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Higbie v James, et al – 10-18-24	– Michael Veotruba	1	Higbie v James, et al – 10-1	8-24 – Michael Veotruba
UNITED STATES DIS	TRICT COURT	2	INDEX OF PR	
NORTHERN DISTRICT	Γ OF NEW YORK	3	MICHAEL VEOTRUBA; S	Sworn
CARL HIGBIE, JOSEPH HARR	IS, and	4	Direct Examination by Mr.	
MICHAEL VEOTRUBA,		5	,	Ü
Plaintiffs,		6		
V Index No.: 24	-CV-0174 MAD/TWD	7		
STEVEN G. JAMES, in his Office	cial	8		
Capacity as Superintendent of the	2	9		
New York State Police, SHERIFI		10		
BOURGAULT, in his Official Ca	apacity as	11		
the Sheriff of Rensselaer County,	New York,	12		
SHERIFF DONALD J. KRAPF,	in his Official	13		
Capacity as the Sheriff of Columb	bia,	14		
New York, and JOHN DOES 1-1	10,	15		
Defendants.		16		
	X	17		
DEPOSITION OF: MICE		18		
DATE: October 18,		19		
TIME: 1:01 p.m. to		20		
VENUE: Microsoft 7		21		
		22		
		23		
Reported by Annette Lainson		24		
1		25		
	Page 1			Page 3
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1 Higbie v James, et al – 10-18-24 – Michae	el Veotruba	1	Higbie v James, et al – 10-1	8-24 – Michael Veotruba
2 APPEARANCES:		2	EXHIBIT IN	
3 FOR THE PLAINTIFFS:		3	Marked as	DEN
4 STAMBOULIEH LAW, PLLC		4	Described as	
5 BY: STEPHEN STAMBOULIEH,	ESQ.	5	One	22
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1	Higbie v James, et al – 10-18-24 – Michael Veotruba	1	Higbie v James, et al – 10-18-24 – Michael Veotruba
2	STIPULATIONS	2	be a bar or waiver to make such motion at, and is
3	IT IS HEREBY STIPULATED AND AGREED by	3	reserved to, the trial of this action.
4	and between counsel for the respective parties hereto	4	IT IS HEREBY STIPULATED AND AGREED by
5	that:	5	and between counsel for all parties present that
6	All rights provided by the Civil	6	pursuant to CPLR section 3113(d) this deposition is
7	Practice Law and Rules, including the right to object	7	to be conducted by video conference, that the court
8	to any question, except as to form, or to move to	8	reporter, all counsel, and the witness are all in
9	strike any testimony at this examination is reserved.	9	separate remote locations (except the witness and his
10	And, in addition, the failure to object to any	10	counsel are in the same physical location) and
11	question or to move to strike testimony at this	11	participating via videoconference meeting under the
12	examination shall not be a bar or waiver to make such	12	control of Associated Reporters International, Inc.
13	motion at, and is reserved for the trial of this	13	(ARII), that the officer administering the oath to
14	action;	14	the witness need not be in the place of the
15	IT IS FURTHER STIPULATED AND AGREED by	15	deposition and the witness shall be sworn in remotely
16	and between counsel for the respective parties	16	by the court reporter after confirming the witness's
17	hereto, that this examination may be sworn to by the	17	identity, that this videoconference will not be
18	witness being examined before a Notary Public, other	18	recorded in any manner and that any recording without
19	than the Notary Public before whom this examination	19	the express written consent of all parties shall be
20	was begun, but the failure to do so, or to return the	20	considered unauthorized, in violation of law, and
21	original of this examination to counsel, shall not be	21	shall not be used for any purpose in this litigation
22	deemed a waiver of the rights provided by Rule 3116	22	or otherwise.
23			
	and 3117 of the Civil Practice Law and Rules, and	23	IT IS FURTHER STIPULATED that exhibits
24	shall be controlled thereby;	24	may be marked by the attorney presenting the exhibit
25	IT IS FURTHER STIPULATED AND AGREED by	25	to the witness, and that a copy of any exhibit
	Page 5		Page 7
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1	Higbie v James, et al – 10-18-24 – Michael Veotruba	1	Higbie v James, et al – 10-18-24 – Michael Veotruba
2	and between counsel for the respective parties	2	presented to a witness shall be e-mailed to or
3	hereto, that this examination may be utilized for all	3	otherwise in possession of all counsel prior to any
4	purposes as provided by the Civil Practice Law and	4	questioning of a witness regarding the exhibit in
5	Rules;	5	question. Unless otherwise agreed upon, all parties
6	IT IS FURTHER STIPULATED AND AGREED by	6	shall bear their own costs in the conduct of this
7	and between counsel for the respective parties	7	deposition by video conference, notwithstanding the
8	hereto, that the filing and certification of the	8	obligation by CPLR to supply a copy of the transcript
9	original of this examination shall be, and the same	9	to the deposed party by the taking party in civil
10	hereby are waived;	10	litigation matters.
