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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS

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

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

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

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ALSO PRESENT:

SHELBY BAIRD SMITH, ESQ., NSSF

ALSO PRESENT: (Via video conference)

DAVID G. SIGALE

THOMAS G. MAAG

T. ADAM HOERNER

KERRY BANAHAN

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1 (WHEREUPON, the witness was  
2 duly sworn.)

3 JIM CURCURUTO,  
4 called as a witness herein, having been first duly  
5 sworn, was examined and testified as follows:

6 EXAMINATION

7 BY MR. HAZINSKI:

8 Q. Good morning, Mr. Curcuruto. My name is  
9 John Hazinski. I'm an attorney for the defendants  
10 in the Barnett case, Attorney General Kwame Raoul,  
11 Illinois State Police Director Brendan Kelly.

12 You've been deposed before, correct?

13 A. Yes.

14 Q. About how many times?

15 A. Seven, I believe.

16 Q. You're a bit of an old hand at this, but  
17 I'll go over some ground rules just to make sure  
18 everything runs smoothly today.

19 A. Sure.

20 Q. Today you were just sworn in.

21 Do you understand that you're under oath  
22 the same as if you were testifying in court?

23 A. Yes.

24 Q. Since the court reporter here is taking

1 down everything we say, I'll try to do my best to  
2 avoid talking over you, and I ask that you try to  
3 do the same, okay?

4 A. Yes.

5 Q. If I ask a question that you don't  
6 understand, please ask me to clarify. Because if  
7 you do answer the question, I'll assume that you  
8 understood it; is that fair?

9 A. Yes.

10 Q. From time to time the lawyers may  
11 interpose objections which is all right. You  
12 should answer the question even if there is an  
13 objection. The exception to that is only if you're  
14 expressly instructed not to answer.

15 Does that make sense?

16 A. Yes.

17 Q. You are welcome to take a break whenever  
18 you'd like, but I just ask that you not take a  
19 break while I have a question pending; is that  
20 fair?

21 A. Yes.

22 Q. Do you have any medical conditions or are  
23 you on any medication that could interfere with  
24 your ability to give truthful testimony today?

1 A. No.

2 Q. Could you please state your full name for  
3 the record?

4 A. James Curcuruto.

5 Q. Could you spell your last name, please?

6 A. C-U-R-C-U-R-U-T-O.

7 Q. What did you do to prepare for they  
8 deposition?

9 A. Received a call from Larry Keen from NSSF,  
10 oh, a month or so ago.

11 (Reporter clarification.)

12 THE WITNESS: Received a call from Larry Keen  
13 about a month or so ago asking if I was available  
14 to do this. I said yes, and he introduced me to  
15 Jim Boats who I had worked with previously.

16 And Jim sent me, I believe, three  
17 different documents to review. One was some old  
18 emails while I was employed at NSSF. Another was a  
19 deposition that I had done, a transcript of it,  
20 from I believe 2013, I believe Cook County. And  
21 the third was a copy of a deposition that was just  
22 done of Salam from NSSF. And I reviewed those  
23 documents.

24 Q. Just those three documents in total that



1 you reviewed?

2 A. I had also taken up -- well -- I know we  
3 had a phone call to discuss procedure and along the  
4 lines there, but I believe those are the three main  
5 documents. I can't recall if I looked at anything  
6 else in detail.

7 MR. VOGTS: Could I interrupt? An attorney,  
8 apparently David Sigale, wants to get in. He says  
9 he has to be admitted.

10 (WHEREUPON, a discussion was had  
11 off the record.)

12 BY MR. HAZINSKI:

13 Q. So you mentioned talking to Jim?

14 A. Correct.

15 Q. And is he representing you today for the  
16 purposes of this deposition?

17 A. I believe Andrew is.

18 MR. LOTHSON: I am. We are, yes.

19 BY MR. HAZINSKI:

20 Q. Okay. Now, I don't want to know anything  
21 you spoke about with the attorneys that are  
22 representing you because that's privileged, but can  
23 you tell me how many times you met with them or  
24 spoke with them to prepare?

1 A. One, maybe two phone calls with Jim, and  
2 then yesterday I met with Jim and Andrew here.

3 Q. How long was that meeting yesterday?

4 A. About an hour.

5 Q. And you mentioned reviewing three  
6 documents, the transcript of the deposition of  
7 Salam Fatohi, a transcript from a Cook County case  
8 you estimated in 2013, and what was the other  
9 document?

10 A. Let's see. I got some emails that I was  
11 part of prior to my departure from NSSF were the  
12 three that were sent to me via email, and then  
13 yesterday we did briefly review or talk about, not  
14 in detail, a firearm retailer survey and a modern  
15 sporting rifle study that I had worked on  
16 previously, and a magazine chart as well.

17 Q. Other than those did you review any other  
18 documents in preparation for the deposition?

19 A. I don't believe so.

20 Q. You mentioned a phone call with Larry  
21 Keen. Who is Larry Keen?

22 A. Larry Keen is general counsel at National  
23 Shooting Sports Foundation.

24 Q. Other than Larry Keen and your attorneys,

1 did you discuss this deposition with anybody else?

2 A. Just my wife to let her know I'd be down  
3 here.

4 Q. Are you being compensated for your  
5 testimony here?

6 A. I am. NSSF is gonna be covering my travel  
7 costs and hourly rate.

8 Q. And what's your hourly rate?

9 A. \$150 per hour.

10 Q. Where are you currently employed?

11 A. I am executive director of Outdoor  
12 Stewards of Conservation Foundation.

13 Q. What are your responsibilities in the role  
14 of executive director?

15 A. I run the entire organization. It's a  
16 nonprofit organization.

17 Q. What is the purpose of that organization?

18 A. Our mission is to work with all groups to  
19 help support recruitment of new hunters, anglers,  
20 trappers and shooters, and promote the positive  
21 contributions of what we call HATS, H-A-T-S, which  
22 stands for hunters, anglers, trappers and shooters.

23 Q. Do you have any employment other than your  
24 role at Outdoor Stewards of Conservation?

1           A.    I also have a LLC for some consulting  
2    called Outdoor Insights, LLC.

3           Q.    What's the purpose of that LLC?

4           A.    Just to -- if I have somebody that is  
5    looking to hire somebody for support on research on  
6    the hunting industry or outdoor industry, that's  
7    kind of my arm for that as well.

8                    So, for example, if somebody needed me for  
9    a place like today, I could help out through the  
10   Outdoor Insights as well or -- you know, with this  
11   instance I'll probably just bill under  
12   Jim Curcuruto as a personal one.

13          Q.    So who are your typical clients for your  
14   consulting work?

15          A.    It's been a while. You know, when I first  
16   left NSSF I did some research projects for some  
17   manufacturers within the firearms and ammunition  
18   industry. And I also use that to consult for some  
19   grant work on conservation focused grant work, wild  
20   life conservation.

21          Q.    Which firearms manufacturers were your  
22   consulting clients?

23          A.    I prefer not to answer just out of  
24   confidentiality.

1 Q. Did you -- did you reach agreements with  
2 those clients to keep the nature of your  
3 relationships confidential?

4 A. No, more of a personal business decision.

5 Q. How many firearms manufacturers have you  
6 had as clients?

7 A. More ammunition manufacturers. One  
8 firearm, one ammunition.

9 Q. So you had one client who is a firearm  
10 manufacturer, one client that was an ammunition  
11 manufacturer and no others; is that fair?

12 A. Correct. Other than the grant work that I  
13 did for conservation.

14 Q. The firearms manufacturer that was your  
15 client, can you describe in general terms the kinds  
16 of things they manufactured?

17 A. Handguns and long guns.

18 Q. In the past have you stated that you were  
19 available to testify as an expert witness on behalf  
20 of the firearms industry?

21 A. Correct.

22 Q. Have you ever done so?

23 A. Through the depositions.

24 Q. Were you retained by the parties in those

1 cases to provide that testimony, meaning paid for  
2 that testimony?

3 A. I believe so in 2021, maybe January or  
4 February, one case I did get paid.

5 Q. Did you prepare written reports in any of  
6 those cases?

7 A. I don't recall.

8 Q. Have you prepared a written report in this  
9 case?

10 A. I don't believe I did.

11 Q. And just for context or clarity, this is a  
12 case concerning a law called the Illinois --  
13 Protect Illinois Communities Act regulating assault  
14 weapons and large capacity magazines in the State  
15 of Illinois.

16 Before you worked at Outdoor Stewards of  
17 Conservation where did you work?

18 A. I had the consulting business that I  
19 started right after I left National Shooting Sports  
20 Foundation, and prior to that I was with National  
21 Shooting Sports Foundation for 11 years.

22 Q. I want to the circle back briefly on the  
23 consulting work.

24 What was the nature of the research

1 projects that you conducted for firearms  
2 manufacturers?

3 A. Firearms and ammunition industry research.

4 Q. When you say industry research, can you  
5 clarify what that means?

6 A. Market on firearms and ammunition.

7 Q. Does that refer to the consumer market?

8 A. Consumer market, yes.

9 Q. And approximately when did you engage in  
10 those research projects?

11 A. Early 2021.

12 Q. Both of them?

13 A. Correct.

14 Q. What was your first role at NSSF?

15 A. Director of industry research and analysis  
16 I believe was my original title.

17 Q. What were your responsibilities in that  
18 role?

19 A. I directed most of the consumer related  
20 research and business related research for National  
21 Shooting Sports Foundation. I managed one direct  
22 report as well as several relationships we had with  
23 outside researching agencies.

24 Q. Who was the direct report you managed?

1 A. Dianne Vrablic.

2 Q. Did you have any other roles at NSSF?

3 A. I did switch titles maybe -- trying  
4 to -- 2017, '18, approximately to director of  
5 research and market development.

6 Q. How did your responsibilities change, if  
7 at all, when you made that transition?

8 A. I added -- kept what I had and added  
9 responsibilities for what is called recruit,  
10 retain, reactivate, or what we called R3, new  
11 customers to the market, keep the ones that you  
12 have and reactivate lapsed participants.

13 Q. In your lateral role at NSSF, did you  
14 supervise anyone other than Dianne Vrablic?

15 A. Not directly.

16 Q. Was that a department of its own within  
17 NSSF?

18 A. A team of two.

19 Q. A team of two.

20 Was that team of two responsible for  
21 conducting all of NSSF's research endeavors?

22 A. The vast majority consumer. They also had  
23 a legal team that did more of the legislative  
24 research.



1 Q. Did anyone at NSSF ever express any  
2 concerns about the overall quality of your work?

3 A. At NSSF, no.

4 Q. Did anyone at NSSF ever express any  
5 concerns that the results of your research or  
6 analysis were not accurate?

7 A. Not that I recall.

8 Q. These days are you in touch with anyone at  
9 NSSF on a regular basis?

10 A. You want to define regular?

11 Q. Do you speak to anyone at NSSF more than  
12 once a year?

13 A. Yes.

14 Q. Who?

15 A. Dianne Vrablic, catch up with her and see  
16 how the family's doing on a quarterly basis. And  
17 then I consult for NSSF on a project with the team  
18 lead being John McNamara.

19 Q. What's the nature of that project?

20 A. It's regarding building shooting ranges  
21 with excised tax dollars for state wild life  
22 agencies to have more recreational opportunities  
23 for folks to go target shooting.

24 Q. Other than that project, do you have any

1 other -- strike that.

2 Other than that project, since you left  
3 NSSF have you had any other business or  
4 professional relationship with that organization?

5 A. I believe that's it.

6 Q. Your relationship with Dianne Vrablic, is  
7 that strictly personal or is it also an ongoing  
8 professional relationship?

9 A. 95 percent personal just to catch up with  
10 her family and kids and hear her stories. Every  
11 once in a while we might talk about the latest  
12 research project or something along the lines  
13 there.

14 Q. Does she still work at NSSF?

15 A. Yes.

16 Q. In a research capacity?

17 A. I believe so.

18 Q. Do you ever discuss the research that  
19 they're doing?

20 A. Very top level, not in detail. I'd rather  
21 hear about her kids.

22 Q. Since you left NSSF has anyone at that  
23 organization, other than Larry Keen when he called  
24 you recently, contacted you to specifically discuss

1 your work there?

2 A. I don't believe so. It's been about four  
3 years. So there may have been a call along the  
4 lines, but nothing that I can recall.

5 Q. Did anyone ever -- from NSSF ever call you  
6 expressing any concerns about your work or your  
7 research there in the time since you left?

8 A. No.

9 Q. What's your highest level of education?

10 A. Bachelor of Science in 1993 in business  
11 management.

12 Q. Did you also receive a bachelor's in  
13 business administration?

14 A. I believe it was associate's from SUNY  
15 Cobleskill, and then a bachelor's from University  
16 of North Carolina, Wilmington.

17 Q. Other than those programs do you have any  
18 other college or university level education?

19 A. I do not.

20 Q. Did you take any statistics classes for  
21 your degrees?

22 A. I believe I took statistics somewhere  
23 along my college career.

24 Q. Do you know what the nature of that

1 coursework was?

2 A. Just part of the requirements to get a  
3 business degree.

4 Q. Have you received any other formal  
5 education in statistics apart from that?

6 A. I don't believe so. I did some continuing  
7 education at places like Merrick of Management  
8 Association, Burke Institute, primarily more  
9 research focused.

10 Q. Can you describe that work?

11 A. I believe one of the classes I took with  
12 Burke Institute was focus group moderation, and  
13 another one may have been survey questionnaire  
14 development.

15 Q. When did you take those courses?

16 A. Approximately 2012 to 2015.

17 Q. Through your professional experience and  
18 your coursework have you developed any familiarity  
19 with statistical or research methods?

20 A. I worked very closely with several Ph.D.s  
21 and statisticians for 11 years. And I learned, you  
22 know, from them as I was going, but nothing formal.

23 Q. When you were acting as a director of  
24 research at NSSF, did you feel that you had an

1 understanding of basic statistic principles?

2 A. I left that up to the folks that we  
3 contracted.

4 Q. Did you contract for all of NSSF research  
5 or just for some of it?

6 A. Some.

7 Q. In cases where the research was being done  
8 by NSSF and not a contracted organization, who was  
9 responsible for overseeing the statistical aspects  
10 of that research?

11 A. We did internally several simple, not very  
12 statistically heavy oriented projects such as  
13 surveys to our membership and creating Excel type  
14 of documents that were simple math, not statistical  
15 analysis.

16 Q. Fair to say that the research that NSSF  
17 was conducting in-house was of a nature that didn't  
18 require in your view a high degree of statistical  
19 organization?

20 A. Correct.

21 Q. Do you have an understanding of the term  
22 sample size?

23 A. I do.

24 Q. Generally speaking, what's that?

1           A.     When you send out a survey, for example,  
2     you want to reach a minimum requirement sample size  
3     of people that have completed that study to  
4     receive, what we always used, a 95 percent  
5     confidence and 5 percent margin of error at a  
6     minimum on the stuff that we did. Whether that was  
7     internally or externally, that was what we strived  
8     to accomplish.

9           Q.     You used the term 95 percent confidence.  
10           Can you explain what that means?

11          A.     Sure. You have a hundred answers -- or if  
12     the answer to a question is a hundred, 95 percent  
13     of the time it's gonna be within 5 percent of that  
14     hundred.

15          Q.     Do you have an understanding of how to  
16     calculate the level of confidence associated with  
17     the sample?

18          A.     Yeah, there's formulas for that. You can  
19     just plug it in. We use the online formula. If  
20     your sample audience was a thousand, you plug that  
21     in. And to get a 95 and 5 confidence level, it  
22     would spit out, you need an N of X to meet that  
23     requirement. So that was what we tried to obtain.

24          Q.     And those were the standards you were

1 applying in the research done at NSSF?

2 A. The minimum, yeah.

3 Q. When you were going through the hiring  
4 process at NSSF, do you recall whether anyone asked  
5 you about your knowledge of statistics or data  
6 analysis?

7 A. I'm sure the topic came up, but that was  
8 in 2009, so it's been quite sometime.

9 Q. Fair enough.

10 Generally speaking, could you describe the  
11 purpose of the research that NSSF conducted while  
12 you were there?

13 A. Sure. NSSF is a trade association for the  
14 firearms and ammunition industry. So one of the  
15 services or member benefits that we provided was  
16 industry research so our members would be more  
17 informed of current market decisions so they could  
18 make better business decisions.

19 Q. Are there any other purposes of the  
20 research that NSSF was conducting?

21 A. That was the primary one at the time. One  
22 of the other purposes was to use the findings, the  
23 insights we gained to then build programs to help  
24 with what we call the R3, you know, the recruit,

1 retain, reactivate more participants in target and  
2 hunting shooting.

3 Q. Were you aware when you worked at NSSF  
4 that any of their research or reports were being  
5 used in litigation?

6 A. When I first started there was not a lot,  
7 if any, when I originally started discussion about  
8 litigation cases. It wasn't until several years  
9 into the employment that it seemed like that became  
10 more prevalent within the organization.

11 Q. Approximately what year would that have  
12 been?

13 A. Approximately, ballpark because it's been  
14 a while, 2012. So three years in maybe. I believe  
15 that was that first case in Cook County that kind  
16 of brought it to my attention anyways.

17 Q. Do you recall what aspect of NSSF's  
18 research or analysis was at issue there?

19 A. Sure. The primary -- the two primary  
20 parts that stand out are commonality of AR or AK  
21 platform firearms which we called modern sporting  
22 rifles, and the second was the magazine capacity  
23 handguns and long guns.

24 Q. Did you have an understanding at the time



1 of how NSSF's research would be relevant to those  
2 questions?

3 A. Not specific to litigation, but certainly  
4 they were questions that our membership had  
5 questions about. And we had a long list of  
6 research topics that we needed to conduct to fill a  
7 lot of voids, and those were on the list.

8 Q. Can you explain what you mean when you say  
9 that they were topics that your membership had  
10 questions about?

11 A. Sure. So being the director of research  
12 and being a member-based organization, I would ask  
13 our members what -- you know, what would you like  
14 to know on the topics of the industry to help you  
15 better understand conditions and make better  
16 decisions.

17 And I had a long list of everything from  
18 first-time gun buyers to female participation to  
19 market segmentation to economics to handgun market,  
20 modern sporting rifle market, those type of things.

21 So I tried to check them off one at a time  
22 as what I thought was important, but modern  
23 sporting rifles was certainly a topic that a lot of  
24 our members had interest in.

1 Q. How did you find out from membership that  
2 they were interested in those topics? Was it  
3 through any kind of formal survey or through  
4 informal conversations?

5 A. Informal conversations.

6 Q. Did you keep an actual written list of  
7 those topics?

8 A. I would imagine I did. I just don't  
9 recall.

10 Q. And since it was a long list, it sounds  
11 like you had to make judgments about which topics  
12 to prioritize?

13 A. Correct, yeah.

14 Q. Was anybody else besides you responsible  
15 for deciding on which topic NSSF would study next?

16 A. You know, I had supervisors that I  
17 reported to, but -- maybe one or two times they may  
18 have suggested a topic, but they left it up to me  
19 which was kind of nice to have that freedom to go  
20 my own direction.

21 Q. Why did you stop working at NSSF?

22 A. I believe in January 2021 the SHOT show,  
23 which is shooting hunting outdoor trade show,  
24 S-H-O-T, is owned and operated by NSSF, and that is

1 a large chunk of their revenue, and with COVID they  
2 did not have that SHOT show.

3 So they had to make cuts, and my position  
4 was involved in the cuts. So I believe it was  
5 early January 2021 when I was let go.

6 Q. So it sounds like it was a budgetary  
7 rationale?

8 A. Correct.

9 Q. Did anyone at NSSF ever tell you that you  
10 were being let go for reasons related to your  
11 performance?

12 A. No, strictly financial decision.

13 Q. Who made the decision to let you go?

14 A. I assume it's the executive team.

15 Q. Who was on the executive team at the time?

16 A. I believe Larry Keen, Joe Bartozzi who's  
17 the president, Deb Kenny who was vice president of  
18 HR, and Chris Dolnack and John -- sorry, John our  
19 CFO at the time. I don't recall his last name at  
20 this time. Sorry.

21 Q. Do you know whether anyone replaced you in  
22 your role once you left?

23 A. I don't know if they did immediately, but  
24 there was somebody that had worked -- Salam, who

1 had worked on the legislative side in research, I  
2 believe he then -- all responsibilities got moved  
3 over to him which he was in for a big surprise  
4 because I did a lot there.

5 Q. And you read his deposition in  
6 preparation --

7 A. I did.

8 Q. -- to testify today?

9 A. Yes. Sorry about that.

10 Q. No problem.

11 Based on reviewing his deposition, do you  
12 have an understanding of whether his  
13 responsibilities are the same as the ones you had  
14 or whether they differ in any important way?

15 A. I don't -- I believe they differ. Key  
16 difference is he's more legislation or litigation.  
17 I tried not to, you know, delve into that because  
18 they had that department.

19 And I did more of the conservation and  
20 participation. I worked with the state wild life  
21 agencies on that R3. And I don't know who handles  
22 that now, if anybody.

23 Q. And it sounds like that aligns more with  
24 your interests as well?

1 A. You got it.

2 Q. When you say Salam Fatohi is more focused  
3 on legislation, can you explain that?

4 MR. LOTHSON: And I'll object to the form of  
5 the question. Salam's testimony speaks for itself.

6 Jim, you can answer if you know.

7 THE WITNESS: Sure. We had different  
8 departments within NSSF, a media department, a  
9 government relations department and a member  
10 services. I was part of the member services with  
11 the research we did, and he was part of the  
12 government relations with the research he did.

