

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK CARL HIGBIE, JOSEPH HARRIS, and MICHAEL VOTRUBA, Plaintiffs, V Civil Action No.:24-CV-00174 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 County, New York, and JOHN DOES 1-10, Defendants.</p> <p style="text-align: center;">X</p> <p><b>DEPOSITION OF: CARLTON HIGBIE IV</b> <b>DATE:</b> October 23, 2024 <b>TIME:</b> 10:04 a.m. to 11:22 a.m. <b>VENUE:</b> Microsoft Teams</p> <p>Reported by Paul McAloon</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 INDEX OF PROCEEDINGS 3 CARLTON HIGBIE IV; Sworn 4 Direct Examination by Mr. Thompson 12 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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 <b>APPEARANCES:</b> 3 <b>FOR HIGBIE AND HARRIS:</b> 4 STAMBOULIEH LAW, PLLC 5 <b>BY:</b> STEPHEN STAMBOULIEH, ESQ. 6 P.O. Box 428 7 Olive Branch, Mississippi 38654 8 <b>FOR THE DEFENDANTS:</b> 9 OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL 10 <b>BY:</b> JAMES THOMPSON, A.A.G. 11 28 Liberty Street 12 New York, New York 10005 13 <b>FOR STEPHEN JAMES:</b> 14 OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL 15 <b>BY:</b> MATTHEW GALLAGHER, A.A.G. 16 The Capitol 17 Albany, New York 12224 18 <b>FOR DONALD KRAPF:</b> 19 COLUMBIA COUNTY 20 <b>BY:</b> ROBERT FITZSIMMONS, ESQ. 21 401 State Street 22 Hudson, New York 12534 23 <b>ALSO PRESENT:</b> 24 BECKY FOSTER, NOTARY PUBLIC 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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 EXHIBIT INDEX 3 Marked as 4 Described as 5 One 42 6 Higby 001 Mr. Higbie's license 7 Two 51 8 Higbie's responses to the interrogatories 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      Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</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 style="text-align: right;">Page 5</p> <p>800-523-7887                      ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc.                      www.courtsteno.com</p> <p>1      Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</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 style="text-align: right;">Page 7</p> <p>800-523-7887                      ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc.                      www.courtsteno.com</p> <p>1      Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</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 style="text-align: right;">Page 6</p> <p>800-523-7887                      ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc.                      www.courtsteno.com</p> <p>1      Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</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 style="text-align: right;">Page 8</p> <p>800-523-7887                      ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  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 style="text-align: right;">Page 9</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 very much. Before I depart, if I could just have the  3 attorneys' state and spell your name for the record?  4 Give us your firm name and address as well. We can  5 start with Mr. Stamboulieh.  6 <b>MR. STAMBOULIEH:</b> Sure. Stephen  7 Stamboulieh for the plaintiffs, Stamboulieh Law,  8 P.L.L.C., P.O. Box 428 Olive Branch, Mississippi  9 38654.  10 <b>THE NOTARY:</b> Thank you. Mr.  11 Fitzsimmons?  12 <b>MR. FITZSIMMONS:</b> Sure. Robert  13 Fitzsimmons, F-I-T-Z-S-I-M-M-O-N-S, Columbia County  14 Attorney, 401 State Street, Hudson, New York 12534.  15 <b>THE NOTARY:</b> Thank you. And Mr.  16 Gallagher.  17 <b>MR. GALLAGHER:</b> Matthew Gallagher on  18 behalf of Stephen James from the New York State  19 Office of the Attorney General, the Capitol, Albany,  20 New York 12224.  21 <b>THE NOTARY:</b> Thank you. And Mr.  22 Thompson.  23 <b>MR. THOMPSON:</b> Sure, thanks. James  24 Thompson, T-H-O-M-P-S-O-N also from the Office of the  25 Attorney General on behalf of Superintendent James,</p> <p style="text-align: right;">Page 11</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 (The deposition commenced at 10:04  3 a.m.)  4 <b>THE NOTARY:</b> I will just put on the  5 record that even though I was with you gentlemen last  6 weekend, or last week, I apologize, that I'm  7 representing (unintelligible) and I'm going to swear  8 the witness in for you today. And then Paul will be  9 your reporter. He's just waiting on his notary at  10 this point. Mr. Higbie, could I please have you  11 raise your right hand? Do you swear or affirm that  12 the testimony you're about to give in this cause will  13 be the truth, the whole truth and nothing but the  14 truth?  15 <b>MR. HIGBIE:</b> I do.  16 <b>CARLTON HIGBIE, IV; Sworn</b>  17 <b>THE NOTARY:</b> Would you please state  18 and spell your name for the record?  19 <b>THE WITNESS:</b> Carlton M. Higbie, IV,  20 C-A-R-L-T-O-N, M, H-I-G-B-I-E and then IV.  21 <b>THE NOTARY:</b> Okay. And could you  22 please give our reporter your address?  23 <b>THE WITNESS:</b> 70 North Old Stone  24 Bridge Road, Cos Cob, Connecticut 06807.  25 <b>THE NOTARY:</b> All right. Thank you</p> <p style="text-align: right;">Page 10</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 28 Liberty Street, New York, New York 10005.  3 <b>THE NOTARY:</b> Okay. Thank you. Your  4 witness has been sworn and, gentlemen, have a good  5 day.  6 <b>MR. THOMPSON:</b> Thank you.  7 <b>THE NOTARY:</b> Thank you, good bye.  8 <b>DIRECT EXAMINATION</b>  9 <b>BY MR. THOMPSON:</b>  10 Q. Mr. Higbie, thank you for taking  11 the time to chat with us this morning. We appreciate  12 it.  13 A. Thank you.  14 Q. So my name is James Thompson.  15 I'm an assistant attorney general here at O.A.G. and  16 I represent the Superintendent James in this lawsuit.  17 So during the deposition I'm going to ask you a  18 number of questions and there are a handful of things  19 to remember for the aid of the court reporter. First  20 off, please wait until the end of every question  21 before beginning your answer. One of the best ways  22 to make sure that we have a -- a clear transcript is  23 to make sure that we're not talking at the same time.  24 And if at any point I ask you a question that you  25 don't understand, please ask me to clarify it. If</p> <p style="text-align: right;">Page 12</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 you give me an answer I'll assume that you understood 3 the question. 4 A. Okay. 5 Q. Great. Please make sure all your 6 answers are verbal. In, you know, regular 7 conversation we say things like uh-huh and huh-uh or 8 shrug our shoulders or shake our head. None of that 9 necessarily comes through on the court reporter's 10 transcript so make sure you're saying yes or no or -- 11 or otherwise verbally responding to the question. 12 From time to time your attorney may 13 make an objection. Unless your attorney instructs 14 you not to answer, based on a claim of privilege, you 15 should -- you should still answer the question that I 16 asked. And, lastly, if you need to take a break at 17 any time just ask me and we'll take one. I'll ask 18 you to finish responding to the question or to the 19 line of questioning presented but happy to stop off 20 and take a break at any time you want. Hopefully, we 21 won't be here that long. But, you know, should you 22 need to take five don't hesitate to let us know. 23 Does that all make sense? 24 A. Yes. 25 Q. Great. So, Mr. Higbie, what's</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 A. Today, yes. 3 Q. Have you ever been deposed 4 before? 5 A. Yes. 6 Q. When? 7 A. Ballpark in the last five years 8 twice. Once for a -- a civil suit with my neighbor 9 and then recently -- well, that was the recent one. 10 Maybe five years before that during a divorce 11 proceeding. 12 Q. And any time before that? 13 A. Not -- not that I can recall. 