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Carl Higbie v S	teven G James – 10-	-23-24 – Carlton Higbie IV	1	Carl Higbie v Steven G James – 1	0-23-24 – Carlton Higbie IV
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NORT	HERN DISTRICT O	F NEW YORK	3	CARLTON HIGBIE IV; Sworn	
CARL HIGBIE,	JOSEPH HARRIS,	and	4	Direct Examination by Mr. Thomp	oson 12
MICHAEL VO			5		
Plaintiffs,	ŗ		6		
V	Civil Action No	.:24-CV-00174	7		
STEVEN G. JA	MES, in his Official		8		
Capacity as Sup	erintendent of the		9		
	Police, SHERIFF K	YLE	10		
	in his Official Capa		11		
	Rensselaer County,	•	12		
	RIFF DONALD J. I		13		
in his Official C		,	14		
	nbia County, New Y	ork.	15		
and JOHN DOE	-	,	16		
Defendants.	,		17		
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DEPOSI	FION OF: CARLT		19		
DATE:	October 23, 202		20		
TIME:	10:04 a.m. to 11		21		
VENUE:	Microsoft Tea		22		
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Reported by Pau	il McAloon		25		
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2 APPEARANCES:		0	2	EXHIBIT INDEX	e
3 FOR HIGBIE A	ND HADDIG.				
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4 STAMBOUL	IEH LAW, PLLC		3 4		
		ESQ.		Described as	42
	IEH LAW, PLLC EN STAMBOULIEH,	ESQ.	4 5	Described as One	42
5 BY: STEPH 6 P.O. Box 428	IEH LAW, PLLC EN STAMBOULIEH,	ESQ.	4	Described as	42 51
5 BY: STEPH 6 P.O. Box 428	IEH LAW, PLLC EN STAMBOULIEH, Mississippi 38654	ESQ.	4 5 6	Described as One Higby 001 Mr. Higbie's license	51
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2 STIPULATIONS		2	be a bar or waiver to make such	n motion at, and is
3 IT IS HEREBY STIF	PULATED AND AGREED by	3	reserved to, the trial of this acti	on.
4 and between counsel for the re	espective parties hereto	4	IT IS HEREBY STIP	ULATED AND AGREED by
5 that:		5	and between counsel for all par	ties present that
6 All rights provided b	by the Civil	6	pursuant to CPLR section 3113	(d) this deposition is
7 Practice Law and Rules, includ	ding the right to object	7	to be conducted by video confe	rence, that the court
8 to any question, except as to fo	orm, or to move to	8	reporter, all counsel, and the wi	
9 strike any testimony at this exa	amination is reserved.	9	separate remote locations (exce	pt the witness and his
10 And, in addition, the failure to	object to any	10	counsel are in the same physica	al location) and
11 question or to move to strike to	estimony at this	11	participating via videoconferen	ce 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 t	the trial of this	13	(ARII), that the officer adminis	stering the oath to
14 action;		14	the witness need not be in the p	blace of the
15 IT IS FURTHER ST	IPULATED AND AGREED by	15	deposition and the witness shal	l be sworn in remotely
16 and between counsel for the re	espective parties	16	by the court reporter after confi	rming the witness's
17 hereto, that this examination m	nay be sworn to by the	17	identity, that this videoconferer	nce will not be
18 witness being examined before	e a Notary Public, other	18	recorded in any manner and that	
19than the Notary Public before		19	the express written consent of a	-
20 was begun, but the failure to d	o so, or to return the	20	considered unauthorized, in vic	blation of law, and
21 original of this examination to	counsel, shall not be	21	shall not be used for any purpos	se in this litigation
deemed a waiver of the rights		22	or otherwise.	
and 3117 of the Civil Practice	Law and Rules, and	23	IT IS FURTHER STIL	PULATED that exhibits
2.4 shall be controlled thereby;		24	may be marked by the attorney	presenting the exhibit
25 IT IS FURTHER ST	IPULATED AND AGREED by	25	to the witness, and that a copy of	of any exhibit
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1 Carl Higbie v Steven G James –		Associa	ted Reporters Int'l., Inc. Carl Higbie v Steven G James – 1	
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1 Carl Higbie v Steven G James –	10-23-24 – Carlton Higbie IV spective parties	1	Carl Higbie v Steven G James – 1	0-23-24 – Carlton Higbie IV e-mailed to or
1 Carl Higbie v Steven G James – 2 and between counsel for the re	10-23-24 – Carlton Higbie IV espective parties nay be utilized for all	1 2	Carl Higbie v Steven G James – 1 presented to a witness shall be	0-23-24 – Carlton Higbie IV e-mailed to or ounsel prior to any
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2	the place of the deposition and the additional costs	2	very much. Before I depart, if I could just have the
3	of conducting the deposition by telephonic or other	3	attorneys' state and spell your name for the record?
