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IN THE COURT OF COMMON PLEAS  
LUCAS COUNTY, OHIO

COMMON PLEAS COURT  
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Case No. G-4801-CI-0202202926

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Estate of Allison Roebke,

Plaintiff,

vs.

ADCO Firearms, et al.,

Defendants.

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Videotaped

Deposition of: STEVEN E. THOMPSON

Date and Time: Friday, August 4, 2023  
1:06 p.m.

Place: Teleconference via Zoom

Stenographic

Reporter: Maria DiPaolo Jones, RDR, CRR  
Notary Public - State of Ohio

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1 REMOTE APPEARANCES:

2 On behalf of Plaintiff:

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4 chelseaw@cooperelliott.com  
5 Cooper Elliott, LLC  
6 305 West Nationwide Boulevard  
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9 On behalf of Defendants ADCO Firearms, LLC and Steven  
10 E. Thompson:

11 ROBERT J. BAHRET, ESQ.  
12 rbahret@rcmtz.com  
13 Rohrbachers Cron Manahan Trimble  
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18 On behalf of Defendant Steven E. Thompson:

19 D. LEE JOHNSON, ESQ.  
20 lee@leejohnsonlegal.com  
21 Johnson & Associates  
22 2927 North McCord Road, Suite 100  
23 Toledo, Ohio 43614  
24 419.455.1245

25 ALSO PRESENT:

Gil Whitney, videographer

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1 Friday Afternoon Session  
2 August 4, 2023.

3 --|--

4 THE VIDEOGRAPHER: The following  
5 deposition of Steven E. Thompson is being taken on  
6 August 4th, 2023, with all attorneys appearing  
7 remotely, in the matter of the Estate of Allison  
8 Roebke versus ADCO Firearms, et al., pending in the  
9 Court of Common Pleas, Lucas County, Ohio, Case  
10 number G-4801-CI-0202202926.

11 The court reporter is Maria Jones, and the  
12 videographer is Gil Whitney with Integrity Reporting  
13 Group.

14 We're on the record at 1:06. Would  
15 counsel please announce their presence and stipulate  
16 to the remote administration of the oath and video  
17 recording of this deposition.

18 MS. WEAVER: Chelsea Weaver on behalf of  
19 Plaintiff, the Estate of Allison Roebke, and I so  
20 stipulate.

21 MR. BAHRET: Bob Bahret on behalf of both  
22 defendants, and I so stipulate.

23 MR. JOHNSON: Attorney Lee Johnson for  
24 Steven E. Thompson, stipulate.

25 THE VIDEOGRAPHER: Thank you. The

1 reporter may now swear the witness.

2 THE STENOGRAPHER: Mr. Johnson, could you  
3 please raise your right hand.

4 --|--

5 STEVEN E. THOMPSON,  
6 being by me first duly sworn, as hereinafter  
7 certified, deposes and says as follows:

8 CROSS-EXAMINATION

9 BY MS. WEAVER:

10 Q. Good afternoon, Mr. Thompson. My name is  
11 Chelsea Weaver, as I said when we were being  
12 introduced, I represent the plaintiff, the Estate of  
13 Allison Roebke in this case.

14 Can you please state your full name for  
15 the record?

16 A. Steven Edward Thompson.

17 Q. Would you prefer that I call you  
18 "Mr. Thompson"? "Steve"? "Steven"?

19 A. I'm good with "Steve."

20 Q. Steve? Okay.

21 A. Yes.

22 Q. That's my dad's name, so it will be easy  
23 to remember.

24 All right. Have you ever testified in a  
25 deposition before?

1 A. No.

2 Q. Have you ever testified at trial?

3 A. No.

4 Q. Other than this matter have you ever been  
5 a party to a lawsuit?

6 A. No.

7 Q. Okay. I know that you were present at  
8 some of the depositions in this case already, so I  
9 won't take too much time going over the ground rules,  
10 but I'd like to go over just a few guidelines.

11 So my priority here today is to make sure  
12 that you understand the question that I'm being --  
13 that I'm asking you. If you don't understand what  
14 I'm asking you, you can ask me to rephrase or repeat  
15 my question as often as you'd like. Fair?

16 A. Fair.

17 Q. You might hear your counsel object during  
18 the deposition. What I want you to do is to let me  
19 know if you don't understand the question, regardless  
20 of whether they do or not, and answer even if they're  
21 objecting unless they tell you not to answer. Is  
22 that fair?

23 A. Fair.

24 Q. Okay. And since we are creating a  
25 transcript along with the video, you've been doing a

1 good job so far, but verbal responses rather than  
2 head shakes, head nods, uh-huhs, things like that.

3 Sound good?

4 A. Sounds good.

5 Q. Okay. And I don't think that this will be  
6 a terribly long deposition, but if you do want to  
7 take a break, I usually take a break after about an  
8 hour or so anyways, but if you want to take a break  
9 sooner than that, just let me know and we will do  
10 that. Okay?

11 A. I will.

12 Q. Okay. And can we agree for the record  
13 that you are under oath today?

14 A. I am.

15 Q. Okay. And you understand that that means  
16 that you must answer truthfully and fully unless one  
17 of your counsel advises you not to answer at all?

18 A. I do.

19 Q. Okay. And that means that you must answer  
20 just as if you were in the courtroom in front of a  
21 jury, correct?

22 A. Correct.

23 Q. Okay. Is there any reason that you can't  
24 answer my questions today truthfully or completely?

25 A. No.

1 Q. You're not under any sort of medication or  
2 substances that would affect your ability to answer  
3 truthfully?

4 A. No.

5 Q. Okay. Let's start with some easy ones.  
6 What is your address?

7 A. 5814 Thornberry, Monclova, Ohio 43542.

8 Q. And what is your professional address?

9 A. 6481 Monroe Street, Sylvania, Ohio 43560.

10 Q. And for your Thornberry address, did you  
11 live there in February -- or, did you live there for  
12 the last several years?

13 A. Yes.

14 Q. How long have you lived there?

15 A. Since 2009.

16 Q. Okay. What's your date of birth?

17 A. 10/31/1971.

18 Q. Are you married?

19 A. I am.

20 Q. What's your spouse's name?

21 A. Barb.

22 Q. Thompson?

23 A. Correct.

24 Q. Any previous marriages?

25 A. No.

1 Q. Do you have any kids?

2 A. No.

3 Q. All right. Talk to me about what you did,  
4 if anything, to prepare for today's deposition.

5 A. I watched a couple YouTube videos about  
6 depositions.

7 Q. Kind of like tips and how to get through?

8 A. Yes.

9 Q. Were they related specifically to the  
10 firearms industry?

11 A. No.

12 Q. Did you review any documents in  
13 preparation for today?

14 A. No.

15 Q. Did you, other than counsel, did you  
16 communicate with anyone about today's deposition?

17 A. Yes.

18 Q. Who?

19 A. Everyone I could tell.

20 Q. Everyone you could tell?

21 A. Correct.

22 Q. Okay. So this might, then, take a bit. I  
23 mean, can you start with who you told in person and  
24 kind of work your way out from there? Customers, I'm  
25 assuming?



1 A. Family. Friends.

2 Q. Okay.

3 A. Customers.

4 Q. Did you tell them all the same thing, or  
5 different things? Something general you told them  
6 about this deposition?

7 A. I told them my deposition is today at one  
8 o'clock.

9 Q. Anything else?

10 A. No.

11 Q. Of those people that you've spoken with  
12 about today's deposition, have you talked with them  
13 or others about this lawsuit generally?

14 A. Yes.

15 Q. Okay. What have you said to others about  
16 this lawsuit?

17 A. That it is nothing more than an immoral  
18 cash grab.

19 Q. And why do you think that?

20 A. Allison and Jerry conspired to commit a  
21 felony, they committed a felony, Jerry was convicted  
22 for that felony, and today the plaintiffs are looking  
23 to profit off their deceased daughter's criminal  
24 activity.

25 Q. Why do you believe that the plaintiffs are

1 intending to profit off of their daughter's deceased  
2 activity [verbatim]?

3 A. I don't understand the question.

4 Q. Well, you said that you believed that this  
5 is just a ploy to get a profit, I don't want to put  
6 words in your mouth, but something like that,  
7 correct?

8 A. Yes. They are doing it for money.

9 Q. Any other reasons that you think that this  
10 is just, to use your words, a cash grab?

11 A. No.

12 Q. Do you agree that federally licensed  
13 firearms dealers have an obligation to do their best  
14 to make sure that guns don't end up in the wrong  
15 hands?

16 A. I do.

17 Q. Have you sent any sort of text message or  
18 email communications, anything like that, about this  
19 lawsuit?

20 A. Yes.

21 Q. Okay. Other than ones with your counsel,  
22 can you please provide them to your counsel?

23 UNIDENTIFIED SPEAKER: Seems like there  
24 are text messages outside of us. Do you mean if  
25 there were -- the texts between you and me, we've

1 sent. Other than that, there's nothing else,  
2 correct?

3 He's got a few with the insurance carrier  
4 that we -- that we will not produce.

5 MS. WEAVER: I'm talking about --

6 THE STENOGRAPHER: Excuse me a minute.

7 MR. JOHNSON: Hey, Chelsea --

8 THE STENOGRAPHER: I need --

9 MR. JOHNSON: I'm sorry.

10 THE STENOGRAPHER: I need --

11 MR. JOHNSON: Chelsea, this is Lee  
12 Johnson. I just --

13 MS. WEAVER: Maria -- Hang on. Maria  
14 needs to say something.

15 THE STENOGRAPHER: I need you, gentleman,  
16 please to say who is speaking because I cannot see  
17 who is speaking.

18 MR. JOHNSON: All right. I'll go first.  
19 Attorney Lee Johnson speaking.

20 I need to clarify. The question was very  
21 general. Steve has texted between his attorneys  
22 personally, that's me, and Attorney Bahret with the  
23 insurance company. We don't believe that there's any  
24 others, and I'm going to let Attorney Bahret make an  
25 objection then, hopefully, Chelsea can clarify the

1 question.