13 BY MR. HAZINSKI:

14 Q. From your understanding just based on what  
15 you reviewed, it struck you that that legislation  
16 or litigation aspect was more relevant to his work  
17 than it was to your work?

18 A. Correct.

19 Q. We mentioned earlier your role as a  
20 witness in a number of lawsuits.

21 Do you recall that?

22 A. Correct.

23 Q. Were those lawsuits all cases involving  
24 challenges to regulations of firearms or magazines?

1           A.    I believe so, yes.  Main topics of, you  
2 know, AR platform, modern supporting rifles or  
3 capacity of magazines.

4           Q.    Based on what you remember about those  
5 cases, do you know whether the reliability or  
6 accuracy of any of the research that you conducted  
7 was a contested issue in those cases?

8           A.    The opposing lawyers certainly asked a lot  
9 of questions about how that research was done, but  
10 we were very confident in providing the best  
11 available information to our membership at the  
12 time.

13          Q.    Do you recall which pieces of your  
14 research were at issue?

15          A.    I believe everything that we submitted,  
16 you know, they had questions on primarily, you  
17 know, our modern sporting rifle consumer study and  
18 the magazine chart.  And I believe several  
19 doc -- or reports were included.  One that comes to  
20 mind I believe was the annual consumer -- annual  
21 retailer survey as well.

22          Q.    Did anything that you learned or were  
23 shown in those cases when you were a witness change  
24 your own view about the reliability or accuracy of

1 any research you had conducted?

2 A. I was very comfortable with how I had  
3 always conducted research. You know, I felt like I  
4 was supporting our membership, and the last thing I  
5 wanted to do was provide them with misinformation.

6 They make a business decision that doesn't  
7 turn out well, and they're gonna be mad at me,  
8 right? So I want to make sure that whatever I put  
9 out was to the highest standard that I could.

10 Q. Do you know whether any courts have found  
11 that any research you helped conduct at NSSF was  
12 unreliable?

13 A. I don't recall. You know, I recall with  
14 the six or seven different cases that some court  
15 cases moved forward and some didn't, but I don't  
16 know if it was due to my research.

17 Q. Would it be a fair summary of your  
18 testimony to say that your role as a witness in  
19 these cases didn't do anything to kind of undermine  
20 your confidence in the work that you had done?

21 A. Correct, yeah. Like I said, I was  
22 confident in what I did. And certainly, you know,  
23 there were a lot of questions that came that made  
24 me realize that I wanted to even put out a better

1 product so there would be less questions, you know,  
2 not only from -- you know, mainly from our members,  
3 right? We don't want them to question anything  
4 that we're putting out.

5 So I already had a high standard. I just  
6 made sure to keep that and maybe even get it better  
7 if possible.

8 Q. Can you give me an example of any areas  
9 where you saw room to do a better version?

10 A. I recall a specific example in a report I  
11 had, and I don't remember the report that was an  
12 exhibit, but on one page -- and I'm making up the  
13 number. It was like 17.1000, and on another page  
14 it just said 17,000. And the opposing lawyer's  
15 like what's the difference. I must have rounded  
16 down. So like it wasn't major, but it was still  
17 something that I could improve upon moving forward.

18 Q. Any other examples of issues like that  
19 come to mind?

20 A. No. That's the one that stands out, yeah.

21 Q. So I want to ask some terminology  
22 questions to make sure we're on the same page  
23 before we go forward. And to the extent possible,  
24 I'd like you to answer based on your understanding



1 during the time that you worked at NSSF, not based  
2 on your understanding now if it happens to be  
3 different.

4 Does that make sense?

5 A. Sure.

6 Q. And to the extent that your understanding  
7 of any terms changed or evolved while you were at  
8 NSSF, please tell me that, okay?

9 A. Okay.

10 Q. Do you have an understanding of the  
11 definition of a pistol versus a handgun?

12 A. So thinking back, you know, at NSSF when I  
13 originally started, which I believe you wanted me  
14 to do, there's a report that the ATF put out on  
15 annual firearm production in the U.S., and in that  
16 it had, I believe, a heading pistols, and under  
17 pistols, you know, there's two types of  
18 hand -- like a semi-automatic handgun and a  
19 revolver.

20 So I believe both of those would be  
21 considered pistols, but there's -- you know, under  
22 the category pistol you could have handgun or a  
23 revolver.

24 Q. And those data also differentiated between

1 pistols and rifles, correct?

2 A. That -- yeah, the ATF, what we'll call  
3 AFMER, A-F-M-E-R, it had information on pistols and  
4 long guns, but long guns broken down between rifles  
5 and shotguns.

6 Q. Okay. As you understand the terms, are  
7 there any pistols that are also rifles?

8 A. When I originally started, no.

9 Q. Did that change while you worked there?

10 A. Correct, yeah. So you said, you know, to  
11 try to remember or recall when I was at NSSF, but  
12 now, you know, as markets evolve and consumer  
13 demands evolve and new products come out, I believe  
14 there is a category of a handgun that looks more  
15 like a longer gun, but I am not familiar with that  
16 category at all.

17 Q. Would it be fair to say that that category  
18 wasn't something you were aware of or thinking  
19 about while you were still at NSSF?

20 A. Correct. It seemed to evolve toward the  
21 end of my career there.

22 Q. In general, what does the term modern  
23 sporting rifle mean?

24 A. Modern sporting rifle at NSSF defined it

1 as a semi-automatic rifle capable of the -- holding  
2 a detachable magazine. And it would fire one round  
3 with every pull of the trigger and particularly --  
4 or specifically AR and AK platform.

5 Q. Baseline definition would be a  
6 semi-automatic rifle with detachable magazine and  
7 specifically focused on AR and AK platform rifles?

8 A. And one pull of the trigger equals one  
9 round fired.

10 Q. And that would be -- my understanding is  
11 that's typical of a semi-automatic firearm, right?

12 A. Correct, whether traditional which is not,  
13 you know, a semi-automatic -- or not a modern  
14 sporting rifle or the modern sporting rifle.  
15 Semi-automatic rifle is both traditional and modern  
16 sporting rifle.

17 Q. Did the term modern sporting rifle  
18 encompass any rifles that were not on the AR or  
19 AK platforms?

20 A. When I was originally with NSSF that was  
21 our primary definition.

22 Q. Did the term modern sporting rifle include  
23 any pistols?

24 A. Not when I originally started at NSSF.

1 Q. At the time you finished working at NSSF  
2 did it include any pistols?

3 A. I'm trying to remember, you know, when  
4 they kind of became prevalent, and it wasn't  
5 anything I focused on. I would imagine some  
6 other -- maybe internally there might have been  
7 some discussion about it, but not under, you know,  
8 my responsibilities.

9 Q. For the purposes of your own work did you  
10 ever count pistols within the category of modern  
11 sporting rifle?

12 A. I did not.

13 Q. For the purposes of your own work did you  
14 ever count -- strike that.

15 For the purposes of your own work at NSSF  
16 did you ever count any shotguns as part of the  
17 category modern sporting rifles?

18 A. I did not. You know, there's -- again,  
19 some manufacturers may have had small production  
20 numbers that I didn't go out of my way looking for  
21 them to include in that, not the handguns or the  
22 shotguns.

23 But they started to become you know, more  
24 available later, you know, in my career at NSSF,

1 but I didn't go out of my way looking to form a  
2 list of them. We just focused primarily on AR and  
3 AK rifles.

4 Q. Are you familiar with types of rifles that  
5 are chambered for 50 caliber BMG ammunition?

6 A. Most of that came from reading Salam's  
7 deposition, and it confused me.

8 Q. Fair enough. I can relate.

9 Did the your definition of modern sporting  
10 rifles that you used in your work at NSSF include  
11 any rifles chambered for 50 caliber BMG ammunition  
12 as far as you know?

13 A. Not as far as I know.

14 Q. When did you first hear the term modern  
15 sporting rifle?

16 A. When I started in 2009 it was already  
17 being used by NSSF.

18 Q. Through your work at NSSF did you have any  
19 understanding of where that term originated?

20 A. I believe it originated within NSSF.

21 Q. Thorough your work at NSSF did you develop  
22 any understanding of why NSSF developed that term?

23 A. I think there was a lot of definitions or  
24 people calling it different things, so they wanted

1 to have a common term for it. So they came up with  
2 modern sporting rifle. And again that encompassed  
3 AR and AKs, and I don't know if it's expanded since  
4 then.

5 (Reporter requests a break.)

6 MR. HAZINSKI: Of course. Let's take a break.

7 (WHEREUPON, a short recess was  
8 taken.)

9 MR. HAZINSKI: We're back on the record. It is  
10 10:55 by my watch. I would like to show you an  
11 exhibit. I have copies for those in the room. And  
12 for the record it's with the Bates range NSSF 17  
13 through 34.

14 (WHEREUPON, Curcuruto Deposition  
15 Exhibit No. 1 was marked for  
16 identification.)

17 BY MR. HAZINSKI:

18 Q. Mr. Curcuruto, have you seen this  
19 document?

20 A. Let me take a quick look through it. I  
21 don't know if I've seen this exact document.

22 Q. Take as much time as you need to review  
23 it.

24 MR. LOTHSON: We may be here for 20 minutes.

1 THE WITNESS: Okay. It looks familiar. I  
2 don't know if it's an exact report I worked on, but  
3 I worked on several iterations of a similar report.

4 BY MR. HAZINSKI:

5 Q. Have you had a chance to look through  
6 every page of it?

7 A. Briefly, yes.

8 Q. What type of report is this?

9 A. We call this an Industry Intelligent  
10 Report, and this one's titled Firearm Production in  
11 the U.S. With Firearm Import and Export Data.

12 Q. Is this report of the type that NSSF  
13 regularly published while you worked there?

14 A. One of many. We had several IIRs,  
15 Industry Intelligence Reports, on several different  
16 topics. We had one on hunting licenses and how  
17 much it costs to hunt in each state. One on  
18 sporting clays and clay sports. One on safety,  
19 national safety statistics. So we had at least  
20 five or six IIRs, different topics.

21 Q. In your role at NSSF were you responsible  
22 for overseeing the creation of IIRs?

23 A. Yes.

24 Q. And who else was involved in that process?

1           A.     Myself did most of the heavy lifting, our  
2     research associate Dianne Vrablic. And then we  
3     worked with our immediate team, particularly  
4     graphics, to make the numbers look as pretty as  
5     possible, and then also the media team to  
6     communicate the results to our members.

7           Q.     Do you have any reason to believe that you  
8     were not involved in helping create this version of  
9     this report?

10          A.     It's been four years, you know, since I've  
11     looked at a report like this. So it looks very  
12     familiar, but there's a chance it's not one I  
13     worked on. But it does look like one I worked on.

14          Q.     Can you explain why you think there's a  
15     chance you might not have worked on it?

16          A.     Well, there's -- let's see. I don't  
17     know -- 18, 19 pages and hundreds of numbers in  
18     here. So I don't remember them all.

19          Q.     Well, I'll start asking some more specific  
20     questions and maybe drill down.

21                    Could you turn to Page 7 of the report  
22     which has the stamp NSSF 23?

23          A.     Got it.

24          Q.     I'd like to direct your attention to the



1 top half of the page under the heading Modern  
2 Sporting Rifle Production Plus Imports Less  
3 Exports, 1990 through 2018.

4 Do you see that?

5 A. Yes.

6 Q. So this chart has information up through  
7 data year 2018, correct?

8 A. Correct.

9 Q. And that was within the period of time  
10 that you were still at NSSF overseeing the creation  
11 of these reports, right?

12 A. Correct, yeah.

13 Q. So it makes sense if you were the one who  
14 was responsible for assembling this data and  
15 putting it in the report, right?

16 A. There's a good chance.

17 Q. Is there anybody else at NSSF who would  
18 have done that instead of you?

19 A. Potentially Salam or Dianne after I left  
20 if they had used the same data. I'm not sure what  
21 the update schedule would have been on this report.  
22 We had so many reports that not all of them got  
23 updated on an annual basis.

24 Q. Do you recognize this chart?

1 A. I do.

2 Q. What does it show?

3 A. This is a chart that shows between 1990  
4 and 2018 on an annual basis the number of U.S.  
5 produced modern sporting rifles minus exports, as  
6 well as U.S. imported modern sporting rifles less  
7 exports.

8 Q. Were you involved in creating this chart?

9 A. I was or one like it. Again, all  
10 questions pertaining to this report, you know, have  
11 that caveat that may have been done by somebody  
12 else.

13 Q. Could you briefly flip to the very last  
14 page which is stamped NSSF 34?

15 A. Okay.

16 Q. Do you see the copyright mark at the  
17 bottom that says copyright 2020 National Sports  
18 Shooting Foundation, Inc.?

19 A. Correct.

20 Q. Does that indicate to you that the report  
21 was prepared in 2020?

22 A. There's a good chance unless it wasn't  
23 updated which would slip by potentially on occasion  
24 that we didn't update the copyright.

1 Q. And you were with NSSF until 2021,  
2 correct?

3 A. January of 2021, correct.

4 Q. So if this was issued in 2020, it would  
5 have been under your oversight; is that fair?

6 A. Yes. If this report was, it would have  
7 been under my oversight.

8 Q. Okay. I'll ask you now to turn back, if  
9 you're not already there, to NSSF 23, and the chart  
10 on the top half of the page.

11 Are you familiar with the underlying data  
12 sources and methodologies that NSSF used to create  
13 these types of charts?

14 A. Yes. I was the originator of that.

15 Q. Okay. The heading on this page uses the  
16 phrase modern sporting rifle, correct?

17 A. Yes.

18 Q. As used here does that term have the same  
19 meaning you described earlier in your testimony?

20 A. Correct.

21 Q. So to summarize, as used here, the term  
22 modern sporting rifle would exclude all pistols and  
23 shotguns, for example?

24 A. The vast majority of them. Like I said,

1 maybe one had slipped in there, I did not look for  
2 them, but a manufacturer that made modern sporting  
3 rifles. And I checked their website. I didn't see  
4 any AR pistols or shotgun MSRs. Not saying that a  
5 small number didn't slip in here, but if it did it  
6 would be very, very small.

7 Q. Do you see at the bottom of the page where  
8 it says, source ATF AFMER, U.S. ITC, industry  
9 estimates?

10 A. Yes.

11 Q. Can you explain what that means?

12 A. Sure. We like to, you know, provide as  
13 many sources throughout our documents as possible  
14 so if a member is reading those they know where  
15 that information came from.

16 The first source ATF AFMER stands for the  
17 Alcohol Tobacco -- Bureau of Alcohol Tobacco  
18 Firearms, Annual Firearm Manufacturing and Export  
19 Report.

20 The second source for information on this  
21 page was the United States International Trade  
22 Commission listed as U.S. ITC.

23 And the third is industry estimates, and  
24 that's kind of my knowledge as well as -- at the

1 time of creating this my president was Steve  
2 Sanetti at the time when I first created this. And  
3 I picked his brain on helping start the original  
4 graph or original chart.

5 Q. Does this language -- it says source, and  
6 it identifies those sources.

7 Does that correspond to both of the charts  
8 that appear on this page or just to one of them?

9 A. I believe to both. I'm not a hundred  
10 percent confident at this time. It's been several  
11 years as I stated.

12 Q. Were you the person with the  
13 responsibility of identifying those sources for the  
14 purposes of this report?

15 A. For both charts on the page or --

16 Q. Well, let me phrase it differently.

17 A. Sure.

18 Q. In terms of literally just typing out what  
19 are the sources for that information, was that your  
20 responsibility or someone else's?

21 A. Primarily would have been my  
22 responsibility.

23 Q. Okay. Can you explain more what is meant  
24 by the phrase industry estimates?

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

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

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

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

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

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

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

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

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

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

1 it?

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

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

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

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



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

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

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

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

24 There's a handful of companies that

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

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

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

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

22 BY MR. HAZINSKI:

23 Q. Well, help me understand.

24 So were you individually -- you were

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

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

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

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

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

12 A. Sure. Remington.

13 Q. You mentioned it.

14 A. No problem.

15 Q. Thank you.

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

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

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

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

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

17   BY MR. HAZINSKI:

18          Q.    Please.

19          A.    Okay.  So -- and I'll answer in a way --  
20   you can tell me if I'm answering correctly, but I  
21   believe you were asking if about 25 of the 30 only  
22   made modern sporting rifles.  You know, it's been a  
23   lots of years.

24                So ballpark, the majority of them I didn't

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

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

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

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

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

1 didn't.

2 Q. I apologize if you already answered this  
3 and I missed it.

4 You said there's a list of approximately  
5 30 companies whose manufacturing data contributed  
6 to this chart. How did you settle on that  
7 particular list of 30 companies?

8 A. Sure. So the AFMER data has every U.S.  
9 manufacturer. I'm guessing it's over a hundred.  
10 And, you know, I would just look through that one  
11 line at a time and check them off, you know,  
12 whether, okay, they don't produce MSRs or they do  
13 produce MSRs. Unsure, do further analysis on it,  
14 and then fill in the holes there that way.

15 I got a little off track. Is that what  
16 you were looking for?

17 Q. Well, there were more than 30 companies  
18 listed in total, correct?

19 A. Correct.

20 Q. So what was your process for paring that  
21 down to a list of about 30?

22 A. Right. So, again, going through that  
23 AFMER data line by line, I would just analyze each  
24 company. If they didn't produce any modern

1 sporting rifles, cross them off. If they did, look  
2 at that number, confirm that out of that number all  
3 or a percentage of those were modern sporting  
4 rifles. And when I was confident I had the correct  
5 number, I would plug it into that Excel spreadsheet  
6 for the aggregated data.

7 Q. The figure in the charts that's on the  
8 bottom right that says 19,797,000, what does that  
9 number reflect?

10 A. That should be the total of all U.S.  
11 produced and imported modern sporting rifles less  
12 exports from 1990 through 2018.

13 Q. Does this -- does that number correspond  
14 to NSSF's estimate of how many modern sporting  
15 rifles were owned in the United States?

16 A. Well, this particular number is a  
17 production number. I don't know what NSSF's  
18 current number of MSRs are.

19 Q. But at the time it was issued was it  
20 NSSF's estimate of the number of MSRs owned in the  
21 U.S.?

22 A. It was an estimate. This particular --  
23 that 19 million 797 million was the number of MSRs  
24 produced or imported within that time period.

1 Q. You can't tell from this data, for  
2 example, whether any of these modern sporting  
3 rifles were owned outside of the U.S., for example?

4 A. You know, when I created the report, the  
5 assumption was a vast majority of them were for the  
6 U.S. civilian market.

7 Thinking now hypothetically could somebody  
8 have bought one in the U.S. and transferred it out  
9 of state or out of the country, I don't know. I'm  
10 not -- I don't know the rules and regulations of  
11 what you can and can't do.

12 Q. And you said for the civilian market.

13 Did your data disaggregate ownership by  
14 civilians versus ownership, for example, by law  
15 enforcement organizations?

16 A. I believe, you know, the AFMER data when a  
17 company -- a U.S. manufacturer would produce that,  
18 it was strictly for -- it wasn't for military  
19 purposes. So civilian or law enforcement and a law  
20 enforcement officer could use that firearm for both  
21 job and for personal use or the same firearm.

22 Q. So to be clear. Your understanding is  
23 that the AFMER data did not reflect any  
24 manufacturing for military use, but it would



1 encompass manufacturing for use, for example, by  
2 police departments or sheriff's offices or similar  
3 law enforcement agencies?

4 A. Correct, yeah. We knew that, you know,  
5 out of that 19,700,000 estimate that those were not  
6 used for military purposes. Right.

7 Q. Do you have any way of estimating out of  
8 this approximately 20 million number what  
9 proportion of those belonged to law enforcement  
10 agencies?

11 A. As I'm sitting here now, obviously I'm  
12 gonna have to go off recollection because it's been  
13 four, five years, but we would have several  
14 different points of data, right?

15 And what you could do to get an estimate  
16 of something like that, we'd take this 19.7  
17 million, go to another data source, for example,  
18 that modern sporting rifle consumer study where we  
19 asked a series of questions to owners of modern  
20 sporting rifles. And one of those questions I  
21 believe had to do with are you law enforcement as  
22 well.

23 So I'm sure we could apply a percentage to  
24 find out how many people that own these are law

1 enforcement. And then, again, the assumption is  
2 that law enforcement can own that firearm for as  
3 strictly law enforcement purposes or can they use  
4 that firearm for civilian purposes as well. I  
5 don't think we ever delved into that detail.

6 Q. As far as you know, did NSSF ever do that  
7 analysis to determine the proportion of the total  
8 MSR figure that is owned by law enforcement?

9 A. I don't recall. It might have been  
10 something somebody asked, and just because it came  
11 to mind that modern sporting rifle one, it could  
12 have been a simple formula, 19.7 million times  
13 whatever that number was, here's a ballpark. But,  
14 you know, it was something that -- it wasn't any  
15 detailed analysis or a special report that I  
16 recall.

17 Q. I want to direct you now to the magazine  
18 chart on the bottom of this page. Are you  
19 generally familiar with this chart?

20 A. Yes. It's a report that I originally  
21 created as well.

22 Q. What does it show?

23 A. So the title of it, NSSF Magazine Chart  
24 estimated 304 million detachable pistol and rifle

1 magazines in U.S. consumer possession 1990 through  
2 2018. So it's got really five bar charts that make  
3 up a total number.