4	remote electronic means, such as telephone charges,	4	Give us your firm name and address as well. We can
5	shall be borne by the party requesting that the	5	start with Mr. Stamboulieh.
6	deposition be conducted by such means.	6	MR. STAMBOULIEH: Sure. Stephen
7	deposition be conducted by such means.	7	Stamboulieh for the plaintiffs, Stamboulieh Law,
8		8	P.L.L.C., P.O. Box 428 Olive Branch, Mississippi
9		9	38654.
		10	
10			THE NOTARY: Thank you. Mr.
11		11	Fitzsimmons?
12		12	MR. FITZSIMMONS: Sure. Robert
13		13	Fitzsimmons, F-I-T-Z-S-I-M-M-O-N-S, Columbia County
14		14	Attorney, 401 State Street, Hudson, New York 12534.
15		15	THE NOTARY: Thank you. And Mr.
16		16	Gallagher.
17		17	MR. GALLAGHER: Matthew Gallagher on
18		18	behalf of Stephen James from the New York State
19		19	Office of the Attorney General, the Capitol, Albany,
20		20	New York 12224.
21		21	THE NOTARY: Thank you. And Mr.
22		22	Thompson.
23		23	MR. THOMPSON: Sure, thanks. James
24		24	Thompson, T-H-O-M-P-S-O-N also from the Office of the
25		25	Attorney General on behalf of Superintendent James,
	5		D 11
	Page 9		Page 11
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2 3	(The deposition commenced at 10:04 a.m.)	2 3	28 Liberty Street, New York, New York 10005. THE NOTARY: Okay. Thank you. Your
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2	you give me an answer I'll assume that you understood	2	A. Today, yes.
3	the question.	3	Q. Have you ever been deposed
4	A. Okay.	4	before?
5	Q. Great. Please make sure all your	5	A. Yes.
6	answers are verbal. In, you know, regular	6	Q. When?
7	conversation we say things like uh-huh and huh-uh or	7	A. Ballpark in the last five years
8	shrug our shoulders or shake our head. None of that	8	twice. Once for a a civil suit with my neighbor
9	necessarily comes through on the court reporter's	9	and then recently well, that was the recent one.
10	transcript so make sure you're saying yes or no or	10	Maybe five years before that during a divorce
11	or otherwise verbally responding to the question.	11	proceeding.
12	From time to time your attorney may	12	Q. And any time before that?
13	make an objection. Unless your attorney instructs	13	A. Not not that I can recall.
14	you not to answer, based on a claim of privilege, you	14	Q. And the civil dispute with the
15	should you should still answer the question that I	15	neighbor, what's the name of that case?
16	asked. And, lastly, if you need to take a break at	16	A. That would be Higbie versus
17	any time just ask me and we'll take one. I'll ask	17	Aurora. We actually just won that ruling, so it's
18	you to finish responding to the question or to the	18	been concluded.
19	line of questioning presented but happy to stop off	19	Q. And what what court would that
20	and take a break at any time you want. Hopefully, we	20	be in?
21	won't be here that long. But, you know, should you	21	A. Stamford Superior.
22	need to take five don't hesitate to let us know.	22	Q. Okay. And the divorce
23	Does that all make sense?	23	proceeding, what what court was that in?
24	A. Yes.	24	A. Also Stamford.
25	Q. Great. So, Mr. Higbie, what's	25	Q. So do you understand that you're
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1	Carl Higbie v Steven G James – 10)-23-24 – Carlton Higbie IV	1	Carl Higbie v Steven G James –	10-23-24 – Carlton Higbie IV
2	Q. And do you have a	a set of notes	2	A. No.	
3	independent of that?		3	Q. Could we reques	st a copy of the
4	A. No.		4	video?	1.
5	Q. Okay. Other than	vour	5	A. You'd have to pa	av for a Newsmax
6	interrogatories, have you review		6	subscription but, yes, you cou	•
7	- in preparation for today's depo		7	Well, you can fill ou	•
8	A. None other than th		8	request in the course of in the	
9	had submitted to you.	le ones that we	9	this litigation if we need to. If	
10	Q. So is that any doct	un anto Ilm	10	-	-
	•		11	you want to produce voluntari	
11	trying to understand if there's an			Q. Mr. Higbie, we	
12	addition to those interrogatories		12	your your picture on the we	
13	A. Not to my knowled	-	13	I'm getting what looks to be a	
14	Q. Okay. Did you me		14	A. It keeps connect	
15	Stamboulieh to prepare for toda	• •	15	keeps connecting to the phone	
16		H: I'm going to object.	16	it does that I'll just keep pushi	-
17	I'm going to object just to the ex	tent that he's	17	Q. Gotcha. Thank	
18	asking for anything that we spol	ke about, otherwise	18	know, a brave new world of v	irtual depositions. So
19	you can answer the question.		19	other than your attorney and o	n your show have you
20	A. I did speak with hi	im yesterday.	20	discussed this deposition with	anyone?
21	BY MR. THOMPSO	N: (Cont'g.)	21	A. Just my wife.	
22	Q. For about how lon		22	Q. And other than	your attorney and
23	•	H: Come on. I'm going	23	on your show have you discus	
24	to object to that. You don't need		24	anyone?	
