

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>Higbie v James, et al – 10-18-24 – Michael Veotruba UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK CARL HIGBIE, JOSEPH HARRIS, and MICHAEL VEOTRUBA, Plaintiffs, V Index No.: 24-CV-0174 MAD/TWD STEVEN G. JAMES, in his Official Capacity as Superintendent of the New York State Police, SHERIFF KYLE BOURGAULT, in his Official Capacity as the Sheriff of Rensselaer County, New York, SHERIFF DONALD J. KRAPF, in his Official Capacity as the Sheriff of Columbia, New York, and JOHN DOES 1-10, Defendants.</p> <p style="text-align: center;">X</p> <p>DEPOSITION OF: MICHAEL VEOTRUBA DATE: October 18, 2024 TIME: 1:01 p.m. to 1:53 p.m. VENUE: Microsoft Teams</p> <p>Reported by Annette Lainson</p> <p style="text-align: right;">Page 1</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 INDEX OF PROCEEDINGS 3 MICHAEL VEOTRUBA; Sworn 4 Direct Examination by Mr. Gallagher 11 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 3</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 APPEARANCES: 3 FOR THE PLAINTIFFS: 4 STAMBOULIEH LAW, PLLC 5 BY: STEPHEN STAMBOULIEH, ESQ. 6 417 Spike Ridge 7 Canton, Mississippi 39046 8 FOR STEVEN G. JAMES: 9 OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL 10 BY: MATTHEW GALLAGHER, A.A.G. 11 JAMES THOMPSON, A.A.G. 12 The Capitol 13 Albany, New York 12224 14 FOR DONALD J. KRAPF: 15 COLUMBIA COUNTY NEW YORK 16 BY: ROB FITZSIMMONS, ESQ. 17 402 State Street 18 Hudson, New York 12534 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 2</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 EXHIBIT INDEX 3 Marked as 4 Described as 5 One 22 6 Current license to carry, screenshot from cellphone, 7 License to carry (3 pages) 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 4</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba</p> <p>2 STIPULATIONS</p> <p>3 IT IS HEREBY STIPULATED AND AGREED by</p> <p>4 and between counsel for the respective parties hereto</p> <p>5 that:</p> <p>6 All rights provided by the Civil</p> <p>7 Practice Law and Rules, including the right to object</p> <p>8 to any question, except as to form, or to move to</p> <p>9 strike any testimony at this examination is reserved.</p> <p>10 And, in addition, the failure to object to any</p> <p>11 question or to move to strike testimony at this</p> <p>12 examination shall not be a bar or waiver to make such</p> <p>13 motion at, and is reserved for the trial of this</p> <p>14 action;</p> <p>15 IT IS FURTHER STIPULATED AND AGREED by</p> <p>16 and between counsel for the respective parties</p> <p>17 hereto, that this examination may be sworn to by the</p> <p>18 witness being examined before a Notary Public, other</p> <p>19 than the Notary Public before whom this examination</p> <p>20 was begun, but the failure to do so, or to return the</p> <p>21 original of this examination to counsel, shall not be</p> <p>22 deemed a waiver of the rights provided by Rule 3116</p> <p>23 and 3117 of the Civil Practice Law and Rules, and</p> <p>24 shall be controlled thereby;</p> <p>25 IT IS FURTHER STIPULATED AND AGREED by</p> <p>Page 5</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba</p> <p>2 be a bar or waiver to make such motion at, and is</p> <p>3 reserved to, the trial of this action.</p> <p>4 IT IS HEREBY STIPULATED AND AGREED by</p> <p>5 and between counsel for all parties present that</p> <p>6 pursuant to CPLR section 3113(d) this deposition is</p> <p>7 to be conducted by video conference, that the court</p> <p>8 reporter, all counsel, and the witness are all in</p> <p>9 separate remote locations (except the witness and his</p> <p>10 counsel are in the same physical location) and</p> <p>11 participating via videoconference meeting under the</p> <p>12 control of Associated Reporters International, Inc.</p> <p>13 (ARII), that the officer administering the oath to</p> <p>14 the witness need not be in the place of the</p> <p>15 deposition and the witness shall be sworn in remotely</p> <p>16 by the court reporter after confirming the witness's</p> <p>17 identity, that this videoconference will not be</p> <p>18 recorded in any manner and that any recording without</p> <p>19 the express written consent of all parties shall be</p> <p>20 considered unauthorized, in violation of law, and</p> <p>21 shall not be used for any purpose in this litigation</p> <p>22 or otherwise.</p> <p>23 IT IS FURTHER STIPULATED that exhibits</p> <p>24 may be marked by the attorney presenting the exhibit</p> <p>25 to the witness, and that a copy of any exhibit</p> <p>Page 7</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba</p> <p>2 and between counsel for the respective parties</p> <p>3 hereto, that this examination may be utilized for all</p> <p>4 purposes as provided by the Civil Practice Law and</p> <p>5 Rules;</p> <p>6 IT IS FURTHER STIPULATED AND AGREED by</p> <p>7 and between counsel for the respective parties</p> <p>8 hereto, that the filing and certification of the</p> <p>9 original of this examination shall be, and the same</p> <p>10 hereby are waived;</p> <p>11 IT IS FURTHER STIPULATED AND AGREED by</p> <p>12 and between counsel for the respective parties</p> <p>13 hereto, that a copy of the within examination shall</p> <p>14 be furnished to counsel representing the witness</p> <p>15 testifying without charge;</p> <p>16 IT IS FURTHER STIPULATED AND AGREED by</p> <p>17 and between counsel for the respective parties</p> <p>18 hereto, that all rights provided by the Civil</p> <p>19 Practice Law and Rules, and Part 221 of the Uniform</p> <p>20 Rules for the Conduct of Depositions, including the</p> <p>21 right to object to any question, except as to form,</p> <p>22 or to move to strike any testimony at this</p> <p>23 examination, is reserved. And, in addition, the</p> <p>24 failure to object to any question, or to move to</p> <p>25 strike any testimony, at this examination, shall not</p> <p>Page 6</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba</p> <p>2 presented to a witness shall be e-mailed to or</p> <p>3 otherwise in possession of all counsel prior to any</p> <p>4 questioning of a witness regarding the exhibit in</p> <p>5 question. Unless otherwise agreed upon, all parties</p> <p>6 shall bear their own costs in the conduct of this</p> <p>7 deposition by video conference, notwithstanding the</p> <p>8 obligation by CPLR to supply a copy of the transcript</p> <p>9 to the deposed party by the taking party in civil</p> <p>10 litigation matters.</p> <p>11 CPLR § 3113 Conduct of Examination (d)</p> <p>12 states:</p> <p>13 (d) The parties may stipulate that a</p> <p>14 deposition be taken by telephone or other remote</p> <p>15 electronic means and that a party may participate</p> <p>16 electronically. The stipulation shall designate</p> <p>17 reasonable provisions to ensure that an accurate</p> <p>18 record of the deposition is generated, shall specify,</p> <p>19 if appropriate, reasonable provisions for the use of</p> <p>20 exhibits at the deposition; shall specify who must</p> <p>21 and who may physically be present at the deposition;</p> <p>22 and shall provide for any other provisions</p> <p>23 appropriate under the circumstances. Unless otherwise</p> <p>24 stipulated to by the parties, the officer</p> <p>25 administering the oath shall be physically present at</p> <p>Page 8</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 the place of the deposition and the additional costs 3 of conducting the deposition by telephonic or other 4 remote electronic means, such as telephone charges, 5 shall be borne by the party requesting that the 6 deposition be conducted by such means. 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>Page 9</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 WITNESS; MICHAEL VEOTRUBA; Sworn 3 THE REPORTER: Okay. You can put your 4 hand down. Could you please state and spell your 5 full name for the record, please? 6 THE WITNESS: Yes. Michael Veotruba, 7 M-I-C-H-A-E-L V-E-O-T-R-U-B-A. 8 THE REPORTER: Thank you. The witness 9 has been sworn. 10 MR. GALLAGHER: Thank you. 11 DIRECT EXAMINATION 12 BY MR. GALLAGHER: 13 Q. Good afternoon, Mr. Veotruba. My 14 name is Matthew Gallagher. I'm an attorney with the 15 Office of the Attorney General in New York. I 16 represent 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 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.</p> <p>Page 11</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 (The deposition commenced at 1:01 3 p.m.) 4 THE REPORTER: We are on the record. 5 Before I swear in the witness, if I could just get 6 the attorneys to note their appearance for the 7 record, please. 8 MR. GALLAGHER: Matthew Gallagher from 9 the office of the attorney general on behalf of 10 Steven James. 11 MS. THOMPSON: James Thompson. Also 12 from the office of the attorney general, also on 13 behalf of Superintendent James. 14 THE REPORTER: Thank you. 15 MS. STAMBOULIEH: Stephen Stamboulieh 16 on behalf of the plaintiffs. 17 MS. FITZSIMMONS: Robert Fitzsimmons, 18 Columbia County attorney on behalf of Defendant 19 Donald Krapf. 20 THE REPORTER: Thank you. 21 And if I could get you to raise your 22 right hand, please. Do you swear or affirm that the 23 testimony you're going to give will be the truth, the 24 whole truth, and nothing but the truth? 25 MS. VEOTRUBA: Yes.