

STATE OF OHIO )  
 ) SS.  
COUNTY OF LUCAS )

COURT OF COMMON PLEAS

ESTATE OF ALLISON ROEBKE, )  
 )  
 Plaintiff, )  
 vs. ) Case No. G-4801-CI-  
 ) 0202202926  
 ADCO FIREARMS, et al., ) Judge Navarre  
 )  
 Defendants. )

- - -

VIDEO DEPOSITION  
OF  
JERRY L. ZOHN

TAKEN AT: Merritt House  
4645 Lewis Avenue  
Toledo, Ohio 43612  
DATE: Monday, December 19, 2022  
TIME: 11:20 a.m.  
REPORTER: Teri Genovese Mauro, RPR

- - -

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2024 JAN -3 PM 12:40  
COMMON PLEAS COURT  
JERRY L. ZOHN  
DEPOSITION

C

I N D E X

DEPOSITION OF JERRY L. ZOHN

<u>Examination</u>	<u>Page</u>
By Mr. Alto	3
By Mr. Bahret	50
By Mr. Johnson	60
By Mr. Alto	79
By Mr. Bahret	80
- - - -	
<u>Plaintiff's Exhibits</u>	
2	30
3	42
4	46
- - - -	
<u>Objections</u>	
By Mr. Alto	58
By Mr. Alto	58
- - - -	

1 **APPEARANCES:**

2 On behalf of the Plaintiff:

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15 By: **D. LEE JOHNSON**

16 **ALSO PRESENT:** John Adkins, Video Graphics  
17 Steve Thompson

18 - - -

19 JERRY L. ZOHN,

20 was by me first duly sworn, hereinafter certified,  
21 testified and said as follows:

22 - - -

23 EXAMINATION

24 BY MR. ALTO:

25 Q Morning, Mr. Zohn, my name is Sean Alto.  
I'm an attorney. I represent the Estate of Allison  
Roebke. Okay. We're here today to ask you a couple  
of questions. If at any time you don't understand  
the questions, will you please let us know?

A Yes.

1           Q     And could you also, please -- yeah, just  
2 make sure your answers are verbal. There's no key  
3 on the court reporter's machine for a head shake or  
4 head nod. Okay?

5           A     Okay.

6           Q     Okay. Have you ever given a deposition  
7 before?

8           A     Yes. But I don't remember what for, and  
9 it wasn't that -- it was probably about two or three  
10 years ago.

11          Q     Okay. Do you have any recollection of any  
12 of the details about why you gave a deposition?

13          A     No. I'm just trying to remember what it  
14 was for.

15          Q     Okay. If you don't understand one of my  
16 questions or one of these other attorneys'  
17 questions, will you please let us know?

18          A     Uh-huh. Yes, I will.

19          Q     Thank you. If you need a break at any  
20 time, just let us know. This isn't a marathon or  
21 anything like that. If you need a break, we're  
22 happy to take one. We just ask that you answer a  
23 question before we take a break. Okay?

24          A     Okay.

25          Q     Great. Did you do anything to prepare for

1 your deposition today?

2 A No.

3 Q Did you talk to anybody, say, hey, I'm  
4 giving a deposition?

5 A No.

6 Q Did you review any documents?

7 A No.

8 Q Okay. I understand you have been  
9 diagnosed with Parkinson's disease; is that correct?

10 A Yes, it is.

11 Q Okay. When were you diagnosed?

12 A May 20th, 19 -- 2015.

13 Q 2015?

14 A Yeah.

15 Q To the best of your knowledge, will that  
16 affect your ability to tell the truth today?

17 A No.

18 Q Do you have any other medical conditions  
19 that, to your knowledge, will affect your ability to  
20 tell the truth?

21 A Type 2 diabetes and blood pressure, I  
22 guess.

23 Q Hypertension?

24 A Yeah.

25 Q Will either of those affect your ability

1 to tell the truth today?

2 A No.

3 Q Okay. Have you been diagnosed with any  
4 sort of memory loss disorder, like dementia or  
5 Alzheimer's?

6 A No.

7 Q Are you taking any medications for  
8 Parkinson's, Type 2 diabetes, or hypertension that  
9 would affect your ability to truthfully answer  
10 questions today?

11 A Not that I know of.

12 Q Okay. Briefly could you just tell us  
13 about your educational background. I understand you  
14 went to college?

15 A Yes.

16 Q Where did you go?

17 A University of Toledo.

18 Q Okay. Did you graduate?

19 A I got a degree in social work and a degree  
20 in respiratory care.

21 Q Any education beyond that, formal  
22 education?

23 A No.

24 Q Okay. And just briefly, could you give a  
25 synopsis of your work background?

1           A     I -- well, before I retired from the  
2 University of Toledo, I worked at the medical center  
3 there as a respiratory therapist. I did adult and  
4 pediatric critical care.

5           Q     How long did you work there?

6           A     About 20 -- 20 years.

7           Q     Okay. Did you ultimately retire?

8           A     Yeah.

9           Q     When did you retire?

10          A     On July 15th of '15.

11          Q     2015?

12          A     Yeah.

13          Q     Thank you. Let's switch gears a little  
14 bit. Prior to July 2nd of 2020, okay, did you have  
15 any experience with firearms?

16          A     When I was a kid, but nothing -- no.

17          Q     Had you ever purchased a firearm prior to  
18 July 2nd --

19          A     No.

20          Q     -- 2020?

21          A     No.

22          Q     And you said a moment ago you had some  
23 experience with firearms as a -- as a child?

24          A     Yeah. Just target shooting.

25          Q     Okay. What kind of firearms?

1           A     I couldn't tell you.

2           Q     Okay. Do you remember if they were  
3 pistols or long rifles?

4           A     Long rifle.

5           Q     Okay. To the best of your knowledge, when  
6 was the last time prior to July 2nd of 2020 that you  
7 held a firearm?

8           A     Couldn't tell you that either. It's been  
9 a long, long time.

10          Q     When did you first meet Allison Roebke?

11          A     Can't tell you the date, but it was at  
12 Secor Park.

13          Q     That's here in Toledo?

14          A     Yeah.

15          Q     Is it on Central Avenue?

16          A     Right.

17          Q     Could you tell us what you remember about  
18 that first meeting at Secor Park.

19          A     I remember that I was sitting in my car  
20 reading, because that's the most that I could really  
21 do without worrying about falling on my face, and  
22 she -- I saw her get out of her car and kind of walk  
23 toward me, and she looked very sad, very sad.

24                     And, you know, I talked to her just for a  
25 brief moment. And that's basically what I remember



1 about the first meeting.

2 Q Okay. Do you remember telling the police  
3 that she had a terrible worried upset look on her  
4 face?

5 A Yes.

6 Q And it looked like she was about to cry?

7 A Yes.

8 Q Okay. Sorry. I didn't mean -- were you  
9 going to say something?

10 A No.

11 Q Okay. Did you notice anything about her  
12 mannerisms, how she was acting?

13 A Nothing unusual that I could tell.

14 Q Okay. How long did that first interaction  
15 last?

16 A Five minutes or so.

17 Q My understanding is after that, you two  
18 developed a sort of friendship; is that fair?

19 A Right.

20 Q Could you tell us about that friendship.

21 A There was nothing more than, you know,  
22 I -- I felt bad for her, and I tried to help her out  
23 as much as I could.

24 Q What do you mean help her out?

25 A Well, I mean, you know, we went for short

1 rides and things like that and stopped and got  
2 things to eat, you know, very, very loose, social.

3 Q Did you ever talk to Allison about any  
4 sort of mental health trouble she may have had in  
5 the past?

6 A I know that she suffered from -- I knew  
7 that she heard voices, and I tried to talk her  
8 through that as much as possible. I tried to have  
9 her talk to her psychiatrist, and with that, she --  
10 and she said that she'd had -- and this is right  
11 during the first of COVID, you know, and so nobody  
12 was really doing anything, you know, hour -- hourly.  
13 That's about it, you know.

14 Q Okay. Did she ever tell you what any --  
15 the details about the voices she was hearing?

16 A She told me that they were from people  
17 that -- that she had knew from someplace that she  
18 had lived outside of -- outside of -- you know,  
19 outside of with her parents.

20 Q Say it again. Sorry.

21 A Outside of with her parents.

22 Q Okay. Do you remember anything else about  
23 the conversations you had with Allison Roebke about  
24 her mental health struggles?

25 A No. Just that they were -- I thought they

1 were severe, you know.

2 Q Why did you -- why did you think that?

3 A Just because of the way she sounded, and,  
4 I mean, most people that you talk to don't complain  
5 about hearing voices.

6 Q Did she ever express to you any thoughts  
7 of self harm?

8 A No.

9 Q Did she ever share with you any sort of  
10 medical diagnosis she had received?

11 A I don't think so.

12 Q Related specifically to any mental health  
13 issues?

14 A Not -- not really that now I can relate to  
15 you.

16 Q Okay. You used to take her to her  
17 doctors' appointments; is that right?

18 A Yeah, once in a while. I mean, she had  
19 other doctors' appointments. I just -- I think I  
20 took her to a couple at Cleveland Clinic -- not  
21 Cleveland Clinic -- Toledo Clinic.

22 Q Do you remember what those appointments  
23 were for?

24 A No.

25 Q Okay. Did she ever tell you any sort of

1 medication she was taking?

2 A I don't believe so.

3 Q Did she tell you how long the voices that  
4 she was hearing, how long she had been hearing  
5 those?

6 A No. If she did, it was in passing and I  
7 didn't -- I don't remember.

8 Q Okay. Would you agree that even just upon  
9 the first time you met her that you thought there  
10 was something -- something going on with her mental  
11 stability?

12 A She seemed to be fairly normal functioning  
13 so I didn't think a whole lot of it. She didn't  
14 really -- I mean, she told me about depression. I  
15 mean, not -- not in detail, but, you know.

16 Q She told you she had depression?

17 A She -- I don't know if she -- she --  
18 excuse me. I don't know if she used that term or  
19 not, but I could tell that she was.

20 Q And what did -- why did you believe she  
21 was depressed?

22 A Just because she -- the way she acted.

23 Q And what was it about the way she acted?

24 A She acted depressed. I mean, I -- I've  
25 got some experience with depression because my wife

1 is clin -- clinically depressed or she still is, I  
2 guess. And I've got a child who is also, so, you  
3 know, I -- I could see.

4 Q Could you tell us what you saw that made  
5 you believe she was feeling depressed?

6 A Just what she said. I mean, you know, I  
7 can't repeat anything, because I don't know. I  
8 don't remember.

9 Q Understood. Did you ever meet Allison --  
10 either of Allison's parents?

11 A I met her mother briefly. I went to  
12 Allison's house to pick her up, and her mother came  
13 out and we met and talked for maybe 30 seconds or a  
14 minute and never met her father.

15 Q Do you remember anything about that  
16 conversation?

17 A No. Just very, you know, superficial.

18 Q Okay. So do you remember when it was  
19 generally, even a month, when you first met Allison?

20 A You mean like in July or something like  
21 that?

22 Q Well, so my understanding is you purchased  
23 the firearm in July -- on July 2nd, 2020; is that  
24 right?

25 A Could have been. I don't remember.

1 Q Okay. If that -- if that's what the  
2 police report says --

3 A Then I'll --

4 Q -- does that sound right to you?

5 A Yeah.

6 Q Okay. And I think you indicated that you  
7 maybe met her several months before that?

8 A Oh, yeah. Yeah.

9 Q Does that sound right to you?

10 A Yeah.

11 Q Okay. So that would have been maybe in  
12 the May 2020 time frame?

13 A Yeah.

14 Q Okay. You indicated, I think earlier,  
15 that you used to go out to lunch together?

16 A A couple times.

17 Q Where would you go?

18 A Wherever we went. One time we went to a  
19 place in Franklin Park.

20 Q Do you remember the name of the  
21 restaurant?

22 A No. Probably isn't there any more  
23 anyways.

24 Q Okay. What did you two talk about?

25 A Just whatever.

1 Q Can you tell me anything -- anything you  
2 remember about those conversations?

3 A I really -- I -- honestly, I don't. It's  
4 been a while and, you know --

5 Q You also went on some -- an overnight trip  
6 at some point?

7 A One time.

8 Q Can you tell me what you remember about  
9 that.

10 A She didn't want to go home. She wanted to  
11 go further, you know, just for a longer ride. Let's  
12 see, we went down to -- I'm thinking it was almost  
13 Lima.

14 Q What was the purpose of that visit?

15 A No particular purpose.

16 Q Do you know why she didn't want to go  
17 home?

18 A I don't know. She just didn't want to be  
19 at home.

20 Q Do you recall going to a Comfort Inn?

21 A Probably that was what it was.

22 Q Okay. And you spent the night there; is  
23 that right?

24 A Right.

25 Q Okay. And why did you spend the night

1 versus coming home?