2 MR. BAHRET: Yeah, this is Bob Bahret, and  
3 I object on the basis of anything that Steve sent to  
4 the insurance company is also protected by work  
5 product and privilege, and anything he sent me is  
6 also protected by privilege, and so those will not be  
7 produced.

8 Q. (By Ms. Weaver) Steve, do you have text  
9 messages or communications with folks other than  
10 insurance carrier or insurance defense counsel or  
11 your personal counsel regarding this lawsuit?

12 A. No.

13 Q. Okay. No other sort of communications  
14 that you could print out and give to your lawyer.  
15 True?

16 A. True.

17 Q. All right. What's your educational  
18 background?

19 A. I have a bachelor's of liberal studies  
20 from Bowling Green State University.

21 Q. All right. When did you graduate from BG?

22 A. 1996.

23 Q. And it was liberal arts, was there any  
24 area of focus?

25 A. American history.

1 Q. Okay. Let's start with ADCO and work our  
2 way back in terms of employment history. How long  
3 have you owned ADCO?

4 A. Since 2002.

5 Q. Okay. Have there ever been any other  
6 owners of ADCO?

7 A. Yes.

8 Q. Who?

9 A. Charles Adkins.

10 Q. Did he open ADCO?

11 A. Yes.

12 Q. What year, if you know?

13 A. I do not know.

14 Q. Okay. About how long before you became  
15 owner?

16 A. Five, maybe six years.

17 Q. Okay. Did you purchase it from him, or  
18 did you become a co-owner?

19 A. I purchased it.

20 Q. Did you work at ADCO before you purchased  
21 it?

22 A. I didn't work for the year before I worked  
23 at ADCO -- before I bought ADCO. For a year I spent  
24 three or four days a week helping the owner, hanging  
25 out, but no, I didn't officially work there.

1 Q. So that was for the year before. You're  
2 saying you spent time in the store, helped him out,  
3 and then you bought it from him in '02?

4 A. Correct.

5 Q. Okay. And where -- Were you working  
6 elsewhere when you were spending three to four days  
7 at ADCO before you bought it?

8 A. No.

9 Q. So from 2000 or so backwards, where did  
10 you work after you got your degree in '96?

11 A. I worked in information technology.

12 Q. Okay. Why did you decide to buy ADCO?

13 A. The previous owner of ADCO was a retired  
14 Sylvania police officer, and running ADCO for him was  
15 a full-time job for a retired gentleman and he  
16 complained about it every day. One day I jokingly  
17 said, "Sell me the business and retire."

18 Q. And that's what happened.

19 A. That's what happened.

20 Q. Okay. Any other employment? I'm not  
21 talking high school jobs, but since college.

22 A. Prior to ADCO was an internet start-up  
23 called Centromine; before that was an IT firm called  
24 Information Engineering; before that was National  
25 Family Opinion.

1 Q. Okay.

2 Have there ever been any other owners  
3 since you purchased it, of ADCO?

4 A. No.

5 Q. In July of 2020, how many employees did  
6 you have?

7 A. Myself and one other.

8 Q. Okay. Who is the one other?

9 A. David O'Malley.

10 Q. Does David O'Malley still work there?

11 A. He does.

12 Q. When did you hire him?

13 A. I'd say 15 years ago, perhaps.

14 Q. What are his typical hours?

15 A. He has a day job as an airport mechanic,  
16 he comes in after work, usually 4 to 6.

17 Q. So, otherwise, it's just you in the  
18 store --

19 A. Yes.

20 Q. -- behind the counter?

21 A. Yes.

22 Q. Okay. No any -- no contractors or other  
23 sorts of hourly employees that you pay to work behind  
24 the counter?

25 A. No.

1 Q. Okay. Is ADCO open seven days a week?

2 A. No.

3 Q. Okay. What are its regular schedules?

4 A. Tuesday, Thursday, Friday, ten to six.

5 Wednesday, Saturday, ten to two.

6 Q. When David O'Malley is working in the  
7 evening, are you typically there, or do you take  
8 those nights off?

9 A. I'm always there.

10 Q. And it doesn't sound like it from your  
11 previous answers, but have you ever worked in any  
12 other business selling firearms?

13 A. No.

14 Q. Had you ever met Jerry Zohn before the  
15 summer of 2020?

16 A. No.

17 Q. Since the summer of 2020 have you had any  
18 communications at all with Jerry Zahn?

19 A. No.

20 Q. All right. Can you please walk me through  
21 a typical gun sale at ADCO. I know that they're  
22 going to vary depending on a lot of different  
23 factors, but someone walks in the door, can you walk  
24 me through what is your practice with regard to all  
25 your sales?



1           A.       There really isn't a standard. Every  
2 customer's different. Being a small store, I know  
3 most of them, most of them are repeat customers. I  
4 can't really get into hypotheticals.

5           Q.       So if it's someone that you don't know,  
6 that's not a repeat customer, do you have any sort of  
7 standard practice for them?

8           A.       They do get additional scrutiny,  
9 questions, guidance.

10          Q.       How come?

11          A.       Because I do not know them. I need to  
12 know why they're there, what they're looking for, so  
13 I can help them, I can offer them the right advice.  
14 Ninety percent of my business is word of mouth, and  
15 most customers I do not know are referred by somebody  
16 else.

17          Q.       You mentioned: Ask additional questions,  
18 need to know why they're there. Why is that?

19          A.       My first question to a customer I've never  
20 seen before is, "Are you looking for anything  
21 particular today?" And, based on their response,  
22 appropriate questions and answers follow.

23          Q.       So -- and I appreciate that, and we can go  
24 through some other questions, but my question was a  
25 bit different, it was, you know, you said that you

1 need to know why someone is there that hasn't been in  
2 there before. Why do you say that? Why do you need  
3 to know that a new person is in there and why they're  
4 there?

5 A. I don't sell any hunting-type firearms --

6 Q. Okay.

7 A. -- or equipment. If a customer comes in  
8 and is asking for my advice to go deer hunting next  
9 weekend, I can stop wasting their time and send them  
10 up to Cabela's or Bass Pro.

11 Q. Okay. Any other reasons why you need to  
12 know why a new customer is in your store?

13 A. If they're looking to make a purchase, I  
14 will need to know what they are trying to purchase  
15 their item for. Again, if it's somebody that wants  
16 to get into hunting, I am not going to sell them a  
17 snub-nosed revolver.

18 Q. Okay. And you said the first question you  
19 ask them, and that sounds like it's kind of your  
20 standard, if it's someone new, ask them if there's  
21 anything in particular you can help them with, right?

22 A. Correct.

23 Q. Is there anything else that you typically  
24 ask?

25 A. All depends on the situation.

1 Q. Okay. And we can get into some situations  
2 in a bit.

3 Do you have an understanding of the  
4 meaning of a straw purchase?

5 A. I do.

6 Q. Okay. What is that understanding?

7 A. It is when a person is purchasing a  
8 firearm for somebody that legally can't themselves,  
9 or they are purchasing it -- purchasing it on behalf  
10 of somebody else with their money.

11 Q. Okay. And do you have an understanding of  
12 the difference between a bona fide gift and a straw  
13 purchase?

14 A. I do.

15 Q. Okay. And can you explain to me your  
16 understanding?

17 A. If it is your birthday and you express  
18 interest in a firearm, your husband, brother, father,  
19 whatever, could legally buy that firearm and gift it  
20 to you as a gift. If it was not your birthday and  
21 they were buying that firearm for you for taking them  
22 to the airport the day before, that would be a straw  
23 purchase.

24 Q. Because there's some value or quid pro quo  
25 involved, right?

1           A.       Correct.

2           Q.       Okay.  If I'm with a friend, spouse,  
3 whatever, and it's my birthday -- actually, strike  
4 that.

5                   And I am not there and someone is there on  
6 my behalf wanting to buy me a firearm for my  
7 birthday, what do they have to do?  Does that make  
8 sense?

9           A.       Yes.

10          Q.       Okay.

11          A.       Do they know what firearm you want?

12          Q.       I don't know.  Is there a different answer  
13 based on that?

14          A.       Well, it depends on -- long guns or  
15 handguns have different roles for crossing state  
16 lines.  Where does this person live?  Where does the  
17 person live who it's being gifted to?

18          Q.       Okay.  Does it depend on the type of gun  
19 if they're able to walk out with it?

20          A.       If the person purchasing the firearm and  
21 the person it is being gifted to both live in the  
22 same state, nothing matters.  If one of them or both  
23 live out of state, it's a different can of beans.

24          Q.       Okay.  Would you walk me through what you  
25 personally view as an indicator of a potential straw

1 purchase?

2 A. Every sale could be a straw purchase.

3 Q. Can you think of any sort of indicators  
4 that would stand out to you as a potential straw  
5 purchase or cause you to go, huh, that doesn't seem  
6 right, and ask a few more questions?

7 A. One of the more common straw purchase  
8 attempts are purchases online where the firearm is  
9 shipped to my store and a customer will come in to  
10 pick it up. Now, the person who purchased it and  
11 shipped it is the one who intends to be the owner,  
12 but they send somebody else to take possession of the  
13 firearm.

14 Q. So what do you do in that situation?

15 A. If it's somebody I do not recognize, they  
16 will come in, they will ask for a firearm. I will  
17 ask them what gun it is. If they know what gun it  
18 is, that's a good sign. If they have to pick up  
19 their phone and text whoever they bought it from  
20 [verbatim] to ask what kind of gun it is, that's a  
21 bad sign.

22 If I challenge them on what color or  
23 caliber it is and they don't know, that's a bad sign.

24 The firearm may be sitting right in front  
25 of me and I know exactly what it is, but I will ask

1     them, "Well, here it is with this name on it, but you  
2     were looking for a .40 caliber, this one's a .38  
3     Special." If they hesitate or don't have a straight  
4     answer, then that could be another sign.