4 So there's two charts for pistol magazines  
5 that one is for 10 rounds or less. The other  
6 pistol magazines that hold 11 or more rounds. And  
7 then there's three charts for magazine rifles  
8 broken down by 10 or less, 11 to 29, and 30 plus.  
9 And then the last is just a total of all five of  
10 them.

11 Q. In general terms what was the methodology  
12 you used to create this chart?

13 A. Again, this was something that was asked  
14 from our members, how many magazines are out there.  
15 Never been done before. There wasn't -- we didn't  
16 have sales data, you know, very specific sales data  
17 like they do in other industries, apparel or  
18 grocery stores, where you can find out how many  
19 cans of peas were sold yesterday, right? And have  
20 an exact number.

21 We didn't have a retail sales platform for  
22 the outdoor industry. So the best way we could do  
23 this was to use similar data like the production  
24 charts from the AFMER and the U.S. ITC.

1           And again I'd talk to Steve Sanetti about,  
2     you know, what are good breakdowns for these, and  
3     we came up with those five different categories.  
4     And then we applied whatever data we had on hand  
5     that we felt was the most reliable, a number, and  
6     calculated them out, and then felt comfortable  
7     enough to provide it to our members as, you know, a  
8     starting point for people to have an understanding  
9     of what the size of the magazine market was like.

10          Q.     Similar to my question about the chart on  
11     the top of the page, were you able to estimate what  
12     proportion of the magazines produced or owned by  
13     law enforcement agencies as opposed to civilians?

14          A.     No.    It wasn't something that we were  
15     asked about I don't think on enough basis to break  
16     that out.

17                 But, again, going back to how I described  
18     how I would now look at doing that, I would say,  
19     okay, whatever the case was, 304 million, it would  
20     be different than what I described before because  
21     that was specific to modern sporting rifles where  
22     this is now all encompassing of every firearm that  
23     is able to accept a detachable magazine.    And that  
24     includes your Ruger 10/22s.

1 Now, does a law enforcement own a  
2 Ruger 10/22, I can guarantee they do. But, you  
3 know, they're using them to hunt squirrels or shoot  
4 tin cans with, right?

5 So I don't know how I would go about  
6 figuring that out at this point.

7 Q. Having discussed the data on this page  
8 with me today and spent some time with it, do you  
9 have any specific reason to believe that someone  
10 other than you oversaw or was responsible for  
11 putting together this part of the report?

12 A. No. This was, you know, a  
13 report that -- or this magazine chart was  
14 something, you know, myself was a lead on, and  
15 folks like Steve Sanetti helped. And again, you  
16 know, with that caveat that I'm not sure if this  
17 report was a hundred percent me, but it looks very  
18 much like a report that I had created, yeah.

19 MR. HAZINSKI: I want to show you the next  
20 exhibit which will be Number 2.

21 (WHEREUPON, Curcuruto Deposition  
22 Exhibit No. 2 was marked for  
23 identification.)  
24

1 BY MR. HAZINSKI:

2 Q. This resembles the document we just looked  
3 at in Exhibit 1.

4 A. Okay.

5 Q. Have you seen this one before?

6 A. Give me a minute to just look through it.

7 Q. Of course.

8 A. Okay. So your question was have I seen  
9 this report before?

10 Q. That's the question.

11 A. The answer is I'm not sure because this  
12 was seemingly produced after my tenure at NSSF.  
13 However, I'm still a member of NSSF, and I have  
14 access to the research. And on occasion over the  
15 last four years I would go in and -- if I needed a  
16 question answered, I'd like through NSSF research.

17 I don't know if I've ever seen this  
18 particular report before, though.

19 Q. You didn't specifically review this  
20 document in preparation for your deposition today,  
21 correct?

22 A. Correct.

23 Q. Would it be fair to say that this is a  
24 2023 version of the Industry Intelligence Report we

1 were just looking at?

2 And I would direct you, if it's easier, to  
3 the title page where it says 2023 Edition.

4 A. Yes, it does look like that. It looks  
5 like it's got at least three more years worth of  
6 data from the original document that we talked  
7 about earlier.

8 Q. Did you participate in creating this  
9 updated version of this report?

10 A. I don't believe so.

11 Q. Do you --

12 A. Since I left in January of '21, it looks  
13 like this report came out well after that.

14 Q. So since you were not at NSSF, do you have  
15 any personal knowledge of the methodology used to  
16 create this specific version of the report?

17 A. I do not.

18 Q. The previous version of the report had a  
19 date of 2020. This has a date of 2023.

20 Other than the Industry Intelligence  
21 Reports created in those years, did you work on any  
22 other versions of this Industry Intelligence  
23 Report?

24 A. So prior to 2020?

1 Q. Prior to 2020 or between 2020 and 2023.

2 A. It would have been, if anything, prior to  
3 2020, not after 2020 because I left in January of  
4 2021. So prior to it I'm sure I had worked on  
5 other iterations of this firearm production in the  
6 U.S. report.

7 Q. All right. Could you please turn to  
8 Page 7 of the 2023 version? And that will be at  
9 Bates stamp NSSF 41.

10 A. Okay.

11 Q. Do you recognize this chart as similar to  
12 the one we were looking at on Page 7 of the prior  
13 exhibit?

14 A. It does look similar.

15 Q. Different data years?

16 A. Correct.

17 Q. The sources at the bottom say, source  
18 ATF AFMER, U.S. ITC, industry reporting.

19 Do you see that?

20 A. I do.

21 Q. Do you recall that in the previous version  
22 that was phrased as industry estimates?

23 A. Yep. I actually have them both open, and  
24 that's -- yeah, industry reporting versus industry



1 estimates.

2 Q. Do you have any personal knowledge as to  
3 why that was changed in this version of the report?

4 A. I hadn't prior to a couple -- yesterday  
5 when I read through the deposition of Salam. And I  
6 did notice that there was a line of questioning  
7 regarding the difference between reporting and  
8 estimates.

9 Q. Do you believe the term that you used,  
10 industry estimates, was inaccurate?

11 A. No.

12 Q. The magazine chart is not present on this  
13 page either, right?

14 A. Correct.

15 Q. Do you have any personal knowledge about  
16 why it was not included in the 2023 version of the  
17 report?

18 A. It being the magazine chart, I do not.

19 Q. Do you personally know whether NSSF  
20 currently stands by your magazine estimates?

21 A. I don't know personally if they stand by  
22 what I had originally developed, but I did see they  
23 came out with an updated report maybe about a month  
24 or so ago.

1 MR. HAZINSKI: So we can set these two exhibits  
2 to the side for a moment. I'll hand out another.  
3 This will be Number 3.

4 (WHEREUPON, Curcuruto Deposition  
5 Exhibit No. 3 was marked for  
6 identification.)

7 BY MR. HAZINSKI:

8 Q. For the record this is a printout of a  
9 document that was produced in an Excel format with  
10 the Bates stamp NSSF 2351, this printout including  
11 only the Columns A through AI of that spreadsheet.

12 A. Okay.

13 Q. Apologies, A through AF of the  
14 spreadsheet.

15 Mr. Curcuruto, have you seen this  
16 spreadsheet or a version of this spreadsheet  
17 before?

18 A. I don't believe I've seen this exact  
19 version the way you have it laid out in front of me  
20 with a lot of blanks in it, but it's similar to a  
21 document I originally created at NSSF probably  
22 ten years ago.

23 Q. And what was the nature of that document  
24 that you created?

1           A.     This actually helped me develop that  
2     number for the amount of modern sporting rifles in  
3     the United States, and this is from the AFMER data  
4     primarily.

5           Q.     To prepare for your deposition today did  
6     you review that document or any version of that  
7     document?

8           A.     Such as this?

9           Q.     Such as this spreadsheet?

10          A.     I did not. Bringing back memories. I  
11     haven't seen it in a while.

12          Q.     And you were the person who created an  
13     earlier version of this document in the first  
14     instance?

15          A.     Yeah, created a one that looks a lot like  
16     this.

17          Q.     So I'll represent to you that this is data  
18     corresponding to the 2023 version of the report  
19     that we looked at in Exhibit 2.

20                 You testified that this sheet reflects  
21     information gathered from AFMER?

22          A.     Correct. Yeah, AFMER reports. That's  
23     what it looks like for me, yeah.

24          Q.     You mentioned it looked different because

1 of blanks. What did you mean by that?

2 A. For example, Column A is blank. So the  
3 one that I created, obviously I had more  
4 information in there so I knew what I was looking  
5 at.

6 Q. What kind of information was in there?

7 A. Column A to the best of my recollection  
8 would have been the name of the U.S. manufacturer.

9 Q. Okay. And each row would correspond to a  
10 different manufacturer?

11 A. Correct.

12 Q. When you testified earlier about the AFMER  
13 data, we discussed at times communications you had  
14 with manufacturers to adjust the rifle production  
15 estimates because they don't correspond exactly to  
16 the modern sporting rifle category.

17 Do you recall that?

18 A. It may -- yeah, it was to get more  
19 specific response to have more accurate data to  
20 plug into a chart similar to this just specific to  
21 modern sporting rifles.

22 Q. Because for some manufacturers if you just  
23 reported the AFMER data in the rifle category, that  
24 could result in an overcount of MSRs, right?

1 A. Correct. Very good.

2 Q. I'm learning.

3 So I'll direct you to a specific cell,  
4 Column AB, Row 23. Let me know when you're there.

5 A. I believe it says 108.

6 Q. 108,000, right.

7 A. Okay.

8 Q. That 108,000 figure reflects your  
9 determination or -- strike that.

10 The 108,000 number reflects that the  
11 manufacturer of Row 23 produced 108,000 modern  
12 sporting rifles for the year 2016, correct?

13 A. What we considered modern sporting rifles  
14 through that AFMER data, it was either the rifle  
15 category or the miscellaneous category as well.

16 Q. Okay. So I'd like you to turn to the  
17 fourth page of this document. They're not  
18 numbered.

19 A. Okay.

20 Q. But if you count -- apologies, not, to the  
21 fourth page, but to the seventh page. I apologize.

22 A. I think I'm following you.

23 Is it Cell AC 23?

24 Q. It's AB 23. But it's at the very top of

1 that page and maybe hidden under the staple in the  
2 document a little.

3 A. Okay.

4 Q. So if you pull back the document, you see  
5 where it says Cell AB 23?

6 A. Correct.

7 Q. So I'll represent to you that this list  
8 here corresponds to comments that were --

9 A. Sure.

10 Q. -- added to the Excel boxes.

11 Do you recall whether you or your  
12 colleagues at NSSF used the comment function in  
13 Excel to record any information for this  
14 spreadsheet?

15 A. Making me go back in time, but yeah. To  
16 the best of my recollection I would have utilized  
17 the comment section there.

18 As you can see there's a lot of columns  
19 and a lot of rows. So, you know, my memory's okay,  
20 but it's not that good so I would utilize that  
21 comment section as I was filling out the report on  
22 occasion.

23 Q. The comment corresponding to Cell AB 23,  
24 says Jim Curcuruto, which is you, right?

1 A. Correct.

2 Q. And it reads, 75 percent of total

3 R -- MSR slash AK made in U.S., but not sure if all  
4 you are AK, need to contact.

5 Did I read that right so far?

6 A. Looks good.

7 Q. Then it says, 90,000 rifles plus

8 54,000 misc, M-I-S-C, equals 144,000. Going to use  
9 90K to be safe as no response from CO.

10 Did I read that right?

11 A. Correct.

12 Q. And CO means company?

13 A. The entire thing is cryptic, and  
14 apparently I wrote it. So I'm not sure. I would  
15 assume CO meant company.

16 MR. LOTHSON: Where are we?

17 MR. HAZINSKI: Very top line of the seventh  
18 page of the printout.

19 BY MR. HAZINSKI:

20 Q. The beginning of this comment refers to  
21 75 percent of the total.

22 A. Okay.

23 Q. Can you tell me what that refers to?

24 A. I can't, unfortunately, specifically tell

1 you what it refers to since it was so long ago, and  
2 there's just hundreds of, you know, I'm sure,  
3 comments along the way as I filled out this report  
4 on an annual basis. So I don't recall specifically  
5 what that would mean.

6 Q. Do you have a general understanding of at  
7 the time you were working on preparing this  
8 spreadsheet what the 75 percent estimate might have  
9 been used for?

10 A. Sure. So we talked a little bit earlier  
11 about out of that number of companies -- and I  
12 think I estimated 30 earlier which apparently is  
13 incorrect estimate because there looks to be a lot  
14 more than 30. So, again, my recollection of course  
15 is a little bit fuzzy. Sorry about that.

16 But so there's several instances as I was  
17 creating this report on an annual basis where a  
18 company, whatever number, 108, you know, thousand  
19 that was listed in AFMER. And I would not know  
20 enough information about that company, so I'd go to  
21 their product. And if I was confident it was all  
22 MSRs, I would put that 108 in there.

23 If it had a product mix that I wasn't sure  
24 of, I would then contact that company. If I got an



1 answer from that company, fill it in, feel  
2 confident about it. If I didn't get an answer from  
3 them, this comment section was kind of a  
4 placeholder until I did.

5 Q. Do you have an independent recollection as  
6 you sit here today of the of the source of the  
7 75 percent number that you noted for this cell?

8 A. For this specific one, unfortunately, I do  
9 not.

10 Q. Do you have a general understanding based  
11 on your recollection of your typical practice of  
12 where you would and how you would generate that  
13 70 -- a number like 75 percent for use in a context  
14 like this?

15 A. Going back in time as I'm sitting here  
16 today, I'll give you my best thought process. So  
17 if I went to that website, and let's say they had  
18 ten products, and seven and a half of them -- seven  
19 of them were MSRs, I'd say, okay, in my thought  
20 process I'd think about 70 percent of these are  
21 modern sporting rifles.

22 But if I wasn't convinced that that was  
23 the answer because maybe they had a hundred  
24 products, and I was like, let me call for more

1 information. That probably was the case. It could  
2 have been.

3 Q. The next part of the comment says  
4 90,000 rifles plus 54,000 misc.

5 Do you see that?

6 A. Correct.

7 Q. And rifles and misc are categories that  
8 corresponded to AFMER data, right?

9 A. Correct. I believe there's at least five  
10 categories -- columns, the handguns, the  
11 revolvers -- or the pistols, revolvers, the rifles,  
12 the shotguns, and then the misc -- and I believe it  
13 was M-I-S-C. It might have been spelled out,  
14 miscellaneous, but I think it was just M-I-S-C.  
15 And that stands for miscellaneous.

16 So some companies, like a big company,  
17 could produce, you know, a handgun, a  
18 semi-automatic handgun. They could produce a  
19 rifle. They could produce a revolver, and they  
20 could produce a shotgun. So they're filling out  
21 all columns. Most companies aren't like that.  
22 They're specific to a product line.

23 So when I would get into that situation  
24 where, well, this company produced rifles and

1 miscellaneous category, that's where I would kind  
2 of make sure I was gonna put the correct number. I  
3 didn't want to overcount anything because then I'm  
4 not putting out the best product I could, you know.

5 Q. Is it your understanding that the misc or  
6 miscellaneous category for AFMER corresponds to  
7 firearm frames and receivers?

8 A. I believe that's the case for  
9 miscellaneous. And I don't know the specific  
10 definition, but I believe the bulk of items listed  
11 under that miscellaneous are stamped blowers which  
12 is basically, you know, the part that the ATF  
13 tracks. And that'll be the part that's made into  
14 the full firearm.

15 But you don't need to stamp a barrel. You  
16 don't need to stamp the upper. You don't need to  
17 stamp the trigger. It's just that one piece.  
18 That's how ATF can then track how many firearms are  
19 produced in the U.S. through a report like this.

20 Q. According to this comment 90,000 was added  
21 to 54,000 for a total 1414,000?

22 A. Correct.

23 Q. The next part of the comment reads, going  
24 to use 90K to be safe as no response from company.

1 Can you explain what that means?

2 A. You know, for my comment, again, not a  
3 hundred percent accurate, just to the best of my  
4 recollection, right? After reviewing that website  
5 and miscellaneous category and rifles produced, my  
6 best assumption was 90,000.

7 Hadn't heard from the company as of yet,  
8 was still going to follow up. And that, you know,  
9 comment was a placeholder because I wouldn't have  
10 remembered. Who was I supposed to call? What was  
11 my thing? So this is just notes to myself, but as  
12 I'm looking at it now, a little confusing.

13 Q. If the company had responded, based on  
14 your usual practice where would their response have  
15 been documented?

16 A. 99 percent are phone calls. I did a lot  
17 of phone calls to -- John, looking at the AFMER  
18 data. I got these numbers. Can you tell me how  
19 many of the 54,000 miscellaneous were stamped  
20 blowers that were gonna be made into a final  
21 product, and can you tell me how many of the  
22 90,000 rifle categories are what we consider modern  
23 sporting rifles?

24 And they would say, sure, I think,

1 whatever, 108,000 of them. And then I plug in  
2 108,000.

3 Q. And when you say plug it in -- scratch  
4 that.

5 If you have a phone call with a  
6 manufacturer providing an estimate, do I understand  
7 you to be saying any estimates they gave you about  
8 MSR production would be recorded directly in this  
9 spreadsheet?

10 A. Correct. So I think we were talking about  
11 this AB, 23B, 108,000. So after all the  
12 discussions I had, that would have been the best  
13 number to plug into that report.

14 Q. Did you keep any separate records or  
15 documentations outside of this spreadsheet of MSR  
16 estimates that you received from manufacturers?

17 A. No. This is pretty comprehensive. This  
18 was -- I spent a lot of time with this guy over the  
19 years, my friend.

20 Q. I hope it's bringing back pleasant  
21 memories.

22 A. I like numbers. It's weird, but I enjoy  
23 looking at Excel spreadsheets.

24 Q. Would it be safe to say that if this

1 company corresponding to Row 23 in the spreadsheet  
2 had given you an MSR estimate by responding to you,  
3 it would have been recorded in this spreadsheet?

4 A. Correct, yeah. In that corresponding  
5 column, yeah.

6 Q. So in the case of this cell, the company  
7 didn't respond, but you decided to include the data  
8 in the estimates anyway, right?

9 MR. LOTHSON: Objection, misstates his  
10 testimony.

11 THE WITNESS: Correct.

12 MR. LOTHSON: Calls for speculation.

13 THE WITNESS: Yeah, according to the comment,  
14 the company hadn't responded to that estimate that  
15 I thought was 90,000. It appears, again, now that  
16 I'm looking at it, that the company did respond and  
17 gave me the 108,000. So I wouldn't have just made  
18 up a number. If I did, it would have been the  
19 90,000 for everything.

20 So I always err on the side of caution.  
21 So my estimation out of that 155,000 was 90,000.  
22 After I heard back from them, they gave me the 108.  
23 So I was close, but, you know, I'll always go low  
24 if I don't know.

1 BY MR. HAZINSKI:

2 Q. So you started with the 75 percent  
3 estimate that you generated by determining  
4 approximately how many of their firearms counted as  
5 MSRs, right?

6 MR. LOTHSON: Objection, misstates his  
7 testimony, calls for speculation.

8 THE WITNESS: Correct. Yeah, speculation or  
9 going back in time -- I think we discussed it, too,  
10 right? I would have looked at their website a lot  
11 of times. Identify I think about 75 percent of the  
12 product mix would be considered modern sporting  
13 rifle. Wait to hear from them. Hear from them.  
14 Plug it in. Didn't hear from them, make a comment.  
15 Did hear from them, fill it in. I didn't just pull  
16 numbers out of, you know, nowhere.

17 BY MR. HAZINSKI:

18 Q. And then as best as you understand based  
19 on your typical practice at the time, the 144,000  
20 total is the sum of numbers that you would have  
21 pulled from these AFMER categories directly from  
22 that company in that year?

23 A. Correct.

24 Q. But then 108,000 --

1 A. I'm sorry. I'll caveat that. As  
2 they're -- 90,000 even and 54,000 even, they're  
3 estimates. They're not exact. If you look back at  
4 AFMER data, it was probably nothing that said 90 --  
5 it might have said 90,116, so estimates.

6 Q. Rounded to the nearest thousands.  
7 And then the number that ultimately got  
8 recorded here in the original cell was 108,000,  
9 right?

10 A. Yeah, I believe 23 AB, correct.

11 Q. And that's 75 percent of 144,000, right?

12 A. I don't know. Do you have a calculator?

13 Q. I can ask you to trust me.

14 A. Okay.

15 Q. Cell AB 24, on the first page has a zero  
16 in it, and it's highlighted in yellow.

17 Do you see that?

18 A. I do.

19 Q. Do you have any personal knowledge as to  
20 why there's yellow highlighting in that cell?

21 A. I do not. You know, I highlighted a lot  
22 of different cells for a lot of different reasons.  
23 As you see, there were a lot of different comments,  
24 and since it was so long ago I couldn't tell you



1 specifically what each highlight meant.

2 Q. Was yellow highlighting a tool that you  
3 used in your own work with this spreadsheet?

4 A. I believe -- I had access to this report  
5 as well as the research associate, Dianne. I'm  
6 kind of looking for a key right now of what color  
7 coding meant, but I don't see it on here.

8 So most likely it would have been myself  
9 or Dianne that added comments or color-coded  
10 things. I even see we have different color ink,  
11 you know, reds and blacks.

12 Q. As you sit here today do you have an  
13 understanding of what the yellow highlighting means  
14 or reflects?

15 A. As I sit here today, unfortunately, I do  
16 not. As you can see, it was a pretty complex and  
17 intricate process. Well, maybe not complex, time  
18 consuming.