25	we spoke.	a to know now long	25	A. Yes.	
2.5	we spoke.		2.5	A. Its.	
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3	A. I couldn't answer th	nat. I don't	3	went and fought for overseas.	
4	know.		4	Q. And so when yo	u sav vou've mat
5	Q. How did you choos	se Mr. White to	5	asked in multiple jurisdictions	
6	take the safety course with?	se ivii. White to	6	are you referring to?	, which jurisdictions
7	•	adad through my	7	A. Dutchess Count	v Danssalaar
	A. He came recommen	nded through my	8	County, Putnam County, Wes	
8	gun club.	4 .0			tenester County, and In
9	Q. Which gun club is		9	Manhattan.	
10	A. It is Campfire Club		10	Q. So why don't we	
11	Q. And is that club bas	sed in New	11	before we before we discuss	
12	York or Connecticut?		12	actually submitted a application	
13	A. Hold on. Let me di	isconnect you	13	permit at any of these location	ls?
14	again. You know what, I'm just	going to point my	14	A. I attempted to or	nline a while
15	phone at me in case the next time	e that happens, so.	15	back but it didn't allow me to	proceed because I
16	Sorry, could you repeat the quest	tion?	16	didn't have a New York State	driver's license.
17	Q. Sure. Where is v		17	Q. And with which	jurisdiction was
18	gun club based?		18	this?	
19	A. Chappaqua, New Y	ork.	19	A. I believe it was	Westchester
20	Q. And other than Mr.		20	County.	
21	have you discussed this case with		21	Q. And did you eve	er try to submit an
22	•		22	•	•
	A. Asked and answere			application either online or in	person with any other
23	Q. Sir, you're the depo		23	New York State jurisdiction?	
24	don't think that's an objection that		24	A. I inquired in pol	
25	raise. You said you spoke with r	nany people. You	25	all the counties I mentioned.	And all of them turned
		Page 21			Page 23
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1	Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV	1	Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV
2	Instead of shooting their guns I'd like to bring my	2	to at Rensselaer County?
3	own but it's not lawful for me to bring pistols into	3	A. No, it would have been whoever
4	the state. So I inquired at a local police station	4	was at the front desk of the police precinct.
5	somewhere up in the in the Wingdale area where	5	Q. And do you recall what precisely
6	their property is and they told me to don't even	6	you were told?
		7	A. Similar to what I was told
7	bother.		
8	Q. Do you recall who it was that you	8	everywhere else.
9	spoke to?	9	Q. How about Westchester County.
10	A. No.	10	When did you speak with them?
11	Q. And do you call do you recall	11	A. Westchester County was more
12	precisely what they said?	12	recent. After the Bruen decision came down, the
13	A. Just that I didn't live there, I	13	Supreme Court Bruen decision, I walked into port
14	didn't own property there, I'm not a resident of New	14	the Port Chester police station which is the closest
15	York. It's don't even bother.	15	police precinct to where I live which is right over
16	Q. And this was in 2016 you said, is	16	the line from Greenwich. And I wanted to apply for a
17	that correct?	17	permit based on the Bruen decision. And I was
18	A. Around 2016.	18	literally laughed out of the police station and told
	A. Around 2016.O. So let me ask about Putnam		
19		19	that they they won't be honoring anything because
20	County. When did you speak with them?	20	they have no rules changes and they don't know what
21	A. It would have been shortly after	21	to do.
22	that. Hang on this I don't know what is going on	22	Q. And when you say the Port Chester
23	here.	23	police station, do you know what law enforcement is
24	Q. So also around 2016 and 2017?	24	that? Is that a a local police, is that county
25	A. Correct. It would have been in	25	police?
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2	wouldn't be the place I'd apply.	2	to proceed until I have that and I don't have that.
3	Q. Did you ever and you you	3	Q. Have you ever spoken with the New
4	said you spoke with New York City police department,	4	York State police about firearms licensing?
5	is that correct?	5	A. No. I let me rephrase that.
6	A. Correct.	6	I do believe I called them post Bruen to ask and I
7	Q. When was this?	7	was met with we don't even have a rules update for it
8	A. This is post Bruen as well.	8	yet.
9	Q. So around 2022?	9	Q. And do you recall who you spoke
10	A. On or around, yeah.	10	to?
11	Q. Do you recall who you spoke with?	11	A. No.
12	A. No.	12	Q. Do you recall anything more about
13	Q. And what did you what what	13	the conversation?
14	did you tell them and what did they tell you?	14	A. No.
15	A. I asked the same question. I'd	15	Q. Do you know if the New York State
16	like to get a pistol permit, how do I go about it	16	police has any role in deciding firearms license
17	because I can't proceed online because I don't have a	17	applications?