5           Q.       And if you observe, when you said, you  
6     know, that's a good sign, that's a bad sign, if  
7     you're observing some bad signs, what is your  
8     response? What actions do you take?

9           A.       I have a three-tiered level of scrutiny  
10    for that kind of stuff.

11          Q.       Okay.

12          A.       I make myself aware of everything that's  
13    going on, any other good signs/bad signs I consider  
14    an alarm. Now, an alarm after clarification could  
15    just go back to being aware. And aware could also  
16    lead to an alarm which would end a sale. For  
17    instance, if the person has to pick up the phone and  
18    call, "Hey, you said it was a .38 but there's a  
19    9-millimeter here," then it's over.

20          Q.       And when you say "it's over," what do you  
21    do?

22          A.       Depends on the person. I'm in my store  
23    alone most of the time. In the winter it gets dark  
24    early. I am extremely nonconfrontational as I am  
25    standing there with a loaded gun so any confrontation

1 is probably going to end in gunfire. I will --  
2 Again, it depends on the person.

3 I may go completely through the process  
4 and fake and pretend to do a background check and  
5 tell them, "Oh, there's something wrong in your  
6 background. You can't take it home today." Or, if I  
7 don't believe there's any threat at all, I'll just  
8 tell them, "No, I'm going to have to send this back  
9 to where you got it." It depends on the situation.  
10 But for one way or another, if I believe someone is  
11 getting a gun that is not for them, they do not get  
12 the gun.

13 Q. And in those situations do you contact law  
14 enforcement?

15 A. I send all -- Yes, I send all that kind of  
16 information, I'll make a screenshot from my security  
17 camera and send it to my contact in the Sylvania  
18 Police Department.

19 Q. Who is your contact at the Sylvania Police  
20 Department?

21 A. Detective Justin Music.

22 Q. If someone walks into your store that  
23 you've never seen before and, you know, it's not the  
24 sort of online shipping to the store situation,  
25 texting someone, is there anything else that you

1 would see that would cause you to sort of go through  
2 your three-tiered level of scrutiny?

3 A. What do they look like. What do they  
4 smell like. Do they speak proper English. How are  
5 they dressed.

6 Q. Okay. And why are those things that  
7 matter to your decision to go through the scrutiny?

8 A. If a fellow comes in with a neck tattoo  
9 and smells like marijuana, he's not going to get a  
10 gun.

11 Q. Because you're concerned about potential  
12 criminal or gang involvement?

13 A. I am concerned about that, yes.

14 Q. Any other reason?

15 A. Self-preservation. I've been doing this  
16 for over 20 years, any firearm that could come back  
17 to me as a trace request, whether it was used in a  
18 crime or not, puts me on ATF radar, so I do  
19 everything to protect myself, my business, and the  
20 community as well.

21 Q. What they look like, smell like, proper  
22 English. Any other red flags that you can think of,  
23 or even if they're not red flags, indicators that  
24 would maybe make you go through your three-tiered  
25 level of scrutiny?



1           A.       The questions they ask. The way they  
2 respond to my answers.

3           Q.       What are you paying attention to with the  
4 questions they ask and the way they respond to your  
5 answers?

6           A.       What was the question again?

7           Q.       You said that you're paying attention to  
8 the questions that they ask and the way that you  
9 respond, right?

10          A.       Now you're getting into hypothetical  
11 scenarios that -- I can't answer like that.

12          Q.       No, I'm not trying to get into  
13 hypotheticals. You said that you're paying attention  
14 to the questions that they ask or the way that they  
15 respond. Are there certain things that you're  
16 looking for, like, for instance, an unfamiliarity  
17 with guns, or confusion or, you know, what are you  
18 looking for in terms of what they're asking?

19          A.       All the above.

20          Q.       If you ask someone in the store what their  
21 purpose for the firearm is and they can't articulate  
22 a response in terms of what they're using the firearm  
23 for, is that a red flag for you?

24          A.       Yes.

25          Q.       Talk to me about when two people come into

1 the store to buy one gun. Does that trigger your  
2 response to go at least start your three-level  
3 inquiry?

4 A. My three-level inquiry starts with every  
5 customer.

6 Q. Okay. So two people walk into the store  
7 together, does that give you -- I'm going to use the  
8 word "alarm." Does that set off any sort of alarm?

9 A. No.

10 Q. Why not?

11 A. They didn't do anything to cause alarm,  
12 just . . .

13 Q. If there's two people in the store  
14 purchasing one gun and one individual expresses  
15 interest in the firearm and the other person does  
16 not, would that be an alarm for you?

17 A. No.

18 Q. Let me clarify. If the person purchasing  
19 the gun does not express a particular interest in the  
20 gun, but the individual that they're with, who is not  
21 the purchaser, does, does that set off an alarm for  
22 you?

23 A. That could set off an alarm, but you're  
24 discounting the questions I would have asked before  
25 they got to that point.

1 Q. Okay. So let's do that. Let's go through  
2 those questions that you would have asked before it  
3 got to that point.

4 Can you walk me through the questions that  
5 you would ask.

6 A. Again, I need -- I can't do hypotheticals.  
7 Every situation, everything is different. It's based  
8 on the individual, height, smell, characteristic.  
9 Every transaction is specific to that transaction,  
10 there is no "one size fits all."

11 Q. Okay.

12 If we take out some of the other factors  
13 that you mentioned, so any sort of language barrier  
14 or neck tattoos, et cetera, and there's a couple or  
15 two people in the store, one's buying the gun, not  
16 particularly interested in the transaction, the other  
17 person, not buying the gun, very interested. Are  
18 there questions, regardless of some of those other  
19 things that, I know, make it specific to the  
20 situation, are there questions, though, that you  
21 would ask regardless?

22 A. Yes.

23 Q. Okay. What are those questions?

24 A. I need to see it play out in front of me  
25 to ask the questions to get the reactions. The

1 answers I get to the questions are every bit as  
2 important as the questions I get..

3 Q. Okay. So you can't give me one example of  
4 a question that you would ask of two people in a  
5 store where the person buying it isn't particularly  
6 interested but the other one is?

7 A. There are too many scenarios. I can't do  
8 hypotheticals.

9 Q. Would you ask "Is the gun for you?" to the  
10 person that's buying it?

11 A. If it advances to a stage where somebody's  
12 going to make a purchase, I will make sure the person  
13 that is filling out the form is the person who is  
14 buying the gun who is going to be the owner of the  
15 gun.

16 Q. Okay. And how do you do that?

17 A. By that. I ask them if they are the buyer  
18 of the gun and explain the form to them.

19 Q. Okay. Would you agree that a potential  
20 indicator of a straw purchase is where the person  
21 buying the gun is not using their own money to pay  
22 for the gun?

23 A. No.

24 Q. Why not?

25 A. That would defeat the purpose of gift

1 certificates.

2 Q. Okay. Then I'll rephrase my question.

3 That's a good clarification.

4 If there are two people together and the  
5 person buying the gun isn't using their own money,  
6 they're using the individual who's with them, they're  
7 using their money, would that be a potential  
8 indicator of a straw purchase?

9 A. If the person who was buying the gun,  
10 taking possession of the gun, has filled out the  
11 paperwork saying they are the buyer taking possession  
12 of the gun, and somebody wants to step in at the last  
13 minute and hand me cash, there will be a conversation  
14 about whether it is a gift, and then I will explain  
15 to them a straw purchase, and I accuse them of being  
16 ATF agents setting me up.

17 Q. Has that ever happened, where there were  
18 undercovers?

19 A. I assume every customer is an undercover,  
20 but I don't believe it has ever actually happened.

21 Q. Yeah. Okay.

22 Have you ever intercepted a straw purchase  
23 before?

24 A. I'm sure I have.

25 Q. Can you think of any specific time where

1 you believed that a straw purchase was underway and  
2 you stopped the sale and you contacted your contact  
3 at Sylvania?

4 A. It's happened dozens of times over the  
5 years. I can't name a particular one.

6 Q. Okay. So your testimony is that it's  
7 happened numerous times over the years that you've  
8 owned ADCO?

9 A. I would define "numerous" as maybe a dozen  
10 or so in 20-some years, yes.

11 Q. Okay. And I want to be clear, we're not  
12 talking about failed background check. We're talking  
13 about you believe that there is a potential straw  
14 purchase underway and you say "No" to the sale.  
15 Right?

16 A. That is correct. And I have it set up  
17 with my contact at the police department that I will  
18 notify him prior to running the background check, so  
19 I have an excellent established record of stopping  
20 prohibited sales before ATF denied them.

21 Q. Sorry. Can you explain that? Before each  
22 purchase you notify your contact of a sale before you  
23 run the background check?

24 A. A suspicious sale.

25 Q. Okay.

1           A.        If I have determined someone is not  
2 getting a firearm, they are more than likely still  
3 going to fill out the paperwork, because I'm not  
4 going to be confrontational. I will make up an  
5 excuse why they're delayed or I, generally, won't  
6 even do the background check while they're standing  
7 there, I'll just say "The system's down."

8                    And when I have a driver's license, I can  
9 take a picture of their driver's license, send it to  
10 my contact so we have the name, ID they're using, and  
11 it will say, "Here is so-and-so."

12                   I looked him up. I have a bookmark to the  
13 Lucas County court records. Once I have their  
14 driver's license and they fill out the form, I've got  
15 their social security number and their last name, I  
16 can see what criminal history they have. I will send  
17 that to my contact at the police department: Here's  
18 so-and-so, he's got two pending drug charges, he  
19 tried to buy a gun, and I told them he was delayed.  
20 And then it goes from there. But they do not get the  
21 gun.

22                   But every -- every time I suspect there's  
23 something suspicious, I notify my contact at the  
24 police department and I run -- eventually will run  
25 them through the NICS program so NICS will have a

1 record of their attempted purchase.

