

Expert Witness Report of ANDREW TRAVER

City of Philadelphia v. WRT Management, Inc. et al.,
Case No. 230702394 (Court of Common Pleas, Philadelphia County)

November 3, 2025

1. My name is Andrew Traver; I am currently employed as an Executive in Residence for the Department of Criminal Justice and Criminology at Metropolitan State University in Denver, Colorado, and as a Special Advisor to the University President. I have been in this role since July of 2019. Between 2013 and 2019, I was the Director of the Naval Criminal Investigative Service (NCIS), a sworn Federal criminal investigator, where I was responsible for overseeing all criminal, cyber, counterintelligence, and counterterrorism investigations and operations for the agency worldwide.

2. Prior to NCIS, I worked for 26 years for the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I began my career as a Special Agent in 1987 in Chicago, Illinois. I served as Group Supervisor, then Resident Agent in Charge, in ATF's Philadelphia Field Division between 1993-1998. After an assignment at ATF Headquarters-Inspection Division, and then as the Assistant Special Agent in Charge in New Orleans, Louisiana and San Francisco, California, between 2004 and 2013, I served as a Special Agent in Charge for the Chicago and Denver, Colorado, Field Offices. During my career as an ATF Special Agent, Group Supervisor/Resident Agent in Charge, Assistant Special Agent in Charge and Special Agent in Charge, I had both direct and indirect oversight of the investigation of firearms trafficking organizations and straw purchasing violations committed by both individuals and groups of individuals, among myriad other responsibilities. I both directed and personally participated in ATF regulatory inspections of federal firearms licensees (FFLs), including license revocation proceedings when FFLs violated laws involving firearms trafficking and straw

purchasing. A true and correct copy of my curriculum vitae, detailing my qualifications, is attached as Exhibit A to this report.

3. I have provided my services in this matter at a rate of \$250/hour. This rate reflects my own compensation for expert services and is exclusive of any additional fees charged by the expert search agency through which I was retained.

4. In preparing this expert witness report, I have carefully reviewed and analyzed the following documents:

- a. The Amended Complaint for the *City of Philadelphia v. WRT Management, Inc. et al.*, Case No. 230702394 (Court of Common Pleas, Philadelphia County).
- b. Transaction and other store records produced by Mad Minute Enterprises, LLC d/b/a Delia's Gun Shop, Bates numbered DGS000001-728. These records largely consist of ATF Form 4473s, Pennsylvania Form SP4-113s, ATF Form 3310.4 multiple handgun sale reports, scanned identification, handwritten notes, receipts, background check approvals, and a copy of the store's employee manual. This set of reviewed materials also includes Acquisition and Disposition (A&D) records that were issued duplicate Bates numbers DGS000355-98.
- c. Sales receipts for transactions involving defendant WRT Management, Inc., f/k/a Tanners Sports Center, produced by third party Tanner Operations, LLC in response to subpoena. This production contained 35 pages of records and was produced without Bates numbers.
- d. The following records produced by the City of Philadelphia:
 - i. Charging instruments Bates numbered PHL000001-833, PHL001671-73, PHL001678, and PHL001776-83;
 - ii. NSSF training presentation Bates numbered PHL001589-634;
 - iii. Philadelphia Police Department records Bates numbered PHL001635-70, PHL001674-77, PHL001679-776, PHL001784-899 and PHL001950-76; as well as police records relating to the arrest of Anthony Cipriano that I understand will be produced by the City concurrently with this report and assigned Bates numbers at that time.
 - iv. Records of ATF compliance and inspection history at WRT Management Inc. f/k/a Tanners Sports Center, Bates numbered PHL002007-354, and

Mad Minute Enterprises d/b/a Delia's Gun Shop, Bates numbered PHL002372-3532.

- e. Transcripts of the depositions of (i) Justin Evans, in his capacity as corporate representative of Mad Minute Enterprises, LLC; (ii) Justin Evans, in his individual capacity; (iii) Thomas Hazell; (iv) Steve Winston; (v) Nayara Andrejczyk; (vi) Steveni Keeley; (vii) Nick Keys; (viii) Walter R. Tanner III; and (ix) Christopher Fox.

I. Overview of Straw Purchasing and Gun Store Recordkeeping

5. A "straw purchase" occurs when the actual buyer of a firearm uses another person, a "straw purchaser," to execute the paperwork necessary to purchase a firearm from an FFL. A straw purchaser is a person who willingly and knowingly purchases a firearm or firearms for someone other than him or herself under circumstances other than making the purchase as a *bona fide* gift. Straw purchasers are typically individuals with no disabling prohibitions, such as felony criminal convictions, domestic violence misdemeanor convictions, dishonorable or bad conduct discharges from the United States military services, or an adjudication of being mentally ill, etc., who purchase firearms specifically on behalf of another person, commonly (though not necessarily) a prohibited person, to conceal the actual ownership of the firearm. If an FFL proceeds with a firearms transaction with someone that it knows or has reason to believe is a straw purchaser and records the straw purchaser in its required firearms acquisition and disposition books and records as the actual purchaser of the firearm, the FFL thereby creates an inaccurate record of the firearms transaction because the straw purchaser is not the actual purchaser of the firearm(s).

6. Straw purchases are one of the ways that firearms are diverted out of the legal stream of commerce to criminals and prohibited possessors. Based on my experience in law enforcement interacting with FFLs and conducting and overseeing investigations of straw purchasing and firearms trafficking, it is my opinion that licensed firearms dealers understand

that straw purchases are one method by which criminals and prohibited possessors obtain firearms, and that straw purchased firearms are often used in criminal activity.

7. I am familiar with federal laws and regulations concerning the obligations of FFLs to keep and maintain firearm transaction records, specifically the requirement that the FFL obtain a completed Firearms Transaction Record, ATF Form 4473, prior to transferring any firearm to a non-licensee, and ensure that the ATF Form 4473 is completed correctly in accordance with the form's instructions. Among other things, the ATF Form 4473 asks prospective purchasers "Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s)" and explains that "Warning: you are not the actual transferee/buyer (of the firearm(s)) if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer any of the firearm(s) to you."¹ The ATF Form 4473 also requires that the prospective purchaser certify that all of the information and answers to all questions on the ATF Form(s) 4473 are true, correct, and complete, and warns that "making any false oral or written statements...is a crime punishable as a felony under Federal law." It also warns that falsely stating that the straw purchaser is the "actual transferee/buyer" of the firearm(s) listed on the ATF Form 4473 is "a crime punishable as a felony under Federal law and may also violate State and/or local law."

8. Before transferring a firearm to a non-licensee, a licensed retail dealer must also sign the ATF Form 4473, and in doing so certifies on the basis of (i) the prospective purchaser's responses on the Form, (ii) the prospective purchaser's identification, and (iii) the State and local laws applicable to the firearms business, that "it is my belief that it is not unlawful for me to sell,

¹ This language is found on the May 2020 revision of ATF Form 4473. Other revisions of this form contain materially similar language with slight variations.

deliver, transport, or otherwise dispose of the firearm(s) listed on this form to the person identified [as the transferee/buyer].”

9. I am also familiar with Pennsylvania’s Application/Record of Sale Form for firearms transactions, Form SP4-113. Pennsylvania law requires licensed dealers to obtain a completed Form SP4-113 for each firearms transaction, and to contact the Pennsylvania State Police’s Instant Check System to conduct a background check of the purchaser. Similar to ATF Form 4473, Form SP4-113 asks prospective purchasers “Are you the actual buyer of the firearm as defined under 18 Pa. C.S. § 6102 listed on this application/record of sale?” and warns “(Warning: you are not the actual buyer if you are acquiring the firearm on behalf of another person unless you are legitimately acquiring the firearm as a gift for any of the following individuals who are legally eligible to own a firearm: 1) spouse; 2) parent; 3) child; 4) grandparent; 5) grandchild.)” The prospective purchaser also signs the Form SP4-113 and in doing so “verif[ies] that the facts that I have set forth in blocks 5-33 of this form are true and correct to the best of my knowledge, information, and belief,” and acknowledges that false statements are “a crime punishable as a felony.” The FFL must also sign and date the Form SP4-113 before completing the transaction.

