

IN THE COURT OF COMMON PLEAS  
OF LUCAS COUNTY, OHIO

E. ELAINE ROEBKE, :  
ADMINISTRATOR OF THE ESTATE :  
OF ALLISON ROEBKE, :  
 : Case No: CI22-2926  
Plaintiff, :  
 :  
v. : Judge Navarre  
 :  
ADOC FIREARMS, LLC, et al., :  
 :  
Defendants. :

- - -

ZOOM DEPOSITION OF DANNY MEADOWS

- - -

Date taken: Friday, January 19, 2024  
Time: 9:00 a.m.  
Court Reporter: Vicki L. Plant

- - -

GLASS CITY REPORTING, LLC  
405 Madison Avenue, Suite 930  
Toledo, Ohio 43604  
419-241-2070  
Info@glasscityreporting.com

I N D E X

Deposition of DANNY MEADOWS:

	Page/Line	
EXAMINATION By MR. BAHRET.....	4	16
EXAMINATION By MR. JOHNSON.....	30	15
EXAMINATION By MR. COOPER.....	43	21
REEXAMINATION By MR. BAHRET.....	51	11

- - -

E X H I B I T S

	Page/Line	
PLAINTIFF'S EXHIBIT A MARKED.....	50	13
PLAINTIFF'S EXHIBIT B MARKED.....	51	1

- - -

O B J E C T I O N S

Entered by	Page/Line	
MR. COOPER.....	8	14
MR. COOPER.....	9	3
MR. COOPER.....	10	21
MR. COOPER.....	21	10
MR. COOPER.....	29	16
MR. COOPER.....	42	8
MR. COOPER.....	43	1

- - -

1 APPEARANCES:

2 On behalf of the Plaintiff:

3 COOPER ELLIOTT:

4 C. Benjamin Cooper  
5 305 W. Nationwide Blvd.  
6 Columbus, Ohio 43215 614-481-6000

7 On behalf of Defendant ADCO Firearms, LLC:

8 ROHRBACHER TRIMBLE & ZIMMERMAN, CO., L.P.A.:

9 Robert J. Bahret  
10 405 Madison Avenue, 8th Floor  
11 Toledo, Ohio 43604 419-248-2600

12 On behalf of Defendant Stephen Thompson:

13 D. LEE JOHNSON & ASSOCIATES:

14 D. Lee Johnson  
15 2927 N. McCord Road, Suite 100  
16 Toledo, Ohio 43615 888-413-0959

17 Also Present: Steve Thompson  
18 Elaine Roebke  
19 Paul Roebke

20 - - -

21  
22  
23  
24  
25

1 DANNY MEADOWS,  
2 being first duly sworn, as hereinafter certified,  
3 testified and said as follows:

4 MR. BAHRET: Ben, usual stipulations  
5 plus that the reporter can issue the oath  
6 remotely?

7 MR. COOPER: Yes. I'm not sure I  
8 know what the usual stipulations are.

9 MR. BAHRET: We just say that. It's  
10 waiver of any defects and notice,  
11 stipulate to the qualifications of the  
12 reporter, and she can transcribe it  
13 outside the presence of the witness. And  
14 that's pretty much it.

15 MR. COOPER: Yes, those are fine.

16 EXAMINATION

17 BY MR. BAHRET:

18 Q Could you state your full name for us, sir?

19 A Danny Ray Meadows.

20 Q And it is Danny, it's not Daniel?

21 A No, it's Danny is the real name, I go by Dan  
22 sometimes, but Danny is the real legal name.

23 Q My name is Bob Bahret, and I'm an attorney and I  
24 represent Mr. Thompson and ADCO Firearms. As we go  
25 through this as Vicki said, it's important we don't

1 talk at the same time. If you don't understand  
2 anything I'm saying, please don't guess, just say,  
3 Bob, I need you to clear that up, and it's my job  
4 to do so, okay?

5 A Yes, sir.

6 Q And even though I see you on the screen, use words  
7 to express your answer, all right?

8 A Understood.

9 Q I assume you've testified before?

10 A I have.

11 Q About how many times?

12 A As a law enforcement officer, probably several  
13 hundred times, as an expert or consultant, probably  
14 only three times, four depositions, but three  
15 cases.

16 Q Have you ever testified in a case involving an  
17 alleged straw purchase?

18 A I have not testified, no, sir.

19 Q I've got a CV that I assume you prepared, it's  
20 dated October of 2023; is that the most recent CV  
21 you have?

22 A At that time at the production of that, it would  
23 have been, there have been an updated version as of  
24 1 of '24 because I attended a few other classes at  
25 that time, and there was one administrative change

1 to the version that you've got.

2 Q Any of these additional classes that you have  
3 attended, have anything to do with a straw  
4 purchase?

5 A Not in regards to a straw purchase, however, a  
6 timeline for the gun range, for Niagra Gun Range is  
7 different.

8 Q I'm not sure what you're telling me; is that  
9 relevant to this case?

10 A It would be if you're going to ask questions about  
11 my processes of selling guns.

12 Q Are you involved in the sale of guns?

13 A Currently, no.

14 Q Were you ever?

15 A Yes.

16 Q When?

17 A The exact timeline would have been October of  
18 2012. I believe your version has October, 2013  
19 until June of 2014.

20 Q And so you have less than one year of experience  
21 in gun sales?

22 A October of 2012 to 2014, I believe would be over a  
23 year.

24 Q Give me those years again, October of 2012 to when  
25 in 2014?

1 A June of 2014.

2 Q Tell me a little more about that. What was your  
3 involvement in gun sales during those months?

4 A I was working for the Niagra Gun Range in North  
5 Tonawanda, New York. I had several different  
6 positions, but I worked at that location, but I was  
7 active in gun sales at that location. Handguns,  
8 shotguns, long guns, rifles, AR platforms.

9 Q You didn't own the establishment?

10 A No, sir, I did not.

11 Q Were you licensed at that time?

12 A I was not.

13 Q So have you ever been licensed to sell firearms  
14 anywhere?

15 A Negative, no.

16 Q What materials did you review for this case?

17 A There was a deposition by a Mr. Jerry Zohn, there  
18 was a deposition by Mr. Stephen Thompson, there was  
19 several I think up to about 12 pages, I could be  
20 wrong on that, that were put out by the local  
21 police department, detective's unit, I guess first  
22 responding officers to the scene, and there was the  
23 ATF Form 4473 as Pages 1, 2, and 3 for Mr. Jerry  
24 Zohn.

25 Q Did you interview anybody?

1 A I have not, sir.

2 Q Have you ever in your life spoken to  
3 Stephen Thompson?

4 A No, sir, I have not. Not that I'm aware of, we'll  
5 put it that way.

6 Q Would you agree that based on your report that  
7 you're essentially discounting Mr. Thompson's  
8 testimony?

9 A That I'm discounting his testimony? I'm doing it  
10 based on -- no, I don't believe I'm discounting his  
11 testimony, no.

