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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 1  
IN HIS INDIVIDUAL CAPACITY AND  
AS CORPORATE REPRESENTATIVE OF  
THE NATIONAL RIFLE ASSOCIATION OF AMERICA  
MARCH 22, 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 22nd day of March, 2021, from  
6 9:24 a m to 6:04 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  
12  
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 13 David MacGreevey (Remote appearance)  
 14 David Dell'Aquila (Remote appearance)  
 15  
 VIDEOGRAPHER:  
 16 Dan Reidy - Veritext Legal Solutions  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

1 PROCEEDINGS  
 2 THE VIDEOGRAPHER: Good morning. We are  
 3 going on the record at 9:24 a.m. on Monday, March 22,  
 4 2021.  
 5 Please note that audio and video recording  
 6 will continue to take place until all parties agree to  
 7 go off the record.  
 8 This is media unit 1 of the video recorded  
 9 deposition of Wayne LaPierre, taken by counsel for the  
 10 Movant In the Matter -- or In Regards to the National  
 11 Rifle Association of America and Sea Girt, LLC.  
 12 This case is filed in the United States  
 13 Bankruptcy Court for the Northern District --  
 14 MR. SHEEHAN: All right. Could I ask the  
 15 court reporter to swear the witness?  
 16 MR. GARMAN: He's not quite done.  
 17 MR. SHEEHAN: I'm sorry.  
 18 MR. GARMAN: The court reporter is not  
 19 quite done.  
 20 MR. SHEEHAN: I'm sorry. Okay.  
 21 MR. GARMAN: It's the Northern District  
 22 of Texas.  
 23 THE VIDEOGRAPHER: -- Northern District  
 24 of Texas, Caption Case No. 21-30085-hdh-11.  
 25 This deposition is being held at the National

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1 Rifle Association, located at 11250 Waples Mill Road,  
 2 Fairfax, Virginia 22030.  
 3 I am Dan Reidy from Veritext Legal Solutions,  
 4 and I am the videographer. The court reporter is Julie  
 5 Brandt from the firm Veritext Legal Solutions.  
 6 MR. GARMAN: Ms. Court reporter, I  
 7 believe we're ready to swear in the witness.  
 8 WAYNE LAPIERRE,  
 9 having been first duly sworn and having confirmed that  
 10 he is Wayne LaPierre, testified remotely as follows:  
 11 EXAMINATION  
 12 BY MR. SHEEHAN:  
 13 Q. Good morning, Mr. LaPierre. We're here to  
 14 take --  
 15 A. Good morning.  
 16 Q. I'm sorry?  
 17 A. I said "good morning."  
 18 Q. Oh, good.  
 19 We here today to take your deposition in a  
 20 contested bankruptcy proceeding brought by the National  
 21 Rifle Association. I'm Jim Sheehan. You may recall me  
 22 from our encounter about nine months ago. I'm an  
 23 assistant attorney general with the New York State  
 24 Attorney General's Office, and I represent the Attorney  
 25 General's Office in this proceeding.

1 I know that you have had your deposition taken  
2 before. Have you had your deposition taken since the  
3 last time we met in June of 2020?  
4 A. I took a deposition with the Under Wild Skies  
5 Dycio law firm.  
6 Q. And who took that deposition?  
7 A. I think it was Mr. Biggs who is an attorney  
8 with Dycio firm.  
9 Q. Okay. When was that?  
10 A. I think about two months ago.  
11 Q. Okay. And in addition to that deposition two  
12 months ago, have you had your deposition taken between  
13 June of 2020 and the present?  
14 A. I don't believe so.  
15 Q. Okay.  
16 MR. GARMAN: Counsel, it's Greg Garman.  
17 Just to identify again, he did sit under oath at the 341  
18 meeting at your office.  
19 MR. SHEEHAN: Correct.  
20 MR. GARMAN: I want to be clear about  
21 that.  
22 Q. (BY MR. SHEEHAN) Okay. Are you represented  
23 today by counsel?  
24 A. I am. Mr. Kent Correll from the Correll Law  
25 Group.

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1 I would ask you to hold until I'm done and I will do my  
2 best to do the same. And if you don't understand a  
3 question that I ask, I'll ask you to ask me to rephrase  
4 it or repeat it. Do you understand that instruction?  
5 A. (Witness nods head.)  
6 Q. You're nodding your head yes.  
7 A. I do understand.  
8 Q. Okay.  
9 A. Yes, I do.  
10 Q. If you need a break at any time, please let us  
11 know. I may want to finish a certain question, but  
12 after that you're allowed to take a break as you ask for  
13 it.  
14 A. Okay.  
15 Q. Okay. You're Wayne Robert LaPierre. Is that  
16 correct?  
17 A. That's correct.  
18 Q. And what other names have you ever used?  
19 A. Well, I use Wayne LaPierre.

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1 Q. Okay. There is also counsel for the debtor.  
2 Is that correct?  
3 A. Yes, sir. It's Greg Garman from Garman Turner  
4 Gordon. In the room with me today are Teresa Pilatowicz  
5 and Talitha Gray Kozlowski who are my colleagues.  
6 Q. And as you know in a deposition, I'll be  
7 asking some questions. The court reporter will take  
8 down your testimony and make a complete transcript.  
9 Because she's trying to take everything down, and  
10 especially since you're wearing a mask, it will help if  
11 you try to answer each question out loud with a verbal  
12 response. Do you understand that instruction?  
13 A. I will do that.  
14 Q. When you were at CPAC, did you wear a mask  
15 this year?  
16 A. I went straight from the car -- I had a mask  
17 on. I took the mask off when I went up on stage. I put  
18 the mask on the minute I came off stage.  
19 Q. So how long were you on stage with the mask  
20 off?  
21 A. Maybe 16 minutes, 15 minutes.  
22 Q. All right. In addition, we're going to have  
23 to speak one at a time, and this is especially true  
24 since this is a remote deposition. So you may think you  
25 know the answers to my questions before you finish, but

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[REDACTED]



1 Q. (BY MR. SHEEHAN) Under the accounting system  
 2 at the NRA, do you have to write down the purpose of the  
 3 trip and the place that you visited with respect to  
 4 hotel bills?  
 5 A. I do.  
 6 Q. Do you do that --  
 7 A. And --  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 Q. All right. And are security expenses put  
 17 through Portia Padilla?  
 18 A. The security expenses are put through the  
 19 treasurer's office.  
 20 Q. And is that still true today?  
 21 A. That is true today.  
 22 Q. Do you remember -- (audio unclear.)  
 23 MR. GARMAN: I'm sorry. I'm sorry. This  
 24 is Greg Garman. Your microphone might be on the table,  
 25 because when you go through documents, it creates an

Page 18

1 awful racket.  
 2 MR. SHEEHAN: Got it. Thank you.  
 3 Appreciate that.  
 4 Q. (BY MR. SHEEHAN) Are you familiar with a  
 5 gentleman named Powell, Joshua Powell?  
 6 A. Yes, I am.  
 7 Q. And he was your hunting buddy and then he was  
 8 your chief of staff?  
 9 MR. GARMAN: Objection as to form.  
 10 A. I wouldn't call him my hunting buddy. I went  
 11 hunting with him, I think, once on a taping of Under  
 12 Wild Skies. He was chief of staff.  
 13 Q. (BY MR. SHEEHAN) Did you read his book?  
 14 A. I did not read his book.  
 15 Q. Why not?  
 16 A. Because I know the truth, and I did not think  
 17 that what was in that book was true, and I thought why  
 18 bother reading it.  
 19 Q. How would you know it wasn't true if you  
 20 didn't read it?  
 21 A. Because I believe that by that time he was  
 22 creating a bunch of nonsense, and I -- it wasn't worth  
 23 my time to read. I knew the truth. I knew the facts.  
 24 I knew what we had done in this place. I knew the good  
 25 we had done in this place. I knew what we built. I

Page 19

1 knew how we built it. And I also knew everything we had  
 2 been doing since 2017 to self-correct this organization  
 3 and bring it in -- ensure it was in complete compliance  
 4 with New York state not-for-profit law, and there wasn't  
 5 anything that I was aware of that we had done that could  
 6 have been a problem.  
 7 Q. There was nothing -- there was nothing you  
 8 were aware of that could be a problem. Is that what you  
 9 just said?  
 10 MR. GARMAN: Objection as to form.  
 11 A. I -- everything we intended to do was to --  
 12 was to self-correct this place, take a 360-degree look  
 13 at it as Attorney General Schneiderman recommended to us  
 14 when he called me in 20 -- he called Tom King on our  
 15 board in 2017, and -- and the Attorney General of New  
 16 York, Eric Schneiderman, said that a plan had been  
 17 adopted by some of the anti people that didn't like the  
 18 NRA, the Bloomberg people, to improperly use the  
 19 government of New York state to target the NRA.  
 20 Although he didn't agree with some of the issues, he did  
 21 not think it was a proper use of government, and he  
 22 thought that New York state law -- a lot of changes had  
 23 been made in terms of nonprofit laws. He actually said  
 24 he probably thought no one was in real compliance, but  
 25 that doesn't matter, they intend to use the government

Page 20

1 to target you guys, and I recommend you take a complete  
 2 look at everything. If something is being done  
 3 improper, self-correct it. New York state has a safe  
 4 harbor provision. Make a good effort to look at every  
 5 employee, everything, every vendor and self-correct.  
 6 And that's the proper thing to do, given the pressure  
 7 being put on the government of New York state to --  
 8 to -- to target the NRA improperly.  
 9 Q. (BY MR. SHEEHAN) And was that a conversation  
 10 you had with Mr. Schneiderman?  
 11 A. No, Tom King on our board of directors had it  
 12 with Mr. Schneiderman. Steve Shulman, our former  
 13 general counsel to the board, had -- was a friend of  
 14 Attorney General Schneiderman. He had formed a  
 15 relationship between Tom King and -- who was in New York  
 16 and the Attorney General. As I said, they didn't agree  
 17 on the issue, but they became friends, and the Attorney  
 18 General Schneiderman was very offended by what he  
 19 thought was an improper use of government authority to  
 20 essentially weaponize the government of New York state  
 21 against this great nonprofit organization, the NRA,  
 22 that's been in existence since 150 years and does  
 23 firearm training, safety education, 14,000 law  
 24 enforcement instructors, 130,000 instructors on safety  
 25 and training --

Page 21

1 Q. Mr. LaPierre, I am going to break my own rule  
2 here. I asked you whether you talked to  
3 Mr. Schneiderman. Did you talk to Mr. Schneiderman?  
4 A. No, I did not. Tom King relayed the  
5 conversation to me.  
6 Q. Okay. And did he relay it in writing or  
7 orally?  
8 A. He called me on the phone and relayed to me.  
9 Q. Did you record in any way what he told you?  
10 Did you write it down?  
11 A. I did not. I listened very carefully to what  
12 he said.  
13 Q. So -- and how many years ago was this?  
14 A. It was in 2017. I think in the summer of  
15 2017.  
16 Q. So almost four years ago you remember that  
17 level of detail of the conversation?  
18 A. I sure do.  
19 MR. GARMAN: Objection as to form.  
20 Q. (BY MR. SHEEHAN) Did Mr. King send you any  
21 follow-up memo summarizing the conversation, alleged  
22 conversation with Mr. Schneiderman?  
23 A. He did not. He talked to me on the phone  
24 and -- on the phone.  
25 Q. Did he convey to the board the message with  
Page 22

1 Mr. Schneiderman that he allegedly had?  
2 MR. GARMAN: Objection as to form.  
3 A. I don't know whether Tom King conveyed it at  
4 some point because we began to act on it. I'm sure we  
5 informed the board of the conversation because what I  
6 did is I -- I called one of our attorneys, our outside  
7 attorneys, and he --  
8 MR. GARMAN: Objection, just to caution  
9 the witness not to divulge the substance of any  
10 communications between Mr. LaPierre or -- either  
11 individually or on behalf of the NRA and any attorney  
12 that he was speaking to for the purpose of --  
13 Q. (BY MR. SHEEHAN) Let's do this here because,  
14 again, you're not answering my question, Mr. LaPierre.  
15 What I asked you was did Tom King communicate  
16 to the board his conversation with Mr. Schneiderman?  
17 MR. GARMAN: Objection as to form.  
18 Answer his question.  
19 A. I believe I recall he did at some point.  
20 Q. (BY MR. SHEEHAN) Was the conversation in the  
21 minutes of the board meetings or any committee of the  
22 board?  
23 A. I don't -- I can't remember whether it was in  
24 executive session or in the minutes.  
25 Q. Did you send anything in writing to members of  
Page 23

1 the board saying this is the information we've received  
2 from Tom King in this conversation with Schneiderman?  
3 A. I talked about it with board members.  
4 Q. What board members?  
5 A. I can't remember. It was a long time ago, but  
6 it was a -- it was a major issue.  
7 Q. My question was what board members?  
8 A. Yeah, and my answer is I don't remember.  
9 Q. Okay.  
10 A. I believe -- I believe --  
11 Q. You believe?  
12 A. That's my answer, I don't remember.  
13 Q. Okay. With respect to Mr. Powell, is it true  
14 that, as stated in his book at page 224, that President  
15 Trump told you on April 2019 that you're spinning  
16 yourself to death?  
17 MR. GARMAN: Objection as to form.  
18 A. President Trump was -- mentioned that we're  
19 having a lot of legal costs and there are a lot of cheap  
20 lawyers around.  
21 Q. (BY MR. SHEEHAN) That's what President Trump  
22 said to you?  
23 A. Pretty much.  
24 Q. With respect to Mr. Powell, did you know that  
25 Bill Brewer discussed a job at his law firm with Josh  
Page 24