10. FFLs are required to maintain the completed ATF Form 4473 and Pennsylvania Form SP4-113 in their records. They must also record the disposition of the firearm in the dealer’s bound Acquisition and Disposition book. In addition, if an individual purchases multiple handguns at the same time or within a five-day period, the FFL dealer must complete an ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers, and submit a copy of this form to law enforcement, while retaining a copy in the FFL’s records. It is a

violation of federal law for an FFL to knowingly make a false entry in, or to fail to make appropriate entry in, or fail to properly maintain, any of these federal records.

11. Straw purchase “red flag” indicators are those behaviors and/or patterns of behavior that law enforcement identify and recognize as typical of individuals involved in the illicit straw purchasing of firearms, often triggering criminal investigations into these behaviors. The ATF provides guidance and training to FFLs on how to recognize these red flag indicators, as do firearms industry groups like the National Shooting Sports Foundation (as explained in more detail below). Based on my 26 years of work at ATF and experience working on and supervising numerous firearms trafficking and straw purchasing investigations, the following are examples of straw purchasing red flag indicators:

- a) Purchasing multiple firearms of the same make, same or similar model, and/or caliber. While it is not unusual for firearms aficionados to have a “favorite” make, model, and/or caliber of firearm, it is uncommon for an individual to purchase multiple firearms of the same make, model and/or caliber in the same transaction or in multiple transactions over a relatively short period of time or on multiple separate occasions.
- b) Intentionally structuring the purchase of multiple firearms outside of a five-business-day period to avoid triggering an FFL’s multiple-sale reporting requirement. When an individual purchases two or more firearms within five business days, the FFL is required to generate an ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers. In my experience, straw purchasers working at the behest of an illicit firearms trafficking individual or organization adapted readily to the ATF enhancement of the multiple firearms sales reporting requirements for FFLs by purchasing a single firearm from an FFL, waiting until the five-business-day period has elapsed, and then returning to that FFL for another single firearm purchase. This practice can be repeated multiple times, and an illicit firearms-trafficking individual or organization can also compensate by having multiple straw purchasers each buy a single firearm from a single FFL, wait the required five-business-day period, then have them all individually return for additional single firearms purchases.

- c) General unfamiliarity with the make, model, caliber and cost of firearms. Some straw purchasers even rely on handwritten or other types of notes when selecting firearms for purchase.
- d) Paying for purchases in cash, particularly purchases of multiple and/or expensive firearms, along with ammunition and accessories. Firearms purchasers who indicate being unemployed or employed in low-paying jobs purchasing expensive and/or multiple firearms are particularly suspect.
- e) Purchasing a substantial number of firearms in a single transaction (two or more).
- f) Purchaser accompanied by one or more other individuals who are actively indicating which firearm(s) to purchase and/or taking an active part in the firearm acquisition process.
- g) Purchaser communicating via voice or text message utilizing a mobile telephone while selecting a firearm or firearms for purchase.
- h) Firearms purchasers who enter incorrect and/or incomplete information on the ATF Form 4473(s), hard copy, or electronic versions, particularly with respect to personal identifying information and/or questions that indicate prohibited from purchase/eligible to purchase status.

12. Additionally, based on my law enforcement training and cumulative knowledge and experience in conducting and supervising illegal firearms trafficking investigations, the following factors indicate to law enforcement that a firearm or firearms have been illegally straw purchased and illicitly trafficked:

- a) Purchased firearm(s) that are reported as stolen very shortly after purchase or in a relatively close time period to recovery by law enforcement.
- b) Purchased firearm(s) that are recovered from someone other than the retail purchaser.
- c) Purchased firearm(s) that are recovered that were part of a reported multiple sale.
- d) Purchased firearm(s) that are recovered by law enforcement with a short “time-to-crime.” Time-to-crime refers to the elapsed time between the initial purchase of a firearm and when it is recovered by law enforcement in connection with a criminal investigation. The shorter the elapsed time between initial purchase of a

firearm and the subsequent recovery by law enforcement, the more likely that the initial firearm purchase was conducted by a straw purchaser and subsequently illegally trafficked. ATF generally considers a time-to-crime of less than three years to be indicative of straw purchasing, and with a time-to-crime of one year or less to be strongly indicative of straw purchasing.

II. Delia's ATF Inspection History, Policies, and Procedures

13. I am also personally familiar with what transpires during ATF investigations and compliance inspections, such as those that took place at Delia's Gun Shop, as well as with the responsibilities of FFLs in detecting, deterring and preventing straw purchasing and illegal firearm trafficking. ATF has clearly acknowledged that the FFL and the FFLs' retail employees are the first line of defense against straw purchasing and illegal firearms trafficking. FFLs are under no legal obligation to sell or transfer any firearm to any individual that the FFL suspects to be purchasing a firearm for someone other than themselves, or to otherwise be involved in any type of illegal firearms acquisition, straw purchasing, and/or trafficking scheme.

14. Based on my review of ATF records relating to Delia's licensing and compliance inspection history that were produced in discovery, Delia's applied for an FFL in January 2015, and this application was approved after a Qualification Inspection. As part of this Qualification Inspection, ATF personnel would have reviewed the recordkeeping and other requirements of the Gun Control Act and its implementing regulations with the store's responsible person(s), including providing a description of straw purchasing and the prohibition on a licensee proceeding with a sale where he or she is aware of false statements on the ATF Form 4473. Delia's responsible persons both signed an acknowledgement that ATF had reviewed and explained this material and answered any questions on March 6, 2015.

15. ATF records also indicate that the next year, in April 2016, ATF personnel acting on a tip interviewed a Delia's employee concerning a suspected straw purchase of a Century

Arms Zastava 7.62x39 rifle. During that interview, the Delia's employee told ATF personnel that he had sold the firearm in question to two males, one of whom completed the paperwork in his name and the other of whom paid for the firearm using a debit card. This was an obvious straw purchase that Delia's should have recognized and prevented. ATF subsequently initiated a compliance inspection and found that Delia's had violated Federal law by proceeding with this straw purchase. At the conclusion of this inspection, ATF personnel reviewed the Report of Violations with the store's responsible person(s) and once again reviewed the requirements of the Gun Control Act, including provisions relating to straw purchasing. Delia's responsible person signed acknowledgments of both the Report of Violations and the remedial post-inspection review of applicable federal laws on June 23, 2016. As a result of these violations, ATF suspended Delia's FFL for three days and imposed a \$3,000 fine, finding that Delia's had knowingly transferred a firearm to an unlicensed person while knowingly failing to conduct a background check on that person in violation of federal law. Delia's did not contest these findings, informed ATF that it accepted full responsibility for this straw purchase transaction, pledged that it would do its best to prevent future straw purchase sales, and stated that it was providing remedial training to its employees about federal firearms laws and regulation.

16. ATF conducted another compliance inspection in January 2018, finding one violation relating to firearms missing from the store's inventory. ATF once again reviewed the requirements of the Gun Control Act and its implementing regulations with the store's responsible person(s), including provisions relating to straw purchasing. Delia's owner signed an acknowledgement of this review on March 29, 2018. Based on these repeated interactions with ATF during compliance inspections, and in particular the ATF's suspension of Delia's FFL in 2016 for engaging in an illegal straw purchase sale, it is my opinion that the store and its

employees were fully aware of their obligations to detect and prevent straw purchasing at the store.

17. Furthermore, the National Shooting Sports Foundation (NSSF), in partnership with ATF, was instrumental in developing and delivering the “Don’t Lie for the Other Guy” educational campaign. This campaign instructs FFLs and their employees in the ways to detect, deter, and prevent straw purchases. NSSF’s “Don’t Lie for the Other Guy” educational campaign materials include: reasons and incentives for an FFL to review their business “straw purchase avoidance program”; ATF’s firearms trace request requirements; straw purchase avoidance training ideas for the FFL and staff; using the red flag indicators described above to recognize/identify a potential straw purchaser; and guidance to employees as to how to best handle a potential straw purchase, including the emphasis on employees being prepared to say “No Sale” if any behavior indicative of straw purchasing is detected or suspected. The materials remind FFLs and their employees that “you have every right, as well as the responsibility, to deny a firearm transfer to anyone for any reason, even if that reason is “it just doesn’t feel right”, and underscore the imperative to “Follow your instincts-if you are not comfortable with a (firearms) sale, don’t do it!”