2 A Because she didn't want to go home.

3 Q Okay. Can you tell me what you remember  
4 from that evening?

5 A Not much. I mean, she just -- I remember  
6 she cried a lot.

7 Q Did she tell you why she was crying?

8 A No. I mean, probably she was sad. I  
9 don't know.

10 Q Was she acting depressed?

11 A She -- I -- I was -- I would assume that  
12 since she was crying she wasn't real thrilled.

13 Q Do you remember her in the evening while  
14 she slept moaning or making noises in the middle of  
15 the night?

16 A She -- no. She did cry.

17 Q Okay.

18 A And, you know, I don't remember a whole  
19 lot else.

20 Q Did you ask her why she was crying?

21 A It was obvious to me at the time that she  
22 was crying because she was not happy. But, you  
23 know, I don't think she wanted to be home.

24 Q Did you have an understanding why she was  
25 not happy?



1 A (Witness shook head.)

2 Q Is that a no?

3 A Yeah, that's -- I'm sorry.

4 Q Sorry. I just want to make sure for the  
5 court reporter.

6 A Yeah.

7 Q Did she ever tell you that the voices told  
8 her that she was in trouble?

9 A I don't remember her saying that, no.

10 Q Okay. Any other visits or meetings with  
11 her that you remember any details at all about?

12 A Not really. Most of them were, you know,  
13 fairly casual.

14 Q Okay. At some point Allison asked you to  
15 purchase a firearm for her; is that right?

16 A Yes. She said she was not allowed to  
17 because she had been in a mental institution. And I  
18 just thought that -- I mean, I -- I believed her,  
19 but I just -- I just figured that she was just  
20 talking about, you know, that she couldn't do it.  
21 And she -- oh, she said she wanted to do it -- shoot  
22 targets like she used to do with her cousin. So she  
23 never mentioned anything about harming herself or  
24 anything like that.

25 Q Understood. What do you remember about

1 Allison asking you to purchase her a firearm?

2 A I remember telling her, I said, well,  
3 you're not going to do anything stupid with it, are  
4 you. And she says, no. I was referring to  
5 obviously harming herself or, you know, robbing a  
6 bank or something like that. She said, no, I just  
7 want to, you know, shoot targets like I used to do  
8 with my cousin. I said, okay.

9 Q And do you recall whether she asked you --  
10 was that in person, over the telephone, via text  
11 message, something else?

12 A I believe it was in person.

13 Q Okay. Where were you?

14 A Probably in the car.

15 Q Okay. Where? Where were you in the car?  
16 Where was the car at?

17 A I don't know exactly where the car was but  
18 I was -- I was driving.

19 Q Okay. Was that -- for purposes of the  
20 conversation, my understanding is the firearm was  
21 purchased on July 2nd.

22 A (Witness nodded.)

23 Q Was the conversation you're describing on  
24 July 2nd?

25 A It might have been before that or just

1 before that.

2 Q Okay. So can you tell me about any time  
3 you and Allison went to a gun store?

4 A It was that day we -- we bought it, and  
5 then we went to another one somewhere down the --  
6 down the road. We went up to -- oh, that place up  
7 in --

8 Q Was it in Lambertville?

9 A Yeah, there was a place in Lambertville.

10 Q Did you go to a gun store in Lambertville  
11 with Allison Roebke?

12 A Yeah.

13 Q Do you remember the name of the gun store?

14 A No.

15 Q Was it Todd's Guns?

16 A That, I can't tell you.

17 Q Don't remember. Okay. Did you go to a  
18 gun store with Allison Roebke, any gun store, prior  
19 to the day you purchased a firearm from ADCO?

20 A Yeah. But I'm not sure exactly how long  
21 before. It was just, you know, within a few days  
22 before.

23 Q Okay. Was that the store in Michigan?

24 A Yeah. What the heck's the name of it?  
25 It's a big, big store up there.

1 Q The Cabela's?

2 A Yeah.

3 Q The Cabela's up in Michigan?

4 A Uh-huh.

5 Q Is that right?

6 A Yes.

7 Q Okay. What do you remember about that  
8 visit?

9 A Not a whole lot.

10 Q Okay. Did you and Allison go in together?

11 A Yeah.

12 Q Okay. Did you talk to Allison in the  
13 store about which firearm she wanted you to  
14 purchase?

15 A No, because she didn't see anything there  
16 that she wanted.

17 Q Okay. Did you look at any specific  
18 firearms?

19 A I don't think so.

20 Q Okay. And do you remember anything else  
21 about going into that Cabela's with Allison prior to  
22 July 2nd?

23 A Huh-uh.

24 Q No?

25 A No.

1 Q Okay. Do you recall any details at all  
2 about how Allison was acting in the -- in the  
3 Cabela's?

4 A For Allison, she was acting just fine.

5 Q What do you mean "for Allison"?

6 A Well, I mean, she was -- she wasn't  
7 jumping up and down and she wasn't ecstatic. She,  
8 you know, wasn't real excited.

9 Q Was she acting in a similar way to the way  
10 that you saw her your first meeting at Central -- at  
11 Secor Park?

12 A No. She was more relaxed than that.

13 Q Do you understand -- do you have any  
14 understanding of why she was more relaxed in that  
15 setting?

16 A Probably because we were more familiar  
17 with each other.

18 Q Oh, you had -- you had built some sort of  
19 relationship --

20 A Yeah.

21 Q -- over that period of time?

22 A Yeah.

23 Q Yes?

24 A Uh-huh. Yes.

25 Q Sorry. I just want to make sure --

1           A     It's okay.

2           Q     -- we get a yes or a no.  I don't mean to  
3 be rude to keep reminding you.

4           A     That's okay.

5           Q     Did you or Allison try to purchase  
6 anything from Cabela's?

7           A     No.

8           Q     Why not?

9           A     Well, I wasn't there for anything, number  
10 one.  Number two, she didn't -- you know, she didn't  
11 see anything she wanted and --

12          Q     When was the first time you went to ADCO  
13 Firearms?

14          A     When was the first time?  I'm going to say  
15 if we made the purchase on the 2nd of July, it was  
16 probably the very end of June.

17          Q     End of June 2020?

18          A     Yeah.

19          Q     What do you remember from that visit?

20          A     Not a whole lot.  We just went in there --  
21 to ADCO, you're talking about?

22          Q     I am.

23          A     Went in there and she looked at a few guns  
24 and that was about it.  I had some questions just,  
25 you know, standard questions about guns that I

1 didn't understand or know, so that was -- you know,  
2 there was nothing -- nothing really too revealing  
3 about that conversation.

4 Q When you said you had some questions, who  
5 were you asking those questions of?

6 A The gun guy.

7 Q And when you said "the gun guy," do you  
8 remember who that was?

9 A No.

10 Q Was it -- and I'm going to represent to  
11 you that the owner, as I understand it, at ADCO is  
12 sitting across from me, Mr. Thompson. Was it the  
13 gentleman sitting across the table from me?

14 A I don't believe so.

15 Q Okay. So it was a different employee of  
16 ADCO Firearms?

17 A Could have been.

18 Q Okay. How was Allison acting when she was  
19 in ADCO at the end of June?

20 A Okay. I mean, as -- as normal as she ever  
21 acted.

22 Q Okay. Similar to the way she was acting  
23 at Cabela's?

24 A Yeah.

25 Q Did she look at any firearms? Did she

1 handle any firearms when she was in there?

2 A Yeah, she did. She handled the one and  
3 looked at the one that she ended up bought --  
4 buying.

5 Q Which one was that; do you remember?

6 A No. I know it was a revolver.

7 Q A Ruger .22 revolver?

8 A Could have been?

9 Q Okay.

10 A Yeah. That's --

11 Q Whatever -- if the police report  
12 identifies it as a .22 revolver, does that sound  
13 right to you?

14 A Yeah.

15 Q Okay. Do you recall her asking any  
16 questions of the employee as she handled the  
17 firearm?

18 A No. I mean, she may have, but, you know,  
19 they're in one ear and out the other.

20 Q Do you recall any of the questions that  
21 you asked the employee?

22 A No.

23 Q I'm assuming -- any chance you remember  
24 the employee's name?

25 A No.



1 Q Do you recall how many employees were in  
2 the store that day?

3 A Just the one.

4 Q Just the one. A man or woman?

5 A Male.

6 Q Can you describe the person for me?

7 A Well, wasn't real tall.

8 Q Wasn't real tall?

9 A No. And he wasn't real short. So I guess  
10 he --

11 Q Medium height?

12 A Yeah.

13 Q Okay.

14 A About that.

15 Q Okay. White man? Black man?

16 A White.

17 Q Something else?

18 White man, okay. Do you remember what  
19 color hair they had?

20 A I think it was dark, but I'm not sure.

21 Q Okay. Any facial hair?

22 A I didn't pay any attention.

23 Q Did you or Allison try to purchase  
24 anything from ADCO during that first visit in June  
25 of 2020?

1           A     I don't think so, no.

2           Q     And why not?

3           A     I don't know that -- I don't know. I  
4 didn't know at the time and I still don't know if  
5 she had found what she wanted and, you know, just  
6 all -- you know, just nothing meant anything to me.

7           Q     What do you mean?

8           A     Well, nothing was pertinent to anything,  
9 you know. I'm -- I don't know how else to explain  
10 it.

11          Q     Okay. Between that visit at the end of  
12 June of 2020 and July 2nd when you purchased the  
13 firearm -- firearm was purchased, did you and  
14 Allison talk about what type of gun she wanted?

15          A     No, I don't think so. There might have  
16 been some mention, although this could -- this --  
17 this just could be coming out of my head that she  
18 wanted something, you know, a little bit bigger.  
19 And I don't remember how the discussion went;  
20 although, I -- you know, I knew very little about  
21 guns at that time. I still don't know a whole lot.  
22 So --

23          Q     When you say "a little bit bigger," do you  
24 mean bigger caliber?

25          A     Bigger caliber.

1 Q Okay.

2 A Yeah.

3 Q So let's talk about -- well, let's' back  
4 up. Between your visit to ADCO in June of 2020 and  
5 July 2nd, did you visit any other gun stores  
6 including ADCO during that time frame?

7 A Just the one -- well, other than Cabela's,  
8 just there was one on -- it's just up in Michigan.

9 Q Also up in Michigan?

10 A Yeah.

11 Q Okay.

12 A And I know there's -- oh, and I remember a  
13 guy there saying that he didn't have a whole lot in  
14 stock because -- you know, I don't remember exactly  
15 why. I guess I wasn't paying attention to that.

16 Q So I just want to make sure I understand I  
17 have the timeline of events. You and Allison went  
18 to a Cabela's in Michigan at some point before you  
19 ever went to ADCO; is that right?

20 A No. We went to ADCO first.

21 Q Okay. So you went to ADCO first in June  
22 of 2020 --

23 A Uh-huh.

24 Q -- is that right?

25 A Yeah.

1 Q And then after that, sometime before  
2 July 2nd, you went to Cabela's?

3 A Right.

4 Q After that, did you go to any other gun  
5 stores including ADCO before you purchased the gun  
6 on July 2nd?

7 A No, just that -- there was one up on -- I  
8 want to say --

9 Q Another store in Michigan you said?

10 A Yeah.

11 Q Okay.

12 A It wasn't that far up. It was off of  
13 Secor.

14 Q Secor is the name of a road?

15 A Uh-huh.

16 Q It's also the name of the park?

17 A Yeah. Was it Secor?

18 Q Okay. So let me try it again to make sure  
19 I understand it. The first gun store you and  
20 Allison visited was ADCO in June of 2020?

21 A Correct.

22 Q Towards the end of 20 -- of June?

23 A Yeah.

24 Q Then you went to Cabela's?

25 A Yeah.

1 Q And then you went to a different gun  
2 store?

3 A Different gun store was before Cabela's  
4 after the first ADCO.

5 Q Okay. So ADCO was first. A different gun  
6 store in Michigan that's not Cabela's?

7 A Right.

8 Q Then you went to Cabela's?

9 A Right.

10 Q And then you went to ADCO --

11 A Correct.

12 Q -- on July 2nd of --

13 A Yeah.

14 Q -- 2020?

15 Thank you. If you remember the name of  
16 the other gun store that you went to, just -- any  
17 time, just let me know. Okay?

18 A Okay. I will.

19 Q And it wasn't -- was that Todd's Guns in  
20 Lambertville?

21 A (Witness shrugged.)

22 Q You're not sure.

23 Okay. Let's talk about July 2nd. Okay?

24 What do you remember from that day, from the  
25 beginning of the day?

1           A     Just that we went there. She -- she had  
2 gotten some money from the bank to purchase the gun  
3 with, because I didn't have any money, and I -- you  
4 know, I didn't feel that I should be the one buying  
5 the gun if she wanted it. And that's about it.

6           Q     Okay. Did you remember a text message  
7 that Allison sent you that morning or that afternoon  
8 asking you about purchasing a firearm?

9           A     I don't remember what -- not to say that  
10 it --

11          Q     Sure.

12          A     -- didn't happen.

13          Q     No, I understand. It's been a while.

14                   MR. ALTO: We'll mark this as  
15 Plaintiff's Exhibit 2. I'm going to hand  
16 that -- it's a copy of the police report.

17                   (Whereupon, Plaintiff's Exhibit 2 was  
18 marked for identification.)

19          Q     Feel free to take a look at the entire --  
20 entirety, Mr. Zohn. I'm not trying to trick you.  
21 My questions right now are going to focus on the  
22 fourth page. There's a collection -- it's what look  
23 like text messages. Just let me know whenever  
24 you're ready.

