

1 IN THE CIRCUIT COURT OF MISSOURI  
2 JACKSON COUNTY, DIVISION 10  
3 HONORABLE PATRICK W. CAMPBELL

4 ALVINO CRAWFORD, et al., )  
5 )  
6 Plaintiffs, )  
7 )  
8 vs. ) No. 1916-CV17245  
9 )  
10 JIMENEZ ARMS, INC., et al., )  
11 )  
12 Defendants. )

13 TRANSCRIPT OF PROCEEDINGS

14 On Friday, November 13, 2020, the above cause came  
15 on for hearing before the HONORABLE PATRICK W.  
16 CAMPBELL, Judge of Division 10 of the above court at  
17 Kansas City, Missouri.

18 A P P E A R A N C E S

19 For the Plaintiffs: Ryan Gerber  
20 Molly Thomas-Jensen  
21 Everytown Law  
22 450 Lexington Ave.  
23 P.O. Box 4184  
24 New York, NY 10017

25 Eric L. Dirks  
Williams Dirks Dameron, LLC  
1100 Main St., Ste. 2600  
Kansas City, MO 64105

Julie M. Del Percio, Certified Reporter #516  
Official Court Reporter, Division 10  
Sixteenth Judicial Circuit of Kansas City

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

FRIDAY, NOVEMBER 13, 2020

THE COURT: Good afternoon. Court calls 1916-CV17245, Alvino Crawford vs. Jimenez Arms, James Samuels, et. al. Appearances for the record.

MR. DIRKS: Good afternoon, Your Honor. For the plaintiffs we have Eric Dirks. And I'll just state for the record, and I think you can see them, we have Beverly and Alvino Crawford, our clients.

MR. GERBER: Good afternoon, Your Honor. Ryan Gerber on behalf of the plaintiffs.

MS. THOMAS-JENSEN: And good afternoon, Your Honor. Molly Thomas-Jensen on behalf of the plaintiffs.

THE COURT: All right. Let me clean up the screen here a little bit. We have JCDC, which is the Jackson County Department of Corrections, which probably called in mistakenly. Anybody there from Jackson County Department of Corrections?

(No audible response.)

THE COURT: I'm moving you to the lobby. And we have an 816 call in. Who is calling in on an 816 area code phone?

1 MS. SAMUELS: That would be Connie Samuels.

2 THE COURT: All right. On or about  
3 September 1st, 2020, the plaintiff filed a motion  
4 for default judgment against the defendant James  
5 Samuels. That motion was heard on or about  
6 October 15th, 2020, and at that time with regard  
7 to the issues of liability the Court entered a  
8 default judgment against defendant James Samuels  
9 and set the matter over for a damages hearing  
10 today.

11 Mr. Dirks, is the plaintiff ready to proceed  
12 with regard to damages?

13 MR. DIRKS: We are, Your Honor. And  
14 Mr. Gerber will be calling Mr. Crawford first, I  
15 believe.

16 THE COURT: All right. Mr. Gerber, you may  
17 call your first witness.

18 MR. GERBER: Your Honor, just before we call  
19 the witness, we submitted exhibits to Your Honor  
20 by email. May we have those admitted beforehand  
21 or would you like them to admit them as we go  
22 along?

23 THE COURT: The Court has looked at those  
24 exhibits. I'll go ahead and admit Exhibits A  
25 through I. Exhibits A through I will be

1 admitted.

2 MR. GERBER: Thank you, Your Honor. I'm  
3 actually going to turn it over to my colleague  
4 Molly Thomas-Jensen, who is going to call Beverly  
5 Crawford to the stand.

