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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

IN RE: )  
)  
)  
NATIONAL RIFLE ) Case No.  
ASSOCIATION OF AMERICA ) 21-30085-hdh-11  
AND SEA GIRT, LLC, )  
)  
Debtors. )

\*\*\*\*\*

REMOTE ORAL AND VIDEOTAPED DEPOSITION OF  
WAYNE LAPIERRE  
VOLUME 2  
IN HIS INDIVIDUAL CAPACITY AND  
AS CORPORATE REPRESENTATIVE OF  
THE NATIONAL RIFLE ASSOCIATION OF AMERICA  
MARCH 23, 2021

CONFIDENTIAL PURSUANT TO PROPOSED PROTECTIVE ORDER  
\*\*\*\*\*

1 REMOTE ORAL AND VIDEOTAPED DEPOSITION OF WAYNE  
2 LAPIERRE, produced as a witness at the instance of the  
3 New York State Office of the Attorney General, and  
4 duly sworn, was taken remotely in the above-styled  
5 and numbered cause on the 23rd day of March, 2021, from  
6 9:10 a m to 5:53 p m , via Zoom, before Julie C  
7 Brandt, RMR, CRR, and CSR in and for the State of Texas,  
8 reported by machine shorthand, with the witness located  
9 in Fairfax, Virginia, pursuant to the Federal Rules of  
10 Civil Procedure and the provisions stated on the record  
11 or attached hereto  
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David Dell'Aquila (Remote appearance)

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1 Rocky Marshall (Remote appearance)  
 2 Melanie Montgomery (Remote appearance)  
 3 Kymberlee Milligan (Remote appearance)  
 4  
 5 VIDEOGRAPHER:  
 6 Dan Reidy - Veritext Legal Solutions  
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 23 meeting of the board of  
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 2 Motion to Dismiss the Chapter  
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 3 in the alternative, Motion  
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 4 Chapter 11 Trustee, (2) The  
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1 PROCEEDINGS  
2 THE VIDEOGRAPHER: Good morning. We are  
3 going on the record at 9:10 a.m. on Tuesday, March 23,  
4 2021. This is day 2 of the video recorded deposition of  
5 Wayne LaPierre.  
6 You may proceed, Counsel.  
7 WAYNE LAPIERRE,  
8 having been previously duly sworn and having confirmed  
9 that he is Wayne LaPierre, testified further as follows:  
10 MR. GARMAN: Jim, you're muted.  
11 EXAMINATION CONTINUED  
12 BY MR. SHEEHAN:  
13 Q. Good morning, Mr. LaPierre.  
14 A. Good morning.  
15 Q. You'll recall from yesterday that you were --  
16 that you swore an oath to tell the truth, the whole  
17 truth and nothing but the truth. Do you recall that?  
18 A. I do.  
19 Q. And do you agree to continue to tell the  
20 truth, the whole truth and nothing but the truth?  
21 A. I do.  
22 Q. Excellent.  
23 After your testimony yesterday, which was a  
24 long day, is there any of your testimony that thinking  
25 back you believe is incorrect?

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1 A. The only thing I would add is in terms of who  
2 knew about the fact that we were going to file for the  
3 bankruptcy. Andrew Arulanandam in our PR department  
4 also was aware of that several days out.  
5 Q. So that's like the 12th or the 13th of January  
6 of 2021?  
7 A. It was before that. I think he was aware of  
8 the possibility that we would do it probably a week  
9 before or something like that.  
10 Q. So January 7th, January 8th?  
11 A. After the board meeting, yeah, he was aware of  
12 it.  
13 Q. Did you tell him yourself that there was a  
14 possibility of bankruptcy?  
15 A. I think we discussed it, and I also think he  
16 discussed it with Travis with the Brewer firm, the PR  
17 person with the Brewer firm.  
18 Q. And apart from that -- that issue with respect  
19 to Andrew Arulanandam was there any other part of your  
20 testimony that you wanted to correct from yesterday?  
21 A. No, I think that's it.  
22 Q. Now Mr. LaPierre, is it accurate that your  
23 first contact with the Neligan firm was in January of  
24 2021?  
25 A. That would be correct.

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1 Q. Okay. And your first payment to the Neligan  
2 firm was in January 2021?  
3 A. I believe that would have been out of the  
4 trust account. So whenever that was, that was made out  
5 of the trust account. I don't know the exact date. It  
6 would -- I just don't know the date, the first date it  
7 was made out of the trust account.  
8 Q. Okay. Was anyone authorized to make payments  
9 out of the trust account besides you at the NRA?  
10 MR. GARMAN: Objection to form.  
11 A. I think the -- the Brewer firm was offered --  
12 authorized to make payments out of that trust account.  
13 Q. (BY MR. SHEEHAN) Without consulting with you?  
14 A. To people that we had retained, they were --  
15 they were, yes.  
16 Q. So you would agree with me that if they were  
17 not retained, the Brewer firm could not make payments  
18 out of the trust account?  
19 MR. GARMAN: Objection to the form.  
20 A. Well, we retained the Neligan firm, and the  
21 money was set aside to make -- to make payments in  
22 regards to the reorganization and reorganization  
23 matters.  
24 Q. (BY MR. SHEEHAN) And that was in January of  
25 2021?

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1 MR. GARMAN: Objection to form.  
2 A. I don't know the exact date that the trust  
3 account was set up, but, I mean, I know that we  
4 interviewed the Neligan firm down in Dallas after the --  
5 during the board meeting weekend, I did along with the  
6 SLC, and we agreed to retain them. And that's when that  
7 took place.  
8 Q. (BY MR. SHEEHAN) And remind me again. Did  
9 you talk to any other law firm besides the Neligan firm  
10 before you decided to retain the Neligan firm for the  
11 bankruptcy proceedings?  
12 MR. GARMAN: Objection to form.  
13 A. No, I did not. They were recommended by the  
14 Brewer firm and we interviewed them and we were all very  
15 impressed with them and we agreed to retain them.  
16 Q. (BY MR. SHEEHAN) Who was the "we" who  
17 interviewed the Neligan firm?  
18 A. Charles Cotton and Willes Lee, and I believe  
19 Carolyn Meadows was there also, although I'm not sure of  
20 that. She may not have been.  
21 Q. Did you make -- okay. Did you make any notes  
22 or a summary of the conversation with the Neligan firm  
23 before you hired them?  
24 A. I did not. I sat in on a meeting with them.  
25 Q. Did anybody else from the special litigation

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1 committee do that, make a summary or notes of the  
2 meeting?  
3 MR. GARMAN: Objection to form.  
4 A. I'm honestly not sure. I know that I sat  
5 there and listened to them, and they did a presentation,  
6 they talked. And that's what I did.  
7 Q. (BY MR. SHEEHAN) All right.  
8 MR. SHEEHAN: Jonathan, can you mark  
9 Exhibit 7? Thank you.  
10 (Exhibit 7 marked.)  
11 Q. (BY MR. SHEEHAN) So at this point we have  
12 Exhibit 7. Could you pull up Exhibit 7, please?  
13 MR. GARMAN: Yeah, one second. I don't  
14 see it.  
15 THE REPORTER: It's in the second day.  
16 MR. GARMAN: Oh, I didn't see the date.  
17 Sorry about that. Okay.  
18 Okay. It's up.  
19 Q. (BY MR. SHEEHAN) All right. If you would  
20 take -- this will -- do you know that this is part of  
21 the statement of financial affairs for the NRA that was  
22 filed with the bankruptcy court in Texas?  
23 A. I did not. I have not seen this.  
24 Q. If you look at line 1, 2, 3, 4, you'll see  
25 under who was paid or who received the transfer, it says  
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1 Neligan, LLP. Do you see that?  
2 A. I do see that.  
3 Q. And then if you look across date of payment,  
4 it says December 3, 2020. Do you see that?  
5 A. I do.  
6 Q. Do you know whether Neligan was paid on  
7 December 3, 2020, \$350,000?  
8 A. I don't. I'm not aware of that.  
9 Q. You'll see in the footnotes to that Neligan,  
10 LLP statement, this payment was made out of funds  
11 transferred to Brewer, Attorneys & Counselors by the NRA  
12 for payment of third party expenses. Do you see that?  
13 A. I do see that.  
14 Q. Did you authorize the Brewer firm to pay  
15 Neligan in December of 2020?  
16 MR. GARMAN: Objection to form.  
17 Go ahead.  
18 A. I knew that the trust account was going to be  
19 used to -- in terms of matters involving the  
20 reorganization, but I did not -- and that would be  
21 managed by the Brewer firm, that trust account, but I  
22 don't -- I don't think I was -- I don't think I was  
23 aware of that payment at that point.  
24 Q. (BY MR. SHEEHAN) To your knowledge, did the  
25 Brewer firm have the authority to retain outside counsel  
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1 without your approval?  
2 MR. GARMAN: Objection to form.  
3 A. That is a -- is more of a legal issue. I  
4 don't know whether they would or not. I know they -- I  
5 know they were going to be working with people to  
6 prepare for the reorganization, and I just did not get  
7 involved in the specifics of who they were working with  
8 to prepare for the reorganization. I knew they were  
9 retaining some people to work on the reorganization. I  
10 did not know -- I did not meet the Neligan firm until,  
11 as I said, down in Dallas in January.  
12 Q. (BY MR. SHEEHAN) Did the NRA retain the  
13 Neligan firm on or before December 3, 2020 to represent  
14 them in anything?  
15 MR. GARMAN: Objection to form.  
16 Go ahead.  
17 A. Not that I'm aware of.  
18 Q. (BY MR. SHEEHAN) Okay. Did you have any  
19 discussions with the special litigation committee about  
20 retaining the Neligan firm before January of 2021?  
21 A. The discussions I had with the special  
22 litigation committee were in Dallas when we -- we met  
23 the Neligan firm and interviewed them. And I think I  
24 had heard the name Neligan firm tossed around. I think  
25 the SLC had heard the name Neligan firm, but I had not  
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1 met them and we hadn't interviewed them until then.  
2 Q. Do you know if there was a retainer agreement  
3 between the NRA and the Neligan firm before January of  
4 2021?  
5 A. I don't.  
6 Q. Who has to sign off at the NRA to retain  
7 outside counsel?  
8 A. The general counsel would. The treasurer  
9 would. I don't know whether in this particular  
10 instance, where we had a trust set aside for the Brewer  
11 firm to retain people, that -- that it would be  
12 necessary in terms of reorganization. It required  
13 confidentiality. I don't know whether that would --  
14 would come under an exception to that.  
15 I mean, the trust fund was set up so the  
16 Brewer firm could retain certain people in regard to the  
17 reorganization. That was the purpose of it.  
18 Q. So when you gave \$5 million to the Brewer firm  
19 for trust account, what were the terms of the payment to  
20 the trust account?  
21 MR. GARMAN: Objection to form.  
22 Go ahead.  
23 A. That the Brewer firm I know would keep an  
24 accounting of it that would be available for the NRA  
25 to -- it would be disclosed to the NRA.  
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1 Q. (BY MR. SHEEHAN) Was there complete  
2 discretion on the Brewer firm to spend the money in the  
3 trust account on whatever they believed was appropriate?  
4 MR. GARMAN: Objection to form.  
5 A. I think the Brewer firm had -- had discretion  
6 in terms of -- in terms of managing this issue, in terms  
7 of to retain people in regard to the reorganization  
8 and --  
9 Q. (BY MR. SHEEHAN) Who --  
10 A. -- in a confidential way.  
11 Q. Confidential from whom?  
12 A. Well, confidential because it -- obviously, we  
13 did not want any of this leaked, so this seemed to be a  
14 way to -- to facilitate the purpose of the objective of  
15 setting aside some dollars so that it would be available  
16 for retention of people, if needed, on a reorganization  
17 and in a confidential way.  
18 Q. So you gave -- you, the NRA, gave complete  
19 discretion to the Brewer firm to decide how to spend  
20 that \$5 million in the trust account. Is that accurate?  
21 MR. GARMAN: Objection to form of the  
22 question.  
23 A. No. They would -- they agreed to keep track  
24 and provide -- provide accounting of it in terms of  
25 where the money -- where the money ended up being spent.  
Page 262

1 Q. (BY MR. SHEEHAN) So I understand -- I  
2 understand that they would report back to you once they  
3 had spent it, but before they spent the money that was  
4 in the trust account, did they have to get approval from  
5 anybody at the NRA?  
6 A. I think they had -- they had a significant  
7 amount of trust placed in them that they would take the  
8 appropriate steps to retain the people that were needed  
9 in terms of the reorganization.  
10 Q. So is it fair to say, Mr. LaPierre, that you  
11 and your special litigation committee delegated to an  
12 outside organization the ability to spend \$5 million in  
13 charitable funds, period -- question mark?  
14 MR. GARMAN: Objection to the form of the  
15 question.  
16 A. We -- we set aside 5 million in a trust to be  
17 used in -- NRA did -- in regard to reorganization  
18 matters that was managed by the reorganization firm,  
19 that's correct.  
20 Q. (BY MR. SHEEHAN) When did you find out that  
21 the Neligan firm got \$350,000 in December 2020?  
22 A. You just showed it to me right here,  
23 Mr. Sheehan.  
24 Q. All right. What else did the Brewer firm  
25 spend money on out of that trust account?  
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1 MR. CORRELL: This is Kent Correll.  
2 Objection to the form.  
3 A. I'm not aware of -- it would be people needed  
4 to line up a team in terms of a reorganization, whether  
5 it was the restructuring officer, whether it was --  
6 whatever team needed to be put together in terms of  
7 resources, they -- that fund was set aside to be used to  
8 help retain that team.  
9 Q. (BY MR. SHEEHAN) Understood, but did you ever  
10 get a report from the Brewer firm describing what  
11 expenditures were made out of that escrow account, that  
12 trust account until today?  
13 MR. GARMAN: Objection to the form.  
14 MR. CORRELL: Yeah, and this is Kent  
15 Correll. I think you're beginning to go get into an  
16 area where you're asking for communications between --  
17 MR. SHEEHAN: I'm asking for the bills,  
18 but if that's an objection, please put the objection on  
19 the record.  
20 MR. CORRELL: The objection is that I'm  
21 cautioning you that you're asking questions that appear  
22 to be designed to --  
23 MR. SHEEHAN: This is a speaking  
24 objection. Please make your objection for the record.  
25 MR. CORRELL: You're now interrupting me.  
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1 MR. SHEEHAN: Because you're not  
2 participating appropriately.  
3 MR. CORRELL: I am a counsel. You have  
4 to let me speak, sir.  
5 My concern is that you are attempting to  
6 invade a privilege, and I am trying to ascertain how far  
7 you intend to go with this line of questioning. Now if  
8 you can please tell me how far you intend to go, I can  
9 make an assessment as to whether or not to direct my  
10 client not to answer any further questions. Please.  
11 Q. (BY MR. SHEEHAN) Mr. LaPierre, when did you  
12 give an accounting, if ever, from the Brewer firm  
13 concerning the money that was spent from the trust  
14 account of \$5 million that you authorized for them?  
15 MR. CORRELL: I am going to object on the  
16 grounds that your question appears to be designed to  
17 elicit confidential, attorney/client communications.  
18 And I am going to instruct the witness not to answer to  
19 the extent that his answer would require him to reveal  
20 any strategy -- any legal strategy or any legal advice  
21 he was seeking or obtaining from Brewer -- the Brewer  
22 firm.  
23 Q. (BY MR. SHEEHAN) Mr. LaPierre?  
24 MR. CORRELL: If you can answer the  
25 question without revealing any communications regarding  
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1 strategy, then please go ahead.  
2 A. Well, I have not -- I have not received an  
3 accounting of funds spent out of that -- that trust  
4 fund.  
5 Q. (BY MR. SHEEHAN) Thank you, Mr. LaPierre.  
6 Has anybody else, to your knowledge, at the  
7 NRA received an accounting of the funds spent out of the  
8 trust fund?  
9 A. I don't know whether Mr. Frazer has or  
10 Mr. Spray has. I mean, Mr. Frazer is the one that would  
11 receive all the Brewer bills, and I don't know whether  
12 he has or not, Mr. Sheehan.  
13 Q. Thank you, Mr. LaPierre.  
14 A. Yes, sir.  
15 MR. SHEEHAN: Could we go just off the  
16 record -- not off the record.  
17 Q. (BY MR. SHEEHAN) Mr. LaPierre, we're pulling  
18 up Exhibit 8.  
19 (Exhibit 8 marked.)  
20 Q. (BY MR. SHEEHAN) Do you have that?  
21 MR. GARMAN: It's still refreshing. We  
22 have it.  
23 Q. (BY MR. SHEEHAN) Mr. LaPierre, could you  
24 identify Exhibit 8, please?  
25 A. Well, I -- I wasn't in the room, so I am

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1 speculating on this, but --  
2 MR. GARMAN: I don't think there's a  
3 question pending.  
4 THE WITNESS: Okay.  
5 Q. (BY MR. SHEEHAN) Mr. LaPierre, can you  
6 identify Exhibit 8?  
7 A. It appears to be a resolution of the board of  
8 directors making -- making the special litigation  
9 committee an official committee of the board of  
10 directors.  
11 Q. Do you know if the board passed this  
12 resolution?  
13 A. I -- I was not in that session, Mr. Sheehan,  
14 when this was taken up. I believe they did. To the  
15 best of my knowledge, at that January meeting the board  
16 formally made the special litigation committee an  
17 official committee of the board of directors with the  
18 powers of the board.  
19 Q. Can you tell from looking at this document  
20 whether this is the resolution which was passed in  
21 January or is it something from earlier in the year in  
22 2020?  
23 A. I'm not sure because I -- I was not in the  
24 room when this was passed, so I'm not sure.  
25 Q. How did you, as the executive VP of the NRA,

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1 determine what the scope of authority of the special  
2 litigation committee was before the January board  
3 meeting?  
4 MR. GARMAN: Object to the form of the  
5 question.  
6 A. What I was advised by -- by --  
7 MR. GARMAN: Whoa. Whoa. Okay. If  
8 you're about to say counsel, I am going to object and  
9 instruct you not to reveal the contents of your  
10 communications with your attorneys.  
11 Q. (BY MR. SHEEHAN) Let's go back and try to do  
12 that without the counsel issue.  
13 You had an understanding, am I correct, that  
14 the special litigation committee was to oversee the  
15 litigation with the attorney general's office. Is that  
16 correct?  
17 A. Yes, sir, because John Frazer was named as a  
18 defendant, I was named as a defendant; therefore, we  
19 could no longer manage the litigation. So the special  
20 litigation committee was created to manage the  
21 litigation working with the attorneys.  
22 Q. Okay. Now it describes in the -- in this  
23 document, which you can't identify whether it is, in  
24 fact, a resolution of the NRA -- right? You can't --  
25 sitting here today, you can't tell me whether this is,

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1 in fact, a resolution of the NRA board?  
2 MR. GARMAN: Objection to form.  
3 A. Yes. Yes, sir, that's correct.  
4 Q. (BY MR. SHEEHAN) Okay. But it talks about in  
5 this document that there's a determination that  
6 Mr. Charles Cotton was independent, is that correct,  
7 from this document?  
8 MR. GARMAN: Objection to form.  
9 Q. (BY MR. SHEEHAN) Look at the third paragraph.  
10 It says each of whom has been determined to be  
11 independent.  
12 MR. GARMAN: Objection to form.  
13 Q. (BY MR. SHEEHAN) Do you see that line?  
14 A. Yes, I do see that. Each of whom has been  
15 determined to be independent and disinterested in all  
16 relevant aspects of their service -- yes, I see that.  
17 Q. (BY MR. SHEEHAN) Did -- to your knowledge,  
18 did the NRA ever make a determination that Carolyn  
19 Meadows, Charles Cotton and Willes Lee were independent  
20 and disinterested in all respects relevant to their  
21 service on the special litigation committee?  
22 MR. GARMAN: Objection, go ahead.  
23 A. I believe they made that determination, and  
24 that's why they were designated to be on the special  
25 litigation committee, is they were independent.

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1 Q. (BY MR. SHEEHAN) Who of -- who on the NRA  
2 made that determination that they were independent?  
3 A. Well, they were the -- they were the  
4 officers -- the three officers of the association. And  
5 when it was -- I think it naturally flowed to them, and  
6 I think they had discussions probably with -- with our  
7 counsels, and I know that I was -- I was aware of the  
8 fact that they were going to be the special litigation  
9 committee as officers.  
10 Q. Okay. With respect to the -- and again, you  
11 don't know where this document came from or what it's  
12 authority is, but was it your understanding that the  
13 special litigation committee was to exercise corporate  
14 authority on behalf of the NRA with respect to the  
15 attorney general's case against the NRA and the District  
16 of Columbia case against the NRA?  
17 MR. GARMAN: Objection to the form of the  
18 question.  
19 A. Yes. I -- I could not supervise that  
20 legislation (sic). John Frazer could no longer  
21 supervise that legislation or be involved in any of the  
22 management of it. And it was turned over to the special  
23 litigation committee to work with the -- with legal  
24 counsel in terms of the management of that litigation.  
25 And I have not been on, nor has John Frazer been on, any  
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1 of the phone calls or discussions since that -- since it  
2 was formed.  
3 Q. (BY MR. SHEEHAN) Okay. And you'll see the  
4 next -- on Roman numeral iv, it also includes any  
5 additional legal proceedings arising from the same  
6 facts, circumstances or allegations as the foregoing,  
7 wherein the potential for an actual or apparent conflict  
8 of interest favors recusal by one or more NRA  
9 executives.  
10 So in your opinion, does the bankruptcy  
11 raise, does the bankruptcy filing by the NRA, an  
12 additional legal proceeding arising from the same facts,  
13 circumstances, or allegations as the two attorney  
14 general suits?  
15 MR. GARMAN: Objection to form. That's  
16 the ultimate legal question for this case.  
17 Q. (BY MR. SHEEHAN) Mr. LaPierre?  
18 A. I'm looking at it. I just -- as -- I'm not an  
19 attorney. I just -- as I said before, I mean, John  
20 Frazer stepped aside in terms of dealing with -- with  
21 the special litigation committee in regards to the  
22 Chapter 11. It was felt because of my position that on  
23 that specific issue, the -- the executive vice  
24 president's office needed to be -- needed to be involved  
25 in that specific matter in terms of the Chapter 11,  
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1 which was kind of viewed as -- as -- I guess part of the  
2 flow of what was happening in New York, but it was also  
3 part of a different future to facilitate a merger into a  
4 place with a more favorable legal and where NRA could be  
5 treated more fairly. So they decided that -- I mean,  
6 that my office needed to be involved with that.  
7 Q. In your view, Mr. LaPierre, did the special  
8 litigation committee have responsibility for overseeing  
9 the decision to file this bankruptcy proceeding?  
10 MR. GARMAN: Objection to the form of the  
11 question.  
12 A. Well, the decision to file was made by -- I  
13 made it in consultation with -- with the SLC and in  
14 terms of the actual decision, let's go, let's do this.  
15 Q. (BY MR. SHEEHAN) Did you -- in your opinion,  
16 though, was the -- was this subject in which the special  
17 litigation committee as a special litigation committee  
18 had responsibility for making decisions?  
19 MR. GARMAN: Objection to the form of the  
20 question, calls for a legal conclusion.  
21 A. I think they had a -- I clearly think they had  
22 a role in it, and I clearly think I had a role in it in  
23 terms of my -- my role at the NRA. It was -- it was  
24 that significant of a matter.  
25 MR. SHEEHAN: Jon, could you pull up the  
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1 next exhibit, please?  
2 A. Because the board had delegated me at the  
3 board meeting, the -- to my office, the authority to  
4 reorganize, which is where the delegation came to -- to  
5 have me involved in it in terms of the executive VP's  
6 office.  
7 As I said, if they had not delegated that  
8 authority at that board meeting, I don't think I would  
9 have -- I would have proceeded with this. I don't know  
10 whether the SLC on its own would have proceeded or not,  
11 but I would not have had not they made that delegation  
12 of authority.  
13 Q. (BY MR. SHEEHAN) At this point can we pull up  
14 Exhibit 9?  
15 (Exhibit 9 marked.)  
16 MR. GARMAN: We have it.  
17 Q. (BY MR. SHEEHAN) All right. Mr. LaPierre,  
18 can you identify Exhibit 9, please?  
19 A. I'm sorry. We're looking at it, Mr. Sheehan.  
20 Q. Okay. Can you identify the document, please?  
21 A. Yeah, it is the document for filing  
22 bankruptcy.  
23 Q. And it's also a resolution on the board of  
24 directors of the NRA?  
25 MR. GARMAN: He hasn't looked at the  
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1 entire document. Give us a second.  
2 A. No, I -- yeah, that's the resolution -- yes,  
3 sir, that's the resolution that the board passed  
4 delegating to the executive vice president office the  
5 authority to reorganize the -- the association, and  
6 that's the authority under which my office anyway  
7 operated in terms of filing the bankruptcy petition  
8 along with the SLC.  
9 Q. (BY MR. SHEEHAN) All right. So is this  
10 document, Exhibit 9, is this a resolution of the board  
11 of directors?  
12 MR. GARMAN: Take your time and read the  
13 document to the extent you need to.  
14 A. Yeah, I believe that is the resolution of the  
15 board of directors that they passed.  
16 Q. (BY MR. SHEEHAN) And if you look down, you'll  
17 see that it cites -- when you say this is a resolution  
18 they passed, are you just talking about the fourth  
19 whereas clause or are you talking about the entire  
20 document?  
21 A. I'm talking about the whereas clause. As I  
22 said, I wasn't in the room when they -- when they passed  
23 this or when the discussions occurred. It -- I know  
24 that they passed the contract we talked about yesterday,  
25 and then they passed the resolution delegating to the  
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1 executive VP's office the ability to reorganize the  
2 association.  
3 Q. So --  
4 A. And I believe that --  
5 Q. So you believe this entire Exhibit 9 -- and I  
6 want to be clear here. You believe that Exhibit 9 in  
7 its entirety was approved by the board of directors of  
8 the NRA?  
9 A. Well, I -- again, I was -- I know that what  
10 the board of directors passed was a specific resolution  
11 authorizing the EVP the authority to reorganize the  
12 association, and I know the board passed a resolution  
13 making the special litigation committee an official  
14 committee of the board of directors with the power of  
15 the board of directors.  
16 Q. So when I look at Exhibit 9, whose resolution  
17 is it, the entirety of the document?  
18 A. The entirety of the document? It --  
19 MR. GARMAN: Take some time to look at  
20 this.  
21 Counsel, he hasn't read the entire document  
22 yet, so we're going to take the time to have him read  
23 the whole thing.  
24 MR. SHEEHAN: Let's go off the record and  
25 let him read the document and then come back. Let's  
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1 take a five-minute break.  
2 THE VIDEOGRAPHER: Off the record, the  
3 time on the video is 9:45 a.m.  
4 (Break from 9:45 a.m. to 9:51 a.m.)  
5 THE VIDEOGRAPHER: We're back on the  
6 record. The time on the video is 9:51 a.m.  
7 Q. (BY MR. SHEEHAN) All right. Mr. LaPierre,  
8 when we broke, you were looking at the resolution  
9 authorizing Chapter 11 reorganization and related  
10 retention of counsel. And do you have that document in  
11 front of you now?  
12 A. I do.  
13 Q. Do you know who wrote this document?  
14 A. I -- I assume it was written either by  
15 bankruptcy counsel or by -- by legal counsel from the --  
16 from the Brewer firm.  
17 MR. GARMAN: I'm going to instruct you  
18 not to speculate if you don't know the answer.  
19 A. I don't know specifically who wrote it.  
20 Q. (BY MR. SHEEHAN) Whose resolution is it?  
21 MR. GARMAN: Objection to form.  
22 A. It looks -- it -- it looks to be a filing of  
23 the bankruptcy proposal, but it contains language from a  
24 resolution passed by our board of directors, but then I  
25 believe it contains additional language that was  
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1 inserted in there also by -- by counsel.  
2 Q. (BY MR. SHEEHAN) I am looking at the page 5  
3 of 16, which is the exhibit here, and page 6. And then  
4 it says -- if you look at the bottom of the page,  
5 Mr. LaPierre, that I have it says -- can you see it?  
6 MR. GARMAN: Which page, 5 or 6?  
7 MR. SHEEHAN: 5.  
8 Q. (BY MR. SHEEHAN) And you see at the bottom  
9 that it says "Now, therefore, be it"?  
10 MR. GARMAN: No, that's not on page 5.  
11 MR. SHEEHAN: Jonathan, what do you  
12 think?  
13 Q. (BY MR. SHEEHAN) Mr. LaPierre, do you see the  
14 resolution authorizing Chapter 11 reorganization related  
15 retention of counsel, first page?  
16 A. The resolution authorizing retention of  
17 counsel on the first page? Yes, I do see that.  
18 Q. Resolution authorizing Chapter 11  
19 reorganization --  
20 A. Yes, sir, I see it.  
21 Q. Okay. Look at the very bottom of that page.  
22 Do you see what the last line is?  
23 A. I do. I do see that line.  
24 Q. And it says -- it says would advance the best  
25 interest -- let me go back a second.  
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1 It says "Now, therefore, be it." Do you see  
2 that?  
3 A. Yes, I do see it.  
4 Q. Okay. And then the next page on the version  
5 that I have is blank. Is it blank on your version, too?  
6 MR. GARMAN: No, it is not blank.  
7 A. No, and it goes on. Resolved that  
8 commencement of a Chapter 11 reorganization proceeding  
9 in the United States --  
10 (Reporter clarification.)  
11 A. There's additional three paragraphs that go  
12 on.  
13 Q. (BY MR. SHEEHAN) Were the three paragraphs in  
14 the document before you signed it?  
15 MR. GARMAN: Sorry, Counsel, you were  
16 muted for half that question.  
17 Q. (BY MR. SHEEHAN) Okay. Mr. LaPierre, the  
18 document that you signed, did it include those three  
19 revolved paragraphs?  
20 A. I believe it did.  
21 Q. If you look at the next page after the  
22 resolution authorizing Chapter 11 reorganization, the  
23 one that I have with your signature on it does not have  
24 those three resolutions. Is that -- is that accurate?  
25 MR. GARMAN: No. The exhibit you put in  
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1 front of him does.  
2 MR. SHEEHAN: Okay.  
3 MR. GARMAN: And Counsel, I'll point out  
4 for the record, it's the file stamped version from the  
5 Court's docket.  
6 Q. (BY MR. SHEEHAN) All right. When it says  
7 resolved, is that resolution -- the three "resolves"  
8 that are on that page after your signature page, are  
9 they the resolutions of the special litigation committee  
10 or you or both?  
11 MR. GARMAN: Objection to the form of the  
12 question. Counsel, they're before his signature, not  
13 after.  
14 MR. SHEEHAN: Okay. So my co-counsel  
15 tells me that the printer missorted the pages, so thank  
16 you for that.  
17 Q. (BY MR. SHEEHAN) But if you look at the three  
18 "resolves" in this document --  
19 A. Yes.  
20 Q. Whose resolutions were those?  
21 A. I think they were resolutions, the way the  
22 wording was, in terms of the filing for the bankruptcy.  
23 Those were not resolutions of our board of directors.  
24 Q. Okay. So who resolved -- I'm sorry, go ahead.  
25 A. I simply believe it's the way the wording was  
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1 put together by the -- by the attorneys that prepared  
2 the document for the filing.  
3 Q. So there was no -- was there any formal  
4 resolution with respect to the commencement of the  
5 Chapter 11 reorganization or retaining Neligan or  
6 retaining Brewer?  
7 MR. GARMAN: Objection to the form of the  
8 question.  
9 A. I know there was a meeting that we had in  
10 Dallas with the Neligan firm in terms of retaining them,  
11 and I know that we had numerous discussions with the  
12 special litigation committee in terms of doing all of  
13 this. I -- I don't know whether there was a formal  
14 resolution in terms of -- I mean, I -- this one right  
15 here is signed by me; it's not signed by Carolyn  
16 Meadows, Charles Cotton.  
17 MR. GARMAN: No, no, no, no, sir --  
18 MR. SHEEHAN: If I could, Mr. -- (audio  
19 unclear.)  
20 A. Yeah, they signed it. So that would -- that  
21 would substantiate my recollection that the -- all -- we  
22 had all of us discuss that all of us agreed to do it,  
23 and we did -- we made the decision to do it together.  
24 Q. (BY MR. SHEEHAN) As the committee of the  
25 board, does the special litigation committee keep  
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1 minutes of its activities?  
2 MR. GARMAN: Objection to the form of the  
3 question.  
4 A. I honestly am not sure of that because I  
5 haven't been involved with -- you'd have to -- you'd  
6 have to ask them, Mr. Sheehan.  
7 Q. (BY MR. SHEEHAN) Is there anyone who staffs  
8 the activities of the special litigation committee who  
9 is an employee of the NRA?  
10 A. Is there anyone staff that is an employee of  
11 the special litigation committee with --  
12 Q. No, let me try again.  
13 Is there anyone who is an employee of the NRA  
14 who staffs the work of the special litigation committee?  
15 MR. GARMAN: Objection to form.  
16 Go ahead.  
17 A. Not -- not specifically. I think -- I think  
18 Vanessa Shahidi has worked in terms of facilitating some  
19 of the matters from the attorneys, at least one of the  
20 matters with the attorneys with the special litigation  
21 committee. I am not aware of anyone else that staffs  
22 the -- I know Andrew Arulanandam in our -- head of our  
23 public affairs, works with the special litigation  
24 committee in terms of some communication matters.  
25 Q. (BY MR. SHEEHAN) In general, the corporate  
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1 secretary is responsible for maintaining the books and  
2 records of the corporation with respect to minutes.  
3 Correct?  
4 A. That would be correct.  
5 Q. But in this case, he was recused from the  
6 special litigation committee activities by the  
7 resolution of the board of directors. Correct?  
8 MR. GARMAN: Objection to the form of the  
9 question.  
10 A. Well, by -- by himself, who -- because of the  
11 legal situation, took him out of -- he took himself out  
12 of issues involving the special litigation committee.  
13 Q. (BY MR. SHEEHAN) So was there somebody else  
14 in the -- in the corporate secretary or corporate  
15 counsel's office who had the responsibility of  
16 determining what minutes should be kept and where they  
17 would be kept?  
18 MR. GARMAN: Objection to the form.  
19 Go ahead and answer.  
20 A. I don't know the answer to that. You would  
21 need to ask the special litigation committee if they  
22 worked with anyone on minutes. I simply don't know the  
23 answer.  
24 Q. (BY MR. SHEEHAN) Okay.  
25 MR. SHEEHAN: Could we go to the next  
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1 exhibit, please, Jonathan?  
2 (Exhibit 10 marked.)  
3 Q. (BY MR. SHEEHAN) Okay. I show you  
4 Exhibit 10, Mr. LaPierre. Have you ever seen Exhibit 10  
5 before?  
6 MR. GARMAN: Hold on. It hadn't shown up  
7 until we hit refresh.  
8 Okay. We have Exhibit 10.  
9 Q. (BY MR. SHEEHAN) Do you recognize -- I'm  
10 sorry.  
11 MR. GARMAN: He's reviewing it.  
12 Go ahead.  
13 MR. SHEEHAN: Okay.  
14 A. Yes, I recognize that.  
15 Q. (BY MR. SHEEHAN) Okay. What is that ship?  
16 A. That is a boat owned by -- I believe it's  
17 owned by the McKenzies.  
18 Q. That is the Stanton McKenzies?  
19 A. Yes, that would be correct.  
20 Q. And the description here says it has a full  
21 staff and crew at your disposal. When you used this  
22 ship, did you have a full staff and crew at your  
23 disposal?  
24 MR. GARMAN: Objection to form.  
25 Go ahead.  
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1 A. There were -- as we've discussed before, there  
2 were, I think, two or three or four staff people there,  
3 and there was -- and there was a cook.  
4 Q. (BY MR. SHEEHAN) And was the boat when you  
5 received -- the ship when you received use of it, was it  
6 fully stocked with fuel and food?  
7 MR. CORRELL: This is Kent Correll.  
8 Objection to the form.  
9 A. Yes, I believe it had fuel on it and I believe  
10 it had food.  
11 Q. (BY MR. SHEEHAN) And did it come with four en  
12 suite staterooms?  
13 A. It did come with several staterooms.  
14 Q. And did it come with a hydraulic  
15 state-of-the-art swim platform?  
16 A. I'm not sure exactly what a state-of-the-art  
17 hydraulic swim platform is, but it -- it may have,  
18 depending on what that term means.  
19 Q. Okay. Did it come with a 16-foot jet boat?  
20 A. Occasionally there was a -- was a jet boat  
21 there.  
22 Q. Did you have use of the jet boat?  
23 A. Occasionally, yes.  
24 Q. Did it come with two Sea-Doo WaveRunners?  
25 A. Yes, there were two WaveRunners on that boat.  
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1 Q. Okay. The -- before accepting the use of this  
2 boat for a week at a time, did you advise Mr. Frazer  
3 that you intended to do so?  
4 A. I don't think I did. I did not -- as I said,  
5 at this point I was under all kinds of threats. I did  
6 not feel safe anywhere with myself or my family. I  
7 was -- this was offered as a security retreat where we  
8 could be safe and feel safe, and I could get Susan and  
9 Colleen, who works for WLF, together and do some work  
10 and do some other work, and I used it as a security  
11 retreat.  
12 Q. Did you offer to the Stanton McKenzies to pay  
13 for the use of the ship?  
14 A. No, I did not. They -- they simply let me use  
15 it as a security retreat because they knew the threat  
16 that I was under. And I was basically under  
17 presidential threat without presidential security in  
18 terms of the number of threats I was getting. And all  
19 of us were struggling with how to deal with that type  
20 situation with a private citizen with the amount of  
21 threat that we were having. And this was the one -- one  
22 place that I hope could feel safe, where I remember  
23 getting there going, Thank God I'm safe, nobody can get  
24 me here. And that's how it happened. That's why I used  
25 it.  
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1 Q. Did the Stanton McKenzies or other companies  
2 charge the NRA for use of the yacht?  
3 A. No, they did not.  
4 Q. All right. Did you consider whether  
5 acceptance of the use of this ship Illusions was a  
6 potential violation of the conflict of interest policy  
7 with the NRA?  
8 MR. CORRELL: This is Kent Correll.  
9 Objection to the form.  
10 A. I actually thought that given the security  
11 threat that I was under and the fact that NRA was -- was  
12 at almost a loss as to how to protect somebody with the  
13 amount of threat that I was having, that -- that my work  
14 and the threat that came with it, this was -- was a  
15 place that I could go and be safe, and it was related to  
16 that that I -- that I -- that I did it.  
17 Q. (BY MR. SHEEHAN) Did you consider whether  
18 acceptance of the use of this yacht Illusions by  
19 yourself and your family was a potential violation of  
20 the conflict of interest policies of the NRA?  
21 MR. GARMAN: Objection to the form of the  
22 question.  
23 MR. CORRELL: This is Kent Correll.  
24 Objection to the form.  
25 MR. GARMAN: Go ahead.

