:19 87:4 90:12 99:4 108:5 109:18 114:8 120:2 140:9 145:7,16 146:11 185:24 189:3,22 191:21 formal 20:4,22 26:3</p>
--	---	---	--

<p>format 66:9 162:11 formatted 117:20 formula 22:19 58:12 105:4,22 106:9 143:10 formulas 22:18 formulated 149:16 fortunately 182:13 forums 139:22 140:1 forward 31:15 32:17,23 91:9 112:3 128:8 196:15 found 31:10 84:14 183:11 185:10 foundation 10:23 11:12 14:20,21 15:21 42:18 102:22 109:18 161:22 four 19:2 40:10 51:7 57:13 62:15 151:9 173:14 176:24 188:7 fourth 69:17,21 frames 75:7 free 101:13 106:21 197:14</p>	<p>198:20 freedom 26:19 friend 77:19 friends 108:15 front 66:19 full 8:2 75:14 106:21 142:7,9 function 70:12 160:10 further 4:6 53:1,4,13 54:13 98:2 131:21 133:24 134:3 142:18 153:14 177:15 182:6 190:16 193:9 194:10 194:20,23 195:3 future 153:19 fuzzy 72:15 109:8</p>	<p>gathering 88:17 103:11 160:2 geared 139:1 general 2:15 6:10 10:22 13:15 34:22 59:11 72:6 73:10 105:14 114:4 125:12 145:14 generalized 176:1 generally 21:24 23:10 47:22 58:19 135:10 141:22 162:3 generate 73:12 90:3 101:15 117:11 146:7 149:5 187:5 188:4 generated 79:3 135:7 getting 106:17 110:2 124:8 125:7 155:14 172:11,14 176:18 184:20 gift 134:22 give 7:24 32:8 50:17 51:10 62:6 73:16 89:8 90:13 97:4,12 99:16</p>	<p>102:17 117:20 133:7 140:23 161:16 162:5 172:5 178:10 180:10 given 53:19 78:2 95:11 96:11 132:1 189:18 194:14 194:19 gives 142:8 giving 93:15 108:23 go 6:17 17:23 26:19 27:5,10 27:13 32:23 36:20 37:1 46:6 48:4,5,14 48:20 49:10 52:4 57:12,17 61:5 62:15 70:15 72:20 78:23 84:11 86:5 90:17 94:5,8 96:5 101:2 106:9 108:7 112:21 121:19,20 127:24 139:14 140:15,22 141:5 144:4 157:4 174:2 176:10 187:11 188:9,11 191:22</p>
	g		
	<p>g 2:16 3:7,8 110:11,11 gain 178:11 gained 23:23 179:5 gaining 47:20 game 177:11,11 garde 141:1 garner 106:12 gathered 67:21 121:16</p>		

<p>goal 81:19 137:8 going 20:22 23:3 51:20 52:15 54:22 60:17 71:8 73:15 75:23 76:8 79:9 82:11 86:3 94:6,11 101:19 104:24 108:20 109:9 110:13 110:21 115:4 117:20 120:4 121:3 125:12 127:12 131:11 132:4 134:17 140:11 143:23 148:20 149:16 152:14 156:19 156:24 161:3 177:2 180:22 183:3,21 184:18 gonna 11:6 22:13 31:7 46:21 57:12 75:2 76:20 106:3 141:3 145:12,13 146:20 147:24 149:24 164:1 184:6 good 6:8 41:16 42:22 60:2</p>	<p>69:1 70:20 71:6 87:19 93:18 106:14 114:11,23 120:6,6 122:2 122:13,13 123:4 129:19 136:22 139:17 158:21 goods 122:11 google 84:15 144:6 gotcha 125:16 126:14 127:15 128:4 government 29:9,12 grand 116:24 grant 12:19,19 13:12 graph 45:4 graphics 40:4 88:10 great 180:5 grocery 59:18 ground 6:17 155:15 group 20:12 93:13 141:6 192:12 groups 11:18 107:10 151:24 growing 151:16 guarantee 61:2</p>	<p>guess 104:9 127:23 149:18 guessing 53:16 54:9 gun 25:18 34:15 127:5 135:9 136:17 192:24 193:1,2 guns 13:17 24:23 34:4,4 101:1 157:1 192:22 193:6 guy 77:18 92:9 108:13 126:6,7 180:3 guys 46:6 141:14 143:3</p> <hr/> <p style="text-align: center;">h</p> <hr/> <p>h 5:1 11:21 26:24 110:11 167:2 half 41:1 43:10 73:18 halfway 172:10 hand 6:16 33:18 66:2 116:8 173:8 195:8 handful 49:24 51:4 91:21 handgun 25:19 33:11,18,22 34:14 48:10 74:17,18</p>	<p>handguns 13:17 24:23 36:21 74:10 handled 88:8 handles 28:21 handy 60:4 happen 99:13 happened 99:14 150:18 153:23 188:24 happening 99:14 happens 33:2 happy 47:6 89:9 110:5,6 123:14 125:3 143:5 147:4 153:2,22 154:6 harder 105:23 hate 93:9 hats 11:21 hazinski 2:17 4:4,6 6:7,9 9:12,19 29:13 38:6,9,17 39:4 50:22 52:17 61:19 62:1 66:1,7 71:17 71:19 79:1,17 83:23 84:1 87:14 94:2,6 94:11,13 99:15 99:21 102:12 102:13 105:13 106:10 109:2</p>
--	---	--	---

110:9 114:15 115:4,9 117:16 118:1 131:7 137:12 141:18 144:17,20,22 145:21 147:6 151:19 154:7 154:13 161:15 161:21 162:1 166:11,16,18 176:16 180:10 180:12 182:5,7 184:16 186:12 188:11,17 189:2,4 190:16 191:21 he'll 193:12 head 106:8 167:13 heading 33:16 41:1 43:15 hear 18:10,21 37:14 79:13,13 79:14,15 187:20 heard 76:7 78:22 186:8 187:19 hearing 155:7 heavily 114:2 119:1 133:13 heavy 21:12 40:1 173:23 help 11:19 12:9 23:23 25:14	50:23 88:4,14 89:6 109:21 118:24 119:11 123:7 133:14 138:16 139:18 164:20 168:13 169:3 170:18 179:5 helped 31:11 61:15 67:1 119:19 123:1 141:15 helping 40:8 45:3 hereinbefore 195:2 heretofore 194:3 hereunto 195:7 hey 50:8 86:19 88:12 89:8 122:21 124:10 125:17 126:23 128:19 153:12 179:2 187:16 hidden 70:1 high 21:18 32:5 106:5 116:17 120:11,20 126:18 133:18 140:20 142:8 150:22 182:21 184:9 higher 105:23 117:12 146:15	highest 19:9 31:9 highlight 81:1 highlighted 80:16,21 85:11 98:6,10,12 highlighting 80:20 81:2,13 85:12 hile 167:2,5 173:16 hile's 167:11 hire 12:5 hiring 23:3 124:23 history 119:9 hoerner 3:9 hold 59:6 holding 35:1 110:24 holes 54:14 83:10 home 172:21 173:4 177:12 177:20,24 178:6,16,23 179:2,13,21 honest 176:14 hope 77:20 135:11 hopefully 53:5 107:3 horn 93:19 host 139:22	hour 1:18 10:4 11:9 hourly 11:7,8 hours 191:3 house 21:17 hr 27:18 huge 114:1 hundred 22:11 22:12,14 45:9 52:5 54:9 61:17 73:23 76:3 86:4 95:18 97:20 98:15 101:14 106:2,7 143:23 143:24 187:12 189:8 hundreds 40:17 72:2 hunt 39:17 61:3 hunters 11:19 11:22 hunting 12:6 24:2 26:23 39:16 101:2 139:2 177:10 hypothetical 52:16 53:5 105:20 136:17 137:6 145:8 hypothetically 53:14,14 56:7 136:8,14 146:6
--	--	---	--

<p>i</p> <p>identification 5:2 38:16 61:23 66:6 99:20 115:8 117:24 154:12 161:20 166:15</p> <p>identified 111:9 144:14</p> <p>identifies 45:6</p> <p>identify 48:15 79:11 109:10 110:22</p> <p>identifying 45:13 92:18</p> <p>iirs 39:14,20,22</p> <p>ilag.gov 2:21 2:22</p> <p>illinois 1:2,15 1:17 2:8,14,19 6:11 14:12,13 14:15 194:2,7</p> <p>imagine 26:8 36:5</p> <p>immediate 40:3 153:24</p> <p>immediately 27:23</p> <p>import 39:11 49:8</p> <p>important 25:22 28:14 149:7 150:4 158:3</p>	<p>imported 42:6 49:11 55:11,24</p> <p>imports 41:2 49:13</p> <p>impressed 120:16 141:14 143:3 145:19</p> <p>improve 32:17 160:24 168:15</p> <p>inaccurate 65:10</p> <p>incentive 106:20 126:12</p> <p>incentivize 107:3</p> <p>incident 140:20</p> <p>include 35:22 36:2,21 37:10 78:7 112:7 127:22 128:7 131:14 174:15 175:24</p> <p>included 30:19 65:16 175:10 180:2 191:18 192:4 196:13</p> <p>includes 60:24 117:4,8 163:19 168:12</p> <p>including 66:10 125:4 134:19 166:4 177:24 178:3</p> <p>inclusion 169:22</p>	<p>incomplete 52:16 105:19 137:5 145:7</p> <p>incorporate 173:20</p> <p>incorporated 198:12</p> <p>incorrect 72:13</p> <p>increase 107:3</p> <p>increased 148:13</p> <p>independent 73:5 128:23 175:9,22</p> <p>independently 176:5</p> <p>indicate 42:20 111:16 171:3 178:15</p> <p>indicating 196:13</p> <p>indication 102:17 186:18</p> <p>individual 104:14 106:22 161:8 166:8,10 179:24</p> <p>individually 50:24 51:1,5 91:18</p> <p>individuals 135:8 136:1</p> <p>industries 59:17</p>	<p>industry 12:6,6 12:18 13:20 15:3,4,15 23:14,16 25:14 39:9,15 44:8 44:23 45:24 46:2,5,9,18 59:22 62:24 63:20,22 64:18 64:22,24,24 65:10 100:21 102:21</p> <p>inflate 185:18</p> <p>influence 165:14,17 169:13</p> <p>influenced 160:11</p> <p>influencing 159:22 160:23 164:21 166:1 168:14 169:3</p> <p>inform 145:24</p> <p>informal 26:4,5</p> <p>information 30:11 34:3 41:6 44:15,20 45:19 47:9,13 53:13,17,18 67:21 68:4,6 70:13 72:20 74:1 87:12 91:16 92:3 93:16,21 95:5 96:14 99:3</p>
---	--	---	---

102:22 109:15 122:16 123:12 123:18 124:17 124:19 135:2 137:18 138:1,2 139:15 143:14 150:7 156:2,13 159:11 160:3 161:5 163:22 178:4 184:13 189:20 informed 23:17 147:16 initial 113:22 134:5 188:3 189:5 initials 173:15 ink 81:10 insight 165:8 insights 12:2 12:10 23:23 159:20 160:9 164:20 168:13 169:2 170:16 171:13,15 178:11 179:4 180:3 instance 12:11 67:14 191:7 instances 53:22 72:16 90:16 97:23 121:8 122:24 124:5 127:19,20	instant 99:9 institute 20:8 20:12 instructed 7:14 instructions 165:19 intelligence 39:15 62:24 63:20,22 intelligent 39:9 intention 157:13 interest 25:24 124:14 interested 26:2 177:17,18 195:5 interests 28:24 interfere 7:23 internal 103:22 108:19 112:23 161:13 174:3 internally 21:11 22:7 36:6 101:15 110:1 international 44:21 interpose 7:11 interpret 149:21 interpretation 186:19 interrupt 9:7	interval 142:9 146:8 intricate 81:17 intro 129:7 introduced 8:14 128:6 introduction 129:12 165:11 introductory 130:18 164:4,5 invasion 172:21 178:23 involved 27:4 39:24 40:8 42:8 91:1 101:17,22 103:10,17,19 119:22 125:5 133:13 139:5 165:19 167:19 171:5 173:19 187:3 involvement 88:7 115:21 167:17 involving 29:23 ish 104:7 issue 24:18 30:7,14 155:18 170:3 172:11 172:14 176:19 176:22 177:3 issued 43:4 55:19 113:16	issues 32:18 it'll 50:10 53:5 itc 44:8,22 48:4 49:8 59:24 64:18 item 102:1 items 75:10 iterations 39:3 64:5 163:7
j			
james 2:5 8:4 january 14:3 26:22 27:5 43:3 63:12 64:3 jargon 93:11 jim 1:10 4:3 6:3 8:15,16 9:13 10:1,2 12:12 29:6 70:24 82:5 85:22 89:5 171:22 172:1 180:24 194:5,11 196:8 197:4,9 198:4 198:13 199:20 job 56:21 143:13 joe 27:16 john 2:17 6:9 17:18 27:18,18 76:17 126:23 181:14,14 john.hazinski 2:22			