6 THE COURT: All right. Ms. Thomas-Jensen.

7 MS. THOMAS-JENSEN: Thank you. I would like  
8 to call Beverly Crawford to testify.

9 THE COURT: Ms. Crawford, if you would raise  
10 your right hand.

11 BEVERLY CRAWFORD,  
12 having been sworn by the Court testifies as follows:

13 THE COURT: You may inquire.

14 MS. THOMAS-JENSEN: Thank you, Your Honor.

15 DIRECT EXAMINATION

16 BY MS. THOMAS-JENSEN:

17 Q. Ms. Crawford, can you tell the Judge why you  
18 are here testifying today?

19 A. I'm here today testifying on behalf of my  
20 son Alvino Dwight Crawford.

21 Q. And can you tell the Judge a little bit  
22 about yourself today?

23 A. Yes. My name is Beverly Crawford, like I  
24 said. I'm married. I have three children, three  
25 adoptive children, which is six altogether. I have

1 three grandchildren. I'm married to Alvino Crawford.  
2 I am a Christian. I am employed at a day care, love  
3 children. That's about it.

4 Q. Can you tell us how you came to adopt  
5 Dwight?

6 A. Yes. My husband and I, like I said, I have  
7 two older adult daughters. We could not conceive a  
8 son right then. We were getting up in age, too. So  
9 just saw on TV, it was a show called The Black  
10 Adoption, that came on after the news and it was  
11 showing different children on black adoption.

12 We were interested. We talked about it. We  
13 inquired more about it. We went through our home  
14 study and within that week we talked with the social  
15 worker and she brought a little boy in, which was  
16 three years old. At the time his name was Dwight. We  
17 fell in love with Dwight. Dwight came and stayed the  
18 weekend.

19 Just a cute black kid, curious, he laughed  
20 all the time. He had a really sneaky laugh. We fell  
21 in love with him during that weekend. We inquired  
22 more about him. And his rights -- his mother's  
23 parental rights were terminated. We found out that he  
24 was up for adoption. We fell in love with him and the  
25 rest is history. We adopted him. He was three years

1 old.

2 Q. What was Dwight like as a child?

3 A. He was a jokester. He loved football. He  
4 loved board games. He loved playing videos. He loved  
5 wrestling, watching the wrestling. He was a happy kid  
6 pretty much.

7 Q. And was he close to his sisters?

8 A. Yes.

9 Q. All right. I'd like to show you the photo  
10 that we've marked as Exhibit D. Do you have that pdf?

11 A. Yes.

12 Q. Can you tell us about this photograph?

13 A. This photograph is the first picture that we  
14 as a family took together. This picture was when the  
15 girls -- well, they took a picture with Dwight. This  
16 is the first photograph of him. This is the outfit  
17 that I had bought -- first outfit that I bought him,  
18 which is what -- I wanted to have him as a little  
19 baby, keep him as a baby. He was much older than this  
20 outfit that he had on.

21 Q. How did Dwight change as he grew older?

22 A. Still a jokester, he still loved playing  
23 football, he always had a dream that he wanted to  
24 become a football player. He loved to draw really  
25 well. As he got older, he started wondering more

1 about his biological family. He had an interest in  
2 finding them. He found his grandma. We kept in  
3 contact with her, you know, just trying to keep each  
4 other abreast of what was going on in his life.

5 Q. And did you see him on holidays and  
6 birthdays once he was an adult?

7 A. Yes. Yes. We as a family, we have a huge  
8 family, and we love barbecues, coming together for  
9 holidays, birthday parties, you know. On a Saturday,  
10 let's just get together and let's have a cook out. So  
11 we were at the park at different family meals. Our  
12 church family also. He was a big part of our family.

13 Q. Can you me tell me about the photograph that  
14 is marked Exhibit B?

15 A. This is a photo of myself, my sister, and  
16 Dwight. And we were in the mall and I saw Dwight come  
17 in with his girlfriend. I could hear him at the mall,  
18 in the hallway at the mall. That looks like my momma.  
19 Is that my momma? Momma. And I turned around and  
20 there was Dwight. And so we were -- I just happened  
21 to, Come on, let's take a picture. So we took a  
22 picture. This is a picture of us together with my  
23 sister.

24 MS. THOMAS-JENSEN: Judge, did you have a  
25 question about the incident?

1                   THE COURT: No, we thought we missed a word,  
2                   the court reporter, but we've got it. Go ahead.