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1 A. Because of the threat that I was under and  
2 because of the fact that I couldn't feel safe anywhere,  
3 was being harassed and screamed at everywhere and death  
4 threats, I -- I considered it a condition of the  
5 security environment that I was operating in as a result  
6 of the job that I had with the NRA, which put me in a  
7 totally unique situation that I don't think hardly any  
8 other American has experienced, with the possible  
9 exception of someone like -- I mean, I can't describe  
10 the extent of the threat that I was under at that point.  
11 Q. (BY MR. SHEEHAN) Did you --  
12 A. And --  
13 Q. I'm sorry.  
14 A. -- there were also some stand-ups for that  
15 H2Ostream video website. But the real -- but the major  
16 reason I did this was a security retreat at a time when  
17 I could not find a safe place to go at all.  
18 Q. Would you agree with me that the value of a  
19 108-foot yacht with a full crew, full of supplies and  
20 fuel exceeds \$300?  
21 MR. GARMAN: Objection to form.  
22 Go ahead.  
23 A. I think -- I think, yes, it probably would,  
24 but it was also involved with my job and the threat that  
25 I was under and a place to be safe and -- and in a

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1 totally unique situation that I think hardly anybody  
2 else in the US experienced that type of threat, other  
3 than maybe the president. I mean, I had presidential  
4 threat without presidential security and was looking for  
5 a place to be safe.  
6 Q. (BY MR. SHEEHAN) When did Mr. Frazer first  
7 learn that you had received the use of the yacht  
8 Illusions from the McKenzie Stantons?  
9 MR. GARMAN: Objection to the form of the  
10 question.  
11 A. I -- I don't know. I mean, I -- I -- I wasn't  
12 trying to hide it, but I wasn't trying to publicize it  
13 either because it was a security issue.  
14 Q. (BY MR. SHEEHAN) With respect to Mr. Frazer,  
15 it was a security issue?  
16 MR. GARMAN: Objection to the form of the  
17 question.  
18 A. No, the use of it was a security issue.  
19 Q. (BY MR. SHEEHAN) Okay. Did you -- did you  
20 security director, the NRA security director approve  
21 your acceptance of the use of the yacht Illusions for a  
22 week?  
23 MR. GARMAN: Objection to the form of the  
24 question.  
25 A. At that time the security director I think was

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1 just telling me to get out of town, and I -- I -- you  
2 know, I found a way. I was struggling and I found a way  
3 to be safe and --  
4 Q. (BY MR. SHEEHAN) Did you --  
5 A. -- this is something that was part of the  
6 self-correction that we have done at the NRA since, you  
7 know, 2017, 2018. It has not happened in 2019, 2020,  
8 and it's one of the things that -- that we have  
9 self-corrected on where I -- I am not using that -- that  
10 boat anymore.  
11 Q. Okay. What was your last stay on Illusions?  
12 A. I think it was sometime in 2018 after the  
13 Parkland shooting in the summer.  
14 Q. When was your first stay on the yacht  
15 Illusions?  
16 A. I think it was after the Sandy Hook shooting,  
17 the summer after the Sandy Hook shooting.  
18 Q. How many times did you go on the yacht  
19 Illusions in The Bahamas?  
20 A. I probably went once -- one time a year where  
21 we could go and be safe for the -- from the Sandy Hook  
22 shooting up until 2019. And I did not do it in 2019.  
23 As part of the self-correction, that's one of the things  
24 that -- that came to my attention in terms of -- I told  
25 you we looked at everybody, including me, and that I

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1 have self-corrected on.  
2 Q. Did you sail on the yacht Illusions to  
3 anyplace other than The Bahamas?  
4 MR. GARMAN: Objection to form.  
5 A. No, The Bahamas.  
6 Q. (BY MR. SHEEHAN) Did you sail on any other --  
7 or did you travel on any other yachts owned by the  
8 McKenzies, the Stanton McKenzies during the time you've  
9 been NRA president and executive VP?  
10 A. Yes, only with -- only in relation to work and  
11 in relation to celebrities.  
12 Q. And so --  
13 A. As I -- as I testified before, I would try to  
14 recruit celebrities to the NRA. Associated Television  
15 was one of our access points into celebrities, young and  
16 old. They worked with a lot of the former Disney stars,  
17 young people, and also people like -- well, I don't know  
18 whether I should say their names. A lot of other  
19 celebrities. And those other trips I did with  
20 celebrities.  
21 Q. What other trips -- how many other trips did  
22 you take on boats owned by the Stanton McKenzies besides  
23 the yacht Illusions?  
24 MR. GARMAN: Objection to form.  
25 Go ahead.

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1 A. Maybe -- maybe three or -- three or four with  
2 celebrities.  
3 Q. (BY MR. SHEEHAN) Where were those trips  
4 located?  
5 A. Most of them were in -- in Europe, and I think  
6 one of them was to Greece.  
7 Q. Did you sign off --  
8 A. With --  
9 Q. I'm sorry, Mr. LaPierre. I interrupted you.  
10 A. With celebrities.  
11 Q. And did you sign off on contracts with  
12 companies owned by the Stanton McKenzies after you went  
13 on your fist trip on the Illusions?  
14 MR. GARMAN: Objection to form.  
15 A. I wasn't involved in negotiating the  
16 contracts. I stayed out of all that. I did sign some  
17 of the extensions of the -- the contracts.  
18 Q. (BY MR. SHEEHAN) Did you consult with  
19 Mr. Frazer, as the head of -- the head of conflicts of  
20 interest, to determine whether you could, in fact, sign  
21 those contracts or extensions after you had gone on the  
22 yacht Illusions?  
23 MR. CORRELL: This is Kent Correll.  
24 Objection to form.  
25 A. I did not because I considered the ones with

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1 celebrities completely work. And I considered this one  
2 was a security issue with my family, with myself, and I  
3 did not see that as a -- in all honesty, as a conflict  
4 back then. I -- with the safety and the threat issues I  
5 was facing with the need to recruit celebrities, I --  
6 and the fact that the NRA wasn't charged for it, I just  
7 didn't see it an issue.  
8 Now with what we've gone through with the  
9 2018, 2019, 2020 with the compliance grids and  
10 everything else, this is one of the things that -- one  
11 of the precautions I took that I -- in terms of my  
12 safety that I would not do, given the self-correction  
13 that we've done.  
14 MR. SHEEHAN: Okay. At this point, let's  
15 take a five-minute break.  
16 MR. GARMAN: Okay.  
17 THE VIDEOGRAPHER: We're going off the  
18 record. The time on the video is 10:17 a.m.  
19 (Break from 10:17 a.m. to 10:32 a.m.)  
20 THE VIDEOGRAPHER: We're back on the  
21 record. The time on the video is 10:32 a.m.  
22 Q. (BY MR. SHEEHAN) Good morning again,  
23 Mr. LaPierre.  
24 A. Good morning.  
25 Q. Let's go back for a second to Mr. Staples.

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1 When you went to The Bahamas, did he do any  
2 review of the safety or security of the yacht Illusions  
3 before you used it for the first time?  
4 A. I don't think he did.  
5 Q. Did he do any security check on the employees  
6 who were on the yacht Illusions before you went on it  
7 the first time?  
8 A. I don't believe he did.  
9 Q. Did he thereafter, in any of your following  
10 trips to the yacht Illusions, do any background checks  
11 on any of the people who would be on the boat with you?  
12 A. I don't -- I don't think he did.  
13 Q. When you talked about meeting celebrities at  
14 the Super Bowl or Eleuthera or Europe, did Mr. Staples  
15 or staff or a contractor do any background checks on any  
16 of those celebrities that you met with to make sure that  
17 they were not someone who would pose a threat to you?  
18 A. No, he didn't, but they were -- I mean, as I  
19 said, part of my job -- my job has many facets. I have  
20 to raise \$300 million to \$400 million a year for this  
21 association. I am the out-facing brand of the  
22 association, doing all the television appearances. I am  
23 doing -- putting the networks together to reach all the  
24 cultural touchpoints, whether it be the NFL, whether it  
25 be NASCAR, whether it be celebrities that influence

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1 American society, to keep NRA in the mainstream.  
2 I am also working on raising all the money,  
3 working on direct mail and working on all of that, as  
4 well as, you know, working with the day-to-day  
5 management of the association in terms of -- I mean, I  
6 do everything I can to put -- build this association and  
7 to do what's in the best interest of this association in  
8 terms of making it strong and servicing our 5 million  
9 members that -- that we work for.  
10 And I mean, with those responsibilities  
11 that I've had to undertake, there has come a lot of  
12 tremendous burdens that I've had to deal with, and I've  
13 dealt with them. And I haven't whined about them, but  
14 they've been extraordinary and unique, and I have done  
15 the best job I could wrestling with it all.  
16 And I think I -- I'm very proud of the work  
17 I've done with the NRA. I think our members are.  
18 That's why we're still at 5 million members, and that's  
19 why we're -- we're strong financially. And it's why the  
20 NRA has been able to win consistently from a legislative  
21 standpoint for the last couple of decades, is what --  
22 it's all a mosaic and I am the glue that kind of tries  
23 to hold that -- and piece that whole mosaic together.  
24 Q. If I could, Mr. LaPierre, my question was does  
25 Mr. Staples do any background check on the celebrities  
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1 that you meet with?  
2 A. No. I mean, I don't -- I don't -- I don't  
3 tell him I'm going to meet with this certain celebrity  
4 and he needs to do a background check on the celebrity.  
5 Q. Okay. With respect to the Brewer firm, has  
6 the NRA delegated decision-making authority to the  
7 Brewer firm on expenditure of funds by the NRA?  
8 MR. GARMAN: Objection to form.  
9 A. The -- the NRA has put aside money in a trust  
10 to be used by the Brewer firm. I believe that, as I  
11 said, that the terms are an accounting will be provided  
12 to the -- to the -- I think that accounting is provided  
13 to the SLC, and I think it's also to be provided to me  
14 as the -- to my office as to -- as to how those -- as to  
15 how those funds are spent.  
16 Q. (BY MR. SHEEHAN) And did you tell -- has that  
17 accounting been provided yet with respect to the  
18 \$5 million fund?  
19 A. I think the accounting has been provided in a  
20 couple of instances. They've used money to explore  
21 alternatives, reorganization alternatives.  
22 Q. Apart from financial decisions, are there any  
23 other decisions of the NRA that the NRA has delegated to  
24 the Brewer firm to make on behalf of the NRA?  
25 MR. GARMAN: Objection to the form of the  
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1 question.  
2 A. Well, the Brewer firm has been retained to  
3 handle litigation matters under the management now of  
4 the SLC, so they -- they -- they make litigation matter  
5 suggestions.  
6 Q. (BY MR. SHEEHAN) I'm sorry. They make  
7 litigation matter suggestions. And who has the ultimate  
8 decision-making on those suggestions?  
9 A. They discuss them with the -- with the SLC.  
10 Q. Apart from litigation decisions and financial  
11 decisions, are there any areas where the NRA has  
12 delegated to the Brewer firm decision-making authority?  
13 MR. GARMAN: Objection to form.  
14 A. Not that I know of. I mean, they are involved  
15 in all litigation matters. They have been involved  
16 also -- but the litigation matters with New York state  
17 cover a broad scope in terms of what we've had to deal  
18 with since the -- I'm not trying to pin you personally,  
19 Mr. Sheehan, but in terms of what we've had to deal with  
20 from the Department of Financial Services and the  
21 governor and the attorney general and -- and her  
22 matters, it's a broad scope.  
23 It also involved running down any  
24 whistleblower complaints that could be an issue in this  
25 litigation, to make sure that they were fully protected  
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1 and fully checked out and fully investigated; and if  
2 there was anything there, to get to the bottom of it.  
3 I mean, the Brewer firm has been retained to  
4 work litigation issues, but part of the litigation also  
5 involves bringing the NRA into 100 percent  
6 self-correction and compliance, every employee,  
7 including myself, and every vendor with New York state  
8 not-for-profit law and every other not-for-profit law.  
9 And we've done, as I said, a massive amount of  
10 work for that that's continuing in 2018, 2019 and 2020  
11 and 2021, which we are very proud of. And we have  
12 learned a lot, and we have adjusted, and we now operate  
13 under a completely different compliance grid. There are  
14 checks in place to make sure no one can override those  
15 compliance controls, and -- and we're very proud of the  
16 work that's been done.  
17 Q. (BY MR. SHEEHAN) So --  
18 A. I don't understand why there is such a lack of  
19 recognition of that out of the New York AG's Office in  
20 terms of all the good work that's been done here to --  
21 to put the organization into complete self-compliance.  
22 And this started long before the attorney general's  
23 investigation even started.  
24 Q. Does the Carry Guard program still exist?  
25 A. It does not. It -- we are still providing  
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1 personal protection insurance with Lockton. It is not  
2 called Carry Guard. As a result of what we believe was  
3 an unfair targeting by the Department of Financial  
4 Services as part of this plan to weaponize the  
5 government of New York state, Maria Vullo, and her  
6 Department of Financial Services put out notices to  
7 banks and insurance companies and others that it was a  
8 risk factor doing business with the NRA and not wise  
9 and then, from what we understand, had back channel  
10 communication and -- which we believe was clearly a  
11 viewpoint discrimination. It was clearly a violation of  
12 this organization's constitutional rights, and we have  
13 filed First Amendment cases against both the New York  
14 Department of Financial Services and the New York  
15 Attorney General with the support of the American Civil  
16 Liberties Union, who agrees with us that what is going  
17 on is not proper under the Constitution of the United  
18 States.  
19 And so I mean, we're -- as I said, when I  
20 started down this path in 2017, I wasn't a lawyer, I'm  
21 not a CPA, I'm not an accountant. But when Attorney  
22 General Schneiderman told us that, I was determined to  
23 do whatever this organization needed to do to take a  
24 look at everything, every employee. If we needed to  
25 self-correct, self-correct. If -- as you heard me say  
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1 before, if I lost every friend I ever made, that's the  
2 path we were going down because it was the right course  
3 for the organization.  
4 Q. So let me ask you, Mr. LaPierre. Did you know  
5 that Michael Marcellin had a contract with the Lockton  
6 Affinity people at the time that he was managing some  
7 relationships with Lockton Affinity at the NRA?  
8 A. I did not. I knew nothing about that.  
9 Q. His -- did he get a consulting contract when  
10 he left the NRA?  
11 MR. GARMAN: Objection to form.  
12 Go ahead.  
13 A. I knew nothing about that. I now believe,  
14 based on information that's come to light, he did, but I  
15 knew nothing about it at all.  
16 Q. (BY MR. SHEEHAN) So you knew nothing about  
17 the -- his contract with Lockton Affinity. Correct?  
18 A. I knew nothing about his contract with Lockton  
19 Affinity.  
20 Q. Did you know anything about his contract at  
21 the end of his employment for consulting services?  
22 A. I did not.  
23 Q. Okay. With respect to the meeting that was  
24 scheduled for March 14th, did you travel to Dallas to go  
25 to that meeting?  
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1 A. March 14th?  
2 MR. GARMAN: Objection to form.  
3 Go ahead.  
4 Q. (BY MR. SHEEHAN) The meeting was not actually  
5 held, but it was scheduled for March 14th. Did you  
6 travel to Dallas for the March 14th meeting?  
7 A. The one that was canceled, no, I did not.  
8 Q. Okay. Are you traveling to Dallas for the  
9 meeting on Sunday, the 28th?  
10 A. I will be.  
11 Q. Okay. And who -- how are you going to get to  
12 Dallas?  
13 A. The security is setting up private  
14 transportation, and I will take -- take probably a board  
15 member and some staff people with me.  
16 Q. Okay. Is there an agenda for the March 28  
17 meeting?  
18 A. I have not seen an agenda. I know the notice  
19 talked about a -- that went out publicly talked about a  
20 legal briefing, and I haven't seen an agenda beyond  
21 that.  
22 Q. Is it customary to get agendas in advance for  
23 the board meetings at the NRA?  
24 A. For a regular full board meeting, there are  
25 agendas in advance that are given out, that's correct.  
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1 Q. Do you know if there's been a board book  
2 distributed with respect to the March 28 meeting?  
3 A. I do not.  
4 Q. Who's responsible for preparing board books or  
5 board materials for board meetings at the NRA?  
6 A. The secretary, Mr. Frazer.  
7 Q. Okay. And to the best of your knowledge, he's  
8 not prepared a board book for the March 28 meeting?  
9 MR. GARMAN: Objection to form.  
10 Go ahead.  
11 A. I haven't seen it if he has.  
12 Q. (BY MR. SHEEHAN) Okay. Do you plan to ask  
13 the board to ratify the filing of this bankruptcy case?  
14 MR. GARMAN: Objection to the form of the  
15 question.  
16 I instruct you not to answer to the extent  
17 that invades the attorney/client privilege and/or  
18 strategy.  
19 A. I'm not -- I'm not sure what the strategy is  
20 in terms of the board and what they plan to do on that.  
21 Q. (BY MR. SHEEHAN) Have you discussed with  
22 anyone else in the -- on the board or the special  
23 litigation committee whether the meeting will discuss  
24 the issue of ratification of the bankruptcy filing?  
25 MR. GARMAN: Objection. I object to the  
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1 question.  
2 I instruct you not to answer. That invades  
3 the attorney/client privilege.  
4 THE WITNESS: Okay.  
5 Q. (BY MR. SHEEHAN) Okay. I am not asking you  
6 about Mr. Brewer. I am asking you about the three  
7 members of the special litigation committee.  
8 MR. GARMAN: I understand.  
9 Q. (BY MR. SHEEHAN) Have you discussed -- have  
10 you had discussions with members -- I'm sorry.  
11 MR. GARMAN: I'm sorry, Counsel. Go  
12 ahead. I was apologizing for interrupting you.  
13 MR. SHEEHAN: Okay. Okay.  
14 Q. (BY MR. SHEEHAN) Have you discussed with  
15 members of the special litigation committee whether the  
16 subject of ratification should be discussed at the March  
17 28 meeting?  
18 MR. GARMAN: I instruct you not to answer  
19 to the extent those communications included your legal  
20 counsel.  
21 MR. CORRELL: This is Kent Correll. I'm  
22 also -- I object to the form of the question --  
23 (Reporter clarification.)  
24 MR. CORRELL: This is Kent Correll. I  
25 object to the form of the question, and I instruct the  
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1 witness not to answer the question to the extent that it  
2 would require him to divulge conversations he had with  
3 members of the SLC about litigation.  
4 A. I had -- the conversations with the SLC were  
5 all conversations with attorneys that were -- I believe  
6 the counsel is advising me not to talk about.  
7 I had one conversation with Sandy Froman  
8 where -- where we talked about it, and I told her I  
9 wasn't sure whether they were or were not going to ask  
10 specifically for a ratification of what -- of what -- of  
11 the bankruptcy. And we talked about the board in  
12 general. And we talked about the fact that they should  
13 be able to ask all kinds of questions and they should be  
14 able to be fully filled in on everything. And it should  
15 be a very open dialogue in terms of everyone and because  
16 everything needed to get out in the open.  
17 Q. (BY MR. SHEEHAN) Is the March 28 meeting, is  
18 that in Dallas?  
19 A. Yes, it is.  
20 Q. And is it in person?  
21 A. It is.  
22 Q. Will people be allowed to join electronically?  
23 A. I do not believe they will be.  
24 Q. Do you know how many directors are confirmed  
25 to attend on March 28 meeting?  
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1 A. You know, I don't. I have not asked John  
2 that. I know at the last one that we did and ended up  
3 being canceled, there were 47 that were planning on  
4 attending. I don't know what the number that he has on  
5 this one. I have not had a chance to talk with him.  
6 Q. Are all the directors flying by coach class to  
7 Dallas?  
8 MR. GARMAN: Objection to the form of the  
9 question.  
10 A. As far as I know, they are.  
11 Q. (BY MR. SHEEHAN) Have you authorized any  
12 board member to fly other than by coach class?  
13 A. I have not.  
14 Q. And was there a board member flying down with  
15 you on your private charter to the meeting on the 28th?  
16 A. I intended to. Given the fact the plane was  
17 going down there, I intended to offer Willes Lee, who  
18 lives in this area, a chance to ride down and one or two  
19 staff people that -- given the fact the plane is going  
20 there anyway, an opportunity to go down that way.  
21 Q. During --  
22 A. And --  
23 Q. I'm sorry.  
24 A. And I also intended -- intend to check with  
25 counsel to see whether that's appropriate before I --  
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1 before I do that.  
2 Q. During the year of -- between March 15th of  
3 2020 and today, how frequently do you go into the office  
4 at the NRA?  
5 A. I've been here quite a bit.  
6 Q. Twice a week, three times a week?  
7 A. A couple days a week. Again, a couple days a  
8 week.  
9 Q. Okay.  
10 A. And then I've been working from home a couple  
11 days a week --  
12 Q. Do you --  
13 (Reporter clarification.)  
14 A. -- about COVID and -- over the COVID exposure.  
15 Q. (BY MR. SHEEHAN) Do you know why the decision  
16 was made not to allow attendance electronically at the  
17 Dallas meeting on the 28th?  
18 MR. GARMAN: Objection to the form of the  
19 question.  
20 A. I don't, but I believe it was in relation to  
21 security concerns of somehow if they -- if they used  
22 Zoom or something like that of security -- security  
23 issues, although I'm not positive of that.  
24 Q. (BY MR. SHEEHAN) Okay.  
25 MR. SHEEHAN: At this point I think I'm  
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1 finished. I just want to go off the record and talk to  
2 my colleagues for a few minutes, but I think that the  
3 individual portion of Mr. LaPierre's deposition will be  
4 completed at that point.  
5 So let's take five minutes and then come back,  
6 and then I may have one or two more questions.  
7 MR. MASON: Just to clarify, the NY AG's  
8 portion of the individual?  
9 MR. SHEEHAN: Correct. Correct.  
10 THE VIDEOGRAPHER: We're off the record.  
11 The time on the video is 10:52 a.m.  
12 (Break from 10:52 a.m. to 11:01 a.m.)  
13 THE VIDEOGRAPHER: We're back on the  
14 record. The time on the video is 11:01 a.m.  
15 Q. (BY MR. SHEEHAN) So Mr. LaPierre, I just have  
16 one more question and then turn it over to Mr. Mason.  
17 If something were to happen to you, is there  
18 anyone at the NRA that's in position to succeed you as  
19 executive VP and has the training and experience?  
20 MR. GARMAN: Objection to the form of the  
21 question.  
22 A. I think that that is -- that that is one of  
23 the -- I have a concern and I know the board of  
24 directors has a concern of the fact that -- the fact  
25 that I have been for 40 years the voice of our members  
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1 out there on television, in terms of, you know, being  
2 their voice and fighting their fight and standing up for  
3 their freedoms. My fundraising signature and  
4 fundraising ability helps the organization. And I --  
5 the fact that I've been out there with the members for  
6 40 years that are the ultimate -- what makes this  
7 association work, I think I have a unique relationship  
8 with the membership in terms of -- and I think -- I  
9 think one of the concerns that we're all wrestling with  
10 is how that succession will take place when it takes  
11 place and how it will affect the monetary situation of  
12 the NRA.  
13 Q. (BY MR. SHEEHAN) So is there any person in  
14 your view who is currently in a position to take over  
15 your position if you left?  
16 MR. GARMAN: Objection to the form of the  
17 question.  
18 Go ahead and answer.  
19 A. I -- there are a lot -- there are some smart  
20 young people around here. I think they are growing, and  
21 I have confidence that they have the potential of  
22 growing into the job.  
23 Q. (BY MR. SHEEHAN) Who are they?  
24 A. Well, I don't have a specific successor picked  
25 yet. I'm not so sure it -- I'm not so sure it's -- and  
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1 it's not even my decision; it's the board of directors'  
2 decision. And I think whatever would happen, the board  
3 of directors would be the one that would make the  
4 decision after doing a search, and it would be their  
5 decision, not mine. So I don't know that I should even  
6 speculate, given the fact that that is entirely a  
7 decision to be made not by me, who works for the board,  
8 but by the board of directors. I mean, that's how I was  
9 chosen, and that's how I've been reelected every year by  
10 the board, and the board will make that decision. So I  
11 would hesitate to even throw out names, given the fact  
12 that ultimately it's not my decision.  
13 Q. But do you have an opinion about the young  
14 people you mentioned before who could step into that  
15 role? That is, who they might be?  
16 MR. GARMAN: Objection to the form of the  
17 question. I think he said no one was ready.  
18 A. There's a lot of good people in this  
19 organization that I'm sure the board would look at. I  
20 mean, I could -- I could throw out names like -- but  
21 it's not my decision. I mean, I'm sure they would look  
22 at Doug Hamlin. I'm sure they would look at Jason  
23 Ouimet. I'm sure they would look at Mr. Schropp. I'm  
24 sure they would look at, you know, Mr. DeBergalis. I'm  
25 sure they would look at -- but they would also look  
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1 probably at other candidates, and it's ultimately their  
2 decision.  
3 I just know that -- I think we have a really  
4 good staff here right now, and they're doing really good  
5 work, and I respect them all. And I wouldn't want to --  
6 I wouldn't want to really at this point -- it's not my  
7 decision. It's the board's decision. I mean, I -- I  
8 don't know how to say it beyond that. It is entirely  
9 the board of directors' decision as to who they pick to  
10 succeed me should I choose to retire.  
11 Q. (BY MR. SHEEHAN) Have you had discussions  
12 with the board about a succession plan?  
13 MR. GARMAN: Objection to the form of the  
14 question.  
15 Go ahead.  
16 A. I know the board is -- talks about that. I  
17 know the officers talk about that. I know they talk  
18 also about the fundraising issues that -- that will  
19 exist, based on the amount of money that -- I mean, a  
20 lot of years -- I mean, because NRA's money comes in  
21 based on whether you're out there fighting on TV and  
22 whether you're out there fighting the cause and whether  
23 you're out there battling.  
24 And then, you know, we also have all these  
25 great programs, whether they're -- I talked about them,  
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1 the 130,000 safety instructors, 14,000 law enforcement  
 2 instructors, the child safety programs, the great  
 3 magazines we publish. I mean, all the work the NRA does  
 4 on a day-to-day basis that's not legislative or  
 5 political.  
 6 And it -- it is a -- and ultimately, the 5  
 7 million members that elect the board of directors, a  
 8 third of them each year, control the organization. And  
 9 it's a very robust process, and I'm sure that the  
 10 successor -- you know, the board will look at all of  
 11 those factors when they make the decision.  
 12 MR. SHEEHAN: All right. At this point I  
 13 will turn it over to Mr. Mason on behalf of Ackerman  
 14 McQueen for questioning.  
 15 EXAMINATION  
 16 BY MR. MASON:  
 17 Q. Good morning, Mr. LaPierre. Are you ready --  
 18 A. Good morning.  
 19 Q. -- to proceed?  
 20 A. Yes. Good morning.  
 21 Q. My name is Brian Mason. I'm a partner at  
 22 Dorsey & Whitney in Dallas, and I represent Ackerman  
 23 McQueen. Do you understand who I am and who I  
 24 represent?  
 25 A. I do.

