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

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

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

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES</p> <p>2</p> <p>3 SEAN A. BRADY, ESQ. Michel & Associates, P.C. 4 180 E Ocean Boulevard, Suite 200 Long Beach, California 90802 5 Sbrady@michellawyers.com 6 Counsel for Plaintiff Pisa Armory, LLC 7 DAVID G. SIGALE, ESQ. Law Firm of David G. Sigale, P.C. 8 55 W 22nd Street, Suite 230 Lombard, Illinois 60148 9 Dsigale@sigalelaw.com 10 Counsel for Plaintiff Harrell 11 ANDREW A. LOTHSON, ESQ. Swanson, Martin & Bell, LLP 12 330 N Wabash, Suite 3300 Chicago, Illinois 60611 13 Alothson@smbtrials.com 14 Counsel for Plaintiff Barnett 15 JOHN HAZINSKI, ESQ. MICHAEL TRESNOWSKI, ESQ. 16 Illinois Attorney General 115 S LaSalle Street 17 Chicago, Illinois 60603 John.Hazinski@ilag.gov 18 Michael.tresnowski@ilag.gov 19 Counsel for Defendants 20 KATELYN GANNON, ESQ. Evans & Dixon 21 211 N Broadway Street, Suite 2500 Saint Louis, Missouri 63102 22 Kgannon@evans-dixon.com 23 Counsel for Defendant Walker 24</p>	<p style="text-align: right;">Page 4</p> <p>1 INDEX</p> <p>2</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;"></th> <th style="width: 50%; text-align: right;">PAGE</th> </tr> </thead> <tbody> <tr> <td>3 EXAMINATION</td> <td></td> </tr> <tr> <td>4 By Mr. Hazinski</td> <td style="text-align: right;">5</td> </tr> <tr> <td>5</td> <td></td> </tr> <tr> <td>6 EXHIBITS</td> <td></td> </tr> <tr> <td>7</td> <td></td> </tr> <tr> <td>8</td> <td></td> </tr> <tr> <td>9 Exhibit 1 Notice of Deposition</td> <td style="text-align: right;">9</td> </tr> <tr> <td>10 Exhibit 2 Profit & Loss Statement</td> <td style="text-align: right;">16</td> </tr> <tr> <td>11 Exhibit 3 Answers to Interrogatories</td> <td style="text-align: right;">23</td> </tr> <tr> <td>12 Exhibit 4 Verification</td> <td style="text-align: right;">23</td> </tr> <tr> <td>13 Exhibit 5 Supplemental Answers to Interrogatories</td> <td style="text-align: right;">32</td> </tr> <tr> <td>14 Exhibit 6 Deposition Transcript</td> <td style="text-align: right;">52</td> </tr> <tr> <td>15 Exhibit 7 ATF Bound Book</td> <td style="text-align: right;">55</td> </tr> <tr> <td>16</td> <td></td> </tr> <tr> <td>17 (Exhibits to be attached to transcript)</td> <td></td> </tr> <tr> <td>18</td> <td></td> </tr> <tr> <td>19</td> <td></td> </tr> <tr> <td>20</td> <td></td> </tr> <tr> <td>21</td> <td></td> </tr> <tr> <td>22</td> <td></td> </tr> <tr> <td>23</td> <td></td> </tr> <tr> <td>24</td> <td></td> </tr> </tbody> </table>		PAGE	3 EXAMINATION		4 By Mr. Hazinski	5	5		6 EXHIBITS		7		8		9 Exhibit 1 Notice of Deposition	9	10 Exhibit 2 Profit & Loss Statement	16	11 Exhibit 3 Answers to Interrogatories	23	12 Exhibit 4 Verification	23	13 Exhibit 5 Supplemental Answers to Interrogatories	32	14 Exhibit 6 Deposition Transcript	52	15 Exhibit 7 ATF Bound Book	55	16		17 (Exhibits to be attached to transcript)		18		19		20		21		22		23		24	
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<p style="text-align: right;">Page 3</p> <p>1 ANDREW HOERNER, ESQ. Becker, Hoerner & Ysura, P.C. 2 5111 W Main Street Belleville, Illinois 62226 3 Kah@bhylaw.com 4 Counsel for Defendant St. Clair County 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>	<p style="text-align: right;">Page 5</p> <p>1 PIASA ARMORY, LLC 2 SCOTT PULASKI, 3 Called as a witness after having been first duly 4 sworn, testified as follows: 5 DIRECT EXAMINATION 6 BY MR. HAZINSKI: 7 Q. Good morning, Mr. Pulaski. How are you 8 doing? 9 A. Good. Well. 10 Q. Thank you for being here today. 11 Before we get started, I just want to 12 note for the record that we served two notices of 13 deposition for Mr. Pulaski today. One is a 30(b)(6) 14 notice for Piasa Armory, and the other individual 15 notice to Mr. Pulaski. 16 I discussed with plaintiff's counsel, 17 Mr. Brady, before we started, that we'll just proceed 18 as one deposition, one transcript, and we'll demark 19 it between the two lines of questioning for each 20 of those notices as we go, so that we can simplify 21 matters a little bit. 22 Mr. Pulaski, you've given depositions 23 before, correct? 24 A. Just one, yes.</p>																																														

Page 6	<p>1 Q. One deposition.</p> <p>2 So I'm going to go over some ground rules</p> <p>3 you might be familiar with from that previous depo-</p> <p>4 sition, but the goal is to help things go a little</p> <p>5 more smoothly this morning.</p> <p>6 So, first, do you understand that you're</p> <p>7 under oath, the same as if -- as if you were testify-</p> <p>8 ing in court?</p> <p>9 A. I do.</p> <p>10 Q. Since we have a court reporter on the line</p> <p>11 who's taking down everything we're saying, it's</p> <p>12 important that we try not to talk over each other, so</p> <p>13 if you can wait until I finish asking questions to</p> <p>14 answer, I will also try to avoid asking another</p> <p>15 question before you finish answering, okay?</p> <p>16 A. Yes.</p> <p>17 Q. If you're looking at anything in front of</p> <p>18 you, whether it's a piece of paper or something on</p> <p>19 the screen, could you please let me know what it is</p> <p>20 that you're looking at?</p> <p>21 A. The only thing I have in front of me is the</p> <p>22 computer screen and various pieces of blank paper on</p> <p>23 my desk, so I have a blank notepad; and that's about</p> <p>24 it.</p>	Page 8	<p>1 break at any time during the deposition, whether to</p> <p>2 use the restroom, or for any other purpose, but I</p> <p>3 would just ask that you don't take a break while I</p> <p>4 have a question pending to you; is that fair?</p> <p>5 A. Yes.</p> <p>6 Q. Do you have any medical conditions, or are</p> <p>7 you taking any medication that might affect your</p> <p>8 ability to give truthful testimony this morning?</p> <p>9 A. I am not.</p> <p>10 Q. Could you please state your full name for</p> <p>11 the record?</p> <p>12 A. My name is Eric Scott Pulaski.</p> <p>13 Q. Mr. Pulaski, Piasa Armory is a plaintiff in</p> <p>14 the Federal Firearms Licensees of Illinois versus</p> <p>15 Pritzker case in the Southern District of Illinois,</p> <p>16 No. 23-cv-215; is that correct?</p> <p>17 A. Yes.</p> <p>18 Q. You understand that case has been consoli-</p> <p>19 dated with three other cases that are pending in that</p> <p>20 same court, correct?</p> <p>21 A. I do understand.</p> <p>22 Q. And do you understand that your testimony</p> <p>23 that you give today might be used in all of these</p> <p>24 consolidated cases?</p>
Page 7	<p>1 Q. All right. If you end up looking at any</p> <p>2 documents, pulling them on the computer or in paper</p> <p>3 copy, please just let me know.</p> <p>4 Is there anyone in the room with you</p> <p>5 right now?</p> <p>6 A. No, sir.</p> <p>7 Q. If I don't -- if I ask a question that you</p> <p>8 don't understand or that doesn't make sense to you,</p> <p>9 please ask me to clarify it. If you answer the</p> <p>10 question, I'll assume that you understood it; is that</p> <p>11 fair?</p> <p>12 A. Yes.</p> <p>13 Q. That includes if there's an issue with</p> <p>14 technology. Since we're using a Zoom platform, if</p> <p>15 there's any glitch or technological issue, please let</p> <p>16 me know; is that all right?</p> <p>17 A. Yes.</p> <p>18 Q. During the questioning, your attorney may</p> <p>19 object to certain questions that I ask. You should</p> <p>20 still answer the question, unless your attorney</p> <p>21 specifically instructs you not to answer. Do you</p> <p>22 understand?</p> <p>23 A. Yes.</p> <p>24 Q. I want to let you know that you can take a</p>	Page 9	<p>1 A. I do.</p> <p>2 MR. HAZINSKI: I'd like to show you now</p> <p>3 the first exhibit. I'll attempt to share my screen.</p> <p>4 (Exhibit 1 marked.)</p> <p>5 BY MR. HAZINSKI:</p> <p>6 Q. Mr. Pulaski, do you see a document in front</p> <p>7 of you that says Notice of Rule (30)(b)(6) Deposi-</p> <p>8 tion?</p> <p>9 A. I do.</p> <p>10 Q. Have you seen this document before?</p> <p>11 A. I have not.</p> <p>12 Q. I'll scroll through it so you can look.</p> <p>13 Does the second page of this document</p> <p>14 with the number of paragraphs look familiar to you?</p> <p>15 A. That doesn't look familiar to me, no.</p> <p>16 I did receive notice through our</p> <p>17 attorney, but I don't have a recollection of that</p> <p>18 particular layout or page.</p> <p>19 Q. So this isn't a document that you reviewed</p> <p>20 in preparation for your deposition today, correct?</p> <p>21 A. No.</p> <p>22 MR. HAZINSKI: Sean, did you -- Can we go</p> <p>23 off the record briefly?</p> <p>24 THE COURT REPORTER: Yes.</p>

Page 10	<p>1 MR. HAZINSKI: Thank you.</p> <p>2 (Discussion held off the record.)</p> <p>3 MR. HAZINSKI: We had a brief discussion</p> <p>4 between myself and Mr. Brady.</p> <p>5 I want to note for the record that to the</p> <p>6 extent that Mr. Pulaski wasn't provided the specific</p> <p>7 topics that we served in this Notice of 30 (b)(6)</p> <p>8 Deposition in advance, that's not consistent with the</p> <p>9 requirements of preparation for the format of this</p> <p>10 deposition, and to the extent the witness is</p> <p>11 unprepared to answer with respect to any of the</p> <p>12 topics, we'll reserve the right to -- to redepose</p> <p>13 the witness with proper preparation, as required in</p> <p>14 Federal Rules.</p> <p>15 Mr. Brady, can you confirm that</p> <p>16 Mr. Pulaski is designated as the witness under Rule</p> <p>17 (30)(b)(6) to testify on Piasa Armory's behalf as</p> <p>18 to these listed topics?</p> <p>19 MR. BRADY: As I indicated off the</p> <p>20 record, Mr. Pulaski is the sole operator of Piasa</p> <p>21 Armory, LLC, and so I can confirm that.</p> <p>22 If you want to ask the witness if he</p> <p>23 would be the most -- I mean, you can go through these</p> <p>24 topics and ask the witness on the record.</p>	Page 12	<p>1 your preparation?</p> <p>2 A. We did not.</p> <p>3 Q. Mr. Pulaski, do you understand that you</p> <p>4 have been designated under Rule (30)(b)(6) to testify</p> <p>5 on Piasa Armory's behalf as to the topics listed in</p> <p>6 this Notice of Deposition?</p> <p>7 A. I do.</p> <p>8 Q. Do you understand that that means that</p> <p>9 with respect to these topics, your testimony will be</p> <p>10 treated as Piasa Armory's testimony, for the purposes</p> <p>11 of this case?</p> <p>12 A. I understand.</p> <p>13 Q. What is your role at Piasa Armory?</p> <p>14 A. I am the owner of Piasa Armory.</p> <p>15 Q. Are you familiar with all aspects of</p> <p>16 Piasa's business operations?</p> <p>17 A. I am.</p> <p>18 MR. BRADY: Objection, vague as to all</p> <p>19 aspects.</p> <p>20 BY MR. HAZINSKI:</p> <p>21 Q. Are you familiar the items Piasa offers for</p> <p>22 sale?</p> <p>23 A. I am.</p> <p>24 Q. Does Piasa have any other employees?</p>
Page 11	<p>1 MR. HAZINSKI: My question is just</p> <p>2 whether he is the -- he is, in fact, the designee?</p> <p>3 MR. BRADY: He is, in fact, the designee.</p> <p>4 MR. HAZINSKI: That's -- that's all I'm</p> <p>5 saying. Thank you.</p> <p>6 Mr. Pulaski, what did you do to prepare</p> <p>7 for this deposition?</p> <p>8 THE WITNESS: Discussed these topics with</p> <p>9 our attorney.</p> <p>10 BY MR. HAZINSKI:</p> <p>11 Q. On how many --</p> <p>12 MR. BRADY: Objection to the extent it</p> <p>13 calls for attorney/client communications.</p> <p>14 BY MR. HAZINSKI:</p> <p>15 Q. Mr. Pulaski, I'm not interested in the</p> <p>16 substance of any conversations you've had with your</p> <p>17 attorneys to prepare for this deposition, because</p> <p>18 that's privileged; but can you tell me how many times</p> <p>19 you met with your attorneys to prepare?</p> <p>20 A. Twice.</p> <p>21 Q. How long were each of those meetings?</p> <p>22 A. I don't recall, somewhere between 30</p> <p>23 minutes and one hour, approximately.</p> <p>24 Q. Did you review any documents as part of</p>	Page 13	<p>1 A. We do.</p> <p>2 Q. How many?</p> <p>3 A. Approximately six that handle -- yes,</p> <p>4 approximately six.</p> <p>5 Q. Are there any other owners besides</p> <p>6 yourself?</p> <p>7 A. No.</p> <p>8 Q. How long has Piasa Armory existed?</p> <p>9 A. We were formed in 2012.</p> <p>10 Q. And what services does Piasa offer?</p> <p>11 A. Retail sales. We also do training and</p> <p>12 gunsmith services, and we have a shooting range.</p> <p>13 Q. Focusing on sales, does Piasa primarily</p> <p>14 sell firearms to individuals or to other organiza-</p> <p>15 tions?</p> <p>16 A. We sell to both.</p> <p>17 Q. Do you sell more frequently to individuals</p> <p>18 than to organizations, or vice versa?</p> <p>19 A. To individuals, more frequently.</p> <p>20 Q. I'm going to refer throughout the deposi-</p> <p>21 tion to a law called the Protect Illinois Communities</p> <p>22 Act.</p> <p>23 Are you familiar with that law?</p> <p>24 A. I am.</p>

Page 14	<p>1 Q. If I call it PICA, will you understand that</p> <p>2 I'm referring to that law?</p> <p>3 A. I will.</p> <p>4 Q. Does Piasa sell firearms to individuals who</p> <p>5 are exempt from PICA's restrictions on the purchase</p> <p>6 of firearms?</p> <p>7 A. We do.</p> <p>8 Q. What proportion of Piasa's customers would</p> <p>9 you say are exempt?</p> <p>10 A. I couldn't put a number to it, but very,</p> <p>11 very few.</p> <p>12 Q. Does Piasa sell firearms to any organiza-</p> <p>13 tions that are exempt from PICA's purchase restric-</p> <p>14 tions?</p> <p>15 A. We can, yes.</p> <p>16 Q. Can you explain that?</p> <p>17 A. Law enforcement agencies or certain other</p> <p>18 government groups would be exempt from that.</p> <p>19 Q. And Piasa sometimes sells to law enforce-</p> <p>20 ment agencies and similar groups?</p> <p>21 A. Yes.</p> <p>22 Q. Is it fair to say that for the category</p> <p>23 of Piasa's customers that are exempt from PICA's</p> <p>24 restrictions, Piasa is able to continue selling the</p>	Page 16	<p>1 plaintiff in a pending case in Madison County; is</p> <p>2 that correct?</p> <p>3 A. Yes, sir.</p> <p>4 Q. And that case pertains to regulations of</p> <p>5 firearms marketing, correct?</p> <p>6 A. Yes.</p> <p>7 MR. BRADY: Objection, vague as to</p> <p>8 firearms marketing.</p> <p>9 BY MR. HAZINSKI:</p> <p>10 Q. In this litigation, are you aware if Piasa</p> <p>11 has produced any copies of any of its advertising or</p> <p>12 marketing materials?</p> <p>13 A. Not to my knowledge; but my understanding</p> <p>14 is that's not the scope of this testimony today.</p> <p>15 Q. Has Piasa Armory been a party in any other</p> <p>16 litigation apart from that Madison County case?</p> <p>17 A. Just the Madison County case.</p> <p>18 MR. HAZINSKI: All right. I'll show you</p> <p>19 a -- another exhibit now. This, for the record, will</p> <p>20 come in as Exhibit 2, and it's documents with a Bates</p> <p>21 stamp Piasa_000437 through 449.</p> <p>22 (Exhibit 2 marked.)</p> <p>23 BY MR. HAZINSKI:</p> <p>24 Q. Mr. Pulaski, are you able to see this</p>
Page 15	<p>1 same firearms that they were able to sell before PICA</p> <p>2 went into effect?</p> <p>3 A. Yes. We are still able to sell to exempt</p> <p>4 people.</p> <p>5 Q. Does Piasa sell firearms to other busi-</p> <p>6 nesses?</p> <p>7 A. We have in the past, but not frequently.</p> <p>8 Q. What kinds of businesses?</p> <p>9 A. Other firearm dealers.</p> <p>10 Q. Other than law enforcement agencies and</p> <p>11 similar governmental entities, does Piasa sell</p> <p>12 firearms to any other groups or organizations?</p> <p>13 A. Organizations, yes.</p> <p>14 Q. Which ones?</p> <p>15 A. Charitable organizations, such as Friends</p> <p>16 of the NRA and Ducks Unlimited.</p> <p>17 Q. Other than law enforcement agencies,</p> <p>18 similar government organizations, and charitable</p> <p>19 organizations like the ones you mentioned, does Piasa</p> <p>20 sell firearms to any other groups or organizations?</p> <p>21 A. We have the ability to sell to any other</p> <p>22 organizations, but I do not recall any that we've</p> <p>23 sold to recently.</p> <p>24 Q. All right. Piasa Armory is currently a</p>	Page 17	<p>1 document that I shared?</p> <p>2 A. Yes.</p> <p>3 Q. Have you seen it before?</p> <p>4 A. I have.</p> <p>5 Q. What is it?</p> <p>6 A. It's our Profit and Loss Statement for</p> <p>7 2018.</p> <p>8 Q. I'll script -- I'll scroll through the</p> <p>9 document briefly, let you see the entire thing.</p> <p>10 If you'd like me to go more slowly, or</p> <p>11 you need to see another part of it, please just ask.</p> <p>12 These documents show Piasa profits and</p> <p>13 expenses for every year starting in 2018 through</p> <p>14 2023, correct?</p> <p>15 A. Correct.</p> <p>16 Q. I want to return to the page stamped Piasa</p> <p>17 437. One of the rows in this document is labeled</p> <p>18 30100 Sales; it's the first row there.</p> <p>19 Can you explain what's included in that</p> <p>20 category?</p> <p>21 A. Yes. That category says Firearm Sales.</p> <p>22 Q. Well, there's a row that says 30100 that</p> <p>23 just says Sales, and then below that is 30110, which</p> <p>24 says Firearm Sales. Do you see that?</p>

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<p>1 A. I do.</p> <p>2 Q. Does the Sales line include the Firearm</p> <p>3 Sales?</p> <p>4 A. It does.</p> <p>5 In the past we had broken out our Sales</p> <p>6 by category, and we no longer do that as part of our</p> <p>7 accounting practices.</p> <p>8 Q. So data years after 2018 itemize which</p> <p>9 sales are attributable to firearms, correct?</p> <p>10 A. We may have some of that data split out</p> <p>11 still, but in general, we just have a raw sales</p> <p>12 number.</p> <p>13 Q. All right. Are you paid a fixed salary, or</p> <p>14 are you paid through an owner's draw?</p> <p>15 A. I'm paid through a guaranteed payment.</p> <p>16 Q. How does the guaranteed payment work?</p> <p>17 A. The way that our accounting -- our tax</p> <p>18 accountant explained to me was that I pay myself a</p> <p>19 certain amount for a certain period.</p> <p>20 For me, it's weekly.</p> <p>21 Q. And do you determine that amount?</p> <p>22 A. I do.</p> <p>23 Q. So these documents show the overall profits</p> <p>24 and losses of Piasa Armory for those years, 2018</p>	<p>1 above the cost of goods sold.</p> <p>2 Q. I see.</p> <p>3 So the gross revenues correspond to the</p> <p>4 line labeled Total Income; is that what you're</p> <p>5 saying?</p> <p>6 A. Yes.</p> <p>7 Q. And in 2018, that number is about 958,000,</p> <p>8 correct?</p> <p>9 I'm sorry. If you answered, I didn't</p> <p>10 hear.</p> <p>11 A. I'm sorry, I didn't hear it was a question.</p> <p>12 Yes, that says 958,000 on the line.</p> <p>13 Q. Thank you.</p> <p>14 Are the net income figures that you</p> <p>15 identified that are the last line of each Profit and</p> <p>16 Loss Statement, are those net income figures a good</p> <p>17 reflection of the overall financial health of Piasa</p> <p>18 Armory?</p> <p>19 MR. BRADY: Objection, vague.</p> <p>20 THE WITNESS: (Inaudible).</p> <p>21 THE COURT REPORTER: What was the answer?</p> <p>22 MR. BRADY: Mr. Hazinski, were you -- did</p> <p>23 you finish your question? I'm sorry.</p> <p>24 MR. HAZINSKI: The question was finished,</p>
Page 19	Page 21
<p>1 through 2023, correct?</p> <p>2 A. Yes.</p> <p>3 Q. Which data in these documents show the</p> <p>4 overall profitability of Piasa Armory?</p> <p>5 A. My understanding is that that is the final</p> <p>6 line on each year's Profit and Loss Statement.</p> <p>7 Q. Are you referring to the line labeled Net</p> <p>8 Income?</p> <p>9 A. Yes.</p> <p>10 Q. If you want to determine year over year</p> <p>11 whether the business is doing better or worse, do you</p> <p>12 compare the net income numbers to make that assess-</p> <p>13 ment?</p> <p>14 A. I typically compare our gross revenues and</p> <p>15 the categories of items that we sell based on point</p> <p>16 of sale data.</p> <p>17 Q. So when you say "gross revenues," for</p> <p>18 example, in the 2018 data, would that correspond to</p> <p>19 the line that says Gross Profit?</p> <p>20 A. Yes.</p> <p>21 Q. And in 2018, that's approximately \$290,000,</p> <p>22 correct?</p> <p>23 A. I apologize.</p> <p>24 I'm looking at the Total Income line</p>	<p>1 yeah.</p> <p>2 MR. BRADY: Objection, vague, as to</p> <p>3 overall health.</p> <p>4 THE WITNESS: I am not an accountant, so</p> <p>5 I don't speak to the overall financial health of our</p> <p>6 company. That'd be for our tax accountant to take</p> <p>7 care of.</p> <p>8 BY MR. HAZINSKI:</p> <p>9 Q. I suppose another way to ask the question</p> <p>10 is in 2018, for example, there's a net income of</p> <p>11 about negative \$20,000, right?</p> <p>12 A. Yes.</p> <p>13 Q. You still drew a salary in -- in that year,</p> <p>14 as an owner of Piasa, right?</p> <p>15 A. I do, yes.</p> <p>16 Q. The net income might be higher or lower,</p> <p>17 depending on how large the salary you draw is, right?</p> <p>18 A. That's correct.</p> <p>19 Q. If you wanted to compare the success of</p> <p>20 your business year over year, that comparison would</p> <p>21 depend on what you discussed, the gross revenues</p> <p>22 rather than just the net income figure, right?</p> <p>23 A. Correct.</p> <p>24 Q. Piasa had roughly the same total income in</p>

<p style="text-align: right;">Page 22</p> <p>1 2022 as in 2023, correct?</p> <p>2 A. I don't have those numbers memorized. I</p> <p>3 would need to review them.</p> <p>4 Q. Okay. I'm scrolling within the same</p> <p>5 Exhibit 2 down to page marked Piasa_446. For 2022,</p> <p>6 the total income was about \$867,000, correct?</p> <p>7 A. Yes.</p> <p>8 Q. In 2023, the total income -- this is on</p> <p>9 Piasa_448 -- in 2023, the total income was</p> <p>10 approximately \$854,000, correct?</p> <p>11 A. Yes.</p> <p>12 Q. So roughly 2% decrease; is that fair?</p> <p>13 A. I would have to get a calculator for that,</p> <p>14 but I'll assume you're correct.</p> <p>15 Q. In 2021, the total income reflected on</p> <p>16 Piasa_442 in Exhibit 2 was \$976,100, approximately,</p> <p>17 correct?</p> <p>18 A. Yes.</p> <p>19 Q. Fair to say there was a much larger</p> <p>20 decrease between 2021 and 2022 than there was between</p> <p>21 2022 and 2023?</p> <p>22 A. Yes.</p> <p>23 MR. HAZINSKI: I'd like to show you</p> <p>24 another document now. This one will be Exhibit 3 for</p>	<p style="text-align: right;">Page 24</p> <p>1 swearing to the truth of the interrogatory responses</p> <p>2 in Exhibit 3 that we just looked at, correct?</p> <p>3 A. Yes.</p> <p>4 Q. Before signing this Verification, did you</p> <p>5 carefully review all of the interrogatory answers to</p> <p>6 make sure that they're correct?</p> <p>7 A. I did.</p> <p>8 Q. Thank you.</p> <p>9 I'll return to Exhibit 3.</p> <p>10 Looking specifically at Interrogatory No.</p> <p>11 4 and the response, Mr. Pulaski, do you see the</p> <p>12 response to interrogatory No. 4 that states</p> <p>13 "Responding Party has ceased offering for sale in</p> <p>14 Illinois to non-exempts purchasers all items that</p> <p>15 PICA restricts?"</p> <p>16 A. I do.</p> <p>17 Q. I'd like to clarify that answer.</p> <p>18 Is it fair to say that Piasa Armory</p> <p>19 didn't actually sell all items that PICA restricts?</p> <p>20 A. Well, it's impossible to sell all items or</p> <p>21 stock all items that PICA restricts. Some of them</p> <p>22 are very difficult to acquire; however, we are able</p> <p>23 to offer for sale or transfer ownership of items that</p> <p>24 PICA restricts.</p>
<p style="text-align: right;">Page 23</p> <p>1 the deposition.</p> <p>2 (Exhibit 3 marked.)</p> <p>3 BY MR. HAZINSKI:</p> <p>4 Q. Mr. Pulaski, are you able to see this</p> <p>5 document titled Plaintiff Piasa Armory's Response to</p> <p>6 State Defendants' Interrogatories, Set One?</p> <p>7 A. I am.</p> <p>8 Q. If the text is ever too small, or you're</p> <p>9 having difficulty seeing it, please just let me know,</p> <p>10 okay?</p> <p>11 A. Yes.</p> <p>12 Q. Do you recognize this document?</p> <p>13 A. I do.</p> <p>14 MR. HAZINSKI: Apologies to shift gears,</p> <p>15 but I'll show one more document, which we'll mark as</p> <p>16 Exhibit 4 for the deposition.</p> <p>17 (Exhibit 4 marked.)</p> <p>18 BY MR. HAZINSKI:</p> <p>19 Q. Mr. Pulaski, can you see this document</p> <p>20 titled Verification?</p> <p>21 A. I do.</p> <p>22 Q. Do you recognize it?</p> <p>23 A. I do.</p> <p>24 Q. This document contains your signature</p>	<p style="text-align: right;">Page 25</p> <p>1 Q. Did PICA -- Strike that.</p> <p>2 Did Piasa sell grenade launchers before</p> <p>3 PICA went into effect?</p> <p>4 A. We are able to sell grenade launchers, and</p> <p>5 we had transferred ownership of a grenade launcher</p> <p>6 before PICA existed.</p> <p>7 Q. When you say "transferred ownership," can</p> <p>8 you explain what that means?</p> <p>9 A. Customers are allowed to purchase firearms</p> <p>10 or any other items regulated by ATF, either online,</p> <p>11 by phone, or in person out of state. When those</p> <p>12 purchases are made, they must be sent to a dealer in</p> <p>13 that purchaser's state, and that dealer must complete</p> <p>14 the required 4473 and background check.</p> <p>15 Q. Piasa transferred just one grenade launcher</p> <p>16 in its history?</p> <p>17 A. Yes.</p> <p>18 Q. Did Piasa -- Strike that.</p> <p>19 Before PICA went into effect, did Piasa</p> <p>20 sell shotguns (inaudible) cylinders?</p> <p>21 THE COURT REPORTER: Shotguns what?</p> <p>22 MR. HAZINSKI: Shotguns with revolving</p> <p>23 cylinders.</p> <p>24 THE COURT REPORTER: Thank you.</p>

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1 THE WITNESS: Those firms are not common-

2 ly available for purchase. They're highly restricted

3 by ATF as an NFA-regulated items, National Firearms

4 Act-regulated item, and we have never transferred

5 ownership of one or sold one.

6 BY MR. HAZINSKI:

7 Q. When Piasa transfers ownership, does Piasa

8 receive proceeds from the sale?

9 A. We do.

10 Let me correct that.

11 We don't receive proceeds from the sale

12 of the item, we receive a fee for conducting the

13 background check and processing the paperwork.

14 Q. Thank you.

15 Before PICA went into effect, if a

16 customer had come into Piasa and asked to purchase a

17 shotgun with a revolving cylinder, what would have

18 you -- what would Piasa typically informed that cus-

19 tomer?

20 MR. BRADY: Objection, incomplete hypo-

21 thetical.

22 You can answer.

23 THE WITNESS: We would have directed the

24 customer to one of several online sites or auction

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1 houses or other online retailers to search for that

2 item that they were looking for.

3 BY MR. HAZINSKI:

4 Q. Would Piasa have facilitated or partici-

5 pated in that transfer in that situation?

6 A. So long as it complied with State and

7 Federal law, yes.

8 Q. Did that ever occur before PICA went into

9 effect at Piasa?

10 A. As I answered before, we've never transfer-

11 red ownership of a firearm with a revolving -- a

12 shotgun with revolving cylinder like a Street

13 Sweeper.

14 Q. Thank you.

15 Looking again at Exhibit 3, I want to

16 direct your attention to Interrogatory No. 5, which

17 asks Piasa to identify -- for each year from 2020

18 through 2023, identify what proportion of the total

19 firearms you sold were firearms of the types

20 regulated by PICA. Do you see that?

21 A. I do.

22 Q. Piasa's response stated "Responding Party

23 estimates the total was approximately 20-40% of its

24 business."

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1 Did I read that correctly?

2 A. Yes.

3 Q. In this response, 20-40% of its business,

4 does that phrase refer to the proportion of firearms

5 sold, or to something else?

6 A. That would refer to the total number of

7 firearms sold or transferred.

8 Q. So when you say "20-40% of its business,"

9 that refers to 20-40% of all firearms sold or

10 transferred, rather than 20-40% of Piasa's revenues,

11 for example?

12 A. Correct.

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

14 A. Through my experience with the firearms --

15 with this firearms business and with our transfers,

16 sales, and the paperwork that we complete.

17 Q. Which documents did you look at to generate

18 that estimate?

19 A. Form 4473 from ATF.

20 Q. What information on Form 4473 helped you

21 generate the 20-40% estimate?

22 A. The items on that -- on the Form 4473 are

23 each firearm that's transferred, each owner -- each

24 firearm that's transferred ownership of.

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1 Q. Does Form 4473 list every firearm that

2 Piasa Armory transferred within that time period?

3 A. Every firearm that was transferred to a

4 nonlicensed individual, Form 4473 is used.

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

6 firearm?

7 A. That's at the discretion of each dealer.

8 We can put as many firearms on each form as we would

9 like.

10 We choose to -- to use that style of

11 recordkeeping, rather than doing one form for each

12 individual firearm.

13 Q. I'd like to understand a little better how

14 this information is documented; so am I right that

15 on this ATF Form 4473, Piasa lists out all of the

16 firearms that Piasa transferred to nonlicensed

17 individuals and nonlicensed -- that means they're not

18 licensed as firearm dealers, correct?

19 A. Correct.

20 Q. Is there a single Form 4473 that lists

21 every firearm that Piasa transferred to those

22 individuals within the time period of 2020 to 2023?

23 A. Can you clarify that?

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

<p style="text-align: right;">Page 30</p> <p>1 out? How many firearms might be listed on one form?</p> <p>2 A. That is case by case, dependent on each</p> <p>3 purchaser. There's no restriction to the number of</p> <p>4 firearms purchased by each individual.</p> <p>5 Q. Does Piasa complete one form for each</p> <p>6 firearm transaction?</p> <p>7 A. Transaction, yes, not per firearm.</p> <p>8 Q. Understood.</p> <p>9 So for the period from 2020 through 2023,</p> <p>10 how many copies of the Form 4473 did Piasa Armory</p> <p>11 create?</p> <p>12 A. What was the period again?</p> <p>13 Q. From 2020 through 2023.</p> <p>14 A. We complete approximately 2500 to 3200</p> <p>15 forms a year.</p> <p>16 Q. That would -- for this period of a</p> <p>17 four-year span would generate, at least on that</p> <p>18 estimate, around a thousand copies of Form 4473,</p> <p>19 right?</p> <p>20 A. No, sir, that'd be 2500 to 3400; each form,</p> <p>21 not each firearm.</p> <p>22 Q. So each year, there are 2500 to 3200 forms?</p> <p>23 A. Yes, sir.</p> <p>24 Q. So over a four-year span, you can expect</p>	<p style="text-align: right;">Page 32</p> <p>1 firearm that has been brought in for transfer, sale,</p> <p>2 or gunsmith work since we've opened for business.</p> <p>3 Q. Do those records specifically state whether</p> <p>4 each such firearm is a firearm of the type regulated</p> <p>5 by PICA?</p> <p>6 A. Those records state make, model, caliber,</p> <p>7 serial number, and type.</p> <p>8 Q. One could, by reviewing each of those</p> <p>9 weapons, determine whether it is a firearm of the</p> <p>10 type regulated by PICA; is that fair to say?</p> <p>11 A. Yes.</p> <p>12 MR. BRADY: Objection, calls for specu-</p> <p>13 lation.</p> <p>14 BY MR. HAZINSKI:</p> <p>15 Q. The data is not stored in a format that</p> <p>16 allows you to immediately determine, in summary form,</p> <p>17 what proportion of the firearms are firearms of the</p> <p>18 type regulated by PICA, correct?</p> <p>19 A. Correct.</p> <p>20 MR. HAZINSKI: I'm going to show you</p> <p>21 another exhibit now. I believe we're up to Exhibit</p> <p>22 5.</p> <p>23 (Exhibit 5 marked.)</p> <p>24 BY MR. HAZINSKI:</p>
<p style="text-align: right;">Page 31</p> <p>1 there to be at least a thousand forms, right?</p> <p>2 I'm sorry; scratch that.</p> <p>3 Over a four-year period, you would expect</p> <p>4 there to be at least 10,000 forms, correct?</p> <p>5 A. Yes.</p> <p>6 Q. Did you review all of those forms when you</p> <p>7 were generating the 20-40% estimate?</p> <p>8 A. I've reviewed each and every one of those</p> <p>9 forms after their completion.</p> <p>10 Q. Did you examine -- in preparing your</p> <p>11 answers to Interrogatory No. 5, did you examine those</p> <p>12 records to count the proportion of those firearms</p> <p>13 that were firearms of the type regulated by PICA?</p> <p>14 A. I did not go back and count every single</p> <p>15 form; however, through my experience in completing</p> <p>16 those forms is what I used to generate that number.</p> <p>17 Q. Would it be fair to say that you were</p> <p>18 estimating it based on your memory of having filled</p> <p>19 out that documentation in the past?</p> <p>20 A. Yes.</p> <p>21 Q. But Piasa does not keep a comprehensive</p> <p>22 list of every firearm that is sold that is a firearm</p> <p>23 of the type regulated by PICA, does it?</p> <p>24 A. We keep a comprehensive list of every</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. Mr. Pulaski, are you able to see this</p> <p>2 document?</p> <p>3 A. I am.</p> <p>4 Q. Do you recognize it?</p> <p>5 A. It looks like a supplemental response to</p> <p>6 the interrogatories, yes.</p> <p>7 Q. Have you seen this before?</p> <p>8 A. I can't recall if I've seen this particular</p> <p>9 document before.</p> <p>10 Q. I'll scroll down to page 9.</p> <p>11 This is a Verification form, correct?</p> <p>12 A. Yes.</p> <p>13 Q. This Verification states under oath that to</p> <p>14 the best of your knowledge, the foregoing answers are</p> <p>15 true and correct; is that right?</p> <p>16 A. Yes.</p> <p>17 Q. Did you sign this?</p> <p>18 A. I did.</p> <p>19 Q. Before you signed this Verification, did</p> <p>20 you review all of the supplemental interrogatory</p> <p>21 responses to make sure that they were correct?</p> <p>22 A. I reviewed the prior supplemental document</p> <p>23 that you provided, I think Exhibit 3, and any -- any</p> <p>24 relevant changes that were made to this one, but I</p>

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1 did not notice any.

2 Q. Okay. Fair to say that you -- you separ-

3 ately reviewed the initial interrogatory responses,

4 but did not separately review all of the supplemental

5 responses; is that right?

6 MR. BRADY: Objection, misstates testi-

7 mony.

8 MR. HAZINSKI: You can answer.

9 THE WITNESS: I reviewed both documents,

10 this one, as well.

11 BY MR. HAZINSKI:

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

13 Just to be clear, because I think the

14 testimony is not yet clear -- have you seen this

15 document before?

16 A. Like I said before, I -- I don't recall

17 each specific document.

18 This one, I have seen before, but I have

19 seen many documents in relation to this case. Not

20 being an attorney, they don't stand out as -- as

21 separate from each other every time.

22 Q. Well, let's focus specifically on the

23 amended -- or I should say supplemental response to

24 Interrogatory No. 2.

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1 Are you able to see that on the screen?

2 A. I am.

3 Q. This is an interrogatory asking to identify

4 each item regulated by PICA for which you contend the

5 Act's regulations violated the Second Amendment, and

6 I'll scroll down to page 4 of this document.

7 Do you see that the response identifies

8 in lettered paragraphs, certain categories of

9 firearms?

10 A. I do.

11 Q. Do you recall reviewing this answer?

12 A. I do.

13 Q. Did you review this answer before you

14 signed the Verification on page 9?

15 A. I did.

16 Q. Okay. So this response identifies 11

17 categories of items for which you contend that PICA's

18 regulations violate the Second Amendment, correct?

19 A. Yes.

20 Q. Each category, as I mentioned, corresponds

21 to a letter a through k, right?

22 A. Yes.

23 Q. So I'd like to ask you about each of these

24 categories, and how they figure into Piasa's

Page 36

1 business.

2 Starting with a, which is semiautomatic

3 rifles that accept detachable magazines and have at

4 least one of the listed features, about how many

5 firearms in that category would you estimate Piasa

6 Armory has sold since 2020?

7 A. I would estimate, oh, several hundred each

8 year. Between sales and transfers, somewhere in the

9 500 to 800 firearm range each year.

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

11 A. I said each year we sell or transfer some-

12 where around 4,000 firearms, so that divided equally

13 between the months -- sorry, I need a calculator to

14 do that math.

15 Q. Just to clarify, when you said "4,000

16 firearms," that's 4,000 total firearms, not limited

17 to firearms in this category we're talking about,

18 right?

19 A. Correct.

20 Q. Okay. Focusing specifically on the semi-

21 automatic rifles that accept detachable magazines and

22 have at least one of these listed features, based on

23 your estimate, would you say that Piasa typically

24 transfers more or less than 100 such firearms per

Page 37

1 month?

2 A. I would estimate over 100 per month.

3 Q. Subparagraph b in the interrogatory re-

4 sponse refers to SKS rifles with a detachable

5 magazine. Do you see that?

6 A. I do.

7 Q. What is an SKS rifle?

8 A. It is a Russian small arm.

9 Q. How many SKS rifles with detachable maga-

10 zines would you estimate Piasa has sold since 2020?

11 A. I would have to review specific records for

12 that, but very few.

13 Q. About how many is very few?

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

15 range.

16 Q. Subparagraph c refers to semiautomatic

17 rifles with a fixed magazine above ten rounds. Do

18 you see that?