25                   MR. BAHRET: Is the restroom that you

1 use in this hallway?

2 MR. ALTO: No, it's somewhere else.

3 MR. BAHRET: Oh.

4 MR. ALTO: You want to take a quick  
5 break, Bob?

6 MR. BAHRET: I might have to in a  
7 minute.

8 MR. ALTO: Why don't we just take a  
9 break while he's reviewing that.

10 MR. BAHRET: Okay.

11 VIDEOGRAPHER: We're off record.

12 (Whereupon, a recess was taken at  
13 11:51 a.m. and resumed at 11:54 a.m.)

14 VIDEOGRAPHER: We're back on record  
15 now.

16 BY MR. ALTO:

17 Q All right. Mr. Zohn, have you had a  
18 chance to take a look at the document I handed you?

19 A Yes.

20 Q Okay. Did you see the text message  
21 exchange that I believe came from your cell phone on  
22 the fourth page? Right there in front of you there.

23 A Yeah.

24 Q In the middle of the page down and then on  
25 to the second -- next page. Do you recall that

1 exchange?

2 A Not word for word, but I do understand. I  
3 do remember.

4 Q Okay. So it appears that around 1:12 in  
5 the afternoon on July 2nd, Allison asked you to  
6 purchase a pistol for her; is that right?

7 A Correct.

8 Q Okay. And there's an exchange about --  
9 back and forth about meeting. Do you ultimately  
10 meet her?

11 A Yeah. Well -- well, the time -- I went to  
12 the Secor Park every morning to read, and then she'd  
13 show up.

14 Q Okay. And did she show up that day?

15 A Apparently.

16 Q Okay. And do you recall going to the gun  
17 store with Allison, to ADCO?

18 A Yeah.

19 Q Okay. Did you drive there together?

20 A Yeah.

21 Q Okay. Do you remember what time you and  
22 Allison arrived at ADCO?

23 A No. It was early afternoon.

24 Q Sometime after the -- that first set of  
25 exchange messages from 1:12 to 1:46; is that right?



1           A     Yeah.

2           Q     Okay.  Do you recall where you parked when  
3 you got there?

4           A     At ADCO?  In front of the store.

5           Q     In front of the store.

6           A     There's --

7           Q     Okay.

8                         (Request from reporter to repeat  
9                         testimony.)

10          A     There's not a whole lot of -- you know,  
11 there's a larger lot on the side, but I think I  
12 parked right in front of the store.

13          Q     Okay.  Did you drive your car?

14          A     (Witness nodded.)

15          Q     Okay.  When you got there, did you and  
16 Allison spend any time in the car talking before you  
17 went in?

18          A     Not that I remember.

19          Q     Okay.  And did you walk in the store  
20 together?

21          A     Yeah, for all practical reas -- purposes,  
22 yeah.

23          Q     Okay.  And then when you walked in, who  
24 else was in the store?

25          A     Just Allison, myself, and the clerk.

1           Q     Clerk.  And do you recall whether the  
2 clerk or the person in the store was the person  
3 sitting across from me?  This way, not -- sorry to  
4 point but --

5           A     No.

6           Q     Okay.  Did you ever come to learn the name  
7 of that person who was in the store that day?

8           A     I might have known it then, but I don't  
9 know it now.

10          Q     Understood.  Had you ever seen the person  
11 in the store before?

12          A     (Witness shook head.)

13          Q     No?

14          A     No.

15          Q     Okay.  So it was a different person than  
16 you saw at the end of June; is that right?

17          A     I don't -- could have been, but I don't  
18 think so.

19          Q     Okay.  Can you tell me what you remember  
20 when you and Allison walked into the store?  What's  
21 the first thing that happened?

22          A     Normal greeting when you walk into any  
23 store.

24          Q     Okay.

25          A     What can I do for you.  I don't remember

1 anything particular.

2 Q Okay. Did you -- did you say anything to  
3 the person working at the desk?

4 A Other than hello, how are you, you know,  
5 no.

6 Q Okay. Do you remember anything on the  
7 walls in the store, any -- any pamphlets or signs or  
8 anything like that?

9 A Just racks of guns and things.

10 Q Racks of guns. Okay. Did you see any  
11 cameras on the -- anywhere in the store?

12 A Not that I noticed.

13 Q Okay. So you and Allison walk into the  
14 store and you say hello to the person working; is  
15 that fair?

16 A Yeah.

17 Q Okay. Can you walk me through how it is  
18 that the firearm was ultimately purchased. Who said  
19 what?

20 A I really don't know other than, you know,  
21 this is whatever it was and the caliber and -- you  
22 know.

23 Q And who's talking? Is this you or is it  
24 Allison?

25 A It's Allison.

1 Q Okay. Allison is talking to the clerk?

2 A Yeah.

3 Q And what is she saying? Did she tell the  
4 clerk what caliber firearm that she wanted?

5 A Not that I remember.

6 Q Okay. How did the person working in the  
7 store know which firearm you and Allison were  
8 interested in?

9 A I don't know. She might have -- I mean, I  
10 wasn't interested in any of them, and -- and she --  
11 I think he got out that one or maybe a couple other  
12 ones, and, you know, this is this, and he explained  
13 what -- what he had and that was the end of it.

14 Q Who is primarily talking to the person in  
15 the store; you or Allison?

16 A Allison.

17 Q And do you recall any of the details that  
18 she provided to the person working in the store  
19 about which firearm she was looking at, what  
20 caliber, anything like that?

21 A No.

22 Q Okay. Did she simply point at a gun and  
23 say this is the one I want?

24 A Basically that's what it came down to,  
25 yes.

1 Q Going into the store, did you have any  
2 idea what gun she wanted?

3 A No.

4 Q Did she ever tell you?

5 A No.

6 Q Is it fair to say that you found out which  
7 gun she wanted when -- when it was purchased?

8 A Pretty much.

9 Q What were you doing while Allison was  
10 talking to the person working at the store?

11 A Probably looking in the case at other  
12 guns.

13 Q Okay. Did you stay in the store the  
14 entire time during the transaction?

15 A Yes.

16 Q Okay. Were you listening to the  
17 interaction between the person working at the store  
18 and Allison?

19 A No, not -- not really. I mean, I was  
20 listen -- I was hearing -- hearing it, but I wasn't  
21 really listening to it because I had no real  
22 interest in it.

23 Q Okay. Do you recall whether the person  
24 working in the store asked Allison any questions  
25 about the firearm?

1           A     I don't recall.

2           Q     So you go into the store. Allison points  
3 at a firearm that she wants. What happens after  
4 that?

5           A     She -- I don't -- nothing that I can  
6 recall.

7           Q     Okay. Well, at some point you fill out a  
8 Form 4473; is that right?

9           A     Yeah, whatever it was.

10          Q     Okay. Do you recall any other interaction  
11 between the person working at the store and Allison  
12 or yourself before you received that form?

13          A     No.

14          Q     Okay. How did the person working in the  
15 store come to give you the form if Allison's the one  
16 pointing out the firearm?

17          A     That, I can't remember off the top of my  
18 head.

19          Q     Okay. Do you recall whether the person  
20 working the store asked you and Allison who was  
21 purchasing the gun?

22          A     I don't recall that.

23          Q     Do you recall whether he asked who the gun  
24 was for?

25          A     I don't recall. I don't recall that

1 either.

2 Q Do you recall him asking what the intended  
3 purpose for the firearm was?

4 A No.

5 Q Do you recall the person working in the  
6 store asking you any questions about the  
7 relationship between you and Allison?

8 A No.

9 Q Do you remember the person working in the  
10 store asking you how you two knew each other?

11 A No.

12 Q Do you remember whether the person in the  
13 store asked if you were related?

14 A No.

15 Q Excuse me. Prior to -- scratch that.

16 At any point when you were in  
17 ADCO Firearms, did you hold the firearm that you  
18 ultimately purchased?

19 A Yes.

20 Q Okay. At what point?

21 A I don't know.

22 Q Was it after you filled out the paperwork?

23 A I don't know.

24 Q Was it when the gun had been paid for and  
25 you were leaving the store?

1 A No. It was before that.

2 Q Before that?

3 A (Witness nodded.)

4 Q Okay. Do you recall at what point in the  
5 process that was? Any of the details?

6 A No.

7 Q Okay. Did Allison handle the firearm at  
8 any point during the transaction?

9 A Yes.

10 Q Okay. And who handed her the gun?

11 A I don't know if I did or if the clerk did  
12 it.

13 Q Okay. But the clerk was there for the  
14 entire -- entirety of the transaction, fair?

15 A Yes.

16 Q Okay. The clerk physically saw Allison  
17 holding the firearm?

18 A Uh-huh.

19 Q Is that a yes?

20 A (Witness nodded.)

21 Q Sorry. You need to say yes or no, sir.

22 A Oh, sorry.

23 Q I apologize.

24 A That's okay. Yes.

25 Q Thank you. When Allison was holding the



1 gun, can you describe for me what she was doing with  
2 it?

3 A No.

4 Q Did she open the cylinder?

5 A I don't remember.

6 Q Okay. Did she point at anything?

7 A No.

8 Q Okay. Do you recall about how long she  
9 held the firearm?

10 A A minute.

11 Q Okay. What were you doing during that  
12 minute she was holding the firearm?

13 A Just looking in the case.

14 Q Okay. And while Allison was holding the  
15 firearm, where was the clerk?

16 A Right there.

17 Q Watching?

18 A (Witness nodded.)

19 Q Is that a yes?

20 A Yes.

21 Q Thank you. After Allison holds the gun  
22 for approximately a minute, what does she do with  
23 it?

24 A I don't know. Set it down back on the  
25 counter.

1 Q Okay. Then what happens?

2 A She -- I don't know. She says this --  
3 this will be okay.

4 Q And who did she say that to?

5 A Probably the clerk.

6 Q Okay. And what's the response?

7 A Okay.

8 Q Then what happens?

9 A I don't know.

10 Q Okay. At some point after that exchange  
11 did the clerk hand one of you paperwork to fill out?

12 A Sometime after that, yes.

13 Q Okay. And do you recall who he handed the  
14 paperwork to?

15 A Probably to me.

16 Q Okay. And do you recall what he said when  
17 he handed you the paperwork?

18 A No.

19 (Whereupon, Plaintiff's Exhibit 3 was  
20 marked for identification.)

21 Q I'm going to hand you what I marked as  
22 Plaintiff's -- you can set that to the side,  
23 Mr. Zohn. Just on this side over here so you don't  
24 walk away with it.

25 This is Plaintiff's Exhibit 3. Could you

1 please take a look at that, Mr. Zohn, and let me  
2 know once you're ready for me to ask you some  
3 questions about it. You ready?

4 A Yeah, I think so.

5 Q Okay. Do you recall filling that document  
6 out on July 2nd?

7 A I don't recall it correctly, but I'm sure  
8 I did.

9 Q Okay. Does that look like your  
10 handwriting there?

11 A Yeah.

12 Q Okay. So when the clerk -- does he pull  
13 this form out of a folder somewhere, or do you  
14 remember?

15 A No.

16 Q Okay. Do you know why he handed it to you  
17 and not to Allison?

18 A I don't remember them -- I don't -- I know  
19 that I ended up with it.

20 Q Did Allison hand you that paperwork or the  
21 clerk?

22 A I can't say.

23 Q Okay. Did you know what you were supposed  
24 to do with that form when someone handed it to you?

25 A I suppose fill it out.

1 Q Okay. Did you have any questions?

2 A It's all pretty straightforward.

3 Q Okay. Did the clerk give you any  
4 information or give you any explanation or  
5 instruction?

6 A I don't remember if he did.

7 Q Do you recall what the clerk said to you,  
8 if anything, prior to handing you that document?

9 A No.

10 Q Did you need any sort of assistance to  
11 fill out that paperwork?

12 A No.

13 Q Where was Allison while you filled it out?

14 A Probably within a couple feet.

15 Q Was she helping you as you filled it out?

16 A No. No.

17 Q Okay. Do you recall what the clerk was  
18 doing as you filled out that form?

19 A No.

20 Q Okay. Now, I don't think it's a secret  
21 that as it relates to Question 11a you lied on this  
22 form; is that right? About who the actual buyer of  
23 the firearm was?

24 A No.

25 Q You didn't lie?

1           A     No.  I -- as far as I know, that's what --

2           Q     Why did you mark yes in that box?

3           A     I don't know.  But I know that I was  
4 arrested and, you know, found guilty of the straw  
5 purp -- purchase.

6           Q     Understand.  Were you truthful in the  
7 remainder of the form?

8           A     Yes.

9           Q     What did you do with the form after you  
10 filled it out?

11          A     I must have handed it back to the clerk.

12          Q     Okay.  And what happened after you handed  
13 it back to the clerk?

14          A     I don't know.

15          Q     Okay.  Well, at some point someone gave  
16 money to the clerk to pay for the gun?

17          A     Yes.

18          Q     Who gave money to the clerk?

19          A     Allison.

20          Q     How much money did she give him?

21          A     I don't know, whatever it was.

22          Q     Okay.  I'm going to hand you what's marked  
23 as Plaintiff's Exhibit 4.

24                         (Whereupon, Plaintiff's Exhibit 4 was  
25                         marked for identification.)