1 Powell?  
2 MR. GARMAN: Objection as to form.  
3 A. I did not know that.  
4 Q. (BY MR. SHEEHAN) All right. In page 220 of  
5 his book, Mr. Powell quotes you saying about John  
6 Frazer, I wouldn't use him for my parking tickets.  
7 Did you say that?  
8 MR. GARMAN: Objection as to form.  
9 A. I think I made a joke at one point about John  
10 a long time ago because John tended to argue or be --  
11 follow up with -- and I think I said it as a -- as a  
12 joke at one point.  
13 Q. (BY MR. SHEEHAN) Did you --  
14 A. I don't -- I believe John is a very competent  
15 attorney, and I have been incredibly impressed with the  
16 work that he's done ever since we put him into the  
17 general counsel's office.  
18 Q. Was Mr. Frazer the general counsel of the NRA  
19 at the time you said you wouldn't use him for your  
20 parking tickets?  
21 A. I can't -- I can't remember that. I don't  
22 know.  
23 Q. Was -- did you say this to Mr. Frazer's face?  
24 MR. GARMAN: Objection as to form.  
25 A. No, I didn't. No, I didn't.  
Page 25

1 Q. (BY MR. SHEEHAN) Who did you say it to?  
2 A. I respect John. He's a very good attorney,  
3 and I think he is -- he is doing an exceptional job in  
4 that role.  
5 Q. Who did you say this to?  
6 MR. GARMAN: Objection as to form.  
7 Q. (BY MR. SHEEHAN) "This" being I wouldn't use  
8 him for my parking tickets.  
9 MR. GARMAN: Objection as to form.  
10 A. I -- I may have said it as a joke at some  
11 point to Josh possibly.  
12 Q. (BY MR. SHEEHAN) Okay. Have you ever flown  
13 on Bill Brewer's private jet?  
14 A. I have not.  
15 Q. All right. Do you know if Bill Brewer bills  
16 the use of his private jet to the NRA?  
17 MR. GARMAN: Objection to form.  
18 A. I -- I don't know the answer to that. I would  
19 be speculating.  
20 Q. (BY MR. SHEEHAN) Who would be responsible for  
21 knowing whether Mr. Brewer is billing his private jet  
22 travel to the NRA at the NRA?  
23 A. The treasurer's office.  
24 Q. A person?  
25 A. And also John Frazer would know that because

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1 John Frazer -- what happens to any of the Brewer legal  
2 bills is they come in, they are vetted by -- as the  
3 appropriate NRA process, they are vetted by the general  
4 counsel's office --  
5 Q. Mr. LaPierre, my question was who knows?  
6 MR. GARMAN: Sir, he's telling you who  
7 knows through the process.  
8 MR. CORRELL: Mr. Sheehan, I have to  
9 insist that you allow the witness to finish his answer.  
10 MR. SHEEHAN: He is filibustering and not  
11 answering the question.  
12 A. The answer to the question is that John Frazer  
13 vets all the Brewer bills. He sees them all. He asks  
14 any questions about them. And then they go to the  
15 treasurer's office, and they -- they vet them also, and  
16 then they pay them.  
17 Q. (BY MR. SHEEHAN) Okay.  
18 A. And that is the NRA process under the auspices  
19 that's in place.  
20 Q. At page 259 of Mr. Powell's book, he says with  
21 respect to the expense report issues in the fall of 2009  
22 for Josh Paul, quote, This is all Craig, he's just out  
23 to get you, unquote.  
24 Is that an accurate summary of what you said  
25 to Josh Powell about the expense issues in the fall of

Page 27

1 2019?  
2 A. I don't --  
3 MR. GARMAN: Hold up.  
4 Objection, Counsel. He's indicated he hasn't  
5 read the book.  
6 MR. SHEEHAN: I know.  
7 Q. (BY MR. SHEEHAN) But I'm asking you did you  
8 say that to Josh Powell?  
9 MR. GARMAN: Objection as to form.  
10 A. I do not think I said that to Josh Powell.  
11 Q. (BY MR. SHEEHAN) At page 45 Josh Powell says  
12 about you, he would meet with people, "yes" them to  
13 death and then he would disappear, what he called the  
14 rope-a-dope.  
15 Have you ever used the phrase "rope-a-dope" in  
16 your work at the NRA?  
17 MR. GARMAN: Objection as to form.  
18 A. Yes, I have used the phrase "rope-a-dope." I  
19 think a lot of people use the word "rope-a-dope" in  
20 terms of based on Muhammad Ali's fight with George  
21 Foreman.  
22 I don't -- what was your question again? I'm  
23 sorry, Mr. Sheehan.  
24 Q. (BY MR. SHEEHAN) It was a simple yes/no  
25 question. Have you used the phrase "rope-a-dope" in

Page 28

1 your work at the NRA?  
2 A. I may have used the phrase "rope-a-dope" in  
3 terms of something we were dealing with at the NRA.  
4 Q. Have you ever used the phrase "gasoline on the  
5 fire" about your fundraising efforts at the NRA to Josh  
6 Powell?  
7 MR. GARMAN: Objection as to the form of  
8 the question.  
9 A. I don't believe I've used that to Josh Powell,  
10 I've ever said that to Josh Powell.  
11 Q. (BY MR. SHEEHAN) Have you used the phrase  
12 "gasoline on the fire" to refer to fundraising efforts  
13 at the NRA?  
14 MR. GARMAN: Objection as to form.  
15 A. I did not use that phrase in relation to  
16 fundraising efforts at the NRA.  
17 Q. (BY MR. SHEEHAN) Did you use that phrase with  
18 respect to any other work at the NRA?  
19 A. I remember one time, probably in the -- in the  
20 1980s maybe, going back that far, where I was talking  
21 with Angus McQueen about the fact that we needed to --  
22 to, I think, build more pressure on -- to get people to  
23 sign a discharge petition that we were working on.  
24 Either that or the highlight the crime issue, the fact  
25 of the criminal was the real problem, and I used that

Page 29



1 phrase that we need to be stronger. It was totally  
 2 taken out of context by Ackerman McQueen in one of the  
 3 documents that I've read and -- in terms of when it was  
 4 used, how it was used, and all their reference to it is  
 5 completely out of context and untrue.  
 6 Q. Okay. What, if anything, did you do to  
 7 prepare for this deposition today?  
 8 A. I met with my attorney Kent Correll for three  
 9 hours on Saturday. Yesterday, I met with my attorney  
 10 Kent Correll and also Mr. Garman. We got on the phone  
 11 for a little while with Bill Brewer. And then it went  
 12 back into a meeting with Kent Correll and with  
 13 Mr. Garman.  
 14 Q. Did you review any documents in preparation  
 15 for today's testimony?  
 16 A. I did not.  
 17 MR. GARMAN: Counsel, before we move on,  
 18 this is his individual deposition, correct?  
 19 MR. SHEEHAN: I'm sorry. This is the  
 20 individual deposition, yes.  
 21 MR. GARMAN: I just wanted to make sure  
 22 we -- the prep might be different for the two, so I want  
 23 to make sure our record is clear.  
 24 Q. (BY MR. SHEEHAN) Okay. So Mr. LaPierre, just  
 25 to follow up on that issue that was just raised in the  
 Page 30

1 discussion, the preparation that you did both Saturday  
 2 and Sunday, was that for your 30(b)(6) deposition or for  
 3 this deposition, that meaning the individual deposition?  
 4 MR. GARMAN: Counsel, let me insert  
 5 myself just to be clear. I don't want to make a mess of  
 6 this.  
 7 MR. SHEEHAN: Okay.  
 8 MR. GARMAN: We have done the 30(b)(6),  
 9 but there is additional information that the witness  
 10 needs to be educated, and so we plan to do that  
 11 before -- we plan to continue that before we commence  
 12 the 30(b)(6), and so his testimony is the totality of  
 13 the preparation we've done. We covered a portion of the  
 14 30(b)(6), but we will likely be talking to other folks  
 15 at the NRA to complete his 30(b)(6) preparation.  
 16 MR. SHEEHAN: Okay. All right.  
 17 Q. (BY MR. SHEEHAN) Did you discuss your  
 18 testimony today with anyone else besides your -- besides  
 19 the two attorneys that you've mentioned and Mr. Brewer  
 20 prior to the deposition?  
 21 A. I did not.  
 22 Q. All right. Mr. Powell quotes your spouse  
 23 saying your management style was, quote, no management  
 24 style at all, unquote.  
 25 Have you heard her say that?  
 Page 31

1 MR. GARMAN: Objection to the form of the  
 2 question.  
 3 A. I have not heard her ever say that.  
 4 In fact, I'm very proud of my management  
 5 style. I -- it's very open. I let everyone have a say.  
 6 I -- I make sure that everyone's heard. I search for  
 7 the best ideas for the NRA, what would be in the best  
 8 interest of the NRA after giving everyone a chance to  
 9 speak their mind. I value teamwork and I value input,  
 10 and if you give everyone that chance, I think you end up  
 11 with the -- making the best decision in the interest of  
 12 the organization.  
 13 Q. (BY MR. SHEEHAN) And do you also impose high  
 14 ethical standards on the people who work for you at the  
 15 NRA?  
 16 MR. GARMAN: Objection to the form of the  
 17 question.  
 18 Go ahead and answer.  
 19 A. Yes. Yes, I do. Everything I do, I try to do  
 20 in the best interest of the NRA and always have. I've  
 21 worked my tail off for this organization to build it  
 22 into a 5 million member organization, and I'm very proud  
 23 of what we've done. I've very proud of the work of the  
 24 NRA, as one of the oldest civil rights organizations,  
 25 and everything it does, from legislative advocacy to all  
 Page 32

1 its programs.  
 2 Q. (BY MR. SHEEHAN) Mr. LaPierre, are you an  
 3 actor?  
 4 A. I am not --  
 5 MR. GARMAN: Objection to the form of the  
 6 question.  
 7 A. I am not an actor for -- I was probably the  
 8 first person to do television for the NRA. For the  
 9 better part of 35, 40 years, I have been the principal  
 10 brand spokesperson for the NRA, carrying the voice of  
 11 our NRA members throughout the country on television,  
 12 hundreds of television appearances, video appearances,  
 13 radio, grassroots appearances around the country,  
 14 speaking engagements, and -- and I've also done some  
 15 television shows for the NRA, debates for the NRA, in my  
 16 role as -- in my role as representing our members, who  
 17 are the key to making everything in this organization  
 18 work.  
 19 Q. (BY MR. SHEEHAN) Mr. LaPierre, I asked you a  
 20 very simple question. Are you an actor? Yes or no?  
 21 A. I am not an actor.  
 22 Q. Okay. Thank you.  
 23 Let us go at this point to Exhibit 1.  
 24 MR. SHEEHAN: Jonathan, could you get us  
 25 Exhibit 1?  
 Page 33

1 MR. GARMAN: Counsel, I actually am  
2 slightly embarrassed to regret that I haven't logged  
3 into the Veritext system yet. I can do it now, or we  
4 can go off the record for --  
5 MR. SHEEHAN: Let's go off the record,  
6 and we'll come back when you're ready.  
7 MR. GARMAN: Sorry about that.  
8 MR. SHEEHAN: No problem.  
9 THE VIDEOGRAPHER: We're going off the  
10 record. The time on the video is 9:59 a.m.  
11 (Break from 9:59 a.m. to 10:07 a.m.)  
12 THE VIDEOGRAPHER: We're back on the  
13 record. The time on the video is 10:07 a.m.  
14 Q. (BY MR. SHEEHAN) Mr. LaPierre, the -- do you  
15 know whether Tom King recorded the conversation with  
16 Attorney General Schneiderman?  
17 A. I do not.  
18 Q. All right. On page 51 of Josh Powell's book  
19 he says, Behind Wayne LaPierre's office was a smaller  
20 room filled with 6-foot high stacks of yellow legal  
21 pads.  
22 This is when he first started at the NRA.  
23 When he first started at the NRA, was that true, that  
24 you had a 6-foot high stack of yellow legal pads?  
25 MR. GARMAN: Objection as to the form of  
Page 34

1 the question.  
2 A. There was a bunch of old NRA trash back in  
3 there that we cleaned out years ago. It was in the NRA  
4 trash where nobody knew where to put the old boxes. We  
5 threw them out years ago.  
6 Q. (BY MR. SHEEHAN) Is it true that you use  
7 yellow pads to record your notes of conversations today?  
8 A. I -- I do sometimes.  
9 Q. All right. And did your counsel review those  
10 yellow pads in -- "your counsel" meaning either personal  
11 or NRA -- in preparing responses to document requests by  
12 the attorney general's office in this proceeding?  
13 MR. GARMAN: Objection to the form of the  
14 question.  
15 Go ahead and answer.  
16 A. All of my legal pads were turned over to  
17 the -- to the NRA's legal counsel, and I believe they  
18 were given to the State of New York.  
19 Q. (BY MR. SHEEHAN) That is in connection with  
20 this bankruptcy proceeding?  
21 A. I don't really have legal pads in relation to  
22 the bankruptcy proceeding.  
23 Q. Was there a point at which you stopped making  
24 notes on yellow legal pads after the subpoena from the  
25 attorney general's office in 2019?  
Page 35

1 A. I did not make as many notes because -- notes  
2 because -- unless they were privileged communications  
3 with attorneys, by and large.  
4 Q. Okay. So if -- you turned over all the yellow  
5 legal pads in connection with this proceeding that you  
6 had in your possession. Is that correct?  
7 MR. GARMAN: Objection to the form of the  
8 question.  
9 A. That's correct.  
10 Q. (BY MR. SHEEHAN) And so the -- well, okay.  
11 Is it true that you didn't keep a filing draw  
12 of draft memos when you first met with Wayne -- with  
13 Josh Powell when he started the job?  
14 MR. GARMAN: Objection to the form of the  
15 question. I didn't understand that one. Can you do it  
16 again?  
17 Q. (BY MR. SHEEHAN) Did you -- in 2016 when Josh  
18 Powell became your chief of staff, did you ever draft  
19 memos yourself?  
20 A. I don't think I did draft -- draft memos.  
21 Q. Did you keep a file drawer or a file for  
22 conversations with specific individuals showing what  
23 your conversations had been?  
24 MR. GARMAN: Objection to the form of the  
25 question.  
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1 Q. (BY MR. SHEEHAN) As of 2016 when he first  
2 started.  
3 A. I didn't keep a file drawer of people with  
4 specific conversations.  
5 Q. Did you use a computer in 2016?  
6 A. I did not.  
7 Q. Do you use a computer now?  
8 A. I do not.  
9 Q. Did you use a computer at any time between  
10 2016 and the present?  
11 A. I have not.  
12 MR. GARMAN: Objection to the form of the  
13 question.  
14 Go ahead.  
15 Q. (BY MR. SHEEHAN) Do you ever use text in your  
16 position at the NRA?  
17 A. I do not.  
18 Q. Do you tweet in your position at the NRA?  
19 A. No, I don't.  
20 Q. Do you ever send emails in your position of  
21 the executive vice president of the NRA?  
22 A. I -- I don't.  
23 Q. Did you --  
24 A. Occasionally --  
25 Q. I'm sorry.  
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1 A. Occasionally it's possible from time to time  
2 that -- and I'm not sure of this -- that Andrew  
3 Arulanandam, our public relations director, may have  
4 sent out an email on something, but I didn't do it.  
5 Q. To your knowledge, were emails sent out under  
6 your name by Mr. Arulanandam?  
7 A. It is -- it is possible, but I'm not sure.  
8 Q. Is Mr. Arulanandam authorized to send out  
9 emails with your name on them without your review?  
10 A. No. If he sent something out, he would have  
11 showed it to me.  
12 Q. Okay. When people text you at the NRA -- let  
13 me go back.  
14 Do people text you at the NRA in the course of  
15 your work?  
16 MR. GARMAN: Objection to the form.  
17 A. Sometimes people send texts, yes.  
18 Q. (BY MR. SHEEHAN) And how do you read those  
19 texts, if you do?  
20 A. Most of the time, I don't read them, to tell  
21 you the truth. I mean, I just -- I just -- I just  
22 don't -- that's just not my method of communication.  
23 Q. So most of the time -- let me see if I  
24 understand. Most of the time when you get a text sent  
25 to you, you don't read it. Is that correct?