join 191:2	36:4 44:24	37:12,13 38:3	100:7 101:11
judgments 26:11	46:1 68:6 73:3 75:1 81:6 83:4	38:21 39:2 40:10,17 42:10	101:24 102:5 103:4,14 104:2
july 157:9 196:4	83:7 93:11 98:18 100:2,4	44:12,14 46:4 46:14,17,18,20	104:6,23 106:4 106:22 108:7
june 1:17 194:4 195:8	100:19 102:2 116:2 127:23	46:23 47:4,17 48:10,14,18,20	108:13 109:3,8 109:24 110:4
jvogts 2:11	132:18 134:15	48:24 49:2,19	110:19 111:3,7
k	141:15 142:18	50:4,9,9 51:22	112:5 113:21
keen 8:9,12 10:21,21,22,24 18:23 27:16 174:4	146:13 147:23 150:23 157:5 164:14 173:12 177:7,15 182:1	52:1,2,6,22 53:2,16,18,21 53:23 54:10,11 55:17 56:4,9	113:24 114:10 116:17 118:24 119:7,15,17 120:15,20
keep 13:2 16:11 26:6 32:6 77:14 173:3 180:22 189:2	183:12,16 188:14,16	56:10,16 57:4 58:6,14 59:16	121:4,12,14 122:1,5,9,21 123:2,6,24
keeping 191:4	kinds 13:15	60:2,7 61:3,5	124:2,4,7,11,12
keith 119:24 123:22 124:13 128:16 140:12 141:12 143:13 167:7,8 172:7	knee 155:14 knew 47:16,17 51:21 52:2 53:2 57:4 68:4 87:11 93:10,10 93:19 133:9 170:1 180:8	61:12,14,16 62:17 65:19,21 69:4 70:19 72:2,18,19 74:17 75:4,9 75:12 76:2,8 78:23,24 79:16	124:14 125:1,2 125:11,15 126:3,7,13,17 126:18,19,23 127:3,5,9,15,18 127:19 128:3,5 128:15 129:10 130:14,19
kelly 6:11	know 9:2,20 11:2 12:10,15 19:24 20:22 23:24 25:13,14 26:16 27:21,23 28:17,21 29:6 30:2,5,16,17 31:3,10,13,16 31:22 32:1,2 33:12,17,21 34:10,12 35:13 36:3,7,18,23,24	80:12,21 81:11 82:4 83:6 84:10,11,14,20 85:4 86:5,5 89:5,7,9,10 91:9,10,12,21 91:23,24 92:1 92:9,11,12,14 93:7 95:21,22 96:21 97:2,9 97:11,12,20 98:16,23 99:12	128:15 129:10 130:14,19 131:20 132:4,5 132:7,8,12 133:4,13 135:16,20 137:8 138:7,11 138:12 140:4 140:18 141:2 141:19,24 142:1,21 143:6 143:11,21
kenny 27:17			
kept 16:8 157:2 176:12,13 186:8			
kerry 3:10			
key 28:15 81:6 150:8			
kid 126:17			
kids 18:10,21			
kind 12:7 24:15 26:3,19 31:19			

144:4,5,13 145:4,15 146:4 146:18 147:3,3 148:3,20 149:3 149:4 150:2,5 150:23 151:6 151:14,20 152:5 153:9,13 154:1,3,4 155:14,24,24 156:9,11 157:7 157:17 158:12 159:5 160:12 160:13 161:3 162:12 163:5,9 163:15,16 164:9 165:18 165:19 167:11 169:16,18,20 169:24 171:17 172:3 173:11 173:22,24 174:17,20,21 174:24 175:5,6 175:19,20,23 177:22 178:7 178:19 179:9 179:10 180:1,7 181:12 182:8 182:10,15 183:5,7,11,17 183:23 185:7 185:11,19 186:5,22,23 187:10 190:13	192:12,23 knowing 145:14 182:16 182:16 knowledge 23:5 44:24 46:1,3 48:15 51:22 53:2 63:15 65:2,15 80:19 84:10 105:22 110:13 111:9 115:24 116:2,11,14 128:16 139:24 147:12 149:8 knowledgeable 46:5 known 93:9 138:22 145:11 kwame 1:7 6:10 194:9 196:6 197:3 198:3	185:5 lapse 90:8 lapsed 16:12 106:18 large 14:14 27:1 100:23 147:9 180:18 larger 104:16 104:17 105:17 larry 8:9,12 10:20,21,22,24 18:23 27:16 174:4 lasalle 2:18 lateral 16:13 latest 18:11 law 14:12 56:14,19,19 57:3,9,21,24 58:2,3,8 60:13 61:1 148:11,24 151:8,12,17 152:9 192:22 192:24 lawsuits 29:20 29:23 lawyer's 32:14 lawyers 7:10 30:8 lead 17:18 61:14 learn 89:12 178:12 learned 20:21 30:22	learning 69:2 104:16 leave 53:19 left 12:16 14:19 18:2,22 19:7 21:2 26:18 27:22 41:19 63:12 64:3 102:4 155:12 157:8 175:20 legal 16:23 196:1 199:1 legislation 28:16 29:3,15 legislative 16:23 28:1 letter 196:19 level 18:20 19:9 19:18 22:16,21 105:1,9,11,16 105:24 106:5 133:18,19 142:8,12,15,22 143:6,20 144:3 144:7,24 145:3 145:10,16 147:11 152:2 levels 101:12 143:15 150:23 lever 92:13 license 1:24 licensed 1:15 194:2 licenses 39:16
	I		
	I 167:2 laid 66:19 135:22 landing 164:8 164:10,14 language 45:5 92:20,24 133:4 165:11 166:5 168:12 169:21 169:23 170:5,6 170:11,13		

<p>life 12:20 17:21 28:20 136:10 lifting 40:1 173:23 likely 53:18 81:8 87:7 97:11 102:4 106:16 107:17 114:6 152:19 156:21 171:4 177:4 limited 84:18 limiting 135:6 line 48:5,5 51:21 52:5 54:11,23,23 65:6 71:17 74:22 120:14 138:9 187:11 196:13 198:7 199:3 lines 9:4 18:12 19:4 92:2 96:24 107:5 link 162:14 list 25:5,7,17 26:6,10 37:2 48:22,22 49:4 51:3 54:4,7,21 70:7 125:19 139:2 141:10 159:3 163:2 listed 44:22 49:22 50:11 54:18 72:19</p>	<p>75:10 95:18 139:8 172:17 174:15 178:1 178:17 190:4 198:7,17 listen 191:5 listing 198:7 listings 84:24 lists 107:10 literally 45:18 litigation 24:5 24:8 25:3 28:16 29:16 little 54:15 70:2 72:10,15 76:12 90:6 93:18 101:15 104:23 109:8 130:17 130:21 132:3 141:1 149:13 157:22 159:4 182:5 191:23 live 146:16 living 143:4 llc 12:1,2,3 llp 2:3 logic 162:20 long 10:3 13:17 24:23 25:5,17 26:10 34:4,4 72:1 80:24 88:7 89:4 97:18 103:5 174:23 188:15 188:20</p>	<p>longer 34:15 94:4 look 38:20 39:5 40:4,13 44:1 52:1 54:10 55:1 60:18 62:6 63:4 64:14 80:3 82:3 83:15 84:9,24 85:9 88:9 106:9 111:10 112:16 112:22 115:18 116:18 128:2 129:22 150:9 151:14 153:14 155:16 162:23 164:1,3 174:4 looked 9:5 40:11 46:4 62:2 67:19,24 79:10 100:15 112:12 116:18 139:17 145:10 182:20 looking 12:5 36:20 37:1 53:7 54:16 63:1 64:12 68:4 76:12,17 77:23 78:16 81:6 82:2 92:17 98:13,23 99:11 103:13 103:15 123:23</p>	<p>126:22 129:15 129:21 130:19 167:14 177:2 187:4 192:23 looks 34:14 39:1 40:11 61:17 63:4,12 67:15,23 71:6 72:13 82:11,17 84:14 86:7,16 111:20 113:12 130:7 149:6,12 152:6 157:8,9 158:19 159:8 164:4 167:6 183:7 lose 138:16 losing 47:20 lost 188:14,16 lot 24:6 25:7,23 28:4 30:8 31:23 37:23 46:3 52:15 66:20 67:15 70:18,19 72:13 76:16 77:18 79:10 80:21,22 80:23 84:20 93:10,20,20,22 95:23 104:12 116:17 118:23 123:12 128:8 129:18 138:1 138:11 141:14 150:6 163:7</p>
--	---	---	---

175:6 177:10 180:6 182:12 lothson 2:4 4:5 9:18 29:4 38:24 50:20 52:14 71:16 78:9,12 79:6 83:19 87:4 93:24 94:4 102:10 105:19 108:5,7 109:18 114:8 130:24 137:5 140:9 144:15 145:7 146:11 150:20 166:6 176:8 179:22 180:15 180:17 182:3 184:15 185:24 188:6,24 189:22 190:1 190:17 193:11 196:5 lots 52:23 191:17 love 175:5 low 78:23 140:20 lower 105:24 lowered 175:3 luckily 127:9 lumped 50:6 lunch 94:7,14 luxury 127:12	m m 34:3 71:8 74:13,14 m1 191:7,10 maag 3:8 4:7 190:19,22 192:1 193:9 machine 192:22,24 193:1,2,6 mad 31:7 163:9 madam 196:10 made 16:7 27:13 31:23 32:6 44:2 46:22 47:6,10 48:16 50:4 51:8 52:22 71:3 75:13 76:20 78:17 87:23 97:6 98:1 99:8 104:8 127:4 157:24 165:2 171:17 174:11 174:14 175:19 176:14 178:9 181:2 182:23 183:23,24 184:5 185:9 186:5 197:7 magazine 10:16 24:22 30:18 35:2,6 58:17,23 59:7	60:9,23 61:13 65:12,18,20 111:1 112:24 113:11,17 114:11 115:10 117:1,5 130:5 130:16,21 131:6,23 192:10 193:3 magazines 14:14 29:24 30:3 59:1,4,6 59:14 60:12 112:15 113:7 113:14 114:1,4 114:18 117:12 main 9:4 30:1 48:11 161:4 major 32:16 majority 16:22 43:24 49:22 52:24 53:9 56:5 88:8 89:5 91:23 92:6 97:1,9 99:8 178:22 make 6:17 7:15 23:18 25:15 26:11 27:3 31:6,8 32:22 33:4 40:4 46:24 47:3 48:17 49:18 59:2 75:2 79:14 81:20,23	85:2 88:9 90:18,20 92:2 98:16 109:15 110:8 115:2 122:5,8 123:2 123:7 124:21 125:8 129:19 135:5 138:4 147:16 152:4 153:14,24 157:22 165:6 166:1 174:7 177:14 180:5 181:21 185:15 makers 88:15 makes 41:13 47:21 167:21 177:3 179:14 185:13 192:3 making 32:12 50:11 70:15 81:19 121:22 127:13 138:14 146:18 157:19 163:9 173:19 malfunctioned 114:12 managed 15:21 15:24 management 19:11 20:7 119:3 manufactured 13:16 51:18,19 52:12 114:5
--	---	---	--