</p> <p>Page 10</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 Q. So I'm just going to start with 3 some general instructions to make sure that this runs 4 as efficiently as possible. Make sure that we're -- 5 that we all understand that this is just a simple 6 question and answer session. I'm going to answer, 7 ask you some questions. I just ask that you give 8 your answer to the best of your ability. I'm not 9 here to try to trick you today, so if you don't 10 understand one of my questions, please let me know 11 and I will ask it a different way or try to rephrase 12 it. If you do answer my question, it's going to be 13 understood that you understood the question in its 14 plainest terms and you answered it. Does that make 15 sense? 16 A. Yes, sir. 17 Q. You can see that we have a court 18 reporter here with us today. In order for her to 19 create a clean transcript, let's try not to talk over 20 each other. That's one of the most difficult things 21 in a deposition because in everyday life and 22 conversation, people know where the conversation's 23 going and they tend to step on each other's words. 24 So I just ask that you allow me to finish all of my 25 questions completely before you give an answer, and I</p> <p>Page 12</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba</p> <p>2 will give you the same courtesy when answering. Does</p> <p>3 that make sense?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Okay. And along with the --</p> <p>6 along with that notion, all of your responses today</p> <p>7 need to be verbal, so you need to say yes or no. The</p> <p>8 court reporter can't take down shoulder shrugs, head</p> <p>9 nods, uh-huh, huh-uh. So I just ask that you give</p> <p>10 verbal responses. Does that make sense?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Excellent. If you need a break</p> <p>13 at any point in time, please let me know. I don't</p> <p>14 expect us to go very long today, but if you need a</p> <p>15 break, I'll be happy to give you one for whatever</p> <p>16 reason, I just ask that if there is a question</p> <p>17 pending, you answer the question before we take the</p> <p>18 break. Does that make sense?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Okay. Is there any reason that</p> <p>21 you would not be able to understand my questions and</p> <p>22 answer them truthfully today?</p> <p>23 A. No, sir.</p> <p>24 Q. Did you do anything to prepare</p> <p>25 for this deposition?</p> <p>Page 13</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba</p> <p>2 Q. Sir, what is your date of birth?</p> <p>3 A. November 16th, 1988.</p> <p>4 Q. Where do you currently live?</p> <p>5 A. 1003 Cascade Street, Pittsfield,</p> <p>6 Massachusetts.</p> <p>7 Q. How long have you lived there?</p> <p>8 A. Four years. Little over.</p> <p>9 Q. Okay. How long have you lived in</p> <p>10 Massachusetts?</p> <p>11 A. Thirteen and a half years.</p> <p>12 Q. Has that been the past thirteen</p> <p>13 years continuously?</p> <p>14 A. No, sir. There was a small stint</p> <p>15 where I lived in California.</p> <p>16 Q. Okay. When did you live in</p> <p>17 California?</p> <p>18 A. October 2014 to March 2015.</p> <p>19 Q. Have you -- have you ever lived</p> <p>20 in New York State?</p> <p>21 A. No, sir.</p> <p>22 Q. What's the highest level of</p> <p>23 formal education that you completed?</p> <p>24 A. I have a master's degree.</p> <p>25 Q. And where did you -- where --</p> <p>Page 15</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba</p> <p>2 A. No, sir.</p> <p>3 Q. Okay. Did you -- so you didn't</p> <p>4 review any -- any documents?</p> <p>5 A. I've looked at my interrogatory,</p> <p>6 you know, complaints.</p> <p>7 Q. Any other documents that you can</p> <p>8 remember looking at?</p> <p>9 A. No, sir.</p> <p>10 Q. Okay. Did you speak with your</p> <p>11 attorney in preparation? And I don't want to know</p> <p>12 what you spoke to him about. I just want to know if</p> <p>13 you happen to speak with him in preparation.</p> <p>14 A. Yes, sir.</p> <p>15 Q. Okay. And did you speak with</p> <p>16 anyone else other than your attorney about this</p> <p>17 deposition today?</p> <p>18 A. No, sir.</p> <p>19 Q. Have you discussed this case with</p> <p>20 anyone other than your attorney at any point in time?</p> <p>21 A. No, sir.</p> <p>22 Q. And -- and does that include, you</p> <p>23 haven't discussed this case online with anyone or</p> <p>24 over social media?</p> <p>25 A. No, sir.</p> <p>Page 14</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba</p> <p>2 from where did you obtain that Master's degree.</p> <p>3 A. Penn State.</p> <p>4 Q. When did you obtain that?</p> <p>5 A. August 2014.</p> <p>6 Q. What is -- what is the master's</p> <p>7 in? What is the -- what is the concentration?</p> <p>8 A. Project management.</p> <p>9 Q. Okay. Where'd you go to</p> <p>10 undergrad?</p> <p>11 A. Virginia Tech.</p> <p>12 Q. And when did you graduate</p> <p>13 Virginia Tech?</p> <p>14 A. May 2011.</p> <p>15 Q. And what was your major?</p> <p>16 A. Economics.</p> <p>17 Q. Are you currently employed?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Where -- who are you employed by?</p> <p>20 A. General Dynamics Mission Systems.</p> <p>21 Q. And where's -- where's that</p> <p>22 office out of?</p> <p>23 A. Pittsfield, Massachusetts.</p> <p>24 Q. And what do you do there?</p> <p>25 A. I'm a systems engineering manager</p> <p>Page 16</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 for a department of around twenty systems engineers. 3 Q. Okay. Can you explain what that 4 is in layman's terms? 5 A. I design technology refreshes for 6 the Ohio Vanguard Columbia and Dreadnought Class 7 Submarines. 8 Q. Do you have any military 9 experience? 10 A. No, sir. 11 Q. How long have you been with 12 General Dynamics? 13 A. I just had my thirteenth service 14 anniversary. 15 Q. Oh, congrats. 16 A. Thank you. 17 Q. Do you have any affiliations or 18 memberships with any gun or rifle associations? 19 A. I am a member, I believe it's 20 still active, for GOAL, the Gun Owners Action League. 21 I think that's the -- the primary one in 22 Massachusetts. 23 Q. And what do you mean when you say 24 the primary one in Massachusetts? 25 A. It's the only one I've ever heard</p> <p>Page 17</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 of what was necessary to join? 3 A. Yes, sir. 4 Q. Okay. There were no training 5 requirements? 6 A. No, sir. 7 Q. How about previous to that, were 8 you a member of any other gun or rifle association? 9 A. No, sir. 10 Q. Sir, have you ever been arrested? 11 A. No, sir. 12 Q. Ever been convicted of a crime? 13 A. No, sir. 14 Q. Ever charged with a crime? 15 A. I had an instance in South 16 Carolina where I was given a fine. I don't know if 17 that counts. 18 Q. Okay. What -- what was the fine 19 for? 20 A. Possession of alcohol on a beach. 21 Q. Did anything ever come -- 22 anything ever come of that? Did you pay it? Did you 23 -- did you defend it? 24 A. I was told that -- that I would 25 receive something in the mail for like a summons</p> <p>Page 19</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 of. 3 Q. As -- as far as GOAL, Gun Owner's 4 membership within Massachusetts, is that what you 5 mean? 6 A. Yes, sir. 7 Q. Okay. And how long have you been 8 a member of that group? 9 A. Want to say around three years. 10 Q. And what -- what does your 11 membership entitle you to as part of that group, if 12 anything? 13 A. The only thing that I've utilized 14 from it that I'm -- and that I'm aware of is the 15 weekly newsletter that I get via email of any pending 16 cases or events, seminars, and stuff of that nature. 17 Q. Did -- did you have to do 18 anything in order to become a member of that group, 19 such as an application or payment or anything along 20 those lines? 21 A. Yes, sir. It was an -- an 22 application and a fee. I want -- I -- I do not 23 remember how much it was. I want to say a hundred 24 dollars or so. 25 Q. Was that -- was that the extent</p> <p>Page 18</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 element and I never got anything in the mail, so 3 nothing came up of it. 4 Q. Okay. And I'm sorry, did you say 5 that was in Virginia? 6 A. South Carolina. 7 Q. Oh, South Carolina. Okay. And 8 what -- why were you in South Carolina at that time? 9 A. One of my best friends was 10 getting married. 11 Q. And do you remember what year 12 that was? 13 A. It was 2014 or 2015. 14 Q. Okay. Have you ever had any 15 other contacts with law enforcement? 16 A. Just traffic violations. 17 Q. Any of those traffic violations 18 resulted in anything more than civil fines or -- or 19 something civil? 20 A. No, sir. 21 Q. Now, you maintain or you 22 currently have a license to carry firearms in 23 Massachusetts; is that correct? 24 A. Yes, sir. 25 Q. Okay. Your attorney produced</p> <p>Page 20</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 some documents along with some discovery requests in 3 this case, including some copies of your licenses. 4 I'm going to share those with you now and ask you 5 some questions about those. 6 A. Yes, sir. 7 Q. I'm going to pull them up -- I'm 8 going to pull them up on the screen. Just let me 9 know when you can see them. 10 A. I can see them. 11 Q. Okay. And I'll represent to you 12 there are three pages here. I'll scroll through them 13 slowly. They're Bates numbered Veotruba underscore 14 zero zero one through zero zero three. Do you 15 recognize these documents? 16 A. Yes, sir. 17 Q. Okay. And what do you recognize 18 them to be? 19 A. I have a -- my current L.T.C. on 20 there was the final image. 