18	New York State driver's license and they just	18	A. Apparently nobody has any role
19	shrugged their shoulders and said you don't apply	19	so, no, I don't know who is in charge.
20	here. We don't know what to tell you. That's	20	Q. And are you a retired member of
21	that's above our pay grade.	21	the Division of State Police?
22	Q. Did you tell them that you worked	22	A. No.
23	in New York City?	23	Q. Other than the ones that we
24	A. I did.	24	mentioned, have you spoken with any other New York
25	Q. And what did they how did they	25	counties or New York law enforcement institutions
20		20	
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2	Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV respond to that?	1 2	Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV about firearms licensing?
2 3			
	respond to that? A. Doesn't matter.	2	about firearms licensing?
3	respond to that?	2 3	about firearms licensing? A. Not off the top of my head, no. Q. So do you know if any of the
3 4	respond to that? A. Doesn't matter. Q. You know, I I will would it surprise you to know that many people who work in New	2 3 4	about firearms licensing? A. Not off the top of my head, no. Q. So do you know if any of the other counties in New York would accept an
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1	Carl Higbie v Steven G James – 1	0-23-24 – Carlton Higbie IV	1	Carl Higbie v Steven G James –	10-23-24 – Carlton Higbie IV
2	City license and got one, would	In't that essentially	2	illness?	
3	give you everything you want fi	•	3	A. No.	
4	A. It would, but my u		4	Q. Have you ever b	been committed or
5	that this is sometimes as long as	-	5	spent time in a mental health	
6	Q. Do you know how		6	A. No.	
7	take?	w long it will	7	Q. Have you ever h	and any
		11	8		
8	A. I've been instructe	• • • •		professional license suspende	d of revoked?
9	permit instructor, who's been go		9	A. No.	
10	before, he says sometimes it's a		10	Q. Have you ever h	had a driver's
11	months to get in front of a judg		11	license revoked?	
12	get a fingerprinting appointmer		12	A. No.	
13	Q. And I apologize, t	this gentleman's	13	Q. You testified the	at you served in
14	name has slipped my mind, Tor	m, what was his name?	14	the military, correct?	
15	A. Tom White.		15	A. Yes.	
16	Q. Tom White. And	is he a	16	Q. Was your discha	arge honorable?
17	representative of New York Cit		17	A. Yes.	C C
18	A. No, he just teache		18	Q. Have you ever h	nad a guardian
19	course that you guys require.	is the survey	19	appointed for you to manage	•
20	Q. Okay. So I got to	ask vou a	20	A. I'm sorry, you	
		•			
21	number of questions. I apologi		21	little bit there. Say that one n	
22	a little personal. They're variati		22	Q. My apologies.	
23	theme as you'll as you'll see.	Sir, are you over	23	a garden guardian appointe	d for you to manage your
24	twenty-one?		24	affairs?	
25	A. Yes.		25	A. No.	
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Associate 1 2 3	Carl Higbie v Steven G James – 1 Q. Are you a United A. Yes.	0-23-24 – Carlton Higbie IV States citizen?	Associa 1 2 3	ated Reporters Int'l., Inc. Carl Higbie v Steven G James – Q. Have you ever b assault?	www.courtsteno.con 10-23-24 – Carlton Higbie IV been convicted of
Associate 1 2 3 4	Carl Higbie v Steven G James – 1 Q. Are you a United A. Yes. Q. Have you ever rer	0-23-24 – Carlton Higbie IV States citizen?	Associa 1 2 3 4	ated Reporters Int'l., Inc. Carl Higbie v Steven G James – Q. Have you ever b assault? A. No.	www.courtsteno.con 10-23-24 – Carlton Higbie IV been convicted of
Associate 1 2 3 4 5	Carl Higbie v Steven G James – 1 Q. Are you a United A. Yes. Q. Have you ever rer citizenship?	0-23-24 – Carlton Higbie IV States citizen? nounced your	Associa 1 2 3 4 5	ated Reporters Int'l., Inc. Carl Higbie v Steven G James – Q. Have you ever b assault? A. No. Q. Have you ever b	www.courtsteno.com 10-23-24 – Carlton Higbie IV been convicted of nad a D.U.I.?
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1 Carl Higbie v Steven G James – 1	10-23-24 – Carlton Higbie IV	1	Carl Higbie v Steven G James –	10-23-24 – Carlton Higbie IV
2 Q. And so the folder	r that you're	2	upstairs well after midnight. M	My, at the time my
3 looking at right now, what is th	nat folder?	3	wife, who is now currently my	ex-wife, woke me up
4 A. It's a folder of the	e letters of	4	because she heard people on the	-
5 recommendation.		5	porch which was in an associa	
6 Q. For a firearms pe	rmit	6	I looked out the wind	
7 application?		7	trying to get into our backdoor	
8 A. Correct.		8	call the authorities and I went	
9 Q. Other than the let	tters of	9	sure that if they did come in th	
× ×		10	to get upstairs to at the my v	
5	-			
11 A. No. Just well, I take it b	•	11	the three children and their par	
12 pistol safety certification cours		12	our house at which point they	
13 Q. So is there any		13	believe the fourth intruder. An	nd it became a
14 provide a photograph and finge	erprints in connection	14	physical altercation.	