19 A. I do.

20 Q. How many such firearms would you estimate

21 Piasa has sold since 2020?

22 A. I could not put an estimate to that. Those

23 firearms don't have as much of a desire in this

24 state, due to no regulation on magazine capacity,

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1 like they would in other states.
 2 Q. Can you explain that answer for me?
 3 A. Some states have a restriction on the
 4 number of rounds allowed in the magazine on a firearm
 5 and require it to be a fixed capacity.
 6 Illinois, before PICA, did not have that
 7 restriction.
 8 Q. Since 2020, would you estimate that Piasa
 9 has sold fewer than ten semiautomatic rifles with a
 10 magazine above -- a fixed magazine above ten rounds?
 11 A. I couldn't put an honest estimate on it.
 12 Q. Based on your experience, would you
 13 estimate that it's more or less than the number of
 14 SKS rifles with detachable magazines that Piasa sold?
 15 A. I presume it was less.
 16 Q. D refers to semiautomatic pistols that
 17 accept detachable magazines and have at least one of
 18 the listed features.
 19 I'll ask the same question again, and I
 20 apologize if it's getting tedious: About how many
 21 semiautomatic pistols with detachable magazines that
 22 have one or more of those features would you estimate
 23 Piasa has sold since 2020?
 24 A. Again, I would lump that number in with the

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1 earlier number of approximately 20%, 20-40% of our
 2 firearm transfers and sales.
 3 Q. As an absolute number, how many would that
 4 be?
 5 A. Somewhere between 600 to 800 a year.
 6 Q. Would you estimate that Piasa annually
 7 sells more of the firearms in the category reflected
 8 in paragraph d than rifles in the category of fire-
 9 arms in paragraph a?
 10 A. I would presume a fairly even split between
 11 paragraphs a and d.
 12 Q. Subparagraph e refers to semiautomatic
 13 pistols with a fixed magazine above 15 rounds.
 14 How many such firearms would you estimate
 15 Piasa has sold since 2020?
 16 A. Of category e, I don't have a recollection
 17 of any firearms since 2020.
 18 Q. Subparagraph f refers to semiautomatic
 19 shotguns that have one of five -- at least one of
 20 five listed features.
 21 How many firearms in this category would
 22 you estimate Piasa has sold since 2020?
 23 A. I would estimate 20 to 50 per year.
 24 Q. Paragraph g refers to semiautomatic shot-

Page 40

1 guns with a fixed magazine above five rounds.
 2 About how many such firearms would you
 3 estimate Piasa has sold since 2020?
 4 A. Similar with the above, 20 to 50 per year.
 5 Q. Are the -- so about 20 to 50 firearms in
 6 the category of subparagraph f, and 20 to 50 in
 7 category subparagraph g -- are those overlapping to
 8 any extent?
 9 A. They do, yes.
 10 Q. Do they overlap entirely?
 11 A. Not entirely, no.
 12 Q. About how much overlap would you estimate
 13 there is?
 14 A. I would say somewhere around 70% of that
 15 number is an overlap.
 16 Q. Thank you.
 17 Subparagraphs h and i refer to rifles
 18 chambered for .50 BMG ammunition and .50 BMG ammu-
 19 nition. Do you see that?
 20 A. I do.
 21 Q. How many rifles chambered for 50 caliber
 22 BMG ammunition would you estimate Piasa has sold
 23 since 2020?
 24 A. I'd have to review our data for that, but I

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1 believe we sell or transfer one every year to every
 2 other year.
 3 Q. Can you estimate how much 50 caliber BMG
 4 ammunition Piasa has sold since 2020?
 5 A. We tend to sell approximately a box of six
 6 to eight months, a box of ten rounds.
 7 Q. Fair to say, it's not a big part of Piasa's
 8 business?
 9 A. We have a unique situation where we are
 10 located with not a suitable shooting range for that
 11 type of ammunition.
 12 Q. Can you explain what you mean by that?
 13 A. Yes. 50 caliber ammunition is not normally
 14 used on pistol length ranges of 15 to 25 yards. We
 15 don't have any ranges that are publicly accessible
 16 that are longer than that in the immediate area of
 17 Illinois.
 18 Q. Why is 50 caliber ammunition not used on
 19 ranges of that size?
 20 A. It's expensive, and usually used for longer
 21 range target practice.
 22 Q. So the use case for 50 caliber ammunition
 23 is different enough from the use case for most pistol
 24 ammunition that aren't used on the same shooting

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1 ranges?
 2 MR. BRADY: Objection, misstates testi-
 3 mony, and vague as to -- I'm sorry, Mr. Hazinski, I
 4 didn't understand the term you were using, the use
 5 case.
 6 MR. HAZINSKI: Yeah, Mr. Pulaski, do you
 7 understand what I mean when I say use case?
 8 THE WITNESS: I don't.
 9 Can you clarify?
 10 MR. HAZINSKI: Yeah. Let me ask it
 11 another way.
 12 The 50 caliber ammunition is better
 13 suited for long-range shooting than for the shooting
 14 that is typically done with common pistol ammunition,
 15 and that's why they use different shooting ranges
 16 typically; is that -- is that a fair summary of your
 17 testimony?
 18 THE WITNESS: That's a fair summary.
 19 BY MR. HAZINSKI:
 20 Q. Subparagraph j is semiautomatic firearms
 21 that have the capacity to accept a belt ammunition
 22 feeding device. Do you see that?
 23 A. I do.
 24 Q. What is a belt ammunition feeding device?

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1 A. A belt ammunition feeding device is either
 2 a cloth or metal belt or a series of links that
 3 attach ammunition to each other that are fed in
 4 through a firearm.
 5 Q. Approximately how many semiautomatic rifles
 6 are cable -- Scratch that.
 7 Approximately how many semiautomatic
 8 firearms that have the capacity to accept a belt
 9 ammunition feeding device would you estimate Piasa
 10 has sold since 2020?
 11 A. I believe we've transferred ownership of
 12 two of those.
 13 Q. Is it fair to say that such firearms are
 14 not a major part of Piasa's business?
 15 A. Assisting with transfer is a major part of
 16 our business, and whichever customer would like to
 17 make that happen, then that's what we do, but they
 18 aren't a major revenue generator for our business.
 19 Q. Subparagraph k refers to a list of firearm
 20 parts that may bring a firearm into PICA's definition
 21 of an assault weapon, correct?
 22 A. Correct.
 23 Q. Can you estimate about how many of these
 24 firearms Piasa has sold since 2020?

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1 A. I would not be able to estimate that
 2 without reviewing our data.
 3 Q. Which data would you need to review?
 4 A. Our sales records from our point of sale.
 5 We do normally keep those items in stock
 6 for sale, however.
 7 Q. What -- what would be required to count
 8 the number of items of the type listed in subpara-
 9 graph k that Piasa has sold or transferred since
 10 2020?
 11 A. We would need to pull reports from our
 12 point of sale systems.
 13 Q. Can you explain what those reports are?
 14 A. Sure. That would be individual reports of
 15 each item sold for a given period of time.
 16 Q. Are they similar to sales receipts?
 17 A. Yes, but they would be lumped into a
 18 category.
 19 Q. The last paragraph of this interrogatory
 20 response states "Responding Party does not challenge
 21 PICA's restrictions as to grenade launchers or
 22 shotguns with a revolving cylinder that do not meet
 23 an exemption under PICA's definition of assault
 24 weapon." Do you see that?

Page 45

1 A. I do.
 2 Q. In what way do grenade launchers differ
 3 from the items that Piasa contends are protected by
 4 the Second Amendment?
 5 MR. BRADY: Objection, vague. Objection
 6 to the extent it calls for a legal conclusion.
 7 MR. HAZINSKI: Yeah, let me rephrase it.
 8 In what respects do grenade launchers
 9 differ from the categories of items listed in sub-
 10 paragraphs a through k of this interrogatory re-
 11 sponse?
 12 MR. BRADY: Objection, vague as to
 13 differ.
 14 To the extent it's calling for a legal
 15 conclusion, objection.
 16 MR. HAZINSKI: You can answer.
 17 THE WITNESS: I mean, a grenade launcher
 18 is not a traditional firearm that is purchased by our
 19 customers.
 20 BY MR. HAZINSKI:
 21 Q. What do you mean when you say "a tradi-
 22 tional firearm"?
 23 A. Typically a traditional firearm would be a
 24 pistol, rifle, or shotgun. These are also much more

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1 highly regulated by the Federal Government, and many
 2 of -- many customers are under the belief that they
 3 were not legally allowed in Illinois, to begin with,
 4 and don't tend to seek that item because of that.
 5 Q. What difference -- Strike that.
 6 What differentiates a shotgun with a
 7 revolving cylinder from other types of shotguns?
 8 A. The revolving cylinder.
 9 Q. Can you explain what that means?
 10 A. Typically the revolving cylinder is a
 11 built-in magazine that rotates and feeds higher
 12 capacity than a typical shotgun.
 13 Q. In what ways are revolving cylinder shot-
 14 guns different from the items listed in subparagraphs
 15 a through k of this interrogatory response?
 16 MR. BRADY: Objection, vague as to dif-
 17 ferent, and objection to the extent it calls for a
 18 legal conclusion.
 19 THE WITNESS: Revolving cylinder shotgun
 20 has regulation through the ATF as an item that must
 21 be covered under the NFA.
 22 BY MR. HAZINSKI:
 23 Q. I want to go down to supplemental response
 24 to Interrogatory No. 7, which is on page 7 of Exhibit

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1 5. This is an interrogatory that asks that you
 2 describe with specificity all ways in which you
 3 contend you have been injured or will be injured by
 4 the enactment and/or enforcement of PICA. Do you see
 5 that?
 6 A. I do.
 7 Q. I'd like to ask you about one part of the
 8 response; I can highlight it.
 9 Starting here, "Prior to PICA taking
 10 effect, Responding Party had sold items falling
 11 within most, if not all, of those firearm,
 12 ammunition, and part categories." Do you see that?
 13 A. Yes.
 14 Q. It refers partly to the supplemental
 15 response to Interrogatory No. 3, correct?
 16 A. Yes.
 17 Q. Your answer states that Piasa may not have
 18 sold items in all of those categories, right?
 19 A. Correct.
 20 Q. We just walked through them, but which
 21 categories would that refer to?
 22 A. Without reviewing individual categories
 23 again, from immediate recollection, it's revolving
 24 cylinder shotguns.

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1 Q. Would it include semiautomatic pistols with
 2 fixed magazines above 15 rounds?
 3 A. Yes.
 4 Q. Piasa has, for example, transferred a
 5 grenade launcher within the past five years, right?
 6 A. I would need to refer to our records to
 7 see when; but, yes, we have transferred a grenade
 8 launcher.
 9 Q. Okay. Later on in the answer it states,
 10 "Some of those items are among the most popular
 11 firearms and parts in the country." Do you see that?
 12 A. Yes.
 13 Q. Which items are you referring to that are
 14 the most popular firearms and parts in the country?
 15 A. Items such as AR-15s, AK-47s, pistols with
 16 threaded barrels, copies in variance of each of
 17 those.
 18 Q. Other than AR-15, AK-47s, and pistols with
 19 threaded barrels, and copies in variance of those
 20 items, are there other items included in your
 21 reference to most popular firearms and parts in the
 22 country?
 23 A. Certainly many firearms in those categories
 24 would be covered under that.

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1 Q. Any firearms not in those categories?
 2 A. I would have to look at an exhaustive list
 3 of all the firearms that are popular in the country.
 4 Q. Are 50 caliber rifles among the most
 5 popular firearms in the country?
 6 A. They are not as common as other items on
 7 the list, but they are a popular item.
 8 Q. Does the phrase, most popular firearms and
 9 parts in the country, as used in this interrogatory
 10 response, include centerfire 50 caliber rifles?
 11 A. No.
 12 Q. Does that phrase, as used in this inter-
 13 rogatory response, include semiautomatic firearms
 14 that are capable of accepting a belt ammunition
 15 feeding device?
 16 A. No.
 17 Q. What information did you rely on to deter-
 18 mine which are the most popular firearms and parts in
 19 the country, in preparing this interrogatory
 20 response?
 21 A. Both our -- our sales data, our transfer
 22 and sales information, along with information from
 23 our national trade organization, the NSSF, National
 24 Shooting Sports Foundation.

<p style="text-align: right;">Page 50</p> <p>1 Q. Did you specifically review any Piasa sales 2 documents or transfer documents in determining which 3 items are among the most popular, to prepare this 4 interrogatory response? 5 A. Again, my knowledge of those documents from 6 completing paperwork with our company gives me that 7 background knowledge. 8 Q. Fair to say, you didn't specifically look 9 at those documents again, or analyze them again, in 10 order to arrive at this conclusion, correct? 11 A. Correct. 12 Q. Further down, do you see where it says "The 13 inability to offer those items to its customers, 14 due to PICA, has caused Responding Party to lose a 15 significant amount of revenue"? Did I read that 16 correctly? 17 A. Yes. 18 Q. How much revenue do you contend Piasa has 19 lost due to PICA? 20 A. It would be difficult for me to prove a 21 negative; however, again, we estimate 20-40%, and 22 unknown additional, because of customers who are 23 afraid to use our other services due to PICA. 24 Q. What documents support your conclusion that</p>	<p style="text-align: right;">Page 52</p> <p>1 A. We did not. 2 Q. You gave a deposition in the Langley case, 3 which is one of the consolidated cases in the 4 Southern District, correct? 5 A. Correct. 6 Q. That was in October of 2020? 7 A. I don't recall the specific date or time, 8 but that sounds about -- You said 2020? 9 Q. I'm sorry. That's what I have written in 10 my notes, but that's clearly incorrect. 11 I believe it was in October of 2023. 12 A. That's closer to what I recall. 13 Q. Thank you for catching that. 14 Do you recall testifying that you esti- 15 mated that PICA had caused Piasa to lose about 50% of 16 its revenue? 17 A. I don't recall that number, no. 18 MR. HAZINSKI: Okay. I'll show you what 19 I think will now be Exhibit 6. We'll mark this as 20 Exhibit 6. 21 (Exhibit 6 marked.) 22 BY MR. HAZINSKI: 23 Q. Mr. Pulaski, are you able to see this 24 deposition?</p>
<p style="text-align: right;">Page 51</p> <p>1 Piasa lost 20-40% of its revenue? 2 MR. BRADY: Objection, misstates testi- 3 mony. 4 MR. HAZINSKI: You can answer. 5 THE WITNESS: Again, we don't have an 6 ability to prove a negative. 7 BY MR. HAZINSKI: 8 Q. Are there any documents that you can point 9 to that would show that Piasa had lost 20-40% of its 10 business? 11 MR. BRADY: Objection, misstates testi- 12 mony. 13 MR. HAZINSKI: You can answer. 14 THE WITNESS: Okay. Again, it's -- it's 15 impossible to prove a negative, but I can say that 16 we have many customers who would like to purchase, or 17 who have purchased and transferred, but are unable to 18 receive those items, along with customers who are 19 unwilling to bring already owned items in for either 20 service or use through our facility. 21 BY MR. HAZINSKI: 22 Q. After PICA went into effect, did Piasa 23 conduct any audit or financial analysis to determine 24 the specific dollar amount of any lost revenue?</p>	<p style="text-align: right;">Page 53</p> <p>1 A. The lettering is a little small, but, yes. 2 Q. I'll zoom in a bit. Hopefully that will 3 help. 4 Do you recognize this as the -- the 5 transcript of deposition you gave in October of last 6 year? 7 A. I'm not familiar with deposition tran- 8 scripts, but I'll presume that that's what it is. 9 Q. Fair enough. 10 I'll show you -- on this transcript it's 11 page 18, starting at line 7. 12 Do you see where it says "What financial 13 impact has PICA had on your business at Piasa 14 Armory?" Do you see that? 15 A. Yes. 16 Q. You answered, "We estimate approximately 50 17 percent loss of revenue," correct? 18 A. Yes -- 19 Q. Did you give that answer -- 20 A. -- correct. 21 Q. Did you give that answer at that time? 22 A. That's my testimony. 23 Q. Do you believe that estimate is accurate, 24 as you sit here today?</p>

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1 A. No. We revise our estimates of our
 2 business operations on an ongoing basis.
 3 Q. At that -- at the time you gave this
 4 testimony, what led you to believe that you -- that
 5 Piasa was experiencing a 50% loss of revenue?
 6 A. It was based on our experience with our
 7 customers and our sales.
 8 Q. Your testimony today is that the loss of
 9 revenue might actually be closer to 20%; is that
 10 fair?
 11 A. Correct.
 12 MR. BRADY: Objection, misstates testi-
 13 mony.
 14 MR. HAZINSKI: All right. I realize
 15 we've been going for about an hour and 15 minutes.
 16 If the witness or anybody else would like to take a
 17 break, we could break for maybe five minutes and come
 18 back at 11:20.
 19 THE COURT REPORTER: Thank you.
 20 MR. HAZINSKI: All right. See you soon.
 21 (Recess taken.)
 22 MR. HAZINSKI: Mr. Pulaski, I'm going to
 23 show you another document, and I believe will be
 24 Exhibit 7.

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1 (Exhibit 7 marked.)
 2 BY MR. HAZINSKI:
 3 Q. Mr. Pulaski, do you see this document
 4 called ATF Bound Book?
 5 A. I do.
 6 Q. For the record, this is a document produced
 7 with a Bates stamps Piasa 466 through 1706.
 8 Do you recognize this document?
 9 A. Yes.
 10 Q. What is it?
 11 A. This is our ATF required recordkeeping
 12 called the Bound Book.
 13 Q. This document contains -- the Bound Book
 14 contains records of all of Piasa's firearm acquisi-
 15 tions and dispositions, correct?
 16 A. Correct.
 17 Q. Can you define the term acquisition, for
 18 purposes of this document?
 19 A. Yes. Acquisition means taking into inven-
 20 tory for transfer, gunsmith work, or other holding,
 21 for gunsmith work. It would be periods overnight.
 22 For transfers or other holding, it would
 23 be any acquisition.
 24 Q. Can you define disposition, for the

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1 purposes of this document?
 2 A. Yes. Disposition would be returning a -- a
 3 firearm to the original owner or transfer to other
 4 licensed individual or to an unlicensed individual.
 5 Q. When you say "returning to the original
 6 owner," does that refer specifically to the context
 7 of gunsmithing services?
 8 A. Yes.
 9 Q. I'll scroll down to the second page so we
 10 can see the data; and this is Piasa 467.
 11 Does each row in this list correspond to
 12 one firearm or to one transaction?
 13 A. Each row is one firearm.
 14 Q. Okay. And these records are organized
 15 chronologically by the date of acquisition, correct?
 16 A. Correct.
 17 Q. These records generally start in January
 18 2021 and go through April -- midway through April of
 19 2024, correct?
 20 A. Correct.
 21 Q. You referred to the ATF earlier.
 22 Is Piasa legally required to maintain
 23 these records?
 24 A. We are.

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1 Q. Is documenting firearm acquisitions and
 2 dispositions a regular part of Piasa's business
 3 practice?
 4 A. Yes.
 5 Q. Where are these records maintained?
 6 A. These records are maintained -- this
 7 particular set of records is maintained digitally via
 8 a company called FastBound, you see referenced on the
 9 bottom of that page. They store those in the Cloud
 10 with their -- their servers, and then we also back
 11 those up locally.
 12 Q. When did Piasa start using FastBound?
 13 A. It looks like in -- we began evaluating in
 14 2023, but began earnest use in 2021 -- I'm sorry,
 15 excuse me.
 16 End of 2020, we began evaluating, and
 17 January of 2021 we began using.
 18 Q. I see.
 19 Does this document contain all of the
 20 Piasa acquisition and disposition records that exist
 21 in FastBound, at least up to the point that they were
 22 produced to us?
 23 A. Yes.
 24 Q. Did you generate this document using the

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1 FastBound platform?
 2 A. Yes.
 3 Q. Just to clarify, you printed all of the
 4 acquisition and disposition records that existed in
 5 FastBound, rather than filtering them or using any
 6 criteria to narrow the data, right?
 7 A. Correct, not printed by provided electron-
 8 ically.
 9 Q. I use printed a little loosely there.
 10 I suppose I meant printed to PDF, or
 11 something like that, but thank you for the
 12 clarification.
 13 The first entry here has an acquisition
 14 date, it looks like of October 2020, correct?
 15 A. Yes.
 16 Q. It has your name listed, Eric Scott
 17 Pulaski, in the column name and address of non-
 18 licensee, correct?
 19 A. Correct.
 20 Q. Was this from the period of time where you
 21 were testing out the system and beginning to
 22 implement it?
 23 A. Yes.
 24 Q. Okay. So the fact that your name is listed

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1 under name and address of nonlicensee with respect to
 2 that first entry, what does that mean?
 3 A. That means that that firearm was personally
 4 owned by me.
 5 Because we are an LLC, not a sole
 6 proprietor, the business owns any firearms owned by
 7 the business, and I own personally firearms by
 8 myself.
 9 Q. Does this row reflect that you transferred
 10 a firearm from your personal possession into the
 11 possession of the business?
 12 A. Correct.
 13 Q. Okay. So is it fair to say that the
 14 information in the column labeled Name and address of
 15 nonlicensee; or if licensee, name and license No. (If
 16 acquired), the information in that column essentially
 17 says where the firearm came from?
 18 A. Correct.
 19 Q. Who enters acquisition and disposition data
 20 into FastBound?
 21 A. That data is entered by myself and our
 22 sales staff.
 23 Q. Is the data entered into FastBound by Piasa
 24 employees that have knowledge, personally, of each

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1 acquisition and disposition?
 2 A. Yes.
 3 Q. How long after each firearm acquisition
 4 does Piasa wait to enter that information?
 5 A. That information is entered immediately
 6 into the FastBound system.
 7 Q. How long after each firearm disposition
 8 does Piasa wait to enter the information into
 9 FastBound?
 10 A. Firearms are disposed when the 4473 Form
 11 is completed or compliant with the State regulations,
 12 which I believe is 24 hours.
 13 Q. So are you saying that the disposition
 14 information is entered into FastBound typically
 15 within 24 hours after each disposition?
 16 A. Correct.
 17 Q. The first column in the Bound Book is
 18 labeled Importer, manufacturer, and/or "privately
 19 made firearm." Do you see that?
 20 A. Yes.
 21 Q. What type of information gets logged into
 22 this column?
 23 A. The information about who made or -- and/or
 24 imported those firearms.

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1 Q. The second column is called Type. Do you
 2 see that?
 3 A. Yes.
 4 Q. What type of information is logged in the
 5 Type column?
 6 A. Those would be the type defined by the ATF.
 7 Q. The types listed in this document are
 8 rifle, pistol, revolver, shotgun, receiver, and
 9 frame; is that correct?
 10 A. We also have other and pistol grip --
 11 excuse me, pistol grip firearm, and compliant with
 12 Illinois rules, black powder.
 13 Q. I'd like to ask you about some of those
 14 terms.
 15 Can you -- can you explain what a
 16 receiver is?
 17 A. The receiver is the part of the firearm
 18 that would hold many of the functional components,
 19 most commonly the AR-15 lower receiver.
 20 Q. What types of firearms have receivers?
 21 A. Every firearm has a receiver. That's what
 22 holds the action components that make the firearm
 23 function.
 24 Q. Fair to say that the firearm listed as a

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1 receiver is not necessarily an AR platform rifle, for
 2 example?
 3 A. Correct.
 4 Q. What is a frame?
 5 A. A frame is similar to a receiver, but
 6 typically refers to pistol specific firearms.
 7 Q. So are you saying that a receiver
 8 generally -- Strike that.
 9 Are you saying that the term frame, in
 10 the Type column in the Bound Book, generally refers
 11 to pistols, whereas the term receiver generally
 12 refers to other types of firearms?
 13 A. Typically, yes.
 14 Q. Okay. Does the Bound Book contain listings
 15 for any -- Strike that.
 16 Is it ever the case that a pistol is
 17 referred to in the Bound Book with the type listed as
 18 receiver?
 19 A. It's possible, but not common.
 20 Q. If the type is listed as receiver, does
 21 that necessarily mean that the firearm is a rifle?
 22 A. Again, just like with the pistols, it's
 23 typically referring to a rifle or a shotgun, but that
 24 depends on how the ATF or the manufacturer classifies

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1 it.
 2 Q. It's possible that a firearm listed as --
 3 Strike that.
 4 The third column is called Model. Do you
 5 see that?
 6 A. I do.
 7 Q. What information is logged in that column?
 8 A. That's the information provided by the
 9 manufacturer; or if none is provided by the manufac-
 10 turer, our best knowledge of what that firearm's
 11 model name is.
 12 Q. The fourth column is Caliber or gauge,
 13 correct?
 14 A. Correct.
 15 Q. What information is logged in that column?
 16 A. That's the caliber or gauge, if known, for
 17 rifles, shotguns, pistols, frames, all the -- all the
 18 types, either as indicated by the manufacturer or by
 19 the capabilities of the firearm.
 20 Q. That refers to the caliber or gauge of the
 21 projectile that the listed firearm is capable of
 22 shooting, correct?
 23 A. Typically, yes.
 24 Q. Why do you say typically?

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1 A. There are times when that caliber gauge is
 2 not known, or when they're capable of using multiple
 3 calibers or gauges.
 4 Specifically that third line down, the
 5 Ruger SP101, is listed as .357 Magnum, but it's
 6 capable of also shooting another caliber.
 7 Q. What other caliber can it shoot?
 8 A. That one is three .38 Special.
 9 Q. Okay. Can you explain what the term multi
 10 in this column refers to?
 11 A. Yes. Those last two entries, the Anderson
 12 and ABC Rifle Companies, those are specifically AR-15
 13 style receivers, and because they don't have any
 14 functional parts or any labeling by the manufacturer
 15 for what caliber they're intended for, they can be
 16 built into any of several dozen different calibers.
 17 Q. Are all of the firearms with a caliber or
 18 gauge listed as multi AR-15 style receivers?
 19 A. No.
 20 Q. What other kinds of firearms or receivers
 21 can have a caliber or gauge listed as multi?
 22 A. Frames or other receivers for other
 23 firearms, most commonly Glock style copies and
 24 clones, are commonly listed as multi.

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1 Q. I want to ask you another terminology
 2 question.
 3 I'll scroll now to page Piasa 713, is
 4 what I'm looking for.
 5 Do you see the fifth row of this page, it
 6 identifies a rifle and the caliber and gauge is
 7 listed as 50BMG?
 8 A. Yes.
 9 Q. What does 50BMG refer to?
 10 A. That's 50 caliber BMG.
 11 Q. Does Piasa use any abbreviations in its
 12 Bound Book other than 50BMG to identify firearms
 13 capable of shooting 50 caliber cartridges?
 14 A. Yes. We use the standard abbreviations for
 15 the industry for any other 50 caliber or similar
 16 ammunition. Just like above is 12GA, it's an
 17 abbreviation for gauge.
 18 Q. Well, maybe my question was unclear.
 19 So the 50BMG entry in the Caliber or
 20 gauge column identifies that entry as a 50 caliber
 21 rifle, correct?
 22 A. As that particular chambering of a 50
 23 caliber rifle, yes.
 24 Q. Are there any other abbreviations for 50BMG

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1 that Piasa uses to identify 50 caliber rifles in
 2 these records?
 3 MR. BRADY: Objection, vague as to 50
 4 caliber rifles.
 5 MR. HAZINSKI: Do you understand what I'm
 6 asking?
 7 THE WITNESS: I presume you mean the
 8 50BMG cartridge?
 9 MR. HAZINSKI: Right.
 10 THE WITNESS: 50 caliber rifles can
 11 encompass many other cartridges.
 12 BY MR. HAZINSKI:
 13 Q. If Piasa acquires or disposes of a rifle
 14 that is chambered for 50 caliber BMG ammunition, is
 15 it always indicated in the Bound Book, the term
 16 50BMG?
 17 A. Our Bound Book allows us to enter different
 18 caliber names or new caliber names that aren't in-
 19 cluded with the software originally, so every entry
 20 will have -- that refers to 50 caliber BMG will have
 21 some variation of that entry that you see on the
 22 McMillan rifle line. It may include a period at the
 23 beginning, it may have a space between 50 and BMG, or
 24 it may have periods in between each letter of BMG,

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1 but some variation of 5-0 and BMG would be included,
 2 yes.
 3 Q. Understood. Thank you.
 4 I'll go back to the second page of this
 5 document, and just ask about the seventh column,
 6 which says Date of import, manufacturer, or
 7 acquisition. Do you see that?
 8 A. I do.
 9 Q. So does this refer to the date on which
 10 Piasa took the listed firearm in its inventory?
 11 A. Yes.
 12 Q. Okay. The ninth column says Date of
 13 disposition.
 14 Does this refer to the date on which the
 15 firearm was returned or sold or transferred?
 16 A. It refers to the date that it was returned
 17 to the owner or transferred to the owner.
 18 Date of sale can be different from date
 19 of disposition.
 20 Q. I see.
 21 So you might have a date of sale that's
 22 earlier, and then an actual date of transfer several
 23 days or weeks later, and the date of transfer is what
 24 would be reflected in that column, correct?

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1 A. Correct.
 2 Q. The tenth column on this sheet is called
 3 Name.
 4 What type of information is logged in
 5 this column?
 6 A. That would typically have the name of the
 7 nonlicensee or licensee acquiring that firearm.
 8 Q. Could the Name category include both
 9 individuals and organizations?
 10 A. Yes.
 11 Q. Okay. Would the data in the Name column
 12 enable you to tell how many firearms Piasa had
 13 returned or transferred to a particular individual
 14 or organization?
 15 A. Yes.
 16 Q. Do the acquisition and disposition records
 17 distinguish in any way between firearms that were
 18 transferred versus ones which were acquired for
 19 gunsmithing services?
 20 A. This version of our Bound Books does not;
 21 however, the records kept by FastBound do.
 22 Q. Is it possible for Piasa to generate a
 23 version of these records that indicates whether each
 24 firearm was acquired for gunsmithing services?

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1 A. Yes, that's possible.
 2 Q. Looking at this version of the document,
 3 there's no way to tell, for any given firearm,
 4 whether there was a transfer to a new owner, correct?
 5 A. Someone not familiar with the business
 6 would have no way to know --
 7 Q. Do you --
 8 A. -- other than -- pardon me -- other than
 9 the acquisition name.
 10 For example, we typically don't receive
 11 firearms from companies for gunsmith work; those are
 12 typically transfers.
 13 Q. Understood.
 14 The last column on this sheet is called
 15 Notes. Do you see that?
 16 A. Yes.
 17 Q. What type of information is recorded in
 18 that column?
 19 A. That's a column required by ATF for any
 20 errors or additions or amendments to any of those
 21 line entries.
 22 Q. Can you give me an example?
 23 A. If the serial number was incorrectly
 24 recorded, then we can change that serial number in

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1 our permanent record books; however, we must keep
 2 track of -- excuse me, an audit trail of every change
 3 made.
 4 Q. Does Piasa enter any information into the
 5 Notes column other than records of when it corrected
 6 errors in the data?
 7 A. No.
 8 Q. So, for example, the Notes column does not
 9 contain any information about Piasa's relationship
 10 with the customer, for example?
 11 A. Not to my knowledge. FastBound does not
 12 include that information in the Notes column.
 13 Q. The Notes information, is that entered and
 14 typed out manually by Piasa employees who are
 15 responsible for updating the acquisition and dispo-
 16 sition information?
 17 A. Not to my knowledge. That's automatically
 18 generated by FastBound.
 19 Q. Understood.
 20 So there's not -- there's not a narrative
 21 box that you have access to; rather, this is automa-
 22 tically generated information through the software
 23 whenever changes are made to the preexisting data; is
 24 that a fair summary?

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1 A. To the best of my knowledge, yes.
 2 Q. Okay. Do you know how many firearms are
 3 listed in the records here in Exhibit 7?
 4 A. In the FastBound records, we have approxi-
 5 mately 14,000 firearms listed.
 6 Q. Can you estimate what proportion of those
 7 records are records gunsmithing services?
 8 A. Not without reviewing additional data.
 9 Q. Would you estimate it's more or less than
 10 half?
 11 A. Less than half.
 12 Q. Would you be comfortable estimating whether
 13 it's more or less than 10%?
 14 A. I would roughly estimate approximately 300
 15 firearms a year for gunsmithing service.
 16 Q. Over a four-year time period, that might be
 17 about 1,200 firearms for your estimate?
 18 A. That's possible.
 19 Q. Do you know how many of the firearms listed
 20 in these records are firearms of the type regulated
 21 by PICA?
 22 A. Excuse me. Are you asking if I can tell by
 23 simply looking at these records, which are regulated
 24 by PICA?

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1 Q. Well, as you sit here today, are you able
 2 to determine that, just without consulting any addi-
 3 tional information?
 4 A. Not a comprehensive number. We couldn't go
 5 line by line and say yes or no with every single
 6 firearm, but I would have a general idea, yes.
 7 Q. What would you estimate?
 8 A. Again, I'd -- I'd estimate between 20 and
 9 40%.
 10 Q. Do you know how many of the firearms listed
 11 in Exhibit 7 are AR platform rifles?
 12 A. I would have to review that data, but just
 13 at this screen there are two AR platform receivers
 14 listed.
 15 Q. Do you know how many of the listed firearms
 16 are AK platform rifles?
 17 A. Again, I'd need to review that specific
 18 data.
 19 Our customers typically purchase AR
 20 platform rifles, rather than AK platform rifles.
 21 Q. Has Piasa acquired or disposed of any
 22 firearms since 2021, other than the ones listed in
 23 this document?
 24 A. Firearms that are brought in for gunsmith

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1 services, that don't stay past close of business on
 2 the same day -- and are retrieved on the same day by
 3 the original person bringing them to us, are not
 4 required to be recorded in the Bound Book.
 5 Q. Setting aside firearms that Piasa returns
 6 to original owners after gunsmithing services, are
 7 there any firearms that Piasa has acquired and
 8 disposed of since 2021 that are not listed in this
 9 document?
 10 A. Not that -- no, we're -- we're required to
 11 record every acquisition of a firearm other than the
 12 exemption for gunsmithing overnight.
 13 Q. As you sit here today, do you know how many
 14 of the listed firearms in this document are chambered
 15 for 50 caliber BMG cartridges?
 16 A. Without reviewing every listing, no, but I
 17 know there should be at least two.
 18 (Mr. Lothson entered the deposition.)
 19 BY MR. HAZINSKI:
 20 Q. Do you have any reason to believe that it
 21 would be more than four?
 22 A. I could not speculate that without review-
 23 ing this document.
 24 Q. This next line of questioning may be

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1 obvious, but I have to ask it anyway.
 2 The acquisition/disposition records in
 3 Exhibit 7 asks for records for only firearms, and not
 4 other items, correct?
 5 A. Correct. We're not required to keep those
 6 records for other items that are not firearms.
 7 Q. Piasa doesn't maintain similar acquisition
 8 and disposition records for firearm ammunition or
 9 magazines, correct?
 10 A. Correct.
 11 Q. Piasa does not maintain similar acquisition
 12 or disposition records for firearm accessories or
 13 attachments, correct?
 14 MR. BRADY: Objection, vague --
 15 THE WITNESS: Correct.
 16 MR. BRADY: -- as to accessories and
 17 attachments.
 18 THE COURT REPORTER: What was the answer?
 19 THE WITNESS: My answer is correct, we
 20 don't maintain a Bound Book style system for acces-
 21 sories, attachments, ammunition.
 22 BY MR. HAZINSKI:
 23 Q. Okay. Does Piasa maintain any other lists
 24 or comprehensive summaries not in the Bound Book

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1 format that reflect all sales of firearm, ammunition
 2 or magazines?
 3 A. The only records we would have would be our
 4 point of sale records.
 5 Q. Similarly, there is no comprehensive list
 6 or summary of Piasa sales of firearm accessories and
 7 attachments, other than the individual point of sale
 8 records, correct?
 9 A. Correct.
 10 Q. Suppose that you wanted to determine how
 11 many magazines above a certain number of rounds Piasa
 12 had sold within a given time period? Could you
 13 generate that number by consulting any written
 14 records?
 15 A. We would need to pull reports from our
 16 point of sale, and filter out data that wouldn't be
 17 covered under that.
 18 Q. What would be involved in obtaining that
 19 data from the point of sale records?
 20 A. It could be -- It depends on how each line
 21 item is entered.
 22 Items entered into the Bound Book system
 23 are much more heavily regulated than any other item
 24 that we sell, so accuracy is extremely important, and

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1 we strive greatly to do that.
 2 The point of sale documents, we're
 3 depending on descriptions provided by manufacturers,
 4 which are dependent on that manufacturer providing
 5 accurate descriptions, so we would need to manually
 6 filter through each item that we've sold and
 7 determine if it's under that category or not.
 8 Q. When Piasa sells a magazine to a
 9 customer -- and here I mean a firearm magazine to a
 10 customer -- does the point of sale record typically
 11 indicate the capacity of that magazine?
 12 A. There's no standard for that. It may or it
 13 may not, depending on the manufacturer's description
 14 of the item.
 15 Q. I see.
 16 Does Piasa keep written records about the
 17 purpose for which each customer purchases a firearm?
 18 A. We're required to by Illinois law, yes.
 19 Q. Can you explain more about that require-
 20 ment?
 21 A. Sure. We're required to keep records of
 22 the reason for purchase, the person's occupation, and
 23 the purchase price of the firearm for any handgun or
 24 concealable firearm.

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1 Q. I apologize. Could you repeat the infor-
 2 mation you're required to document, its reason for
 3 purchase, occupation, and what else?
 4 A. Purchase price of the firearm.
 5 Q. Purchase price.
 6 Where does Piasa document the reason for
 7 purchase, the purchaser's occupation, and the pur-
 8 chase price?
 9 A. We've created a form that complies with the
 10 State requirements.
 11 Q. Does that form have a name?
 12 A. No.
 13 Q. Does Piasa create or fill out such a form
 14 for every firearm sale?
 15 A. We're required to complete it for those
 16 firearms I described earlier.
 17 We choose to complete that for every
 18 firearm transaction, yes.
 19 Q. To clarify, when you said "we're required
 20 to complete it for the firearms described earlier,"
 21 which set of firearms is that?
 22 A. We're required to complete that form for
 23 pistols, revolvers, and other concealable firearms,
 24 typically handguns.

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1 Q. But your testimony is that Piasa also
 2 completes that information, completes those forms for
 3 all rifles and shotguns, for example?
 4 A. Correct. We complete that form for every
 5 firearm that is purchased or transferred.
 6 Q. So every rifle that Piasa has sold, for
 7 example, there's corresponding documentation about
 8 the stated reason for purchase of that rifle?
 9 A. Yes.
 10 Q. Where are those forms maintained?
 11 A. We maintain that with the ATF Form 4473.
 12 Q. Is that information that you submit to the
 13 ATF?
 14 A. No. ATF does not require us to keep that
 15 information, the State does.
 16 Q. Okay. Is it fair to say that for each
 17 transaction, Piasa will complete both the ATF Form
 18 4473 and Piasa's own form documenting the reason for
 19 purchase, the occupation, and the purchase price?
 20 A. Correct.
 21 Q. Is it fair to say that for every firearm
 22 that Piasa has sold, by consulting those records, you
 23 can determine the stated purpose for the sale of that
 24 firearm?

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1 A. The stated purpose, yes.
 2 Q. How do you determine that purpose?
 3 MR. BRADY: Objection, vague, that
 4 purpose.
 5 MR. HAZINSKI: I'll ask it again.
 6 How does Piasa determine the purpose for
 7 which each firearm is purchased?
 8 THE WITNESS: We do not determine the
 9 purpose; that's up to each customer.
 10 BY MR. HAZINSKI:
 11 Q. Does the -- is the customer responsible for
 12 filling out the part of the form that indicates the
 13 purpose of the purchase?
 14 A. Yes.
 15 Q. Does Piasa review that information, as part
 16 of the sales process?
 17 A. We do.
 18 Q. What does that review involve?
 19 A. Each employee that assists a customer with
 20 the completion of the form reads it over to make sure
 21 there's no errors, omissions, and that there's
 22 nothing -- the intended purpose isn't for criminal
 23 activity.
 24 Q. Does Piasa maintain a comprehensive list

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1 within a single document of all of the purposes that
 2 customers provide for purchasing each firearm?
 3 A. You were cut off at the end.
 4 I assume you asked comprehensive list of
 5 purposes?
 6 Q. Correct.
 7 A. We do not maintain a single document of
 8 that. Each one is separate for each Form 4473.
 9 Q. Has Piasa ever consolidated that informa-
 10 tion, or analyzed it, to determine what the most
 11 frequent purposes for which customers purchase
 12 firearms?
 13 A. Only by anecdotal.
 14 Q. Is it correct to say that Piasa does not
 15 have any documents showing an aggregate result or
 16 analysis of the reasons for -- let's say, the reasons
 17 for which customers are most likely to say they want
 18 to purchase a firearm?
 19 A. Documentation, no; but experience, yes.
 20 Q. Okay. Piasa has six employees in addition
 21 to yourself; is that correct?
 22 A. Correct. I am not listed as an employee.
 23 Q. Piasa has yourself as the owner and six
 24 employees; would that be a better way to say it?

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1 A. Correct.
 2 Q. Do all of those six employees handle sales?
 3 A. No.
 4 Q. How many of them handle sales?
 5 A. I believe we have four listed.
 6 Q. Do you handle sales?
 7 A. I do.
 8 MR. HAZINSKI: I'd like to transition
 9 now, I believe, unless -- unless is anybody needing a
 10 break at this point? We've been going about 40
 11 minutes since the last one.
 12 Hearing nothing, I'll just press on.
 13 Madam Court Reporter?
 14 THE COURT REPORTER: I'm fine.
 15 BY MR. HAZINSKI:
 16 Q. Thank you.
 17 So at this point I'd like to transition
 18 away from the questioning in your capacity as 30
 19 (b)(6) witness and designee of Piasa Armory to ask
 20 questions of you, Mr. Pulaski, in your individual
 21 capacity. Does that make sense?
 22 A. Yes.
 23 Q. Perhaps it doesn't make sense. It's more
 24 of a formality, in some ways, than anything that

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1 might really materially change the conduct of this
 2 deposition; but I wanted to preserve the formality,
 3 nonetheless.
 4 You understand that you're still under
 5 oath, and you're still required to answer questions
 6 truthfully, correct?
 7 A. I do.
 8 Q. Mr. Pulaski, you understand that your
 9 attorneys have not identified you as an expert
 10 witness in this case, correct?
 11 A. I understand.
 12 Q. You understand that the opinions you will
 13 offer will be based on your own personal knowledge
 14 and experience, right?
 15 MR. BRADY: Objection --
 16 THE WITNESS: I understand.
 17 MR. HAZINSKI: I'm sorry, Sean. I want
 18 to make sure it's reflected for the record.
 19 MR. BRADY: Okay. Objection, vague as to
 20 opinions being offered.
 21 BY MR. HAZINSKI:
 22 Q. You did not prepare a written expert report
 23 in this case, did you?
 24 A. I didn't hear your entire question.