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1 A. That's correct.  
2 Q. How do you decide which text to read?  
3 A. I -- I don't. Within the last two or three or  
4 four months, if a text pops up, I might happen to read  
5 it, but that was only a recent thing I started to do.  
6 Q. What was the reason that you --  
7 A. I don't answer -- and I don't answer back.  
8 Q. Why don't you answer back?  
9 MR. GARMAN: Objection to the form.  
10 A. I just have never got used to doing that. I'm  
11 old. I just don't do it.  
12 Q. (BY MR. SHEEHAN) You were born in 1949.  
13 Correct?  
14 A. Correct.  
15 Q. You said in the last two to three months, if I  
16 understand correctly, that you started to read texts.  
17 And where do you read them?  
18 A. If -- if somebody had sent me a text on my  
19 phone in the last, you know, month or two, like two or  
20 three months, like a telephone number for a call, I -- I  
21 would read that.  
22 Q. And --  
23 A. I started to do that.  
24 Q. Did something change about your electronic  
25 devices that are available to you in the last two to

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1 three months?  
2 A. No. They were just -- people were like, I  
3 want to get you this number, and they said I'll text it  
4 to you. And I realized it popped up on my phone, so I  
5 started reading it.  
6 Q. Okay. What kind of phone --  
7 A. I know it sounds like I'm from the Stone Age,  
8 but maybe I'm a Stone Age guy when it comes to this type  
9 of technology.  
10 Q. But it also makes it possible, doesn't it,  
11 Mr. LaPierre, for no one to know that they have a  
12 written response from you to anything?  
13 MR. GARMAN: Objection to form.  
14 A. Well, that -- that never was the intent on any  
15 of that.  
16 Q. (BY MR. SHEEHAN) What electronic devices do  
17 you get your texts on?  
18 A. The only one would be my phone.  
19 Q. And what's the phone number for that phone?  
20 A. I don't --  
21 MR. GARMAN: Counsel, are we putting this  
22 in a confidential portion of the transcript?  
23 MR. SHEEHAN: I hadn't planned to. Is  
24 that -- is that your request?  
25 MR. GARMAN: It is.

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1 Q. (BY MR. SHEEHAN) Okay. So Mr. LaPierre --  
2 MR. SHEEHAN: And Ms. Brandt, I assume  
3 that's doable, correct, it won't show up on the  
4 transcript if we make that part confidential?  
5 THE REPORTER: Yes, I can put it under a  
6 separate cover.  
7 MR. SHEEHAN: Okay. Thank you.  
8 Q. (BY MR. SHEEHAN) Mr. LaPierre, what is the  
9 phone number for that cell phone?  
10 A. You know, believe it or not, I don't know it.  
11 I can get it to you. I don't know it off the top of my  
12 head.  
13 Q. Okay. What kind of phone is it?  
14 A. It's an iPhone.  
15 Q. All right. Do you have an iPad?  
16 A. I do not.  
17 Q. The phone calls that you make out, are they on  
18 a landline at the NRA or do you use your iPhone as well?  
19 MR. GARMAN: Objection to form.  
20 Go ahead.  
21 A. I use both. I use a landline at the NRA and I  
22 use my iPhone.  
23 Q. (BY MR. SHEEHAN) Do you use any other phones  
24 besides your iPhone and the landline to make calls out  
25 in the course of your work at the NRA?

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1 A. There is one other phone at the house that --  
2 that I use from time to time.  
3 Q. All right. I take it from your answer that  
4 you mean infrequently you use that phone at the house?  
5 A. Yes, infrequently I use that phone.  
6 Q. Okay. Mr. Powell says at page 51 of his book,  
7 There was a joke around the office that the only way to  
8 make eye contact with Wayne was to lie down on the floor  
9 while talking to him.  
10 Have you ever heard that before?  
11 MR. GARMAN: Objection to the form of the  
12 question.  
13 A. That is just ridiculous. I mean, I talk with  
14 everyone at the NRA. I'm as open as you can be. I want  
15 everyone's ideas. I'm the most accessible guy to our  
16 members and to -- to people. I work as a team with  
17 people, and that's just ridiculous.  
18 Q. (BY MR. SHEEHAN) Okay. The security bills  
19 that we talked about before -- I'm sorry, the security  
20 threats that we talked about before, where would I go  
21 within the NRA to find the record of those security  
22 threats?  
23 MR. GARMAN: Counsel, let me just  
24 interject here, not to stop the answer, but I want to  
25 catch myself. I think I may have messed up before.

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1 (Requested testimony read.)  
2 MR. GARMAN: Objection as to form.  
3 Go ahead and answer.  
4 A. The NRA director of security.  
5 Q. (BY MR. SHEEHAN) And who was that?  
6 A. It is currently Mr. Jim Staples.  
7 Q. And does he maintain a written record of the  
8 threats?  
9 MR. GARMAN: Objection to the form.  
10 Go ahead.  
11 A. You'd have to talk to Mr. Staples as to how he  
12 does all of that.  
13 Q. (BY MR. SHEEHAN) Does Mr. Staples prepare for  
14 you any report of the threats that have been received  
15 about you?  
16 A. He doesn't prepare a report to me. He calls  
17 me from time to time and tells me if there's some -- if  
18 the threat level is extremely high and he thinks I need  
19 to leave town because he can't protect me at our house  
20 or if there are particular death threats they are  
21 particularly worried about.  
22 Q. And what, if any, record do you make of these  
23 calls with Mr. Staples concerning security threats?  
24 A. I don't make a record of them. I just listen  
25 to what he says on the phone.

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1 To the extent that we're talking about his  
2 individual security protocols again, I would like to go  
3 back and make those confidential to protect his  
4 identity. So if we're going to head down that again,  
5 I'd like to agree to that.  
6 MR. SHEEHAN: Let me go off the record  
7 for a second, because I'm not sufficiently comfortable  
8 with what agreement we've reached on that issue and I  
9 need some advice. So let's go off the record again.  
10 THE VIDEOGRAPHER: We're off the record.  
11 The time on the video is 10:19 a m.  
12 (Break from 10:19 a m. to 10:20 a m.)  
13 THE VIDEOGRAPHER: We're back on the  
14 record. The time on the video is 10:20 a m.  
15 Q. (BY MR. SHEEHAN) All right. Mr. LaPierre, do  
16 you have Exhibit 1 in front of you?  
17 MR. GARMAN: Yes, he does. Counsel, as  
18 we discussed before, I'll represent the setup of the  
19 room is one in which the screen is quite far away from  
20 us. So Mr. LaPierre is looking at a second screen  
21 connected to my laptop, and the only thing that's  
22 available for him to see is your Exhibit 1.  
23 MR. SHEEHAN: Ms. Brandt, could you read  
24 back the previous question about the security threat  
25 record? I don't think we got an answer.

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1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

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[REDACTED]

7 Q. That was 2018. Correct?

8 A. Correct.

9 Q. Let's turn now to Exhibit 1.

10 (Exhibit 1 marked.)

11 Q. (BY MR. SHEEHAN) And are you familiar,

12 Mr. LaPierre, with what has been marked as Exhibit 1?

13 A. Is that the 990?

14 Q. That's 990 and supporting schedules for 2019.

15 Are you familiar with that document?

16 A. I am familiar with it.

17 Q. Okay. And you'll see on the first page, it

18 says name and address of principal officer, Wayne R.

19 LaPierre. Is that statement on the 990 correct as of

20 2019?

21 A. Yes, it is.

22 Q. Were you also the principal officer of the NRA

23 in 2017 and 2018?

24 A. I was.

25 Q. Okay. Do you know why the 2017 and 2018 990s

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1 do not identify you as the principal officer?

2 A. I don't.

3 Q. Okay. All right. If you look at the first

4 page of the 990, you'll see at the bottom signature of

5 officer Wayne R. LaPierre Executive Vice President.

6 A. Correct.

7 Q. And -- and, in fact, you did sign this return

8 electronically. Correct?

9 MR. GARMAN: Objection to form.

10 Go ahead.

11 A. I signed the 990. I -- I don't know whether I

12 signed it electronically or not. I know I signed the

13 990.

14 Q. (BY MR. SHEEHAN) So the document in front of

15 you, which is taken from the New York State Attorney

16 General's records of filings, is that an exact copy of

17 what you signed?

18 A. If that's the 990, I signed the 990.

19 Q. And do you recall whether you signed it on the

20 signature block on part II or whether you signed a

21 separate document?

22 A. I don't recall that, Mr. Sheehan. I just know

23 I signed the 990.

24 Q. Okay. If you look at that on part I, the

25 summary, you will see it says number of voting members

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1 of the governing body and it has the number 73. That's

2 in question 3. Is that answer correct?

3 A. Number of voting members of the governing

4 body. That would be, I assume, our board of directors.

5 Am I correct?

6 Q. I'm asking you because you signed it and

7 certified it was true.

8 At the time that this was filed on November 18

9 of 2020, were there 73 members of the governing body?

10 MR. GARMAN: I'm going to object as to

11 form.

12 But I am going to instruct you not to

13 speculate. Testify as to your personal knowledge.

14 A. Yeah, I -- when I scanned through this and

15 read the parts that I particularly thought I needed to

16 focus on, I didn't really focus on that line. This was

17 prepared by our treasurer's people, our tax

18 professionals, our outside tax professionals, and I

19 relied on them.

20 Q. (BY MR. SHEEHAN) So sitting here today, you

21 don't know whether, in fact, there were 73 members of

22 the board of directors -- 73 voting members of the

23 governing body as of 11/18/2020. Correct?

24 MR. GARMAN: Objection to the form of the

25 question.

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1 A. I -- I don't. I don't know what they were

2 referring to on that -- on that line.

3 Q. (BY MR. SHEEHAN) Okay. And when you signed

4 this document in November of 2020, you did not make any

5 effort to determine whether that number of voting

6 members was correct?

7 MR. GARMAN: Objection to the form of the

8 question.

9 A. I just relied on the professional competence

10 of our tax preparers, our treasurer's office, our

11 outside tax professionals, and I relied on them for

12 that.

13 Q. (BY MR. SHEEHAN) All right. With respect to

14 the professionals that you relied upon, who were they?

15 A. It would be our treasurer's office. It would

16 be our general counsel office. It would be our outside

17 tax counsels to the -- to the NRA.

18 Q. So let's walk through that.

19 Treasurer's office, whose job was it within

20 the treasurer's office to make sure that the 990 was

21 accurate?

22 A. That would be the treasurer Mr. Craig Spray

23 and his staff in the treasurer's office.

24 Q. Okay. With respect to the general counsel,

25 whose job was it to make sure that the 990 was correct?

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1 A. That would be Mr. John Frazer and his staff.  
2 Q. With respect to outside advisers, whose job  
3 was it to make sure the 990 was correct?  
4 A. They had a number -- I think a number of  
5 outside tax experts that worked with them on this. I  
6 think one was -- one was -- I'm not positive of this. I  
7 think one was Don Lan.  
8 Q. Anybody else?  
9 A. Not that I know of.  
10 Q. What was the role of the Aronson firm in  
11 preparing the 2019 990 for the NRA?  
12 A. I don't know. The Aronson was -- a new audit  
13 firm that the NRA hired after RSM, and they did the 2019  
14 audit, which was a very clean audit, and they also  
15 checked all -- double checked all of our control systems  
16 and everything else, and we were very proud of the fact  
17 that we had a clean audit for 2019.  
18 Q. Mr. LaPierre, what was the role of the Aronson  
19 firm in preparing the 2019 990 for the NRA?  
20 A. I don't know the answer to that.  
21 Q. Did the Aronson firm have any role in  
22 preparing the 990 for the NRA for 2019?  
23 A. You would have to ask our treasurer's office  
24 and tax expert who worked on this.  
25 Q. Okay. Was there a paid preparer for the 2019

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1 990 for the NRA?  
2 A. You'd have to ask the treasurer's office or  
3 our general counsel or the -- you'd have to ask our  
4 treasurer's office.  
5 Q. The signature block says that I have examined  
6 the return including -- take a look at the signature  
7 block language on Exhibit 1, part II. Do you see that?  
8 A. Yes.  
9 Q. It says, I examined the return, including the  
10 accompanying schedules and statements. Correct?  
11 MR. GARMAN: Objection to form.  
12 A. Where are you -- where are you reading?  
13 Q. (BY MR. SHEEHAN) It says -- if you look at  
14 part II, signature block on Exhibit 1, it says, Under  
15 penalties of perjury, I declare that I've examined this  
16 return --  
17 A. I see that.  
18 Q. Okay.  
19 A. Right.  
20 Q. And to the best of my knowledge and belief, it  
21 is true and correct and complete.  
22 So what --  
23 A. That is correct.  
24 Q. Of what did your examination of the Exhibit 1  
25 consist?