2 Q. What program?

3 A. NICS. The --

4 Q. N -- Can you spell it?

5 A. Pardon me?

6 N-I-C-S, I believe.

7 Q. Is that --

8 A. That's the background --

9 Q. The ONICS. Yeah. Okay.

10 A. Yeah.

11 Q. I didn't -- Okay.

12 So when you run it through the NICS, do  
13 you ever call and speak with a representative of  
14 NICS, or do you do all eChecks?

15 A. eCheck.

16 Q. Okay. Have you ever -- have you or your  
17 employee ever spoken with a representative of NICS  
18 while you're running a check?

19 A. Yes.

20 Q. Okay. Can you specifically recall any  
21 scenarios like that?

22 A. A couple days ago the eCheck system was  
23 down and I had to do it the old-fashioned way on the  
24 phone.

25 Q. Okay. Other than that, is there a reason



1 that you would try to get on the phone with someone  
2 from NICS?

3 A. No. They're only there for background  
4 checks. They don't give any information or guidance  
5 or -- they don't -- they are not conversational.

6 Q. Okay. Would you agree that an indicator  
7 of a potential straw purchase is where individuals  
8 leave and reenter the store more than once?

9 A. No.

10 Q. Leave without buying anything, come back?

11 A. No.

12 Q. Okay. Why not?

13 A. It's shopping. There are four or five  
14 other gun stores within 20 miles of my store.

15 Q. And would you agree that even if an  
16 indicator or a red flag isn't enough to just all-out  
17 stop the transfer, do you agree that you have a  
18 responsibility to do more, to take additional steps?

19 A. I do take additional steps, yes.

20 Q. Okay. You can't just transfer the firearm  
21 in the face of indicators or red flags, correct?

22 A. If I don't believe a transaction is  
23 legitimate, no, I do not transfer the firearm.

24 Q. Okay. And over the years, fair to say  
25 you've handled hundreds? Thousands of transactions?

1           A.       I arrange about a thousand a year, maybe  
2 more, so over 20,000.

3           Q.       Okay. You've dealt with thousands of  
4 customers?

5           A.       Yes.

6           Q.       Okay. So you would consider yourself a  
7 seasoned firearms salesperson. Fair?

8           A.       I do.

9           Q.       Okay. And, given that, would you say that  
10 you can pretty easily identify a first-time gun  
11 buyer?

12          A.       Yes.

13          Q.       Okay. What are some sort of telltale  
14 signs that someone's a first-time gun buyer?

15          A.       It's usually one of the first questions I  
16 ask of somebody I don't know.

17          Q.       "Have you ever bought a gun before?"

18          A.       Correct.

19          Q.       Okay.

20                    But would you agree that it's typically  
21 pretty easy to spot someone who knows what they're  
22 doing, who has experience with firearms, from someone  
23 who's never purchased one before?

24          A.       I don't understand the question.

25          Q.       Would you say that it's typically pretty

1 easy to identify someone who has no experience with  
2 firearms, hasn't purchased one before, versus a  
3 seasoned person who's familiar with firearms, has  
4 bought a bunch?

5 A. New buyers will identify themselves as new  
6 buyers. It's obvious, yes.

7 Q. And, given your experience, would you say  
8 you've become pretty good at detecting when a  
9 customer is lying to you?

10 A. Yes.

11 Q. Why do you say that you've gotten pretty  
12 good at detecting when someone's lying to you?

13 A. Years of doing it.

14 Q. Do you typically try to make eye contact  
15 with those involved in a potentially suspicious  
16 transaction?

17 A. Yes. Eye contact is very important.

18 Q. Okay. Why is it important?

19 A. If a person is maintaining eye contact,  
20 it's generally a show of honesty.

21 Q. How about facial responses or body  
22 language, do you pay attention to that?

23 A. Yes. As I said, the responses I get to my  
24 questions are as important as the questions I ask.

25 Q. So when you say the responses to your

1 questions, you're not just talking verbal responses.

2 Fair?

3 A. Correct.

4 Q. Okay. What kind of body language/facial  
5 expressions would you give you pause or concern?

6 A. Nervousness. Twitching. Shaking. Not  
7 making eye contact. Ignoring my advice.

8 Q. Do you agree that, as a licensed firearms  
9 dealer, that you have a responsibility to learn how  
10 to identify straw purchasers?

11 A. Yes.

12 Q. And that developing that skill is an  
13 important tool in trying to keep guns out of the  
14 wrong hands?

15 A. Yes.

16 Q. And does part of that involve making sure  
17 that the purchaser has a genuine interest in a gun?

18 A. Yes.

19 Q. So one of the first things that you should  
20 figure out, then, is who is buying the gun and who  
21 the gun is intended for. Fair?

22 A. I make the determination of who is buying  
23 the gun, correct.

24 Q. And who the gun is intended for?

25 A. Yes.

1 Q. If you're talking to two people buying one  
2 gun and the person that identifies themselves as the  
3 purchaser -- strike that.

4 If you are -- if there are two people and  
5 one of them has identified themselves as the  
6 purchaser, but the other person is dominating the  
7 conversation with you, answering your questions,  
8 asking questions, is that a potential red flag?

9 A. Purchasers will bring people with them  
10 that are more experienced to help guide them in their  
11 decisions at times, I will have to determine that in  
12 those scenarios.

13 Q. And one of the ways that you would maybe  
14 do that is asking the purchaser, not the  
15 more-experienced friend, what they are intending to  
16 do with the gun?

17 A. Correct.

18 Q. And it's important for you to be alert to  
19 who is paying for the firearm versus who is  
20 completing Form 4473. True?

21 A. Yes.

22 Q. So you also need to be cognizant of  
23 couples where one person selects the firearm, but  
24 it's the other person filling out the Form 4473,  
25 right?

1 A. That wouldn't happen.

2 Q. Why?

3 A. There would have to be a discussion first  
4 about gifting.

5 Q. Okay. You mentioned, I think, and I don't  
6 want to put words in your mouth, telling the customer  
7 that it's illegal to make a straw purchase or buy a  
8 firearm for someone that's not you; is that true?

9 A. I don't remember.

10 Q. If you have a suspicious encounter and you  
11 hand the form to someone, what do you explain to them  
12 about the consequences of buying a gun for someone  
13 that's not themselves?

14 A. That depends on the situation. If there  
15 was enough suspicion that that's an issue, I wouldn't  
16 say anything to them because I wouldn't finish the  
17 sale. I'd let them fill out the form and -- it  
18 wouldn't happen.

19 Q. Uh-huh.

20 A. Again, I don't argue with customers in my  
21 store.

22 Q. Uh-huh. If there's not that level of  
23 suspicion but maybe just an "off" feeling, what do  
24 you tell them, if anything, about the form or the  
25 ramifications?

1           A.       The "off" feeling is that level of  
2 suspicion.

3           Q.       Okay. So it sounds like you agree that  
4 you should always be asking yourself: What can I do  
5 to detect an attempted straw purchase and what  
6 actions should I take.

7           A.       Yes.

8           Q.       And that if something doesn't feel right  
9 or feels off, you have a duty to take additional  
10 steps. True?

11          A.       True.

12          Q.       Would you agree that it's better to err on  
13 the side of caution when it comes to intervening in  
14 something that feels off to you?

15          A.       As I said earlier, it is as much about the  
16 preservation of my business as it is stopping a straw  
17 purchase. Anything that could remotely come back to  
18 me, I will stop the sale.

19          Q.       Can you think of any time where you've  
20 stopped a potential straw purchase where maybe you  
21 didn't think that it was a potential criminal, so  
22 some of the examples that you were talking about like  
23 a neck tattoo, but you just suspected that the gun  
24 was for someone else?

25          A.       Yes.

1 Q. Okay. Can you describe anything about  
2 that?

3 A. It's quite common right now, a person will  
4 come in to purchase an AR15 lower, or they will buy  
5 it online, and they will come in with a friend or a  
6 father, brother, whatever, and the purchaser is under  
7 21, and you have to be 21 to buy a handgun. So I see  
8 innocent straw purchase attempts quite often where  
9 the son will be like: Oh, man, I can't get it. And  
10 the dad will say, "Well, here, I'll just get it for  
11 you." And then I have to be the bad guy and explain  
12 to him that he's buying it because his kid can't,  
13 which makes it a straw purchase.

14 Q. Okay. Other than that situation, any  
15 other examples you can think of?

16 A. No.

17 Q. You would agree, though, that you don't  
18 have to look, act, or smell like a criminal to be  
19 potentially involved in a suspicious transaction; is  
20 that fair?

21 A. That is true.

22 Q. Okay.

23 All right. I have a few more questions  
24 along these lines and then we can take a quick  
25 five-minute break. Is that fine?



1 A. Yes.

2 Q. Okay. You agree that it is yours and your  
3 employee's responsibility to be engaged with every  
4 firearms purchase?

5 A. I don't understand the question.

6 Q. Sure. I can clarify.

7 When I say "engaged," I mean talking to  
8 the purchaser, asking questions, responding to their  
9 questions, not just a simple greeting and call it a  
10 day.

11 A. Correct.

12 Q. Okay. And it's yours and your employee's  
13 responsibility to be confident that the sale is  
14 lawful before you make the sale, correct?

15 A. Correct.

16 Q. And I think your answer is going to be Yes  
17 based on your practice of turning down suspicious  
18 transactions, but you agree that you have every right  
19 to deny a firearm to anyone that just makes you feel  
20 uncomfortable or there's an "off" feeling; is that  
21 fair?

22 A. That is correct.

23 Q. And not only do you have that right, but  
24 you have a responsibility to do that. True?

25 A. True.

1 Q. Would you say that you have a duty or a  
2 responsibility to stay apprised of industry standard  
3 best practices?

4 A. Yes.

5 Q. Do you subscribe to any sort of trade  
6 industry magazines, periodicals, publications?

7 A. No.

8 Q. Do you listen to any podcasts about the  
9 subject or radio shows?

10 A. Yes.

11 Q. Okay. Which ones?

12 A. I couldn't name them. There are all kinds  
13 of attorney -- armed attorneys YouTube videos and  
14 podcasts and internet forums for FFL dealers.