18. Despite Delia’s compliance history and multiple interactions with ATF, it is my opinion based on my review of Delia’s employee handbook and the testimony of Delia’s employees, that Delia’s does not have adequate policies or procedures to detect and prevent straw purchases at the store. Although the store maintains an employee handbook, it does not cover straw purchasing, and the store’s corporate representative confirmed that the store does not have any written policies or procedures beyond informal conversations between employees. Nor does the store have any formalized training for new employees on how to recognize and prevent

straw purchases. Based on the testimony of the store's corporate representative, Delia's also appears to have (or have had throughout much of the time period relevant to the City's lawsuit) inadequate policies and procedures to (a) identify and timely report multiple handgun sales to law enforcement, (b) detect errors and/or suspicious responses on customer paperwork, (c) identify suspicious buying patterns based on customer purchase history, or (d) identify customers whose previous firearms purchases at Delia's had been traced by law enforcement.

19. Based on my review of testimony from Tanner's owner and manager, it is my opinion that Tanner's also lacked adequate policies or procedures to detect and prevent straw purchases, and to train employees to recognize red flag indicators of illegal transactions. Tanner's owner and manager both testified that the store had no written training manual or policies for employees, and that training to recognize straw purchasing—to the extent there was any—consisted of nothing more than 'informal' conversations between employees. Although Tanner's did have the capability to record when a customer's firearm was traced by law enforcement in connection with criminal activity, both the owner and manager testified that the store did not share this information with salespeople in the event that customer came back to buy another gun at the store. The store manager also testified that Tanner's had no written 'do not sell' list.

III. Straw Purchasing at Mad Minute Enterprises d/b/a Delia's Gun Shop

20. I was asked by the City to review documentation for certain firearms transactions that occurred at Delia's Gun Shop between 2018 and 2023 and to determine whether the transactions included indicators of straw purchasing.

Charles L. Thompson

21. An individual identified as Charles L. Thompson purchased five identical-make-and-model Taurus G2C 9mm firearms between September 7, 2019, and January 31, 2020, including two purchased on the same day, January 28, 2020, and three purchased in a four-day span, from January 28 to January 31, 2020. He also attempted, but did not complete, a transaction to purchase another identical Taurus G2C handgun on September 7, 2019. The Taurus family of firearms is relatively inexpensive and considered by avid firearms aficionados to be of lesser quality than other popular, more expensive firearms brands. Thompson [REDACTED] [REDACTED] for these firearms, for a grand total [REDACTED], despite [REDACTED] [REDACTED] on his SP4-113 Forms.

22. Thompson also [REDACTED] [REDACTED]. On September 7 and October 19, 2019, he indicated [REDACTED] [REDACTED]. On January 28, 2020, he indicated [REDACTED] [REDACTED]. Finally, on January 31, 2020, he indicated [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED].

23. Based on my training and experience, it is my opinion that Charles L. Thompson exhibited common red flag indicators of being a straw purchaser engaged in illegal firearms trafficking, including purchasing (and attempting to purchase) multiple firearms of the same or similar make, model, and/or caliber, purchasing multiple firearms in a relatively short period of

time (including two firearms purchased on the same day and three firearms purchased in a four-day span), purchasing firearms [REDACTED], and [REDACTED].

24. Further, it is my opinion that Charles L. Thompson's exhibition of common red flag indicators of straw purchasing should have been readily recognizable by the employees of Delia's, who per deposition and the promulgated responsibilities of FFL employees had been or should have been trained to recognize these as indicators of likely straw purchasing. The same Delia's employees—in particular, Dave Reid and Thomas Hazell—were involved in multiple transactions with Thompson and therefore either did or should have recognized his suspicious purchasing activity. Based on these indicators, it is my opinion that Delia's knew or should have known that Thompson was likely a straw purchaser and denied these transactions.

25. In addition, according to the charging document in Thompson's criminal case, Thompson was accompanied while in Delia's by at least three other individuals during the January 28, 2020, straw purchases, and by at least one other individual during the January 31, 2020, straw purchase. This coordinated buying behavior is a further indicator of straw purchasing that should have been apparent to store employees. This further reinforces my opinion that Delia's employees knew or should have recognized that Thompson was likely a straw purchaser, though Thompson exhibited sufficient red flag indicators of straw purchasing to support this conclusion independent of any coordinated activities in the store.

26. During these transactions with Thompson, Delia's employees should have taken steps to clarify the suspicious aspects of his transactions, including by questioning him and potentially by reporting him to law enforcement. However, when questioned about this during depositions in this lawsuit, a Delia's employee involved in these transactions invoked his Fifth

Amendment right against self-incrimination and refused to explain what actions he had taken to question or report Thompson. From this refusal, I infer that this Delia's employee did not take steps to question or report Thompson's suspicious behavior.

27. According to Philadelphia Police Department reports that I have reviewed, three of the firearms purchased by Charles L. Thompson were later recovered by the Philadelphia Police Department. One Taurus G2C 9mm firearm was recovered on April 28, 2021, pursuant to a vehicle search warrant predicated on a car stop from the preceding day (April 27, 2021). The Taurus firearm was recovered from beneath the driver's seat and when researched, had been reported as stolen. This Taurus firearm was purchased on November 30, 2019, by Charles L. Thompson from Delia's. Furthermore, this Taurus G2C 9mm firearm was involved in multiple shooting incidents, beginning on March 18, 2020, and again on March 30, 2020, May 25, 2020, June 9, 2020, and finally on May 24, 2021. According to Philadelphia Police Department incident reports, the first two shootings involved adult victims; the third involved a child victim; the fourth involved an adult victim shot multiple times, resulting in a homicide; and the fifth involved yet another adult victim. Laboratory ballistics testing conducted by the Philadelphia Police Department's Office of Forensic Science Firearms Identification Laboratory and comparison and correlations conducted by the National Integrated Ballistics Information Network (NIBIN) on ballistics evidence recovered from the various shooting incident crime scenes indicated that this particular Taurus G2C 9mm handgun purchased by Charles L. Thompson from Delia's on November 30, 2019, was in fact the firearm used in all five of the aforementioned shooting incidents.

28. On April 17, 2020, the Philadelphia Police Department recovered a Taurus G2C 9mm firearm that featured two different serial numbers, one on the slide (TMW76023) and the

other on the frame (TMW78892). Both serial numbers were checked and reported as stolen; each serial number was associated with a different Taurus G2C 9mm firearm purchased by Charles L. Thompson from Delia's on the same day, January 28, 2020. It should be noted that the component parts of firearms of the same make, model, and caliber are generally interchangeable; therefore, a slide from one Taurus G2C 9mm firearm can readily be installed and used on the receiver of a different Taurus G2C 9mm firearm.

29. Based on my training and experience, the fact that two of the firearms purchased from Delia's by Charles L. Thompson were recovered by Philadelphia police with a short time-to-crime, including one firearm linked to multiple shooting incidents/violent crimes, including a homicide, is additional confirmation that these firearms were straw purchased and illegally trafficked.

Emmitt M. Smith

30. An individual identified as Emmitt M. Smith purchased a Taurus PT111 9mm firearm from Delia's on March 30, 2018. Smith purchased two additional Taurus 9mm firearms, a model G2C on June 9, 2018, and a model PT111 on June 23, 2018. Smith paid [REDACTED], at a total cost of [REDACTED], despite [REDACTED]. During his March 30 and June 9, 2019, transactions, Smith also indicated [REDACTED]. Earlier, Smith had also purchased an FEG PMK .380 caliber firearm on January 19, 2018, from Delia's.

31. Based on my training and experience, it is my opinion that Emmitt M. Smith exhibited common red flag indicators of being a straw purchaser engaged in illegal firearms

trafficking, including purchasing multiple firearms of the same or similar make, model, and/or caliber, purchasing multiple firearms in a relatively short period of time (including three firearms purchased within approximately a two month period and two within a two week period), [REDACTED]

[REDACTED]

32. It is my opinion that Emmitt M. Smith’s exhibition of common red flag indicators of straw purchasing should have been readily recognizable by the employees of Delia’s, who per deposition and the promulgated responsibilities of FFL employees had been or should have been trained to recognize red flag indicators of likely straw purchasing. Two Delia’s employees—Dave Reid and Thomas Hazell—were each involved in a pair of transactions with Smith, and therefore either did or should have recognized his suspicious purchasing activity. Based on these indicators, it is my opinion that Delia’s knew or should have known that Smith was a likely straw purchaser.

33. During these transactions with Smith, Delia’s employees should have taken steps to clarify the suspicious aspects of his transaction including by questioning him and potentially by reporting him to law enforcement. However, when questioned about this during depositions in this lawsuit, Delia’s employees involved in these transactions invoked their Fifth Amendment right against self-incrimination and refused to explain what actions they had taken to question or report Smith. From this refusal, I infer that Delia’s employees did not take steps to question or report Smith’s suspicious behavior.