<p>manufacturer 13:10,11,14 44:2 48:6 50:16 51:1 53:13 54:9 56:17 68:8,10 69:11 77:6 90:17 96:4,16 96:22 138:5 160:9 181:7,10 181:13,22 182:9,16,22 183:15 184:2,7 184:9,21,24 186:15 187:4 187:16,19 188:2 189:7,19 190:7,13 manufacturer's 53:8 159:20 187:10 manufacturers 12:17,21 13:5 13:7 15:2 36:19 47:10,13 49:22 51:16 52:10 68:14,22 77:16 89:23 90:13 91:17 92:4,7 93:3,15 95:2,5 96:2,11 97:4,16 99:3 104:17 185:19 manufacturing 44:18 52:10</p>	<p>54:5 56:24 57:1 march 102:3,24 103:5,15 margin 22:5 105:10,17 143:7 144:1 145:1 147:18 marginal 173:7 mark 42:16 marked 38:15 61:22 66:5 99:19 112:17 112:23 115:7 117:23 154:11 161:19 166:14 market 15:6,7 15:8 16:5,11 23:17 25:19,19 25:20 47:15,19 47:20 56:6,12 60:9 121:14 122:11 132:7 132:18 135:13 149:23 151:11 151:15,23 156:24 157:5 marketer 149:13 marketing 118:13,16 119:7,13,21 120:1,3,22 121:17 122:9 122:17,22</p>	<p>123:3,16 124:19 125:8 128:5,12 133:6 133:10,21 134:18 140:13 141:20 144:5,9 145:18,22 149:3,14 151:1 152:22,24 153:5,17 155:24 156:9 156:13 157:11 167:7,12 168:21 169:1 172:8 178:20 179:1,5,8,14 marketplace 149:12 160:14 markets 34:12 132:6 martin 2:3 match 108:24 materials 84:20 math 21:14 mathematical 124:20 mathematically 87:1,6 mathematics 124:24 matter 114:4 146:19 147:9 158:4 max 175:1</p>	<p>mcnamara 17:18 mean 25:8 34:23 46:13 68:1 72:5 84:17 93:4 124:9 129:5 137:24 141:13 148:18 153:9 183:20 186:22 190:24 meaning 14:1 43:19 132:15 means 15:5 22:10 44:11 71:12 76:1 81:13 82:9 86:2 108:1 134:12 135:6 142:24 186:2 meant 45:23 71:15 81:1,7 media 29:8 40:5 medical 7:22 medication 7:23 meet 22:22 meeting 10:3 member 23:15 25:12 29:9,10 44:14 62:13 100:21 106:16 106:16 109:12 152:3</p>
--	--	---	--

<p>members 23:16 25:13,24 32:2 40:6 46:19 47:8 59:14 60:7 81:20 84:20 100:23 100:24 105:2 107:8,18 108:2 108:3,10,21,22 108:23,24 109:10 110:3,4 111:5 121:13 123:7 138:3,10 138:16 139:20 147:15 149:3 161:5,6,7,9 165:6 177:23 178:11 185:17</p> <p>membership 21:13 25:4,9 26:1 30:11 31:4 101:5,9 101:12 104:7,9 107:21 123:9</p> <p>memories 67:10 77:21</p> <p>memory 158:19 175:23</p> <p>memory's 70:19</p> <p>mention 110:14</p> <p>mentioned 9:13 10:5,20 29:19 46:2 48:9 51:13 67:24</p>	<p>100:9,10 132:19 195:2</p> <p>merrick 20:7</p> <p>met 9:23 10:2</p> <p>method 107:15 182:15</p> <p>methodologies 43:12 152:23 153:19 154:3 157:16 159:6</p> <p>methodology 47:23 59:11 63:15 89:14,15 113:3,6,19 116:1,3,8,19 117:11 120:3,6 121:1,5,24 122:14 125:4 133:2,10 142:4 154:1,4,5 157:14,21 158:5,15 159:5 159:19 166:3</p> <p>methods 20:19 89:1,2 119:9</p> <p>microsoft 144:6</p> <p>middle 133:23 172:21 176:17</p> <p>midwest 196:17 199:1</p> <p>military 56:18 56:24 57:6 148:11,24 151:8 152:9</p>	<p>million 50:11 55:23,23 57:8 57:17 58:12,24 60:19 117:14 143:23</p> <p>mind 30:20 32:19 58:11 90:6 119:18 141:5 165:21 183:10</p> <p>minimal 148:4</p> <p>minimum 22:2 22:6 23:2 142:22</p> <p>minus 42:5 133:18 142:10 142:11</p> <p>minute 62:6 126:7 133:7 162:5 174:23</p> <p>minutes 38:24 94:12 126:4,4 144:21</p> <p>misc 71:8 74:4 74:7,12 75:5</p> <p>miscellaneous 48:11 69:15 74:14,15 75:1 75:6,9,11 76:5 76:19 82:13 86:12</p> <p>misconstrue 92:16</p> <p>misinformation 31:5</p>	<p>missed 54:3</p> <p>missing 191:23</p> <p>mission 11:18</p> <p>misspoke 131:2</p> <p>misstates 50:20 78:9 79:6 83:20</p> <p>mistake 87:23</p> <p>misunderstan... 129:20</p> <p>mix 72:23 79:12 86:20 97:22 182:17 187:17 190:14</p> <p>model 96:5</p> <p>models 95:8 96:6 191:17 192:3</p> <p>moderation 20:12</p> <p>modern 10:14 24:21 25:20,22 30:2,17 34:22 34:24 35:13,14 35:15,17,22 36:10,17 37:9 37:14 38:2 41:1 42:5,6 43:16,22 44:2 47:10 48:16,17 49:2,16,20 50:1,6,18 51:9 51:18,23 52:7 52:13,22 53:9 53:11 54:24</p>
--	--	--	--

55:3,11,14 56:2 57:18,19 58:11 60:21 67:2 68:16,21 69:11,13 73:21 76:22 79:12 82:19 83:2 86:9,17,21 87:9 90:4,14 90:23 92:5,7 92:10,21,24 93:6,11 94:23 95:12,16,19 96:6 97:13 109:5 110:19 110:22 111:8 111:14,16,24 112:3 118:8 123:8 125:18 125:21,23 129:5,12,17 130:15 132:15 132:19 133:15 134:6 135:15 136:2,4,6,20 137:10,15,18 138:9 139:15 140:6,23 144:10 148:23 149:9 152:8 154:16 155:21 160:3 161:22 169:17 177:5,9 178:6,12 179:4 179:9,12,19	187:7,13 189:10,15,19 190:6,10,15,23 191:8,10,13,19 192:5,8,18,21 193:7 modified 153:20 mom 104:12 moment 66:2 117:17 178:2 180:10 187:23 190:17 moments 82:2 money 46:22 138:11,14 month 8:10,13 65:23 morning 6:8 mortar 104:15 mouth 191:4 moved 28:2 31:15 moving 32:17 112:3 128:8 msr 50:13 58:8 71:3 77:8,15 78:2 88:5 99:3 109:11 131:8 131:21 134:7 134:14 135:7 137:2 138:22 139:18,22 141:23 142:9 146:1,9 147:10	147:22 148:15 148:19 150:16 158:24 170:24 171:1 182:17 188:5 msrs 44:4 54:12,13 55:18 55:20,23 68:24 72:22 73:19 79:5 85:3 91:17 95:3,7,8 97:6 99:5,10 130:3,9 131:4 131:16,19 135:8 136:10 137:3 149:22 156:2 159:21 172:15 176:19 176:23 177:4 177:19,24 178:16 181:1 183:24 184:4 188:4 multiple 91:3 n n 4:1 22:22 110:11 name 6:8 8:2,5 27:19 68:8 106:15 139:16 196:6 197:3,4 197:15 198:3,4 198:21 named 167:2	narrowed 134:8 national 10:22 14:19,20 15:20 39:19 42:17 102:21 161:22 nationwide 110:3 118:17 141:6,8 nature 13:2 14:24 17:19 19:24 21:17 66:23 near 174:1 nearest 80:6 necessarily 103:11 necessary 90:1 need 22:22 38:22 71:4 75:15,16,16 94:1 98:2 105:6,16 106:4 106:6 140:13 140:18 145:4 146:14 174:18 181:3 182:21 184:1 185:3,9 185:11 needed 12:8 25:6 62:15 95:14 96:14 needs 159:21 160:3,9 171:11
--	--	--	--

<p>neil 119:24 123:22 140:12 141:12 143:13 neil's 128:16 nerdy 89:10 never 46:18 59:15 89:11 125:21 127:9 127:11 155:16 165:18 167:13 185:13 new 11:19 16:10 34:13 46:17 93:7 132:6,7,8,18 170:10 newsletter 139:9,12,12 newsletters 139:1 nice 26:19 night 172:21 nine 106:4,7 ninth 85:16 non 137:2 151:12,17 nonmilitary 151:16 nonprofit 11:16 north 1:16 2:6 19:16 notarized 196:14</p>	<p>notary 196:24 197:10,18 198:15,23 199:23 note 82:5 118:6 182:20 183:12 185:9 196:12 noted 73:7 notes 76:11 81:21 170:2 notice 65:6 122:21 194:24 noticed 120:18 november 167:3 170:1 nssf 3:3 8:9,18 8:22 10:11 11:6 12:16 15:14 16:2,13 16:17 17:1,3,4 17:9,11,17 18:3,14,22 19:5 20:24 21:4,8,16 23:1 23:4,11,13,20 24:3 26:15,21 26:24 27:9 29:8 31:11 33:1,8,12 34:11,19,24 35:20,24 36:1 36:15,24 37:10 37:17,18,20,21 37:22 38:12 39:12,21 40:22</p>	<p>41:10,17 42:14 43:1,9,12 47:8 58:6,23 62:12 62:13,16 63:14 64:9 65:19 66:10,21 70:12 91:12 93:6 99:23 100:7,19 100:20 102:7 103:7 105:2 106:12,15 107:9,18,20 108:2,3 109:3 109:10,12,13 110:1,3 111:4 111:11 112:23 113:17 115:13 115:18 116:22 117:11 118:7 118:19 119:2 119:14 121:13 121:15,22 122:17 124:6 124:11,14,20 125:6 128:13 129:23,23 131:21 132:14 132:23 133:5 133:10 138:3 138:16,18,23 141:20 142:7 144:9,24 148:6 149:2 152:3 153:18 154:15 154:20 155:12</p>	<p>155:18 156:12 158:9 159:1,20 160:8 161:5,6 161:7,11,23 163:19 164:4 165:12,13,16 166:7,17,22 167:23 168:5 168:19 169:1 170:12,14,23 170:24 171:1,1 171:10,21 173:19 177:17 177:18,22 178:2,4,10,11 179:16 180:19 nssf's 16:21 24:17 25:1 55:14,17,20 107:8 112:15 125:11 number 5:2 29:20 32:13 42:4 44:5 46:15 47:18 50:6,11 51:23 53:10 55:2,2,5 55:9,13,16,17 55:18,20,23 57:8 58:13 59:3,20 60:5 61:20 66:3 67:2 69:10 72:11,18 73:7 73:13 75:2</p>
--	---	---	--

77:13 78:18 80:7 82:7,13 83:18,21 84:15 85:3,7 86:11 86:18 87:2,3 88:8 90:21,22 95:2,6,10,11,17 95:20 96:7,7 96:17,17 97:7 99:5,17 102:1 102:14 104:8 104:11 105:6 105:15,17,24 107:17 109:5 113:13,14 114:18,23 120:20 144:10 146:1,17 148:3 156:1 159:16 161:17 180:20 181:6,16 182:8 182:18,23 183:14 184:7 184:12,20 185:19 186:10 186:15 187:1 187:14,16 190:7,8,12 196:7,13 numbered 69:18 numbers 36:20 40:4,17 46:14 48:8 49:6 50:14 76:18	77:22 79:16,20 89:10 94:24 96:11,20 97:10 102:11 117:11 125:7 144:13 147:20 186:3 189:13 198:7 numerous 192:3 o o 8:6 26:24 oath 6:21 94:20 object 29:4 83:19 102:10 166:6 179:22 191:21 objection 7:13 50:20 52:14 78:9 79:6 87:4 105:19 108:5 109:18 114:8 137:5 140:9 145:7 146:11 150:20 176:8 184:15 185:24 188:6 189:22 objections 7:11 obtain 22:23 124:1 obviously 57:11 68:3 106:14 124:12 170:2 occasion 42:23 62:14 70:22	88:12 107:2 odd 102:11 offered 53:8 187:6 office 2:15 officer 56:20 offices 57:2 89:19 official 197:15 198:21 oh 8:10 85:21 86:11 96:23 99:9 118:24 124:11 138:7 156:6 181:20 186:7 ohio 196:2 okay 7:3 9:20 33:8,9 34:6 39:1 42:15 43:8,15 45:23 49:5 51:7 52:19 54:12 60:19 62:4,8 64:10 66:12 68:9 69:7,16 69:19 70:3,19 71:22 73:19 80:14 85:11,21 89:24 96:5 102:15 105:6 111:12 116:23 124:10 127:21 130:7 131:2 132:24 133:9	134:2,20 136:14,19 140:19 145:12 148:8 150:21 151:10,15 154:7 155:1 158:10,13 159:10 160:8 164:3,16 172:19 176:11 181:6 183:10 190:8 192:20 old 6:16 8:17 173:14 once 17:12 18:11 27:22 109:23 114:4 146:15,18 148:2 186:7 one's 39:10 ones 16:11 28:13 48:15,19 53:2 89:3 95:24 96:22 98:13 100:8 108:11 143:14 ongoing 18:7 online 22:19 97:22 102:23 105:4 120:20 138:24 158:24 161:23 162:14 163:13 open 64:23 126:23 127:1,3
--	--	--	--