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1 Q. I want to ask you a few follow-up questions  
 2 from earlier this morning.  
 3 With respect to the money that you were  
 4 testifying about that was set aside in the Brewer trust  
 5 account, was that in reference to the \$5 million?  
 6 MR. GARMAN: Objection to the form of the  
 7 question.  
 8 Go ahead if you understand.  
 9 A. Yes, it was \$5 million that was put in the  
 10 Brewer trust account to be used on reorganization  
 11 matters with -- yes.  
 12 MR. CORRELL: This is Kent Correll.  
 13 Mr. Mason, with Mr. Sheehan we had an agreement that any  
 14 objection made by the NRA would be joined by  
 15 Mr. LaPierre individually. Can we have that same  
 16 agreement?  
 17 MR. MASON: Yes, we can.  
 18 MR. CORRELL: Thank you.  
 19 Q. (BY MR. MASON) You also testified that the  
 20 Brewer firm was handling the litigation matters under  
 21 the management of the special litigation committee. Did  
 22 I understand that correctly?  
 23 A. That is correct. Because I was individually  
 24 named by the New York AG's Office and John Frazer was  
 25 individually named, I cannot be involved in the

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1 management of that litigation in any way and am  
 2 completely out of the process. It's being managed by  
 3 the special litigation committee.  
 4 Q. So does that include all litigation, including  
 5 the Ackerman McQueen litigation?  
 6 A. The special litigation committee is managing  
 7 all that litigation, because I think the belief is it's  
 8 all directly related to the New York state issues.  
 9 Q. Is the special litigation committee managing  
 10 the litigation with Under Wild Skies?  
 11 A. The special litigation committee is -- is  
 12 managing that legislation.  
 13 Q. Is the special litigation committee managing  
 14 the litigation that the NRA has against Mark Dycio?  
 15 A. The special litigation committee is managing  
 16 that litigation also.  
 17 Q. So all of the current litigation that the NRA  
 18 has is being managed by the special litigation  
 19 committee. Do I understand that correctly?  
 20 A. That's -- that's my understanding.  
 21 Q. And Mr. Frazer has recused himself from  
 22 involvement with the special litigation committee  
 23 because of the New York AG action?  
 24 MR. GARMAN: Objection to the form of the  
 25 question.

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1 A. He has.  
 2 Q. (BY MR. MASON) And you have also --  
 3 A. I'm not -- I'm saying to the best of my  
 4 knowledge on this. I mean, I'm not an expert on --  
 5 you'd have to ask John Frazer whether he's involved in  
 6 any of this legislation that in some way they may  
 7 consider different than the New York legislation.  
 8 Q. But as you sit here right now, your  
 9 understanding is --  
 10 MR. CORRELL: Excuse me, Mr. Mason. This  
 11 is Kent Correll. I just want to note that Mr. LaPierre  
 12 has twice used the word "legislation" rather than  
 13 "litigation."  
 14 THE WITNESS: Yes. I meant "litigation."  
 15 MR. CORRELL: Thank you.  
 16 Q. (BY MR. MASON) But as you sit here right now,  
 17 Mr. LaPierre, it's your understanding that all of the  
 18 litigation that the Brewer law firm is handling is being  
 19 managed by the special litigation committee?  
 20 MR. GARMAN: Objection to the form of the  
 21 question.  
 22 A. I believe -- I believe it is.  
 23 Q. (BY MR. MASON) You also said that the Brewer  
 24 firm was responsible for running down any whistleblower  
 25 complaints. Do you recall that?

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1 A. I did, because they all related to the -- the  
2 New York -- the New York AG litigation.  
3 Q. Has the NRA had any whistleblower complaints  
4 that the Brewer law firm was not involved with in the  
5 last -- in the last two years?  
6 MR. GARMAN: Objection to the form of the  
7 question.  
8 Go ahead and answer.  
9 A. I think in the last two years, the -- when the  
10 whistleblower complaints started to come forward, the  
11 Brewer firm was -- was charged with running down those  
12 internal whistleblower complaints and then checking them  
13 out, making sure the whistleblower was protected, and  
14 seeing whether there was truth or not truth and, if  
15 there was truth, getting to the bottom of it and dealing  
16 with it appropriately.  
17 Q. (BY MR. MASON) And was that done at your  
18 direction?  
19 A. Absolutely. I wanted -- I mean, going back  
20 to 2017 after the call from Attorney General  
21 Schneiderman --  
22 Q. Mr. LaPierre, my question was much simpler.  
23 It was just was that done at your direction?  
24 A. Yes. I -- one of the things that we were  
25 involved with, this New York litigation, the potential  
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1 of it.  
2 We were already involved with the Department  
3 of Financial Services, which was the first part of it.  
4 Whistleblower complaints started to come  
5 forward that we believed would directly relate to the  
6 litigation involving New York, and one of the things  
7 that we asked Mr. Brewer to do was to -- the Brewer firm  
8 to do was to run down these whistleblower complaints and  
9 check them out and get to the bottom of it and protect  
10 the whistleblower and do everything appropriate that  
11 should be done in that type situation.  
12 Q. Okay. Yesterday morning you were asked  
13 whether you had reviewed any documents prior to your  
14 deposition yesterday, and you indicated that you had  
15 not.  
16 Did you review any documents in preparation  
17 for your deposition today, between yesterday evening and  
18 this morning?  
19 A. I did not.  
20 Q. As executive vice president, do you report to  
21 the NRA board of directors?  
22 A. I work for the NRA board of directors.  
23 They -- they can hire me. They can fire me. They -- I  
24 work completely for the board of directors. I am  
25 their -- their employee.  
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1 Q. And that includes the entire board, not just a  
2 portion of the board. Correct?  
3 MR. GARMAN: Objection to the form of the  
4 question.  
5 But go ahead.  
6 A. It includes the -- it includes the whole of  
7 the board of directors as a -- as a body. Not an  
8 individual board member, but the -- the -- the board of  
9 directors in its entirety and in terms of -- in other  
10 words, while I do everything I can to work with  
11 individual board members, I actually work for the board  
12 as a whole. The power rests in the board as a whole and  
13 their votes and their consensus as a majority of the  
14 board of directors.  
15 Q. (BY MR. MASON) And you've previously  
16 testified that the ultimate authority for the governance  
17 of the NRA rests with the entire board. Right?  
18 MR. GARMAN: Objection to the form.  
19 Go ahead.  
20 A. It absolutely does.  
21 Q. (BY MR. MASON) Do you believe it's important  
22 to be open and transparent with the board?  
23 MR. GARMAN: Objection to form.  
24 A. I believe I've always believed it's very  
25 important to be open and transparent with the board.  
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1 Q. (BY MR. MASON) Do you believe it's important  
2 to be honest with the board?  
3 MR. GARMAN: Objection, form.  
4 A. I've always believed it's important to be  
5 honest with the board.  
6 Q. (BY MR. MASON) Do you trust the NRA board to  
7 oversee the NRA?  
8 A. I do trust the NRA board to oversee the NRA.  
9 That's why I've always said it's very important that NRA  
10 do everything it can to get very distinguished and  
11 accomplished people on our board of directors that have  
12 experience and intellect and vision and -- and  
13 resourcefulness, because ultimately this entire staff in  
14 this building works for the board; and if the board in  
15 some way is not outstanding, it affects the morale of  
16 the entire staff in this building.  
17 Q. Do you trust the NRA board to make decisions  
18 that are in the best interest of the NRA?  
19 A. I do trust the NRA board. I think it's a --  
20 it's a -- it's a very responsible board.  
21 Q. And that includes all board members?  
22 MR. GARMAN: Objection to the form.  
23 A. You know, I always give my respect to -- or  
24 try to, to all board members, to tell you the truth, and  
25 treat them with respect. That doesn't mean I always  
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1 agree with them all, but I always try to respect them  
2 all and listen to them and -- and be civil and decent.  
3 Q. (BY MR. MASON) Do you trust the board to keep  
4 information confidential if you -- if you ask them to do  
5 so?  
6 MR. GARMAN: Objection to form.  
7 Go ahead.  
8 A. I don't think it's any secret if you were to  
9 talk to our -- most of our board, is the board of  
10 directors realizes that in recent years they have had a  
11 problem with leaks out of the board meeting, even in  
12 executive session, real-time information being passed  
13 out -- out of executive session to various individuals  
14 or the media, and it is a problem that the board of  
15 directors is wrestling with as to how to -- how to  
16 function as a board when that type of activity has been  
17 going on.  
18 Q. (BY MR. MASON) And that's a problem here and  
19 now today on March 23rd. Right?  
20 A. I think it is an ongoing concern of a good  
21 number of our board of directors. I don't think they  
22 know who is doing it. I don't think they -- but I just  
23 know that they all believe it has been happening.  
24 Q. Does it make it difficult to be open and  
25 transparent with the NRA board if you're concerned about  
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1 leaks?  
2 MR. GARMAN: Objection to form.  
3 Go ahead.  
4 A. Well, that's one of the concerns the board has  
5 had, is the fact that it makes it difficult for them to  
6 be open and transparent in executive session if they  
7 believe that there's a possibility it will be leaked.  
8 Q. (BY MR. MASON) So how can you trust the NRA  
9 board to make governance decisions that are in the best  
10 interest of the NRA if you're concerned that information  
11 shared with them could be leaked?  
12 MR. GARMAN: Objection to the form of the  
13 question.  
14 A. Well, I think the board struggles in the best  
15 as they can with that circumstance and try to be as open  
16 and transparent as they can, given the fact they are  
17 aware that that type of situation has been occurring.  
18 It's a problem they wrestle with, but I know they try to  
19 be as open and transparent as they can be, recognizing a  
20 reality that has existed.  
21 Q. (BY MR. MASON) Mr. Powell in his book stated,  
22 And as Wayne admitted to me in confidence, they, being  
23 the NRA board, exercised almost no genuine oversight on  
24 the NRA executive leadership.  
25 Did you ever tell Mr. Powell that -- in  
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1 confidence, that the NRA exercised almost no genuine  
2 oversight on the NRA executive leadership?  
3 MR. GARMAN: Objection to the form of the  
4 question.  
5 A. No, I did not tell Mr. Powell that.  
6 Mr. Powell -- I haven't read his book. From what people  
7 have told me about it, he appears to be making up a lot  
8 of things that are not accurate.  
9 Q. (BY MR. MASON) But he also appears to be  
10 making statements that are also true. Right?  
11 MR. GARMAN: Objection to the form.  
12 A. I don't know.  
13 MR. GARMAN: Objection to the form of the  
14 question.  
15 A. I don't know. I haven't read his book.  
16 Q. (BY MR. MASON) Mr. LaPierre, as you sit here  
17 today, are you aware whether the NRA board was told on  
18 January 7 that the NRA was going to be filing for  
19 Chapter 11 bankruptcy?  
20 MR. GARMAN: Objection to the form of the  
21 question.  
22 I instruct you not to answer the contents of  
23 executive session. Otherwise, you can answer the  
24 question.  
25 A. I was not in that session. I -- I do not know  
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1 what the discussion was because I was not in it. All I  
2 know is that out of that session, I was -- came out of  
3 contract that involved me, and a part of that contract  
4 included a delegation of authority to the executive vice  
5 president to reorganize the association.  
6 Q. (BY MR. MASON) So is it your testimony that,  
7 as you sit here right now, you do not know whether the  
8 board was advised of the Chapter 11 bankruptcy on  
9 January the 7th?  
10 MR. GARMAN: Objection to the form of the  
11 question.  
12 Go ahead.  
13 A. I was not in that session. I was not privy to  
14 the discussion as to what took place.  
15 Q. (BY MR. MASON) I understand you were not  
16 present, but my question is more simple than that.  
17 As you sit here right now, are you aware  
18 whether or not the NRA board was advised about the  
19 Chapter 11 bankruptcy on January the 7th?  
20 MR. GARMAN: Objection to the form of the  
21 question.  
22 Go ahead.  
23 A. To the best of my knowledge, the board  
24 delegated authority to the executive vice president to  
25 make decisions on reorganization. And at that point, I  
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1 don't -- a decision had not been made on whether or not  
2 the NRA was going to move to filing Chapter 11  
3 bankruptcy. As I said, without that delegation of  
4 authority by the board to the EVP, I certainly wouldn't  
5 have moved forward with it.  
6 MR. MASON: Objection, nonresponsive.  
7 Q. (BY MR. MASON) Have you had conversations  
8 with board members since the bankruptcy filing on  
9 January the 15th?  
10 A. I have had conversations with board members.  
11 Q. Have any of those board members indicated to  
12 you that they were not advised that the NRA was going to  
13 be filing for Chapter 11 bankruptcy on January the 7th?  
14 A. I've had board members tell me that they --  
15 that they -- they -- yeah, that they did not realize  
16 that, they -- they -- and that's one of the reasons that  
17 I thought it was a good idea to get them all together  
18 and let everyone ask their questions, because I don't  
19 think some of them bothered to read the delegation of  
20 authority to the executive VP to reorganize the  
21 association or ask questions about it.  
22 And in executive session, even though I wasn't  
23 there, any board member could have asked any question  
24 that they wanted to, and I assume the officers would  
25 have responded. But a decision had not been made at  
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1 that point to go that route. I guess it's something  
2 they could have talked about, but a decision had not  
3 been made at that point.  
4 Q. Who are the board members that you're  
5 referring to that you spoke with and had that  
6 conversation with?  
7 MR. GARMAN: Objection to the form of the  
8 question.  
9 Go ahead.  
10 A. About -- about the need for more discussion on  
11 everything?  
12 Q. (BY MR. MASON) Yeah, about the board not  
13 being told that, hey, we're about to go file for  
14 Chapter 11 bankruptcy?  
15 MR. GARMAN: Objection to the form of the  
16 question.  
17 A. Well --  
18 MR. CORRELL: This is Mr. Correll. I  
19 would just like to instruct the witness not to reveal  
20 the substance of any communications with any members of  
21 the special litigation committee that related to  
22 litigation strategy.  
23 A. Yeah, I'm sorry, could you state the question  
24 again?  
25 Q. (BY MR. MASON) Sure.  
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1 You said that you've spoken with board members  
2 since the bankruptcy filing that have indicated to you  
3 that they did not know at the January 7 meeting that  
4 what they were doing was authorizing -- purportedly  
5 authorizing the NRA to file Chapter 11 bankruptcy. And  
6 so my question is who are those board members that you  
7 have had those conversations with?  
8 MR. GARMAN: Objection to form.  
9 A. They didn't -- I wouldn't say they all put it  
10 in exactly the terms you just described, but I talked  
11 with numerous board members that -- that have expressed  
12 the need for -- they would -- and I -- and I believe  
13 this, for an open session where everybody can get  
14 everything out in the open, everyone can ask their  
15 questions.  
16 And now that the NRA has made the decision,  
17 based on the delegation of authority with the SLCs to  
18 file the Chapter 11, they have a discussion about the  
19 whole thing. I've talked to board members, from Susan  
20 Howard to Sandy Froman to -- to Joel Friedman, to --  
21 to -- gosh, I would have to have a list of the board  
22 members in front of me to -- but I talked to probably  
23 10, 15, 20 of them about -- you know, and everyone  
24 agrees that it would be good to get everyone together  
25 and have a full, open discussion of everything.  
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1 Q. (BY MR. MASON) Did any of those board members  
2 express concerns that they wish that there was that  
3 discussion that happened -- let me start over.  
4 Did any of those board members express  
5 concerns to you that -- about those discussions and how  
6 they should have occurred on January the 7th?  
7 MR. GARMAN: Objection to form.  
8 A. I wouldn't say it was so much in relation to  
9 those discussions and how they should have occurred.  
10 It was that they expressed a desire to get everything  
11 out in the open, ask questions, have a full discussion  
12 of everything, everybody get their questions answered,  
13 and -- and that would be -- that's a good thing for the  
14 board and the association, because some of them clearly  
15 did not pay attention or -- or from what -- or follow  
16 that part on the reorganization.  
17 I had one of them tell me, for example, the  
18 only part that he really read was the part that involved  
19 my contract and didn't really pay attention to any of  
20 the rest of the resolution. So I think there -- I think  
21 it would be good for the association to have a board  
22 meeting and a full discussion of everything and  
23 everybody get everything out in the open.  
24 Q. (BY MR. MASON) And a full disclosure with the  
25 board, right, because that didn't happen on January  
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1 the 7th?  
2 MR. GARMAN: Objection to the form of the  
3 question.  
4 A. Well, keep in mind, that discussion could have  
5 gone anywhere the board took it. I wasn't in there, but  
6 in every executive session, every board member has the  
7 right to ask any question that they have at all. And  
8 the person that was chairing the meeting or the other  
9 board members have an opportunity to take the mic and  
10 talk about it. And I wasn't in there. I don't -- I  
11 mean, if -- if questions weren't asked, they weren't  
12 asked, but that's -- that's -- I mean, I wasn't in the  
13 room.  
14 Q. (BY MR. MASON) On January 6, 2021, did you  
15 know that if your employment agreement was approved by  
16 the board on January 7, that you would be having -- that  
17 you would believe that you had the authority to file  
18 Chapter 11 bankruptcy on behalf of the NRA?  
19 MR. GARMAN: Objection to form.  
20 Go ahead and answer if you understand.  
21 MR. CORRELL: Yeah. And to the extent --  
22 this is Mr. Correll. To the extent that you had any  
23 conversations with attorneys on that subject, not saying  
24 you did, but if you did, please steer clear of those  
25 conversations.

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1 A. Well, all of my conversations I had prior to  
2 that were with -- were with attorneys in regard to my  
3 contract and what was in it in terms of -- in terms of  
4 the reorganization.  
5 Q. (BY MR. MASON) And who were those attorneys?  
6 A. I had discussions on my contract with Kent  
7 Correll, my personal attorney. I had discussions  
8 with -- with Bill Brewer.  
9 Q. You testified at the first 341 creditors  
10 meeting that you made the decision for -- to file for  
11 bankruptcy a couple weeks before January 15. Do you  
12 remember that?  
13 MR. GARMAN: Objection to form.  
14 A. I think we made the actual final decision a  
15 couple of days before. As I said, if we had not had  
16 that delegation of authority at the board meeting  
17 through the executive VP to reorganize the NRA, I would  
18 not have gone ahead, at least I wouldn't have, and filed  
19 for that reorganization. So I mean, it -- that's the  
20 case.  
21 There had been discussions of all kinds of  
22 different options that the NRA might take, but no  
23 decisions had been made, strategic alternatives to -- to  
24 dealing with what we believed was a not fair -- fair  
25 playing field in New York state and how -- what do you

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1 do when you're facing that type situation, where we  
2 believed that we were being -- viewpoint discriminated  
3 against by the State of New York, and we believed that  
4 plan that Attorney General Schneiderman had laid out in  
5 2017 was in full operation and in violation of the  
6 organization's constitutional rights. And that's why we  
7 have two First Amendment cases pending against the  
8 Department of Financial Services --  
9 Q. (BY MR. MASON) I understand. I understand.  
10 You've answered my question.  
11 Who is Duane Liptak?  
12 MR. CORRELL: Excuse me. This is Kent  
13 Correll. Please don't interrupt the witness and  
14 allow -- and please do allow the witness to finish his  
15 answer.  
16 Q. (BY MR. MASON) Mr. LaPierre, who is Duane  
17 Liptak?  
18 A. Duane Liptak is a member of the board, or was  
19 a member of the board.  
20 Q. How long was he a member of the board?  
21 Well, let me ask you this. Why is he no  
22 longer a member of the board?  
23 A. He sent in a resignation letter saying that --  
24 I can't remember exactly what it said. I know he said  
25 that he continues to support the organization, he'll do

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1 anything he can to -- to help it. I honestly don't  
2 remember what the rest of the letter said. I read it,  
3 but I just don't remember.  
4 Q. Let's take a look at -- if we can get  
5 Exhibit -- Ackerman Exhibit 148, please.  
6 (AMc Exhibit 148 marked.)  
7 Q. (BY MR. MASON) And if you'll let me know,  
8 Mr. LaPierre, when you've got Exhibit 148 up.  
9 MR. GARMAN: We are pulling it up right  
10 now.  
11 Brian, it's Greg. I keep refreshing, but it's  
12 not there yet. Is it in the folder deposition of Wayne  
13 LaPierre, 3/23 under Marked Exhibits?  
14 MR. CORRELL: It should be. Can I get  
15 delegated access to share my screen please?  
16 MR. GARMAN: Yeah, the screen is pretty  
17 far from us. We'll do our best, but it's probably a  
18 good 15 feet from us. But you can try. We'll do our  
19 best.  
20 MR. CORRELL: Let's go off the record  
21 real quick. Let me get this figured out. Just for one  
22 or two minutes.  
23 MR. GARMAN: We won't leave.  
24 THE VIDEOGRAPHER: We are going off the  
25 record. The time on the video is 11:37 a.m.

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1 (Break from 11:37 a.m. to 11:42 a.m.)  
2 THE VIDEOGRAPHER: We're back on the  
3 record. The time on the record is 11:47 -- I'm sorry --  
4 11:42 a.m.  
5 Q. (BY MR. MASON) Mr. LaPierre, I've got up on  
6 my screen Ackerman Exhibit 148. Can you see the  
7 document on the screen and specifically the email at the  
8 top from Mr. Liptak?  
9 A. Let me -- it's taking me a minute because it's  
10 a long way away. I'm struggling to read it. I see  
11 to -- from Duane Liptak to John Frazer. Subject,  
12 announcement from Wayne LaPierre. And it says -- I can  
13 read it now.  
14 (Witness reading to himself.)  
15 I read -- just read that.  
16 Q. Have you seen this email before?  
17 A. I have not seen that email.  
18 Q. Have you had any conversations with Mr. Liptak  
19 since January the 15th?  
20 A. I have not.  
21 Q. Do you believe -- do you believe Mr. Liptak  
22 would have sent this email to Mr. Frazer if the  
23 Chapter 11 bankruptcy had been discussed at the January  
24 7th board meeting?  
25 MR. GARMAN: Objection to the form of the  
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1 question.  
2 A. Well, I'm speculating. I mean, I --  
3 MR. GARMAN: No, no, no. We're not going  
4 to speculate. I also object to foundation.  
5 Q. (BY MR. MASON) Are you going to answer my  
6 question, Mr. LaPierre?  
7 A. I'd answer your question that I wasn't in the  
8 room, but when a resolution was passed, any board member  
9 had the opportunity to ask any question that they wanted  
10 to ask. And if someone wanted to ask a question in  
11 relation to the reorganization and what that entailed,  
12 which was delegated to the EVP, they had a full  
13 opportunity to do it. I mean, obviously, you know, I  
14 wasn't in the room, so I -- I don't -- I don't know the  
15 full extent of the discussion or how close they got to  
16 it or what they discussed.  
17 Q. Prior to the January 7th board meeting, did  
18 you have any discussions with anyone about not telling  
19 the board of directors at the January 7th meeting that  
20 the NRA was considering filing for Chapter 11  
21 bankruptcy?  
22 MR. GARMAN: Object to the form of the  
23 question.  
24 And simply to the extent your answer would  
25 include counsel, I instruct you not to invade the  
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1 attorney/client privilege, but otherwise you can answer.  
2 A. Yeah, the only discussions I had were with  
3 counsel and with the SLC.  
4 Q. (BY MR. MASON) And that was prior to January  
5 7?  
6 A. That is correct.  
7 Q. And who was the counsel that you're referring  
8 to?  
9 A. That would be Bill Brewer and the special  
10 litigation committee.  
11 Q. So did you have conversations with the special  
12 litigation committee specifically prior to January 7  
13 relating to the NRA filing Chapter 11 bankruptcy?  
14 MR. GARMAN: Objection to the form of the  
15 question.  
16 I again give you the same instruction.  
17 A. And I did not have independent -- any  
18 discussions were in the presence of counsel.  
19 Q. (BY MR. MASON) And I'm not asking you to get  
20 into those discussions. I'm asking you -- well, let me  
21 ask it this way.  
22 Did you ever tell Charles Cotton prior to  
23 January 7 that the NRA is seriously considering about to  
24 file Chapter 11 bankruptcy in Texas?  
25 MR. GARMAN: Objection to the form of the  
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1 question.  
2 Same instruction. You can otherwise answer.  
3 A. We were -- we were working with Charles Cotton  
4 on -- and Charles Cotton was actually having meetings  
5 with the governor of Texas and with other people,  
6 because Texas was, along with about 20 other states,  
7 really were doing everything they can to encourage NRA  
8 to leave the toxic environment in New York, which they  
9 considered, based on their reading of the news and the  
10 information they were receiving from their -- from their  
11 contacts that -- and to reorganize in their state. And  
12 I had the discussions with Charles Cotton about the work  
13 he was doing with the -- with the governor of Texas and  
14 with -- in relation to that.  
15 Q. (BY MR. MASON) Okay. So prior to January 7,  
16 did you specifically tell Mr. Cotton that we are on the  
17 verge of making a decision to file Chapter 11 bankruptcy  
18 and reincorporate in Texas?  
19 MR. GARMAN: Objection to the form of the  
20 question.  
21 I give you the same instruction.  
22 A. I -- I think that Charles was aware that that  
23 was one of the options. I don't think -- a decision had  
24 not been made. It -- but I had discussions with Charles  
25 in terms of reorganizing and -- and moving NRA to a --  
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1 somewhere that wanted the organization, would offer a  
2 fair regulatory environment where the organization could  
3 grow and prosper.  
4 A decision had not been made on how that would  
5 be done, whether it would be Chapter 11, whether it  
6 would be bankruptcy. I think that every -- every option  
7 was being explored, but a decision had not been made.  
8 Q. (BY MR. MASON) Who is Phillip Journey?  
9 A. Phillip Journey is a member of the board of  
10 directors, a previous member of the board of directors,  
11 and he is a former state legislator, I believe. And  
12 he's a judge now, to the best of my knowledge.  
13 Q. How long have you known Judge Journey?  
14 A. Gosh, probably 20, 25 years.  
15 Q. Do you consider him a friend?  
16 A. I mean, I -- I'm friendly with everybody. I  
17 respect everybody. I mean, do we -- do we pal around  
18 together? No, we don't. But I've run into Phil at  
19 numerous meetings on -- speaking on the road over the  
20 years, and we've always had very friendly conversations  
21 and -- yes.  
22 Q. Have you known him to be an honest and  
23 truthful person?  
24 MR. GARMAN: Objection to form.  
25 Go ahead.