14 Q. And the civil dispute with the 15 neighbor, what's the name of that case? 16 A. That would be Higbie versus 17 Aurora. We actually just won that ruling, so it's 18 been concluded. 19 Q. And what -- what court would that 20 be in? 21 A. Stamford Superior. 22 Q. Okay. And the divorce 23 proceeding, what -- what court was that in? 24 A. Also Stamford. 25 Q. So do you understand that you're</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 your date of birth? 3 A. 04/23/1983. 4 Q. And where do you live? 5 A. Currently Greenwich, Connecticut. 6 Q. Do you have any other residences? 7 A. I do. 8 Q. And where are those residences? 9 A. Colebrook, Connecticut. 10 Q. Do you own any other property? 11 A. No. 12 Q. And what do you do for work? 13 A. T.V. host. 14 Q. And that's -- is that for 15 Newsmax? 16 A. Correct. 17 Q. And where do you work? 18 A. Physically? 19 Q. Yes. 20 A. Those studios are in Manhattan. 21 Q. And is that -- is that Manhattan 22 that I see behind you today? 23 A. Correct. 24 Q. And so you're -- you're here in 25 New York City right now?</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 under oath today? 3 A. I do. 4 Q. Are you suffering from any 5 illness or taking any medication that could affect 6 your ability to answer questions fully? 7 A. No. 8 Q. Is there any other reason why you 9 might not be able to give complete and truthful 10 answers to the questions that you're asked today? 11 A. Not to my knowledge. 12 Q. Great. So are you represented by 13 counsel today? 14 A. I am. 15 Q. And is that Mr. Stamboulieh? 16 A. It is. 17 Q. What did you do to prepare for 18 today's deposition? 19 A. Generally just review the notes 20 that I sent to you guys in my original, whatever that 21 document is, the statement of fact, things like that. 22 Q. Can you be more specific about 23 the document you're referring to? 24 A. I -- whatever the -- the 25 interrogatories that you guys had sent over.</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 Q. And do you have a set of notes 3 independent of that? 4 A. No. 5 Q. Okay. Other than your 6 interrogatories, have you reviewed any documents in - 7 - in preparation for today's deposition? 8 A. None other than the ones that we 9 had submitted to you. 10 Q. So is that any documents -- I'm 11 trying to understand if there's any documents in 12 addition to those interrogatories. 13 A. Not to my knowledge. 14 Q. Okay. Did you meet with Mr. 15 Stamboulieh to prepare for today's deposition? 16 <b>MR. STAMBOULIEH:</b> I'm going to object. 17 I'm going to object just to the extent that he's 18 asking for anything that we spoke about, otherwise 19 you can answer the question. 20 A. I did speak with him yesterday. 21 <b>BY MR. THOMPSON:</b> (Cont'g.) 22 Q. For about how long? 23 <b>MR. STAMBOULIEH:</b> Come on. I'm going 24 to object to that. You don't need to know how long 25 we spoke.</p> <p>Page 17 800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 A. No. 3 Q. Could we request a copy of the 4 video? 5 A. You'd have to pay for a Newsmax 6 subscription but, yes, you could get it there. 7 Well, you can fill out a document 8 request in the course of -- in the course of -- of 9 this litigation if we need to. If -- something that 10 you want to produce voluntarily. 11 Q. Mr. Higbie, we seem to have lost 12 your -- your picture on the web connection. I'm -- 13 I'm getting what looks to be a film receiver. 14 A. It keeps connecting to my -- it 15 keeps connecting to the phone that's over here, so if 16 it does that I'll just keep pushing disconnect. 17 Q. Gotcha. Thank you. That's, you 18 know, a brave new world of virtual depositions. So 19 other than your attorney and on your show have you 20 discussed this deposition with anyone? 21 A. Just my wife. 22 Q. And other than your attorney and 23 on your show have you discussed this case with 24 anyone? 25 A. Yes.</p> <p>Page 19 800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 <b>MR. THOMPSON:</b> It's -- I mean, I'm not 3 asking about the content. 4 <b>MR. STAMBOULIEH:</b> I understand. I 5 still instruct you not to answer about anything about 6 our conversation. 7 <b>BY MR. THOMPSON:</b> (Cont'g.) 8 Q. All right. Other than your 9 attorney, have you discussed today's deposition with 10 anyone else? 11 A. I did mention it actually 12 yesterday but not to discussion with it. 13 Q. And who did you mention it to? 14 A. In front of five hundred thousand 15 people on my show. 16 Q. Oh, so you mentioned on air that 17 you were going to have the deposition? 18 A. Correct. 19 Q. Are your shows transcribed? 20 A. I don't know. 21 Q. What did you say about the 22 deposition? 23 A. That I was being deposed by the 24 State of New York tomorrow regarding my gun case. 25 Q. Anything beyond that?</p> <p>Page 18 800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 Q. Who? 3 A. Couldn't recall. Quite a few 4 people. 5 Q. Can you recall some of them? 6 A. No. 7 Q. You can't recall the name of a 8 single person that you discussed this case with? 9 A. Well, I can disclose the fact 10 that I took the safe -- the New York Safety Course 11 with Tom White and I discussed it with him. But I 12 discussed it with quite a few other people that I 13 just couldn't name specifically at this time. 14 Q. And who is Tom White? 15 A. Tom White is the New York 16 certified state pistol and safety instruction for the 17 new unconstitutional requirements of New York. 18 Q. And is he affiliated with any 19 organization? 20 A. Well, he is an N.R.A. safety 21 instructor for basic -- I think every state takes it 22 and then also through the State of New York. 23 Q. But he doesn't -- he isn't -- 24 doesn't work for or employed or isn't employed by any 25 specific organization? He's just independent, is</p> <p>Page 20 800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 that correct? 3 A. I couldn't answer that. I don't 4 know. 5 Q. How did you choose Mr. White to 6 take the safety course with? 7 A. He came recommended through my 8 gun club. 9 Q. Which gun club is that? 10 A. It is Campfire Club of America. 11 Q. And is that club based in New 12 York or Connecticut? 13 A. Hold on. Let me disconnect you 14 again. You know what, I'm just going to point my 15 phone at me in case the next time that happens, so. 16 Sorry, could you repeat the question? 17 Q. Sure. Where is -- where is that 18 gun club based? 19 A. Chappaqua, New York. 20 Q. And other than Mr. White who else 21 have you discussed this case with? 22 A. Asked and answered. 23 Q. Sir, you're the deponent. I 24 don't think that's an objection that you get to 25 raise. You said you spoke with many people. You</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 options, to get a right endowed by my creator that I 3 went and fought for overseas. 4 Q. And so when you say you've mat -- 5 asked in multiple jurisdictions, which jurisdictions 6 are you referring to? 7 A. Dutchess County, Rensselaer 8 County, Putnam County, Westchester County, and in 9 Manhattan. 10 Q. So why don't we -- actually, 11 before we -- before we discuss those, have you ever 12 actually submitted a application for a firearms 13 permit at any of these locations? 14 A. I attempted to online a while 15 back but it didn't allow me to proceed because I 16 didn't have a New York State driver's license. 17 Q. And with which jurisdiction was 18 this? 19 A. I believe it was Westchester 20 County. 21 Q. And did you ever try to submit an 22 application either online or in person with any other 23 New York State jurisdiction? 24 A. I inquired in police stations in 25 all the counties I mentioned. And all of them turned</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 named Mr. White. Is there anyone else that you can 3 name that you spoke with about -- with about this 4 case? 5 A. I couldn't name specifics. I've 6 discussed it with a number of people in passing. 