

Exhibit 5

In The Matter Of:

*Shawn J. Tardy, et al. vs.
Martin J. O'Malley, et al.*

Lucy Allen

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Gore Brothers Reporting & Videoconferencing

20 South Charles Street, Suite 901

Baltimore, MD 21201

410-837-3027

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1 rounds of ammunition fired by individuals using
2 a gun in self-defense, what did you do?

3 A. The specific analysis that's described
4 and the findings that are described in my report
5 come from a coding, a quantification of all the
6 stories that were contained in a -- the NRA
7 maintains a database of stories of people
8 defending themselves. And so we looked through
9 all of those stories in a recent time period and
10 in addition looked for new stories describing
11 the same event and counted up how many rounds
12 were reported to have been fired by the
13 individuals defending themselves.

14 Q. Of all the sources of information in
15 the world on this subject, why did you choose
16 the NRA stories?

17 A. They had a large database of stories of
18 people defending themselves. We looked for
19 other sources of information for people
20 defending themselves and this was the most
21 comprehensive source that we found.

22 Q. Are you familiar with the work of
23 Dr. Kleck, K-l-e-c-k?

24 A. Yes.

25 Q. And he has gone directly to certain

1 any peer reviewed --

2 Q. Or that any peer review journal has
3 ever gone through the process of reviewing the
4 analysis done and the study made and approving
5 it from a peer review point of view, that hasn't
6 been done to your knowledge, correct?

7 A. I don't know if anyone has done that or
8 not.

9 Q. And is the same true with respect to
10 the Citizens Crime Commission study as well?

11 A. I don't know.

12 Q. And the same with respect to the mayor
13 study that you referred to, as far as you know,
14 that hasn't gone through a peer review process
15 for an academic journal?

16 A. I don't know. I don't believe it has.

17 Q. All right. On Page 8, the carryover
18 paragraph, last full sentence, you state: "We
19 updated the data on shots fired for mass
20 shootings in 2013 where available." What does
21 that mean? What did you do?

22 A. When -- I have to see if this said the
23 same thing. So Mother Jones -- we did an
24 analysis for New York, for the same data for
25 New York, and at that point, Mother Jones had no