1 Q There you go.

2 A Thank you.

3 Q Did you receive a copy of a receipt or did  
4 Allison receive a copy of a receipt after paying for  
5 the firearm?

6 A Probably.

7 Q Have you seen this before, Exhibit 4?

8 A I don't know.

9 Q Okay. Do you recall whether Allison  
10 purchased anything else along with the firearm?

11 A Just the box of ammunition.

12 Q Looks like two boxes of --

13 A Yeah, two boxes.

14 Q Two 50-round boxes?

15 A Right.

16 Q Do you recall who told the clerk that they  
17 also needed to purchase ammunition along with the  
18 firearm?

19 A (Witness shook head.)

20 Q No?

21 A No.

22 Q Sorry.

23 A No.

24 Q I apologize. I just want to make sure we  
25 get a clean record.

1           A       That's okay. My voice is soft because of  
2 Parkinson's.

3           Q       If you need a break at any point, just let  
4 us know. Okay?

5           A       I'm fine.

6           Q       Okay. So you fill out the form that we  
7 looked at a second ago, Exhibit 3. How long after  
8 you filled out that form is the transaction complete  
9 and the clerk hands the gun over?

10          A       It's a short time. Minutes.

11          Q       Who did the clerk hand the gun to?

12          A       I don't remember.

13          Q       Who did the clerk hand the ammunition to?

14          A       Probably the same person.

15          Q       Okay. But you're not -- you don't  
16 remember who that was?

17          A       No.

18          Q       Okay. At the top of the receipt there in  
19 front of you, it said that payment was made via cash  
20 on July 2nd, 2020, at 7:36 p.m. Do you -- is that  
21 accurate?

22          A       I don't know if the time is accurate.

23          Q       Okay.

24          A       I would -- I would have said more was --  
25 well, it was still light out. This is in the middle

1 of July, so it could have been. Seemed to me it  
2 wasn't quite that late.

3 Q Do you recall what time it was?

4 A No.

5 Q When Allison handed the clerk the cash,  
6 the clerk say anything?

7 A No.

8 Q Did the clerk ask any questions?

9 A Not that I remember.

10 Q Did Allison have exact change? Did she  
11 have \$171.60 exactly, or did she hand some other  
12 denomination over?

13 A I don't know.

14 Q Do you recall the clerk giving Allison  
15 change back?

16 A No.

17 Q Okay. Who was holding the gun as you  
18 walked out of the store?

19 A I don't know if I grabbed the bag or if --  
20 if she did or what.

21 Q Okay. As you left the store, what did you  
22 do?

23 A Got in the car.

24 Q And you left?

25 A Yeah.



1 Q Is that --

2 A Yes.

3 Q Okay. And where did you go?

4 A I don't remember.

5 Q Do you remember any other conversations  
6 you had with Allison after July 2nd prior to her  
7 passing?

8 A (Witness shook head.)

9 Q Is that a no? You're shaking your head  
10 no, but I want to make sure.

11 A I'm sorry. No, I do not.

12 Q Okay. Did you ever talk to Allison about  
13 the gun after July 2nd when you left the store?

14 A I don't think I did.

15 Q Okay.

16 MR. ALTO: Let's take -- we can go  
17 off the record for just a moment. I'd  
18 like to flip back through my notes and  
19 I'll hand it over to you guys.

20 VIDEOGRAPHER: We're off record.

21 (Whereupon, a discussion was held off  
22 the record.)

23 VIDEOGRAPHER: We're back on now.

24 BY MR. ALTO:

25 Q Mr. Zohn, could you please take out

1 Exhibit 2 real quick and go to the last page. It  
2 looks like this is a separate set of text messages  
3 between you and Allison; is that fair?

4 A It looks like a continuation of the first.

5 Q Right. My question is it looks like the  
6 first set's from 1:12 p.m. to 1:46, and this other  
7 set is from 5:39 to 6:00. Do you see that?

8 A Yeah.

9 Q During the time this second period of  
10 conversations is happening where she says thanks for  
11 helping me, had you -- had the firearm already been  
12 purchased?

13 A I believe so.

14 MR. ALTO: Okay. Those are all the  
15 questions I have for you, Mr. Zohn. I  
16 appreciate it. These other lawyers may  
17 have some questions for you as well.

18 MR. BAHRET: Mr. Zohn, my name's Bob  
19 Bahret. I'm an attorney and I represent  
20 ADCO Firearms and Steve Thompson, the  
21 owner.

22 - - -

23 EXAMINATION

24 BY MR. BAHRET:

25 Q You and I have never met, have we?

1           A     No, I don't think so.

2           Q     And we've never spoken by telephone or  
3 anything, have we?

4           A     Huh-uh.

5           Q     That's a no?

6           A     No.

7           Q     Did your relationship with Allison Roebke  
8 amount to anything more than a friend?

9           A     Huh-uh.

10          Q     That's a no?

11          A     No.

12          Q     When you stayed in the hotel all night,  
13 did you stay in one room or two?

14          A     One.

15          Q     Did you stay in one bed or two?

16          A     Two.

17          Q     Okay. But you never had any kind of a  
18 sexual relationship with her?

19          A     None at all.

20          Q     She had asked you to purchase a gun  
21 because she thought she was unable to purchase a  
22 gun; is that right?

23          A     Correct.

24          Q     So the whole idea was to go to a gun store  
25 and act like you were the purchaser?

1           A     That's what I assume, but I don't know.  
2 She never said that.

3           Q     Okay. Well, that was what -- the  
4 assumption you were operating under, right?

5           A     Correct.

6           Q     So you wanted the store clerk to think you  
7 were purchasing this gun, correct?

8           A     No, not necessarily. It's when -- no.

9           Q     Okay. Well, why do you think Allison  
10 asked you to do it?

11          A     I think that Allison asked me to do it  
12 because she knew that she was not allowed to  
13 purchase a gun.

14          Q     She thought she was unable to purchase a  
15 gun?

16          A     That's what I was -- that was what --

17          Q     Okay.

18          A     -- she indicated to me.

19          Q     Did she ever tell you anything like she  
20 was involuntarily committed to a mental institution?  
21 Did you ever get into any of those details?

22          A     No.

23          Q     And these questions on Exhibit 3 on this  
24 form for the purchase of the gun, do you have any  
25 information that Allison, if she were answering

1 truthfully, would have given any different answers  
2 than you gave?

3 A That, I don't know.

4 Q Okay. On this form, you very clearly did  
5 say you were purchasing this gun for you, correct?

6 A Yes.

7 Q Okay. And you wanted the person you were  
8 talking to at the store to believe that, correct?

9 A I suppose.

10 Q Okay. Counsel asked you a series of  
11 questions about what the clerk asked, and you were  
12 saying no. Do you know that he didn't ask those  
13 questions or you just don't remember what questions  
14 he asked?

15 A Mostly I don't remember.

16 Q Okay. The clerk -- whether you remember  
17 the content of what was said, the clerk did ask some  
18 questions of you, right?

19 A That, I couldn't tell you.

20 Q All right. How long do you think you were  
21 in the store on either of the occasions that you  
22 were in ADCO?

23 A 20 minutes.

24 Q On each time?

25 A Maybe till a half an hour.

1 Q Okay. And during that time, some talk was  
2 happening, correct?

3 A Quite possibly.

4 Q I mean, you didn't have access to grab the  
5 guns yourself? You had to point to one and say hand  
6 me that one or something to that effect, right?

7 A Right.

8 Q And how many guns did you actually ask the  
9 clerk to bring out and show you?

10 A I didn't really have a -- I don't have an  
11 answer to that.

12 Q Do you know if it was more than one?

13 A Might have been two.

14 Q Okay. And are you sure that you didn't  
15 hand the cash to the clerk?

16 A I don't believe I did.

17 Q Okay. Are you sure?

18 A Am I sure? If it were yesterday, I could  
19 be sure. Today, I can't.

20 Q Okay. Well, I'm just curious, if the  
21 whole idea was for you to pretend you're buying the  
22 gun for you, why would you let Allison hand the  
23 money to the clerk? Why wouldn't --

24 A Because she had the money to begin with.

25 Q And she didn't hand it to you?

1           A       I don't think so.

2           Q       And you never had any conversation with  
3 Allison about what she wanted to do with the gun  
4 other than target shoot, correct?

5           A       Correct.

6           Q       She never said she was going to hurt  
7 herself or hurt anybody else?

8           A       No. Because I would not have -- you know,  
9 wouldn't have gone it -- gone along with it at all.

10          Q       You wouldn't --

11                         (Request from reporter to repeat  
12 testimony.)

13          A       I would not have gone along with it at  
14 all.

15          Q       I mean, if you thought she was going to  
16 hurt herself, you wouldn't have been part of that?

17          A       No.

18          Q       Okay. You believed her when she told you  
19 that she wanted to target shoot?

20          A       Yes.

21          Q       And you believed her when she told you  
22 that earlier in life she had done target shooting?

23          A       Yes.

24          Q       Did you ever talk to Allison's mother  
25 about Allison's state of mental health?

1 A No.

2 Q And I think you said you never met her  
3 father?

4 A Right.

5 Q And you never talked with him by telephone  
6 or any other method, correct?

7 A No.

8 Q All right. So he never told you anything  
9 about the state of her mental health either?

10 A Correct.

11 Q After her death, did you have any  
12 interaction or conversation with Allison's parents  
13 at all?

14 A Not until my court -- court appearance.

15 Q All right. And your court appearance was  
16 after you were charged?

17 A Oh, yeah. Yeah.

18 Q And what happened at the court appearance?

19 A I was found guilty of the straw purchase.

20 Q Was there a trial?

21 A Kind of, yeah.

22 Q There was?

23 A Put it this way: I was in a -- in the  
24 courthouse and the judge was there and the whole  
25 business and the attorneys.



1 Q Did you plead guilty?

2 A I must have.

3 Q Okay. So there was no trial?

4 A No.

5 Q And did you have an attorney?

6 A Yes.

7 Q Who was your attorney?

8 A I can't remember her name. I can't think  
9 of it right offhand.

10 Q Did you ever tell your attorney or the  
11 judge that Allison supposedly is the one that paid  
12 the clerk for the gun?

13 A I don't know.

14 Q That would have been pretty important for  
15 a criminal defense, would it not?

16 A Yeah. But there was no defense to be  
17 mounted.

18 (Request from reporter to repeat  
19 testimony.)

20 A Mounted.

21 Q Okay. And why would there be no defense  
22 if she purchased the gun?

23 A That's not mine to determine.

24 Q How was it not your decision?

25 A No, I didn't say it was not my decision.

1 I don't know. You just -- I'm starting to get  
2 confused.

3 Q I mean, you pled guilty to a charge saying  
4 that you claimed to be the purchaser of a gun --

5 A Yes.

6 Q -- when, in fact, you were not the  
7 purchaser, correct?

8 A Correct.

9 Q And so would you have pled guilty to that  
10 charge if Allison was the one that was interacting  
11 with the clerk and handing him the money and  
12 handling the gun in the store?

13 MR. ALTO: Objection. Speculation.

14 Go ahead.

15 Q He objected for the record, but you can  
16 answer.

17 A Well, state it again so I can understand  
18 what you're talking about.

19 Q Would you have pled guilty to the charge  
20 if it was really Allison interacting with the clerk  
21 and Allison handling the gun in the store and  
22 Allison handing the money to the clerk?

23 MR. ALTO: Same objection.

24 THE WITNESS: All right. You  
25 objected.

1 MR. ALTO: I'm --

2 Q It's for the record. You can go ahead and  
3 answer.

4 MR. ALTO: I am not instructing you  
5 not to answer. Go ahead.

6 A Okay. Guys are confusing me.

7 MR. ALTO: We're lawyers. Sorry.

8 THE WITNESS: I -- I know.

9 A I mean, I signed the thing. You know, I  
10 did something wrong, and I paid for it.

11 Q All right. Have you ever spoken with the  
12 attorneys for the Estate of Allison Roebke other  
13 than right here in this room today?

14 A No. Huh-uh.

15 Q Okay. And when you interacted with  
16 Allison's parents at your court hearing, what did  
17 you talk about?

18 A There was really no conversational  
19 interaction.

20 Q You just saw them?

21 A Saw them, and I don't remember if I said I  
22 was sorry that she shot herself.

23 Q You just don't remember the content of any  
24 interaction at all?

25 A No. Because it very -- it was minimal for

1 one thing.

2 Q Okay. But you're sure you were not the  
3 one that handed the cash to the clerk, or you think  
4 you're not the one that handed the cash to the  
5 clerk?

6 A I'm -- I think I'm not the one that handed  
7 the cash to the clerk.

8 Q Okay. If you were trying to give the  
9 clerk the impression that you were purchasing this  
10 gun for you, wouldn't it make sense that you would  
11 have been the one handing the cash to the clerk?

12 A Yeah, that would have made sense. But it  
13 also made sense to me at the time that, you know,  
14 she had the cash; he -- he wanted the cash; so, you  
15 know, he gave it -- she gave it to him.