11	IT IS FURTHER STIPULATED AND AGREED by	11	CPLR § 3113 Conduct of Examination (d)
12	and between counsel for the respective parties	12	states:
13	hereto, that a copy of the within examination shall	13	(d) The parties may stipulate that a
14	be furnished to counsel representing the witness	14	deposition be taken by telephone or other remote
1	testifying without charge;	15	electronic means and that a party may participate
15	conjuis winout charge,		electronic means and that a party may participate electronically. The stipulation shall designate
15 16	IT IS FURTHER STIPLII ATED AND AGREED by	16	ciccuonicany. The subulation shall designate
16	IT IS FURTHER STIPULATED AND AGREED by	16	
16 17	and between counsel for the respective parties	17	reasonable provisions to ensure that an accurate
16 17 18	and between counsel for the respective parties hereto, that all rights provided by the Civil	17 18	reasonable provisions to ensure that an accurate record of the deposition is generated, shall specify,
16 17 18 19	and between counsel for the respective parties hereto, that all rights provided by the Civil Practice Law and Rules, and Part 221 of the Uniform	17 18 19	reasonable provisions to ensure that an accurate record of the deposition is generated, shall specify, if appropriate, reasonable provisions for the use of
16 17 18 19 20	and between counsel for the respective parties hereto, that all rights provided by the Civil Practice Law and Rules, and Part 221 of the Uniform Rules for the Conduct of Depositions, including the	17 18 19 20	reasonable provisions to ensure that an accurate record of the deposition is generated, shall specify, if appropriate, reasonable provisions for the use of exhibits at the deposition; shall specify who must
16 17 18 19 20 21	and between counsel for the respective parties hereto, that all rights provided by the Civil Practice Law and Rules, and Part 221 of the Uniform Rules for the Conduct of Depositions, including the right to object to any question, except as to form,	17 18 19 20 21	reasonable provisions to ensure that an accurate record of the deposition is generated, shall specify, if appropriate, reasonable provisions for the use of exhibits at the deposition; shall specify who must and who may physically be present at the deposition;
16 17 18 19 20 21	and between counsel for the respective parties hereto, that all rights provided by the Civil Practice Law and Rules, and Part 221 of the Uniform Rules for the Conduct of Depositions, including the right to object to any question, except as to form, or to move to strike any testimony at this	17 18 19 20 21 22	reasonable provisions to ensure that an accurate record of the deposition is generated, shall specify, if appropriate, reasonable provisions for the use of exhibits at the deposition; shall specify who must and who may physically be present at the deposition; and shall provide for any other provisions
16 17 18 19 20 21 22 23	and between counsel for the respective parties hereto, that all rights provided by the Civil Practice Law and Rules, and Part 221 of the Uniform Rules for the Conduct of Depositions, including the right to object to any question, except as to form, or to move to strike any testimony at this examination, is reserved. And, in addition, the	17 18 19 20 21 22 23	reasonable provisions to ensure that an accurate record of the deposition is generated, shall specify, if appropriate, reasonable provisions for the use of exhibits at the deposition; shall specify who must and who may physically be present at the deposition; and shall provide for any other provisions appropriate under the circumstances. Unless otherwise
16 17 18 19 20 21 22 23 24	and between counsel for the respective parties hereto, that all rights provided by the Civil Practice Law and Rules, and Part 221 of the Uniform Rules for the Conduct of Depositions, including the right to object to any question, except as to form, or to move to strike any testimony at this examination, is reserved. And, in addition, the failure to object to any question, or to move to	17 18 19 20 21 22 23 24	reasonable provisions to ensure that an accurate record of the deposition is generated, shall specify, if appropriate, reasonable provisions for the use of exhibits at the deposition; shall specify who must and who may physically be present at the deposition; and shall provide for any other provisions appropriate under the circumstances. Unless otherwise stipulated to by the parties, the officer
16 17 18 19 20 21 22 23	and between counsel for the respective parties hereto, that all rights provided by the Civil Practice Law and Rules, and Part 221 of the Uniform Rules for the Conduct of Depositions, including the right to object to any question, except as to form, or to move to strike any testimony at this examination, is reserved. And, in addition, the	17 18 19 20 21 22 23	reasonable provisions to ensure that an accurate record of the deposition is generated, shall specify, if appropriate, reasonable provisions for the use of exhibits at the deposition; shall specify who must and who may physically be present at the deposition; and shall provide for any other provisions appropriate under the circumstances. Unless otherwise
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Highie v James, et al = 10-18-24 - Michael Veotruba the place of the deposition and the additional costs of conducting the deposition by telephonic or other remote electronic means, such as telephone charges, shall be borne by the party requesting that the deposition he conducted by such means. Highie v James, et al = 10-18-24 - Michael Veotruba, Modern Premote electronic means, such as telephone charges, shall be borne by the party requesting that the deposition he conducted by such means. Michael Lea Live. Core. Live. Jan. 1	Associa	ted Reporters Int'l., Inc. www.courtsteno.com	Associat	ted Reporters Int'l., Inc. www.courtsteno.com
the place of the deposition and the additional costs of conducting the deposition by telephonic or other remote electronic means, such as telephone charges, shall be borne by the party requesting that the deposition be conducted by such means. The property of the state of the conduction of the conducted by such means. The with the conduction of the conducted by such means. The with the with the conducted by such means. The with the with the conducted by such means. The with the with the conducted by the conducted by the conducted by such means. The with the with the conducted by the conducted	1	Highie v James et al = 10-18-24 = Michael Veotruha	1	Highie v James et al = 10-18-24 = Michael Veotruha
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6 deposition be conducted by such means. 7				
7 MH-CH-AF-L V-E-O-TR-U-B-A. 8 THE REPORTER: Thank you. The witness has been sworn. 10 MR. CALLAGHER: Thank you. 11 DIRECT EXAMINATION 12 BY MR. GALLAGHER: Thank you. 13 Good addenoon, Mr. Veotruba. My name is Matthew Gallagher. In an attorney with the Office of the Attorney General in New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the New York State in represent the superintendent of the plantific. Gord feather of the All Yes, sir. Page 10 Page 2 Page 3 Page 4 Page 5 Page 11 Page 4 Page 5 Page 11 Page 5 Page 11 Page 6 Page 11 Page 7 Page 11 Page 8 Page 12 Page 12 Page 13 Page 14 Page 15 Page 15 Page 16 Page 16 Page 17 Page 17 Page 17 Page 18 Page 18 Page 19 Page 11 Page 19 Page 11 Page 10 Page 11 Page 10 Page 11 Page 10 Page 11 Page 10 Page 11 Page 11 Page 11 Page 11 Page 11 Page 12 Page 11 Page 12 Page 11 Page 12 Page 13 Page 14 Page 15 Page 16 Page 16 Page 17 Page 17 Page 18 Page 19 Page 11 Page 19 Page 11 Page 10 Page 11 Page 10 Page 11 Page 12 Page 11 Page 11 Page 11 Page				