15 with your application?		15	I did not fire a shot b	
16 A. Yes.		16	my pistol in my hand and I wa	
17 Q. Is there any reaso	on to think that	17	the people without, you know	w, using any type of
18 a background check in New Ye	ork or any other state	18	lethal force.	
19 would flag anything that might	lead to the denial of	19	Q. And when you sa	ay subdue what does
20 a license?		20	that mean and and what hap	pened after?
21 A. No.		21	A. Subdue would m	
22 Q. And is there any	reason to think	22	incapacitate by restraint or, yo	
that you would use a weapon in		23	force. Put them on the ground	· 1 ·
endanger yourself or others?	i u wuy ulut would	24	proceeded to arrest the ones th	
25 A. No.		25	away. I don't recall how many	-
2.5 A. NO.		2.5	away. I don't recail now many	were arrested there
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1	Carl Higbie v Steven G James – 10-23-24 – Ca	arlton Higbie IV	1	Carl Higbie v Steven G James –	10-23-24 – Carlton Higbie IV
2	Q. And, Mr. Higbie, can I I		2	the chief of police takes your f	inger or the the
3	apologize for asking again but do you mind	fixing the	3	office of the chief of police tak	tes your
4	camera	-	4	fingerprints. They conduct an	interview, you have
5	A. Oh, sorry.		5	two letters of recommendation	which has been since
6	Q so that we're seeing you and		6	rescinded. You no longer need	d the letters of
7	not the phone receiver?		7	recommendation per Connecti	cut law. And then it
8	A. There you go. Sorry.		8	then they give you a temporary	y permit. Then you go
9	Q. Sure. Thank you. So how lon	ıg	9	to the state and present the ten	nporary permit to the
10	have you had the Connecticut license?	-	10	state. The state takes it and th	
11	A. So I just renewed. I would		11	this former formal	
12	imagine going on I believe I got it right whe	en I	12	Q. And is there an i	nterview portion
13	moved back to Connecticut which would ha		13	of that application?	
14	2012, 2013.		14	A. I don't recall. I b	elieve I did
15	Q. And if you hold on a second I		15	meet with the chief of police b	
16	will try to share the screen and see if we can	ทมไ	16	long ago I don't remember exa	
17	this off. Can everyone see that? Did that sh	*	17	Q. Was there a fee i	• • • • •
18	work?	uning .	18	with that?	
19	A. It did. That that is my old		19	A. Yes.	
20	permit. I have an updated one that I just ren	awad	20	Q. Do you recall ho	w much it was?
21	like two weeks ago.	icweu	20	A. I believe well,	
22	U		21	tell you my renewal fee I belie	
	Q. I see. I see that this one $10/7 - 524$		22		
23	expired 10/7 of '24.			dollars. So I'm assuming my o	ligiliai iee was
24	A. Right.		24	something like that.	· · ·
25	Q. So is that because the previous	5	25	Q. And what's invol	ived in renewing a
		Page 41			Page 43
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1 2	Carl Higbie v Steven G James – 10-23-24 – Ca one expired? And just for the record, this is	arlton Higbie IV the rect?	1 2	Carl Higbie v Steven G James – license?	10-23-24 – Carlton Higbie IV nd of got on the
1 2 3	Carl Higbie v Steven G James – 10-23-24 – Ca one expired? And just for the record, this is document marked Higbie zero zero one, cor	arlton Higbie IV the rect?	1 2 3	Carl Higbie v Steven G James – license? A. Actually they kin	10-23-24 – Carlton Higbie IV nd of got on the ubmitted a passport.
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1	Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV	1	Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV
2	off. Hang on one sec. This should actually solve	2	A. Proof of military active
3	it. I apologize.	3	military service.
4	Q. Thank you. Appreciate it. So I	4	Q. Nothing other than that?
5	guess the question is well, let me let's	5	A. No, nothing else.
6	let's start from do you view licensing as an	6	Q. Do you know what the requirements
7	infringement on that right?	7	are for a civilian to obtain that license?
8	A. A pistol or carried licensing,	8	A. I do not.
9		9	Q. So let's let's then move
	sir?		
10	Q. Well, your let me ask you. Do	10	toward just a broader question. Why are you suing
11	you view some kinds of licensing and not others as an	11	New York here?
12	infringement on that right?	12	A. Because I believe you guys are
13	A. Anything related to my right to	13	standing in my way of carrying a lawful firearm.
14	keep and bear arms. Any requirement for further	14	Q. When you say you guys who do you
15	licensing I believe it does infringe.	15	mean?