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1 A. You know, all I can say is I've had -- I've  
2 had friendly conversations with him, like all kinds of  
3 other people you have friendly conversations with.  
4 Q. (BY MR. MASON) Prior to January 14, did you  
5 consider Mr. -- Judge Journey an honest and truthful  
6 person?  
7 MR. GARMAN: Objection to the form of the  
8 question.  
9 A. You know, again, I don't have -- I don't have  
10 a deep relationship with -- I'm not trying to disparage  
11 Mr. Journey in any way; it's just I don't have the type  
12 of relationship or the amount of experience in terms of  
13 working with to -- you know, I mean, Mr. Journey has  
14 always appeared to me to be, you know, nice and he was  
15 friendly.  
16 In fact, prior to his nomination to the board,  
17 someone called me on the board and said, What do you  
18 think of Phil Journey? And I said, Well, I've run into  
19 him several times and he's always been nice and we've  
20 had nice conversations. And that was my answer.  
21 Q. (BY MR. MASON) Prior to January 15, did you  
22 believe that Judge Journey was a man of integrity?  
23 MR. GARMAN: Objection to the form of the  
24 question.  
25 A. Again, you're asking me to make a judgment

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1 about someone I'm saying I really don't know very well.  
2 I'm not trying to be evasive on the issue; it's just  
3 that if you -- if you -- I mean, if you don't know  
4 somebody very well, it's hard to make an assessment. I  
5 mean, I guess I take everybody at face value, as I  
6 believe there's good in everybody that I meet, you know.  
7 Q. (BY MR. MASON) Prior to --  
8 A. I hope there is.  
9 Q. Prior to January 15, did Judge Journey ever  
10 say or do anything that made you question his integrity?  
11 MR. GARMAN: Objection to the form of the  
12 question.  
13 A. As I've said, the last 15 or 20 years, every  
14 time I've met Phil Journey, Judge Journey, he's been  
15 nice and we had a nice conversation and nothing happened  
16 in those conversations that -- that made me question his  
17 integrity.  
18 I remember back in the days of the '97 and '98  
19 when he was on the board, I thought that -- when there  
20 was an issue going on, I thought some of the decisions  
21 that he made -- was making in terms of how he voted  
22 was -- I thought was the wrong way, but -- and was the  
23 wrong decision, but that was a long, long time ago and,  
24 you know, people change. And I'm somebody that  
25 understands people change, and that's why I responded

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1 the way I responded when the -- when the person called  
2 me about, What do you think about Phil being nominated  
3 for the board? I said, I've got a lot of -- I've run  
4 into him a lot of times and he was friendly and nice.  
5 And I -- basically, I said I've had very nice  
6 conversations with him, even though I think back in the  
7 '90s some of the positions he took on the board I -- I  
8 disagreed with, to the best of my recollection. I  
9 didn't think it was in the best interest of the NRA.  
10 Q. (BY MR. MASON) Was the NRA's filing of  
11 Chapter 11 bankruptcy a major decision for the NRA?  
12 MR. GARMAN: Objection to the form of the  
13 question.  
14 A. Yes, the NRA's decision to file Chapter 11 was  
15 a -- was a major decision.  
16 Q. (BY MR. MASON) The NRA has been in New York  
17 for 150 years. Right?  
18 A. They have.  
19 Q. This was -- this was a historic decision,  
20 wasn't it?  
21 MR. GARMAN: Objection to the form of the  
22 question.  
23 A. Well, it was a decision that -- as I said, the  
24 NRA for years has been talking on and off about the need  
25 to reincorporate in somewhere that offered a friendlier

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1 environment than New York state to the organization.  
2 There were also ongoing discussions even about the NRA's  
3 principal place of operation here in Virginia, that  
4 maybe -- maybe it would be better for our employees to  
5 move into a friendlier place.  
6 So these discussions have been going on for  
7 many, many years, long before the issue of General  
8 Schneiderman's telephone call, Governor Cuomo, DFS,  
9 General James or General James' statement during her  
10 campaign about the NRA being a criminal terrorist  
11 organization and --  
12 Q. (BY MR. MASON) Mr. LaPierre, my question was  
13 much more -- was much more simple than that. Let's move  
14 on.  
15 Would you agree --  
16 MR. CORRELL: This is Kent Correll.  
17 Mr. Mason, again, I would just caution you to allow the  
18 witness to finish his answers and not --  
19 MR. MASON: Not if he's just going to  
20 filibuster, not if I'm asking him simple questions,  
21 so --  
22 MR. CORRELL: Mr. Mason, you have a  
23 duty --  
24 MR. MASON: Let's move on.  
25 MR. CORRELL: Excuse me, Mr. Mason. You  
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1 have a duty as an officer of the court and under the  
2 rules of this court to allow a witness to finish an  
3 answer. It's not for you to decide when the witness is  
4 done.  
5 Q. (BY MR. MASON) Mr. LaPierre, would you agree  
6 that if a company is going to file for Chapter 11  
7 bankruptcy, that that bankruptcy must be authorized?  
8 MR. GARMAN: Objection to the form of the  
9 question, calls for a legal conclusion.  
10 A. The -- the board -- as I've said before, the  
11 board in the resolution that they passed at the January  
12 meeting specifically allocated to the executive VP, and  
13 also did it in consultation with the SLC, the authority  
14 to reorganize the organization. If they had not done  
15 that, I certainly would not have moved forward.  
16 Q. (BY MR. MASON) And on January 6, did you know  
17 that? Did you know that the authorization -- the  
18 approval of your employment agreement would provide you  
19 that authorization?  
20 MR. GARMAN: Objection, asked and  
21 answered.  
22 Go ahead again.  
23 A. I -- I knew that within that delegation that  
24 was being proposed, it would open up the option of doing  
25 that, if we chose to do it, but we had not made a  
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1 decision to do it at that point and would not have done  
2 it if the board did not delegate that authority.  
3 Q. (BY MR. MASON) If the board did not delegate  
4 that authority, are you aware of any other NRA corporate  
5 governance document that provided you with the authority  
6 to file Chapter 11 bankruptcy on behalf of the NRA?  
7 MR. GARMAN: Objection to the form of the  
8 question, calls for legal conclusion.  
9 A. Yeah, I am not aware, but I'm not a lawyer and  
10 I'm not an expert on all of the NRA documents and  
11 bylaws.  
12 But as I said, I would not -- without that  
13 specific delegation of authority from the board in that  
14 resolution that delegated me the ability to reorganize,  
15 I certainly would not have moved forward.  
16 Q. You testified yesterday that on January 15th,  
17 the day that the NRA filed for bankruptcy, you had a  
18 telephone call with the SLC. Is that right?  
19 MR. GARMAN: Objection to the form of the  
20 question.  
21 Go ahead.  
22 A. Yes, I did.  
23 Q. (BY MR. MASON) And on that telephone call was  
24 yourself and Ms. Meadows and Mr. Cotton and Mr. Lee. Is  
25 that correct?  
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1 A. That is correct.  
2 Q. Was that the first time that you told the  
3 members of the SLC that you had made a final decision  
4 with respect to filing Chapter 11 bankruptcy?  
5 MR. GARMAN: Objection to the form of the  
6 question.  
7 MR. CORRELL: Also, this is Mr. Correll.  
8 I would instruct the witness not to divulge any  
9 communications that were made to the SLC for purposes of  
10 obtaining legal advice or assistance for the  
11 organization.  
12 A. The discussions that I had with the SLC at  
13 that point included -- included legal advice from  
14 counselors.  
15 Q. (BY MR. MASON) Were there any attorneys on  
16 that -- on that phone call?  
17 A. Yes.  
18 Q. Mr. Cotton?  
19 MR. GARMAN: Objection to form.  
20 Q. (BY MR. MASON) Or were there other -- were  
21 there other attorneys on besides the four of you?  
22 MR. CORRELL: Objection to the form of  
23 the question. This is Mr. Correll.  
24 A. But I also had -- I also had an independent  
25 call with --  
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1 Q. (BY MR. MASON) Mr. LaPierre, I'm asking about  
2 who was on the call. I believe you said -- I asked you  
3 if there was attorneys on the call, and you said yes.  
4 You said there was four people on the telephone call,  
5 yourself, Mr. Cotton, Mr. Lee and Ms. Meadows. Is that  
6 correct?  
7 MR. GARMAN: Objection to the form of the  
8 question.  
9 You can answer that.  
10 A. Yeah, that's the one I was just going to say.  
11 I had conversation with the three officers of the SLC  
12 and myself where we made the final decision to file --  
13 file for bankruptcy.  
14 Q. So prior to that phone call, had you made a  
15 final decision on the decision to file for bankruptcy?  
16 A. No, that phone call is when we made the final  
17 decision to do it.  
18 Q. How long did that phone call last?  
19 A. I don't remember.  
20 Q. Was that the first time that you told the SLC  
21 that you had made a final decision to file Chapter 11  
22 bankruptcy?  
23 MR. GARMAN: Objection to the form of the  
24 question.  
25 A. No. We had had discussions about it earlier  
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1 in the week and had -- had just not come to a final --  
2 final decision on if and when or the time in which we  
3 were going to do it.  
4 MR. MASON: Let's do this. We've been  
5 going about an hour. Why don't we go ahead and take a  
6 five-minute break, if that's okay.  
7 MR. GARMAN: Sure.  
8 Brian, when do you want to take a lunch break,  
9 so we can plan?  
10 THE VIDEOGRAPHER: Do you want to go off  
11 the record?  
12 MR. GARMAN: Okay. Yeah, we can go off  
13 the record.  
14 MR. MASON: It's up to y'all and  
15 Mr. LaPierre.  
16 THE VIDEOGRAPHER: We're going off the  
17 record. The time on the video is 12:04 p.m.  
18 (Break from 12:04 p.m. to 12:19 p.m.)  
19 THE VIDEOGRAPHER: We're back on the  
20 record. The time on the video is 12:19 p.m.  
21 Q. (BY MR. MASON) Mr. LaPierre, after you and  
22 the special litigation committee made the final decision  
23 to file Chapter 11 bankruptcy, why did you not go back  
24 to the NRA board before actually pulling the trigger and  
25 filing?  
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1 A. Well, there was tremendous concern among the  
2 special litigation committee, in particular, about leaks  
3 and the fact that -- and as we talked about, there was  
4 an ongoing process of leaks, unfortunately, in real-time  
5 from the -- from the board. And the special litigation  
6 committee, in particular -- but I shared the same  
7 concern, but they were very concerned that a leak on  
8 this with the clear intent of General James to dissolve  
9 the National Rifle Association in what we believed, as I  
10 said numerous times, was an improper use of government  
11 authority, that she would -- if leaked, she would  
12 immediately attempt to put the NRA into receivership,  
13 which would, in effect, destroy the organization.  
14 And we, the SLC and I, had a -- I mean, my  
15 gosh, it's a wonderful organization with 5 million  
16 members. It does all kinds of amazing things, as we  
17 talked about, safety training, education, political and  
18 legislative advocacy. It's one of the oldest civil  
19 rights organizations in the country, and it sure doesn't  
20 deserve to be dissolved or put into receivership, so --  
21 and that's why.  
22 Q. Okay. Were there any other reasons, as you  
23 sit here right now, that you can think of?  
24 A. No.  
25 Q. With respect to New York putting the NRA into  
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1 receivership, is that a concern that you came up with on  
2 your own?  
3 MR. GARMAN: So I object.  
4 I instruct you not to divulge the  
5 attorney/client privilege, and any information you  
6 received from counsel on that point, I instruct you not  
7 to respond with.  
8 Q. (BY MR. MASON) Are you going to answer my  
9 question, Mr. LaPierre?  
10 A. No, I'm not. I'm going to take the advice of  
11 counsel on that issue.  
12 Q. And who was the counsel that you're  
13 referencing in refusing to answer that particular  
14 question?  
15 MR. CORRELL: Objection. This is  
16 Mr. Correll. Objection to the extent that the question  
17 implies that any particular counsel was -- was giving  
18 any advice on that issue.  
19 My instruction to the witness is to the extent  
20 that you can answer the question without divulging  
21 communications with attorneys, you can do so. Otherwise  
22 your instruction is not to answer the question.  
23 Q. (BY MR. MASON) And I am not asking you for  
24 any communications, Mr. LaPierre. I am just asking for  
25 the identity of the lawyers that you're refusing to  
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1 answer the question based upon the attorney/client  
2 privilege.  
3 MR. CORRELL: Mr. Mason, you're asking  
4 him, in effect, to identify lawyers who advised him on  
5 the issue of whether -- of litigation strategy with  
6 respect to the pending litigation in New York. I think  
7 that's an improper question. Maybe you can try to  
8 rephrase your question and we can get to a place where  
9 we're more comfortable with your question.  
10 Q. (BY MR. MASON) Let me ask it this way.  
11 Mr. LaPierre, was the concern that you had  
12 with receivership, was that -- was that a concern based  
13 upon communications with counsel?  
14 MR. GARMAN: So I am going to give you  
15 the same instruction. You can answer that question yes  
16 or no.  
17 A. Yeah.  
18 Q. (BY MR. MASON) Who was that counsel?  
19 A. Actually, it was -- it was more than one  
20 counsel.  
21 Q. Okay. Who -- who were the more than one?  
22 MR. GARMAN: So I don't understand the  
23 relevance of this. I'm going to instruct him not to  
24 divulge even who the advice came from. I don't see its  
25 relevance.  
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1 MR. MASON: Relevance is not a proper  
2 objection, and it is not improper. He's already  
3 testified that there was a concern about the NRA going  
4 into receivership and that was based upon communications  
5 with counsel. It's a perfectly appropriate question to  
6 ask who those communications were with without going  
7 into anything else.  
8 MR. CORRELL: This is Mr. Correll. I  
9 respectfully disagree, and I think that if the question  
10 is designed to elicit information as to which counsel  
11 expressed opinions or gave advice on the issue of  
12 whether receivership was -- was something that might be  
13 appropriately -- well, receivership might be a concern  
14 in New York, I think that it's -- you're asking for who  
15 advised him on those issues.  
16 MR. GARMAN: I join in that.  
17 And I instruct you not to answer.  
18 Q. (BY MR. MASON) Mr. LaPierre, are you going to  
19 follow your counsel's instruction?  
20 A. I am.  
21 Q. Did you personally come up with the concern  
22 about -- strike that. I'll come back to that.  
23 Are you familiar with the NRA's bylaws?  
24 A. More or less. I wouldn't say I'm an expert on  
25 the NRA bylaws, but I mean, when a question comes up, I  
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1 usually have to pull out the bylaws and -- as do most  
2 people, and try to find the section and see what it  
3 says.  
4 Q. Are you bound by the NRA bylaws?  
5 MR. GARMAN: Objection to the form of the  
6 question.  
7 A. Yes. I work for the board of directors and  
8 the bylaws that the organization operates under.  
9 Q. (BY MR. MASON) Did your employment agreement,  
10 your January 2021 employment agreement, amend or modify  
11 the NRA bylaws in any way?  
12 MR. GARMAN: Objection to the form of the  
13 question.  
14 A. Not -- not that I'm aware of.  
15 Q. (BY MR. MASON) Let's take a look at -- if we  
16 can look at Ackerman Exhibit 11.  
17 MR. GARMAN: We have Ackerman Exhibit 148  
18 and then we have Exhibits 7 through 10.  
19 MR. MASON: Hopefully it's going to drop  
20 in any second.  
21 MR. GARMAN: We'll keep refreshing.  
22 (AMc Exhibit 11 marked.)  
23 Q. (BY MR. MASON) Let's come back to that.  
24 Let's come back to that if it's not going to be dropped  
25 in there.  
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1 On January 6, were you aware that there was an  
2 officer's compensation committee meeting?  
3 A. That would be the -- I assume that would be  
4 the meeting that took place during the -- during the  
5 board of directors meeting. Was that the date of the  
6 board of directors meeting, the 6th?  
7 Q. This is the day before.  
8 A. Well, I was -- I was with the officers that  
9 day who represent the special compensation committee and  
10 who are the members of the special compensation  
11 committee. I don't know that they had a meeting. They  
12 might have.  
13 Q. So as you sit here right now, you were not  
14 aware as to whether the officers compensation committee  
15 was having a meeting on January 6 with respect to your  
16 employment agreement?  
17 MR. GARMAN: Objection to form.  
18 Go ahead.  
19 A. I was -- I was in a meeting with all three of  
20 those -- all three of those officers on the 6th, but I  
21 wouldn't have been in the part of the meeting where they  
22 did the special compensation committee part.  
23 Q. (BY MR. MASON) Was the meeting that you were  
24 with the SLC on January 6, was that in person? Was  
25 everybody there in person?  
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1 A. They were. I think they were. I can't  
2 remember whether Carolyn -- Carolyn Meadows, I think,  
3 was on the phone.  
4 Q. And were you -- where were the rest of you?  
5 Were you at the Brewer firm offices on January 6?  
6 A. That's correct.  
7 Q. Okay. Let's try this again. Let's see if we  
8 can drop Exhibit 109. It looks like it may be up in  
9 the --  
10 (AMc Exhibit 109 marked.)  
11 MR. GARMAN: Yeah, it's loaded.  
12 Q. (BY MR. MASON) And if you will, please scroll  
13 down to page 11 of 16, please.  
14 Can you see 11 of 16, Mr. LaPierre? At the  
15 top, it says National Rifle Association of America  
16 report of the officers compensation committee?  
17 A. I do see that.  
18 Q. Okay. And then if you go down to the third  
19 paragraph, it says the committee was presented with and  
20 considered an employment agreement negotiated by counsel  
21 for the NRA and counsel for Mr. LaPierre. Questions and  
22 discussion ensued.  
23 Do you see that?  
24 A. I do see that.  
25 Q. Had you seen a copy of your -- a draft copy of  
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1 your employment agreement as of January the 6th?  
2 A. I think I saw a copy of it on January 6th of  
3 what they -- what they had proposed or were proposing.  
4 Q. Prior to January 6th, were you involved at all  
5 in the negotiations with respect to your employment  
6 agreement?  
7 MR. GARMAN: Objection to form.  
8 A. I had talked about it with my --  
9 MR. CORRELL: Excuse me. This is  
10 Mr. Correll.  
11 Q. (BY MR. MASON) And I don't want to get into  
12 conversations between you and Mr. Correll.  
13 MR. CORRELL: Thank you.  
14 Q. (BY MR. MASON) So to the extent that you had  
15 a conversation, I don't want to get into the substance.  
16 My question is just simply -- well, let me ask it this  
17 way.  
18 Prior to January 6th, were you aware of any  
19 negotiations relating to your employment agreement?  
20 A. The communications I -- in terms of this  
21 employment agreement took place between myself and --  
22 and my attorney, Mr. Correll.  
23 Q. Was Mr. Correll present at the Brewer office  
24 on January the 6th?  
25 A. No, I don't believe he was, but he had called  
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1 me -- we had talked about this. He asked me if I was  
2 okay --  
3 Q. I don't -- I don't want to get into  
4 conversations with -- with your counsel.  
5 So let me ask this question. When did you  
6 first execute your employment agreement?  
7 A. I'm sorry. I don't understand the question.  
8 Q. Sure.  
9 Well, let me ask it this way. Prior to the  
10 board meeting on January the 7th, did you -- did you  
11 sign your employment agreement?  
12 A. No, I believe I signed it after -- after the  
13 board meeting -- after the board meeting approved the  
14 employment -- the contract.  
15 Q. Did you have a chance to fully review and  
16 approve the employment agreement before it was presented  
17 to the board on January the 7th?  
18 A. Yeah, I believe the special compensation  
19 committee showed me what they were going to propose on  
20 the 6th, and it was what I had agreed to with my  
21 attorney.  
22 Q. Are you aware that the -- the employment  
23 agreement that was presented to the board on January 7th  
24 did not have a choice of law or choice of venue  
25 provision in it?  
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1 A. I -- I wasn't aware of that. I'm not a  
2 lawyer. I wouldn't have been looking for that.  
3 Q. As you sit here today, do you know why your  
4 employment agreement that was presented to the board on  
5 January 7th did not have a choice of law or choice of  
6 venue provision?  
7 A. I do not. I mean, those are legal questions  
8 that I just would not have focused on.  
9 Q. Who would be the people to ask to find the  
10 answer to that question?  
11 A. I think the special compensation committee.  
12 Q. Anyone else?  
13 A. Well, whoever the special compensation  
14 committee worked with from a legal standpoint, if they  
15 worked with someone.  
16 Q. Did you notice when reviewing your employment  
17 agreement that was going to be presented to the board  
18 that it did not have a choice of law or choice of venue  
19 provision?  
20 MR. GARMAN: Objection to form.  
21 Go ahead.  
22 A. I did not. I mean, that would be something  
23 that I did not -- not being a lawyer, would not have  
24 focused on, did not understand, would not even realize  
25 that needed to be in there, if it did.  
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1 Q. (BY MR. MASON) As you sit here today, do you  
2 know that the employment agreement that was presented to  
3 the board on January 7th did not have a choice of law or  
4 choice of venue provision?  
5 A. I did not know that.  
6 Q. You still did not know that as you sit here  
7 today?  
8 A. No, I -- I did not know that until after the  
9 board -- board meeting when I remember -- when I sat  
10 down and signed the agreement after the board meeting,  
11 after it had been approved, I noticed that it said  
12 something about the state of Texas and -- on it. That's  
13 the first I noticed it.  
14 Q. Are you aware of any negotiations that took  
15 place with respect to the choice of law or choice of  
16 venue provision in the employment agreement that you  
17 ultimately executed?  
18 A. I am not. The first I saw it was when I was  
19 there with -- I believe sitting there with Charles  
20 Cotton and I signed the agreement.  
21 Q. Do you know if any other -- any other states  
22 or forums besides Texas were considered for the choice  
23 of law and venue provision in your employment agreement?  
24 MR. GARMAN: Objection to form.  
25 Go ahead.

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1 A. I don't, because I did not even understand  
2 that that was necessary to be put in there or that there  
3 was a discussion going on around it or that it was going  
4 to happen. I just -- not being a lawyer, it's just not  
5 something that I would have looked for or understood.  
6 Q. (BY MR. MASON) Fair enough.  
7 So is it fair to say that you just left that  
8 up to the attorneys?  
9 A. I -- the fair thing to say is that I noticed  
10 that it was there when I signed the contract and had not  
11 noticed anything about it until I happened to see it  
12 when I was signing the contract.  
13 Q. How did you notice it after when you were  
14 signing the contract if you didn't notice it when you  
15 originally reviewed the employment agreement before the  
16 January 7th board meeting?  
17 MR. GARMAN: Objection to form.  
18 Go ahead.  
19 A. Because I don't -- I don't think it was there  
20 in the original draft that I -- that I saw.  
21 Q. (BY MR. MASON) And so --  
22 A. It was the part that I talked about with my  
23 attorney in terms of the conditions of employment and  
24 the -- you know, and the fact that NRA, not me, had  
25 certain -- at their discretion, certain rights to -- to

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1 my name for fundraising if they decided they wanted to  
2 do it, at their discretion, not mine.  
3 Q. Do you know all of the people -- or let me ask  
4 it this way. Do you know the people that reviewed a  
5 draft of your employment agreement before it was  
6 presented to the board on January the 7th?  
7 A. I don't know. I know the -- I know the -- I  
8 know the officers did. I don't know whether any other  
9 board members did or not.  
10 Q. Why did your employment agreement that was  
11 presented to the board on January 7th not include  
12 specific language delegating you the power to file  
13 Chapter 11 bankruptcy on behalf of the NRA?  
14 MR. GARMAN: Objection to the form of the  
15 question.  
16 A. Why did my employment agreement not include  
17 that language?  
18 Q. (BY MR. MASON) Yes.  
19 MR. GARMAN: Objection to the form of the  
20 question.  
21 A. Because it was my -- the part I had was my  
22 contract with the -- with the -- involving my employment  
23 with the NRA.  
24 Q. (BY MR. MASON) But if I understand your  
25 testimony --

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1 A. I saw -- I saw it on the 6th, a second part of  
2 that contract that talked about the delegation to the  
3 EVP about reorganizing the association.  
4 Q. When you reviewed that contract on January  
5 6th, did you understand that that reorganization  
6 language in the employment agreement would have provided  
7 you with the authority to file Chapter 11 bankruptcy on  
8 behalf of the NRA?  
9 MR. GARMAN: Objection to the form of the  
10 question.  
11 Go ahead and answer.  
12 A. I think I understood that it would give the  
13 EVP wide latitude in terms of strategic alternatives  
14 to -- in terms -- in terms of how it proceeded forward  
15 with the NRA and that one of them would have been --  
16 would have been pursuing the Chapter 11.  
17 Q. (BY MR. MASON) So why was -- why was that not  
18 put into the employment agreement? Why -- why was --  
19 why was there not bankruptcy language added into the  
20 employment agreement?  
21 MR. GARMAN: Objection to the form of the  
22 question and the characterization.  
23 A. I don't know. I don't know. All I know is I  
24 read the -- I read the piece of paper all the way  
25 through, and I don't know the why.

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1 Q. (BY MR. MASON) Is that something that you  
2 relied on your lawyers for?  
3 MR. CORRELL: This is Mr. Correll.  
4 Objection to the form.  
5 A. The part that I was focused on was my part of  
6 the contract. I know that the -- the -- you know, the  
7 SLC or somebody added the second part to it.  
8 MR. MASON: Let's do this. Why don't we  
9 go ahead and take a lunch break, if that's works for  
10 everybody.  
11 MR. GARMAN: Sure.  
12 THE VIDEOGRAPHER: We're going off the  
13 record. The time on the video is 12:45 p.m.  
14 (Break from 12:45 p.m. to 1:36 p.m.)  
15 THE VIDEOGRAPHER: We're back on the  
16 record. The time on the video is 1:36 p.m.  
17 Q. (BY MR. MASON) Mr. LaPierre, are you ready to  
18 proceed?  
19 A. I am.  
20 Q. Hopefully you've got Exhibit -- Ackerman  
21 Exhibit 11 in front of you. Do you recognize those to  
22 be the most recent NRA bylaws?  
23 A. I do.  
24 Q. Okay. Could you go to page 23 for me, please?  
25 Let me know when you're there, please?

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1 MR. GARMAN: Hey, Counsel, the way we're  
2 set up in here, I have to do the scrolling. It's Greg.  
3 So we're almost there. Okay.  
4 Q. (BY MR. MASON) Do you see article VI,  
5 Mr. LaPierre, executive committee?  
6 MR. GARMAN: Oh, you mean 23 -- do you  
7 mean 23 of the bylaws or the page of the exhibit?  
8 MR. MASON: Page 23 of the bylaws. I  
9 guess it looks like page 27 of 60 on the PDF.  
10 MR. GARMAN: We're on page 23. Go ahead.  
11 Q. (BY MR. MASON) Do you see the section titled  
12 article VI, Mr. LaPierre?  
13 A. I do.  
14 Q. And that's related to the executive committee.  
15 Right?  
16 A. That's correct.  
17 Q. And then do you see at the bottom, section 2,  
18 powers and duties?  
19 A. I do.  
20 Q. And it says the executive committee shall  
21 exercise all of the powers of the board of directors  
22 when said board is not in session, other than the powers  
23 to -- and then there's a list of various things. Do you  
24 see that?  
25 A. I do.

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1 Q. On section a here, it says repeal or amend the  
2 bylaws or adopt new bylaws. Do you see that?  
3 A. Repeal or amend -- yeah, I do see that.  
4 Q. So is it your understanding that the board of  
5 directors has the power to -- strike that.  
6 Is it your understanding that the board of  
7 directors has the sole power to repeal or amend the  
8 bylaws or adopt new bylaws?  
9 MR. GARMAN: Objection to the form of the  
10 question.  
11 A. Yeah, I mean, I am not a lawyer, but that's  
12 the way -- that's they way that reads.  
13 Q. (BY MR. MASON) Okay. If you'll go down to  
14 the next page, please, section f. Do you see where it  
15 says the board has the power to adopt and disseminate a  
16 fundamental change of view or basic policy or basic  
17 organizational structure of the association? Do you see  
18 that?  
19 A. I do.  
20 Q. Is it your understanding that the board has  
21 the sole authority to adopt and disseminate a  
22 fundamental change of view or basic policy or basic  
23 organizational structure of the association?  
24 MR. GARMAN: Object to the form of the  
25 question.

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1 You can answer.  
2 A. From what I -- from what I understand, that  
3 the board also had the power to delegate to the EVP's  
4 office the authority to restructure the organization.  
5 I've heard -- well, I shouldn't get into  
6 privileged conversation with lawyers on this, but --  
7 MR. GARMAN: Right. Stop there.  
8 THE WITNESS: Yeah.  
9 Q. (BY MR. MASON) So is it -- is it your  
10 understanding that your January 2021 employment  
11 agreement modified or changed the section f that we just  
12 read here?  
13 MR. GARMAN: Object to the form of the  
14 question.  
15 A. My understanding is that in my -- that 2020  
16 employment agreement, it delegated the board -- the full  
17 board delegated to the EVP's office the authority to  
18 reorganize the -- the association.  
19 Q. (BY MR. MASON) Okay. So it's your  
20 understanding then that, according to f here, that the  
21 executive vice president now has the power to adopt and  
22 disseminate a fundamental change of view or basic policy  
23 or basic organizational structure of the association?  
24 MR. GARMAN: Objection to the form of the  
25 question.

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1 A. I understand that the full board has the  
2 power -- has the power to delegate to the executive vice  
3 president the authority to reorganize the association  
4 and the full board operates under the bylaws of the  
5 association.  
6 Q. (BY MR. MASON) My question is a little bit  
7 more simple than that.  
8 Did the full board authorize the executive  
9 vice president to adopt and disseminate a fundamental  
10 change of view or basic policy or basic organizational  
11 structure of the association?  
12 MR. GARMAN: Objection to the form of the  
13 question.  
14 A. The board delegated to the executive vice  
15 president in a -- in a resolution that they passed at  
16 the board meeting in Dallas the authority to reorganize  
17 the association.  
18 Q. (BY MR. MASON) So is the answer to my  
19 question yes?  
20 MR. GARMAN: No, objection to the form of  
21 the question.  
22 A. No, my answer is that the board delegated the  
23 authority to the executive vice president at the full  
24 board meeting in Dallas to do a reorganization.  
25 Q. (BY MR. MASON) Do you see the word  
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1 "reorganization" anywhere in subsection f?  
2 MR. GARMAN: Objection to the form of the  
3 question.  
4 A. No, I don't see the word, but that's what was  
5 in the resolution that was passed by our full board of  
6 directors at the board meeting.  
7 Q. (BY MR. MASON) Let's go down to subsection i.  
8 Do you see where it says present a petition for judicial  
9 dissolution or to adopt plans of merger, consolidation,  
10 or nonjudicial dissolution? Do you see that?  
11 A. I do.  
12 Q. Would you agree with me that the board has the  
13 sole authority to present a petition for judicial  
14 dissolution or adopt plans of merger, consolidation or  
15 nonjudicial dissolution?  
16 MR. GARMAN: Objection to the form of the  
17 question.  
18 A. I would agree that that language -- that's  
19 what that language says. On the other hand, the board  
20 of directors at the Dallas meeting delegated the  
21 authority to the executive vice president's office to do  
22 a re -- to reorganize the association, and that is who I  
23 work for, is the board of directors.  
24 Q. (BY MR. MASON) Did the board of directors  
25 designate you the power to adopt a plan of merger?  
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1 MR. GARMAN: Objection to the form of the  
2 question.  
3 A. They -- they delegated through the EVP's  
4 office the authority to reorganize the -- the  
5 association.  
6 MR. MASON: Objection, nonresponsive.  
7 Q. (BY MR. MASON) Do you know what the word  
8 "merger" means?  
9 MR. GARMAN: Objection to the form of the  
10 question to the extent that it calls for a legal  
11 conclusion.  
12 MR. CORRELL: Also, I object to your  
13 objection. I don't think you can object to your own  
14 question. If you're moving to strike, I think that  
15 would be the proper response.  
16 Q. (BY MR. MASON) Do you know what "merger"  
17 means, Mr. LaPierre?  
18 MR. GARMAN: Same objection.  
19 A. Tell me what it means.  
20 Q. (BY MR. MASON) I'm asking you if you know  
21 what it means.  
22 A. I -- I don't know exactly what it means as  
23 it's -- as it's stated there. I mean, what I do know is  
24 that board at that board meeting passed a resolution  
25 giving the EVP the authority to reorganize the  
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1 association, and it was with that authority that I and  
2 the SLC did what we did. And there was an opportunity  
3 for full debate at that board meeting. I wasn't in the  
4 session, but that's what happened.  
5 Q. Did the NRA board designate the executive vice  
6 president with the power to petition for judicial  
7 dissolution or adopt a plan of merger, consolidation or  
8 nonjudicial dissolution in your January 2021 employment  
9 agreement?  
10 MR. GARMAN: Objection to the form of the  
11 question.  
12 A. They -- they passed a resolution authorizing  
13 the EVP to reorganize the association and -- and beyond  
14 that, I would be getting into discussions, all kinds of  
15 discussions with lawyers as to what that authority  
16 involved.  
17 Q. (BY MR. MASON) Let's go town to subsection k.  
18 Do you see where it says formulate such other corporate  
19 policy decisions or perform corporate activities of the  
20 association of such major significance as to warrant  
21 action by the full board of directors? Do you see that?  
22 A. I do.  
23 Q. Do you believe that the filing of Chapter 11  
24 bankruptcy is an activity of the association of such  
25 major significance?  
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1 MR. GARMAN: Objection to the form of the  
2 question.  
3 A. I'll give you -- I mean, I'll give you the  
4 same answer. I mean, I understood that with that  
5 resolution passed by the full board of directors, they  
6 were delegating to the EVP's office, the executive vice  
7 president's office, the authority to reorganize the  
8 association, and it was under that authority delegated  
9 by the full board of directors to the EVP's office that  
10 I, in consultation with the SLC, took the action that we  
11 took.  
12 Q. (BY MR. MASON) Was the filing of Chapter 11  
13 bankruptcy a major action for the NRA?  
14 MR. GARMAN: Objection to the form of the  
15 question.  
16 A. I think I've already said it was -- it was a  
17 major -- major item. Significant.  
18 Q. (BY MR. MASON) Yeah. Okay.  
19 Do you intend to ask the board of directors to  
20 ratify the filing of the bankruptcy on March the 28th?  
21 MR. GARMAN: Objection to the form of the  
22 question.  
23 And I instruct you not to answer to the extent  
24 that your answer would constitute our legal strategy and  
25 the discussions with counsel.