8 HERPORTER: Thank you. The witness bas been sworn. 10 MR. CALLAGHER: Thank you. 11 DIRECT EXAMINATION 12 12 BY MR. CALLAGHER: Thank you. 11 DIRECT EXAMINATION 12 DIRECT EXAMINATION 13 Q. Good aftermoon, Mr. Vootruba. My 14 name is Matthew Gallagher. The an attorney with the Office of the Attorney General in New York. It office of the Attorney General in New York. It office of the Attorney General in New York. It office of the Attorney General in New York. It office of the Attorney General in New York. It office of the Attorney General in New York. State Police, Steven G. James, in this action. I want to office of the Attorney General in New York State Police, Steven G. James, in this action. I want to office of the Attorney General in New York. State Police, Steven G. James, in this action. I want to office of the Attorney General in New York. State Police, Steven G. James, in this action. I want to office of the plaintiffs. Correct? 10 of the plaintiffs. Correct? 11 Higher v. James, et al.—10-18-24—Michael Veotruba 12 (The deposition commenced at 1:01 13 p.m.) 14 THE REPORTER: We are on the record. 15 Before I sware in the witness, if I could just get the theoryees to need the paperance for the record, please. 16 the attorneys to note their appearance for the record, please. 17 MS. THOMPSON: James Thompson, Also from the office of the attorney general on behalf of Steven James. 18 MR. GALLAGHER: Matthew Gallagher from the office of the attorney with the Office of the Attorney sent the want of the plaintiffs. 19 Columbia County attorney on the Control of the Attorney general on behalf of Steven James. 19 MS. THOMPSON: James Thompson, Also from the office of the attorney general on behalf of the plaintiffs. 10 Steven James. 11 MIR office of Steven James In the West of the Market State and the Attain the West of the Attain the Attain the West of the Market State and the Attain the West of the Market State and the Attain the West of the Market State and the Attain the West of the Market State and the Attain the W		deposition be conducted by such means.		THE WITNESS: Yes. Michael Veotruba,
9 has been sworn. 10 MR. GALLAGIER: Thank you. 11 DIRECT EXAMINATION 12 BY MR. GALLAGIER: Thank you. 13 Q. Good afternoon, Mr. Veotrubu. My 14 name is Matthew Gallagher. Pin an attorney with the 15 Office of the Attorney General in New York. 1 16 represent the superintendent of the New York State 17 Police, Silvern G. Junnes, in this action it want to 18 thank you five being here today, taking some time to 19 answer our questions. You understand that you are one 19 of the plaintiffs, correct? 20 here for a deposition in a case in which you are one 21 of the plaintiffs, correct? 22 A. Yes, sir. 23 Q. Okay. Have you ever been deposed 24 before? 25 A. No, sir. Page 9 800-523-7887 ARII@courtsteno.com 2 Higbie v James, et al – 10-18-24 – Michael Vcotruba 2 (The deposition commenced at 1:91) 3 p.m.) 4 Further FERFORTER: Wave me the record. 5 Before I swear in the witness, if I could just get 2 the attorneys to note their appearance for the 2 record, please. MR. GALLAGIER: Matthew Gallagher from 2 the office of the attorney general on behalf of 2 Seven James. 11 M. STANIBOLLIER: Stephen Stamboulich 12 on behalf of Superintendent James. 13 behalf of Superintendent James. 14 TIER REPORTER: Thank you. 15 MS. STANIBOLLIER: Stephen Stamboulich 16 on behalf of the plaintiffs. 17 M. SFITZSIMMONS: Robert Fitzsimmons, 18 Columbia County attorney on behalf of Defendant 19 Donald Krapf. 20 THE REPORTER: Thank you. 21 And if locald get you to raise your 22 right hand, please. Do you swear or affirm that the 23 testimony you've going to give will be the truth, the 24 whole truth, and nothing but the truth? 25 MS. VEOTRUBA: Yes. Page 10 Page 12	7		7	M-I-C-H-A-E-L V-E-O-T-R-U-B-A.
10 MR. GALLAGHER: Thank you. 11 DIRECT EXAMINATION 12 BY MR. GALLAGHER: Thank you. 12 BY MR. GALLAGHER: Thank you. 13 Q. Good afternoon, Mr. Voctruba. My 14 name is Matthew Gallagher. The and storney with the 15 Grossen the superintendent of the New York State 16 Ferposent the superintendent of the New York State 17 Police, Steven G. James, in this action. I want to 18 thank you for being here today, taking some time to 19 answer our questions. You understand that you are 19 answer our questions. You understand that you are 19 answer our questions. You understand that you are 19 answer our questions. You understand that you are 19 answer our questions. You understand that you are 19 answer our questions. You understand that you are 19 answer our questions. You understand that you are 19 answer our questions. You understand that you are 19 before? 20 A. Yes, sir. 22 A. Yes, sir. 23 Q. Okay. Have you ever been deposed 24 before? 25 A. No, sir. Page 9 800-523-7887 ARII@courtsteno.com 26 Highie v James, et al – 10-18-24 – Michael Voortuba 27 (The deposition commenced at 1:01 28 Grown few war in the witness, if I could just get 29 the attorneys to note their appearance for the 29 record, please. 30 MR. GALLAGHER: Matthew Gallagher from 31 the office of the attorney general, also on 32 behalf of Superintendent James 33 Some general instructions to make sure that this runs 34 as efficiently as possible. Make sure that we're 35 that wall understand that this is just a simple 40 the attorneys to note their appearance for the 41 record, please. 42	8		8	THE REPORTER: Thank you. The witness
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	25		25	
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1	Higbie v James, et al – 10-18-24 – Michael Veotruba	1	Higbie v James, et al – 10-18-24 – Michael Veotruba
2	will give you the same courtesy when answering. Does	2	Q. Sir, what is your date of birth?
3	that make sense?	3	A. November 16th, 1988.
4	A. Yes, sir.	4	Q. Where do you currently live?
5	Q. Okay. And along with the	5	A. 1003 Cascade Street, Pittsfield,
6	along with that notion, all of your responses today	6	Massachusetts.
7	need to be verbal, so you need to say yes or no. The	7	Q. How long have you lived there?
8	court reporter can't take down shoulder shrugs, head	8	A. Four years. Little over.
9	nods, uh-huh, huh-uh. So I just ask that you give	9	Q. Okay. How long have you lived in
10	verbal responses. Does that make sense?	10	Massachusetts?
11	A. Yes, sir.	11	A. Thirteen and a half years.
12	Q. Excellent. If you need a break	12	Q. Has that been the past thirteen
13	at any point in time, please let me know. I don't	13	years continuously?
14	expect us to go very long today, but if you need a	14	A. No, sir. There was a small stint
15	break, I'll be happy to give you one for whatever	15	where I lived in California.
16	reason, I just ask that if there is a question	16	Q. Okay. When did you live in
17	pending, you answer the question before we take the	17	California?
18	break. Does that make sense?	18	A. October 2014 to March 2015.
19			
	A. Yes, sir.	19	Q. Have you have you ever lived
20	Q. Okay. Is there any reason that	20	in New York State?
21	you would not be able to understand my questions and	21	A. No, sir.