3                   Q.     (By Ms. Thomas-Jensen) Ms. Crawford, I'm  
4                   going to turn to the subject of Dwight's death. How  
5                   did you learn about Dwight's passing?

6                   A.     That morning -- I had a home day care and  
7                   the home day care, I had my grand baby, she was there.  
8                   She was ill. I called my daughter to tell her that  
9                   she was ill and she had to bring some medicine to me.  
10                  While she was there I heard a knock on my door. I  
11                  went to answer the door and there were two detectives  
12                  outside the door. And I'm thinking, you know, they  
13                  got the wrong house.

14                  There shouldn't be any police in front of my  
15                  house. So I'm like, Can I help you? I went to answer  
16                  the door, Can I help you? And he said, Could they  
17                  come in? I said, Sure, come on in. And they asked me  
18                  who I was and I told them. They asked me to take a  
19                  seat. You know, usually when they say that you know  
20                  that the news is not going to be good. It wasn't  
21                  really registering.

22                  I'm like, No, whatever you have to tell me,  
23                  tell me now. I'm not going to sit down. Just tell  
24                  me. So one of them told me that my son had been  
25                  murdered. And I'm in denial. I'm like, No, not my



1 son. Who are you talking about? So she identified  
2 him. I was asking her, you know, How do you know that  
3 it was my son? It could have been somebody with his  
4 wallet. How do you know? She said Well, you know,  
5 his I.D. matched his --

6 So that's how I found out. Still in denial.  
7 Pretty much after that it was just a blur really. I  
8 don't know. All I know is that there was another lady  
9 that came in. And I'm like, I don't even know how  
10 this lady came in, but she was in my house. And I  
11 mean, she held me and rocked me.

12 Come to find out, she was Mother's Against  
13 Murdered Children. How she found out about me at that  
14 moment at that time, I don't know. But I know she was  
15 a Godsend. Because it was just -- it was like a blur,  
16 you know. I was still in denial. I was, you know,  
17 arguing with the cop, No, it's not my son. You have  
18 the wrong child. Somebody stole his wallet.

19 Q. Can you tell us about Dwight's funeral?

20 A. I don't remember going into the service. I  
21 just remember me sitting in the church and I see him  
22 in the casket. He looked like he was asleep. His  
23 face was swollen. He had two big knots on his head.  
24 It was like he was missing -- it looked like they put  
25 a lot of makeup on him. As far as where his nose is,

1 it just looked disfigured.

2 I seen him just laying there with his hands  
3 crossed over. I seen the church full. I hear the  
4 music. I hear different ones getting up, talking  
5 about him. I hear his friends telling me how he took  
6 over and helped them with their children. I hear my  
7 husband up preaching the service. I hear my daughters  
8 crying. As I'm sitting in front of them, I can hear  
9 them crying. That's about it.

10 MS. THOMAS-JENSEN: I think I have no  
11 further questions for you at this time, Beverly.  
12 Thank you so much.

13 THE COURT: Mr. Gerber, any further evidence  
14 on behalf of the plaintiffs?

15 MR. GERBER: Your Honor, we would like to  
16 call Alvino Crawford to the stand.

17 THE COURT: Mr. Crawford, if you would raise  
18 your right hand.

19 ALVINO CRAWFORD,  
20 having been sworn by the Court testifies as follows:

21 THE WITNESS: I affirm.

22 THE COURT: All right. You may affirm. The  
23 witness has been sworn. Mr. Gerber.

24 DIRECT EXAMINATION

25

1 BY MR. GERBER:

2 Q. Good afternoon, Mr. Crawford.

3 A. Good afternoon.

4 Q. Can you tell us a little bit about yourself,  
5 please?

6 A. Sure. My wife said most of it. But I'm  
7 gainfully employed. I'm an associate pasture of my  
8 church and have been for probably 20 years or so. We  
9 do have a family. We have a very close family. Both  
10 my wife and I have both probably six, seven brothers  
11 and sisters. So a huge family, and very close, very  
12 close knit with one another.