21 Q. Okay. 22 A. The one above that is a 23 screenshot from my cell phone documenting my attempts 24 to contact an authority figure in New York State in 25 regards to obtaining a New York State license to</p> <p style="text-align: right;">Page 21</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 A. No, sir. 3 Q. Okay. And following the 2013 4 license, it looks like you have one that was issued 5 in 2017 and one in 2023. What is the reason for the 6 issuance of the subsequent two licenses? 7 A. In Massachusetts, they are only 8 good for what the state says is five years. Said it 9 can shift depending on when your birthday and when 10 your application is and you have to redo the whole 11 process. 12 Q. Okay. Let's -- let's talk about 13 that process. So was the either 2012 or 2013 the 14 fir- -- the first time that you obtained a carry 15 license in Massachusetts? 16 A. Yes, sir. 17 Q. Okay. And how did -- what was 18 the application -- what were the application 19 requirements in obtaining that license? 20 A. You needed a classroom like a -- 21 an approved classroom session for the training in 22 which that's when I completed an eight hour in-person 23 with live fire training at -- at the Smith and Wesson 24 factory in Springfield, Massachusetts. I think it 25 was Springfield. They're no longer open, but after</p> <p style="text-align: right;">Page 23</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 carry. 3 Q. Okay. 4 A. And this was the license to carry 5 previous to my most current one. 6 MR. GALLAGHER: Okay. I would like to 7 mark this as Exhibit One. 8 THE REPORTER: Yes. 9 (Exhibit One was marked for 10 identification.) 11 MR. GALLAGHER: Thank you. 12 BY MS. GALAGHER: (Cont'g.) 13 Q. Now, Ms. Veotruba, I can show you 14 if necessary but I -- in some answers to 15 interrogatories that were provided to us, it -- it 16 also said that you had a 2013 Massachusetts license 17 at some point in time; is that correct? 18 A. Yes, sir. It was 2012 or 2013 19 depending on when you apply, kind of lands in that 20 five-year renewal on your birthday type. So I don't 21 remember the first year that it -- it became 22 accurate, but I did have a license prior to that one 23 that I no longer have a copy of. 24 Q. Okay. Did you have any license 25 in Massachusetts prior to the 2012 or 2013 license?</p> <p style="text-align: right;">Page 22</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 that you then take that certificate within one year 3 of completion of the course to your chief of police 4 in the town in which you reside at the time. In this 5 case it was Adams, Massachusetts. From there you 6 produce an application that you previously filled 7 out, but I sat down with the deputy in the station 8 and we walked through the full application as they 9 entered it into the computer. So it's essentially 10 done twice. They then fingerprint you and then they 11 mail those fingerprints off to the D.C.I.J.S., I 12 think is the acronym, in Boston. It's roughly a six- 13 week wait, give or take, in which then a license will 14 be then mailed back to the state police -- or sorry 15 to your local police in which you can then go pick it 16 up from them. 17 Q. Okay. Were you interviewed as 18 part of that process? 19 A. Yes, sir. 20 Q. Okay. And when did the interview 21 take place? 22 A. The -- it would've been roughly - 23 - in my case it was twelve weeks. It took processing 24 in Boston, so twelve weeks prior to the issuance of 25 my first license.</p> <p style="text-align: right;">Page 24</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 Q. And you had mentioned the D -- I 3 apologize if I screw this up. The D.C.I.J.S., was 4 that -- was that the investigating branch of that 5 application process? 6 A. I truly have no idea what that 7 department is or does. I just know that's where the 8 application goes to. 9 Q. Do you know if a background check 10 was completed as part of the application process? 11 A. I was told so, yes. 12 Q. Okay. Who told you? 13 A. The deputy that I interviewed 14 with. 15 Q. What part -- in what part of the 16 process were you interviewed? 17 A. So you can print out the 18 application online for -- for the L.T.C. That's just 19 something you can find off the state website or the 20 town website sometimes also has it. And then I went 21 through and I filled it out and made sure I had my 22 references and addresses and -- and all that pretty 23 standard stuff. You then just walk into the police 24 department and if they've got someone available, 25 they'll do it right there on the spot. Adams was a</p> <p>Page 25</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 through the whole process again for renewal. Is that 3 the case? 4 A. So for Adams, I did enter -- I 5 did sit directly with the deputy both times, 6 Pittsfield, however, much bigger and they did theirs 7 a little differently. I had to just drop off the 8 application with a money order paid to the state 9 police. And then they -- then they sent me mail when 10 they said I can come pick up my license. It was -- 11 there was almost no contact with law enforcement when 12 I renewed in Pittsfield. 13 Q. Did you have to take another 14 eight-hour training course when you renew? 15 A. No, sir. 16 Q. Are you -- do you have any 17 understanding or familiarity with the application 18 requirements in New York State to obtain a carry 19 permit? 20 A. Only a few snippets from the news 21 that I have heard recently. 22 Q. Okay. Do you know -- I'm sorry, 23 go ahead. 24 A. That -- that was -- sorry. It 25 was very vague. It -- it, you know, I heard that</p> <p>Page 27</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 small town and I -- I sort of remember doing it 3 basically right on the spot. I did not have to set 4 up an appointment. 5 Q. Was there an application -- oh. 6 A. So the --. 7 Q. Go ahead. 8 A. I apologize for talking over. I 9 say, so that is when I think they just brought me 10 into the back and I sat with the deputy and it was a 11 formal conversation. 12 Q. Was there a fee associated with 13 the application? 14 A. Yes, sir. 15 Q. And do -- do you recall what the 16 fee was? 17 A. There were roughly two fees. So 18 there was a -- the first fee I had to pay for the 19 course, which was, I believe, a hundred dollars. And 20 then I have to pay another hundred dollars to the 21 state police every time you want to renew -- apply 22 for your first one or renew your application or 23 L.T.C. 24 Q. Regard -- regarding the renewals, 25 I believe you said previously that you had to go</p> <p>Page 26</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 there was a training requirement similar to 3 Massachusetts. 4 Q. Do you know any other differences 5 between the Massachusetts process and your process? 6 A. I do not. 7 Q. Okay. What was the reason for 8 obtaining the Massachusetts carry license? 9 A. So for self-defense, first and 10 foremost, in Massachusetts, they -- you actually are 11 required to have a license to carry even to own a 12 firearm in your home. 13 Q. Does Massachusetts require them 14 for all types of firearms within the home or just 15 certain firearms within the home? 16 A. All firearms. 17 Q. So even long guns, you would -- 18 they require a permit? 19 A. Yeah. Yes, sir. 20 Q. I'm going to direct you back to 21 what's been marked as Exhibit One, the first page. 22 Are you able to see that? 23 A. Yes, sir. 24 Q. Okay. Up -- up near the top 25 right underneath Commonwealth of Massachusetts, what</p> <p>Page 28</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 does Class A large capacity signify on the license? 3 A. This I believe has been recently 4 re-categorized, but Class A large capacity accounts 5 for any gun, I believe, that is capable of accepting 6 a detachable magazine of over ten rounds. I believe 7 that's the definition. 8 Q. Do you know if Massachusetts 9 issues licenses that are either less than or greater 10 than a Class A large capacity? 11 A. Yes, sir. There used to be class 12 A, B, C, and D, where B did not account for the large 13 capacity element, you know, then Class C and D, I 14 believe, were in regards to any pistol and maybe 15 pepper spray. I honestly don't remember the 16 different divisions. 17 Q. But so it sounds like Class A 18 large capacity is the -- the largest and -- 19 A. The most unrestricted, yes, sir. 20 Q. Thank you. Thank you for the 21 help with that. And does that category include all 22 the subcategories of B, C, and D that you just 23 referenced? 24 A. Yes, sir. 25 Q. And again, just for the record,</p> <p>Page 29</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 interrogatories that were produced, and again, I can 3 show them to you if -- if you need to see them, but 4 the -- the 2012 or 2013 license that you had had a 5 restriction for sporting purposes only. Is that 6 correct? 7 A. Yes, sir. 8 Q. Okay. And what does that mean? 9 A. So sporting entailed gun ranges, 10 competitions, as well as hunting. 11 Q. And why was it changed between 12 that license and the one issued in 2017? 13 A. So the Town of Adams had an 14 unofficial standing policy that the first license to 15 carry issued to any resident of the town would be 16 given a restriction of sporting or hunting or what 17 are the other subcategories. And upon completion of 18 that term, of that five years or so for your license, 19 if there were no issues that you had with law 20 enforcement, they would then renew your license for 21 all lawful purpose. 22 Q. And did the sporting purposes 23 only restriction allow you to have guns in your home 24 for self-defense? 25 A. Yes, sir.</p> <p>Page 31</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 we're looking at the 2017 issuance license that 3 expired in 2023. 