16 Q And not to you?

17 A Not to me.

18 Q All right.

19 MR. BAHRET: Do you have anything you  
20 want to ask?

21 - - -

22 EXAMINATION

23 BY MR. JOHNSON:

24 Q Hey, Jerry. I'm Lee Johnson. How are you  
25 feeling?

1 A Just tired.

2 Q Okay. How old are you today?

3 A 73.

4 Q Okay. Is your wife still alive?

5 A I'm divorced, but she's still alive.

6 Q Okay. Around about July of 2020, were you  
7 divorced or still living with your wife?

8 A Still -- well, I was not living with her,  
9 but we weren't divorced.

10 Q Okay. Let's go back a little bit farther.  
11 If you're 73, where did you go to high school?

12 A Start.

13 Q What year did you graduate?

14 A '67.

15 Q That was the first graduating class of  
16 Start, wasn't it?

17 A '66 was.

18 Q So you --

19 A First four-year.

20 Q Okay. All right. So you got a good --  
21 good memory going back to high school, right?

22 A Yeah.

23 Q All right. You seem like a pretty sharp  
24 guy. Is anything bothering you to continue? You  
25 need a break or is everything good with you right

1 now?

2 A No, I'm fine.

3 Q Okay. All right. So who filed for  
4 divorce; you or your wife?

5 A I did.

6 Q Okay. For what reason?

7 A She couldn't -- I couldn't take her  
8 treating me like a child just because I had the  
9 Parkinson's.

10 Q Okay. What was your plan?

11 A Well, my plan was to move out, get my own  
12 place, and get -- get -- get on with things.

13 Q Okay. And you -- and you did that  
14 sometime in the calendar year 2020, correct?

15 A Yes.

16 Q When did you move out from the house that  
17 you used to share with your wife?

18 A It was before all this came up.

19 Q But not too much before, right?

20 A No. Huh-uh.

21 Q How many -- how many months or weeks  
22 before you met Allison?

23 A Two months.

24 Q Okay. That's how I understand it as well.  
25 So one of the reasons that you filed for divorce,

1 and this is a question, was, in your own words, to  
2 get on with your own life, and that included meeting  
3 other people, correct?

4 A Correct.

5 Q And some of those other people might have  
6 been women, correct?

7 A Yeah. Probably 50 percent of them.

8 Q And describe Allison. Tell -- tell me  
9 what she looked like.

10 A Dark hair, black hair, I think. Well --  
11 well kept.

12 Q Young? Old?

13 A She was in her mid 30s.

14 Q And you would have been in your early 70s  
15 at that time, correct?

16 A Yeah.

17 Q Would it be a true statement to say  
18 that -- that you at that time, May -- May, June,  
19 July of 2020 were looking to maybe meet younger  
20 females?

21 A No.

22 Q Okay.

23 A I mean, you can assume that, but maybe I  
24 would assume it, too, but, you know, that's not the  
25 idea or anything.

1 Q Did you enjoy the company of Allison?

2 A I enjoyed it because of the fact that she  
3 was -- she was bright and she was troubled.

4 Q Okay. How was she bright?

5 A Smart. Smart girl.

6 Q Okay. Do you feel that you were  
7 manipulated in any way by Allison?

8 A Do I? Now I would say yes.

9 Q Tell me how.

10 A Just because, you know, I -- I had asked  
11 her about was she going to hurt herself or anything,  
12 and she told me no.

13 Q So ultimately you're getting to what I'm  
14 going to put a finer point on, but let's just talk  
15 about your interactions with Allison because it's  
16 important to this proceeding.

17 Allison ultimately asked you to do  
18 something for her as it pertains to this case,  
19 correct?

20 A Uh-huh.

21 Q Yes?

22 A Yes.

23 Q She asked you on her behalf to buy her a  
24 firearm, correct?

25 A Correct.



1           Q       And these fine attorneys have -- have  
2 walked you through that process. You went first to  
3 ADCO sometime in June, correct?

4           A       (Witness nodded.)

5           Q       And at any time when you went into ADCO  
6 the first time, did you, Jerry, say to any clerk or  
7 employee of ADCO, I'm in here to purchase a gun for  
8 my friend that just happens to be a girl, her name  
9 is Allison?

10          A       No, I don't think I've ever said that.

11          Q       At any time ever did you ever say either  
12 implicitly or explicitly, that means either like  
13 wink-nod or nudge-nudge, hey, this really isn't for  
14 me, I really don't want to be here but I'm going to  
15 do this anyway? Did you ever say that to anybody at  
16 ADCO or specifically Steve Thompson?

17          A       No.

18          Q       Did you ever give any indication that  
19 anyone other than you was anything other than the  
20 purchaser of that .22 Ruger Wrangler?

21          A       I don't think I did.

22          Q       Okay. Why not?

23          A       Because the question never came up.

24          Q       Well, actually it did come up, and you've  
25 got it right there in that form. If you take a look

1 at Plaintiff's Exhibit 3, I believe it is. Can you  
2 take a look at that for me, sir?

3 A I got it right here.

4 Q I'm just going to read you a question  
5 because you seem like you're sharp. I just want to  
6 make sure that there's no confusion. The very first  
7 question -- well, let's start at the top where it  
8 says transferee. Do you know what a transferee  
9 means?

10 A Uh-huh.

11 Q Yes?

12 A Yes.

13 Q Also means a buyer, correct?

14 A Right.

15 Q It's got your name in there, right? Zohn,  
16 Z-O-H-N, correct?

17 A Correct.

18 Q Middle name Jerry, J-E-R-R-Y?

19 A That's the first name.

20 Q Middle name Lawrence --

21 A Right.

22 Q -- correct?

23 A Yeah.

24 Q And then what do you have for the address  
25 because I can't quite read it?

1           A       2252 Applet -- Applewood Drive.

2           Q       Now, who lived there, you or your wife or  
3 both?

4           A       Both.

5           Q       So that was the address that you shared  
6 with your wife, correct?

7           A       Correct.

8           Q       And how long did you live at Appleton?

9           A       How long did I reside there or --

10          Q       Yes, sir.

11          A       Is that -- okay.

12          Q       Yeah.

13          A       I would say a year.

14          Q       One year?

15          A       (Witness nodded.)

16          Q       With -- with your wife or that was just  
17 you there?

18          A       Just my -- or with my wife.

19          Q       Okay. Where did you live before Appleton?

20          A       5935 Berkey Southern Road, Berkey, Ohio.

21          Q       How long did you live there in Berkey?

22          A       42 years.

23          Q       Okay. So you had recently sold your place  
24 in Berkey and moved to Appleton; is --

25          A       Correct.

1 Q -- that correct?

2 Was that in contemplation of divorce or  
3 you just wanted to move into the city or --

4 A We wanted to move into the city --

5 Q Okay.

6 A -- and out of a two-story house.

7 Q At that time, were you contemplating  
8 divorce?

9 A No.

10 Q All right. So when you listed Appleton on  
11 the form, Plaintiff's Exhibit 3, was that accurate  
12 or not accurate? Were you --

13 A Yes.

14 Q You were living there at the time?

15 A Right.

16 Q Okay. That zip code is what? 43615?

17 A Yes.

18 Q All right. You listed your height and  
19 your weight, correct?

20 A (Witness nodded.)

21 Q Yes?

22 A Yes.

23 Q Are you 5 foot, 6?

24 A I was.

25 Q Okay. You don't weigh 200 any more, do

1 you?

2 A No. I lost like 40 pounds.

3 Q You look like you're much thinner.

4 A Thank you.

5 Q And then you listed your -- your sex as

6 being a male --

7 A Correct.

8 Q -- and your date of birth, correct?

9 A Correct.

10 Q And then it asked you to list your race,  
11 and you listed it as white, correct?

12 A Correct.

13 Q Now, do you see the very first question?

14 It's num -- it's Question Number 11a.

15 A Uh-huh.

16 Q Yes?

17 A Yes.

18 Q And it says -- tell me if I read this  
19 wrong -- are you the actual transferee/buyer of the  
20 firearm listed on this form. Correct?

21 A Yes.

22 Q And you checked unequivocally yes,  
23 correct?

24 A Correct.

25 Q So tell me what your mental thought

1 process was at that time when you answered that  
2 question?

3 A I'd answered it that way because I -- I  
4 was doing this for Allison because she wanted -- she  
5 ultimately wanted the gun.

6 Q So when you answered that, you knew you  
7 were being deceptive, correct?

8 A Correct.

9 Q You knew you were lying, correct?

10 A Correct.

11 Q Did you tell that to anyone other than the  
12 thoughts in your head? Did you tell it to the  
13 clerk?

14 A No.

15 Q Did you give the clerk any indication that  
16 you were lying on that form?

17 A No.

18 Q Do you -- can you articulate anything to  
19 me that would have tipped the clerk off that you  
20 were being untruthful?

21 A No.

22 Q Attorney Bahret asked you a couple of  
23 questions, and you said at one point, quote, I paid  
24 for it. Did you get confused, or do you think that  
25 it's possible that you paid for it, meaning the gun?

1           A     I don't remember saying that I paid for  
2 it.

3           Q     Okay. So you think you might have  
4 misspoke?

5           A     I could have.

6           Q     All right. So let me -- let me just ask  
7 you. Is it possible that you paid for the gun?

8           A     No, not out of my own funds. I --

9           Q     I didn't ask where the money came from. I  
10 asked if it was possible that from your hand went  
11 either cash or a credit card to the clerk?

12          A     Is it possible? Yeah, it's possible, but  
13 I don't think it happened that way.

14          Q     Okay. Do you have a recollection of how  
15 it did happen?

16          A     No, I don't.

17          Q     How many times have you been arrested in  
18 your life?

19          A     Just that once.

20          Q     Okay. The once where -- where you were  
21 charged with a straw purchase?

22          A     Correct.

23          Q     How did you learn that Allison had died?

24          A     When I was at the park and the detective  
25 from Sylvania came up and he asked me to come to

1 their office, and I did, and he told me.

2 Q Do you remember the detective's name?

3 A No.

4 Q Was it Jake Albright?

5 A Could have been.

6 Q How many times have you ever been asked to  
7 go to a police station and answer questions before  
8 that date in time?

9 A That was the only time.

10 Q Okay. So it should be pretty memorable in  
11 your head, right?

12 A Yeah. But I don't remember those little  
13 things.

14 Q You don't remember what?

15 A Those little things like -- I mean, it's  
16 not little, but I don't remember that.

17 Q When -- when the detective asked you to go  
18 down and answer questions, you had not been arrested  
19 yet, correct?

20 A No.

21 Q So did you know -- did you feel frightened  
22 or anxiety about why you were going down there?

23 A Yes.

24 Q Did you know what it was about, that you  
25 were going to talk about Allison?



1           A     No.  But I had some inkling.

2           Q     And then -- then an interview started,  
3 right, where the detective started to interview you,  
4 correct?

5           A     Correct.

6           Q     And he -- he asked you if you knew Allison  
7 Roebke, correct?

8           A     Uh-huh.

9           Q     And you told him similar things to what  
10 you've said in this deposition today, correct?

11          A     Correct.

12          Q     Was that interview the first time that you  
13 learned that Allison Roebke was dead?

14          A     Yes.

15          Q     Did you -- did you learn how she died?

16          A     Well, yes.  Especially after I --  
17 especially after I saw the pictures.

18          Q     Okay.  So he showed you post-mortem,  
19 meaning post-death, photographs?

20          A     Uh-huh.

21          Q     Yes?

22          A     Yes.

23          Q     Okay.  And did you come to learn that it  
24 was at the hands of the small caliber handgun that  
25 you had purchased?

1           A     I don't remember learning that, but I  
2 would assume that that was the case.

3           Q     Okay. The detective asked you during that  
4 interview if you purchased a gun and if you gave it  
5 to Allison; is that true?

6           A     I don't remember him asking me that.

7           Q     What do you remember him asking you about  
8 the gun --

9           A     I don't --

10          Q     -- and the transfer to Allison?

11          A     I don't remember.

12          Q     Okay.

13          A     To --

14          Q     But it is correct that you purchased a .22  
15 caliber gun from ADCO, correct?

16          A     (Witness nodded.)

17          Q     Yes?

18          A     Yes.

19          Q     And at some point, you gave it to Allison,  
20 correct?

21          A     I don't know if I gave it to her or she  
22 took it out of the store herself.

23          Q     Okay. Let -- let -- let's talk about what  
24 you might remember and what you might have told the  
25 detective. At some point the detective asked you is

1 it true that you purchased a .22 caliber handgun  
2 from ADCO Firearms. He asked you that, correct?

3 A I don't remember him asking me that  
4 particularly.

5 Q Okay. Then did he state it to the fact;  
6 as a matter of fact, you purchased a .22 caliber  
7 from ADCO?

8 A Yeah, there was no argument about that.

9 Q Okay. And then he said, why did you give  
10 her the gun or something to that effect; did that  
11 type of question happen during the interview  
12 process?

13 A I don't remember that.

14 Q Okay. Do you remember replying something  
15 to the effect of it might have been one of the  
16 biggest regrets and mistakes of your life?

17 A Probably.

18 Q Okay. Why would you say that?

19 A Because I would never have allowed anybody  
20 under my -- I would never allowed her to -- to have  
21 anything to do with the buying of the gun -- gun to  
22 hurt herself.