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1 Q. You didn't prepare a written expert report
 2 in this case, did you?
 3 A. I'm sorry, the tech is cutting you off.
 4 I believe you said prepare written expert
 5 testimony?
 6 Q. Yeah, let me try again. I apologize for
 7 any technological issues.
 8 The question was, you didn't prepare a
 9 written expert report in this case, did you?
 10 A. No, I did not.
 11 Q. Are you being compensated for your testi-
 12 mony today?
 13 A. I am not.
 14 Q. What is your highest level of education?
 15 A. I have an Associate's Degree.
 16 Q. What field is that in?
 17 A. Criminal justice.
 18 Q. Apart from the Associate's Degree in
 19 criminal justice, have you taken any other -- have
 20 you pursued any other college or university-level
 21 studies?
 22 A. No.
 23 Q. Could you please summarize any formal
 24 education you've had relating to firearms?

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1 A. I've had numerous trainings as a firearms
 2 instructor.
 3 Q. Who offered those trainings?
 4 A. Again, numerous, but mostly notably the
 5 National Rifle Association, the United States Conceal
 6 Carry Association.
 7 Q. You, personally, own a wide variety of
 8 firearms, correct?
 9 MR. BRADY: Objection, right to privacy.
 10 Mr. Pulaski is not an individual
 11 plaintiff in this matter, and he's testified that
 12 he's not offering any testimony as to his personal
 13 opinions in this matter.
 14 He was offered as -- on behalf -- as an
 15 officer and representative of Piasa, who is a
 16 plaintiff.
 17 His personal firearm ownership is fully
 18 irrelevant, and it violates his right to privacy, to
 19 ask that question.
 20 Unless he wants to waive that right, I
 21 would instruct him not to answer.
 22 BY MR. HAZINSKI:
 23 Q. Do you recall testifying in a deposition in
 24 October that you own a wide variety of firearms,

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1 correct?
 2 A. That was my testimony during that deposi-
 3 tion.
 4 Q. Thank you.
 5 Mr. Pulaski, do you provide -- you, per-
 6 sonally, provide firearms training at Piasa?
 7 A. I do.
 8 Q. Does that training include instruction on
 9 using firearms for self-defense or personal protec-
 10 tion?
 11 A. It does.
 12 Q. Based on your own experience and observa-
 13 tion, do you have opinions about what types of
 14 firearms are best suited for self-defense or personal
 15 protection?
 16 A. I have personal opinions, yes, but that's
 17 up to each individual.
 18 Q. How did you form those opinions?
 19 A. Through experience and research.
 20 Q. To prepare for your testimony today, did
 21 you review any data or surveys about which firearms
 22 are most commonly used for self-defense or personal
 23 protection?
 24 A. Not in preparation for today's testimony,

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1 no.
 2 Q. For your -- in preparation for your
 3 testimony today, did review any studies or other
 4 literature discussing which firearms are best suited
 5 for self-defense or personal protection?
 6 A. Again, I did not review any studies or
 7 other data in prep for today.
 8 Q. In your role at Piasa Armory, do you advise
 9 customers about what weapons to buy for self-defense
 10 purposes?
 11 A. I do.
 12 Q. I'm going to pose a hypothetical.
 13 If a -- if a first time gun buyer comes
 14 to Piasa and asks for advice about what firearm to
 15 purchase for personal protection or self-defense, how
 16 would you advise them?
 17 MR. BRADY: Objection, incomplete hypo-
 18 thetical, calls for speculation, vague.
 19 You may answer.
 20 THE WITNESS: That's a case-by-case
 21 basis, depending on the specific needs of each
 22 customer.
 23 BY MR. HAZINSKI:
 24 Q. What more information would you need in

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1 order to advise that customer about what firearm they
 2 ought to buy?
 3 A. We would need information about the speci-
 4 fic intended use of the firearm, what potential
 5 threats they may face, what type of budget they have
 6 in mind for their purchase, and what prior experience
 7 they have.
 8 Q. Are there any specific firearms or cate-
 9 gories of firearms that you have found you most
 10 frequently recommend to first time gun buyers looking
 11 to purchase a firearm for self-defense or personal
 12 protection?
 13 MR. BRADY: Objection, incomplete hypo-
 14 thetical and vague.
 15 You may answer.
 16 THE WITNESS: Again, that depends on the
 17 intended purpose.
 18 We may recommend one type of firearm for,
 19 say, conceal carry, and another type of firearm for
 20 home protection.
 21 Again, it depends on the case by case.
 22 BY MR. HAZINSKI:
 23 Q. I understand it can vary by the context of
 24 each individual.

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1 My question is more asking overall, in
 2 your many years of experience selling these weapons
 3 and advising customers, are there certain weapons or
 4 categories of weapons that you tend to more
 5 frequently recommend for personal protection or
 6 self-defense?
 7 MR. BRADY: Objection --
 8 THE WITNESS: There are two cat -- Go
 9 ahead.
 10 MR. BRADY: Objection, incomplete hypo-
 11 thetical, misstates testimony.
 12 You may answer.
 13 THE WITNESS: We do have two particular
 14 recommendations regularly for customers, prior to
 15 PICA's enactment.
 16 BY MR. HAZINSKI:
 17 Q. What are those?
 18 A. I typically recommend AR-15-style rifles
 19 for home defense, and Glock-style handguns for
 20 concealed carry.
 21 Q. Why did Piasa recommend AR-15-style rifles
 22 for home defense?
 23 A. We recommend those based on ease of use by
 24 a variety of people. They're extremely customizable.

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1 For example, a large male can use the
 2 same firearm as a smaller female, and they also have
 3 a standard capacity magazine that allows defense
 4 against more than one threat.
 5 Q. What does the phrase, standard capacity
 6 magazine, refer to?
 7 A. That's different for each firearm, but the
 8 current standard capacity for AR-15s is 30 rounds.
 9 Q. So you recommend AR-15s, or I should say,
 10 before PICA was enacted, Piasa -- Strike that ques-
 11 tion.
 12 Before PICA was enacted, you recommended
 13 AR-15s for home defense, in part because magazines
 14 came standard at 30 rounds for many of those weapons,
 15 correct?
 16 MR. BRADY: Objection, misstates testi-
 17 mony.
 18 MR. HAZINSKI: Did I characterize your --
 19 did I characterize your testimony correctly?
 20 THE WITNESS: I'm sorry, it cut you off
 21 again.
 22 MR. HAZINSKI: The question is, I just
 23 want to clarify -- you recommended AR-15s for home
 24 defense, in part because of the large standard

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1 capacity magazine size for such weapons, correct?
 2 MR. BRADY: Objection, misstates --
 3 THE WITNESS: That was one of -- one of
 4 the many reasons.
 5 MR. HAZINSKI: Okay.
 6 THE COURT REPORTER: What was the rest of
 7 the objection, Sean?
 8 MR. BRADY: Oh, just it misstates testi-
 9 mony.
 10 THE COURT REPORTER: Thank you.
 11 BY MR. HAZINSKI:
 12 Q. Why do you recommend Glock firearms for
 13 self-defense?
 14 MR. BRADY: Objection --
 15 THE WITNESS: It depends on --
 16 MR. BRADY: -- misstates testimony.
 17 THE WITNESS: That depends on many
 18 factors.
 19 Again, we ask several questions of
 20 customers when they're looking for firearms for
 21 self-defense.
 22 Typically, for somebody who is less
 23 experienced, or fits within a certain budget, or
 24 prefers a certain style, those are the reasons we

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1 recommend Glock-style firearms.
 2 BY MR. HAZINSKI:
 3 Q. Have you ever advised a customer or a
 4 potential customer that a certain firearm would not
 5 be suitable for self-defense or personal protection?
 6 A. We have, yes.
 7 Q. Which firearms?
 8 A. Typically those firearms with a history of
 9 poor reliability.
 10 Q. And which firearms are those?
 11 A. Some of the firearms that are regulated
 12 under Illinois' melting point law tend to fall into
 13 that category.
 14 Q. Other than firearms under Illinois's
 15 melting point law, are there any firearms that you've
 16 advised a customer or a potential customer that they
 17 would not be suitable for self-defense or personal
 18 protection?
 19 A. Without an encyclopedic listing of every
 20 firearm we've ever recommended, I wouldn't be able to
 21 recommend which ones, but I'm certain that we have in
 22 the past.
 23 Q. Other than poor reliability, are there any
 24 other reasons that you have advised customers that a

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1 certain firearm is not suitable for personal protec-
 2 tion or self-defense?
 3 A. Typically, it's poor reliability or diffi-
 4 culty in use, would be the two categories that would
 5 make us recommend away from a certain firearm.
 6 Q. Can you explain what you mean by "diffi-
 7 culty in use"?
 8 A. A firearm that's overly complicated to load
 9 or fire or fix a malfunction.
 10 Q. Can you give me examples of firearms that
 11 are in that category?
 12 A. The most immediate would be the Kel-Tec
 13 brand shotgun KSG. They're a little difficult to
 14 load, for someone who's not experienced with firing
 15 shotguns.
 16 Q. Have you ever advised a customer to buy a
 17 revolver for personal protection or self-defense?
 18 A. I typically advise against those for most
 19 customers, but they -- we have for sure recommended
 20 those for customers in the past, yes.
 21 Q. Why do you typically advise against them?
 22 A. Typically people that are recommended --
 23 that come in looking for those are recommended by
 24 someone who doesn't have relevant firearm experience

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1 or is going off of recommendations from the past, and
 2 typically involves a person who doesn't have the
 3 ability to use that firearm reliably or proficiently.
 4 Q. In your opinion, is it -- are revolvers too
 5 difficult to use reliably or efficiently to be suit-
 6 able for personal protection or self-defense for most
 7 consumers?
 8 A. No. I believe they're suitable for self-
 9 defense; however, they're not the best choice for
 10 self-defense for most consumers.
 11 Q. Have you ever advised a customer to buy a
 12 pump action shotgun for personal protection or
 13 self-defense?
 14 A. We have, especially since the passage of
 15 PICA.
 16 Q. Why have you recommended pump action
 17 shotguns for personal protection or self-defense?
 18 A. Again, it depends on the specific circum-
 19 stances of each customer and what reason for purchase
 20 they may have; but now, because of PICA, the list of
 21 firearms that are available, the long-end category
 22 rifles or shotguns, is heavily restricted to mostly
 23 pump action shotguns and very few semiautomatic
 24 rifles.

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1 Q. Have you recommended SKS rifles with
 2 detachable magazines to customers for personal
 3 protection or self-defense?
 4 A. We have not been asked if one of those was
 5 recommended for self-defense by a customer, to my
 6 recollection.
 7 Typically we'd recommend a modern firearm,
 8 rather than a firearm that would be of the SKS era or
 9 variety.
 10 Q. Have you recommended rifles chambered with
 11 50 caliber BMG ammunition for personal protection or
 12 self-defense?
 13 A. We have not, and have not been asked if
 14 that would be a suitable firearm for self-defense,
 15 that I can recall.
 16 Q. You have not been asked, and you have also
 17 not offered that as a -- as a suggestion to a cus-
 18 tomer seeking a weapon for personal protection or
 19 self-defense; is that fair?
 20 A. Correct.
 21 Q. Why not?
 22 A. I'm sorry. Did you ask why?
 23 Q. Yeah, why?
 24 A. Sure. The typical 50 caliber BMG chambered

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1 rifle is extremely heavy, very large, and expensive.
 2 Q. The -- What effect does the fact that the
 3 typical 50 caliber BMG rifle is heavy and large, what
 4 effect does that have on its utility for self-defense
 5 or personal protection?
 6 A. I think that would depend on each individ-
 7 ual, but a small-statured woman would have difficulty
 8 in using a 20-pound rifle or heavier.
 9 Q. Have you ever recommended a rifle chambered
 10 in 50 caliber BMG ammunition to a large-statured man
 11 for the purpose of personal protection or self-
 12 defense?
 13 A. Again, we have not been asked that question
 14 by anybody, to my knowledge, but we would recommend
 15 something smaller and easier to use for most people.
 16 Q. Have you recommended semiautomatic firearms
 17 with a capacity to accept a belt ammunition feeding
 18 device for personal protection or self-defense?
 19 A. We have not been asked that question in the
 20 past.
 21 Typically, belt fed semiautomatic
 22 firearms are not readily available to most customers,
 23 and the modern offerings are very limited, and are
 24 sold directly to most consumers instead of through

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1 dealers.
 2 Q. When you say "they're not readily avail-
 3 able," what do you mean?
 4 A. Sorry; some clarity.
 5 The most commonly belt fed firearms that
 6 we've dealt with are reproductions of antique
 7 firearms or firearms that would be -- not antique,
 8 pardon me -- antique firearms that would -- older
 9 firearms that would be covered under the curio and
 10 relics category, older than 50 years.
 11 There are some modern versions of those,
 12 but again, they're expensive, and not a common item
 13 that we would have offered for sale.
 14 Again, the manufacturer of those tends to
 15 prefer to sell directly to the consumer and use
 16 dealers only as a transfer.
 17 Q. Assuming that a customer came to Piasa
 18 and asked you whether a semiautomatic firearm with
 19 capacity to accept belt fed ammunition feeding device
 20 was suitable for personal protection or self-defense,
 21 how would you advise a customer in that situation?
 22 MR. BRADY: Objection, incomplete hypo-
 23 thetical, calls for speculation.
 24 You may answer.

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1 THE WITNESS: If somebody asked us for a
 2 belt fed semiautomatic firearm for self-defense, we
 3 would basically ask them what the intended purpose
 4 was for.
 5 Again, self-defense, we would tend to
 6 recommend against something that's a little bit
 7 easier to use for most consumers; again, something
 8 like the standard AR-15-style firearm that has an
 9 easily detachable magazine instead of a belt
 10 ammunition device.
 11 BY MR. HAZINSKI:
 12 Q. Okay. I'm going to ask about shotguns with
 13 revolving cylinders.
 14 Is it -- is it theoretically possible for
 15 a person to use a shotgun with a revolving cylinder
 16 for personal protection or self-defense?
 17 MR. BRADY: Objection, calls for specu-
 18 lation, incomplete hypothetical.
 19 You can answer.
 20 THE WITNESS: It's possible for anyone to
 21 use any firearm of any variety-type style caliber as
 22 a self-defense item.
 23 BY MR. HAZINSKI:
 24 Q. One of the fire -- types of firearms that

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<p>1 Piasa has sold is a (inaudible) KS-12 shotgun, 2 correct? 3 THE COURT REPORTER: Wait. 4 Repeat that, please. 5 MR. HAZINSKI: I'll go slower. 6 One of the types of firearms that Piasa 7 has sold is a Kalashnikov KS-12 shotgun, correct? 8 THE WITNESS: Without reviewing specific 9 records, I would presume that we have at some point 10 transferred or sold something like that. 11 BY MR. HAZINSKI: 12 Q. What type of weapon is the Kalashnikov 13 KS-12? 14 A. To the best of my recollection, that is an 15 AK-47 platform derivative, shoots 12 gauge ammuni- 16 tion. 17 Q. Have you ever recommended a Kalashnikov 18 KS-12 for personal protection or self-defense? 19 A. That specific firearm, no. 20 Q. Would you recommend it for those purposes? 21 A. It is possible. 22 It would not be among the first of my 23 recommendations, but it could be on that list, yes. 24 Q. What are the circumstances where you might</p>	<p>1 THE WITNESS: Yes. 2 MR. HAZINSKI: All right, maybe we'll 3 reconvene at 12:30, if that's acceptable? 4 MR. BRADY: Perfect. 5 MR. HAZINSKI: Thank you. 6 (Recess taken) 7 DIRECT EXAMINATION CONTINUED 8 BY MR. HAZINSKI: 9 Q. I just have few more questions before we 10 wrap up. 11 I want to show you again the 12 interrogatory responses that I asked you about 13 earlier. 14 This is Exhibit 3, and I'll attempt to 15 share my screen. 16 Mr. Pulaski, can you see this document on 17 your screen? 18 A. Yes. 19 Q. I want to ask about the response to 20 Interrogatory No. 8, which says "Responding Party may 21 rely on testimony from Scott Pulaski, a longtime 22 federally licensed firearm dealer, about the nature 23 of the firearms market in Illinois before and after 24 the adoption of PICA." Do you see that?</p>
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<p>1 recommend the Kalashnikov KS-12 for personal pro- 2 tection or self defense? 3 A. Again, that would be dependent upon each 4 customer. Everybody that has their own personal 5 preferences and use cases, but those are a type of 6 semiautomatic shotgun that are easy to reload, easy 7 to use for most consumers, apart from a 8 standard-style semiautomatic shotgun. 9 Q. What types of use cases would you recommend 10 the Kalashnikov KS-12 for? 11 A. That would be, again, dependent upon each 12 customer. Again, we typically don't recommend a 13 shotgun for personal defense, other than now, with 14 PICA. 15 We usually recommend -- would potentially 16 recommend something like that for someone who did not 17 want a rifle, but wanted a shotgun. 18 MR. HAZINSKI: I only have a few more 19 questions, but I think since we've been going now for 20 a while, let's take a short break, and I'll probably 21 wrap up within -- within a little while, and maybe we 22 can avoid taking a -- taking a longer lunch break; is 23 that okay with everybody? 24 MR. BRADY: Fine by me.</p>	<p>1 A. I do. 2 Q. Just to be clear, the testimony you are 3 giving in this case is testimony as a lay witness, 4 based on your personal observation and experience, 5 rather than as a disclosed expert witness, correct? 6 MR. BRADY: Objection, calls for a legal 7 conclusion. 8 You may answer. 9 THE WITNESS: Again, I'm not a legal 10 expert, but my understanding is I'm just testifying 11 as a representative of Piasa Armory, and part of it 12 is my personal experience in the firearms industry. 13 BY MR. HAZINSKI: 14 Q. So, for example, have you conducted any 15 studies of the firearms market in Illinois? 16 A. Our company has conducted studies of the 17 firearms market through the National Shooting Sports 18 Foundation in the past. 19 Q. When you say "our company," are you refer- 20 ring to Piasa Armory? 21 A. Yes, Piasa Armory. 22 Q. Okay. Can you -- you mentioned studies. 23 Which studies are you referring to? 24 A. The National Shooting Sports Foundation</p>

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1 provides customized market reports, which is the
 2 number of potential customers in a given area,
 3 depending on what each company requests.
 4 They also provide data that they have
 5 collected over the years.
 6 Q. How many of these reports has Piasa
 7 received from NSSF?
 8 A. I don't recall the exact number of reports
 9 the customized market detail, but I believe two; and
 10 I review the other reports on an every so often
 11 basis, every other year or so, which offerings may be
 12 available through NSSF.
 13 Q. You mentioned the customized market
 14 reports, and you said there have been about two of
 15 those, right?
 16 A. Correct, that I recall.
 17 Q. Okay. There are other reports, as well,
 18 from NSSF, correct?
 19 A. Yes.
 20 Q. What are those reports?
 21 A. Again, there's -- there are many.
 22 They conduct extensive surveys and
 23 reporting on the industry trends, but I can think of
 24 some of, you know, new entries into the shooting

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1 sports world by minorities and women, firearms that
 2 are -- firearms that are like a modern sporting
 3 style, firearms that are prevalent in the industry,
 4 and trends in hunting and -- and other similar use of
 5 firearms that we've reviewed in the past.
 6 Q. Those studies from NSSF that you were just
 7 describing, are those studies all conducted by NSSF?
 8 MR. BRADY: Objection, calls for specula-
 9 tion.
 10 THE WITNESS: I can't testify to the
 11 methods and modes of compiling that information,
 12 because we're not the ones --
 13 MR. HAZINSKI: Are all those --
 14 THE WITNESS: -- who did it.
 15 BY MR. HAZINSKI:
 16 Q. Are all those reports and studies published
 17 by NSSF?
 18 MR. BRADY: Objection, calls for specula-
 19 tion.
 20 THE WITNESS: Again, I have no knowledge
 21 of whether they are published by or merely provided
 22 by NSSF. We just have access to them through our
 23 membership with NSSF.
 24 BY MR. HAZINSKI:

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1 Q. Are you or Piasa Armory responsible for
 2 conducting or authoring any of those studies?
 3 A. No.
 4 Q. I'm going to ask more about the customized
 5 market reports.
 6 What kind of information is included in
 7 those reports?
 8 A. That information was demographic and
 9 household data from a given distance from our address
 10 that we provided.
 11 Q. Do you or does Piasa provide information
 12 to NSSF in order to facilitate the creation of those
 13 customized market reports?
 14 A. We have not ordered one of those reports in
 15 several years, but the best of my recollection is we
 16 just provided our address, and they conducted that,
 17 based on available data.
 18 Q. Other than the number of potential custo-
 19 mers within a certain geographic range, do the
 20 customized market reports provide additional infor-
 21 mation?
 22 A. I think they have estimates based on NSSF's
 23 other data of how many potential customers there may
 24 be in that given area.

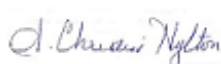
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1 Q. Do they contain any other information other
 2 than the number of potential customers?
 3 A. I would need to review that data again.
 4 It's been a little while.
 5 Q. When was the last time Piasa received one
 6 of these customized market reports from NSSF?
 7 A. Again, I need to review our -- our order
 8 history from them, but I believe it was 2016,
 9 thereabouts.
 10 Q. Any particular reason that you stopped
 11 requesting those customized market reports from NSSF?
 12 A. One factor was the cost. They aren't --
 13 they aren't free; we have to pay them for that data.
 14 We also typically did them when we
 15 relocated.
 16 Q. To prepare for your deposition today, did
 17 you specifically review any of the NSSF reports or
 18 studies that you referred to earlier?
 19 A. As I said earlier, I did not review any
 20 NSSF studies before.
 21 Q. The NSSF studies that you mentioned, not
 22 the customized market reports, but the other studies
 23 produced by NSSF, do any of those specifically
 24 discuss the market for firearms in Illinois?

<p style="text-align: right;">Page 106</p> <p>1 A. Not to my knowledge.</p> <p>2 Q. Do you have access to any statewide data on</p> <p>3 firearm sales in Illinois?</p> <p>4 A. They're, to my knowledge, not comprehensive</p> <p>5 statewide data of firearm sales, only the transaction</p> <p>6 numbers that we receive from state police when we</p> <p>7 conduct background checks and surveys conducted</p> <p>8 through groups like NSSF and National Rifle Associ-</p> <p>9 ation.</p> <p>10 Q. Apart from the customized market reports</p> <p>11 you discussed earlier, does Piasa conduct any market</p> <p>12 research or market analysis as part of its business</p> <p>13 operations?</p> <p>14 A. Other than reviewing our sales data, no.</p> <p>15 Q. Based on your personal experience and</p> <p>16 observations, how would you describe the effect of</p> <p>17 PICA on the firearms market in Illinois?</p> <p>18 MR. BRADY: Objection, vague, calls for a</p> <p>19 narrative.</p> <p>20 You may answer.</p> <p>21 THE WITNESS: My personal experience</p> <p>22 with our customers is that they are concerned of the</p> <p>23 status of the firearms marketed in Illinois. They</p> <p>24 have a lot of uncertainty which items are legal,</p>	<p style="text-align: right;">Page 108</p> <p>1 Q. Okay. Is it a fair summary of your</p> <p>2 testimony to say that based on your experience and</p> <p>3 observations, customers are concerned about whether</p> <p>4 particular items may or may not be regulated by PICA,</p> <p>5 customers have expressed a fear of transferring</p> <p>6 firearms, and plus customers have expressed an un-</p> <p>7 willingness to purchase new firearms while there's</p> <p>8 ongoing litigation; is that a fair summary of your</p> <p>9 testimony?</p> <p>10 A. I wouldn't say most customers, but I would</p> <p>11 say many customers.</p> <p>12 Q. Other than those observations, have you</p> <p>13 made any other observations about the effect of PICA</p> <p>14 on the firearms market in Illinois?</p> <p>15 A. Just what I stated.</p> <p>16 Q. Those observations are based on conversa-</p> <p>17 tions you've had with customers at Piasa Armory,</p> <p>18 correct?</p> <p>19 A. Yes, customers that we've interacted with</p> <p>20 here.</p> <p>21 Q. Were those opinions and observations based</p> <p>22 on anything else in addition to those conversations?</p> <p>23 A. No, just what we've observed with customers</p> <p>24 and people in the area that have come in and talked</p>
<p style="text-align: right;">Page 107</p> <p>1 which are not legal, which are allowed under PICA,</p> <p>2 what the requirements for compliance with PICA may</p> <p>3 be. Many are afraid to purchase new, for fear that</p> <p>4 they are -- or transfer new, for fear that they are</p> <p>5 not complying with PICA.</p> <p>6 BY MR. HAZINSKI:</p> <p>7 Q. Other than observing that your customers</p> <p>8 are concerned about the status of certain items and</p> <p>9 their lawfulness under PICA, and their fear of trans-</p> <p>10 ferring certain items under PICA, have you observed</p> <p>11 any other effects of PICA on the firearms market in</p> <p>12 Illinois?</p> <p>13 MR. BRADY: Objection, misstates testi-</p> <p>14 mony, vague, calls for a narrative, incomplete</p> <p>15 hypothetical.</p> <p>16 You may answer.</p> <p>17 THE WITNESS: Statements from customers</p> <p>18 that we've heard many times of that they are un-</p> <p>19 willing to purchase now, or are waiting until PICA</p> <p>20 makes its way through the court system, until the</p> <p>21 cases have resolution, before they'll be interested</p> <p>22 in purchasing certain things again, or anything</p> <p>23 again.</p> <p>24 BY MR. HAZINSKI:</p>	<p style="text-align: right;">Page 109</p> <p>1 to us about PICA observations.</p> <p>2 Q. Just give me one quick moment here.</p> <p>3 Would it being fair to say that the</p> <p>4 impressions that you have of the effects of PICA on</p> <p>5 potential gun buyers in Illinois is based on anec-</p> <p>6 dotal observation, rather than something like a</p> <p>7 comprehensive survey?</p> <p>8 MR. BRADY: Objection, vague.</p> <p>9 THE WITNESS: To my knowledge, there is</p> <p>10 not a comprehensive survey of Illinois for that.</p> <p>11 That's not a -- not a thing that's been done by the</p> <p>12 national organizations, to my knowledge.</p> <p>13 BY MR. HAZINSKI:</p> <p>14 Q. Just to sort of return to the question,</p> <p>15 then, your -- your observations are -- would it be</p> <p>16 fair to say that your observation about the effect of</p> <p>17 PICA on the firearms market in Illinois are based on</p> <p>18 your overall impressions based on particular conver-</p> <p>19 sations?</p> <p>20 A. Yes, interactions with customers and</p> <p>21 members of the Illinois public.</p> <p>22 Q. Do those conversations that you've had</p> <p>23 allow you to create a -- any numerical estimates</p> <p>24 about, for example, the effect on rates of sale of</p>

Page 110	<p>1 particular firearms in Illinois?</p> <p>2 A. Nothing concrete that we could base a study</p> <p>3 off of, just anecdotal customers who state they would</p> <p>4 have purchased an item but for PICA, or would have</p> <p>5 purchased a second item that was not necessarily PICA</p> <p>6 compliant, but for PICA.</p> <p>7 Q. The last thing, the NSSF studies that you</p> <p>8 mentioned, other than the customized market reports,</p> <p>9 those generally describe trends in the firearms</p> <p>10 industry nationwide; is that fair?</p> <p>11 A. That's fair, yes.</p> <p>12 Q. Have any of those studies informed your</p> <p>13 opinions about the effect of PICA on the Illinois</p> <p>14 firearms market?</p> <p>15 A. Every bit of information I take in affects</p> <p>16 my opinions of PICA on the Illinois firearms market,</p> <p>17 so NSSF and any other relevant information.</p> <p>18 Q. Are there any particular pieces of informa-</p> <p>19 tion from national NSSF reports that you can speci-</p> <p>20 fically identify that have affected your view about</p> <p>21 the effect of PICA on the Illinois firearms market?</p> <p>22 A. I would need to refer to the specific</p> <p>23 study, but I recall, I believe, an NSSF study that</p> <p>24 mentioned that the AR-15 platform was more common</p>	Page 112	<p>1 I would have to review all the variety of</p> <p>2 studies we've purchased over the years and had access</p> <p>3 to over the years.</p> <p>4 MR. HAZINSKI: Thank you, Mr. Pulaski.</p> <p>5 I don't have any other questions.</p> <p>6 THE COURT REPORTER: Do you mind taking</p> <p>7 down the exhibit? Thank you.</p> <p>8 MR. HAZINSKI: Does anyone have anything</p> <p>9 else?</p> <p>10 MR. BRADY: Nothing for me.</p> <p>11 MR. SIGALE: No questions.</p> <p>12 MR. HOERNER: I don't have any questions.</p> <p>13 MS. GANNON: Nothing from me, thanks.</p> <p>14 THE COURT REPORTER: Okay. John, are you</p> <p>15 ordering this transcribed?</p> <p>16 MR. HAZINSKI: Yes, please.</p> <p>17 THE COURT REPORTER: Sean, copy?</p> <p>18 MR. BRADY: Yes, please.</p> <p>19 THE COURT REPORTER: Would anybody else</p> <p>20 like a copy?</p> <p>21 MR. SIGALE: Ms. Hylton, this is David</p> <p>22 Sigale.</p> <p>23 We're not going to order at this time,</p> <p>24 but we'll certainly let you know if we -- if we</p>
Page 111	<p>1 than the F150 pickup truck in the U.S., as far as</p> <p>2 private ownership.</p> <p>3 Q. Did you ever examine the -- the data or</p> <p>4 methodology underlying NSSF's estimates of the number</p> <p>5 of AR-15s in circulation in the United States?</p> <p>6 A. I have not --</p> <p>7 MR. BRADY: Objection to the underlying</p> <p>8 data.</p> <p>9 MR. HAZINSKI: I'm sorry, I didn't hear</p> <p>10 the answer.</p> <p>11 THE WITNESS: I was letting Mr. Brady</p> <p>12 finish his speech.</p> <p>13 I'm not a statistician or expert in</p> <p>14 methodology, so I can't speak to the methodology and</p> <p>15 information they use, just that they are the recog-</p> <p>16 nized expert in our industry.</p> <p>17 BY MR. HAZINSKI:</p> <p>18 Q. Other than conclusions from NSSF that</p> <p>19 AR-15s are more frequent than Ford F150s, are there</p> <p>20 any other specific pieces of information from NSSF</p> <p>21 research that you can identify that have shaped your</p> <p>22 understanding of the effect of PICA on the Illinois</p> <p>23 firearms market?</p> <p>24 A. Not that I can cite specifically.</p>	Page 113	<p>1 decide to get a copy later.</p> <p>2 THE COURT REPORTER: All right.</p> <p>3 Mr. Lothson, whom do you represent?</p> <p>4 MR. LOTHSON: I represent the Barnett</p> <p>5 plaintiff group.</p> <p>6 Yes, I'll take a copy.</p> <p>7 (Reading and signing of the deposition</p> <p>8 was not waived.)</p> <p>9 (The deposition concluded at 12:52 p.m.)</p> <p>10</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>

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1 **C E R T I F I C A T E**
 2 I, the undersigned, a Certified
 3 Shorthand Reporter, Registered Professional Reporter
 4 and Notary Public, do hereby certify that I acted as
 5 the Registered Professional Reporter in the foregoing
 6 matter at the time and place indicated herein; that I
 7 took in shorthand the proceedings had at said time
 8 and place; that said shorthand notes were reduced
 9 to typewriting under my supervision and direction,
 10 correct transcript of the shorthand notes so taken;
 11 that said deposition was submitted to the witness for
 12 signature as requested and that any changes, if any,
 13 requested by the witness are attached hereto.
 14
 15 I further certify that I am neither
 16 attorney nor counsel for, or related to or employed
 17 by any of the parties in the foregoing matter, and
 18 further that I am not a relative or employee of any
 19 attorney or counsel employed by the parties hereto,
 20 or financially interested in the action.
 21 IN WITNESS WHEREOF, I have hereunto
 22 set my hand and seal this 4th day of June, 2024.
 23
 24 

 A. Christine Hylton
 Registered Professional Reporter
 and Notary Public

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1 Veritext Legal Solutions
 2 1100 Superior Ave
 3 Suite 1820
 4 Cleveland, Ohio 44114
 5 Phone: 216-523-1313
 6
 7 June 14th, 2024
 8
 9 To: SEAN A. BRADY, ESQ.
 10
 11 Case Name: Federal Firearms Licensees Of Illinois Et Al. v. Pritzker,
 12 Jay Robert "JB" Et Al.
 13 Veritext Reference Number: 6721335
 14 Witness: Piasa Armory, LLC Deposition Date: 5/31/2024
 15
 16 Dear Sir/Madam:
 17
 18 Enclosed please find a deposition transcript. Please have the witness
 19 review the transcript and note any changes or corrections on the
 20 included errata sheet, indicating the page, line number, change, and
 21 the reason for the change. Have the witness' signature notarized and
 22 forward the completed page(s) back to us at the Production address
 23 shown
 24 above, or email to production-midwest@veritext.com.
 25
 26 If the errata is not returned within thirty days of your receipt of
 27 this letter, the reading and signing will be deemed waived.
 28
 29 Sincerely,
 30
 31 Production Department
 32
 33 NO NOTARY REQUIRED IN CA

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1 **D E P O S I T I O N R E V I E W**
 2 **C E R T I F I C A T I O N O F W I T N E S S**
 3
 4 ASSIGNMENT REFERENCE NO: 6721335
 5 CASE NAME: Federal Firearms Licensees Of Illinois Et Al. v.
 6 Pritzker, Jay Robert "JB" Et Al.
 7 DATE OF DEPOSITION: 5/31/2024
 8 WITNESS' NAME: Piasa Armory, LLC
 9 In accordance with the Rules of Civil
 10 Procedure, I have read the entire transcript of
 11 my testimony or it has been read to me.
 12 I have made no changes to the testimony
 13 as transcribed by the court reporter.
 14
 15 _____
 16 Date Piasa Armory, LLC
 17 Sworn to and subscribed before me, a
 18 Notary Public in and for the State and County,
 19 the referenced witness did personally appear
 20 and acknowledge that:
 21
 22 They have read the transcript;
 23 They signed the foregoing Sworn
 24 Statement; and
 25 Their execution of this Statement is of
 their free act and deed.
 I have affixed my name and official seal
 this ____ day of _____, 20____.

 Notary Public

 Commission Expiration Date

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1 **D E P O S I T I O N R E V I E W**
 2 **C E R T I F I C A T I O N O F W I T N E S S**
 3
 4 ASSIGNMENT REFERENCE NO: 6721335
 5 CASE NAME: Federal Firearms Licensees Of Illinois Et Al. v.
 6 Pritzker, Jay Robert "JB" Et Al.
 7 DATE OF DEPOSITION: 5/31/2024
 8 WITNESS' NAME: Piasa Armory, LLC
 9 In accordance with the Rules of Civil
 10 Procedure, I have read the entire transcript of
 11 my testimony or it has been read to me.
 12 I have listed my changes on the attached
 13 Errata Sheet, listing page and line numbers as
 14 well as the reason(s) for the change(s).
 15 I request that these changes be entered
 16 as part of the record of my testimony.
 17
 18 I have executed the Errata Sheet, as well
 19 as this Certificate, and request and authorize
 20 that both be appended to the transcript of my
 21 testimony and be incorporated therein.
 22
 23 _____
 24 Date Piasa Armory, LLC
 25 Sworn to and subscribed before me, a
 26 Notary Public in and for the State and County,
 27 the referenced witness did personally appear
 28 and acknowledge that:
 29 They have read the transcript;
 30 They have listed all of their corrections
 31 in the appended Errata Sheet;
 32 They signed the foregoing Sworn
 33 Statement; and
 34 Their execution of this Statement is of
 35 their free act and deed.
 I have affixed my name and official seal
 this ____ day of _____, 20____.

 Notary Public

 Commission Expiration Date

1 ERRATA SHEET
 2 VERITEXT LEGAL SOLUTIONS MIDWEST
 3 ASSIGNMENT NO: 6721335
 3 PAGE/LINE(S) / CHANGE /REASON
 4 _____
 5 _____
 6 _____
 7 _____
 8 _____
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____

20 Date _____ Piasa Armory, LLC
 21 SUBSCRIBED AND SWORN TO BEFORE ME THIS _____
 22 DAY OF _____, 20_____.
 23 _____
 24 Notary Public
 25 _____
 Commission Expiration Date

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[5 - additions]

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<p>v</p>	<p>w</p>		
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			<p>x</p>
			<p>x 4:1,6</p>
			<p>y</p>
			<p>yards 41:14 yeah 21:1 42:6 42:10 45:7 83:6</p>

[yeah - zoom]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

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

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

(A) to review the transcript or recording; and

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

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

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

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

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

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

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

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.

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

FEDERAL FIREARMS
LICENSEES OF ILLINOIS, *et al.*,
Plaintiffs,
vs.
JAY ROBERT “JB” PRITZKER, *et al.*,
Defendants.

Case No. 3:23-cv-215-SPM

**NOTICE OF RULE 30(b)(6) DEPOSITION
TO PLAINTIFF PIASA ARMORY, LLC**

To:

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PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendants will take the deposition upon oral examination of Plaintiff Piasa Armory, LLC through one or more of its officers, directors, agents, or other representatives who shall be designated to testify on Piasa Armory’s behalf regarding all information known or reasonably available to Piasa Armory with respect to the subjects listed in the attached Rider. The deposition shall take place before an officer authorized to administer oaths as required by Rule 28(a) and shall be recorded by video and/or by stenographic means.

Deponent Name	Date & Time	Location
Piasa Armory, LLC	Wednesday, May 29, 2024 10 a.m.	Videconference link to the Office of the Illinois Attorney General 115 S. LaSalle St. Chicago, IL 60603

**RIDER TO NOTICE OF DEPOSITION OF
PIASA ARMORY, LLC PURSUANT TO RULE 30(b)(6)**

Plaintiff Piasa Armory, LLC, through one or more of its officers, directors, agents, or other representatives, shall testify regarding all information known or reasonably available to Piasa Armory with respect to the subjects listed below:

1. Piasa Armory's business operations, including its firearms sales, training, gunsmith services, and shooting range.
2. The effect(s) of the Protect Illinois Communities Act on Piasa Armory and its customers.
3. Which items Piasa Armory has offered for sale, including items whose purchase and sale is restricted by the Protect Illinois Communities Act.
4. Which items Piasa Armory contends are unlawfully regulated by the Protect Illinois Communities Act in violation of the Second Amendment.
5. Piasa Armory's revenues, profits, and losses, including revenues and profits attributable to items whose purchase and sale is restricted by the Protect Illinois Communities Act.
6. Data, analysis, and information relied upon by Piasa Armory in identifying and responding to trends in the firearms industry and market.
7. Piasa Armory's marketing, advertisement, or other promotion of items whose purchase and sale is restricted by the Protect Illinois Communities Act.
8. Piasa Armory's acquisition and disposition records in its ATF Bound Book (PIASA_000446-001706), including the processes for creating and maintaining those records.
9. The membership or involvement of Piasa Armory and/or its proprietor(s) in trade groups, advocacy groups, or other membership organizations.

CERTIFICATE OF SERVICE

The undersigned attorney certifies that a copy of the foregoing **Notice of Deposition of Plaintiff Piasa Armory, LLC** was served upon the individuals listed below by e-mail on May 13, 2024.