19 So, again, with our end goal making sure  
20 we had a product that our members could make  
21 decisions off of, that's why you see all the notes  
22 and all the boxes and all the color coordination to  
23 make sure that we were doing everything we could to  
24 produce the best product that we could.

1 Q. I'll ask you to turn back to the seventh  
2 page that we were just looking at a few moments ago  
3 to look at the comment corresponding to Cell AB 24.

4 Let me know when you get there.

5 A. AB 24, note, Jim Curcuruto, no website, no  
6 answer to call, 40,000.

7 Q. And there's a phone number there, but we  
8 won't worry about that.

9 Can you explain what this comment means?

10 A. So this -- whatever the company was -- and  
11 I'm assuming going, back in time. It looks like  
12 potentially this company in the AFMER category,  
13 whether rifles or miscellaneous, had a number  
14 40,000. There was no website to confirm what that  
15 product was, and then nobody answered my call.

16 So, again, to err on the side of caution,  
17 instead of plugging in 40,000, it looks like I just  
18 plugged in zero. Now, is there a chance that those  
19 were modern sporting rifles and I undercounted,  
20 sure. But, again, I'd rather undercount than  
21 overcount.

22 Q. Would it be fair to say that based on your  
23 understanding of your usual practice at the time,  
24 the fact that they didn't have a website prevented

1 you from estimating what proportion of that 40,000  
2 were modern sporting rifles?

3 A. Correct. It was like -- as you can see,  
4 it was kind of like a puzzle. So I'm trying to  
5 fill in all the pieces to complete the puzzle, but  
6 if I -- if a piece was unavailable, you know, I  
7 just would kind of err on the side of caution and  
8 put the zero in.

9 I don't think I -- I don't think there's  
10 AR ton of holes like that. I think it's a pretty  
11 comprehensive report or at least the most  
12 comprehensive report that's available out there  
13 using those sources that we had.

14 Q. The absence of a website that would let  
15 you actually look at the different firearms  
16 prevented you from using that data.

17 As far as you understand, is that why the  
18 number reported zero corresponding to the cell?

19 MR. LOTHSON: I'll object to the form. I think  
20 it misstates his testimony. You talked about the  
21 phone number there. Are you -- I'm confused by  
22 your question.

23 MR. HAZINSKI: Let me ask it another way.  
24

1 BY MR. HAZINSKI:

2 Q. So no data reported for this cell.  
3 There's no website. The absence of a website  
4 contributed to the fact that you weren't able to  
5 have any reportable data for that company for that  
6 year.

7 Is that a fair summary?

8 A. Yeah, so what I would do is -- there are  
9 at least three things I would look at. Personal  
10 knowledge, I know who Rock River is, right? I  
11 didn't know who this company was. Go to the  
12 website. Most of the time companies have a  
13 website. This one I couldn't find a website for.  
14 And then, you know, somehow it looks like I found a  
15 phone number, whether Google search or whatever the  
16 case may be, but nobody answered the phone.

17 So three strikes and you're out. I mean,  
18 I can only do so much. I only have a limited  
19 amount of time. As you probably saw, we developed  
20 a lot of materials for our members. So, you know,  
21 as thorough as I want to be and fill in all those  
22 zeros, I couldn't get every single piece.

23 Q. I think I understand.

24 So if you can't look at product listings

1 on a website and you don't get a response from  
2 them, then you're not in a position to make an  
3 estimate of the number of MSRs for that year?

4 A. On top of it, I didn't know who that  
5 company was. For that particular company I would  
6 just err on the side of caution and put in the zero  
7 instead of the 40,000 or a different number.

8 Q. Returning to the spreadsheet which will be  
9 on the second page, could you please look at  
10 Cell AB 69?

11 A. Okay. 10,000 highlighted in yellow.

12 Q. Yeah, another one in yellow highlighting.  
13 And the figure is 10,000, right?

14 A. Correct.

15 Q. Now I'd like to flip to the comment  
16 corresponding to that. I think it's on the ninth  
17 page of the document.

18 Are you there?

19 A. I believe so, AB 68?

20 Q. 69.

21 A. Oh, okay.

22 Q. The comment for AB 69 says, Jim Curcuruto,  
23 colon, 13,340, but some bolt action.

24 Do you see that?

1 A. Correct.

2 Q. Can you explain what that comment means?

3 A. Sure. So again going back to not a  
4 hundred percent recollection, but the same process.  
5 Did I know who the company was? You know, go to  
6 their website.

7 Looks like apparently in this case I went  
8 to their website, and they had more than one type  
9 of product there, bolt action and modern sporting  
10 rifles. And assuming that 13,400 -- 340 was the  
11 number that was in the AFMER category either -- oh,  
12 it doesn't state whether it was miscellaneous or  
13 rifle. I'm assuming it was rifle since it says  
14 bolt action on it.

15 I would have wanted to apply a percentage  
16 from the website. It looks like 70 percent of them  
17 are modern sporting rifles. So either I would  
18 apply that number if I was very comfortable with  
19 that or call up the company and say, hey, 13,380,  
20 do you have a mix of products? How many of those  
21 are modern sporting rifles? Then I plug in an  
22 estimate. I believe you said it was 10,000 in this  
23 case.

24 Q. Based on your usual practice at the time,

1 do you have an understanding of how mathematically  
2 you would get from this 13,340 number to the  
3 specific number of 10,000 that's reported?

4 MR. LOTHSON: Objection, form, asked and  
5 answered.

6 THE WITNESS: So not mathematically, but most  
7 likely it was a phone call, and somebody returned  
8 that call. Out of that 13,000, about 10,000 are  
9 modern sporting rifles.

10 It's very rarely did I not get one of  
11 those three. I either knew them, website was  
12 enough information or they got back to me with an  
13 estimate.

14 BY MR. HAZINSKI:

15 Q. Other comments on this spreadsheet are  
16 written by Dianne Vrabolic, right?

17 A. Yes.

18 Q. Or Vrabolic (pronunciation).

19 A. Very good.

20 Q. Thank you.

21 A. Between Vrabolic and Curcuruto you had to  
22 practice.

23 Q. And I still made a mistake.

24 And at the time that you were working on

1 the spreadsheet she reported directly to you,  
2 correct?

3 A. Correct.

4 Q. And she collaborated with you to help  
5 prepare the overall MSR production estimates?

6 A. Yeah, over the years she had some  
7 involvement. This, as you can see, is a long one.  
8 So I handled the vast majority of the number  
9 collection, and then she would make the report look  
10 pretty, right? With our graphics team and that  
11 sort of stuff.

12 But on occasion I'd say, hey, I got ten I  
13 can't figure out. If she had the time, she would  
14 help me track down those answers. We were both  
15 puzzle makers.

16 Q. As part of your work did you have to  
17 routinely discuss the data gathering process with  
18 her?

19 A. For this particular --

20 Q. For this particular project.

21 A. -- project?

22 It's pretty self-explanatory, right? So  
23 not routinely, not much to it.

24 Q. Based on your work with her, did you have



1 an understanding about whether the methods she was  
2 using were the same as the methods you were using  
3 or different ones?

4 A. It's been so long. And, like I said, the  
5 vast majority of this was all Jim, you know. But  
6 if Dianne did help, it would probably be a  
7 follow-up to a phone call, you know. And then,  
8 hey, I got somebody and they give me an answer,  
9 type of thing. You know, like we're happy, excited  
10 to get numbers. I know, nerdy, but . . .

11 Q. You've never -- strike that.

12 Did you ever become aware or learn that  
13 Dianne Vrablic was using a significantly different  
14 methodology to collect any of the data that went  
15 into this spreadsheet than the methodology that you  
16 were using?

17 A. I don't believe so because, like I said,  
18 it wasn't very complex. And Dianne and I work  
19 closely together. So our offices were right next  
20 door. I don't see how there would be a different  
21 way to do this right now.

22 Q. So I want to ask you now more about the  
23 outreach you did to manufacturers --

24 A. Okay.

1 Q. -- when necessary.

2 You testified that in some cases you  
3 conducted that outreach in order to generate  
4 estimates of their production of modern sporting  
5 rifles, correct?

6 A. So I had a little mind -- so you had  
7 stated that I testified before that I would -- I'm  
8 sorry. Just repeat that. I had a lapse.

9 Q. Not a problem. I'm not trying to trip you  
10 up, just orient you to the topic.

11 So in some cases to get this data in an  
12 accurate form you would do the outreach to the  
13 manufacturers and request that they give you an  
14 estimate of their modern sporting rifle production  
15 for a particular year, right?

16 A. Correct. In instances where a  
17 manufacturer had a rifles category, I go to their  
18 website and say, well, Remington, you make  
19 traditional rifles like a bolt action rifle or a  
20 semiautomatic that's not AR platform, and you make  
21 an AR platform rifle. The number is X.

22 I call them up and say out of that number  
23 how many of them can we plug in as modern sporting  
24 rifles.

1 Q. And you were involved in creating  
2 production estimates not just for one year like  
3 2016, but across multiple different data years; is  
4 that fair?

5 A. Correct, yeah. I've been -- to the best  
6 of my recollection, I'm not sure what year I  
7 started this. It might have been -- let's just say  
8 2013, but I went backwards, filled in everything I  
9 could, and then, you know, went forward.

10 I don't know if we updated every year or  
11 every other year. We were very well-worked, you  
12 know, at NSSF. We had so many things that we  
13 wanted to do. Sometimes we couldn't update  
14 everything on an annual basis.

15 Q. Was it your usual practice when conducting  
16 that outreach to request information from  
17 manufacturers about their production of MSRs for  
18 each year individually or to get an overall  
19 estimate that you would apply over several years?

20 A. Since there was so few from what I recall,  
21 it would have been, you know, a handful of phone  
22 calls. And so I would have checked every year for,  
23 you know, the vast majority of them.

24 You know, again, use that Remington as an

1 example because that was one they had, you know, so  
2 many different product lines, just make the call.

3 Q. When you requested that information from  
4 the manufacturers, was it your practice to use the  
5 term modern sporting rifle or some other term?

6 A. From what I recall, the vast majority of  
7 our manufacturers were very aware of modern  
8 sporting rifles. But if I was talking to, you  
9 know, a production guy -- clarify, this is what a  
10 modern sporting rifle is, AR, AK platform.

11 And, again, you know, with a Remington,  
12 say, we're not talking about, you know, your  
13 traditional bolt action or lever action or  
14 whatever, you know. We're talking about the  
15 AR platform, so we'd clarify if I thought there was  
16 any way that they could misconstrue what we were  
17 looking for.

18 Q. And other than identifying AR or  
19 AK platform rifles, was there any other standard  
20 language that you were in the practice of using to  
21 define the category of modern sporting rifle in  
22 these conversations?

23 A. You said other than AR or AK, so the other  
24 language is modern sporting rifle.

1 Q. I see. No other terms used to define the  
2 scope that you would in your usual practice use to  
3 explain that to the manufacturers?

4 A. For this particular chart, no. I mean,  
5 like I said, when we first -- when I first got to  
6 NSSF, the term modern sporting rifle was relatively  
7 new. So it was AR, AK. There was, you know, black  
8 rifles or whatever the case may be.

9 But as -- I hate to say I was well-known,  
10 but I knew a lot of people, and they knew me. And  
11 we all kind of used the same jargon. So modern  
12 sporting rifle was a pretty common term within the  
13 group of folks that I worked with.

14 Q. Did you ever have to encourage or persuade  
15 manufacturers to participate in giving you  
16 information for this data?

17 A. For this particular data, I had very  
18 little resistance. I had a really good reputation,  
19 not tooting my own horn, but the fact was I knew a  
20 lot of people. We provided a lot of valuable  
21 information to them. So when I called for  
22 something, thankfully a lot of people returned my  
23 call.

24 MR. LOTHSON: Why don't we take a break? I

1 need to step out for a second.

2 MR. HAZINSKI: Yeah. Well, it's 12:05. Is it  
3 an appropriate time for --

4 MR. LOTHSON: You tell me. How much longer you  
5 got to go?

6 MR. HAZINSKI: There's more. We're going to  
7 take a lunch break.

8 We can go off the record.

9 (WHEREUPON, a recess was taken at  
10 12:05 p.m.)

11 MR. HAZINSKI: All right. We're going back on  
12 the record. Just a few minutes before 1:00.

13 BY MR. HAZINSKI:

14 Q. Did you have a chance to eat lunch?

15 A. I did. Thank you.

16 Q. Did you talk to anyone other than your  
17 attorneys during the break?

18 A. I did not.

19 Q. You understand that you're still under  
20 oath?

21 A. Correct.

22 Q. I have a few more questions about the  
23 estimates from the modern sporting rifle production  
24 numbers.

1           So we were discussing earlier your request  
2 to manufacturers about the number of their firearms  
3 that produced that were MSRs.

4           When you -- was it your practice when you  
5 asked manufacturers for that information to ask  
6 them about the total number of firearms they  
7 produced that were MSRs or the proportion of their  
8 firearm models that were MSRs?

9           A.    So to the best of my recollection I would  
10 have used the number that was stated in the AFMER  
11 for a given year and said out of this number how  
12 many of those would be considered the modern  
13 sporting rifle.

14           As we discussed, if somebody needed a  
15 definition, the AR, AK platform, so it would be  
16 about -- specifically about the modern sporting  
17 rifles, and a number out of that, whatever, let's  
18 just say it's a hundred thousand that's listed, how  
19 many of those would be modern sporting rifles. And  
20 then that's the number I would plug in as an  
21 estimate like, you know, a zero in everything.

22           You know, in estimate cases as you can see  
23 throughout the report, there might be a lot of  
24 zeroed ones.

1 Q. Did you have an understanding of how  
2 manufacturers arrived at those estimates typically?

3 A. It was my understanding that the  
4 manufacturer has detailed production reports on  
5 each and every model. They would go and say, okay,  
6 we consider these models modern sporting rifles.  
7 They add up to be this number. Here's that number.

8 Q. So would it be fair to say that typically  
9 your data entered into the cells in the spreadsheet  
10 we were discussing reflected specific production  
11 numbers that were given to you by the manufacturers  
12 directly?

13 A. In some cases, from what I recall, those  
14 cases where I needed to find out more information.  
15 The other cases where, for example, if it was an  
16 AR manufacturer that all they produced was ARs, and  
17 that number was 21,167, usually that's the number I  
18 plugged right in there.

19 And if it was -- you'll see some of these  
20 numbers. I think we discussed one that was, you  
21 know, the even thousand or something like that.  
22 Those were the ones where that manufacturer would  
23 have got back to me and said, oh, about a thousand  
24 of those, or something along those lines. The vast



1 majority of them were, if not perfectly accurate,  
2 you know, very accurate.

3 Q. To the best of your recollection, did  
4 manufacturers ever give you approximate estimates  
5 like 50 percent or 75 percent of their production  
6 was made up of MSRs as opposed to a particular  
7 total number?

8 A. Yeah, to the best of my recollection, you  
9 know, I think the vast majority of them were very  
10 detailed and specific numbers, but there most  
11 likely were cases where they would say, you know,  
12 approximately 75 percent of those, you know, give  
13 or take are what they would consider modern  
14 sporting rifles.

15 Q. And did -- in those cases did the  
16 manufacturers always tell you exactly how they  
17 arrived at that approximation?

18 A. From what I remember, again, long time  
19 ago, if it was something I questioned, if they said  
20 zero percent or a hundred percent, well, you know,  
21 some of them are. Some of them can't be, right?  
22 According to the product mix online. But very few  
23 instances where I had to question somebody.

24 I felt pretty confident for the most part

1 that an answer I got made sense to me, and I didn't  
2 need to bug them further about specifics.

3 Q. I want to direct you back to the  
4 spreadsheet, Exhibit 3, with one more question on  
5 the first page.

6 Do you see the block of cells highlighted  
7 in orange corresponding to the years 1995 to 2004?

8 A. Correct.

9 Q. Do you have an understanding of why those  
10 cells are highlighted?

11 A. Well, first of all, I think you said '94  
12 to '04, but I think it's highlighted '95 to '04,  
13 the ones I'm looking at here.

14 Q. You're right. Thank you.

15 A. And just not a hundred percent sure, but  
16 it would make sense -- and I don't know why only a  
17 certain block of them are. But that time period  
18 other than the 94 kind of corresponds with the  
19 assault weapons ban.

20 Q. Are you referring to the federal assault  
21 weapons ban?

22 A. Yeah, so it is that ten-year time period.  
23 But, again, looking at the chart, I don't know why  
24 just however many rows are blocked out in that.

1 Q. Did you ever -- strike that.

2 In situations where you were seeking  
3 specific information from manufacturers about MSR  
4 production, did you ever form an opinion that the  
5 estimate they gave you, the number of MSRs that  
6 they produced was not accurate?

7 A. Not to my recollection. Like I said, vast  
8 majority of them made sense. There might have been  
9 an instant or two where somebody said, oh, well,  
10 all the things that we produce are MSRs. And I  
11 said, well, looking at your website that's not the  
12 case. But very rarely, you know, would that  
13 happen. And I don't really ever recall that  
14 happening. It could have happened.

15 MR. HAZINSKI: You can set this document to a  
16 side, and I'll give you another. This will be -- I  
17 think we're up to Number 4.

18 (WHEREUPON, Curcuruto Deposition  
19 Exhibit No. 4 was marked for  
20 identification.)

21 BY MR. HAZINSKI:

22 Q. You see this document is titled  
23 NSSF Report 2021 Edition Firearms Retailer Survey  
24 Report?

1 A. Correct.

2 Q. Are you familiar with what kind of  
3 document this is?

4 A. As far as what kind of document, I'm  
5 familiar that this is a product very similar to a  
6 product that I had oversaw for several years at  
7 NSSF. I don't know if it was this particular  
8 version that I had oversight on but similar ones.

9 Q. You mentioned reviewing -- I believe you  
10 mentioned reviewing a firearms retailer survey  
11 report in preparation for your deposition; is that  
12 right?

13 A. So yesterday we briefly touched on this  
14 one, but not in any detail or not this particular  
15 one, one that looked like this.

16 Q. For the 2021 edition of this -- well, let  
17 me take a step back.

18 Can you briefly describe during your work  
19 at NSSF the purpose of this kind of report?

20 A. Sure. So NSSF being a trade association  
21 for the firearms industry, they were a member-based  
22 organization. At one point they had approximately  
23 10,000 members. A large percentage of those  
24 members were firearm retailers which are the people

1 that sell the guns and ammo and all the things that  
2 go in and around a firearm or hunting and the  
3 shooting sports.

4 So in an effort to provide resources to a  
5 big chunk of our membership, we would produce  
6 reports such as this firearm retailer report. And  
7 it was a survey of firearm retailers. We'd  
8 aggregate their responses, put it in this report,  
9 and then provide it to our membership.

10 I believe anybody that took the survey got  
11 a complete response back. And then, you know, I  
12 think we sold it to different levels of membership.  
13 Some people got it for free. Some people might  
14 have been be a 50-dollar or a-hundred-dollar price  
15 on it just to generate a little revenue internally.

16 Q. Do you recall if you were specifically  
17 involved in any aspect of the preparation of the  
18 2021 edition of this report?

19 A. Going back, I'll say potentially I was.  
20 Because if they fielded this in 2021 and calling it  
21 the '21, then I wouldn't have been directly  
22 involved in it. I can check.

23 Sometimes they would put when it was  
24 actually fielded, but, you know, the date on the

1 back corner of the -- item number on the bottom  
2 right, it says 3-21. That's how we kind of coded  
3 it, March '21. So that would have been after the  
4 fact after I left. So more than likely I did not,  
5 you know, oversee this particular report.

6 Q. Could you turn to Page 1 that has the  
7 stamp NSSF 56, please?

8 A. I've got 55 and 57. You shorted me.

9 Q. I'll pass you my copy here.

10 MR. LOTHSON: I object to this exhibit.

11 THE WITNESS: Yeah, I got odd numbers.

12 MR. HAZINSKI: Printer error I suppose.

13 BY MR. HAZINSKI:

14 Q. Can you see there a Number 56?

15 A. Okay.

16 Q. If you review the section under the term  
17 overview, does that give you any indication of when  
18 it was fielded?

19 A. I'll read this. Overview of the report is  
20 the result of an in-depth analysis of U.S. firearm  
21 retailer industry sponsored by the National  
22 Shooting Sports Foundation. The information for  
23 this report was collected in an online survey  
24 retailers conducted February through March 2020.

1 The survey response is 313 retail establishments  
2 across all the states.

3 So if this indeed was fielded in 2020, the  
4 data -- I don't know why it would have taken so  
5 long, March 2021, to get out. But potentially then  
6 I did oversee this one because I was still  
7 at -- employed at NSSF during the time of this one  
8 here.

9 Q. Do you think it would be fair to say you  
10 may have been involved during an earlier stage of  
11 the data-gathering process, but not necessarily as  
12 it was finalized?

13 A. Looking back, yeah. I don't recall if,  
14 you know, I was around when the final version went  
15 to print. Just looking at the March 21st date, if  
16 that's when this went to -- was sent out to  
17 everybody, then I wouldn't have been involved with  
18 the final, final product. But it appears as though  
19 I would have been involved in the development of  
20 it, maybe just not the final product.

21 Q. The portion that you read on Page 56,  
22 internal Page 1, said that the survey responses  
23 came from 313 retailers; is that right?