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1 MR. GARMAN: Objection as to form.  
2 A. I -- I looked through it. I scanned through  
3 it. I read other parts in more detail than others, but  
4 I -- I looked through the whole thing as I -- before I  
5 signed it.  
6 Q. (BY MR. SHEEHAN) And --  
7 A. But --  
8 Q. -- is it true that at the time you signed this  
9 990, it was, to the best of your knowledge and belief,  
10 true, correct and complete?  
11 A. That's correct.  
12 Q. And as of March 22, 2021, is it still your  
13 belief that the 990 that was filed with the attorney  
14 general's office in New York is true, correct and  
15 complete?  
16 A. I don't have any reason not to believe that.  
17 Q. Does that mean you do believe it?  
18 MR. GARMAN: Object to form.  
19 A. Yeah, I believe it's true, accurate and  
20 complete.  
21 Q. (BY MR. SHEEHAN) Okay. Did the NRA ask the  
22 Aronson firm to sign off as paid preparer for the 990?  
23 A. I don't know the answer to that.  
24 Q. All right. Prior to signing the 990 in  
25 November 2020, did you talk to the Aronson firm about

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1 the completion of the IRS 990 for 2019 for the NRA?  
2 A. I did not.  
3 Q. All right. Did you review any memos from the  
4 Aronson firm concerning the 2019 2020 -- I'm sorry.  
5 Did you review any memos or other documents  
6 from the Aronson firm concerning the preparation of the  
7 2019 990?  
8 A. I did not.  
9 Q. In prior years, Craig Spray is the person who  
10 signed off on the 990 that is 2018 and 2017. Can you  
11 tell me why Craig Spray did not sign the 2019?  
12 MR. GARMAN: Objection as to form.  
13 A. I don't. I did not talk to Craig Spray about  
14 why he didn't sign the 990. I didn't have a  
15 conversation with him about it.  
16 Q. (BY MR. SHEEHAN) Did you personally decide to  
17 sign the 990 for 2019 yourself?  
18 A. I told everybody I would be happy to sign it  
19 because I was proud of it because it reflected all  
20 the -- a lot of the self-correction work that the NRA  
21 had started into from 2017 forward when we -- after the  
22 Schneiderman call where we hired Morgan Lewis to help us  
23 with governance, and then we -- we had started down this  
24 path of looking at everything, self-correcting and  
25 self-improving, improving our compliance controls,

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1 making sure they were robust. And it reflected a lot of  
2 the work that we had done, so I was proud to sign it.  
3 Q. Let me -- you say that you hired Morgan Lewis  
4 to help you with governance. When was that?  
5 A. It was after the Schneiderman call. We  
6 retained Morgan Lewis, one of the top nonprofit firms,  
7 to -- because everything General Schneiderman said to  
8 Tom King made sense to me. We didn't know whether --  
9 whether or not what he said was going to happen, which  
10 was the other side was going to improperly use the  
11 government or state to target the NRA. We weren't sure  
12 that it happened, but --  
13 (Reporter clarification.)  
14 MR. GARMAN: Yeah, so Mr. Sheehan, I  
15 think we're having the same microphone issue on your  
16 side. It is actually hard to hear you at points with  
17 the paper.  
18 MR. SHEEHAN: I'm not sure what, frankly,  
19 to do about that, because I do need my documents, but  
20 let's -- I will make an effort to avoid rustling papers  
21 during the answer.  
22 Q. (BY MR. SHEEHAN) Mr. LaPierre --  
23 A. When General Schneiderman said -- said that, I  
24 mean, we didn't know whether it was going to happen or  
25 not happen. When he said that they were making a huge  
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1 effort to improperly use the government of the New York  
2 state to target the NRA, he disagreed with that. He  
3 thought it was an improper use of government.  
4 But he thought we ought to do this major  
5 safety check, compliance review to make sure that we  
6 were in complete compliance with New York state  
7 not-for-profit law. So we hired -- the first thing we  
8 did, we hired Morgan Lewis, one of the top nonprofit  
9 firms, to help with governance issues and to start the  
10 NRA down that road, which we have continued down that  
11 road in 2017, 2018, 2019, 2020 and continue today down  
12 that road to improve.  
13 Q. So who at Morgan Lewis undertook the review?  
14 MR. GARMAN: You can tell him who at  
15 Morgan Lewis, but I instruct you not to discuss the  
16 content of the communication.  
17 A. You would need to talk to our general  
18 counsel's office to see who they communicated with  
19 primarily on that.  
20 Q. (BY MR. SHEEHAN) So is it fair to say you  
21 never communicated with Morgan Lewis on that?  
22 MR. GARMAN: Objection to form.  
23 A. I -- I had some conversations with the Morgan  
24 Lewis people, but most of it was done by counsel --  
25 counsel.  
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1 Q. (BY MR. SHEEHAN) What Morgan Lewis people did  
2 you have conversations about these issues?  
3 A. I can't -- I can't -- I can't remember.  
4 Q. Not a single Morgan Lewis lawyer that you can  
5 remember?  
6 MR. GARMAN: Objection as to form.  
7 A. I can't remember. That goes back primarily  
8 to 2017, although we had some additional opinions as  
9 we were going through this whole NRA issues over the  
10 last several years on whether what we were doing was  
11 proper --  
12 MR. GARMAN: Hold on. Hold on. Hold on.  
13 I think you're talking about your communications with  
14 Morgan Lewis.  
15 THE WITNESS: Right.  
16 MR. GARMAN: I'm not sure, but if you  
17 are --  
18 THE WITNESS: I am.  
19 MR. GARMAN: -- I would instruct you not  
20 to go any further.  
21 Q. (BY MR. SHEEHAN) Mr. LaPierre, did you rely  
22 upon Morgan Lewis' advice in making the changes to  
23 conform to New York state nonprofit law?  
24 A. We relied on Morgan Lewis. We also later on,  
25 as we -- as -- we retained the Brewer firm as the -- as  
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1 what General Schneiderman told us was going to happen  
2 started to play out --  
3 Q. Mr. LaPierre, I asked you did you rely upon  
4 Morgan Lewis's advice. That was the question. What's  
5 your answer?  
6 A. Yes, we did.  
7 Q. Okay. And did you rely upon their advice in  
8 performing your duties as the executive vice president  
9 of the NRA?  
10 MR. GARMAN: Objection as to form.  
11 A. The work that went on with Morgan Lewis was  
12 primarily work that went on with our -- with our general  
13 counsel's office. I did not -- was not involved  
14 in-depth with the -- with the work that was going on  
15 with Morgan Lewis.  
16 Q. (BY MR. SHEEHAN) What governance changes did  
17 the NRA make between the alleged Schneiderman call in  
18 the summer of 2017 and the retention of the Brewer firm  
19 in 2018?  
20 MR. GARMAN: Objection as to form.  
21 A. You would have to ask our general counsel  
22 that. The Brewer -- the Morgan Lewis firm, I think,  
23 were concentrating on a more general basis, in terms of  
24 governance and the IRS, to make sure NRA was in  
25 compliance. And that would be a treasurer's office  
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1 issue, a general counsel's office issue as opposed to a  
2 lot of the more specific litigation type issues that the  
3 Brewer firm got involved with, which -- which involved  
4 the department of financial services. It also involved  
5 the attorney general's office in New York after the  
6 attorney general said during her campaign that she --  
7 Q. (BY MR. SHEEHAN) Mr. LaPierre, that is  
8 totally nonresponsive to my question.  
9 MR. SHEEHAN: The court reporter,  
10 Ms. Brandt, could you read back the question again?  
11 (Requested testimony read.)  
12 MR. GARMAN: Objection as to form.  
13 A. And my answer is I'm not sure because I wasn't  
14 the principal one working with Morgan Lewis in terms of  
15 their work at that time.  
16 Q. (BY MR. SHEEHAN) And the -- do you know what  
17 the inquiry that was conducted by Morgan Lewis was  
18 between the alleged Schneiderman call and when the  
19 Brewer firm was hired?  
20 MR. GARMAN: Objection.  
21 MR. SHEEHAN: I am asking whether he  
22 knows it.  
23 MR. GARMAN: I understand. You can  
24 answer yes or no to that.  
25 A. I'm sorry. Could you read me the question

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1 again?  
2 Q. (BY MR. SHEEHAN) The question is do you know  
3 what inquiry the Morgan Lewis firm conducted between the  
4 alleged Schneiderman call and when the Brewer firm was  
5 hired concerning governance or the tax status of the  
6 NRA?  
7 MR. GARMAN: I instruct you not to invade  
8 the attorney/client privilege, but you can answer.  
9 A. No, I don't know specifically. I was so busy  
10 at that time with the -- with my other responsibilities.  
11 You had the Las Vegas shooting. You had the Somerville  
12 shooting. You had -- and I was -- I wasn't the one  
13 specifically working with Morgan Lewis on what they were  
14 working on.  
15 Q. (BY MR. SHEEHAN) In your view, was the  
16 alleged Schneiderman call a basis to believe the very  
17 existence of the NRA was at stake?  
18 A. It was in my belief that Attorney General  
19 Schneiderman relayed very clearly that the whole effort  
20 to weaponize the government of New York state from the  
21 AG's office, starting with the AG's office, but also  
22 going to the department of financial services, involved  
23 an attempt to destroy the National Rifle Association by  
24 using the incorporation of New York state and its  
25 nonprofit status, and he thought that was improper use

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1 of government and -- and he talked about the tremendous  
2 pressure being put on to go down that route.  
3 And I thought, yeah, it was a very real threat  
4 to the NRA, which is why I thought it made sense to  
5 begin to -- to do what the attorney general recommended,  
6 which made sense whether the investigation was going to  
7 happen or not.  
8 Look, I'm not a CPA. I'm not a lawyer. I'm  
9 not a tax person or anything like that. But I just  
10 thought it made good sense in general to take a look at  
11 everything the NRA was doing, every employee, every  
12 vendor, everything, and see if we were in compliance.  
13 Because if the investigation happened, that would be a  
14 good thing, and we would be prepared to proudly show  
15 everything we had done. And if it didn't happen, it was  
16 still a good thing to do.  
17 Q. Did Morgan Lewis ever interview you?  
18 A. I don't think they interviewed me, no.  
19 Q. Did you get any written reports from Morgan  
20 Lewis? "You" meaning you, Wayne LaPierre, personally.  
21 MR. GARMAN: Answer the question yes or  
22 no.  
23 A. No.  
24 Q. (BY MR. SHEEHAN) Did -- did the Aronson firm  
25 refuse to sign the Exhibit 1?

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1 A. I don't know.  
2 Q. The numbers that are in part I of the 990,  
3 where do they come from, that is the -- sorry, in the  
4 revenue and expenses and assets sections, where do those  
5 numbers come from?  
6 A. They would have been prepared by our -- our  
7 treasurer's office, to the best of my knowledge, by our  
8 tax professionals on the inside and the outside and  
9 working with our general counsel's office.  
10 Q. Do you know whether those numbers are  
11 accurate?  
12 A. Well, all I can do is rely on the  
13 professionals that we hire and trust, and they presented  
14 them as accurate to me, and I -- I rely on their  
15 professionalism and I trust them.  
16 Q. Okay. So you made no independent inquiry to  
17 determine if the numbers were correct in part II of --  
18 sorry -- part I of the Exhibit 1?  
19 MR. GARMAN: Objection as to the form of  
20 that question.  
21 A. I think I'm entitled to rely on our  
22 professionals that that's their job to do and their --  
23 and their good work. And I trust them, they're  
24 competent people, and I relied on their -- I relied on  
25 them.