/s/ John Hazinski

John Hazinski

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Piasa Armory, LLC

Profit and Loss

January - December 2018

	TOTAL
Income	
30100 Sales	569,897.69
30110 Firearm Sales	60,327.19
30120 Parts Sales	8,555.24
30130 Ammo Sales	18,746.17
30140 Online Sales	194.20
30160 Merchandise Sales	26,342.24
30170 Consignment Sales	6,075.00
30180 Food & Beverage Sales	178.55
30195 Tax Exempt Sales	1,348.79
Total 30100 Sales	691,665.07
30200 Services	173,120.19
30210 Transfer Sales	3,200.00
30220 Gunsmithing Services	2,166.30
30230 Membership Fee	6,936.73
30240 Training Fees	32,752.60
30250 Gift Certificate Sales	1,060.00
30265 Rental Income	6,405.52
30270 Range Rental	19,569.55
Total 30200 Services	245,210.89
30300 Discounts given	-1,939.69
Unapplied Cash Payment Income	23,484.24
Total Income	\$958,420.51
Cost of Goods Sold	
40100 Cost of Goods Sold	28,900.84
40110 Purchases	598,644.37
40120 Supplies & Materials	15,651.73
40140 Freight & Delivery	1,611.32
40150 Other COGS	1,029.72
40170 Consignment Sales	22,335.94
Total 40100 Cost of Goods Sold	668,173.92
Total Cost of Goods Sold	\$668,173.92
GROSS PROFIT	\$290,246.59
Expenses	
50100 Advertising	7,519.09
50150 Credit Card Processing Fees	14,654.23
50300 Bank Charges	2,111.98
50350 Service Fees	4,072.00
50500 Utilities	16,115.12
50510 Telephone Expense	4,932.86
50600 Dues & Subscriptions	7,945.61

Cash Basis Thursday, April 11, 2024 02:00 PM GMT-05:00

1/3

PIASA_000437

EXHIBIT

2

Piasa Armory, LLC

Profit and Loss

January - December 2018

	TOTAL
50700 Freight & Delivery	988.02
50800 Insurance	
50810 Insurance - General Liability	3,488.33
Total 50800 Insurance	3,488.33
50900 Interest Expense	24,285.96
50950 Interest Expense - Other	6.82
51000 Office Expenses	2,309.37
51200 Legal & Professional Fees	175.00
51300 Meals and Entertainment	3,016.87
51400 Tools	614.46
51500 Other General and Admin Expenses	210.00
51600 Rent or Lease	60,019.00
51700 Repair & Maintenance	11,504.36
51800 Stationery & Printing	166.18
51900 Supplies	11,852.89
52000 Taxes & Licenses	125.00
52100 Travel	1,320.48
52200 Website Service Fees	3,336.74
52300 Charitable Contributions	1,600.00
52400 Training Materials and Supplies	3,876.59
52500 Uniform Expenses	1,026.18
52800 Cash Over/Short	379.20
53100 Equipment Rental	478.04
70000 Payroll Expenses	88,255.00
Taxes	
Federal Taxes (941/944)	3,371.28
Federal Unemployment (940)	64.92
IL Unemployment Tax	165.27
Total Taxes	3,601.47
Total 70000 Payroll Expenses	91,856.47
70010 Guaranteed Payments	22,300.00
70100 Payroll Tax Expenses	3,380.25
70110 Illinois Unemployment	231.99
70140 Federal Unemployment	236.99
Total 70100 Payroll Tax Expenses	3,849.23
Total Expenses	\$306,136.08
NET OPERATING INCOME	\$ -15,889.49
Other Income	
30400 Interest Income	1.59
90100 Other Income	181.80
Total Other Income	\$183.39

Piasa Armory, LLC

Profit and Loss

January - December 2018

	TOTAL
Other Expenses	
90200 Other Miscellaneous Expense	3,568.26
90210 Penalties & Settlements	307.00
Total Other Expenses	\$3,875.26
NET OTHER INCOME	\$ -3,691.87
NET INCOME	\$ -19,581.36

Piasa Armory, LLC

Profit and Loss

January - December 2019

	TOTAL
Income	
30100 Sales	615,477.50
30195 Tax Exempt Sales	32,302.52
Total 30100 Sales	647,780.02
30200 Services	246,705.84
30240 Training Fees	16,087.02
30265 Rental Income	4,800.00
Total 30200 Services	267,592.86
Unapplied Cash Payment Income	14,398.65
Total Income	\$929,771.53
Cost of Goods Sold	
40100 Cost of Goods Sold	26,097.31
40110 Purchases	523,774.14
40120 Supplies & Materials	12,916.56
40140 Freight & Delivery	3,264.80
40150 Other COGS	1,122.90
40160 Subcontractors	406.00
401700 Consignment Sales	39,193.77
Total 40100 Cost of Goods Sold	606,775.48
Total Cost of Goods Sold	\$606,775.48
GROSS PROFIT	\$322,996.05
Expenses	
50100 Advertising	2,318.33
50150 Credit Card Processing Fees	15,307.77
50300 Bank Charges	4,155.68
50350 Service Fees	3,335.07
50500 Utilities	18,267.03
50510 Telephone Expense	5,582.41
50600 Dues & Subscriptions	4,060.15
50800 Insurance	
50810 Insurance - General Liability	3,140.46
Total 50800 Insurance	3,140.46
50900 Interest Expense	11,940.68
51000 Office Expenses	3,976.12
51100 Job Materials	60.60
51200 Legal & Professional Fees	873.75
51300 Meals and Entertainment	2,294.45
51400 Tools	969.97
51500 Other General and Admin Expenses	1,627.95
51600 Rent or Lease	67,474.00
51700 Repair & Maintenance	4,713.59

Piasa Armory, LLC

Profit and Loss

January - December 2019

	TOTAL
51800 Stationery & Printing	225.51
51900 Supplies	11,645.57
52000 Taxes & Licenses	2,493.56
52100 Travel	2,437.89
52200 Website Service Fees	1,222.17
52300 Charitable Contributions	2,110.00
52400 Training Materials and Supplies	1,849.02
52500 Uniform Expenses	681.65
52800 Cash Over/Short	-291.77
53100 Equipment Rental	170.95
70000 Payroll Expenses	100,893.00
Taxes	
Federal Taxes (941/944)	7,718.32
Federal Unemployment (940)	320.94
IL Unemployment Tax	399.91
Total Taxes	8,439.17
Total 70000 Payroll Expenses	109,332.17
70010 Guaranteed Payments	32,000.00
Total Expenses	\$313,974.73
NET OPERATING INCOME	\$9,021.32
Other Income	
90100 Other Income	497.35
Total Other Income	\$497.35
Other Expenses	
90200 Other Miscellaneous Expense	1.99
90210 Penalties & Settlements	2,706.68
Total Other Expenses	\$2,708.67
NET OTHER INCOME	\$ -2,211.32
NET INCOME	\$6,810.00

Piasa Armory, LLC

Profit and Loss

January - December 2020

	TOTAL
Income	
30100 Sales	602,999.99
30196 Resale Items	126,999.05
Total 30100 Sales	729,999.04
30200 Services	219,233.92
30240 Training Fees	17,490.84
30265 Rental Income	26,537.37
Total 30200 Services	263,262.13
Unapplied Cash Payment Income	7,220.75
Total Income	\$1,000,481.92
Cost of Goods Sold	
40100 Cost of Goods Sold	-1,877.13
40110 Purchases	647,375.10
40120 Supplies & Materials	6,486.92
40130 Labor	500.00
40140 Freight & Delivery	4,589.00
40150 Other COGS	376.79
40170 Consignment Sales	62,007.05
Total 40100 Cost of Goods Sold	719,457.73
Total Cost of Goods Sold	\$719,457.73
GROSS PROFIT	\$281,024.19
Expenses	
50100 Advertising	811.60
50150 Credit Card Processing Fees	19,343.29
50300 Bank Charges	2,031.74
50350 Service Fees	4,268.84
50500 Utilities	15,878.16
50510 Telephone Expense	5,676.42
50600 Dues & Subscriptions	6,588.47
50800 Insurance	497.00
50810 Insurance - General Liability	3,567.30
Total 50800 Insurance	4,064.30
50900 Interest Expense	5,940.42
51000 Office Expenses	989.28
51200 Legal & Professional Fees	538.00
51300 Meals and Entertainment	2,977.74
51400 Tools	848.99
51500 Other General and Admin Expenses	171.00
51600 Rent or Lease	69,015.00
51700 Repair & Maintenance	11,812.95
51900 Supplies	12,872.74

Piasa Armory, LLC

Profit and Loss

January - December 2020

	TOTAL
52000 Taxes & Licenses	1,172.00
52100 Travel	789.39
52200 Website Service Fees	165.00
52300 Charitable Contributions	1,955.00
52400 Training Materials and Supplies	636.24
52500 Uniform Expenses	1,562.54
52800 Cash Over/Short	1,057.02
53100 Equipment Rental	494.59
70000 Payroll Expenses	123,392.30
Taxes	
Federal Taxes (941/944)	9,538.14
Federal Unemployment (940)	337.74
IL Unemployment Tax	589.47
Total Taxes	10,465.35
Total 70000 Payroll Expenses	133,857.65
70010 Guaranteed Payments	45,550.00
Total Expenses	\$351,068.37
NET OPERATING INCOME	\$ -70,044.18
Other Income	
90100 Other Income	22,912.00
Total Other Income	\$22,912.00
Other Expenses	
90210 Penalties & Settlements	48.98
Total Other Expenses	\$48.98
NET OTHER INCOME	\$22,863.02
NET INCOME	\$ -47,181.16

Piasa Armory, LLC

Profit and Loss

January - December 2021

	TOTAL
Income	
30100 Sales	686,404.85
30130 Ammo Sales	12,610.00
30160 Merchandise Sales	6,560.00
30196 Resale Items	4,497.86
Total 30100 Sales	710,072.71
30200 Services	237,793.05
30240 Training Fees	3,230.00
30265 Rental Income	25,000.00
Total 30200 Services	266,023.05
Total Income	\$976,095.76
Cost of Goods Sold	
40100 Cost of Goods Sold	11,992.12
40110 Purchases	511,000.09
Purchases	7,843.50
Total 40110 Purchases	518,843.59
40120 Supplies & Materials	17,022.03
40140 Freight & Delivery	5,115.06
40150 Other COGS	179.33
401700 Consignment Sales	88,445.96
Total 40100 Cost of Goods Sold	641,598.09
Total Cost of Goods Sold	\$641,598.09
GROSS PROFIT	\$334,497.67
Expenses	
50100 Advertising	1,115.65
50150 Credit Card Processing Fees	17,322.49
50300 Bank Charges	2,151.09
50350 Service Fees	6,479.60
50500 Utilities	17,559.38
50510 Telephone Expense	5,673.55
50600 Dues & Subscriptions	9,284.45
50800 Insurance	504.00
50810 Insurance - General Liability	3,701.50
Total 50800 Insurance	4,205.50
50900 Interest Expense	10,445.34
51000 Office Expenses	2,613.59
51200 Legal & Professional Fees	858.50
51300 Meals and Entertainment	1,896.70
51500 Other General and Admin Expenses	28.95
51600 Rent or Lease	61,450.00
51700 Repair & Maintenance	16,799.07

Piasa Armory, LLC

Profit and Loss

January - December 2021

	TOTAL
51900 Supplies	14,132.67
52000 Taxes & Licenses	1,440.92
52100 Travel	4,237.10
52300 Charitable Contributions	2,956.03
52400 Training Materials and Supplies	1,489.05
52500 Uniform Expenses	3,813.01
52800 Cash Over/Short	647.09
70000 Payroll Expenses	124,195.50
Taxes	
Federal Taxes (941/944)	9,500.97
Federal Unemployment (940)	348.97
IL Unemployment Tax	623.52
Total Taxes	10,473.46
Total 70000 Payroll Expenses	134,668.96
70010 Guaranteed Payments	45,000.00
Total Expenses	\$366,268.69
NET OPERATING INCOME	\$ -31,771.02
NET INCOME	\$ -31,771.02

Piasa Armory, LLC

Profit and Loss

January - December 2022

	TOTAL
Income	
30100 Sales	574,163.62
30196 Resale Items	560.00
Total 30100 Sales	574,723.62
30200 Services	285,336.08
30265 Rental Income	7,300.00
Total 30200 Services	292,636.08
Total Income	\$867,359.70
Cost of Goods Sold	
40100 Cost of Goods Sold	6,601.72
40110 Purchases	360,482.00
40120 Supplies & Materials	21,531.70
40140 Freight & Delivery	14,795.14
401700 Consignment Sales	64,031.43
Total 40100 Cost of Goods Sold	467,441.99
Total Cost of Goods Sold	\$467,441.99
GROSS PROFIT	\$399,917.71
Expenses	
50100 Advertising	202.71
50150 Credit Card Processing Fees	17,939.17
50300 Bank Charges	4,115.03
50350 Service Fees	2,040.47
50500 Utilities	22,648.81
50510 Telephone Expense	6,243.53
50600 Dues & Subscriptions	8,623.18
50800 Insurance	1,271.00
50810 Insurance - General Liability	5,477.92
Total 50800 Insurance	6,748.92
50900 Interest Expense	8,471.61
51000 Office Expenses	1,877.27
51200 Legal & Professional Fees	1,911.89
51300 Meals and Entertainment	1,961.61
51400 Tools	155.00
51600 Rent or Lease	69,900.00
51700 Repair & Maintenance	3,213.57
51900 Supplies	17,086.21
52000 Taxes & Licenses	2,563.94
52100 Travel	6,436.32
52300 Charitable Contributions	1,809.66
52400 Training Materials and Supplies	1,503.43
52500 Uniform Expenses	704.58

Piasa Armory, LLC

Profit and Loss

January - December 2022

	TOTAL
52800 Cash Over/Short	-560.69
53100 Equipment Rental	740.00
70000 Payroll Expenses	137,822.00
Taxes	
Federal Taxes (941/944)	10,543.40
Federal Unemployment (940)	338.35
IL Unemployment Tax	679.59
Total Taxes	11,561.34
Total 70000 Payroll Expenses	149,383.34
70010 Guaranteed Payments	42,000.00
Total Expenses	\$377,719.56
NET OPERATING INCOME	\$22,198.15
Other Income	
90100 Other Income	1,250.00
Total Other Income	\$1,250.00
NET OTHER INCOME	\$1,250.00
NET INCOME	\$23,448.15

Piasa Armory, LLC

Profit and Loss

January - December 2023

	TOTAL
Income	
30100 Sales	528,530.93
30140 Online Sales	465.23
Total 30100 Sales	528,996.16
30200 Services	317,152.78
30240 Training Fees	570.55
30265 Rental Income	7,543.05
Total 30200 Services	325,266.38
Total Income	\$854,262.54
Cost of Goods Sold	
40100 Cost of Goods Sold	-7,416.97
40110 Purchases	468,868.91
40120 Supplies & Materials	9,348.42
40140 Freight & Delivery	115.00
401700 Consignment Sales	68,120.21
Total 40100 Cost of Goods Sold	539,035.57
Total Cost of Goods Sold	\$539,035.57
GROSS PROFIT	\$315,226.97
Expenses	
50100 Advertising	214.06
50150 Credit Card Processing Fees	17,427.93
50300 Bank Charges	2,743.82
50350 Service Fees	584.95
50500 Utilities	26,806.84
50510 Telephone Expense	6,026.37
50600 Dues & Subscriptions	10,194.31
50800 Insurance	1,983.65
50810 Insurance - General Liability	1,790.50
Total 50800 Insurance	3,774.15
50900 Interest Expense	16,409.53
51000 Office Expenses	147.79
51200 Legal & Professional Fees	40,937.18
51210 Personnel Training	1,300.00
Total 51200 Legal & Professional Fees	42,237.18
51300 Meals and Entertainment	1,084.86
51400 Tools	309.45
51600 Rent or Lease	73,839.19
51700 Repair & Maintenance	1,205.21
51900 Supplies	17,916.49
52000 Taxes & Licenses	205.44
52100 Travel	5,952.98

Piasa Armory, LLC

Profit and Loss

January - December 2023

	TOTAL
52300 Charitable Contributions	836.26
52400 Training Materials and Supplies	1,638.79
52500 Uniform Expenses	48.06
52800 Cash Over/Short	-665.51
53100 Equipment Rental	1,376.68
70000 Payroll Expenses	128,485.50
Taxes	
Federal Taxes (941/944)	9,829.13
Federal Unemployment (940)	521.21
IL Unemployment Tax	805.49
Total Taxes	11,155.83
Total 70000 Payroll Expenses	139,641.33
70010 Guaranteed Payments	39,724.00
Total Expenses	\$409,680.16
NET OPERATING INCOME	\$ -94,453.19
Other Income	
90100 Other Income	101,984.43
Total Other Income	\$101,984.43
NET OTHER INCOME	\$101,984.43
NET INCOME	\$7,531.24

GENERAL RESPONSE

1. Responding Party has not yet completed the investigation of the facts and discovery relating to this case. It is anticipated that further factual investigation, legal research, factual and legal analysis, and discovery could lead to additions, changes, and/or variations with respect to these objections and responses. Responding Party thus reserves the right to amend, supplement, or otherwise revise each of the responses given as warranted by information learned through other proceedings connected with this action, or otherwise.

2. Each response is made without waiver of any objection as to privilege, confidentiality, competence, relevance, materiality, propriety, and admissibility, and of any and all other objections on any grounds that would require exclusion from evidence of any statement herein, any documents produced, or any interrogatory asked of, or any statements contained in or made by, any witness while present and testifying in court, all of which actions and grounds are expressly reserved and may be interposed at trial.

3. No incidental or implied admissions are intended by these responses. The fact that Responding Party has responded or objected to any interrogatory shall not be construed as an admission that Responding Party accepts or admits the existence of any documents or facts set forth or assumed by such interrogatory or that such response or objection constitutes admissible evidence.

4. The fact that Responding Party has answered part of any interrogatory is not intended to be and shall not be construed as a waiver by Responding Party of any part of any objection to any interrogatory. Further, Responding Party makes the following objections and responses without agreeing or implying that any of the interrogatories are relevant to the subject matter of this case.

GENERAL OBJECTION

1. Responding Party generally objects to the interrogatories, instructions, and definitions contained therein, to the extent they purport to impose obligations on Responding Party other than those imposed by the Federal Rules of Civil Procedure and the Local Rules of

the United States District Court for the Southern District of Illinois.

2. Responding Party also objects to the interrogatories to the extent that they seek information or materials that are protected by the attorney-client privilege (including, but not limited to, the joint defense and common interest privileges) and/or attorney work product doctrine. Responding Party will not disclose any privileged or confidential information in its response to the Interrogatories.

RESPONSES TO INTERROGATORIES

Interrogatory No. 1:

Identify all persons with knowledge relating to the allegations in the FFL Plaintiffs' Complaint and any declaration filed on your behalf in this or a related case, and all persons whom you may call to testify at a trial or evidentiary hearing in this lawsuit, including a description of the information known by each such person.

Response to Interrogatory No. 1:

As to the allegations of the Complaint specifically, Responding Party objects to this request on the ground that it is overbroad, oppressive, and unduly burdensome, as it would require a laborious and time-consuming search for information disproportionate to the scope of issues relevant to this lawsuit. *IBP, Inc. v. Mercantile Bank of Topeka*, 179 F.R.D. 316, 321 (D. Kan. 1988). Undoubtedly, thousands of persons have "knowledge" relating to the Protect Illinois Communities Act ("PICA"). The information's probability of providing probative evidence is far outweighed by the burden of producing the requested information.

Responding Party objects to this interrogatory because it calls for privileged information within the attorney-client privilege. Relatedly, Responding Party also objects because this request calls for the disclosure of attorney work product prepared in anticipation of litigation or for trial.

Responding Party objects to this interrogatory because it contains a compound request. It is essentially four interrogatories in one.

Responding Party objects to this interrogatory because it is vague and ambiguous as to

the phrase “relating to the allegations in the FFL Plaintiffs’ Complaint and any declaration filed on your behalf in this case.”

Notwithstanding these objections, and without waiving them, Responding Party answers as follows:

Responding Party’s Initial Disclosures contain the requested information. In addition, Responding Party expects to call expert witnesses whose identities were recently disclosed to the State.

Interrogatory No. 2:

Identify each item regulated by the Protect Illinois Communities Act (Illinois Public Act 102-1116) for which you contend the Act’s regulations violate the Second Amendment, providing the manufacturer and model or product name for each such item.

Response to Interrogatory No. 2:

Responding Party objects to this interrogatory because it asks for a compilation, summary, or analysis of documents or information. Creating such a compilation or summary would require undue effort and is beyond the scope of standard discovery requests.

Responding Party objects that the request is unduly burdensome because PICA prohibits firearms not just by make and model, but also by features, and the features themselves, which potentially reaches thousands of firearm and attachment make and models.

Responding Party objects that the request is irrelevant to the extent it seeks the make and model of every item that PICA regulates because Responding Party challenges PICA’s broad categories of restricted items, not particular makes and models in those categories because any make and model falling within any of those categories would necessarily be contemplated.

Responding Party objects to this interrogatory because it contains a compound request. It is essentially hundreds or thousands of interrogatories in one.

Responding Party objects that the request seeks information equally available to Requesting Party, which wrote the law and is tasked with its enforcement.

Responding Party objects that the request seeks a legal conclusion.

Responding Party objects that the request asks Responding Party to interpret PICA's vague language in identifying all items it covers, which is not possible.

Notwithstanding these objections, and without waiving them, Responding Party answers as follows:

Responding Party contends that the Second Amendment protects all of the firearms PICA bans, except that for the purposes of this litigation Responding Party does not challenge PICA's restrictions as to grenade launchers, and shotguns with a revolving cylinder.

Interrogatory No. 3:

Identify all firearms, ammunition feeding devices, and/or firearm attachments you offered for sale as of January 9, 2023.

Response to Interrogatory No. 3:

Responding Party offered for sale numerous items banned by PICA due to prohibited features (aside from shotguns with a revolving cylinder, and grenade launchers). These include semiautomatic rifles with the prohibited features, handguns with threaded barrels, semiautomatic shotguns with pistol grips and detachable magazines, and .50 BMG rifles. Responding Party also sold attachments for each of these types of firearms.

Interrogatory No. 4:

Identify all items you have ceased offering for sale in Illinois to non-exempt purchasers¹ due to restrictions under the Protect Illinois Communities Act (Illinois Public Act 102-111), as well as any items you would offer for sale but for restrictions under the Act.

Response to Interrogatory No. 4:

Responding Party has ceased offering for sale in Illinois to non-exempt purchasers all items that PICA restricts. But for PICA, Responding Party would continue to offer for sale every item that is described in response to Interrogatory No. 3.

¹ "Non-exempt purchasers" means individuals or entities who are not exempt from restrictions on purchase under the Protect Illinois Communities Act (Illinois Public Act 102-1116), as specified in 720 ILCS 5/24-1.9(e) and 720 ILCS 5/24-1.10(e)

Interrogatory No. 5:

For each year from 2020 through 2023, identify what proportion of the total firearms you sold were firearms of the types regulated by the Protect Illinois Communities Act (Illinois Public Act 102-1116).

Response to Interrogatory No. 5:

Responding Party estimates the total was approximately 20-40% of its business.

Interrogatory No. 6:

For each firearm identified in response to Interrogatories #3 and #4, above, that is regulated by the Protect Illinois Communities Act (Illinois Public Act 102-1116) but is not listed in 720 ILCS 5/24-1.9(a)(1)(J), (K), or (L), identify the specific provision(s) of the Act that restrict each item.

Response to Interrogatory No. 6:

Responding Party objects to the extent this request calls for the disclosure of attorney work product prepared in anticipation of litigation or for trial.

Responding Party objects that the request seeks information equally available to Requesting Party.

Responding Party objects that the request seeks a legal conclusion.

Responding Party objects that the request prematurely seeks expert witness opinion.

Interrogatory No. 7:

Describe with specificity all ways in which you contend you have been injured or will be injured by the enactment and/or enforcement of the Protect Illinois Communities Act (Illinois Public Act 102-1116).

Response to Interrogatory No. 7:

Responding Party is unable to continue to sell some of the most popular firearms in the country, which has cost it a huge proportion of its business.

Interrogatory No. 8:

For each person you have disclosed in response to Interrogatory #1, above, or in your disclosures under Federal Rule of Civil Procedure 26(a), state whether you may rely upon that person to present opinion testimony under Federal Rule of Evidence 702, 703, or 705, and, if so, specifically describe the subject matter of their opinion testimony and their qualifications to testify as an expert.

Response to Interrogatory No. 8:

Responding Party may rely on testimony from Scott Pulaski, a longtime federally licensed firearm dealer, about the nature of the firearms market in Illinois before and after the adoption of PICA.

Interrogatory No. 9:

Identify all lawsuits or other court proceedings to which you have been a party, stating for each the case name, case number, and court adjudicating the case.

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Response to Interrogatory No. 9:

PIASA ARMORY LLC Vs. ROUL KWAME IN HIS OFFICIAL CAP, Case No.
2023LA001129 in Madison County, Illinois state court.

Dated: April 3, 2024

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s/ Sean A. Brady

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VERIFICATION

I, Scott Pulaski, am a Managing Member of Piasa Armory, Plaintiff in the above-entitled action. I have read the foregoing PLAINTIFF PIASA ARMORY'S RESPONSE TO STATE DEFENDANTS' INTERROGATORIES, SET ONE, and know the contents thereof. The same is true of my own knowledge, except as to any matters stated therein on information and belief, and as to such matters I believe them to be true.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this verification was executed on April 3, 2024, in

_____.

Scott Pulaski

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2024, an electronic PDF of PLAINTIFF PIASA ARMORY'S RESPONSE TO STATE DEFENDANTS' INTERROGATORIES, SET ONE was served by electronic mail on the following parties:

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Dated: April 3, 2024

s/ Sean A. Brady

Sean A. Brady

VERIFICATION

I, Scott Pulaski, am a Managing Member of Piasa Armory, Plaintiff in the above-entitled action. I have read the foregoing PLAINTIFF PIASA ARMORY'S RESPONSE TO STATE DEFENDANTS' INTERROGATORIES, SET ONE, and know the contents thereof. The same is true of my own knowledge, except as to any matters stated therein on information and belief, and as to such matters I believe them to be true.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this verification was executed on April 3, 2024, in Alton, Illinois.



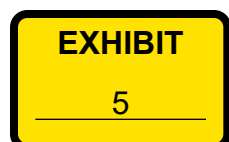
Scott Pulaski

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

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

**PLAINTIFF PIASA ARMORY’S SUPPLEMENTAL RESPONSE TO STATE
DEFENDANTS’ INTERROGATORIES, SET ONE**

Under Rule 33 of the Federal Rules of Civil Procedure, Plaintiff Piasa Armory (“Responding Party”), hereby supplements its response to State Defendants’ (“Propounding Party”) first set of interrogatories, as follows:



GENERAL RESPONSE

1. Responding Party has not yet completed the investigation of the facts and discovery relating to this case. It is anticipated that further factual investigation, legal research, factual and legal analysis, and discovery could lead to additions, changes, and/or variations with respect to these objections and responses. Responding Party thus reserves the right to amend, supplement, or otherwise revise each of the responses given as warranted by information learned through other proceedings connected with this action, or otherwise.

2. Each response is made without waiver of any objection as to privilege, confidentiality, competence, relevance, materiality, propriety, and admissibility, and of any and all other objections on any grounds that would require exclusion from evidence of any statement herein, any documents produced, or any interrogatory asked of, or any statements contained in or made by, any witness while present and testifying in court, all of which actions and grounds are expressly reserved and may be interposed at trial.

3. No incidental or implied admissions are intended by these responses. The fact that Responding Party has responded or objected to any interrogatory shall not be construed as an admission that Responding Party accepts or admits the existence of any documents or facts set forth or assumed by such interrogatory or that such response or objection constitutes admissible evidence.

4. The fact that Responding Party has answered part of any interrogatory is not intended to be and shall not be construed as a waiver by Responding Party of any part of any objection to any interrogatory. Further, Responding Party makes the following objections and responses without agreeing or implying that any of the interrogatories are relevant to the subject matter of this case.

GENERAL OBJECTION

1. Responding Party generally objects to the interrogatories, instructions, and definitions contained therein, to the extent they purport to impose obligations on Responding Party other than those imposed by the Federal Rules of Civil Procedure and the Local Rules of

the United States District Court for the Southern District of Illinois.

2. Responding Party also objects to the interrogatories to the extent that they seek information or materials that are protected by the attorney-client privilege (including, but not limited to, the joint defense and common interest privileges) and/or attorney work product doctrine. Responding Party will not disclose any privileged or confidential information in its response to the Interrogatories.

SUPPLEMENTAL RESPONSES TO INTERROGATORIES

Interrogatory No. 2:

Identify each item regulated by the Protect Illinois Communities Act (Illinois Public Act 102-1116) for which you contend the Act's regulations violate the Second Amendment, providing the manufacturer and model or product name for each such item.

Supplemental Response to Interrogatory No. 2:

Responding Party objects to this interrogatory because it asks for a compilation, summary, or analysis of documents or information. Creating such a compilation or summary would require undue effort and is beyond the scope of standard discovery requests.

Responding Party objects that the request is unduly burdensome because PICA prohibits firearms not just by make and model, but also by features, and the features themselves, which potentially reaches thousands of firearm and attachment make and models.

Responding Party objects that the request is irrelevant to the extent it seeks the make and model of every item that PICA regulates because Responding Party challenges PICA's broad categories of restricted items, not particular makes and models in those categories because any make and model falling within any of those categories would necessarily be contemplated.

Responding Party objects to this interrogatory because it contains a compound request. It is essentially hundreds or thousands of interrogatories in one.

Responding Party objects that the request seeks information equally available to Requesting Party, which wrote the law and is tasked with its enforcement.

Responding Party objects that the request seeks a legal conclusion.

Responding Party objects that the request asks Responding Party to interpret PICA's vague language in identifying all items it covers, which is not possible.

Notwithstanding these objections, and without waiving them, Responding Party answers as follows:

Responding Party contends that the Second Amendment protects all of the following firearms that Illinois's PICA restricts as "assault weapons":

- a. semiautomatic rifles that accept detachable magazines and have one, multiple, or all of the following features:
 - i. a pistol grip;
 - ii. thumbhole stock;
 - iii. a protruding grip that can be held by the non-trigger hand;
 - iv. an adjustable, folding, or detachable stock;
 - v. a flash suppressor; and
 - vi. a shroud attached to the barrel or that partially or completely encircles the barrel, allowing the bearer to hold the firearm with the non-trigger hand without being burned, but excluding a slide that encloses the barrel;including, to the extent they meet the above description, any of the rifles listed by make and model in 720 Ill. Comp. Stat. Ann. 5/24-1.9, subd. (a)(1)(J), and their copies, duplicates, variants, or altered facsimiles with the capability of any such rifle;
- b. SKS rifles with a detachable magazine (with or without the features listed in 720 Ill. Comp. Stat. Ann. 5/24-1.9, subd. (a)(1)(A));
- c. semiautomatic rifles that have a fixed magazine with the capacity to accept more than 10 rounds;
- d. semiautomatic pistols that accept detachable magazines and have one, multiple, or all of the following features:
 - i. a threaded barrel;

- ii. a second pistol grip or another feature capable of functioning as a protruding grip that can be held by the non-trigger hand;
 - iii. a shroud attached to the barrel or that partially or completely encircles the barrel, allowing the bearer to hold the firearm with the non-trigger hand without being burned, but excluding a slide that encloses the barrel;
 - iv. a flash suppressor;
 - v. the capacity to accept a detachable magazine at some location outside of the pistol grip; and
 - vi. a buffer tube that protrudes horizontally behind the pistol grip;
- including, to the extent they meet the above description, any of the pistols listed by make and model in 720 Ill. Comp. Stat. Ann. 5/24-1.9, subd. (a)(1)(K), including their copies, duplicates, variants, or altered facsimiles with the capability of any such pistol;
- e. semiautomatic pistols that have a fixed magazine with the capacity to accept more than 15 rounds;
 - f. semiautomatic shotguns that have any one of the following features:
 - i. a pistol grip;
 - ii. a thumbhole stock;
 - iii. a folding stock;
 - iv. a feature capable of functioning as a protruding grip that can be held by the non-trigger hand;
 - v. the capacity to accept a detachable magazine.

including, to the extent they meet the above description, any of the shotguns listed by make and model in 720 Ill. Comp. Stat. Ann. 5/24-1.9, subd. (a)(1)(L), including their copies, duplicates, variants, or altered facsimiles with the capability of any such shotgun;

- g. semiautomatic shotguns that have a fixed magazine with the capacity of more than 5 rounds;
- h. rifles chambered for .50 BMG ammunition;
- i. .50 BMG ammunition;
- j. semiautomatic firearms that have the capacity to accept a belt ammunition feeding device;
- k. individual parts that when affixed to a rifle, pistol, or shotgun, would bring the respective firearm into PICA's definition of an "assault weapon," including, but not limited to: pistol grips; flash suppressors; barrel shrouds; adjustable, telescoping, or removal stocks; thumbhole stocks; and a part capable of functioning as a protruding grip that can be held by the non-trigger hand

For purposes of this litigation, however, Responding Party does not challenge PICA's restrictions as to grenade launchers or shotguns with a revolving cylinder that do not meet an exception under PICA's definition of "assault weapon" in 720 Ill. Comp. Stat. Ann. 5/24-1.9, subd. (a)(2).

Interrogatory No. 3:

Identify all firearms, ammunition feeding devices, and/or firearm attachments you offered for sale as of January 9, 2023.

Supplemental Response to Interrogatory No. 3:

Responding Party offered for sale numerous items banned by PICA due to prohibited features (aside from shotguns with a revolving cylinder, and grenade launchers). These include semiautomatic rifles with the prohibited features, handguns with threaded barrels, semiautomatic shotguns with pistol grips and detachable magazines, and .50 BMG rifles. Responding Party also sold attachments for each of these types of firearms. See records produced in response to Requests for Production numbers 29, 33, and 36.

///

///

Interrogatory No. 7:

Describe with specificity all ways in which you contend you have been injured or will be injured by the enactment and/or enforcement of the Protect Illinois Communities Act (Illinois Public Act 102-1116).

Supplemental Response to Interrogatory No. 7:

PICA precludes Responding Party from selling to nonexempt purchasers^[1] the firearms, ammunition, and parts identified in its supplemental response to Interrogatory No. 2 above. Prior to PICA taking effect, Responding Party had sold items falling within most, if not all, of those firearm, ammunition, and part categories. See Responding Party’s Supplemental Response to Interrogatories Nos. 3 and 5 above. Some of those items are among the most popular firearms and parts in the country and ones that Responding Party generally had in inventory prior to PICA taking effect. While some of the items it did not generally have as inventory, as part of its business, Responding Party has always tried to accommodate its customers seeking specific items. Additionally, Responding Party often acquires firearm/part collections in bulk, which may include items it might normally carry but that it would offer for sale when acquired. The inability to offer those items to its customers, due to PICA, has caused Responding Party to lose a significant amount of revenue. But for PICA being in effect, Responding Party would sell to members of the general public each of the items identified in response to Interrogatory No. 2 above that PICA currently prohibits it from selling.

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^[1] “Non-exempt purchasers” means individuals or entities not exempt from restrictions on purchase or possession under the Protect Illinois Communities Act (Illinois Public Act 102-1116), as specified in 720 ILCS 5/24-1.9(e) and 720 ILCS 5/24-1.10(e)

Dated: May 24, 2024

s/ Sean A. Brady

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VERIFICATION

I, Scott Pulaski, am a Managing Member of Piasa Armory, Plaintiff in the above-titled action. I have read the foregoing PLAINTIFF PIASA ARMORY'S SUPPLEMENTAL RESPONSE TO STATE DEFENDANTS' INTERROGATORIES, SET ONE, and know the contents thereof. The same is true of my own knowledge, except as to any matters stated therein on information and belief, and as to such matters I believe them to be true.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this verification was executed on May 24, 2024, in Alton, Illinois.



Scott Pulaski

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2024, an electronic PDF of PLAINTIFF PIASA ARMORY'S SUPPLEMENTAL RESPONSE TO STATE DEFENDANTS' INTERROGATORIES, SET ONE was served by electronic mail on the following parties:

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Dated: May 24, 2024

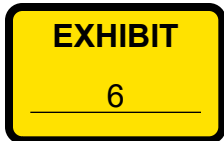
s/ Sean A. Brady

Sean A. Brady

Scott Pulaski

October 03, 2023

<p style="text-align: right;">Page 1</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS</p> <p>CALEB BARNETT, et al.,) Plaintiffs,) vs.) Case No. 3:23-cv-209-SPM Designated Lead Case KWAME RAOUL, et al.,) Defendants.)</p> <hr/> <p>DANE HARREL, et al.,) Plaintiffs,) vs.) Case No. 3:23-cv-141-SPM KWAME RAOUL, et al.,) Defendants.)</p> <hr/> <p>JEREMY W. LANGLEY, et al.,) Plaintiffs,) vs.) Case No. 3:23-cv-192-SPM KWAME RAOUL, et al.,) Defendants.)</p> <hr/> <p>FEDERAL FIREARMS LICENSEES OF) ILLINOIS, et al.,) Plaintiffs,) vs.) Case No. 3:23-cv-215-SPM JAY ROBERT "JB" PRITZKER, et al.,) Defendants.)</p> <p style="text-align: center;">VIDEOTAPED DEPOSITION OF SCOTT PULASKI Taken on behalf of the Defendants October 3rd, 2023 2:06 p.m. to 6:04 p.m. Jamie Jo Kinder, CCR 842, CSR 084.003306</p>	<p style="text-align: right;">Page 3</p> <p>1 Deposition Exhibit 17 115 2 (Exhibits retained by the Reporter and attached.) 3 (Exhibit 15 was marked and attached, but was not 4 introduced on the record.) 5 (The material quoted in the transcript was written verbatim 6 as read, and may not be a direct quote from the exhibit.) 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 2</p> <p style="text-align: center;">I N D E X</p> <p style="text-align: right;">Page</p> <p style="text-align: center;">EXAMINATION</p> <p>4 QUESTIONS BY MR. WELLS 7 5 QUESTIONS BY MR. MAAG 124 6 QUESTIONS BY MR. WELLS 157 7 8 9</p> <p style="text-align: center;">EXHIBITS</p> <p>11 Deposition Exhibit 1 28 12 Deposition Exhibit 2 29 13 Deposition Exhibit 3 42 14 Deposition Exhibit 4 43 15 Deposition Exhibit 5 49 16 Deposition Exhibit 6 53 17 Deposition Exhibit 7 55 18 Deposition Exhibit 8 59 19 Deposition Exhibit 9 66 20 Deposition Exhibit 10 69 21 Deposition Exhibit 11 77 22 Deposition Exhibit 12 82 23 Deposition Exhibit 13 99 24 Deposition Exhibit 14 104 25 Deposition Exhibit 16 112</p>	<p style="text-align: right;">Page 4</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS</p> <p>2 3 4 CALEB BARNETT, et al.,) Plaintiffs,) vs.) Case No. 3:23-cv-209-SPM Designated Lead Case 5 KWAME RAOUL, et al.,) Defendants.) 6 -----) and all related cases.) 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">VIDEOTAPED DEPOSITION OF WITNESS, SCOTT PULASKI, produced, sworn, and examined on the 3rd day of October, 2023, between the hours of 8:00 o'clock in the forenoon and 5:00 o'clock in the afternoon of that day, at the Office of the Illinois Attorney General, 201 West Pointe Drive, Suite 7, Swansea, IL, before Jamie Jo Kinder, Missouri CCR 842, Illinois CSR 084-003306, a Certified Shorthand Reporter within and for the State of Illinois, in a certain cause now pending in the United States District Court for the Southern District of Illinois.</p>



Page 5

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Page 6

1 (Deposition commenced at 2:06 p.m.)

2 IT IS HEREBY STIPULATED AND AGREED, by and

3 between counsel for Plaintiffs and counsel for Defendants,

4 that the videotaped deposition of SCOTT PULASKI may be taken

5 in shorthand by Jamie Jo Kinder, CCR, CSR, a notary public

6 and shorthand reporter, and afterwards transcribed into

7 typewriting; and the signature of the witness is expressly

8 waived.

9 *****

10 THE VIDEOGRAPHER: We are on the record.

11 Today's date is October 3rd, 2023. The time now is 2:06.

12 This is the video-recorded deposition of Scott Pulaski in

13 the matter of Caleb Barnett, et al., v Kwame Raoul, et al.,

14 Case No. 3:23-cv-192-SPM in the United States District

15 Court for the Southern District of Illinois.

16 This deposition is being held at 201 West

17 Pointe Drive. The reporter's name is Jamie Kinder. My

18 name is Ken Carden. I'm the legal videographer.

19 Would the attorneys present please introduce

20 themselves and the parties they represent.

21 MR. WELLS: Sure. This is Christopher Wells

22 on behalf of the State defendants.

23 MR. MAAG: Thomas Maag, M-A-A-G, on the

24 Langley plaintiffs.

25 MS. HELFRICH: Gretchen Helfrich on behalf of

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1 State defendants.

2 THE VIDEOGRAPHER: Would the court reporter

3 please swear in the witness.

4 (Witness sworn in.)

5 MR. WELLS: I'll just make the note again,

6 that this is specifically in the Langley versus Kelly case,

7 which is Case No. 3:23-cv-192-SPM, also in the Southern

8 District of Illinois.

9 As I noted in the prior deposition, we're

10 taking this deposition in light of the Langley plaintiffs

11 having filed a motion for summary judgment on their two

12 vagueness claims. The State defendants reserve their

13 rights to seek additional discovery and potentially to take

14 additional depositions, including a second deposition of

15 this witness, related to other claims that have been

16 asserted in Langley and Barnett and the consolidated

17 actions there. So just make that note for the record.

18 With that reservation of rights, we're going

19 to proceed with this deposition.

20 *****

21 SCOTT PULASKI,

22 of lawful age, being produced, sworn and examined on

23 behalf of the Defendants, deposes and says:

24 EXAMINATION

25 QUESTIONS BY MR. WELLS:

Page 8

1 Q Have you ever been deposed before,

2 Mr. Pulaski?

3 A I have not.

4 Q So I'm going to go through a couple of ground

5 rules.

6 A Sure.

7 Q Just to help this go as smoothly as possible.

8 You're under oath.

9 A Uh-huh (yes).

10 Q Just as if we were in court. There's a court

11 reporter who's here taking down everything that everybody

12 says as best she can. And in order to help her out, I'd

13 ask a couple of things. One, if you could wait for me to

14 finish a question before you start to answer. It's very

15 hard to do, and you will fail at it, but I'll try to remind

16 you as we go along to -- to wait for me to finish. Okay?

17 A Okay.

18 Q And I will also do the same. I will try to

19 wait for you to finish before interrupting you so that the

20 record can be clear. Is that fair?

21 A Yes.

22 Q If I ask you a question and you answer, I'm

23 going to assume you understood the question. If you don't

24 understand my question, then you can ask me to clarify.

25 A Okay.

Page 9

1 Q Mr. Maag may object from time to time.
 2 Generally speaking, if he objects, you still have to answer
 3 the question unless he specifically instructs you not to.
 4 There are a couple reasons why he might do that. If those
 5 come up, we'll deal with them. But generally speaking,
 6 even if he objects, you can still answer, if you
 7 understand. Fair enough?
 8 **A Okay.**
 9 Q If you need a break at any time, let me know.
 10 If you need a water, if you need to go to the restroom,
 11 it's not a problem. The only thing I'd ask is that if
 12 there's a question pending, I'd ask you to finish answering
 13 that question before we take a break.
 14 **A Certainly.**
 15 Q And just to be clear in terms of timing, so we
 16 started at 2:00 o'clock. I am hoping we can be out of here
 17 by 6:00, but that is -- depends on how things go obviously.
 18 Right?
 19 **A Okay.**
 20 Q Do you have any scheduled commitments that I
 21 should be aware of as we go through this?
 22 **A Just at 8:00 p.m.**
 23 Q Okay.
 24 MR. MAAG: If we're still here at 8:00 p.m.
 25 Q (By Mr. Wells) Yeah. Well, understood.