12 Q You obviously are forming conclusions that are  
13 contrary to his testimony, correct?

14 MR. COOPER: Object to form.

15 A Yes, I would disagree with what he had to say,  
16 yes.

17 Q Why, what do you base that on?

18 A Based on information that I read in his  
19 deposition.

20 Q Be a bit more specific. What did he say in his  
21 deposition that gives you a basis to disbelieve his  
22 testimony about what went on during the gun sale?

23 A Based on, you know, we can go in more particulars  
24 later on, but based on things like strange dynamic  
25 in that, that was part of his testimony on the



1 deposition on strange dynamics.

2 Q Do you have a clue, any clue at all --

3 MR. COOPER: Hold on. Objection. I  
4 don't think Mr. Meadows is finished  
5 answering your question.

6 Q I thought he was finished, but go ahead if there  
7 was more to it.

8 A When you look at strange dynamics, that's what he  
9 reported in that, I believe that was also  
10 communicated to a law enforcement officer in a  
11 follow-up investigation by that department.

12 Q Do you have any clue at all as to what he meant by  
13 that?

14 A It was very limiting in what he put in that  
15 deposition that day, it was very limiting I think  
16 what he put in the report to the law enforcement  
17 officer of that day. I can't speak for the mindset  
18 of Mr. Stephen Thompson at that time.

19 Q Are you aware of the age difference between  
20 Mr. Zohn and Allison Roebke?

21 A I'm not sure what that has to do with anything,  
22 but obviously there was an age difference.

23 Q In your mind would a substantial age difference be  
24 a strange dynamic?

25 A It could be a strange dynamic. I mean, I've been

1 on the reverse side of that. My wife is ten years  
2 older than I am, there's a strange dynamic there  
3 if you want to look at that.

4 Q Did you interview the police to find out anything  
5 about the sales history of ADCO Firearms?

6 A Sir, I have not spoke to any of that law  
7 enforcement agencies or officers at this time.

8 Q Did you do anything to investigate that issue,  
9 what the reputation of ADCO Firearms is in the  
10 community?

11 A I did nothing along that line, no, sir.

12 Q Do you have any information that would support a  
13 belief that ADCO Firearms has ever been accused of  
14 being involved in a straw purchase before?

15 A I have no information regarding that.

16 Q Your report, I'm looking for the date, it says  
17 submit date October 8, 2023; is this the only  
18 report you've authored for this case?

19 A That is.

20 Q Were there any prior versions of this report?

21 MR. COOPER: I'm going to object to  
22 that. That's protected under Rule 26(b).  
23 You are not to answer that question,  
24 Mr. Meadows.

25 MR. BAHRET: Ben, I take exception to

1                   that, but we may take that up with the  
2                   court.

3                   MR. COOPER:            Bob, just to be clear,  
4                   let me put it in the record what the  
5                   specific rule cite is. I'm objecting  
6                   under 26(b)(7)(f). Thank you.

7                   MR. BAHRET:            I guess we may or may  
8                   not take that up with the judge later, but  
9                   you instructed him not to answer?

10                  MR. COOPER:            Correct. That rule  
11                  states drafts of any report provided by  
12                  any expert regardless of the form in which  
13                  the draft was recorded is protected by  
14                  Provision B(4) of this rule.

15                  MR. BAHRET:            I didn't ask him what  
16                  was in the version, I just asked if there  
17                  were earlier versions, and I don't think  
18                  that answer is protected, which is why I'm  
19                  disagreeing with you.

20                  MR. COOPER:            I understand.

21                  Q        Do you intend to do anything further in support of  
22                  your opinions, Mr. Meadows?

23                  A        I haven't been asked up to this point. If asked  
24                  at a later date, I may, but at this particular  
25                  point, I would advise, no.

1 Q Did you review the deposition transcripts of  
2 Allison Roebke's parents?

3 A I did not, sir.

4 Q Do you have any opinions that are not expressed in  
5 this six-page report?

6 A This report is based upon my observation of the  
7 different depositions such as that that was given  
8 to me, the information that was given to me, the  
9 reports that I've already outlined. I'm not giving  
10 anything the beyond the scope of what this report  
11 has to offer.

12 Q In this report you obviously conclude that  
13 Allison Roebke handled the gun in the store,  
14 correct?

15 A I did.

16 Q You understand that Mr. Thompson says that is not  
17 true?

18 A I understand that as part of his deposition.

19 Q But yet you choose to believe Mr. Zohn over  
20 Mr. Thompson on that point, correct?

21 A I have and, yes.

22 Q Why?

23 A Based on the information that was put out by  
24 Mr. Zohn, I concluded that was the most reasonable  
25 conclusion to come up with. He was there with her,

1 he was interacting with her at that time.

2 Q You have no information other than what Mr. Zohn  
3 says on that issue, correct?

4 A None that I'm aware of, no, sir.

5 Q And you also choose to believe that Allison handed  
6 money to Mr. Thompson even though Mr. Thompson says  
7 that is not true?

8 A That is correct. Based on the deposition  
9 testimony of Mr. Jerry Zohn.

10 Q A convicted felony?

11 A I'm not sure he was a convicted felon at that  
12 time. I don't know his background, sir.

13 Q He was convicted of a felony not long after  
14 Allison committed suicide, so that was well before  
15 his deposition testimony. Do you know anything  
16 about his, Mr. Zohn's background?

17 A Not other than, you know, some of the stuff that  
18 was put in the deposition, not really, no, sir. I  
19 don't know Mr. Zohn, I really don't know about his  
20 background.

21 Q In your report, you talk about helper signals;  
22 what's that?

23 A Helper signals would be something to the effect  
24 like if there was two or three parties that were  
25 involved, two or three people pointing at maybe a

1 firearm, maybe making eye contact about things, you  
2 go into body language when you do that, but things  
3 like asking certain questions about it, and an over  
4 interested viewpoint or over interested in a  
5 particular firearm or just making certain comments  
6 from one party to the next.

7 Q Do you know if any of that took place?

8 A I'm not 100 percent sure if any of that took place  
9 or not.

10 Q You mentioned body language signals in your  
11 report, what's that?

12 A Body language signals would be certain things like  
13 eye contact, based upon questions that may have  
14 been or not have been presented by Mr. Thompson in  
15 this case, whether eye contact was made, whether  
16 there was the rolling of eyes in relation to  
17 certain questions, in one direction versus another,  
18 whether there was certain indicators of hand  
19 signals around the mouth or over interested, being  
20 leaning and being part of the conversation more  
21 intently or lesser, by stepping away from it and  
22 not being interested in what's being said. Those  
23 are some.