<p>129:24 operated 26:24 opinion 99:4 116:20 120:2 147:7 157:6 184:23 192:24 opinions 137:2 140:7 opportunities 17:22 121:13 opportunity 138:7 opposed 60:13 97:6 108:2 151:23 opposing 30:8 32:14 optic 107:4 orange 98:7 order 90:3 145:2 171:18 organization 11:15,16,17 18:4,23 21:8 21:19 24:10 25:12 100:22 121:17 170:6 170:11,13 organizations 56:15 133:14 141:11 orient 90:10 oriented 21:12 original 15:16 45:3,4 63:6</p>	<p>80:8 originally 24:7 33:13 34:8 35:20,24 58:20 65:22 66:21 113:18 186:4,5 originated 37:19,20 originator 43:14 outcome 195:5 outdoor 11:11 11:24 12:2,6 12:10 14:16 26:23 59:22 122:12 155:15 outreach 89:23 90:3,12 91:16 outside 15:23 56:3 77:15 119:4,5 121:17 overall 17:2 47:17 88:5 91:18 135:13 140:6 141:22 143:17 148:4 overcount 68:24 75:3 82:21 oversaw 61:10 100:6 oversee 102:5 103:6 overseeing 21:9 39:22 41:10</p>	<p>oversight 43:5 43:7 100:8 overview 102:17,19 own 16:16 26:20 30:24 36:9,13,15 57:24 58:2 61:1 81:3 93:19 107:8,13 107:20 108:15 134:5,6,21 135:18 136:4 136:20 151:13 154:4 169:16 169:17 177:17 179:24 owned 26:24 55:15,20 56:3 58:8 60:12 134:14 136:6 137:10 148:23 owner 136:18 137:2 142:9 owners 57:19 129:18 133:16 135:8,9 138:22 139:18 140:7 141:23 144:10 146:1,9 147:10 147:22 178:13 ownership 56:13,14 135:20 139:1 139:23 150:16</p>	<p>152:13 159:1 owning 135:8 owns 149:9,22</p> <hr/> <p style="text-align: center;">p</p> <hr/> <p>p.m. 94:10 144:21 193:14 page 32:12,13 32:22 39:6 40:21 41:1 42:14 43:10,15 44:7,21 45:8 45:15 58:18 60:11 61:7 63:3 64:8,12 65:13 69:17,21 69:21 70:1 71:18 80:15 82:2 85:9,17 98:5 102:6 103:21,22 111:10 112:23 112:23 116:21 118:12 129:22 132:22,23 133:1,5,23 138:21 142:7 148:5,6 154:19 156:12 157:10 158:7,8,11 159:10 163:18 164:4,8,10,14 168:5,11 171:20,22 172:10 174:15 176:17 179:17</p>
--	---	--	---

<p>180:21,22 196:13,15 198:7 199:3 pages 40:17 171:7 paid 14:1,4 painstaking 127:7 painstakingly 48:18 pair 133:24 134:3 paper 162:19 162:24 paragraph 130:2 133:17 133:23 142:7 148:7 158:23 164:19 168:12 168:16 170:5,6 170:12,14,15 170:17 171:6 paragraphs 163:19 parentheses 173:15 paring 54:20 part 10:11 20:2 29:10,11 36:16 51:1 61:11 74:3 75:12,13 75:23 88:16 97:24 110:16 120:13 128:24 131:24 133:23</p>	<p>137:13 142:6 143:16 160:8 160:22 176:18 176:20 183:22 185:22 187:3,9 198:9 participants 16:12 24:1 participate 63:8 93:15 participation 25:18 28:20 138:19,23 particular 46:7 53:7 54:7 55:16,22 62:18 85:5 88:19,20 90:15 93:4,17 97:6 100:7,14 102:5 107:12 110:18 145:3 151:3 154:5 163:5 particularly 35:3 40:3 particulars 116:6 parties 13:24 194:22 195:4 partner 159:2 parts 24:20 pass 102:9 passed 156:7 157:15 164:12</p>	<p>past 13:18 123:16 146:16 175:3 182:14 patterning 126:15 paying 106:16 106:16 peas 59:19 pending 7:19 194:6 people 22:3 37:24 57:24 60:8 93:10,20 93:22 100:24 101:13,13 106:3 122:24 123:22 124:4 126:9 134:23 137:10 139:14 139:22 140:18 141:5,6 143:11 146:16 151:7 174:3 177:5,14 178:24 people's 175:2 perceive 158:15 percent 18:9 22:4,5,9,12,13 45:10 52:6 61:17 71:2,21 72:8 73:7,13 73:20 76:3,16 79:2,11 80:11 86:4,16 97:5,5</p>	<p>97:12,20,20 98:15 104:7 105:1 133:19 133:19 142:12 143:24 144:24 147:18,19 148:9,10,12 150:12,13 151:7,10,21,22 181:1,6,14,18 181:23,24 182:8,21,24 183:8,11,24 184:4,10,12 185:1 186:9,10 186:15 187:12 189:8,9,15,18 percentage 49:12 53:3 55:3 57:23 86:15 100:23 106:7 109:11 142:10,11 187:18 percentages 148:3 perfectly 97:1 114:11 performance 27:11 period 41:9 55:24 98:17,22 109:6 132:14 188:22</p>
--	---	--	--

<p>person 45:12 67:12 108:16 137:1,1 179:3 personal 12:12 13:4 18:7,9 48:15 50:3 51:22 53:1 56:21 63:15 65:2,15 80:19 84:9 108:15 115:24 116:14 124:3,14 161:8 personally 65:19,21 165:18 194:4 197:11 198:15 personnel 158:21 perspective 166:2 persuade 93:14 pertaining 1:13 42:10 ph.d.s 20:20 phone 9:3 10:1 10:20 76:16,17 77:5 82:7 83:21 84:15,16 87:7 89:7 91:21 196:3 phrase 43:16 45:16,24 46:9 129:5 183:18 phrased 64:22 176:4</p>	<p>pick 163:10 picked 45:3 piece 75:17 83:6 84:22 pieces 30:13 83:5 113:21 piqued 115:20 pistol 33:11,22 58:24 59:4,6 pistols 33:16,17 33:21 34:1,3,7 35:23 36:2,10 43:22 44:4 74:11 112:7 131:9,11 place 12:9 133:14 139:14 139:17 placeholder 73:4 76:9 places 20:7 133:15 plaintiff 2:12 plaintiffs 1:5 194:8 platform 24:21 30:2 35:4,7 59:21 90:20,21 92:10,15,19 95:15 111:1,19 111:20,24 130:4,4,19,19 131:5,5 132:20 192:10,17</p>	<p>platforms 35:19 130:14 play 147:3 pleasant 77:20 please 7:6 8:2,5 33:8 52:18 64:7 85:9 102:7 111:10 112:16,20 116:21,22 129:23 149:17 154:8 187:23 196:11,11 plenty 192:14 plug 22:19,20 49:10 55:5 68:20 77:1,3 77:13 79:14 86:21 90:23 95:20 143:10 184:6 187:14 187:20,22 189:13 190:11 190:12 plugged 82:18 96:18 105:4 181:15,24 183:12,14 184:19,23 186:11 plugging 82:17 105:22 182:17 183:13 plus 41:2 49:2 59:8 71:7 74:4</p>	<p>133:18 142:10 142:11 point 60:8 61:6 100:22 136:10 139:24 150:3 151:3 160:21 173:24 178:10 191:16 points 57:14 142:10,11 150:8 police 6:11 57:2 policies 169:13 policy 159:22 160:11,23 161:7,11 164:21 165:14 165:17 166:1 168:14 169:4 politically 165:8 pop 104:12 popular 137:15 137:21 139:12 population 108:4 109:16 140:5,6 141:23 143:17 145:5 145:14 146:9 147:10,22 148:15,19 portion 103:21 184:3 posed 163:3</p>
--	---	--	--

<p>position 27:3 85:2</p> <p>positive 11:20</p> <p>positively 147:17</p> <p>possessed 113:15</p> <p>possession 59:1 113:8</p> <p>possible 32:7 32:23 40:5 44:13 111:24 138:3 140:14 177:23 181:10</p> <p>potential 107:16 136:9 151:17 164:6</p> <p>potentially 41:19 42:23 82:12 101:19 103:5 126:10 132:6 151:11 156:12 157:9 163:3 165:22 171:4 174:3,11</p> <p>practice 53:12 53:15 73:11 76:14 79:19 82:23 86:24 87:22 91:15 92:4,20 93:2 95:4 127:23 168:19 188:2</p> <p>practices 173:18</p>	<p>prefer 12:23 172:22</p> <p>preferences 178:5</p> <p>preferred 178:16 179:21</p> <p>preliminary 188:4</p> <p>preparation 10:18 28:6 62:20 100:11 101:17 115:16 115:17,22 127:17 129:1 145:23 152:11</p> <p>prepare 8:7 9:24 14:5 49:15 67:5 88:5 116:1</p> <p>prepared 14:8 42:21 117:6 168:20</p> <p>preparing 72:7</p> <p>presence 194:15</p> <p>present 3:1,5 65:12 195:1</p> <p>preserve 159:23 164:21 169:4 171:9</p> <p>president 27:17 27:17 45:1</p> <p>press 155:13</p> <p>pressure 127:10,11</p>	<p>193:4</p> <p>pretty 40:4 46:16 77:17 81:16 83:10 88:10,22 93:12 97:24 106:24 107:5 119:1 120:20 122:13 122:19 123:4,9 123:11 128:7 129:7 143:4 144:3,7 145:16 153:2 166:23 191:6</p> <p>prevalence 152:13</p> <p>prevalent 24:10 36:4 123:9 131:12</p> <p>prevented 82:24 83:16</p> <p>previous 63:18 64:21 125:10 130:23 132:22 184:18 191:5</p> <p>previously 8:15 10:16</p> <p>price 101:14</p> <p>primarily 20:8 30:16 37:2 45:21 67:4 107:21 108:23 119:2 121:12 128:17 130:14 132:19</p>	<p>primary 23:21 24:19,19 35:21 119:23 161:3 167:9 175:12 177:13,15 178:22</p> <p>principles 21:1</p> <p>print 103:15 146:23</p> <p>printer 102:12</p> <p>printing 117:19</p> <p>printout 66:8 66:10 71:18</p> <p>prior 10:11 14:20 63:24 64:1,2,4,12 65:4 119:19 124:23 129:8 155:8 159:9 188:9</p> <p>prioritize 26:12</p> <p>privileged 9:22</p> <p>probability 182:22 184:9</p> <p>probably 12:11 66:21 74:1 80:4 84:19 89:6 106:18 110:17 111:22 111:23 112:3 128:20 129:17 137:21,22 153:23 156:2 156:19 160:13 161:7 165:9</p>
---	--	---	--

<p>167:24 191:17 192:3 problem 28:10 51:14 90:9 procedure 1:12 9:3 107:6 197:5 198:5 process 23:4 39:24 51:2 54:20 73:16,20 81:17 86:4 88:17 103:11 127:7 139:5 167:17 181:9 185:11 186:21 186:22,23 187:3,9 produce 50:1 54:12,13,24 56:17 74:17,18 74:19,20 81:24 99:10 101:5 produced 42:5 47:17 49:2,20 50:12,18 55:11 55:24 60:12 62:12 66:9 69:11 74:24 75:19 76:5 95:3,7 96:16 99:6 114:18 116:11 117:13 118:4 122:16 189:9,18</p>	<p>producing 138:6 141:16 product 32:1 52:5 72:21,23 74:22 75:4 76:21 79:12 81:20,24 82:15 84:24 86:9 92:2 97:22 100:5,6 103:18 103:20 110:7 120:7 122:13 123:7,11 127:8 127:14 138:8 151:15 153:2 179:7 182:17 185:16 187:11 187:18 production 33:15 36:19 39:10 41:2 48:8 49:6,15 55:17 59:23 64:5 68:14 77:8 88:5 90:4 90:14 91:2,17 92:9 94:23 96:4,10 97:5 99:4 112:18 118:7 130:11 130:13 188:5 196:15,17,22 products 34:13 73:18,24 86:20 132:6,18 190:4</p>	<p>190:14 professional 18:4,8 20:17 programmer 167:22 programs 19:17 23:23 project 17:17 17:19,24 18:2 18:12 88:20,21 109:20 118:22 projects 12:16 15:1,10 21:12 118:19 promote 11:20 106:12 promoted 107:20 138:18 138:23 159:2 promoting 107:24 pronunciation 87:18 proportion 57:9 58:7 60:12 83:1 95:7 108:3 109:4 150:16 187:5 188:3 proposition 105:14 protect 14:13 179:2 protecting 179:10,12,13</p>	<p>protection 177:24 proud 123:11 provide 14:1 31:5 44:12 46:19 60:7 101:4,9 114:17 121:8 138:2 159:20 161:4 provided 23:15 93:20 124:19 178:4 provides 142:19 providing 30:10 77:6 123:19 135:1 public 159:22 160:11,23 161:11 164:21 165:14,17 166:1 168:14 169:3 197:10 197:18 198:15 198:23 199:23 published 39:13 121:16 pull 35:3,8 49:11 70:4 79:15 111:2 192:11 pulled 79:21 purchasing 152:8</p>
--	---	---	--