15 Q. Are you familiar with ATF's campaign, the  
16 "Don't Lie For the Other Guy" campaign?

17 A. Yes.

18 Q. Okay. What do you know about it?

19 A. It's their campaign for education about  
20 straw purchases.

21 Q. Are you aware that the program gives free  
22 kits to retailers?

23 A. Yes.

24 Q. Have you ever obtained one?

25 A. Yes.

1 Q. Okay. When was that?

2 A. Throughout the years.

3 Q. How many, roughly?

4 A. Dozens.

5 Q. And what is typically included in a kit?

6 A. A placard, a couple stickers, and a stack  
7 of brochures.

8 Q. And where do you keep those -- well, let's  
9 say in July of 2020, did you have anything like that  
10 in your store?

11 A. Yes.

12 Q. Okay. What did you have?

13 A. The brochures and the placard, and  
14 there's --

15 Q. Okay.

16 A. -- been a sticker in my window for years.

17 Q. Okay. Where do you keep the placard and  
18 the brochures?

19 A. In front of the front door.

20 Q. And are those placards and brochures  
21 intended for customers?

22 A. Yes.

23 Q. Have you watched any of the Don't Lie For  
24 the Other Guy's training videos?

25 A. Yes.

1 Q. Roughly, when was the last time you  
2 watched one of them?

3 A. Years ago. I couldn't tell you.

4 Q. And those -- do those training videos,  
5 from your recollection, go over how to potentially  
6 detect a straw purchase?

7 A. I don't remember.

8 Q. Okay. Do you have any posters put up in  
9 your store about straw purchases or consequences of  
10 straw purchases?

11 A. If you want to define the placard that  
12 holds the brochures, yes.

13 Q. Okay. Anything else?

14 A. No.

15 Q. No counter maps or postcards or anything  
16 like that --

17 A. No.

18 Q. -- other than what you've told me?

19 A. No.

20 Q. Okay. Are you aware that the NRA has  
21 similar programming regarding straw purchases?

22 A. Yes.

23 Q. Have you accessed any of their training or  
24 training materials?

25 A. No.

1 Q. What about NSSF, you're aware that they  
2 have similar programming?

3 A. Yes.

4 Q. Okay. Have you accessed any of their  
5 programming or training?

6 A. Yes.

7 Q. Okay. Tell me what you remember that  
8 you've accessed.

9 A. YouTube videos.

10 Q. Specific to trying to detect a straw  
11 purchase?

12 A. I've watched several of their videos, I'm  
13 sure some of them included straw purchase.

14 Q. Other than what we've discussed, have you  
15 attended any trainings or workshops where straw  
16 purchases were discussed?

17 A. No.

18 Q. Have you trained your employee on straw  
19 purchases?

20 A. Yes.

21 Q. Okay. How and when have you trained your  
22 employee on straw purchases?

23 A. We've worked together for 15 years.  
24 There's no formal training. We just watch out for  
25 each other.

1 Q. Do you know whether he's ever intercepted  
2 or intervened in a straw purchase?

3 A. I'm sure he has.

4 Q. Can you think of anything specific?

5 A. No.

6 Q. Have you ever done any sort of role-play  
7 with your employee on how to react to various  
8 scenarios to identify a straw purchase?

9 A. Yes.

10 Q. You have?

11 A. Yes.

12 Q. Yeah. Can you think of the last time you  
13 did that?

14 A. A year or so.

15 Q. Okay. What sort of scenarios do you act  
16 out?

17 A. If an attempted straw purchase is really  
18 bad and really blatant, I will go through that  
19 scenario with the customer -- with my employee just  
20 to keep on track of what's -- the new techniques  
21 people are using.

22 Q. What new techniques have you noticed? I  
23 know you discussed the online.

24 A. The online is the new -- is the latest way  
25 for people to attempt straw purchases.

1 Q. Okay. Any other sort of recent techniques  
2 that you've seen, or trends?

3 A. No.

4 MS. WEAVER: All right. Are we good to  
5 take a quick five-minute break off the record?

6 THE WITNESS: Yes.

7 MR. BAHRET: Sure.

8 MR. JOHNSON: Sure.

9 MR. BAHRET: Yeah, Chelsea, do you have  
10 any idea how much longer you'll be?

11 THE VIDEOGRAPHER: Off the record, 2:11.

12 (Recess taken.)

13 THE VIDEOGRAPHER: Okay. We're back on  
14 the record, 2:19. Media No. 2. Please proceed.

15 Q. (By Ms. Weaver) Great. We just got back  
16 from a quick break and I want to switch gears a bit.

17 How, Mr. Thompson, did you obtain your  
18 FFL?

19 A. I applied for it.

20 Q. What type do you have?

21 A. Standard dealer.

22 Q. And what does that license allow you to  
23 do?

24 A. Buy and sell firearms.

25 Q. Have you ever held any other type of

1 license before?

2 A. No.

3 Q. Did you have to do any trainings to get  
4 that license?

5 A. No.

6 Q. Do you hold any credentials or other  
7 licenses other than your standard FFL?

8 A. I'm an NRA pistol instructor.

9 Q. What does that entail?

10 A. I am able to instruct pistol courses that  
11 qualify for Ohio concealed carry permits.

12 Q. Do you have to do any sort of training or  
13 education to be able to be a NRA pistol instructor?

14 A. There was a full-day class to get the  
15 certification.

16 Q. How often do you teach those trainings or  
17 courses?

18 A. Almost never.

19 Q. Have you ever received any sort of  
20 disciplinary action, suspension, or revocation of  
21 your FFL?

22 A. No.

23 Q. Do you belong to any professional or trade  
24 organizations?

25 A. Other than the NRA, no.



1 Q. Okay. Do you have any other sort of  
2 involvement with the NRA other than that you are a  
3 pistol instructor?

4 A. No.

5 Q. Do you attend any sort of meetings or  
6 conventions with the NRA, or have you ever?

7 A. No.

8 Q. All right. Explain to me your  
9 understanding of the purpose of the firearms  
10 transaction record that we can refer to as the Form  
11 4473.

12 A. What about it?

13 Q. Explain to me your understanding of what  
14 its purpose is. Why do people fill it out?

15 A. It's required recordkeeping for firearms  
16 transfers.

17 Q. Do you agree that one important purpose is  
18 to make sure that the buyer isn't prohibited from  
19 owning a firearm?

20 A. Yes.

21 Q. And that to ensure that the person  
22 purchasing the gun is purchasing the gun for  
23 themselves?

24 A. Yes.

25 Q. Do you have a -- all customers complete a

1 Form 4473 for all firearms sales?

2 A. Yes.

3 Q. And does that include accessories?

4 A. An accessory is not a firearm.

5 Q. So only for firearm sales, and no Form  
6 4473 for accessories. Fair?

7 A. Correct.

8 Q. Okay. And when you present the form to a  
9 potential purchaser, do you tell the purchaser  
10 anything about what the form is or what it requires?

11 A. Yes.

12 Q. Great. What do you tell them?

13 A. You need a valid State-issued ID with a  
14 current address. This is the form you have to fill  
15 out. The first question's asking if you are buying  
16 it for you. Leave the last question blank if you're  
17 a U.S. citizen. Any questions, let me know.

18 Q. Do you read any of the qualifying  
19 questions, like from Section 21 to the buyer?

20 A. I don't understand the question.

21 Q. Do you read out loud any of the qualifying  
22 questions to the buyer?

23 A. No.

24 Q. Does your practice in presenting the form  
25 to the buyer change at all if it's someone that is a

1 first-time gun purchaser?

2 A. No.

3 Q. Do you typically fill out any part of the  
4 form before the potential purchaser fills out their  
5 respective portion?

6 A. No.

7 Q. Which sections do you as the seller  
8 complete?

9 A. I don't have one in front of me to see  
10 here.

11 I just fill out the ID verification and  
12 handgun selection, date it was transferred to next,  
13 the NTN number, and if they use a carry permit, I'll  
14 fill out the carry permit information.

15 Q. For the record, are you referring to --  
16 your counsel handed you a document. Are you  
17 referring to a blank form or the one that was  
18 produced in this case that was Jerry Zahn's?

19 A. That was Jerry Zahn's.

20 Q. Okay.

21 Are there other pages that don't get  
22 filled out that are attached to the form?

23 A. Yes.

24 Q. Do you know what those pages contain?

25 A. Instructions for the questions.

1 Q. Do you provide the instructions to the  
2 customer?

3 A. Yes.

4 Q. Do you say anything to the customer about  
5 the instructions?

6 A. No.

7 Q. Following a transaction does ADCO provide  
8 a copy of the form to the purchaser?

9 A. No.

10 Q. Once the purchaser has completed their  
11 sections and signed, do you ask any follow-up  
12 questions?

13 A. It depends on the situation.

14 Q. What does it depend on?

15 A. If they made a mistake on the form that  
16 they corrected, that would prompt a conversation.

17 Q. Okay. Any other time you'd ask any  
18 follow-up questions?

19 A. No.

20 Q. How long does ADCO keep the form?

21 A. Forever.

22 Q. Has ADCO ever been audited by the ATF?

23 A. Yes.

24 Q. When, approximately, was it audited?

25 A. My last audit was last September.

1 Q. How many times have you been -- has the  
2 store been audited?

3 A. I believe five.

4 Q. And in those audits, if you know, do they  
5 involve the forms, shipping, files, documents, or are  
6 there specific things that they're looking for in the  
7 audit?

8 A. They look over everything.

9 Q. Okay. Of those five or so audits, what  
10 have been the results?

11 A. I passed. No concerns.

12 Q. Have you obtained the results of those  
13 audits?

14 A. No.

15 Q. Would you have access to the dates that  
16 those audits took place in your records?

17 A. No.

18 Q. Okay. So you have nothing in your  
19 possession related to those audits including the one  
20 from last September?