7 Q. So what -- when you spoke with 8 Mr. White about the case, what was the conversation? 9 A. Generally that in order to get my 10 constitutional rights back I've had to go through a 11 number of legal loopholes including filing suit 12 against the State of New York. Hang on one sec. I 13 don't know why it keeps doing this. 14 Q. That's fine. 15 A. All right. Hopefully, that turns 16 it off now. If not I'm just going to point this at 17 me. Sorry about that. 18 Q. Sure. When you say legal 19 loopholes, what do you mean by that? 20 A. New York exactly hasn't made it 21 easy. I was a Navy Seal for nine years and I'm a 22 pretty confident shooting guy. And I've asked in 23 multiple jurisdictions in order to get my permit and 24 I've been turned away at every single one. So it's - 25 - I've been left no option to, other than legal</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 me away on the spot, said don't even bother because 3 you don't live here, you don't work here, you don't 4 come through here and you're not a New York State 5 resident. 6 Q. So let's -- let's discuss each of 7 these if you don't mind. So -- and let me make sure 8 that I have the list correctly. You listed Dutchess 9 County, Westchester County, Putnam County, Rensselaer 10 County and New York City, is that right? 11 A. Correct. 12 Q. So which did you speak with 13 first? 14 A. Honestly this has been close to 15 seven or eight years running now so I couldn't recall 16 which one I spoke with first. 17 Q. So let's -- let's just ask about 18 them one at a time. Do you have a sense of when you 19 spoke with Dutchess County? 20 A. That would have been around 2016. 21 Q. And why did you choose Dutchess 22 County to speak with? 23 A. I frequent that area. I have 24 friends that have property there and I would like to 25 hunt or shoot there. They have a very nice range.</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 Instead of shooting their guns I'd like to bring my 3 own but it's not lawful for me to bring pistols into 4 the state. So I inquired at a local police station 5 somewhere up in the -- in the Wingdale area where 6 their property is and they told me to don't even 7 bother. 8 Q. Do you recall who it was that you 9 spoke to? 10 A. No. 11 Q. And do you call -- do you recall 12 precisely what they said? 13 A. Just that I didn't live there, I 14 didn't own property there, I'm not a resident of New 15 York. It's -- don't even bother. 16 Q. And this was in 2016 you said, is 17 that correct? 18 A. Around 2016. 19 Q. So let me ask about Putnam 20 County. When did you speak with them? 21 A. It would have been shortly after 22 that. Hang on this -- I don't know what is going on 23 here. 24 Q. So also around 2016 and 2017? 25 A. Correct. It would have been in</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 to at Rensselaer County? 3 A. No, it would have been whoever 4 was at the front desk of the police precinct. 5 Q. And do you recall what precisely 6 you were told? 7 A. Similar to what I was told 8 everywhere else. 9 Q. How about Westchester County. 10 When did you speak with them? 11 A. Westchester County was more 12 recent. After the Bruen decision came down, the 13 Supreme Court Bruen decision, I walked into port -- 14 the Port Chester police station which is the closest 15 police precinct to where I live which is right over 16 the line from Greenwich. And I wanted to apply for a 17 permit based on the Bruen decision. And I was 18 literally laughed out of the police station and told 19 that they -- they won't be honoring anything because 20 they have no rules changes and they don't know what 21 to do. 22 Q. And when you say the Port Chester 23 police station, do you know what law enforcement is 24 that? Is that a -- a local police, is that county 25 police?</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 that time frame. 3 Q. And what's your recollection of 4 that conversation? 5 A. Exactly the same that I had -- 6 same content that I had with Dutchess County which 7 was you -- you don't live here, you don't work here, 8 there's -- you're not a New York State resident. 9 Apply somewhere else or don't apply. 10 Q. And let's ask about Rensselaer 11 County. When did you speak with Rensselaer County? 12 A. It would have been around the 13 same time. 14 Q. So 2016 or 2017? 15 A. It may even extend to 2018. I -- 16 I just can't recall the exact dates. 17 Q. Why did you speak to Rensselaer 18 County? 19 A. They were an adjacent county to 20 Dutchess. 21 Q. And do you have any connection to 22 Rensselaer County? 23 A. Other than I occasionally drive 24 through it. 25 Q. And do you remember who you spoke</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 A. That would be a local police. 3 Local to the town or city. 4 Q. And do you recall who you spoke 5 with? 6 A. No. 7 Q. And do you know does the Port 8 Chester police department issue firearm permits? 9 A. We didn't even get that far so I 10 don't know. I would assume. That's how I do it in 11 Greenwich. So when I got my Greenwich permit or my 12 Connecticut permit it starts at the local police 13 precinct. 14 Q. Did you ever speak with the 15 Westchester County police department? 16 A. I did inquire there as well. I 17 couldn't recall what date but it would have been 18 around the same time as the Bruen decision. 19 Q. So around 2022? 20 A. Correct. 21 Q. Do you remember who you spoke 22 with and what they said? 23 A. It was a similar conversation to 24 what Port Chester said which is they don't have any 25 rules updates or anything and that I wouldn't -- that</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 wouldn't be the place I'd apply. 3 Q. Did you ever -- and you -- you 4 said you spoke with New York City police department, 5 is that correct? 6 A. Correct. 7 Q. When was this? 8 A. This is post Bruen as well. 9 Q. So around 2022? 10 A. On or around, yeah. 11 Q. Do you recall who you spoke with? 12 A. No. 13 Q. And what did you -- what -- what 14 did you tell them and what did they tell you? 15 A. I asked the same question. I'd 16 like to get a pistol permit, how do I go about it 17 because I can't proceed online because I don't have a 18 New York State driver's license and they just 19 shrugged their shoulders and said you don't apply 20 here. We don't know what to tell you. That's -- 21 that's above our pay grade. 22 Q. Did you tell them that you worked 23 in New York City? 24 A. I did. 25 Q. And what did they -- how did they</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 to proceed until I have that and I don't have that. 3 Q. Have you ever spoken with the New 4 York State police about firearms licensing? 5 A. No. I -- let me rephrase that. 6 I do believe I called them post Bruen to ask and I 7 was met with we don't even have a rules update for it 8 yet. 9 Q. And do you recall who you spoke 10 to? 11 A. No. 12 Q. Do you recall anything more about 13 the conversation? 14 A. No. 15 Q. Do you know if the New York State 16 police has any role in deciding firearms license 17 applications? 18 A. Apparently nobody has any role 19 so, no, I don't know who is in charge. 20 Q. And are you a retired member of 21 the Division of State Police? 22 A. No. 23 Q. Other than the ones that we 24 mentioned, have you spoken with any other New York 25 counties or New York law enforcement institutions</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 respond to that? 3 A. Doesn't matter. 4 Q. You know, I -- I will -- would it 5 surprise you to know that many people who work in New 6 York City but don't live in New York City have 7 firearms permits issued by the N.Y.P.D.? 8 A. That wouldn't surprise me but I 9 don't know anybody in New York City so. Sorry it 10 keeps connecting with my phone. But I don't -- I -- 11 I don't know any specific people that have gotten one 12 that don't live here. I know a lot of people who 13 applied or tried to apply but have the same 14 (unintelligible) as me. 15 Q. But you did not actually apply to 16 the -- the N.Y.P.D., is that correct? 