34. The Taurus PT111 firearm purchased by Emmitt M. Smith from Delia’s on March 30, 2018, was recovered by the Philadelphia Police Department on September 30, 2019, from a convicted felon, a person prohibited under Federal and Pennsylvania law from possessing,

purchasing, or transferring a firearm. Laboratory ballistics testing conducted by the Philadelphia Police Department's Office of Forensic Science Firearms Identification Laboratory and comparison and correlations conducted by the National Integrated Ballistics Information Network (NIBIN) on ballistics evidence recovered from a shooting incident crime scene that occurred on July 20, 2019, indicated that this particular firearm, a Taurus PT111 G2 9mm firearm, purchased by Emmitt M. Smith from Delia's on March 30, 2018, was in fact the firearm used in the aforementioned shooting incident.

Akeira N. Harcum

35. An individual identified as Akeira N. Harcum purchased a Glock model 26 9mm firearm and a Glock model 43 9mm firearm from Delia's on February 24, 2022. Harcum purchased two additional Glock model 26 9mm firearms on March 4, 2022, from Delia's. As mentioned previously, it is a common red flag indicator of being a straw purchaser when an individual purchases multiple firearms of the same make, same or similar model, and caliber and/or purchases multiple firearms in a relatively short period of time. Harcum purchased two Glock 9mm firearms on the same day twice in a span of only nine days. Furthermore, Harcum purchased three identical Glock model 26 firearms within the same nine-day period, including two Glock model 26 firearms on the same day, March 4, 2022. Harcum paid [REDACTED]

[REDACTED], for a total [REDACTED]
[REDACTED]

36. Based on my training and experience, it is my opinion that Akeira N. Harcum exhibited common red flag indicators of being a straw purchaser engaged in illegal firearms trafficking, including purchasing multiple firearms of the same make, same or similar model, and caliber (three of Harcum's purchased firearms were identical Glock model 26 9mm firearms, two

purchased together on the same day), purchasing multiple firearms in a relatively short period of time, including all four firearms purchased within just a nine-day period of time in two multiple-sale transactions, and [REDACTED]

37. It is my opinion that Akeira N. Harcum's exhibition of common red flag indicators of straw purchasing should have been readily recognizable by employees of Delia's, who per deposition and the promulgated responsibilities of FFL employees had been or should have been trained to recognize red flag indicators of likely straw purchasing. Furthermore, information about Harcum's suspicious purchasing behavior was recorded in Delia's computerized AXIS system and therefore was available to all Delia's salespeople and should have put them on notice that she was a likely straw purchaser. Based on these indicators, it is my opinion that Delia's knew or should have known that Harcum was a likely straw purchaser.

Robert Otis Cooper

38. An individual identified as Robert Otis Cooper purchased a Glock model 43X 9mm firearm from Delia's on June 22, 2021, a Glock model G30 .45 caliber firearm from Delia's on June 29, 2021, and a Glock model 23 .40 caliber firearm from Delia's on July 3, 2021. As mentioned previously, it is a common red flag indicator of being a straw purchaser when an individual purchases multiple firearms of the same make, same or similar model, and caliber and/or purchases multiple firearms in a relatively short period of time. Robert Otis Cooper purchased all three Glock firearms in a span of only eleven days; the first and second Glock firearms were purchased seven days apart, and the second and third Glock firearms were purchased four days apart. Cooper also [REDACTED], for a total amount of [REDACTED]

39. Based on my training and experience, it is my opinion that Robert Otis Cooper exhibited common red flag indicators of being a straw purchaser engaged in illegal firearms trafficking, including purchasing multiple firearms of the same make, same or similar model, and caliber (all three of Cooper's purchased firearms were Glock handguns), purchasing multiple firearms in a relatively short period of time (including all three firearms purchased within just an eleven-day period and two firearms purchased within four days), and [REDACTED]

40. It is my opinion that Robert Otis Cooper's exhibition of common red flag indicators of straw purchasing should have been readily recognizable by employees of Delia's, who per deposition and the promulgated responsibilities of FFL employees, had been or should have been trained to recognize red flag indicators of likely straw purchasing. Further, Cooper's suspicious purchasing behavior was recorded in Delia's computerized AXIS system and therefore was available to all Delia's salespeople and should have put them on notice that he was a likely straw purchaser. Based on these indicators, it is my opinion that Delia's knew or should have known that Cooper was a likely straw purchaser.

41. During these transactions with Cooper, Delia's employees should have taken steps to clarify the suspicious aspects of his transaction including by questioning him and potentially reporting him to law enforcement. However, when questioned about this during depositions in this lawsuit, Delia's employees involved in these transactions invoked their Fifth Amendment right against self-incrimination and refused to explain what actions they had taken to question or report Cooper. From this refusal, I infer that Delia's employees did not take steps to question or report Cooper's suspicious behavior.

Anthony Cipriano

42. An individual identified as Anthony Cipriano, utilizing the appropriated identification (a stolen Pennsylvania Driver's License) of one W [REDACTED] M [REDACTED] purchased seven firearms from Delia's between April 23, 2021, and May 26, 2021, a time-period of slightly over one month. Cipriano purchased a Ruger P95 DC 9mm firearm from Delia's on April 23, 2021. Cipriano purchased an SCCY CPX-2 9mm firearm two days later on April 25, 2021. On May 8 and May 20, 2021, Cipriano purchased two Eastern European Arms Girsan 9mm firearms. Cipriano also purchased from Delia's two firearms, a Glock model 21 .45 ACP caliber firearm and a Smith and Wesson M&P15-22 .22 LR caliber firearm, on May 24, 2021, and a Ruger 57 5.7 x 28mm firearm on May 26, 2021. Cipriano [REDACTED] [REDACTED]; however, Delia's did not produce sales receipts for any of his other purchases.

43. According to charging documents, investigators determined that Anthony Cipriano was utilizing identification that was not his own, but rather a Pennsylvania State driver's license belonging to W [REDACTED] M [REDACTED] that was found to be stolen on April 16, 2021, prior to Cipriano's initial firearms purchase from Delia's on April 23, 2021. During the ensuing investigation, law enforcement officers presented a Delia's employee ("employee 2") with photographs of W [REDACTED] M [REDACTED] and inquired if he was in fact the individual who had made the various firearms purchases on April 23 and 25, and on May 8, 20, 24, and 26. The Delia's employee ("employee 2") stated that the individual whom he believed to be W [REDACTED] [REDACTED] M [REDACTED] was not the individual in the photographs, and that the individual who actually purchased the aforementioned firearms wore his hair in dreadlocks and had a tattoo under one eye. Investigators reviewed closed-circuit video footage provided by Delia's and

corroborated that the individual identifying himself as W [REDACTED] M [REDACTED] was in fact Cipriano, who used W [REDACTED] M [REDACTED] stolen Pennsylvania State driver's license as his identification to purchase firearms from Delia's on multiple occasions. According to charging documents, a Delia's employee ("employee 2") acknowledged to investigators that Cipriano did not match the image and likeness of W [REDACTED] M [REDACTED] on the driver's license presented as identification; therefore, the firearms purchases should not have been completed and should have all been denied.

44. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. It is my opinion that it should have been—and was—obvious to Delia's employees that the identification that Cipriano presented when purchasing firearms from the store did not belong to him. If an individual is utilizing identification that clearly does not belong to that individual to purchase firearms on multiple occasions, it is a red flag indicator of straw purchasing, and when it is recognized as such by the FFL's employee, the transactions should not be completed and should be denied.

45. Another red flag indicator that was or should have been apparent to Delia's employees is that Cipriano [REDACTED]

[REDACTED]. For example, on April 23, 2021, Cipriano

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

46. Based on my training and experience, it is my opinion that Anthony Cipriano exhibited common red flag indicators of being a straw purchaser engaged in illegal firearms trafficking, including purchasing multiple firearms of the same make or the same or similar model, and caliber, purchasing multiple firearms in a relatively short period of time (including four firearms purchased within just a nine-day period of time, with two firearms purchased on a single day, done twice, within the same nine-day period of time), [REDACTED] [REDACTED], [REDACTED], [REDACTED].