4 A. Yes, sir. 5 Q. So when -- so in order to obtain 6 the Class A large capacity, was that something that 7 you had to specifically select on the -- on the 8 application? 9 A. I believe so. 10 Q. It's okay if you don't remember. 11 Do you not remember? 12 A. I don't remember. No, sir. 13 Q. Going down about halfway down, do 14 you see where it says restrictions all lawful 15 purpose? 16 A. Yes, sir. 17 Q. Okay. What do you understand 18 that to mean? 19 A. Yes, sir. So Massachusetts has 20 several categories basically at the discretion of the 21 chief of police. They can restrict your license to 22 carry and all-off full purpose means there are no 23 restrictions outside of what is just outlined in the 24 Mass General Law. 25 Q. And referring back to the</p> <p>Page 30</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 Q. And just one more question on 3 this license. Is it correct to assume that the 4 handwritten address on the bottom is just an update 5 to the license because you moved? 6 A. Yes, sir. 7 Q. Now, directing your attention to 8 the third page of Exhibit One, can you see your 9 current license issued in 2023 that expires in 2029? 10 A. Yes, sir. 11 Q. Okay. Do you see where it says 12 restrictions, none? 13 A. Yes, sir. 14 Q. Why did it -- if you know, why 15 did it change from all legal or all lawful purposes 16 to no restrictions or none? 17 A. I do not know. 18 Q. Okay. So you didn't achieve a 19 double O status or something like that in different 20 part of your life, such that -- 21 A. No, sir. 22 Q. -- there are no restrictions on 23 you? 24 A. No, sir. 25 Q. Okay.</p> <p>Page 32</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 A. No, sir. 3 Q. Do you hold any pistol licenses 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 Massachusetts and been denied? 11 A. No, sir. 12 Q. Has your Massachusetts license 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 18 of your licenses ever been affected by something you 19 did or did not do? 20 A. No, sir. 21 Q. I'm going to take this down for 22 the time being. 23 Sir, I just want to ask you some 24 questions specifically about this lawsuit. Why -- 25 why are you suing New York State?</p> <p>Page 33</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 Did your job ever take you to New York State? 3 A. Somewhat not -- not specifically, 4 except where I frequently recruit -- well, 5 frequently. Our company frequently recruits at 6 R.P.I. in Troy. I have only recruited at R.P.I. once 7 though personally. And then if I have to fly for 8 business travel, I usually fly out of Albany 9 International Airport. 10 Q. But other -- other than those 11 reasons your work wouldn't take you to New York 12 State? 13 A. No, sir. 14 Q. And besides your friends and 15 hiking or traveling to the Stewards and your limited 16 visits to New York with work, do you have any other 17 connections with New York that would bring you into 18 New York State? 19 A. No, sir. 20 Q. Have you ever worked in New York 21 State for a company in New York State? 22 A. No, sir. 23 Q. Ever lived in New York? I'm 24 sorry if I already asked you that, but have you ever 25 lived in New York?</p> <p>Page 35</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 A. I wanted to apply for a New York 3 State license, and I was told that I did not have the 4 right to apply. 5 Q. Who told you that? 6 A. Sheriff Bourgault. 7 Q. Why do you want a New York 8 license? 9 A. I live extremely close to New 10 York and I frequent New York for a multitude of 11 reasons. 12 Q. Why do you visit New York? 13 A. I -- firstly, I spend a lot of 14 time hike -- both hiking and hunting, and the state 15 forest behind my house is contiguous into the state 16 of New York without crossing through any other sort 17 of barriers. So having that sort of coverage would 18 be beneficial. I frequent -- there's a Steward's Gas 19 Station in New Lebanon that sells fuel that does not 20 contain any ethanol, which I like to store up for my 21 multitude of farm implements. I have -- some of my 22 best friends live between Troy and Columbia County so 23 frequently just visiting their homes and -- and their 24 lake houses. So those are the -- the big reasons. 25 Q. Did you ever work in New York?</p> <p>Page 34</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 A. No, sir. 3 Q. What is your understanding of New 4 York State law regarding who can apply for a firearms 5 license in New York? 6 A. So what I had originally learned, 7 you know, it was kind of through word of mouth with 8 people, you know, uh who do live there. They said if 9 you own land or worked there. And then that was 10 confirmed when I called the -- Sheriff Bourgault. 11 Q. Why did you call Sheriff 12 Bourgault? 13 A. So he is the sheriff of 14 Rensselaer County, I believe. I -- I tend to get 15 Columbia and Rensselaer a little swapped. I'm in 16 them both frequently. Those are the -- the two towns 17 that border the entire western border of 18 Massachusetts, and those are the two towns that I am 19 most frequently in and most -- most familiar with. 20 Q. Do you recall when you called the 21 Rensselaer County Sheriff's Office and spoke with 22 Sheriff Bourgault? 23 A. It would've been around the time 24 that -- with the timestamps on that screenshot as 25 part of Exhibit A.</p> <p>Page 36</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 Q. So late 2023? Would that be 3 fair? 4 A. Yes, sir. 5 Q. What was -- what was said on your 6 call with Sheriff Bourgault? 7 A. I asked what is the application 8 process for an out-of-state resident who, you know, 9 happens to live in Pittsfield. And he was very 10 deeply apologetic, very nice, and he said, no, 11 unfortunately, you -- it requires that you -- that 12 you are a resident or -- or work here. And that was 13 it. And then, you know, he apologized. He -- I 14 think he -- if I could quote him, he said I know you 15 live so close; you can probably taste it. And then I 16 said, you know, thank you. And -- and I hung up. 17 Q. Can you recall anything else that 18 was said by either you or him on that call? 19 A. That was it. 20 Q. Okay. Approximately how long did 21 that call last, if you remember? 22 A. Thirty seconds, maybe. 23 Q. Did you call any other county 24 sheriff's offices to inquire about obtaining a 25 license in New York?</p> <p>Page 37 800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 A. I don't remember. 3 Q. And it looks like you attempted 4 to call the New York State Police three times; is 5 that fair? 6 A. Yes, sir. 7 Q. Okay. And why did you not try 8 after three attempts any further? 9 A. At -- at that point, it just -- 10 the phone tree didn't seem responsive. It frequently 11 -- if I remember right, it would just drop you. I 12 think it put me on hold and then it just cut me off. 13 Q. Besides the Rensselaer County 14 Sheriff's Office and the New York State Police, did 15 you attempt to call anyone else or any other entity 16 in New York to inquire about the permitting 17 requirements? 18 A. No, sir. 19 Q. How did you come to be involved 20 in this lawsuit? 21 A. I was watching a video from a 22 YouTube channel called Guns and Gadgets. I like that 23 channel. And it was brought up in the video that 24 they would like to talk to anyone who was looking for 25 a New York carry license who lived in the state of</p> <p>Page 39 800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 A. No, sir. 3 Q. Okay. Why not? 4 A. He made it clear that that was a 5 state law. 6 Q. What did he say, if you recall, 7 regarding that specifically? 8 A. He said New York does not allow 9 that. Not that it -- not that just Rensselaer, it 10 was not a town specific thing, it was a state thing. 11 Q. Did somebody tell you to call 12 Rensselaer County or did you do that on your own 13 volition? 14 A. I called on my own volition. 15 Q. And we talked earlier when we 16 looked at Exhibit One, one of the pages there showed 17 a call log from your cell phone of -- of when you 18 attempted to call the New York State Police. Is that 19 correct? 20 A. Yes, sir. 21 Q. Okay. Did you ever get through 22 to anyone at the New York State Police? 23 A. No, sir. 24 Q. Okay. Did you leave a -- did you 25 -- did you have an opportunity to leave a message?</p> <p>Page 38 800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 Massachusetts. 3 Q. Did somebody send you that video 4 or did you find it on your own? 5 A. I found that on my own. 6 Q. And -- and so who did -- so 7 having watched that video, who did you contact? 8 A. Who I assume is the host of said 9 podcast, if you would call it, Jared. It was 10 jared@gunsandgadgets.com or something like that. 11 Q. Was it -- did -- did you send him 12 an email? 13 A. Yes, I shot him an email with my 14 information. 15 Q. Okay. And did you receive 16 something back from him? 17 A. Clarifying, because I -- I didn't 18 answer his email accurately the first time. I think 19 I forgot to put my address or something of that 20 nature, but so he had responded with clarification of 21 my information, I responded with said clarification, 22 and that was it. 23 Q. And was -- did -- did he provide 24 you with any other information or seek any other 25 information from you when he responded to your</p> <p>Page 40 800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 initial email? 3 A. No, sir. 4 Q. And then what happened after your 5 exchange with that individual? 6 A. I want to say a couple of days, a 7 week or so later Mr. Stamboulieh reached out to me. 8 Q. Sir, do you know how this lawsuit 9 is being funded? 