17 A. There was no mechanism for me to 18 apply. 19 Q. I mean you can fill out an 20 application and hand it to them. 21 A. No, you can't. 22 Q. Can you explain? 23 A. I was told I can't do that. I 24 was told I have to apply online which requires a New 25 York State driver's license which does not allow me</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 about firearms licensing? 3 A. Not off the top of my head, no. 4 Q. So do you know if any of the 5 other counties in New York would accept an 6 application from you? 7 A. I don't know. 8 Q. Have you spoken with any -- with 9 any county or any other law enforcement institution 10 that issues permits in 2023 or 2024? 11 A. Not to my knowledge, no. 12 Q. Do you know if New York City 13 allows for non-residence to apply for a license 14 currently? 15 A. I understand that they have 16 changed the rules. I had not yet reapplied or 17 applied at all. I have completed the safety course 18 required by New York State but I have not applied yet 19 because I've been getting all my ducks and bills in a 20 -- in a row. 21 Q. Do you intend to apply? 22 A. I do. 23 Q. When? 24 A. As soon as I get time to do it. 25 Q. So if you apply for a New York</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 City license and got one, wouldn't that essentially 3 give you everything you want from this case? 4 A. It would, but my understanding is 5 that this is sometimes as long as a two year process. 6 Q. Do you know how long it will 7 take? 8 A. I've been instructed by my pistol 9 permit instructor, who's been going through this 10 before, he says sometimes it's as long as eighteen 11 months to get in front of a judge and six months to 12 get a fingerprinting appointment. 13 Q. And I apologize, this gentleman's 14 name has slipped my mind, Tom, what was his name? 15 A. Tom White. 16 Q. Tom White. And is he a 17 representative of New York City? 18 A. No, he just teaches the safety 19 course that you guys require. 20 Q. Okay. So I got to ask you a 21 number of questions. I apologize if some of them are 22 a little personal. They're variations on a -- on a 23 theme as you'll -- as you'll see. Sir, are you over 24 twenty-one? 25 A. Yes.</p> <p>Page 33 800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 illness? 3 A. No. 4 Q. Have you ever been committed or 5 spent time in a mental health institution? 6 A. No. 7 Q. Have you ever had any 8 professional license suspended or revoked? 9 A. No. 10 Q. Have you ever had a driver's 11 license revoked? 12 A. No. 13 Q. You testified that you served in 14 the military, correct? 15 A. Yes. 16 Q. Was your discharge honorable? 17 A. Yes. 18 Q. Have you ever had a guardian 19 appointed for you to manage your affairs? 20 A. I'm sorry, you -- you cut out a 21 little bit there. Say that one more time. 22 Q. My apologies. Have you ever had 23 a garden -- guardian appointed for you to manage your 24 affairs? 25 A. No.</p> <p>Page 35 800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 Q. Are you a United States citizen? 3 A. Yes. 4 Q. Have you ever renounced your 5 citizenship? 6 A. No. 7 Q. Have you ever been convicted 8 anywhere of a felony or serious offense? 9 A. No. 10 Q. Have you ever been convicted of 11 anything including a misdemeanor or violation? 12 A. No. 13 Q. Have you ever had a warrant out 14 for your arrest? 15 A. Not to my knowledge. 16 Q. Have you ever been investigated 17 by law enforcement? 18 A. Not to my knowledge. 19 Q. Are you a fugitive from justice? 20 A. No. 21 Q. Do you use any illegal drugs? 22 A. No. 23 Q. Not even pot? 24 A. No. 25 Q. Have you ever suffered any mental</p> <p>Page 34 800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 Q. Have you ever been convicted of 3 assault? 4 A. No. 5 Q. Have you ever had a D.U.I? 6 A. No. 7 Q. Would you be able and willing to 8 submit all the information required in a New York 9 State firearms permit application? 10 A. Yes. 11 Q. Including the name of your spouse 12 and any adults residing in your home? 13 A. Yes. 14 Q. Do you have four character 15 references? 16 A. Yes. 17 Q. Who would they be? 18 A. May I access the folder? It's 19 sitting here on my desk. 20 Q. Sure. 21 A. All right. So I have Joe Benoit 22 would be one, Adele Catino would be another, Lincoln 23 Power is another, David West is another and then -- 24 well, I got five just in case, and then Graham 25 Fatadad (phonetic spelling) is the fifth.</p> <p>Page 36 800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</p> <p>2 Q. And so the folder that you're</p> <p>3 looking at right now, what is that folder?</p> <p>4 A. It's a folder of the letters of</p> <p>5 recommendation.</p> <p>6 Q. For a firearms permit</p> <p>7 application?</p> <p>8 A. Correct.</p> <p>9 Q. Other than the letters of</p> <p>10 recommendation is there anything in the folder?</p> <p>11 A. No. Just -- well, I take it back. Just my</p> <p>12 pistol safety certification course.</p> <p>13 Q. So is there any -- would you</p> <p>14 provide a photograph and fingerprints in connection</p> <p>15 with your application?</p> <p>16 A. Yes.</p> <p>17 Q. Is there any reason to think that</p> <p>18 a background check in New York or any other state</p> <p>19 would flag anything that might lead to the denial of</p> <p>20 a license?</p> <p>21 A. No.</p> <p>22 Q. And is there any reason to think</p> <p>23 that you would use a weapon in a way that would</p> <p>24 endanger yourself or others?</p> <p>25 A. No.</p> <p style="text-align: right;">Page 37</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</p> <p>2 upstairs well after midnight. My, at the time my</p> <p>3 wife, who is now currently my ex-wife, woke me up</p> <p>4 because she heard people on the back -- our back</p> <p>5 porch which was in an association.</p> <p>6 I looked out the window and I saw them</p> <p>7 trying to get into our backdoor. I instructed her to</p> <p>8 call the authorities and I went downstairs to make</p> <p>9 sure that if they did come in they wouldn't be able</p> <p>10 to get upstairs to -- at the my wife at the time and</p> <p>11 the three children and their parents also staying in</p> <p>12 our house at which point they came in and I engaged I</p> <p>13 believe the fourth intruder. And it became a</p> <p>14 physical altercation.</p> <p>15 I did not fire a shot but I did have</p> <p>16 my pistol in my hand and I was able to subdue all the</p> <p>17 -- the people without, you know, using any type of</p> <p>18 lethal force.</p> <p>19 Q. And when you say subdue what does</p> <p>20 that mean and -- and what happened after?</p> <p>21 A. Subdue would mean temporarily</p> <p>22 incapacitate by restraint or, you know, physical</p> <p>23 force. Put them on the ground, the cops arrived and</p> <p>24 proceeded to arrest the ones that had not gotten</p> <p>25 away. I don't recall how many were arrested there</p> <p style="text-align: right;">Page 39</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</p> <p>2 Q. Other than in your service in the</p> <p>3 military, have you been present for any incident in</p> <p>4 which someone was shot or otherwise hurt with a</p> <p>5 weapon?</p> <p>6 A. No. You said or injured or just</p> <p>7 shot?</p> <p>8 Q. Shot or otherwise hurt.</p> <p>9 A. Yes, I have.</p> <p>10 Q. And what incident was this?</p> <p>11 A. I had six kids (unintelligible)</p> <p>12 of kids. Six people break into my house in Virginia</p> <p>13 Beach at which point I went downstairs with a firearm</p> <p>14 just in case and did not fire a shot. However, I did</p> <p>15 engage in hand to hand combat with them so I, you</p> <p>16 know, pistol was present but I did not fire a shot.</p> <p>17 I used proper trigger discipline in case I didn't</p> <p>18 want to escalate it.