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1 Mr. Pulaski, are you -- And I apologize for the probing
 2 nature of this question, but are you on any medication
 3 today that would affect your ability to answer -- testify
 4 truthfully and completely?
 5 **A I am not.**
 6 Q Are you on any drugs or -- that would have a
 7 similar effect and impact your ability?
 8 **A No.**
 9 Q Just like practice, so you just got to wait.
 10 How about alcohol, are you on -- have you had
 11 any alcohol today?
 12 **A I have not.**
 13 Q Okay. So as I mentioned, the reason we're
 14 taking this deposition today is that the plaintiffs in the
 15 Langley case have filed a motion for summary judgment on
 16 two claims in that case. The Langley plaintiffs lawsuit
 17 challenges the constitutionality of Illinois Public Act
 18 102-1116. It's also known as the Protecting Illinois
 19 Communities Act. We can shorten that to PICA. I'm going
 20 to use PICA to refer to the statute that's being challenged
 21 in the Langley case. Is that fair?
 22 **A Yes.**
 23 Q And if I say PICA, you understand I'm talking
 24 about the Illinois statute that took effect on January 10,
 25 2023, and regulates assault weapons and -- and that sort of

Page 11

1 thing?
 2 **A I do.**
 3 Q You are not a plaintiff in the Langley case;
 4 correct?
 5 **A Correct.**
 6 Q What is your relationship to the Langley
 7 lawsuit?
 8 **A As an affidavit filer. Sorry. I don't know**
 9 **the term for that. But was asked to prepare an affidavit**
 10 **from Mr. Maag.**
 11 Q When did he ask you to prepare that affidavit?
 12 **A I do not remember the date for that.**
 13 Q Does Mr. Maag represent you in this case?
 14 **A In the Langley --**
 15 Q This case --
 16 **A In the Langley case, no.**
 17 Q Does he represent you in any other capacity?
 18 **A I believe we're in the early stages of another**
 19 **case, yes.**
 20 Q What is that other case?
 21 **A I do not recall the name of that case.**
 22 Q So Mr. Maag is your attorney in another
 23 lawsuit that you filed against officials in the State of
 24 Illinois; is that right?
 25 **A Correct.**

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1 Q When Mr. Maag asked you to write an affidavit,
 2 what -- what specifically were you asked to write an
 3 affidavit about?
 4 **A About the vagueness of the PICA and some of**
 5 **the lack of clarity of things in there.**
 6 Q And is Mr. Maag representing you today in this
 7 deposition?
 8 **A I don't understand. I'm sorry.**
 9 Q No, I understand.
 10 **A I'm new to depositions.**
 11 Q Is he serving as your attorney for purposes of
 12 this deposition today?
 13 **A Not to my knowledge.**
 14 MR. MAAG: As long as we're not touching on
 15 the other case.
 16 MR. WELLS: Which -- Oh, the other case that
 17 he's filed?
 18 MR. MAAG: Yes.
 19 MR. WELLS: For which you are his attorney?
 20 MR. MAAG: Correct.
 21 Q (By Mr. Wells) Okay. So in the Langley case
 22 today, are you testifying as an expert witness?
 23 **A I've never been qualified as an expert**
 24 **witness, but I have long experience in the field of**
 25 **firearms.**

Page 13

1 Q So are you being put forward as an expert
 2 witness in this case?
 3 **A I would presume so.**
 4 MR. WELLS: Is he being put forward as an
 5 expert witness in this case under Rule 702?
 6 MR. MAAG: I'd have to reread the rule for the
 7 particularities. I think it's more of a fact witness,
 8 but --
 9 MR. WELLS: Okay. So your understanding is
 10 that Mr. Pulaski is serving as a fact witness?
 11 MR. MAAG: Yes.
 12 MR. WELLS: Can we go off the record for just
 13 one second? Sorry.
 14 THE VIDEOGRAPHER: This is the videographer.
 15 We're going off the record. Time now is 2:14.
 16 (Whereupon, a short break was taken.)
 17 THE VIDEOGRAPHER: This is the videographer.
 18 We're back on the record. The time now is 2:16.
 19 Q (By Mr. Wells) I just want to clarify. So are
 20 you a plaintiff, you personally, a plaintiff in any other
 21 case?
 22 **A I am a plaintiff in the -- I'm sorry. I can't**
 23 **recall the -- the named plaintiff, but we are -- Piasa**
 24 **Armory is a plaintiff in one of these cases, which is my**
 25 **company.**

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1 Q (By Mr. Wells) Your company is a plaintiff?
 2 **A Correct. I -- I am specifically not.**
 3 **However, my company is.**
 4 Q You, as an individual, are not?
 5 **A Correct.**
 6 MR. MAAG: As far as I know, him as an
 7 individual is not.
 8 MR. WELLS: Okay. And who -- Here's my issue
 9 is, I -- to the extent he's a represented party in the
 10 other case, he needs to have his attorney from the other
 11 case here. He said he's at the end --
 12 **THE WITNESS: Chuck Michel is our other**
 13 **attorney.**
 14 MR. WELLS: My understanding coming to this
 15 was that you would be representing him for purposes of this
 16 deposition; is that right?
 17 MR. MAAG: Do you want me to represent you for
 18 purposes of this deposition?
 19 **THE WITNESS: I am comfortable with that.**
 20 MR. MAAG: Then so be it.
 21 MS. HELFRICH: Okay.
 22 Q (By Mr. Wells) And again, to be clear, in the
 23 Piasa Armory case where -- not the one where Mr. Maag
 24 represents you, but the -- the challenge to PICA?
 25 **A Correct.**

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1 Q The named plaintiff there, the named party, is
 2 the business Piasa Armory; correct?
 3 **A Correct.**
 4 Q And you, the individual, Scott Pulaski, are
 5 not a named plaintiff in that case; is that right?
 6 **A To my knowledge.**
 7 MR. MAAG: As far as I know, that's correct.
 8 Q (By Mr. Wells) And when you say Mr. Michel,
 9 Mr. Michel represents Piasa Armory; is that --
 10 **A All of -- I'm sorry. All of the plaintiffs.**
 11 Q Right. But including Piasa Armory; is that
 12 right?
 13 **A Correct.**
 14 Q And he exclusively represents Piasa Armory.
 15 He does not represent Scott Pulaski because Scott Pulaski
 16 is not in -- a plaintiff in that case; correct?
 17 **A Correct.**
 18 Q And you have indicated that Mr. Maag -- you
 19 agree to Mr. Maag being your counsel for purposes of this
 20 deposition today?
 21 **A Yes.**
 22 Q Can you tell me about how you went about
 23 preparing your January 23rd, 2023, affidavit, for the
 24 Langley case?
 25 **A Yeah. This was with assistance from Mr. Maag,**

Page 16

1 **Basically working together to provide and clarify**
 2 **information that would be of assistance to these cases.**
 3 Q How long have you known Mr. Maag?
 4 **A Several years.**
 5 Q How do you know him?
 6 **A Through our business.**
 7 Q What's your business?
 8 **A Piasa Armory.**
 9 Q And how did you come to know Mr. Maag?
 10 **A Mr. Maag has been a customer of ours for**
 11 **several years.**
 12 Q And when you say customer of yours, what do
 13 you mean?
 14 **A Has bought and sold various items and services**
 15 **from us.**
 16 Q And are you aware that Mr. Maag has a -- has a
 17 firearms business?
 18 **A I am.**
 19 Q Does his firearms business ever buy firearms
 20 from Piasa Armory?
 21 **A I do not believe it has.**
 22 Q So when you say Mr. Maag is a customer,
 23 Mr. Maag, in his individual capacity, as a customer, is
 24 that your understanding?
 25 **A Correct.**

Page 17

1 Q When you prepared your January 23, '23 --

2 January 23, 2023, affidavit in this case, did you consult

3 any written materials in preparing that affidavit?

4 **A No, I did not.**

5 Q What did you rely on?

6 **A Knowledge and assistance from Mr. Maag.**

7 Q How did you prepare your May 18, 2023,

8 statement pursuant to 28 USC 1746 for the Langley case?

9 **A In a similar manner.**

10 Q Are you being -- Or were you compensated for

11 preparing either of those affidavits?

12 **A No.**

13 Q Are you being paid for your testimony today?

14 **A I am not.**

15 Q In the lawsuit -- Let's see.

16 In the lawsuit in which you are -- in which

17 Piasa Armory is a named plaintiff, why did -- what's your

18 understanding as to why Piasa Armory brought that lawsuit?

19 **A To have the PICA ruled unconstitutional.**

20 Q What claims did Piasa Armory bring in that

21 lawsuit?

22 **A I did not write that or -- I'm not -- I don't**

23 **recall the specifics of that claim. But basically, that it**

24 **was a Second Amendment violation and inconsistent with the**

25 **ruling -- excuse me -- the ruling from the Supreme Court.**

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1 Q Did Piasa Armory, in that lawsuit, Federal

2 Firearms Licensee of Illinois versus Pritzker, No.

3 23-cv-215-SPM, assert that PICA was unconstitutionally

4 vague?

5 **A I -- I did not make that filing. I don't**

6 **recall if that was in that.**

7 Q What financial impact has PICA had on your

8 business at Piasa Armory?

9 **A We estimate approximately 50 percent loss of**

10 **revenue.**

11 Q You say estimate.

12 **A Yes.**

13 Q But you don't know for certain, though; right?

14 **A I do not.**

15 Q And what is the nature of Piasa Armory's

16 business, generally?

17 **A We sell firearms, provide training, gunsmith**

18 **services and a shooting range.**

19 Q So sell firearms, gunsmith, shooting range?

20 **A Yes, and also training. And, of course,**

21 **accessories, too.**

22 Q And you -- You personally hope that PICA is

23 struck down as unconstitutional; right?

24 **A Personally, yes.**

25 Q And in terms of Piasa Armory, you indicated

Page 19

1 that there may -- you estimate a 50 percent loss of

2 revenue. That's if PICA stays in effect; right?

3 **A That is as it has been since January and --**

4 **January 10th and going forward, I would assume so.**

5 Q And so if -- Excuse me. If PICA is struck

6 down, then you won't lose that estimated 50 percent of

7 revenue; is that right?

8 **A The revenue has already been lost for the time**

9 **that it's been active. However, we would assume to go back**

10 **to that standard revenue we had been seeing before.**

11 Q So is it fair to say whether or not PICA

12 remains in effect will affect your business?

13 **A Absolutely.**

14 Q What's the nature of your other lawsuit

15 against the -- against an Illinois gun regulation?

16 **A That was a challenge to the advertising rules**

17 **that were passed.**

18 Q What do you mean by the advertising rules?

19 **A Sorry. I don't recall the specifics of that**

20 **law. But basically, that you couldn't -- firearm**

21 **businesses or the industry could not advertise to -- in a**

22 **manner that enticed children to buy firearms, which is**

23 **already illegal.**

24 Q Are you a party in any other lawsuits?

25 **A No.**

Page 20

1 Q Have you -- other than the two lawsuits --

2 Excuse me.

3 Other than the one lawsuit that we just

4 described and the lawsuit involving Piasa Armory

5 challenging PICA, have you been involved in any other

6 lawsuits in your life?

7 **A Not to my knowledge.**

8 Q Have you testified as an expert in any other

9 lawsuits?

10 **A I have not. I have testified to the state at**

11 **a committee hearing, but have not been asked to testify as**

12 **an expert before.**

13 Q When did you testify to the state in a

14 committee hearing?

15 **A Before PICA was passed.**

16 Q What was the nature of your testimony?

17 **A It was explaining the nature of the FOID card,**

18 **what requirements individuals must go through to pass it,**

19 **and the process of buying a firearm in Illinois.**

20 Q How did you come to give that testimony?

21 **A I was asked by State Representative Elik.**

22 Q Spell that, please.

23 **A E-L-I-K.**

24 Q And the purpose of your testimony, as you

25 understood it, was to lobby against the passage of PICA?

Page 21

1 **A No. I was providing information on the**
 2 **current gun laws in Illinois and answering questions of the**
 3 **committee.**
 4 Q But was your personal hope that PICA would not
 5 be passed?
 6 **A At the time, that was not a potential. That**
 7 **was before PICA was even -- the process was started to pass**
 8 **PICA.**
 9 Q What -- What time period was that testimony?
 10 **A I believe it was in the fall before of -- of**
 11 **2022.**
 12 Q You understand that we're here talking about
 13 vagueness claims that have been brought by the Langley
 14 plaintiffs?
 15 **A Yes.**
 16 Q What's your understanding of what those claims
 17 are?
 18 **A That the -- That PICA is describing things so**
 19 **broadly that it lacks clarity enough to allow enforcement**
 20 **by the state and by dealers and causes a lot of difficulty**
 21 **in purchasing and acquiring goods and services.**
 22 Q Are you familiar with the claim in the Langley
 23 case that the difference between the magazine capacity
 24 limit as applicable to handguns versus long guns, are you
 25 familiar with that claim?

Page 22

1 **A Yes.**
 2 Q And what's your understanding of that claim?
 3 **A That there's no way to tell if a magazine is**
 4 **for a handgun or a long gun. There's no exclusivity on**
 5 **many magazines.**
 6 Q You say many magazines, but --
 7 **A Many, many, many. Sorry.**
 8 Q But not all magazines; right?
 9 **A Correct.**
 10 Q There are some magazines for which the
 11 magazine will only work in a rifle; is that fair to say?
 12 **A It is.**
 13 Q And is it also fair to say that there's some
 14 magazines for which the magazines will only function in a
 15 handgun?
 16 **A It could be, yes.**
 17 Q Could be, or do you know?
 18 **A As -- In my experience, it is. There is**
 19 **handgun-only magazines and rifle-only magazines just as**
 20 **there are many that interchange between both.**
 21 Q So it's fair to say that there are rifle
 22 magazines -- exclusive rifle magazines and exclusive
 23 handgun magazines, and then there are some group of
 24 magazines where they can be either for a rifle or a
 25 handgun?

Page 23

1 **A Correct. Those rifle magazines are typically**
 2 **not described in PICA, however. Some handgun magazines**
 3 **are.**
 4 Q There's another vagueness claim in the Langley
 5 case related to the use of the term AR-type and AK-type.
 6 Are you familiar with that claim?
 7 **A I am.**
 8 Q What's your understanding, in your own words,
 9 of what that claim is?
 10 **A That several of the items described as AR-15**
 11 **or similar bear only facial similarities to them. Similar**
 12 **with the AK descriptions. In fact, the SKS that's**
 13 **described in the AK is not even remotely the same firearm.**
 14 Q When you say facial similarities, what do you
 15 mean?
 16 **A Cosmetic only.**
 17 Q What does cosmetic only mean?
 18 **A Similar color, similar overall shape, but**
 19 **internally different, operationally different.**
 20 Q What does operationally different mean?
 21 **A Manner of function of the firearm. And so if**
 22 **the operational -- say, the gas system that causes function**
 23 **to fire.**
 24 Q What about caliber?
 25 **A Caliber can be interchanged on many of those**

Page 24

1 **firearms. So last I recall was near four dozen, five dozen**
 2 **different calibers available for the AR-15. Both in**
 3 **traditionally -- traditional rifle calibers and handgun**
 4 **calibers.**
 5 Q What's your current address?
 6 **A For the business or my home?**
 7 Q Your home.
 8 **A 23355 Berry Road, Elsah, Illinois.**
 9 Q And what's your date of birth?
 10 **A 05/21/86.**
 11 Q And what's your occupation?
 12 **A I am the owner of Piasa Armory.**
 13 Q How long have you been the owner of Piasa
 14 Armory?
 15 **A Piasa Armory started business in 2012.**
 16 Q What did you do before you were the owner of
 17 Piasa Armory?
 18 **A I owned another small gun business as well**
 19 **called Pulaski Firearm Services from 2009 to 2012.**
 20 Q What did you do prior to Pulaski Firearm
 21 Services?
 22 **A I was a security officer for a casino and in**
 23 **other private security realms. Did process service and**
 24 **worked as a police cadet and police explorer.**
 25 Q As a police cadet, were you training to be a

Page 25

1 police officer?

2 **A I was.**

3 Q Why did you not become a police officer?

4 **A At the time, it was not something I wanted to**

5 **pursue.**

6 Q Was it your choice to not continue?

7 **A Yes.**

8 Q Prior to 2009, where were you employed?

9 **A That was at security companies. I worked for**

10 **Hamilton Security, Hurst Investigation Services, and also**

11 **at Argosy Alton Belle Casino.**

12 Q Can you briefly describe your education for

13 me?

14 **A Sure. I completed high school, have an**

15 **associate's degree in criminal justice.**

16 Q Any other degrees?

17 **A No.**

18 Q And I don't mean this as an insult. This is

19 just a legal term. But do you consider yourself a person

20 of ordinary intelligence?

21 **A I do.**

22 Q Did you ever serve in the military?

23 **A I did not.**

24 Q Have you ever been convicted of a crime?

25 **A No, other than traffic violations.**

Page 26

1 Q We've all been there.

2 And as I understand it, you're not offering

3 testimony as an expert witness, per Mr. Maag?

4 **A That's my understanding.**

5 Q Do you consider yourself a firearms expert?

6 **A I do.**

7 Q And what qualifications do you have to serve

8 as a firearms expert?

9 **A Extensive experience in the field and a**

10 **general love for the knowledge of firearms.**

11 Q Do you have any formal training in firearms?

12 **A I do not.**

13 Q Have you ever --

14 **A Sorry. I am a certified firearms instructor**

15 **for NRA, USCCA, and approved through the State of Illinois**

16 **for concealed carry instruction. And I was a firearm**

17 **patrol cardholder for my security work and a permanent**

18 **employee registration cardholder for that work as well.**

19 **During my time as casino employee, I worked in security**

20 **there and also did training for that position as well.**

21 Q In the course of your employment prior to

22 owning your own businesses, so as a security person, did

23 you ever have to use a firearm in the course of your work?

24 **A I did not.**

25 Q What casino did you work at?

Page 27

1 **A Argosy Alton Belle.**

2 Q Any others?

3 **A No.**

4 Q And did you carry a firearm in the course of

5 your work at that casino?

6 **A I did not.**

7 Q So what type of firearm usage did you have in

8 that job?

9 **A In that job, I had no firearm usage. In the**

10 **work for Hurst Investigations, I was a process server and**

11 **carried a firearm for that.**

12 Q What kind of firearm did you carry when you

13 were a process server?

14 **A At the time, I carried a Springfield XD9.**

15 Q What's the magazine capacity for a Springfield

16 XD9?

17 **A Sixteen rounds.**

18 Q And is that 16 in the magazine or 15 plus one

19 in the chamber?

20 **A Sixteen plus one.**

21 Q Seventeen?

22 **A Correct.**

23 Q For the firearm as a whole?

24 **A As a whole, yes. Sixteen in the magazine, one**

25 **in the firearm.**

Page 28

1 Q Have you ever published any articles, books or

2 other writings about firearms?

3 **A Not through official -- any official channels.**

4 **Just occasional replies or blog posts or similar things.**

5 Q So you've written things on the internet about

6 firearms?

7 **A I have.**

8 Q Where on the internet?

9 **A Sites like Reddit and Facebook. I've also**

10 **been interviewed many times by local media sources, like**

11 **the Telegraph in Alton, KMOV, and the RiverBender, which is**

12 **also an Alton publication.**

13 Q What have you been interviewed about?

14 **A Firearms.**

15 Q And you've given interviews about PICA?

16 **A I have.**

17 Q You're not a trained historian?

18 **A I am not.**

19 Q You're not a trained firearms historian?

20 **A I am not.**

21 Q And you're not an attorney?

22 **A Correct.**

23 (Deposition Exhibit No. 1 marked for

24 identification.)

25 Q (By Mr. Wells) In preparing -- So I'm going to

Page 29

1 go ahead and mark these. I'm going to hand you a copy of
 2 what's labeled Affidavit of Scott Pulaski, and it's dated
 3 January 23rd, 2023. I'll mark it as Exhibit 1.
 4 **A Thank you.**
 5 Q Do you recognize this document?
 6 **A I do.**
 7 Q What is it?
 8 **A This is the affidavit that I filed with**
 9 **Mr. Maag.**
 10 Q And flipping to the last page, page six of
 11 six, is that your signature?
 12 **A Yes, it is.**
 13 Q And everything in here is your testimony?
 14 **A Correct.**
 15 (Deposition Exhibit No. 2 marked for
 16 identification.)
 17 Q (By Mr. Wells) Okay. All right. I'll hand
 18 you what I'm going to mark as Deposition Exhibit No. 2. Do
 19 you recognize this document?
 20 **A I do.**
 21 Q What is it?
 22 **A That is the statement filed with Mr. Maag.**
 23 Q And directing your attention to page seven of
 24 this document. Is that your signature?
 25 **A It is.**

Page 30

1 Q And everything in Deposition Exhibit 2 is your
 2 testimony; right?
 3 **A Yes.**
 4 Q And in preparing Deposition Exhibits 1 and 2,
 5 so your January sworn statement and your May sworn
 6 statement, you testified earlier that you just relied on
 7 your knowledge of firearms; is that right?
 8 **A Correct.**
 9 Q Did you rely on anything else in preparing?
 10 **A Knowledge of Mr. Maag as well. So we also use**
 11 **things like the books you have here on the table, Shooter's**
 12 **Guide, things like the Blue Book of Gun Values, and various**
 13 **internet sources and other similar publications.**
 14 Q So you collaborated to -- with Mr. Maag to
 15 identify certain resources, and you relied on those
 16 resources?
 17 **A Correct.**
 18 Q And are those the types of materials typically
 19 relied upon by firearms experts?
 20 **A Yes.**
 21 Q How do you know?
 22 **A Through my experience in the field and through**
 23 **various other comments through other firearms experts.**
 24 Q What methodology did you use in formulating
 25 your opinions in the January 23rd, 2023, affidavit?

Page 31

1 **A Working with Mr. Maag directly on that.**
 2 Q Was there any type of peer-reviewed
 3 methodology that you used?
 4 **A There's not a wide variety of peer-reviewed**
 5 **opportunities in our industry.**
 6 Q What methodology did you use in formulating
 7 your opinions in the May 18, 2023, affidavit?
 8 **A The same, working with Mr. Maag.**
 9 Q And do you know if that's the type of
 10 methodology typically relied upon by firearms experts?
 11 **A I do not. I do -- I do understand that**
 12 **firearm experts rely on their experiences in the field and**
 13 **in publications and other informational sources they can**
 14 **find on any relevant firearms.**
 15 Q And you mentioned that -- You gestured to some
 16 of the books that I have here. So, for instance, I have
 17 the Shooter's Bible, 114th Edition. Is this the type of
 18 thing that a firearms expert would rely upon for
 19 information about firearms?
 20 **A One of many sources, yes.**
 21 Q And did you rely on some version of the
 22 Shooter's Bible in preparing the Exhibits 1 and 2?
 23 **A Directly, no. However, through my experience**
 24 **of using the Shooter's Bible in the past, that knowledge**
 25 **would have been gained from that book.**

Page 32

1 Q And the Shooter's Bible is something that you
 2 rely upon in your work at Piasa Armory?
 3 **A Correct. Through the course of business.**
 4 Q Are you familiar with the Shooter's Bible
 5 Guide to AR-15s, 2nd Edition?
 6 **A I am.**
 7 Q Do you own this?
 8 **A I'm sure that I do. I have a very large book**
 9 **shelf.**
 10 Q And is this Shooter's Bible Guide to AR-15s
 11 something that you rely upon in the course of your business
 12 at Piasa Armory?
 13 **A Occasionally, yes. Typically, that knowledge**
 14 **is stuff that I've gained over the years of experience.**
 15 Q All right. So I'm going to direct your
 16 attention to Exhibit 1, your January 23, 2023, affidavit,
 17 paragraph three. You say, "I am personally familiar with
 18 firearms, both historical and modern, as well as firearms
 19 regulations both in Illinois and nationally on account that
 20 ATF, the federally agency that licenses my business, makes
 21 me comply with all such laws and provides me a publication
 22 listing the current ones."
 23 That's your testimony?
 24 **A Yes, sir.**
 25 Q And you say ATF, the federally agency. I

Page 33

1 assume you meant federal agency?

2 **A Yes, sir.**

3 Q That's just a typo?

4 **A Yes.**

5 Q How did you develop your familiarity with

6 firearms?

7 **A I started interest in firearms when I was 12**

8 **through scouting and taking the merit badge programs that**

9 **scouting offers. And then researching independently after**

10 **that, finding every available knowledge source that I could**

11 **access at the time and consuming as much of that knowledge**

12 **as possible.**

13 Q What types of knowledge sources?

14 **A Things like radio shows, books, publications**

15 **like the Shooter's Bible. Things like the Blue Book of Gun**

16 **Values. Any other historical documentation that I could**

17 **find or other books about the history of firearms.**

18 Q What firearms do you currently own?

19 **A Wide variety from antique to modern, pistols,**

20 **rifles, shotguns, black powder, center fire, rim fire.**

21 Q And pistols is a category of firearm that you

22 understand what that means?

23 **A Yes.**

24 Q Rifles is a category of firearms, you

25 understand what that means?

Page 34

1 **A Yes.**

2 Q Shotgun is a category of firearms, you

3 understand what that means?

4 **A Yes.**

5 Q And you own firearms in each of those

6 categories?

7 **A I do.**

8 Q What's the difference between a pistol and a

9 rifle?

10 **A A pistol is typically designed to be fired**

11 **with one hand, even though modern handgun shooting**

12 **techniques use two hands. Rifles are typically designed to**

13 **be held to the shoulder and fired with two hands.**

14 Q What's the difference between a pistol and a

15 shotgun?

16 **A A pistol, the same deal. It -- It's designed**

17 **to be fired by one hand from the hand, not from the**

18 **shoulder. Where a shotgun's designed to be placed in the**

19 **shoulder. Also, pistols expel a single projectile where**

20 **shotguns typically expel multiple, with the exception of**

21 **slugs, which are a single projectile.**

22 Q What's the difference between a rifle and a

23 shotgun?

24 **A Shotguns typically have a smooth bore, with**

25 **the exception of slug barrels, which are rifle. Designed**

Page 35

1 **to expel multiple projectiles with the exception of slugs,**

2 **where rifles are designed to fire a single projectile.**

3 Q Approximately how many firearms do you own?

4 **A Approximately 100.**

5 Q And in terms of pistols, what are the specific

6 pistols you own?

7 **A I have a list, but I did not bring that list**

8 **with me. But I have --**

9 Q Just generally summarize.

10 **A A variety of pistols from major manufacturers,**

11 **Glock, Smith & Wesson, Walther, for modern items. Antiques**

12 **such as Lefauchaux Pinfire, black powder replicas, foot**

13 **lock and cap lock design, World War I and World War II**

14 **military pistols.**

15 Q What about rifles? What types of rifles do

16 you own?

17 **A Everything -- Similar. So older cap lock**

18 **design, military -- former military rifles from the early**

19 **1900's up through modern -- modern supporting rifle style,**

20 **AR-15, AK-47.**

21 Q So you own AR-15 style rifles?

22 **A I do.**

23 Q Do you own AK-47 style rifles?

24 **A I do.**

25 Q And when I say AR-15 style rifle, you

Page 36

1 understand what I mean?

2 **A I do.**

3 Q When I say AK-47 style rifle, you understand

4 what I mean?

5 **A I do.**

6 Q Do you own any other AR-type rifles?

7 **A I own AR-type rifles as listed in PICA. But**

8 **they would not be considered AR-type rifles by the**

9 **industry.**

10 Q What are you including in that category?

11 **A The Bushmaster ACR is listed in the AR-15**

12 **style, but it's more similar to an AR-180 or AR-18 style**

13 **rifle.**

14 Q And why do you say it's -- the Bushmaster ACR

15 is more similar to an AR-180?

16 **A It uses the operating system from an AR-18 or**

17 **AR-180.**

18 Q Do you have any AR-15 rifles that you would

19 agree are AR-type rifles?

20 **A I do.**

21 Q What are those?

22 **A Piasa Armory is a manufacturer, so we have our**

23 **own branded AR-15 rifles. It's called the EBR-15, and I**

24 **have several of those items.**

25 Q Do you have AK-47 style rifles that you would

Page 37

1 understand to be AK-type rifles?

2 **A I do. I have one.**

3 Q What's that?

4 **A That is a Romanian WASR-10, which is listed**

5 **specifically in PICA.**

6 Q Does some of your knowledge about firearms

7 come from the internet?

8 **A It does.**

9 Q I'm going to ask you about some websites

10 and --

11 **A Sure.**

12 Q -- and to see whether or not you rely on those

13 websites for your knowledge about firearms.

14 Are you familiar with Pew Pew Tactical?

15 **A I am.**

16 Q Do you go to Pew Pew Tactical?

17 **A Occasionally.**

18 Q Do you rely on any information from Pew Pew

19 Tactical?

20 **A Not often.**

21 Q Why not?

22 **A That's just not one of my common sources.**

23 Q What are your common sources from the

24 internet?

25 **A I typically look at sources that are more in a**

Page 38

1 **consumable format that I can use while driving back and**

2 **forth to work or doing tasks around the shop, instead of**

3 **sitting and directly reading these days. So things like**

4 **Gun Talk podcast, Gun Talk media.**

5 Q What about guns.com, have you ever gone there?

6 **A I have.**

7 Q And do you rely on guns.com for information

8 about firearms?

9 **A Occasionally. We typically use them more as a**

10 **resource for sales than information these days.**

11 Q How about AR Build Junkie, is that a website

12 you're familiar with?

13 **A It is not.**

14 Q When I say AR Build Junkie, do you have an

15 idea of what AR means?

16 **A I do.**

17 Q What is that?

18 **A It would refer to an AR-15 style rifle and the**

19 **accessories and parts necessary to build one.**

20 Q Are you familiar with American Rifleman?

21 **A I am.**

22 Q What is that?

23 **A That's a publication by the National Rifle**

24 **Association.**

25 Q Do you read American Rifleman?

Page 39

1 **A I do. I'm a life member of the National Rifle**

2 **Association.**

3 Q Do you consider American Rifleman a good

4 source of information about firearms?

5 **A I do.**

6 Q Are you familiar with AR-15.com?

7 **A I am.**

8 Q Have you been to that site?

9 **A Of course.**

10 Q Have you ever posted on that site?

11 **A I'm sure that I have.**

12 Q Do you have a user name on that website?

13 **A I do.**

14 Q What is that?

15 **A To my knowledge, it is ScottP8113. It's been**

16 **a very long time since I've used that website as content**

17 **provider, so myself providing content.**

18 Q Say it one more time. ScottP?

19 **A ScottP8113.**

20 Q 8113. Okay. So you said on AR-15.com, it's

21 been a while since you've been a content provider. But you

22 still go there to read it?

23 **A It's been a while since I've been able to do**

24 **that. Unfortunately, business responsibilities keep me**

25 **from browsing forums on a long -- for a long amount of**

Page 40

1 **time. So I typically go for a specific bit of knowledge.**

2 Q Understood. And when you go for a specific

3 bit of knowledge, it's a good resource to find that?

4 **A It is.**

5 Q How about gun manufacturers' websites, is that

6 a source that you rely upon in your business?

7 **A It is.**

8 Q Do you ever look at product reviews from gun

9 manufacturers' websites?

10 **A Typically, I prefer customer or consumer**

11 **reviews, be they in a forum or on sites such as YouTube,**

12 **that we can find a more unbiased review -- review source.**

13 Q So, for instance, if there was a gun

14 manufacturer's website, and there were user comments, you

15 wouldn't rely upon that as much as you would, say, comments

16 on AR-15.com; is that fair to say?

17 **A Not necessarily. A -- Comments provided by a**

18 **user rather than comments provided by the company that**

19 **indicates it's from a user.**

20 Q Because the company might be biased?

21 **A Correct.**

22 Q All right. Let's see.

23 Paragraph three again in Exhibit 1. You say,

24 "I am personally familiar with firearms, both historical

25 and modern, as well as firearms regulations, both in

Page 41

1 Illinois and nationally, on account that ATF, the federal
 2 agency that licenses my business, makes me comply with all
 3 such laws and provides me a publication listing the current
 4 ones."
 5 ATF licenses your business. How long have you
 6 been licensed by ATF at Piasa Armory?
 7 **A Since 2012.**
 8 Q And --
 9 **A Actually -- May I correct that? I believe**
 10 **2013 is when we started with the license.**
 11 Q And you've maintained a federal firearms
 12 license for Piasa Armory since that time?
 13 **A Yes, sir.**
 14 Q And generally speaking, you've been complying
 15 with ATF regulations; is that fair to say?
 16 **A Yes.**
 17 Q How do you, as a business at Piasa Armory,
 18 ensure that you're in compliance with ATF regulations?
 19 **A I am, in addition to managing the day-to-day**
 20 **operation, the compliance director for Piasa Armory also.**
 21 Q What does that involve?
 22 **A That involves reviewing regularly every**
 23 **firearm record, every transaction record that goes through**
 24 **our company, and providing regular training as the Firearm**
 25 **Dealer Licensing Act requires.**

Page 42

1 Q Do you review any publications from ATF?
 2 **A I do. They provide a national firearms law**
 3 **update, which they just recently updated.**
 4 Q You mentioned here, "ATF provides me a
 5 publication listing the current ones."
 6 What are you referring to there?
 7 **A I do not recall the title of that, but it's a**
 8 **regularly updated publication that they provide.**
 9 Q Okay. I'm going to mark Exhibit 3.
 10 (Deposition Exhibit No. 3 marked for
 11 identification.)
 12 Q (By Mr. Wells) I'm showing Mr. Pulaski what I
 13 have marked as Deposition Exhibit No. 3. It's a document
 14 titled State Laws and Published Ordinances, Illinois. Is
 15 this a document that you've seen before?
 16 **A Yes.**
 17 Q And what is it?
 18 **A This lists all of the relevant state laws**
 19 **pertaining to firearms that we're required to follow by ATF**
 20 **and by the state law.**
 21 Q And when you mentioned earlier that you review
 22 information from the state and also from the federal
 23 government, this is the type of thing you're referring to?
 24 **A Yes, this and some of the things that are**
 25 **provided on the Illinois General Assembly website and**

Page 43

1 **public acts.**
 2 Q I'm going to -- I'm not going to go too deep
 3 into these, but I just want to make sure that we're talking
 4 about the same rough thing.
 5 MR. WELLS: We're on four?
 6 (Deposition Exhibit No. 4 marked for
 7 identification.)
 8 Q (By Mr. Wells) I'm going to hand you what's --
 9 what I'm marking as Deposition Exhibit 4. Are you familiar
 10 with this document?
 11 **A I am.**
 12 Q What is it?
 13 **A It's the Federal Firearms Regulations**
 14 **Reference Guide.**
 15 Q Is this a document that you use in the course
 16 of your business at Piasa Armory?
 17 **A It is.**
 18 Q Okay. In paragraph four of your January 23rd,
 19 2023, affidavit, which I've marked as Deposition Exhibit 1,
 20 you say, "In addition to being a firearms dealer, Piasa
 21 Armory and myself teach Illinois State Police certified
 22 concealed carry classes, both new and renewal."
 23 **A Yes.**
 24 Q And as a certified concealed carry instructor,
 25 you're familiar with the Firearm Concealed Carry Act in

Page 44

1 Illinois?
 2 **A I am.**
 3 Q And you also have a concealed carry license
 4 yourself?
 5 **A I do.**
 6 Q Do you carry a concealed firearm in Illinois?
 7 **A I do.**
 8 Q What firearm do you carry?
 9 **A I typically carry either a Walther PPQ or a**
 10 **Glock 19 or 17.**
 11 Q What's the magazine capacity on a Walther PPQ?
 12 **A Either a 15 in the magazine or 19 in the**
 13 **magazine.**
 14 Q And now that PICA is in effect, if you're
 15 carrying your Walther PPQ, do you understand which magazine
 16 you should carry?
 17 **A I do.**
 18 Q And which magazine is that?
 19 **A Fifteen round is required by PICA.**
 20 Q With respect to your Glock 19 or 17, what are
 21 the magazine capacities for the Glock 19? Let's start with
 22 that one.
 23 **A Standard capacity is 15 in the magazine;**
 24 **however, it can accept larger magazines, 17, or magazines**
 25 **with extensions up to 33 or 50.**

Page 45

1 Q And when you carry your Glock 19 now, what
 2 size magazine do you carry?
 3 **A Fifteen now.**
 4 Q And is that because of PICA?
 5 **A It is.**
 6 Q So you understand that you can no longer carry
 7 the 17-round magazine for your Glock 19?
 8 **A I do.**
 9 Q How about your Glock 17, what's the magazine
 10 capacity for that?
 11 **A Seventeen is standard. Glock now makes**
 12 **15-round magazines that also fit that firearm.**
 13 Q Do you have any of those 15-round magazines?
 14 **A I do not.**
 15 Q Could you acquire them?
 16 **A I could.**
 17 Q And you would know that in acquiring the
 18 15-round magazine, that would be something that would
 19 comply with PICA; right?
 20 **A I do; however, I've chosen to not carry the 17**
 21 **and rather just carry the 19.**
 22 Q And do you own any 17-round magazines for the
 23 Glock 19?
 24 **A I do.**
 25 Q But now you just carry the 15-round magazines

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1 for the Glock 19; right?
 2 **A Correct.**
 3 Q And you understand that as a concealed carry
 4 license holder, you're allowed to carry a concealed
 5 handgun; correct?
 6 **A Correct.**
 7 Q You're not allowed to carry a concealed rifle;
 8 correct?
 9 **A Correct.**
 10 Q You're not allowed to carry a concealed
 11 shotgun; correct?
 12 **A Correct.**
 13 Q All right. I'm going to direct your attention
 14 to Exhibit 2. So this is your May 18, 2023, declaration,
 15 paragraph 26.
 16 You say, "Likewise, there are no objective
 17 standards to determine whether a given firearm is an
 18 AK-type, an AR-type or something else. In fact, even
 19 elicited examples are oftentimes not within the parameters of
 20 what even most firearms experts would consider to be an
 21 AK-type, like the SKS of an AR-type."
 22 That was your testimony?
 23 **A Yes.**
 24 Q And where it says, "An AK-type like the SKS of
 25 an AR-type," you meant "or"; right?

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1 **A Yes.**
 2 Q And that was just a typo?
 3 **A Correct.**
 4 Q You believe there are, quote, parameters,
 5 close quote, for what most firearms experts would consider
 6 an AR-type; correct?
 7 **A Correct.**
 8 Q In your mind, what are the parameters that
 9 most firearms expert would consider to be an AR-type?
 10 **A An AR-type would be a firearm with typically a**
 11 **16 or 20-inch barrel, adjustable or fixed stop, pistol**
 12 **grip, detachable magazine, and using a -- a direct**
 13 **impingement gas system, rotary-operated bolt.**
 14 Q Why did those design elements make something
 15 an AR-type?
 16 **A Because that's what the designer of the AR**
 17 **used to create that firearm.**
 18 Q Who was the designer of the AR?
 19 **A Eugene Stoner.**
 20 Q Who was Eugene Stoner?
 21 **A Eugene Stoner worked for ArmaLite and several**
 22 **other companies in the mid 1900s, 1950s, 1960s, to develop**
 23 **the AR-15 and several other designs.**
 24 Q And you understand that when people use the
 25 term AR-type today, they are referencing firearms that are

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1 connected to that AR-15 that Eugene Stoner denied --
 2 designed?
 3 **A Some people -- Some people reference that, and**
 4 **some tend to refer to any firearm that looks vaguely like**
 5 **it as an AR-type rifle.**
 6 Q And in terms of how you went about identifying
 7 those particular features that you would consider
 8 associated with an AR-type firearm, how did you identify
 9 those particular features?
 10 **A Based on the designs that Stoner produced.**
 11 Q Would you consider an AR-10 an AR-type rifle?
 12 **A Similar, but different. It's -- Shares a lot**
 13 **of the same characteristics. But the AR-10 was typically a**
 14 **machine gun designed for the military. There's been a**
 15 **civilian variant of that that's been developed and used.**
 16 Q In your experience, as someone in the firearms
 17 industry, would you say that the AR-15 or the AR-10 is more
 18 popular among consumers?
 19 **A AR-15, with AR-10 being very close.**
 20 Q What is an AR pistol?
 21 **A An AR pistol would be an AR-15 that complies**
 22 **with the ATF's definitions of handgun.**
 23 Q Why does it have AR in the name?
 24 **A Because the design is based from the AR-15,**
 25 **which is the ArmaLite rifle.**

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1 Q Have you ever seen AR, just those two letters,
 2 A-R, used to refer to a firearm?
 3 A Yes.
 4 Q Did you understand what that meant?
 5 A I do, through my experience, but I've seen
 6 many people be confused and refer to anything that is a
 7 rifle that shares similar characteristics to be called an
 8 AR or even an AK.
 9 Q Piasa Armory has a website; right?
 10 A It does.
 11 Q Who's responsible for the content of that
 12 website?
 13 A I am.
 14 Q Do you write it yourself?
 15 A I do.
 16 Q I'm marking Deposition Exhibit 5.
 17 (Deposition Exhibit No. 5 marked for
 18 identification.)
 19 Q (By Mr. Wells) Do you recognize this document?
 20 A I do.
 21 Q What is it?
 22 A This is an example of gunsmith services that
 23 we offer.
 24 Q Would you agree that this appears to be a
 25 printout from the Piasa Armory website?