16	Q. So is there any sort of licensing	16	A. The State of New York and every
17	that you don't believe infringes on the right to bear	17	jurisdiction I've spoken to.
18	arms?	18	Q. In what ways is the State of New
19	A. Nothing related to the bearing	19	York standing in your way?
20	arms, no. I mean, a driver's license is not a	20	A. Everybody has told me that I
21	constitutionally protected item for driving a car,	21	can't apply, and the one time I went online to apply
22	but we're talking about gun rights. I believe I have	22	it was a bureaucratic mess that didn't allow me to
23	the right to walk in, buy a firearm, put it on my hip	23	proceed because it didn't I didn't have a New York
24	and walk out with no license, but that's not the	24	driver's license. I feel like every person and every
25	reality of the law and I'm a law abiding citizen.	25	entity is looking for a reason to blame somebody else
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1	Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV	1	Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV
2	not been the application.	2	Two?
3	Q. And when you said all people that	3	THE COURT REPORTER: Yes.
4	you spoke to that refers to Westchester County,	4	THE WITNESS: I'm just making my
5	Dutchess County, Putnam, Rensselaer and New York	5	window bigger because it's very small.
6	City, correct?	6	MR. THOMPSON: All right.
7	A. Did you say Dutchess as well,	7	THE WITNESS: You're good.
8	yes?	8	BY MR. THOMPSON: (Cont'g.)
9	Q. I did, yes.	9	Q. I'm scrolling down to page two
10	A. Okay.	10	your response to interrogatory number one.
11	Q. So I'm going to put on the screen	11	A. Okay.
12	a document if I can make the technology work. Give	12	Q. You mention here discussions with
13	me just a moment. And, sir, do you see this	13	the Port Chester police department, the Westchester
14	document?	14	County police department and Dutchess County. Is
15	A. Nothing yet.	15	that correct?
16		16	A. Correct.
	Q. Can anyone else see the document?		
17	MR. STAMBOULIEH: No. Also if in the	17	Q. So why did you not mention
18	next fifteen minutes I'd love to just take a bathroom	18	Putnam, Rensselaer and New York City?
19	break whenever you get to a good stopping point. No	19	A. I don't recall. I mean I did
20	no rush.	20	speak with them.
21	MR. THOMPSON: Why don't we do that	21	Q. And does your conversation with
22	now and I'll see if I can figure out how to make the	22	Putnam and New York City and Rensselaer County
23	screen show?	23	explain why you believe that New York refuses to
24	MR. STAMBOULIEH: All right.	24	allow you to carry a handgun?
25	MR. THOMPSON: Want to reconvene at	25	A. I don't really understand the
	Page 49		Page 51
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1	Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV	1	Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV
2	ten fifty or I think we lost him?	2	question.
3	MR. STAMBOULIEH: No, he said sure ten	3	Q. Sure. When you allege in the
4	fifty sounds good.	4	complaint that New York refuses to allow you to carry
5	MR. THOMPSON: All right.		complaint that i concrete sets to anow you to carry
		5	
6		5	a handgun, is part of the basis for that belief your
	(Off the record 10:47 a.m.)	6	a handgun, is part of the basis for that belief your conversation with the counties that you did not
7	(Off the record 10:47 a.m.) (On the record 10:56 a.m.)	6 7	a handgun, is part of the basis for that belief your conversation with the counties that you did not mention here?
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1 issociated Reporte	rs Int'l., Inc.	www.courtsteno.com	Associa	ted Reporters Int'l., Inc.	www.courtsteno.com
1 Carl Higbie	v Steven G James – 10	0-23-24 – Carlton Higbie IV	1	Carl Higbie v Steven G James – 1	0-23-24 – Carlton Higbie IV
2 believe th	nat you wouldn't be gra	nted one?	2	A. It's not.	
3	A. Just from the track	record of	3	Q. And what's the ba	asis of that
4 them not	letting me get one in th	he first place.	4	belief?	
5	Q. Let me ask the que	estion a	5	A. Florida is.	
6 different	way. Do you have any	reason to believe	6	Q. And why do you	believe that?
7 that you	lon't meet the legal req	uirements for one?	7	A. Statistics.	
8	A. I definitely meet th	he legal	8	Q. Which statistics?	
9 requirem	ents. They don't issue	permits to to	9	A. The ones from th	e crime center
10 people or	itside the state in my ex	xperience.	10	that were just released. I realiz	te that the
11	Q. And when you say	/ they?	11	democratic talking points are the	nat the State of New
12	A. All the police depa	artments and	12	York is safer but keep in mind	that the F.B.I. did
13 precincts	and officials that I've s	spoken to.	13	not get reporting from N.Y.P.D	. on recent crimes.
-	Q. So when you say r	-	14	That was just debunked and the	
	ean by that?		15	by almost six percent.	