23 Q Because you're a trained social worker,  
24 correct?

25 A Well, I'm more of a trained respiratory

1 therapist.

2 Q Okay. Allison Roebke never told you that  
3 she intended to do harm to herself, correct?

4 A No, she never did that.

5 Q Allison Roebke -- Roebke told you that she  
6 used to shoot targets, correct?

7 A Correct.

8 Q During the discussion or the purchase of  
9 that .22 caliber handgun, did you ever talk about  
10 that might be an appropriate small caliber gun to do  
11 target shooting?

12 A I don't know. I don't think that ever  
13 came up.

14 Q Attorney Alto showed you some text  
15 messages where she was talking about a larger  
16 caliber. What did that mean to you?

17 A The only thing that she -- that it could  
18 have meant is she was talking about a .38 or  
19 something like that.

20 Q Okay.

21 (Request from reporter to repeat  
22 testimony.)

23 A A .38.

24 Q Okay. .38 meaning larger than a .22,  
25 correct?

1           A     I'm assuming that, because the .22 is --  
2     .22 is smaller than a .30 -- .38.

3           Q     That's right.  So what did you say in  
4     response to that?

5           A     You know, I don't remember.

6           Q     Okay.  Did you ever have any discussions  
7     with Allison about going target shooting?

8           A     No.

9           Q     Okay.  During that interview with the  
10    detective -- and if you don't remember, you don't  
11    remember, but I'd like you to think as hard as --  
12    hard as you can -- the question came up of when and  
13    why did you give that gun to Allison.  What do you  
14    believe that you stated?

15          A     I don't remember the question coming up.

16          Q     Okay.  At what point did you learn that  
17    you were going to be arrested?

18          A     When the ATF people and about four other  
19    black SUVs pulled up, got out of their -- their cars  
20    with their guns pointed at me.  That's kind of --  
21    kind of -- I assumed that that was going to happen.

22          Q     Did that happen after the interview with  
23    the detective that you can't recall?

24          A     Oh, yeah.  Yeah.  Yeah.

25          Q     How long after that?

1           A     Couple weeks.

2           Q     Okay. Attorney Bahret asked you if you  
3 mounted any type of defense, and you said there was  
4 no defense. Is that still what you stand by?

5           A     Well, you know, I don't know what kind of  
6 defense -- I mean, like I didn't deny that I did  
7 sign for that gun, and so I didn't think that there  
8 was any defense to be mounted.

9           Q     Okay. I started the questioning with do  
10 you feel that you were manipulated by Allison, and  
11 you said kind of.

12          A     Uh-huh.

13          Q     Now that we've talked about it a little  
14 bit, can you articulate why you feel you were  
15 manipulated by her now?

16          A     Yeah. Because she said that she wanted to  
17 use it for target practice -- practice. And whether  
18 or not she did want to do that, obviously she didn't  
19 do that, so, you know, I -- I feel that that was a  
20 manipulation.

21          Q     Did you ever feel that Allison was  
22 suicidal?

23          A     No.

24          Q     Did she ever give you any indication to  
25 believe that she would ever use the firearm that you

1 purchased from ADCO or any other firearm to do harm  
2 to herself?

3 A No.

4 MR. JOHNSON: Thank you, Jerry. I  
5 don't have anything further.

6 - - -

7 EXAMINATION

8 BY MR. ALTO:

9 Q Mr. Zohn, Mr. Johnson asked you some  
10 questions about a police interview that you gave.  
11 He didn't show you a copy of that, did he?

12 A No.

13 Q You haven't seen it?

14 A Huh-uh.

15 Q Have you ever seen it?

16 A I don't think so.

17 Q Okay. And then he quoted some things  
18 that -- that you maybe said during that interview;  
19 do you recall that?

20 A I remember him saying that, yeah.

21 Q Okay. In the police report you've got in  
22 front of you, in number -- in Exhibit Number 2, the  
23 detective wrote, Jerry stated that he didn't have  
24 any money so Allison paid for the gun. Did you tell  
25 the detective that?

1           A     I didn't have money to buy the gun, and I  
2 wasn't -- I wouldn't have if --

3           Q     And you told him that Allison paid for the  
4 gun; is that right?

5           A     Correct.

6                     MR. ALTO:  Okay.  I don't have any  
7 further questions.

8                                     - - -

9                                     EXAMINATION

10          BY MR. BAHRET:

11           Q     Mr. Zohn, I'm confused about one small  
12 point.  You -- you were already separated from your  
13 wife living at a separate location by the time you  
14 met Allison?

15           A     Uh-huh.

16           Q     That's a yes?

17           A     Yes.

18           Q     And were you at the --

19           A     2252.

20           Q     You were at that address and your wife was  
21 staying somewhere else?

22           A     No.  She was staying there.  I was staying  
23 with a friend.

24           Q     So you were with a friend, not with your  
25 wife --



1           A     Correct.

2           Q     -- when you met Allison?

3           A     Correct.

4           Q     So this address that is on this form that  
5 was given to ADCO, that was your wife's address and  
6 was not your address?

7           A     It was not -- excuse me. It was not -- it  
8 was not where I was staying.

9           Q     Okay.

10          A     It was my official address.

11          Q     If you wanted to have a conversation with  
12 Allison since you weren't in the same house as your  
13 wife any more, you could have taken her to where you  
14 were actually staying, right?

15          A     Yeah. But I never took her there. It was  
16 always out -- over the phone.

17          Q     Or in person?

18          A     Correct.

19          Q     But you wouldn't have any need to go to a  
20 hotel in Lima?

21          A     No.

22          Q     So why didn't you take her there instead  
23 of going to a hotel in Lima?

24          A     Because she wanted to go for a ride.

25          Q     Who paid for the hotel?

1           A       I think we split it.

2                   MR. BAHRET: I have nothing further.

3                   MR. JOHNSON: Nothing.

4                   MR. ALTO: I don't have anything  
5 else. Thank you very much, Mr. Zohn.

6                   (Whereupon, this discussion was held  
7 off the video.)

8                   MR. BAHRET: Mr. Zohn, I don't  
9 represent you, so I can't tell you what to  
10 do, but you have the right to read this  
11 when it's typed up, and you can attach  
12 what's called an errata sheet. You can  
13 make corrections and then sign it, or you  
14 can waive all that. What's your pleasure?

15                   THE WITNESS: Well, I don't see -- I  
16 don't -- I can't think of anything I can  
17 dispute.

18                   MR. BAHRET: You haven't read it yet.

19                   MR. ALTO: You have -- is it 30 days  
20 to read? If you choose, like Mr. Bahret  
21 mentioned, you have 30 days to read it and  
22 confirm it's accurate or make any changes  
23 that you deem appropriate.

24                   THE WITNESS: Okay.

25                   MR. ALTO: We can't tell you what to

1 do. It's your decision.

2 MR. BAHRET: You just need to tell  
3 her.

4 MR. ALTO: You either tell her you're  
5 going to read the transcript or you're  
6 going to waive.

7 THE WITNESS: I'll read it. Just out  
8 of nothing else, out of curiosity.

9 MR. BAHRET: Very good.

10 (Whereupon, the deposition was  
11 concluded at 12:52 p.m.)

12 - - -

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-----  
JERRY L. ZOHN

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## C-E-R-T-I-F-I-C-A-T-E

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I, Teresa Genovese Mauro, a Notary Public in and for the State of Ohio, duly commissioned and qualified, do hereby certify that the within-named Witness, **JERRY L. ZOHN**, was by me first duly sworn to tell the truth, the whole truth and nothing but the truth in the cause aforesaid; that the testimony then given by him was by me reduced to stenotype in the presence of said Witness, afterwards transcribed upon a computer; that the foregoing is a true and correct transcription of the testimony so given by him as aforesaid.

10

11

12

I do further certify that this deposition was taken at the time and place in the foregoing caption specified and was completed without adjournment.

13

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I do further certify that I am not a relative, employee of or attorney for any of the parties in the above-captioned action; I am not a relative or employee of an attorney of any of the parties in the above-captioned action; I am not financially interested in the action; I am not, nor is the court reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28(D).

19

20

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Toledo, Ohio, on this 9th day of January, 2023.

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My Commission expires  
June 8, 2023.

*Teresa J. Mauro*  
\_\_\_\_\_  
TERESA GENOVESE MAURO  
Notary Public  
in and for the State of Ohio

**POLICE REPORT**  
**SYLVANIA TOWNSHIP**  
**POLICE DEPARTMENT**

No Crime  Crime  Supplement

VICTIM <b>ROEBKE, ALLISON E.</b>	RB # <b>001255-20</b>
Location of Occurrence <b>8645 STONE POST RD, SYLVANIA, OH 43560</b>	CAD #
Location Type <b>HOME, SINGLE FAMILY</b>	Supplement Date and Time <b>08/28/2020 10:40</b>

Offense Description <b>SUICIDE</b>	Violation <b>MIS 40206</b>	A/C <b>C</b>	F/M & Degree <b>UC</b>	Occurred Date and Time <b>07/07/2020 20:00 - 07/07/2020 20:00</b>
Hate Bias Type <b>NOT</b>	Premise/Structure <b>Criminal Activity</b>	Using <input type="checkbox"/> Alcohol <input type="checkbox"/> Drugs	Reported Date and Time <b>07/08/2020 15:15</b>	Beat <b>ST1</b>
Method of Entry <input type="checkbox"/> Force <input type="checkbox"/> No Force	Method of Entry Vehicle	Larceny Type	TWN	
Method of Entry Burg / B&E	Burg Point of Entry	Burg Point of Exit		

Additional MO Details	# Prom. Entered <b>0</b>	If D.V., Child Present <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	# Children Present	Type Weapon Used By
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Susp # <b>1</b>	Juvenile <input type="checkbox"/>	Check Appropriate Category <input type="checkbox"/> Runaway <input type="checkbox"/> Missing <input type="checkbox"/> Other	<input type="checkbox"/> Student <input type="checkbox"/> Faculty <input type="checkbox"/> Warrant Issued	Charges Fied?
Name (Last, First, Middle) <b>ZOHN, JERRY</b>	Phone <b>(419) 345-5013 (C)</b>			
Address (Street, Apt., City, State, Zip) <b>6216 SASSAFRAS LN, TOLEDO, OH 43615</b>	SSN	All. Phone		
Place of Birth	*Resident Status <b>NOT REPORTED</b>	Marital Status		
*Age <b>70</b>	*DOB <b>10/21/1949</b>	*Race <b>White</b>	*Sex <b>Male</b>	*Hgt <b>506</b>
*Wgt <b>200</b>	*Hair <b>Gray</b>	*Eyes <b>Blue</b>	Potential Injuries?	
Statements Obtained <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Type: <input type="checkbox"/> Written <input type="checkbox"/> Oral <input type="checkbox"/> Taped <input type="checkbox"/> Other	Gang Affiliation		
Suspected of Using <input type="checkbox"/> Alcohol <input type="checkbox"/> Drugs	Armed With	Arrest Type 1. <input type="checkbox"/> Complaint 2. <input type="checkbox"/> On View 3. <input type="checkbox"/> Warrant 4. <input type="checkbox"/> Summons 5. <input type="checkbox"/> Protection Order 6. <input type="checkbox"/> Other		

*Property Status	1 None 2 Burned	3 Counterfeited/Forged 4 Destroyed/Damaged/Vandalized	5 Stolen/Lost 6 Seized	7 Recovered 8 Involved	E Evidence ED Digital Evidence	Total Items <b>2</b>	Total Value <b>0.00</b>	
No <b>1</b>	*Prop. Status <b>E</b>	Quantity <b>1</b>	Description <b>OTHER WEAPONS (1) Ruger Wrangler revolver with cylinder removed from weapon and in box.</b>					Value
Make/Brand <b>RUGER</b>	Model <b>WRANGLER</b>	Value Recovered	Date Recovered	From Veh. No.				
Owner <b>ROEBKE, ALLISON E.</b>	Serial Number <b>20090541</b>	NCIC Number	Other Number					
No. <b>2</b>	*Prop. Status <b>E</b>	Quantity <b>1</b>	Description <b>DVD- interview of Jerry Zohn</b>					Value
Make/Brand	Model	Value Recovered	Date Recovered	From Veh. No.				
Serial Number	NCIC Number	Other Number						

**DISPOSITION: INVESTIGATION CONTINUES**

**CORRECTION:** In my prior supplemental report I incorrectly stated that there was a pool of blood under Allison's head, behind her "left ear". The pool of blood was actually behind Allison's right ear.

The serial number for the recovered revolver was checked through a database maintained by The Bureau of Alcohol, Tobacco, Firearms and Explosives National Tracing Center. A Firearms Trace Summary later received from The Bureau of Alcohol, Firearms and Explosives revealed that the revolver recovered from Allison's bedroom was purchased by Jerry Lawrence Zohn D.O.B. 10/21/1949 on 7/02/20 at Adco Firearms 6481 Monroe St. Sylvania, Ohio 43560.