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1 A. I will take the advice of counsel on that.  
2 MR. CORRELL: This is Mr. Correll. I add  
3 that instruction. I join in that instruction.  
4 Q. (BY MR. MASON) Mr. LaPierre, the employment  
5 agreement that you've been referencing that provides you  
6 the authorization to reorganize the Chapter 11 -- I'm  
7 sorry, let me back up.  
8 The employment agreement that you have been  
9 referencing here today that discusses the power of you  
10 reorganizing the National Rifle Association, is -- is  
11 that employment agreement the one that was reviewed and  
12 approved by the board of directors on January the 7th?  
13 A. That would be correct.  
14 Q. The one that was approved by the board of  
15 directors, though, it didn't have the choice of law or  
16 choice of venue provision in it, did it?  
17 A. Again, I wasn't -- I wasn't in that board  
18 meeting. I was -- I was not -- because it involved me,  
19 I wasn't there. I testified earlier that I did not see  
20 that choice of venue provision until I actually sat down  
21 to sign the contract after that board meeting was over.  
22 Q. At one point the Brewer firm represented both  
23 the NRA and yourself individually. Isn't that true?  
24 A. No. The Brewer firm represented the National  
25 Rifle Association, and the minute General James' office

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1 filed individual charges against John Frazer and also  
2 against me personally, the Brewer firm recused  
3 themselves from representing me. And I -- I found a  
4 lawyer to represent me, Kent Correll. And John Frazer  
5 found out that the Brewer firm made it very clear they  
6 could no longer represent us individually.  
7 Q. Are you aware you're an individual defendant  
8 in the litigation between the NRA and Ackerman McQueen?  
9 MR. GARMAN: Objection to form.  
10 A. I am aware of a lawsuit Ackerman McQueen filed  
11 against -- against me.  
12 Q. (BY MR. MASON) And prior to the -- prior to  
13 the filing of the New York Attorney General lawsuit, do  
14 you know who represented you in your individual  
15 capacity?  
16 A. Prior to the filing of the attorney general's  
17 lawsuit against the NRA and against John Frazer and  
18 myself?  
19 Q. Correct.  
20 A. The Brewer firm was representing the NRA.  
21 Q. Were they representing you as well  
22 individually?  
23 A. Not individually. They were representing  
24 me -- they were representing NRA, who I work for.  
25 Q. But you aren't aware -- you're not aware if

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1 the Brewer firm was ever representing you in your  
2 individual capacity in the district court litigation  
3 against Ackerman McQueen?  
4 MR. GARMAN: Objection to the form of the  
5 question.  
6 MR. CORRELL: Timeframe? Is there a  
7 timeframe on that question?  
8 Q. (BY MR. MASON) Let me ask it this way.  
9 In early 2020, Mr. LaPierre, who was  
10 representing you in your individual capacity in the  
11 district court litigation against Ackerman McQueen?  
12 MR. CORRELL: Objection to the form.  
13 This is Mr. Correll.  
14 A. I think that district court -- that  
15 legislation (sic) was against the National Rifle  
16 Association at that time, as far as I know.  
17 Q. (BY MR. MASON) Are you aware that you've been  
18 an individual defendant in the district court litigation  
19 with Ackerman McQueen since the fall of 2019?  
20 MR. CORRELL: This is Mr. Correll.  
21 Objection to form.  
22 A. I -- I believed until that -- that recent  
23 lawsuit that -- that Ackerman McQueen legislation (sic)  
24 was against the National Rifle Association.  
25 Q. (BY MR. MASON) Okay. So prior to the New

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1 York Attorney General's lawsuit that was filed in August  
2 of last year, you were not aware that you were an  
3 individual defendant in the litigation between Ackerman  
4 McQueen and the NRA in Dallas, Texas federal court?  
5 MR. CORRELL: This is Mr. Correll.  
6 Objection to form.  
7 A. As far as I knew, that legislation (sic) was  
8 against the National Rifle Association.  
9 Q. (BY MR. MASON) Okay. So the answer to my  
10 question is, no, you did not know that?  
11 MR. CORRELL: Objection to form.  
12 Mr. Correll.  
13 A. I don't think -- I don't think I did.  
14 Q. (BY MR. MASON) When you -- when the New York  
15 AG action was filed and you decided to find a different  
16 attorney, how did -- well, let me ask you this.  
17 Mr. Correll was the one that ultimately agreed to  
18 represent you. Correct?  
19 A. That's correct.  
20 Q. And how were you introduced to Mr. Correll?  
21 A. He was a reference from -- from the Brewer  
22 firm.  
23 Q. Who is Wit Davis?  
24 A. Wit Davis is general counsel to the board of  
25 directors.

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1 Q. How was he -- or do you know who recommended  
2 Mr. Davis for the counsel position to represent the  
3 board?  
4 MR. GARMAN: Objection to form.  
5 Go ahead.  
6 A. I'm not sure. It -- I'm not sure. It may  
7 have been the Brewer firm. It may not have. I know  
8 that he was interviewed by -- I don't think I  
9 interviewed him. He was interviewed by several members  
10 of the board of directors, and they agreed to hire --  
11 and they hired him.  
12 Q. (BY MR. MASON) Are you aware that Mr. Davis  
13 is a former client of Mr. Brewer's?  
14 A. I had heard that.  
15 Q. Are you aware that Mr. Correll is a former  
16 partner of Mr. Brewer's?  
17 A. I did know that, and I knew they had been on  
18 the same side and on opposite sides of some cases over  
19 the years, is what -- in discussions with my lawyer.  
20 Q. Mr. Marshall Smith, the former proposed CRO,  
21 was he recommended by Mr. Brewer as well?  
22 A. I believe he was.  
23 Q. Did you attend a meeting in October of 2018  
24 with Craig Spray and various representatives from  
25 Ackerman McQueen?

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1 A. I did.  
2 MR. GARMAN: Objection to the form of the  
3 question.  
4 Go ahead.  
5 A. Yes, I did.  
6 Q. (BY MR. MASON) During that meeting, was there  
7 a discussion -- let me back up.  
8 During that meeting, did members of --  
9 representatives of Ackerman McQueen express concerns  
10 with respect to the Brewer law firm?  
11 MR. GARMAN: Objection to form.  
12 Go ahead.  
13 A. You know, the purpose of that meeting was to  
14 try to find cost reductions for the budget going forward  
15 from 2018 into 2019, and it was -- I remember the  
16 Ackerman McQueen people were incredibly hostile. I  
17 remember Angus McQueen pointing his finger at me and  
18 saying, You're dead to me. Don't you understand it?  
19 You're dead to me.  
20 And all I was trying to do was, given the  
21 budget situation of the NRA and given the fact that I  
22 felt that NRATV -- we had gotten to the point where we  
23 were putting a huge amount into NRATV and we couldn't  
24 see the return --  
25 Q. (BY MR. MASON) Mr. LaPierre, I asked you a

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1 very simple question.  
2 MR. CORRELL: Excuse me. Please --  
3 MR. MASON: No. I asked him a very  
4 simple question.  
5 MR. CORRELL: Excuse me. Excuse me. I'm  
6 representing this witness, sir. Please hear my  
7 objection. My objection is that you are not allowing  
8 the witness to answer the question. You are  
9 interrupting him because apparently you don't like the  
10 answer.  
11 MR. MASON: No.  
12 MR. CORRELL: It is not for you, sir, to  
13 decide -- you are not the judge here. Excuse me, sir.  
14 It's not for you to decide whether the judge hears this  
15 testimony or not. Okay. Please let him continue.  
16 MR. MASON: Okay. So just so I'm clear,  
17 your position is whatever question I ask, the witness  
18 can just talk for seven hours and I have no right to  
19 stop that?  
20 MR. CORRELL: I will suggest that you ask  
21 your questions in a manner that promotes a succinct  
22 exchange, and if you ask a why question or an open-ended  
23 question, you are inviting the witness to explain and to  
24 give you a full explanation and not just the answer you  
25 want.

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1 MR. MASON: And that's exactly what I  
2 did. Let's move on.  
3 Q. (BY MR. MASON) Mr. LaPierre, during that  
4 October 2018 meeting, did representatives of Ackerman  
5 McQueen express concerns to you about the Brewer firm?  
6 A. You know, Ackerman McQueen had been -- ever  
7 since we started down this course reduction -- course  
8 correction and to look at every employee and every  
9 vendor and see all their records, Ackerman McQueen had  
10 been incredibly hostile towards -- towards Mr. Brewer.  
11 And it had been incredibly hostile toward Mr. Brewer,  
12 despite the fact that he was simply defending NRA on  
13 litigation involving the Department of Financial  
14 Services in New York state and other issues that might  
15 arise from the AG and attempting to do the right thing  
16 in terms of looking at everyone's records. And we  
17 didn't think anyone was doing anything wrong, just to  
18 make sure that we were in compliance with New York state  
19 not-for-profit law.  
20 Q. Did --  
21 A. And there was an incredible amount of  
22 hostility from the very start, early -- well, let me say  
23 early on, maybe not from the very start, toward  
24 Mr. Brewer.  
25 Q. Mr. LaPierre, in the summer around that 2018  
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1 time period, were you aware of -- did you ever hear  
2 anyone say that the FBI was going to raid Ackerman's  
3 offices?  
4 MR. GARMAN: Objection to the form of the  
5 question.  
6 Go ahead.  
7 A. No, I didn't hear anyone say that.  
8 Q. (BY MR. MASON) So you're not aware of  
9 Mr. Brewer stating that the FBI was going to raid  
10 Ackerman McQueen's offices?  
11 A. I'm not --  
12 MR. CORRELL: This is Mr. Correll. I  
13 object to the form of the question.  
14 A. I am not aware of that. What I am aware of is  
15 from the very first time I asked that we wanted to do a  
16 review of the Ackerman McQueen records, I remember Angus  
17 McQueen going off on a rant on the AG in New York has no  
18 right to see our records, the AG -- we're a Texas  
19 company, an Oklahoma company, the AG will never see our  
20 records. And -- and I remember they have no right to.  
21 And I remember that he went off and then said  
22 and you're a complete fool to have sued the governor of  
23 New York and the Department of Financial Services,  
24 they're probably popping the champagne corks up there  
25 because that's exactly what they want you to do.  
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1 And he just went into a complete rant.  
2 Q. So you never heard Mr. Brewer, Josh Powell or  
3 Steve Hart say anything about the FBI raiding Ackerman  
4 McQueen's offices?  
5 A. I did not.  
6 Q. Around that same time, did you ever hear from  
7 Mr. Brewer or anyone else that Mr. Brewer was going to  
8 have Ackerman McQueen brought up on RICO charges?  
9 A. I don't think I did. All we were trying to do  
10 was do a review of records so that if something was  
11 being done -- and we didn't think anyone was doing  
12 anything wrong -- that was out of compliance with New  
13 York state not-for-profit law, we wanted to do exactly  
14 what Attorney General Schneiderman told us to do, which  
15 was to self-correct, and that's why we were trying to do  
16 the review. No other reason at all.  
17 Q. So when did -- when did you come to the  
18 conclusion that Ackerman wasn't complying with the NRA's  
19 request?  
20 MR. GARMAN: Objection to form.  
21 A. Well, this went on throughout 2018. I  
22 remember during the summer of 2019 numerous  
23 conversations with Angus on the phone where he was using  
24 all kinds of cuss words at me, you know, about you're  
25 not going to see our records and what's wrong with you  
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1 and, you know, culminating at that meeting in October  
2 where he's pointing at me and saying you're dead to me  
3 right now and don't you understand?  
4 And then it became very apparent to us in 2019  
5 that they had no intention of letting us see their  
6 records. And in order -- we did what we had to do,  
7 which we sued for our right under the contract to -- to  
8 see the records.  
9 Q. (BY MR. MASON) Were you aware that the NRA  
10 had conducted any audits of Ackerman around that time?  
11 MR. GARMAN: Objection to the form.  
12 Go ahead.  
13 A. I thought that the NRA was doing constant --  
14 the NRA's treasurer's office was doing constant audits  
15 of Ackerman every year.  
16 Q. (BY MR. MASON) But were you aware that in the  
17 fall of 2018 and the beginning part of 2019, were you  
18 aware that there was three different audits that the NRA  
19 did of Ackerman McQueen's books and records?  
20 MR. GARMAN: Objection to form.  
21 Go ahead.  
22 A. I'm aware that there was -- there was  
23 something that was done, a little bit done by, I don't  
24 know, some company that -- I know NRA was trying  
25 numerous ways to look at the records. And to the best  
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1 of my memory, those attempts never got far enough to --  
2 to serve the purpose that NRA needed to to fulfill its  
3 obligations, to look at all the records to see if  
4 something was out of compliance and, therefore, correct  
5 it, that those -- I'm aware that a number of different  
6 attempts were made, but they never were allowed to get  
7 to the point where they would fulfill the mission that  
8 the NRA was trying to achieve.  
9 Q. (BY MR. MASON) Were you aware that between  
10 August -- or September of 2018 and February 2019, there  
11 was three separate audits that the NRA did where they  
12 physically went to the Ackerman McQueen's business and  
13 inspected their books and records? Are you aware of  
14 that, as you sit right here today?  
15 A. When you say the "NRA," what do you mean by  
16 the NRA?  
17 Q. The NRA or the NRA's representatives.  
18 Well, let me ask it this way. Were you aware  
19 that the Brewer firm went to Ackerman McQueen's offices  
20 and conducted an audit?  
21 MR. GARMAN: Objection to form.  
22 Go ahead.  
23 A. I -- from what I understand, that whatever any  
24 of those attempts, they never were allowed to see the  
25 amount of information they needed to see to fulfill the  
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1 duty to look at the records to make an assessment as to  
2 whether there was something that needed to be  
3 self-corrected. And there was tremendous frustration on  
4 the part of the NRA and its attorneys that those  
5 attempts were never allowed to get far enough to do the  
6 diligence that the NRA needed to do to see if there was  
7 something that was out of compliance that needed to be  
8 corrected.  
9 Q. (BY MR. MASON) How do you know that Ackerman  
10 McQueen did not comply with the audits and the documents  
11 that were being requested? How do you know that?  
12 A. That gets into conversations with attorneys.  
13 It's conversations with attorneys.  
14 MR. CORRELL: This is Mr. Correll. I  
15 instruct the witness not to answer the question as it  
16 would require him to divulge attorney/client  
17 communication with attorneys.  
18 Q. (BY MR. MASON) And without going into any of  
19 the communications, were those communications with the  
20 Brewer law firm?  
21 A. They were.  
22 Q. The -- the final audit -- do you know -- have  
23 you heard of Forensic Risk Alliance before? Does that  
24 ring a bell for one of the audits?  
25 A. I've heard that name.  
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1 Q. Were you aware that the NRA had retained  
2 Forensic Risk Alliance in early 2019 to conduct an  
3 audit -- a third audit of Ackerman McQueen's books and  
4 records?  
5 MR. GARMAN: Objection to form.  
6 Go ahead.  
7 A. I believe I was aware of that.  
8 Q. (BY MR. MASON) Do you know how long that  
9 audit lasted?  
10 A. I don't. All I know is from what I  
11 understood, that was one of them that never was allowed  
12 to get to the point where -- to see all the records  
13 where they could do the diligence to say they had seen  
14 everything and whether something needed to be corrected  
15 or not.  
16 Q. And so what --  
17 A. I think the last thing NRA wanted to do was  
18 sue Ackerman McQueen. We didn't believe they were doing  
19 anything wrong. They had been a long-time partner of  
20 the association. They had done great work for the  
21 association. And I just kept saying, look, we don't  
22 think you've done anything wrong, we just need to see  
23 the records.  
24 Q. And as you sit here right now, you don't  
25 actually have personal knowledge of whether Ackerman  
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1 complied with the records request in all those three  
2 audits, do you?  
3 MR. GARMAN: Objection to the form of the  
4 question.  
5 A. I wasn't personally on the scene, but I --  
6 what I would be responding to would be conversations  
7 with attorneys as to what they told me.  
8 Q. (BY MR. MASON) And you're aware of  
9 Mr. Brewer's relationship with the McQueen family.  
10 Right?  
11 A. I am.  
12 Q. And you're aware that there are -- you're  
13 aware that there has been prior hostilities between  
14 Mr. Brewer and certain members of the McQueen family.  
15 Right?  
16 MR. GARMAN: Objection to form.  
17 A. I don't know the extent of the hostilities.  
18 I -- all I know is that Mr. Brewer married the daughter  
19 of Angus McQueen, and I -- apparently there was some  
20 unhappiness about that.  
21 Q. (BY MR. MASON) Did you ever tell anyone from  
22 Ackerman McQueen that Mr. Brewer was the only one that  
23 could keep you out of jail?  
24 A. No, I did not.  
25 Q. Did you ever tell anyone from Ackerman McQueen  
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1 anything about going to jail?  
2 A. No, I did not.  
3 Q. Did you ever tell Mr. Powell that Mr. Brewer  
4 was the only one that could keep you from going to jail?  
5 A. No, I did not.  
6 Q. Did you ever tell Steve Hart that Mr. Brewer  
7 was the only person that could keep you from going to  
8 jail?  
9 A. No, I did not.  
10 Q. Did you ever tell Colonel North that  
11 Mr. Brewer was the only person that could keep you from  
12 going to jail?  
13 A. No, I did not. You can put all that down with  
14 the intern story about -- that I did not have an affair  
15 with either.  
16 Q. Have you read the sworn testimony from those  
17 various individuals that have stated that you did tell  
18 them that? Have you read that?  
19 MR. GARMAN: Objection to form.  
20 A. No, I haven't, but I know the truth doesn't  
21 seem to bind a lot of these people these days, the last  
22 year or two.  
23 Q. (BY MR. MASON) So why should the Court  
24 believe you as opposed to them?  
25 MR. GARMAN: Objection to form.

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[REDACTED]

23 Q. (BY MR. MASON) Mr. LaPierre --  
24 MR. CORRELL: Excuse me, sir. Could you  
25 let him finish his answer?

[REDACTED]

1 A. Because it's the truth, as is the fact that I  
2 didn't have an affair with the intern that they keep  
3 flowing out.  
4 Q. (BY MR. MASON) Let's take a look at  
5 Exhibit 59, if we could drop that into the shared  
6 folder, please.  
7 (AMc Exhibit 59 marked.)  
8 Q. (BY MR. MASON) If you can let me know when  
9 you have this up, Mr. LaPierre.  
10 MR. GARMAN: We have the first page up.  
11 Q. (BY MR. MASON) Mr. LaPierre, have you seen  
12 Exhibit 59 before?  
13 A. I don't think I have.  
[REDACTED]

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1 MR. MASON: No, I want the original  
2 question read back.  
3 MR. CORRELL: This is Kent Correll. I  
4 object. Allow the witness to finish his answer.  
5 MR. MASON: I am not going to let him  
6 just filibuster. Can I have the original question read  
7 back, please?  
8 MR. CORRELL: Why don't we go off the  
9 camera for a moment and let's talk about this and maybe  
10 we should call the judge and ask for some guidance.  
11 MR. MASON: That would be great.  
12 MR. CORRELL: Let's do it.  
13 MR. MASON: Get him on the phone.  
14 THE VIDEOGRAPHER: We're going off the  
15 record. The time is 2:17 p m.  
16 (Break from 2:17 p m. to 2:20 p m.)  
17 THE VIDEOGRAPHER: We're back on the  
18 record. The time on the video is 2:20 p m.  
[REDACTED]

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1 A. And it was discovered that that was out of  
2 compliance with New York state not-for-profit law and it  
3 was one of the things you were going to have to correct.  
4 Q. Did you know that the NRA was running  
5 pass-through expenses through Ackerman McQueen prior  
6 to --  
7 A. No, I didn't.  
8 MR. GARMAN: Hold on. Hold on.  
9 Objection to form.  
10 Go ahead.  
11 A. No, I did not.  
12 Q. (BY MR. MASON) You were not aware of that?  
13 A. No.  
14 MR. GARMAN: Objection to form.  
15 A. No.  
16 Q. (BY MR. MASON) Let's take a look at  
17 Exhibit 152, if we could get that loaded.  
18 (AMc Exhibit 152 marked.)  
19 Q. (BY MR. MASON) Mr. LaPierre, while that's  
20 getting pulled up, did you attend budget meetings with  
21 Ackerman on an annual basis?  
22 A. You know, most of the budget of Ackerman was  
23 put together by -- by the treasurer's office in terms of  
24 building the budget. I remember being in the 2018  
25 meeting with Craig Spray with Ackerman about the budget.  
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1 I -- most of my interaction with Ackerman McQueen wasn't  
2 from a fiscal standpoint. It was from a branding, PR,  
3 crisis management, speeches, me doing all the  
4 television, the strategy on media campaigns, all of that  
5 type of activity. The fiscal relationship with Ackerman  
6 McQueen tended to be managed by the treasurer's office.  
7 Q. If you could take a look at Exhibit 152 and go  
8 down to the second page. Let me know when you're there,  
9 please.  
10 MR. GARMAN: We have page 2 open.  
11 Q. (BY MR. MASON) Do you recall, when you were  
12 having some of your budgeting meetings with Ackerman,  
13 looking at charts such as this one right here?  
14 MR. GARMAN: Objection to form.  
15 Go ahead and answer it.  
16 He's reviewing the document, Counsel.  
17 A. I remember looking at some and involving  
18 particularly NRATV and what the budget would be, and  
19 I -- I don't remember all these specific charts. Like I  
20 remember what First Freedom cost. I remember -- I  
21 remember looking at something like this with Craig Spray  
22 at the meeting I was in with him.  
23 Q. (BY MR. MASON) Okay. If you -- do you see  
24 the second -- the second bucket of categories, Mercury  
25 Group? Do you see that?  
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1 A. Yeah, I do.  
2 Q. And then do you see, the third line down,  
3 pass-through expenses? Do you see that?  
4 A. Yeah, I do see that.  
5 Q. Do you know what -- what those pass-through  
6 expenses were for?  
7 MR. GARMAN: Object to form, object to  
8 foundation.  
9 A. I don't know what they're for. I've never  
10 even focused on that before.  
11 Q. (BY MR. MASON) Do you recall ever asking what  
12 the pass-through expenses were?  
13 MR. GARMAN: Objection to the form,  
14 objection to foundation.  
15 A. I don't. I didn't -- as I said, I did not  
16 spend much time at all building the Ackerman McQueen --  
17 if any, building the Ackerman McQueen budget each year.  
18 I mean, I was focused more on what I just talked about  
19 earlier. I would see the final -- the final figures,  
20 but I don't remember being in a whole number of budget  
21 meetings with Ackerman McQueen as their budget was put  
22 together.  
23 Q. (BY MR. MASON) So I just want to be sure that  
24 the record is clear. It's your testimony, Mr. LaPierre,  
25 that you do not know what the pass-through expenses were  
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1 between Ackerman and the NRA?  
2 MR. GARMAN: Objection to the form.  
3 Go ahead and answer.  
4 A. I don't.  
5 MR. MASON: Let's do this. We can go off  
6 the record and see where we're at with time, and we'll  
7 go from there.  
8 THE VIDEOGRAPHER: We are off the record.  
9 The time on the video is 2:32 p m.  
10 (Break from 2:32 p m. to 2:49 p m.)  
11 THE VIDEOGRAPHER: We are back on the  
12 record. Time on the video is 2:49 p m.  
13 Q. (BY MR. MASON) Mr. LaPierre, you previously  
14 testified that you didn't know anything about the  
15 out-of-pocket expenses or the pass-through expenses, but  
16 how did you -- how did you think that Tyler Schropp's  
17 expenses were being handled with Ackerman McQueen?  
18 MR. GARMAN: Objection to form.  
19 Go ahead and answer.  
20 A. I heard talk somewhere of the fact that to  
21 protect donor secrecy. And I can't even remember when I  
22 heard it. It might have even been when we started the  
23 course correction, safety check stuff, that his expenses  
24 were to protect donor -- donor security under Ackerman  
25 McQueen. I can't remember the time when I heard it, but  
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1 I know I heard it and I knew it was one of the things I  
2 heard that needed to be self-corrected under New York  
3 state's not-for-profit law in terms of the course  
4 correction.  
5 Q. (BY MR. MASON) So prior to January of 2019,  
6 did you know that Tyler Schropp had a credit card that  
7 was in the name of Ackerman?  
8 A. I don't think I did know that.  
9 Q. If we could take a look at Exhibit 70, please.  
10 It should be, hopefully, in the folder.  
11 (AMc Exhibit 70 marked.)  
12 MR. GARMAN: We have it.  
13 Q. (BY MR. MASON) Mr. LaPierre, do you see  
14 Ackerman depo Exhibit No. 70.  
15 A. I am reading it right now.  
16 Yes, I do remember that.  
17 Q. So you've seen -- you've seen Exhibit 70  
18 before?  
19 A. I've seen this letter before, yes.  
20 Q. Did you draft this letter?  
21 MR. CORRELL: Objection to form.  
22 And to the extent that it would require you to  
23 reveal any communications with attorneys, I would  
24 instruct you not to answer.  
25 A. I will take my lawyer's advice.

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1 Q. (BY MR. MASON) So you're not going to answer  
2 the question yes or no whether you drafted this letter?  
3 MR. CORRELL: Again, same instruction.  
4 Q. (BY MR. MASON) Are you going to follow your  
5 counsel's advice?  
6 A. I think it would be the wise thing to do.  
7 Q. Why did you send this letter to Mr. Dycio?  
8 A. Because -- because Mr. Dycio has represented  
9 the NRA and did bill the NRA quite a bit of money over  
10 the years for his services, and all of a sudden he -- he  
11 starts representing a party that by this time had become  
12 adverse to the NRA, and we felt it was not proper.  
13 Q. If you go down in the -- to the first  
14 paragraph, about halfway down, do you see where you  
15 state, The NRA and I have common legal interests in the  
16 litigation against Ackerman McQueen which crystallized  
17 before the September board meeting and colored the  
18 discussion that day?  
19 Do you see that?  
20 A. I do.  
21 Q. What was the litigation against Ackerman  
22 McQueen that you were referring to here?  
23 A. The fact that NRA had sued Ackerman McQueen  
24 to -- for our right under the contract with them to see  
25 their records and that we -- because we had not been

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1 allowed the full disclosure, we felt we had to go to  
2 court and sue for our right to see the records under the  
3 contract.  
4 Q. If I represent to you, Mr. LaPierre, that the  
5 board meeting in September occurred on or about  
6 September 8, 2018, do you have any reason to dispute  
7 that?  
8 A. With the board meeting September 8th, I mean,  
9 it would be the same thing.  
10 As a result of what I just said, Ackerman  
11 McQueen was also involved in what we, I, the NRA,  
12 clearly considered an extortion attempt against me, that  
13 if we didn't -- if we did not -- if I did not resign,  
14 they were going to smear me to the point where I  
15 couldn't walk down the street, and I better withdraw  
16 that lawsuit against them or the smear campaign was  
17 going to take place, and step down and let -- and let  
18 Ollie North get reelected.  
19 And I felt the end result of that extortion  
20 attempt, if I went along with it, would be the ultimate  
21 demise of the NRA, because the whole course correction  
22 would have been thrown off course, the stuff that we  
23 needed to do to be in compliance with New York state  
24 not-for-profit law. I felt the Brewer firm would be  
25 fired, which would -- which would cripple NRA's effort

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1 to self-correct and be in compliance with New York state  
2 law and --  
3 Q. Mr. LaPierre, you've answered my question.  
4 MR. CORRELL: Excuse me, sir. Excuse me,  
5 Mr. Mason. That was a why question, and Mr. LaPierre  
6 had not finished his answer. Please allow him to  
7 finish.  
8 A. Anyway, that's -- that's -- that's pretty much  
9 it. I felt that there was a --  
10 The other thing is Mark Dycio had set in, as  
11 it says in this letter, as the NRA lawyer. And we  
12 identified him as an NRA lawyer when the executive  
13 session started at -- at one of Mr. Brewer's  
14 confidential privileged briefings to the board of  
15 directors. And there were only a few people allowed to  
16 stay in the room to hear Mr. Brewer's confidential  
17 presentation, and one of them was Mr. Mark Dycio, that  
18 was clearly identified by the secretary as allowed to  
19 stay in the room.  
20 Q. (BY MR. MASON) And that was in September of  
21 2018. Right?  
22 A. I think that probably would have been right  
23 when Mr. Dycio sat in the room, yes.  
24 Q. So the litigation against Ackerman  
25 crystallized before the September 2018 board meeting,