10 A. I do not. 11 Q. Okay. Are you paying your 12 attorney for this lawsuit? 13 A. No, sir. 14 Q. Okay. Do you know if it's -- if 15 the lawsuit was brought by the Gun Owners of America? 16 A. I do not know. 17 Q. Okay. Do you have any 18 association with the Gun Owners of America? 19 A. No, sir. 20 Q. Have they ever contacted you or 21 have you ever contacted them? 22 A. No, sir. 23 Q. Okay. Next, I'd like to ask you, 24 I'm just going to ask you a series of questions that 25 -- that I need to ask that are associated with New</p> <p>Page 41</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 Q. Okay. Are you a fugitive from 3 justice? 4 A. No, sir. 5 Q. Do you use any illegal drugs? 6 A. No, sir. 7 Q. Do you use pot? 8 A. No, sir. 9 Q. Have you ever suffered any mental 10 illness? 11 A. No, sir. 12 Q. Have you ever been committed or 13 spent time in a mental health institution? 14 A. No, sir. 15 Q. Have you ever had any 16 professional license revoked? 17 A. No, sir. 18 Q. Have you ever had a driver's 19 license revoked? 20 A. No, sir. 21 Q. Have you ever had a guardian 22 appointed to manage your affairs? 23 A. No, sir. 24 Q. Never been convicted of an 25 assault, correct?</p> <p>Page 43</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 York licensing requirement. Please don't take any of 3 these personal. We'll -- we can probably get through 4 them pretty quickly, but I'm just going to run down 5 the list. Are you a United States citizen? 6 A. Yes, sir. 7 Q. Okay. Have you ever been 8 convicted anywhere of a felony or serious offense? 9 A. No, sir. 10 Q. And that -- ever been convicted 11 of anything including a misdemeanor or a violation? 12 A. No, sir. 13 Q. Have you ever had a warrant out 14 for your arrest? 15 A. No, sir. 16 Q. Ever been investigated by law 17 enforcement outside of your applying for a 18 Massachusetts pistol permit? 19 A. I don't know if my security 20 clearance for work requires law enforcement 21 investigation, but I would've been investigated via 22 that. 23 Q. Okay. Other than that, would -- 24 are you aware of any other investigations? 25 A. No, sir.</p> <p>Page 42</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 A. No, sir. 3 Q. Okay. Convicted of D.U.I? 4 A. No, sir. 5 Q. Okay. Would you be able and 6 willing to submit the information required in the New 7 York State Firearms permitting application, such as 8 the name of your spouse and any other adults residing 9 in your home? 10 A. Yes, sir. 11 Q. Okay. Are you married? 12 A. Yes, sir. 13 Q. Okay. Would -- would you able -- 14 would you be able to provide four character 15 references? 16 A. In general? 17 Q. For purposes -- if you were to 18 apply for a pistol permit in New York State, would 19 you be able to supply four references? Character 20 references. 21 A. Do they require New York State 22 residency? 23 Q. Let's take that. If they were to 24 require individuals within New York State, would you 25 be able to provide them?</p> <p>Page 44</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 A. If I could like, choose a person, 3 and said, person spouse. And that's not like a 4 double dipping situation where like a husband and a 5 wife, yes, sir. 6 Q. Okay. And how about would you be 7 able to come up with four character references if 8 they did not have to be New York State residents? 9 A. Yes, sir. 10 Q. Okay. Is there any reason to 11 think that you would use a weapon in any way that 12 would endanger yourself or others? 13 A. No, sir. 14 Q. Okay. Have you ever been present 15 for an incident where someone was shot or injured 16 with a weapon? 17 A. No, sir. 18 Q. Thank you. This next question is 19 just for posterity's sake. You are not a retired 20 member of the New York State Police, correct? 21 A. No, sir. 22 Q. Are you actively trying to obtain 23 a license in any other state besides New York? 24 A. No, sir. 25 Q. And I know based on our prior</p> <p style="text-align: right;">Page 45</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 Q. As you sit here today, do you 3 know whether or not any of the other counties in New 4 York State other than Rensselaer accept applications 5 from non-residents, non-New York residents? 6 A. Could you repeat the question? 7 Q. Sure. Do you -- do you know 8 whether or not any other counties in New York State 9 other than Rensselaer accept permit applications from 10 non-residents? 11 A. I do not know for certain, no. 12 Q. Have you ever been told that the 13 other sixty-one or that the other approximate sixty- 14 one counties besides Rensselaer, would not accept an 15 application from a non-resident? 16 A. It was implied by Mr. Bourgault's 17 statement that it was a New York State policy. 18 Q. If New York City was accepting 19 licenses from non-residents, would you consider 20 applying there? 21 A. Probably not. No. 22 Q. Okay. Why not? 23 A. I've -- I've never been to New 24 York City. I don't particularly care to go there. 25 Q. If New York City issued permits</p> <p style="text-align: right;">Page 47</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 conversation that you were informed by Sheriff 3 Bourgault that you could not apply in New York, but 4 specifically have you ever physically gone somewhere 5 and attempted to submit paperwork to apply? 6 A. No, sir. 7 Q. Okay. Have you ever mailed a New 8 York permit application and information anywhere in a 9 -- in an attempt to apply for a permit? 10 A. No, sir. 11 Q. Have you considered applying for 12 a New York City pistol carry license? 13 A. No, sir. 14 Q. Okay. Do you have any 15 understanding as to whether New York City accepts 16 applications from non-residents who do not work in 17 New York or otherwise have a -- have a business in 18 New York? 19 A. I recently read in the news that 20 Mayor Adams was working that or adjusting it, but I 21 had not looked any further beyond the news article. 22 Q. And -- and is it fair to say you 23 haven't given any consideration to filing in New York 24 City? 25 A. Correct.</p> <p style="text-align: right;">Page 46</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 that were for non-residents that applied to New York 3 City as well as the rest of the state, would that 4 change your -- your position on whether you'd apply? 5 A. I'd have to look at the other -- 6 other factors of -- of cost and drive and -- and 7 application process. I -- I can't say for certain, 8 but I -- I -- I'm not sure. 9 Q. Because it's fair to say that 10 what you're ultimately seeking in this lawsuit is the 11 ability to apply for a -- for a carry license in New 12 York State, correct? 13 A. Yes, sir. 14 Q. Is there anything else that 15 you're specifically looking to achieve in this 16 lawsuit? 17 A. No, sir. 18 Q. Okay. If I were to reference 19 license reciprocity, would you have an understanding 20 as to what I mean? 21 A. I understand reciprocity as you 22 honor another state's license. 23 Q. Okay. Are you -- are you looking 24 to have your Massachusetts license honored in New 25 York State?</p> <p style="text-align: right;">Page 48</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 A. I -- I -- that would make my life 3 the easiest. But I understand that, you know, states 4 have the right to establish their own licensing 5 schemes. 6 Q. So if you were able to apply for 7 a license in New York, that would be sufficient for 8 what you attempt to achieve in this lawsuit. Is that 9 fair to say? 10 A. Yes, sir. 11 Q. Sir, do you know any of the other 12 plaintiffs in this lawsuit personally? 13 A. No, sir. 14 Q. Have you ever spoken with them? 15 A. No, sir. 16 MR. GALLAGHER: Can I -- can we just 17 take five -- five minutes? I think -- I'm hoping I'm 18 just about done. That -- that went rather quickly, 19 but if we could just take a quick five-minute break 20 and come back and I'll wrap things up. 21 MS. STAMBOULICH: Okay. 22 MR. GALLAGHER: Thank you. 23 (Recess taken at 1:49 p.m.) 24 (Resumed at 1:51 a.m.) 25 THE REPORTER: We're on the record.</p> <p style="text-align: right;">Page 49</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 because if it was you, it looks like you're doing 3 well and it wasn't an issue and --. 4 A. Yeah, no, I'm -- I'm okay. Thank 5 you. 6 Q. Okay. The individual needed like 7 seven rabies shots or something like that, so. 8 MR. GALLAGHER: Okay. I don't have 9 any further questions. Thank you for your time 10 today. Ms. Fitzsimmons may have some questions for 11 you, but otherwise we appreciate you being here and 12 taking the time in speaking with us today. 13 THE WITNESS: Yes, sir. Thank you. 14 MS. FITZSIMMONS: I do not have any 15 questions for you today. Thank you for 16 participating, 17 MS. STAMBOULICH: And I don't have any 18 questions either. But Mr. Veotruba, you have an 19 opportunity, you have a right to read and sign the 20 deposition and make sure that the court reporter 21 transcribed your answers accurately. It's totally up 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 25 to invoke that right to do so. Would you like to</p> <p style="text-align: right;">Page 51</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 MR. GALLAGHER: Just a few more 3 questions, Ms. Veotruba. 4 BY MR. GALLAGHER: (Cont'g.) 5 Q. Would it surprise you to know 6 that New York allows for licenses to be issued to a 7 non-citizen or to a person not a citizen of and 8 usually a resident of New York State? 9 A. Yes, I would find that 10 surprising. 11 Q. All right. Does that describe 12 you? 13 A. As a non-resident, I don't want 14 to say non-citizen. 