On July 29, 2020 I met with the owner of Adco Firearms, Steve Thompson, who stated that he remembered seeing Allison

Report Made By <b>474 ROOKS, L; 426 ALBRIGHT, J 426</b>	Officer(s) Name(s) I.D.# Unit No./Section	Officer Assigned to Case	Supervisor's Approval <b>486 BOTTLES, B</b>
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DISPOSITION <b>I 08/28/2020</b>	A. Death of Offender G Cleared by Arrest - Juv R Report Written	B. Prosecution Declined H Warrant Issued S Summons Sent	C. Extradition Denied I Investigation Pending	D. Victim Refuses to Cooperate J Inactive	E. Juvenile/No Custody K Unfounded	F. Cleared by Arrest - Adult
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**PLAINTIFF'S EXHIBIT**

7

10/2/2022

**POLICE REPORT**  
SYLVANIA TOWNSHIP  
POLICE DEPARTMENT

VICTIM  
ROEBKE, ALLISON E

RB #  
001255-20  
CAD #

Page 2 of 3

Roebke and Jerry Zohn in the store together on at least 2 occasions. Steve stated that he remembered Allison and Jerry because there seemed to be a "strange dynamic" between them. Steve further stated however, that there were no indications that they were attempting to make a "Straw Purchase" of a firearm. Steve advised that Jerry purchased a .22 caliber revolver and 2 boxes of ammunition.

Steve stated that he has security cameras in the store, but the footage from the day that Jerry purchased the gun is no longer available.

On July 30, 2020 information was received that Jerry might be at Secor Metropark. I went to the park and found Jerry sitting in his car reading. I approached Jerry, told him who I was and requested that he follow me to the Police department to discuss a case that I was working on. Jerry agreed to do so and followed me back to the station.

Upon our arrival at the Police department, Jerry was placed in an interview room that is video and audio recorded. The following interview was recorded onto a DVD and booked into the Property Room.

Jerry was advised that the door to the interview room was unlocked, that he was not under arrest and that he was free to leave at any time. Jerry was read his Miranda Rights and signed a Waiver of Rights form.

Jerry stated that he met Allison at the park (Secor Metropark). Allison approached Jerry, who was sitting in his car, and told him that she liked his car. Jerry further stated that Allison had a very "terrible, worried, upset about ready to cry look on her face." Jerry asked Allison what was wrong and she replied, "nothing." Jerry then stated that he started to talk to her because he has a background in Social Work and some Psychology.

Jerry skipped ahead in his story to a "couple days later" and said that he saw Allison at the park again. Jerry again asked Allison if she was okay, but she was initially reluctant to talk about what was going on. Allison then told Jerry that she "hears voices and a whole bunch of other stuff." Jerry then stated that he thought to himself, "this girl's not 100% right." Jerry advised that he decided to try to help her out by listening and talking to her. As time progressed, Jerry and Allison went out to lunch on a couple of occasions and became friends. Jerry estimated that he first met Allison about 2 months prior.

Jerry stated that they had taken trips to several places for the afternoon and most of the time Allison was "pretty stable." One time, they were heading south and Allison got really worried and didn't want to go home. Jerry stated that they stopped at a hotel in Bluffton, Ohio (Comfort Inn) and spent the night. During the night, Allison couldn't sleep and kept "moaning." When they got up in the morning they drove back and he dropped her off at her home in Sylvania. Jerry initially couldn't remember when they took the trip, but eventually stated, "I'm going to say 3 weeks ago." Jerry advised that they stayed at the hotel on a Wednesday (Possibly July, 8).

Jerry stated that throughout their relationship, Allison frequently told Jerry that she was hearing voices that were telling her different things, but they never told her to harm anyone. Jerry then stated that the voices would tell her that she was in trouble.

Jerry stated that several days after the trip to Bluffton (Possibly July 13), he was supposed to pick Allison up and take her to a doctor's appointment. When he arrived at 9:00 a.m. Allison's car was in the driveway, but she never came out of the house. Jerry tried calling and texting her, but she did not reply and he left at around 9:30a.m. Jerry tried calling and texting

**POLICE REPORT**  
SYLVANIA TOWNSHIP  
POLICE DEPARTMENT

VICTIM  
ROEBKE, ALLISON E

RB #  
001255-20  
CAD #

Page 3 of 3

Allison for the next couple of days, but did not receive a response and assumed that she did not want to deal with him anymore.

When I asked Jerry if he had any guns, he initially stuttered when responding, but eventually said, "Only one and this is one of the biggest mistakes I've made." He then said that Allison had told him that she and her cousin used to go target shooting at a range. Jerry further stated that Allison wanted a gun, but was afraid that she couldn't get one because she had a history of being in a mental institution. Jerry stated that he didn't have any money so Allison paid for the gun, but it is under his name. Jerry stated that Allison took possession of the gun after the purchase and he has been concerned about it ever since. Jerry estimated that he bought the gun about a week before their trip to Bluffton.

Jerry stated that they purchased the gun at Adco Firearms in Sylvania but they had also shopped for a gun in Michigan.

I recounted to Jerry how he had said that Allison had told him that she was in big trouble. I asked Jerry if she was in trouble with a person, at which time he said that Allison told him that "they" controlled her sleep and her bowels. Jerry then agreed that it was a bad idea for him to buy a gun for Allison. When asked why he bought the gun for her, Jerry said, "I don't know."

I informed Jerry that Allison was dead and it appeared that she killed herself with the gun that he had purchased for her. Jerry denied that Allison ever told him that she wanted to commit suicide.

I explained to Jerry that he had committed a crime by buying a gun for someone that is prohibited from purchasing or possessing one and he replied, "I can imagine."

Earlier in the interview, Jerry told me that he has Parkinson's Disease. Jerry was also aware that Allison has Multiple Sclerosis so I asked him if he sympathized with her and wanted to help her get a gun to commit suicide? Jerry was adamant that Allison ever mentioned committing suicide either in person or by cellular phone text message.

This Detective spoke with Lucas County Prosecutor J. Lingo regarding this case. Prosecutor Lingo advised me to release Jerry and forward a copy of my report to him for review.

On July 31, 2020 a preservation request was sent to Verizon Wireless for Jerry's cell phone records pending the issuance of a Search Warrant.

On August 18, 2020 a Search Warrant was obtained through Lucas County Common Pleas Court for Verizon Wireless to provide Jerry's cell phone records to me. The warrant was faxed to: Cellco Partnership DBA Verizon Wireless at 1-888-667-0026.

Investigation continues.

**POLICE REPORT**  
**SYLVANIA TOWNSHIP**  
**POLICE DEPARTMENT**

No Crime  Crime  Supplement

VICTIM <b>ROEBKE, ALLISON E</b>	RB # <b>001255-20</b>
Location of Occurrence <b>8645 STONE POST RD, SYLVANIA, OH 43560</b>	CAD #
Location Type <b>HOME, SINGLE FAMILY</b>	Supplement Date and Time <b>09/14/2020 11:33</b>

Offense Description <b>SUICIDE</b>	Violation <b>MIS 40206</b>	A/C <b>C</b>	F/M & Degree <b>UC</b>	Occurred Date and Time <b>07/07/2020 20:00 - 07/07/2020 20:00</b>
				Reported Date and Time <b>07/08/2020 15:15</b>
Hate Bias Type <b>NOT</b>	Premises/Structure	Criminal Activity	Using <input type="checkbox"/> Alcohol <input type="checkbox"/> Drugs <input type="checkbox"/> Camp Equip <input type="checkbox"/> Not App	
Method of Entry <input type="checkbox"/> Force <input type="checkbox"/> No Force	Method of Entry Vehicle		Larceny Type	
Method of Entry Burg / B&E	Burg Point of Entry		Burg Point of Exit	

Additional MO Details	# Prem. Entered <b>0</b>	# D.V., Child Present <input type="checkbox"/> Y <input type="checkbox"/> N	# Children Present	Type Weapon Used By				
PROPERTY	Property Status	1 None 2 Burned	3 Counterfeited/Forged 4 Destroyed/Damaged/Vandalized	5 Stolen/Lost 6 Seized	7 Recovered Involved	E Evidence ED Digital Evidence	Total Items <b>1</b>	Total Value <b>0.00</b>
	No. 1	*Prop. Status <b>E</b>	Quantity <b>1</b>	Description <b>DVD-phone records</b>				Value
	Make/Brand	Model		Value Recovered	Date Recovered	From Veh. No.		
	Serial Number	NCIC Number		Other Number				

**DISPOSITION: DIRECTED TO PROSECUTOR**

On or about September 8, 2020 I received Jerry Zohn's Verizon Wireless phone records. The records were copied onto a C.D. and logged into the property room.

Verizon Wireless included a note with the records that indicated that text message content was not included because the dates requested were not within the date range that they retain. I called Verizon Wireless about the notation and I was informed that text message content is only retained on their servers for 3-5 days.

A limited amount of text message content was found in the documentation that Verizon sent to me. Several text messages between Jerry and Allison from July 2, 2020 were found that was related to the purchase of a gun. The following conversation was put into chronological order, by Verizon time-stamp:

1:12 (Allison) "Can I ask you for a huge favor? I want to buy a small pistol offline to get my shooting back on track but it needs to ship to the store and get picked up. Can I order it in your name and give you the money? We can pick it up next week"

1:20 (Jerry) "Why not buy it under your own name?"

1:33 (Allison) "long story"

1:40 (Jerry) "This might be better on face to face talk"

1:41 (Allison) "well can you meet me at secor park?"

1:42 (Jerry) "I'm not at the park im at Panera"

1:44 (Allison) "qell can we just go pick one out?"

1:45 (Jerry) "Pistol?"

1:45 (Allison) "yes"

1:46 (Jerry) "Why don't you just come here and we can talk about it"

1:46 (Allison) "what Panera?"

1:46 (Jerry) "Central"

Report Made By: <b>474 ROOKS, L; 426 ALBRIGHT, J 426</b>	Officer(s) Name(s) I.D.# Unit No/Section	Officer Assigned to Case	Supervisor's Approval <b>480 BOTTLES, B</b>
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DISPOSITION <b>V 09/14/2020</b>	A Death of Offender G Cleared by Arrest - Juv R Report Written	B Prosecution Declined H Warrant Issued S Summons Sent	C Extradition Denied I Investigation Pending	D Victim Refuses to Cooperate J Inactive	E Juvenile/No Custody K Unfounded	F Cleared by Arrest - Adul U Unknown
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**POLICE REPORT**  
SYLVANIA TOWNSHIP  
POLICE DEPARTMENT

VICTIM ROEBKE, ALLISON E	RB # 001255-20
	CAD #

5:39 (Allison) "thanks for helping me—we might have to get a larger caliber, we can check out that other place sometime"  
5:40 (Jerry) "Okay"  
5:59 (Allison) "We can look into a pistol too—cocking it back is a hassel each time."  
6:00 (Jerry) "I think it would be"

The remaining data that I received pertains to subscriber information and location data, which does not offer any evidentiary value as to whether or not Jerry knew that Allison was going to take her own life.

It was determined that Allison Roebke's cellular phone provider is Sprint. Sprint does not retain text message content therefore; a Search Warrant was not obtained for her cell phone records.

This report will be sent to The Lucas County Prosecutor's Office for review.

# Firearms Transaction Record

**WARNING:** You may not receive a firearm if prohibited by Federal or State law. The information you provide will be used to determine whether you are prohibited from receiving a firearm. Certain violations of the Gun Control Act, 18 U.S.C. 921 et. seq., are punishable by up to 10 years imprisonment and/or up to a \$250,000 fine.

Transferor's/Seller's  
Transaction Serial  
Number (If any)

9930

Read the Notices, Instructions, and Definitions on this form. Prepare in original only at the licensed premises ("licensed premises" includes business temporarily conducted from a qualifying gun show or event in the same State in which the licensed premises is located) unless the transaction qualifies under 18 U.S.C. 922(c). All entries must be handwritten in ink. "PLEASE PRINT."

### Section A - Must Be Completed Personally By Transferee/Buyer

1. Transferee's/Buyer's Full Name (If legal name contains an initial only, record "IO" after the initial. (If no middle initial or name, record "NAMN").  
Last Name (Including suffix (e.g., Jr, Sr, II, III)) | First Name | Middle Name

Zohar | Tracy | LAWRENCE

2. Current State of Residence and Address (U.S. Postal abbreviations are acceptable. Cannot be a post office box.)

Number and Street Address | City | County | State | ZIP Code  
2252 Aikenwood | Toledo | Lucas | OH | 43617

3. Place of Birth | 4. Height | 5. Weight | 6. Sex | 7. Birth Date  
U.S. City and State | Foreign Country | Ft. | In. | (Lbs.) | Male | Female | Month | Day | Year  
Toledo OH | -OR- | | | 5 | 6 | 200 |  Male |  Female | | | 1989

8. Social Security Number (Optional, but will help prevent misidentification) | 9. Unique Personal Identification Number (UPI/N) if applicable (See Instructions for Question 9.)