13 Q. Can you tell us a little bit about Dwight's  
14 interests?

15 A. Sure. So as my wife said, Dwight was an  
16 avid football fan. He loved the Kansas City Chiefs.  
17 As he was growing up, I would place him -- I used to  
18 work with the Dallas Corporation (phonetic). So I'd  
19 have him with football teams that were supported by  
20 the corporation, and he played with a couple of teams.

21 The one that I can remember mostly was the  
22 Steelers, as he was named the most valuable player. I  
23 think I still have the award that he received. I  
24 think he was a safety. He was kind of small but  
25 stocky. As my wife said, he -- one thing I remember,

1 at my wife's home day care, Dwight would be able to  
2 look at a photo and draw it free hand and it would  
3 look just like the photo. It was a phenomenal talent  
4 that he had.

5 Q. You said he was a football fan. Was he a  
6 fan of any particular team?

7 A. He had to be a Kansas City Chiefs fan.  
8 Hometown fans, that's what we were. I'll share, and I  
9 don't know if the Court can see this. This was a  
10 football that -- my son would go to football camp  
11 sometimes. And one year in particular -- and you can  
12 see there's some autographs of some of the football  
13 players on it.

14 My son went to this camp and had some of the  
15 football players sign it. He gave this to me as a  
16 Christmas present, because as a family we would all  
17 exchange gifts. Besides obviously my wife and my  
18 relationship with Christ, this is probably one of the  
19 most cherished things that I have from my son.

20 Q. Thank you. So turning to Dwight's murder,  
21 can you please tell us how you learned that Dwight was  
22 murdered?

23 A. Sure. I was at work. I remember it well.  
24 My son, I talk to -- my birthday is July 3rd and he  
25 called me on July 4th just to check in, because we

1 always had family gatherings. He called and he asked  
2 what we were doing and he told me what his plans were.  
3 I said that's fine, Son. I'll see you a little bit  
4 later. He told me happy birthday and he was murdered  
5 the next day.

6 I was at work July 5th, I'll never forget,  
7 and I got a call from my oldest daughter. She said,  
8 Dad, come home, something happened to Dwight. At that  
9 moment I knew what had happened. I just knew. As a  
10 father I just knew. Rushed out, got home quickly, and  
11 cars were all there, and family was all distraught as  
12 I was as well.

13 I came in, as my wife said, to some support  
14 from the community. And probably one of the times of  
15 my life that I will obviously never forget and my  
16 birthday will never be the same because of the murder  
17 of my son.

18 Q. Mr. Crawford, can I ask you to please turn  
19 to Exhibit E, which is on page 11 of the exhibit  
20 packet.

21 A. (Witness complies.) Got it.

22 Q. Can you please tell me what this is a  
23 picture of?

24 A. It's a photo of my son, our son, who was  
25 murdered by a weapon that was illegally sold by this

1 defendant. You see the photo of my son. The picture  
2 unfortunately doesn't do justice to him because the  
3 gunshots that were used went to his -- through his  
4 head, through the side of his ear, and they shattered  
5 his brain, his skull. So it was kind of a socket was  
6 displaced. I can't think of the right word.

7           Unfortunately, you can't see how handsome he  
8 was. That photo describes not only a horrific crime,  
9 a loss, and I'll say this. No parent should ever have  
10 to bury their child, and even the defendant, I don't  
11 wish for him to lose a child to murder. I never would  
12 wish that on anybody, but because of his actions we  
13 don't have our son and that's a travesty.

14           Q. You mentioned that the gun was illegally  
15 trafficked. How does that impact you and your family?

16           A. Sure. So I'm a gun owner, and I don't have  
17 any concerns with the second amendment at all.  
18 However, as Christians and as a moral society, we have  
19 laws and individuals who break those should be held to  
20 an account. And even to the higher level people that  
21 are in higher positions, as this gentleman was, in  
22 leadership. They should be held to a higher standard,  
23 in my opinion.