<p>purpose 11:17 12:3 23:11 100:19 127:5 137:13 138:1 160:2,4,6,8 161:1,4 purposes 9:16 23:19,22 36:9 36:13,15 45:14 47:16 56:19 57:6 58:3,4 110:20 111:17 112:6 125:19 125:19,20 129:4 137:14 144:8 149:4,15 163:4 177:10 pursuant 1:11 194:24 put 31:8,24 33:14 47:5 50:14 51:24 52:6 72:22 75:2 83:8 85:6 101:8,23 110:7 115:1,18 122:13 123:6 125:6,14 127:13 138:13 138:15 142:3 143:5 152:15 152:17 156:2 158:20 171:10 183:17 185:10 185:12,13</p>	<p>putting 32:4 41:15 61:11 75:4 138:12 147:15 165:10 165:19 185:16 puzzle 83:4,5 88:15</p> <hr/> <p style="text-align: center;">q</p> <hr/> <p>quality 17:2 109:24 110:2 120:12 124:1 quantity 145:12 quarterly 17:16 query 49:9 question 7:5,7 7:12,19 22:12 29:5 32:3 47:4 51:5 53:15 60:10 62:8,10 62:16 83:22 97:23 98:4 106:23 121:9 121:10,11 134:5 137:8 149:8,17 150:12 160:19 162:16,17,21 162:21,22,23 169:16 170:10 172:20 173:2 174:19 175:5 176:9,14 178:1 178:4,8,15,15</p>	<p>188:15 189:16 191:9,17 questioned 97:19 153:12 questioning 65:6 questionnaire 20:13 162:11 162:15 163:14 questions 25:2 25:4,5,10 30:9 30:16 31:23 32:1,22 40:20 42:10 46:6 48:19 57:19,20 94:22 111:6,7 112:14 125:16 126:14,23 127:15,22 128:4 135:16 148:21 150:18 153:11 162:20 163:2 172:15 172:17 174:15 175:10,15,18 175:19 176:1,5 176:12 179:17 180:2,3,7,9,13 182:3 190:16 190:20 193:9 quick 38:20 162:6 164:2,3 quirks 144:4 quite 23:8 114:13</p>	<p>quote 192:5</p> <hr/> <p style="text-align: center;">r</p> <hr/> <p>r 8:6,6 34:3 71:3 r15 50:5 129:14 r3 16:10 23:24 28:21 raelene 1:14,23 194:1 range 38:12 114:19 118:6 120:17 129:13 154:14 161:23 ranges 17:20 142:10 ranging 137:16 raoul 1:7 6:10 194:9 196:6 197:3 198:3 rarely 87:10 99:12 rate 11:7,8 140:20 rates 150:17 151:24 rather 18:20 82:20 105:18 135:1,8 176:1 185:20 rationale 27:7 reach 13:1 22:2 105:16 123:24 133:15 139:18 reached 119:8</p>
---	--	--	---

reactivate 16:10,12 24:1	141:11 160:19 172:16	145:18 146:3 152:15 153:1,1	128:23 131:13 133:11 134:17
read 28:5 65:5 71:5,10 102:19 103:21 115:19 116:5 127:2 130:6 131:3 133:7 134:10 142:13 148:16 149:24 158:11 172:5,13,24 173:5 176:18 178:19 183:5 183:21 188:8 193:12 197:5,6 197:12 198:5,6 198:17	reason 40:7 61:9 175:9,13 175:17 176:7 177:15 179:16 196:14 198:8 199:3	153:4,15 155:7 156:5,20 165:10 167:8 168:24 174:14 174:16 176:5 176:12,24 184:6 188:21	141:24 144:12 148:21 150:1 153:21 157:17 157:18 165:4 165:18 167:16 167:20 169:7 175:9,22 177:9 177:21 181:11 182:11 185:8 192:7
reader 151:5	reasonable 114:17 152:3	receipt 196:18	recommend 112:2
readers 150:9	reasoning 120:14	receive 19:12 22:4	recommenda... 123:4
reading 37:6 44:14 150:1 152:5 169:9 178:1 196:19	reasons 27:10 80:22 108:15 157:3 175:4 177:13	received 8:9,12 20:4 77:16 118:23	record 8:3 9:11 38:9,12 66:8 70:13 94:8,12 115:13 118:6 130:24 144:20 161:23 166:16 183:2 198:9
reads 71:2 75:23	recall 9:5 14:7 17:7 19:4 23:4 24:17 26:9 27:19 29:21 30:13 31:13,13 32:10 34:11 47:8 58:9,16 64:21 68:17 70:11 72:4 91:20 92:6 96:13 99:13 101:16 103:13 104:5 107:14 111:6 113:2 119:24 122:18 123:5 124:13 127:18 128:20 129:2,3 139:13 140:11 144:14	receivers 75:7	recorded 77:8 78:3 80:8 186:20
ready 174:2		recent 183:8,19 184:3	records 77:14 186:14
real 162:5 164:1		recently 18:24	recreational 17:22
realize 31:24 108:9 188:20		recess 38:7 94:9 144:18	recreationally 177:12
really 49:9 59:2 93:18 99:13 108:13,20 112:9 116:16 139:17,19		recognition 106:15	recruit 16:9 23:24
		recognize 41:24 64:11	
		recollection 57:12 68:7 70:16 72:14 73:5,11 76:4 86:4 91:6 95:9 97:3,8 99:7 104:24 109:9 112:8 119:15 121:4 122:10 123:20 128:14	

<p>recruitment 11:19</p> <p>redirected 162:16,18</p> <p>reds 81:11</p> <p>reduced 194:16</p> <p>reduction 150:13,14</p> <p>refer 15:7 46:10</p> <p>reference 110:15 196:7 197:2 198:2</p> <p>referenced 183:16 197:11 198:15</p> <p>references 123:15 124:3 125:2,3</p> <p>referring 98:20 148:9 192:17 192:21</p> <p>refers 71:20,23 72:1</p> <p>reflect 55:9 56:23 113:14</p> <p>reflected 96:10</p> <p>reflecting 149:21 186:14</p> <p>reflects 67:20 69:8,10 81:14 116:24 150:15</p> <p>regarding 17:20 65:7 169:2 171:8</p>	<p>regionalized 141:7</p> <p>regular 17:9,10</p> <p>regularly 39:13</p> <p>regulating 14:13</p> <p>regulations 29:24 56:10</p> <p>relate 37:8 179:6</p> <p>related 15:19 15:20 27:10 49:9 195:4</p> <p>relations 29:9 29:12 174:5</p> <p>relationship 18:4,6,8</p> <p>relationships 13:3 15:22</p> <p>relatively 93:6 185:5</p> <p>release 115:19 155:13 193:4</p> <p>relevant 25:1 29:16 109:6</p> <p>reliability 30:5 30:24 116:15 122:16 123:18 124:16,18 169:14</p> <p>reliable 48:3 60:5 104:21 115:2 120:3 121:23 139:19 158:4 166:3</p>	<p>187:1</p> <p>relied 49:14</p> <p>rely 46:23</p> <p>relying 145:24</p> <p>remaining 51:16</p> <p>remember 30:4 32:11 34:11 36:3 40:18 97:18 116:6 120:16 126:21 141:12 143:2 155:13</p> <p>remembered 76:10</p> <p>reminded 128:18</p> <p>remington 50:4 51:12 90:18 91:24 92:11</p> <p>repeat 90:8</p> <p>repeating 165:15</p> <p>replace 114:12</p> <p>replaced 27:21</p> <p>report 14:8 15:22,24 32:10 32:11 33:14 39:2,3,8,10,12 40:9,11,21 41:15,21 42:10 42:20 43:6 44:19 45:14 48:6,7 53:19 56:4 58:15,20</p>	<p>61:11,13,17,18 62:9,18,24 63:9,13,16,18 63:23 64:6 65:3,17,23 67:18 70:21 72:3,17 75:19 77:13 81:4 83:11,12 88:9 95:23 99:23,24 100:11,19 101:6,8,18 102:5,19,23 104:18 105:8 106:21 108:20 109:15 110:16 110:20 111:11 111:17 112:18 113:16 115:11 115:22 116:1,9 116:15,18 118:4,8,9 119:11,12,16 119:19 120:11 120:23 121:2,7 121:12,16,23 122:2,3 127:11 127:17 128:11 129:1,4,6,22 130:12,13 131:22 134:12 135:8,22 143:5 143:8 144:8 145:20,23 147:15 150:7</p>
--	---	---	--

150:10 151:4,5 151:7 152:12 152:17,21 153:7,8,16 154:17 155:6 155:10,19 156:10,17 158:6,8,17 159:17 160:5 160:20 161:2 165:3 167:18 182:12 186:23 reportable 84:5 reported 1:23 26:17 68:23 83:18 84:2 87:3 88:1 134:13 137:4 147:8 148:9,10 148:12 194:14 reporter 1:15 6:24 8:11 38:5 105:12 194:2 195:13 197:7 reporting 64:18,24 65:7 reports 14:5 24:4 30:19 39:15 41:11,22 48:5 63:21 67:22 96:4 101:6 119:13 125:1 131:23 146:23 157:14	represent 67:17 70:7 representation 110:5 114:24 156:23 representative 109:16 140:6 141:22 157:6 represented 151:1 181:18 representing 9:15,22 reputation 93:18 request 50:17 90:13 91:16 95:1 198:9,11 requested 92:3 requests 38:5 require 21:18 required 48:6,7 196:24 requirement 22:2,23 requirements 20:2 rerunning 125:7 research 12:5 12:16 14:24 15:3,4,10,15,20 15:20 16:5,21 16:24 17:5 18:12,16,18 19:7 20:9,19	20:24 21:4,7 21:10,16 23:1 23:11,16,20 24:4,18 25:1,6 25:11 28:1 29:11,12 30:6 30:9,14 31:1,3 31:11,16 40:2 62:14,16 81:5 114:21 118:17 167:15 178:21 191:12,15 researching 15:23 resembles 62:2 reserve 190:18 193:11 resistance 93:18 resource 106:24 resources 101:4 113:24 138:8 respect 152:12 153:8 158:7 respective 194:22 respond 78:7 78:16 108:17 129:15 174:23 responded 76:13 78:14 178:24	respondent 136:9 162:14 164:6,7 169:15 respondents 104:20 105:15 107:16,18 108:1 109:14 112:5 127:16 134:13 141:21 148:10 163:3 163:22 165:2 169:12 responding 78:2 151:8 response 68:19 71:9 75:24 76:14 85:1 101:11 103:1 107:3 108:12 108:22 120:17 121:9,10 124:1 126:4 127:2 133:24 134:3 148:4 149:11 150:17 151:24 183:4 184:19 184:20 185:23 186:2,4 187:2 responses 101:8 103:22 105:6 106:13 106:22 107:7 107:10 108:11 109:23 110:3 120:19 126:1,5
--	--	---	--