22	answer them truthfully today?	22	Q. What's the highest level of
23	A. No, sir.	23	formal education that you completed?
24	Q. Did you do anything to prepare	24	A. I have a master's degree.
25	for this deposition?	25	Q. And where did you where
	1		4
	Page 13		Page 15
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- 4			•
1 2	Higbie v James, et al – 10-18-24 – Michael Veotruba	1 2	Higbie v James, et al – 10-18-24 – Michael Veotruba
2	A. No, sir.	2	Higbie v James, et al – 10-18-24 – Michael Veotruba from where did you obtain that Master's degree.
2 3	A. No, sir. Q. Okay. Did you so you didn't	2	Higbie v James, et al – 10-18-24 – Michael Veotruba from where did you obtain that Master's degree. A. Penn State.
2 3 4	A. No, sir. Q. Okay. Did you so you didn't review any any documents?	2 3 4	Higbie v James, et al – 10-18-24 – Michael Veotruba from where did you obtain that Master's degree. A. Penn State. Q. When did you obtain that?
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1	Higbie v James, et al – 10-18-24 – Michael Veotruba	1	Higbie v James, et al – 10-18-24 – Michael Veotruba
2	for a department of around twenty systems engineers.	2	of what was necessary to join?
3	Q. Okay. Can you explain what that	3	A. Yes, sir.
4	is in layman's terms?	4	Q. Okay. There were no training
5	A. I design technology refreshes for	5	requirements?
6	the Ohio Vanguard Columbia and Dreadnought Class	6	A. No, sir.
7	Submarines.	7	Q. How about previous to that, were
8	Q. Do you have any military	8	you a member of any other gun or rifle association?
9	experience?	9	A. No, sir.
10	A. No, sir.	10	Q. Sir, have you ever been arrested?
11	Q. How long have you been with	11	A. No, sir.
12	General Dynamics?	12	Q. Ever been convicted of a crime?
13	A. I just had my thirteenth service	13	A. No, sir.
14	anniversary.	14	Q. Ever charged with a crime?
15	Q. Oh, congrats.	15	A. I had an instance in South
16	A. Thank you.	16	Carolina where I was given a fine. I don't know if
17	Q. Do you have any affiliations or	17	that counts.
18	memberships with any gun or rifle associations?	18	Q. Okay. What what was the fine
19	A. I am a member, I believe it's	19	for?
			A. Possession of alcohol on a beach.
20 21	still active, for GOAL, the Gun Owners Action League. I think that's the the primary one in	20 21	A. Possession of alcohol on a beach. Q. Did anything ever come
	• •	22	
22	Massachusetts.		anything ever come of that? Did you pay it? Did you
23	Q. And what do you mean when you say	23	did you defend it?
24	the primary one in Massachusetts?	24	A. I was told that that I would
25	A. It's the only one I've ever heard	25	receive something in the mail for like a summons
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1	Higbie v James, et al – 10-18-24 – Michael Veotruba	1	Higbie v James, et al – 10-18-24 – Michael Veotruba
2	some documents along with some discovery requests in	2	A. No, sir.
3	this case, including some copies of your licenses.	3	Q. Okay. And following the 2013
4	I'm going to share those with you now and ask you	4	license, it looks like you have one that was issued
5	some questions about those.	5	in 2017 and one in 2023. What is the reason for the
6	A. Yes, sir.	6	issuance of the subsequent two licenses?
	· · · · · · · · · · · · · · · · · · ·		
7	Q. I'm going to pull them up I'm	7	A. In Massachusetts, they are only
8	going to pull them up on the screen. Just let me	8	good for what the state says is five years. Said it
9	know when you can see them.	9	can shift depending on when your birthday and when
10	A. I can see them.	10	your application is and you have to redo the whole
11	Q. Okay. And I'll represent to you	11	process.
12	there are three pages here. I'll scroll through them	12	Q. Okay. Let's let's talk about
13	slowly. They're Bates numbered Veotruba underscore	13	that process. So was the either 2012 or 2013 the
14	zero zero one through zero zero three. Do you	14	fir the first time that you obtained a carry
15	recognize these documents?	15	license in Massachusetts?
16	A. Yes, sir.	16	A. Yes, sir.
17	Q. Okay. And what do you recognize	17	Q. Okay. And how did what was
18	them to be?	18	the application what were the application
19		19	requirements in obtaining that license?
20	A. I have a my current L.T.C. on there was the final image.	20	A. You needed a classroom like a
	_		
21	Q. Okay.	21	an approved classroom session for the training in
22	A. The one above that is a	22	which that's when I completed an eight hour in-person
23	screenshot from my cell phone documenting my attempts	23	with live fire training at at the Smith and Wesson
24	to contact an authority figure in New York State in	24	factory in Springfield, Massachusetts. I think it
25	regards to obtaining a New York State license to	25	was Springfield. They're no longer open, but after
	Page 21		Page 23
800-523-		800-523	-
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Associate	7887 ARII@courtsteno.com		ted Reporters Int'l., Inc. www.courtsteno.com Higbie v James, et al – 10-18-24 – Michael Veotruba
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2	Q. And you had mentioned the D I	2	through the whole process again for renewal. Is that
3	apologize if I screw this up. The D.C.I.J.S., was	3	the case?
4	that was that the investigating branch of that	4	A. So for Adams, I did enter I
5	application process?	5	did sit directly with the deputy both times,
6	A. I truly have no idea what that	6	Pittsfield, however, much bigger and they did theirs
7	department is or does. I just know that's where the	7	a little differently. I had to just drop off the
8	application goes to.	8	application with a money order paid to the state
9	Q. Do you know if a background check	9	police. And then they then they sent me mail when
10	was completed as part of the application process?	10	they said I can come pick up my license. It was
11		11	there was almost no contact with law enforcement when
	A. I was told so, yes.	12	
12	Q. Okay. Who told you?		I renewed in Pittsfield.
13	A. The deputy that I interviewed	13	Q. Did you have to take another
14	with.	14	eight-hour training course when you renew?
15	Q. What part in what part of the	15	A. No, sir.
16	process were you interviewed?	16	Q. Are you do you have any
17	A. So you can print out the	17	understanding or familiarity with the application
18	application online for for the L.T.C. That's just	18	requirements in New York State to obtain a carry
19	something you can find off the state website or the	19	permit?
20	town website sometimes also has it. And then I went	20	A. Only a few snippets from the news
21	through and I filled it out and made sure I had my	21	that I have heard recently.
22	references and addresses and and all that pretty	22	Q. Okay. Do you know I'm sorry,
23	standard stuff. You then just walk into the police	23	go ahead.