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1 A It is.
 2 Q And do you see at the bottom left hand it says
 3 the URL for Piasa Armory?
 4 A Yes.
 5 Q And it's specifically the gunsmith page?
 6 A Yes.
 7 Q Who's the audience for your website?
 8 A Any -- Anyone. So young, old, novice,
 9 experienced, professional.
 10 Q Is it fair to say that the audience for your
 11 website is potential customers for Piasa Armory?
 12 A It is, but also not potential customers. Our
 13 business operates as education also.
 14 Q And when you say education -- it operates as
 15 education, what do you mean?
 16 A Educational I should say. So our goal, our
 17 company motto is creating a culture of responsible firearm
 18 ownership, which is being willing to provide information to
 19 anyone who asks, not just potential customers, helping to
 20 teach safe handling, safe operation, and basic familiarity.
 21 Q When you write things on your website, do you
 22 use terminology -- on the Piasa Armory website, do you use
 23 terminology that you believe your customers will
 24 understand?
 25 A I work to -- Jargon is a difficult thing in

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1 our industry. Tends -- It tends that with more knowledge
 2 in the industry, more jargon is used, as in many
 3 industries. So I work to eliminate jargon as much as
 4 possible, but it doesn't always work.
 5 Q Directing your attention to where it says
 6 AR-15 build room. Directly under that, it says, "For \$40,
 7 you can have access to our AR build room."
 8 Do you see that?
 9 A Yes.
 10 Q Did you write that sentence?
 11 A I did.
 12 Q And when you wrote that sentence, you had an
 13 understanding of what AR meant?
 14 A I did, and especially because AR-15 build room
 15 is written two lines above it.
 16 Q And from the context, you can tell that AR
 17 means AR-15; is that fair to say?
 18 A Yes.
 19 Q You got to wait for me to finish.
 20 A Yes.
 21 Q That was a yes.
 22 And what does AR refer to there?
 23 A In this case, it refers to AR-15.
 24 Q What is your AR-15 -- I'm sorry. Let's strike
 25 that.

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1 What is your AR build room?
 2 A We don't have an AR build room. It's an AR-15
 3 build room. As I mentioned, it was an example of jargon or
 4 poor proofreading.
 5 Q But you call it an AR build room. Was that
 6 just a shorthand?
 7 A Yes.
 8 Q Do customers use the AR build room?
 9 A Not lately.
 10 Q Prior to January 10, 2023, did customers use
 11 the AR build room?
 12 A Yes.
 13 Q What did they use the AR build room for?
 14 A Typically installing parts and accessories.
 15 Or we would also offer to teach how to properly assemble an
 16 AR-15 so it would operate safely.
 17 Q Did customers ever use the AR build room to
 18 assemble firearms other than an AR-15?
 19 A Typically not, but I'm sure that it's happened
 20 over the years.
 21 Q Do you recall any specific occasions where
 22 someone assembled something other than AR-15?
 23 A I'm sure that someone has assembled a Glock
 24 pistol or other similar pistols.
 25 Q Has a customer ever built an AR-7 in your AR

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1 build room?
 2 **A That would be rather difficult.**
 3 Q Is that a no?
 4 **A That -- To my knowledge, no.**
 5 Q How about an AR-5? Has a customer ever used
 6 an AR -- your AR build room to construct an AR-5?
 7 **A Not to my knowledge.**
 8 Q And the reason you offered, prior to
 9 January 10, 2023, an AR build room is because the AR-15 is
 10 very common; right?
 11 **A It is.**
 12 Q All right. I'm going to show you -- set that
 13 one to the side.
 14 (Deposition Exhibit No. 6 marked for
 15 identification.)
 16 Q (By Mr. Wells) I'm handing you what I'm
 17 marking as Deposition Exhibit No. 6. Are you familiar with
 18 this document?
 19 **A I am.**
 20 Q How are you familiar with it?
 21 **A This was provided to all FFL's by the ATF.**
 22 Q And you reviewed it in your capacity as an
 23 owner of Piasa Armory; is that right?
 24 **A I did.**
 25 Q And you reviewed it when ATF issued it?

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1 **A Yes.**
 2 Q And it says, "March 22nd, 2022, open letter to
 3 all federal firearms licensees."
 4 So you reviewed it approximately in March of
 5 2022; is that fair to say?
 6 **A On or about that.**
 7 Q March, April?
 8 **A Yes.**
 9 Q Around the spring of 2022?
 10 **A Yes.**
 11 Q I'm directing your attention to the second
 12 paragraph. You see it says FRT?
 13 **A Yes.**
 14 Q Do you have an understanding of what FRT means
 15 in that sentence?
 16 **A I do.**
 17 Q What is that?
 18 **A That is a forced reset trigger.**
 19 Q So in paragraph two of Deposition Exhibit 6,
 20 it says, "These particular FRTs," meaning forced reset
 21 triggers, "are being marketed as replacement triggers for
 22 AR-type firearms."
 23 Do you see that?
 24 **A I do.**
 25 Q And when you read this document in the spring

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1 of 2022, did you have an understanding as to what AR-type
 2 firearms meant?
 3 **A As a member of the industry with experience, I**
 4 **do.**
 5 Q And this was a document that you reviewed that
 6 came from ATF; is that right?
 7 **A Yes.**
 8 Q And when you're reviewing documents from ATF,
 9 they regulate firearms; right?
 10 **A They do.**
 11 Q So they use firearms terminology that
 12 regulated entities will understand?
 13 **A Traditionally.**
 14 Q In the spring of 2022, when you got Deposition
 15 Exhibit 6, did you reach out to ATF seeking clarification
 16 as to what they meant about AR-type firearms?
 17 **A I did not, as I understood what they meant by**
 18 **AR-type firearms. Fires that use the fire control group of**
 19 **an AR.**
 20 Q What is a fire control group?
 21 **A Typically the trigger and hammer.**
 22 (Deposition Exhibit No. 7 marked for
 23 identification.)
 24 Q (By Mr. Wells) All right. I'm going to hand
 25 you another exhibit I'm marking as Deposition Exhibit

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1 No. 7.
 2 **A Thank you.**
 3 MR. MAAG: Thank you.
 4 Q (By Mr. Wells) Do you recognize what I've
 5 marked as Deposition Exhibit No. 7?
 6 **A I do.**
 7 Q What is it?
 8 **A This is the federal definition of a frame or**
 9 **receiver.**
 10 Q What is a frame or receiver in your own words?
 11 **A That'd be the component of a firearm that**
 12 **contains the working parts of the firearm.**
 13 Q Directing your attention to paragraph two on
 14 Deposition Exhibit 7, the first page. Do you see it says,
 15 "The term receiver means the part of a rifle, shotgun or
 16 projectile weapon other than a handgun or variance thereof
 17 that provides housing or a structure for the primary
 18 component designed to block or seal the breach prior to
 19 initiation of the firing sequence, i.e., bolt, breach lock
 20 or equivalent, even if pins or other attachments are
 21 required to connect to such component to the housing or
 22 structure?"
 23 **A I do.**
 24 MR. MAAG: I'm going to interpose an
 25 objection. I think the U.S. Court of Appeals for the Fifth

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1 Circuit has stayed the implementation of these rules.
 2 MR. WELLS: Are we in the Fifth Circuit?
 3 MR. MAAG: No, but I think it's a nationwide
 4 injunction.
 5 MR. WELLS: Is it? Okay. All right.
 6 MR. MAAG: I mean, you can proceed. I just
 7 want --
 8 MR. WELLS: Right. Fair enough.
 9 Q (By Mr. Wells) With respect to paragraph
 10 three, do you see where it says the terms variant and
 11 variance thereof?
 12 **A I do.**
 13 Q And do you understand what's meant by variant?
 14 **A I do.**
 15 Q Do you see in paragraph three where it says,
 16 "For example, an AK-type firearm with a short stock, i.e.,
 17 pistol grip, is a pistol variant of an AK-type rifle. An
 18 AR-type firearm with a short stock, i.e., pistol grip, is a
 19 pistol variant of an AR-type rifle. And a revolving
 20 cylinder shotgun is a shotgun variant of a revolver."
 21 Do you see that sentence?
 22 **A I do.**
 23 Q And do you understand the use of the phrase
 24 AR-type firearm in that?
 25 **A Thanks to my experience in -- in the industry,**

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1 **yes, I do.**
 2 Q And do you understand what AK-type firearm
 3 means in that?
 4 **A Again, thanks to my experience in the**
 5 **industry, I do.**
 6 Q And I can represent to you that 27 CFR Section
 7 478.12, which is Deposition Exhibit 7, which we've been
 8 looking at, it took effect in August -- August 24th of
 9 2022. And at Piasa Armory, you would have complied with
 10 the regulation when it was in effect; correct?
 11 **A Correct.**
 12 MR. MAAG: Subject to my belief it has been
 13 stayed by the Fifth Circuit.
 14 MR. WELLS: That's why I used past tense.
 15 MR. MAAG: Right.
 16 Q (By Mr. Wells) Have you filed any lawsuits
 17 challenging the regulation in Deposition Exhibit 7?
 18 **A Not at this time.**
 19 Q And you mentioned earlier that you're familiar
 20 with Shooter's Bible?
 21 **A I am.**
 22 Q And I think you also mentioned that you're
 23 familiar with Shooter's Bible Guide to AR-15s --
 24 **A Yes.**
 25 Q -- correct?

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1 (Deposition Exhibit No. 8 marked for
 2 identification.)
 3 Q (By Mr. Wells) I'm handing you what I've
 4 marked as Deposition Exhibit 8, which I can represent to
 5 you is an excerpt, so a collection of pages from Shooter's
 6 Bible Guide to AR-15, 2nd Edition.
 7 **A Okay.**
 8 Q I'm directing your attention to the last page.
 9 MR. MAAG: Printed in China.
 10 Q (By Mr. Wells) Are you familiar with Doug
 11 Howlett?
 12 **A Not personally, but as a writer, yes.**
 13 Q So you're familiar with his writing?
 14 **A Yes.**
 15 Q And it says here that he worked as an editor
 16 of American Hunter magazine. Are you familiar with that
 17 magazine?
 18 **A I am.**
 19 Q And is it a good source of information about
 20 firearms?
 21 **A I have not read American Hunter magazine as**
 22 **referential material.**
 23 Q It says here Rob Manning is another one of the
 24 authors, and he's the current editor, at least as of this
 25 publication date, of Gun World magazine. Are you familiar

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1 with Gun World magazine?
 2 **A I am.**
 3 Q Is that a good source of information about
 4 firearms?
 5 **A It can be.**
 6 Q I'm directing your attention to the second
 7 paragraph on this page. It says, "In this complete book of
 8 AR style firearms, you can peruse the products of all
 9 manufacturers, learn about the evolution of the AR from its
 10 uses in the military in the 1960s as well as gain essential
 11 knowledge on the parts and functions of the rifle. Also
 12 included are chapters on customizing and accessorizing ARs
 13 and much more."
 14 Do you have an understanding as to what AR
 15 means in this paragraph?
 16 **A I do, as an expert in the industry. However,**
 17 **a layman may have difficulty without the reference to the**
 18 **top of the page referring to AR-15 rifle.**
 19 Q And we see here the evolution of the AR from
 20 its uses in the military in the 1960s. Do you have an
 21 understanding as to what that's referring to?
 22 **A The AR was part of the military design**
 23 **program. However, it was also a civilian rifle during that**
 24 **same time.**
 25 Q And in that time period, is that when,

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1 roughly, Eugene Stoner was involved with the design of the
 2 AR-15?
 3 **A Yes.**
 4 Q And the AR-15 became the M-16; is that right?
 5 **A It did. It also became a Colt firearm that**
 6 **was sold to the civilian market.**
 7 Q What's the difference between the civilian
 8 Colt firearm that's an AR-15 and the military AR-15 that
 9 was named the M-16?
 10 **A The M-16 is a select-fire firearm machine gun,**
 11 **so it's able to fire more than one projectile when pulling**
 12 **the trigger.**
 13 Q Any other differences?
 14 **A On the outside, no, but definitionally, that's**
 15 **what makes the difference.**
 16 Q And any other differences relate to that
 17 effectuating that difference between select fire and
 18 semi-automatic fire; is that right?
 19 **A Minor differences by the manufacturer, yes.**
 20 **Things that would prevent somebody from easily converting a**
 21 **civilian AR-15 into an M-16.**
 22 Q But to the extent that there are differences
 23 between a military M-16 and the AR-15, the --
 24 **A They --**
 25 Q Let me just finish.

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1 The differences would relate to, again, the
 2 internal mechanisms that either facilitate, in the case of
 3 an M-16, automatic fire or aren't there in a semi-automatic
 4 civilian version; is that correct?
 5 **A Correct. And minor cosmetic details.**
 6 Q All right. So sticking with this exhibit,
 7 I'll direct your attention to the table of contents. Do
 8 you see where it says, Chapter 4, AR Rifle Models?
 9 **A I do.**
 10 Q And do you have an understanding of what that
 11 means?
 12 **A I do, as an industry member.**
 13 Q And if you were to look at chapter four, what
 14 would you expect to see there?
 15 **A I would assume I would see AR-15s, AR-10s,**
 16 **AR-18s, and other variants.**
 17 Q Would you expect to see an AR-7?
 18 **A Typically not. That doesn't fall on a similar**
 19 **style to the AR-15.**
 20 Q What about an AR-5, would you expect to see an
 21 AR-5?
 22 **A Not necessarily.**
 23 Q Directing your attention to page 51 at the
 24 bottom of this same exhibit, Exhibit 8. And the first
 25 sentence, I'm going to read it to you, "Following is

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1 undoubtedly the most comprehensive listing of current AR
 2 style rifle models available in print or on the web,
 3 though, it is by no means exhaustive."
 4 Do you see that?
 5 **A I do.**
 6 Q And do you understand what AR style rifle
 7 models means in this sentence?
 8 **A I do. Again, thanks to my industry knowledge**
 9 **and the title of the book.**
 10 Q And directing your attention to the last
 11 sentence in this paragraph that starts with "and."
 12 "And admittedly, with so many small gunmakers
 13 coming into the fold and just as quickly falling back out
 14 of it, capturing every manufacturer is a target even a
 15 custom built AR couldn't hit."
 16 Do you see that?
 17 **A I do.**
 18 Q Do you have an understanding of what custom
 19 built AR means here?
 20 **A I do.**
 21 Q What is that understanding?
 22 **A That would refer to somebody who builds a**
 23 **custom AR-15 or AR-10 typically in the industry.**
 24 Q In the first sentence that we looked at just a
 25 second ago, the author stated, "It's by no means an

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1 exhaustive list of AR rifle models."
 2 Do you agree that it would be very difficult
 3 to make an exhaustive list of all AR style rifle models?
 4 **A I do.**
 5 Q Do you agree that it would be possible to make
 6 a large, but not necessarily complete, list of AR style
 7 rifle models?
 8 **A I do. The state's done that with the PICA**
 9 **listing of AR-15 and variants.**
 10 Q And, in fact, this Shooter's Bible, Guide to
 11 AR-15s, 2nd Edition, which I believe you said you have, the
 12 authors here have compiled quite a list of AR-15 models;
 13 right?
 14 **A They have made a large list, right.**
 15 Q And if I asked you personally, based on your
 16 knowledge, to compile a list of 50 AR rifle models, you
 17 could do that; correct?
 18 **A Probably.**
 19 Q Could you do more than 50?
 20 **A Probably.**
 21 Q I'm going to direct your attention to appendix
 22 one in this same exhibit. And I'm not going to ask you to
 23 look at it in detail, but does it appear to be a list of AR
 24 manufacturers?
 25 **A It is. Not anywhere near complete.**

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1 Q And there are 141, based on my count, AR
 2 manufacturers identified here. You said not anywhere near
 3 complete. Why do you say that?
 4 **A Because of the nature of firearms**
 5 **manufacturing and the nature of the AR-15 manufacturing.**
 6 **For example, ourselves, we don't physically**
 7 **manufacture our own. We use a process called a variance to**
 8 **produce our AR-15 lower, half of the receiver system for**
 9 **the AR-15. So without intimate industry knowledge, no one**
 10 **could compile such an exhaustive list.**
 11 Q You said variance?
 12 **A Variance. Not variant. Not multiple variant,**
 13 **but variance and approval through ATF for another company**
 14 **to produce the firearm for us.**
 15 Q How many AR-15s does -- prior to -- So let's
 16 say 2022. How many AR-15s would Piasa Armory have produced
 17 itself?
 18 **A We have only produced 150.**
 19 Q Do you know who the largest AR-15 manufacturer
 20 is in the United States?
 21 **A Not immediately, but with a short search, I'm**
 22 **sure I could find.**
 23 Q Who do you -- What are the companies that you
 24 think might be in that category or close to the top?
 25 **A Immediately I would say Palmetto State Armory.**

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1 Q Any others?
 2 **A Aero Precision. A-E-R-O.**
 3 Q Do you have any sense of how many AR-15s
 4 Palmetto State Armory produces in a given year?
 5 **A I do not.**
 6 Q Is it more than 150?
 7 **A Absolutely.**
 8 Q Do you think it's in the tens of thousands?
 9 **A I would wager it's near six figures.**
 10 Q And out of the 141 manufacturers that are
 11 listed here in this exhibit, based on your knowledge, how
 12 many are in that kind of above 10,000 category of AR-15s
 13 produced each year?
 14 **A I would presume probably 10 percent of the**
 15 **overall list of manufacturers.**
 16 Q And would you agree that the number of
 17 manufacturers of AR-type rifles is a reflection of the
 18 popularity of AR-type rifles?
 19 **A I would.**
 20 Q I'm going to hand you this section of PICA
 21 where it's codified, meaning put in the law books.
 22 (Deposition Exhibit No. 9 marked for
 23 identification.)
 24 MR. MAAG: They had law books hundreds of
 25 years before the codification.

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1 MR. WELLS: True.
 2 MR. MAAG: Thank you.
 3 MR. WELLS: They used to write on sheepskin.
 4 MR. MAAG: Well, I never did.
 5 MR. WELLS: Me either.
 6 Q (By Mr. Wells) All right. I have marked for
 7 identification purposes Deposition Exhibit 9, which I can
 8 represent to you is a printout from the Illinois General
 9 Assembly website of 720 ILCS 5/24-1.9.
 10 Do you recognize that statute?
 11 **A I do.**
 12 MR. WELLS: Oh, I didn't hand it to you.
 13 Q (By Mr. Wells) And do you recognize this to be
 14 a section of PICA?
 15 **A I do.**
 16 Q All right. I'm directing your attention to
 17 the second page. Under subpart J in the middle of the page
 18 and then small Roman numeral ii, two.
 19 MR. MAAG: We're on page two?
 20 MR. WELLS: Yep.
 21 Q (By Mr. Wells) Do you see where it says all
 22 AR-types?
 23 **A I do.**
 24 Q Okay. So I want you to go from -- I want you
 25 to review all of the models that are listed under J, small

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1 Roman two, which it goes from one to 43 on the next page --
 2 **A Uh-huh (yes).**
 3 Q -- and tell me which of the models that are on
 4 this list you do not believe are probably -- properly
 5 characterized as an AR-type.
 6 **A The AR-10, again, is similar, but that would**
 7 **be a -- a different type of system. It operates similarly**
 8 **to an AR-15, but it's larger, different caliber. It has**
 9 **its own platform basically. Parts -- Many parts are not**
 10 **interchangeable, although some are. Items like four, the**
 11 **ArmaLite .22 Carbine. Things like the Beretta AR-70,**
 12 **Bushmaster ACR. The Chiappa firearms M4.**
 13 **So the -- Let's see. So the -- the -- is**
 14 **that -- 36, Sig Sauer 516 and MCX rifles are similar, but**
 15 **have a different operating system. And that would be it.**
 16 Q Okay. So out of the 43 models listed under
 17 section J(ii), you've identified six that you agree -- that
 18 you think are not properly characterized as AR-types; is
 19 that right?
 20 **A Yes.**
 21 Q So is it fair to say that the remaining 37
 22 types listed under J(ii), make and model of particular
 23 rifles, are fairly considered AR-types?
 24 **A Yes. AR-15 types.**
 25 Q All right. I'm going to direct you back to --

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1 We're going to go back and forth with this one a little
 2 bit, so keep it handy.
 3 I want you to go back to your May 19th
 4 declaration, so that's Exhibit 2. And I'm going to direct
 5 your attention to paragraph 21 where you say that,
 6 "ArmaLite M-15 .22 LR carbine is designed to look like an
 7 early prototype AR-15, circa about 1964, by is in" -- I
 8 think you meant "but is in."
 9 **A Correct.**
 10 Q "A different caliber, has no gas system and
 11 completely different operating system and uses different
 12 magazines."
 13 That was your testimony; is that right?
 14 **A Correct.**
 15 Q I'm going to hand you what I'm going to mark
 16 as Deposition Exhibit 10.
 17 (Deposition Exhibit No. 10 marked for
 18 identification.)
 19 Q (By Mr. Wells) Have you seen this document?
 20 **A I have.**
 21 Q What is it?
 22 **A This is the Assault Weapon Identification**
 23 **Guide, and it was put together by the state police.**
 24 Q I'm going to direct your attention to -- Well,
 25 let me ask you this: This Assault Weapon Identification

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1 Guide, is this something that you've looked at and -- for
 2 purposes of running Piasa Armory?
 3 **A Yes.**
 4 Q Directing your attention to page 28, top of
 5 the page next to ArmaLite M-15 .22 LR carbine. Do you
 6 recognize that photograph?
 7 **A I do.**
 8 Q And what is that?
 9 **A That's an ArmaLite M-15 .22 LR carbine.**
 10 Q Why do you believe an ArmaLite M-15 .22 LR
 11 carbine is not an AR-type?
 12 **A Shares cosmetic similarities, but in the same**
 13 **way that a Ruger 10/22, which is pictured also in this**
 14 **document, is not the -- is -- is just dressed up**
 15 **differently than the tactical model that's pictured in this**
 16 **document. So the internals are different.**
 17 Q Do you agree that the rifle depicted on page
 18 28 of Deposition Exhibit 10 next to ArmaLite M-15 .22 LR
 19 carbine is a semi-automatic rifle?
 20 **A Yes.**
 21 Q Do you agree that that same rifle has a
 22 detachable magazine?
 23 **A I do.**
 24 Q Do you agree that that rifle has a pistol
 25 grip?

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1 **A I do.**
 2 Q Do you agree that that rifle has a flash
 3 suppressor?
 4 **A This one does.**
 5 Q Do you agree that the rifle depicted on
 6 page 28 next to ArmaLite M-15 .22 LR carbine -- carbine has
 7 a barrel shroud?
 8 **A I would not call that a barrel shroud. I**
 9 **would call it a hand guard. It's simply meant to protect**
 10 **the barrel so the user doesn't burn themselves while**
 11 **shooting, similar to many other semi-automatic and**
 12 **bolt-action rifles.**
 13 Q And you're referring to the -- I guess you
 14 can't really see the -- the color here. But to shield the
 15 second hand of the user from touching the barrel; is that
 16 right?
 17 **A Correct. Correct.**
 18 Q Because the barrel gets hot?
 19 **A It's the case with every firearm that's fired.**
 20 Q And are you familiar with -- in Deposition
 21 Exhibit 9, which is the provision of PICA, the definition
 22 of assault weapon that uses features?
 23 **A Yes.**
 24 Q Would you agree that the firearm we were just
 25 looking at in Deposition Exhibit 10, the top of page 28,

Page 72

1 the ArmaLite M-15 .22 LR carbine, it has features that are
 2 listed under Section 1.9 (a)1(A)?
 3 **A It does.**
 4 Q You mentioned in your declaration from May 19,
 5 2023, in paragraph 21, that the ArmaLite M-15 .22 LR
 6 carbine uses different magazines. What do you mean?
 7 **A The magazine for the M-15 .22 carbine is only**
 8 **capable of accepting 22 long rifle ammunition, rather than**
 9 **a 223 or 556 ammunition that's common for the AR-15 rifle.**
 10 Q So the caliber of ammunition for the M-15 .22
 11 LR is different than the caliber of ammunition used in most
 12 AR-15 models?
 13 **A Correct.**
 14 Q And in order for a magazine to be able to be
 15 interchangeable, you need to have the same caliber of
 16 ammunition between the two firearms that you're planning to
 17 use that magazine in; is that fair to say?
 18 **A Not necessarily.**
 19 Q Why not?
 20 **A Modern AR-15s are capable of accepting dozens**
 21 **of different calibers of ammunition. Some of those share**
 22 **the same magazines with 223. For example, 50 Beowulf for**
 23 **58 SOCOM -- 458 SOCOM uses a standard 223 magazine.**
 24 Q So there are multiple calibers that can fit
 25 into one magazine; is that fair to say?

Page 73

1 **A Correct.**

2 Q You do have to have at least one overlapping

3 caliber between two firearms to be able to use the same

4 magazine, though; right?

5 **A In general.**

6 Q Is that a yes?

7 **A Yes.**

8 Q All right. Let's go back to your declaration

9 paragraph, paragraph 22. This is the May 19 declaration,

10 Exhibit 2.

11 In paragraph 22, you mentioned the Beretta

12 AR-70. You say, "The Beretta AR-70 has nothing in common

13 with the AR-15 except caliber. And while the AR-15 is made

14 from machined aluminum, the AR-70 is made from largely

15 stamped steel. No parts between the two interchangeable."

16 Is that your testimony?

17 **A Correct.**

18 Q And when we were looking at Exhibit 9, the

19 PICA list and the PICA provisions, you mentioned that the

20 ArmaLite -- I'm sorry -- that the AR-70 is one of -- I'm

21 sorry. The Beretta AR-70 is one of the models listed under

22 Section J(ii) under AR-type that you don't think is

23 properly characterized as an AR-type; is that right?

24 **A Correct.**

25 Q Is it fair to say that the original AR-70 was

Page 74

1 a fully automatic rifle issued to the Italian military?

2 **A Yes.**

3 Q Does the AR-70 use the same caliber of

4 ammunition as the AR-15 chambered in 5.56 NATO?

5 **A Yes.**

6 Q The AR-70 was designed by Beretta, an Italian

7 company; right?

8 **A To my knowledge, yes.**

9 Q To your knowledge?

10 **A Yes.**

11 Q And the -- The Beretta AR-70 was not based on

12 Eugene Stoner's original AR-15 design by ArmaLite?

13 **A I couldn't speak to the design intent of the**

14 **manufacturers, but I would presume no.**

15 Q What is AR and AR-70 mean?

16 **A I do not recall that.**

17 Q Is the AR-70 still in production, to your

18 knowledge?

19 **A Not for civilian consumption and not for**

20 **military consumption, to my knowledge.**

21 Q All right. I'm going to direct your attention

22 back to the ISP guide. So that's Deposition Exhibit 10.

23 Bottom of page 28 where it says Beretta AR-70 with flash

24 suppressor. Do you see that?

25 **A Yes.**

Page 75

1 Q Do you agree that the Beretta AR-70 has a

2 pistol grip?

3 **A I do.**

4 Q Do you agree that the Beretta AR-70 is -- Is

5 there a semi-automatic version of the Beretta AR-70?

6 **A I am sure that there are some automatic**

7 **conversions that have been done on that, but for general**

8 **consumption, it was not produced for the civilian market.**

9 Q So it was not produced for the civilian market

10 and was, in fact, an automatic firearm?

11 **A Correct. Which would be banned by Illinois**

12 **law and federal law.**

13 Q And that automatic ban predates PICA; right?

14 **A Yes.**

15 Q Would you agree that the AR-70 can accept a

16 detachable magazine?

17 **A I do.**

18 Q Does the AR-70 depicted at page 28 of

19 Exhibit 8 have a flash oppressor?

20 **A It appears to.**

21 Q And that's one of the prohibitive

22 characteristics under the PICA definition; is that right?

23 **A It is.**

24 Q Would you agree that, even if this rifle had

25 not been listed under AR-type, it has multiple features

Page 76

1 listed in PICA under subsection 1.9 (a)(1)(A)?

2 **A It does, in similar manner to other rifles.**

3 Q And you also mentioned that most of the AR-70s

4 produced were fully automatic firearms; right?

5 **A Right.**

6 Q Directing your attention to paragraph 23 of

7 your declaration. So we're going back to Exhibit 2. In

8 there, you wrote, "There is no such gun as the Rock River

9 Arms AR-47, but if that is intended to refer to the LAR-47,

10 again, there are substantial differences, including

11 caliber, magazine used and general appearance."

12 That was your testimony?

13 **A Yes.**

14 Q Would you agree that the LAR-47 is an AK-47

15 type rifle?

16 **A I would not.**

17 Q How would you characterize the LAR-47?

18 **A I would characterize it as a derivative of the**

19 **AR-15, designed to take AR-47 style magazines.**

20 Q When you say it's a derivative of the AR-15,

21 what do you mean?

22 **A I mean that it was inspired by, takes design**

23 **elements from, but is not -- is not the same firearm.**

24 Q Why not?

25 **A It uses different magazines, uses different**

Page 77

1 calibers, different receiver styles.

2 Q You said that the LAR-47 takes the AR-15 and

3 changes the caliber, the magazine, and changes it in a way

4 that's towards like AK-47 caliber?

5 A Correct.

6 Q Do you think the LAR-47 could be characterized

7 as an AK-type firearm?

8 A I don't.

9 Q Why not?

10 A Because it's not an AK-type firearm based on

11 the Kalashnikov design.

12 Q Would you agree that the LAR-47 takes design

13 elements from both the AK-47 and the AR-15?

14 A I would.

15 Q So would you characterize the LAR-47 as a bit

16 of a hybrid between an AK-47 and the AR-15?

17 A That's reasonable, yes.

18 Q I'm going to direct your attention to an

19 exhibit that I'm going to mark as Exhibit 11.

20 (Deposition Exhibit No. 11 marked for

21 identification.)

22 Q (By Mr. Wells) Do you recognize this document?

23 A I have not seen it before today, but I

24 recognize it as Rock River Arms' website.

25 Q So I can represent to you it's a screen shot

Page 78

1 of Rock River Arms' website specifically relating to the

2 LAR-47?

3 A Yes.

4 Q Do you see the URL listed up there that says

5 RockRiverArms.com?

6 A I do.

7 Q Do you agree that the firearm depicted in

8 Deposition Exhibit 11 is an LAR-47?

9 A I would agree.

10 Q Do you agree that this is a semi-automatic

11 rifle?

12 A It appears to be, yes.

13 Q Do you agree that the rifle depicted in

14 Deposition Exhibit 11 has a detachable magazine?

15 A It does.

16 Q And do you agree that the rifle depicted in

17 Deposition Exhibit 11 has a pistol grip?

18 A It does.

19 Q Do you agree that the rifle depicted in

20 Deposition Exhibit 11 has a flash suppressor?

21 A It appears to have a compensator, not a flash

22 suppressor.

23 Q What's the difference between a compensator

24 and a flash suppressor?

25 A A compensator's made to mitigate recoil felt

Page 79

1 by the shooter. A flash oppressor is designed to mitigate

2 flash seen by the shooter.

3 Q Do you agree that the LAR-47 has a barrel

4 shroud as depicted in Deposition Exhibit 11?

5 A Again, I would consider that a hand guard

6 meant to prevent the user from burning themselves while

7 shooting. A barrel shroud, other than PICA, to my

8 knowledge, doesn't have a solid definition.

9 Q Do you agree that the rifle depicted in

10 Deposition Exhibit 11 has a telescoping or adjustable

11 stock?

12 A It appears to.

13 Q Would you agree that the rifle depicted in

14 Deposition Exhibit 11 would qualify as an assault weapon

15 under the features-based definition in PICA?

16 A Yes.

17 Q I'm going to direct your attention back to the

18 ISP guide, so Deposition Exhibit 10. Directing your

19 attention to page 39, do you see where it says Anderson

20 AM-15 BR?

21 A I do.

22 Q And that's listed under other, quote, AR-type,

23 close quote, rifles as defined by the Protecting Illinois

24 Communities Act. Do you see that?

25 A I do.

Page 80

1 Q Would you agree that the Anderson AM-15 BR is

2 an AR-type rifle?

3 A Yes. AR-15 type rifle.

4 Q Directing your attention to the next rifle

5 underneath that, next to Ruger AR 556 MPR with M-Lok rail.

6 Do you recognize the firearm depicted immediately to the

7 right of that language as a Ruger AR-50 -- 56 MPR?

8 A I do.

9 Q Would you agree that that's an AR-type rifle?

10 A That's an AR-15 type rifle, yes.

11 Q And in the Ruger name, Ruger AR-556, what do

12 you understand the 556 to refer to?

13 A The typical caliber that it is sold in. So

14 5.56 NATO.

15 Q And even though Ruger is calling it a Ruger

16 AR-556, you still recognize it to be an AR-15 type rifle?

17 A I do.

18 Q Directing your attention to the next firearm

19 depicted next to the language "Springfield Armory SAINT

20 Victor." Do you see that?

21 A I do.

22 Q Do you agree that that's an AR-type rifle?

23 A AR-15 type, yes.

24 Q Directing your attention to the next firearm

25 depicted on page 39 next to Radical Firearms, RF-15 SOCOM.

Page 81

1 Do you recognize that rifle?

2 **A I do.**

3 Q Do you recognize it as a Radical Firearms

4 RF-15 SOCOM?

5 **A Radical Firearms is a wide product variety,**

6 **product offering in many variants, but it looks like one of**

7 **their firearm styles, yes.**

8 Q Would you agree that the firearm depicted at

9 the bottom of page 39 next to Radical Firearms is an AR-15?

10 **A It appears to be, yes.**

11 Q Would you at call it an AR-type rifle?

12 **A I would call it an AR-15 type rifle, yes.**

13 Q I want you to look through pages 40 through

14 42. And after you've had a chance to look at those, I want

15 you to tell me whether the rifles depicted on those pages

16 are all AR-15 type rifles.

17 **A They appear to be.**

18 Q So you would agree with me that the rifles

19 depicted on pages 39 to 42 of Deposition Exhibit 10, the

20 Illinois State Police Assault Weapons Identification Guide,

21 all of those rifles depicted are AR-15 type rifles;

22 correct?

23 **A Yes.**

24 Q And all of those rifles are AR-type rifles;

25 right?

Page 82

1 **A Of the Stoner design, yes.**

2 Q All right. One more on ARs and then --

3 **A Okay.**

4 Q We're not done yet.

5 **A Sure.**

6 Q If you need a break, too, by the way, just let

7 me know.

8 (Deposition Exhibit No. 12 marked for

9 identification.)

10 Q (By Mr. Wells) I'm going to show you what I'm

11 marking as Deposition Exhibit 12.

12 MR. MAAG: Thank you.

13 Q (By Mr. Wells) You mentioned earlier that you

14 have been to Pew Pew Tactical's website; is that right?

15 **A Yes.**

16 Q I can represent to you that these are screen

17 shots from Pew Pew Tactical's website. Let me direct your

18 attention to the second page. Do you see where it says,

19 "The Modern AR-15?"

20 **A I do.**

21 Q Do you see underneath that it says, "It used

22 to be really easy. Head down to your local gun shop and

23 choose from the two or three ARs they have on the shelf,

24 but those days are long gone. Now you're bombarded with

25 too many choices."

Page 83

1 Do you understand what's meant here by ARs?

2 **A I do. AR-15s.**

3 Q Do you agree with what this -- these couple of

4 sentences say?

5 **A Yes.**

6 Q And how do you understand what's being

7 described here?

8 **A This -- That there are many variants of the**

9 **AR-15 that are produced under different names by different**

10 **manufacturers, but are substantially similar.**

11 Q And did it always -- Has it always been the

12 case that there are a lot of AR-15 manufacturers?

13 **A From my time in firearms, yes. However, I**

14 **was -- My time in firearms began after the sunset of the**

15 **Clinton assault weapons ban.**

16 Q So there was a period of time when most gun

17 shops would carry two or three AR-type rifles; is that

18 right?

19 **A Correct. Twenty-plus years ago.**

20 Q How many different types of AR-rifles do you

21 carry at Piasa Armory?

22 **A As many as are manufactured and supplied by**

23 **our distributors.**

24 Q Do you have any idea of the number of

25 manufacturers of AR-15s that you offer at Piasa?

Page 84

1 **A I would assume in the neighborhood of 50.**

2 Q Okay. Why don't we take a short break.

3 **A Sure.**

4 THE VIDEOGRAPHER: This is the videographer.

5 We are going off the record. The time now is 3:42.

6 (Whereupon, a short break was taken.)

7 THE VIDEOGRAPHER: This is the videographer.

8 We are back on the record. The time now is 3:49.

9 Q (By Mr. Wells) Mr. Pulaski, I'd like to direct

10 your attention back to your May 18th declaration,

11 paragraph 26. In paragraph --

12 MR. MAAG: Which paragraph?

13 MR. WELLS: Twenty-six.

14 Q (By Mr. Wells) In paragraph 26, you wrote,

15 "Likewise, there are no objective standards to determine

16 whether a given firearm is an AK-type, an AR-type or

17 something else. In fact, even the listed examples are

18 oftentimes not within the parameters of what even most

19 firearms experts would consider to be an AK-type like the

20 SKS or an AR-type."

21 I switched that "of" to an "or" because it was

22 a typo; right?

23 **A Correct.**

24 Q You do believe there are parameters for what

25 most firearms experts would consider an AK-type; correct?

Page 85

1 **A I do.**

2 Q In your mind, what are the parameters that

3 most firearms experts would consider to be an AK-type?

4 **A Those would be of the design of the original**

5 **AK-47 designed by Kalashnikov. So basically, a civilian**

6 **semi-automatic variant of the military fully automatic**

7 **AK-47.**

8 Q What does AK stand for?

9 **A Automatic Kalashnikov.**

10 Q What language is that?

11 **A Russian.**

12 Q What does the Avtomat mean?

13 **A Automatic.**

14 Q And what does Kalashnikov mean?

15 **A Rifle designed by Kalashnikov, basically.**

16 Q And who is Kalashnikov?

17 **A Kalashnikov was a Russian military tanker,**

18 **while injured, designed the AK-47 in competition with the**

19 **SKS designer.**

20 Q Who was the SKS designer?

21 **A Simonov.**

22 Q Where was Simonov from?

23 **A Also from Russia.**

24 Q You said that Kalashnikov and Simonov were in

25 competition from -- with one another. What do you mean by

Page 86

1 that?

2 **A They were designing rifles at the same time,**

3 **or similar time, attempting to have their designs adopted**

4 **by the Russian military as a whole.**

5 Q What does the AK -- What does the 47 refer to

6 in AK-47?

7 **A The year that the design was adopted.**

8 Q I'm directing your attention to paragraph 13

9 of your May declaration. In paragraph 13, you wrote, "As

10 to the named firearms in the Illinois ban, as I previously

11 stated, I'm familiar with both the AK or Soviet Avtomat."

12 MR. MAAG: Avtomat.

13 Q (By Mr. Wells) You meant Avtomat there; is

14 that right?

15 MR. MAAG: Well, Avtomat is how it's

16 pronounced.

17 Q (By Mr. Wells) But it's spelled A-V-T-O.

18 **A In the English translation.**

19 Q Is that right?

20 **A Yes.**

21 Q Or Soviet Avto Kalashnikov?

22 MR. MAAG: Kalashnikov.

23 Q (By Mr. Wells) You meant to write Kalashnikov?

24 **A Missing the S in there. Yes.**

25 Q Series of rifles, which is a 1947 Soviet

Page 87

1 design select fire shoulder-fired weapon that under federal

2 law would be a machine gun.

3 So the original AK-47 would be a machine gun

4 under federal law because it's fully automatic?

5 **A And select fire, yes.**

6 Q You agree there is such a thing as the AK

7 series of rifles; correct?

8 **A There is an entire collection in family of**

9 **firearms based on the AK-47 design.**

10 Q Would you agree that the AK-47 is one of the

11 most famous weapons in the world?

12 **A It is.**

13 Q And there have been many, tens of millions, of

14 AK-47s produced?

15 **A Produced, yes. But as far as imported into**

16 **this country, not nearly that many.**

17 Q So I'm going to read you a statement, and I

18 want you to let me know if you agree with it.

19 "After more than seven decades since its

20 creation, the AK-47 model and its variants remain one of

21 the most popular and widely used firearms in the world."

22 Do you agree with that?

23 **A Yes.**

24 Q You mentioned earlier, I believe, you own an

25 AK-47?

Page 88

1 **A I own a Romanian WASR-10.**

2 Q But you consider the Romanian WASR-10 to be an

3 AK-47?

4 **A To somebody who doesn't have experience with**

5 **firearms, they would say it was an AK variant. However,**

6 **it's an AKM, which is similar to the AR-15 versus the M-16.**

7 **It's cosmetically similar, but different.**

8 Q What does AKM stand for?

9 **A I do not recall the M at this time.**

10 Q What do the AK in AKM stand for?

11 **A Typically, it stands for Avtomat Kalashnikov.**

12 Q Same thing as -- Same meaning as an AK-47; is

13 that right?

14 **A Correct.**

15 Q What is an AK-74?

16 **A AK-74 is a modern redesign of the AK-47, which**

17 **is part of the AK family. It uses different ammunition.**

18 Q You say different ammunition. What do you

19 mean?