15 Q. Okay. Okay. As a non-resident 16 just, just one last question and I have to admit, I 17 did a Google search of you in preparation for this. 18 Were you -- were you attacked by a Bobcat in 2014? 19 A. No. That was a -- that's a funny 20 story though. There is even another Michael Veotruba 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 --</p> <p style="text-align: right;">Page 50</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 read and sign? 3 THE WITNESS: I don't think so. No. 4 I -- I'd be willing to waive that right. 5 MS. STAMBOULICH: Perfect. 6 MR. GALLAGHER: Okay. Thank you so 7 much, Mr. Veotruba. We appreciate it. Have a good 8 rest of your day and -- and have a nice weekend. 9 THE WITNESS: Same to you. 10 (The deposition concluded at 1:53 11 p.m.) 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 52</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 STATE OF) COUNTY OF)</p> <p>3</p> <p>4 I, MICHAEL VEOTRUBA, have read the foregoing record of my testimony taken at the time and place noted in the heading hereof and do hereby acknowledge: 5 (Please check one) 6 () That it is a true and correct transcript of same. 7 () With the exceptions noted in the attached errata sheet, it is a true and correct transcript of same.</p> <p>8</p> <p>9 X _____</p> <p>10 MICHAEL VEOTRUBA</p> <p>11 Sworn to before me this 12 _____ day of _____, 2024. 13 X _____ NOTARY PUBLIC My Commission Expires: 14 _____ 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 53</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 ASSOCIATED REPORTERS INTERNATIONAL, INC. (800) 523-7887</p> <p>3</p> <p>4 Date: Case Name: Higbie v James, et al Index Number: 24-CV-0174 MAD/TWD 5 Deponent: Michael Veotruba Deposition Date: 10-18-24 6 Examining Attorney: Matthew Gallagher, A.A.G. 7 Dear Mr. Veotruba: 8</p> <p>9 Please read and make any changes and/or corrections in your testimony and sign the transcript in the presence of a notary public. Please do so within thirty (30) days. 10 If you fail to sign the transcript within thirty (30) days, it will be delivered to the appropriate parties 11 without signature. Return the transcript with corrections, if any, to: 12</p> <p>13 OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL BY: MATTHEW GALLAGHER, A.A.G. The Capitol 14 Albany, New York 12224 15</p> <p>16 CORRECTIONS: _____ Word or phrase: _____ Corrected to: _____ 17</p> <p>18 _____ Word or phrase: _____ Corrected to: _____ 19</p> <p>20 _____ Word or phrase: _____ Corrected to: _____ 21</p> <p>22 _____ Word or phrase: _____ Corrected to: _____ 23</p> <p>24 _____ Word or phrase: _____ Corrected to: _____ 25</p> <p>_____ Date Signed _____ MICHAEL VEOTRUBA</p> <p style="text-align: right;">Page 55</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Higbie v James, et al – 10-18-24 – Michael Veotruba 2 I, ANNETTE LAINSON, do hereby certify that the 3 foregoing testimony of MICHAEL VEOTRUBA was taken by me, 4 in the cause, at the time and place, and in the presence 5 of counsel, as stated in the caption hereto, at Page 1 6 hereof; that before giving testimony said witness was duly 7 sworn to testify the truth, the whole truth and nothing 8 but the truth; that the foregoing typewritten 9 transcription, consisting of pages number 1 to 52, 10 inclusive, is a true record prepared by me and completed 11 by Associated Reporters Int'l., Inc. from materials 12 provided by me. 13</p> <p>14 ANNETTE LAINSON, Reporter 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 54</p> <p>800-523-7887 ARII@courtsteno.com</p>	

A		
A.A.G 2:10,11 55:6,13 a.m 49:24 ability 12:8 48:11 able 13:21 28:22 44:5,13,14 44:19,25 45:7 49:6 accept 47:4,9,14 accepting 29:5 47:18 accepts 46:15 account 29:12 accounts 29:4 accurate 8:17 22:22 accurately 40:18 51:21 achieve 32:18 48:15 49:8 acknowledge 53:4 acronym 24:12 action 5:14 7:3 11:17 17:20 active 17:20 actively 45:22 Adams 24:5 25:25 27:4 31:13 46:20 addition 5:10 6:23 additional 9:2 address 32:4 40:19 addresses 25:22 adjusting 46:20 administering 7:13 8:25 admit 50:16 adults 44:8 affairs 43:22 affiliations 17:17 affirm 10:22 afternoon 11:13 agreed 5:3,15,25 6:6,11,16 7:4 8:5 ahead 26:7 27:23 Airport 35:9 al 1:1 2:1 3:1 4:1 5:1 6:1 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1	49:1 50:1 51:1 52:1 53:1 54:1 55:1,4 Albany 2:13 35:8 55:14 alcohol 19:20 all-off 30:22 allow 12:24 31:23 38:8 allows 50:6 America 41:15,18 and/or 55:8 Annette 1:24 54:2,14 anniversary 17:14 answer 11:19 12:6,6,8,12,25 13:17,22 40:18 answered 12:14 answering 13:2 answers 22:14 51:21 apologetic 37:10 apologize 25:3 26:8 apologized 37:13 apparently 50:21 appearance 10:6 APPEARANCES 2:2 application 18:19,22 23:10 23:18,18 24:6,8 25:5,8,10 25:18 26:5,13,22 27:8,17 30:8 37:7 44:7 46:8 47:15 48:7 applications 46:16 47:4,9 applied 33:6,9 48:2 apply 22:19 26:21 34:2,4 36:4 44:18 46:3,5,9 48:4,11 49:6 applying 42:17 46:11 47:20 appointed 43:22 appointment 26:4 appreciate 51:11 52:7 appropriate 8:19,23 55:10 approved 23:21 approximate 47:13 Approximately 37:20 ARII 7:13 arrest 42:14 arrested 19:10 article 46:21 50:23 asked 35:24 37:7 assault 43:25 associated 7:12 26:12 41:25	54:11 55:2 association 19:8 41:18 associations 17:18 assume 32:3 40:8 attached 53:6 attacked 50:18 attempt 39:15 46:9 49:8 attempted 38:18 39:3 46:5 attempts 21:23 39:8 attention 32:7 attorney 2:9 7:24 10:9,12,18 11:14,15 14:11,16,20 20:25 41:12 55:6,12 attorneys 10:6 August 16:5 authority 21:24 available 25:24 aware 18:14 42:24
		B
		B 4:2 29:12,12,22 back 24:14 26:10 28:20 30:25 40:16 49:20 background 25:9 bar 5:12 7:2 barriers 34:17 based 45:25 basically 26:3 30:20 Bates 21:13 beach 19:20 bear 8:6 begun 5:20 behalf 10:9,13,16,18 believe 17:19 26:19,25 29:3 29:5,6,14 30:9 36:14 beneficial 34:18 best 12:8 20:9 34:22 beyond 46:21 big 34:24 51:23 bigger 27:6 birth 15:2 birthday 22:20 23:9 Bobcat 50:18 border 36:17,17 borne 9:5 Boston 24:12,24 bottom 32:4

Bourgault 1:11 34:6 36:10 36:12,22 37:6 46:3 Bourgault's 47:16 branch 25:4 break 13:12,15,18 49:19 bring 35:17 brought 26:9 39:23 41:15 business 35:8 46:17	charged 19:14 charges 9:4 check 25:9 53:5 chief 24:3 30:21 choose 45:2 circumstances 8:23 citizen 42:5 50:7 City 46:12,15,24 47:18,24,25 48:3 civil 5:6,23 6:4,18 8:9 20:18 20:19 clarification 40:20,21 Clarifying 40:17 class 17:6 29:2,4,10,11,13,17 30:6 classroom 23:20,21 clean 12:19 clear 38:4 clearance 42:20 close 34:9 37:15 Columbia 1:14 2:15 10:18 17:6 34:22 36:15 come 19:21,22 27:10 39:19 45:7 49:20 commenced 10:2 Commission 53:13 committed 43:12 Commonwealth 28:25 company 35:5,21 competitions 31:10 complaints 14:6 completed 15:23 23:22 25:10 54:10 completely 12:25 completion 24:3 31:17 computer 24:9 concentration 16:7 concluded 52:10 conduct 6:20 8:6,11 conducted 7:7 9:6 conducting 9:3 conference 7:7 8:7 confirmed 36:10 confirming 7:16 congrats 17:15 connections 35:17 consent 7:19	consider 47:19 consideration 46:23 considered 7:20 46:11 consisting 54:9 Cont'g 22:12 50:4 contact 21:24 27:11 40:7 contacted 41:20,21 contacts 20:15 contain 34:20 contiguous 34:15 continuously 15:13 control 7:12 controlled 5:24 conversation 12:22 26:11 46:2 conversation's 12:22 convicted 19:12 42:8,10 43:24 44:3 copies 21:3 copy 6:13 7:25 8:8 22:23 correct 11:21 20:23 22:17 31:6 32:3 38:19 43:25 45:20 46:25 48:12 53:5,7 Corrected 55:16,18,19,20,21 55:22,23 corrections 55:8,11,15 cost 48:6 costs 8:6 9:2 counsel 5:4,16,21 6:2,7,12,14 6:17 7:5,8,10 8:3 54:5 counties 47:3,8,14 counts 19:17 county 1:12 2:15 10:18 34:22 36:14,21 37:23 38:12 39:13 53:2 couple 41:6 course 24:3 26:19 27:14 court 1:2 7:7,16 12:17 13:8 51:20 courtesy 13:2 coverage 34:17 CPLR 7:6 8:8,11 create 12:19 crime 19:12,14 crossing 34:16 current 4:6 21:19 22:5 32:9 currently 15:4 16:17 20:22
C		
C 3:2 29:12,13,22 California 15:15,17 call 36:11 37:6,18,21,23 38:11,17,18 39:4,15 40:9 called 36:10,20 38:14 39:22 Canton 2:7 capable 29:5 capacity 1:9,11,14 29:2,4,10 29:13,18 30:6 Capitol 2:12 55:13 caption 54:5 care 47:24 CARL 1:4 Carolina 19:16 20:6,7,8 carry 4:6,7 20:22 22:2,4 23:14 27:18 28:8,11 30:22 31:15 33:4 39:25 46:12 48:11 Cascade 15:5 case 11:20 14:19,23 21:3 24:5,23 27:3 55:4 cases 18:16 categories 30:20 category 29:21 cause 54:4 cell 21:23 38:17 cellphone 4:6 certain 28:15 47:11 48:7 certificate 24:2 certification 6:8 certify 54:2 change 32:15 48:4 changed 31:11 changes 55:8 channel 39:22,23 character 44:14,19 45:7 charge 6:15		

cut 39:12	discussed 14:19,23	ESQ 2:5,16
<hr/>	DISTRICT 1:2,3	essentially 24:9
D	divisions 29:16	establish 49:4
d 3:2,2 4:2 8:11,13 25:2	documenting 21:23	et 1:1 2:1 3:1 4:1 5:1 6:1 7:1
29:12,13,22	documents 14:4,7 21:2,15	8:1 9:1 10:1 11:1 12:1 13:1
D.C.I.J.S 24:11 25:3	doing 26:2 51:2	14:1 15:1 16:1 17:1 18:1
D.U.I 44:3	dollars 18:24 26:19,20	19:1 20:1 21:1 22:1 23:1
date 1:19 15:2 55:3,5,24	Donald 1:13 2:14 10:19	24:1 25:1 26:1 27:1 28:1
day 52:8 53:11	double 32:19 45:4	29:1 30:1 31:1 32:1 33:1
days 41:6 55:9,10	Dreadnought 17:6	34:1 35:1 36:1 37:1 38:1
deal 51:23	drive 48:6	39:1 40:1 41:1 42:1 43:1
Dear 55:7	driver's 43:18	44:1 45:1 46:1 47:1 48:1
deemed 5:22	drop 27:7 39:11	49:1 50:1 51:1 52:1 53:1
deeply 37:10	drugs 43:5	54:1 55:1,4
defend 19:23	duly 54:6	ethanol 34:20
Defendant 10:18	Dynamics 16:20 17:12	events 18:16
Defendants 1:16	<hr/>	everyday 12:21
definition 29:7	E	exactly 50:23
degree 15:24 16:2	E 3:2,2,2 4:2,2	examination 3:4 5:9,12,17
delivered 55:10	e-mailed 8:2	5:19,21 6:3,9,13,23,25 8:11
denied 33:10	earlier 38:15	11:11
department 17:2 25:7,24	easiest 49:3	examined 5:18
depending 22:19 23:9	Economics 16:16	Examining 55:6
Deponent 55:5	education 15:23	Excellent 13:12
deposed 8:9 11:23	efficiently 12:4	exceptions 53:6