</p> <p>19 Q. And when was this?</p> <p>20 A. This would have been 2007.</p> <p>21 Q. And can you tell me a little bit</p> <p>22 more about that incident? How it resolved itself?</p> <p>23 A. Yes, so 2007 I had come back from</p> <p>24 a deployment in Baghdad actually and we had just</p> <p>25 gotten home a few weeks prior. I was sleeping</p> <p style="text-align: right;">Page 38</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</p> <p>2 but two were I believe arrested down the street</p> <p>3 because they got into a car accident fleeing. And</p> <p>4 then I was, you know, giving my statement. Was</p> <p>5 allowed to go back to bed.</p> <p>6 Q. And do you know were those people</p> <p>7 ultimately convicted or punished?</p> <p>8 A. I remember going to court for the</p> <p>9 initial hearing for them as a witness but beyond that</p> <p>10 I -- I don't recall. I didn't follow the case.</p> <p>11 Q. Do you recall the names of the</p> <p>12 cases or the court that it was in?</p> <p>13 A. It would have been Virginia Beach</p> <p>14 Circuit Court. But other than that I don't recall</p> <p>15 the names of the case.</p> <p>16 Q. And you had mentioned earlier</p> <p>17 that you don't own any property outside of</p> <p>18 Connecticut. So do you no longer own the Virginia</p> <p>19 Beach property?</p> <p>20 A. Correct.</p> <p>21 Q. So, sir, do you currently hold</p> <p>22 any firearm or concealed weapons permits?</p> <p>23 A. I do.</p> <p>24 Q. And from what state?</p> <p>25 A. Connecticut.</p> <p style="text-align: right;">Page 40</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 Q. And, Mr. Higbie, can I -- I  3 apologize for asking again but do you mind fixing the  4 camera --  5 A. Oh, sorry.  6 Q. -- so that we're seeing you and  7 not the phone receiver?  8 A. There you go. Sorry.  9 Q. Sure. Thank you. So how long  10 have you had the Connecticut license?  11 A. So I just renewed. I would  12 imagine going on I believe I got it right when I  13 moved back to Connecticut which would have been 20 --  14 2012, 2013.  15 Q. And if you hold on a second I  16 will try to share the screen and see if we can pull  17 this off. Can everyone see that? Did that sharing  18 work?  19 A. It did. That -- that is my old  20 permit. I have an updated one that I just renewed  21 like two weeks ago.  22 Q. I see. I see that this one  23 expired 10/7 of '24.  24 A. Right.  25 Q. So is that because the previous</p> <p style="text-align: right;">Page 41</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 the chief of police takes your finger or the -- the  3 office of the chief of police takes your  4 fingerprints. They conduct an interview, you have  5 two letters of recommendation which has been since  6 rescinded. You no longer need the letters of  7 recommendation per Connecticut law. And then it --  8 then they give you a temporary permit. Then you go  9 to the state and present the temporary permit to the  10 state. The state takes it and they issue you a --  11 this former -- formal --.  12 Q. And is there an interview portion  13 of that application?  14 A. I don't recall. I believe I did  15 meet with the chief of police but I also -- it was so  16 long ago I don't remember exactly what happened.  17 Q. Was there a fee in connection  18 with that?  19 A. Yes.  20 Q. Do you recall how much it was?  21 A. I believe -- well, I could just  22 tell you my renewal fee I believe was seventy  23 dollars. So I'm assuming my original fee was  24 something like that.  25 Q. And what's involved in renewing a</p> <p style="text-align: right;">Page 43</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 one expired? And just for the record, this is the  3 document marked Higbie zero zero one, correct?  4 A. Are you asking -- (overspeaking)?  5 Q. Yeah, I'm asking you, yes.  6 A. I don't know what the number of  7 the document is.  8 Q. Do you -- do you see here at the  9 bottom where I'm highlighting Higbie zero zero one?  10 A. Oh, yes, I do.  11 Q. And this is your former license  12 that just expired, correct?  13 A. Correct. The only difference in  14 the new one is the date.  15 <b>MR. THOMPSON:</b> And, Mr. Court  16 Reporter, I'd ask that this be marked as Exhibit One.  17 <b>THE COURT REPORTER:</b> Okay. I will do.  18 <b>BY MR. THOMPSON:</b> (Cont'g.)  19 Q. So can you recall what were the  20 application requirements to get a license in  21 Connecticut?  22 A. It was the N.R.A. safety course  23 which I believe -- don't -- I'm not exactly sure but  24 I believe it's fourteen hours. It's a two-day course  25 and then an application to your town at which point</p> <p style="text-align: right;">Page 42</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 license?  3 A. Actually they kind of got on the  4 horse there. I went online, I submitted a passport.  5 My license which I -- I submitted online and then I  6 paid the fee online with a credit card and then a new  7 -- an updated head shot and they sent me a new  8 renewal in the mail.  9 Q. Okay. And do you think that this  10 licensing process is unconstitutional?  11 A. Yes.  12 Q. Why?  13 A. Well, because the Second  14 Amendment says the right to keep and bear arms.  15 Bearing arms is constitutionally protected. There  16 mentions nothing about a permit. Also Article One  17 Section Fifteen of the Connecticut constitution gives  18 you the right to keep and bear arms as well, so I  19 believe the permitting process in its entirety is  20 unconstitutional and a bureaucratic mess.  21 Q. And, Mr. Higbie, I -- I  22 apologize. We appear to have lost your -- your  23 video.  24 A. I'm sorry about this. I have no  25 idea why it keep -- I'm just going to turn my phone</p> <p style="text-align: right;">Page 44</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 off. Hang on one sec. This should actually solve  3 it. I apologize.  4 Q. Thank you. Appreciate it. So I  5 guess the question is -- well, let me -- let's --  6 let's start from -- do you view licensing as an  7 infringement on that right?  8 A. A pistol or carried licensing,  9 sir?  10 Q. Well, your -- let me ask you. Do  11 you view some kinds of licensing and not others as an  12 infringement on that right?  13 A. Anything related to my right to  14 keep and bear arms. Any requirement for further  15 licensing I believe it does infringe.  16 Q. So is there any sort of licensing  17 that you don't believe infringes on the right to bear  18 arms?  19 A. Nothing related to the bearing  20 arms, no. I mean, a driver's license is not a  21 constitutionally protected item for driving a car,  22 but we're talking about gun rights. I believe I have  23 the right to walk in, buy a firearm, put it on my hip  24 and walk out with no license, but that's not the  25 reality of the law and I'm a law abiding citizen.</p> <p>Page 45</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 A. Proof of military -- active  3 military service.  4 Q. Nothing other than that?  5 A. No, nothing else.  6 Q. Do you know what the requirements  7 are for a civilian to obtain that license?  8 A. I do not.  9 Q. So let's -- let's then move  10 toward just a broader question. Why are you suing  11 New York here?  12 A. Because I believe you guys are  13 standing in my way of carrying a lawful firearm.  14 Q. When you say you guys who do you  15 mean?  16 A. The State of New York and every  17 jurisdiction I've spoken to.  18 Q. In what ways is the State of New  19 York standing in your way?  20 A. Everybody has told me that I  21 can't apply, and the one time I went online to apply  22 it was a bureaucratic mess that didn't allow me to  23 proceed because it didn't -- I didn't have a New York  24 driver's license. I feel like every person and every  25 entity is looking for a reason to blame somebody else</p> <p>Page 47</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 Q. So why aren't you suing about  3 that?  4 A. It's crossed my mind but I'm not  5 a lawyer so I was advised on the best course of  6 action to carry my firearm.  