127:3 128:9,12 134:9,13 135:7 136:1,5,12 137:9 139:19 141:13 146:24 147:1,5,8,13,14 158:1 159:12 159:17 169:19 178:14,22 181:9 191:6 responsibilities 11:13 15:17 16:6,9 28:2,13 36:8 responsibility 45:13,20,22 responsible 16:20 21:9 26:14 39:21 41:14 61:10 121:22 128:11 128:18 156:15 156:18 responsive 119:3 restate 188:13 result 68:24 102:20 107:17 resulted 117:12 results 17:5 40:6 110:12 135:5 136:13 137:3 151:21 154:6 165:14 165:16 169:12	169:14 170:18 171:14,16 retail 59:21 103:1 retailer 10:14 30:21 99:23 100:10 101:6 102:21 107:1 retailers 100:24 101:7 102:24 103:23 104:3,8,11,17 105:3,18 106:11,18 108:3,10 109:1 109:7,12,17 110:8 145:13 retain 16:10 24:1 retained 13:24 return 180:20 returned 87:7 93:22 196:18 returning 85:8 revenue 27:1 101:15 review 8:17 10:13,17 38:22 52:12 62:19 67:6 102:16 115:17 150:9 162:5 168:20 174:3 178:2 196:12 197:1 198:1	reviewed 8:22 9:1 29:15 115:15 reviewing 10:5 28:11 76:4 100:9,10 118:3 169:21,24 172:6 revolver 33:19 33:23 48:10 74:19 revolvers 74:11 74:11 rid 126:1,9 ridiculous 125:20 rifle 10:15 25:20 30:17 34:23,24 35:1 35:6,14,14,15 35:16,17,22 36:11 37:15 38:2 41:2 43:16,22 48:11 48:16,17 50:5 50:6 52:7 57:18 58:11,24 68:14,16,23 69:14 74:19 76:22 79:13 86:13,13 90:14 90:19,21 92:5 92:10,21,24 93:6,12 94:23 95:13 109:5	110:20,22,24 111:8 118:9 123:8 125:18 125:21,23 129:5,13,17 130:4,16,20 131:6 132:8,15 133:15 134:6 136:4,6 137:11 137:19 140:7 144:10 152:8 154:16 155:21 161:23 169:17 177:5 178:13 179:4,10,12 190:6,10,15 191:8,11,14 192:8,9 193:7 rifles 24:22 25:23 30:2 34:1,4,7 35:7 35:18 36:17 37:3,4,10,11 42:5,6 44:3 47:11 49:3,11 49:16,18,21 50:1,2,12,18 51:9,9,18,19,23 52:12,13,22 53:8,10,11,12 55:1,4,11,15 56:3 57:20 59:7 60:21 67:2 68:21 69:12,13 71:7
---	--	--	--

73:21 74:4,7 74:11,24 76:5 76:23 82:13,19 83:2 86:10,17 86:21 87:9 90:5,17,19,24 92:8,19 93:8 95:17,19 96:6 97:14 111:14 111:17 112:1,4 130:15 131:22 132:20 135:15 136:2,21 137:15 138:9 139:15 140:23 148:23 149:9 160:4 177:9 178:6 179:19 187:7,13 188:4 189:9,10,16,18 189:19 190:23 191:19 192:4,4 192:6,14,18,21 right 7:11 14:19 31:8 32:3 35:11 41:11,15 51:2 54:22 55:8 57:6,14 59:19 61:4 64:7 65:13 68:24 69:6 70:24 71:5,10 74:8 76:4 78:8 79:5 79:10 80:9,11	81:6 84:10 85:13 87:16 88:10,22 89:19 89:21 90:15 94:11 96:18 97:21 98:14 100:12 102:2 103:23 104:1 106:24 108:11 108:14 117:6 122:2 123:21 124:8 125:9 134:14,24 135:10 136:13 138:15 139:6 143:18 144:1 146:15 149:23 155:22 157:1 157:15 158:19 165:22 168:9 168:17 171:2 171:12 173:8 180:4,12,23 181:19 183:4 187:7 191:16 rights 159:23 160:24 164:22 168:15 169:5 171:9 rings 173:13 river 49:19 51:21 84:10 rock 49:19 51:21 84:10	role 11:13,24 15:14,18 16:13 27:22 29:19 31:18 39:21 121:22 167:11 roles 16:2 room 32:9 38:11 round 35:2,9 192:11 rounded 32:15 46:13 80:6 140:14 rounds 59:5,6 193:3 routinely 88:17 88:23 row 68:9 69:4 69:11 78:1 rows 70:19 98:24 ruger 60:24 61:2 rules 1:11 6:17 56:10 197:5 198:5 run 11:15 107:19 runs 6:18	safe 71:9 75:24 77:24 183:4 safeguard 135:4 safeguards 134:8,16 safes 125:14 126:20 134:23 safety 39:18,19 salam 8:22 10:7 27:24 29:2 41:19 65:5 116:5 salam's 29:5 37:6 sale 53:8 187:6 sales 59:16,16 59:21 109:11 178:21 sample 21:22 22:2,17,20 104:21 105:1 105:24 108:18 110:6 140:14 141:4 142:9 143:17,18 145:4,6 146:6 146:14 147:7 151:1 sanetti 45:2 46:3,11 60:1 61:15 sats 126:18 saw 32:9 84:19 138:6 150:6
		s 5:1 11:21 26:24 71:8 74:13,14 196:15 198:8,8 199:3	

<p>181:12 186:3 saying 44:4 77:7 105:6 108:9 118:24 140:13 141:12 149:19 159:7 says 9:8 42:17 44:8 45:5 55:8 63:3 69:5 70:5 70:24 71:7 74:3 85:22 86:13 102:2 118:13 130:2 130:24 133:24 138:21 142:7 151:7 154:3 159:11,12 160:22 164:19 167:23 168:13 169:19 170:16 170:23 171:1 171:22 172:10 173:2,8,14 176:18 179:9 179:11 185:3 185:22 schedule 41:21 school 126:18 schwartz 119:24 140:12 science 19:10 scope 93:2 117:5 135:23 166:9</p>	<p>scratch 77:3 seal 197:15 198:21 search 84:15 second 24:22 44:20 85:9 94:1 120:14,19 158:22,23 164:19,19 168:5,12,16 170:12,13,15 170:17,17 171:6 172:5 182:18 185:2 188:15 seconds 144:16 section 70:17 70:21 73:3 102:16 see 10:10 17:15 40:16 41:4 42:16 44:3,7 46:13,16 47:20 48:21 64:19 65:22 70:4,18 74:5 80:17,23 81:7,10,16,21 83:3 85:24 88:7 89:20 93:1 95:22 96:19 98:6 99:22 102:14 105:8 106:23 110:15 111:13 114:14 116:19</p>	<p>118:14 121:13 123:12 133:1 134:1 139:3 141:10 142:4 142:23 152:18 154:21 156:7 156:11 159:14 159:24 163:23 164:15,23 165:7 167:7,15 168:6 169:15 169:18 170:2 171:23 172:10 172:16 173:7 173:14 176:20 181:4 186:22 187:17 seeing 155:13 seeking 99:2 seem 117:19 seemed 24:9 34:20 148:14 seemingly 62:12 seems 167:21 171:7 173:15 174:11 183:22 seen 38:18,21 62:5,8,17 66:15,18 67:11 118:2,5 146:22 148:1 155:5 162:2 166:19 segmentation 25:19</p>	<p>select 134:8,23 selected 118:21 self 88:22 134:23 136:12 136:15,22 172:11,14 176:19,22 177:3,6,19,24 179:21 sell 101:1 semi 33:18 35:1 35:6,11,13,15 74:18 110:24 111:1 130:4,7 131:1,5,22 191:18 192:4,9 192:14 193:2 semiautomatic 90:20 send 22:1 106:3 145:12,13 senior 167:15 sense 7:15 33:4 41:13 47:21 98:1,16 99:8 127:4 153:14 166:1 167:21 177:3,14 179:15 181:21 185:14 sent 8:16 10:12 103:16 105:3 143:11 152:22 166:21,23</p>
--	--	---	--

<p>sentence 130:2 130:9 139:6 142:17 149:19 158:23 164:19 168:16 169:2 169:20 170:17 171:8,11 177:1 185:2 separate 49:15 77:14 series 57:19 serves 158:19 services 23:15 29:10,10 119:1 set 66:1 99:15 104:20 117:16 141:5 154:7 161:15 166:11 195:7 settle 54:6 seven 6:15 31:14 73:18,18 seventh 69:21 71:17 82:1 180:21 several 15:22 20:20 21:11 24:8 30:18 39:3,14,15 45:10 57:13 72:16 91:19 100:6 127:19 142:1 143:19 148:2 166:22 168:1 182:14</p>	<p>share 47:16,19 47:21 103:24 shared 163:22 sheet 67:20 178:2 196:13 198:7,10,18 199:1 shelby 3:3 shelves 157:2 sheriff's 57:2 shift 132:6 154:1 160:13 161:13 169:19 shifted 132:15 132:17 151:11 shifting 121:14 shoot 61:3 shooters 11:20 11:22 shooting 10:23 14:19,21 15:21 17:20,23 24:2 26:23 42:18 101:3 102:22 161:22 177:12 shops 104:13 short 38:7 144:18 shorted 102:8 shorten 175:1 shorthand 1:14 194:1 195:13 shot 26:22 27:2 shotgun 44:4 48:11 74:20</p>	<p>178:24 179:3 shotguns 34:5 36:16,22 43:23 74:12 131:17 131:19 show 26:22,23 27:2 38:10 42:2 58:22 61:19 115:4 117:18 showed 113:2 174:18 shown 30:23 183:13 196:16 shows 42:3 shut 191:4 shy 123:1 144:21 side 28:1 66:2 78:20 82:16 83:7 85:6 99:16 117:16 154:8 166:12 173:8 185:18 185:21 187:21 sift 149:12 sigale 3:7 9:8 signature 190:18 193:12 194:20 195:12 196:14 signed 197:13 198:18 significantly 89:13 159:16</p>	<p>signing 196:19 similar 39:3 57:2 59:23 60:10 64:11,14 66:20 68:20 100:5,8 109:1 117:19 119:19 120:24 121:5 121:11 163:6 165:2 166:4 178:15 simple 21:11,14 58:12 sincerely 196:21 single 84:22 175:14 sir 172:2 190:23 196:10 sit 73:6 81:12 81:15 114:16 116:13 128:22 169:8,11 175:8 175:12 sitting 57:11 73:15 114:20 177:2 184:8,22 situation 74:23 121:19,21 situations 99:2 six 31:14 39:20 size 21:22 22:2 60:9 104:21 143:16,17 145:5 146:7,14</p>
--	---	---	---

<p>147:7,21 skew 169:23 skewed 141:4 slash 71:3 111:14 181:2 slightly 148:13 157:16 170:7 176:4 slip 42:23 44:5 slipped 44:1 small 36:19 44:5,6 53:10 147:18 177:11 smaller 146:14 smbtrials.com 2:10,11 smith 3:3 smoothly 6:18 snapshot 149:9 157:6 sold 59:19 101:12 109:5,6 114:5 solicit 107:9 soliciting 107:7 solid 49:9 143:1,4 145:16 184:20 solutions 196:1 199:1 somebody 12:4 12:5,8 27:24 42:11 46:4 48:21 53:22,24 56:7 58:10</p>	<p>87:7 89:8 95:14 97:23 99:9 115:2 122:23 123:2 124:6 125:22 164:13 174:5 174:12,17 186:9 somebody's 47:4 somewhat 52:15 123:21 132:17 140:11 170:12 sorry 27:18,20 28:9 72:15 80:1 90:8 121:19 136:16 149:24 160:16 162:6 191:9 sort 88:11 126:6 144:2 sounds 26:10 27:6 28:23 149:20 source 44:8,16 44:20 45:5 57:17 64:17 73:6 139:20 sources 43:12 44:13 45:6,13 45:19 48:3 64:17 83:13 114:22 119:3</p>	<p>south 2:18 southern 1:2 194:7 southwick 109:21 110:1 119:4 space 111:21 spans 175:2 speak 17:11 speaking 21:24 23:10 speaks 29:5 special 58:15 specific 25:3 32:10 40:19 59:16 60:21 61:9 63:16 68:19,20 69:3 73:8 74:22 75:9 87:3 96:10 97:10 99:3 109:7 149:5 158:7 162:2 165:10 175:23 192:12 specifically 18:24 35:4,7 49:16 62:19 71:24 72:4 81:1 95:16 101:16 112:13 132:12 135:14 143:7 148:6 152:12 175:22 176:6,11,24</p>	<p>specifics 51:6 98:2 specified 130:3 131:4 speculation 78:12 79:7,8 114:9 speeders 126:9 126:14 128:1 128:19,24 spell 8:5 spelled 74:13 spend 138:8 spending 138:11 spent 46:22 61:8 77:18 spit 22:22 105:5 spm 1:6 spoke 9:21,24 sponsored 102:21 sporting 10:15 24:21 25:20,23 30:17 34:23,24 35:14,14,16,17 35:22 36:11,17 37:9,15 38:2 39:18 41:2 42:5,6 43:16 43:22 44:2 47:11 48:16,17 49:3,16,21 50:2,6,18 51:9</p>
---	---	--	--