24           I think that's the same perspective that we  
25 have in our society. So given the fact of the

1 position that he had and the decisions that he made of  
2 selling over 77 guns with minimal profit and not  
3 having any remorse is not only deplorable but it's  
4 disappointing, but we understand it. And again,  
5 that's one of the reasons why we've testified today in  
6 the fact that my son can't. So we stand in on his  
7 behalf.

8 Q. Mr. Crawford, how would your life be  
9 different if he was not killed, if your son was not  
10 killed with an illegally trafficked gun?

11 A. Any man I believe wants his name to be  
12 carried to the next generation. And obviously, when  
13 we lost my son, we gave him -- gave my son my name.  
14 And that died, the choice or the opportunity to have  
15 my name carried to another generation, died because of  
16 the actions of this defendant. Or have any  
17 grandchildren.

18 Q. Can I please direct your attention to  
19 Exhibit A, which is page 3 in the exhibit packet.

20 A. Yes.

21 Q. Can you please explain this picture, the  
22 significance to you?

23 A. Yes. We have a history in our family of  
24 taking family photos as you saw even when our children  
25 were very young. So we've done that on a regular

1 basis, not every year but regularly. This was a photo  
2 that we took I believe it was in 2003. It's a  
3 representation of our next generation. It's our two  
4 daughters and their sons and missing is our son.

5 My wife and I have been married almost 40  
6 years. Her parents were married 50 years or so. My  
7 parents were married almost 60 years. We have a  
8 history of longevity in our family and having married  
9 children to follow the generation. My son is missing  
10 from this.

11 My wife said this. When my son would be at  
12 home, I saw in him -- I saw in my son some of the  
13 values that we wanted. He would be taking care of the  
14 little girls' children. Their fathers, or excuse me,  
15 their children's fathers were not around. I know he  
16 would have been there for -- he would have been a  
17 great father.

18 MR. GERBER: Thank you, Mr. Crawford. No  
19 further questions at this time.

20 THE COURT: All right. Mr. Gerber, any  
21 further evidence by the plaintiff?

22 MR. GERBER: We have no further evidence. I  
23 have prepared a brief closing statement, which we  
24 know Your Honor is pressed for time and we would  
25 be willing to submit that by electronic filing if



1 Your Honor would prefer to do it that way.

2 THE COURT: How long is it, Mr. Gerber?

3 MR. GERBER: It's about two to three  
4 minutes, I believe.

5 THE COURT: Go ahead.

6 MR. GERBER: Your Honor, the testimony you  
7 heard today was nothing short of devastating.  
8 Beverly and Alvino Crawford are compassionate  
9 people of faith, outstanding community members,  
10 and loving parents. Their son Dwight did not  
11 have to die and the way that he died leaves an  
12 unfillable hole in their hearts and permanent  
13 turmoil in their minds.

14 We seek \$4 million in damages, not to fill  
15 this void but to recognize the value of Dwight's  
16 life, to punish the defendant for his callous  
17 behavior, and to deter gun trafficking in the  
18 future. We ask for \$2 million in compensatory  
19 damages and \$2 million in punitive damages.

20 Let's start with compensatory damages.  
21 Dwight was a healthy 29-year-old man when his  
22 life was cut short. Beverly and Alvino are also  
23 young and vibrant. Beverly is only --

24 (Reporter clarification.)

25 THE COURT: Hang on a minute. It's my

1 fault. You're talking too quickly for the court  
2 reporter and that's because I made you feel  
3 rushed. Please slow down a little bit. I'm  
4 going to give you time to provide your whole  
5 statement.

6 MR. GERBER: Thank you, Your Honor.

7 Dwight was a healthy 29-year-old man when  
8 his life was cut short. Beverly and Alvino are  
9 young and vibrant as well. Beverly is 59 and  
10 Alvino is 58. According to the actuary tables,  
11 they still have approximately 23 years of life  
12 left, hopefully much longer than that.