7 Q. Do you hold a firearms license  8 from any state other than Connecticut?  9 A. I used to have a Virginia permit.  10 Q. And when was that?  11 A. When I lived there.  12 Q. And do you recall when that was?  13 A. I believe -- well, I moved out of  14 there in 2012 so -- and I just let it expire because  15 I didn't frequent the area, and also they went to  16 constitutional carry, how -- how it should be.  17 Q. And so when did it expire?  18 A. I couldn't recall. Sometime  19 within a few years of me leaving.  20 Q. And approximately when was it  21 originally issued?  22 A. 2005 I believe when I was first  23 stationed there.  24 Q. And what were the requirements to  25 obtain that license?</p> <p>Page 46</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 and not allow me the right to carry a firearm when  3 I'm -- all I'm doing is trying to seek a lawful  4 mechanism to abide by the laws that you guys have  5 passed. And you guys as in the State of New York and  6 any representatives of.  7 Q. So do you understand New York law  8 to require someone to be a New York resident or have  9 New York State employment?  10 A. I understand that everywhere I  11 have inquired has not accepted any type of, or I  12 shouldn't say accepted, not allowed -- not help me  13 one bit, not given me any advice. Everybody has  14 turned me away and pointed to somewhere else or  15 something else. And nobody has helped me do this.  16 There's no lawful mechanism for me to walk in and  17 apply for a permit that I know of.  18 Q. Would it surprise you to know  19 that New York law specifically allows for a license  20 to be issued to, quote, a noncitizen or to a person  21 not a citizen of and usually a resident in the state?  22 A. That is not its application and  23 practice with me.  24 Q. Does that term describe you?  25 A. It would describe me but that's</p> <p>Page 48</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 not been the application. 3 Q. And when you said all people that 4 you spoke to that refers to Westchester County, 5 Dutchess County, Putnam, Rensselaer and New York 6 City, correct? 7 A. Did you say Dutchess as well, 8 yes? 9 Q. I did, yes. 10 A. Okay. 11 Q. So I'm going to put on the screen 12 a document if I can make the technology work. Give 13 me just a moment. And, sir, do you see this 14 document? 15 A. Nothing yet. 16 Q. Can anyone else see the document? 17 <b>MR. STAMBOULIEH:</b> No. Also if in the 18 next fifteen minutes I'd love to just take a bathroom 19 break whenever you get to a good stopping point. No 20 -- no rush. 21 <b>MR. THOMPSON:</b> Why don't we do that 22 now and I'll see if I can figure out how to make the 23 screen show? 24 <b>MR. STAMBOULIEH:</b> All right. 25 <b>MR. THOMPSON:</b> Want to reconvene at</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 Two? 3 <b>THE COURT REPORTER:</b> Yes. 4 <b>THE WITNESS:</b> I'm just making my 5 window bigger because it's very small. 6 <b>MR. THOMPSON:</b> All right. 7 <b>THE WITNESS:</b> You're good. 8 <b>BY MR. THOMPSON:</b> (Cont'g.) 9 Q. I'm scrolling down to page two 10 your response to interrogatory number one. 11 A. Okay. 12 Q. You mention here discussions with 13 the Port Chester police department, the Westchester 14 County police department and Dutchess County. Is 15 that correct? 16 A. Correct. 17 Q. So why did you not mention 18 Putnam, Rensselaer and New York City? 19 A. I don't recall. I mean I did 20 speak with them. 21 Q. And does your conversation with 22 Putnam and New York City and Rensselaer County 23 explain why you believe that New York refuses to 24 allow you to carry a handgun? 25 A. I don't really understand the</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 ten fifty or I think we lost him? 3 <b>MR. STAMBOULIEH:</b> No, he said sure ten 4 fifty sounds good. 5 <b>MR. THOMPSON:</b> All right. 6 (Off the record 10:47 a.m.) 7 (On the record 10:56 a.m.) 8 <b>BY MR. THOMPSON:</b> (Cont'g.) 9 Q. So let me see if I can share a 10 document here for you. And let me know if you can 11 see this. 12 A. Yes. 13 Q. Great. Sir, do you recognize 14 this document? 15 A. Yes. 16 Q. And what is it? 17 A. It appears to be my responses. 18 Q. And let me know if you need to 19 see more of it. 20 A. No, I don't. 21 Q. Great. And so this is your 22 responses to the interrogatories in this case? 23 A. It appears to be yes. 24 <b>MR. THOMPSON:</b> Great. Mr. Court 25 Reporter, can I ask you to mark it as Exhibit Number</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV 2 question. 3 Q. Sure. When you allege in the 4 complaint that New York refuses to allow you to carry 5 a handgun, is part of the basis for that belief your 6 conversation with the counties that you did not 7 mention here? 8 A. Yes, it was a similar response 9 from basically every single person I spoke to. 10 Q. All right. So is part of what 11 you're trying to achieve in this lawsuit reciprocity? 12 A. That would be ideal because it 13 would make me not have to go through the bureaucratic 14 process and pay more fees to exercise a lawful 15 constitutional right. But I'd be happy to go through 16 the lawful process in New York if there was a 17 mechanism for it. 18 Q. And so does that mean that if -- 19 if you were able to apply for a -- a New York City 20 firearms permit or New York State firearms permit you 21 would have all the relief that you're seeking in this 22 case? 23 A. Not if I was able to apply. If I 24 was granted one immediately. 25 Q. But do you have any reason to</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 believe that you wouldn't be granted one?  3 A. Just from the track record of  4 them not letting me get one in the first place.  5 Q. Let me ask the question a  6 different way. Do you have any reason to believe  7 that you don't meet the legal requirements for one?  8 A. I definitely meet the legal  9 requirements. They don't issue permits to -- to  10 people outside the state in my experience.  11 Q. And when you say they?  12 A. All the police departments and  13 precincts and officials that I've spoken to.  14 Q. So when you say reciprocity what  15 do you mean by that?  16 A. I -- in my understanding the  17 right to keep and bear arms is the only one that is  18 not recognized nationwide. It ends at state lines.  19 My First Amendment doesn't, my Third, Fourth Fifth,  20 the Twelve, Thirteen, Fourteen none of those apply to  21 anything just in the state only the Second Amendment.  22 So I believe that my right to carry a firearm, if I  23 can carry it legally in one state, it should be  24 reciprocated in all states.  25 Q. So would it be correct to say</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 A. It's not.  3 Q. And what's the basis of that  4 belief?  5 A. Florida is.  6 Q. And why do you believe that?  7 A. Statistics.  8 Q. Which statistics?  9 A. The ones from the crime center  10 that were just released. I realize that the  11 democratic talking points are that the State of New  12 York is safer but keep in mind that the F.B.I. did  13 not get reporting from N.Y.P.D. on recent crimes.  14 That was just debunked and they had to revise them up  15 by almost six percent.  16 Q. And I'm sorry, what are you  17 referring to?  18 A. The F.B.I. crime statistics.  19 Q. And do you know what -- which  20 crime statistics specifically?  21 A. The ones that the F.B.I. released  22 about a month ago.  23 Q. All right. So would it be, in  24 your vision of reciprocity, would a person need to  25 apply to his own state for licensure?