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1 according to you. Right?  
2 A. It did -- no, the litigation against Ackerman  
3 crystallized before the either April or May 2019 board  
4 meeting. It was, I think, sometime in March or early  
5 April we brought the litigation.  
6 Q. Then why -- why did you say that the  
7 litigation against Ackerman crystallized before the  
8 September board meeting and colored the discussion that  
9 day?  
10 A. Where -- I'm sorry, you're losing me. I mean,  
11 is it in this letter you're referring to?  
12 Q. We just read it. First paragraph, about  
13 halfway down. The NRA and I have common legal interests  
14 in the litigation against Ackerman McQueen, and then you  
15 state, which crystallized before the September board  
16 meeting and colored the discussion that day.  
17 Do you see that?  
18 A. (Witness reading to himself.)  
19 Well, we were trying to see their records, and  
20 they were not letting us see their records. And, you  
21 know, Mr. Dycio at the September board meeting sat in on  
22 the privileged, confidential briefing from Mr. Brewer as  
23 an NRA attorney.  
24 Q. Did --  
25 A. And part of that was the effort on the part of  
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1 the NRA to look at all the records of all the vendors  
2 and if we needed to self-correct on something.  
3 Q. Was the NRA anticipating litigation against  
4 Ackerman as of that September 2018 board meeting?  
5 MR. GARMAN: So I am going to object to  
6 the form of the question.  
7 And to the extent your answer constitutes  
8 attorney/client communications privilege, I am going to  
9 instruct you not to answer. So, Mr. LaPierre, if the  
10 only basis for your answer is the conversations with  
11 your attorneys, I instruct you not to answer, but  
12 otherwise you can answer.  
13 A. We -- we were going back and forth with the  
14 attorneys on -- we had to see -- we had to have a full  
15 disclosure of Ackerman McQueen's records, and at some  
16 point if they wouldn't do that, NRA would end up having  
17 to sue for it to exercise its right under the contract  
18 to see the records.  
19 Q. (BY MR. MASON) Were you aware that none of  
20 the three audits that the NRA conducted of Ackerman had  
21 occurred as of the September 2018 board meeting?  
22 MR. GARMAN: Objection to the form of the  
23 question.  
24 Go ahead and answer.  
25 A. I know that there was a constant effort on the  
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1 part of the NRA going back to summer of 2018 to take a  
2 full look at the Ackerman McQueen records. And I -- I  
3 just knew that was ongoing, all the way through the rest  
4 of the year.  
5 Q. (BY MR. MASON) And the basis for your  
6 knowledge was -- was based upon communications with  
7 counsel. Do I understand that correctly?  
8 A. That's correct.  
9 Q. And that counsel being the Brewer firm.  
10 Correct?  
11 A. The Brewer firm. And in -- in 2018 even --  
12 even other counsels too, other counsels also.  
13 Q. Before Mr. Brewer was hired in 2018, over the  
14 course of the nearly 40-year relationship between the  
15 NRA and Ackerman, do you recall any instance where  
16 Ackerman denied the NRA access information or  
17 documentation that they had requested?  
18 MR. GARMAN: Objection to form.  
19 Go ahead and answer.  
20 A. I don't know because, as I said, my  
21 relationship with Ackerman was primarily -- was actually  
22 was -- really involved the brand, the marketing, the  
23 advertising, the speeches, being the voice on  
24 television, building the brand, the advertising  
25 campaign, the PR strategy, the television appearances  
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1 and the preparation for that, speeches. I wasn't the  
2 guy that would have been asking to see their records in  
3 relation to anything. That would have been our  
4 treasurer's office. So I wouldn't be aware of -- or  
5 wasn't made aware of any of those types of issues.  
6 Q. (BY MR. MASON) Let's switch gears a little  
7 bit. You have testified that Colonel North had a  
8 conflict of interest when he was attempting to conduct a  
9 review of the Brewer firm's bills because he is an  
10 employee of Ackerman. Do I understand that correctly?  
11 MR. CORRELL: This is Kent Correll.  
12 Objection to form.  
13 A. I -- I -- I consistently was -- the more  
14 Colonel North started to interfere with our attempt to  
15 do this safety check and this course correction and  
16 getting in compliance with New York state not-for-profit  
17 law, it became very clear that Colonel North was -- he  
18 was doing an NRATV show on NRATV network for Ackerman  
19 McQueen for NRA, and that he was adamant and hostile  
20 toward Mr. Brewer, trying to get Mr. Brewer fired  
21 constantly, to the point where I kept telling him you  
22 need to stay out of this. I mean, you have a conflict  
23 of interest. You are -- you work with Ackerman McQueen.  
24 They are our largest vendor.  
25 And I kept informing him over and over and  
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1 over to back off. You know, you're out of your lane. I  
2 mean, we're trying to do the right thing here for the  
3 NRA, and you're trying to derail -- derail all this.  
4 And I even gave him letters telling him he had  
5 a conflict of interest in terms of all of his attacks  
6 on -- on Mr. Brewer. He was upset that Mr. Brewer was  
7 involved in terms of the whole Russia issue, trying to  
8 check out all the facts in regard to that for us so we  
9 would -- we would be able to 100 percent understood  
10 if -- what the story was on all that, if there was any.  
11 On that Russian trip, I remember Ollie in the  
12 room with --  
13 Q. (BY MR. MASON) Mr. LaPierre --  
14 A. I'm sorry. I'm sorry, I'll back off.  
15 Q. Let's take a look at -- let's take a look at  
16 Exhibit 74.  
17 (AMc Exhibit 74 marked.)  
18 Q. (BY MR. MASON) Have you read the deposition  
19 testimony of Colonel North?  
20 A. No, I have not.  
21 Q. Okay. Let's take a look at Exhibit 74. Page  
22 156, please.  
23 MR. GARMAN: 156 of the condensed?  
24 MR. MASON: Yes.  
25 MR. GARMAN: Okay. We have it.  
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1 Q. (BY MR. MASON) If you'll look, Mr. LaPierre,  
2 at line 6, do you see where the question is: When you  
3 were in the process of trying to get information about  
4 Mr. Brewer's engagement letters or Mr. Brewer's invoices  
5 or his billing records, had you ever talked to anybody  
6 at Ackerman McQueen about that? And he says no.  
7 Do you see that?  
8 A. I'm sorry. Where are you?  
9 MR. GARMAN: Counsel, do you mind if I  
10 point out the testimony on the page?  
11 MR. MASON: That's fine.  
12 A. (Witness reading to himself.)  
13 MR. GARMAN: So he asked if you see this  
14 testimony.  
15 A. Yeah, I see that testimony. I don't know it  
16 to be true.  
17 Q. (BY MR. MASON) Okay. Let's go down to line  
18 20 on the same page. Do you see where it says: Well,  
19 let me ask you this. Did anybody at Ackerman McQueen  
20 ever ask you to start looking into Mr. Brewer's invoices  
21 or his engagements or his work for the NRA?  
22 And what does Mr. -- what is Colonel North's  
23 response?  
24 A. He says no, but I don't know that that --  
25 based on what I know with my personal interaction with  
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1 Colonel North, I don't know -- I don't know whether to  
2 believe that or not, because -- I don't know that that's  
3 actually accurate.  
4 Q. Do you think it's important to actually read  
5 what somebody testified to under oath in order to figure  
6 out what actually happened?  
7 MR. GARMAN: Objection to the form of the  
8 question.  
9 A. I do, but I also know what happened in terms  
10 of my involvement with Colonel North. And I know that  
11 starting in -- in late -- in 2018, and really continuing  
12 through early 2019, Colonel North was doing everything  
13 he possibly could to derail Mr. Brewer. Get him fired,  
14 get a phony audit in terms of Mr. Brewer's bills, which  
15 they already -- which they told me they already had the  
16 guy picked who was going to do it, so I -- I knew it was  
17 a setup. And everything he could to derail -- derail  
18 Mr. Brewer, which, in my opinion, if he had succeeded,  
19 would have helped destroy the National Rifle  
20 Association. Because we were doing a heck of a job to  
21 try to get in compliance with New York state  
22 not-for-profit law, and Colonel North was basically  
23 laying down on the railroad track to prevent that  
24 principled path of correction -- self-correction from  
25 succeeding and doing everything he could to derail it.  
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1 Q. (BY MR. MASON) Or he was just trying to  
2 comply with his fiduciary duties as the president of the  
3 NRA. Right?  
4 MR. GARMAN: Objection. That's a bit  
5 argumentative.  
6 A. I don't believe that for a minute, that that's  
7 what he was trying to do. He never understood things  
8 like the Lockton settlement. He -- he was constantly  
9 trying to get me to do things that -- like we told him  
10 he could look at Mr. Brewer's invoices in Mr. Frazer's  
11 office, just not the ones involving his employer, but he  
12 tried to get me to say that that whole Russia trip along  
13 with -- along with Jim Porter and a couple of the rest  
14 of them was an NRA trip, when it wasn't, when I had done  
15 everything I could to stop it, including to get the  
16 president to cancel and all the NRA staff. I told them  
17 they couldn't go and no NRA money could be spent. I  
18 mean, Colonel North was off base on -- on so many issues  
19 that -- and I'll give an example. We were paying for  
20 him to do his television show on NRATV --  
21 Q. (BY MR. MASON) Mr. LaPierre, I appreciate --  
22 you have answered my question.  
23 Let's -- you've mentioned the extortion. Have  
24 you reviewed the sworn testimony of Millie Hallow  
25 relating to the alleged extortion?  
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1 A. No, I haven't. I was there --  
2 Q. Have you reviewed the -- the sworn deposition  
3 testimony of Carolyn Meadows relating to the extortion?  
4 A. No, I haven't.  
5 Q. And Carolyn Meadows is the president of the  
6 NRA right now. Right?  
7 A. That's correct.  
8 Q. And she is somebody that you trust. Right?  
9 A. I trust Carolyn, you're right. I think she's  
10 a good person.  
11 Q. Have you ever reviewed the testimony of former  
12 board member Dan Boren relating to the alleged  
13 extortion?  
14 A. I have not, although I know what Dan Boren  
15 said about the fact he realized why Ackerman McQueen  
16 couldn't let anybody see their records, because they  
17 were charging NRA 100 percent for employees that were  
18 actually working on other accounts.  
19 Q. Have you read Dan Boren's deposition testimony  
20 where he said that that is absolutely not true, what you  
21 just said is absolutely not true?  
22 MR. GARMAN: Objection to the form of the  
23 question. Objection, foundation.  
24 A. Well, I haven't read it, but that's -- that's  
25 what he said at the time.

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1 Q. (BY MR. MASON) Have you read Colonel North's  
2 deposition testimony with respect to the extortion?  
3 A. I have not, but I know what happened.  
4 Q. Don't you think it's important to review the  
5 sworn testimony of all the people that were involved  
6 with the alleged extortion before coming to a conclusion  
7 about it?  
8 MR. GARMAN: Objection to the form of the  
9 question.  
10 A. You know, I lived it. I know what happened.  
11 I know what they did. I mean, I don't -- I don't think  
12 I need -- that's why I didn't read Josh Powell's book.  
13 I don't need to read a lot of fiction. I mean, these  
14 people just make stuff up. I know what happened. I  
15 lived it. I went through it. I was the one that stood  
16 up to it all and took all the heat.  
17 Q. (BY MR. MASON) Just to be clear, nobody --  
18 Dan Boren never called you and made any threats. Right?  
19 MR. GARMAN: Objection to form.  
20 If you understand the question --  
21 A. He did not -- he did not call me.  
22 Q. (BY MR. MASON) And just to be clear, Colonel  
23 North never called you on the phone and made any  
24 threats. Correct?  
25 MR. GARMAN: Objection to form.

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1 A. Colonel North talked on the phone to Carolyn  
2 Meadows and Millie Hallow, and they wrote down what --  
3 what he said. There were notes of what he said that  
4 were relayed to about 35 members of the board of  
5 directors right after it happened.  
6 Q. (BY MR. MASON) And then they testified under  
7 oath about exactly what happened, and you haven't gone  
8 back to read what they said, have you?  
9 MR. GARMAN: Objection to form, asked and  
10 answered.  
11 A. I was in the room when they were going through  
12 their notes with the 20 or 30 other board members.  
13 Q. (BY MR. MASON) You weren't on the phone,  
14 though, were you?  
15 MR. GARMAN: Objection to form, asked and  
16 answered.  
17 A. I wasn't on the phone.  
18 Q. (BY MR. MASON) Let's take a look at Exhibit  
19 65. Now you have previously testified that the -- well,  
20 let's do this. Do you have it up?  
21 MR. GARMAN: It's opening now.  
22 Q. (BY MR. MASON) Mr. LaPierre, you previously  
23 testified that the Dallas house was Angus McQueen's idea  
24 and that when you found out the NRA was going to pay for  
25 it, you killed it. Isn't that true?

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1 A. That's exactly what happened.  
2 Q. Okay. Let's take a look at Exhibit 65.  
3 (AMc Exhibit 65 marked.)  
4 MR. GARMAN: Counsel, is the top of this  
5 redacted? I just want to make sure I --  
6 MR. MASON: It is.  
7 Q. (BY MR. MASON) If you scroll down to the  
8 first page.  
9 MR. GARMAN: We did.  
10 Q. (BY MR. MASON) Have you -- have you seen this  
11 email before, Mr. LaPierre?  
12 A. I know that there was some email traffic  
13 that -- let me look at this one.  
14 MR. GARMAN: So he's asking a specific  
15 question, though, that I want to know the answer to;  
16 have you seen this email?  
17 A. Okay.  
18 Q. (BY MR. MASON) And it was your understanding  
19 that Ackerman was going to buy the Dallas house. Right?  
20 That's what you testified to previously?  
21 A. Here is what the truth is --  
22 Q. Mr. LaPierre --  
23 MR. GARMAN: Answer the question.  
24 Q. (BY MR. MASON) It's a yes or no question.  
25 You previously testified that you understood that

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1 Ackerman McQueen was going to buy the Dallas house.  
2 Isn't that true?  
3 A. My initial understanding was that Ackerman  
4 McQueen had an investment company, they invest in real  
5 estate; that Angus McQueen said, Wayne, nobody can live  
6 like you guys are living, it's going to drive you crazy,  
7 you can't stay on the road all the time. Like the NRA  
8 told me, to get out of town, they can't protect me in my  
9 house.  
10 Angus said here is what I propose. Our  
11 investment company will buy a house. You guys can use  
12 it as a safe house. And he said nobody loses money on  
13 real estate in North Dallas, and by the way, we'll get  
14 our Realtor to come in here -- or you go out and take a  
15 look at some houses and everything.  
16 And, you know, my understanding at that point  
17 is it was going to be an Ackerman McQueen investment  
18 and -- and we could use it as a safe house.  
19 Q. Okay. So on Exhibit 65, this is an email from  
20 Melanie Montgomery to Bill Winkler, and Susan LaPierre  
21 your wife is cc'd on it. Do you see that?  
22 A. I do.  
23 Q. And you know Ms. Montgomery and Mr. Winkler,  
24 don't you?  
25 A. I know both of them.

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1 Q. Okay. And so Ms. Montgomery says, Hi Bill,  
2 Susan, copied here, and I spoke this morning. Following  
3 are my notes from the conversation to assist you in the  
4 offer documents -- in the offer document, excuse me.  
5 Susan also plans to talk with Amy, so it's likely Amy  
6 will have more information.  
7 Do you see that?  
8 MR. GARMAN: Counsel, I am going to  
9 object. I don't think we have foundation for this.  
10 But go ahead and answer.  
11 A. Yeah, I know that we --  
12 MR. GARMAN: Do you see this? He's  
13 asking whether you see this.  
14 A. I do see it.  
15 Q. (BY MR. MASON) Let me ask you this,  
16 Mr. LaPierre. Have you seen Exhibit 65 before?  
17 A. I have.  
18 Q. Okay. So if you'll come down to at the bottom  
19 of page 1, Ms. Montgomery says equipment/furnishings to  
20 retain as part of offer. Do you see that? And then  
21 there's a list of bullet points that flows on to page 2.  
22 MR. GARMAN: So Counsel, a couple of  
23 things. I don't want to make this a speaking objection,  
24 but it looks to me like he's seen this simply because it  
25 was put in front of him at a deposition, which still

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1 leaves me with a foundation objection.  
2 And then, second, we are out of time. I will  
3 let you finish this -- I will let you finish this up,  
4 but those are one comment and one foundation objection.  
5 A. Can I make a comment on this?  
6 Q. (BY MR. MASON) No. I'm trying to get through  
7 my time, Mr. LaPierre.  
8 If you go down to page 2, do you see the  
9 bullet points? Do you see the last bullet point that  
10 says golf cart if possible?  
11 A. Yeah, I do see that.  
12 Q. Was it your understanding that Ackerman was  
13 going to be buying you a golf cart as well?  
14 MR. CORRELL: Objection to the form.  
15 This is Mr. Correll.  
16 A. You know, this whole thing, Angus proposed it.  
17 We were so beaten up, from the threats and everything  
18 else, that we did go look at a bunch of houses. We did  
19 look at this house. I understand some email traffic  
20 went back and forth between my wife and Melanie  
21 Montgomery and the retailer that's a friend of Melanie  
22 Montgomery's. But the bottom line to the whole thing is  
23 when I found out they wanted to use NRA money to buy  
24 this -- this house, I killed it. No one else killed it.  
25 Not the audit committee, not the co-committees, not the

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1 board. I said, no, this is not happening, and I killed  
2 it.  
3 And then my wife, I believe, informed Melanie  
4 Hill that the whole thing was dead. And that's the end  
5 of the story. I killed it. I --  
6 Q. (BY MR. MASON) If you look a little bit  
7 further down the page, it says we need to discuss how to  
8 acquire a social membership to the club. Do you see  
9 that?  
10 A. I do see that.  
11 MR. GARMAN: Again -- again, I'm going to  
12 make a foundation objection.  
13 Q. (BY MR. MASON) Was it your understanding  
14 that -- well, let me ask you this. Did you have any  
15 conversations with Ackerman, either you or your wife  
16 that you're aware of, relating to a social membership to  
17 the club?  
18 A. I didn't. My wife may have. I was out on the  
19 road doing NRA business here and there and there.  
20 And this whole thing was a fantasy. Angus  
21 proposed it. We were so beaten up, we did look at  
22 houses, but when I found out that -- that he wanted to  
23 use NRA money, I said no and I killed it.  
24 So I don't know why this is such a big deal.  
25 It wasn't my idea. It was Angus' idea. It was -- the

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1 whole thing was a fantasy, and when I found out they  
2 wanted to use NRA money, I killed it and nothing ever  
3 happened, and not a penny of NRA money ever ended up  
4 being lost in this --  
5 MR. GARMAN: Brian, did he answer your  
6 question to this one?  
7 MR. MASON: No, but I'll ask a couple  
8 more, and then we'll -- we'll wrap it up.  
9 Q. (BY MR. MASON) Mr. LaPierre, the NRA did send  
10 Ackerman \$70,000 with respect to the house. Right?  
11 A. I understand that at some point Mr. Phillips'  
12 office sent earnest money of \$70,000 that was returned  
13 after I got back from wherever I was and said this whole  
14 thing is not happening and killed the deal.  
15 Q. So you did not tell Mr. Phillips to send that  
16 money to Ackerman?  
17 A. I did not. I think he probably got talked  
18 into that by Ackerman.  
19 Q. At the bottom, it says two vehicles will need  
20 to be purchased prior to move in as well. Do you see  
21 that?  
22 A. Yeah. I don't know anything about that.  
23 Q. Did you -- did you expect that Ackerman was  
24 going to be buying two vehicles as well as the  
25 \$6 million house?

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1 A. I did not -- I did not expect anything. I  
2 didn't write this. The whole thing to me is a fantasy  
3 that never happened, that I didn't propose and I killed  
4 it. And that's the whole story.  
5 And they sure have marketed it to the media,  
6 because the house ended up in the paper and then they  
7 tried to say that I suggested it, which I didn't. And  
8 they tried to say that they killed it, not me. And you  
9 know, the lies just go on and on and on.  
10 MR. GARMAN: So, Brian, I think unless  
11 you've got more on this, we're probably done.  
12 MR. MASON: Yeah, I'm just making sure I  
13 don't have any -- any final couple questions.  
14 All right. Mr. LaPierre, I am going to pass  
15 the witness at this time. I appreciate the time.  
16 THE WITNESS: Thank you. Appreciate it.  
17 MR. DRAKE: Greg, do you guys want to  
18 take five minutes, or what's your preference?  
19 MR. GARMAN: Yeah, Scott. Not to put  
20 words in your mouth, are we talking 30, 45 minutes? Is  
21 that what you're expecting?  
22 MR. DRAKE: That's what I expect. I  
23 would be surprised if it was -- I mean, I expect it to  
24 be under an hour and, hopefully, closer to 30 minutes  
25 than an hour, but --

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1 MR. GARMAN: Do you want a break? We'll  
2 do five. We'll do a short break.  
3 MR. DRAKE: Come back on at half past.  
4 THE VIDEOGRAPHER: We're going off the  
5 record. The time on the video is 3:24 p m.  
6 (Break from 3:24 p m. to 3:34 p m.)  
7 THE VIDEOGRAPHER: We're back on the  
8 record. The time on the video is 3:34 p m.  
9 EXAMINATION  
10 BY MR. DRAKE:  
11 Q. Good afternoon, Mr. LaPierre. My name is  
12 Scott Drake. I'm one of the lawyers that represents the  
13 Official Committee of Unsecured Creditors.  
14 A. Good afternoon.  
15 Q. Without getting into all the specifics, are  
16 you familiar just generally with what the Official  
17 Committee of Unsecured Creditors is in a Chapter 11  
18 case?  
19 A. More or less I am, yes.  
20 Q. Okay. Well, obviously over the past two days  
21 you've been questioned by lawyers for the New York  
22 Attorney General and Ackerman McQueen, and obviously  
23 you're familiar with both of those groups from other  
24 litigation. Right?  
25 A. Yes, I am.

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1 Q. Okay. And I'll just represent to you,  
2 generally the Official Committee of Unsecured Creditors  
3 is a committee of certain creditors of the NRA appointed  
4 by the US Trustee who represent all the unsecured  
5 creditors of the National Rifle Association in these  
6 Chapter 11 cases. So --  
7 A. Okay. I understand.  
8 Q. So Mr. LaPierre, I may try to jump around a  
9 little bit because I'm going to try to be as quick as  
10 possible. I have some follow-up based on some of the  
11 things I've heard over the past two days.  
12 So I want to first focus on the filing of the  
13 bankruptcy. Both Mr. Sheehan and -- asked you about --  
14 Mr. Mason asked you about who all was told about the  
15 filing and at what point. My questions are a little bit  
16 different.  
17 I understand from your testimony that  
18 obviously you personally were involved in the decision  
19 for the NRA to file. Correct?  
20 A. That's correct.  
21 Q. And the members of the SLC, which are  
22 Ms. Meadows, Mr. Cotton, and Mr. Lee, they were involved  
23 in the decision as well?  
24 A. Yes, that's correct.  
25 Q. And I believe you consulted with counsel,

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1 which includes people from the Brewer firm and also the  
2 Neligan firm. Is that right?  
3 A. That is correct.  
4 Q. Was anyone else from the NRA, besides you and  
5 the three members of the SLC, was anyone else at the NRA  
6 involved in the decision to file for Chapter 11?  
7 A. Not in the decision. Andrew Arulanandam knew  
8 about it because he had to be involved with getting --  
9 getting press reaction prepared.  
10 Q. But as far as the people who actually made the  
11 decision, it was just you and the three SLC members  
12 along with advice of counsel?  
13 A. That's correct, based on the authority  
14 delegated to us by the board in their resolution.  
15 Q. I would like to look --  
16 MR. DRAKE: I believe I put, Greg, in the  
17 folder, there's three exhibits, kind of halfway in the  
18 folder below the AMc exhibits. You should see UCC-1, 2  
19 and 3. Do you have guys those?  
20 MR. GARMAN: Refreshing. Hold on.  
21 Yeah, we got them.  
22 MR. DRAKE: Pull up number 1, please.  
23 (UCC Exhibit 1 marked.)  
24 Q. (BY MR. DRAKE) Mr. LaPierre, can you see UCC  
25 Exhibit 1?  
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1 A. Yes, I do.  
2 Q. And do you recognize this as an email that  
3 Mr. Frazer sent out on January 15 of 2021, with a  
4 subject line of announcement from Wayne LaPierre.  
5 A. Yes, I do.  
6 Q. Did -- did you prepare the body of the email  
7 that starts with "Dear Board of Directors"?  
8 MR. GARMAN: Scott, give him one second  
9 to review it.  
10 MR. DRAKE: Sure.  
11 A. No. No, I did not prepare it. It was  
12 prepared by Andrew Arulanandam, who was our director of  
13 public affairs, working with Travis, who works public  
14 affairs with the -- with the Brewer firm.  
15 Q. (BY MR. DRAKE) And as I understand it from  
16 Mr. Frazer, the purpose of this message was to inform  
17 the entire board of directors about the fact that the  
18 NRA had filed for reorganization under Chapter 11 in  
19 Dallas. Is that correct?  
20 MR. GARMAN: I am going to object to  
21 form.  
22 But go ahead and answer.  
23 A. Yes, that is correct.  
24 Q. (BY MR. DRAKE) Did you -- I understand you  
25 had other people prepare it. Did you review it before  
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1 it went out?  
2 A. I did.  
3 Q. And so, Mr. LaPierre, I would just like to ask  
4 about a couple of -- couple of things. If you'll scroll  
5 down to the second page, you will see at the bottom  
6 there's a subheading underlined that says building our  
7 strengths. Do you see that?  
8 A. Yes.  
9 Q. And here you say, I have added Marschall Smith  
10 as our chief restructuring officer. Do you see that?  
11 A. Yes, I do.  
12 Q. And so were you -- or let me strike that.  
13 Who all was involved in the decision to at  
14 this time add or contemplate adding Mr. Smith as the  
15 chief restructuring officer?  
16 A. Well, ultimately I guess I made the decision,  
17 but he was recommended by the -- by the Brewer firm.  
18 Q. Did you consult with any other potential  
19 candidates besides Mr. Smith?  
20 A. I did not.  
21 Q. Did you personally have an understanding as  
22 what a chief restructuring officer does in a bankruptcy?  
23 A. Well, my understanding is he was going to help  
24 in terms of looking at the organization, streamlining  
25 it, looking for cost efficiencies and any way we could  
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1 improve the -- the structure of the organization.  
2 Q. Did you personally believe, Mr. LaPierre, that  
3 it would be beneficial for the NRA to have a chief  
4 restructuring officer look at the type of things that  
5 you just described?  
6 A. If any of them could be improved as we go  
7 through this process, I would be all in favor of it. So  
8 I -- I thought it was a good idea to have someone else  
9 take a look at it.  
10 Q. And looking at the bottom line of page 2  
11 there, did the -- did the things that you envisioned the  
12 CRO might look at include the NRA's compliance efforts?  
13 A. I would hope so. I mean, we would -- we want  
14 everyone to look at that. I mean, it's -- it is a way  
15 of life around this place right now that has been  
16 ingrained in every division. And yes, I would  
17 definitely want him to look at that.  
18 Q. And would you have also wanted Mr. Smith to  
19 look into the NRA's corporate governance?  
20 A. Yeah.  
21 Q. And why -- why did you believe it was worth  
22 having an outside person look at the NRA's corporate  
23 governance in the context of a bankruptcy?  
24 MR. GARMAN: Objection to form.  
25 Go ahead and answer.  
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1 A. Well, I just think -- and I'm kind of winging  
2 it here on that, but if in any way our corporate  
3 governance could be improved, we would -- we would want  
4 him to take a look at it.  
5 Q. (BY MR. DRAKE) And Mr. LaPierre, what's --  
6 what was your understanding of why Mr. Smith ultimately  
7 was not appointed as chief restructuring officer?  
8 A. You know, my understanding is it was kind of  
9 strange, because he was here the day the bankruptcy was  
10 announced and he was sitting in on meetings. And then  
11 all of a sudden about 3:30, he acted sick or a crisis  
12 had come up, and he said -- he said to me, I apologize,  
13 I have some emergency, I have to leave. And he left and  
14 went back home. And then the following week, I find out  
15 that he wasn't going to -- for whatever reason had come  
16 up, he wasn't going to be able to do the job. I assumed  
17 it was some medical issue or something like that.  
18 Q. Would you personally, Mr. LaPierre, still  
19 support having someone serve in such a role to look at  
20 the NRA's compliance and corporate governance through  
21 the bankruptcy process?  
22 MR. GARMAN: Objection to the form of the  
23 question.  
24 A. I wouldn't have any problem with anyone  
25 looking at NRA's structure and corporate governance  
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1 through the restructuring process.  
2 Q. (BY MR. DRAKE) And if the right person were  
3 found, that would include supporting a chief  
4 restructuring officer?  
5 MR. GARMAN: Objection to the form of the  
6 question.  
7 A. Yes. If they could come up with suggestions  
8 that would improve this place, I would be all in favor  
9 of it.  
10 MR. DRAKE: Greg, if you want to pull up  
11 number 2.  
12 (UCC Exhibit 2 marked.)  
13 MR. GARMAN: All right. It's up.  
14 Q. (BY MR. DRAKE) Mr. LaPierre, if you want to  
15 take a second to look at UCC Exhibit 2, I will represent  
16 to you this is something off the NRA Forward website  
17 dated January 15, 2021, that is apparently a letter to  
18 the NRA's vendors. Have you seen this before?  
19 A. Yes, I have. It was put out by -- I'm sorry.  
20 Q. No, go ahead. I was going to ask -- I think  
21 you were anticipating my question. So who put this out?  
22 A. This was put out on our website by Andrew  
23 Arulanandam and Billy, who -- one of our staff people  
24 that works with him. I think they also worked with  
25 Travis in the Brewer team in terms of putting the copy  
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1 together, but it was put out by the two of them.  
2 Everything on the website is done by the two of them.  
3 Q. And you'll see in it looks like the fourth  
4 paragraph, it looks like there's a quote from you.  
5 A. Yes, I see it.  
6 Q. So do you recall whether you reviewed this  
7 letter before it went out to the vendors?  
8 A. You know, I review so many letters. I  
9 probably took a look at this one. I can't remember  
10 specifically whether I saw -- I saw this one.  
11 Q. And as I understand from your testimony over  
12 the past couple days, you -- you personally interact  
13 with many of the NRA's vendors. Is that right?  
14 A. Well, the ones I interact most with are the  
15 ones involved in raising money and in the branding and  
16 the image and the PR crisis management and the -- the  
17 advertising and the -- I mean, all the things that --  
18 that raise money for the NRA and project NRA's image and  
19 keep us in the mainstream of American society, which  
20 allows NRA to prosper and thrive.  
21 Q. And --  
22 A. Those were the vendors.  
23 Q. -- do those vendors play an important role in  
24 allowing the NRA to prosper and thrive?  
25 A. They do. They have.  
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1 Q. And is it important to you, Mr. LaPierre, that  
2 through this bankruptcy the NRA can reorganize in a way  
3 that you can continue -- the NRA can continue to do  
4 business with those vendors going forward?  
5 A. Yes, with some of them.  
6 Q. And Mr. LaPierre, if you'll look at the bottom  
7 of page 1, second to last paragraph, it looks like the  
8 first bold paragraph. It says, as part of the  
9 restructuring, the NRA will propose a plan providing  
10 payment in full of all valid creditors' claims. Do you  
11 see that?  
12 A. That is correct. We wanted --  
13 Q. Go ahead.  
14 A. I'm sorry.  
15 Q. No, go ahead.  
16 A. We wanted to let the vendors know that.  
17 Q. And was that something that was personally  
18 important to you, for the vendors to understand that  
19 they would be paid in full for all valid creditor  
20 claims?  
21 A. That's correct. We thought that was the  
22 proper thing to do, and we wanted to make it clear that  
23 NRA was -- was on solid financial footing and that our  
24 vendors would be paid.  
25 Q. And Mr. LaPierre, that sentence also says that  
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1 the NRA will propose a plan. Are you generally familiar  
2 with the term "plan of reorganization"?

3 A. I am not generally familiar with that term,  
4 no.

5 Q. Okay. Well, do you have any awareness at all  
6 that a debtor in a Chapter 11 proceeding files a  
7 document that's called a plan of reorganization, which  
8 is a legal document under the bankruptcy code which  
9 describes the proposed terms by which the debtor will  
10 reorganize under Chapter 11 and then emerge from  
11 bankruptcy?

12 A. Yes, I know we are -- we are in the process of  
13 beginning to put that together.

14 Q. And I understand from Mr. Frazer that  
15 Mr. Neligan and his law firm is -- is working on a plan  
16 of reorganization for the NRA. Are you personally  
17 involved in -- in the development of the plan of  
18 reorganization?

19 A. I have not been at this point, but I -- I  
20 intend to be.

21 Q. And do you have an understanding as to who  
22 else from the NRA, not its outside advisers but actually  
23 from the NRA, who is involved in the plan process?

24 MR. GARMAN: Objection to form.  
25 Go ahead and answer if you can.

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1 just to sort of refamiliarize yourself. I know you've  
2 looked at a lot of documents. If you go back up to page  
3 5, that's actually the first page. This is the  
4 January 7 resolution authorizing Chapter 11  
5 reorganization and related retention of counsel. Is  
6 that right?

7 MR. GARMAN: This is the resolution we  
8 looked at.

9 A. Okay. Yes.

10 Q. (BY MR. DRAKE) Okay. So now the question I  
11 have is on the next page, which is page 6 of 16. And  
12 you'll see the second paragraph is the resolution that  
13 empowers the NRA and Sea Girt to retain the Neligan  
14 firm. Correct?

15 A. Yes, that's correct.

16 Q. Okay. And so is this what you're talking  
17 about, Mr. LaPierre, that ultimately it was your  
18 decision along with the three members of the SLC?

19 A. Yes.

20 Q. All right. And so the next question I have is  
21 the next paragraph then says resolved that the NRA and  
22 Sea Girt shall retain the firm of Brewer, Associates &  
23 Counselors as special counsel to prosecute and defend  
24 certain non-bankruptcy matters during the course of such  
25 Chapter 11 proceeding, including the pre-petition

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1 A. Well, I think it will be some of our -- our  
2 key valued people that have been around here and we  
3 place a tremendous amount of trust in. Probably Sonya  
4 Rowling, is our chief financial officer. Jason Ouimet.  
5 People like Joe DeBergalis, who that we -- that help run  
6 the association. I think they need to be involved in  
7 it, people like that.

8 Q. (BY MR. DRAKE) Mr. -- Mr. LaPierre, you were  
9 asked some questions by Mr. Mason about the retention of  
10 the Neligan firm, and I believe that you met with them  
11 sometime in Dallas in 2021. Is that right?

12 A. That's correct.

13 Q. Who from the NRA actually made the decision to  
14 engage the Neligan firm?

15 A. The final decision was made -- I made it along  
16 with the special litigation committee, Charles Cotton  
17 and Willes Lee and Carolyn Meadows.

18 MR. CORRELL: Greg, if you could pull up  
19 Exhibit 9, which I think was from the New York AG. Just  
20 Exhibit 9. It's the petition.

21 MR. GARMAN: All right. We have it.

22 MR. DRAKE: If you'll go to page 6 of  
23 that, please.

24 MR. GARMAN: Okay.

25 Q. (BY MR. DRAKE) And Mr. LaPierre, if you want,

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1 matters presently handled by BAC. Do you see that?

2 A. I do.

3 Q. And so do I understand that as of January 7,  
4 you were not intending to engage the Brewer firm for  
5 bankruptcy matters; is that correct?

6 MR. GARMAN: Objection. Counsel, you  
7 referenced January 7. I think this is a January 15  
8 document.

9 MR. CORRELL: Oh, thanks. I apologize.

10 Q. (BY MR. DRAKE) So as of the date of this  
11 resolution, is it true that the NRA did not intend to  
12 engage the Brewer firm for bankruptcy matters?

13 A. Well, we hired -- we -- we executed an  
14 agreement with the Neligan firm and the Garman firm to  
15 help us on bankruptcy matters specifically.