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1 Q. (BY MR. SHEEHAN) Okay. So let's go to page 4  
2 of the 2019 990. And if you would look at questions 25a  
3 and b. Do you see that question, Mr. LaPierre?  
4 A. Did the organization -- (witness reading to  
5 himself.)  
6 Q. You're being pretty tough on Ms. Brandt.  
7 MR. SHEEHAN: Can you get all that,  
8 Ms. Brandt?  
9 THE REPORTER: No.  
10 Q. (BY MR. SHEEHAN) Okay. Can you go more  
11 slowly?  
12 A. I was just reading what the question said in  
13 those two sections.  
14 Q. And you'll see in 25a and b -- and we'll go  
15 back to what they say in a minute -- that the box is  
16 checked yes to both of those questions. Correct?  
17 A. Correct.  
18 Q. And you understand that checking the box yes  
19 to that means the corporation did engage in an excess  
20 benefit transaction with a disqualified person during  
21 the year. Is that correct?  
22 MR. GARMAN: Objection to form.  
23 Go ahead.  
24 A. That's correct.  
25 Q. (BY MR. SHEEHAN) And with respect to question  
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1 25b, is the organization aware it engaged in an excess  
2 benefit transaction with a disqualified person in a  
3 prior year and that the transaction has not been  
4 reported on any of the organization's prior forms 990 or  
5 990-EZ, was that answer true, correct and complete when  
6 you signed this 990 in November of 2020?  
7 MR. GARMAN: Objection to form.  
8 Go ahead.  
9 A. You know, I relied on the professional opinion  
10 of our lawyers, our tax preparers and our treasurer's  
11 office on that, so I -- I -- I relied on their judgment.  
12 Q. (BY MR. SHEEHAN) Do you believe today that  
13 those two answers are correct, that is 25a and 25b on  
14 part IV of Exhibit 1?  
15 A. I have no knowledge that they're not correct.  
16 I don't know why they wouldn't be correct.  
17 Q. Did you ask anyone at the NRA why we are  
18 checking yes to those two boxes, that is 25a and 25b of  
19 the part IV of the 990?  
20 A. I did not. I assumed that they knew what they  
21 were -- they were competent in terms of the areas they  
22 were dealing with and they prepared it appropriately.  
23 Q. At the time that you signed Exhibit 1, did you  
24 know that engaging in an excess benefit transaction with  
25 a disqualified person put the NRA's tax exemption in  
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1 jeopardy?  
2 MR. GARMAN: Objection to the form of  
3 that question.  
4 A. You know, I'm not a lawyer. I mean, I --  
5 you're asking legal issues. I am not an expert on New  
6 York not-for-profit law or -- I -- I really don't know  
7 the -- didn't know -- don't know the answer to that  
8 question.  
9 Q. (BY MR. SHEEHAN) So Mr. LaPierre, after  
10 Morgan Lewis went through and did the review in the  
11 summer of 2017 through 2018, after Mr. Brewer and his  
12 firm spent \$2 million a month of your money making sure  
13 you're 100 percent compliant, why is it that the NRA  
14 in -- for 2019 was not compliant with the excess  
15 benefits for disqualified persons standard?  
16 MR. CORRELL: This is Mr. Correll.  
17 Objection to form.  
18 MR. GARMAN: Objection to the form of the  
19 question. And I'm instructing you not to answer that  
20 question to the extent that it only could come from your  
21 conversations with counsel.  
22 Q. (BY MR. SHEEHAN) All right. Let me phrase it  
23 more specifically.  
24 Why is it, Mr. LaPierre, that after you told  
25 the Court in February of 2021 that the NRA was  
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1 100 percent compliant, that the most recent IRS 990  
2 filed by the NRA says you're not?  
3 MR. GARMAN: Objection. Objection to the  
4 form of the question. That's not what it says.  
5 Q. (BY MR. SHEEHAN) You can answer,  
6 Mr. LaPierre.  
7 A. I believe that the NRA has gone through an  
8 unbelievable process that I took the lead on, starting  
9 in 2017. As you heard me say before, Mr. Sheehan, if I  
10 lose every friend I've ever made, we are going down this  
11 principal path of looking at every employee, every  
12 vendor, everything. And if there's something that needs  
13 to be self-corrected, we're going to do it. And I don't  
14 care what the fallout is, and no one is going to drag us  
15 from that principle path.  
16 And we started in 2017. We started throughout  
17 2018. We started compliance seminars in 2018. In 2019,  
18 we were very proud of the fact that we had gotten to the  
19 point where we were -- the new audit firm, despite of it  
20 being aware of all the other issues -- whatever other  
21 issues there were, looked at controls, looked at  
22 everything, gave us a clean audit. And we continued to  
23 improve in 2020.  
24 I think it's a positive story for this  
25 organization. I think it's a great story. And I don't  
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1 think the organization could have been working harder to  
 2 go down the principal path of trying to be in complete  
 3 compliance with New York state or any other state's  
 4 nonprofit law.  
 5 Q. Okay. Let me ask you -- let me ask you this.  
 6 If you look at part V, the question 1c, did the  
 7 organization comply with backup withholding rules for  
 8 reportable payments to vendors and reportable gaming --  
 9 gambling winnings to prizewinners, and the box is  
 10 checked yes. How did you know that was true?  
 11 MR. GARMAN: Objection to the form of the  
 12 question.  
 13 A. I relied on our professional tax preparers,  
 14 our tax office and our general counsel's office that all  
 15 worked on this form, and I relied on their  
 16 professionalism. I had trust placed in them to do this  
 17 honestly and accurately.  
 18 Q. (BY MR. SHEEHAN) Are there workpapers related  
 19 to the preparation of the 2019 990 at the NRA?  
 20 A. I don't know the answer to that.  
 21 Q. Did you review any workpapers before signing  
 22 this return that was true, correct and complete?  
 23 A. I did not.  
 24 Q. Does the NRA have any gaming or gambling  
 25 winnings for prizewinners?

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1 MR. GARMAN: Object to the form of the  
 2 question.  
 3 A. You know, I -- you know, that's an issue that  
 4 you'd have to ask the tax preparers what they were  
 5 referring to. I mean, I would be speculating on what  
 6 they're talking about when you get into that. I mean,  
 7 I'll give you an example I know. We have a sweepstakes  
 8 where we do a truck raffle, so maybe it's referring to  
 9 that.  
 10 MR. GARMAN: Don't speculate.  
 11 A. But I'm speculating.  
 12 Q. (BY MR. SHEEHAN) Do you know with respect to  
 13 the truck raffle whether the backup withholding  
 14 requirements are -- I'm sorry, do you know with respect  
 15 to the truck raffle whether the reportable winnings  
 16 were, in fact, reported?  
 17 MR. GARMAN: Object to the form of the  
 18 question.  
 19 A. It's actually a truck sweepstakes that we do  
 20 through our magazines and -- and through the mail. I'm  
 21 not the guy on the specifics on all that.  
 22 Q. (BY MR. SHEEHAN) So you don't know the answer  
 23 of what is done with respect to reporting the winnings  
 24 as recited on part V, 1c?  
 25 MR. GARMAN: Object to the form of the

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1 question.  
 2 A. Our treasurer's office, our tax preparers and  
 3 our general counsel's office would -- I assume would  
 4 know.  
 5 Q. (BY MR. SHEEHAN) But you yourself, having  
 6 signed this document saying it's true, correct and  
 7 complete, do not know whether that answer is true,  
 8 correct, and complete?  
 9 MR. GARMAN: Objection to the form of the  
 10 question.  
 11 A. I believe it is because I -- I rely on  
 12 professionals in this field, in this building, out of  
 13 this building, professional tax preparers out of this  
 14 building, lawyers in this building and I rely on all of  
 15 our treasurer's office people. So as far as I know,  
 16 based on my reliance on them and the trust I place in  
 17 them and the belief they are professional, hard working  
 18 people, that these are -- this is accurate, that they do  
 19 good work. I couldn't possibly be involved in every bit  
 20 of detail, given all the rest of my responsibilities  
 21 where we talked about everything I'm doing.  
 22 Q. (BY MR. SHEEHAN) Mr. LaPierre, what I am  
 23 trying to find out is apart from trust and belief, what  
 24 effort did you make to make sure that the 990,  
 25 Exhibit 1, was accurate and correct?

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1 MR. GARMAN: Objection. You have asked  
 2 him that question. He's answered it now. He can answer  
 3 again.  
 4 Q. (BY MR. SHEEHAN) Mr. LaPierre?  
 5 A. I relied on the professional work of our  
 6 treasurer's office, our general counsel's office, the  
 7 outside tax preparers and all the work that they put in  
 8 to putting this document together.  
 9 Q. Okay. Let's go to part VI and look at  
 10 question number 5. Do you see question number 5 on part  
 11 VI?  
 12 A. I do.  
 13 Q. Did the organization become aware during the  
 14 year of a significant diversion of the organization's  
 15 assets? And you'll see the answer is checked yes. What  
 16 did you do to inform yourself about whether that answer  
 17 was correct?  
 18 MR. GARMAN: Objection to the form of the  
 19 question.  
 20 Go ahead.  
 21 A. My answer is to say I relied on the  
 22 professional opinions of our tax preparers, our  
 23 treasurer's office and our general counsels, that  
 24 they -- in preparing this document.  
 25 Q. (BY MR. SHEEHAN) Do you know, Mr. LaPierre,

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1 what the -- what this means, what it means to have a  
2 significant diversion of subassets of the organization?  
3 A. I -- I don't know that I know the legal  
4 definition of what that means.  
5 Q. What is the legal definition of what that  
6 means?  
7 A. I don't know that I know what the legal  
8 definition of what that means is.  
9 Q. What is it?  
10 MR. GARMAN: He just said he doesn't  
11 know.  
12 MR. SHEEHAN: No, he said he does know  
13 what --  
14 Q. (BY MR. SHEEHAN) I'm sorry. What is your  
15 understanding of what the legal definition of diversion  
16 of assets means?  
17 MR. GARMAN: Objection. Counsel, he said  
18 he does not know.  
19 A. I don't know.  
20 Q. (BY MR. SHEEHAN) Okay.  
21 A. I said I don't know the legal definition of  
22 what that means.  
23 Q. That is, you don't -- you don't know what a  
24 significant diversion of the organization's assets is?  
25 MR. GARMAN: Objection to the form of the  
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1 question, calls for a legal conclusion, asked and  
2 answered.  
3 Q. (BY MR. SHEEHAN) Mr. LaPierre?  
4 A. I am just not aware of that legal terminology  
5 and what it means. I -- I trusted our general counsel's  
6 office, our treasurer and our professional tax preparers  
7 understand it completely when they answered the  
8 question.  
9 Q. Do you know, Mr. LaPierre, how frequently the  
10 NRA has reported that it had a significant diversion of  
11 its organization's assets during the time that you've  
12 been the executive vice president of the NRA?  
13 MR. GARMAN: Objection to the form of the  
14 question.  
15 A. I do not know that.  
16 Q. (BY MR. SHEEHAN) Isn't it true that in the  
17 entire time that you've been at the NRA that answer has  
18 never been answered yes before?  
19 MR. GARMAN: Objection to the form of the  
20 question.  
21 Q. (BY MR. SHEEHAN) The answer to question 5 on  
22 part VI.  
23 MR. GARMAN: Objection to the form of the  
24 question. You're being argumentative now.  
25 A. I don't -- I don't know. I'm not aware of  
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1 what you just said. I don't know whether that's true or  
2 not true.  
3 Q. (BY MR. SHEEHAN) Are you aware that in the  
4 charities world, that the -- answering yes to question 5  
5 on part VI means the Charity Navigator, among other  
6 watch dogs, will not rate your organization?  
7 MR. GARMAN: Objection lack of  
8 foundation, objection to the extent it calls for a legal  
9 conclusion, objection to the form.  
10 Q. (BY MR. SHEEHAN) Mr. LaPierre?  
11 A. I am not -- I have heard of Charity Navigator.  
12 I am not aware of how -- how this applies to what they  
13 do. And I just -- it's not my area of expertise.  
14 Q. Do you know that less than 1/2 of 1 percent of  
15 charities that file electronically, like the NRA, with  
16 the IRS report yes to question 5?  
17 MR. GARMAN: Objection, lack of  
18 foundation. Object to the form of the question.  
19 A. Yeah, I wouldn't have any basis to know that.  
20 Keep in mind, if -- and I assume -- and our  
21 treasurer's office and tax preparers and our outside tax  
22 preparers can talk about this, but whatever they're  
23 doing on any of this is in the context of this whole  
24 self -correction in terms of what the NRA is doing to  
25 make sure we're in 100 percent compliance and best  
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1 practices with nonprofit law. So I mean, it -- it --  
2 you know.  
3 Q. Mr. LaPierre, did you -- you mentioned two  
4 compliance training programs, one in 2018 and one in  
5 2019. Did you attend the full session of either of  
6 those compliance training programs?  
7 MR. GARMAN: Objection to the form of the  
8 question. He didn't mention any such training program.  
9 Q. (BY MR. SHEEHAN) Mr. LaPierre, you can  
10 answer.  
11 A. Yeah, I -- I do not think I attended it. I  
12 was aware of what they were -- what they were -- of what  
13 the content of what they were relaying.  
14 Q. Do you think it's important for the CEO and  
15 executive vice president of an organization to show its  
16 support for compliance program by at least showing up to  
17 the training programs?  
18 MR. GARMAN: Objection to the form of the  
19 question.  
20 A. I actually would do that from now on if we do  
21 another one, but I had read what they were -- I was very  
22 much aware of what they were going down and what it  
23 contained and the information they were relaying.  
24 Q. (BY MR. SHEEHAN) And in fact, the  
25 representative that you sent to the first session in  
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1 2018 was Josh Powell. Correct?  
2 MR. GARMAN: Objection, lack of  
3 foundation. Object to the form of the question.  
4 A. I believe that's correct. Mr. Spray had had a  
5 heart attack. Mr. Powell was filling in for him. And  
6 you're correct, I believe it was Mr. Powell.  
7 Q. (BY MR. SHEEHAN) And so the person that you  
8 put in charge of communicating the compliance program to  
9 the employees of the NRA was a person that a year later  
10 you would fire for improper expense reports to the NRA.  
11 Is that correct?  
12 MR. GARMAN: Objection to the form of the  
13 question.  
14 A. As I said, Mr. Powell was filling in for  
15 Mr. Spray and, unfortunately, yes, a year later we did  
16 end up letting Mr. Powell go as part of -- as part of  
17 the fact that we -- compliance is an everyday rule of  
18 life around the organization now. There are no  
19 exception. If someone is not complying, they face  
20 consequences.  
21 Q. (BY MR. SHEEHAN) All right. So let us go now  
22 to question 11a on the 990. That is part VI. Has the  
23 organization provided a complete copy of this Form 990  
24 to all members of its governing body before filing the  
25 form? And the box is checked no. Is that answer

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1 correct?  
2 MR. GARMAN: Objection to the form of the  
3 question.  
4 Go ahead.  
5 A. Again, this was prepared by our general  
6 counsel's office, our -- our --  
7 Q. (BY MR. SHEEHAN) Mr. LaPierre, the question  
8 is is the answer to that question correct on 11a of part  
9 VI?  
10 A. I assume -- I assume it is correct because it  
11 was prepared by these professionals and relying on their  
12 professional judgment -- professional work. I believe  
13 that answer is correct.  
14 Q. Did anyone give the IRS 990 that was filed  
15 with the Attorney General's Office of New York to all  
16 members of the governing body before it was filed?  
17 MR. GARMAN: Objection to the form.  
18 A. I don't know the answer to that.  
19 Q. (BY MR. SHEEHAN) Is there a practice within  
20 the NRA of distributing the 990 that is to be filed with  
21 the board before the filing occurs?  
22 MR. GARMAN: Objection to the form.  
23 A. I'm -- as far as I know, the 990s are  
24 distributed through our board of directors to be -- to  
25 be looked at. I'm not sure exactly when that occurs.

