

EXHIBIT F

In The Matter Of:

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

Daniel Webster, ScD.

January 17, 2014

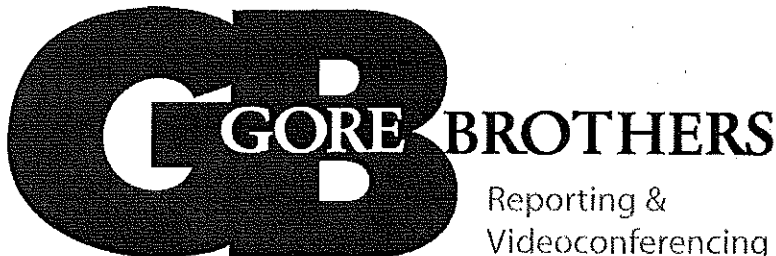
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1 Q All right. Is there a field for -- well,
2 let me start.

3 What is the database that this data
4 reflects?

5 A This is data on incidents identified by
6 Mother Jones through, principally, news accounts of
7 incidents in which four or more people were killed with
8 a firearm in a public place by a lone shooter.

9 Although the lone shooter, I subsequently
10 discovered is not always the case in, at least, a
11 couple of these.

12 Q All right. How many cases are reflected in
13 this data?

14 A Incidents?

15 Q Yes.

16 A I don't know off the top of my head, but I
17 can -- I think I might have put it in the report. I'm
18 sorry. I know it's in here. Sixty-two, yes, 62.

19 Q And of those how many involved assault
20 weapons have been banned by the State of Maryland?

21 A I don't know for sure.

1 Q Can you even hazard a guess?

2 A The information provided in this database
3 wasn't always complete on some of them, so I'm not
4 certain.

5 Q Well, when I went through and looked at
6 them I only found five or six, do you have a different
7 number when you look at it?

8 A That's -- that's probably close. Um,
9 others, you know, involve guns with large-capacity
10 magazines.

11 Q Well, let's just focus on so called assault
12 rifles for a moment?

13 A Sure.

14 Q Let's assume it's approximately five or
15 six, and there's some confusion about what exactly is
16 within the definition in Maryland, but let's assume
17 it's five or six; is that a disproportionate
18 representation of assault weapons in this data base of
19 mass shootings?

20 MR. FADER: Objection.

21 A Disproportionate, um, it would all depend

1 you know, about the most extreme anti-social act one
2 can think of, okay. So you -- you -- you have
3 variability in the weapon that they choose and,
4 although they all are trying to do mass harm.

5 Q In your report you start out on Page 2 in
6 talking about the design and capability of firearms and
7 I believe this focuses very specifically on the issue
8 you just talked on, am I correct?

9 A Yes.

10 Q Did you do any original research for your
11 report?

12 A Principally the only thing I did was
13 examine the trends just to get an understanding of the
14 general temporal pattern for the number of incidents
15 and the number of individuals shot or killed in public
16 mass shootings, that's -- that's the lone analysis that
17 I did. As well as drawing upon available research.

18 Q And when you talk about the trends that you
19 studied would that be the Mother Jones database?

20 A Yes.

21 Q Okay. You would agree with me that of all

1 Q And other than the -- the Koper studies
2 what other studies are you aware of that are out there
3 on those two areas?

4 A Well, there is a recent study that -- that
5 came out in, it was in an economic letters journal,
6 that is very -- not very well described, nor in my
7 opinion carried out the study. I think I made
8 reference to it, I should have brought the article
9 itself. It just -- I just learned about it really in
10 the past week.

11 Q We marked as Webster 12 --

12 A Yes.

13 Q -- Professor Gius report?

14 A Yeah. So he -- he published something that
15 just came out in Applied Economic Letters, in which he
16 looks at gun murder rates 1980 to 2009 and looks at the
17 association between gun laws, particularly the assault
18 weapon restrictions.

19 And -- and he finds that, if I remember
20 correctly, that there was a harmful effect, I believe,
21 with -- with -- he said -- found that state level gun

1 murder rates were higher during the federal assault
2 weapon ban.

3 "State level assault weapons ban had no
4 statistically sufficient effects on state level gun
5 related murder rates." Um, and that state level gun
6 related murder rates were higher during the period in
7 question of '94 to 2004.

8 Um, so what -- what this analysis failed to
9 consider is just how different the states are that
10 adopt these type of policies from those that don't, and
11 how the underlying trends differ between states that
12 adopt the laws and those that don't.

13 And that is why I think he also generated
14 estimates of protective effects of right to carry laws
15 that the most rigorous research has found to be quite
16 flawed. And so I -- I don't have any faith at all that
17 the -- on -- in the estimates generated from this
18 modelling strategy that's already been demonstrated to
19 have great weaknesses.

20 Q Do you agree that the gun related murder
21 rate is the crime rate most effected by gun control