16 Q. Right. And I was going to ask about  
17 Mr. Garman's firm.

18 At the time of this resolution, it was just  
19 the Neligan firm. Correct?

20 A. I believe that's correct.

21 Q. And then later, I believe the NRA realized it  
22 needed additional --

23 A. Yes.

24 Q. -- I'll say manpower or attorney power, and so  
25 Mr. Garman's firm was also brought on to assist the

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1 Neligan firm on bankruptcy matters. Right?  
 2 A. That is correct.  
 3 Q. And so are you aware of any resolutions that  
 4 the NRA adopted that retained the Brewer firm for  
 5 bankruptcy matters?  
 6 A. I am not aware of a resolution that the -- in  
 7 terms of the Brewer firm on bankruptcy matters, although  
 8 the Brewer firm is involved in litigation, all  
 9 litigation matters with us regarding New York state and  
 10 regarding this whole issue in -- the whole issue in  
 11 general.  
 12 Q. Correct. And some of those are referenced in  
 13 the last line of this resolution where it says,  
 14 including the pre-petition matters presently handled by  
 15 BAC?  
 16 A. Yes. Yes. And the Brewer firm continues to  
 17 work with us on those issues.  
 18 Q. So Mr. LaPierre, changing focus, throughout  
 19 the last two days you've referenced things about  
 20 complete compliance or -- I don't remember your exact  
 21 words -- thankfully we have a court reporter -- but sort  
 22 of a self-examination that the NRA did. Were you --  
 23 were you personally involved in some of those efforts to  
 24 do kind of the self-examination and correction efforts  
 25 that the NRA undertook over the past couple of years?  
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1 A. Yes, I was. I was the one that -- that  
 2 started it. I was the one that insisted the NRA go down  
 3 that path. Regardless of who liked it or who didn't  
 4 like it, we were going to go down that path. And we  
 5 were going to look at every employee, every vendor,  
 6 everything NRA was doing. If there was something we  
 7 were doing that was not in compliance, we were going to  
 8 self-correct and become fully compliant with -- well,  
 9 New York not-for-profit law at that point. And I  
 10 personally took the lead from the time we started down  
 11 that path, virtually every day, insisting that that's  
 12 the path we're going down whether you like it or not.  
 13 And if you don't like it, sorry, but this is where we're  
 14 going.  
 15 And that's what we've done. And we never --  
 16 we never let anyone divert us from going down that path,  
 17 which is why, as I said, we were so proud that we --  
 18 where we are today. I mean, we got a totally clean  
 19 audit with -- from a brand new audit firm that knew all  
 20 the issues and everything else in 2019, and we have  
 21 completely turned around the financial picture of the  
 22 NRA in 2020.  
 23 Q. And Mr. LaPierre, what gives you confidence  
 24 that the -- the allegations that were made a few years  
 25 ago have been addressed so that any -- any missteps can  
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1 be avoided going forward in the future?  
 2 A. I think we have -- I think we have done a  
 3 complete self-correction on anything NRA was doing that  
 4 was out of compliance with nonprofit law. We  
 5 self-corrected it.  
 6 I think that if you talk to people in this  
 7 building, compliance is now a way of life for every  
 8 employee. There are -- there are procedures in place so  
 9 controls cannot be overwritten. And I think -- I think  
 10 if anyone interviews any of our financial people that  
 11 are here today, they will -- they will support what I'm  
 12 saying, including the ones that were initially  
 13 whistleblowers that thought things needed to be  
 14 corrected or might be out of -- out of -- out of line.  
 15 Q. Do you -- do you think that the -- the  
 16 compliance efforts and sort of, I guess, public  
 17 reputation of the NRA with respect to compliance with  
 18 nonprofit laws is something that's important to NRA's  
 19 membership?  
 20 A. I do. I think that -- I think it's important  
 21 to the organization. I think it's important to the  
 22 membership. I think that's the type of organization  
 23 that they want to be a member of.  
 24 MR. CORRELL: Greg, could you pull up UCC  
 25 3?  
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1 MR. GARMAN: Yes.  
 2 (UCC Exhibit 3 marked.)  
 3 Q. (BY MR. DRAKE) So Mr. LaPierre, if you look  
 4 at the first page of this document, you'll see it's a  
 5 filing in these Chapter 11 cases. I will represent to  
 6 you that it's something filed by the debtors, which is  
 7 titled at the top of page 2, omnibus opposition to  
 8 Ackerman McQueen -- and I'm paraphrasing -- motion to  
 9 dismiss or in the alternative for a trustee, and also  
 10 the State of New York's motion to dismiss or in the  
 11 alternative a trustee, and also the District of  
 12 Columbia's motion to appoint a Chapter 11 trustee.  
 13 Mr. LaPierre, I just don't know. Do you -- do  
 14 you review legal filings like this on behalf of the NRA  
 15 or do you rely on others at the NRA to do that?  
 16 MR. GARMAN: Scott, this one might be a  
 17 little messy. Would you mind if we have 30 seconds to  
 18 talk about the privilege before you --  
 19 MR. DRAKE: Yeah. No, that's fine.  
 20 MR. GARMAN: I am going to put you on  
 21 mute then, or we can just go off the record.  
 22 THE VIDEOGRAPHER: We are going off the  
 23 record. The time on the video is 4:03 p m.  
 24 (Break from 4:03 p m. to 4:05 p.m.)  
 25 THE VIDEOGRAPHER: We are back on the  
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1 record. The time on the video is 4:05 p.m.  
2 Q. (BY MR. DRAKE) Mr. LaPierre, we're back on  
3 the record after a break for you to consult with  
4 counsel.  
5 MR. DRAKE: Could you read the question  
6 back to him, please, Julie?  
7 THE REPORTER: Yes.  
8 (Requested testimony read.)  
9 A. Yes, I -- I have been in conversation about  
10 this document in terms of counsel describing it to me  
11 what it contained. It was -- this was prepared by  
12 counsel and in discussion also with key NRA employees.  
13 That's how it was put together.  
14 Q. (BY MR. DRAKE) Okay. And Mr. LaPierre,  
15 just -- just so you're clear -- and I think after  
16 getting towards the end of day two, you probably have an  
17 understanding. Like Mr. Sheehan and Mr. Mason, I am not  
18 trying to get into your conversations with the NRA's  
19 lawyers or your personal counsel. So I'm sure they'll  
20 caution you if they think the question calls for it, but  
21 just so you know, I don't want to know about those  
22 communications.  
23 But do you understand -- again, I know you're  
24 not a lawyer, but you understand that certain parties,  
25 including Ackerman McQueen and the State of New York and  
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1 the District of Columbia, have moved either to dismiss  
2 the bankruptcy entirely or for the appointment of what's  
3 called a Chapter 11 trustee. Do you understand that  
4 generally?  
5 A. Yes, I do.  
6 Q. I would like to ask you about a couple of  
7 statements in here. If you'll go to page 13 of 54. Do  
8 you see, Mr. LaPierre, in the middle there's a heading,  
9 Roman numeral II, jurisdiction?  
10 MR. GARMAN: I'm sorry. Scott, are  
11 you -- oh, yeah, yeah. We're on it.  
12 MR. DRAKE: Okay.  
13 Q. (BY MR. DRAKE) So Mr. LaPierre, if you see  
14 right above that heading jurisdiction, the paragraph  
15 above it starts with a sentence that says the facts are  
16 that the NRA, acting in the wake of Mr. Schneiderman's  
17 warning -- and then it continues on. Do you see that  
18 paragraph?  
19 A. Yes. Yes, I do.  
20 Q. Okay. And Mr. LaPierre, you've testified I  
21 think multiple times over the past two days about  
22 Mr. Schneiderman's call to you.  
23 A. Actually it was Mr. Tom King on our board of  
24 directors.  
25 Q. Okay. I apologize. Is that reference here  
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1 Mr. Schneiderman's warning, that's referring to what  
2 you've testified to about the past two days?  
3 A. That's correct.  
4 Q. And I believe -- again, I'll paraphrase, but  
5 in your words, led to the NRA deciding to take a look at  
6 its own governance. Is that generally what you've been  
7 referring to?  
8 A. Yes. That's what Attorney General  
9 Schneiderman advised us to do. He, as I said -- and  
10 I'll keep it short. He said there was a plan that had  
11 been cooked up by some of the anti-NRA NGOs and they  
12 were -- to improperly use the government of New York  
13 state to target the NRA and attack us, and he thought it  
14 was an improper use of government. He said but they're  
15 going to do it. And he said there's tremendous pressure  
16 to do it. And he went on to say that -- although he  
17 disagreed with the NRA on the Second Amendment issues  
18 altogether, he just thought it was an improper use of  
19 government. And he said, but I think it's going to  
20 happen, and you would be wise -- New York state law, a  
21 lot of it's been changed in recent years. He said  
22 there's a lot of people out of compliance, probably no  
23 one is in full compliance, but that doesn't matter  
24 because they're going to target you guys, so you really  
25 ought to take a full look at the entire organization and  
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1 make sure you're in complete compliance with New York  
2 state not-for-profit law, because there's a safe harbor  
3 provision, if you do that and you self-correct, your  
4 organization will be in good shape.  
5 That made perfect sense to me. And from that  
6 moment forward, I decided that's the course we're going  
7 to go down, whether people like it or not, and there is  
8 nothing that is going to stop us from going down that  
9 course.  
10 MR. GRUBER: This is Mike Gruber.  
11 Objection to form for every -- all the hearsay. Thank  
12 you.  
13 MR. DRAKE: Just so I'm clear, Mike, are  
14 you talking about my question or his answer?  
15 MR. GRUBER: I'm talking about his answer  
16 was --  
17 MR. DRAKE: Okay.  
18 MR. GRUBER: -- nothing but three minutes  
19 of hearsay. Thank you.  
20 MR. DRAKE: Okay. I just -- I didn't  
21 know.  
22 Q. (BY MR. DRAKE) Mr. LaPierre, do you see the  
23 third line of that paragraph? It says took steps to  
24 redress or obviate nearly every item the NYAG cites in  
25 its dissolution lawsuit. Do you see that?  
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1 A. I do.  
2 Q. In your personal opinion, do you think the NRA  
3 has, in fact, taken steps to redress or obviate nearly  
4 every item in the New York AG lawsuit?  
5 A. I do. I think we have -- we have  
6 self-corrected, and we continue to -- if anyone -- we  
7 encourage people to step forward if they see anything  
8 else. But, yes, I believe we have taken every step  
9 possible to -- to self-correct and to bring NRA into  
10 full compliance.  
11 Q. Do you have any concerns, sir, that -- that  
12 many of the people who were in management positions at  
13 the NRA at the time prior to the New York AG lawsuit,  
14 that the allegations or concern are still in management  
15 positions at the NRA today?  
16 MR. GARMAN: Objection to form.  
17 Go ahead and answer.  
18 Q. (BY MR. DRAKE) Does that give you any  
19 concern?  
20 A. I think the people that are -- we talked about  
21 some of them. I think that the people here that are in  
22 management positions are doing a good job and they're --  
23 they're doing a very good job, and I think you see that  
24 in the performance of the organization over the last  
25 year and a half.

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1 Q. Mr. LaPierre, if you could turn to page 24 of  
2 54.  
3 MR. GARMAN: Okay. We're on page 24.  
4 Q. (BY MR. DRAKE) Do you see paragraph b?  
5 A. Yes, I do.  
6 Q. So you can either -- I can read it, or if you  
7 want to just take a minute to read it, read the few  
8 sentences.  
9 A. Yeah. Okay. Yeah, I'll read it right now.  
10 Yes, I've read paragraph b.  
11 Q. Okay. Do you agree, Mr. LaPierre, with the  
12 last part of that, that the NRA would benefit from  
13 modernization to ensure its continued existence as a  
14 going concern for the benefit of the NRA's creditors and  
15 members?  
16 A. Well, the NRA certainly can benefit from a --  
17 from a look at any way we can be more efficient and  
18 we can -- all of that. I think -- the one issue I would  
19 take -- this is a subject of debate and we'll probably  
20 debate it as we get into this reorganization plan -- is  
21 when you talk about the charter and the -- and the board  
22 in particular.  
23 I -- I think one of the strengths of the  
24 NRA -- some people think it's a weakness -- is the fact  
25 that we have 76 board members. A third of them run for

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1 election every year, and they report -- they answer  
2 directly to the members, and they have to run for  
3 election. I think that gives us a pretty independent  
4 board that expresses the will of the membership, which  
5 is ultimately what makes this organization successful.  
6 So I -- I know it's the subject of debate, but  
7 I know there are a lot of people that think, well, the  
8 NRA board ought to be 15 or 20 people rather than as  
9 large as it is. I kind of believe the size of the board  
10 is a strength of the organization, because the strength  
11 of the organization is ultimately based on the  
12 membership and the board representing that membership.  
13 Q. And Mr. LaPierre, I have another question  
14 about the membership. If you'll scroll down to page 47,  
15 specifically page -- excuse me -- paragraph 83. If  
16 you'll read that paragraph 83 and let me know when  
17 you've had a chance to read it, please.  
18 A. I've read it.  
19 Q. Do you agree, Mr. LaPierre, with this second  
20 sentence that says the removal of the members' selected  
21 leadership and the installation of a third-party trustee  
22 appointed by the government will have a devastating  
23 impact on the NRA's ability to collect dues and raise  
24 donations from its members? Do you agree with that?  
25 MR. THOMPSON: This is Stephen Thompson.

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1 Objection to form.  
2 A. I actually do agree with that. It -- it's one  
3 of my biggest concerns, we talked about a little bit  
4 earlier, in terms of succession. As I get toward  
5 retirement, the fact that -- the fact that I have been  
6 the voice of the NRA literally for 40 years out in front  
7 of the membership, my signature raises hundreds of  
8 millions of dollars for the organization. It has  
9 actually raised billions of dollars for the  
10 organization, based on the fact that they've seen me out  
11 there fighting and they've -- for what they believe in  
12 and for their constitutional rights, and therefore, they  
13 are responsive based on -- based on -- based on the  
14 relationship that I formed with them, based on that  
15 they -- well, I've been with them probably 35, 40 years  
16 on the road with them also.  
17 So if you were to put a trustee, or someone to  
18 put a trustee over this organization, you're going to  
19 massively crash the amount of revenue coming into this  
20 organization and which will have a devastating impact on  
21 it. I mean, one of the reasons -- one of the ways we  
22 were so successful last year in reducing our debt by 40  
23 million and the NRA -- including accounting and paying  
24 off the loans, and NRA ran 33 million in the black, was  
25 that even with COVID we came within 7 percent of our

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1 preCOVID budget projection on revenue. And that was  
2 phenomenal, given the COVID year and if you look at what  
3 happened to other nonprofits.  
4 And one of the ways we did that was to trust  
5 that the membership placed -- places -- placed in the  
6 relationship. And I'm not saying -- heck, everybody is  
7 dispensable. I mean, I am not trying to build myself up  
8 or anything else, but part of that is the relationship  
9 over 40 years that I built with those members and the --  
10 and then the ability to turn that into dollars, whether  
11 it's email, direct mail or -- or digital communication  
12 with them. A trustee would be horrible for the future  
13 of the National Rifle Association in terms of  
14 fundraising.  
15 Q. (BY MR. DRAKE) Mr. LaPierre, with respect to  
16 your views on the board and the 76 member board and the  
17 fact that, you know, a third of the board sits for  
18 election every year, how are the board candidates placed  
19 up for nomination?  
20 A. They -- there's two ways. There is a  
21 nominating committee of the board of directors that  
22 nominates so many candidates each year. They usually  
23 nominate -- I think 25 are elected. They usually  
24 nominate somewhere between -- let's say 26 and 32 or 33  
25 qualified candidates after looking at all the petitions  
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1 that come in and recommendations. And then someone can  
2 also run for the board of directors by gathering a  
3 certain amount of petition signatures and so they -- and  
4 be placed on the election ballot independently of the  
5 nominating committee.  
6 Q. How many people sit on the nominating  
7 committee, if you know?  
8 A. It's elected by our board of directors every  
9 year, and it's usually -- I think it requires six board  
10 members and three nonboard members to be on it, I  
11 believe.  
12 Q. And each of those members is elected by --  
13 actually by the board?  
14 A. That's correct. It's elected by the board of  
15 directors.  
16 MR. DRAKE: Mr. LaPierre, I appreciate  
17 your time, and at this time I'll pass the witness.  
18 THE WITNESS: Thank you. I appreciate  
19 it.  
20 MR. GARMAN: Well, hearing no one come  
21 forward, does this -- does this conclude the deposition  
22 by the notice -- by the parties who noticed today?  
23 MR. THOMPSON: Mr. Garman, this is  
24 Stephen Thompson just to confirm that we do still have  
25 some 30(b)(6) questions for Mr. LaPierre, but the New  
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1 York Attorney General is done with questioning for  
2 Mr. LaPierre in his individual capacity.  
3 MR. GARMAN: Brian, just confirming? I  
4 think it's a formality. We're out of time, but --  
5 MR. MASON: Yeah, that's fine. We have  
6 some 30(b)(6) time, so --  
7 MR. GARMAN: Yeah. Okay. Do you guys  
8 have an estimate of how long you -- I'm not going to  
9 hold you to it. I think you've got two hours and  
10 one minute, by my calculation, left of 30(b)(6) time.  
11 Do you guys have an estimate of how long you're going to  
12 go?  
13 MR. THOMPSON: Yeah, Greg, this is  
14 Stephen. I'm estimating about a half hour for my  
15 questions.  
16 MR. MASON: And I -- I probably will not  
17 be more than that as well.  
18 MR. GARMAN: Okay. Let's take a break  
19 then. It sounds like we could have up to an hour. And  
20 what do we say? Let's take 15 minutes.  
21 MR. THOMPSON: Thank you.  
22 THE VIDEOGRAPHER: We are going off the  
23 record. The time on the video is 4:23 p m.  
24 (Break from 4:23 p m. to 4:43 p m.)  
25 THE VIDEOGRAPHER: We're back on the  
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1 record. The time on the video is 4:43 p m.  
2 EXAMINATION  
3 BY MR. THOMPSON:  
4 Q. All right. Good afternoon, Mr. LaPierre.  
5 A. Good afternoon.  
6 Q. My name is Stephen Thompson. I am an  
7 assistant attorney general in the New York State Office  
8 of the Attorney General. So we are switching gears. I  
9 will now be asking you some questions in your capacity  
10 as a corporate representative for the NRA for the  
11 30(b)(6) deposition.  
12 A. Okay.  
13 Q. So if -- there should be a new exhibit,  
14 Exhibit 11, in the shared folder. If you could please  
15 let me know when you have that.  
16 (Exhibit 11 marked.)  
17 MR. GARMAN: I'm pulling it up now. One  
18 second, Stephen. All right. It's up.  
19 Q. (BY MR. THOMPSON) So Mr. LaPierre, if you  
20 would please scroll down to page 7 of 8 in this PDF --  
21 oh, I'm sorry. Actually, to -- to the last page.  
22 A. Okay.  
23 Q. So if you could please take a moment to read  
24 topics 12, 13 and 14. And just let me know if I am  
25 correct that you are prepared to act as a corporate  
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1 representative for the NRA with respect to these three  
2 topics.  
3 A. Yes. Yes, I am.  
4 Q. Okay. Great. And can you tell me what you  
5 did to prepare for your 30(b)(6) deposition?  
6 A. I talked with our counselor here, Greg Garman,  
7 and I also talked with -- we talked with Andrew  
8 Arulanandam, our public relations director at the  
9 National Rifle Association. And my attorney sat in on  
10 it, but the preparation was actually done with  
11 discussion between Mr. Garman and Mr. Arulanandam and  
12 myself.  
13 Q. Okay. And other than Mr. Garman and  
14 Mr. Arulanandam and I believe you said -- was that Kent  
15 Correll, your individual lawyer was there for at least  
16 part of it?  
17 A. He sat in on it, but didn't -- didn't say  
18 anything.  
19 Q. Okay. Other than -- other than those folks,  
20 did you speak with anyone else in preparation for your  
21 30(b)(6)?  
22 A. I did not.  
23 Q. And did you review any documents in  
24 preparation for your 30(b)(6)?  
25 A. I did not.

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1 guess.  
2 A. I don't know.  
3 Q. (BY MR. THOMPSON) Okay. And I believe that  
4 you said that the special litigation committee was  
5 involved. Were all three members of the special  
6 litigation committee involved?  
7 A. Yes, they all were involved. They all were  
8 aware of what we were doing.  
9 Q. Okay. And then the -- the, sort of,  
10 incorporation documents were ultimately filed by the  
11 NRA's chief of staff Vanessa Shahidi. Is that correct?  
12 A. That's correct.  
13 Q. Okay.  
14 A. That's correct.  
15 Q. So turning now to topic 13, there should be a  
16 new exhibit, Exhibit No. 12, in the share folder. If  
17 you could please let me know when you have that.  
18 (Exhibit 12 marked.)  
19 MR. GARMAN: Okay. We have Exhibit 12.  
20 Q. (BY MR. THOMPSON) Mr. LaPierre, do you  
21 recognize this document?  
22 A. It's the minutes of a board of directors  
23 meeting.  
24 Q. Okay. And let me scroll down and give you a  
25 PDF page number here.

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1 MR. GARMAN: Counsel, just to be clear, I  
2 put the notices in front of him, but that's all.  
3 MR. THOMPSON: Okay. Thank you.  
4 Q. (BY MR. THOMPSON) So I am going to --  
5 A. These topics, yeah.  
6 Q. All right. So I am --  
7 A. I'm sorry. The notice, yes, these topics were  
8 put in front of me.  
9 Q. Right. Okay. Thank you.  
10 So starting first with topic 12, which was  
11 related to Sea Girt, can you tell me who at the NRA was  
12 involved in the formation of Sea Girt?  
13 A. I was involved in it and the special  
14 litigation committee, which is Carolyn Meadows, Charles  
15 Cotton and Willes Lee. And we worked with counsel on it  
16 in terms of -- in terms of setting it up and filing.  
17 Q. And can you tell me, without providing me the  
18 substance of any of your communications, which counsel  
19 were involved?  
20 A. The Brewer firm.  
21 Q. Was the Neligan firm involved?  
22 A. The Brewer firm was involved. I don't -- I  
23 know the Brewer firm was involved. The Neligan firm --  
24 this goes back to November.  
25 MR. GARMAN: If you don't know, don't

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1 A. Thank you.  
2 Q. If you could please scroll down to PDF page 7,  
3 which is page 5 of the minutes. And if you see towards  
4 the -- halfway down the page, it starts, The chair  
5 called for if new business. Mr. Frazer stated that he  
6 had received one resolution, as follows.  
7 Do you see that?  
8 A. Yes, I do.  
9 Q. And is the resolution that follows the  
10 resolution that formalized the delegation of corporate  
11 authority by the NRA board of directors to the special  
12 litigation committee?  
13 A. That's correct. The board of directors needed  
14 to -- in order for the special litigation committee to  
15 represent the board as a whole, the board needed to  
16 officially bless the creation of the special litigation  
17 committee where they would have the authority of the  
18 board behind them.  
19 Q. At the time of this -- this meeting of the  
20 board on January 7th, did the board of directors have  
21 any vacancies?  
22 A. I'm not sure whether they did or not. I  
23 don't -- my answer is I doubt it because what happens is  
24 if someone drops off, the next person in line moves up  
25 and fills that spot. And there are usually three or

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1 four or five people in line, where if someone were to  
2 have a health problem or something and drop off, the  
3 next person would move up.  
4 Q. Got it.  
5 A. So I don't think there was a vacancy.  
6 Q. And that is what happened after Mr. Liptak  
7 resigned. Is that correct?  
8 A. That is correct.  
9 Q. Okay. So turning to the -- what is the page 6  
10 of the minutes, page 8 of the PDF, still staying within  
11 this resolution -- well, before I get to this, can you  
12 tell me what role does the special litigation committee  
13 have with respect to this bankruptcy?  
14 MR. GARMAN: Objection to the form of the  
15 question.  
16 Go ahead and answer, if you can.  
17 A. I have been consulting them all the way  
18 through on this because they also represent the three  
19 officers of the National Rifle Association. And so they  
20 are -- they have been a co-partner with the EVP's office  
21 in -- in this process.  
22 Q. (BY MR. THOMPSON) Does the special litigation  
23 committee have the authority to direct you with respect  
24 to -- direct you as executive vice president with  
25 respect to the bankruptcy?  
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1 MR. GARMAN: Objection to the form of the  
2 question.  
3 Go ahead and answer if you can.  
4 MR. CORRELL: Yeah, and if I could just  
5 get the same agreement on objections, that I will be  
6 joining them without having to say it separately. Is  
7 that acceptable to you?  
8 MR. THOMPSON: Yes. Thank you,  
9 Mr. Correll.  
10 A. I am not trying to be evasive. That's a legal  
11 question that I am not sure I know the answer to, to  
12 tell you the truth. I've done this as a partner with  
13 them all the way through it, and I -- that would be a  
14 legal opinion that I -- I don't know the answer to in  
15 terms of direct.  
16 Q. (BY MR. THOMPSON) Okay. Is it fair to say  
17 that the special litigation committee has the authority  
18 to supervise the bankruptcy?  
19 MR. CORRELL: Again, Mr. Correll. I am  
20 objecting as to form, calls for legal conclusion.  
21 A. Yeah, that -- I'm not a lawyer. I'm not  
22 trying to be evasive. I just don't know whether they  
23 have the authority to supervise the bankruptcy or not.  
24 I just know that everything I've been doing in my spot  
25 as EVP I've been doing in complete coordination with the  
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1 special litigation committee, which, as I said, are the  
2 three officers of the board.  
3 Q. (BY MR. THOMPSON) Okay. Is it the NRA's  
4 position that this bankruptcy is an additional legal  
5 proceeding arising from the same facts, circumstances or  
6 allegations as sub Roman i, ii and iii in the resolution  
7 on page 6 of this Exhibit 11 -- or 12? I'm sorry.  
8 MR. GARMAN: Objection to the form of the  
9 question. I object that I believe it's outside the  
10 scope of the 30(b)(6) witness.  
11 But answer if you can.  
12 A. I'm sorry, could -- it's kind of the end of  
13 the day. Could you repeat the question, please?  
14 Q. (BY MR. THOMPSON) Sure.  
15 Is it the NRA's position that this bankruptcy  
16 is -- falls within the scope of sub Roman iv of this  
17 resolution?  
18 MR. GARMAN: I incorporate the same  
19 objection.  
20 Answer to the extent you can.  
21 A. Well, this flows out of the fact that NRA came  
22 to believe that the New York state was not a fair  
23 playing field for the organization in terms of it to  
24 operate. And the organization looked for a vehicle to  
25 facilitate a possible transition. Sea Girt was formed.  
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1 And -- and with the approval of a federal judge after we  
2 file Chapter 11, we could hopefully find a home for the  
3 NRA with a fairer playing field from a -- well, let's  
4 just say a fairer playing field for the organization to  
5 grow and prosper in. So it -- I mean, as I said  
6 earlier, we have been looking, talking for quite a while  
7 about, even before any of this came up about finding  
8 another home for the NRA out of New York state or even  
9 finding another home for our main facility here where  
10 most of our employees are, a more favorable area to  
11 operate out of, and it was the outgrowth of all of that.  
12 Q. (BY MR. THOMPSON) So just because I want to  
13 make sure that I have -- to go back to my question, my  
14 question is whether the NRA believes that this  
15 bankruptcy falls within the scope of sub Roman iv of  
16 this resolution?  
17 MR. GARMAN: Hold on. Objection to form.  
18 Objection, I believe it falls outside the scope of  
19 question 13.  
20 Answer to the extent you can under romanette  
21 iv.  
22 MR. CORRELL: And this is Mr. Correll. I  
23 object to the form to the extent that it calls for a  
24 legal conclusion.  
25 A. It's really a legal question you're asking me  
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1 that I -- I'm not sure of what the answer is, to tell  
2 you the honest truth. I mean --  
3 Q. (BY MR. THOMPSON) So if there were to be a  
4 disagreement between you as the executive vice president  
5 and the special litigation committee about any decisions  
6 that need to be made with respect to the bankruptcy, who  
7 would have the ultimate authority to make the decision  
8 between you as executive vice president and the special  
9 litigation committee?  
10 MR. GARMAN: Objection to the form of the  
11 question, and objection it falls outside the scope of  
12 question 13.  
13 Answer if you can.  
14 A. Well, I -- I think if we -- if we -- if a  
15 disagreement of that type occurred between the EVP and  
16 the special litigation committee, I think we would -- we  
17 would seek further input from the board of directors, to  
18 tell you the truth.  
19 Q. (BY MR. THOMPSON) Okay. Is it the NRA's  
20 position that prior to -- let me step back for a second.  
21 Is it the NRA's position that prior to the  
22 resolution adopting your employment agreement that was  
23 adopted at the January 7th meeting, did you as the  
24 executive vice president have the authority to file a  
25 Chapter 11 bankruptcy petition on behalf of the National  
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1 Rifle Association?  
2 MR. GARMAN: Objection to the form of the  
3 question. It calls for a legal conclusion, and it falls  
4 outside the scope of the designated questions.  
5 Go ahead and answer.  
6 A. Yeah, as I -- I -- I would not have proceeded  
7 in terms of the executive vice president position to  
8 move ahead with filing without that resolution from that  
9 board of directors delegating authority to the EVP's  
10 office to reorganize. Without that, I would not have  
11 proceeded.  
12 Q. (BY MR. THOMPSON) Okay. So let's go ahead  
13 and turn to topic 14. So I believe during your  
14 individual deposition you testified that the contents of  
15 the NRA Forward website were prepared by Mr. Arulanandam  
16 and his team with some input from Mr. Carter at the  
17 Brewer firm. Is that correct?  
18 A. That is correct.  
19 Q. Okay. Sitting here today, does the NRA have  
20 any reason to believe that any statements on the NRA  
21 Forward website are inaccurate?  
22 A. I don't think we have any reason to believe  
23 that. Not that I know of.  
24 Q. Okay. So I want to -- give me a moment to  
25 actually mark it, but I am going to mark Exhibit 13, I  
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1 believe.  
2 (Exhibit 13 marked.)  
3 Q. (BY MR. THOMPSON) Okay. The exhibit should  
4 be available if you refresh.  
5 A. It's here now.  
6 MR. GARMAN: All right. We're looking at  
7 page 1, questions and answers.  
8 MR. THOMPSON: Yes.  
9 Q. (BY MR. THOMPSON) Mr. LaPierre, do you  
10 recognize -- I apologize for the formatting of this  
11 document, but are you able to tell what it is?  
12 A. Yes. This is a question and answer document  
13 that was prepared by our public -- public relations  
14 staff in consultation with Travis with the Brewer firm.  
15 Q. Great. So if you could please go down to the  
16 bottom of the second page under the question, By filing  
17 for Chapter 11, is the NRA admitting it mismanaged donor  
18 funds? Do you see that question?  
19 A. I do see that question.  
20 Q. Okay. And then right underneath that question  
21 do you see where it says: Not at all. We have utilized  
22 all donor contributions in furtherance of the NRA's  
23 mission. This action is necessitated primarily by one  
24 thing, the unhinged and political attack against the NRA  
25 by the New York Attorney General.  
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1 Do you see that?  
2 A. I do see that.  
3 Q. Does the NRA agree with this statement?  
4 A. Well, as I said earlier, it -- not to be  
5 repetitive, but going back to general -- Attorney  
6 General Schneiderman and we believe -- we became  
7 convinced that -- I became convinced in my deposition  
8 the first time that -- where there seemed to be no  
9 interest in the self-correction, tremendous pain the NRA  
10 was going through to self-correct and look at everyone  
11 and to be in complete compliance with New York state  
12 law, which we were proud of.  
13 And then when the -- General James filed for  
14 dissolution of the NRA, this 5 million member  
15 organization that does all these great safety and  
16 training and education and programs, as well as  
17 political advocacy, that the atmosphere in New York --  
18 there didn't seem to be any good faith effort in terms  
19 of all the work NRA had done on compliance, to even  
20 recognize any of that and as -- or the safe harbor  
21 provision that Attorney General Schneiderman had talked  
22 about, that we honestly felt that we had -- in terms if  
23 you cared about the NRA and its programs and its mission  
24 and our members, our -- it gotten to the point where our  
25 one alternative was to file Chapter 11 and seek a  
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1 federal judge's approval on reincorporating in another  
2 state.  
3 We had tried -- and I will be quick. But  
4 through 2017, after the Schneiderman call, in 2018, in  
5 2019, not to leave New York, but to actually look at  
6 everything, self-correct and -- and ensure that we were  
7 in complete compliance with New York state law, but it  
8 just got to the point where, based on what happened, if  
9 you cared about the NRA we felt we had no other  
10 alternative but to take this course.  
11 Q. Okay. And I appreciate the context,  
12 Mr. LaPierre, but I just want to go back to my question.  
13 A. I'm sorry.  
14 Q. So my question is whether the NRA agrees with  
15 this statement at the bottom of page 2 of Exhibit 13?  
16 A. Yes, we do -- I do -- we do agree with it.  
17 Q. Okay. Thank you.  
18 MR. THOMPSON: Mr. Garman, if we just  
19 take a two-minute break, that may be the end of my  
20 30(b)(6) questioning, but I just want to have a moment  
21 to confer with my colleagues.  
22 MR. GARMAN: Sure. Take whatever time  
23 you need. We'll go off the record.  
24 MR. THOMPSON: Okay. Thank you.  
25 THE VIDEOGRAPHER: We're going off the  
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1 record. The time on the video is 5:09 p m.  
2 (Break from 5:09 p m. to 5:12 p m.)  
3 THE VIDEOGRAPHER: We are back on the  
4 record. The time on the video is 5:12 p m.  
5 Q. (BY MR. THOMPSON) So Mr. LaPierre, just one  
6 last question from me relating to topic 13, the process  
7 by which the NRA determined to file for bankruptcy.  
8 During your individual deposition, you mentioned that  
9 there were some conversations that were occurring with  
10 leaders in other states, or I believe you specifically  
11 mentioned the governor of Texas about a potential move  
12 for the NRA. Were there conversations with any other  
13 states about a potential move?  
14 MR. GARMAN: So objection to the form of  
15 the question. Objection to the extent this falls  
16 outside of question 13.  
17 Go ahead and answer if you can.  
18 A. Yes, there were -- there were conversations  
19 with -- I know for a fact Arkansas, West Virginia,  
20 definitely Texas. I am trying to think, because we've  
21 been contacted by -- those are the three that I am  
22 specifically aware of, although I know there were many  
23 others that also have expressed interest. I just -- I  
24 just don't want to misstate the states by -- but I know,  
25 for example, the governor of West Virginia called me  
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1 personally.  
2 Q. (BY MR. THOMPSON) Okay. And that was my  
3 follow-up question, was without -- without itemizing for  
4 me who was involved in each particular conversation, can  
5 you tell me generally who at the NRA who isn't a lawyer  
6 representing the NRA was involved in those  
7 conversations?  
8 MR. GARMAN: I object to the extent this  
9 calls outside of question 13.  
10 Go ahead and answer if you can.  
11 A. Charles Cotton talked with the governor of  
12 Texas directly. Randy Kozuch on our staff had  
13 conversations with -- I know he had conversations with  
14 the attorney general of Arizona. I think he also had  
15 conversations with the governor of Arkansas. I may have  
16 said Arizona. Arkansas. I believe the governor of  
17 Arkansas also mentioned it to me personally in -- when I  
18 was talking with him. Ah --  
19 Q. (BY MR. THOMPSON) I'm sorry. Go ahead.  
20 A. No, I'm just trying to recall any -- I'm  
21 thinking through the -- the governor of Tennessee  
22 expressed an interest in setting up a meeting to talk  
23 about it. Those are the ones that specifically come to  
24 mind.  
25 Q. Who is Mr. Kozuch?  
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1 A. Randy Kozuch works for NRA in the Office of  
2 Advancement, but he is -- he is very close to most of  
3 the governors and probably most of the attorney generals  
4 in the country.  
5 Q. And does he -- he works under Mr. Schropp. Is  
6 that correct?  
7 A. That is correct.  
8 Q. And other than Mr. Cotton, prior to the filing  
9 of the bankruptcy on January 15, were any members of the  
10 board informed about any of the conversations that we  
11 were discussing with Arkansas, West Virginia, Texas or  
12 Tennessee?  
13 MR. GARMAN: Objection to the extent this  
14 question falls outside the scope of the identified  
15 questions.  
16 Go ahead and answer if you can.  
17 A. I don't -- I don't think any of them from our  
18 end were informed or -- I know you had a lot of  
19 discussion going on among our board about the NRA ought  
20 to move to Texas, the NRA ought to move to North -- to  
21 South Dakota, the NRA ought to move to, you know  
22 Kentucky, Tennessee. I mean, everyone seemed to have an  
23 opinion, and that was kind of a free-flowing discussion  
24 going on just in general, not specifically related to  
25 this, but it was just conversational talk going on among  
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1 our board.  
2 MR. THOMPSON: Okay. So thank you very  
3 much, Mr. LaPierre. With that, I will pass the witness  
4 back to Mr. Mason.  
5 THE WITNESS: Thank you.  
6 MR. MASON: Mr. LaPierre, are you ready  
7 to continue, or would you like to take a break?  
8 THE WITNESS: I'm fine.  
9 MR. MASON: Okay.  
10 THE WITNESS: If you are.  
11 MR. MASON: I am good.  
12 MR. GARMAN: Brian, let me find your  
13 video. One second, please. There we are. You were  
14 just a voice from beyond before. We're ready.  
15 FURTHER EXAMINATION  
16 BY MR. MASON:  
17 Q. Mr. LaPierre, when did the NRA and the Brewer  
18 firm begin preparing the NRA Forward website?  
19 MR. GARMAN: Objection to the form of the  
20 question.  
21 A. I -- I don't know the exact date that the NRA  
22 began preparing the -- the website. I said that Andrew  
23 Arulanandam was brought in on the process to work with  
24 Travis and the Brewer firm, but I can't give you an  
25 exact date as to when. I just don't know.