24	department and if they've got someone available,	24	A. That that was sorry. It
25	they'll do it right there on the spot. Adams was a	25	was very vague. It it, you know, I heard that
23	they it do it right there on the spot. Adams was a	23	was very vague. It it, you know, I heard that
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does Class A large capacity signify on the license? A. This I believe has been recently re-categorized, but Class A large capacity accounts for any gun, I believe, that is capable of accepting a detachable magazine of over ten rounds. I believe that's the definition. Q. Do you know if Massachusetts sissues licenses that are either less than or greater than a Class A large capacity? A. Yes, A. Yes, A. Yes, A. Yes, A. Yes, A. So s A. So s Competitions, as w A. B, C, and D, where B did not account for the large capacity element, you know, then Class C and D, I A. So the capacity interrogatories that are interrogatories than a show them to you show them to you the the 2012 or 2 interrogatories than a show them to you the the 2012 or 2 interrogatories that the the 2012 or 2 interrogatories t	1 – 10-18-24 – Michael Veotruba It were produced, and again, I can if if you need to see them, but 2013 license that you had had a rting purposes only. Is that It, sir. It was an again, I can if if you need to see them, but 2013 license that you had had a rting purposes only. Is that It was a graph of the service
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la transfer to the transfer last the second con-	the Town of Adams had an
14 believe, were in regards to any pistol and maybe 14 unofficial standing	g policy that the first license to
15 pepper spray. I honestly don't remember the 15 carry issued to any	y resident of the town would be
	of sporting or hunting or what
	ategories. And upon completion of
	five years or so for your license,
	sues that you had with law
	would then renew your license for
	d did the sporting purposes
	low you to have guns in your home
24 A. Yes, sir. 24 for self-defense?	
25 Q. And again, just for the record, 25 A. Yes,	, sir.
Page 29	Page 31
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	al – 10-18-24 – Michael Veotruba
	d just one more question on
	correct to assume that the
	ess on the bottom is just an update
5 Q. So when so in order to obtain 5 to the license because	ause you moved?
6 the Class A large capacity, was that something that 6 A. Yes	
7 you had to specifically select on the on the 7 Q. Nov	w, directing your attention to
8 application? 8 the third page of I	Exhibit One, can you see your
9 A. I believe so. 9 current license iss	sued in 2023 that expires in 2029?
10 Q. It's okay if you don't remember. 10 A. Yes	_
	ay. Do you see where it says
12 A. I don't remember. No, sir. 12 restrictions, none	
13 Q. Going down about halfway down, do 13 A. Yes	
	y did it if you know, why
	n all legal or all lawful purposes
, , , , , , , , , , , , , , , , , , ,	
	o not know.
	ay. So you didn't achieve a
	or something like that in different
20 several categories basically at the discretion of the 20 part of your life, s	
21 chief of police. They can restrict your license to 21 A. No,	
22 carry and all-off full purpose means there are no 22 Q th	here are no restrictions on
23 restrictions outside of what is just outlined in the 23 you?	
24 Mass General Law. 24 A. No,	, sir.
25 Q. And referring back to the 25 Q. Oka	
Dago 20	D-~- 20
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17 O. Has any - have - has the status of your licenses ever been affected by something you did or did not do? 19		ated Reporters Int'l., Inc. www.courtsteno.com	Associa	ted Reporters Int'l., Inc. www.courtsteno.com
3 A. Somewhat not — not specifically, 4 or carry permits in any other states? 5 A. No, sir. 6 Q. Okay. Have you ever applied for 7 a license in any other state? 8 A. No, sir. 9 Q. Have you ever applied for a 10 license in missacchusetts and been denied? 11 A. No, sir. 12 Q. Has your Massacchusetts and been denied? 12 ever been suspended? 13 A. No, sir. 14 Q. Has it ever been revoked? 15 Q. Has it ever been revoked? 16 A. No, sir. 17 Q. Has it ever been revoked? 18 of your licenses ever been affected by something you did or did not do? 18 of your licenses verbe en affected by something you did or did not do? 20 A. No, sir. 19 Q. Imaging to take this down for the time being. 21 Q. Imaging to take this down for questions specifically about this lawouit. Why— 22 why are you suing New York State? 23 Sir. I just want to ask you some questions specifically about this lawouit. Why— 25 why are you using New York State? 26 A. Iwanted to apply for a firearms license in Massacchusetts and hot nive the right to apply. 27 Q. Why do you want a New York 28 license? 29 A. I live extremely close to New York 20 Q. Why do you want a New York 21 Image. 22 A. It is a fire the program of the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my house is configuous into the state forest behind my hou	1	Higbie v James, et al – 10-18-24 – Michael Veotruba	1	Higbie v James, et al – 10-18-24 – Michael Veotruba
4 except where I frequently recruit - well, frequently recruit - well, frequently. Our company frequently recruited at R.P.J. once though personally. And then If I have to fly for a have flow and the personal personal flow and then I have to fly for though personally. And then If I have to fly for a have flow and the flow personal flow and the flow personal flow and the	2	A. No, sir.	2	Did your job ever take you to New York State?