51:18,23 52:7	154:16 155:21	spreadsheet	65:20 74:15
52:13,22 53:10	160:4 161:22	55:5 66:11,14	124:6 158:18
53:11 55:1,3	169:17 177:5,9	66:16,16 67:9	158:22
55:11,14 56:2	178:6,12 179:4	70:14 72:8	staple 70:1
57:18,20 58:11	179:10,12,19	77:9,15 78:1,3	start 40:19
60:21 67:2	187:7,13	81:3 85:8	45:3
68:16,21 69:12	189:10,15,19	87:15 88:1	started 14:19
69:13 73:21	190:6,10,15,23	89:15 96:9	24:6,7 33:13
76:23 79:12	191:8,11,13,19	98:4 180:19	34:8 35:24
82:19 83:2	192:6,8,18,21	189:21	36:23 37:16
86:9,17,21	193:7	spreadsheets	79:2 91:7
87:9 90:4,14	sports 10:23	77:23	111:21 119:2
90:23 92:5,8	14:19,21 15:21	squirrels 61:3	starting 60:8
92:10,21,24	39:18 42:17	staff 178:12	174:6
93:6,12 94:23	101:3 102:22	stage 103:10	starts 168:4
95:13,16,19	118:13,16	stamm 1:14,23	state 1:15 2:14
96:6 97:14	119:7,12,21	194:1	6:11 8:2 14:14
109:5 110:19	120:1,2,22	stamp 40:22	17:21 28:20
110:22 111:8	121:17 122:9	64:9 66:10	39:17 56:9
111:14,17,24	122:17,22	75:15,16,17	86:12 141:7
112:4 118:9	123:3,16	102:7 116:22	194:2 197:10
122:10 123:8	124:19 125:8	157:9 166:16	198:15
125:18,21,22	128:5,12 133:6	stamped 42:14	stated 13:18
125:23,24	133:10,21	75:11 76:19	45:11 90:7
127:5 129:5,13	134:18 140:13	stand 24:20	95:10 152:16
129:17 130:15	141:19 144:9	65:21 124:11	160:2
132:15,19	145:18,22	169:7	statement
133:15 134:6	151:1 152:22	standard 31:9	165:1,1 197:13
135:15 136:2,4	152:24 153:5	32:5 92:19	197:14 198:19
136:6,20	153:17 155:23	107:6 127:23	198:19
137:10,15,19	156:9,13	130:22 144:7	statements
138:9 139:15	157:11 161:22	standards	163:21
140:7,23	167:6,12	22:24	states 1:1,12
144:10 148:23	168:21 169:1	stands 11:22	44:21 55:15
149:9 152:8	172:7	32:20 44:16	67:3 103:2

<p>104:3 110:4 112:18 130:12 141:23 144:11 146:2,17 159:19 194:6 statistic 21:1 statistical 20:19 21:9,14 21:18 110:10 124:21 141:20 152:10 statistically 21:12 104:21 statisticians 20:21 statistics 19:20 19:22 20:5 23:5 39:19 125:5 143:15 status 148:13 stenographic... 194:15 step 94:1 100:17 142:18 steps 47:24 104:19 109:13 122:15 123:17 127:13 169:22 steve 45:1 46:2 46:11 60:1 61:15 stewards 11:12 11:24 14:16 155:15</p>	<p>stood 150:4 151:4 stop 26:21 stopped 122:2 store 104:15 stores 59:18 stories 18:10 story 119:24 140:12 straightlining 126:16,16 strategy 128:23 street 1:16 2:18 strictly 18:7 27:12 56:18 58:3 107:13 188:18 strike 18:1 36:14 69:9 89:11 99:1 124:17 170:9 189:16 strikes 84:17 strive 142:23 strived 22:7 strong 145:19 152:1 stronger 108:21 135:5 struck 29:15 stuck 122:6 studied 104:6 study 10:15 22:3 26:15 30:17 57:18</p>	<p>110:18 114:2 125:4 126:5 137:22 138:23 147:4 155:13 155:16 161:23 170:18 171:14 171:16 stuff 22:6 88:11 127:10 128:8 129:3 143:4 style 111:14,18 112:7 subject 189:6 submitted 30:15 subscribed 197:10 198:14 199:21 subscribers 139:13 substantially 120:24 191:6 sudden 138:14 sufficient 104:21 sufficiently 147:8 suggested 26:18 134:19 179:19 suit 195:5 suite 1:16 2:7 196:2 sum 79:20</p>	<p>summarize 43:21 summary 31:17 84:7 150:4,8 suny 19:14 superior 196:1 supervise 16:14 supervisors 26:16 supply 143:14 support 11:19 12:5 109:20 supporting 30:2 31:4 186:14 suppose 102:12 supposed 76:10 sure 6:17,19 22:11 23:7,13 24:19 25:11 29:7 31:8 32:6 32:22 33:5 41:20 44:12 45:17 46:1,12 48:2,2 51:12 52:4 53:3 54:8 57:23 61:16 62:11 64:4 70:9 71:3,14 72:2,10,23 75:2 76:24 81:19,23 82:20 86:3 91:6 98:15 100:20 105:10 106:14</p>
--	--	---	--

108:6 110:7 121:22 122:5,8 122:18 124:21 125:8 127:13 129:19 132:5 136:17,24 138:20 139:10 140:3 144:17 146:4 155:4 157:19,22 165:6 167:9 169:9 170:20 170:22 173:12 174:7 176:13 178:9 180:1,19 181:2,12 184:1 184:18 185:16 188:19,23 192:2 surprise 28:3 survey 10:14 20:13 22:1 26:3 30:21 99:23 100:10 101:7,10 102:23 103:1 103:22 104:4 105:15 106:3 106:17,19 107:10,16,20 108:1,1,17 109:14,22 110:12 112:5,6 120:8,20 124:10 126:2,7	126:10,22 127:16 128:10 129:8,8,10,11 130:3 131:4 134:4 135:1,13 135:14,23 136:1,9 137:3 137:13 138:19 139:18,21 141:21 143:22 148:10,14,18 150:14,17 151:21,24 154:6,24 155:5 155:19 157:12 158:16,17,24 159:2 161:2 162:11,15,19 162:20 163:3 163:13,17,22 163:24 164:11 164:16 165:2,3 165:11,13,16 166:5,9 167:18 167:23 169:12 169:14 170:24 171:1 174:21 174:23 175:10 175:11 176:6,7 176:15 177:8 178:8,14 179:18 survey's 134:5 surveys 21:13 106:11,12	107:3 110:14 111:22 118:13 118:16 119:7 119:13,21 120:2,3,23 121:18 122:9 122:17,22 123:3,16 124:19 125:8 125:14 128:5,9 128:13,17 133:6,11,21 134:19 140:13 141:14,20 142:2 143:23 144:9 145:18 145:22 151:2 152:22,24 153:6,18,19 155:24 156:10 156:13 157:12 159:11 162:13 163:4 165:20 166:3 167:7,12 168:21 169:1 172:8 173:22 175:13 swanson 2:3 swath 135:9 switch 16:3 171:18 sworn 6:2,5,20 194:11 197:10 197:13 198:14 198:18 199:21	synonymously 111:18 system 49:9 t t 3:9 5:1 8:6 11:21 26:24 110:11 tail 112:11 take 7:17,18 19:20 20:15 38:6,20,22 57:16 93:24 94:7 97:13 100:17 109:13 122:4 126:5,19 128:19 133:8 136:17,21 139:18 144:15 150:9 162:14 164:1,16 169:21 174:4 178:2 187:14 193:12 taken 1:13 9:2 38:8 94:9 103:4 104:19 128:10 143:18 144:19 145:6 takes 142:18 162:14 talk 10:13 18:11 60:1 94:16 124:4,6 138:18
--	---	--	--

<p>talked 63:6 72:10 83:20 104:23 110:23 113:18 142:1 142:21 146:13 147:23 150:24 182:1,10 183:6 187:21</p> <p>talking 7:2 9:13 77:10 92:8,12 92:14 123:21 130:22 132:3 144:23 185:7 192:9 193:8</p> <p>talks 181:1</p> <p>tap 148:14</p> <p>tapped 148:19</p> <p>target 17:23 24:1 177:11</p> <p>tax 17:21</p> <p>team 16:18,19 16:20,23 17:17 27:14,15 40:3 40:5 88:10 122:3 174:5</p> <p>techniques 152:11</p> <p>tell 9:23 27:9 33:8 52:20 56:1 71:23,24 76:18,21 80:24 94:4 97:16 126:24 137:24 140:2 151:10 167:14 187:18</p>	<p>190:9</p> <p>telling 168:24 169:12</p> <p>ten 48:24 66:22 73:18 88:12 98:22 106:3,4 120:4 128:15 131:11 132:5 134:18 140:2 140:11 143:2 148:20 152:14 156:6 157:15 159:6,9 161:3 165:5 174:24 189:1</p> <p>tenure 62:12 112:10 132:20 156:8</p> <p>term 21:21 22:9 34:22 35:17,22 37:14 37:19,22 38:1 43:18,21 65:9 92:5,5 93:6,12 102:16 110:19 111:4,18 129:16 132:15 142:15,16</p> <p>terminology 32:21 110:23</p> <p>terms 13:15 33:7 34:6 45:18 59:11 93:1 128:9 140:7</p>	<p>test 126:19</p> <p>tested 157:22</p> <p>testified 6:5 67:20 68:12 90:2,7 188:6</p> <p>testify 13:19 28:8 166:8 194:11</p> <p>testifying 6:22</p> <p>testimony 7:24 11:5 14:1,2 29:5 31:18 43:19 50:21 78:10 79:7 83:20 107:22 184:11 188:1,7 188:12 189:5 189:14,17 190:3,3 194:13 194:18 195:7 197:6,7 198:6 198:9,12</p> <p>text 163:19,21 164:5,10</p> <p>thank 51:15 87:20 94:15 98:14 162:9 180:12 193:9</p> <p>thankfully 93:22</p> <p>theirs 122:21</p> <p>thereof 195:6</p> <p>thing 31:4 49:7 53:23 71:13 76:11 89:9</p>	<p>122:18 126:19 126:21 156:7 158:18,22 163:10 164:15 164:17 182:18 182:19</p> <p>things 13:16 25:20 37:24 81:10 84:9 91:12 99:10 101:1 126:15 135:19 140:10 150:8 155:8 174:20 177:1,7 190:20</p> <p>think 37:23 40:14 46:12 48:23 58:5 60:15 69:22 72:12 73:20 74:14 76:24 77:10 79:9,11 83:9,9,10,19 84:23 85:16 96:20 97:9 98:11,12 99:17 101:12 103:9 105:23 108:8 109:20 111:21 113:18,23 114:13 120:17 122:12 126:24 131:12 132:2 134:16 135:4 135:21 141:2,8</p>
---	--	--	--

141:9 142:17 142:21 149:7 151:6 155:9 157:3 159:4 166:9 167:22 177:13,22 181:8 182:1 184:3 185:19 190:2 thinking 33:12 34:18 49:1 56:7 120:15 third 8:21 44:23 49:12 116:21 148:7 173:2 179:17 182:19 thirty 196:18 thomas 3:8 thorough 37:21 84:21 thoroughly 118:3 thought 25:22 73:16,19 78:15 92:15 128:7 133:15 170:3 thousand 22:20 72:18 95:18 96:21,23 106:6 140:18 145:13 146:24 180:3 thousands 80:6 threat 172:23	three 8:16,24 9:4 10:5,12 24:14 59:7 63:5 84:9,17 87:11 117:4,8 151:9 162:23 174:15 throw 114:11 tight 142:24 time 7:10,10 19:7 22:13 23:21 24:24 25:18,21 27:15 27:19,20 30:12 33:1 36:1 38:22 41:9 45:1,2,10 47:19 49:3 53:21 54:11 55:19,24 61:8 70:15 72:7 73:15 77:18 79:9,19 81:17 82:11,23 84:12 84:19 86:24 87:24 88:13 94:3 97:18 98:17,22 103:7 104:3,6 107:19 109:6 111:22 113:16 116:12 120:14,18,19 120:21 123:10 124:9 126:4 127:12 128:10	128:21 131:10 132:16 133:8 137:17 139:10 139:11,21 149:10 151:2 152:21 153:22 156:22 159:7 161:7 164:12 164:17 165:12 175:6,16 180:8 187:13 188:10 188:20 times 6:14 9:23 26:17 47:1 58:12 68:13 79:11 148:2 162:13 175:7 181:24 186:9 188:7 tin 61:4 title 15:16 58:23 63:3 167:15 titled 39:10 99:22 161:21 titles 16:3 tobacco 44:17 44:17 today 6:18,20 7:24 9:15 12:9 28:8 61:8 62:20 67:5 73:6,16 81:12 81:15 107:22 114:16,20	115:16 116:13 128:22 139:11 165:22 169:8 169:11 175:8 175:12 177:2 184:8,22 185:23 189:6 192:9,16 193:8 together 50:7 61:11 89:19 122:13 133:12 told 112:6,9 182:22 184:7 ton 83:10 took 19:22 20:11 101:10 122:15 123:17 155:16 174:23 188:15 tool 81:2 136:22 tooting 93:19 top 18:20 41:1 43:10 46:13 60:11 69:24 71:17 85:4 106:8 133:2 138:21 167:13 171:21 186:21 topic 23:7 25:23 26:15,18 90:10 112:11 123:8,9 135:15 177:16
---	--	---	---