10.a. Ethnicity | 10.b. Race (In addition to ethnicity, select one or more race in 10.b. Both 10.a. and 10.b. must be answered.)  
 Hispanic or Latino |  American Indian or Alaska Native |  Black or African American |  White  
 Not Hispanic or Latino |  Asian |  Native Hawaiian or Other Pacific Islander

11. Answer the following questions by checking or marking "yes" or "no" in the boxes to the right of the questions.

	Yes	No
a. Are you the actual transferee/buyer of the firearm(s) listed on this form? Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you. Exception: If you are picking up a repaired firearm(s) for another person, you are not required to answer 11.a. and may proceed to question 11.b. (See Instructions for Question 11.a.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Are you under indictment or information in any court for a felony, or any other crime for which the judge could imprison you for more than one year? (See Instructions for Question 11.b.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have you ever been convicted in any court of a felony, or any other crime for which the judge could have imprisoned you for more than one year, even if you received a shorter sentence including probation? (See Instructions for Question 11.c.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Are you a fugitive from justice? (See Instructions for Question 11.d.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Are you an unlawful user of, or addicted to, marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance? Warning: The use or possession of marijuana remains unlawful under Federal law regardless of whether it has been legalized or decriminalized for medicinal or recreational purposes in the state where you reside.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Have you ever been adjudicated as a mental defective OR have you ever been committed to a mental institution? (See Instructions for Question 11.f.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Have you been discharged from the Armed Forces under dishonorable conditions?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Are you subject to a court order restraining you from harassing, stalking, or threatening your child or an intimate partner or child of such partner? (See Instructions for Question 11.h.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Have you ever been convicted in any court of a misdemeanor crime of domestic violence? (See Instructions for Question 11.i.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

12.a. Country of Citizenship: (Check/List more than one, if applicable. Nationals of the United States may check U.S.A.)  
 United States of America (U.S.A) |  Other Country/Countries (Specify):

	Yes	No
12.b. Have you ever renounced your United States citizenship?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12.c. Are you an alien illegally or unlawfully in the United States?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12.d.1. Are you an alien who has been admitted to the United States under a nonimmigrant visa? (See Instructions for Question 12.d.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12.d.2. If "yes", do you fall within any of the exceptions stated in the instructions?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

13. If you are an alien, record your U.S.-Issued Alien or Admission number (AR#, USCIS#, or other)

PLAINTIFF'S EXHIBIT  
3  
7/21/19

I certify that my answers in Section A are true, correct, and complete. I have read and understand the Notices, Instructions, and Definitions on ATF Form 4473. I understand that answering "yes" to question 11.a. if I am not the actual transferee/buyer is a crime punishable as a felony under Federal law, and may also violate State and/or local law. I understand that a person who answers "yes" to any of the questions 11.b. through 11.j and/or 12.b. through 12.e. is prohibited from purchasing or receiving a firearm. I understand that a person who answers "yes" to question 12.d.1. is prohibited from receiving or possessing a firearm, unless the person answers "yes" to question 12.d.2. and provides the documentation required in 18.c. I also understand that making any false oral or written statement, or exhibiting any false or misrepresented identification with respect to this transaction, is a crime punishable as a felony under Federal law, and may also violate State and/or local law. I further understand that the repetitive purchase of firearms for the purpose of resale for livelihood and profit without a Federal firearms license is a violation of Federal law. (See Instructions for Question 14.)

14. Transferee's/Buyer's Signature  15. Certification Date 7/2/20

**Section B - Must Be Completed By Transferor/Seller**

16. Type of firearm(s) to be transferred (check or mark all that apply):  
 Handgun     Long Gun (rifles or shotguns)     Other Firearm (frame, receiver, etc. See Instructions for Question 16.)

17. If transfer is at a qualifying gun show or event:  
 Name of Function: \_\_\_\_\_  
 City, State: \_\_\_\_\_

18.a. Identification (e.g., Virginia Driver's license (VA DL) or other valid government-issued photo identification.) (See Instructions for Question 18.a.)

Issuing Authority and Type of Identification <u>OHDL</u>	Number on Identification <u>RH192853</u>	Expiration Date of Identification (if any)		
		Month <u>10</u>	Day <u>21</u>	Year <u>20</u>

18.b. Supplemental Government Issued Documentation (if identification document does not show current residence address) (See Instructions for Question 18.b.)

18.c. Exception to the Nonimmigrant Alien Prohibition: If the transferee/buyer answered "YES" to 12.d.2. the transferor/seller must record the type of documentation showing the exception to the prohibition and attach a copy to this ATF Form 4473. (See Instructions for Question 18.c.)

**Questions 19, 20, or 21 Must Be Completed Prior To The Transfer Of The Firearm(s) (See Instructions for Questions 19, 20 and 21.)**

19.a. Date the transferee's/buyer's identifying information in Section A was transmitted to NICS or the appropriate State agency:  
 Month 7 Day 2 Year 20

19.b. The NICS or State transaction number (if provided) was:  
101HJZTXX

19.c. The response initially (first) provided by NICS or the appropriate State agency was:  
 Proceed     Delayed [The firearm(s) may be transferred on \_\_\_\_\_ if State law permits (optional)]  
 Denied  
 Cancelled

19.d. The following response(s) was/were later received from NICS or the appropriate State agency:  
 Proceed \_\_\_\_\_ (date)     Overturned  
 Denied \_\_\_\_\_ (date)  
 Cancelled \_\_\_\_\_ (date)  
 No response was provided within 3 business days.

19.e. (Complete if applicable.) After the firearm was transferred, the following response was received from NICS or the appropriate State agency on: \_\_\_\_\_ (date).  
 Proceed     Denied     Cancelled

19.f. The name and Brady identification number of the NICS examiner. (Optional)  
 \_\_\_\_\_ (name)    \_\_\_\_\_ (number)

19.g. Name of FFL Employee Completing NICS check. (Optional)  
 \_\_\_\_\_

20.  No NICS check was required because a background check was completed during the NFA approval process on the individual who will receive the NFA firearm(s), as reflected on the approved NFA application. (See Instructions for Question 20.)

21.  No NICS check was required because the transferee/buyer has a valid permit from the State where the transfer is to take place, which qualifies as an exemption to NICS. (See Instructions for Question 21.)

Issuing State and Permit Type	Date of Issuance (if any)	Expiration Date (if any)	Permit Number (if any)

**Section C - Must Be Completed Personally By Transferee/Buyer**

If the transfer of the firearm(s) takes place on a different day from the date that the transferee/buyer signed Section A, the transferee/buyer must complete Section C immediately prior to the transfer of the firearm(s). (See Instructions for Question 22 and 23.)

I certify that my answers to the questions in Section A of this form are still true, correct, and complete.

22. Transferee's/Buyer's Signature \_\_\_\_\_ 23. Recertification Date \_\_\_\_\_

Transferor/Seller Continue to Next Page  
 STAPLE IF PAGES BECOME SEPARATED

**Section D - Must Be Completed By Transferor /Seller Even If The Firearm(s) Is Not Transferred**

24. Manufacturer and Importer (If any) (If the manufacturer and importer are different, the FFL must include both.)	25. Model (If Designated)	26. Serial Number	27. Type (See Instructions for Question 27.)	28. Caliber or Gauge
1. <i>Ruger</i>	<i>Wramflo</i>	<i>200-90541</i>	<i>Revolver</i>	<i>.22</i>
2.				
3.				
4.				

**REMINDER - By the Close of Business Complete ATF Form 3310.4 For Multiple Purchases of Handguns Within 5 Consecutive Business Days**

29. Total Number of Firearms Transferred (Please <i>handwrite</i> by printing e.g., zero, one, two, three, etc. Do not use numerals.)	30. Check if any part of this transaction is a pawn redemption. <input type="checkbox"/> Line Number(s) From Question 24 Above:
<i>0AR</i>	<input type="checkbox"/>
31. For Use by Licensee (See Instructions for Question 31.)	32. Check if this transaction is to facilitate a private party transfer. <input type="checkbox"/> (See Instructions for Question 32.)
	<input type="checkbox"/>

33. Trade/corporate name and address of transferor/seller and Federal Firearm License Number (Must contain at least first three and last five digits of FFL Number X-XX-XXXXX.) (Hand stamp may be used.)

*ADCC FIREARMS, LLC  
6081 MONROE ST  
SYLVANIA, OH 43560*

*4-34-01728*

**The Person Transferring The Firearm(s) Must Complete Questions 34-37.  
For Denied/Cancelled Transactions, the Person Who Completed Section B Must Complete Questions 34-36.**

I certify that: (1) I have read and understand the Notices, Instructions, and Definitions on this ATF Form 4473; (2) the information recorded in Sections B and D is true, correct, and complete; and (3) this entire transaction record has been completed at my licensed business premises ("licensed premises" includes business temporarily conducted from a qualifying gun show or event in the same State in which the licensed premises is located) unless this transaction has met the requirements of 18 U.S.C. 922(c). Unless this transaction has been denied or cancelled, I further certify on the basis of — (1) the transferee's/buyer's responses in Section A (and Section C, if applicable); (2) my verification of the identification recorded in question 18 (and my re-verification at the time of transfer, if Section C was completed); and (3) State or local law applicable to the firearms business — it is my belief that it is not unlawful for me to sell, deliver, transport, or otherwise dispose of the firearm(s) listed on this form to the person identified in Section A.

34. Transferor's/Seller's Name (Please print)	35. Transferor's/Seller's Signature	36. Transferor's/Seller's Title	37. Date Transferred
<i>Steve Thompson</i>	<i>[Signature]</i>	<i>Sales</i>	<i>7-2-20</i>

**NOTICES, INSTRUCTIONS, AND DEFINITIONS**

**Purpose of the Form:** The information and certification on this form are designed so that a person licensed under 18 U.S.C. 923 may determine if he/she may lawfully sell or deliver a firearm to the person identified in Section A, and to alert the transferee/buyer of certain restrictions on the receipt and possession of firearms. The transferor/seller of a firearm must determine the lawfulness of the transaction and maintain proper records of the transaction. Consequently, the transferor/seller must be familiar with the provisions of 18 U.S.C. 921-931 and the regulations in 27 CFR Parts 478 and 479. In determining the lawfulness of the sale or delivery of a rifle or shotgun to a resident of another State, the transferor/seller is presumed to know the applicable State laws and published ordinances in both the transferor's/seller's State and the transferee's/buyer's State. (See ATF Publication 5300.5, *State Laws and Published Ordinances*.)

Generally, ATF Form 4473 must be completed at the licensed business premises when a firearm is transferred over-the-counter. Federal law, 18 U.S.C. 922(c), allows a licensed importer, manufacturer, or dealer to sell a firearm to a non-licensee who does not appear in person at the licensee's business premises only if the transferee/buyer meets certain requirements. These requirements are set forth in section 922(c), 27 CFR 478.96(b), and ATF Procedure 2013-2.

After the transferor/seller has completed the firearms transaction, he/she must make the completed, original ATF Form 4473 (which includes the Notices, General Instructions, and Definitions), and any supporting documents, part of his/her permanent records. Such Forms 4473 must be retained for at least 20 years and after that period may be submitted to ATF. Filing may be chronological (by date of disposition), alphabetical (by name of purchaser), or numerical (by transaction serial number), as long as all of the transferor's/seller's completed Forms 4473 are filed in the same manner.

**FORMS 4473 FOR DENIED/CANCELLED TRANSFERS MUST BE RETAINED:** If the transfer of a firearm is denied/cancelled by NICS, or if for any other reason the transfer is not completed after a NICS check is initiated, the licensee must retain the ATF Form 4473 in his/her records for at least 5 years. Forms 4473 with respect to which a sale, delivery, or transfer did not take place shall be separately retained in alphabetical (by name of transferee) or chronological (by date of transferee's certification) order.

If the transferor/seller or the transferee/buyer discovers that an ATF Form 4473 is incomplete or improperly completed after the firearm has been transferred, and the transferor/seller or the transferee/buyer wishes to correct the omission(s) or error(s), photocopy the inaccurate form and make any necessary additions or revisions to the photocopy. The transferor/seller should only make changes to Sections B and D. The transferee/buyer should only make changes to Section A and C. Whoever made the changes should initial and date the changes. The corrected photocopy should be attached to the original Form 4473 and retained as part of the transferor's/seller's permanent records.

**Exportation of Firearms:** The State or Commerce Departments may require a firearms exporter to obtain a license prior to export. **Warning:** Any person who exports a firearm without proper authorization may be fined not more than \$1,000,000 and/or imprisoned for not more than 20 years. See 22 U.S.C. 2778(c).

**Section A**

The transferee/buyer must personally complete Section A of this form and certify (sign) that the answers are true, correct, and complete. However, if the transferee/buyer is unable to read and/or write, the answers (other than the signature) may be completed by another person, excluding the transferor/seller. Two persons (other than the transferor/seller) must then sign as witnesses to the transferee's/buyer's answers and signature/certification in question 14.

# Order #23850 details

Payment via Cash on July 2, 2020 @ 7:36 pm.

## General Details

## Billing details

Address: No billing address set.

Email address:

Phone:

## Shipping details

Address: No shipping address set.

Ruger Wrangler SN:20090541 stock-9930

\$150.00<sup>x</sup><sub>1</sub> \$150.00\$10.88

22 50rd box Aguila Yellow Ammo

\$5.00<sup>x</sup><sub>2</sub> \$10.00 \$0.73

Discount: \$0.00  
Shipping: \$0.00  
Tax: \$11.60  
Order total: \$171.60