24 Q Do you know if any of that happened?

25 A I have no idea whether it was or not, sir.

1 Q You also mentioned gut feeling in your report;  
2 what is that?

3 A Gut feeling would be something that I teach almost  
4 on a weekly basis and everything that I do in my  
5 current position, but I teach gut feelings for  
6 enhancement of my own personal feeling about  
7 something, someone else's personal feeling about  
8 something, what you believe to be odd, unusual, not  
9 normal, something that would send up red flag  
10 signals, something that I would as a detective or  
11 something I'd done in the past, or ask more  
12 questions or change my line of questioning  
13 accordingly to try to look for the response that  
14 I'm trying to gather.

15 Q Do you know if any of that took place in this gun  
16 sale?

17 A I have no idea.

18 Q Do you know how many times Mr. Thompson has  
19 stopped sales of guns when he thought something was  
20 fishy?

21 A I'm unfamiliar with that, sir, no.

22 Q Do you have any idea how many times Mr. Thompson  
23 has called the Sylvania police to report a  
24 suspicious sales attempt?

25 A I have not researched that, no, sir.

1 Q Do you know how long Mr. Thompson has been a  
2 licensed firearm seller?

3 A I have no clue on that, no idea.

4 Q Do you have any idea how long ADCO Firearms has  
5 been in business?

6 A No, I do not.

7 Q Do you have any idea how many gun sales he has per  
8 year on average?

9 A I do not.

10 Q In your report you talk about these things that we  
11 just went through, the helper signals, body  
12 language, those things, and you do conclude that  
13 some of that did take place even though you just  
14 told me you had no idea?

15 A Could you reference what page please, I don't have  
16 mine open; and what number and page please.

17 Q For some reason the page numbers when I printed  
18 this report, I think it's on Page 4, but the number  
19 didn't print.

20 A How about the corresponding numbers beside it  
21 please.

22 Q Thirteen.

23 A Thank you very kindly, if I may review.

24 Q Sure.

25 A Okay.



1 Q What helper signals are you referring to in  
2 Number 13 here on Page 4?

3 A I do not have the depositions with me at this  
4 time, I have the report only. I would have to  
5 refer to that to dig in, but I'm referring to  
6 Mr. Jerry Zohn's deposition, what was indicated in  
7 his deposition.

8 Q On 13B you talk about indifference of the sale;  
9 who was indifferent about the sale of this gun?

10 A I would again have to refer to that deposition  
11 from Mr. Jerry Zohn.

12 Q So you don't know if that's referencing Mr. Zohn  
13 or Allison Roebke?

14 A Respectfully, sir, again, I would have to refer to  
15 the deposition as put out by Mr. Jerry Zohn.

16 Q What questioning signals in Point 13C are you  
17 talking about?

18 A Again, I would refer to the deposition that was  
19 put out by Mr. Jerry Zohn in order to respond to  
20 your question.

21 Q Under 13B, you point to the failure of  
22 Mr. Thompson to use what is known as his gut  
23 instinct during the transaction; what did he do  
24 wrong?

25 A I believe he explained, both in his deposition and

1 to the law enforcement officers who investigated  
2 this crime something regarding a strange dynamic,  
3 that in my opinion is a gut feeling that you should  
4 further challenge or be further investigated.

5 Q The fact that Mr. Zohn and Allison Roebke were at  
6 least 40 years difference in age. I think you  
7 already told me that in and of itself could be a  
8 strange dynamic, correct?

9 A It could be.

10 Q You don't know what Mr. Thompson was referencing  
11 when he suggested there was a strange dynamic  
12 between this couple?

13 A I don't think there was anything that I read  
14 either in the statement as put forward to the law  
15 enforcement officer nor in his deposition that he  
16 expressed any more beyond those wordings.

17 Q You are aware of the fact that the police took  
18 no action against ADCO Firearms or against  
19 Mr. Thompson, correct?

20 A You've just informed me of that at this time, but  
21 I'm unaware of any actions that were taking place.

22 Q Other than they pursue Mr. Zohn?

23 A I know Mr. Zohn was pursued, I think that was in  
24 his deposition. I think the law enforcement got  
25 involved in it, I don't recall which agencies,

1           whether ATF was involved in that or not. I'd have  
2           to refer back to that deposition.

3       Q     ATF was involved and they charged him with a  
4           felony in Federal court.

5       A     Okay.

6       Q     By the way, do you take the position that  
7           Allison Roebke could not have purchased that gun  
8           herself?

9       A     I would be unable to advise that. She  
10           unfortunately is deceased, I read no deposition  
11           from a deceased subject, so I would be unable to  
12           respond to that accordingly.

13      Q     Do you know if she was qualified to purchase a gun  
14           legally?

15      A     I have no idea.

16      Q     That's not part of your expertise?

17      A     I'm not a mental health expert in that area.

18      Q     Are you aware of the fact that Mr. Zohn lied in  
19           more than one area on that 4473 form?

20      A     In respect to a straw purchase under 18 USC 932, I  
21           think he would have been several times that he lied  
22           on that. That's pretty apparent, I think he was  
23           arrested as you informed me.

24      Q     One of the things he lied about was who the  
25           ultimate user of the gun was to be, correct?

1 A That would be indicative of a straw purchaser,  
2 sir.

3 Q And another thing he lied about was his address,  
4 correct?

5 A I have no idea on the address quite honestly.  
6 I've had several addresses of recent, so I don't  
7 know which would be the correct address.

8 Q You're supposed to give the address where you  
9 reside, correct?

10 A You're supposed to.

11 Q Are you aware of the fact that he did not provide  
12 that information accurately?

13 A I have no idea what his current address was at the  
14 time of sale.

15 Q Are you aware of the fact that there was a  
16 restraining order against him pursuant to his  
17 divorce?

18 A I think I read something regarding a divorce in  
19 there, I really didn't focus on some divorce or a  
20 restraining order accordingly.

21 Q Are you aware of the fact that if he had admitted  
22 there was a restraining order against, he could not  
23 legally purchase the gun; are you aware of that?

24 A I don't know the laws of your particular state,  
25 especially with restraining laws of your state,

1           so I would not be able to advise on that  
2           accordingly.

3       Q     Your report under Point 16 suggests over interest  
4           in the subject firearm by Allison Roebke; what do  
5           you base that on?

6       A     Based on the information as obtained from the  
7           deposition as put out by Mr. Jerry Zohn.

8       Q     So again, on that issue you choose to disbelieve  
9           the sworn testimony of Mr. Thompson?

10                   MR. COOPER:            Objection, form. Go  
11                   ahead.

12       A     I think both gentlemen gave what in their opinions  
13           were sworn testimony at the time, I chose to go  
14           with this particular one as the basis for what I  
15           put my opinions together for.