<p>topics 25:6,9,14 26:2,7,11 30:1 39:16,20 total 8:24 54:18 55:10 58:7 59:3,9 71:2,21 75:21 79:20 95:6 97:7 104:2 105:17 109:4,16 113:12 116:24 144:9 146:1,8 147:9,22 181:1 181:22 183:9 183:24 184:4 totals 191:19 touch 17:8 53:24 touched 100:13 toward 34:20 112:11 118:12 towards 139:1 track 54:15 75:18 88:14 162:20 tracked 112:10 tracks 75:13 trade 23:13 26:23 44:21 47:7 100:20 traditional 35:12,15 50:1 50:5,13 51:9 90:19 92:13 190:14</p>	<p>transcribed 197:7 transcript 8:19 10:6,7 194:18 196:11,12 197:5,12 198:5 198:11,17 transcription 194:17 transfer 108:16 transferred 56:8 transition 16:7 trappers 11:20 11:22 travel 11:6 trend 47:19 121:6,8 123:13 153:13 157:19 158:2,4 tried 22:23 25:21 28:17 109:10,19 128:7 136:3 142:2,22 186:7 trigger 35:3,8 75:17 111:2 193:3 triggers 192:11 trip 90:9 true 156:23 157:20 186:19 194:18 trust 80:13</p>	<p>truth 194:12,12 194:13 truthful 7:24 try 7:1,2 34:11 135:2 149:18 150:21 152:16 trying 16:3 36:3 83:4 90:9 132:2 150:2,11 186:8 turn 31:7 40:21 43:8 64:7 69:16 82:1 102:6 116:21 148:5 158:8 two 10:1 16:18 16:19,20 24:19 26:17 33:17 59:4 66:1 99:9 119:3,23 126:8 142:18 162:22 type 21:13 25:20 39:8,12 46:7 53:23 86:8 89:9 126:19 129:14 156:7 162:4,10 163:1 164:17 172:22 173:2 173:20 types 33:17 37:4 43:13 52:11 127:22 typewriting 194:16</p>	<p>typical 12:13 35:11 73:11 79:19 168:19 173:18 typically 96:2,8 106:12 107:9 110:14 111:19 152:16 163:21 typing 45:18</p> <hr/> <p style="text-align: center;">u</p> <hr/> <p>u 8:6,6,6 u.s. 33:15 39:11 42:4,6 44:8,22 48:6,8 49:6,8 49:13,22 54:8 55:10,21 56:3 56:6,8,17 59:1 59:24 64:6,18 68:8 71:3 75:19 102:20 113:8 114:19 130:14 143:22 181:2 183:24 ultimate 191:16 ultimately 80:7 unavailable 83:6 under 6:21 12:11 33:16,21 36:7 41:1 43:5 43:7 52:6 70:1 75:11 94:19 102:16 127:9 136:6 143:12</p>
---	---	--	--

<p>190:5,10 192:13,15 undercount 82:20 undercounted 82:19 underlying 43:11 145:5 146:8 147:9,21 158:17 160:4 161:1 undermine 31:19 understand 6:21 7:6 25:15 34:6 47:18 50:23 77:6 79:18 83:17 84:23 94:19 113:14 123:22 123:24 137:7 149:19 150:19 155:3 190:2 understanding 21:1,21 22:15 24:24 28:12 29:14 32:24 33:2,6,10 35:10 37:19,22 47:12 56:22 60:8 72:6 73:10 75:5 81:13 82:23 87:1 89:1 96:1 96:3 98:9</p>	<p>113:22 137:14 143:20 145:10 165:13,16 176:2 177:18 understood 7:8 111:5 160:19 189:5 undetermined 194:6 unfortunately 71:24 73:8 81:15 105:10 127:18 132:12 143:21 146:3 155:17 169:6 174:16 182:12 united 1:1,12 44:21 55:15 67:3 104:3 112:18 130:12 141:23 144:11 146:1,17 194:6 university 19:15,18 unquote 192:5 unreliable 31:12 unsure 54:13 update 41:21 42:24 91:13 updated 41:23 42:23 63:9 65:23 91:10 156:1 157:12</p>	<p>upper 75:16 usa 118:13,16 167:7 usable 159:12 159:17 usage 135:20 use 12:18 22:19 23:22 56:20,21 56:24 57:1 58:3 59:23 71:8 73:13 75:24 91:24 92:4 93:2 108:19 112:3 120:24 125:17 125:21,23 127:4 139:20 149:14 152:3 154:5 160:20 165:7,13,16 178:12,23 179:9 183:3 185:17 used 22:4,9 24:5 37:10,17 41:20 43:12,18 43:21 46:9 47:23,24 57:6 59:12 63:15 65:9 70:12 72:9 81:3 93:1 93:11 95:10 106:9 109:15 111:4,18 113:3 113:20 114:5</p>	<p>116:1,9 117:11 119:3 120:3 127:16 128:24 130:11 131:21 142:15 144:4 152:11,24 154:2 157:14 157:23 158:1 163:16 164:20 165:9,23 168:13 169:3 169:13 170:16 171:14,15 174:6 177:9,19 182:15 183:18 189:13 192:16 useful 46:20 136:11 user 127:9 uses 43:15 111:19 159:21 160:3,10 171:12 177:23 using 61:3 83:13,16 89:2 89:2,13,16 92:20 121:12 177:5 178:5,11 179:4,7 192:7 usual 76:14 82:23 86:24 91:15 93:2 usually 96:17 utilize 70:20</p>
--	---	--	--

utilized 70:16	63:9,16,18	voids 25:7	184:17 185:15
uzi 191:13	64:8,21 65:3	vouch 116:14	185:18 188:9
v	65:16 66:16,19	vrabic 16:1,14	188:10,13
v 167:24 196:6	67:6,13,18	17:15 18:6	wanted 31:5,24
197:3 198:3	100:8 103:14	40:2 87:16,18	33:13 37:24
v5 167:23	156:16,19	87:21 89:13	46:19 47:13,15
valuable 93:20	163:1,12,12,16	vs 1:6	86:15 91:13
106:24 141:16	167:24 169:10	w	108:17 111:23
149:2	170:1,8,8,20,21	w 110:11	119:5 121:5
variant 190:24	170:21 171:4,8	wabash 1:16	122:5,8 123:6
191:1,13	173:24 174:1,9	2:6	127:8 129:18
variations	174:10 178:9	wait 79:13	136:5 148:22
143:19	versions 63:22	waived 194:21	154:5 157:17
various 138:24	155:18 168:1	196:19	157:22 174:7
158:24	versus 33:11	walking 47:24	186:3
varmint 177:11	50:13,13 56:14	want 9:20	wants 9:8
vary 147:21	64:24 117:14	14:22 17:10	171:11
vast 16:22	146:9	22:2 31:8 32:3	watch 38:10
43:24 49:22	vet 122:16	32:21 50:14	way 28:14
53:9 56:5 88:8	123:18	58:17 61:19	36:20 37:1
89:5 91:23	veteran 148:13	75:3 84:21	52:19 54:14
92:6 96:24	150:16	89:22 98:3	57:7 59:22
97:9 99:7	veterans	103:24 105:5	66:19 72:3
vendor 128:4,6	151:12 152:13	108:11,12	83:23 89:21
163:8	vetted 119:1,8	112:14 115:1	92:16 107:24
vendors 118:23	122:8	117:18 130:1	114:21 121:11
122:19 154:2	vice 27:17	132:22 133:22	121:14 138:17
verbiage	video 3:5	134:20,21	140:4 145:15
165:24	129:12 130:18	138:10,13,18	145:16 151:17
veritext 196:1,7	view 21:18	142:6 149:18	157:24 158:16
199:1	30:24	160:15,20	162:16,17,18
veritext.com.	visits 140:5	168:3 171:20	162:19 170:10
196:17	vogts 2:5 9:7	172:9 174:24	178:19 180:5
version 32:9	166:21	175:1,22 179:8	183:5 186:24
40:8 62:24		179:8 180:3,4	195:4,5

<p>ways 124:1 145:11 150:23 we've 130:22 170:7 192:8 weapon 178:16 179:20,20 weapons 14:14 98:19,21 140:8 178:18 website 44:3 48:20 52:4 73:17 76:4 79:10 82:5,14 82:24 83:14 84:3,3,12,13,13 85:1 86:6,8,16 87:11 90:18 99:11 141:8 143:10 182:19 187:11,12 190:4 websites 138:24 187:5 188:2 189:7 weed 135:2 136:3 weeding 128:9 128:12 weeks 179:23 weight 110:14 142:5 152:16 152:20 weighting 110:10,16,17 141:21 142:2,3</p>	<p>152:10,15 weird 77:22 welcome 7:17 wells 2:16 went 73:17 86:7 89:14 91:8,9 103:14 103:16 136:14 157:8 163:13 168:1,23 174:10,12 186:5 190:4 whereof 195:7 wife 11:2 wild 12:19 17:21 28:20 wilmington 19:16 win 107:4 126:11 134:22 134:24 wipe 126:2 wish 132:13 wit 194:3 witness 4:2 6:1 6:4 8:12 13:19 29:7,20 30:23 31:18 39:1 78:11,13 79:8 87:6 102:11 105:21 108:6,8 109:19 114:10 131:2 137:7 140:10 145:9 146:13 150:21</p>	<p>166:7 176:11 180:1,11 186:1 188:13 189:24 190:2 191:22 194:5,14,16,19 196:8,11 197:1 197:4,11 198:1 198:4,15 witness' 196:14 word 133:1 162:11 words 150:17 work 11:18 12:14,19,19 13:12 14:17,23 17:2 18:14 19:1,6 20:10 29:16,17 31:20 36:9,13,15 37:10,18,21 63:21 81:3 88:16,24 89:18 100:18 118:19 118:21 119:5,5 119:13 120:1 120:11,12,15 122:7,23 123:14 125:10 125:11 worked 8:15 10:15 14:16 20:20 24:3 27:24 28:1,20 33:1 34:9 39:2 39:3,13 40:3</p>	<p>40:13,13,15 64:4 91:11 93:13 119:6 122:10 123:16 130:12 132:14 155:8 163:7 167:9 working 26:21 36:1 72:7 87:24 119:12 140:12 165:12 worry 82:8 worth 63:5 writing 151:4 160:17 written 14:5,8 26:6 87:16 133:10 185:6 wrong 47:5 159:8 wrote 71:14 133:12 172:3 173:11,16 186:1</p>
			x
			x 4:1 5:1 22:22 50:5 90:21 143:11
			y
			yeah 22:18 23:2 26:13 31:21 32:20 34:2,10 41:12 53:14,15 57:4

[yeah - zeros]

61:18 64:24	91:3,19 98:7
67:15,22,23	100:6 117:1,5
68:18 70:15	117:9,13 120:4
78:4,5,13 79:8	128:15 131:11
80:10 84:8	132:5 134:18
85:12 88:6	140:2,11 143:2
91:5 94:2 97:8	148:20 151:9
98:22 102:11	152:14 155:19
103:13 105:21	156:1,6 157:15
113:11 114:20	159:6,9 161:3
116:10 117:14	165:5 173:13
120:4 123:13	173:14 174:24
131:18 134:15	176:24 182:12
143:19 145:9	182:14 186:23
153:3 168:22	189:1
170:15,19	yellow 80:16,20
178:19 180:11	81:2,13 85:11
180:11 181:9	85:12
year 17:12	yep 64:23
24:11 41:7	111:15 113:12
53:20,22,23,24	117:8,15 160:1
69:12 79:22	173:22
84:6 85:3	yesterday 10:2
90:15 91:2,6	10:3,13 59:19
91:10,11,18,22	65:4 100:13
95:11 98:22	
154:20	z
years 14:21	zero 80:15
19:3 20:21	82:18 83:8,18
24:8,14 40:10	85:6 95:21
45:11 48:24	97:20 143:24
52:23 57:13	183:17 187:22
62:15 63:5,21	zeroed 95:24
64:15 66:22	zeros 84:22
77:19 88:6	

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days

after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate.

The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.