</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 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 that when you use the term reciprocity in terms of  3 this lawsuit what you're asking for is for New York  4 to take the Connecticut firearms (unintelligible)?  5 A. That would be ideal. I believe  6 ideal would be no permits at all for anything.  7 Q. So different states have  8 different requirements to obtain a firearms permit,  9 correct?  10 A. Correct.  11 Q. And would it be correct to say  12 that New York has higher standards than most states?  13 A. More ridiculous standards not  14 higher.  15 Q. Can you explain to me what you  16 mean by that?  17 A. It is the most stringent yet has  18 much higher gun crime than New Hampshire, Vermont,  19 Maine, which all have constitutional carry. So I  20 call it ridiculous requirements.  21 Q. Would it surprise you to know  22 that New York is the safest (unintelligible) state in  23 the nation in terms of firearm death rates?  24 A. It is not.  25 Q. It's not?</p> <p style="text-align: right;">Page 54</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 A. I believe that no state should  3 require a permit.  4 Q. Let me ask the question a  5 different way. If you were to prevail in this case,  6 and one state were to be required to accept the  7 firearm permits issued by other states, would a  8 person be able to apply to any state and get any  9 state's permit? So, for instance, would someone be  10 able to apply to Virginia even if they didn't live in  11 Virginia and then carry in New York?  12 A. I'm not totally clear on your  13 question, sir.  14 Q. Sure. Let me ask it in a  15 different way. Do you believe that if you prevail in  16 this case New York would be required to take any  17 states' permit even if the person carrying was not a  18 resident of the state in which he obtained that  19 permit?  20 A. So let me ask back so I can be  21 clear on what you're asking. So you're asking me if  22 I believe that if I win every state permit should be  23 valid in every other state, specifically New York in  24 this case.  25 Q. Yes, let's start there.</p> <p style="text-align: right;">Page 56</p> <p>800-523-7887 ARII@courtsteno.com</p>



<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</p> <p>2 A. That would be a start, yes.</p> <p>3 Q. So let me ask you, wouldn't then</p> <p>4 people just apply to whatever state has the lowest</p> <p>5 requirements in order to get a permit there?</p> <p>6 A. I don't know, you'd have to ask</p> <p>7 them.</p> <p>8 Q. If you had the option of carrying</p> <p>9 in New York with a New York State permit or a state</p> <p>10 permit that had lower requirements, which one would</p> <p>11 you choose to apply for?</p> <p>12 A. I would apply for the -- well, I</p> <p>13 have a Connecticut permit so we don't have to go</p> <p>14 hypothetical.</p> <p>15 Q. And Connecticut has lower</p> <p>16 requirements that New York, correct?</p> <p>17 A. Less ridiculous requirements,</p> <p>18 yes, sir.</p> <p>19 Q. And let me ask you. You use the</p> <p>20 term constitutional carry earlier. What does that</p> <p>21 mean?</p> <p>22 A. The constitution gives us the</p> <p>23 right to keep and bear, bear means just carry so,</p> <p>24 therefore, I believe the constitution allows me a</p> <p>25 permit to carry a gun anywhere in the country.</p> <p>Page 57</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</p> <p>2 The majority of America recognizes it as such.</p> <p>3 Q. And so how does that fit into the</p> <p>4 reciprocity relief that you're seeking in this case?</p> <p>5 Would someone in a constitutional carry state be able</p> <p>6 to carry in New York without ever getting a permit?</p> <p>7 A. I believe that would be nice,</p> <p>8 yes.</p> <p>9 Q. And is that part of the relief</p> <p>10 that you're seeking in this case?</p> <p>11 A. In a perfect world. It's -- my</p> <p>12 relief resides in the -- my ability to carry a</p> <p>13 firearm in New York. And however you guys want to do</p> <p>14 that in -- in compliance with Bruen and the New York</p> <p>15 law and the Constitution of the United States I'm</p> <p>16 fine with as long as it's -- as long as I can carry a</p> <p>17 gun lawfully in the State of New York without jumping</p> <p>18 through all your stupid hoops I'm in.</p> <p>19 Q. Why do you say stupid hoops?</p> <p>20 A. The U.S. government spent about</p> <p>21 twenty to thirty million dollars training me to be</p> <p>22 literally the best in the world at carrying a</p> <p>23 firearm, and I was sent overseas to do things that</p> <p>24 you couldn't imagine. And yet I'm sitting here being</p> <p>25 deposed by you asking me why I think I have a right</p> <p>Page 59</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</p> <p>2 Q. Can you explain to me -- when you</p> <p>3 say allows me to carry a permit anywhere in the</p> <p>4 country, what do you mean by that?</p> <p>5 A. Oh, well, I didn't say it allows</p> <p>6 me to carry a permit. I said allows me to carry a</p> <p>7 firearm.</p> <p>8 Q. Sure. Let me take a step back.</p> <p>9 You mentioned earlier that Virginia, for instance,</p> <p>10 went constitutional carry. What did you mean by</p> <p>11 that?</p> <p>12 A. So I can carry a firearm in the</p> <p>13 State of Virginia without a Virginia carry permit.</p> <p>14 Q. Do you need any carry permits to</p> <p>15 carry in Virginia?</p> <p>16 A. They do issue carry permits. I'm</p> <p>17 not up to date on the most recent laws, but at the</p> <p>18 time I left you were constitutionally allowed to buy</p> <p>19 a gun, walk out, put it on your hip on the same day.</p> <p>20 Q. So would it be correct to say</p> <p>21 that the phrase constitutional carry is generally</p> <p>22 understood to mean being able to buy a gun and carry</p> <p>23 it without having to obtain any sort of permit or</p> <p>24 license?</p> <p>25 A. Correct. Twenty-seven states.</p> <p>Page 58</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</p> <p>2 to carry a gun in the State of New York where I</p> <p>3 frequent all the time. Does that sound ridiculous to</p> <p>4 you?</p> <p>5 Q. Do you think that it's legitimate</p> <p>6 for the people of the State of New York to want to</p> <p>7 make sure that the people carrying weapons in this</p> <p>8 state are responsible and not dangerous?</p> <p>9 A. Well, there are gun laws in place</p> <p>10 that say you can't purchase guns already that are</p> <p>11 very stringent in New York. So if you can purchase a</p> <p>12 gun why shouldn't you be able to carry a gun?</p> <p>13 Q. So let me ask you are you</p> <p>14 referring to NICS background check there?</p> <p>15 A. Yes.</p> <p>16 Q. Do you believe that's</p> <p>17 constitutional?</p> <p>18 A. No.</p> <p>19 Q. Why not?</p> <p>20 A. Because, again, keep and bear</p> <p>21 arms shall not be infringed. That would be an</p> <p>22 infringement of my rights, I believe. I'm an</p> <p>23 absolutist of the constitution as well as the First</p> <p>24 Amendment.</p> <p>25 Q. So what I'm trying to get at is</p> <p>Page 60</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 if you believe that licensing is unconstitutional and  3 you believe that NICS background checks are -- are  4 unconstitutional, is there any mechanism that you  5 believe is legitimate in order to make sure that  6 dangerous people don't have guns?  7 A. That's the point is I want to  8 protect myself and I know I'm not a dangerous person.  9 But actually all the criminals break your laws every  10 day. So if you could guarantee me that criminals  11 wouldn't do crime we could have a different  12 conversation. But since you can't do that I'm asking  13 to be able to have the right to defend myself  14 (unintelligible) that I need to.  15 Q. I understand. But, I'm, sir, I'd  16 like you ask (sic) the question presented which is if  17 you don't believe that licensing is constitutional  18 and you don't believe that background checks are  19 constitutional, do you believe that there's any  20 legitimate method to ensure that dangerous people  21 don't carry guns?  22 A. I would refer you to the  23 constitution whereas people have the right to keep  24 and bear arms.  25 Q. Is that a no?