-	A. I in my understa	unding the	16	Q. And I'm sorry, wi	hat are you
	eep and bear arms is th	-	17	referring to?	,
-	nized nationwide. It en	-	18	A. The F.B.I. crime	statistics.
-	Amendment doesn't, m		19	Q. And do you know	
	ve, Thirteen, Fourteen	-	20	crime statistics specifically?	
		e Second Amendment.	21	A. The ones that the	F B L released
	eve that my right to car		22	about a month ago.	T.D.I. Teleased
	it legally in one state, i	-	23	Q. All right. So wor	ıld it be in
	ted in all states.	it should be	24	your vision of reciprocity, wou	
24 Tecipioca 25		most to com	25	apply to his own state for licen	-
2.5	Q. So would it be cor	leet to say	2.5	apply to his own state for neen	sure?
		Page 53			Page 55
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1 Carl Higbie	v Steven G James – 10	0-23-24 – Carlton Higbie IV	1	Carl Higbie v Steven G James – 1	0-23-24 – Carlton Higbie IV
	i vou use the term rech		2	A. I believe that no	state should
3 this laws	n you use the term recip uit what you're asking f	· · ·	2		state should
	uit what you're asking f	for is for New York	3	require a permit.	
4 to take th	uit what you're asking f e Connecticut firearms	for is for New York (unintelligible)?	3 4	require a permit. Q. Let me ask the qu	uestion a
4 to take th 5	uit what you're asking f e Connecticut firearms A. That would be ide	for is for New York (unintelligible)? al. I believe	3 4 5	require a permit. Q. Let me ask the qu different way. If you were to p	lestion a revail in this case,
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4 to take th 5 6 ideal wor 7 8 different	uit what you're asking f e Connecticut firearms A. That would be ide ild be no permits at all	for is for New York (unintelligible)? al. I believe for anything. have	3 4 5 6 7 8	require a permit. Q. Let me ask the qu different way. If you were to p and one state were to be requir firearm permits issued by other person be able to apply to any	testion a revail in this case, ed to accept the states, would a state and get any
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1	Carl Higbie v Steven G James – 10	-23-24 – Carlton Higbie IV	1	Carl Higbie v Steven G James –	10-23-24 – Carlton Higbie IV
2	A. That would be a sta	art, yes.	2	The majority of America recog	nizes it as such.
3	Q. So let me ask you,	wouldn't then	3	Q. And so how does	that fit into the
4	people just apply to whatever sta	te has the lowest	4	reciprocity relief that you're se	eking in this case?
5	requirements in order to get a per	rmit there?	5	Would someone in a constituti	onal carry state be able
6	A. I don't know, you'd	have to ask	6	to carry in New York without o	ever getting a permit?
7	them.		7	A. I believe that wo	uld be nice,
8	Q. If you had the optic	on of carrying	8	yes.	
9	in New York with a New York S		9	Q. And is that part of	of the relief
10	permit that had lower requirement	-	10	that you're seeking in this case	
11	you choose to apply for?	,	11	A. In a perfect world	
12	A. I would apply for the	he well. I	12	relief resides in the my abilit	
13	have a Connecticut permit so we		13	firearm in New York. And ho	
14	hypothetical.	don't have to go	14	that in in compliance with B	
15	Q. And Connecticut h	as lower	15	law and the Constitution of the	
16	requirements that New York, cor		16	fine with as long as it's as long	
17	-		17	-	
	A. Less ridiculous req	uirements,		gun lawfully in the State of Ne	
18	yes, sir.	3.7 .1	18	through all your stupid hoops l	
19	Q. And let me ask you		19	Q. Why do you say	
20	term constitutional carry earlier.	What does that	20	A. The U.S. govern	-
21	mean?		21	twenty to thirty million dollars	-
22	A. The constitution gi		22	literally the best in the world a	
23	right to keep and bear, bear mear		23	firearm, and I was sent oversea	is to do things that
24	therefore, I believe the constitution	on allows me a	24	you couldn't imagine. And yet	I'm sitting here being
25	permit to carry a gun anywhere in	n the country.	25	deposed by you asking me why	I think I have a right
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1	Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV	1	Carl Higbie v Steven G James –	10-23-24 – Carlton Higbie IV
2	if you believe that licensing is unconstitutional and	2	haven't been able to so despite	all your laws you
3	you believe that NICS background checks are are	3	still have shootings with illega	l guns by criminals
4	unconstitutional, is there any mechanism that you	4	here in New York.	
5	believe is legitimate in order to make sure that	5	Q. I think there th	nose happen all
6	dangerous people don't have guns?	6	around the country.	
7	A. That's the point is I want to	7	A. And that's exactl	y my point.
8	protect myself and I know I'm not a dangerous person.	8	Thank you, sir, for making tha	t. That's why national
9	But actually all the criminals break your laws every	9	reciprocity is so important.	
10	day. So if you could guarantee me that criminals	10	Q. I'm not sure we u	inderstand each
11	wouldn't do crime we could have a different	11	other but let's move on.	