16       Q     Why did you choose the version supplied by  
17           Mr. Zohn over the version supplied by Mr. Thompson?

18       A     Based upon the review of Mr. Thompson who was  
19           there working in concert with Ms. Allison Roebke,  
20           that's the one I went with.

21       Q     I guess I'm asking why because what Zohn said on  
22           that subject and what Mr. Thompson said on that  
23           subject were dynametrically opposed, correct?

24       A     I believe so. I believe I also understand that  
25           just as in this particular proceeding that we're

1 going through now, Mr. Stephen Thompson was in  
2 presence in that particular interview, that  
3 deposition, and then his deposition was laid later.  
4 So I don't know what would be factual or wouldn't  
5 be factual in response to his deposition.

6 Q I guess what I'm getting at is how is it that  
7 you're supposedly offering an expert opinion, but  
8 all you seem to be doing is choosing to believe one  
9 person over another?

10 A I read all of the information that was provided to  
11 me, and this is the opinion that I came up with,  
12 sir.

13 Q Other than the fact that you could choose to  
14 believe Zohn over Thompson, what do you base it  
15 on?

16 A My reasonable degree of professional certainty  
17 based on the information that was presented to me,  
18 and the evaluation of that information and the  
19 opinions that were put forward by me.

20 Q In Point 18 of your report, you seem to suggest  
21 that Mr. Thompson was selling the firearm to  
22 Allison Roebke; do you have any information  
23 whatsoever to back up that comment on?

24 A I believe again, sir, that's going to be based  
25 upon the information I retrieved from Mr. Jerry

1 Zohn's deposition.

2 Q Even Mr. Zohn doesn't say that. He said he  
3 purchased it, and then gave the gun later to  
4 Allison; you're aware that that's his version,  
5 correct?

6 A I believe that is his version. Again, I don't  
7 have that in front of me and be able to express  
8 beyond that without my review of it, I would not be  
9 able to advise that at this time.

10 Q You're aware that if a straw purchase is taking  
11 place, the alleged purchaser would want to do  
12 everything possible so that the shopkeeper or the  
13 salesman wouldn't tumble to the information that,  
14 hey, this guy isn't really the one buying the gun;  
15 they would want to keep that act up, correct?

16 A I've seen a number of attempted straw purchases in  
17 my time of selling guns. I've known signals, seen  
18 signals, listened to conversations, investigated  
19 conversations, stuff like that. I don't know in  
20 this particular case if he was trying to carry on  
21 the act or not and to what degree he was. I was  
22 not there, I'm going based upon the testimony at a  
23 deposition by Mr. Jerry Zohn.

24 Q You know that Mr. Zohn testified that he did  
25 everything he could to make it seem like he was the

1 purchaser of the gun; he said that under oath,  
2 right?

3 A And they do this.

4 Q That's the norm when somebody is trying to do a  
5 straw purchase is to proceed with the act, right?

6 A I don't know what the norm is, and based upon your  
7 definition of norm, I really couldn't advise on  
8 that.

9 Q On Point 16 of your report you talk about a lack  
10 of interest displayed by Jerry Zohn. Mr. Zohn  
11 did not ever say that, in fact, nobody has said  
12 that, so where do you come up with that conclusion  
13 that he had a lack of interest in the sale of this  
14 gun?

15 A I do not know how actively he was involved in it.  
16 I know based upon Mr. Stephen Thompson's  
17 involvement in it, that there were certain lines of  
18 questioning that were presented, but I don't know  
19 to what degree his involvement or lack of  
20 involvement would be accordingly.

21 If there was a greater involvement by most  
22 people, you know, if I want to use the term norm,  
23 then there's a greater degree of involvement in the  
24 sale of the gun. Then again if there is a lack of  
25 involvement in the gun, there would be a lesser



1 degree of involvement in the actual purchase of  
2 that gun.

3 Q Do you have any evidence that suggests a level of  
4 involvement of Mr. Zohn in this deal?

5 A Not in front of me at this time, no, sir.

6 Q Did you ever have that information?

7 A I would have to refer back to both Mr. Jerry  
8 Zohn's and Mr. Stephen Thompson's depositions to  
9 add further to that.

10 Q What did you do to prepare for this deposition?

11 A I read the reports, I read the depositions, I read  
12 the police report, I looked at the ATF Form 4473  
13 that was presented to me, and that's what I did to  
14 prepare for this particular event.

15 Now, in respect to some of that, I haven't  
16 looked at it in several weeks. I'm on the road,  
17 I'm traveling, I'm teaching. I have a report in  
18 front of me, that's about all I've got.

19 Q Are you aware of the term gun shows?

20 A Oh, yeah, absolutely.

21 Q And you're aware that at gun shows they don't use  
22 Form 4473; there is no background check?

23 A I'm not sure in regard to your particular state  
24 what they do or what they don't do. In some cases,  
25 they do and some cases they don't. Here in the

1 State of North Carolina, I've been to many gun  
2 shows, and I've seen numerous 4473s presented to  
3 people, but again, I don't know your particular  
4 state, that location of what they do or don't do  
5 for gun shows in the State of Ohio or whatever.

6 Q Every year at the Lucas County Rec Center, they do  
7 a gun show, and there are no background checks; are  
8 you aware of that?

9 A No, I'm not.

10 Q Is there reason why you didn't do anything to  
11 investigate the reputation of ADCO Firearms?

12 A I wasn't asked to do any investigation of it, I  
13 wasn't prompted or encouraged or given a duty or  
14 mission or responsibility to do any investigations  
15 on that.

16 Q Wouldn't that have been good to know what the  
17 reputation is?

18 A It depends on what the attorney team wants me to  
19 do.

20 Q I'm just asking you. If you're forming opinions  
21 in this case, wouldn't it be good to know what the  
22 reputation of ADCO Firearms is in the community and  
23 what that reputation is with the police?

24 A Generally, sir, as an investigator of many years,  
25 I've been known to investigate a lot, research a

1 lot, dig into it a lot. I do that for a number of  
2 different things that I've done in the past and  
3 currently do at this time, but again, I was not  
4 asked to research, go into review anything with  
5 respect to ADCO or Mr. Stephen Thompson.