47. It is my opinion that Anthony Cipriano’s exhibition of common red flag indicators of straw purchasing should have been readily recognizable by employees of Delia’s, who per deposition and the promulgated responsibilities of FFL employees, had been or should have been trained to recognize red flag indicators of likely straw purchasing. Further, three Delia’s employees—in particular, Dave Reid, Thomas Hazell, and Charlie Rastetter—were each involved in multiple transactions with Cipriano and therefore either did or should have recognized his suspicious purchasing activity. Based on these indicators, it is my opinion that Delia’s knew or should have known that Cipriano was a likely straw purchaser.

48. During these transactions with Cipriano, Delia’s employees should have taken steps to clarify the suspicious aspects of his transactions, particularly the fact that he did not physically match the individual on his provided form of identification, the stolen driver’s license of W [REDACTED] M [REDACTED] including by questioning him, and should have reported him

to law enforcement. However, when questioned about this during depositions in this lawsuit, Delia's employees involved in these transactions invoked their Fifth Amendment right against self-incrimination and refused to explain what actions they had taken to question or report Cipriano. From this refusal, I infer that Delia's employees did not take steps to question or report Cipriano's suspicious behavior.

49. The SCCY CPX-2 9mm firearm purchased by Cipriano from Delia's on April 25, 2021, was recovered by the Philadelphia Police Department on January 9, 2023, pursuant to a narcotics violation arrest. The Eastern European Arms Girsan 9mm firearm, purchased by Cipriano from Delia's on May 20, 2021, was recovered by the Philadelphia Police Department on June 26, 2022, pursuant to a narcotics violation arrest. Laboratory ballistics testing conducted by the Philadelphia Police Department's Office of Forensic Science Firearms Identification Laboratory and comparison and correlations conducted by the National Integrated Ballistics Information Network (NIBIN) on ballistics evidence recovered from a non-fatal shooting incident crime scene that occurred on May 24, 2021, indicated that this particular firearm, a EA Girsan MC28 9mm firearm purchased by Anthony Cipriano from Delia's on May 20, 2021, was in fact the firearm used in the aforementioned shooting incident.

50. Based on my training and experience, the fact that two of the firearms purchased from Delia's by Anthony Cipriano were recovered by the Philadelphia Police Department with a short time-to-crime, including at least one firearm linked to a shooting incident/violent crime, is additional confirmation that these firearms were straw purchased and illegally trafficked.

Gregg Dreghorn

51. An individual identified as Gregg Dreghorn purchased four firearms from Delia's within the three-week time-period between June 13, 2023, and July 3, 2023. Dreghorn purchased

two Glock model 19 GEN 5 9mm firearms on June 13, 2023, then purchased a third Glock Model 19 GEN 5 9mm firearm and a Ruger 5.7mm firearm from Delia's on July 3, 2023. As mentioned previously, it is a common red flag indicator of being a straw purchaser when an individual purchases multiple firearms of the same make, same or similar model, and caliber and purchases multiple firearms in a single transaction and/or in a relatively short period of time. Dreghorn purchased two identical Glock model 19 GEN 5 9mm firearms on the same day, June 13, 2023, and then purchased a third Glock model 19 GEN 5 9mm firearm only three weeks later. He also [REDACTED], totaling [REDACTED]
[REDACTED]

52. Based on my training and experience, it is my opinion that Gregg Dreghorn exhibited common red flag indicators of being a straw purchaser engaged in illegal firearms trafficking, including purchasing multiple firearms of the same make, same or similar model, and caliber (three of Dreghorn's purchased firearms being identical Glock model 19 GEN 5 9mm firearms, two purchased together on the same day), purchasing multiple firearms in a relatively short period of time (including all four firearms purchased within a three-week period, with two firearms purchased on a single day, done twice), [REDACTED]
[REDACTED]

53. It is my opinion that Gregg Dreghorn's exhibition of common red flag indicators of straw purchasing should have been readily recognizable by employees of Delia's, who per deposition and the promulgated responsibilities of FFL employees, had been or should have been trained to recognize red flag indicators of likely straw purchasing. Furthermore, information about Dreghorn's suspicious purchasing behavior was recorded in Delia's computerized AXIS system and was therefore available to all Delia's salespeople and should have put them on notice

that he was a likely straw purchaser. Based on these indicators, it is my opinion that Delia's knew or should have known that Dreghorn was a likely straw purchaser.

54. During these transactions with Dreghorn, Delia's employees should have taken steps to clarify the suspicious aspects of his transaction including by questioning him and potentially by reporting him to law enforcement. However, when questioned about this during depositions in this lawsuit, a Delia's employee involved in these transactions invoked his Fifth Amendment right against self-incrimination and refused to explain what actions he had taken to question or report Dreghorn. From this refusal, I infer that this Delia's employee did not take steps to question or report Dreghorn's suspicious behavior.

Anthony Figueroa-Marko

55. An individual identified as Anthony Figueroa-Marko purchased three firearms from Delia's within the five-week time-period between November 6, 2023, and December 14, 2023. Figueroa-Marko purchased a Glock model 43X 9mm firearm and a Taurus model G3C 9mm firearm on November 6, 2023, and then purchased a Palmetto State Armory model Dagger Compact 9mm firearm on December 14, 2023. It is common red flag indicators of being a "straw purchaser" when an individual purchases multiple firearms of the same make, same or similar model, and caliber and purchases multiple firearms in a relatively short period of time. Figueroa-Marko purchased two similar 9mm firearms, a Glock model 43X firearm and a Taurus model G3C firearm, on the same day, November 6, 2023, and then purchased yet another 9mm firearm, a Palmetto State Armory model Dagger Compact firearm, on December 14, 2023, only five weeks later. Furthermore, if one compares the three firearms purchased from Delia's by Figueroa-Marko, they are quite similar in appearance, despite being made by three different

manufacturers. [REDACTED]
[REDACTED].

56. Based on my training and experience, it is my opinion that Anthony Figueroa-Marko exhibited common red flag indicators of being a straw purchaser engaged in illegal firearms trafficking, including purchasing multiple firearms of the same make, same or similar model, and caliber (all three of Figueroa-Marko's purchased firearms being quite similar-in-appearance 9mm firearms, two purchased together on the same day), purchasing multiple firearms in a relatively short period of time (including all three firearms purchased within a five-week period of time, with two firearms purchased on a single day), [REDACTED]
[REDACTED].

57. It is my opinion that Anthony Figueroa-Marko's exhibition of common red flag indicators of straw purchasing should have been readily recognizable by employees of Delia's, who per deposition and the promulgated responsibilities of FFL employees, had been or should have been trained to recognize red flag indicators of likely straw purchasing. Furthermore, based on the timing of Figueroa-Marko's transactions and the testimony of Delia's corporate representative about the store's implementation of the AXIS computer system, information about Figueroa-Marko's suspicious purchasing behavior should have been recorded in the store's computerized AXIS system. It should therefore have been available to all Delia's salespeople and should have put them on notice that he was a likely a straw purchaser. Based on these indicators, it is my opinion that Delia's knew or should have known that Figueroa was a likely straw purchaser.

58. During these transactions with Figueroa-Marko, Delia's employees should have taken steps to clarify the suspicious aspects of his transaction including by questioning him and

potentially by reporting him to law enforcement. However, when questioned about this during depositions in this lawsuit, Delia's employees involved in these transactions invoked their Fifth Amendment right against self-incrimination and refused to explain what actions they had taken to question or report Figueroa-Marko. From this refusal, I infer that Delia's employees did not take steps to question or report Figueroa-Marko's suspicious behavior.

Tyrone Gresham

59. An individual identified as Tyrone Gresham purchased a Glock model 27 .40 caliber firearm on December 19, 2019, a Taurus model G3C 9mm firearm on February 8, 2021, and a Glock model 23 .40 caliber firearm on April 29, 2021, all from Delia's. As mentioned previously, it is a common red flag indicator of being a straw purchaser when an individual purchases multiple firearms of similar model and caliber and/or purchases multiple firearms in a relatively short period of time; in this instance Gresham purchases included two .40 caliber Glock handguns. Gresham also [REDACTED]

60. Based on my training and experience, it is my opinion that Tyrone Gresham exhibited common red flag indicators of being a straw purchaser engaged in illegal firearms trafficking, including purchasing multiple firearms of the similar model and caliber (two of Gresham's purchased firearms were .40 caliber Glock handguns), [REDACTED]

61. In addition, according to the charging document in Gresham's criminal case, Gresham was using his mobile phone while inside Delia's during his April 29, 2019, transaction at the store. Specifically, the charging document describes surveillance footage from inside the store showing Gresham accessing his mobile phone on at least two separate occasions during his

roughly hour-long transaction. Using a mobile phone to communicate via voice, video, or text while purchasing a firearm is a well-known red flag indicator of straw purchasing, as straw purchasers often communicate with their co-conspirators to discuss firearm selection, price, and other instructions for the straw purchase. Delia's corporate representative acknowledged the store's awareness that mobile phones are an "easy tool for people to commit straw purchases," and stated that the store implemented a policy in 2017 banning mobile phone use within the store. The store's corporate representative also testified that notices of this policy are posted throughout the store, and that it is "drilled into [employees'] heads." The fact that Tyrone Gresham accessed his mobile phone on multiple occasions during his April 29, 2019, transaction is a further indicator of straw purchasing that should have been apparent to store employees—and all the more so because Gresham apparently did so in open violation of Delia's store policy.