21 A. No.

22 Q. All right. Can you walk me through the  
23 process of completing the NICS? Does that happen  
24 after they complete the form, or do you do it while  
25 they're completing the form?

1 A. I do it after the form is completed.

2 Q. Are you required to complete an NICS on  
3 all firearms purchases?

4 A. If they don't have a valid Ohio carry  
5 permit, they have to have a NICS transaction number  
6 issued.

7 Q. Okay.

8 All right. Let's talk about the July  
9 2nd, 2020, sale of the gun that's at issue in this  
10 case. Do you agree that what took place in your  
11 store on July 2nd surrounding the sale to Jerry  
12 Zahn was a straw purchase?

13 A. Yes.

14 Q. And do you agree that what happened in the  
15 store between you, Allison, and Jerry Zahn is  
16 important to this case?

17 A. Yes.

18 Q. All right. Let's talk about what you  
19 recall. Prior to July 2nd, 2020, had you ever seen  
20 Allison Roebke in your store?

21 A. No.

22 Q. Had you ever seen Jerry Zahn in your  
23 store?

24 A. No.

25 Q. Do you know whether your employee ever saw

1 Allison or Jerry in your store?

2 A. No.

3 Q. No, you don't know, or no, he never did?

4 A. I don't know.

5 Q. Okay. Has he ever told you that he's seen  
6 them?

7 A. No, because I'm there when he's there.

8 Q. Okay. So your testimony is that you had  
9 never seen them before July 2nd.

10 A. Correct.

11 Q. Okay. Tell me everything that you  
12 remember about Allison and Jerry at the store  
13 starting from when you see them walk in together on  
14 July 2nd of 2020.

15 A. He parked his car in front of my door,  
16 which was the first thing I saw, because it's a pet  
17 peeve of mine.

18 Q. Like, not in a parking space?

19 A. It's not a parking space, no. He parked  
20 right in front of the door.

21 Q. Okay.

22 A. Allison joked about my no-mask sign.  
23 There was a little discussion about if I was going  
24 out of business because during COVID there were  
25 almost no guns in the store. And one of the first

1 words out of Jerry's mouth was, after I greeted him  
2 and asked him what he was looking for, he identified  
3 himself as a new shooter, never had a gun before, and  
4 wanted to get into target shooting.

5 Q. Okay. I'm just going to break a bit of  
6 that down. Did you tell him to move his car, or did  
7 he leave his car there?

8 A. No. He left it there.

9 Q. Okay. First thing, Allison joked about  
10 the no-mask sign. What did she say?

11 A. She just laughed about it. It's  
12 understandable that a gun store doesn't want people  
13 wearing masks.

14 Q. Did you say anything in response?

15 A. I acknowledged her humor.

16 Q. And then who asked you about are you going  
17 out of business?

18 A. Allison.

19 Q. Do you remember what she said?

20 A. She said, "Are you going out of business?"

21 Q. And what did you say?

22 A. I explained the COVID panic buying has  
23 wiped out, pretty much, every gun store in the  
24 country.

25 Q. And then you asked what they were looking



1 for?

2 A. I asked Jerry if he was looking for  
3 anything in particular.

4 Q. Did you ask Allison?

5 A. No.

6 Q. And then what did Jerry say?

7 A. He identified he was a new shooter,  
8 first-time buyer, and wanted to get into target  
9 shooting.

10 Q. So what did you say in response?

11 A. Did you want to shoot paper targets or  
12 people targets?

13 Q. And what did he say?

14 A. He said he just wanted target shooting, he  
15 had no interest in ever shooting people.

16 Q. Okay. Then what happened?

17 A. We talked about firearms for probably 15,  
18 20 minutes, different styles, different sizes. I  
19 taught him the difference between single action and  
20 double action.

21 Q. Okay. And when you were talking about the  
22 firearms for 15 or 20 minutes, were you talking to  
23 Jerry, or Allison, or both of them?

24 A. I was only interacting with Jerry.

25 Q. Did Jerry ask any questions during those

1 15 to 20 minutes?

2 A. Jerry asked a lot of questions. Very good  
3 questions.

4 Q. What questions do you remember him asking?

5 A. What's a good caliber. What's a good  
6 model. How much are -- what's the going rate.  
7 Everything an educated person would want to know  
8 who's concerned about getting into a hobby that  
9 involves firearms would ask, that was probably the  
10 most memorable thing about that interaction with  
11 them.

12 Q. Why was that memorable?

13 A. Because during -- COVID was the busiest  
14 time of the year, ever, and nine out of ten people  
15 that came in did all their research online and had  
16 their minds made up on what they wanted when they  
17 came in the store, and they would ask for my advice  
18 and argue with me.

19 When Jerry and I were speaking, he seemed  
20 to genuinely listen to my advice and contribute  
21 accordingly with his responses.

22 Q. What was Allison doing during those 15 to  
23 20 minutes that you were talking to Jerry about  
24 different options?

25 A. She was standing to his left leaning on

1 the counter.

2 Q. Did Allison say anything to you or Jerry  
3 during those 15-20 minutes?

4 A. When they first came in, we started  
5 talking, she tapped on the glass and said, "Hey,  
6 Jerry, look at this one." And he replied "No." And  
7 that was the extent of her contribution to the  
8 conversation.

9 Q. Which one was she pointing to?

10 A. She was pointing to a SIG Sauer P365,  
11 which led me to a conversation of it is a smaller  
12 gun -- my conversation with Jerry that, yes, that is  
13 a smaller gun, but it is a larger caliber and it will  
14 be much harder to shoot than the firearm I  
15 recommended to him.

16 Q. Other than Allison pointing to the case  
17 and saying, "Hey, Jerry, look at this one," do you  
18 recall anything else that Allison said while she was  
19 in your store?

20 A. That was the last she spoke.

21 Q. Did you observe anything notable between  
22 Jerry and Allison?

23 A. They were two happy people with the body  
24 language of typical boyfriend-girlfriend out  
25 shopping.

1 Q. Why did you think that they were  
2 boyfriend-girlfriend?

3 A. They joked with each other, they smiled,  
4 and when they came in the store later, I was  
5 demonstrating to Jerry how to load and unload the  
6 firearm, when she leaned in, the way she placed her  
7 hand on his arm.

8 Q. What do you mean, when they came in the  
9 store later?

10 A. They were in my store twice that day.

11 Q. So when you're talking about him parking  
12 the car outside your door and making a joke about the  
13 masks, are you referring to the first time they were  
14 there?

15 A. Yes.

16 Q. Okay. And then the 15- to 20-minute  
17 conversation, is that the first time they were there?

18 A. Yes.

19 Q. Okay. And her tapping on the case, first  
20 time?

21 A. Yes.

22 Q. Okay. Did either of them handle any guns  
23 during that first time they were there?

24 A. No.

25 Q. Did you overhear anything that the two of

1       them were saying to each other that wasn't directed  
2       towards you during that first visit?

3           A.       No. After she pointed to the gun, she  
4       didn't say a word.

5           Q.       Okay. Let's talk about the second visit.  
6       So do you remember roughly what time they came for  
7       the first one? Morning? Afternoon?

8           A.       No. Well, earlier in the day.

9           Q.       Okay.

10          A.       It gave them time to leave for an hour or  
11       so and come back.

12          Q.       Was anyone else in the store with you when  
13       Allison and Jerry came the first time?

14          A.       No.

15          Q.       Do you remember whether there were any  
16       other customers there during that first visit?

17          A.       There were not.

18          Q.       Okay. So, then, how much time did you say  
19       go by -- went by before they came back?

20          A.       Two, three hours. I honestly don't know.

21          Q.       Okay. Let's back up a minute. When they  
22       did -- you had 15 to 20 minutes of talking to him,  
23       and he was asking good questions, then what happened?

24          A.       My store only had four handguns in it.  
25       Every gun store was pretty much wiped out. I

1 suggested that he go to Todd's Guns in Michigan and  
2 see what inventory they had. I didn't want to  
3 somewhat pigeonhole him into the only one option I  
4 gave him. And I also suggested they go to Shooters  
5 of Maumee and they can rent a .22 and shoot it and  
6 see that what I was telling them was true.

7 Q. Why were you recommending a .22?

8 A. It's the ideal handgun for somebody that  
9 is a new shooter.

10 Q. Okay. So you recommended those two other  
11 stores, and what did they say or do?

12 A. Jerry said "Okay" and "Thanks for the  
13 advice" and left.

14 Q. Okay. And then a few hours and they came  
15 back?

16 A. Correct.

17 Q. Okay. Tell me everything you remember  
18 about their second visit to your store on July 2nd.

19 A. Parked in front of my door again. They  
20 both came in, typical jovial, and I initiated the  
21 conversation when they came in. I said, "Did you  
22 come back for the .22?" And he shook his head and  
23 smiled and said "Yeah." And at that point I took it  
24 out of the case, showed it to him.

25 His concern was it didn't have an active

1 safety on it. I explained to him it had a passive  
2 safety in the firing pin block. I explained to him  
3 how single action works, that you have to cock the  
4 hammer and pull the trigger, which also acts as a  
5 safety. He accepted all that. I showed him how to  
6 take it apart, load it, unload it. And then he  
7 bought it.

8 Q. How long would you say you were taking it  
9 out of the case, showing it to him, showing how to  
10 load and unload it, how long, roughly, would you say  
11 those interactions took?

12 A. At least 15 minutes.

13 Q. What was Allison doing during that  
14 interaction?

15 A. She was standing to the left of Jerry.  
16 And I made sure to include her when I was showing  
17 Jerry how to load and safely handle the firearm.

18 Q. Why?

19 A. It's something everyone should know. I've  
20 hosted events at local restaurants for no other  
21 reason than to teach people how to unload and safely  
22 handle firearms for people that don't own firearms.