6 Q By the way, when were you retained?

7 A I'm thinking somewhere around June of last year.  
8 I don't have that in front of me.

9 Q June of 2023?

10 A Yes, sir.

11 Q How many hours do you have into this project?

12 A I probably only have about ten hours into the  
13 project. I don't have my timesheet in front of  
14 me.

15 Q I think I saw somewhere in your report here,  
16 hourly rate is \$200 per hour?

17 A That's correct for anything involving  
18 pre-deposition or trial.

19 Q Do you have a different rate for deposition  
20 testimony?

21 A I do, sir, \$300 an hour.

22 Q In this case do you plan on coming to the trial?

23 A If I'm requested to do so, absolutely.

24 Q Where are you physically right now?

25 A I am in my office in Charlotte, North Carolina.

1 Q Do you live in Charlotte, North Carolina?

2 A I live in Connelly Springs, North Carolina.

3 Q Is that somewhere near Charlotte?

4 A It is about an hour-and-a-half away.

5 Q But your office is an actual office, and it's not  
6 a room in your house?

7 A No. I do have an office at my home, but this is  
8 not it. This is an actual office building, it's a  
9 suite, this is for Allied Universal Security  
10 Services, which I am a regional trainer for them.

11 Q What is the name of that company again?

12 A Allied Universal Security Services.

13 Q Are you the owner of that company?

14 A I am not, I wish I was.

15 Q How many companies are you currently affiliated  
16 with besides Allied?

17 A I mean, if you look at CTW Media Group, I do that,  
18 I've done Tap Three Times, group of companies,  
19 Tango3Global. I kind of do a little bit with that,  
20 but all of those are something that I do, I own  
21 accordingly.

22 Q I saw that you post something on the radio?

23 A I have.

24 Q What general topics on your radio show; what's  
25 that about?

1 A Depends on which one you're talking about.

2 Q Any of them deal with straw purchases?

3 A I may have talked about straw purchases on the  
4 Shooting Channel once upon a time. I've been doing  
5 that since about 2013, 2014 timeline,  
6 Shooting Channel radio show, podcast, TV production  
7 type thing with the Shooting Channel. I may have  
8 at one time. There's a lot of topics I've talked  
9 about over the years in regards to that, but  
10 probably very little in respect to straw purchases.

11 Q Have you ever been opposed as an expert witness by  
12 any court?

13 A Negative, sir, no, I have not.

14 Q Has anybody ever tried to exclude you as an expert  
15 to your knowledge?

16 MR. COOPER: Objection.

17 A No, sir, they have not.

18 (Recess taken.)

19 Q Mr. Meadows, when you reviewed these transcripts  
20 of depositions, were you given the entire  
21 transcript or just sections?

22 A I believe there were 85 pages in regards to  
23 Mr. Stephen Thompson, I believe there was 84 pages,  
24 and there were those small little check like  
25 things. Mr. Thompson was a full page, it was

1 presented to me, Mr. Jerry Zohn was -- I forget how  
2 you all describe it, but the smaller little page  
3 segments that they've got. I think that was 84 to  
4 86 pages, to include word phrases page, that was  
5 associated to that in regards to the depositions.

6 Q So it's your impression then that you had the  
7 entire transcripts for both of them?

8 A Except for any word phrases at the end of  
9 Mr. Thompson's, I believe I got all of them.  
10 Again, I think it was approximately 85 pages for  
11 Mr. Thompson.

12 MR. BAHRET: I'm going to turn you  
13 over to Mr. Johnson, sir. Thank you.

14 - - -

15 EXAMINATION

16 BY MR. JOHNSON:

17 Q Good morning, Danny.

18 A Good morning, sir.

19 Q My name is Lee Johnson, I represent  
20 Stephen Thompson on a personal basis. I have  
21 a couple of questions for you.

22 A Please.

23 Q First and foremost, do you hold yourself out as an  
24 expert?

25 A I have held myself out as an expert or expert

1 consultant for a number of years, yes.

2 Q In what area do you hold yourself out as an  
3 expert?

4 A In relation to guns, malfunction of guns,  
5 crossbows, crossbow injury cases, range safety,  
6 firearms training, use of force, officer involved  
7 shootings, security related in relation to  
8 training, in relation to use of force that's gone  
9 on with that, officer use of training,  
10 administrative areas for like the presentation of  
11 policies and procedures. I think that pretty much  
12 covers it all.

13 Q You would agree with me that at least as far as  
14 the law is concerned, an expert would be somebody  
15 who possesses perhaps superior education, training,  
16 and experience that might make an otherwise  
17 difficult situation for jurors to understand, and  
18 you might be able to better explain; would you  
19 agree with that?

20 A It is my understanding that that would be correct,  
21 but it depends on what you are describing or  
22 defining as superior education.

23 Q Fair enough. Education and training, let's do  
24 that first, and then I'll come back to the  
25 question. What is your educational background?

1 A I have mostly technical training, military law  
2 enforcement, criminal justice training from a  
3 number of different universities or colleges that  
4 I've gone to.

5 Q I'm sorry to interrupt, just for brevity. Let's  
6 go with your criminal justice; do you possess a  
7 Bachelor's degree from any accredited university?

8 A I do not.

9 Q So then it goes without saying you don't possess a  
10 Master's degree or any advanced degree from any  
11 accredited college, correct?

12 A No, only an honorary degree from my Academy of  
13 Martial Arts and Sciences in respect to martial  
14 arts training and such over the years.

15 Q I'm going to confine my comments as it pertains  
16 to this case, Allison Roebke and my client,  
17 Stephen Thompson, and Mr. Bahret represents ADCO.  
18 So expert wise in this case, are you considering  
19 yourself an expert as to testify as to anything  
20 regarding the wrongful death or the allegation of  
21 wrongful death of Allison Roebke?

22 A The wrongful death in relation to the sale of a  
23 firearm, yes. As far as anything beyond the scope  
24 of the sale of the firearm that she used in respect  
25 to taking her own life, it's just in response to



1 that.

2 Q What expertise in this case do you bring to the  
3 table because I'd like to examine your expertise  
4 because I heard you talk about martial arts, I  
5 heard you talk about security guard training, I've  
6 heard you talk about use of force; none of those  
7 things pertain in this case, agreed?

8 A What was the last, I'm sorry?

9 Q Everything that you told me. You told me that  
10 you're range officer; none of that applies,  
11 correct?

12 A Correct, I'll answer your question to that.

13 Q Appreciate that. So specifically, and I'm trying  
14 to listen and wrote down everything that you said.  
15 What expertise do you bring to this case; that's  
16 what I'm asking you specifically?

17 A Been involved in firearms since the 1960's, 1966  
18 most particularly, been involved in the training  
19 and teaching of others of armed over the years, I  
20 have information and training and teaching  
21 capabilities with respect to the range safety and  
22 such as that, but I've been involved in teaching  
23 others over the years, use of body language, use of  
24 gut feelings, and stuff of that. I've been --

25 Q I'm sorry to cut you off, but back to my question.

1 MR. COOPER: Lee, just to be fair, I  
2 think he was continuing to try to answer  
3 your question.

4 Q Okay. Sir, Attorney Cooper has made a good point.  
5 So go ahead, tell me how your expertise lends to  
6 this case?