24 A. Correct. You want to share this one?

1 Q. That's all right.

2 Do you know how many total firearm  
3 retailers existed in the United States at the time  
4 this survey was fielded?

5 A. I don't recall how many were in existence  
6 at the time when this one was studied. I know  
7 ballpark 60-ish, 70 percent of our membership was  
8 made up of firearm retailers, maybe that number.  
9 So we felt like our membership was, I guess you  
10 would say, the cream of the crop on what -- the  
11 number of retailers that were out there.

12 There's a lot of FFLs that are mom-and-pop  
13 shops that just -- we call them basement folks that  
14 might have just been an individual that didn't have  
15 a brick and mortar store, but we were more focused  
16 on learning about the larger  
17 manufacturers -- larger retailers when it came to a  
18 report like this.

19 Q. Are you aware of any steps that were taken  
20 to ensure that the set of 313 respondents was a  
21 statistically sufficient sample size for reliable  
22 analysis?

23 A. You know, again, we talked a little bit  
24 about going back to my recollection of that 95 and



1 5 percent confident level. If our sample was, for  
2 example, we had 5,000 NSSF members that were  
3 retailers and we sent this out to them, we would  
4 have plugged that 5,000 into the online formula.  
5 We want a 95, 5. And it would have spit out a  
6 number saying, okay, you need 300 responses to get  
7 that 95, 5.

8 I don't see anywhere in this report where  
9 we have that confidence level, so -- and,  
10 unfortunately, I'm not sure what the margin of  
11 error and confidence level is in this one.

12 (Reporter clarification.)

13 BY MR. HAZINSKI:

14 Q. Would you agree as a general proposition  
15 that the number of survey respondents that you  
16 would need to reach that confidence level and  
17 margin of error would be larger if the total number  
18 of retailers was 50,000 rather than 5,000?

19 MR. LOTHSON: Objection, incomplete  
20 hypothetical.

21 THE WITNESS: Yeah, to the best of my  
22 knowledge, again, plugging in that formula,  
23 the -- I think it was harder to get to a higher  
24 confidence level with a lower number of sample that

1 you had.

2 So, for example, if you only had a hundred  
3 or ten people that you were gonna send the survey  
4 to, you'd need, you know, nine out of ten of them,  
5 for example, to get a high confidence level.

6 If you had a thousand, you wouldn't need  
7 that same nine hundred, that same percentage. But,  
8 again, that's just off the top of my head. I have  
9 to go back and look at that formula that we used.

10 BY MR. HAZINSKI:

11 Q. In conducting surveys of retailers how did  
12 NSSF typically promote those surveys to garner  
13 responses?

14 A. Sure. So we had obviously a very good  
15 name recognition with NSSF. They're already most  
16 likely member paying -- member dues paying folks  
17 that were getting the survey. We also had some  
18 probably lapsed retailers still in our database  
19 that still got the survey.

20 But the incentive was if you filled it  
21 out, you got a free copy of the full report. So  
22 you would know your individual responses to a  
23 question, and then you get to see the aggregate of  
24 313. So pretty valuable, right? Resource to a

1 firearm retailer.

2 And then on occasion we would also  
3 incentivize surveys to hopefully increase response,  
4 and that could be a chance to win an optic or  
5 something along the lines there. That's pretty  
6 standard procedure.

7 Q. Aside from soliciting responses from  
8 NSSF's own members, did -- are you aware of any  
9 efforts that NSSF typically engaged in to solicit  
10 survey responses from other groups or other lists  
11 of contacts?

12 A. For this particular one, I'm not aware of  
13 that. I believe we strictly focused on our own  
14 database. That's from what I recall.

15 Q. Would you agree that that method of  
16 contacting potential survey respondents would be  
17 likely to result in a disproportionate number of  
18 respondents who were already members of NSSF?

19 A. Run that by me one more time.

20 Q. NSSF promoted this survey to its own  
21 membership primarily.

22 Is that what your testimony is today?

23 A. Correct.

24 Q. You agree that that way of promoting the

1 survey means that the survey respondents will be  
2 disproportionately NSSF members as opposed to the  
3 proportion of retailers that are NSSF members in  
4 the population as a whole?

5 MR. LOTHSON: Objection, form argumentative.

6 THE WITNESS: Sure.

7 MR. LOTHSON: Go ahead if you know.

8 THE WITNESS: So I think I get what you're  
9 saying. So basically, again, we realize that our  
10 members were the cream of the crop retailers,  
11 right? Those are the ones we want to get responses  
12 from. We didn't want to get a response from one  
13 guy that has an FFL that, you know, doesn't really  
14 do e-commerce, right? They might have it for their  
15 own personal reasons or for their friends to  
16 transfer firearms, but that's not the person that  
17 we wanted to respond to this survey.

18 So we felt the sample that we had of our  
19 internal database was the best one to use  
20 especially because this was really a report going  
21 back to our members. So it was actually stronger  
22 to have a response from just our members or  
23 primarily our members when we're giving back the  
24 data to our members so they can match themselves up

1 to very similar retailers out there.

2 BY MR. HAZINSKI:

3 Q. Do you know whether NSSF ever did any  
4 analysis to determine what proportion of the total  
5 number of modern sporting rifle sold in the  
6 relevant time period were sold by these  
7 313 retailers in specific?

8 A. I am -- you know, I'm a little bit fuzzy  
9 on going back that far. I have no recollection  
10 that we ever tried to identify among NSSF members  
11 what percentage of all MSR sales were conducted by  
12 NSSF member retailers.

13 Q. What steps did NSSF take to ensure that  
14 the survey respondents who filled out the  
15 information used to make this report were  
16 representative of the total population of firearm  
17 retailers more broadly?

18 MR. LOTHSON: Objection, form, foundation.

19 THE WITNESS: So what we tried to do -- in this  
20 project here I think we had the support of  
21 Southwick Associates to help us administer the  
22 survey.

23 And what we would do is once the responses  
24 came in, you know, we would do quality control

1 checks, both at Southwick and internally at NSSF,  
2 but we were more concerned about getting quality  
3 responses. And our members are nationwide. NSSF,  
4 you know, has members in all 50 states.

5 So we're happy with the representation of  
6 the 313 that were in this sample here. Happy  
7 enough for sure to put this product out so our  
8 retailers could make business decisions off of it.

9 BY MR. HAZINSKI:

10 Q. Are you aware of any statistical weighting  
11 that was done, W-E-I-G-H-T-I-N-G, that was done to  
12 the survey results?

13 A. Again, going back to my knowledge, when we  
14 did weight some surveys, we would typically mention  
15 that in here. I don't see any reference to  
16 weighting in this report. So for the most part  
17 there was probably not weighting for this  
18 particular study.

19 Q. Do you know how the term modern sporting  
20 rifle was defined for the purposes of this report?

21 A. I would assume, going back, that when we  
22 did identify a modern sporting rifle it would be  
23 that same terminology that we talked about before,  
24 semi-automatic rifle capable of holding a

1 detachable magazine AR, AK platform, semi-automatic  
2 one-pull trigger.

3 And, you know, it became a very common  
4 term because NSSF used it so often among our  
5 members that they understood what that was. And if  
6 there were questions -- I don't recall ever  
7 fielding too many questions, you know, what is a  
8 modern sporting rifle, but to the best of my  
9 knowledge that's how we would have identified it.

10 Q. Could you please look at Page 6 of the  
11 report which is NSSF 61?

12 A. Okay.

13 Q. Do you see that one of the data categories  
14 is AR style slash modern sporting rifles?

15 A. Correct. Yep.

16 Q. Does that indicate to you whether modern  
17 sporting rifles for the purposes of this report is  
18 a term used synonymously with AR style firearms?

19 A. Correct. We typically uses AR platform --  
20 AR, AK platform. It looks like due to the amount  
21 of space there. And I think we started doing these  
22 surveys probably back 2010 or so. So at the time  
23 we probably wanted to have as much of a definition  
24 as possible, AR, AK platform, modern sporting

1 rifles.

2 I would have -- I would recommend that  
3 moving forward they probably just could use modern  
4 sporting rifles from now on, but . . .

5 Q. Do you know whether survey respondents for  
6 the purposes of this survey were told whether to  
7 include or exclude AR style pistols, for example?

8 A. To the best of my recollection they were  
9 not told to exclude them. Again, it was not really  
10 a category that we tracked during my tenure there.  
11 Maybe toward the tail end it was a topic of  
12 discussion, but nothing that we looked at  
13 specifically in detail.

14 Q. I want to ask you now some questions about  
15 magazines and NSSF's estimates around those.

16 Could you please look again at what we  
17 marked as Exhibit 1 which was the firearm  
18 production in the United States report?

19 A. 18 or 23 or 20 or 23?

20 Q. 23, please.

21 A. Go ahead.

22 Q. If you have that, I'd ask you to look at  
23 the page marked NSSF 23, the internal Page 7 for  
24 the magazine chart?



1 A. I have it.

2 Q. Do you recall I showed you this earlier  
3 and asked about the methodology that you used for  
4 it?

5 A. Correct.

6 Q. Your conclusion based on that methodology  
7 was that there were about 300,000,000 magazines in  
8 the possession of consumers in the U.S. from 1990  
9 through 2018.

10 Is that a fair description?

11 A. Correct. From the magazine chart, yeah,  
12 looks like about 304,000,000 total, yep.

13 Q. Does that 300,000,000 number as you  
14 understand it reflect the number of magazines  
15 actually existing and possessed by consumers at the  
16 time the report was issued?

17 A. The NSSF magazine chart from how I  
18 originally -- I think we talked about the  
19 methodology or how we -- there wasn't a chart  
20 available out there. So we used the AFMER data and  
21 some other pieces to fill it in. You know, that  
22 was our initial understanding of that.

23 I think as -- we didn't have any other  
24 resources available to add to that. I know there

1 was a huge aftermarket for magazines, but that was  
2 not factored in heavily in the study that I had  
3 done.

4 Q. As a general matter, magazines once  
5 they're manufactured and sold are often used by the  
6 buyer and then likely discarded.

7 Would that be fair to say?

8 MR. LOTHSON: Objection, form, calls for  
9 speculation.

10 THE WITNESS: I don't know why anybody would  
11 throw away a perfectly good magazine, but if it  
12 malfunctioned, they're not expensive to replace.  
13 But I think they last quite sometime, so I don't  
14 see why anybody would discard them.

15 BY MR. HAZINSKI:

16 Q. As you sit here today do you believe that  
17 these data and this chart provide a reasonable  
18 approximation of the number of magazines produced  
19 for U.S. consumers within that data range?

20 A. Yeah, sitting here today I feel confident  
21 in the way -- when I conducted the research with  
22 the sources that I had available to me, I feel  
23 confident that that number was a good  
24 representation.

1           Again, we didn't want to put something out  
2 that was not reliable enough for somebody to make a  
3 decision on.

4           MR. HAZINSKI: I'm going to show you another  
5 document. This will be Exhibit 5.

6                               (WHEREUPON, Curcuruto Deposition  
7                               Exhibit No. 5 was marked for  
8                               identification.)

9 BY MR. HAZINSKI:

10           Q. This is entitled Detachable Magazine  
11 Report 1990 to 2021, correct?

12           A. Correct.

13           Q. For the record it's NSSF 1994 through  
14 1997.

15                       Was this one of the documents you reviewed  
16 in preparation for your deposition today?

17           A. I did not review it in preparation.  
18 However, I did look at it when NSSF first put it  
19 out because I had read a release about it and it  
20 piqued my curiosity.

21           Q. Did you have any involvement in the  
22 preparation of this report?

23           A. I did not.

24           Q. Do you have any personal knowledge of the

1 methodology used to prepare this report?

2 A. The only knowledge I have is from kind of  
3 the methodology that's in here. And I believe  
4 there was some discussion in the deposition that I  
5 read with Salam about this as well, but I don't  
6 remember the particulars that were in there.

7 Q. Would it be fair to say you don't -- you  
8 didn't have any hand in developing the methodology  
9 directly that was used in this report?

10 A. Correct. I did not, yeah, have any  
11 knowledge of what was produced here. This was  
12 completely done after my time.

13 Q. As you sit here today, can you from your  
14 personal knowledge vouch for the accuracy or  
15 reliability of any findings in this report?

16 A. I have not really dug too deep in it.  
17 It's not a very high -- you know, not a lot in this  
18 report. So I haven't looked at it enough to look  
19 at the methodology in detail to see how accurate or  
20 not accurate it would be in my opinion.

21 Q. Could you please turn to the third page of  
22 the document that has the NSSF 1995 stamp, please?

23 A. Okay.

24 Q. This reflects a grand total firearm

1 magazine estimate for the years 1990 through 2021  
2 of 963,772,000, correct?

3 A. Correct.

4 Q. Now, this includes three additional data  
5 years beyond the scope of the magazine chart that  
6 you prepared, right?

7 A. I believe that one was through '18. So  
8 this includes '19, '20, '21, correct? Yep, three  
9 more years.

10 Q. Do you agree that through whatever  
11 methodology NSSF used to generate these numbers it  
12 resulted in a far higher estimate of magazines than  
13 the estimate you had produced a few years earlier?

14 A. Correct, yeah. 963 versus 304 million,  
15 yep.

16 MR. HAZINSKI: Well, let's set that to the side  
17 for a moment.

18 I want to show you another document. Some  
19 of these seem to have the similar printing error,  
20 but I'm going to give you one that's formatted  
21 correctly. This will be Exhibit 6, I believe.

22 (WHEREUPON, Curcuruto Deposition  
23 Exhibit No. 6 was marked for  
24 identification.)

1 BY MR. HAZINSKI:

2 Q. Have you seen this document before?

3 A. Without reviewing it thoroughly, I believe  
4 this is a report that I produced back in  
5 approximately 2013. So I have seen it, yes.

6 Q. For the record I'll note the Bates range  
7 of this production is NSSF 5902 through 5987.

8 And this is a report called Modern  
9 Sporting Rifle Comprehensive Consumer Report 2013,  
10 correct?

11 A. Correct.

12 Q. Toward the bottom of the cover page it  
13 says Sports Marketing Surveys USA.

14 Do you see that?

15 A. I do.

16 Q. What is Sports Marketing Surveys USA?

17 A. They are a nationwide research firm based  
18 out of Florida, and we contracted them to do some  
19 work for NSSF. This is one of the projects they  
20 did for us.

21 Q. How were they selected to work on this  
22 project?

23 A. I received a lot of calls from vendors  
24 saying, oh, you know, we can help you with your

1 services. And I vetted them pretty heavily.

2 When I first started at NSSF we primarily  
3 used two sources, Responsive Management and  
4 Southwick Associates, to do the bulk of our outside  
5 work, outside contract work. But I wanted to  
6 expand the amount of companies that we worked with.

7 So Sports Marketing Surveys, you know, had  
8 reached out to me, and I vetted them and felt  
9 comfortable with their methods and history and  
10 experience. So we ended up contracting them to  
11 help us with the report like this.

12 Q. Before working on this report, did Sports  
13 Marketing Surveys work on any other reports for  
14 NSSF?

15 A. To the best of my recollection, I know  
16 they -- I believe they also conducted this report  
17 in 2010 for us. I don't know if they did any other  
18 for us. None are coming to mind. But I believe  
19 they helped us with a similar report prior to this  
20 one.

21 Q. Who at Sports Marketing Surveys was  
22 involved in creating the 2013 edition?

23 A. My two primary contacts, from what I  
24 recall, Keith Story and Neil Schwartz.

1 Q. Based on your work with Sports Marketing  
2 Surveys, did you form an opinion that Sports  
3 Marketing Surveys used a reliable methodology?

4 A. Yeah, going back ten years ago I don't  
5 believe I would have contracted them if I didn't  
6 believe that they had a good methodology and a good  
7 product.

8 Q. Since they conducted a consumer survey in  
9 2010 and were brought back to conduct one in 2013,  
10 would it be fair to say that you felt based on  
11 their work on the 2010 report that they did a high  
12 quality of work?

13 A. I believe that would have been part of my  
14 line of reasoning to bring them back a second time.  
15 Just now, you know, thinking about my work with  
16 them, I remember they were impressed with the  
17 response range that we got. I think 7,000, I just  
18 noticed, on the first time around and 21,000  
19 responses the second time around which are, you  
20 know, a pretty high number for an online survey at  
21 the time.

22 Q. When you contracted with Sports Marketing  
23 Surveys for the 2013 report, did you anticipate  
24 that they would use a substantially similar



1 methodology to the one they employed in the 2010  
2 report or a different one?

3 A. When I contracted them in '13, going back,  
4 you know, best of my recollection, I believe I  
5 would have wanted a very similar methodology so  
6 that we could have established trend data.

7 And I believe throughout this report most  
8 instances we provide trend data from here is what  
9 the response was in 2010 to a question and here's  
10 what the response was to that same question or very  
11 similar question in 2023. So that way the folks  
12 using this report, you know, primarily would be our  
13 NSSF members, could see maybe opportunities or, you  
14 know, which way the market was shifting.

15 Q. So this was the context in which NSSF  
16 published a report, but the data was gathered by an  
17 outside organization, in this case Sports Marketing  
18 Surveys.

19 In that situation -- I'm sorry. Go ahead.

20 A. No, go ahead.

21 Q. In that situation were you still  
22 responsible in your role at NSSF for making sure  
23 that the report had reliable and accurate  
24 methodology?

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

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

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

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

24                     And there were certainly instances people

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1 ever do, we would get rid of their responses  
2 entirely, wipe them out of the survey.

3           There's -- we know that the average  
4 response time would be 10 minutes, 15 minutes to  
5 take this study. And we would get responses, and  
6 you could sort them in from this guy did this  
7 survey in a minute. This guy did it in, you know,  
8 two days or something like that. So we would get  
9 rid of those people that we call speeders that are  
10 just taking that survey just to maybe potentially  
11 have a chance to win something if there was an  
12 incentive on it.

13           So I know we had -- in addition to the  
14 fail -- the gotcha questions and the speeders, we  
15 also had some things called patterning or  
16 straightlining. And so straightlining might be the  
17 answer is C, C, C, C, C. Like, you know, some kid  
18 did it in SATs in high school who didn't know how  
19 to take a test or, you know, that type of thing.  
20 So there were some fail-safes.

21           The last thing I remember that we did was  
22 looking at -- sometimes throughout a survey we had  
23 open-ended questions. Hey, John, or, you know,  
24 tell us what you think about -- what features do

1 you like the most about this, and open-ended  
2 response. So we'd read through all those  
3 open-ended responses, and, you know, if something  
4 made no sense or something like that, again, I use  
5 this gun for sporting clays purpose, you know, we  
6 would delete those.

7 So it was a painstaking process, but again  
8 we wanted to have that best product for our end  
9 user. And luckily, you know, I was never under  
10 pressure. Get stuff done. You have to have this  
11 report out by this date. Never had that pressure.  
12 So I had the luxury of taking my time going through  
13 all those steps making sure I put out the best  
14 product I could.

15 Q. Do you know whether any gotcha questions  
16 were used to assess the survey respondents in the  
17 preparation of this report?

18 A. Unfortunately, I can't recall. I know we  
19 did it in several instances. I don't know if this  
20 was one of those instances.

21 Q. Okay. How did you decide whether or not  
22 to include those types of questions?

23 A. It was, I guess, kind of standard practice  
24 to go through some of those. Certainly the

1 speeders was an easy one because that was an easy  
2 one to look at.

3 But, you know, it was brought to my  
4 attention about those gotcha questions by a vendor.  
5 I don't know if it was Sports Marketing Surveys or  
6 another vendor that introduced that to me. But I  
7 thought it was pretty cool, and I tried to include  
8 that in a lot of the stuff I did moving forward.

9 Q. In terms of weeding out surveys responses  
10 based on the time taken to complete the survey, for  
11 this report who would have been responsible for  
12 weeding out those responses, Sports Marketing  
13 Surveys or NSSF?

14 A. To the best of my recollection, again, you  
15 know, ten years ago, I've had a -- I'm very  
16 comfortable with Keith and Neil's knowledge of how  
17 to do surveys, and they would have been primarily  
18 responsible. Would I have reminded them or asked  
19 them, hey, did can you take out the speeders?  
20 Probably. But I just don't recall exactly at this  
21 time.

22 Q. As you sit here today, do you have an  
23 independent recollection of whether that strategy,  
24 taking out the speeders, was used as part of the



1 preparation of this report?

2 A. Again, I don't recall. I assume we would  
3 have done stuff like that, but I don't recall.

4 Q. For the purposes of this report, what does  
5 the phrase modern sporting rifle mean?

6 A. Well, for this report in 2013, I believe  
7 we had a pretty clear definition on the intro of  
8 this survey. So like prior to taking the survey  
9 there was a definition of it.

10 I know for the 2010 survey and I believe  
11 for the 2013 survey as well, we actually had a  
12 video introduction that explained what a modern  
13 sporting rifle was. It was me at the range, and  
14 here's an R15. This is the type of firearm we're  
15 looking for you to respond.

16 Because, again, in 2010, 2011, that term  
17 modern sporting rifle was probably not very  
18 familiar with a lot of AR, AK owners. So we wanted  
19 to make sure we explained it in very good detail so  
20 there couldn't be any misunderstandings of what we  
21 were looking for.

22 Q. Could you look at Page 5 of the report  
23 which is NSSF 15 -- excuse me, NSSF 5908, please?

24 A. I have it open.

1 Q. I want to direct your attention to a  
2 sentence in the first paragraph that says, in the  
3 2013 survey MSRs were specified as either an AR  
4 platform, AK platform or other semi-automatic rifle  
5 with a detachable magazine.