20 **A The standard AK-47 uses 762 by 39. The AK-74**

21 **uses 545 by 39. It's a Soviet attempt to have a similar**

22 **military round to the United States.**

23 Q In the name AK-74, what does the AK?

24 **A Avtomat Kalashnikov.**

25 Q What does 74 mean in AK 74?

Page 89

1 **A That would be the year that it was adopted for**
 2 **wide use in the military.**
 3 Q And was Kalashnikov the same person who
 4 designed the AK-47 also the person who designed the AK-74?
 5 **A I don't recall, but I presume that it was.**
 6 Q What is an AK-56?
 7 **A I don't recall.**
 8 Q Do you know what a type 56 rifle is?
 9 **A I'd say a Chinese variant of the Kalashnikov**
 10 **design.**
 11 Q When you say variant, what do you mean?
 12 **A The Chinese are famous for copying designs of**
 13 **Russian firearms, vehicles, any other equipment, and making**
 14 **them for their military with changes that are suitable for**
 15 **their military.**
 16 Q I'm going to direct your attention back to
 17 Section 1.9 --
 18 **A Okay.**
 19 Q -- of PICA provisions. So Deposition
 20 Exhibit 9. We're going to go to page two, capital J,
 21 little I.
 22 **A Uh-huh (yes).**
 23 Q Where it says, "All AK types." Do you see
 24 that?
 25 **A Yes.**

Page 90

1 Q And then under the little I, there is Roman
 2 numerals one through six. Do you see that?
 3 **A Yes.**
 4 Q And under Roman numeral one, there are several
 5 numbers and letters listed. I want you to look at Roman --
 6 capital Roman numeral one through six, and tell me which of
 7 the firearms listed here you don't think -- or you -- Let
 8 me strike that and start over.
 9 I want you to look at J little I Roman
 10 numerals one through six and tell me which of the firearms
 11 listed here you believe are not properly characterized as
 12 AK-types.
 13 **A Anything that is not a traditional AK-47,**
 14 **AK-74 or the other Russian military variant would not be an**
 15 **AK-type. It would be an AKM variant, typically, for the**
 16 **civilian market.**
 17 Q So give me the specific model numbers here
 18 that are listed that you think are not properly
 19 characterized as A -- AK-types.
 20 **A Sure. So things like the MAK-90, the MISR,**
 21 **NHM90, NHM91, SA-93, the Vector, VEPR, WASR-10, the Maadi,**
 22 **and Norinco items, and the SKS.**
 23 Q So of these models, how many of these did you
 24 identify in your declaration of -- the two declarations
 25 that you prepared in this case?

Page 91

1 **A I don't recall. Specifically, the SKS and --**
 2 **but the AK variant was not a focus necessarily as much as**
 3 **the SKS was.**
 4 Q What has changed between when you prepared
 5 your two sworn statements and today where now you're adding
 6 additional firearms that you didn't identify in your
 7 declaration that you don't believe are properly
 8 characterized as AK-types?
 9 **A The AK-types are not -- I'm thinking of how to**
 10 **phrase this properly. Sorry.**
 11 **Again, it's similar to AR -- AR-15s and**
 12 **M-16's, the AK-types, the -- the original manufactured**
 13 **design for Kalashnikov, the military variant, is what's**
 14 **typically referred to as the AK or the AK-47, but those**
 15 **variants are similar. But civilian market variants, the**
 16 **AR-15 versus the M-16.**
 17 Q So are the ones that you identified, like the
 18 MAK90, are those -- is that available in the civilian
 19 market in the United States?
 20 **A Not in this state anymore. The AK-90 was**
 21 **available minorly, but not widely in just one of the many**
 22 **variants was out there.**
 23 Q What does MAK stand for and MAK90?
 24 **A I don't recall.**
 25 Q Does the AK stand for Avtomat Kalashnikov?

Page 92

1 **A One could presume that.**
 2 Q And you said it wasn't a big presence here in
 3 the United States or something like that. What did you
 4 mean?
 5 **A Typically, items like the WASR-10, which were**
 6 **brought over in kit form and produced by a major**
 7 **manufacturer, were the prevalent variant of the AK-47, copy**
 8 **of the AK-47.**
 9 Q So the WASR-10, you would agree, is a copy of
 10 the AK-47?
 11 **A It's a civilian legal copy, yes.**
 12 Q And just so I understand, the distinction
 13 you're making is that the AK-47 is an automatic weapon
 14 and --
 15 **A Correct.**
 16 Q Is that correct?
 17 **A Correct.**
 18 Q And some of these are semi-automatic weapons?
 19 **A Anything but the AK-47 and AK-74 in the**
 20 **civilian market are civilian weapons.**
 21 Q Do you think that a -- like a Palmetto State
 22 Armory AK-47 variant that's semi-automatic is properly
 23 characterized as an AK-47?
 24 **A It's not a machine gun as the original AK-47**
 25 **was. So it's a derivative, yes, but it's not a variant.**

Page 93

1 Q So you would only use the term AK-47 to apply
 2 to fully automatic firearms?
 3 A In definitional terms, yes. But in jargon,
 4 not necessarily.
 5 Q So out there in the world, if you have
 6 customers who come into Piasa Armory and they say I want an
 7 AK-47, do you -- do you show them semi-automatic AK-47s?
 8 A We show them some variant of the AK that's
 9 civilian legal, like the WASR-10, or direct them to
 10 Palmetto State Armory for their PAS AK-47.
 11 Q So a customer who would use AK-47 in that
 12 context who would refer to a semi-automatic, you would
 13 understand what they meant?
 14 A I would, yes.
 15 Q The NHM-90, why is that -- why do you consider
 16 that to be something other than an AK-type firearm?
 17 A Because it's not an AK-47.
 18 Q Why not?
 19 A That's not a -- not a Russian military issued
 20 AK-model 47.
 21 Q What is it?
 22 A That's -- I -- I'm sorry. I don't recall what
 23 that specific one is manufactured -- who it's manufactured
 24 by. But it's just one of the other many civilian legal
 25 varieties, copies of the AK-47.

Page 94

1 Q So you would agree that NHM-90 is a civilian
 2 legal variant of the AK-47?
 3 A A copy, yes. Not a -- Not a variant
 4 necessarily, but a derivative of.
 5 Q Would you also agree that the MAK-90 is a
 6 civilian legal variant of the AK-47?
 7 A Possibly.
 8 Q Is that a yes?
 9 A Yes.
 10 Q Is the SA-85 a civilian legal variant of the
 11 AK-47?
 12 A It could be.
 13 Q Is that a yes?
 14 A Yes.
 15 Q Is the SA-93 a civilian legal variant of the
 16 AK-47?
 17 A A copy, yes.
 18 Q The VEPR. Is the VEPR a civilian legal
 19 variant of the AK-47?
 20 A A similar, yes.
 21 Q And we mentioned the WASR-10. You agree that
 22 that is a civilian legal variant of the AK-47?
 23 A Correct.
 24 Q How about the Maadi AK-47, what is that?
 25 A The Maadi is an Egyptian copy of the AK-47,

Page 95

1 and several parts kits were imported and converted to
 2 civilian use to not -- no longer be automatic and legal
 3 with federal law.
 4 Q Can civilians outside of Illinois and
 5 elsewhere in the United States acquire Maadi AK-47s in
 6 semi-automatic form?
 7 A I believe they can.
 8 Q What is a Norinco 56S?
 9 A A Norinco is a Chinese manufacturer that made
 10 copies of the AK-47. The Norinco models that came to the
 11 United States were semi-automatic.
 12 Q And you say came to the United States, are
 13 they still coming to the United States?
 14 A No.
 15 Q When did that stop?
 16 A To my knowledge, that was in the '90s, during
 17 the changes to federal import laws.
 18 Q So of today, you're not aware of any Norinco
 19 56Ss being legally imported into the United States?
 20 A To my knowledge, no.
 21 Q And would that also apply to the 56S2?
 22 A Any Norinco product, to my knowledge.
 23 Q And it would also apply to the 84S?
 24 A Correct.
 25 Q And the 86S from Norinco?

Page 96

1 A Correct.
 2 Q Why do you think the SKS is not properly
 3 characterized as an AK-type?
 4 A Because it's an SKS and not an AK.
 5 Q What's different about the two firearms?
 6 A The entire operating system is different. The
 7 AK uses a single piston. The SKS uses multiple. SKS uses
 8 internal magazines, where the AK-47 uses detachable
 9 magazines.
 10 Q Does the SKS use the same caliber of
 11 ammunition as the AK-47?
 12 A It does.
 13 Q And does the SKS, was it created in the same
 14 country as the AK-47?
 15 A Yes.
 16 Q And what country was that?
 17 A Russia or the Soviet Union.
 18 Q All right. I'm going to direct your attention
 19 back to the ISP guide. Directing your attention to
 20 Deposition Exhibit 10, pages 25 to 26.
 21 Do you see at the top of page 25, it says,
 22 "Other AK-type rifles as designed -- as defined by the
 23 Protecting Illinois Communities Act."
 24 Do you see that?
 25 A Yes.

Page 97

1 Q And the top of the page there, page 25, it
 2 says, "Palmetto State Armory -- Armory, PS AK-47 GF3."
 3 Do you see that?
 4 **A Yes.**
 5 Q You mentioned earlier that if a customer came
 6 in asking for an AK-47, you might direct them to Palmetto
 7 State Armory; is that right?
 8 **A Correct.**
 9 Q And is this one of the types of AK models that
 10 you would direct them to?
 11 **A Yes.**
 12 Q And is that because the PS AK-47 GF3 is a
 13 semi-automatic civilian version of the AK-47?
 14 **A That's a civilian copy of it, yes.**
 15 Q And looking at the PS AK-47 GF3 at the top of
 16 page 25, as far as you can tell, it's a semi-automatic
 17 rifle?
 18 **A It appears to be.**
 19 Q And it has a detachable magazine?
 20 **A It does.**
 21 Q Does it also have a pistol grip?
 22 **A It does.**
 23 Q Does it have a flash suppressor?
 24 **A It does not.**
 25 Q Does it have an adjustable stock?

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1 **A This does not appear to be.**
 2 Q But you would agree that the PS AK-47 GF3 is
 3 properly called an AK-type firearm?
 4 **A I would call it a copy of the AK firearm.**
 5 Q Direct your attention to the next firearm down
 6 the page, so the second from the top. The Century Arms VS
 7 KA. Do you agree that that's an AK-type firearm?
 8 **A It's a -- again, a civilian copy of the AK.**
 9 Q As far as you can tell, is it a semi-automatic
 10 rifle?
 11 **A It appears to be.**
 12 Q Does it have a detachable magazine?
 13 **A It does.**
 14 Q Does it have a pistol grip?
 15 **A It does.**
 16 Q Moving down to the Kalashnikov USAKR 103. Do
 17 you see that?
 18 **A I do.**
 19 Q Would you disagree that the Kalashnikov USAKR
 20 103 is an AK-type firearm?
 21 **A It's a copy of them, yes.**
 22 Q All right. I'd like you look at pages 25 and
 23 26. And I would like you to tell me if there are any
 24 firearms depicted here that you would not consider an
 25 AK-type firearm?

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1 **A I would consider these to be copies of the**
 2 **AK-type firearms with -- some with modernized features and**
 3 **not holding true to the original design of the AK-47.**
 4 Q You would at least agree that all the firearms
 5 depicted on pages 25 to 26 of Deposition Exhibit 10 are
 6 copies of the AK in some degree?
 7 **A Some variance or derivative of.**
 8 Q That's a yes?
 9 **A Yes.**
 10 Q You can set that to the side for a second.
 11 (Deposition Exhibit No. 13 marked for
 12 identification.)
 13 Q (By Mr. Wells) I'm handing you what's been
 14 marked as Deposition Exhibit 13, which I can represent to
 15 you is a printout of information from Palmetto State
 16 Armory's website, and specifically, the web page relating
 17 to the PS AK 47 G5 Forge classic rifle. Do you see that?
 18 **A I do.**
 19 Q Do you recognize the firearm depicted on
 20 page one of Deposition Exhibit 13?
 21 **A This particular one, no, but the overall**
 22 **design of Palmetto State Armory's AK pattern, AK style**
 23 **derivative rifles, yes.**
 24 Q Are you familiar with something called an AKP
 25 from Palmetto State Armory?

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1 **A I believe that refers to their AK-47 variant**
 2 **pistols.**
 3 Q What is an AK-47 variant pistol?
 4 **A Those are firearms that were designed as a**
 5 **handgun without a stock or with shorter barrels.**
 6 Q What makes the AKP from Palmetto State Armory
 7 an AK-47 variant pistol?
 8 **A The fact that it has no stock, was designed as**
 9 **a handgun from the start, was not built from a rifle or a**
 10 **full-size firearm, and has that shorter barrel on it.**
 11 Q And those are the reasons why it would be
 12 classified as a pistol; right?
 13 **A Correct.**
 14 Q What are the reasons why the AKP from Palmetto
 15 State Armory would be characterized as an AK?
 16 **A Because it's the -- shares all of the same**
 17 **characteristics as their PS AK-47 rifle, other than legal**
 18 **requirements.**
 19 Q So other characteristics would include things
 20 like the same caliber as AK-47?
 21 **A Correct.**
 22 Q What else?
 23 **A Same operating system, same magazines, similar**
 24 **pistol grips, trigger, and hammer -- fire control groups.**
 25 Q All right. Let's go back -- I diverted us,

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1 but back to Exhibit 13. I'm going to direct your attention
 2 to page three. The text in the middle of the page, the
 3 kind of last text before --
 4 **A Yes.**
 5 Q -- it stops.
 6 Do you see where it says, "As we are
 7 transitioning to Soviet arms, your receivers may be stamped
 8 with our new AK Soviet arms logo on firearms manufactured
 9 after March 8th, 2023. This will not affect the quality or
 10 function of the firearm as they are the same AK receivers
 11 used for our AKs."
 12 You understand what Palmetto State Armory is
 13 saying here when it says AKs; right?
 14 **A I do. That's their model name.**
 15 Q And their model name refers to civilian
 16 variants of the AK-47?
 17 **A Civilian copies, yes.**
 18 Q I keep saying variants, you keep saying
 19 copies. Why -- why are you correcting --
 20 **A A variant would be something like the AK-74 or**
 21 **something that would be a light machine gun variant of the**
 22 **traditional AK-47s. Something like a longer barrel where**
 23 **it would take a drum or a belt magazine or belt feeding**
 24 **device, something that might be a precision rifle variant**
 25 **of it. In the same way that a Toyota Camry has a variety**

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1 **of model options, those are variants of that same base**
 2 **model.**
 3 Q So, in your mind, copy is actually closer to
 4 the original?
 5 **A Not necessarily. Copies can be -- They may**
 6 **make changes that are functionally or cosmetically**
 7 **different to modernize. Or like -- I believe this one was**
 8 **trying to be as close to a classic AK-style, the wood**
 9 **furniture that's on the gun, that kind of darker color**
 10 **that's out there. So it's just trying to be a copy of the**
 11 **original but still be within the rules, regulations,**
 12 **civilian legal, but not necessarily a variant of the same**
 13 **gun.**
 14 Q The look and feel of the original AK-47; is
 15 that fair?
 16 **A Match the style, yes.**
 17 Q And capability; right? Aside from the
 18 automatic capability and the, you know, select fire
 19 capability, other than that, roughly the same?
 20 **A Functionally in single fire, one shot at a**
 21 **time, semi-automatic mode, yes, they'd be very similar,**
 22 **yes. And I believe that last paragraph on page three**
 23 **refers to a branding change, not a manufacturer change.**
 24 Q All right. Let's just look at the same
 25 exhibit, page seven.

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1 MR. MAAG: Of?
 2 MR. WELLS: The same exhibit, Deposition
 3 Exhibit 13.
 4 Q (By Mr. Wells) So do you understand what you
 5 see here to be comments from visitors to the website
 6 commenting on the Palmetto State Armory or PSA AK-47 GF 5?
 7 **A Yes.**
 8 Q Under another PSA winner, do you see where it
 9 says, "My first AK, and it is a beauty?" Do you see that?
 10 **A I do.**
 11 Q And do you understand what AK means in that
 12 sentence?
 13 **A As a member of the industry, yes. I can also**
 14 **see from this that person's very new to the industry and**
 15 **firearms as a whole it appears.**
 16 Q Do -- do you believe -- In your experience at
 17 Piasa Armory, do customers use the phrase AK as a reference
 18 to civilian versions of the AK-47?
 19 **A In general, our customer base tends to shorten**
 20 **terms. So somebody may refer to an AK but mean an AK-47**
 21 **copy or an AK-74 copy or a 12-gauge copy of the AK,**
 22 **referring to the Saiga shotguns or any other similar**
 23 **shotguns of that same cosmetically similar design.**
 24 Q All right. Let's see. You mentioned that you
 25 sometimes go to AR-15.com; is that right?

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1 **A I do.**
 2 Q And you sometimes review the -- what people
 3 have posted there; is that right?
 4 **A I do.**
 5 (Deposition Exhibit No. 14 marked for
 6 identification.)
 7 Q (By Mr. Wells) I'm marking Deposition
 8 Exhibit 14. Do you recognize this?
 9 **A I recognize this as AR-15.com, yes.**
 10 Q So these are screen shots from AR-15.com. You
 11 can see the URLs at the top. And on the first page of
 12 Deposition Exhibit 14, do you recognize this as the -- the
 13 main page of AR-15.com?
 14 **A It appears to be.**
 15 Q And do you see where it says discussion forums
 16 and there's a drop down menu?
 17 **A I do.**
 18 Q And one of the discussion forums listed is
 19 AK-47. Do you see that?
 20 **A I do.**
 21 Q And in your experience going to AR-15.com, do
 22 folks come to AR-15.com to participate in the discussion
 23 forums to talk about AK-47s?
 24 **A I would presume that they do. I tend to focus**
 25 **more on the AR-15 side of the AR-15.com forums.**

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1 Q So if you were looking to answer a specific
 2 question, as you said you sometimes do with AR-15.com,
 3 about AKs and you came to this website, and you went to the
 4 AK-47 forums, you would click on that discussion forum
 5 where it says AK-47; is that fair to say?
 6 **A If I was looking for information on copies of**
 7 **the AK, yes.**
 8 Q So I'd like to direct your attention to the
 9 last page of the exhibit.
 10 **A Okay.**
 11 Q And looking at the URL at the top, can you
 12 tell that this is from AR-15.com?
 13 **A Yes.**
 14 Q And it's specifically the AK-47 page from
 15 AR-15.com?
 16 **A Yes.**
 17 Q And here it says new AK products. Do you see
 18 that?
 19 **A I do.**
 20 Q You understand what that means; right?
 21 **A I do, yes.**
 22 Q And AK discussions is the next topic. Do you
 23 see that?
 24 **A Yes.**
 25 Q You understand what that means?

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1 **A That appears to be discussions about anything**
 2 **relevant to AK platform, copies, variants.**
 3 Q And -- and following that row over, do you see
 4 it says topics 5,600 and -- I'm sorry, 56,970. Do you see
 5 that?
 6 **A I do.**
 7 Q So would you agree that, at least as of the
 8 time of this screen shot, there were apparently 56,970
 9 topics under the AK discussions label?
 10 **A I would.**
 11 Q Do you see where it says, replies right under
 12 topics?
 13 **A I do.**
 14 Q And it says 632,806?
 15 **A Yes.**
 16 Q So is -- Based on that, there appeared to have
 17 been 632,806 comments grouped under AK discussions; is that
 18 fair?
 19 **A Yes.**
 20 Q So based on that, do you think the average
 21 person coming to AR-15.com to go to a discussion forum on
 22 the AK would understand that AK discussions is a reference
 23 to AK-47 type firearms?
 24 **A That would be reasonable, yes.**
 25 Q Okay. Let's see. Let's talk about

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1 interchangeability. Direct your attention to your May 19
 2 declaration, paragraph eight. This is Deposition
 3 Exhibit 2.
 4 In paragraph eight, you wrote "That is it." I
 5 assume you meant "that it is"; right?
 6 **A Yes.**
 7 Q "So that it is objectively impossible to
 8 determine whether a given magazine, feed strip, or other
 9 ammunition feeding device is for a rifle, shotgun, handgun
 10 or something else simply by looking at the device."
 11 Is that your testimony?
 12 **A Correct.**
 13 Q Your concern is that if I handed you a
 14 magazine by itself, and you had no other information to go
 15 on other than looking at the magazine, you could not say
 16 whether the magazine was for a handgun or a rifle; is that
 17 right?
 18 **A It depends on the magazine, but possibly, yes.**
 19 Q And that's the concern you're identifying in
 20 paragraph eight?
 21 **A Correct.**
 22 Q If you were handed a magazine with no other
 23 information, by looking at the magazine, are there things
 24 that you could tell about that particular magazine?
 25 **A I could assume that the caliber and make a**

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1 **presumption of what model it was originally intended for.**
 2 **However, many firearms share the same magazines both in**
 3 **pistol and rifle variants.**
 4 Q So you would be able to look at a magazine
 5 and -- and tell the caliber?
 6 **A Potentially. But there are many calibers that**
 7 **are very similar, and it's not a -- a guarantee for many --**
 8 **a specific firearm or magazine.**
 9 Q Is it fair to say that you would be able to
 10 look at a magazine that was just handed to you with no
 11 other information and have a rough sense of what caliber
 12 would be used in that magazine?
 13 **A Potentially, but again, it depends on the**
 14 **particular magazine.**
 15 Q Do you agree that not all magazines can be
 16 used in all firearms?
 17 **A Yes.**
 18 Q For example, you can't use a Beretta M-92
 19 9-millimeter magazine in a 5.56 NATO caliber AR-15;
 20 correct?
 21 **A In an AR-15 chambered for 5.56, no. But you**
 22 **can use a Beretta .92 magazine in an AR-15 that is**
 23 **chambered for 9-millimeter.**
 24 Q Right. But you'd have to know what caliber of
 25 ammunition you're going to use in that AR-15; right?

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1 **A You would.**

2 Q If you had a 5.56 NATO AR-15 and you attempted

3 to use 9-millimeter ammunition in it, what would happen?

4 **A Well, the firearm may not function, and if it**

5 **did, it could cause damage or injury.**

6 Q What kind of damage or injury?

7 **A The -- Well, when a -- when a bullet is shot,**

8 **it produces explosive gas, flame that -- and pressure. And**

9 **if that were to not be contained in the chamber of the**

10 **firearm, which wouldn't be possible with 9-millimeter going**

11 **into a 223 or 556 firearm, then that would go into the path**

12 **of least resistance.**

13 Q For two firearms to be able to use the same

14 magazine, the firearms at least have to use the same

15 caliber of ammunition; is that fair to say?

16 **A No.**

17 Q Is it fair to say that the two firearms, if

18 they're going to use the same magazine, have to share at

19 least one common caliber of ammunition that they use?

20 **A Not necessarily. Example again is the 556,**

21 **223 and the 50 Beowulf, 458 SOCOM, 223, a 30-round magazine**

22 **only accommodates nine to 10 rounds of 50 Beowulf or 58**

23 **SOCOM.**

24 Q So you're talking about the magazine. I'm

25 asking about the firearm.

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1 **A Okay.**

2 Q So in order for one firearm chambered in a

3 specific caliber to have a magazine that can be used in

4 another firearm chambered in a caliber, there has to be at

5 least one common caliber between those two firearms;

6 correct? For the magazine to function?

7 **A Well, if both fire -- I'm sorry. I guess I'm**

8 **not understanding clarity-wise. But if you have an AR-15**

9 **that is chambered in 223 and an AR-15 that we chambered in**

10 **50 Beowulf or 58 SOCOM, those don't share the same caliber,**

11 **of course, but they do share the same magazine.**

12 **And cosmetically, the magazine is no different**

13 **between the same firearms. You could use all of the**

14 **ammunition -- load that magazine with 223 or 556, fire it**

15 **in that firearm that was chambered for 223 or 556. Use the**

16 **same exact magazine, load it with 50 Beowulf, 458 SOCOM,**

17 **the appropriate caliber for that second firearm, and then**

18 **fire with that same magazine with that lower capacity.**

19 Q The weapons that you just described, are all

20 of those weapons assault weapons under PICA?

21 **A Potentially, but not necessarily.**

22 Q And you're talking about calibers and

23 ammunition that can be used in magazines that will fit in

24 rifles that can take large caliber ammunition, like the

25 Beowulf, for instance; right?

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1 **A Correct.**

2 Q So in that example, neither one of those

3 firearms, if you had a Beretta M-92 9-millimeter, you

4 couldn't use it in those firearms you just -- you just

5 described, you couldn't use that magazine?

6 **A Correct.**

7 Q Do you agree that there's some calibers that

8 are more commonly used in rifles than in handguns?

9 **A Yes. However, that doesn't necessarily mean**

10 **that a caliber is exclusively for a handgun or a rifle.**

11 **For example, a 9-millimeter is a very common caliber in**

12 **rifles and in handguns. .22 caliber, similar.**

13 Q 6.5 Grendel, is that more common as a rifle or

14 handgun ammunition?

15 **A We've seen both as -- from our customer base.**

16 **A bolt pistol handgun variant AR-15, copy AR-15s, and rifle**

17 **copy AR-15s.**

18 Q Which would you say is more prevalent, rifles

19 that use 6.5 Grendel or handguns that use 6.5 Grendel?

20 **A In this particular area, handguns, just based**

21 **on our geography and lack of available areas to use those**

22 **firearms.**

23 Q What about a 338 Lapua? Are you familiar with

24 any handgun that uses 338 Lapua ammunition?

25 **A I believe that a company has produced**

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1 **something that would be considered a handgun without a**

2 **stock with a shorter barrel and only pistol grip.**

3 Q What kind of Walther again?

4 **A It is a PPQ Q5 match.**

5 Q In your experience, is Walther a good firearm?

6 **A A reputable brand and quality manufacturer,**

7 **yes.**

8 Q And you, as a firearms expert or someone who

9 just knows a lot about firearms, in terms of picking a

10 firearm that you're going to carry around with you to

11 defend yourself, you're going to choose carefully; right?

12 **A Yes.**

13 Q So the fact that you chose a Walther is an

14 affirmation in your mind that Walther is a quality brand;

15 right?

16 **A In my mind, yes.**

17 Q I'm going to hand you --

18 **A Sixteen.**

19 Q -- what I'm going to mark as Deposition

20 Exhibit 16.

21 (Deposition Exhibit No. 16 marked for

22 identification.)

23 Q (By Mr. Wells) Looking at Deposition

24 Exhibit 16, do you see the URL there at the top?

25 **A I do.**

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1 Q Do you see that the URL says
 2 Waltherarms.com/PDP?
 3 **A I do.**
 4 Q And I can represent to you that this is screen
 5 shots from the Walther Arms page specifically about the
 6 PDP?
 7 **A Yes.**
 8 Q And are you familiar with the PDP by Walther?
 9 **A I am.**
 10 Q What is it?
 11 **A It is a modern semi-automatic handgun, polymer
 12 based, striker fired with detachable magazines.**
 13 Q Do you see on the front of Exhibit 16 Walther
 14 PDP was apparently awarded the guns and ammo 2021 handgun
 15 of the year?
 16 **A Yes.**
 17 Q Do you think that was a well-deserved award?
 18 **A I -- Based on Walther's history and quality, I
 19 would, yes.**
 20 Q All right. Let me direct your attention to
 21 the back of that page. So it's a double-sided copy.
 22 **A Yeah.**
 23 Q Do you see that there are three handguns
 24 depicted here --
 25 **A I do.**

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1 Q -- on page two of this exhibit? The handgun
 2 depicted on the left, it's called a PDP compact. Do you
 3 see that?
 4 **A I do.**
 5 Q And under magazine capacity, what -- what's --
 6 what's listed?
 7 **A It lists 15 rounds.**
 8 Q What does that mean?
 9 **A That means that the magazine that's included
 10 with that firearm, that particular item number, is a
 11 15-round.**
 12 Q And looking down further, do you see at the
 13 bottom it says 10-round item number? The same column.
 14 **A I do.**
 15 Q What do you understand 10-round item number to
 16 mean?
 17 **A That to be 10-round magazine capacity variant.**
 18 Q So looking at the Walther website, is it fair
 19 to say that a person interested in purchasing a PDP compact
 20 could purchase either a PDP compact with a factory magazine
 21 of 15 rounds or a factory magazine of 10 rounds?
 22 **A Yes.**
 23 Q And directing your attention to the next
 24 firearm in the middle, PDP full size. Do you see that?
 25 **A I do.**

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1 Q What is the magazine capacity for the PDP full
 2 size?
 3 **A Eighteen rounds.**
 4 Q And the magazine there for the PDP of -- PDP
 5 full size of 18 rounds, that's above the 15-round threshold
 6 for PICA; right?
 7 **A It is.**
 8 Q So that magazine is not one that you could
 9 sell consistent with PICA?
 10 **A Correct.**
 11 Q But if a customer at Piasa Armory wanted a PDP
 12 full size, you could direct them to the 10-round item;
 13 right?
 14 **A We could.**
 15 Q And the 10-round magazine would comply with
 16 PICA?
 17 **A It would.**
 18 Q Just looking at the last page of this exhibit.
 19 Walther sells 10-round magazines for the PDP; right?
 20 **A For the full size and the compact, yes.**
 21 Q All right.
 22 (Deposition Exhibit No. 17 marked for
 23 identification.)
 24 Q (By Mr. Wells) This is No. 17. We talked
 25 about the Shooter's Bible earlier. Do you recall that?

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1 **A I do.**
 2 Q So I am marking as Deposition Exhibit 17 --
 3 MR. MAAG: Oh, I see how it is.
 4 Q (By Mr. Wells) I'm marking as Deposition
 5 Exhibit 17 an excerpt of the Shooter's Bible 114th Edition.
 6 I have a complete copy of it, but I'm -- I've just given
 7 you excerpts, which are copied pages from this complete
 8 version.
 9 **A Yes.**
 10 Q And you mentioned earlier that you keep copies
 11 of the Shooter's Bible for reference at Piasa Armory; is
 12 that right?
 13 **A Typically, yes.**
 14 Q So this 114th Edition, according to the
 15 copyright, is from 2022. And I'm going to direct your
 16 attention to page 153, directing your attention to the
 17 bottom of the page, Heckler & Koch.
 18 Do you see three rifles laid out there that
 19 are Heckler & Koch rifles?
 20 **A I do.**
 21 Q Are you familiar with the Heckler & Koch
 22 MR762A1?
 23 **A I am.**
 24 Q And the Heckler & Koch MR762A1 is a rifle;
 25 correct?

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1 **A It is.**
 2 Q And a rifle is a long gun?
 3 **A It's typically referred to as, yes.**
 4 Q And do you see on page 153 here, under
 5 magazine, it says, detachable box, 10 rounds, 20 rounds, do
 6 you see that?
 7 **A Yes.**
 8 Q So I want you to imagine you had a customer
 9 who owned a version of this rifle, so the Heckler & Koch
 10 MR762A1, that they purchased before January 10th of 2023,
 11 so before PICA took effect.
 12 **A Okay.**
 13 Q And this customer needs a replacement magazine
 14 for that rifle, for the MR762A1. Between the 10-round
 15 magazine and the 20-round magazine, which of those
 16 magazines can you sell to that customer?
 17 **A We would be required to only sell the 10-round**
 18 **magazine.**
 19 Q All right. I'm going to direct your attention
 20 to -- and -- I'm sorry. Before I leave that page,
 21 page 153, do you see on the -- the right-hand side how it
 22 has rifles there?
 23 **A I do.**
 24 Q And is it fair to say that the Shooter's Bible
 25 groups firearms into categories like rifle, handgun and

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1 shotgun?
 2 **A Yes.**
 3 Q And that's because those are -- rifle, handgun
 4 and shotgun are pretty common types of firearms?
 5 **A Those are industry terms for the -- the**
 6 **variety of things that are offered from various**
 7 **manufacturers, yes.**
 8 Q I'm going to direct your attention to page 363
 9 of this exhibit. I'm directing your attention to the upper
 10 left-hand corner of the SP5. Do you see that?
 11 **A I do.**
 12 Q Do you see for the SP5, next to capacity, it
 13 says 10, 15, 30 rounds? Do you see that?
 14 **A I do.**
 15 Q Do you agree that the Heckler & Koch SP5 is a
 16 handgun?
 17 **A This variant of the SP5 is, yes.**
 18 Q So I want you to imagine, again, a customer
 19 who owns a Heckler & Koch SP5 that they acquired prior to
 20 January 10, 2023, when PICA took effect. They need to
 21 replace the magazine for the Heckler & Koch SP5. Which
 22 capacity magazine can you legally see to that customer?
 23 **A They would typically purchase that with a**
 24 **30-round magazine. We would be limited to selling them the**
 25 **10 or 15-round magazine.**

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1 Q When you're buying a magazine for a specific
 2 handgun, it is possible to know how many rounds of
 3 ammunition of a particular caliber that magazine will hold?
 4 **A It's possible to know how -- how many it was**
 5 **designed to hold, but designed does not always line up with**
 6 **how many it will actually hold. Magazines that begin to**
 7 **wear or were not designed properly can sometimes hold more**
 8 **or sometimes hold less, or errors in manufacturing can make**
 9 **them hold more or less.**
 10 Q But generally speaking, what the manufacturer
 11 represents about the capacity of the magazine is what the
 12 magazine capacity is?
 13 **A Magazines from reputable manufacturers, yes.**
 14 Q And when you're buying a magazine for a
 15 specific handgun, it is possible to buy a magazine of 15
 16 rounds or less as long as the handgun manufacturer offers
 17 such a magazine for that handgun; correct?
 18 **A If the customer would like to purchase a**
 19 **factory brand magazine, yes. But again, not every company**
 20 **produces factory magazines of 15 or -- of 15 rounds for**
 21 **guns that are not designed for 15-round magazines.**
 22 Q And when you're buying a magazine for a
 23 specific rifle, it is possible to know how many rounds of
 24 ammunition of a particular caliber that magazine will hold?
 25 **A Based on what the manufacturer of the magazine**

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1 **says. But again, other magazines can hold other calibers.**
 2 Q So there may be some variation, but generally
 3 speaking, what the manufacturer represents about the
 4 magazine capacity for a particular rifle is going to be the
 5 magazine capacity?
 6 **A It depends on the rifle and the manufacturer.**
 7 Q If it's a reputable manufacturer?
 8 **A It can be, but magazines like AR-15 magazines**
 9 **can be produced by reputable manufacturers but hold 30 of**
 10 **one round and five or 10 of another round.**
 11 Q And in the examples you just gave of a
 12 magazine that can hold 30 of one round and five or 10 of
 13 another round, the five or 10 of another round would be a
 14 much larger caliber; right?
 15 **A Typically.**
 16 Q So when someone buys an AR-15, let's say it
 17 has a 15-round -- or let's say it has a 10-round magazine.
 18 All right? So an AR-15, 10-round magazine, it may be a
 19 10-round magazine for 5.56 NATO; is that right?
 20 **A Correct.**
 21 Q But that same magazine for a larger caliber
 22 may hold fewer than 10 rounds; correct?
 23 **A Correct.**
 24 Q If -- If that same magazine is designed for an
 25 AR-15 that's chambered in 5.56 NATO, and the magazine

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1 capacity is 10 rounds, can the magazine accept more than 10
 2 rounds of a different caliber of ammunition?
 3 **A It depends on the overall size of the**
 4 **magazine. For example, Magpul is the industry -- industry**
 5 **standard for AR-15 magazines has a magazine that is**
 6 **designed for 10 rounds only, but shares the same form**
 7 **factor as the 30-round magazine.**
 8 Q When you say form factor, what do you mean?
 9 **A The outside appearance.**
 10 Q And what is different about the inside of that
 11 magazine?
 12 **A The inside has either a block or is built with**
 13 **denial spaces to prevent that large capacity.**
 14 Q Why -- Do you have an understanding as to why
 15 Magpul did that?
 16 **A They sold a lot to customers in California and**
 17 **other states with 10-round magazine capacity limits who**
 18 **wanted to use other equipment standard to the AR-15**
 19 **industry, things like magazine pouches and magazine**
 20 **couplers, but still retain that form factor of a 30-round**
 21 **magazine.**
 22 Q So it's your understanding that Magpul
 23 recognized that there was a 10-round magazine limit
 24 applicable in California, and they designed the inside of
 25 the magazine that could be used for a 30-round AR-15 such

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1 that that magazine could only accept 10 rounds; is that
 2 right?
 3 **A Correct. They also sell limiting items. So**
 4 **something you could take the magazine apart, insert into**
 5 **the magazine to prevent additional rounds from going into**
 6 **it.**
 7 Q And if someone needed to replace AR-15
 8 magazines in Illinois, could the manufacturer do the same
 9 thing in Illinois for a 10-round limit?
 10 **A Potentially, but that would be up to the**
 11 **manufacturer and business decisions.**
 12 Q And if a manufacturer did offer such a
 13 magazine, you would be able to sell it under PICA; right?
 14 **A We would.**
 15 MR. WELLS: Can we take a quick break real
 16 quick?
 17 THE VIDEOGRAPHER: This is the videographer.
 18 We're going off the record. The time now is 4:56.
 19 (Whereupon, a short break was taken.)
 20 THE VIDEOGRAPHER: This is the videographer.
 21 We're back on the record. The time now is 5:03.
 22 Q (By Mr. Wells) Mr. Pulaski, we previously
 23 looked at the two sworn written statements that you
 24 prepared in this case as Deposition Exhibits 1 and 2. Do
 25 you remember that?

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1 **A Yes.**
 2 Q In preparing those declarations, did you get
 3 any information from Mr. Maag that you included in those
 4 declarations?
 5 **A Yes.**
 6 Q What information specifically?
 7 **A I didn't keep a list of specific information,**
 8 **but this was a discussion back and forth through the**
 9 **entire -- through the entirety of both of these**
 10 **declarations.**
 11 Q And is information from an attorney in a
 12 lawsuit the type of information that firearms experts
 13 typically rely on?
 14 **A That depends on the attorney. This particular**
 15 **attorney happens to also be a firearms expert with much**
 16 **deeper encyclopedic-level knowledge than I have. He's**
 17 **guided me toward a lot -- a lot more places to broaden my**
 18 **knowledge.**
 19 Q We talked earlier about AR-type rifles. Does
 20 AR -- if -- If you use the term "AR-type," would that
 21 sometimes fairly include both the AR-15 and the AR-10?
 22 **A In a layman's term, yes, but -- So somebody**
 23 **with lack of knowledge of the industry, lack of firearms**
 24 **knowledge. Just in the same way that anyone says car, they**
 25 **look at any car and say that's a car. But somebody that**

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1 **has more knowledge says, yes, that's a Toyota or a Honda.**
 2 **Similar ways -- analogous to differences between the AR-10**
 3 **and the AR-15.**
 4 MR. WELLS: So subject to my reservation
 5 rights earlier on about the scope of this deposition, my
 6 motion for summary judgment, and reserving the right to
 7 potentially seek a second deposition, to the extent
 8 necessary, related to the other claims that aren't covered
 9 by the summary judgment motion, I don't have any further
 10 questions for you at this time.
 11 **THE WITNESS: Okay.**
 12 MR. MAAG: Like the last time, it would be
 13 quicker if we changed sides.
 14 MR. WELLS: Sure.
 15 MR. MAAG: We can go off while we're changing
 16 sides.
 17 THE VIDEOGRAPHER: This is the videographer.
 18 We're going off the record. The time now is 5:05.
 19 (Whereupon, a short break was taken.)
 20 THE VIDEOGRAPHER: This is the videographer.
 21 We're back on the record. The time now is 5:07.
 22 **EXAMINATION**
 23 **QUESTIONS BY MR. MAAG:**
 24 Q I'm handing you a magazine. Are there any
 25 markings on that?

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1 MR. WELLS: Tom, I'm just going to note,
 2 again, my objection that I had before which is --
 3 MR. MAAG: Same objection that you put on the
 4 record before, you can have a standing objection.
 5 MR. WELLS: Right, but it's another -- it's
 6 another witness, so I just want to be clear. These are
 7 items that prior to today I personally had not seen. They
 8 were not produced to us. I under -- understand your
 9 position on that, but I just want to note my objection to
 10 the use of these particular items in this deposition as
 11 well.
 12 MR. MAAG: All right. And for the record, I
 13 didn't see all of your documents prior to today either, but
 14 you're -- you're on the record.
 15 MR. WELLS: Right. And you didn't serve any
 16 written discovery requests on us; right?
 17 Q (By Mr. Maag) All right. You ready?
 18 A Go ahead.
 19 Q Generally, what is that that I've handed you?
 20 A That's a magazine that is made in Brazil, and
 21 it says 15 on the back of it.
 22 Q All right. Is there any serial number or
 23 model marking on that?
 24 A There is not.
 25 Q Do you recognize that, what that fits?

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1 A It would fit, based on a notch in the back of
 2 it, an older Beretta style pistol or rifle that takes older
 3 style Beretta magazines.
 4 Q Okay. Is that a rifle magazine? Pistol
 5 magazine? Or are you able to discern the difference?
 6 A Because it can fit both, I can't discern
 7 whether it's one or the other.
 8 Q Okay. I'm handing you another magazine. Are
 9 there any markings on that?
 10 A I see none.
 11 Q Do you recognize that magazine?
 12 A This looks like a magazine from a Mini-14
 13 or -- I'm sorry, a M-14 or similar variant.
 14 Q I'm handing you a third magazine. Do you
 15 recognize that magazine?
 16 A That one is definitely a magazine of M-14 or
 17 similar, M1A.
 18 Q All right. The first -- Or the second
 19 magazine that you previously thought might have been an
 20 M-14 variant, do you still think that's an M-14 variant?
 21 A No.
 22 Q All right. Let's go back to the second
 23 magazine. Are you able to discern what that magazine is
 24 actually for now?
 25 A No.

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1 Q All right. Are you able to discern whether
 2 that's a rifle, pistol or shotgun magazine?
 3 A I can presume that it is not a shotgun
 4 magazine. However, there are shotgun rounds that could fit
 5 in this magazine.
 6 Q Are you able to discern whether that's a rifle
 7 or pistol magazine?
 8 A No.
 9 Q Set that aside and go to what you have
 10 identified as an M-14 magazine. You -- Are there any
 11 markings on that?
 12 A No.
 13 Q You simply recognize that magazine?
 14 A I do.
 15 Q All right. Is there any functional difference
 16 for that -- for a rifle versus a pistol?
 17 A No. They're all a box with a spring inside.
 18 Q Okay. I'll hand you another magazine. Do you
 19 recognize that magazine?
 20 A It looks like something that was designed to
 21 fit an AR-10 or similar model.
 22 Q All right. Are there any markings on it?
 23 A There are not.
 24 Q All right. If I were to represent to you that
 25 that is a French Model 1949 magazine, would that help you

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1 in any way, shape or form?
 2 A Yes.
 3 Q All right. Are you able to discern from your
 4 observations whether that's a rifle or pistol magazine?
 5 A If I were to know that this was a French M-49
 6 magazine, I would know that it was for the M-49. However,
 7 those can be converted into pistols as well.
 8 Q I'm handing you a magazine. Do you recognize
 9 that magazine?
 10 A I do.
 11 Q What is that?
 12 A This is for an M-1 carbine.
 13 Q All right. And do you know about how many
 14 rounds -- assuming that's a standard magazine for an M-1
 15 carbine of that size, how many rounds that should hold?
 16 A It appears it should be 15.
 17 Q All right. And the M-1 carbine, is that a
 18 rifle, pistol or shotgun?
 19 A It is either a rifle or a pistol.
 20 Traditionally, for the military, it was a rifle. However,
 21 they were modified to become pistols and are currently
 22 produced as pistols also.
 23 Q And who currently produces them as pistols?
 24 A Inland Manufacturing.
 25 Q All right. Did anyone else previously

Page 129

1 manufacture them as pistols?