</p> <p style="text-align: right;">Page 61</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 haven't been able to so despite all your laws you  3 still have shootings with illegal guns by criminals  4 here in New York.  5 Q. I think there -- those happen all  6 around the country.  7 A. And that's exactly my point.  8 Thank you, sir, for making that. That's why national  9 reciprocity is so important.  10 Q. I'm not sure we understand each  11 other but let's move on.  12 A. (unintelligible) understand the  13 constitution, sir.  14 Q. So why -- sir, I appreciate.  15 This is a deposition. I understand that you come  16 from a different viewpoint than I do but I'd  17 appreciate it if you could be at least minimally  18 respectful.  19 A. I'm being respectful.  20 Q. Let me ask -- let me ask you work  21 in New York City, you're speaking from New York City  22 now, why aren't you suing New York City?  23 A. I was advised by counsel to take  24 this course.  25 <b>MR. STAMBOULIEH:</b> I'm going to object</p> <p style="text-align: right;">Page 63</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 A. I mean, I'm not clear, I -- I  3 don't really understand the premise of your question  4 whereas you're asking me to litigate whether or not  5 dangerous people can carry guns and that's not my  6 prerogative. My prerogative is to keep myself and my  7 family and my friends safe.  8 Q. No, I'm asking for your  9 interpretation of the constitution and whether there  10 is any legitimate law that you believe would be  11 constitutional that has as the same (unintelligible)  12 keeping dangerous people from carrying guns?  13 A. I believe that the constitution  14 gives you the right to keep and bear. That's all.  15 There are laws in place now that if you are a  16 criminal that you can't get a gun and I believe that  17 is probably fine if you've committed murder then you  18 shouldn't own a gun. But guess what? People who do  19 already do own guns. So since you guys can't keep  20 that safe that's why I want to carry a gun.  21 Q. So how are we supposed to keep  22 people from -- who have committed murder from buying  23 a gun without a background check or without  24 licensing?  25 A. Well, that's my point. Is you</p> <p style="text-align: right;">Page 62</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV  2 to any advice that you've been given and don't --  3 don't talk about things that we've talked about.  4 <b>BY MR. THOMPSON:</b> (Cont'g.)  5 Q. But you would view New York City  6 as the place where you're employed, correct?  7 A. Currently, yes.  8 Q. And New York City could issue you  9 a permit?  10 A. I have yet to see them with the  11 ability because the last time I tried they said no.  12 Q. And this was in 2022?  13 A. Yes, post Bruen.  14 Q. And so let me ask just a couple  15 more questions. Are you a member of the Gun Owners  16 of America?  17 A. I am.  18 Q. When did you join?  19 A. Approximately three years ago.  20 Q. And why did you join?  21 A. I found out about them, I saw  22 their mission and thought they were doing good  23 things.  24 Q. What about the Second Amendment  25 Foundation, are you a member of that?</p> <p style="text-align: right;">Page 64</p> <p>800-523-7887 ARII@courtsteno.com</p>

<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</p> <p>2 A. I am not.</p> <p>3 Q. Did you originally contact them</p> <p>4 about the lawsuit or did they contact you?</p> <p>5 A. I don't recall actually.</p> <p>6 Q. Did you ever have conversations</p> <p>7 with a You Tube channel called Guns and Gadgets or</p> <p>8 the people responsible for it?</p> <p>9 A. I honestly couldn't say.</p> <p>10 Q. Have you e-mailed anyone about</p> <p>11 this lawsuit?</p> <p>12 <b>MR. STAMBOULIEH:</b> Going to object to</p> <p>13 the -- to the extent that --.</p> <p>14 <b>MR. THOMPSON:</b> I'll withdraw, Counsel.</p> <p>15 <b>MR. STAMBOULIEH:</b> Absolutely.</p> <p>16 <b>MR. THOMPSON:</b> Let me rephrase.</p> <p>17 <b>BY MR. THOMPSON:</b> (Cont'g.)</p> <p>18 Q. Other than counsel, have you e-</p> <p>19 mailed anyone about this lawsuit?</p> <p>20 A. Nothing specific comes to mind</p> <p>21 but it's possible, yeah.</p> <p>22 Q. Are you paying for your attorneys</p> <p>23 in this lawsuit?</p> <p>24 A. I am not.</p> <p>25 <b>MR. STAMBOULIEH:</b> If you just give me</p> <p style="text-align: right;">Page 65</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</p> <p>2 <b>MR. STAMBOULIEH:</b> And I don't have any</p> <p>3 questions either. Carl, you have an opportunity to</p> <p>4 read and sign your deposition and make sure that the</p> <p>5 court reporter accurately took down your responses to</p> <p>6 Mr. Thompson's questions. It's totally your right.</p> <p>7 You could waive it if you don't want to read and</p> <p>8 sign. It -- reading and signing does not give you an</p> <p>9 opportunity to change your answers. Just to make</p> <p>10 sure that the answers you give were accurately</p> <p>11 reflected in the -- in the transcript. Would you</p> <p>12 like to exercise that right?</p> <p>13 <b>THE WITNESS:</b> I would, yes.</p> <p>14 <b>MR. STAMBOULIEH:</b> Okay. Thank you.</p> <p>15 <b>THE COURT REPORTER:</b> So I'm sorry, the</p> <p>16 transcript will not be ready for like a couple weeks</p> <p>17 or I -- I think you can get it expedited if you need</p> <p>18 to do it quicker. You -- you're looking to sign it</p> <p>19 and -- and verify that it's correct?</p> <p>20 <b>MR. STAMBOULIEH:</b> Yes, I believe so.</p> <p>21 <b>THE COURT REPORTER:</b> Okay. Yes, I</p> <p>22 will let them know. I mean, it's a digital -- it's a</p> <p>23 recording and then they transcribe it after so --</p> <p>24 <b>MR. STAMBOULIEH:</b> Okay.</p> <p>25 <b>THE COURT REPORTER:</b> -- I will have</p> <p style="text-align: right;">Page 67</p> <p>800-523-7887 ARII@courtsteno.com</p>
<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</p> <p>2 a second real quick. I would just object to the</p> <p>3 whole -- who's paying the lawsuit stuff but you're</p> <p>4 free to ask your questions.</p> <p>5 <b>BY MR. THOMPSON:</b> (Cont'g.)</p> <p>6 Q. I'm not inquiring into advice of</p> <p>7 counsel. So do you know who is paying for the</p> <p>8 lawsuit?</p> <p>9 A. I do not.</p> <p>10 Q. Do you have any idea where the</p> <p>11 funding comes from?</p> <p>12 A. No.</p> <p>13 Q. All right. Let's take a quick</p> <p>14 five minute break. Actually, let's just make it</p> <p>15 seven minutes. Come back at eleven twenty</p> <p>16 <b>MR. THOMPSON:</b> Eleven twenty. Does</p> <p>17 that work everyone?</p> <p>18 <b>MR. STAMBOULIEH:</b> Yes.</p> <p>19 (Off the record 11:14 a.m.)</p> <p>20 (On the record 11:20 a.m.)</p> <p>21 <b>MR. THOMPSON:</b> All right. Thank you.</p> <p>22 Nothing further from the superintendent. So, Rob,</p> <p>23 any questions you may have.</p> <p>24 <b>MR. FITZSIMMONS:</b> I don't have any</p> <p>25 questions at this time. Thank you.</p> <p style="text-align: right;">Page 66</p> <p>800-523-7887 ARII@courtsteno.com</p>	<p>Associated Reporters Int'l., Inc. www.courtsteno.com</p> <p>1 Carl Higbie v Steven G James – 10-23-24 – Carlton Higbie IV</p> <p>2 them contact your lawyer and then you can sign it.</p> <p>3 <b>MR. STAMBOULIEH:</b> Thank you.</p> <p>4 <b>THE WITNESS:</b> Thank you.</p> <p>5 <b>THE COURT REPORTER:</b> You're welcome.</p> <p>6 So are we through?</p> <p>7 <b>MR. THOMPSON:</b> I think so.</p> <p>8 (The deposition concluded at 11:22</p> <p>9 a.m.)</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 68</p> <p>800-523-7887 ARII@courtsteno.com</p>

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