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1 Q. (BY MR. SHEEHAN) Do you know with respect to  
2 Exhibit 1 when that was given to all members of the  
3 board of directors?  
4 A. I don't know when it was given to our board of  
5 directors.  
6 Q. Do you know with respect to the 990, Exhibit  
7 1, for 2019 when it was given to all members of the  
8 audit committee?  
9 A. I don't know when it was given to the audit  
10 committee. You'll have to ask our treasurer's office or  
11 our general counsel's office.  
12 Q. Do you know whether the completed 990, as  
13 filed with the New York Attorney General's Office, was  
14 ever given to either the audit committee or to the board  
15 of directors?  
16 MR. GARMAN: Objection as to the form.  
17 A. I -- I believe the 990 was given both to our  
18 audit committee and our board of directors.  
19 Q. (BY MR. SHEEHAN) And what do you base that  
20 belief on?  
21 A. The fact -- the fact that the NRA was working  
22 intensively on compliance, on controls. As I said, it's  
23 an ongoing process. The audit committee has been  
24 brought into all of this. The board of directors has  
25 been brought into all of this, and -- and I believe this

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1 form was shown to all of them.  
2 Q. And what do you base that belief on?  
3 MR. GARMAN: Objection to the form.  
4 A. I base it on -- one, I believe our attorneys  
5 were working with the audit committee on all of this in  
6 making them aware of everything, and I -- I -- the NRA,  
7 as a practice, I remember always talked about the 990  
8 being available to the board.  
9 Q. (BY MR. SHEEHAN) Do you believe it's an  
10 important part of an effective compliance program to  
11 distribute the 990 to the governing body before it's  
12 filed?  
13 MR. GARMAN: Objection as to the form of  
14 the question.  
15 A. You know, I'm not aware -- again, you're  
16 getting into an area where I'm not an expert on. I know  
17 the 990 was made available to our board. I don't know  
18 whether it's made available to them before it's filed or  
19 not.  
20 Q. (BY MR. SHEEHAN) And you don't know whether  
21 it's made available -- you don't know whether it's made  
22 available to them after it's filed either. Right?  
23 MR. GARMAN: Objection to the form of the  
24 question.  
25 A. Pardon me. Made available -- I'm sorry?

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1 Q. (BY MR. SHEEHAN) I'm sorry. You don't know  
 2 whether the Form 990 is made available to the members of  
 3 the board of directors after it was filed, Exhibit 1?  
 4 MR. GARMAN: Objection to the form of the  
 5 question.  
 6 A. I testified that I believe the 990 is always  
 7 made available to our board of directors at one of the  
 8 board -- at one of the board meetings.  
 9 Q. (BY MR. SHEEHAN) How was the 990 made  
 10 available to the board members at a board meeting for  
 11 2019?  
 12 A. I --  
 13 MR. GARMAN: Objection to the form.  
 14 Go ahead.  
 15 A. The way it is usually done, and I have not --  
 16 2020 has been such a crazy year because of COVID and all  
 17 that, that the way it's usually done is the general  
 18 counsel, the secretary makes an announcement that the  
 19 990s are available in -- in the back of the room for  
 20 board members to pick up and look at.  
 21 Q. (BY MR. SHEEHAN) Are the board members  
 22 permitted -- I'm sorry, go ahead.  
 23 A. To my recollection, that's the way it's  
 24 usually done.  
 25 Q. Okay. They're allowed to pick it up and look

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1 at it. Can they take it home?  
 2 A. I don't know the -- I don't know the answer to  
 3 that.  
 4 Q. Okay. Let's go to question 12a.  
 5 MR. SHEEHAN: Let's take a short break.  
 6 MR. GARMAN: Did you say a break,  
 7 Counsel?  
 8 MR. SHEEHAN: Actually, I think we can go  
 9 ahead. Well, we can go ahead. Let's do this.  
 10 Q. (BY MR. SHEEHAN) Can you tell me,  
 11 Mr. LaPierre, in the ordinary course, is that 990 made  
 12 available --  
 13 MR. GARMAN: Jim, we went off. Are we  
 14 back on?  
 15 THE VIDEOGRAPHER: Yes.  
 16 MR. GARMAN: Okay. We're back on. We  
 17 went off, but we're back on I guess.  
 18 MR. SHEEHAN: Okay. Thank you.  
 19 Q. (BY MR. SHEEHAN) Was the 990 made available  
 20 to the members of the board of directors before or after  
 21 it was filed?  
 22 MR. GARMAN: Objection to the form of the  
 23 question.  
 24 A. I'm not sure. I think it was made available  
 25 to them after it was filed.

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1 Q. (BY MR. SHEEHAN) Okay. Has any member of the  
 2 board of directors ever asked you any questions about  
 3 the 990s that have been filed by the NRA?  
 4 A. No, not that I -- not that I recall.  
 5 Q. Okay. Let's go to question 12a. All right.  
 6 Did the NRA have a written conflict of interest policy?  
 7 The box is checked yes. To your knowledge, is that  
 8 correct?  
 9 A. Yes, I believe that's correct.  
 10 Q. 12b, were officers, directors or trustees and  
 11 key employees required to disclose annually interests  
 12 that could give rise to conflicts? And that box is  
 13 checked yes. To your knowledge, is that correct?  
 14 A. Yeah.  
 15 Q. With respect to question 12C, did the  
 16 organization regularly and consistently monitor and  
 17 enforce compliance with the policy? The box is checked  
 18 yes. To your knowledge, was that correct at the time  
 19 for the year 2019?  
 20 A. Yes, it is. Part of the -- part of the  
 21 360-degree review of this organization, self-correction  
 22 and safety checks, look at everything to make sure NRA  
 23 is in complete compliance and improve anything that  
 24 needed to be improved.  
 25 In the past, I know that one of the things NRA

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1 improved on and worked on was to make sure that -- and  
 2 with the audit committee also and with the board, that  
 3 it updated and improved all of its -- all of its  
 4 policies in this area.  
 5 Q. So in your opinion, Mr. LaPierre, does the NRA  
 6 consistently and regularly enforce -- let me go back.  
 7 During 2019, did the NRA consistently -- let  
 8 me start again.  
 9 During 2019, did the organization regularly  
 10 and consistently monitor and enforce compliance with a  
 11 conflict of interest policy?  
 12 MR. GARMAN: Objection to the form of the  
 13 question.  
 14 You can answer.  
 15 A. I believe in 2019 the NRA -- the NRA did. The  
 16 NRA as part of its compliance reviews, its safety checks  
 17 and its complete desire to bring this organization -- to  
 18 not let anyone drag it off course, that the organization  
 19 was doing that in 2019.  
 20 Q. (BY MR. SHEEHAN) How about 2018?  
 21 MR. GARMAN: Objection to the form of the  
 22 question.  
 23 A. I --  
 24 Q. (BY MR. SHEEHAN) Go ahead, Mr. LaPierre.  
 25 A. I think it was an ongoing process of, as I

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1 Q. (BY MR. SHEEHAN) I'm sorry. You don't know  
 2 whether the Form 990 is made available to the members of  
 3 the board of directors after it was filed, Exhibit 1?  
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 7 made available to our board of directors at one of the  
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 14 back on?  
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 16 MR. GARMAN: Okay. We're back on. We  
 17 went off, but we're back on I guess.  
 18 MR. SHEEHAN: Okay. Thank you.  
 19 Q. (BY MR. SHEEHAN) Was the 990 made available  
 20 to the members of the board of directors before or after  
 21 it was filed?  
 22 MR. GARMAN: Objection to the form of the  
 23 question.  
 24 A. I'm not sure. I think it was made available  
 25 to them after it was filed.

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 8 correct?  
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 10 Q. 12b, were officers, directors or trustees and  
 11 key employees required to disclose annually interests  
 12 that could give rise to conflicts? And that box is  
 13 checked yes. To your knowledge, is that correct?  
 14 A. Yeah.  
 15 Q. With respect to question 12C, did the  
 16 organization regularly and consistently monitor and  
 17 enforce compliance with the policy? The box is checked  
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 19 for the year 2019?  
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 21 360-degree review of this organization, self-correction  
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 23 is in complete compliance and improve anything that  
 24 needed to be improved.  
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 18 not let anyone drag it off course, that the organization  
 19 was doing that in 2019.  
 20 Q. (BY MR. SHEEHAN) How about 2018?  
 21 MR. GARMAN: Objection to the form of the  
 22 question.  
 23 A. I --  
 24 Q. (BY MR. SHEEHAN) Go ahead, Mr. LaPierre.  
 25 A. I think it was an ongoing process of, as I

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1 said, that started in 2017, continued in 2018 robustly  
 2 all the way through 2018. And in 2019, I think that I  
 3 felt that the organization got to the point where we  
 4 were -- we were significantly improved any areas in  
 5 terms of safety checks or in terms of the compliance  
 6 that needed to be made more robust, increasingly made it  
 7 not -- made it -- made it to the point where we would be  
 8 able to pick up or check any -- any way that any of  
 9 these policies were being worked around or -- and that  
 10 by 2019, the organization -- in 2020, the organization  
 11 had -- had -- it had really corrected, self-corrected  
 12 and --

13 Q. Mr. LaPierre, this is a very specific question  
 14 on 11c. And let's go back to 2017. In 2017, did the  
 15 NRA, as the language states, regularly and consistently  
 16 monitor and enforce compliance with the conflict of  
 17 interest policy?

18 MR. GARMAN: Objection to the form of the  
 19 question, calls for a legal conclusion.

20 A. Are you -- are you talking prior to 2017?

21 Q. (BY MR. SHEEHAN) No, in 2017.

22 A. What I know about that I learned from -- I  
 23 learned from lawyers.

24 Q. But you were the head of the organization,  
 25 right? In 2017, was it your opinion that the NRA

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1 regularly and consistently monitored compliance with the  
 2 conflict of interest policy?

3 A. Yes, it was my --

4 MR. GARMAN: Hold on. Objection to the  
 5 form of the question. It still calls for a legal  
 6 conclusion.

7 Go ahead.

8 A. You know, it was my opinion that the NRA --  
 9 when we got into this whole effort of self-correction  
 10 after the Schneiderman call, I honestly felt like the  
 11 NRA wasn't doing anything wrong. I felt like we were in  
 12 compliance. I felt like we were -- we were, you know --  
 13 everything we were doing was in the best interest of the  
 14 NRA and the members that we serve.

15 And -- and -- but on the other hand, to the  
 16 extent -- we were self-checking everything, and as we  
 17 started checking everything, we found efforts that we  
 18 could improve on, and I believe one of one of the  
 19 efforts -- one of the areas where we worked on  
 20 improving.

21 Q. (BY MR. SHEEHAN) So do you believe that in  
 22 2017 that the NRA --

23 A. But I did not --

24 Q. I'm sorry.

25 A. I'm sorry, I didn't mean to interrupt you.

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1 Q. Did the NRA believe -- did you believe as of  
 2 the year 2017 that the NRA regularly and consistently  
 3 monitored and enforced compliance with the conflict of  
 4 interest policy?

5 A. I did.

6 MR. GARMAN: Objection to the form of the  
 7 question.

8 Go ahead.

9 A. I did.

10 Q. (BY MR. SHEEHAN) Thank you.  
 11 And for 2018 --

12 MR. GARMAN: Objection to the form of the  
 13 question.

14 Q. (BY MR. SHEEHAN) Okay. Mr. LaPierre, did  
 15 you believe in 2018 that the NRA regularly and  
 16 consistently -- I'm sorry, regularly and consistently  
 17 monitored and enforced compliance with the conflict of  
 18 interest policy?

19 A. I -- I did.

20 MR. SHEEHAN: Let's -- did you want to  
 21 take a break, sir? Is that what I was just hearing?

22 MR. GARMAN: Whenever it's a good spot,  
 23 yeah.

24 MR. SHEEHAN: Okay. Why don't we take  
 25 ten minutes at this point.

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1 THE VIDEOGRAPHER: We're going off the  
 2 record. The time on the video is 11:21 a m.  
 3 (Break from 11:21 a m. to 11:45 a m.)

4 THE VIDEOGRAPHER: We're back on the  
 5 record. The time on the video is 11:45 a m.

6 Q. (BY MR. SHEEHAN) Mr. LaPierre, if you look at  
 7 section b under part VI, you'll see question 15. Did  
 8 the process for determining compensation of the  
 9 following persons include a review and approval by  
 10 independent persons, comparability data and  
 11 contemporaneous substantiation and deliberation and  
 12 decision? And with respect to the organization's CEO,  
 13 it says yes.

14 To the best of your knowledge, is that answer  
 15 true, correct and complete?

16 A. Yes, I believe that's true, to the best of my  
 17 knowledge. They did -- the treasurer's office did that  
 18 with some of the legal counsel.

19 Q. And with respect to question 15b, other  
 20 officers or key employees of the organization, same  
 21 process?

22 A. Based on the -- based on the professional  
 23 advice of the people that prepared this that I relied  
 24 on, I believe they reviewed that.

25 Q. "They" meaning that for other officers and key

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1 employees --  
 2 A. The general --  
 3 Q. I'm sorry. Go ahead.  
 4 A. I'm sorry. The treasurer's office, the  
 5 general counsel, the -- the comp committee.  
 6 Q. Did you ever see any comparability data for  
 7 the employees that reported to you during 2019?  
 8 A. I did not see -- I did not see data that -- I  
 9 saw data of people like of my position in some of the  
 10 studies that I saw. I just -- I don't know that I saw  
 11 data on people reporting directly to me. I don't know I  
 12 saw --  
 13 Q. In your --  
 14 A. I didn't have a review of that.  
 15 Q. In your view, Mr. LaPierre, do the general  
 16 counsel and the treasurer of the NRA report to you?  
 17 A. They do, but they also -- I place a lot of  
 18 trust in them and they have a lot of independence also.  
 19 I tend to delegate --  
 20 Q. How -- I apologize. Go ahead.  
 21 A. I tend to delegate authority and -- and place  
 22 a lot of trust in people.  
 23 Q. Did you see any comparability data for the  
 24 salaries of your general counsel or of your treasurer?  
 25 MR. GARMAN: Objection to form.