7 A I've been in a, you would probably say more  
8 limiting than maybe Mr. Stephen Thompson, but I've  
9 been involved in gun sales for a period of time  
10 since the timeline of October of 2012 up to October  
11 of 2014. During that timeline, I had probably  
12 anywhere between 1,000, 1,200 transactional sales  
13 that I either did primarily or assisted others that  
14 worked at that particular location. I've  
15 interviewed people who were getting guns, who were  
16 purchasing guns, separated them out, talked about  
17 different things, got them away from one another to  
18 try to make a determination as to what it was that  
19 they were looking for, qualify them to the  
20 particulars of a gun, and then whether or not those  
21 gut feelings kicked in or not.

22 Q Let's cover some of that territory. Allied  
23 Universal Security is a security guard service,  
24 true?

25 A It is the largest security contractor in the

1 world, yes, sir.

2 Q Are you aware of the class action suit brought  
3 against Allied Universal?

4 A I'm sure there's several that are out there.

5 Q Did you have anything to do with that; did you  
6 testify?

7 A I have not.

8 Q You would agree that the security guard service,  
9 Allied, they're not police officers, they're  
10 security guards, correct?

11 A That is incorrect, they do employ police officers.  
12 I just finished teaching two police officers  
13 firearm training this past week. They have a  
14 company police program.

15 Q What was the caliber of gun Allison Roebke used to  
16 kill herself?

17 A It was a .22-caliber, it was a Wrangler, a  
18 six-shot. It appeared to be based on the  
19 information, I would say, I don't know the size of  
20 the barrel or anything. It was a .22-caliber, I  
21 think it was a six-shot, but it was a .22-caliber  
22 in size as far as the grain weight of the bullet.

23 Q Did you look at the results from the ATF  
24 investigation?

25 A I haven't seen that. I've only seen the reports

1 as put out by the law enforcement division that  
2 investigated this incident.

3 Q I asked specifically about ATF?

4 A No, sir, I haven't seen anything they did.

5 Q I'll quote, went back to firearm used, seized the  
6 weapon used, they did a report; did you review  
7 that?

8 A I did not.

9 Q Did you review the results of the search warrant  
10 from the Verizon text messages?

11 A I only seen initial. I don't recall that, no,  
12 sir.

13 Q Would that be of interest to know the  
14 communication that went back and forth between  
15 Jerry Zohn and Allison Roebke?

16 A If it was presented to me, I may find it of  
17 interest at that time, but I haven't reviewed it.

18 Q When you talk about obvious age difference, what  
19 was the age difference between Allison Roebke and  
20 Jerry Zohn?

21 A I don't recall offhand without having the  
22 information in front of me.

23 Q Did you ever see any post-mortem photographs of  
24 Allison Roebke?

25 A I have none that I've reviewed.

1 Q Prior to her death, could you describe  
2 Allison Roebke's physical presence; what did she  
3 look like?

4 A No, sir.

5 Q Could you describe Jerry Zohn's physical presence;  
6 have you ever seen him or seen photographs of  
7 Jerry Zohn?

8 A No, sir, I have not.

9 Q You've made many, many assertions of, quote,  
10 strange dynamics, which I assume you lifted off of  
11 a police report; is that accurate?

12 A I read it off of a police report and out of a  
13 deposition.

14 Q And you said you are familiar because you've sold  
15 guns for approximately a year-and-a-half; do you  
16 know what a Form 4473 is?

17 A I do.

18 Q By the ATF?

19 A I do.

20 Q Have you reviewed the form that Jerry Zohn filled  
21 out to purchase a gun from ADCO?

22 A There was only three pages, yes, sir, I did.

23 Q You do feel confident to tell me what was on that  
24 form, correct?

25 A If you ask specifics about certain things on that,

1 I couldn't advise you, I don't have it. And I have  
2 the report in front of me and that's it.

3 Q Do you feel that Jerry Zohn legally purchased the  
4 firearm from ADCO?

5 A Based on what the investigative process that that  
6 followed afterward, based on the information I read  
7 in the depositions, it doesn't appear that it was a  
8 legal purchase of the firearm.

9 Q How so?

10 A I'm doing it based on the investigation of what  
11 was written into the depositions, that he was  
12 arrested, that kind of thing. I only have what was  
13 presented to me. I don't have any documentation  
14 from ATF or anything along those lines that  
15 displays that. You look at the ATF Form 4473, I  
16 mean, I know his name was on it, I know he filled  
17 out portions of it, I know Mr. Stephen Thompson  
18 filled out certain portions of it based on  
19 signature, based on transaction numbers or  
20 something like that. That's all I know.

21 Q Are you suggesting that Stephen Thompson did  
22 anything wrong during the completion of the  
23 Form 4473 filled out by Jerry Zohn to purchase the  
24 .22-caliber Ruger?

25 A With the Form 4473?

1 Q Yes, that's my question.

2 A No, I don't see anything wrong with the Form 4473,  
3 no, sir.

4 Q Do you opine as to any mistakes or misstatements  
5 that Jerry Zohn made on the Form 4473?

6 A I wouldn't know as respectful to Mr. Bahret,  
7 Mr. Bahret mentioned something to the effect that  
8 there was an address that wasn't correct on it such  
9 as that. I wouldn't know anything. Again, I don't  
10 know the address, I don't know what Jerry Zohn did  
11 other than he billed himself out as being the  
12 purchaser of that gun, which turned out to be a  
13 straw purchase.

14 Q I don't want to really focus on the address, what  
15 I want to focus on you're making mention of  
16 depositions, which is, of course, after the fact of  
17 the point of sale, true?

18 A Yes.

19 Q Please confine my question to the actual point of  
20 sale itself, specifically on the Form 4473, and my  
21 question is: Do you take any issue with anything  
22 that either Jerry Zohn or Stephen Thompson  
23 completed, signed, or attested to on that form at  
24 point of sale?

25 A I see that they both entered information based on

1           what I'm reading, both entered information into it.  
2           I think that it was a completed form up to Page 3  
3           of that form, I think that was a 2016 version of  
4           the ATF form at that time. I know there's changes  
5           to the newer version, but there's only three pages  
6           associated with that. It looks like they both  
7           signed off on it, looks like there was a  
8           transaction number done. If there was a  
9           transaction number done, there would have been a  
10          NICS background check done at that time.

11        Q    So again the question, if we could put a binary  
12            yes or no, and I'll break it down for you, so it's  
13            not a compound question. Did Stephen Thompson do  
14            anything improper on the Form 4473 during the  
15            transaction of the sale of the Ruger .22-caliber to  
16            Jerry Zohn?