23 Q. Did she ask any questions?

24 A. She did not.

25 Q. Did she hold the gun at all?

1 A. No, she did not.

2 Q. So when you were showing how to take it  
3 apart, all of that, she didn't come in contact with  
4 it?

5 A. No.

6 Q. During the second visit were there any  
7 other customers in the store at any point?

8 A. No.

9 Q. And your employee was not working on  
10 either of those occasions?

11 A. No.

12 Q. Were there cameras in the store that day?

13 A. Yes.

14 Q. How many cameras?

15 A. Two.

16 Q. Where were they located?

17 A. On the walls behind the counter.

18 Q. Was the video of Allison and Jerry on July  
19 2nd recorded?

20 A. I assume it was.

21 Q. How long does ADCO preserve their videos?

22 A. Two weeks.

23 I should clarify that.

24 Q. Sure.

25 A. It's -- our little system, that I believe



1 it records over itself when it gets full or two  
2 weeks.

3 Q. Got it. Whichever is first.

4 A. Correct.

5 Q. Okay.

6 A. Yes.

7 Q. So you would say that the majority of your  
8 interactions on both visits were with Jerry and not  
9 with Allison. True?

10 A. True.

11 Q. Did you observe Allison's body language or  
12 demeanor at all?

13 A. Yes.

14 Q. What did you observe?

15 A. Typical happy, tall, friendly. I was  
16 trying to keep my distance from Jerry a bit because  
17 of COVID, and she was directly across the counter  
18 from me most of the time.

19 Q. Did you stay behind the counter during  
20 both visits?

21 A. Yes.

22 Q. Were you trying to keep your distance from  
23 Jerry because he was older?

24 A. Yes.

25 Q. What did you observe, if anything, about

1 Jerry's demeanor or body language?

2 A. He was just a very happy fellow.

3 Q. Did you ask Allison any questions at all  
4 during either encounter?

5 A. I did not.

6 Q. Did you ask Allison or Jerry how they knew  
7 each other?

8 A. I did not.

9 Q. Okay. Is there anything else that you  
10 remember that Jerry said, Allison said, you said  
11 during either of their visits -- or, during either  
12 visit on July 2nd?

13 A. No.

14 Q. Okay. Do you recall speaking with a  
15 member of Sylvania Township police on July 29th,  
16 2020?

17 A. Yes.

18 Q. Can you tell me everything you remember  
19 from that conversation, please.

20 A. Detective Albright came in, he had a -- I  
21 believe he had a copy of the 4473.

22 Q. He came into the store?

23 A. Yeah.

24 And he asked if I remembered the sale.

25 And I looked at it and I said, "Yeah, I remember it

1 because he parked right in front of my door," which  
2 seemed to catch Albright off guard because I knew  
3 what car the guy drove and where he parked. And I  
4 said something about: Yeah, that was the old guy  
5 with the girlfriend half his age.

6 And Albright chuckled and said, "Well, her  
7 parents said they're just friends," kind of chuckled  
8 back, sarcastically is how I took his tone. And I  
9 said, "Well, whatever they were, they're a strange  
10 dynamic," purely regarding their age difference.

11 And then I -- we discussed the purchase,  
12 and I explained to Detective Albright that there was  
13 nothing to indicate that it was a straw purchase or  
14 anybody was making an attempt to make a straw  
15 purchase. And then Albright explained to me that she  
16 had MS and they were probably just doing it to assist  
17 her suicide.

18 Q. When you said he was surprised that you  
19 knew what car he drove, and I forget what else you  
20 said in that sentence, but why do you think he was  
21 surprised?

22 A. I can't imagine many officers walk into a  
23 situation four weeks out and have a store owner know  
24 where the guy parked and what car it was so specific  
25 as I did.

1 Q. Why do you think you had such a specific  
2 recollection?

3 A. I remember him parking in front of my door  
4 and I specifically -- I didn't see them get out of  
5 the car, but I specifically remember when they got  
6 back in, that he was driving, because she looked like  
7 someone that would be driving a Mini Cooper, not him.

8 Q. Why?

9 A. A tall younger girl driving a convertible  
10 Mini Cooper seems more likely to me than an old man.

11 Q. Any other reasons that you had such a  
12 specific memory of them?

13 A. No.

14 Q. And we can get out the police report as an  
15 exhibit if we need to, but do you remember telling  
16 the police that you had seen Allison and Jerry in the  
17 store together on at least two occasions?

18 A. I did not say they were in there on two  
19 occasions. I said they were in there before.

20 Q. Okay. Are you aware that that's what the  
21 police report says?

22 A. I -- I don't remember exactly what the  
23 police [verbatim] says, but I told Detective Albright  
24 that they were in my store twice.

25 Q. Okay. Did Detective Albright ask any

1 other questions other than do you remember them?

2 A. No.

3 Q. And you told Officer Albright that there  
4 seemed to be a, quote, strange dynamic because of  
5 their age difference?

6 A. Yes.

7 Q. Any other reason?

8 A. No.

9 Q. The police report also provides, like you  
10 testified, that you told the police that there were  
11 no indications that Allison and Zahn were attempting  
12 to make a straw purchase.

13 A. Correct.

14 Q. Okay. Why did you tell the police that?

15 A. I am assuming that was in response to him  
16 asking. I don't remember.

17 Q. When he came into your store, Albright,  
18 did he say why he was there?

19 A. I don't remember how the conversation  
20 started.

21 Q. Did he tell you that Allison died up  
22 front, or did he tell you that after you talked about  
23 the strange dynamic and no other indicators?

24 A. It was towards the end.

25 Q. Why did you believe that he was there

1 potentially about a straw purchase? Or is that why  
2 you thought he was there?

3 A. I had no idea why he was there.

4 Q. Okay. If you had no idea why he was  
5 there, why did you say that there were no concerns  
6 about a straw purchase?

7 A. It must have been in response to one of  
8 his questions.

9 Q. Can you think of anything else that  
10 Albright asked you?

11 A. No.

12 Q. Can you think of anything else that you  
13 told the police?

14 A. No. He's the only one that I talked to  
15 about the matter, I believe.

16 Q. Okay. Have we talked about everything  
17 that you remember, sitting here today, about the  
18 conversation on July 29th with Albright?

19 A. Yes, but I need to correct what I just  
20 said. An ATF agent did come in a week or so later  
21 and take the 4473 Zohn filled out.

22 Q. Okay. A week or so after your  
23 conversation with Albright?

24 A. Yes.

25 Q. Did he say anything -- he or she say

1 anything to you?

2 A. Not at all. Just asked for the form, and  
3 I believe they wrote down their name and phone number  
4 on a business card and left.

5 Q. Do you still have that card?

6 A. I don't know.

7 Q. Okay.

8 Is the first time that you found out that  
9 Allison used the gun that she purchased at your store  
10 to commit suicide, was that when Albright talked to  
11 you?

12 A. Yes.

13 Q. Okay. Did you have any understanding of  
14 the criminal proceedings against Zohn? Were you made  
15 aware?

16 A. No.

17 Q. Okay. Any understanding of his sentencing  
18 or anything like that?

19 A. No.

20 Q. Did anyone involved in the federal  
21 prosecution of Jerry Zohn speak with you?

22 A. No.

23 Q. No other investigators or law enforcement  
24 have spoken to you about Allison Zohn and Jerry  
25 Roebke -- or, Allison Roebke and Jerry Zohn?

1 A. No. No one other than Detective Albright.

2 Q. Okay.

3 All right. So I'm assuming that you only  
4 offered a Form 4473 during the second visit that they  
5 were in your store, correct?

6 A. Correct.

7 Q. Okay. And who did you hand it to?

8 A. Jerry.

9 Q. Did you hand all six pages to him?

10 A. Yeah. They're all together.

11 Q. Okay. Did you give any instructions or an  
12 overview of the process?

13 A. Again, going back to COVID, the BMV was  
14 closed, so a lot of people had expired driver's  
15 licenses, so I made sure to ask him for a valid  
16 state-issued ID with a current address, in case he  
17 didn't, we could work through the supplemental IDs.  
18 I handed him the form. The standard first question  
19 is the only confusing one, it's asking if you're the  
20 buyer, if you're buying it for you. And if you're an  
21 American citizen, don't check the last box on the  
22 second page. If you have any questions, let me know.

23 And at that point I had his information, I  
24 looked him up in the Lucas County records, and he  
25 came back clean.



1 Q. What was Allison doing while Jerry was  
2 filling out the form?

3 A. She was standing to the left of him.

4 Q. Did you observe any glances or looks  
5 between Zohn and Allison at any point while Jerry was  
6 filling out the form?

7 A. No.

8 Q. Did Zohn or Allison ask any questions  
9 while Zohn was filling out the form?

10 A. No.

11 Q. Did Zohn or Allison say anything to each  
12 other while Zohn was filling out the form?

13 A. No.

14 Q. Were you observing Allison or Zohn's  
15 demeanor while Zohn was filling out the form?

16 A. Yes. Jerry was, literally, less than  
17 2 feet away from me.

18 Q. Okay. What do you recall observing about  
19 his demeanor while he was filling out the form?

20 A. He was taking the form just as serious as  
21 he did our conversation previous.

22 Q. How could you tell he was taking it  
23 seriously?

24 A. Because he was clearly reading every  
25 question.

1 Q. What did you do while Zohn was filling out  
2 the form? Were you just standing behind the counter?

3 A. Yes.

4 Q. Did you leave the counter at all or go  
5 anywhere while he was filling it out?

6 A. No. I was there alone.

7 Q. Roughly how long did it take Zohn to  
8 complete the form, if you recall?

9 A. Five or six minutes.

10 Q. And then did he hand it back to you?

11 A. He did.

12 Q. Did you tell him about the background  
13 check?

14 A. I don't understand the question.

15 Q. Did you tell him that you had completed a  
16 background check on him and that it came back clean?

17 A. Yeah, I -- after he handed me the form,  
18 then I did the background check, and then I told him  
19 the government liked him and would you like any  
20 ammunition with that today?