2 **A I'm sure that they have.**

3 Q Okay. So that magazine could fit either a

4 rifle or a pistol?

5 **A Yes.**

6 Q All right. Could you legally sell that in

7 Illinois?

8 **A If it were for a pistol, yes. If it were for**

9 **a rifle, no.**

10 Q If a customer came in and said I have an M-1

11 carbine, can you order me a 15-round magazine for it, do

12 you have enough information to determine whether or not you

13 could legally sell that magazine?

14 **A No.**

15 Q If they told you that it was for a pistol,

16 could you legally order and sell that magazine?

17 **A If it was for a 15 -- if it was 15 rounds for**

18 **a pistol, yes.**

19 Q What if that person owned both an M-1 carbine

20 pistol and an M-1 rifle?

21 **A I would have no way of discerning that from**

22 **interaction at the counter.**

23 Q All right.

24 **A But it would presume that they would not be**

25 **allowed to use that in their rifle if they bought a**

Page 130

1 **15-round magazine.**

2 Q All right.

3 **A Thank you.**

4 Q Are there any markings on that magazine?

5 **A It says "checkmate" on the bottom.**

6 Q All right. Do you recognize that magazine?

7 **A I recognize it, and it says 45 ACP on the**

8 **side. I recognize the basic design.**

9 Q What is the basic design?

10 **A That is for pistols that are of the 1911 style**

11 **or a variety of conversions that were rifle variants.**

12 Q All right. What is the 1911 style?

13 **A 1911 is the U.S. military pistol adopted in**

14 **1911. It was standard until the late '70s, early '80s.**

15 Q Okay. Are there rifles that use that

16 magazine?

17 **A Yes.**

18 Q Are there pistols that use that magazine?

19 **A Yes.**

20 Q I'm handing you -- Well, what am I handing

21 you?

22 **A This is a frame for a 1911.**

23 Q Is that magazine compatible with that?

24 **A It is.**

25 Q Can you insert it?

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1 **A I can.**

2 Q Does it fit?

3 **A It does. It doesn't lock because there's --**

4 **the parts aren't there.**

5 Q Right. It's nonfunctional because it's

6 disassembled and missing most of the parts; correct?

7 **A Right.**

8 Q All right. Is there -- Assuming that that

9 pistol was complete, does that appear that that magazine

10 would function in that frame?

11 **A Yes.**

12 Q All right. And that frame is normally in a

13 pistol configuration?

14 **A We've seen and sold them in both**

15 **configurations, pistol and rifle.**

16 Q All right. What am I handing you now?

17 **A This is a pistol stock.**

18 Q And if you could attach that. Assuming that

19 that was complete with a barrel, that same frame would now

20 be what?

21 **A It would be considered a short-barreled rifle.**

22 Q It'd be a rifle?

23 **A Yes.**

24 Q All right. With the same magazine?

25 **A With the same magazine.**

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1 Q So mechanically, there is no difference

2 between that magazine as a rifle magazine and that magazine

3 as a pistol magazine; correct?

4 **A Correct.**

5 Q All right. I'm handing you another magazine.

6 Are there any markings on that?

7 **A There are some numbers on the back of it.**

8 Q What are the numbers?

9 **A It's A15981.**

10 Q All right. Do you recognize that magazine?

11 **A It appears to be a 308 or 76239 variant of a**

12 **AK potentially. No, I take that back. No, I do not**

13 **recognize this magazine. It's missing a part of the front.**

14 Q All right. Well, it's actually complete,

15 but --

16 **A Sorry. Complete for -- for the magazine, but**

17 **not complete for what I thought it was.**

18 Q All right. Are you able to discern whether

19 that is a rifle or a pistol or a shotgun magazine?

20 **A No.**

21 Q All right. Let's see. Handing you another

22 magazine. Are there any markings on that?

23 **A There is Walther markings on it.**

24 Q What does it say specifically, if you can read

25 it?

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1 **A It says Walther P-1 9-millimeter.**
 2 Q Okay. Is that a rifle or a pistol magazine?
 3 **A Unknown, but --**
 4 Q Were there both rifle and pistol variants of
 5 the Walther P-1?
 6 **A Yes.**
 7 Q In fact, did Ronald Reagan have a Walther P-1
 8 carbine?
 9 MR. WELLS: Objection. Lack of personal
 10 knowledge.
 11 MR. MAAG: It's on display at his presidential
 12 museum.
 13 MR. WELLS: That's my objection.
 14 Q (By Mr. Maag) You can answer.
 15 **A I have no personal knowledge of it.**
 16 Q All right. Then that's fine. What's that
 17 magazine?
 18 **A That looks like an older European magazine.**
 19 Q Are there any markings on it?
 20 **A There are none.**
 21 Q Maybe on the base?
 22 **A It looks like a couple numbers. 66-4 or 4-99.**
 23 Q Are you able to discern whether that's a rifle
 24 or a pistol magazine?
 25 **A No.**

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1 Q All right. Handing you another magazine. Are
 2 there any markings on that?
 3 **A There are.**
 4 Q What are the markings?
 5 **A It says M-88, M-100, 308 cal, 243 cal.**
 6 Q Are there any other markings on it?
 7 **A It says Colyer clip on the side.**
 8 Q All right. Are you able to discern whether
 9 that's a rifle, pistol or shotgun magazine?
 10 **A No.**
 11 Q And I'll hand you another magazine. Are there
 12 any markings on that?
 13 **A This one is marked FN Manufactured, Inc,**
 14 **Columbia, South Carolina, and a manufacturer code.**
 15 Q All right. Are you able to discern whether
 16 that's a rifle, pistol or shotgun magazine?
 17 **A No.**
 18 Q Is it possible that that magazine will fit
 19 both rifles, pistols or shotguns?
 20 **A Yes.**
 21 Q What type of magazine did I hand you there?
 22 **A This is a Glock magazine.**
 23 Q All right. And is it similar to this other
 24 magazine that I gave you?
 25 **A Yes. This other one is a Magpul brand, Glock**

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1 **compatible magazine.**
 2 Q All right. And I'm handing you a frame. What
 3 is that frame of, generally?
 4 **A This is a Glock.**
 5 Q All right. Do those magazines generally fit
 6 in that pistol frame?
 7 **A Of this design, yes.**
 8 Q All right. And that would be a pistol frame
 9 then?
 10 **A Typically, but can also be a rifle.**
 11 Q All right. I'm handing you a shoulder stock.
 12 Does that attach to that pistol frame?
 13 **A Yes, it does.**
 14 Q Go ahead and attach it. Would then that make
 15 that a rifle?
 16 **A If it were complete, yes.**
 17 Q With the same magazine?
 18 **A Correct.**
 19 Q Is it fair to say there's no discernible
 20 difference -- no discernible difference that you can
 21 articulate or you can identify between a rifle magazine and
 22 a pistol magazine?
 23 MR. WELLS: Objection to form.
 24 Q (By Mr. Maag) You can answer.
 25 **A Between these magazines, no.**

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1 Q The magazines that I have handed to you for
 2 examination, other than one -- other than the Glock and
 3 Magpul branded magazine for Glocks, are they the -- do they
 4 appear to be for the same firearms?
 5 **A Yes. These two particular magazines.**
 6 Q Okay. The Glock and the Magpul are?
 7 **A Yes.**
 8 Q The other magazines, any of them, are they the
 9 same as any of the other magazines that I have handed you?
 10 **A They don't appear to be.**
 11 Q All right. So it's a wide variety of
 12 magazines?
 13 **A Yes.**
 14 Q Okay. Do you recognize that?
 15 **A This appears to be the bolt and carrier from a**
 16 **Saiga shotgun or similar variant or copy.**
 17 Q All right. Is that an AK-47 type?
 18 **A It's a copy of the AK-47 of a 12-gauge variant**
 19 **of the AK-47.**
 20 Q All right. And can you describe that for the
 21 record? What does it look like?
 22 **A It is a rotating bolt inside of a large**
 23 **metallic housing with a handle on the side and a piston on**
 24 **the front.**
 25 Q All right. Is that what an AK-47 rifle or

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1 pistol bolt and gas piston would look like other than the
 2 sizes?
 3 MR. WELLS: Objection to form.
 4 Q (By Mr. Maag) You can answer.
 5 **A It's made -- It's modified to accept the**
 6 **proper ammunition.**
 7 Q I understand there's dimensional differences,
 8 but I mean, the general description.
 9 **A Yes.**
 10 Q All right. Is that the same -- Are you
 11 familiar with the gas and bolt system of the M1 Garand?
 12 **A Yes.**
 13 Q Is that the same general gas and bolt system
 14 of the M1 Garand?
 15 **A Yes. The Garand uses a rotating bolt and a**
 16 **long piston.**
 17 Q Is it fair to say that other than dimensional
 18 differences, there is no difference between the gas and
 19 bolt system of a Garand and an AK-47 type firearm?
 20 MR. WELLS: Objection to form.
 21 Q (By Ms. Helfrich) You can answer.
 22 **A Very similar.**
 23 Q You were asked to read part of PICA. Do you
 24 remember that?
 25 **A I do.**

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1 Q I believe it's Exhibit 9 that was given to
 2 you?
 3 **A Yes.**
 4 Q And there was a features definition that I
 5 think you were asked to read at one point; correct?
 6 **A Yes.**
 7 Q Did that include a semi-automatic firearm that
 8 could accept a detachable magazine and had a pistol grip?
 9 **A Yes.**
 10 Q Are you familiar with that -- what I have
 11 handed you?
 12 **A I am.**
 13 Q What is that, generally?
 14 **A In general, it's an M1 carbine rifle stock.**
 15 Q Does it appear to be a standard M1 carbine
 16 rifle stock?
 17 **A It does.**
 18 Q The grip on that, what would you call that
 19 type of grip?
 20 **A The industry refers to it as a pistol grip.**
 21 Q Is that the same type of grip as on an AK-47
 22 or an AR-15?
 23 **A It's a similar shape and style.**
 24 Q But it doesn't protrude below, does it?
 25 **A Below the bottom of the stock, no.**

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1 Q Okay. And the -- Does part of that stock on
 2 the front of it, if it was fully assembled, would that
 3 cover the barrel?
 4 **A It would.**
 5 Q And would that allow the non-firing hand to
 6 prevent the firer from burning themselves while holding the
 7 firearm with the non-firing hand?
 8 **A It would.**
 9 Q And is the M1 carbine a semi-automatic
 10 firearm?
 11 **A Yes.**
 12 Q Does it accept a detachable magazine?
 13 **A It does.**
 14 Q Therefore, is it fair to say in its original
 15 configuration, the M1 carbine is prohibited under PICA?
 16 MR. WELLS: Objection. Calls for a legal
 17 conclusion.
 18 Q (By Mr. Maag) You can answer.
 19 **A Based on my experience and reading PICA, it**
 20 **does.**
 21 Q Is the M1 carbine in any way, shape or form an
 22 AR-type or AK-type firearm?
 23 **A It is not.**
 24 Q If AK-47s or AR-15 type firearms were
 25 converted to bolt action or pump action, under PICA could

Page 140

1 they be sold in Illinois?
 2 MR. WELLS: Objection. Calls for a legal
 3 conclusion.
 4 Q (By Mr. Maag) You can answer.
 5 **A Because of the definitions of PICA and machine**
 6 **gun parts -- Or pardon me. Definition of PICA and assault**
 7 **weapon parts, that lower receiver on an AR-15 is considered**
 8 **an assault weapon or an assault weapon part.**
 9 Q Who says?
 10 **A PICA.**
 11 Q And has the state police posted commentary to
 12 that effect on their website?
 13 **A I believe in the questions and answers page**
 14 **they got that.**
 15 Q So it is fair to say that a bolt-action rifle,
 16 based on the commentary of the state police on their
 17 website, that look too much like an AR-15 would be
 18 prohibited under PICA?
 19 **A Yes.**
 20 Q The same question --
 21 MR. WELLS: Where is that coming from?
 22 MR. MAAG: Off your client's website.
 23 MR. WELLS: And do you have a copy of what
 24 you're talking about?
 25 MR. MAAG: It's on your client's website.

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1 MR. WELLS: Have you produced a copy of --

2 MR. MAAG: Of your client's website? No, it's

3 on your website.

4 Q (By Mr. Maag) Same question for the AK-47.

5 **A It would be the same answer as an AR-15.**

6 MR. MAAG: I didn't write your client's

7 website.

8 MR. WELLS: It's kind of hard to know what

9 you're talking about when I don't have something to look

10 at, Tom. That's my objection.

11 MR. MAAG: Okay. Well, maybe your client will

12 take it down after you talk to them.

13 Q (By Ms. Helfrich) You have Exhibit No. 17 in

14 front of you?

15 **A I do.**

16 Q That's the Shooter's Bible cover page?

17 **A Yes.**

18 Q Are those firearms legal to sell in the State

19 of Illinois?

20 **A Not all of them.**

21 Q Why not?

22 **A The pistol pictured at the bottom has a**

23 **threaded barrel and was banned by PICA.**

24 Q Are you familiar with the Beretta AR-100?

25 **A Yes.**

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1 Q Is that an AR-type firearm?

2 **A Let me find the page, please.**

3 Q Not asking if it's listed.

4 **A I'm sorry. No, it's not. It just shares a**

5 **basic shape.**

6 Q Are you familiar with the Mauser c96 broom

7 handle with fixed 20-round magazine?

8 **A I am.**

9 Q What vintage is that?

10 **A Pre 1900s.**

11 Q That's literally designed and made in the

12 1800s?

13 **A Yes.**

14 Q And is that listed on Exhibit No. 10, page 12,

15 as being illegal in Illinois under PICA?

16 **A Yes.**

17 Q You were asked about the Norinco 86S. Are you

18 familiar with that particular firearm?

19 **A Not having handled it a lot, but with the**

20 **basic idea of it, yes.**

21 Q And Exhibit No. 10, page 23, there's a

22 photograph of it?

23 **A Yes.**

24 Q And is that what you recognize as a Norinco

25 86S?

Page 143

1 **A Yes.**

2 Q Does that look like an AK-type firearm?

3 **A It does not based on the overall shape of it,**

4 **no.**

5 Q If someone were to show that to you -- Strike

6 that.

7 If someone were to say you can't have an

8 AK-type firearm in Illinois, and you were asked about the

9 Norinco 86S, visually would you think that that is an

10 AK-type firearm?

11 **A Only if I had intimate knowledge of the**

12 **AK-style firearms.**

13 Q And on page 24 of Document 10, at the bottom

14 there's reference to SKS with detachable magazine. Are

15 there any parts commonalities that you're aware of between

16 the SKS, either with or without a detachable magazine, and

17 anything that is arguably an AK variant or copy?

18 **A The only part that would be potentially**

19 **interchangeable would be a sling in a magazine, depending**

20 **on the detachable magazine conversion kit used.**

21 Q If someone were to tell you that you could not

22 sell or possess an AK-type firearm in the State of Illinois

23 and then you were shown an SKS, would that trigger you in

24 your mind that you could not have that SKS?

25 **A That would -- Well, no. The short answer, no.**

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1 Q On page 28 of Exhibit 10.

2 MR. WELLS: Sorry. I'm just trying to help.

3 MR. MAAG: That's okay. I'll wait for you.

4 MR. WELLS: Actually, you know, what, they are

5 right here. I'm sorry. Here we go.

6 Q (By Mr. Maag) Page 28. You were asked about

7 the ArmaLite M15 .22 LR carbine?

8 **A Yes.**

9 Q Does that even have a gas system?

10 **A No.**

11 Q The gas system on a standard AR-15 is designed

12 by Gene Stoner when he was at ArmaLite back in the '50s,

13 does that have a gas system?

14 **A The ArmaLite AR-15, yes.**

15 Q All right. We talked about the Beretta AR-70,

16 the Bushmaster ACR. Is that in any way, shape or form an

17 AR variant?

18 **A No.**

19 Q Why not?

20 **A It was designed from the ground up apart from**

21 **an AR-15.**

22 Q All right. Is the gas system the same?

23 **A No. It uses a piston instead of direct gas.**

24 Q Is the stock the same?

25 **A No.**

Page 145

1 Q The AR-15, does it have a detachable pistol
2 grip?

3 **A The AR-15 does.**

4 Q Does the Bushmaster ACR have a detachable
5 pistol grip?

6 **A It does not.**

7 Q Page 30, the Chiappa Firearm M4 rifles. Kind
8 of looks like a US M4 carbine?

9 **A Yes.**

10 Q Does it have a gas system?

11 **A It doesn't appear to.**

12 Q Is it in any way, shape or form an AR-type
13 firearm as you understand it?

14 **A Since they are type of a firearm with gas
15 systems, no.**

16 Q Page 32, the Heckler & Koch MR 556. Does that
17 have any direct gas impingement system like an AR-15?

18 **A It uses a piston.**

19 Q We talked about that already. We talked about
20 that. The Ruger AR 556, does that have a gas impingement
21 or gas piston?

22 **A AR 556 has a impingement gas.**

23 Q Does Ruger make a gas piston version?

24 **A I do. It's called the SR 556.**

25 Q All right. So the Ruger SR 556 would be

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1 different than an AR-15 as designed by Gene Stoner because
2 it has a gas system and not a gas impingement system?

3 **A Yes.**

4 MR. WELLS: What page are you on, Tom?

5 MR. MAAG: I'm not even looking at anything.
6 I'm just --

7 MR. WELLS: Riffing.

8 Q (By Mr. Maag) I'm trying to skip over stuff
9 you have already talked about because I don't want to be
10 here any more than you do. The Beretta cX 4 on page 43.

11 **A Yes.**

12 Q Does that take the same magazine as the
13 Beretta .92 pistol?

14 **A Yes.**

15 Q Is that a rifle?

16 **A It is.**

17 Q You were asked about -- Let me follow it here.
18 In page -- In Document 17, page 363, about the Heckler &
19 Koch SP5 pistol.

20 **A Yes.**

21 Q In Document No. 10, page 47, it makes
22 reference to the H&K 94?

23 **A Yes.**

24 Q Are you familiar with those firearms?

25 **A I am.**

Page 147

1 Q Is the H&K 94 a rifle version of the SP5?

2 **A It is.**

3 Q Do they use the same magazine?

4 **A They do.**

5 Q Is it legal if you own both a rifle and a
6 pistol version of those firearms to purchase or possess a
7 15-round magazine?

8 **A You would have to have the pistol variant,
9 You would have to own the pistol variant to be legal.**

10 Q All right. And then could you, as a dealer,
11 sell the 15-round magazine to somebody that said I want a
12 magazine for my H&K 94?

13 **A No.**

14 Q Now, the ban prohibits possession of and
15 transfer of the magazine; correct?

16 **A Yes.**

17 Q It doesn't prohibit inserting a magazine into
18 a given firearm, does it?

19 **A Presumably, no.**

20 Q So how would the owner of an H&K 94 and an SP5
21 know that they were legal buying a 15-round magazine?

22 **A They would not.**

23 Q On page 48 of Document 10, it's got the
24 Kel-Tec SUB2000. Do versions of that accept Glock
25 magazines?

Page 148

1 **A Yes.**

2 Q Do versions of that accept CZ 75 magazines?

3 **A Yes, they do.**

4 Q Is there a wide variety of otherwise, quote
5 unquote, pistol magazines that the Kel-Tec SUB2000 will
6 accept?

7 MR. WELLS: Object to form. Vague.

8 Q (By Mr. Maag) You can answer.

9 **A The SUB2000 accepts at least six different
10 magazines.**

11 Q Do you know which six offhand?

12 **A Glock, Smith & Wesson, CZ, Kenik, Beretta, and
13 Springfield Armory and others, I believe.**

14 Q All right. Are you familiar with the
15 Smith & Wesson military and police pistol?

16 **A Yes.**

17 Q Are you aware of the carbine that
18 Smith & Wesson came out with relatively recently, I guess
19 this year, that accepts military and police magazines?

20 **A Yes, they are folding carbine.**

21 Q Very good. That's an article in the American
22 Rifleman on it sometime this year. Are there rifle and
23 pistol versions of the Uzi?

24 **A Yes.**

25 Q Are the magazines the same?

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1 **A They are.**
 2 Q Are there rifle and pistol versions of the
 3 Ruger 10/22?
 4 **A There are.**
 5 Q Are the magazines the same?
 6 **A They are.**
 7 Q If someone were to just randomly hand you a
 8 13-round magazine in a given caliber, pick the caliber, it
 9 really doesn't matter, and asked you whether or not that
 10 magazine was legal in the State of Illinois, without
 11 knowing more, could you answer that question under PICA?
 12 **A No.**
 13 Q Why not?
 14 **A Because pistol -- a pistol or rifle magazine**
 15 **could fit either potentially.**
 16 Q So it potentially could be legal if it was a
 17 pistol magazine?
 18 **A Yes.**
 19 Q Could potentially be illegal if it was a rifle
 20 magazine?
 21 **A Yes.**
 22 Q And there's no way discern the two?
 23 **A Not without having the individual firearms in**
 24 **front of you.**
 25 Q And even if you have the individual firearms,

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1 there could be rifle and pistol variants in both of those?
 2 **A Correct.**
 3 Q Are you familiar with the Sturm, Ruger &
 4 Company Mini-14 tactical rifle M-14-20CF?
 5 **A Yes.**
 6 Q Does Ruger make a version of the Mini-14
 7 that -- Well, okay. Can you describe the tactical rifle to
 8 me?
 9 **A The tactical version has different color**
 10 **furniture, different features on it that would be**
 11 **considered banned by PICA, such as adjustable stocks or**
 12 **sometimes pistol grips.**
 13 Q Does Ruger also make a plain version in a
 14 traditional wooden stock?
 15 **A They do.**
 16 Q Would that be classified as a copy duplicate
 17 variant or altered facsimile of a Ruger Mini-14 tactical
 18 rifle?
 19 **A It could be.**
 20 Q Thus, PICA could very well prohibit a standard
 21 Ruger Mini-14?
 22 **A Yes.**
 23 MR. WELLS: Object to form. Calls for a legal
 24 conclusion.
 25 Q (By Mr. Maag) Is there any way for a person to

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1 determine simply by looking at a standard Ruger Mini-14 or
 2 a standard US M1 carbine whether that gun is legal under
 3 PICA?
 4 MR. WELLS: Objection. Form. Calls for a
 5 legal conclusion.
 6 **A It would be very difficult.**
 7 Q (By Mr. Maag) All right. What have I handed
 8 you?
 9 **A These are lower and upper receivers for**
 10 **different versions, copies of the AR-15 or AR 10.**
 11 Q All right. The one closest to you on your
 12 left, what is the manufacturer and model of that?
 13 **A This is an Aero Precision M4 E1.**
 14 Q Anywhere on that does it say AR in any way,
 15 shape or form?
 16 **A No.**
 17 Q All right. Is that -- And feel free to look
 18 at the Exhibit 9, if you need to, to refresh your
 19 recollection. Is that fire -- Is that receiver listed on
 20 the PICA banned list?
 21 **A The M4 E1 is not listed.**
 22 Q Simply by looking at Exhibit No. 9, the PICA
 23 statute, is there any way for a person to discern whether
 24 that lower receiver is legal or illegal in Illinois?
 25 **A Because it is substantially similar, they**

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1 **could presume that it is a banned item.**
 2 Q But that would require them to know what an
 3 AR-15 lower looked like?
 4 **A Yes.**
 5 Q And if they didn't know what an AR-15 lower
 6 looked like, would they be able to discern that?
 7 **A Not without guidance potentially.**
 8 Q And that receiver, in fact, is different than
 9 a standard AR-15 lower, is it not?
 10 **A It is.**
 11 Q How is it different?
 12 **A Things like the magazine well are opened up**
 13 **larger. There's a trigger guard that is in place where a**
 14 **standard AR-15 receiver uses an inserted pin and piece.**
 15 **There's also additional holes drilled and pins used or**
 16 **screws used instead of pins in a few places.**
 17 Q Okay. So there are identifiable differences
 18 between that receiver and an AR-15 receiver?
 19 **A Yes.**
 20 Q All right. And set that one down. The one
 21 right above that, is that an AR-15 receiver?
 22 **A No.**
 23 Q Is that an AR-10 receiver?
 24 **A It is not.**
 25 Q Are you able to discern what that is?

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1 **A It is a copy of an AR-15 receiver that would**
 2 **accept only, it looks like, Glock magazines.**
 3 Q All right. And do you want to try it with a
 4 Glock magazine or are you fairly certain it accepts Glock
 5 magazines?
 6 **A I would presume on the shape and style of it**
 7 **that it would, but I can.**
 8 Q Okay. Simply by looking at that lower
 9 receiver, is there any way, shape or form for a person of
 10 ordinary intelligence to determine whether or not based on
 11 the statute in PICA whether that is a banned item?
 12 MR. WELLS: Objection to form. Calls for a
 13 legal conclusion.
 14 Q (By Mr. Maag) You can answer.
 15 **A This would be presuming that somebody had**
 16 **familiarity with PICA and with the differences between**
 17 **AR-15s and 9 millimeter copies of AR-15s.**
 18 Q So how would they determine that that would
 19 be -- would or would not be an AR-15 under PICA?
 20 **A I don't know that they could easily.**
 21 Q Can you think of any way you would do so,
 22 simply --
 23 **A No. I would say that it would be something**
 24 **that could be made into a rifle with banned features.**
 25 Q All right. Aside from the fact you could

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1 conceivably assemble it and do it right with banned
 2 features, could you assemble it to a rifle without banned
 3 features?
 4 **A Potentially, yes.**
 5 Q Okay. Either of the next lowers, it doesn't
 6 really matter which one. What is that one?
 7 **A This is a Palmetto G3 E10.**
 8 Q Is that -- Does that say on there AR, AR-15,
 9 AR-10, or anything like that?
 10 **A No.**
 11 Q Is that an AR-15?
 12 **A It is not.**
 13 Q Is that by name banned under PICA?
 14 **A I don't believe so. I would have to refer to**
 15 **the list.**
 16 Q All right. You don't recall seeing it on the
 17 list?
 18 **A I don't recall seeing the Palmetto G3 E10 on**
 19 **the list.**
 20 Q Could that be assembled, assuming that it was
 21 not banned by named item, into a legal firearm under PICA?
 22 **A It could be assembled into a bolt-action**
 23 **firearm or a single-shot-only firearm.**
 24 Q All right. If it didn't have pistol grips, a
 25 flash suppressor, sliding stock, and you took a queue from

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1 John Carpenter from Escape from New York and took the
 2 handgrips off of it, would that then potentially be a legal
 3 firearm in the State of Illinois, aside from the fact
 4 whether or not it's covered by name as a copy or duplicate?
 5 MR. MAAG: Objection to form. Compound.
 6 Legal conclusion.
 7 Q (By Mr. Maag) You can answer.
 8 **A If it had -- If it was not meeting the**
 9 **features definitional ban, then potentially.**
 10 Q Okay. Can you look at the next receiver in
 11 front of you? The next lower receiver. Does that say
 12 AR-15, AR-10 or anything remotely similar to that on there?
 13 **A It does not.**
 14 Q All right. And is that listed by make and
 15 model in the PICA banned list?
 16 **A No.**
 17 Q And what is the brand name on that?
 18 **A Benbow City Sports.**
 19 Q And what's the model?
 20 **A Model EE.**
 21 Q All right. And you have got an upper receiver
 22 in front of you?
 23 **A I do.**
 24 Q Does that fit that model EE?
 25 **A It appears to.**

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1 Q All right. Can you try it? Are you satisfied
 2 that they match?
 3 **A Yes.**
 4 Q All right. Can you try attaching the upper
 5 receiver on the Palmetto State Armory lower? And if you
 6 need to remove those plastic ties, feel free. Is that a
 7 match?
 8 **A It is not.**
 9 Q And why is that not a match?
 10 **A Because it's large gap in the back. While**
 11 **they may potentially fit together, they wouldn't**
 12 **necessarily safely function.**
 13 Q All right. Is it fair to say one is not a
 14 copy or a duplicate of the other, the lowers?
 15 **A Yes.**
 16 Q And are you familiar with the original AR-10?
 17 **A Fairly.**
 18 Q Was it semi-automatic, select fire or
 19 otherwise?
 20 **A Select fire, if I recall.**
 21 Q And where was it made?
 22 **A It was in the U.S.**
 23 Q Okay. Are you able to -- Are those receivers,
 24 any of those receivers in front of you, compatible with
 25 that original AR-10?

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1 **A Not without confirming that it would fit. I**
 2 **wouldn't be able to tell just from these parts. You can**
 3 **see the original AR-10 parts together as well.**
 4 MR. MAAG: Nothing further.
 5 MR. WELLS: Switch, and I'll ask a few more.
 6 EXAMINATION
 7 QUESTIONS BY MR. WELLS:
 8 Q Mr. Pulaski, are any of these items that
 9 Mr. Maag showed you laid out here on the table, are any of
 10 them yours?
 11 **A No.**
 12 Q Are any of them property of Piasa Armory?
 13 **A No.**
 14 Q You were asked about a Beretta styled
 15 magazine. Do you see it in here?
 16 MR. MAAG: It's in your hand.
 17 Q (By Mr. Wells) Sorry. Got it. And you were
 18 able to tell just by looking at that magazine that it's
 19 Beretta?
 20 **A Of that style, but it's not a Beretta branded**
 21 **magazine.**
 22 Q But it works in a Beretta pistol?
 23 **A I don't believe that it would.**
 24 Q Why not?
 25 **A That's a different brand.**

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1 Q What brand is it?
 2 **A I believe it's Taurus.**
 3 Q And you're able to tell that just from looking
 4 at it?
 5 **A Not from over there. No. I can't tell which**
 6 **brand that is. But Taurus and Beretta make similar**
 7 **magazines, but they don't necessarily fit each other.**
 8 Q So a Taurus magazine wouldn't necessarily work
 9 in a Beretta?
 10 **A Potentially, but it may not lock into the**
 11 **firearm.**
 12 Q And you see it has a 15 marking on that?
 13 **A It does.**
 14 Q What does that mean?
 15 **A In the industry it typically means the**
 16 **capacity.**
 17 Q So you can tell by looking at this magazine
 18 what the capacity is for that firearm based on that
 19 marking?
 20 **A In my experience, typically.**
 21 Q You were asked questions about if someone just
 22 handed you a magazine, you wouldn't necessarily be able to
 23 tell whether it was for a rifle or pistol. Do you recall
 24 that?
 25 **A Yes.**

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1 Q When customers come to you to purchase a
 2 magazine, do they typically know what firearm they are
 3 purchasing the magazine for?
 4 **A No.**
 5 Q They don't know at all?
 6 **A We oftentimes I need a magazine as the only**
 7 **statement from the customer. We ask them more clarifying**
 8 **questions, and their answers are usually for a certain**
 9 **caliber. We have to work with them to find out what type**
 10 **of gun that is for.**
 11 Q But you engage in a follow-up conversation
 12 with your customers; is that right?
 13 **A Yes.**
 14 Q And based on that conversation, you can direct
 15 them to a particular product?
 16 **A Yes.**
 17 Q And is that how things happen in the real
 18 world at Piasa Armory? People come in and see something
 19 and then you have conversations about them and then you
 20 direct them to a particular product that they are looking
 21 for?
 22 **A Typically.**
 23 Q Do you own an M1 carbine?
 24 **A I do.**
 25 Q Is it a rifle or pistol?

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1 **A Mine is a rifle.**
 2 Q If you were to replace the magazine for that
 3 M1 carbine, what round capacity would you purchase?
 4 **A Because it's a rifle, I would be required to**
 5 **do a 10-round magazine.**
 6 Q I think you were handed a 1911 frame. Do you
 7 recall that?
 8 **A Yes.**
 9 Q And Mr. Maag had you attach the stock to the
 10 1911. Do you recall that?
 11 **A Yes.**
 12 Q And at that point you called it a rifle; is
 13 that right?
 14 **A Yes.**
 15 Q Why did you call it a rifle?
 16 **A Because that is how the ATF defines it. So**
 17 **rifle or short-barreled rifle, presuming that's a complete**
 18 **firearm.**
 19 Q You were asked various questions about the
 20 receivers that are in front of you.
 21 **A Yes.**
 22 Q And by looking at the shape of the receiver,
 23 for something you were able to determine what type of
 24 caliber that the receiver would be suited for; is that
 25 right?

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1 **A Potentially.**
 2 Q Is that a yes?
 3 **A There's a variety of calibers that each**
 4 **receiver is suited for.**
 5 Q So, for instance, you were asked about, I
 6 believe, a lower receiver that would accept Glock
 7 magazines; is that right?
 8 **A Yes.**
 9 Q And you were able to identify just by looking
 10 at the receiver that it was likely to use Glock magazines;
 11 is that right?
 12 **A Yes.**
 13 Q With no other information other than just
 14 looking at the receiver itself?
 15 **A Based on the shape of the magazine well and**
 16 **the angle that it's in.**
 17 Q You were asked about the M1 Garand and a gas
 18 and bolt system that it used?
 19 **A Yes.**
 20 Q The M1 Garand predates the AK-47 by a long
 21 time; right?
 22 **A Yes.**
 23 Q You mentioned the Beretta AR-100. Do you
 24 remember that?
 25 **A I do.**

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1 Q And you would agree that the AR-100 shares a
 2 basic shape with AR-15 style rifles?
 3 **A Basic outline.**
 4 Q So, yes, a basic outline?
 5 **A Yes.**
 6 Q You were asked about a broom handle --
 7 **A Uh-huh (yes).**
 8 Q -- pistol, do you recall that?
 9 **A I do.**
 10 Q Do you own a broom handle pistol?
 11 **A I do.**
 12 Q Prior to PICA taking effect, did you sell
 13 broom handle pistols at Piasa Armory?
 14 **A Occasionally, yes. I bought mine from our**
 15 **company.**
 16 Q How many have you sold?
 17 **A I believe we have had about six come through**
 18 **over the years.**
 19 Q And that's since 2012 you sold six of that?
 20 **A Yes.**
 21 Q How many AR-15s have you sold since 2012?
 22 **A Many more than six.**
 23 Q How many? Just give me your best estimate.
 24 **A Approximately 400 to 500 a year.**
 25 Q So since 2012, 500 times 10, just going

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1 through 2022, that's 5,000?
 2 **A Approximately.**
 3 Q You were asked about the Norinco 86S. Do you
 4 recall that?
 5 **A Yes.**
 6 Q And the Norinco 86S looks like an AK?
 7 **A The receiver looks like an AK, but the rest of**
 8 **the firearm looks nothing like an AK.**
 9 Q You were asked about a receiver that had an M4
 10 marking on it. Do you remember that?
 11 **A Yes.**
 12 Q There's something called an M4 carbine; right?
 13 **A There is.**
 14 Q And an M4 carbine is a carbine that's derived
 15 from the M-16; right?
 16 **A Yes.**
 17 Q And the M-16 is derived from the AR-15?
 18 **A Yes.**
 19 Q So the M4 carbine -- In some instances, an M4
 20 carbine can be an AR-15 style rifle; right?
 21 **A M4 carbine is specifically marked on the**
 22 **firearm. Colt, for example, uses that as a brand name or a**
 23 **frontline name and their receivers are marked M4 carbine.**
 24 Q And that's an AR-15 style rifle?
 25 **A It's a variant of the AR-15.**

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1 Q You were asked about the H&K MR 566. Do you
 2 recall that?
 3 **A Yes.**
 4 Q And the 556 there refers to 556 caliber
 5 ammunition?
 6 **A Typically.**
 7 Q And that 556 caliber ammunition is a common
 8 type of ammunition for an AR-15?
 9 **A It is.**
 10 Q I think you were also asked about the Kel-Tec
 11 SUB2000 Gen2. Do you recall that?
 12 **A I didn't. It's a generation, but yes.**
 13 Q And is the Kel-Tec SUB2000 a pistol caliber
 14 carbine?
 15 **A It is a -- the Kel-Tec refers to it as**
 16 **typically, yes.**
 17 Q What is a pistol caliber carbine?
 18 **A Usually pistol caliber carbines are rifle**
 19 **length firearms, so 16-inch barrel or greater, that uses a**
 20 **traditionally pistol caliber round.**
 21 Q The Beretta CX4 Storm, is that also a pistol
 22 caliber carbine?
 23 **A It is.**
 24 Q I think you were handed a receiver as well and
 25 you were asked about whether the receiver could be combined

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1 with different parts to make it into an assault weapon as
 2 defined under PICA. Do you recall that?
 3 **A Yes.**
 4 Q The receiver itself, in order for someone to
 5 combine it with other parts to bring it within the
 6 definition of PICA, that person would have to know about
 7 the particular parts that they are assembling; right?
 8 **A The receiver itself is a banned part, because**
 9 **it's a part that be used to assemble an assault weapon.**
 10 Q Maybe I'm misremembering what you were talking
 11 about earlier, but you were specifically testifying about a
 12 receiver that could be used for a pistol that would not be
 13 covered by PICA. Do you recall that?
 14 **A Right.**
 15 Q And that same receiver could also be used and
 16 combined with other parts to become a receiver for a rifle
 17 with certain features that would bring it into PICA; right?
 18 **A Potentially.**
 19 Q So a person designing that, they would have to
 20 know how to put the different parts together; right?
 21 **A They would.**
 22 Q And they would have to specifically choose
 23 particular parts to combine with that receiver?
 24 **A Yes.**
 25 Q And in the course of doing that, they would

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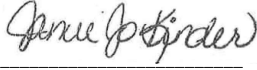
1 make choices about whether to combine specific parts to
 2 reach a certain desired firearm at the end of the day;
 3 right?
 4 **A Yes.**
 5 Q You were showed a couple of receivers and you
 6 described them as standard AR-15 lowers. Do you recall
 7 that?
 8 **A I don't recall that.**
 9 Q I believe Mr. Maag may have used the phrase
 10 standard AR-15 lowers. Are you familiar with that
 11 terminology?
 12 **A I am.**
 13 Q What is a standard AR-15 lower?
 14 **A A standard AR-15 lower looks similar to this**
 15 **on the outside, but is different on the internal dimensions**
 16 **and magazine.**
 17 Q Okay. Is there a standard AR-15 lower in
 18 front of you on the table?
 19 **A No.**
 20 Q But when Mr. Maag was using the term standard
 21 AR-15 lower, you understood what he meant?
 22 **A I did.**
 23 Q And the "this" that you were just pointing to,
 24 when you said it looks like this, that was the lower
 25 receiver that uses Glock magazines; is that right?

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1 **A Yes.**
 2 Q You mentioned when you combined a lower
 3 receiver and an upper receiver, one of which was from
 4 Palmetto, do you recall that?
 5 **A Yes.**
 6 Q And they didn't exactly line up; is that
 7 right?
 8 **A Yes.**
 9 Q And if a person were to combine those, the
 10 lower receiver and the upper receiver, you said it wouldn't
 11 safely function; is that right?
 12 **A Correct.**
 13 Q What did you mean?
 14 **A The firearm may not function properly. It**
 15 **may -- Because there's an opening in the back, they could**
 16 **have a pinch or safety point that they could get an**
 17 **extremity into.**
 18 MR. WELLS: Subject to my prior objections, I
 19 don't have anything further at this time.
 20 MR. MAAG: You have the option to read this
 21 transcript looking for typographical errors. You cannot
 22 change an answer, except for correcting a typographical
 23 error. You don't have to read it. You can waive
 24 signature. But it's up to you. I have no preference.
 25 **THE WITNESS: What's the standard for such?**

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1 MR. MAAG: It's whatever the witness wants to
 2 do.
 3 **THE WITNESS: I trust the court reporter.**
 4 MR. MAAG: So you waive?
 5 **THE WITNESS: I'll waive.**
 6 MR. MAAG: Okay. Thank you.
 7 THE VIDEOGRAPHER: This ends the
 8 video-recorded deposition of Scott Pulaski. We are going
 9 off the record. The time now is 6:04.
 10
 11 SIGNATURE WAIVED, BY AGREEMENT OF COUNSEL
 12 AND WITNESS.
 13
 14 (Deposition was adjourned at 6:05 p.m.)
 15
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 17
 18
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<p>1 CERTIFICATE OF REPORTER</p> <p>2</p> <p>3 I, Jamie Jo Kinder, CCR No. 842, CSR No.</p> <p>4 084.003306, do hereby certify that the witness whose</p> <p>5 testimony appears in the foregoing deposition was duly</p> <p>6 sworn by me; that the testimony of said witness was taken</p> <p>7 by me to the best of my ability and thereafter reduced to</p> <p>8 typewriting under my direction; that I am neither counsel</p> <p>9 for, related to, nor employed by any of the parties to the</p> <p>10 action in which this deposition was taken, and further that</p> <p>11 I am not a relative or employee of any attorney or counsel</p> <p>12 employed by the parties thereto, nor financially or</p> <p>13 otherwise interested in the outcome of the action.</p> <p>14 </p> <p>15 _____</p> <p>16 Certified Shorthand Reporter</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> <p>25</p>	

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