13 That's 23 years of not celebrating birthdays  
14 or holidays with Dwight. It takes from  
15 Mr. Crawford the ability to watch the Kansas City  
16 Chiefs with his son. That's 23 years of Mrs.  
17 Crawford not having Dwight and 23 years of taking  
18 a family Christmas photo with a hole in it.

19 \$2 million in compensatory damages is about  
20 90,000 per year, which doesn't begin to cover the  
21 loss they suffered but recognizes that Dwight's  
22 life had value. It's for the value of services,  
23 consortium, companionship, comfort, instruction,  
24 guidance, counsel, training, and support of  
25 Dwight Crawford and the pain that he suffered as

1 he passed away.

2 As they age, Dwight will not be able to help  
3 them around the house or offer other support.  
4 Dwight won't get to know his nieces and nephews.  
5 It's 23 years of heart break. As I said before,  
6 the \$2 million figure won't plug the hole in  
7 their heart but it recognizes the value of  
8 Dwight's life.

9 Now let's talk about punitive damages.  
10 First we ask the Court to take note of the plea  
11 agreement that was Exhibit I in the exhibit  
12 packet that James Samuels entered into with the  
13 federal government on federal gun trafficking  
14 charges. We also move the facts in the petition  
15 be deemed admitted through Mr. Samuels' default.

16 I'll be quoting from the case Call versus  
17 Heard, 925 S.W. 2d 840, the Missouri 1996 case.  
18 It says, Punitive damages are appropriate where  
19 the defendant showed complete indifference to or  
20 a conscious disregard for the safety of others.  
21 The purpose of punitive damages is to inflict  
22 punishment and to serve as an example and a  
23 deterrent to similar conduct.

24 We have met that standard here. James  
25 Samuels was a Kansas City fire fighter, a public

1           servant, tasked with protecting the community,  
2           but he inexplicably chose a path that lead to  
3           pain and destruction. He chose profit over  
4           Dwight's life.

5           Mr. Samuels bought the gun used to murder  
6           Dwight from Green Tip Arms on April 7, 2016. He  
7           never intended to keep this weapon, and indeed,  
8           only 23 days later on April 30, 2016, he went  
9           back to Green Tip Arms to transfer this weapon to  
10          Lesha Boles, one of several guns that he  
11          transferred to Ms. Boles.

12          Predictably and tragically 66 days later  
13          that gun was used to murder Dwight. And as you  
14          heard earlier today, this caused indefinite hurt  
15          and pain to the Crawford family. Make no mistake  
16          about it, Mr. Samuels had a callous disregard for  
17          human life when he chose to profit off of illegal  
18          gun trafficking.

19          He was caught as a part of an undercover  
20          investigation by the ATF after Dwight's murder  
21          knowingly selling a gun to a convicted felon,  
22          someone who in fact was close to Dwight's murder,  
23          and giving this convicted felon advice on  
24          creating a Molotov cocktail. This is callous  
25          disregard for human life.

1           In total James Samuels trafficked 77 guns,  
2           and one of the counts on which he defaulted was a  
3           public nuisance claim that recognizes the harm to  
4           the entire community that was caused by his gun  
5           trafficking. A \$2 million punitive damages award  
6           could hopefully deter similar conduct in the  
7           future.

8           To sum up, Beverly and Alvino Crawford's  
9           testimony here speaks for itself, and I will not  
10          try and rehash it, but I would like to add one  
11          final wrinkle to something that Mr. Crawford so  
12          eloquently said, and that's the facts of Dwight's  
13          death is what made it so painful to the family.  
14          He didn't have to die. His life was cut short  
15          for profit, and that's just wrong.

16          Thank you for your time, Your Honor. We  
17          respectfully request this Court issue a  
18          \$4 million judgment.

19          THE COURT: All right. Mr. and  
20          Mrs. Crawford, I have to tell you that as I sit  
21          here, as Mr. Gerber referred to, I've got  
22          attorneys out in the hallway and a defendant on  
23          the poly com screen, we're in the middle of a  
24          hearing for a case that's going to trial Monday  
25          morning. We are trying to get some criminal

1           hearings out of the way.