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1 Q. (BY MR. MASON) Did the NRA and the Brewer  
2 firm begin working on the NRA Forward website before  
3 January the 7th?  
4 A. I don't know the answer to that.  
5 Q. Who are all the people at the Brewer firm that  
6 were involved and had input on the content on the NRA  
7 Forward website?  
8 A. As far as I know, the one that worked with  
9 Andrew was Travis.  
10 Q. And what's the basis for that knowledge?  
11 A. Just the fact that that's the one that in  
12 talking with me Andrew always told me he would talk  
13 with.  
14 Q. Have you made any attempts to determine  
15 whether anyone else at the Brewer firm besides  
16 Mr. Carter was involved in reviewing the content that  
17 was going to be going on the NRA Forward website?  
18 A. I haven't.  
19 Q. You're familiar with Wayne's Letter on the NRA  
20 Forward website. Correct?  
21 A. Yes, I am. I think Bill probably looked at  
22 some of it, too, Bill Brewer, before -- before it went  
23 forward also.  
24 Q. Do you know that? Is that your testimony on  
25 behalf of the NRA?

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1 MR. CORRELL: Don't speculate.  
2 A. I'm speculating, but -- I know Travis Carter  
3 did.  
4 MR. GARMAN: Hold on. So on this, I want  
5 to be clear. I want you to testify to what you know,  
6 and I want you to testify to what Andrew told us when we  
7 asked him these questions.  
8 A. Yeah, he worked with Travis Carter.  
9 Q. (BY MR. MASON) How much time did you spend  
10 preparing for your 30(b)(6) deposition today?  
11 A. We talked -- we chatted maybe 30 -- 30 minutes  
12 with Andrew and Mr. Garman and --  
13 Q. Okay. So once your individual deposition was  
14 done, you spent about 30 minutes preparing for your  
15 corporate representative deposition. Is that true?  
16 A. That's true.  
17 Q. Who prepared the first draft of Wayne's  
18 Letter?  
19 A. That was prepared by -- by Andrew Arulanandam  
20 and Travis Carter.  
21 Q. Did Mr. Arulanandam or Mr. Carter prepare the  
22 first draft?  
23 MR. GARMAN: Objection to the form of the  
24 question.  
25 But go ahead and answer.

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1 A. As far as I know, based on my conversation  
2 with Andrew, that -- that is -- is what happened.  
3 Q. (BY MR. MASON) Did Mr. Carter prepare the  
4 initial draft of the Wayne's Letter that ultimately is  
5 on -- currently on the NRA Forward website?  
6 A. I think they both -- they both worked together  
7 on all of that.  
8 Q. Do you know how long it took them to prepare  
9 that letter?  
10 A. I don't.  
11 Q. Do you know when they began preparing that  
12 letter?  
13 A. I think they started working on it a couple of  
14 days before.  
15 Q. When did you first review Wayne's Letter  
16 that's on the NRA Forward website?  
17 A. I think I was in here that whole day that we  
18 filed and was looking over material all day as we  
19 prepared to file.  
20 Q. Did you make any changes to Wayne's Letter  
21 before it was posted to the NRA Forward website?  
22 A. I can't -- I don't remember, to tell you the  
23 truth. If I did, they were minor.  
24 Q. Did you review the entirety of Wayne's Letter  
25 before it was posted to the NRA Forward website?

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1 A. Yeah. Yes, I believe I did.  
2 Q. Is it fair to say that a lot of time and  
3 effort went into preparing the NRA Forward website?  
4 MR. GARMAN: Objection to the form of the  
5 question.  
6 A. I'm sure that Andrew and Billy in working with  
7 Travis spent -- spent a lot of time on it, worked very  
8 hard for a couple days.  
9 Q. (BY MR. MASON) Why did the Brewer firm need  
10 to be involved in the preparation of the NRA Forward  
11 website?  
12 MR. GARMAN: Objection to the form of the  
13 question.  
14 Go ahead and answer if you can.  
15 A. Well, I think Andrew and Billy actually --  
16 actually did the website. It -- I think that Travis  
17 Carter would have been involved in some of the content  
18 working with Andrew.  
19 Q. (BY MR. MASON) Would you agree that it is  
20 important that all of the content on the NRA Forward  
21 website is -- is accurate?  
22 MR. GARMAN: Objection to the form of the  
23 question.  
24 A. I think it's always important to try to be  
25 accurate.

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1 Q. (BY MR. MASON) Words matter. Right?  
2 A. They do.  
3 MR. GARMAN: Objection to the form of the  
4 question.  
5 Go ahead.  
6 A. Yes, I agree with that.  
7 Q. (BY MR. MASON) Would you agree that -- well,  
8 strike that.  
9 And you would agree with me that on the NRA  
10 Forward website, it's important to make accurate  
11 statements to all of your NRA members. Correct?  
12 MR. GARMAN: Objection to the form of the  
13 question.  
14 Go ahead.  
15 A. We always try to make accurate statements to  
16 all of our members, yes, I agree.  
17 Q. (BY MR. MASON) Would you agree that the  
18 public statements made on the NRA Forward website are  
19 consistent with the NRA's legal positions in the  
20 bankruptcy?  
21 MR. GARMAN: Objection to the form of the  
22 question.  
23 MR. CORRELL: Yeah, I just want to also  
24 object on the grounds that it calls for legal  
25 conclusion.

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1 A. To the -- to the best of my knowledge, the  
2 statements on the NRA website are -- are -- are accurate  
3 and parallel the legal facts.  
4 Q. (BY MR. MASON) Do you believe that the  
5 statements on the NRA Forward website accurately reflect  
6 why the NRA filed for Chapter 11 bankruptcy?  
7 MR. CORRELL: This is Kent Correll.  
8 Objection to the form, also calls for legal conclusion.  
9 A. To the best of my knowledge, they do  
10 accurately reflect why the NRA filed for Chapter 11.  
11 Q. (BY MR. MASON) There was a press release that  
12 was also issued or also listed on the NRA Forward  
13 website. Are you familiar with that press release?  
14 A. I have read a number of press releases that we  
15 did in relation of that -- to this. I don't know which  
16 one you're specifically referring to.  
17 Q. Let's see. Let's take a look at exhibit --  
18 Ackerman Exhibit 90.  
19 (AMc Exhibit 90 marked.)  
20 Q. (BY MR. MASON) It should be in the folder.  
21 MR. GARMAN: It's there.  
22 A. Yeah, I'm looking at it right now.  
23 Q. (BY MR. MASON) Are you familiar with this  
24 press release, Mr. LaPierre?  
25 A. I am.

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1 Q. Who prepared the first draft of this press  
2 release?  
3 A. It was prepared by Andrew Arulanandam and  
4 Travis Carter.  
5 Q. Did Mr. Arulanandam or did Mr. Carter prepare  
6 the initial draft?  
7 MR. GARMAN: Objection to the form of the  
8 question.  
9 A. To the best of my knowledge, they worked as a  
10 team together on this and they collaborated together on  
11 it.  
12 Q. (BY MR. MASON) When was the first draft  
13 prepared?  
14 A. I think they were working on it a couple days  
15 before -- before the -- the bankruptcy was filed. I  
16 know they were working like around the clock on the  
17 couple days before the bankruptcy was filed on -- on all  
18 of this type of material.  
19 Q. Let's take a look at Exhibit 76, please.  
20 (AMc Exhibit 76 marked.)  
21 Q. (BY MR. MASON) It should be in the shared  
22 folder.  
23 MR. GARMAN: It's up.  
24 Q. (BY MR. MASON) Mr. LaPierre, do you see  
25 Ackerman Exhibit 76?

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1 A. I do.  
2 Q. And it looks like there's -- at the top it  
3 says leadership quotes. Do you see that?  
4 A. I do see that.  
5 Q. And there's a statement from yourself, and  
6 then if you keep going through, there's a statement from  
7 Ms. Meadows and then there's a statement from Mr. Brewer  
8 and then there's a statement from Mr. King. Do you see  
9 that?  
10 A. I do.  
11 Q. Who made the decision as to which leadership  
12 quotes were going to be -- well, let me back up.  
13 Who made the decision as to which leaders were  
14 going to be quoted on this particular page?  
15 MR. GARMAN: Objection to form.  
16 Go ahead and answer.  
17 A. I believe Andrew Arulanandam came up with the  
18 list of who he thought should be quoted.  
19 Q. (BY MR. MASON) Did Mr. Arulanandam consult  
20 with anyone else at the NRA before this was posted on  
21 the NRA Forward website?  
22 A. I believe he -- I'm pretty sure he mentioned  
23 to me in terms of these are people I'm thinking of using  
24 quotes from, and he mentioned one from me and then he  
25 mentioned these others.

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1 Q. Did Mr. Brewer ask if he could be quoted on  
2 the leadership quotes page?  
3 MR. CORRELL: Objection. This is  
4 Mr. Correll.  
5 To the extent that it calls for you to reveal  
6 any communications with attorneys about litigation, I  
7 instruct you not to answer.  
8 A. Well, as I said, I -- the one I talked to  
9 about this was Andrew. So Andrew would have the  
10 knowledge on whether it was his idea or whether he had a  
11 conversation with Mr. Brewer.  
12 Q. (BY MR. MASON) Does --  
13 A. I know I didn't have a conversation with  
14 Mr. Brewer about it.  
15 Q. Does Mr. Arulanandam have complete control as  
16 to the NRA's public relations and the statements that  
17 are put out by the NRA?  
18 A. He is director of public affairs for the  
19 National Rifle Association, and he directs that  
20 operation. He -- he runs by -- statements by a number  
21 of people. He runs -- depending on what the subject, he  
22 runs it by me. He runs them by Jason Ouimet, the ILA  
23 director, Institute for Legislative Action. He runs  
24 them by Joe DeBergalis, the director of general  
25 operations. It depends on the nature of the subject,

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1 but he doesn't -- he doesn't do it usually on his own --  
2 sometimes he might -- without -- without also seeking  
3 input or running it by somebody.  
4 Q. And when you say "running it by somebody," are  
5 you referring to running it by somebody at the NRA or  
6 running it by somebody at the Brewer firm?  
7 A. Well, I'm talking about at the NRA, but as I  
8 said, he works with -- if it's a legal issue, he works  
9 with Travis Carter at the Brewer firm on it if it  
10 involves any of these litigation matters or -- or this  
11 type of matter.  
12 Q. Why was John Frazer not quoted on the  
13 leadership quotes page on the NRA Forward website?  
14 MR. GARMAN: Objection to form.  
15 A. I don't have any idea. These are the names  
16 Andrew suggested be there, and I -- you'd have to ask  
17 Andrew why they didn't decide to -- I mean, other people  
18 aren't quoted either. I mean, I don't think it was  
19 anything particularly involving John Frazer or aimed at  
20 John Frazer. It was just these are the people Andrew  
21 came up with that he thought should be quoted.  
22 Q. (BY MR. MASON) Do you agree that Mr. Brewer  
23 is one of the leaders within the NRA?  
24 MR. GARMAN: Objection to the form of the  
25 question.

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1 A. No. Mr. Brewer is litigation counsel working  
2 for the NRA. I would not say he's a leader of the NRA.  
3 Q. (BY MR. MASON) Let's take a look at  
4 Exhibit 128, please.  
5 (AMc Exhibit 128 marked.)  
6 MR. GARMAN: Okay. We have it.  
7 Q. (BY MR. MASON) Mr. LaPierre, have you seen  
8 this before, this article before?  
9 MR. GARMAN: Counsel, Mr. LaPierre hasn't  
10 read it. I'm either going to ask that he read it or you  
11 represent what it is.  
12 MR. MASON: Sure.  
13 A. I have not seen it.  
14 Q. (BY MR. MASON) Sure.  
15 A. I have not seen the article before.  
16 Q. Let me back up and ask one question.  
17 Mr. LaPierre, you testified that I believe on  
18 January 15, the day that the NRA was filing for  
19 bankruptcy, you reviewed the various materials that were  
20 going to be posted on the NRA Forward website. Is  
21 that -- is that accurate?  
22 A. I reviewed all kinds of material that day.  
23 I -- yes, I reviewed a lot of material that day. I  
24 don't know whether I reviewed everything that was going  
25 to be posted on the website, but I reviewed a lot of --

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1 a lot of press releases and letters to vendors and  
2 letters to the board and other things like that.  
3 Q. Okay. So going back to Ackerman Exhibit 128,  
4 this is a press release that was put out by Stephen  
5 Gutowski that is titled "NRA Board to Hold Emergency  
6 Hearing Amid Bankruptcy Turmoil."  
7 And if you will, Mr. LaPierre, I would like  
8 for you to scroll down to the second page, please.  
9 MR. GARMAN: Counsel, this is a press  
10 release?  
11 MR. MASON: Well, I'm sorry. It's not a  
12 press release from the NRA. It's a news article. Thank  
13 you for that correction.  
14 Q. (BY MR. MASON) And if you will, the first  
15 full paragraph. It states, You could have seen the top  
16 of my car blow off with my head, Journey said, because I  
17 knew what that meant. It meant that those three lawyers  
18 committed a lie of omission of material facts to the  
19 board of directors. Nobody said bankruptcy.  
20 Do you see that?  
21 A. I do see that.  
22 MR. GARMAN: So I am going to object.  
23 You haven't laid foundation for this document, but go  
24 ahead.  
25 Q. (BY MR. MASON) And then Mr. Brewer, it  
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1 states, Counsel to the NRA says that Journey is  
2 mistaken. Judge Journey purportedly supports the  
3 mission of the NRA and claims not to oppose the  
4 association seeking to reincorporate in Texas, he said  
5 in a statement. Unfortunately, he seems to mistakenly  
6 believe that the NRA reorganization plan did not follow  
7 board and internal protocol. This plan was undertaken  
8 in full compliance with the NRA policy. The plan has  
9 been widely endorsed by NRA board members, NRA members,  
10 elected officials and other key stakeholders.  
11 Do you see that?  
12 A. Yeah.  
13 Q. So my first question for you is who at the NRA  
14 authorized Mr. Brewer to make this statement?  
15 MR. GARMAN: Objection first -- objection  
16 to the form of the question and objection, lacks  
17 foundation.  
18 MR. CORRELL: I would also -- this is  
19 Kent Correll. I object to the extent that it calls for  
20 disclosure of any confidential attorney/client  
21 communication.  
22 A. It would be a conversation between Andrew  
23 Arulanandam and Mr. Brewer. I haven't seen this  
24 article, and I haven't seen this quote.  
25 Q. (BY MR. MASON) When Mr. Brewer makes a  
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1 statement in the press -- well, let me ask you this. As  
2 you sit here today, are you aware of any statements that  
3 Mr. Brewer has made in the press relating to the  
4 bankruptcy that have been run or approved by you first?  
5 A. No, I don't -- I don't know of any statement  
6 that Mr. Brewer has made that -- a press release or  
7 anything that was run by me. I know that in this quote,  
8 the plan was widely endorsed by the board members. I  
9 mean, since we have had an overwhelming support from  
10 board members and NRA members and elected officials in  
11 terms of -- since the filing. I mean, people have --  
12 our members have been cheering, to tell you the truth,  
13 and so have elected officials.  
14 Q. So when Mr. Brewer says this plan was  
15 undertaken in full compliance with the NRA policy, do  
16 you understand that he is stating that the plan to file  
17 Chapter 11 bankruptcy? Is that your understanding?  
18 MR. GARMAN: Objection to the form of the  
19 question.  
20 A. Yeah, I think he's accurately stating the  
21 truth, that it was -- the authority to file was  
22 delegated to the EVP's office, and I worked with the  
23 SLC, which is in compliance with NRA policy.  
24 Q. (BY MR. MASON) Who are all the board members  
25 that supported the NRA filing Chapter 11 bankruptcy in  
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1 Dallas, Texas, prior to the January 7th board meeting?  
2 MR. GARMAN: Objection to the form of the  
3 question, objection to foundation.  
4 A. We discussed it at length. The resolution  
5 that was passed delegated to the EVP's office the  
6 authority to reorganize, and I consulted with the  
7 special litigation committee, Carolyn Meadows, Willes  
8 Lee, Charles Cotton. We were very concerned about  
9 leaks, as I've said on this, because if it had leaked --  
10 given from her own statements, we believed General  
11 James, had she been informed of it by through a leak,  
12 would have tried to put the NRA into receivership, which  
13 would have destroyed the NRA. So --  
14 MR. MASON: Could I have my question read  
15 back, please?  
16 (Requested testimony read.)  
17 MR. GARMAN: Counsel, I believe he  
18 answered your question.  
19 MR. CORRELL: Same objections.  
20 Q. (BY MR. MASON) Prior to the January 7th board  
21 meeting.  
22 MR. GARMAN: Object to the form of the  
23 question, asked and answered.  
24 You can identify the same individuals again.  
25 A. I consulted with Carolyn Meadows, Willes Lee,  
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1 Charles Cotton, and the authority was delegated to the  
2 EVP's office to reorganize at that board meeting. And I  
3 wasn't in the room, so I don't know all the discussions  
4 that took place on that resolution.  
5 Q. (BY MR. MASON) Since January 15, have any  
6 other board members besides Mr. Liptak resigned from the  
7 NRA board?  
8 MR. GARMAN: Object to the -- object to  
9 it being outside the scope.  
10 Go ahead and answer.  
11 A. Not that I'm aware of.  
12 Q. (BY MR. MASON) We can take a look at  
13 Exhibit 91, please.  
14 (AMc Exhibit 91 marked.)  
15 Q. (BY MR. MASON) And while your counsel is  
16 pulling that up, Mr. LaPierre, are you aware of any  
17 leaks relating to the executive committee meeting that  
18 took place on January 7th?  
19 MR. GARMAN: Object to the form of the  
20 question, object that it's outside the scope of the  
21 examination.  
22 Go ahead.  
23 A. I am not aware of any leaks that took place at  
24 that January 7th meeting, no, I'm not.  
25 Q. (BY MR. MASON) Is the reason that there were  
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1 not any leaks because Chapter 11 bankruptcy was not  
2 discussed?  
3 MR. GARMAN: Objection to the form of the  
4 question.  
5 MR. CORRELL: Objection to the form and  
6 no foundation.  
7 A. I don't know the answer to that.  
8 Q. (BY MR. MASON) If you could take a look at  
9 Exhibit 91. I believe this -- we may have looked at  
10 this before. This is the questions and answers section  
11 of the NRA Forward website. Do you see that?  
12 A. Yes, I do.  
13 Q. Was anyone else involved with the preparation  
14 of these questions and answers besides Mr. Arulanandam  
15 and the Brewer law firm?  
16 A. Not that I know of, based on my discussions  
17 with -- with Andrew Arulanandam earlier today.  
18 Q. When did the NRA begin preparing Exhibit 91?  
19 A. As I've said, I think they worked on it a  
20 couple of days before the -- the bankruptcy was  
21 announced. They were working around the clock on this  
22 stuff.  
23 Q. If you'll go down to the third page about  
24 two-thirds of the way down. Do you see the question  
25 when will the restructuring process be completed?  
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1 A. I see that.  
2 Q. And the NRA states here, This process begins  
3 immediately. The NRA is expected to emerge from these  
4 proceedings within the next six months.  
5 Do you see that?  
6 A. I do see that.  
7 Q. Is it your testimony that it was just  
8 Mr. Arulanandam and Mr. Travis Carter that were involved  
9 in preparing the answer to this question?  
10 MR. GARMAN: Objection to the form of the  
11 question.  
12 A. I believe -- my belief on this question is  
13 that you would have to ask Andrew, but I would probably  
14 bet that on the specific legal issue of proceed within  
15 the next six months, they probably consulted legal  
16 counsel.  
17 Q. (BY MR. MASON) What's the factual basis for  
18 the statement that the NRA is expected to emerge from  
19 these proceedings within the next six months?  
20 MR. GARMAN: Objection to the form of the  
21 question.  
22 A. I have no personal knowledge of that. You  
23 would need to ask -- it would be a question for the  
24 attorneys and the bankruptcy attorneys, and I don't have  
25 the -- I don't have the answer.  
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1 Q. (BY MR. MASON) You are the NRA's corporate  
2 representative designated on the NRA Forward website.  
3 Is that right?  
4 MR. GARMAN: Objection. He's our  
5 designated representative for question 8.  
6 Q. (BY MR. MASON) Is that true, Mr. LaPierre?  
7 A. I am the designee for the question -- the  
8 Ackerman questions here today on -- that are  
9 highlighted.  
10 MR. GARMAN: Counsel, for clarity of the  
11 record, I have a highlighted copy of the -- of the  
12 notice in front of me. That's simply all that's here.  
13 Q. (BY MR. MASON) And just to be clear,  
14 Mr. LaPierre, you were the corporate representative on  
15 the Ackerman topics 5 and 8. Is that correct?  
16 MR. GARMAN: The witness is referring to  
17 my copy --  
18 A. That's correct, 5 and 8.  
19 Q. (BY MR. MASON) And with respect to topic 8,  
20 did you review any of the contents on the NRA Forward  
21 website before testifying as the NRA corporate  
22 representative today?  
23 A. I did not. I had conversations with Andrew  
24 Arulanandam about who -- about the process and who he  
25 worked with, and that's the conversations I had along,  
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1 with counsel from the Garman firm.  
 2 MR. MASON: All right. Let's go off the  
 3 record. I think I'm about done. Let me see if I've got  
 4 any other questions.  
 5 MR. GARMAN: Sure.  
 6 THE VIDEOGRAPHER: We're going off the  
 7 record. The time on the video is 5:49 p m.  
 8 (Break from 5:49 p m. to 5:51 p.m.)  
 9 THE VIDEOGRAPHER: We're back on the  
 10 record. The time on the record is 5:51 p.m.  
 11 Q. (BY MR. MASON) Mr. LaPierre, the general  
 12 counsel of the National Rifle Association, John Frazer  
 13 on Thursday testified that if the filing of the  
 14 bankruptcy was not authorized then it could not be filed  
 15 in good faith. My question for you is do you agree with  
 16 that statement  
 17 MR. GARMAN: I object to the form of the  
 18 question. I object to the extent it calls for a legal  
 19 conclusion.  
 20 A. I said earlier if the board had not delegated  
 21 the authority to the EVP's office to reorganize, I would  
 22 not have proceeded ahead with a reorganization.  
 23 MR. MASON: All right. I am going to  
 24 pass the witness at this point, save the -- reserve the  
 25 rest of our 30(b)(6) time, unless Mr. Thompson has any  
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1 other questions.  
 2 MR. THOMPSON: No. Thank you. I will  
 3 pass the witness as well.  
 4 MR. DRAKE: This is Scott Drake. On  
 5 behalf of the Committee, we have no further questions of  
 6 Mr. LaPierre.  
 7 MR. GARMAN: Thank you, Scott.  
 8 Mr. Videographer, if you would put on the  
 9 record the amount of time each of the parties used on  
 10 the 30(b)(6) before we go off, I think we would all  
 11 appreciate it.  
 12 THE VIDEOGRAPHER: Yes. Mr. Thompson  
 13 used 32 minutes and Mr. Mason used 32 minutes.  
 14 MR. GARMAN: Good.  
 15 MR. MASON: Consistent. Okay. I've got  
 16 nothing else.  
 17 Thank you, Mr. LaPierre.  
 18 THE WITNESS: Thank you.  
 19 THE VIDEOGRAPHER: This concludes today's  
 20 deposition. The time on the video is 5:53 p.m. We are  
 21 off the record.  
 22 (Proceedings ended at 5:53 p.m.)  
 23  
 24  
 25  
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1 CHANGES AND SIGNATURE  
 2 WITNESS NAME: WAYNE LAPIERRE  
 3 DATE OF DEPOSITION: MARCH 23, 2021  
 4 PAGE LINE CHANGE REASON  
 5 \_\_\_\_\_  
 6 \_\_\_\_\_  
 7 \_\_\_\_\_  
 8 \_\_\_\_\_  
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 24 \_\_\_\_\_  
 25 Job No TX4510606  
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1 I, WAYNE LAPIERRE, have read the foregoing  
 2 deposition and hereby affix my signature that same is  
 3 true and correct, except as noted above.  
 4  
 5 \_\_\_\_\_  
 6 WAYNE LAPIERRE  
 7  
 8 THE STATE OF \_\_\_\_\_ )  
 9 COUNTY OF \_\_\_\_\_ )  
 10 Before me, \_\_\_\_\_, on  
 11 this day personally appeared WAYNE LAPIERRE, known to me  
 12 (or proved to me under oath or through  
 13 \_\_\_\_\_) (description of identity  
 14 card or other document) to be the person whose name is  
 15 subscribed to the foregoing instrument and acknowledged  
 16 to me that they executed the same for the purposes and  
 17 consideration therein expressed.  
 18 Given under my hand and seal of office this  
 19 \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.  
 20  
 21  
 22 \_\_\_\_\_  
 23 NOTARY PUBLIC IN AND FOR  
 24 THE STATE OF \_\_\_\_\_  
 25  
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1 STATE OF TEXAS )  
2 COUNTY OF DALLAS )  
3 I, Julie C. Brandt, Certified Shorthand  
4 Reporter in and for the State of Texas, certify that the  
5 foregoing deposition of WAYNE LAPIERRE, VOLUME 2, was  
6 reported stenographically by me remotely via Zoom, said  
7 witness having been placed under oath by me, and the  
8 deposition is a true record of the testimony given by  
9 the witness;

10 That the amount of time used by attorneys at  
11 the deposition is as follows:  
12 Mr. Sheehan - 1 hour, 28 minutes  
13 Mr. Thompson - 32 minutes  
14 Mr. Drake - 46 minutes  
15 Mr. Mason - 3 hours, 18 minutes

16 I further certify that I am neither counsel  
17 for, nor related to any party in the cause and am not  
18 financially interested in its outcome.

19 In witness whereof, I have subscribed my name  
20 this 24th day of March, 2021.

21  
22 *Julie C. Brandt*  
Julie C. Brandt, CSR, RMR, CRR  
23 TX CSR No. 4018, Exp. 10/31/21  
Veritext Legal Solutions  
24 Firm Registration No. 571  
300 Throckmorton Street, Suite 1600  
25 Fort Worth, Texas 76102

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1 ggarman@gtg.legal  
2 March 24, 2021  
3 National Rifle Association Of America And Sea Girt LLC  
4 DEPOSITION OF: Wayne LaPierre , Vol. 2 (# 4510606)  
5 The above-referenced witness transcript is  
6 available for read and sign.

7 Within the applicable timeframe, the witness  
8 should read the testimony to verify its accuracy. If  
9 there are any changes, the witness should note those  
10 on the attached Errata Sheet.

11 The witness should sign and notarize the  
12 attached Errata pages and return to Veritext at  
13 errata-tx@veritext.com.

14 According to applicable rules or agreements, if  
15 the witness fails to do so within the time allotted,  
16 a certified copy of the transcript may be used as if  
17 signed.

18 Yours,  
19 Veritext Legal Solutions  
20  
21  
22  
23  
24  
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