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1 Go ahead.  
 2 A. I -- I did not, but I believe -- I believe  
 3 that there was data provided to the comp committee  
 4 that -- that worked on those salaries.  
 5 Q. (BY MR. SHEEHAN) Did you review comparability  
 6 data or -- let me rephrase that.  
 7 Did you review comparability data with respect  
 8 to Josh Powell's salary at any time?  
 9 A. I don't -- I don't think I did.  
 10 Q. Did you review comparability data with respect  
 11 to Mr. DeBergalis' salary at any time?  
 12 A. I believe the -- I believe we did. I worked  
 13 with the comp committee on that salary. We sat down, we  
 14 talked about it, and we thought that Mr. DeBergalis'  
 15 salary, given his responsibility, was appropriately  
 16 within the line of ranges of salaries for that position.  
 17 Q. Okay. I would like you now to look at part  
 18 VII of Exhibit 1. And on part VII, you'll see a series  
 19 of salaries and reportable -- I'm sorry, reportable  
 20 compensation from the NRA and other compensation. Do  
 21 you know on part VII whether the amount that is shown  
 22 for you reflects excess benefit payments to disqualified  
 23 persons reported elsewhere on the 990?  
 24 MR. GARMAN: Objection to the form of the  
 25 question.

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1 A. I don't know the answer to that.  
 2 Q. With respect --  
 3 A. I know that I paid -- I'm sorry.  
 4 Q. With respect to the amount shown for  
 5 Mr. Oliver North, it shows \$986,000 reportable  
 6 compensation with the organization. Is that statement  
 7 accurate?  
 8 MR. GARMAN: Objection to the form of the  
 9 question.  
 10 Go ahead.  
 11 A. You know, I trust the -- I trust the  
 12 treasurer's office and the tax professionals that  
 13 prepared that. I just -- with everything else I'm  
 14 doing, I don't get involved -- didn't get involved in  
 15 the preparation of this, and I trust the professionals  
 16 that prepared it.  
 17 Q. (BY MR. SHEEHAN) Didn't the bylaws --  
 18 A. I --  
 19 Q. (BY MR. SHEEHAN) Go ahead, Mr. LaPierre. I  
 20 apologize.  
 21 A. I believe that -- I believe that to be  
 22 accurate based on the professionals that prepared it.  
 23 Q. Didn't the bylaws of the NRA in 2019 forbid  
 24 compensation to the president of the NRA?  
 25 MR. GARMAN: Objection to the form of the

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1 question.  
 2 Go ahead.  
 3 A. Yes, and I believe that that -- this is my  
 4 belief. I didn't prepare this, but I assume that  
 5 compensation would be compensation that was in some way  
 6 related to what Ackerman McQueen paid Colonel North for  
 7 his work on the TV show that he did for NRATV, not  
 8 related to paying him for being president of the NRA.  
 9 Q. (BY MR. SHEEHAN) Do you know whether the  
 10 North compensation reflects the excess benefit payments  
 11 of disqualified persons reported on schedule L of the  
 12 990?  
 13 MR. GARMAN: Objection to the form of the  
 14 question.  
 15 A. I don't. I don't.  
 16 Q. (BY MR. SHEEHAN) Okay. And if I asked you  
 17 about the other people who are identified on -- you know  
 18 what? Let's go.  
 19 Mr. Phillips, if you look at Mr. Phillips,  
 20 number 9 on part VII, section A, it recites a payment  
 21 to him as a former officer of \$659,386. Do you know  
 22 what -- do you know if that compensation was accurate?  
 23 MR. GARMAN: Objection to the form of the  
 24 question.  
 25 A. I don't know whether that compensation -- that

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<p>1 is accurate.                  2 Q. (BY MR. SHEEHAN) Do you know why Mr. Phillips                  3 was paid 600 -- do you know why Mr. Phillips was paid                  4 several hundred thousand dollars in 2019 by the NRA?                  5 A. I don't.                  6 Q. Did he perform any services for the NRA in                  7 2019?                  8 A. I don't -- I don't know whether -- I don't                  9 know the answer to that. You would have to ask the                  10 treasurer.                  11 Q. Okay.                  12 A. I didn't work with him in 2019 --                  13 Q. Does Mr. Perrine still work for the NRA?                  14 A. No, he does not.                  15 Q. And when did he leave?                  16 A. I believe we -- when we furloughed people                  17 because of COVID, I believe -- I believe he was one of                  18 the furloughs we did.                  19 Q. All right. If you look -- so that would be in                  20 the spring or summer of 2020?                  21 A. I'm not positive about that, but I believe --                  22 I believe he was.                  23 Q. All right. If you look at Mr. Weaver, it                  24 shows \$240,000 in payments to Mr. Weaver on part VII of                  25 Form 990. What services did Mr. Weaver perform in 2019</p> <p style="text-align: right;">Page 90</p>	<p>1 Exhibit 1, part X, the balance sheet.                  2 MR. GARMAN: We're there now.                  3 Q. (BY MR. SHEEHAN) All right. Mr. LaPierre,                  4 you'll see it says zero on loans or other receivables                  5 from any current or former officer. Do you see that?                  6 A. I do.                  7 Q. Was that accurate as of the time this 990 was                  8 filed with the attorney general?                  9 MR. GARMAN: Objection to the form of the                  10 question.                  11 Go ahead.                  12 A. Again, based on the -- based on the legal                  13 people and the tax professionals and the treasurer's                  14 office that presented this, I -- I relied on their --                  15 their accuracy of that.                  16 Q. (BY MR. SHEEHAN) Can you take a look at                  17 question 27 on part X? And you'll see that for the end                  18 of the year 2019, that the net deficit -- that is the                  19 net asset deficit of the NRA is represented as                  20 49,641,823. To the best of your knowledge, is that                  21 number correct?                  22 MR. GARMAN: Objection to the form of the                  23 question.                  24 Go ahead.                  25 A. Yeah, based on the tax -- based on the</p> <p style="text-align: right;">Page 92</p>
<p>1 for the NRA?                  2 A. I think that payment was part of a severance                  3 agreement that we did with Mr. Weaver. Our general                  4 counsel worked on with Mr. Weaver back when we let him                  5 go.                  6 Q. Did he perform any services for the NRA in                  7 2019?                  8 A. No, I don't think -- I don't think -- yeah, I                  9 think it was part of a severance agreement.                  10 Q. Okay. If you look at section B of part VII,                  11 it recites Brewer, Attorneys &amp; Counselors for 2019,                  12 \$24,789,000. Is that correct?                  13 MR. GARMAN: Objection to the form of the                  14 question.                  15 A. Again, I'm not in the accounting office. I                  16 relied on -- rely on their preparation of this. And                  17 based on their figures and their -- I rely on their                  18 work. I believe it's probably correct. I believe it's                  19 correct.                  20 Q. (BY MR. SHEEHAN) Let's turn now to part X of                  21 Exhibit 1, and you'll see on question 5 it asks you for                  22 loans and other -- I'm sorry, go ahead.                  23 MR. GARMAN: Yeah, what page are you                  24 looking at?                  25 MR. SHEEHAN: I'm looking at page 11 of</p> <p style="text-align: right;">Page 91</p>	<p>1 treasurer's office who prepared this, I -- I believe                  2 that to be true. I'm also very proud of the turnaround                  3 that the NRA has accomplished in 2020, where in 2021                  4 where we have completely turned all those figures around                  5 and -- and put the NRA in a -- in a very solid financial                  6 position.                  7 Q. (BY MR. SHEEHAN) Do you know as of the end of                  8 2020 what the net asset -- the net assets without donor                  9 restrictions is at the NRA?                  10 MR. GARMAN: Objection to the form of the                  11 question.                  12 Go ahead.                  13 A. I'd -- I'd have to check with the treasurer's                  14 office. It's -- it's probably in the range of -- I'd be                  15 guessing. I'd have to check with the treasurer's                  16 office.                  17 Q. (BY MR. SHEEHAN) What is the basis for your                  18 belief --                  19 A. I think it was in the range of 250 to 300                  20 million, something like that.                  21 Q. 250 to 300 million in net assets?                  22 A. I -- again, I really need to check with --                  23 check with the treasurer's office for our budget.                  24 Q. But you told me you had completely turned it                  25 around in 2020.</p> <p style="text-align: right;">Page 93</p>

1 A. We did.  
 2 Q. What's the new number?  
 3 MR. GARMAN: Objection, asked and  
 4 answered.  
 5 A. We deleveraged the balance sheet in 2020 by  
 6 about \$40 million. The NRA was about 33 million to the  
 7 positive. We repaid the Foundation loan. We had a --  
 8 we had a -- thanks to our members. And even with COVID,  
 9 we are very proud of the fact that, not only did we do  
 10 all this self-correction and course correction and all  
 11 that that we talked about to be in compliance, we -- we  
 12 worked the organization which faced some real challenges  
 13 with what we were dealing with with New York state with  
 14 trying to break our -- with DFS trying to break our  
 15 banking and our financial relationships, with us with  
 16 legal fees we incurred, plus with some vendors that --  
 17 spending that we needed to reign in based on the fact  
 18 that we felt it wasn't producing results. We did all of  
 19 that.  
 20 And in 2019, we -- in 2020, we finished --  
 21 deleveraged by about \$40 million NRA's debt, and we  
 22 finished -- NRA finished about 33 million positive. And  
 23 then we repaid the Foundation loan on top of that. And  
 24 the organization -- put the organization in a very  
 25 strong position, a robust position to go forward with

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1 our safety and training and education and legislative  
 2 advocacy and all the things our members expect us to do.  
 3 Q. (BY MR. SHEEHAN) As --  
 4 A. With all the challenges we were faced with,  
 5 which -- and the bills that we had to pay as a result of  
 6 those challenges, and we -- we managed the association  
 7 through it, and we have put the foundation on very sound  
 8 financial footing as we sit here today.  
 9 Q. So if you're in such great financial footing,  
 10 why did you file for bankruptcy?  
 11 MR. GARMAN: Objection to the form of the  
 12 question.  
 13 A. You know, I'll tell you why. When General  
 14 Schneiderman made that call in 2017, we took it at face  
 15 value what he said about New York not-for-profit law and  
 16 about the fact that if we do a complete safety check,  
 17 self-correct, look at every employee, including me, look  
 18 at all the vendors, if you need to correct, correct. If  
 19 you do, there's a safe harbor provision in New York  
 20 state.  
 21 And -- and we felt very proud of that work  
 22 that we were doing in terms of improving this  
 23 organization. And when I -- when I came out of my  
 24 deposition, the one I did with the New York State AG's  
 25 Office, I felt like all there was was ill will towards

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1 this organization. I felt like there was no interest in  
 2 the self-improvement, the course correction, everything  
 3 we had done, all of that. It was just ill will toward  
 4 the organization.  
 5 And then in August, when the attorney general  
 6 filed those charges without any recognition of all the  
 7 work that had been done in terms of self-improving and  
 8 getting into compliance in -- by 2020 and a clean audit  
 9 in 2019 and everything that -- all the hard work and the  
 10 literal -- literally, all the grief I took for taking  
 11 NRA down the principle path, we concluded that New York  
 12 state was simply not a level playing field for the NRA,  
 13 that there's no way NRA could get a fair shake in New  
 14 York for our members, for our programs, for our  
 15 organization and for what our members and our bylaws and  
 16 our charter expect us to do.  
 17 And -- and so we -- you know, we talked for  
 18 years about getting out of New York state, but we hung  
 19 in there in '17. We hung in there in '18. We hung in  
 20 there in '19. We didn't try to escape the state of New  
 21 York because we honestly believed that all of our  
 22 self-correction and all of our 360-degree look and  
 23 compliance controls and the double safety checks on  
 24 compliance controls, that New York would pat us on the  
 25 back and say, Congratulations, that's what we expect a

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1 good nonprofit to do.  
 2 And instead, we got just the opposite. We got  
 3 an attorney general, we believe, filing charges based on  
 4 to fulfill a campaign promise that she had made that, if  
 5 elected to the AG, she considered the NRA a terrorist  
 6 criminal organization because we supported the Second  
 7 Amendment and she would launch an investigation. And we  
 8 felt that we simply were unable to get a fair shake in  
 9 New York. I felt that way when I walked out of my  
 10 deposition. And -- and I talked with the SLC about it,  
 11 the special litigation committee.  
 12 MR. GARMAN: Go ahead. Don't invade the  
 13 attorney/client privilege with your answer.  
 14 A. Anyway, by then, by 2020 we had all kinds of  
 15 states, based on watching what was going on with New  
 16 York state, calling us up saying you're welcome here,  
 17 we'd love to have you, we'd love to have you come to  
 18 West Virginia, come to Arkansas, come to South Dakota,  
 19 come to Texas. We had them offering incentives to the  
 20 organization to do it. We had them filing briefs on our  
 21 side in these legal cases. And we began to take very  
 22 seriously the idea of looking for a -- a new home where  
 23 we would have a fair, legal playing field, a fair  
 24 regulatory environment and a -- and where we could carry  
 25 out the missions and the programs of the NRA bylaws that

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1 our members expect us to. And --  
 2 Q. (BY MR. SHEEHAN) So is it fair to say that  
 3 you filed the bankruptcy not because you were bankrupt,  
 4 but because you wanted to accomplish the result of  
 5 reincorporating in Texas?  
 6 MR. GARMAN: Objection to the form of the  
 7 question.  
 8 A. We filed the bankruptcy ultimately because,  
 9 one, we felt it gave us a chance to reorganize the  
 10 organization. We felt it -- it would also give us the  
 11 chance to streamline a lot of the litigation costs in  
 12 terms of -- and we felt it would also -- we could ask  
 13 the federal judge for permission under the Chapter 11  
 14 bankruptcy law to reincorporate in a state that offered  
 15 a fair legal playing field to the NRA, that was not  
 16 weaponized government against the NRA, and improper use  
 17 of government against the NRA and where we could get a  
 18 fair shake. They wanted us there. They're offering us  
 19 financial incentives to go there. And we're -- we had  
 20 400,000 members, including our annual convention coming  
 21 up, and it would be -- it would be a -- a state where,  
 22 if the federal judge would allow us to reincorporate  
 23 there, would offer the NRA and our membership, our 5  
 24 million members -- or just under 5 million right now;  
 25 we're going to go over 5 million this year again -- a

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1 great place to be incorporated in, where we had a fair  
 2 regulatory legal environment and we could prosper.  
 3 Q. (BY MR. SHEEHAN) Thank you, Mr. LaPierre.  
 4 Turn now to page 50 of the Exhibit 1, which is  
 5 schedule B, which lists noncash property which are gifts  
 6 to the NRA from donors. And do you see that page,  
 7 page 50?  
 8 A. I do -- I do see it. I do see it.  
 9 Q. So look at entries 88 and 94, and you'll see  
 10 they're hunting trips essentially, one to Spain and one  
 11 to New Zealand. What does the NRA do with these gifts,  
 12 that is, the hunting trip gifts?  
 13 MR. GARMAN: Objection to form.  
 14 Go ahead and answer.  
 15 A. I don't know. You'd have to ask our -- our  
 16 professionals that prepared this, our treasurer's office  
 17 or our -- that prepared it. I could make a guess, but  
 18 it would be a guess.  
 19 MR. GARMAN: Don't guess. Don't guess.  
 20 Q. (BY MR. SHEEHAN) Is there any preclusion or  
 21 any rule at the NRA that officers and directors of the  
 22 NRA cannot use gifts to the NRA?  
 23 MR. GARMAN: Objection to form.  
 24 Go ahead.  
 25 A. I don't -- I don't know what these represent.

