

EXHIBIT M

GARY KLECK, Ph.D.

Heller, et al v. District of Columbia, et al.

7/2/2013

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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DICK ANTHONY HELLER, et al., :

Plaintiffs, :

vs. : Civil Action No.

DISTRICT OF COLUMBIA, et al., : 08-01289 (JEB)

Defendants. :

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July 2, 2013

Washington, D.C.

Deposition via Skype of:

GARY KLECK, Ph.D.

a witness called for examination by counsel for Defendants in the above-entitled matter pursuant to notice, taken at Office of the Attorney General, 441 4th Street, N.W., Conference room 6N065, Washington, D.C. 20001, before Thomas W. Olender, Court Reporter and Notary Public in and for the District of Columbia.

GARY KLECK, Ph.D.**Heller, et al v. District of Columbia, et al.****7/2/2013**

26	<p>1 on which Webster relies pertain to handguns or do</p> <p>2 not distinguish between handguns and long guns.</p> <p>3 And you said that, right?</p> <p>4 A Page 3 somewhere?</p> <p>5 Q Yes.</p> <p>6 A Oh, okay. And I see it, yes.</p> <p>7 Q Okay. Now, have you and your studies</p> <p>8 distinguished between handguns and long guns?</p> <p>9 A In some studies, yes.</p> <p>10 Q Which ones?</p> <p>11 A Well, I wrote a piece called, let's see,</p> <p>12 "Handgun-Only Bans: A Disaster in the Making,"</p> <p>13 or something to that effect, and it was certainly</p> <p>14 focused on the distinction between hand guns and</p> <p>15 long guns. And certainly, in passing, I have</p> <p>16 many times made separate references to numbers of</p> <p>17 homicides committed with handguns versus number</p> <p>18 of homicides committed with long guns.</p> <p>19 Certainly, you'll find references to that</p> <p>20 throughout Point Blank and Targeting Guns.</p> <p>21 Q Is it important to distinguish between</p> <p>22 those two types of guns?</p>	28	<p>1 and long guns should be regulated differently?</p> <p>2 A It depends on the regulation you're</p> <p>3 talking about. Generally speaking, I think</p> <p>4 background checks, for example, ought to cover</p> <p>5 both handguns and long guns. So my general</p> <p>6 position would be I wouldn't say it applies</p> <p>7 necessarily to every single kind of regulation,</p> <p>8 but my general position would be, yes, they ought</p> <p>9 to apply to the full array of firearms.</p> <p>10 Q Can you think of a regulation type that</p> <p>11 would be different between a long gun and a</p> <p>12 handgun, in your opinion?</p> <p>13 A That are or should be different?</p> <p>14 Q That should be. You said, generally,</p> <p>15 they should be the same, but there might be</p> <p>16 instances where they shouldn't be, and I'm trying</p> <p>17 to think of what those might be.</p> <p>18 A Well, could you repeat the question,</p> <p>19 please?</p> <p>20 Q Sure. You said, generally, you think</p> <p>21 long guns and handguns should be regulated the</p> <p>22 same as far as general requirements like</p>
27	<p>1 A It is if you're going to make an</p> <p>2 assertion about extending restrictions to</p> <p>3 covering long guns as distinct from only</p> <p>4 handguns.</p> <p>5 Q Dr. Kleck, which type of gun is more</p> <p>6 lethal?</p> <p>7 A Long guns, on average.</p> <p>8 Q Why is that?</p> <p>9 A Different reasons for different types of</p> <p>10 long guns. In connection with shotguns, they</p> <p>11 fire large numbers of pellets, each one of which</p> <p>12 creates its own wound cavity in the victim's</p> <p>13 body, and so that's more likely to intersect</p> <p>14 vital organs that could result in a death.</p> <p>15 In the case of rifles, the bullets</p> <p>16 generally are longer, and when they tumble and</p> <p>17 hit the victim's body sideways, they'll create a</p> <p>18 larger wound cavity and therefore be more likely</p> <p>19 to intersect a vital organ of the victim's body.</p> <p>20 They also generally travel at a higher velocity</p> <p>21 than most handgun rounds.</p> <p>22 Q Do you think, Dr. Kleck, that handguns</p>	29	<p>1 background checks, and I took from that, that you</p> <p>2 thought there might be some instances where they</p> <p>3 should be regulated differently, and I am trying</p> <p>4 to figure out what; if you can think of examples</p> <p>5 in your opinion where they should be regulated</p> <p>6 differently, what those would be.</p> <p>7 A Offhand, I can't think of any.</p> <p>8 Q Okay. Now, Dr. Kleck, it's true, isn't</p> <p>9 it, that gun ownership is higher in rural areas</p> <p>10 than it is in cities?</p> <p>11 A Yes.</p> <p>12 Q Now, does that fact suggest to you that</p> <p>13 guns in rural areas should be regulated</p> <p>14 differently than guns in cities?</p> <p>15 A No.</p> <p>16 Q And why not?</p> <p>17 A Because guns can be either used for good</p> <p>18 purposes or bad purposes in both urban areas and</p> <p>19 rural areas.</p> <p>20 Q All right. Dr. Kleck, you criticized Dr.</p> <p>21 Webster's discussion of the District's</p> <p>22 requirements that a firearm registrant appear in</p>

8 (Pages 26 to 29)