6 Did I read that correctly?

7 A. AR, AK or other semi -- okay. That looks  
8 correct.

9 Q. The definition of MSRs in this sentence,  
10 is that definition the same as or different from  
11 the definition used in the Firearm Production in  
12 The United States report that you worked on?

13 A. So the firearm production report in the  
14 U.S., you know, primarily is AR, AK platforms for  
15 the modern sporting rifles. This has or other  
16 automatic rifle with detachable magazine, which I  
17 believe was explained a little bit more in detail  
18 again in that introductory video to clarify, you  
19 know, we're looking for AR platform, AK platform.

20 But the other automatic rifle with  
21 detachable magazine is a little bit different than  
22 the standard definition we've been talking about  
23 for the previous examples.

24 MR. LOTHSON: Just for the record, it says

1 semi-automatic, not automatic.

2 THE WITNESS: Did I -- okay. If I misspoke,  
3 I'll clarify. I'll read, in the 2023 -- 2013  
4 survey, MSRs were specified as either an  
5 AR platform, AK platform or other semi-automatic  
6 rifle with a detachable magazine.

7 BY MR. HAZINSKI:

8 Q. Do you agree that this definition of MSR  
9 would exclude pistols?

10 A. At the time that we did this, and we're  
11 going back ten years, again, AR-15 pistols I don't  
12 think were prevalent at all. Certainly I don't  
13 have much recollection for them. So we didn't have  
14 much of a definition or disclaimer to include them  
15 or not exclude them.

16 Q. Do you agree that this definition of MSRs  
17 would also exclude shotguns?

18 A. Yeah, I would agree that this definition  
19 of MSRs would exclude shotguns.

20 Q. Do you know why or could you explain  
21 further why NSSF used a definition of MSR in this  
22 report that encompassed other semi-automatic rifles  
23 with a detachable magazine whereas in other reports  
24 that category was not part of the definition that

1 was given?

2 A. I'm actually trying to think of that while  
3 you were talking about that because it is a little  
4 bit different. And, you know, going back  
5 ten years and again don't know this for sure, but  
6 potentially as markets shift and new products come  
7 to market, there might have been, you know, a new  
8 category or, you know, a new rifle that may not  
9 have been exactly an AR-15 or an AR, AK.

10 So it may be an AR-10 or something like  
11 that. It could have been in that definition. But,  
12 unfortunately, I don't know specifically why we did  
13 it. I wish I did.

14 Q. During the period you worked at NSSF, was  
15 modern sporting rifle a term whose meaning shifted  
16 over time?

17 A. I believe it shifted somewhat with the  
18 advent of new products to market kind of. I had  
19 mentioned the AR-10, but primarily modern sporting  
20 rifles during my tenure there were AR, AK platform.  
21 That was the very much bulk of them.

22 Q. I want to ask you about a previous page of  
23 this document which is Page 4, NSSF 5907.

24 A. Okay.

1 Q. Do you see this page with the word  
2 methodology at the top?

3 A. Yes.

4 Q. Do you know whether the language on this  
5 page was drafted by someone at NSSF or drafted by  
6 someone at Sports Marketing Surveys?

7 A. Just give me one minute to read it.

8 Q. Take your time.

9 A. Okay. So you had asked if I knew the  
10 methodology was written by NSSF or Sports Marketing  
11 Surveys. So to the best of my recollection it's  
12 something that we both would have wrote together.  
13 You know, I was heavily involved in finding the  
14 organizations to help us place the banner ads to  
15 reach places that we thought modern sporting rifle  
16 owners would be.

17 For example, the last paragraph there, the  
18 very high level of confidence with the plus, minus  
19 0.29 percent and 0.68 percent not confidence level  
20 may have been duly created by me and the folks at  
21 Sports Marketing Surveys.

22 Q. I want to direct your attention to the  
23 part on this page in the middle paragraph that  
24 says, to further pair down response.

1 Do you see that?

2 A. Okay.

3 Q. To further pair down response to those  
4 that would correctly complete the survey, the  
5 survey's initial question asked, do you own at  
6 least one modern sporting rifle. If you do not own  
7 an MSR, but would still like to be entered into the  
8 contest, select no. These safeguards narrowed  
9 feasible responses from 26,719 to 21,942.

10 Did I read that all correctly?

11 A. Correct.

12 Q. That means that the report analyzed  
13 responses only if the respondents reported that  
14 they owned at least one MSR; is that right?

15 A. Correct. Yeah, and that was kind of  
16 another one of those safeguards. And I think this  
17 was -- again, we're going back, to my recollection,  
18 ten years ago -- something that Sports Marketing  
19 Surveys may have suggested including.

20 Because sometimes -- okay. Well, I want  
21 to -- maybe I don't own one, but I want a chance to  
22 win a \$500 gift card. So this was one of those  
23 fail-safes that allowed people to self-select and  
24 say, all right, I'll just get a chance to win that

1 rather than taking that survey providing this  
2 information that we would try to have to weed out.

3 So another -- I appreciate you bringing  
4 that up because I think it's another safeguard that  
5 make the results even stronger.

6 Q. Limiting the data in display means that  
7 all of the data generated was from responses by MSR  
8 owners or individuals who report owning MSRs rather  
9 than from a broader swath of gun owners more  
10 generally, right?

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

12 Q. Is it fair to say that this is not a  
13 survey of the overall consumer market for firearms?

14 A. This survey specifically was delving into  
15 the topic of modern sporting rifles, not all  
16 firearms. I don't know if there's some questions  
17 in here, there may be, about what other firearms do  
18 you own.

19 But the bulk of it was to determine things  
20 like, you know, ownership and usage and features  
21 and accessories and costs. And I think that's all  
22 laid out throughout the report.

23 Q. You agree that the scope of this survey is  
24 designed such that there would not be any counted

1 survey responses from individuals who chose not to  
2 buy any modern sporting rifles at all?

3 A. What we tried to do was certainly weed out  
4 anybody that didn't own a modern sporting rifle.  
5 We wanted responses from just those that at least  
6 owned one modern sporting rifle under the  
7 definition.

8 Q. So hypothetically if there were a  
9 potential survey respondent who chose not to buy  
10 any MSRs at any point in their life because, for  
11 example, they believed they weren't useful for  
12 self-defense, their responses would not be counted  
13 within these results; is that right?

14 A. Okay. So hypothetically and then you went  
15 into something about self-defense. Clarify that  
16 for me. I'm sorry.

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

19 A. Okay.

20 Q. -- who doesn't own my modern sporting  
21 rifles because, just to take an example, they don't  
22 believe that they're a good self-defense tool.

23 Are you with me so far?

24 A. Sure.



1 Q. If that person -- a person in that  
2 category, a non-MSR owner, their opinions about  
3 MSRs would not be counted among the survey results  
4 reported in this document, correct?

5 MR. LOTHSON: Objection, incomplete  
6 hypothetical.

7 THE WITNESS: So from what I understand about  
8 the question, you know, our goal for this was to  
9 have as many of these 21,942 responses come from  
10 people that owned at least one modern sporting  
11 rifle.

12 BY MR. HAZINSKI:

13 Q. And part of the purpose of this survey was  
14 to get an understanding of the purposes for which  
15 modern sporting rifles are popular; is that fair?

16 A. It was very broad ranging. Again, well,  
17 at the time we did the first one in 2011 or 2010,  
18 there was like almost no information on the modern  
19 sporting rifle consumer.

20 So we did that first one, and then they  
21 were probably becoming more popular, and that's  
22 probably why we came back and did the study again  
23 in 2013.

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

1 lot of information in here. So the purpose of  
2 doing it was to provide as much information as  
3 accurately as possible to our NSSF members so they  
4 could make that business decision.

5 For example, if they're a manufacturer  
6 that wasn't producing them and they saw this and  
7 say, oh, there's an opportunity, they, you know,  
8 might spend some resources to then have a product  
9 line developing modern sporting rifles.

10 So we didn't want one of our members, you  
11 know, spending a lot of money on something that,  
12 you know, we didn't believe putting out there  
13 because we wouldn't want them to put all their  
14 money into making these and then all of a sudden  
15 nobody buys them, right? And put them out of  
16 business. It doesn't help NSSF to lose members  
17 that way.

18 Q. I want to talk about how NSSF promoted  
19 participation in this survey.

20 A. Sure.

21 Q. On this page it says at the top, with no  
22 database available of known MSR owners,  
23 NSSF promoted participation in this study via  
24 online banner ads, on various websites, blogs and

1 e-newsletters geared towards firearm ownership and  
2 hunting, followed by a list.

3 Do you see that?

4 A. I do.

5 Q. And you were involved in the process  
6 that's described in that sentence, right?

7 A. Yes.

8 Q. The first example listed is the AR15.com  
9 e-newsletter. What is AR15.com?

10 A. So at the time -- and I'm not sure if they  
11 even still exist today, but at the time AR15.com  
12 e-newsletter was a very popular newsletter. And I  
13 don't recall how many subscribers they had, but  
14 that was a place where people would go for  
15 information on modern sporting rifles.

16 And assuming that with the name AR15.com,  
17 that looked like a really good place for us to  
18 reach MSR owners to help take our survey and build  
19 the responses so we could have a really reliable  
20 data source for our members to use.

21 Q. At the time the survey was conducted did  
22 AR15.com host forums for people to discuss MSR  
23 ownership?

24 A. To the best of my knowledge, at one point

1 I believe AR15 did have forums that discussed it.  
2 But, again, ten years ago I couldn't tell you for  
3 sure, but I do believe so.

4 Q. Do you know one way or the other whether  
5 the population that visits AR15.com is  
6 representative of the overall population of modern  
7 sporting rifle owners in terms of their opinions  
8 about those weapons?

9 MR. LOTHSON: Objection, form.

10 THE WITNESS: So one of the things that I  
11 somewhat recall, again, going back ten years, was  
12 working with Keith Story and Neil Schwartz of  
13 Sports Marketing Surveys and saying we need to have  
14 as well-rounded a sample as possible.

15 First of all, you can't go to like these  
16 big conglomerates like a Dynata, now they're called  
17 Experion, back in the day where you would, you  
18 know, say I need a thousand completes of people  
19 that have gone fishing. And they say okay. It's  
20 not a high -- a low incident rate, so \$5 a  
21 complete. It cost you \$5,000 to get it done.

22 There was -- we couldn't go to them and  
23 say give us modern sporting rifles. It wasn't a  
24 category.

1           So we had to be a little on avant garde  
2 or, you know, think out of the box. How are we  
3 gonna get this? And it can't just come from  
4 AR15.com because that is a skewed sample because  
5 that is one mind set of people that go there. Now,  
6 it's a nationwide group of people. It's not  
7 regionalized or only available in one state. I  
8 think AR15 was a nationwide website.

9           So we -- that's why we -- I think we have  
10 a list of a dozen or so. You can see the other  
11 organizations that we had there. So we felt really  
12 comfortable. And I remember Neil and Keith saying  
13 21,000 responses, I mean, it was -- they were  
14 impressed. And these guys had done surveys a lot.  
15 So that kind of helped me feel comfortable that  
16 what we were producing was a very valuable  
17 document.

18 BY MR. HAZINSKI:

19           Q. Do you know whether either Sports  
20 Marketing Surveys or NSSF conducted any statistical  
21 weighting to ensure that the survey respondents  
22 were generally representative of the overall  
23 population of MSR owners in the United States?

24           A. Not to my recollection. You know, I

1 talked about before I know on several of our  
2 surveys we had done weighting. And I tried to be  
3 very clear about when weighting was done, we put  
4 that in the methodology. I don't see it here, so I  
5 would assume that we did not weight that.

6 Q. I want to ask about another part of  
7 Page NSSF 5907. The final full paragraph says,  
8 this gives a very high confidence level. The  
9 confidence interval for the full MSR owner sample  
10 ranges from plus or minus 0.29 percentage points to  
11 plus or minus 0.68 percentage points at the  
12 95 percent confidence level.

13 Did I read that correctly?

14 A. Correct.

15 Q. So you used the term confidence level  
16 before. So you have a familiarity with that term?

17 A. Correct. And I think the next sentence or  
18 two kind of takes it a step further.

19 Q. And that provides an explanation of what  
20 the application of that concept is with an example?

21 A. Correct. And, you know, I think I talked  
22 about earlier the minimum confidence level we tried  
23 to strive for was a 95 and 5, but as you can see  
24 this was a 95 and 0.5 which is tight which means

1 it's very solid.

2 And, again, ten years ago I remember those  
3 guys being impressed, and that's what they did for  
4 a living. They're like that's pretty solid stuff.  
5 So I was happy to put this report out.

6 Q. Do you know how the confidence level and  
7 this margin of error were specifically calculated  
8 for this report?

9 A. So it either would have been that same  
10 formula -- and I had just a website. You plug in,  
11 you know, sent to whatever X amount of people. But  
12 I'm assuming under this one since I contracted out  
13 this job that Keith and Neil would have been the  
14 ones to supply that information.

15 Q. Confidence levels in statistics are  
16 determined in part by comparing the size of the  
17 sample to the size of the overall population from  
18 which that sample is taken, right?

19 A. Yeah, there's several different variations  
20 of confidence level, but that's one understanding  
21 of it. You know, there's no -- unfortunately, no  
22 survey, even the U.S. Census, you now,  
23 hundred-million-dollar surveys that are going to  
24 get you a hundred percent confidence and zero

1 margin of error, right?

2 So there's always some sort of confidence  
3 level, but pretty much across the board -- and I  
4 used to go to, you know, Quirks which is direct  
5 marketing, you know, conferences. Across the board  
6 from Google to Apple to Microsoft, 95 and 5 was a  
7 pretty standard confidence level to get.

8 Q. For the purposes of this report did either  
9 NSSF or Sports Marketing Surveys estimate the total  
10 number of modern sporting rifle owners in the  
11 United States?

12 A. Not to my recollection. We may have done  
13 so. I know we had the numbers there that we could  
14 have identified that, but I don't recall.

15 MR. LOTHSON: Why don't we take a break for a  
16 seconds?

17 MR. HAZINSKI: Sure.

18 (WHEREUPON, a short recess was  
19 taken.)

20 MR. HAZINSKI: We're back on the record. It's  
21 a few minutes shy of 2:15 p.m.

22 BY MR. HAZINSKI:

23 Q. Mr. Curcuruto, we were talking about  
24 NSSF 5907 and the 95 percent confidence level and



1 that margin of error, those figures there.

2 Do you agree that in order to assess the  
3 confidence level associated with a particular  
4 sample that you need to know or accurately estimate  
5 the size of the underlying population from which  
6 the sample is taken?

7 MR. LOTHSON: Objection, form, incomplete  
8 hypothetical.

9 THE WITNESS: Yeah, there's -- from my  
10 understanding the confidence level can be looked at  
11 a couple different ways. One, with a known  
12 quantity of, okay, we're gonna send this out to a  
13 thousand retailers or we're gonna send this out to  
14 the general population without knowing that.

15 So either way, you know, you can still  
16 form a pretty solid confidence level on either way  
17 you do that. And I believe in this case here, like  
18 I recall, the folks at Sports Marketing Surveys  
19 were impressed with how strong a confidence there  
20 was in this report.

21 BY MR. HAZINSKI:

22 Q. Did anyone at Sports Marketing Surveys in  
23 the course of the preparation of this report ever  
24 inform you that they were relying on an estimate of

1 the total number of MSR owners in the United  
2 States?

3 A. Unfortunately, I don't recall. I'm not  
4 sure how, you know, that final 95 and 0.29 was  
5 calculated.

6 Q. Hypothetically, do you agree that a sample  
7 size of 2,000 -- 21,942 would generate a different  
8 confidence interval if the underlying total  
9 population of MSR owners was 500,000 versus  
10 50,000,000?

11 MR. LOTHSON: Objection, form, compound,  
12 confusing.

13 THE WITNESS: So kind of what we talked about  
14 before, the smaller the sample size, you need a  
15 higher completeness, right? So once you get out  
16 past -- it could be 320,000,000 people that live in  
17 the United States. There's a number that  
18 doesn't -- you know, once I get to 10,000, making  
19 this up, it doesn't matter if you get to  
20 300,000,000. There's not gonna be a change in the  
21 data.

22 I've actually seen it firsthand. Because  
23 what we do is print out reports. Say after a  
24 thousand responses, here's the answers. After

1 10,000 responses, here's the answers. And there's  
2 not much fluctuation. So that's where that, you  
3 know, 0.29 comes into play. So, you know, my  
4 experience is very, very happy with this study of  
5 21,000 responses.

6 BY MR. HAZINSKI:

7 Q. Is it your opinion that the sample size of  
8 over 21,000 responses reported here is sufficiently  
9 large that no matter what the underlying total  
10 population of MSR owners is would not affect the  
11 confidence level?

12 A. So, again, to the best of my knowledge  
13 whether it was 7,000 responses in the first one,  
14 the 20,000 responses, both I felt very confident in  
15 putting a report out to our members so they could  
16 make that well-informed business decision.

17 Q. You expressed that you felt positively  
18 about the small margin of error, 0.29 percent and  
19 0.68 percent, estimated here.

20 Do you believe that those numbers could  
21 vary depending on the size of the underlying  
22 population of total MSR owners?

23 A. Kind of what -- the last answer we talked  
24 about there. It's my belief that there's not gonna

1 be that much fluctuation. Again, I've seen it  
2 firsthand several times about. Once you get to a  
3 certain number, you know, the percentages of change  
4 in that overall response is minimal.

5 Q. I'd like you to turn to the next page  
6 which is Page 5, NSSF 5908, and specifically to the  
7 third to final paragraph.

8 A. Okay.

9 Q. Begins, 35 percent reported, referring to  
10 the survey respondents, 35 percent reported having  
11 either military or law enforcement background.  
12 This is down from the 44 percent reported in 2010.  
13 Although the veteran status has increased slightly,  
14 the 2013 survey seemed to tap more into the  
15 civilian MSR population.

16 Did I read that correctly?

17 A. Correct, yes.

18 Q. What does it mean that the 2013 survey  
19 tapped more into the civilian MSR population?

20 A. So going back, you know, ten years ago, to  
21 the best of my recollection one of the questions  
22 that we wanted to ask to get a better feel for who  
23 owned modern sporting rifles was did they have  
24 military background, did they have a law

1 enforcement background.

2 We felt that was very valuable to our NSSF  
3 members to know, for example, for marketing  
4 purposes or what not. They, you know, may be able  
5 to generate different ads specific to what the  
6 average consumer looks like.

7 So I think that's an important to ask -- a  
8 question to ask there to have that knowledge of who  
9 owns the modern sporting rifles at that snapshot in  
10 time.

11 And according to that response there, it  
12 looks like there was a shift in the marketplace a  
13 little bit. So, again, if you're a marketer, you  
14 might be able to use that for better marketing  
15 purposes.

16 Q. So I'm not going to have this formulated  
17 as a very clear question, so please bear with me as  
18 I try to articulate it. I guess I want to  
19 understand what this sentence is actually saying.

20 It sounds from your last answer that you  
21 interpret this to say that this is reflecting a  
22 change in the composition of who actually owns MSRs  
23 in the market, right?

24 A. I'm gonna read it myself, sorry.

1           So from my recollection of reading it now,  
2           what I assume, you know, that we were trying to get  
3           out was this was a point, because it is in the  
4           executive summary, that stood out as important to  
5           know.

6           So as you saw, there was a lot of  
7           information within this report, but the executive  
8           summary maybe points out some of the key things to  
9           take a look at in more detail as the readers review  
10          in the report.

11          Q.     The contrast I'm trying to draw out in my  
12          question is whether this difference of 44 percent  
13          down to 35 percent as a reduction according to the  
14          findings of this survey, whether that reduction  
15          reflects, according to the findings, a change in  
16          the proportion of veteran MSR ownership or a change  
17          in survey response rates, in other words, a change  
18          in who happened to be answering the questions.

19                 Do you understand what I'm asking?

20          MR. LOTHSON:   Objection, compound, confusing.

21          THE WITNESS:   Okay.   So I'll try to answer that  
22          the best I can.   So, again, with high confidence  
23          levels, you know, both ways around, we kind of  
24          talked about how my -- I feel that it's a very

1 well-represented sample and so did Sports Marketing  
2 Surveys at the time.

3           So this particular data point, one of many  
4 within the report, stood out as we were writing  
5 this executive report, something to let the reader  
6 know about. So as I think about it now, if the  
7 report says in 2010, 44 percent of people  
8 responding had a military or law enforcement  
9 background and now three or four years later  
10 35 percent of them do, that could tell me, okay, so  
11 the market has potentially shifted to more  
12 consumers, non-law enforcement veterans that now  
13 own these.

14           So if I were to, you know, look to where  
15 to market a product, I might say, okay, I'll focus  
16 now on the growing consumer, nonmilitary,  
17 non-law enforcement background as a potential way  
18 to advertise.

19 BY MR. HAZINSKI:

20           Q. How would you know on the basis of these  
21 survey results whether the change from 44 percent  
22 to 35 percent was attributable to an actual change  
23 in market conditions as opposed to a change in  
24 survey response rates from certain groups?

1           A.     So, again, I believe with a strong  
2 confidence level in the 2010 and the 2013, it's  
3 very reasonable for myself or an NSSF member to use  
4 this data to make business decisions.

5                     And, you know, what I get from reading  
6 that there is that it looks like over the course of  
7 between 2010 and 2013, more consumers were  
8 purchasing modern sporting rifle that did not have  
9 a law enforcement or military background.

10           Q.     Are you aware of any statistical weighting  
11 techniques that were used in the preparation of  
12 this report specifically with respect to the  
13 prevalence of firearm ownership among veterans?