62. It is my opinion that Tyrone Gresham's exhibition of common red flag indicators of straw purchasing should have been readily recognizable by employees of Delia's, who per deposition and the promulgated responsibilities of FFL employees, had been or should have been trained to recognize red flag indicators of likely straw purchasing. Further, Delia's employee Thomas Hazell was involved in the final two transactions with Gresham and therefore either did or should have recognized his suspicious purchasing activity. Based on these indicators, it is my opinion that Delia's knew or should have been aware that Gresham was a likely straw purchaser.

63. During these transactions with Gresham, Delia's employees should have taken steps to clarify the suspicious aspects of his transaction including by questioning him and potentially by reporting him to law enforcement. However, when questioned about this during depositions in this lawsuit, Delia's employees involved in these transactions invoked their Fifth Amendment right against self-incrimination and refused to explain what actions they had taken

to question or report Gresham. From this refusal, I infer that Delia's employees did not take steps to question or report Gresham's suspicious behavior.

64. The Glock model 23 .40 caliber firearm was recovered by the Philadelphia Police Department on October 27, 2022, pursuant to a traffic stop and a subsequent drug violation arrest. The "time-to-crime" (the elapsed time from original purchase to recovery by law enforcement) of approximately six months and the mere fact of being recovered by law enforcement from a party other than Tyrone Gresham are strong additional confirmation that this firearm was straw purchased and illegally trafficked. Based on my training and experience, it is my opinion that Tyrone Gresham straw purchased this firearm and was engaged in illegal firearms trafficking.

65. Furthermore, laboratory ballistics testing conducted by the Philadelphia Police Department's Office of Forensic Science Firearms Identification Laboratory and comparison and correlations conducted by the National Integrated Ballistics Information Network (NIBIN) on ballistics evidence recovered from multiple shooting incident crime scenes, including a homicide, that occurred on December 17, 2021, February 1, 2022, June 1, 2022, and July 16, 2022, indicated that this particular firearm, a Glock model 23 .40 caliber firearm purchased by Tyrone Gresham from Delia's on April 29, 2021, was in fact the firearm used in the aforementioned shooting incidents.

Summary

66. Based on the foregoing information and analysis, it is my expert opinion that the employees of Delia's Gun Shop, a Federally Licensed Firearms dealer, should have recognized the various straw purchasing red flag indicators exhibited by firearms purchasers Charles L. Thompson, Emmitt M. Smith, Anthony Cipriano (a/k/a "W [REDACTED] M [REDACTED]"),

Gregg Dreghorn, Akeira N. Harcum, Robert Otis Cooper, Anthony Figuero-Marko, and Tyrone Gresham, as set forth in greater detail above, and should have denied the various firearms purchases.

67. Furthermore, Charles L. Thompson, Emmitt M. Smith, and Anthony Cipriano (aka “W [REDACTED] M [REDACTED]”) were each linked to a firearm they individually purchased from Delia’s via laboratory ballistics testing and analysis conducted by the Philadelphia Police Department’s Office of Forensic Science Firearms Identification Laboratory and comparison and correlations conducted by the National Integrated Ballistics Information Network (NIBIN), to ballistics evidence recovered from shooting incident crime scenes.

IV. Straw Purchasing at WRT Management, Inc. f/k/a Tanner’s Sports Center

68. I was asked by the City to review documentation for certain firearms transactions that occurred at WRT Management (Tanner’s) between 2019 and 2021 and to determine whether the transactions included indicators of straw purchasing.

Joshua Morales

69. An individual identified as Joshua Morales purchased twenty-four (24) firearms from WRT Management (Tanner’s) between February 21, 2020, and September 16, 2020. These purchases include seven (7) identical make, model, and caliber Taurus model G2C 9mm firearms, eleven (11) firearms purchased on the same day September 16, 2020 (three of which were identical make, model, and caliber Taurus model G2C 9mm firearms), two additional Taurus model G2C 9mm firearms purchased in a single day on September 8, 2020, and several other multiple-handgun purchases (three firearms purchased on July 30, 2020, and two firearms each purchased on June 11, 2020, July 8, 2020, and August 22, 2020). One of the firearms purchased by Morales on July 30, 2020, was a Sig Sauer model MCX 300 Blackout caliber

firearm that WRT Management (Tanner's) sold for approximately \$1,500.00. The June 11 and July 8 multiple purchases by Joshua Morales both included one Taurus model G2C 9mm firearm, and Morales also purchased a similar Taurus Model G3C 9mm firearm on August 6, 2020. In my expert opinion and professional experience, the Taurus family of firearms is relatively inexpensive and considered by most avid firearms aficionados to be of lesser quality than other popular, more expensive firearms brands. Morales made cash purchases during seven (7) of his transactions at WRT Management (Tanner's), totaling approximately \$3,900.

70. Based on my training and experience, it is my opinion that Joshua Morales exhibited common red flag indicators of being a straw purchaser engaged in illegal firearms trafficking, including purchasing multiple firearms of the same make, model, and caliber, and purchasing multiple firearms in a relatively short period of time, including an eleven firearm purchase (of which three were identical Taurus model G2C 9mm firearms), six other multiple firearm transactions (one of which was a purchase of two additional Taurus model G2C 9mm firearms on September 8, 2020, only eight days prior to the eleven firearm purchase). Morales' payment using large amounts of cash was a further red flag indicator of straw purchasing.

71. It is my opinion that Joshua Morales' exhibition of common red flag indicators of straw purchasing should have been readily recognizable by employees of WRT Management (Tanner's), who per deposition and the promulgated responsibilities of FFL employees, had been or should have been trained to recognize red flag indicators of likely straw purchasing. Three WRT Management (Tanner's) employees—William S., Shaun C., and Dan W.—were each involved in a pair of transactions with Morales, and therefore either did or should have recognized his suspicious purchasing activity. Based on these indicators, it is my opinion that

WRT Management (Tanner's) knew or should have known that Morales was a likely straw purchaser.

72. Based on my review of Philadelphia Police Department records, one Springfield model XD 40 9mm firearm that Joshua Morales purchased from WRT Management (Tanner's) was recovered by the Philadelphia Police Department on May 26, 2021, pursuant to encountering a stolen vehicle. The Springfield firearm was recovered from within the vehicle's trunk inside of a grey book bag and when researched, had been reported as stolen. Furthermore, this Springfield firearm was subject to forensic and ballistic examination by the Philadelphia Police Department Office of Forensic Science Firearms Identification Laboratory on March 3, 2022, when the Springfield firearm was test-fired for submission to the National Integrated Ballistic Information Network (NIBIN), and again between December 23 and 26, 2024, in relation to two separate criminal investigations, wherein this Springfield firearm was positively linked to a homicide and an aggravated assault. This Springfield firearm was purchased on February 21, 2020.

73. One Glock model 17 9mm firearm was recovered by the Philadelphia Police Department on November 4, 2021, pursuant to a "person with a gun" report. The firearm was found with an obliterated serial number. It should be noted that obliterating a firearm's unique serial number is a common practice of illicit firearms traffickers to make it difficult for law enforcement to effectively and efficiently trace the firearm through the ATF National Tracing Center if recovered. However, in this particular case, the Philadelphia Police Department Office of Forensic Science Firearms Identification Laboratory was able to successfully restore the Glock model 17 9mm firearm's obliterated serial number using chemical and physical restoration techniques. The restored serial number, BPGW814, is in fact the same serial number recorded by

WRT Management (Tanner's) as being the serial number on the Glock model 17 firearm purchased by Joshua Morales on July 30, 2020.