deposition 1:18 7:6,15 8:7,14	eight 23:22	exchange 41:5
8:18,20,21 9:2,3,6 10:2	eight-hour 27:14	exercise 51:22
11:20 12:21 13:25 14:17	either 23:13 29:9 37:18	exhibit 7:24,25 8:4 22:7,9
51:20,24 52:10 55:5	51:18	28:21 32:8 36:25 38:16
Depositions 6:20	electronic 8:15 9:4	exhibits 7:23 8:20
deputy 24:7 25:13 26:10	electronically 8:16	expect 13:14
27:5	element 20:2 29:13	experience 17:9
describe 50:11	email 18:15 40:12,13,18 41:2	expired 30:3
Described 4:4	employed 16:17,19	expires 32:9 53:13
design 17:5	endanger 45:12	explain 17:3
designate 8:16	enforcement 20:15 27:11	express 7:19
detachable 29:6	31:20 42:17,20	extent 18:25
differences 28:4	engineering 16:25	extremely 34:9
different 12:11 29:16 32:19	engineers 17:2	<hr/>
differently 27:7	ensure 8:17	F
difficult 12:20	entailed 31:9	F 3:2
dipping 45:4	enter 27:4	factors 48:6
direct 3:4 11:11 28:20	entered 24:9	factory 23:24
directing 32:7	entire 36:17	fail 55:10
directly 27:5	entitle 18:11	failure 5:10,20 6:24
discovery 21:2	entity 39:15	fair 37:3 39:5 46:22 48:9
discretion 30:20	errata 53:7	49:9

familiar 36:19 familiarity 27:17 far 18:3 farm 34:21 fee 18:22 26:12,16,18 fees 26:17 felony 42:8 figure 21:24 filing 6:8 46:23 filled 24:6 25:21 final 21:20 find 25:19 40:4 50:9 fine 19:16,18 finer 20:18 fingerprint 24:10 fingerprints 24:11 finish 12:24 fire 23:14 fire 23:23 firearm 28:12 firearms 20:22 28:14,15,16 36:4 44:7 first 22:21 23:14 24:25 26:18 26:22 28:9,21 31:14 40:18 firstly 34:13 Fitzsimmons 2:16 10:17,17 51:10,14 five 23:8 31:18 49:17,17 five-minute 49:19 five-year 22:20 fly 35:7,8 following 23:3 foregoing 53:3 54:3,8 foremost 28:10 forest 34:15 forgot 40:19 form 5:8 6:21 formal 15:23 26:11 found 40:5 four 15:8 44:14,19 45:7 frequent 34:10,18 frequently 34:23 35:4,5,5 36:16,19 39:10 friends 20:9 34:22 35:14 fuel 34:19 fugitive 43:2 full 11:5 24:8 30:22	funded 41:9 funny 50:19 furnished 6:14 further 5:15,25 6:6,11,16 7:23 39:8 46:21 51:9 <hr/> G <hr/> G 1:8 2:8 3:2 11:17 Gadgets 39:22 GALAGHER 22:12 Gallagher 2:10 3:4 10:8,8 11:10,12,14 22:6,11 49:16 49:22 50:2,4 51:8 52:6 55:6 55:13 Gas 34:18 general 2:9 10:9,12 11:15 12:3 16:20 17:12 30:24 44:16 55:12 generated 8:18 getting 20:10 give 10:23 12:7,25 13:2,9,15 24:13 given 19:16 31:16 46:23 giving 54:6 go 13:14 16:9 24:15 26:7,25 27:23 47:24 GOAL 17:20 18:3 goes 25:8 going 10:23 12:2,6,12,23 21:4,7,8 28:20 30:13 33:21 41:24 42:4 good 11:13 23:8 50:24 52:7 Google 50:17 graduate 16:12 greater 29:9 group 18:8,11,18 guardian 43:21 gun 17:18,20 18:3 19:8 29:5 31:9 41:15,18 guns 28:17 31:23 39:22 <hr/> H <hr/> H 4:2 half 15:11 halfway 30:13 hand 10:22 11:4 handwritten 32:4	happen 14:13 happened 41:4 happens 37:9 happy 13:15 HARRIS 1:4 head 13:8 heading 53:4 health 43:13 heard 17:25 27:21,25 help 29:21 hereof 53:4 54:6 hereto 5:4,17 6:3,8,13,18 54:5 Higbie 1:1,4 2:1 3:1 4:1 5:1 6:1 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1,4 highest 15:22 hike 34:14 hiking 34:14 35:15 hold 33:3 39:12 home 28:12,14,15 31:23 44:9 homes 34:23 honestly 29:15 honor 48:22 honored 48:24 hoping 49:17 host 40:8 hour 23:22 house 34:15 houses 34:24 Hudson 2:18 huh-uh 13:9 hundred 18:23 26:19,20 hung 37:16 hunting 31:10,16 34:14 husband 45:4 <hr/> I <hr/> idea 25:6
---	---	---

identification 22:10 identity 7:17 illegal 43:5 illness 43:10 image 21:20 implements 34:21 implied 47:16 in-person 23:22 incident 45:15 include 14:22 29:21 including 5:7 6:20 21:3 42:11 inclusive 54:10 Index 1:7 55:4 individual 41:5 51:6 individuals 44:24 information 40:14,21,24,25 44:6 46:8 informed 46:2 initial 41:2 injured 45:15 inquire 37:24 39:16 instance 19:15 institution 43:13 instructions 12:3 Int'l 54:11 International 7:12 35:9 55:2 interrogatories 22:15 31:2 interrogatory 14:5 interview 24:20 interviewed 24:17 25:13,16 investigated 42:16,21 investigating 25:4 investigation 42:21 investigations 42:24 invoke 51:25 involved 39:19 issuance 23:6 24:24 30:2 issue 51:3 issued 23:4 31:12,15 32:9 47:25 50:6 issues 29:9 31:19	10:11,13 11:1,17 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1,4 Jared 40:9 jared@gunsandgadgets.c... 40:10 job 35:2 JOHN 1:15 join 19:2 JOSEPH 1:4 justice 43:3	League 17:20 learned 36:6 leave 38:24,25 Lebanon 34:19 legal 32:15 let's 12:19 23:12,12 44:23 level 15:22 license 4:6,7 20:22 21:25 22:4,16,22,24,25 23:4,15 23:19 24:13,25 27:10 28:8 28:11 29:2 30:2,21 31:4,12 31:14,18,20 32:3,5,9 33:7 33:10,12 34:3,8 36:5 37:25 39:25 43:16,19 45:23 46:12 48:11,19,22,24 49:7 licenses 21:3 23:6 29:9 33:3 33:18 47:19 50:6 licensing 42:2 49:4 life 12:21 32:20 49:2 limited 35:15 lines 18:20 list 42:5 litigation 7:21 8:10 little 15:8 27:7 36:15 live 15:4,16 23:23 34:9,22 36:8 37:9,15 lived 15:7,9,15,19 35:23,25 39:25 local 24:15 location 7:10 locations 7:9 log 38:17 long 13:14 15:7,9 17:11 18:7 28:17 37:20 longer 22:23 23:25 look 48:5 looked 14:5 38:16 46:21 looking 14:8 30:2 39:24 48:15,23 looks 23:4 39:3 51:2 lot 34:13
<hr/> J	<hr/> K	<hr/> M
J 1:13 2:14 James 1:1,8 2:1,8,11 3:1 4:1 5:1 6:1 7:1 8:1 9:1 10:1,10	kind 22:19 36:7 know 12:10,22 13:13 14:6,11 14:12 19:16 21:9 25:7,9 27:22,25 28:4 29:8,13 32:14,17 36:7,8 37:8,13,14 37:16 41:8,14,16 42:19 45:25 47:3,7,11 49:3,11 50:5,23 Krapf 1:13 2:14 10:19 KYLE 1:10	M-I-C-H-A-E-L 11:7 MAD/TWD 1:7 55:4 magazine 29:6 mail 19:25 20:2 24:11 27:9
<hr/> L	<hr/> L	
L.T.C 21:19 25:18 26:23 Lainson 1:24 54:2,14 lake 34:24 land 36:9 lands 22:19 large 29:2,4,10,12,18 30:6 largest 29:18 late 37:2 law 2:4 5:7,23 6:4,19 7:20 20:15 27:11 30:24 31:19 36:4 38:5 42:16,20 lawful 30:14 31:21 32:15 lawsuit 33:24 39:20 41:8,12 41:15 48:10,16 49:8,12 layman's 17:4	lawful 30:14 31:21 32:15 lawsuit 33:24 39:20 41:8,12 41:15 48:10,16 49:8,12 layman's 17:4	

mailed 24:14 46:7 maintain 20:21 major 16:15 manage 43:22 management 16:8 manager 16:25 manner 7:18 March 15:18 mark 22:7 marked 4:3 7:24 22:9 28:21 married 20:10 44:11 Mass 30:24 Massachusetts 15:6,10 16:23 17:22,24 18:4 20:23 22:16 22:25 23:7,15,24 24:5 28:3 28:5,8,10,13,25 29:8 30:19 33:10,12 36:18 40:2 42:18 48:24 50:21 master's 15:24 16:2,6 materials 54:11 matters 8:10 Matthew 2:10 10:8 11:14 55:6,13 Mayor 46:20 mean 17:23 18:5 30:18 31:8 48:20 means 8:15 9:4,6 30:22 media 14:24 meeting 7:11 member 17:19 18:8,18 19:8 45:20 membership 18:4,11 memberships 17:18 mental 43:9,13 mentioned 25:2 message 38:25 Michael 1:1,5,18 2:1 3:1,3 4:1 5:1 6:1 7:1 8:1 9:1 10:1 11:1,2,6 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1,20 51:1 52:1 53:1,3,9	54:1,3 55:1,5,25 Microsoft 1:21 military 17:8 minutes 49:17 misdemeanor 42:11 Mission 16:20 Mississippi 2:7 money 27:8 motion 5:13 7:2 mouth 36:7 move 5:8,11 6:22,24 moved 32:5 multitude 34:10,21	noted 53:4,6 notion 13:6 notwithstanding 8:7 November 15:3 number 54:9 55:4 numbered 21:13
O		
O 3:2,2 32:19 oath 7:13 8:25 object 5:7,10 6:21,24 obligation 8:8 obtain 16:2,4 27:18 30:5 45:22 obtained 23:14 obtaining 21:25 23:19 28:8 37:24 October 1:19 15:18 offense 42:8 office 2:9 10:9,12 11:15 16:22 36:21 39:14 55:12 officer 7:13 8:24 offices 37:24 Official 1:8,11,13 oh 17:15 20:7 26:5 Ohio 17:6 okay 11:3,23 13:5,20 14:3,10 14:15 15:9,16 16:9 17:3 18:7 19:4,18 20:4,7,14,25 21:11,17,21 22:3,6,24 23:3 23:12,17 24:17,20 25:12 27:22 28:7,24 30:10,17 31:8 32:11,18,25 33:6 37:20 38:3,21,24 39:7 40:15 41:11,14,17,23 42:7 42:23 43:2 44:3,5,11,13 45:6,10,14 46:7,14 47:22 48:18,23 49:21 50:15,15,22 50:22,25,25 51:4,6,8 52:6		
N		
N 3:2,2 4:2 name 11:5,14 44:8 55:4 nature 18:16 40:20 near 28:24 necessary 19:2 22:14 need 7:14 13:7,7,12,14 31:3 41:25 needed 23:20 51:6 never 20:2 43:24 47:23 New 1:3,10,12,15 2:9,13,15 2:18 11:15,16 15:20 21:24 21:25 27:18 33:25 34:2,7,9 34:10,12,16,19,25 35:2,11 35:16,17,18,20,21,23,25 36:3,5 37:25 38:8,18,22 39:4,14,16,25 41:25 44:6 44:18,21,24 45:8,20,23 46:3,7,12,15,17,18,23 47:3 47:8,17,18,23,25 48:2,11 48:24 49:7 50:6,8 55:12,14 news 27:20 46:19,21 newsletter 18:15 nice 37:10 52:8 nods 13:9 non-citizen 50:7,14 non-New 47:5 non-resident 47:15 50:13,15 non-residents 46:16 47:5,10 47:19 48:2 NORTHERN 1:3 notary 5:18,19 53:12 55:9 note 10:6		
once 35:6 online 14:23 25:18 open 23:25 opportunity 38:25 51:19 order 12:18 18:18 27:8 30:5 original 5:21 6:9 originally 36:6 other's 12:23		

out-of-state 37:8 outlined 30:23 outside 30:23 42:17 Owner's 18:3 Owners 17:20 41:15,18	place 7:14 9:2 24:21 53:4 54:4 plainest 12:14 plaintiffs 1:6 2:3 10:16 11:21 49:12 please 10:7,22 11:4,5 12:10 13:13 42:2 53:5 55:8,9 PLLC 2:4 podcast 40:9 point 13:13 14:20 22:17 39:9 police 1:10 11:17 24:3,14,15 25:23 26:21 27:9 30:21 38:18,22 39:4,14 45:20 policy 31:14 47:17 position 48:4 possession 8:3 19:20 possible 12:4 posterity's 45:19 pot 43:7 Practice 5:7,23 6:4,19 preparation 14:11,13 50:17 prepare 13:24 prepared 54:10 presence 54:4 55:8 present 7:5 8:21,25 45:14 presented 8:2 presenting 7:24 pretty 25:22 42:4 previous 19:7 22:5 previously 24:6 26:25 primary 17:21,24 print 25:17 prior 8:3 22:22,25 24:24 45:25 probably 37:15 42:3 47:21 process 23:11,13 24:18 25:5 25:10,16 27:2 28:5,5 37:8 48:7 processing 24:23 produce 24:6 produced 20:25 31:2 professional 43:16 Project 16:8 provide 8:22 40:23 44:14,25 provided 5:6,22 6:4,18 22:15 54:12 provisions 8:17,19,22	public 5:18,19 53:12 55:9 pull 21:7,8 purpose 7:21 30:15,22 31:21 purposes 6:4 31:5,22 32:15 44:17 pursuant 7:6 put 11:3 39:12 40:19