5 A. No, sir. 10 Has your Massachusetts and been denice? 11 A. No, sir. 12 Q. Has your Massachusetts incense ceve been suspended? 13 cever been suspended? 14 A. No, sir. 15 Q. Has it ever been revoked? 16 A. No, sir. 17 Q. Has it ever been revoked? 18 of your licenses ever been affected by something you did or did not do? 19 Q. Has only - have - has the status of your licenses ever been affected by something you did or did not do? 19 Q. In poing to take this down for the time being. 20 A. No, sir. 21 Q. In going to take this down for the time being. 22 G. D. In going to take this down for the time being. 23 Sir, I just want to ask you some 24 questions specifically about this lawuit. Why - why are you suing New York State? 24 Questions specifically about this lawuit. Why - why are you suing New York State? 25 Why are you want a New York 3 State license, and I was told that I did not have the right to apply. 5 Q. Why do you want a New York 8 license? 10 Q. Why do you want a New York 11 reasons. 12 Q. Why do you want a New York 13 State license, and I was told that I did not have the right to apply. 5 Q. Why to you want a New York 16 A. I live extremely close to New 17 Q. Why do you want a New York 18 license? 19 A. I live extremely close to New 10 York and I frequent New York For a multitude of farm implements. I have - some of my betwork of the farm implements of the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is	3	Q. Do you hold any pistol licenses	3	A. Somewhat not not specifically,
5 A. No, sir. 6 Q. Okay. Have you ever applied for a license in any other state? 7 a license in any other state? 8 A. No, sir. 9 Q. Have you ever applied for a license in any other state? 10 license in Massachusetts and been denied? 11 A. No, sir. 12 Q. Has your Massachusetts license ever been suspended? 13 ever been suspended? 14 A. No, sir. 15 Q. Has it ever been revoked? 16 A. No, sir. 17 Q. Has any - have - has the status of your licenses ever been affected by something you did or did not do? 18 of your licenses ever been affected by something you did or did not do? 19 A. No, sir. 20 A. No, sir. 21 Q. In going to take this down for the time being. 22 A. No, sir. 23 Sir, Jipst want to ask you some your your work your work of the time being. 24 questions specifically about this lawait. Why - why are you suing New York State? 25 why are you suing New York State? 26 A. I wanted to apply for a New York 3 State license, and I was told that I did not have the right to apply. 27 Q. Why do you want a New York 3 State license, and I was told that I did not have the right to apply. 28 A. I live extremely close to New York 3 State license, and I was told that I did not have the right to apply. 3 A. I live extremely close to New York 4 Pope State license, and I was told that I did not have the right to apply. 4 York and I frequent New York for a multitude of row York with winding and hunting, and the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state forest behind my house is contiguous into the state f	4		4	except where I frequently recruit well,
6 Q. Okay. Have you ever applied for 7 a license in any other state? 8 A. No, sir. 9 Q. Have you ever applied for 8 10 license in Massachusetts and been denied? 10 license in Massachusetts and been denied? 11 A. No, sir. 12 Q. Have you ever applied for a 12 State? 13 ever been suspended? 12 State? 13 A. No, sir. 14 A. No, sir. 15 Q. Has it ever been revoked? 14 A. No, sir. 16 A. No, sir. 17 Q. Has it ever been revoked? 16 A. No, sir. 17 Q. Has it ever been revoked? 17 Q. Has it ever been revoked? 18 A. No, sir. 18 Q. Has any – have – has the status 18 of your licenses ever been affected by something you 18 do of did not do? 19 A. No, sir. 19 did or did not do? 19 A. No, sir. 19 did or did not do? 19 A. No, sir. 19 did or did not do? 19 A. No, sir. 19 did or did not do? 19 A. No, sir. 19 did or did not do? 19 A. No, sir. 19 did or did not do? 19 A. No, sir. 19 did or did not do? 19 A. No, sir. 19 did or did not do? 19 A. No, sir. 19 did or did not do? 19 A. No, sir. 19 Q. I'm going to take this down for 19 the time being. 19 did or did not do? 19 A. No, sir. 19 Q. I'm going to take this down for 19 did not do? 19 A. No, sir. 19 Q. I'm going to take this down for 19 did not do? 19 A. No, sir. 19 Q. I'm going to take this down for 19 did not do? 19 A. No, sir. 19 Q. I'm going to take this down for 19 A. No, sir. 19 Q. I'm going to take this down for 19 A. No, sir. 19 Q. I'm going to take this down for 19 A. No, sir. 19 Q. I'm going to take this down for 19 A. No, sir. 19 Q. I'm going to take this down for 19 Q. I'm going to take this down for 19 Q. I'm going to take this down for 19 Q. I'm going to take this down for 19 Q. I'm going to take this down for 19 Q. I'm going to take this down for 19 Q. I'm going to take this down for 19 Q. I'm going to take this down for 19 Q. I'm going to take this down for 19 Q. I'm going to take this down for 19 Q. I'm going to take this down for 19 Q. I'm going to take this down for 19 Q. I'm going to take this down for 19 Q. I'm going to take this down for 19 Q. I'm going to take	5		5	
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	10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	York and I frequent New York for a multitude of reasons. Q. Why do you visit New York? A. I firstly, I spend a lot of time hike both hiking and hunting, and the state forest behind my house is contiguous into the state of New York without crossing through any other sort of barriers. So having that sort of coverage would be beneficial. I frequent there's a Steward's Gas Station in New Lebanon that sells fuel that does not contain any ethanol, which I like to store up for my multitude of farm implements. I have some of my best friends live between Troy and Columbia County so frequently just visiting their homes and and their lake houses. So those are the the big reasons. Q. Did you ever work in New York?	10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	confirmed when I called the Sheriff Bourgault. Q. Why did you call Sheriff Bourgault? A. So he is the sheriff of Rensselaer County, I believe. I I tend to get Columbia and Rensselaer a little swapped. I'm in them both frequently. Those are the the two towns that border the entire western border of Massachusetts, and those are the two towns that I am most frequently in and most most familiar with. Q. Do you recall when you called the Rensselaer County Sheriff's Office and spoke with Sheriff Bourgault? A. It would've been around the time that with the timestamps on that screenshot as part of Exhibit A. Page 36

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1 Higbie v James, et al – 10-18-24 – Michael Veotruba	1 Higbie v James, et al – 10-18-24 – Michael Veotruba
Q. So late 2023? Would that be	2 A. I don't remember.
3 fair?	3 Q. And it looks like you attempted
4 A. Yes, sir.	4 to call the New York State Police three times; is
5 Q. What was what was said on your	5 that fair?
6 call with Sheriff Bourgault?	6 A. Yes, sir.
7 A. I asked what is the application	7 Q. Okay. And why did you not try
8 process for an out-of-state resident who, you know,	8 after three attempts any further?
9 happens to live in Pittsfield. And he was very	9 A. At at that point, it just
deeply apologetic, very nice, and he said, no,	the phone tree didn't seem responsive. It frequently
unfortunately, you it requires that you that	11 if I remember right, it would just drop you. I
12 you are a resident or or work here. And that was	think it put me on hold and then it just cut me off.
it. And then, you know, he apologized. He I	13 Q. Besides the Rensselaer County
think he if I could quote him, he said I know you	,
live so close; you can probably taste it. And then I	15 you attempt to call anyone else or any other entity
said, you know, thank you. And and I hung up.	in New York to inquire about the permitting
Q. Can you recall anything else that	17 requirements?
was said by either you or him on that call?	18 A. No, sir.