17        A    To my recollection after reviewing that  
18            previously, I do not see anything that he done that  
19            was incorrect on it. So my answer would be, no,  
20            there was nothing done incorrect on it as per  
21            Mr. Stephen Thompson.

22        Q    Is it your opinion that Jerry Zohn did anything  
23            wrong, provided false information, or didn't  
24            accurately portray the answer to his questions on  
25            ATF Form 4473 at the point of purchase at ADCO when



1 he purchased the 22-caliber Ruger?

2 A I see nothing based on the ATF Form 4473. I see  
3 nothing that would have been placed on there by  
4 Jerry Zohn that would have been incorrect or  
5 anything like that. I think he listed his name, he  
6 listed an address on there, he signed off on it  
7 that he was the purchaser.

8 Q I want to understand your expert testimony in this  
9 case if you are confirming that neither  
10 Stephen Thompson or Jerry Zohn did anything wrong  
11 during the point of purchase of the .22-caliber in  
12 the ADCO Firearms store, and we know through the  
13 police reports and prior testimony in this case  
14 history, at some point later Allison Roebke took  
15 her own life; do you know how many days after the  
16 point of purchase that Allison took her life by the  
17 way?

18 A I think it was based upon, I would say, yes, but I  
19 think it's based upon the information that I got  
20 off of the police report. It was either five or  
21 six days after, the 7th or 8th, somewhere along  
22 that line. I believe the purchase was made on the  
23 2nd, so it would have been the 7th or 8th that the  
24 reports were made by law enforcement. I think they  
25 put a timeline on it, I don't know the actual

1 timeline, but I believe it was the 7th, but I'm not  
2 sure, of 2020.

3 Q I'm not sure I agree with your date. If there was  
4 no problem with the sale from ADCO to Jerry Zohn,  
5 then we are left with Jerry Zohn's conduct of  
6 giving his lawfully purchased firearm to  
7 Allison Roebke, correct?

8 MR. COOPER: Object to form.

9 Misstates prior testimony.

10 A In respect to the form, the form appeared in its  
11 entirety, appeared to be filled out and completed  
12 by both Mr. Jerry Zohn, Mr. Stephen Thompson. I  
13 can only attest that that particular transaction as  
14 far as the information that was on that form  
15 appears to be a correct version, a full version  
16 based on the 2016 ATF form that was used in that  
17 particular case. In relation to anything else  
18 prior to or afterwards, I would have to take a  
19 direct question on that.

20 Q And that's what I'm trying to get. I'm trying to  
21 establish what you already told me. There's no  
22 problem with the point of sale, and now we have  
23 gone through the chronology that approximately six  
24 days passed before the sale to the death of Roebke  
25 approximately, correct?

1 MR. COOPER: Object to form. Go  
2 ahead.

3 A Approximately.

4 Q Do you know when or do you opine when  
5 Allison Roebke took possession of the purchased  
6 Ruger from ADCO?

7 A I do not.

8 Q Can you tell me or do you have an opinion as  
9 to after the point of sale, what control  
10 Stephen Thompson would have had as it pertained  
11 to Zohn and Roebke, either legally or your opinion  
12 and theory?

13 A I have no opinion on that or legal theory in  
14 response to that.

15 MR. JOHNSON: Let me check my notes  
16 real quick. Thank you, Danny, for your  
17 answers. I don't have anything further.

18 MR. BAHRET: I don't have any  
19 follow-up.

20 - - -

21 EXAMINATION

22 BY MR. COOPER:

23 Q Mr. Meadows I've got some questions for you. Just  
24 to be clear, you were asked or it was stated rather  
25 by Mr. Johnson that in describing your testimony,

1 quote, that you had no problem with the point of  
2 sale. What I want to do is ask you about  
3 Paragraph 6 of your report.

4 A Please go ahead.

5 Q There's several parts to the beginning of that,  
6 and then the last part of that says, it is my  
7 opinion that Stephen Thompson missed, overlooked,  
8 or ignored key signals, key questioning, and key  
9 straw purchaser observances that should have  
10 alerted him that the sale on July 2nd of 2020  
11 should not have been made; did I read that  
12 correctly?

13 A You did, sir.

14 Q First of all, is that your opinion to a reasonable  
15 degree of professional certainty?

16 A It is my opinion.

17 Q Can you explain why please?

18 A I've been involved in gun sales before, and  
19 understanding the program put out by the National  
20 Shooting Sports Foundation, ATF, Department of  
21 Justice, the -- I can't remember -- the community  
22 program that's put out by the DOJ, such as that.  
23 The Don't Lie for the Other Guy is to educate both  
24 the gun seller, things to look out for, helper  
25 signals, body language signals, gut feelings such

1 as that.

2 And it's a training program with them to do  
3 better in trying to not allow or get guns out into  
4 the community, general public, for them to either  
5 commit a crime or do other things that they may  
6 want to be doing with that gun. In this particular  
7 case, a seller should have recognized, especially  
8 one who may have been in the business for years,  
9 one who may have sold guns for a number of years,  
10 and whatever like that, dealt with many  
11 transactions over the years, dealt with NICS  
12 background checks when they came out, and such.

13 That these are things that regardless of the  
14 timelines of when they were sold, regardless of  
15 inventory side or such like that, the advent of  
16 COVID or whatever along that line. People are  
17 subjected to -- you're trying to educate the  
18 seller, you also try to educate people.

19 I don't know if Mr. Thompson's shop that day,  
20 what signage he may have had posted in there, what  
21 communications that he had had in relation to  
22 Mr. Zohn, in relation to Ms. Roebke, whether he  
23 sent certain questions out to him. Sensed signals  
24 that he didn't describe in his deposition, just  
25 along that line.

1                   When you look at straw purchaser warning  
2 signs, when you look at things that are out there,  
3 even seasoned people, people who are veterans of  
4 selling guns and stuff like that over a period of  
5 time. Sometimes complacency kicks in. I don't  
6 know if that's the case in this particular case,  
7 but sometimes it does, I teach of that often.

8   Q    You were asked about the 4473 form and what  
9        Mr. Zohn filled out, and you talked about Mr. Zohn  
10       fully filling out the form; do you recall that?

11   A    I do.

12   Q    In response to Mr. Bahret's questions, do you  
13        recall Mr. Zohn included some information on the  
14        form that was incorrect; were you aware of that?

15   A    As per Mr. Bahret, yes.

16   Q    What do you understand that information to be?

17   A    From what I recall, unless further review is  
18        needed, what I recall is that there was an address  
19        that was incorrectly placed on to that document.