<hr/> P <hr/> P 3:2 p.m 1:20,20 10:3 49:23 52:11 page 28:21 32:8 54:5 pages 4:7 21:12 38:16 54:9 paid 27:8 paperwork 46:5 part 6:19 18:11 24:18 25:10 25:15,15 32:20 36:25 participate 8:15 participating 7:11 51:16 particularly 47:24 parties 5:4,16 6:2,7,12,17 7:5,19 8:5,13,24 55:10 party 8:9,9,15 9:5 pay 19:22 26:18,20 paying 41:11 payment 18:19 pending 13:17 18:15 Penn 16:3 people 12:22 36:8 pepper 29:15 Perfect 52:5 permit 27:19 28:18 42:18 44:18 46:8,9 47:9 permits 33:4 47:25 permitting 39:16 44:7 person 45:2,3 50:7 personal 42:3 personally 35:7 49:12 phone 21:23 38:17 39:10 phrase 55:16,17,18,19,20,21 55:22 physical 7:10 physically 8:21,25 46:4 pick 24:15 27:10 pistol 29:14 33:3 42:18 44:18 46:12 Pittsfield 15:5 16:23 27:6,12 37:9		<hr/> Q <hr/> question 5:8,11 6:21,24 8:5 12:6,12,13 13:16,17 32:2 45:18 47:6 50:16 questioning 8:4 questions 11:19 12:7,10,25 13:21 21:5 33:24 41:24 50:3 51:9,10,15,18 quick 49:19 quickly 42:4 49:18 quote 37:14
		<hr/> R <hr/> R 3:2 R.P.I 35:6,6 rabies 51:7 raise 10:21 ranges 31:9 re-categorized 29:4 reached 41:7 read 46:19 51:19,24 52:2 53:3 55:8 reason 13:16,20 23:5 28:7 45:10 reasonable 8:17,19 reasons 34:11,24 35:11 recall 26:15 36:20 37:17 38:6 receive 19:25 40:15 Recess 49:23 reciprocity 48:19,21 recognize 21:15,17 record 8:18 10:4,7 11:5 29:25 49:25 53:4 54:10 recorded 7:18 recording 7:18 recruit 35:4 recruited 35:6 recruits 35:5

redo 23:10 reference 48:18 referenced 29:23 references 25:22 44:15,19,20 45:7 referring 30:25 refreshes 17:5 Regard 26:24 regarding 8:4 26:24 36:4 38:7 regards 21:25 29:14 remember 14:8 18:23 20:11 22:21 26:2 29:15 30:10,11 30:12 37:21 39:2,11 remote 7:9 8:14 9:4 remotely 7:15 renew 26:21,22 27:14 31:20 renewal 22:20 27:2 renewals 26:24 renewed 27:12 Rensselaer 1:12 36:14,15,21 38:9,12 39:13 47:4,9,14 repeat 47:6 rephrase 12:11 Reported 1:24 reporter 7:8,16 10:4,14,20 11:3,8 12:18 13:8 22:8 49:25 51:20 54:14 Reporters 7:12 54:11 55:2 represent 11:16 21:11 representing 6:14 requesting 9:5 requests 21:2 require 28:13,18 44:21,24 required 28:11 44:6 requirement 28:2 42:2 requirements 19:5 23:19 27:18 39:17 requires 37:11 42:20 reserved 5:9,13 6:23 7:3 reside 24:4 residency 44:22 resident 31:15 37:8,12 50:8 residents 45:8 47:5 residing 44:8 respective 5:4,16 6:2,7,12,17 responded 40:20,21,25	responses 13:6,10 responsive 39:10 rest 48:3 52:8 restrict 30:21 restriction 31:5,16,23 restrictions 30:14,23 32:12 32:16,22 resulted 20:18 Resumed 49:24 retired 45:19 return 5:20 55:11 review 14:4 revoked 33:15 43:16,19 Ridge 2:6 rifle 17:18 19:8 right 5:7 6:21 10:22 25:25 26:3 28:25 34:4 39:11 49:4 50:11 51:19,23,25 52:4 rights 5:6,22 6:18 ROB 2:16 Robert 10:17 roughly 24:12,22 26:17 rounds 29:6 Rule 5:22 Rules 5:7,23 6:5,19,20 run 42:4 runs 12:3	self-defense 28:9 31:24 sells 34:19 seminars 18:16 send 40:3,11 sense 12:15 13:3,10,18 sent 27:9 50:24 separate 7:9 series 41:24 serious 42:8 service 17:13 session 12:6 23:21 set 26:3 seven 51:7 share 21:4 sheet 53:7 sheriff 1:10,12,13,14 34:6 36:10,11,13,22 37:6 46:2 sheriff's 36:21 37:24 39:14 shift 23:9 shot 40:13 45:15 shots 51:7 shoulder 13:8 show 22:13 31:3 showed 38:16 shrugs 13:8 sign 51:19,24 52:2 55:8,10 signature 55:11 Signed 55:24 signify 29:2 similar 28:2 simple 12:5 sir 11:22,25 12:16 13:4,11,19 13:23 14:2,9,14,18,21,25 15:2,14,21 16:18 17:10 18:6,21 19:3,6,9,10,11,13 20:20,24 21:6,16 22:18 23:2,16 24:19 26:14 27:15 28:19,23 29:11,19,24 30:4 30:12,16,19 31:7,25 32:6 32:10,13,21,24 33:2,5,8,11 33:14,16,20,23 35:13,19,22 36:2 37:4 38:2,20,23 39:6 39:18 41:3,8,13,19,22 42:6 42:9,12,15,25 43:4,6,8,11 43:14,17,20,23 44:2,4,10 44:12 45:5,9,13,17,21,24 46:6,10,13 48:13,17 49:10
S		
S 3:2 sake 45:19 sat 24:7 26:10 says 23:8 30:14 32:11 schemes 49:5 screen 21:8 screenshot 4:6 21:23 36:24 screw 25:3 scroll 21:12 search 50:17 seconds 37:22 section 7:6 security 42:19 see 12:17 21:9,10 28:22 30:14 31:3 32:8,11 seek 40:24 seeking 48:10 select 30:7		

<p>49:11,13,15 51:13 sit 27:5 47:2 situation 45:4 six- 24:12 sixty- 47:13 sixty-one 47:13 slowly 21:13 small 15:14 26:2 Smith 23:23 snippets 27:20 social 14:24 somebody 38:11 40:3 Somewhat 35:3 sorry 20:4 24:14 27:22,24 35:24 sort 26:2 34:16,17 sounds 29:17 South 19:15 20:6,7,8 speak 14:10,13,15 speaking 51:12 specific 38:10 specifically 30:7 33:24 35:3 38:7 46:4 48:15 specify 8:18,20 spell 11:4 spend 34:13 spent 43:13 Spike 2:6 spoke 14:12 36:21 spoken 49:14 sporting 31:5,9,16,22 spot 25:25 26:3 spouse 44:8 45:3 spray 29:15 Springfield 23:24,25 STAMBOULICH 49:21 51:17 52:5 Stamboulieh 2:4,5 10:15,15 41:7 standard 25:23 standing 31:14 start 12:2 state 1:10 2:9,17 11:4,16 15:20 16:3 21:24,25 23:8 24:14 25:19 26:21 27:8,18 33:7,25 34:3,14,15 35:2,12 35:18,21,21 36:4 38:5,10</p>	<p>38:18,22 39:4,14,25 44:7 44:18,21,24 45:8,20,23 47:4,8,17 48:3,12,25 50:8 53:2 55:12 state's 48:22 stated 54:5 statement 47:17 states 1:2 8:12 33:4 42:5 49:3 station 24:7 34:19 status 32:19 33:17 step 12:23 Stephen 2:5 10:15 Steven 1:8 2:8 10:10 11:17 Steward's 34:18 Stewards 35:15 stint 15:14 stipulate 8:13 stipulated 5:3,15,25 6:6,11 6:16 7:4,23 8:24 stipulation 8:16 STIPULATIONS 5:2 store 34:20 story 50:20 Street 2:17 15:5 strike 5:9,11 6:22,25 stuff 18:16 25:23 subcategories 29:22 31:17 Submarines 17:7 submit 44:6 46:5 subsequent 23:6 suffered 43:9 sufficient 49:7 suing 33:25 summons 19:25 superintendent 1:9 10:13 11:16 supply 8:8 44:19 sure 12:3,4 25:21 47:7 48:8 51:20 surprise 50:5 surprising 50:10 suspended 33:13 swapped 36:15 swear 10:5,22 sworn 3:3 5:17 7:15 11:2,9 53:11 54:7</p>	<p>systems 16:20,25 17:2</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>T 4:2 take 13:8,17 24:2,13,21 27:13 33:21 35:2,11 42:2 44:23 49:17,19 taken 8:14 49:23 53:4 54:3 talk 12:19 23:12 39:24 talked 38:15 talking 26:8 taste 37:15 Teams 1:21 Tech 16:11,13 technology 17:5 telephone 8:14 9:4 telephonic 9:3 tell 38:11 ten 29:6 tend 12:23 36:14 term 31:18 terms 12:14 17:4 testify 54:7 testifying 6:15 testimony 5:9,11 6:22,25 10:23 53:4 54:3,6 55:8 thank 10:14,20 11:8,10,18 17:16 22:11 29:20,20 37:16 45:18 49:22 51:4,9,13,15 52:6 theirs 27:6 thing 18:13 38:10,10 things 12:20 49:20 think 17:21 23:24 24:12 26:9 37:14 39:12 40:18 45:11 49:17 52:3 third 32:8 thirteen 15:11,12 thirteenth 17:13 thirty 37:22 55:9,10 Thompson 2:11 10:11,11 three 18:9 21:12,14 39:4,8 time 1:20 11:18 13:13 14:20 20:8 22:17 23:14 24:4 26:21 33:22 34:14 36:23 40:18 43:13 50:24 51:9,12 53:4 54:4</p>
--	--	--

times 27:5 39:4 timestamps 36:24 today 11:18 12:9,18 13:6,14 13:22 14:17 47:2 51:10,12 51:15 told 19:24 25:11,12 34:3,5 47:12 top 28:24 totally 51:21 town 24:4 25:20 26:2 31:13 31:15 38:10 towns 36:16,18 traffic 20:16,17 training 19:4 23:21,23 27:14 28:2 transcribed 51:21 transcript 8:8 12:19 53:5,7 55:8,10,11 transcription 54:9 travel 35:8 traveling 35:15 tree 39:10 trial 5:13 7:3 trick 12:9 Troy 34:22 35:6 true 53:5,7 54:10 truly 25:6 truth 10:23,24,24 54:7,7,8 truthfully 13:22 try 12:9,11,19 39:7 trying 45:22 twelve 24:23,24 twenty 17:2 twice 24:10 two 23:6 26:17 36:16,18 type 22:20 types 28:14 typewritten 54:8	understand 11:19 12:5,10 13:21 30:17 48:21 49:3 understanding 27:17 36:3 46:15 48:19 understood 12:13,13 unfortunately 37:11 Uniform 6:19 United 1:2 42:5 unofficial 31:14 unrestricted 29:19 update 32:4 use 8:19 43:5,7 45:11 usually 35:8 50:8 utilized 6:3 18:13	violation 7:20 42:11 violations 20:16,17 Virginia 16:11,13 20:5 visit 34:12 visiting 34:23 visits 35:16 volition 38:13,14
<hr/>		
W		
<hr/>		
		wait 24:13 waive 51:23 52:4 waived 6:10 waiver 5:12,22 7:2 walk 25:23 walked 24:8 want 11:17 14:11,12 18:9,22 18:23 26:21 33:23 34:7 41:6 50:13 51:22,24 wanted 34:2 warrant 42:13 wasn't 51:3 watched 40:7 watching 39:21 way 12:11 45:11 We'll 42:3 we're 12:4 30:2 49:25 weapon 45:11,16 website 25:19,20 week 24:13 41:7 weekend 52:8 weekly 18:15 weeks 24:23,24 went 25:20 49:18 Wesson 23:23 western 36:17 Where'd 16:9 wife 45:5 willing 44:6 52:4 witness 5:18 6:14 7:8,9,14,15 7:25 8:2,4 10:5 11:2,6,8 51:13 52:3,9 54:6 witness's 7:16 word 36:7 55:16,17,18,19,20 55:21,22 words 12:23 work 34:25 35:11,16 37:12 42:20 46:16 50:24
<hr/>		
V		
<hr/>		
v 1:1,7 2:1 3:1 4:1 5:1 6:1 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1,4 V-E-O-T-R-U-B-A 11:7 vague 27:25 Vanguard 17:6 VENUE 1:21 Veotrubia 1:1,5,18 2:1 3:1,3 4:1 5:1 6:1 7:1 8:1 9:1 10:1 10:25 11:1,2,6,13 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1,13 22:1,13 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1,3,20 51:1,18 52:1,7 53:1,3,9 54:1,3 55:1 55:5,7,25 verbal 13:7,10 video 7:7 8:7 39:21,23 40:3,7 videoconference 7:11,17		
<hr/>		
U		
<hr/>		
uh 36:8 uh-huh 13:9 ultimately 48:10 unauthorized 7:20 undergrad 16:10 underneath 28:25 underscore 21:13		

worked 35:20 36:9	37:1 38:1 39:1 40:1 41:1	8
working 46:20	42:1 43:1 44:1 45:1 46:1	800 55:2
would've 24:22 36:23 42:21	47:1 48:1 49:1 50:1 51:1	9
wouldn't 35:11	52:1 53:1 54:1 55:1,5	
wrap 49:20	1003 15:5	
written 7:19	11 3:4	
X	12224 2:13 55:14	
X 1:17 3:2 4:2,2 53:8,12	12534 2:18	
Y	16th 15:3	
Yeah 28:19 51:4	18 1:19	
year 20:11 22:21 24:2	1988 15:3	
years 15:8,11,13 18:9 23:8	2	
31:18	2011 16:14	
York 1:3,10,12,15 2:9,13,15	2012 22:18,25 23:13 31:4	
2:18 11:15,16 15:20 21:24	2013 22:16,18,25 23:3,13	
21:25 27:18 33:25 34:2,7	31:4	
34:10,10,12,16,25 35:2,11	2014 15:18 16:5 20:13 50:18	
35:16,17,18,20,21,23,25	2015 15:18 20:13	
36:4,5 37:25 38:8,18,22	2017 23:5 30:2 31:12	
39:4,14,16,25 42:2 44:7,18	2023 23:5 30:3 32:9 37:2	
44:21,24 45:8,20,23 46:3,8	2024 1:19 53:11	
46:12,15,17,18,23 47:4,5,8	2029 32:9	
47:17,18,24,25 48:2,12,25	22 4:5	
49:7 50:6,8 55:12,14	221 6:19	
YouTube 39:22	24-CV-0174 1:7 55:4	
Z	3	
zero 21:14,14,14,14	3 4:7	
0	30 55:9,10	
1	3113 8:11	
1 54:5,9	3113(d) 7:6	
1-10 1:15	3116 5:22	
1:01 1:20 10:2	3117 5:23	
1:49 49:23	39046 2:7	
1:51 49:24	4	
1:53 1:20 52:10	402 2:17	
10-18-24 1:1 2:1 3:1 4:1 5:1	417 2:6	
6:1 7:1 8:1 9:1 10:1 11:1	5	
12:1 13:1 14:1 15:1 16:1	52 54:9	
17:1 18:1 19:1 20:1 21:1	523-7887 55:2	
22:1 23:1 24:1 25:1 26:1	6	
27:1 28:1 29:1 30:1 31:1	7	
32:1 33:1 34:1 35:1 36:1		