19 A. That was it.	19 Q. How did you come to be involved
Q. Okay. Approximately how long did	20 in this lawsuit?
21 that call last, if you remember?	A. I was watching a video from a
A. Thirty seconds, maybe.	22 YouTube channel called Guns and Gadgets. I like that
Q. Did you call any other county	23 channel. And it was brought up in the video that
24 sheriff's offices to inquire about obtaining a	24 they would like to talk to anyone who was looking for
25 license in New York?	25 a New York carry license who lived in the state of
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1 Higbie v James, et al – 10-18-24 – Michael Veotruba	1 Higbie v James, et al – 10-18-24 – Michael Veotruba
2 A. No, sir.	2 Massachusetts.
3 Q. Okay. Why not?	3 Q. Did somebody send you that video
4 A. He made it clear that that was a	4 or did you find it on your own?
5 state law.	5 A. I found that on my own.
6 Q. What did he say, if you recall,	6 Q. And and so who did so
7 regarding that specifically?	7 having watched that video, who did you contact?
8 A. He said New York does not allow	8 A. Who I assume is the host of said
9 that. Not that it not that just Rensselaer, it	9 podcast, if you would call it, Jared. It was
was not a town specific thing, it was a state thing.	10 jared@gunsandgadgets.com or something like that.
11 Q. Did somebody tell you to call	Q. Was it did did you send him
12 Rensselaer County or did you do that on your own	12 an email?
13 volition?	A. Yes, I shot him an email with my
14 A. I called on my own volition.	14 information.
15 Q. And we talked earlier when we	15 Q. Okay. And did you receive
16 looked at Exhibit One, one of the pages there showed	16 something back from him?
a call log from your cell phone of of when you	17 A. Clarifying, because I I didn't
18 attempted to call the New York State Police. Is that	18 answer his email accurately the first time. I think
19 correct?	19 I forgot to put my address or something of that
20 A. Yes, sir.	20 nature, but so he had responded with clarification of
21 Q. Okay. Did you ever get through	21 my information, I responded with said clarification,
22 to anyone at the New York State Police?	22 and that was it.
23 A. No, sir.	
· · · · · · · · · · · · · · · · · · ·	1
24 Q. Okay. Did you leave a did you 25 did you have an opportunity to leave a message?	
25 did you have an opportunity to leave a message?	25 information from you when he responded to your
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1	Higbie v James, et al – 10-18-24 – Michael Veotruba	1	Higbie v James, et al – 10-18-24 – Michael Veotr	uba
2	initial email?	2	Q. Okay. Are you a fugitive from	
3	A. No, sir.	3	justice?	
4	Q. And then what happened after your	4	A. No, sir.	
5	exchange with that individual?	5	Q. Do you use any illegal drugs?	
6	A. I want to say a couple of days, a	6	A. No, sir.	
7	week or so later Mr. Stamboulieh reached out to me.	7	Q. Do you use pot?	
8	Q. Sir, do you know how this lawsuit		A. No, sir.	
9		8		1
	is being funded?	9	Q. Have you ever suffered any menta	aı
10	A. I do not.	10	illness?	
11	Q. Okay. Are you paying your	11	A. No, sir.	
12	attorney for this lawsuit?	12	Q. Have you ever been committed or	r
13	A. No, sir.	13	spent time in a mental health institution?	
14	Q. Okay. Do you know if it's if	14	A. No, sir.	
15	the lawsuit was brought by the Gun Owners of America?	15	 Q. Have you ever had any 	
16	A. I do not know.	16	professional license revoked?	
17	Q. Okay. Do you have any	17	A. No, sir.	
18	association with the Gun Owners of America?	18	Q. Have you ever had a driver's	
19	A. No, sir.	19	license revoked?	
20	Q. Have they ever contacted you or	20	A. No, sir.	
21	have you ever contacted them?	21	Q. Have you ever had a guardian	
22	A. No, sir.	22	appointed to manage your affairs?	
23	Q. Okay. Next, I'd like to ask you,	23	A. No, sir.	
			*	
24	I'm just going to ask you a series of questions that	2.4	Q. Never been convicted of an	
25	that I need to ask that are associated with New	25	assault, correct?	
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1	Higbie v James, et al – 10-18-24 – Michael Veotruba	1	Higbie v James, et al – 10-18-24 – Michael Veotrub	
2	York licensing requirement. Please don't take any of		=	а
2		2	A. No, sir.	а
3	these personal. We'll we can probably get through	3	=	а
3 4			A. No, sir.	a
	these personal. We'll we can probably get through	3	A. No, sir.Q. Okay. Convicted of D.U.I.?	a
4	these personal. We'll we can probably get through them pretty quickly, but I'm just going to run down	3 4 5	A. No, sir.Q. Okay. Convicted of D.U.I.?A. No, sir.Q. Okay. Would you be able and	
4 5	these personal. We'll we can probably get through them pretty quickly, but I'm just going to run down the list. Are you a United States citizen? A. Yes, sir.	3 4 5 6	 A. No, sir. Q. Okay. Convicted of D.U.I.? A. No, sir. Q. Okay. Would you be able and willing to submit the information required in the N 	New
4 5 6 7	these personal. We'll we can probably get through them pretty quickly, but I'm just going to run down the list. Are you a United States citizen? A. Yes, sir. Q. Okay. Have you ever been	3 4 5 6 7	 A. No, sir. Q. Okay. Convicted of D.U.I.? A. No, sir. Q. Okay. Would you be able and willing to submit the information required in the N York State Firearms permitting application, such as the submit of t	New as
4 5 6 7 8	these personal. We'll we can probably get through them pretty quickly, but I'm just going to run down the list. Are you a United States citizen? A. Yes, sir. Q. Okay. Have you ever been convicted anywhere of a felony or serious offense?	3 4 5 6 7 8	A. No, sir. Q. Okay. Convicted of D.U.I.? A. No, sir. Q. Okay. Would you be able and willing to submit the information required in the York State Firearms permitting application, such the name of your spouse and any other adults residual.	New as
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1	Higbie v James, et al – 10-18-24 – Michael Veotruba	1	Higbie v James, et al – 10-18-24 – Michael Veotruba
2	A. If I could like, choose a person,	2	Q. As you sit here today, do you
3	and said, person spouse. And that's not like a	3	know whether or not any of the other counties in New
4	double dipping situation where like a husband and a	4	York State other than Rensselaer accept applications
5	wife, yes, sir.	5	from non-residents, non-New York residents?
6	Q. Okay. And how about would you be	6	A. Could you repeat the question?
7	able to come up with four character references if	7	Q. Sure. Do you do you know
	•		whether or not any other counties in New York State
8	they did not have to be New York State residents?	8	
9	A. Yes, sir.	9	other than Rensselaer accept permit applications from
10	Q. Okay. Is there any reason to	10	non-residents?
11	think that you would use a weapon in any way that	11	A. I do not know for certain, no.