74. One FN (Fabrique Nationale Herstal) model 57 9mm firearm was recovered by the Philadelphia Police Department on March 17, 2021, pursuant to the execution of a search warrant, a search warrant that yielded 428 grams of cocaine and approximately one kilogram of heroin, in addition to this firearm. This FN model 57 firearm was purchased on September 16, 2020, by Joshua Morales from WRT Management (Tanner's).

75. One Glock model 17 9mm firearm was recovered by the Philadelphia Police Department on November 21, 2020, pursuant to a report of a found gun. This Glock firearm was purchased on September 16, 2020, by Joshua Morales from WRT Management (Tanner's).

76. One Glock model 19 9mm firearm was recovered by the Philadelphia Police Department on June 6, 2021, pursuant to a report of a vehicle illegally parked on a sidewalk. Further research revealed that the Glock firearm had been reported as stolen, and the Glock firearm's slide had been illegally modified to allow fully automatic fire and was therefore technically classified as a machine gun. This Glock firearm was purchased on September 16, 2020, by Joshua Morales from WRT Management (Tanner's).

77. One Smith and Wesson model M & P 40 Shield .40 caliber firearm was recovered by the Philadelphia Police Department on January 15, 2021, pursuant to a parked vehicle investigation, in the possession of a passenger who was carrying the firearm in a concealed manner. This Smith and Wesson firearm was purchased on September 16, 2020, by Joshua Morales from WRT Management (Tanner's).

78. One Springfield model XDS .45 caliber firearm was recovered by the Philadelphia Police Department on July 12, 2023, pursuant to a vehicle stop. The Springfield

firearm was recovered from a black bag on the vehicle's rear seat floor. This Springfield firearm was purchased on September 16, 2020, by Joshua Morales from WRT Management (Tanner's).

79. Based on my training and experience, the fact that at least seven (7) of the firearms purchased from WRT Management (Tanner's) by Joshua Morales were recovered by the Philadelphia Police Department with a short "time-to-crime", including at least one firearm linked to a shooting incident/violent crime, another with an obliterated serial number, and another modified to be an illegal machine gun, is additional confirmation that these firearms were straw purchased and illegally trafficked.

Nafez Hutchings

80. An individual identified as Nafez Hutchings purchased twelve (12) firearms between August 17, 2020, and August 24, 2020, a time period of only seven days, including seven different Glock firearms. Nafez Hutchings purchased five .45 caliber firearms, three .40 caliber firearms, and two 9mm firearms, in addition to a .22 caliber Glock firearm and a Del-Ton 5.56mm firearm. In my expert opinion and professional experience, it is highly unusual to purchase ten firearms, five in .45 caliber, three in .40 caliber, and two in 9mm, in a single seven-day period. In addition, purchasing eight Glock firearms in a single seven-day period, including four different .45 caliber variants, is also very uncommon—and quite expensive. Furthermore, Hutchings paid all in cash for these transactions, totaling approximately \$4,900.

81. Based on my training and experience, it is my opinion that Nafez Hutchings exhibited common red flag indicators of being a straw purchaser engaged in illegal firearms trafficking, including purchasing multiple firearms of the same make and/or caliber, purchasing a large number of firearms in a short period of time (including four multiple firearm transactions within a single seven-day period), and paying with large amounts of cash.

82. It is my opinion that Nafez Hutchings' exhibition of common red flag indicators of straw purchasing should have been readily recognizable by employees of WRT Management (Tanner's), who per deposition and the promulgated responsibilities of FFL employees, had been or should have been trained to recognize red flag indicators of likely straw purchasing. Based on these indicators, it is my opinion that WRT Management (Tanners) knew or should have known that Hutchings was a likely straw purchaser.

83. Based on my review of Philadelphia Police Department records, one Springfield model XD .45 caliber firearm, with an obliterated serial number, was recovered by the Philadelphia Police Department on June 25, 2021, pursuant to the execution of a search warrant. It should be noted that obliterating a firearm's unique serial number is a common practice of illicit firearms traffickers to make it difficult for law enforcement to effectively and efficiently trace the firearm through the ATF National Tracing Center if recovered by law enforcement. This Springfield firearm was purchased on August 17, 2020, by Nafez Hutchings from WRT Management (Tanner's).

84. One Glock model 44 .22 caliber firearm, with an obliterated serial number, was recovered by the Philadelphia Police Department on January 8, 2021, pursuant to the execution of a search warrant. It should be noted that obliterating a firearm's unique serial number is a common practice of illicit firearms traffickers to make it difficult for law enforcement to effectively and efficiently trace the firearm through the ATF National Tracing Center if recovered by law enforcement. However, in this particular case, the Philadelphia Police Department Office of Forensic Science Firearms Identification Laboratory was able to successfully restore the Glock model 44 .22 caliber firearm's obliterated serial number using chemical and physical restoration techniques. The restored serial number, AEFY913, is in fact

the same serial number recorded by WRT Management (Tanner's) as being the serial number on the Glock model 44 firearm purchased by Nafez Hutchings on August 17, 2020, from WRT Management (Tanner's).

85. One Glock model 30 .45 caliber firearm was recovered by the Philadelphia Police Department on June 22, 2022, pursuant to a vehicle stop. The Glock firearm was recovered from beneath the driver's seat. This Glock firearm was purchased by Nafez Hutchings on August 17, 2020, from WRT Management (Tanner's). Furthermore, ballistic testing and examination conducted by the Philadelphia Police Department Office of Forensic Science Firearms Identification Laboratory and microscopic examination, analysis and correlation performed by the National Integrated Ballistic Information Network (NIBIN) system between December 16 and 19 2024, conclusively linked this Glock firearm to a homicide.

86. Philadelphia Police Department records indicate that a Glock model 21SF .45 caliber firearm purchased by Nafez Hutchings on August 20, 2020, from WRT Management (Tanner's) was recovered by law enforcement. Furthermore, ballistic testing and examination conducted by the Philadelphia Police Department Office of Forensic Science Firearms Identification Laboratory link this firearm to a shooting on or about September 17, 2020.

87. Philadelphia Police Department records also indicate that a Glock model 30S .45 caliber firearm purchased by Nafez Hutchings on August 20, 2020, from WRT Management (Tanner's) was recovered by law enforcement.

88. Philadelphia Police Department records also indicate that a Del-Ton DTI-15 5.56mm firearm purchased by Nafez Hutchings on August 24, 2020, from WRT Management (Tanner's) was recovered by law enforcement.

89. One Glock model 21 .45 caliber firearm, with an obliterated serial number, was submitted to the Philadelphia Police Department Office of Forensic Science Firearms Identification Laboratory on June 10, 2021. It should be noted that obliterating a firearm's unique serial number is a common practice of illicit firearms traffickers to make it difficult for law enforcement to effectively and efficiently trace the firearm through the ATF National Tracing Center if recovered by law enforcement. However, in this particular case, the Philadelphia Police Department Office of Forensic Science Firearms Identification Laboratory was able to partially restore the Glock model 21 .45 caliber firearm's obliterated serial number using chemical and physical restoration techniques. The partially restored serial number, MRN--9, is quite similar to the serial number recorded by WRT Management (Tanner's), MRN459, as being the serial number on the Glock model 21 firearm purchased by Nafez Hutchings on August 24, 2020, from WRT Management (Tanner's).

90. Based on my training and experience, the fact that at least seven (7) of the firearms purchased from WRT Management (Tanner's) by Nafez Hutchings were recovered by the Philadelphia Police Department, many with a short "time-to-crime", including at least one firearm linked to a shooting incident/violent crime, and others with obliterated serial numbers, is additional confirmation that these firearms were straw purchased and illegally trafficked.

Tyrone Dansby

91. An individual identified as Tyrone Dansby purchased nine (9) firearms between May 8, 2020, and August 31, 2020. All of these firearms were 9mm caliber, and seven of the nine were Taurus firearms (three model G3 firearms, three model G2C firearms, and one model G3C firearms). The other two firearms purchased by Tyrone Dansby were a Glock model 17 9mm firearm and a Smith and Wesson M & P 40 Shield 9mm firearm. In my expert opinion and

professional experience, the Taurus family of firearms is relatively inexpensive and considered by most avid firearms aficionados to be of lesser quality than other popular, more expensive firearms brands. Furthermore, all of Tyrone Dansby's firearms were multiple purchases: two Taurus model G3 9mm firearms on May 8, 2020; two Taurus model G2C 9mm firearms on May 13, 2020 (only five days later); one Taurus model G3 9mm firearm and one Glock model 17 9mm firearm on May 20, 2020 (only seven days after the second multiple purchase on May 13, 2020 and twelve days after the initial multiple purchase on May 8, 2020); and finally a Taurus model G2C 9mm firearm, a Taurus Model G3C 9mm firearm, and a Smith and Wesson M & P 40 Shield 9mm firearm on August 31, 2020. Dansby also paid all in cash for these firearms, for a total amount of approximately \$3,000.