21 Q. And what did he say?

22 A. He said "How much is it?" and "Two boxes,  
23 please."

24 Q. Other than asking you how much the ammo  
25 was, did he ask any other questions?

1 A. No.

2 Q. Did he say anything else?

3 A. No.

4 Q. Okay. Did Allison say anything in  
5 response to you asking if he wanted any ammo?

6 A. No. Allison didn't speak at all the  
7 second time she was in the store.

8 Q. Okay. And what was -- Did you watch  
9 Allison's demeanor at all while Jerry was filling out  
10 the form?

11 A. Yes. She stood there smiling just like  
12 she did earlier.

13 Q. How was the gun paid for?

14 A. Cash.

15 Q. I believe that the receipt says that it  
16 was sold at 7:36 p.m. Were you open late that day?

17 A. The software in my point-of-sale system,  
18 the clock is wrong.

19 Q. Okay.

20 A. It's four hours fast.

21 Q. Okay.

22 Did Jerry Zohn hand you the cash?

23 A. Yes.

24 Q. Do you recall him reaching in his wallet  
25 or his pocket to get the cash?

1 A. I do not.

2 Q. Do you recall Allison handing Zohn cash?

3 A. She did not.

4 Q. Did the two of them talk to each other  
5 during the payment?

6 A. No. Allison never spoke in the store the  
7 second time.

8 Q. Did you ask any additional questions  
9 during the payment?

10 A. No.

11 Q. And did the two of them leave together?

12 A. Yes.

13 Q. You were present for Mr. Zohn's  
14 deposition, correct?

15 A. Yes.

16 Q. My colleague Sean Alto took it, do you  
17 remember that?

18 A. Yes.

19 Q. And Mr. Alto asked Zohn whether Allison  
20 handled any firearms when she was in the store. Do  
21 you remember that?

22 A. Yes.

23 Q. And Zohn testified, quote: Allison  
24 handled, or she handled the one and looked at the one  
25 that she ended up buying. Do you remember that?

1 MR. BAHRET: Objection to -- objection.  
2 This is Bahret speaking. You are talking about  
3 Allison buying the gun. That's not who bought the  
4 gun.

5 Q. Do you remember Mr. Zohn testifying that  
6 Allison was handling the gun?

7 You can answer.

8 A. I remember him saying that, yes.

9 Q. Do you dispute that testimony?

10 A. Absolutely.

11 Q. Why do you dispute it?

12 A. It didn't happen.

13 Q. And do you recall Mr. Zohn testifying that  
14 Allison was talking to you about the caliber of the  
15 gun?

16 A. I do.

17 Q. Do you dispute that?

18 A. Absolutely.

19 Q. How come?

20 How come you dispute that?

21 A. It didn't happen.

22 Q. And do you recall Mr. Zohn testifying that  
23 Allison was the person primarily speaking to you?

24 A. I do.

25 Q. Do you also dispute that?

1 A. Yes, I do.

2 Q. Same answer of why you dispute that?

3 A. It didn't happen.

4 Q. Mr. Zohn also testified that Allison  
5 pointed to the gun that she wanted. Do you remember  
6 him saying that?

7 A. I do.

8 Q. Okay. Do you also dispute that?

9 A. I assume that was the gun he told her No.

10 Q. Do you recall -- Did Allison point to any  
11 other gun during the two visits?

12 A. No.

13 Q. Was she looking at different guns?

14 A. No.

15 Q. Did she walk -- she didn't walk around the  
16 store at all and look at other guns?

17 A. She never left his side. She was directly  
18 across from me the whole time.

19 Q. Do you recall Mr. Zohn testifying that  
20 Allison handled a firearm in your store?

21 A. I do.

22 Q. Do you dispute that fact?

23 A. That is not a fact. She did not handle  
24 anything.

25 Q. Do you recall Jerry Zohn testifying that

1 you witnessed Allison holding the firearm?

2 A. I do.

3 Q. Do you also dispute that?

4 A. She never handled the firearm.

5 Q. And Mr. Zohn also testified that Allison  
6 handed you money to pay for the gun. Do you remember  
7 Mr. Zohn saying that at his deposition?

8 A. I do.

9 Q. Do you dispute that that happened?

10 A. She did not hand me the money.

11 Q. All right. Last few questions here. At  
12 any time during the first visit or the second visit  
13 did you have any suspicions regarding the purchase?

14 A. None at all.

15 Q. ADCO has a website, correct?

16 A. Correct.

17 Q. Is it ADCOFirearms.com?

18 A. It is.

19 Q. Who created that website?

20 A. Define "create."

21 Q. I mean, did you have a web designer, or  
22 did you do it yourself?

23 A. I originally did it myself, but I had  
24 somebody redo the operating part of it a couple years  
25 ago.

1 Q. You have a page on your website called  
2 Legal Disclaimer.

3 A. Yes.

4 Q. Who drafted that language?

5 A. I don't remember. That's from the  
6 original website 20-some years ago.

7 Q. Okay.

8 A. The website started with the previous  
9 owner.

10 Q. So the legal disclaimer says, and I'll  
11 represent to you I'm reading what I captured from the  
12 website, "We have taken every measure to ensure that  
13 this site complies with federal law. Differing State  
14 legislation changes so rapidly and varies so much  
15 that it is impossible for us to keep current. There  
16 is no intention to sell items that are illegal in  
17 your state, but there is no possible way we can  
18 ensure that every item that we sell will be legal for  
19 you to own. It is up to you, the consumer, to ensure  
20 that the item you purchase from us is legal in your  
21 state for you to own."

22 Has that language changed since July  
23 2nd of 2020?

24 A. No.

25 Q. And that's the language that you said you



1 inherited, essentially, from the previous owner?

2 A. Yes.

3 Q. Form 4473 provides that the seller of a  
4 firearm must determine the lawfulness of the  
5 transaction. Do you agree with that?

6 A. Yes.

7 Q. Okay. So can you square ADCO's legal  
8 disclaimer with the Form 4473 language?

9 A. I don't sell firearms on my website.

10 Q. But my question is that your website says  
11 that there is no possible -- it says, "It is up to  
12 you, the consumer, to ensure that the item you  
13 purchase from us is legal in your state for you to  
14 own," and that "there is no possible way to ensure  
15 that every item we sell will be legal for you to  
16 own." Okay?

17 A. Okay.

18 Q. And so my question is if you agree that  
19 federal law requires you as the seller of a firearm  
20 to determine the lawfulness of the transaction, would  
21 you say that that website disclaimer is incorrect?

22 A. No, not at all. The website says "item,"  
23 not "firearm." I don't sell firearms through my  
24 website.

25 Q. So is your understanding that the legal

1 disclaimer is not referring to firearms that may be  
2 purchased at your store?

3 A. That's why it says "in your state."

4 Q. Okay. So it's only referring to online  
5 transactions.

6 A. Of accessories; correct.

7 Q. Okay. Fair enough.

8 MS. WEAVER: All right. Let me take five  
9 minutes off the record to look over my notes and then  
10 we'll wrap up.

11 THE VIDEOGRAPHER: Off the record, 3:14.

12 (Recess taken.)

13 THE VIDEOGRAPHER: We're back on the  
14 record, 3:17.

15 Q. (By Ms. Weaver) Mr. Thompson, have you  
16 told me in your deposition today everything that you  
17 remember from the two times that Allison and Jerry  
18 were in your store on July 2nd, 2020?

19 A. Yes.

20 Q. Okay. You're not going to come up with  
21 any new details or anything at trial down the line?

22 A. No.

23 Q. And is there anything else that you would  
24 like to tell me today that we haven't discussed yet?

25 A. No.

1 MS. WEAVER: Okay. I don't have anything  
2 further. Thank you for your time.

3 MR. BAHRET: Off the record.

4 THE VIDEOGRAPHER: Okay. We're off the  
5 record, 3:18.

6 (Whereupon, at 3:18 p.m., the deposition  
7 was concluded and signature was not waived.)

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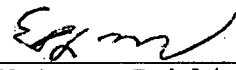
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State of Ohio )  
County of Lucas ) SS:

I, STEVEN E. THOMPSON, do hereby certify that I have read the foregoing transcript of my testimony given on Friday, August 4, 2023; that together with the correction page attached hereto noting changes in form or substance, if any, it is true and correct.

  
\_\_\_\_\_  
STEVEN E. THOMPSON

I do hereby certify that the foregoing transcript of the deposition of STEVEN E. THOMPSON was submitted to the witness for reading and signing; that after he had stated to the undersigned Notary Public that he had read and examined his testimony, he signed the same in my presence on the 21 day of August, 2023.

  
\_\_\_\_\_  
Notary Public

My commission expires 8-17, 24.

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**EDWARD J. MCKINNEY**  
Notary Public, State of Ohio  
Commission No. 2019-RE-793466  
My Commission Expires  
August 17, 2024

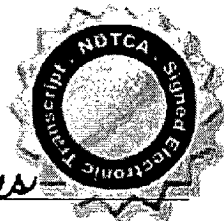
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CERTIFICATE

State of Ohio )  
 ) SS:  
County of Delaware )

I, Maria DiPaolo Jones, RDR and CRR, the undersigned, a duly qualified and commissioned notary public within and for the State of Ohio, do certify that, before giving his deposition, STEVEN E. THOMPSON was by me first duly sworn to testify to the truth, the whole truth, and nothing but the truth; that the foregoing is the deposition given at said time and place by STEVEN E. THOMPSON; that I am neither a relative of nor employee of any of the parties or their counsel and have no interest whatever in the result of the action.

IN WITNESS WHEREOF, I hereunto set my hand and official seal of office on this 15th day of August, 2023.



*Maria DiPaolo Jones*  
Maria DiPaolo Jones,  
Registered Diplomate Reporter,  
Certified Realtime Reporter,  
and Ohio Notary Public

My commission expires: June 19, 2026.

(33640-MDJ)

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