12	would endanger yourself or others?	12	Q. Have you ever been told that the
13	A. No, sir.	13	other sixty-one or that the other approximate sixty-
14	Q. Okay. Have you ever been present	14	one counties besides Rensselaer, would not accept an
15	for an incident where someone was shot or injured	15	application from a non-resident?
16	with a weapon?	16	A. It was implied by Mr. Bourgault's
17	A. No, sir.	17	statement that it was a New York State policy.
18	Q. Thank you. This next question is	18	Q. If New York City was accepting
19	just for posterity's sake. You are not a retired	19	licenses from non-residents, would you consider
20	member of the New York State Police, correct?	20	applying there?
21		21	A. Probably not. No.
	A. No, sir.		
22	Q. Are you actively trying to obtain	22	Q. Okay. Why not?
23	a license in any other state besides New York?	23	A. I've I've never been to New
24	A. No, sir.	24	York City. I don't particularly care to go there.
25	Q. And I know based on our prior	25	Q. If New York City issued permits
	D 45		D 47
	Page 45		Page 47
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1 2 3	Higbie v James, et al – 10-18-24 – Michael Veotruba conversation that you were informed by Sheriff Bourgault that you could not apply in New York, but	1 2 3	Higbie v James, et al – 10-18-24 – Michael Veotruba that were for non-residents that applied to New York City as well as the rest of the state, would that
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1 Higbie v James, et al – 10-18-24 – Michael Veotruba	1 Higbie v James, et al – 10-18-24 – Michael Veotruba
2 A. I I that would make my life	2 because if it was you, it looks like you're doing
3 the easiest. But I understand that, you know, states	3 well and it wasn't an issue and
4 have the right to establish their own licensing	4 A. Yeah, no, I'm I'm okay. Thank
5 schemes.	5 you.
Q. So if you were able to apply for	6 Q. Okay. The individual needed like
	7 seven rabies shots or something like that, so.
a license in New York, that would be sufficient for	8 MR. GALLAGHER: Okay. I don't have
8 what you attempt to achieve in this lawsuit. Is that	9 any further questions. Thank you for your time
9 fair to say?	
10 A. Yes, sir.	10 today. Ms. Fitzsimmons may have some questions for
Q. Sir, do you know any of the other	you, but otherwise we appreciate you being here and
plaintiffs in this lawsuit personally?	12 taking the time in speaking with us today.
13 A. No, sir.	13 THE WITNESS: Yes, sir. Thank you.
Q. Have you ever spoken with them?	14 MS. FITZSIMMONS: I do not have any
15 A. No, sir.	15 questions for you today. Thank you for
16 MR. GALLAGHER: Can I can we just	16 participating,
take five five minutes? I think I'm hoping I'm	17 MS. STAMBOULICH: And I don't have any
just about done. That that went rather quickly,	18 questions either. But Mr. Veotruba, you have an
but if we could just take a quick five-minute break	
and come back and I'll wrap things up.	opportunity, you have a right to read and sign the
21 MS. STAMBOULICH: Okay.	deposition and make sure that the court reporter
22 MR. GALLAGHER: Thank you.	21 transcribed your answers accurately. It's totally up
23 (Recess taken at 1:49 p.m.)	22 to you whether or not you want to exercise that
	23 right. You can waive it. It's not a big deal, but
,	24 if you want to read and sign the deposition, you have
THE REPORTER: We're on the record.	25 to invoke that right to do so. Would you like to
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1 Higbie v James, et al – 10-18-24 – Michael Veotruba	1 Higbie v James, et al – 10-18-24 – Michael Veotruba
2 MR. GALLAGHER: Just a few more	2 read and sign?
3 questions, Ms. Veotruba.	3 THE WITNESS: I don't think so. No.
4 BY MR. GALLAGHER: (Cont'g.)	4 I I'd be willing to waive that right.
5 Q. Would it surprise you to know	5 MS. STAMBOULICH: Perfect.
6 that New York allows for licenses to be issued to a	6 MR. GALLAGHER: Okay. Thank you so
7 non-citizen or to a person not a citizen of and	7 much, Mr. Veotruba. We appreciate it. Have a good
8 usually a resident of New York State?	8 rest of your day and and have a nice weekend.
9 A. Yes, I would find that	9 THE WITNESS: Same to you.
10 surprising.	10 (The deposition concluded at 1:53
Q. All right. Does that describe	11 p.m.)
12 you?	12
13 A. As a non-resident, I don't want	13
14 to say non-citizen.	14
Q. Okay. Okay. As a non-resident	15
just, just one last question and I have to admit, I	16
did a Google search of you in preparation for this.	17
Were you were you attacked by a Bobcat in 2014?	18
19 A. No. That was a that's a funny	19
20 story though. There is even another Michael Veotruba	
	20
	21
in Massachusetts apparently.	
 in Massachusetts apparently. Q. Okay. Okay. 	22
 in Massachusetts apparently. Q. Okay. Okay. A. I know exactly of the article. 	22 23
in Massachusetts apparently. Q. Okay. Okay.	
 in Massachusetts apparently. Q. Okay. Okay. A. I know exactly of the article. 	23
21 in Massachusetts apparently. 22 Q. Okay. Okay. 23 A. I know exactly of the article. 24 It got sent around work. It was a good time. 25 Q. Okay. Okay. Because it	23 24 25
 in Massachusetts apparently. Q. Okay. Okay. A. I know exactly of the article. It got sent around work. It was a good time. 	23 24 25 Page 52

Higher v James, et al. 10-18-24 - Michael Veotruba 2 STYTEOP 3 CONSTY 4 CONSTY Of) 3 L MCHAEL VEOTRUBA, have read the foregoing record of any testimony takes at the time and place noted of the property of the same. 5 (Please check one) 4 That it is a true and correct transcript of same. 5 (With the exceptions noted in the attached errats aftered, it is a time and correct transcript of same. 6 MICHAEL VEOTRUBA 10 Novem to before rea this mand of the same and of the same and or the same and the same and or the same and the same and or the same and or the same and the care and the same and or the same and or the same and or the same and or the same and or the same and the same and or the same and the same and or the same and or the same and or the same and o	Associated Reporters Int'l., Inc. www.courtsteno.com	Associated Reporters Int'l., Inc. www.courtsteno.com
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