12	conversation. But since you can't do that I'm asking	12	A. (unintelligible) u	inderstand the
13	to be able to have the right to defend myself	13	constitution, sir.	
14	(unintelligible) that I need to.	14	Q. So why sir, I a	ppreciate.
15	Q. I understand. But, I'm, sir, I'd	15	This is a deposition. I underst	and that you come
16	like you ask (sic) the question presented which is if	16	from a different viewpoint that	n I do but I'd
17	you don't believe that licensing is constitutional	17	appreciate it if you could be at	least minimally
18	and you don't believe that background checks are	18	respectful.	
19	constitutional, do you believe that there's any	19	A. I'm being respectful.	
20	legitimate method to ensure that dangerous people	20	Q. Let me ask let	me ask you work
21	don't carry guns?	21	in New York City, you're spea	king from New York City
22	A. I would refer you to the	22	now, why aren't you suing New	w York City?
23	constitution whereas people have the right to keep	23	A. I was advised by	counsel to take
24	and bear arms.	24	this course.	
25	Q. Is that a no?	25	MR. STAMBOULI	EH: I'm going to object
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	Page 61			rage 05
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2	A. I am not.	2	MR. STAMBOULIEH: And I don't have any
3	Q. Did you originally contact them	3	questions either. Carl, you have an opportunity to
4	about the lawsuit or did they contact you?	4	read and sign your deposition and make sure that the
5	A. I don't recall actually.	5	court reporter accurately took down your responses to
6	Q. Did you ever have conversations	6	Mr. Thompson's questions. It's totally your right.
7	with a You Tube channel called Guns and Gadgets or	7	You could waive it if you don't want to read and
8	the people responsible for it?	8	sign. It reading and signing does not give you an
9	A. I honestly couldn't say.	9	opportunity to change your answers. Just to make
10	Q. Have you e-mailed anyone about	10	sure that the answers you give were accurately
	· · ·		
11	this lawsuit?	11	reflected in the in the transcript. Would you
12	MR. STAMBOULIEH: Going to object to	12	like to exercise that right?
13	the to the extent that	13	THE WITNESS: I would, yes.
14	MR. THOMPSON: I'll withdraw, Counsel.	14	MR. STAMBOULIEH: Okay. Thank you.
15	MR. STAMBOULIEH: Absolutely.	15	THE COURT REPORTER: So I'm sorry, the
16	MR. THOMPSON: Let me rephrase.	16	transcript will not be ready for like a couple weeks
17	BY MR. THOMPSON: (Cont'g.)	17	or I I think you can get it expedited if you need
18	Q. Other than counsel, have you e-	18	to do it quicker. You you're looking to sign it
19	mailed anyone about this lawsuit?	19	and and verify that it's correct?
20	A. Nothing specific comes to mind	20	MR. STAMBOULIEH: Yes, I believe so.
21	but it's possible, yeah.	21	THE COURT REPORTER: Okay. Yes, I
22	Q. Are you paying for your attorneys	22	will let them know. I mean, it's a digital it's a
23	in this lawsuit?	23	recording and then they transcribe it after so
		24	
24	A. I am not.		MR. STAMBOULIEH: Okay.
25	MR. STAMBOULIEH: If you just give me	25	THE COURT REPORTER: I will have
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1	Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV	2	Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV
2	a second real quick. I would just object to the		them contact your lawyer and then you can sign it.
3	whole who's paying the lawsuit stuff but you're	3	
4	free to ask your questions.		MR. STAMBOULIEH: Thank you.
1		4	THE WITNESS: Thank you.
5	BY MR. THOMPSON: (Cont'g.)	4 5	
5 6			THE WITNESS: Thank you.
	BY MR. THOMPSON: (Cont'g.)	5	THE WITNESS: Thank you. THE COURT REPORTER: You're welcome.
6	BY MR. THOMPSON: (Cont'g.) Q. I'm not inquiring into advice of	5 6	THE WITNESS: Thank you. THE COURT REPORTER: You're welcome. So are we through?
6 7	BY MR. THOMPSON: (Cont'g.) Q. I'm not inquiring into advice of counsel. So do you know who is paying for the	5 6 7	THE WITNESS: Thank you. THE COURT REPORTER: You're welcome. So are we through? MR. THOMPSON: I think so.
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Associa 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	tted Reporters Int'l., Inc. www.courtsteno.com Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV I, PAUL MCALOON, do hereby certify that the foregoing testimony of CARLTON HIGBIE IV was taken by me, in the cause, at the time and place, and in the presence of counsel, as stated in the caption hereto, at Page 1 hereof; that before giving testimony said witness was duly sworn to testify the truth, the whole truth and nothing but the truth; that the foregoing typewritten transcription, consisting of pages number 1 to 68, inclusive, is a true record prepared by me and completed by Associated Reporters Int'l., Inc. from materials provided by me. PAUL MCALOON, Reporter	
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