2           I truly regret that we don't have more time  
3           that you could tell me more about your son. And  
4           I suppose I feel guilty and sorry that we can't  
5           afford more time to do that. I apologize for  
6           that. I know you were here on the criminal case.  
7           I remember you from the plea that we took. I  
8           remember quite well the difficulties with regard  
9           to that case when that case was before the Court.

10          And I certainly recall you being here and  
11          representing your son in those proceedings. So I  
12          apologize that here we are on a Friday afternoon  
13          and we have to limit the amount of time that the  
14          Court has available for what I consider to be  
15          your important testimony.

16          I'm also reminded as I sit and listen to  
17          your testimony, not from a violent situation but  
18          from a health situation, I will tell you that I  
19          lost a brother 31 years ago. So my parents are  
20          90 and still alive and deal with that. So I  
21          appreciate how difficult it's been.

22          With regard to the compensatory damages  
23          claim of Mr. and Mrs. Crawford, the Court finds  
24          that the plaintiffs are entitled to compensatory  
25          damages in the amount of \$2 million. The Court

1 has held several hearings on this case, as the  
2 record will reflect, and is extremely familiar  
3 with the facts of the case.

4 As I mentioned, kind of unusual in a larger  
5 county like Jackson County, I actually had the  
6 criminal case and also the civil case. So as a  
7 result of being the presiding judge over both of  
8 those matters I'm extremely familiar with the  
9 underlying facts of the unfortunate loss of  
10 Dwight Crawford.

11 And the Court is also very familiar with the  
12 facts involving the defendant James Samuels and  
13 his involvement in illegally bringing the gun  
14 manufactured by Jimenez Arms into the State of  
15 Missouri, Kansas City community for the sole  
16 purpose of selling it on the streets.

17 The Court finds that Mr. Samuels' pattern of  
18 conduct does demonstrate a complete indifference  
19 to and a conscious disregard for the rights of  
20 others; and therefore, the Court finds that the  
21 Crawford family is entitled to punitive damages  
22 in this matter and will award punitive damages in  
23 the amount of \$2 million as requested by the  
24 plaintiffs.

25 Mr. Gerber, if you would -- I don't believe

1           you have -- if you would email a proposed  
2           judgment to my law clerk Mr. Ash with the  
3           appropriate findings in Word format, he will  
4           present that to me and we'll get that signed and  
5           we will get that entered.

6           I believe, Mr. Dirks, that we're still on a  
7           stay with regard to Jimenez Arms due to the  
8           bankruptcy; is that correct?

9           MR. DIRKS: That's right, Your Honor.

10          THE COURT: Mr. and Mrs. Crawford, I'm not  
11          sure if I will see you again, because I don't  
12          know what is going to happen with regard to  
13          Jimenez Arms, but I certainly wish your family  
14          the best. Okay?

15          MRS. CRAWFORD: Thank you.

16          MR. CRAWFORD: Thank you, Your Honor.

17          THE COURT: Thank you all. This concludes  
18          our hearing. Anything else, Mr. Gerber, for the  
19          record?

20          MR. GERBER: No, that's all. We'll get that  
21          judgment to Your Honor as soon as possible.

22  
23          (Court adjourned.)  
24  
25



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

C E R T I F I C A T E

I, JULIE M. DEL PERCIO, Certified Court Reporter, do hereby certify that I was the official court reporter for Division 10 of the Sixteenth Judicial Circuit of Missouri, at Kansas City, Missouri; that on November 13, 2020, I was present and reported all of the proceedings in ALVINO CRAWFORD, et al., Plaintiffs, vs. JIMENEZ ARMS, INC., et al., Defendants, No. 1916-CV17245. I further certify that the foregoing 24 pages contain a complete and accurate transcription of the proceedings.

/s/ Julie M. Del Percio, C.C.R. #516  
Official Court Reporter