14           A.     Again, going back ten years, I don't  
15 recall if we put any weighting on this. As I  
16 stated before, when we typically weight, we try to  
17 put it somewhere within the report.

18                     So I don't see it, but it may be in here.  
19 But if it's not in here, we most likely did not  
20 weight.

21           Q.     At the time this report was finalized and  
22 sent to you by Sports Marketing Surveys, did you  
23 express any concerns about any of the methodologies  
24 that Sports Marketing Surveys had used?



1           A.    I don't recall doing that.  I recall being  
2   pretty darn happy with the product we created,  
3   yeah.

4           Q.    Do you recall expressing any concerns  
5   about the accuracy of any of Sports Marketing  
6   Surveys findings?

7           A.    Within this report?

8           Q.    With respect to this report.

9           A.    I mean, there's so many -- you know,  
10   because it's so comprehensive, and let's say there  
11   was dozens of questions, there may have been  
12   something that I questioned and said, hey, you  
13   know, the trend data in 2010 to '13, that doesn't  
14   make sense.  Let's look into that further.  But I  
15   can't recall if that was the case in any of these.

16          Q.    After this 2013 report was finalized, did  
17   you ever express to anyone at Sports Marketing  
18   Surveys or alternatively to anyone at NSSF that  
19   methodologies for future consumer surveys should be  
20   modified?

21          A.    To the best of my recollection, at the  
22   time I would have been very happy with everything  
23   that happened in this.  So there was probably no  
24   concerns about how we should make an immediate

1 shift to a different methodology, you know.

2 And some of our vendors used different  
3 methodologies, and, you know, everybody says their  
4 own methodology is the best. But, you know, we  
5 wanted to use this particular methodology with this  
6 survey, and we were happy with the results.

7 MR. HAZINSKI: Okay. You can set this exhibit  
8 to the side for now, please. I will distribute  
9 Exhibit 7.

10 (WHEREUPON, Curcuruto Deposition  
11 Exhibit No. 7 was marked for  
12 identification.)

13 BY MR. HAZINSKI:

14 Q. This is a document with the Bates range  
15 NSSF 100 through 180, and this is a document called  
16 Modern Sporting Rifle Consumer Comprehensive  
17 Report, correct?

18 A. Correct.

19 Q. The last -- the very last page of this  
20 document, NSSF 180, has a copyright of the year  
21 2022. Do you see that?

22 A. Correct.

23 Q. So I might call this the 2022 consumer  
24 survey --

1 A. Okay.

2 Q. -- in comparison to the 2013.

3 Do you understand when I say that?

4 A. Sure.

5 Q. Have you seen this 2022 consumer survey  
6 report before?

7 A. I recall hearing -- so I believe one of  
8 the things I worked on prior to my departure was  
9 the development of this, but I don't think it ever  
10 got in the field and certainly not the report  
11 created when I was still there.

12 And I believe after I left NSSF, I  
13 remember seeing a press release that the study was  
14 out, but I was knee deep in, you know, getting  
15 Outdoor Stewards of Conservations off the ground.  
16 So I never took a detailed look at this study  
17 unfortunately.

18 Q. Did NSSF ever issue any other versions of  
19 its consumer survey report between the years 2013  
20 and 2022?

21 A. On the modern sporting rifle?

22 Q. Right.

23 A. I don't believe so through Sports  
24 Marketing Surveys. I know, you know, throughout

1 the years we had updated that chart on the number  
2 of MSRs and probably put out bits of information  
3 here and there.

4 But I believe when I was there it only had  
5 been conducted in '10 and '13, and then I recall  
6 doing it again to have that, oh, ten years has  
7 passed by, let's see where we are type of thing.  
8 But it wasn't completed during my tenure there.

9 Q. Do you know whether Sports Marketing  
10 Surveys also conducted this report?

11 A. I believe so. I see, you know,  
12 potentially Page 2 or NSSF 101, it does have the  
13 Sports Marketing Surveys' information. So I'm  
14 assuming that that's who conducted it.

15 Q. Were you responsible for the decision to  
16 bring them on to do the 2022 version of this  
17 report?

18 A. I was responsible to bring them back to do  
19 a version -- were probably going to do it during  
20 2020, but I -- from what I recall it was delayed  
21 most likely due to COVID. Because there was crazy  
22 buying at the time, and there was like -- it  
23 wouldn't have been like a true representation of  
24 what's going on in the market. Everybody's buying

1 everything during COVID, right? Guns couldn't be  
2 kept on the shelves.

3 So I think one of the reasons why it  
4 didn't go out in 2020 while I was there was because  
5 the market was kind of crazy, and it wouldn't have  
6 been a representative snapshot in my opinion. So  
7 we delayed it. And then of course, you know, after  
8 I left is when -- it looks like it went out in  
9 potentially July of '22. This looks like the stamp  
10 on the back page.

11 Q. When you contacted Sports Marketing  
12 Surveys to conduct this updated survey, was it your  
13 intention for them to apply essentially the same  
14 methodology they used in the 2010 and 2013 reports?

15 A. Right. And so ten years had passed.  
16 Methodologies changed slightly. But from my  
17 recollection, I wanted -- you know, we had  
18 discussions or at least from my recollection we had  
19 discussions about making sure the trend analysis  
20 could be true.

21 Like even if they changed the methodology  
22 a little bit, we wanted to make sure they tested  
23 that change between what they used to do and what  
24 they did do if they made a change. So that way the

1 responses from '10 and '13 could be then used as  
2 trend data from '22 or whatever the case was.

3 So that was very important to be able to  
4 have trend data that was reliable no matter the  
5 methodology.

6 Q. So in the 2013 report -- well, let me ask  
7 this with respect to a specific page.

8 Could you turn to Page 10 of the report  
9 which is NSSF 109?

10 A. Okay.

11 Q. Could you read this page to yourself and  
12 just let me know when you're done?

13 A. Okay. I'm done.

14 Q. Based on this description of the  
15 methodology, do you perceive any differences in the  
16 way this survey was conducted compared with the  
17 survey underlying the 2013 report?

18 A. So the first thing that stands out to me  
19 is it looks like, if my memory serves me right,  
20 they didn't put it out there due to COVID, which is  
21 good, and personnel changes.

22 Second thing that stands out to me is in  
23 the first sentence of the second paragraph, the  
24 online survey covered various aspect of MSR

1 ownership behaviors and attitudes. The NSSF  
2 promoted survey via a partner email distribution  
3 list.

4 So I think that differs a little bit  
5 about, you know, the methodology we had done  
6 ten years ago. And, again, methodologies change  
7 over time. So I'm not saying there's anything  
8 wrong with this at all, but it is -- looks  
9 different than what we had done ten years prior.

10 Q. Okay. The bottom of this page has some  
11 information that says, completed surveys 2,421.  
12 Below that it says, usable responses for analysis,  
13 2,185.

14 Do you see that?

15 A. Correct.

16 Q. That's significantly less than the number  
17 of usable responses for the 2013 report, correct?

18 A. Correct.

19 Q. This methodology states that the aim is to  
20 provide the NSSF and manufacturer's insights on  
21 current consumer needs and the uses of MSRs as well  
22 as educate those influencing public policy in the  
23 effort to preserve our constitutional rights.

24 Do you see that there?

1 A. Correct. Yep.

2 Q. The stated purpose of gathering  
3 information about consumer needs and uses of modern  
4 sporting rifles, was that also a purpose underlying  
5 the 2013 report?

6 A. I don't believe that was the exact purpose  
7 of the other one. So you had said -- so the  
8 purpose -- okay. The first part of it, NSSF and  
9 manufacturer insights on current consumer needs and  
10 uses, that was a big function of us in 2013 as well  
11 as educate those influenced by public policy.

12 So that is different, you know, than what  
13 I had done in 2013 probably due to, you know, shift  
14 in the marketplace.

15 Q. So I want to drill down on that.

16 A. But I -- I'm sorry. I've cut you off.  
17 But I did not have anything to do with writing of  
18 that.

19 Q. Understood. And my question is really  
20 about the 2013 report. I just want to use this as  
21 a comparison point.

22 So the part where it says the aim is to,  
23 ellipses, educate those influencing public policy  
24 in the effort to improve our constitutional rights,



1 was that also a purpose underlying the 2013  
2 consumer survey report?

3 A. Going back ten years, I know our primary  
4 purpose -- our main focus was to provide  
5 information to NSSF members.

6 Now, are some NSSF members -- were some  
7 NSSF members policy folks at the time? Probably.  
8 But my individual focus -- my personal focus was to  
9 have that for our members.

10 Again, back then there wasn't as much  
11 public policy that was being done at NSSF in 2013  
12 that there's now being done there, so there may  
13 just be an internal shift to that and maybe that's  
14 why they added that.

15 MR. HAZINSKI: You can set this exhibit aside.

16 I'll give you the next exhibit which is  
17 Number 8.

18 (WHEREUPON, Curcuruto Deposition  
19 Exhibit No. 8 was marked for  
20 identification.)

21 MR. HAZINSKI: This is a document titled  
22 National Shooting Sports Foundation Modern Sporting  
23 Rifle Online Study, for the record Bates range NSSF  
24 181 through 197.

1 BY MR. HAZINSKI:

2 Q. Now, you may not have seen this specific  
3 document before, but are you generally familiar  
4 with what type of document this is?

5 A. Give me one minute to review it real  
6 quick. Sorry.

7 Q. So have you had a chance to flip through  
8 it?

9 A. I have. Thank you.

10 So this type of document here is just a  
11 Word format of a survey questionnaire. I don't  
12 know if this is final or not. But sometimes  
13 with -- many times with surveys if you have an  
14 online link and you take -- a respondent takes the  
15 survey questionnaire, if they answer a certain  
16 question one way, they'll be redirected to one  
17 answer. If they answer a question another way,  
18 they'll be redirected to another way.

19 Having a paper survey is one way to easily  
20 track the survey questions. We call it logic where  
21 if you said yes to question one, you get question  
22 two. If you said no to question one, you get  
23 question three. Sometimes it's easier to look on  
24 paper than it is on . . .

1 Q. Does the final version of this type of  
2 document list all of the questions that could  
3 potentially be posed to survey respondents for  
4 purposes of consumer surveys?

5 A. So I wouldn't know about this particular  
6 document, but documents similar to this that I  
7 worked on had a lot of iterations. So much so that  
8 sometimes my client would get -- or my vendor would  
9 get mad at me for making changes. You know, like  
10 just pick the thing.

11 So, for example, when we had a final  
12 version, 7.6, Version 7.6, when it was final,  
13 that's what then went into the online survey  
14 questionnaire and then out to folks.

15 So I don't know again if this is the  
16 final, you know, version that they used for the  
17 '21, '22 survey.

18 Q. The first page of this document on  
19 NSSF 181 includes a few paragraphs of text at the  
20 beginning.

21 Is this text typically statements or  
22 information that is shared with survey respondents  
23 that they can see as they begin filling out the  
24 survey?

1           A.     I'm just gonna take a look through it real  
2 quick.

3                     Okay.   So after taking a quick look at the  
4 introductory on Page 1, NSSF 181, it looks to me  
5 like this would be the introductory copy or text  
6 that a respondent would get or a potential  
7 respondent would get.

8                     Sometimes we create a landing page that  
9 would -- you know, if you click on a banner, it  
10 would bring you to a landing page with entry text  
11 like this explaining what the survey was.

12                    As time passed on and you have direct  
13 emails, somebody gets an email.  They click on that  
14 email.  This would be kind of like a landing page.  
15 It's the first thing they'd see before taking the  
16 survey to determine, okay, that's me.  I'll take  
17 this.  I have time.  That type of thing.

18            Q.     I would like to direct your attention to  
19 the second paragraph.  The second sentence says,  
20 insights will be used to help educate those  
21 influencing public policy in the effort to preserve  
22 our constitutional rights.

23                    Do you see that?

24            A.     I do.

1 Q. Was that statement or any statement  
2 similar to that made to survey respondents for the  
3 2013 consumer survey report?

4 A. To the best of my recollection, I do not  
5 believe so. Again, our focus back 2013, ten years  
6 ago, was to make sure our members could have this  
7 data and use it as they see fit.

8 Again, were there politically insight  
9 folks that used that data in 2013? Probably, but I  
10 don't recall ever putting anything specific in the  
11 language to our introduction to the 2013 survey.

12 Q. From your time working at NSSF, do you  
13 have an understanding of how NSSF could use survey  
14 results to influence public policy?

15 A. So just repeating that. Do I have an  
16 understanding of how NSSF would use survey results  
17 to influence public policy? So, again, to my  
18 recollection I never personally, you know, got  
19 involved in that, putting, you know, instructions  
20 on consumer surveys like that.

21 Anecdotally or just in my mind, so for  
22 example, here we are today, right? So potentially  
23 this data is now being used in a case to -- let me  
24 get the verbiage here -- to educate those

1 influencing public policy, does that make sense?

2 Q. From the perspective of ensuring that  
3 surveys have a reliable methodology, do you have  
4 any concerns about including this or similar  
5 language at the beginning of a survey?

6 MR. LOTHSON: I'll object just to the extent  
7 he's not an NSSF 30(b)(6) witness. He's here to  
8 testify to his individual capacity. This is a 2021  
9 survey. I think it's beyond the scope of this  
10 deposition in his individual capacity.

11 MR. HAZINSKI: You can set this exhibit to the  
12 side. This will be Exhibit 9.

13 (WHEREUPON, Curcuruto Deposition  
14 Exhibit No. 9 was marked for  
15 identification.)

16 MR. HAZINSKI: For the record, Bates stamp  
17 NSSF 3967 through 3985.

18 BY MR. HAZINSKI:

19 Q. Mr. Curcuruto, have you seen this document  
20 before?

21 A. So I believe Mr. Vogts had sent me an  
22 email with several NSSF emails like this, but I  
23 assume that this is pretty much what was sent to me  
24 in one of those emails.

1 Q. This appears to be an email from someone  
2 named Adam Hile, H-I-L-E, to you from -- dated  
3 November 20, 2022, correct?

4 A. Correct.

5 Q. And who is Adam Hile?

6 A. It looks like he's an employee of Sports  
7 Marketing Surveys USA. And I see that Keith was  
8 copied on this as well. I recall Keith being my  
9 primary contact, and I'm sure I had worked with  
10 Adam in some capacity as well.

11 Q. Do you know what Adam Hile's role was at  
12 Sports Marketing Surveys?

13 A. Off the top of my head I would have never  
14 been able to tell you, but just looking at the  
15 email I see his title is senior research analyst.

16 Q. Do you have any recollection of what his  
17 involvement was in the process for creating the  
18 2022 consumer survey report to the extent you were  
19 involved in that as well?

20 A. So to the best of my recollection, what  
21 makes sense is Adam -- seems to be he would have  
22 been a programmer. I think as you in the  
23 attachment it says, NSSF survey V5. So we're  
24 already on V, Version, 5. And there was probably

1 several other versions after this before it went to  
2 the field.

3 Q. So I want to direct your attention to the  
4 attachment to this document. It starts on the  
5 second page, NSSF 3968.

6 Do you see that?

7 A. Correct.

8 Q. And this is the attachment to the email  
9 that was addressed to you, right?

10 A. Correct.

11 Q. And this attachment on the first page  
12 includes language in the second paragraph that  
13 says, insights will also be used to help educate  
14 those influencing public policy in the effort to  
15 improve our constitutional rights, correct?

16 A. Second paragraph, last sentence?

17 Q. Right.

18 A. Correct.

19 Q. Was it your typical practice at NSSF to  
20 review drafts of documents like these prepared by  
21 Sports Marketing Surveys?

22 A. It was, yeah. Certainly before a final  
23 document went out.

24 Q. Do you recall telling anybody, whether at



1 NSSF or Sports Marketing Surveys, about any  
2 concerns regarding the sentence, insights will also  
3 be used to help educate those influencing public  
4 policy in the effort to preserve our constitutional  
5 rights?

6 A. Unfortunately, I don't have any  
7 recollection of that. It doesn't stand out as I  
8 sit here today as anything alarming. So I'm not  
9 sure I would have been alarmed if reading it during  
10 this Version 5.

11 Q. As you sit here today, do you believe that  
12 telling survey respondents that their results might  
13 be used to influence firearm policies could affect  
14 the reliability of the survey results?

15 A. I don't. I don't see how a respondent  
16 would answer a question if they own, you know, such  
17 as if they own a modern sporting rifle or, you  
18 know, how much they bought it for, I don't see how  
19 they would shift their responses because it says,  
20 you know, that sentence on there.

21 Q. After reviewing this language did you take  
22 any additional steps to ensure that the inclusion  
23 of this language would not skew or bias the data?

24 A. After reviewing it, you know, back in

1 November 2020, I knew it wasn't a complete version.  
2 So obviously I don't see any notes on it. It  
3 wasn't something that we had thought was an issue  
4 or to change.

5 Q. The language in this paragraph -- the  
6 organization of the language in this paragraph  
7 we've been discussing actually differs slightly in  
8 this version as compared with the final version of  
9 the -- I shouldn't say final. Let me strike that  
10 question and ask it a new way.

11 The organization of the language in the  
12 second paragraph on NSSF 3968 differs somewhat from  
13 the organization of the language in the second  
14 paragraph on NSSF 181, correct?

15 A. Yeah. For example, the second paragraph  
16 on 181, it says, insights will be used. And on  
17 that second sentence, second paragraph, on 3968,  
18 the results of the study will help.

19 So, yeah, there appears to be some  
20 differences. And I'm not sure. Is 181 Version 6?  
21 Version 5? Version 4? Are you aware of that? I'm  
22 not sure.

23 Q. Well, the footer on NSSF 3968 says  
24 NSSF MSR 2020 survey, compared to the footer on

1 NSSF 181, for example, says NSSF MSR 2021 survey,  
2 right?

3 A. Correct, which would indicate that it's a  
4 later version and potentially one -- most likely  
5 one that I was not involved with, I believe.

6 Q. And comparing the second paragraph on each  
7 of these pages in what seems to be the earlier  
8 version of this document, the sentence regarding  
9 the effort to preserve our constitutional rights is  
10 later, whereas on NSSF 181 it's put before the  
11 following sentence about consumer wants, needs and  
12 uses, right?

13 A. Correct. On 968, insights will also be  
14 used comes after the results of the study, whereas  
15 on 181, insights will be used comes before the  
16 results in the study.

17 Q. Do you know who made the decision to  
18 switch that order?

19 A. I do not.

20 Q. I want to direct your attention to Page 18  
21 of this exhibit, NSSF 3985. At the top of this  
22 page it says feedback for Jim to consider.

23 Do you see that?

24 A. Correct.

1 Q. Jim is you?

2 A. Yes. Yes, sir.

3 Q. Do you know who wrote the feedback for you  
4 to consider?

5 A. Just give me one second to read it.

6 So just after reviewing it, my assumption  
7 is the feedback came from Adam or Keith from Sports  
8 Marketing Surveys.

9 Q. I want to direct your attention to about  
10 halfway down the page. Do you see where it says,  
11 getting back to the self-defense issue?

12 A. Correct.

13 Q. I'll read there.

14 Getting back to the self-defense issue  
15 concerning MSRs, here are a couple questions we  
16 would really like to see added.

17 And then there are some questions listed  
18 below. Are you with me?

19 A. Okay.

20 Q. The first question asks, if you awoke to a  
21 home invasion in the middle of the night, which  
22 type of firearm would you prefer to have available  
23 to effectively address the threat.

24 Did I read that correctly?

1 A. Correct.

2 Q. The third question says, what type of  
3 firearm do you most commonly keep available for  
4 home defense.

5 Did I read that correctly?

6 A. Yes.

7 Q. Do you see that there's a marginal comment  
8 on the right-hand side that says, will not be  
9 added?

10 A. I do.

11 Q. Do you know who wrote that comment?

12 A. I'm not sure. And this is kind of -- none  
13 of this rings a bell because it's a couple years --  
14 four years old. But I see in the comments it says,  
15 parentheses, AH 34. So AH seems to be the initials  
16 of Adam Hile. So I would assume Adam wrote that  
17 comment.

18 Q. In the course of your typical practices at  
19 NSSF, would you have been involved in making the  
20 decisions about whether to incorporate this type of  
21 feedback?

22 A. Yep. For surveys like this, you know, I  
23 did the heavy lifting on it. When I was at the  
24 point we were at, you know, Version 6, 7 or 8, we

1 were near the final version that I was comfortable  
2 with and ready to go with, we would -- I would do  
3 an internal review among some people, potentially  
4 like Larry Keen would take a look at this or  
5 somebody on the relations team. Because these were  
6 starting to be used more in court cases, so I  
7 wanted to make sure we had everything covered  
8 correctly.

9 So, again, it appears that this version is  
10 not the completed version that went to field.  
11 Seems like potentially changes were made by  
12 somebody other than myself before it went into the  
13 field.

14 Q. Do you recall who made the decision not to  
15 include the three questions listed on this page?

16 A. Unfortunately, I don't recall. It may  
17 have been me. It may have been, you know, somebody  
18 else that I showed it to that said we don't need  
19 that question.

20 One of the things that, you know, we were  
21 very aware of is survey fatigue. So, you know,  
22 back in 2013 you could get away with a 18 to  
23 20-minute survey that took that long to respond to.  
24 Ten years later you want to be more like, you know,

1 8 to 10 or 15 max. And you want to shorten that  
2 because apparently people's attention spans have  
3 lowered over the past decade or so.