92. Based on my training and experience, it is my opinion that Tyrone Dansby exhibited common red flag indicators of being a straw purchaser engaged in illegal firearms trafficking, including purchasing multiple firearms of the same make, same or similar model and/or caliber (seven of the nine firearms purchased by Tyrone Dansby were Taurus 9mm firearms, and all of the firearms purchased by Tyrone Dansby were 9mm firearms), purchasing multiple firearms at once (including two Taurus G3 9mm firearms on May 8, 2020, and two Taurus G2C 9mm firearms on May 13, 2020), purchasing a large number of firearms in a short period of time (six total firearms within a twelve-day period), and paying with large amounts of cash.

93. It is my opinion that Tyrone Dansby's exhibition of common red flag indicators of straw purchasing should have been readily recognizable by employees of WRT Management (Tanner's), who per deposition and the promulgated responsibilities of FFL employees, had been or should have been trained to recognize red flag indicators of potential straw purchasing. Based

on these indicators, it is my opinion that WRT Management (Tanners) knew or should have that Dansby was a likely straw purchaser.

* * *

I verify that the statements in this expert witness report are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to the authorities.

/s/Andrew Traver
Andrew Traver
November 3, 2025

Andrew Traver

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- ▶ Senior Executive Leadership
- ▶ Extensive Federal Law Enforcement Experience
- ▶ Highly Effective Change Agent
- ▶ Organizational Transformation
- ▶ Charismatic Motivational Speaker
- ▶ International Ambassador & Team Builder
- ▶ Resilience and Suicide Prevention Advocate
- ▶ Problem Solving/Conflict Resolution Expertise

Higher Education Experience

Executive in Residence, Metropolitan State University,
Denver, CO 2019-Present

- Executive in Residence, Criminal Justice and Criminology Department Faculty
- Special Leadership Development Advisor to the President of MSU Denver
- Instructor for “American Gangsters” and “Federal Law Enforcement” upper-level Criminal Justice elective courses
- Assisted MSU Denver President Davidson as a member of the COVID-19 Emergency Budget Reconciliation Committee
- Provided Organizational Leadership Training for the Western Fasteners Association on behalf of a member of the MSU Denver Board of Trustees
- Keynote speaker for the MSU Denver Veteran Student 2022 Commencement.

Professional Law Enforcement Executive Performance Experience

DIRECTOR, Naval Criminal Investigative Service (NCIS), Quantico, Virginia

October 2013-June 2019

- Served as the fifth civilian Director (and only the second external selection) of the Naval Criminal Investigative Service (NCIS). Responsible for oversight of 2,000 employees, 1,200 sworn Federal Agents stationed in more than 190 locations around the world.
- Annual operating budget of approximately \$440 million dollars.
- Directed the agency as it investigated and defeated criminal, foreign intelligence and terrorist threats to the United States Navy and Marine Corps wherever they operated: ashore, afloat and in cyberspace.
- Worked as the senior executive for law enforcement, criminal investigation, counterintelligence and counterterrorism for the US Department of the Navy.
- Developed and expanded strong partnerships and liaison with law enforcement organizations, security services and intelligence agencies worldwide.
- Ensured agile, adaptive and responsive NCIS support to the Navy and Marine Corps’ enhanced security posture and global engagements.
- Chief Executive Office of a civilian command-frequent consultation and collaboration with high-level uniformed military professionals and Members of Congress.
- Developed excellent relationships with members of the career Senior Executive Service (SES) and political appointees in the Department of Defense and the intelligence community.
- Strengthened and advanced the NCIS organization by building morale, generating progressive leadership development, decentralizing decision-making and enhancing transparency, communication and trust.

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SPECIAL AGENT IN CHARGE, Denver, Colorado, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)

June 2012- October 2013

- Responsible for all Federal firearms, explosives, arson and violent crime investigations within the purview of ATF for the states of Colorado, Wyoming, Montana and Utah.
- Accountable for all firearms and explosives industry regulatory matters within those identified states.
- Executive oversight of a workforce of over one hundred personnel comprised of sworn Special Agent/Criminal Investigators, Industry Operations Investigators, State and local task force officers and professional support staff allocated across the four-state Rocky Mountain region.
- Directed the revitalization of intelligence support to criminal investigation functional protocol and facilitated the enhanced utilization of advanced firearms identification technology across the region.

SPECIAL AGENT IN CHARGE, Chicago, Illinois, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)

June 2004 – June 2012

- Responsible for all Federal firearms, explosives, arson and violent crime investigations within the purview of ATF for the state of Illinois, predominantly within the city of Chicago and adjacent communities.
- Directed oversight for all firearms and explosives industry regulatory matters.
- Executive oversight of a workforce of over 150 personnel comprised of sworn Special Agent/Criminal Investigators, Industry Operations Investigators, State and local task force officers and professional support staff.

Additional Professional Experience

ASSISTANT SPECIAL AGENT IN CHARGE, San Francisco, California; New Orleans, Louisiana, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Treasury

December 2001- June 2004, April 2000 – December 2001

SPECIAL AGENT, Office of Inspection, Washington, DC, Bureau of Alcohol, Tobacco, Firearms (ATF), United States Department of Treasury

November 1998 – April 2000

RESIDENT AGENT IN CHARGE, Camden, New Jersey; GROUP SUPERVISOR, Philadelphia, Pennsylvania, Bureau of Alcohol, Tobacco, Firearms (ATF), United States Department of Treasury

June 1993 – November 1998

SPECIAL AGENT, Chicago, Illinois, Bureau of Alcohol, Tobacco, Firearms (ATF), United States Department of Treasury

November 1987 – June 1993

Military Service

COMMISSIONED OFFICER, United States Navy, November 1985 – May 1987

Graduated Standing Third

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Education

Bachelor of Arts, 1985
Criminal Justice, *Summa Cum Laude*
NORTHERN ILLINOIS UNIVERSITY

AWARDS

2025	MSU Denver Career Catalyst Award
2019	Department of the Navy Distinguished Civilian Service Award
2018	Northern Illinois University Alumni Association Distinguished Alumni Award
2016	Department of the Navy Distinguished Civilian Service Award

KEYNOTE AND PUBLIC SPEAKING ENGAGEMENTS

Navy Officer Candidate School Graduation, Newport, Rhode Island
Federal Bureau of Investigation (FBI) National Academy, Quantico, Virginia
The Royal College of Defense Studies, British Embassy, Washington, DC
The George C. Marshall Center for European Security Studies, Garmisch, Germany
The Australian Sport Anti-Doping Authority (ASADA), Canberra, Australia
Northern Illinois University, DeKalb, Illinois
University of Virginia, Charlottesville, Virginia
Colorado State University, Fort Collins, Colorado
University of Colorado, Boulder, Colorado
Metropolitan State University, Denver, Colorado
Veteran's Day 2019 Commemoration, Denver, Colorado
CBS Television "NCIS-The Cases They Can't Forget," New York City, New York

VOLUNTEER EXPERIENCE

-The Mission Continues – Veteran Outreach Coordinator - mentored and supported wounded warriors from Operation Iraqi Freedom; assisted them in finding meaningful volunteer opportunities, effectively reintroducing them to civilian society.

-ZERO, the Project to End Prostate Cancer - Survivor/Advocate for men diagnosed with and surviving prostate cancer.

-Certified as a QPR ("Question, Persuade, Refer") Suicide Prevention "Gatekeeper" Instructor by the QPR Institute (three-year certification); also, a certified QPR Gatekeeper.

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-Participated in joint NCIS-Denver Police/Fire Departments Advanced Peer Support Training as a featured vicarious/secondary trauma PTSD presenter (2024).

-Buckley Air Force Base Annual Suicide Awareness/Prevention Day Facebook Live Event (2020)-
Keynote Presentation via Facebook Live

-Fortem Australia – previously served as an “Ambassador-at-Large;” conducted a “Surviving with and Recovering from PTSD” online seminar for Australian first responders.