20   Q    Who does the form indicate is the ultimate  
21        purchaser?

22   A    Jerry Zohn.

23   Q    What is your understanding of who the ultimate  
24        purchaser truly was?

25   A    It's going to be Allison Roebke.

1 Q What is that understanding based on?

2 A Based on Jerry Zohn's relationship, in respect to  
3 friend relationship, whatever it may have been, but  
4 the conversations that were held between the two,  
5 his attendance along with her to the gun shop, I  
6 believe twice, that same gun shop twice, in a given  
7 timeline, basics of the inter activities between  
8 the two people, this Roebke and Mr. Zohn.

9 Q Just to be clear, I don't think you were asked  
10 directly, do you in your expert opinion have a  
11 quote/unquote problem with the sale of this  
12 firearm?

13 A I have concerns that certain things were missed, I  
14 have concerns that certain questions may not have  
15 been asked, I have concerns that helper signals or  
16 body language or whatever or the inter activities  
17 of the two, Mr. Zohn and Ms. Roebke, was missed,  
18 either on the first or second occasion of their  
19 attendance to that particular gun shop.

20 I think that further investigation should have  
21 been done from the gun seller, I think other  
22 questions should have been asked, and whether they  
23 were or not, well, that's maybe for a jury to  
24 decide.

25 Q Why is it that reasonable gun sellers are supposed

1 to do the things that you talked about?

2 A To keep them from having them get in trouble with  
3 the ATF or to pay a fine. I don't know what the  
4 full adjudication would be in respect to that, but  
5 pay fines, be suspended, have their license  
6 revoked, whatever, that would be of concern. If  
7 I was a gun shop owner, I would be concerned of  
8 that.

9 Q In addition to the concerns to the gun seller, are  
10 there any other concerns that in your experience  
11 that exist, either to the public at large or to  
12 others?

13 A I mean, you want to a gun seller and maybe others,  
14 it's a different society now than it used to be  
15 years ago, people were more concerned about their  
16 communities and such as that.

17 I've been a Second Amendment supporter for  
18 years, but yet when you have guns out on the  
19 streets that doesn't need to be there, guns that  
20 could be used for a variety of different reasons  
21 other than for target practice, other than for  
22 self-defense and such as that, you have to be  
23 concerned for the community at large.

24 Q In your expertise and background, what are some of  
25 the things that a straw purchaser would likely use



1 a firearm for?

2 A For people who could not make that sale because  
3 they have a background where they were adjudicated  
4 as a felon at the time prior to the process of  
5 purchasing that, attempts to use that gun in some  
6 type of criminal activity, some type of criminal  
7 act that is out there. Maybe to use it, you know,  
8 I've been investigating a number of things over the  
9 years, maybe use it to shoot and kill someone else,  
10 and it wouldn't be tied to them, it would be a  
11 homicide that might be involved with it. I could  
12 probably go on.

13 Q Mr. Meadows, is one of the things that -- strike  
14 that.

15 Mr. Meadows, do reasonable gun sellers know  
16 that one of the things that a straw purchase can be  
17 used for is suicide?

18 A That would be part of it as well, yes, sir.

19 Q Why is that your opinion?

20 A I've investigated suicides before, I've  
21 investigated sisters one year apart. They both  
22 purchased a gun, and one day they turned around and  
23 used it the next day on themselves. One year apart  
24 they committed suicide with guns. I've  
25 investigated suicides with guns on that. So

1 looking at a person, looking at how they are  
2 interacting with you, maybe answering questions of  
3 you, are they nervous acting, are they appearing to  
4 be, you know, and I would say, I'm not a medical  
5 professional in that respect, but are they acting  
6 strangely, or are they acting out, are they  
7 communicating, talking to themselves, whatever like  
8 that. It could be a number of different things, do  
9 they look distraught such as that, so for a  
10 reasonable person to ask questions who is a gun  
11 seller. I think that could be very much a part of  
12 it as well.

13 (Plaintiff's Exhibit A marked.)

14 Q Let me mark as Exhibit A to this deposition your  
15 October 8, 2023, report, which I believe is a  
16 six-page document. Exhibit A, is this your report  
17 that you authored in this case?

18 A Sir, I'm unable to see it. Can you hold it up; do  
19 you have a hard copy of that? That would be the  
20 only way I can see that.

21 Q How about this?

22 A That would be my report that I submitted to you.

23 Q Six pages, that's the final page there?

24 A Yes, sir, electronic signature. Yes, sir, that's  
25 my report.

1 (Plaintiff's Exhibit B marked.)

2 Q And Exhibit B, this is your CV that's dated  
3 October, 2023?

4 A That is a version I presented to you, yes, sir.  
5 Can I see the last page please?

6 Q Seventeen pages?

7 A Yes, sir, that would be it.

8 MR. COOPER: Thank you, I don't have  
9 any other questions.

10 - - -

11 REEXAMINATION

12 BY MR. BAHRET:

13 Q In follow-up, Mr. Meadows, you certainly have no  
14 information to suggest that Stephen Thompson knew  
15 or should have known that Allison Roebke would  
16 eventually use that gun to commit suicide,  
17 correct?

18 A Only based upon the testimony that I've been given  
19 so far, based upon the information I've reviewed  
20 thus far, I would have to probably agree with what  
21 you're saying at this time.

22 Q Very good.

23 MR. BAHRET: Ben, what's your  
24 preference on signature?

25 MR. COOPER: Lee, are you okay; do

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

you have any other questions?  
MR. JOHNSON: I have nothing further,  
I have no further questions.  
MR. COOPER: He'll read and sign.  
Thank you.  
(Deposition concluded at 10:24 a.m.)

DANNY MEADOWS

- - -

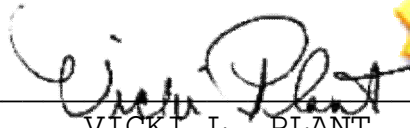

1 C E R T I F I C A T E

2 STATE OF OHIO )  
3 ) SS.  
4 COUNTY OF LUCAS )

5 I, Vicki L. Plant, Court Reporter and  
6 Notary Public for the State of Ohio, do hereby certify  
7 that DANNY MEADOWS was by me first duly sworn; that the  
8 testimony given was reduced to stenotype; that the  
9 foregoing is a true and correct transcript of the  
10 testimony so given; that this deposition was taken at  
11 the time and place in the foregoing caption specified.

12 I do further certify that I am not a  
13 relative, employee, or attorney of any of the parties  
14 or counsel employed by the parties hereto or  
15 financially interested in this action, nor am I or the  
16 court reporting firm with which I am affiliated under a  
17 contract as defined in Civil Rule 28(D).

18 IN WITNESS WHEREOF, I have hereunto set my  
19 hand and affixed my notarial seal of office at Toledo,  
20 Ohio, this 11th day of February, 2024.

21   
22 VICKI L. PLANT  
23 Notary Public in and for the  
24 State of Ohio  
25 

My Commission expires August 17, 2026.