4 So that was one of the reasons why. You  
5 know, we would love to ask every question we could,  
6 but just due do time constraints, you know, a lot  
7 of times we cut those out.

8 Q. As you sit here today, do you have an  
9 independent recollection that the reason these  
10 questions were not included in the survey was to  
11 avoid survey fatigue?

12 A. As I sit here today, that is the primary  
13 reason that comes to me because in all the surveys  
14 we did, we cut just about every single one of them  
15 down. We always had more questions to ask than we  
16 had time for.

17 So that may have been a reason why some of  
18 these questions weren't added. And, again, I don't  
19 know if any of these questions made the final cut,  
20 you know, after I left there.

21 Q. So when I ask you if you have an  
22 independent recollection, what I specifically want  
23 to know is whether you have a specific memory  
24 associated with the decision to include or exclude

1 these questions rather than more generalized  
2 understanding of what you might have done or would  
3 have done.

4 So phrased slightly differently, do you  
5 independently recall whether these questions were  
6 excluded from the survey specifically for the  
7 reason of avoiding survey fatigue?

8 MR. LOTHSON: Objection, asked and answered  
9 and to the extent there was a question at the very  
10 end. If you have a different answer, go ahead.

11 THE WITNESS: Okay. So I don't specifically  
12 recall why questions were kept out of the final  
13 draft, if they were kept out. I'm not sure, to be  
14 honest with you, if this question made it in the  
15 final survey.

16 BY MR. HAZINSKI:

17 Q. In the middle of the page, the beginning  
18 of the part that I read says, getting back to the  
19 self-defense issue concerning MSRs.

20 Do you see that part?

21 A. Correct.

22 Q. What was the self-defense issue concerning  
23 MSRs?

24 A. So I don't recall specifically four years



1 ago this sentence out of the many things that was  
2 going on. But just sitting here today looking at  
3 it, it makes sense that the self-defense issue  
4 concerning MSRs would have most likely been about  
5 people -- consumers using a modern sporting rifle  
6 for self-defense.

7 Kind of one of the things that we  
8 established in the 2010 and 2013 survey from my  
9 recollection was modern sporting rifles were used  
10 for a lot of different purposes from hunting big  
11 game, small game, varmint, to collecting, to target  
12 shooting, recreationally, competitive. And home  
13 defense I think was one of the primary reasons why  
14 people -- so it would make sense if that was a  
15 primary reason to kind of dig further into that  
16 topic.

17 Q. Was NSSF interested -- as far as your own  
18 understanding, was NSSF interested in determining  
19 whether MSRs were commonly used for self-defense in  
20 the home?

21 A. To the best of my recollection, I would  
22 think that NSSF would like to know as much as  
23 possible, as well as our members, what all the uses  
24 were for MSRs including home and self-protection.

1 Q. Reading the first question listed on this  
2 sheet on NSSF 3985, and take a moment to review it  
3 if you like, do you believe that including this  
4 question would have provided NSSF with information  
5 about the -- about consumers' preferences for using  
6 modern sporting rifles for home defense?

7 A. So I believe, you know, having this  
8 question asked in a survey -- and, again, I'm not  
9 sure if this one made it to the final version or  
10 not -- it would give another data point to NSSF  
11 members using the insights gain, as well as NSSF  
12 staff to use to learn more about modern sporting  
13 rifle owners.

14 Q. Do you agree that survey responses to this  
15 question or a similar question might indicate  
16 whether MSRs are a preferred weapon for home  
17 defense in comparison to the other listed  
18 categories of weapons?

19 A. Yeah. So the way I read it, you know, I  
20 have a marketing background as well as some  
21 research and sales. So, for example, if the  
22 majority of responses came in that the primary  
23 firearm that I would use in a home invasion and  
24 2,000 people responded that it would be a shotgun

1 or an AR, you can develop marketing campaigns and  
2 say, hey, protect yourself in home defense.

3 And whether that person has a shotgun or  
4 has a modern sporting rifle, you're using insights  
5 gained to have better marketing campaigns to help  
6 relate to your customers.

7 So if a customer's using that product, you  
8 want to -- you don't want to have a marketing  
9 campaign that says, you know, use your modern  
10 sporting rifle for, you know, protecting your boat  
11 or something like that when nobody says they're  
12 protecting their boat with a modern sporting rifle,  
13 but they're protecting their home. You could have  
14 that in your marketing campaign, if that makes  
15 sense.

16 Q. Is the reason that NSSF decided to exclude  
17 the first and third questions on this page from its  
18 consumers survey that the answers might have  
19 suggested that modern sporting rifles are not in  
20 fact the weapon most -- the category of weapon most  
21 commonly preferred for home self-defense?

22 MR. LOTHSON: I'll object. Again, he's not a  
23 30(b)(6). That deposition was a couple weeks ago,  
24 and he can answer in his own individual capacity.

1 THE WITNESS: Sure. So, again, I don't know if  
2 these questions were or weren't included, but being  
3 an insights guy I want to ask a thousand questions,  
4 right? I want to have as much data as I can so  
5 that way I can make a great decision later.

6 So if it was up to me, I'd ask a lot more  
7 questions than, you know, we were able to in the  
8 time, but we knew that we couldn't ask that many  
9 questions.

10 MR. HAZINSKI: Give me just a moment here.

11 THE WITNESS: Of course, yeah, yeah.

12 MR. HAZINSKI: All right. Thank you,  
13 Mr. Curcuruto. I don't have any other questions  
14 for you.

15 MR. LOTHSON: I just have a couple.

16 EXAMINATION

17 BY MR. LOTHSON:

18 Q. Back to Exhibit -- the large exhibit of  
19 the spreadsheet, AB 23, NSSF 2351. I'm not sure  
20 what number that was. Exhibit 3, if you return to  
21 that, either seventh or eight page where there was  
22 a comment box discussed, keep going. That page  
23 right there.

24 It's a comment from you, Jim Curcuruto,

1 wherein it talks about 75 percent of total MSRs  
2 slash AK made in U.S., but not sure if all are AK.  
3 Need to contact.

4 Do you see that?

5 A. Correct.

6 Q. Okay. Did the 75 percent number come from  
7 the manufacturer?

8 A. I think we discussed this earlier. The  
9 process was, yeah, to get as many responses as  
10 possible from the manufacturer.

11 So to the best of my recollection, you  
12 know, I had saw the 90 and 45, wasn't sure of it.  
13 Contacted the manufacturer, and they gave me the  
14 75 percent, which I believe John -- Mr. John had  
15 said was the 108,000. That's what's plugged in. I  
16 forgot what number that was in.

17 Q. AB 23, I believe.

18 So 75 percent of 144,000 was represented  
19 to be 108,000; is that right?

20 A. Oh, is 108 -- again, I don't have a  
21 calculator, but that would make sense if I had  
22 144,000 total. I called up the manufacturer. They  
23 said you can apply 75 percent to that. 144,000  
24 times 75 percent is 108. If that's what's plugged

1 in, so kind of corroborates I think what we talked  
2 about earlier.

3 MR. LOTHSON: That's all the questions I have  
4 for now.

5 MR. HAZINSKI: Just a little follow-up on that.

6 FURTHER EXAMINATION

7 BY MR. HAZINSKI:

8 Q. How do you know the 75 percent number came  
9 from a manufacturer?

10 A. You know, like we talked about earlier, to  
11 the best of my recollection -- and I did this  
12 report over a lot of years. Unfortunately, I  
13 haven't done it -- well, fortunately, I haven't  
14 done it over the past several years.

15 But the method I used was, you know,  
16 either knowing the manufacturer and knowing that  
17 their entire product mix was MSR, plugging that  
18 number in. The second thing would be to check out  
19 the website, and then third thing to contact them.

20 According to this note, it looked like I  
21 need to contact them. And then 75 percent, high  
22 probability that the manufacturer told me that  
23 that's the number. I wouldn't have made up  
24 75 percent.

1 Q. What you documented in this comment box,  
2 and for the record we're back at the comment for  
3 Cell AB 23. At the end you documented going to use  
4 90K to be safe as no response from company, right?

5 A. Correct. And, you know, the way I read  
6 that when we talked about that before, it almost  
7 looks like, you know, that was a comment in there.  
8 And then the most recent comment, 75 percent are  
9 total.

10 So in my mind it would have been, okay, I  
11 didn't know. I found out it was 75 percent,  
12 plugged that note in. And then that's kind of  
13 shown by plugging in the 108 in the chart there.

14 I just wouldn't have plugged in a number  
15 that I didn't get from the manufacturer in the  
16 chart. We kind of referenced that before. If I  
17 didn't know it, I'd put a zero in.

18 Q. You used the phrase in your last answer,  
19 the most recent comment.

20 What did you mean by that?

21 A. So I'm going to read that entire comment.  
22 So the very first part of the comment seems like it  
23 would have -- you know, I might have made the  
24 comment, 75 percent of total MSRs made in U.S., but

1 not sure if all are AK, need to contact  
2 manufacturer.

3 So I would think the most recent portion  
4 of that is the 75 percent are total MSRs. Again,  
5 when that comment was made 2016, I believe. Again,  
6 from what I can recall, I'm not gonna plug in a  
7 number unless the manufacturer told me that.

8 So as I'm sitting here today, I would say  
9 the high probability the manufacturer gave me that  
10 75 percent.

11 Q. So your testimony is that because it  
12 appears first in the comment, the 75 percent number  
13 is the last information that you entered in the  
14 comment box?

15 MR. LOTHSON: Objection, asked and answered.

16 BY MR. HAZINSKI:

17 Q. Just want to be clear.

18 A. Sure. So going back to my previous  
19 response and to clarify, I wouldn't have plugged in  
20 any number without getting a solid response from  
21 the manufacturer.

22 So as I'm sitting here today, the 108,000  
23 that we plugged into AB 23 in my opinion would have  
24 come directly from the manufacturer, and that's



1 that 75 percent that's in the comment box.

2 Q. The second sentence or clause in this  
3 comment says, need to contact?

4 A. Correct.

5 Q. When relatively to the other language in  
6 this comment was that written?

7 A. Again, we're talking about, you know,  
8 2016. So to the best of my recollection, I would  
9 have made a note, need to contact. Contacted them,  
10 found out, put the 108 in. There's no other  
11 process that, you know, that existed. I need to  
12 contact, and then I put it without contacting them.  
13 I would never put in the 108. It just makes no  
14 sense.

15 As we discussed before, we want to make  
16 sure that we're putting out a product that is  
17 something that our members could use and also err  
18 on the side of caution. We don't want to inflate  
19 the number to have manufacturers, you know, think  
20 differently. We would rather have it err on the  
21 side of caution in most cases.

22 Q. The part of this comment that says, no  
23 response from company, is that accurate today?

24 MR. LOTHSON: Objection, form.

1 THE WITNESS: So I wouldn't have wrote it if I  
2 didn't get a response. So to me that means in 2016  
3 I saw the numbers. I wanted to clarify. I  
4 originally called them. I got no response from  
5 them. You know, originally made that comment, went  
6 back.

7 We didn't just say, oh, we tried once and  
8 we gave up. We kept trying and then finally heard  
9 from somebody that said 75 percent, 144 times  
10 75 percent, that 108 which is the number that we  
11 plugged in.

12 BY MR. HAZINSKI:

13 Q. Are you aware of any documents or other  
14 records reflecting or supporting your claim that  
15 the 75 percent number came from the manufacturer  
16 directly?

17 A. I am not aware of any others, no.

18 Q. So the only indication that that would be  
19 true would be based on your interpretation of  
20 what's recorded in this box; is that fair?

21 A. On top of the comments also my process. I  
22 mean, I know my process. As you can see I did this  
23 report for many years, and the process, you know,  
24 is not a complex one. There's no way I would have

1 entered a number without having a very reliable  
2 response on it.

3 Q. And part of that process involved, at  
4 least in some cases, looking at manufacturer  
5 websites to generate an estimate of what proportion  
6 of firearms that they offered for sale were in the  
7 category of modern sporting rifles, right?

8 A. Correct.

9 Q. Why was that part of your process?

10 A. So if I did not know a manufacturer's  
11 product line, I'd go to their website. If their  
12 website was a hundred percent AR-15s, what we  
13 defined at the time as modern sporting rifles, I  
14 could take that number and plug it into the chart.

15 If it wasn't, I would call the  
16 manufacturer and say, hey, you've got this number  
17 from the app or data. I see you've got a mix of  
18 product. Can you tell me what that percentage is?

19 When I heard from that manufacturer, I  
20 plug it in. If I didn't hear from them as we  
21 talked about before, I'd err on the side of caution  
22 and plug in that zero.

23 Q. Just one moment, please.

24 A. Of course.

1 Q. Is it your testimony that it was not your  
2 practice to examine manufacturer websites to arrive  
3 at initial estimates of what proportion of their  
4 rifles counted as MSRs to generate a preliminary  
5 estimate of MSR production?

6 MR. LOTHSON: Objection, he's testified on this  
7 four different times. His testimony is what it is.  
8 Asked and answered. And you can have him read back  
9 his prior answers if you want. He can go ahead and  
10 answer it again for a fifth time if you want to.

11 MR. HAZINSKI: We can go back to the first  
12 testimony or you can just answer.

13 THE WITNESS: If you want to restate that  
14 because you kind of lost me, I do apologize. It  
15 was a long question that took a second to get out,  
16 so I kind of lost it.

17 BY MR. HAZINSKI:

18 Q. Strictly for my clarification.

19 A. Sure.

20 Q. I realize this was a long time ago, and  
21 I'm asking you to recall details from an earlier  
22 period.

23 A. Sure.

24 MR. LOTHSON: About something that happened

1 ten years ago.

2 MR. HAZINSKI: I'd ask you just to keep it to  
3 form. We're almost done.

4 BY MR. HAZINSKI:

5 Q. I understood your initial testimony on  
6 this subject that you gave today to be that you  
7 could examine manufacturer websites to determine  
8 whether 100 hundred percent or something less than  
9 100 percent of the rifles produced were in the  
10 category of modern sporting rifles; is that  
11 accurate?

12 A. Correct. That was one of the criteria we  
13 used to plug in some numbers into the chart.

14 Q. Is it your testimony that if there were  
15 fewer than 100 percent of modern sporting  
16 rifles -- strike that question.

17 Is it your testimony that if fewer than  
18 100 percent of the rifles produced by a given  
19 manufacturer were not modern sporting rifles, that  
20 you would not document that information in this  
21 spreadsheet?

22 MR. LOTHSON: Objection, form, asked and  
23 answered.

24 THE WITNESS: So --

1 MR. LOTHSON: Confusing, compound.

2 THE WITNESS: I think I understand it. So  
3 that's not my testimony. So my testimony would be  
4 if I went to a website and not all products listed  
5 are what I considered under our definition of a  
6 modern sporting rifle, then I would contact that  
7 manufacturer with a number from the AFMER.

8 Okay. I have 2300 as the number. Can you  
9 tell me how many of those 2300 are what you  
10 consider modern sporting rifle under this  
11 definition. They would say 2,000. I plug in  
12 2,000. But I wouldn't plug in a number without,  
13 you know, cooperation from a manufacturer if there  
14 was a mix of products that were both traditional  
15 and modern sporting rifle.

16 MR. HAZINSKI: I have no further questions.

17 MR. LOTHSON: Nor do I at the moment. And we  
18 will reserve signature.

19 MR. MAAG: I actually do have a couple  
20 questions, very few, just to clarify some things.

21 EXAMINATION

22 BY MR. MAAG:

23 Q. Sir, when you say modern sporting rifles,  
24 does that mean anything other than an AR-15 variant

1 or an AK-47 variant?

2 A. Did you just join?

3 Q. No. I've been on for hours. I've just  
4 been keeping my mouth shut?

5 A. You'd have to listen to all the previous  
6 responses. We covered that pretty substantially.

7 Q. Well, for instance, would an M1 carbine be  
8 a modern sporting rifle?

9 A. I'm sorry. What was the question?

10 Q. Would an M1 carbine beam be a modern  
11 sporting rifle?

12 A. I would have to do some research on that.

13 Q. Would an Uzi variant be a modern sporting  
14 rifle?

15 A. I would have to do some research on that.

16 Q. All right. Well, the ultimate point of my  
17 question is, there's probably lots of models of  
18 semi-automatic firearms that are not included in  
19 the totals for modern sporting rifles; is that  
20 accurate?

21 MR. HAZINSKI: Object to the form.

22 THE WITNESS: Go ahead and ask that again. I'm  
23 missing a little something that came through.

24

1 MR. MAAG:

2 Q. Sure. Is it fair to say that there are  
3 probably numerous makes and models of firearms,  
4 rifles, semi-automatic rifles that are not included  
5 in the definition of quote, unquote, modern  
6 sporting rifles?

7 A. So to the best of my recollection, using  
8 the definition of modern sporting rifle in we've  
9 been talking about today, semi-automatic rifle, AR,  
10 AK platform capable of a detachable magazine,  
11 one-pull of the triggers, one round exposed, you  
12 know, that -- there is a specific group of firearms  
13 that would fall under that category, and there are  
14 plenty of other semi-automatic rifles that do not  
15 fall under that definition.

16 Q. And as you used the definition today,  
17 you're referring to the AR-15 and AK-47 platform as  
18 modern sporting rifles?

19 A. Correct.

20 Q. Okay. And none of the firearms you're  
21 referring to as a modern sporting rifles are  
22 machine guns as defined by federal law?

23 A. So, you know, without looking up the  
24 federal law, in my opinion a machine gun -- the



1 difference between a machine gun and a  
2 semi-automatic, machine gun you can depress the  
3 trigger and rounds will fire until the magazine is  
4 empty or until you've release your pressure from  
5 that.

6 So there are no machine guns counted in  
7 the modern sporting rifle chart that we were  
8 talking about today.

9 MR. MAAG: I have no further questions. Thank  
10 you very much.

11 MR. LOTHSON: That's it. We will reserve  
12 signature and take a copy. He'll read it.

13 (WHEREUPON, the deposition  
14 concluded at 3:18 p.m.)

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1 I, RAELENE STAMM, Certified Shorthand  
2 Reporter, licensed by the State of Illinois, do  
3 hereby certify that heretofore, to-wit, on the  
4 13th day of June, 2024, personally appeared before  
5 me JIM CURCURUTO, a witness in a certain cause now  
6 pending and undetermined in the United States  
7 District Court, Southern District of Illinois,  
8 wherein CALEB BARNETT, et al., are the Plaintiffs  
9 and KWAME RAOUL, et al., are the Defendants.

10 I further certify that the said  
11 JIM CURCURUTO was by me first duly sworn to testify  
12 the truth, the whole truth, and nothing but the  
13 truth in the cause aforesaid; that the testimony  
14 then given by said witness was reported  
15 stenographically by me in the presence of said  
16 witness and afterwards reduced to typewriting by  
17 Computer-Aided Transcription, and the foregoing is  
18 a true and correct transcript of the testimony so  
19 given by said witness as aforesaid.

20 I further certify that the signature to  
21 the foregoing deposition was not waived by counsel  
22 for the respective parties.

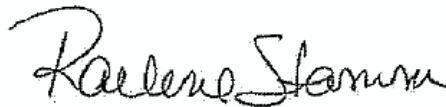
23 I further certify that the taking of this  
24 deposition was pursuant to Notice and that there

1 were present at the deposition the attorneys  
2 hereinbefore mentioned.

3 I further certify that I am not counsel  
4 for nor in any way related to the parties to this  
5 suit, nor am I in any way interested in the outcome  
6 thereof.

7 IN TESTIMONY WHEREOF: I have hereunto set  
8 my hand this 5th day of June, 2024.

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July 5, 2024

To: ANDREW A. LOTHSON

Case Name: Barnett, Caleb, Et Al. v. Raoul, Kwame, Et Al.

Veritext Reference Number: 6751326

Witness: Jim Curcuruto                      Deposition Date: 6/13/2024

Dear Sir/Madam:

Enclosed please find a deposition transcript. Please have the witness review the transcript and note any changes or corrections on the included errata sheet, indicating the page, line number, change, and the reason for the change. Have the witness' signature notarized and forward the completed page(s) back to us at the Production address shown above, or email to [production-midwest@veritext.com](mailto:production-midwest@veritext.com).

If the errata is not returned within thirty days of your receipt of this letter, the reading and signing will be deemed waived.

Sincerely,  
Production Department

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DEPOSITION REVIEW  
CERTIFICATION OF WITNESS

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

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

I have made no changes to the testimony as transcribed by the court reporter.

\_\_\_\_\_  
Date Jim Curcuruto

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

They have read the transcript;  
They signed the foregoing Sworn Statement; and  
Their execution of this Statement is of their free act and deed.

I have affixed my name and official seal  
this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

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Commission Expiration Date

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DEPOSITION REVIEW  
CERTIFICATION OF WITNESS

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

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

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

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

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

\_\_\_\_\_  
Date Jim Curcuruto

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

- They have read the transcript;
- They have listed all of their corrections in the appended Errata Sheet;
- They signed the foregoing Sworn Statement; and
- Their execution of this Statement is of their free act and deed.

I have affixed my name and official seal this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

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Notary Public

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ERRATA SHEET  
VERITEXT LEGAL SOLUTIONS MIDWEST  
ASSIGNMENT NO: 6751326

PAGE/LINE(S) / CHANGE /REASON

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Date Jim Curcuruto

SUBSCRIBED AND SWORN TO BEFORE ME THIS \_\_\_\_\_  
DAY OF \_\_\_\_\_, 20\_\_\_\_\_ .

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Notary Public

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Commission Expiration Date

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

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

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

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

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

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

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

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

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