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1 As I said, you would have to ask the professionals who  
 2 prepared it. I simply don't know what they --  
 3 Q. (BY MR. SHEEHAN) Here is my question,  
 4 Mr. LaPierre. Is there any rule within the NRA that  
 5 says that officers and directors may not use gifts of  
 6 hunting trips to the NRA?  
 7 MR. GARMAN: Objection to form.  
 8 Go ahead.  
 9 A. Well, I assume that would be if it's not  
 10 related to NRA -- if it's not NRA's business. If it's  
 11 NRA's business, I think that's different.  
 12 Q. (BY MR. SHEEHAN) When you say NRA business,  
 13 so the stag hunt to New Zealand for two stags, how would  
 14 that be NRA business?  
 15 MR. GARMAN: Objection, misstates his  
 16 testimony.  
 17 A. Well, that's what I'm saying. I don't know  
 18 what that is, but you would have to ask the preparer.  
 19 Q. (BY MR. SHEEHAN) No, my question was is there  
 20 any policy within the NRA governing the use of gifts of  
 21 hunting trips to the NRA?  
 22 MR. GARMAN: Object to form.  
 23 Q. (BY MR. SHEEHAN) And do you know the answer  
 24 to that question?  
 25 A. I think there's a policy that it would -- that

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1 a gift of a hunting trip would -- to the -- I'm not  
 2 aware of what the NRA's policy is on hunting trips. And  
 3 I assume they would be in relation to NRA business, so I  
 4 just -- I just don't know.  
 5 Q. Has any person who works at the NRA ever taken  
 6 one of these gift trips for hunting that are listed on  
 7 Exhibit -- I'm sorry -- on schedule B of the IRS 990?  
 8 MR. GARMAN: Objection to form. Counsel,  
 9 we've only looked at the one page. Do you want me to  
 10 have him look at more of the return?  
 11 MR. SHEEHAN: No. Okay. Let's keep  
 12 going. Sorry.  
 13 Q. (BY MR. SHEEHAN) You'll see on page 51 that  
 14 there are a variety of rifles which were given to the  
 15 NRA as gifts. What disposition does the IRS -- the  
 16 IRS -- the NRA make of gifts of weapons to the NRA?  
 17 MR. GARMAN: Objection to form.  
 18 Go ahead.  
 19 A. To the best of my knowledge, some are donated  
 20 to the NRA museum. The NRA museum evaluates them as to  
 21 whether they are worthy to be displayed. I think  
 22 it's -- I believe, to the best of my knowledge, that  
 23 we're based on agreements with the donors that if -- if  
 24 some of them are not worthy to be displayed, the NRA  
 25 museum is able -- I believe -- I'm not positive -- is

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1 able to sell some of those that they -- that are not  
2 worthy of display that were given by donors. Other  
3 firearms are used in fundraisers that may be done by the  
4 Institute For Legislative Action, may be done by the NRA  
5 Foundation, may be done by -- donated by the Women's  
6 Leadership Forum or some of those where they do auctions  
7 and things like that, I believe.  
8 Q. (BY MR. SHEEHAN) Where would I find the  
9 records relating to these gifts, that is the gifts that  
10 are listed on schedule B that are not money?  
11 A. You'd have -- you'd have to go to the  
12 treasurer's office and the tax preparers that -- that  
13 could point you in the direction of where you can find  
14 the records.  
15 Q. Thank you. Let's move on.  
16 Did the NRA ever borrow money from the ILA?  
17 A. It's one corporation. So the idea of the NRA  
18 borrowing money is kind of -- it's not really real.  
19 It -- the NRA at one point -- I am talking about C4  
20 money now; I am not talking about PAC money or anything  
21 of that.  
22 But at one point, the NRA transferred, I  
23 think, 2 or 3 million from ILA to the NRA, and then --  
24 but, again, it's one -- one corporation, so --  
25 Q. Let me try this, Mr. LaPierre. So you're

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1 saying that the money which was transferred from the ILA  
2 to the NRA was not PAC money. Is that correct?  
3 A. Oh, absolutely not.  
4 Q. Okay. Then we're good.  
5 Are you there, Mr. LaPierre?  
6 A. Yes, sir.  
7 Q. Okay. You'll see in question 1a it asks a  
8 series of questions regarding compensation. And the --  
9 it says in 1a, asks you to check the appropriate boxes  
10 if the organization provided any of the following to or  
11 for a person listed on Form 990, part VII.  
12 MR. GARMAN: Counsel -- Counsel, we're  
13 not sure where you're at.  
14 Q. (BY MR. SHEEHAN) I'm sorry. So if you look  
15 at schedule A, which is page -- schedule J, which is  
16 page 77 of the IRS 990 --  
17 MR. GARMAN: Hold on.  
18 MR. SHEEHAN: We're looking at question  
19 1a on that schedule.  
20 MR. GARMAN: All right. We see it. Hold  
21 on.  
22 Okay. Go ahead.  
23 Q. (BY MR. SHEEHAN) Question 1a asks the  
24 organization if they provided any of the following for a  
25 person listed on Form 990, part VII.

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1 So let's start just with you. During 2019,  
2 did you get first-class or charter travel from the NRA?  
3 A. I received -- yes, the NRA security requires  
4 that I travel private.  
5 Q. All right. All the time?  
6 A. All the time.  
7 Q. All right.  
8 A. Whether personal or business.  
9 Q. Did you receive travel for companions during  
10 2019?  
11 A. Yes.  
12 Q. And what companions were they?  
13 A. Well, my wife is chairman of the Women's -- is  
14 volunteer chairman of the Women's Leadership Forum,  
15 which raises millions for the National Rifle Association  
16 every year, and she -- it was her idea. She came up  
17 with the idea --  
18 Q. The question, Mr. LaPierre, is who -- what  
19 companions travels with you, the names of those people?  
20 A. Well, my wife, Susan LaPierre. And then we  
21 picked up -- I believe in 2019 -- 2019? I'd have to go  
22 back and check in 2019. I may have -- there may have  
23 been a trip or two that involved picking up or dropping  
24 off Colleen Sterner or Sienna Sterner. And -- and other  
25 companions, there may have been some trips where some

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1 NRA staff members traveled with me. I'd have to go back  
2 and check that.  
3 Q. Didn't -- in 2019, did any --  
4 A. Go ahead.  
5 Q. -- family members join you in the Bahamas?  
6 MR. GARMAN: Objection to form.  
7 A. In 2019?  
8 Q. (BY MR. SHEEHAN) Yes, please.  
9 A. No.  
10 Q. Okay. You'll see in question b, it asks if  
11 any of the boxes on line 1a are checked, did the  
12 organization follow a written policy regarding payment  
13 or reimbursement or provision of all the expenses  
14 described above? And you'll see the answer is no.  
15 Do you see that?  
16 A. I'm sorry. I'm sorry, where are you --  
17 Q. I'm looking at answer to 1b.  
18 A. Regarding -- (witness reading to himself.) If  
19 no, complete part to explain.  
20 MR. GARMAN: Speak up.  
21 A. Yeah, I see that question.  
22 Q. (BY MR. SHEEHAN) Okay. And you'll see the  
23 answer is checked no. Do you see that?  
24 A. I do.  
25 Q. Was it true -- was it true that in 2019 there

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1 was no written policy regarding first-class or charter  
2 travel for you?  
3 A. I think my -- my line was dictated by the  
4 security -- by the security office. You'd have to check  
5 with them to see if they had a written policy. I  
6 followed the direction of our -- our director of  
7 security and our security office.  
8 Q. Okay. But --  
9 A. Again, this is -- this is one of the things,  
10 though, that the NRA -- as the NRA continues to improve  
11 and self-correct, NRA is getting everything --  
12 everything lined up the right way and self-correcting  
13 everything and --  
14 Q. Mr. LaPierre, the question -- the question was  
15 did the NRA have a written policy? And as I understand,  
16 is your answer no?  
17 MR. GARMAN: He just answered yes.  
18 A. I answered yes, NRA had a written policy, but  
19 I was following the policy of our director of security  
20 and our security office.  
21 Q. (BY MR. SHEEHAN) So this question -- your  
22 answer -- the answer of the NRA on 1b that says no is  
23 false?  
24 MR. GARMAN: No, that is not what he  
25 said. Objection to form.

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1 MR. SHEEHAN: You're testifying now.  
2 Q. (BY MR. SHEEHAN) Mr. LaPierre, is the answer  
3 to 1b true or false?  
4 MR. GARMAN: I don't understand the  
5 question. Objection to form.  
6 Go ahead and answer if you understand it.  
7 A. I mean, I think the people that filled out  
8 this form prepared it accurately, and --  
9 Q. (BY MR. SHEEHAN) So to the best of your  
10 knowledge -- and, you know, I hear what sounds like  
11 coaching in the background. To the best of your  
12 knowledge --  
13 MR. GARMAN: No, no. Counsel, that was  
14 Mr. LaPierre talking to himself. He's reading the  
15 question. He's coaching himself.  
16 MR. SHEEHAN: Sorry. Okay. Okay. Got  
17 it.  
18 A. I assume that answer -- I believe that answer  
19 is accurate.  
20 Q. (BY MR. SHEEHAN) Okay.  
21 A. It's one of the areas I'm sure the NRA is --  
22 is self-correcting on.  
23 Q. Was there --  
24 A. Or have self-corrected on.  
25 Q. I'm sorry.

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1 Was there a written policy prior to 2019 with  
2 respect to first-class or charter travel?  
3 A. I believe -- I believe there was.  
4 Q. And so what happened to that policy in 2019?  
5 MR. GARMAN: Objection to form.  
6 A. I believe that as the -- as the NRA continued  
7 to do these safety checks and self-improvement and  
8 self-correction, I believe NRA caught -- caught --  
9 probably caught some areas where it needed to improve  
10 on. And every effort throughout this entire building  
11 has been if there are any areas we need to improve on,  
12 we're going to improve on. And this, I'm sure, was one  
13 of them.  
14 Q. (BY MR. SHEEHAN) What was Mr. Staples  
15 background before he became the security director of the  
16 NRA?  
17 A. He had an extensive law enforcement background  
18 up in Massachusetts.  
19 Q. What did he do in Massachusetts?  
20 MR. GARMAN: Objection to form.  
21 Go ahead.  
22 A. He -- he was in numerous areas of police law  
23 enforcement capacities up there.  
24 Q. (BY MR. SHEEHAN) Like what?  
25 A. I'd -- it's been so long since I looked at his

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1 résumé. I would have to go back and look at it again.  
2 Q. Did he have any experience with running a  
3 security detail before he joined the NRA?  
4 MR. GARMAN: Objection to form.  
5 Go ahead.  
6 A. I can't remember what -- it's been so long, I  
7 can't remember what his background was. I know he was  
8 highly respected. He had a great record up there in law  
9 enforcement in Massachusetts, and he seemed to be a --  
10 he seemed to be a great pick for director of security.  
11 Q. (BY MR. SHEEHAN) Did you pick him?  
12 A. He was recommended by a whole number of  
13 people. I can't remember who they all were.  
14 Q. The question is did you pick him?  
15 A. I don't think I specifically picked him. I  
16 think he was suggested by a number of people, and I  
17 talked to him and interviewed him and liked him and  
18 thought he was qualified.  
19 Q. So you made the decision to hire him?  
20 A. I believe I did.  
21 Q. All right. What law enforcement agencies did  
22 he work for in Massachusetts?  
23 MR. GARMAN: Objection to form, asked and  
24 answered.  
25 A. Again, it's been so many years now. I can't

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1 remember his résumé. It may have been the state police.  
 2 It may have been the Boston police or one of the  
 3 suburbs. He was in a number of different capacities.  
 4 Q. (BY MR. SHEEHAN) Did he ever work as a  
 5 bouncer?  
 6 A. I have no idea.  
 7 Q. Let's go to question 2 on page 77, which is  
 8 schedule J. Did the organization require substantiation  
 9 prior to reimbursing or allowing expenses incurred by  
 10 all directors, trustees and officers, including the  
 11 CEO/executive director, regarding first-class or charter  
 12 travel. You'll see the box checked is no. Is that  
 13 answer accurate as of 2019?  
 14 MR. GARMAN: Objection, form.  
 15 Go ahead and answer.  
 16 A. I believe, based on -- based on the confidence  
 17 in the people that prepared that, that the answer is  
 18 accurate. And it -- again, one of the reasons I was  
 19 proud to sign this form is I think it reflects all the  
 20 areas where the NRA is self-corrected and attempted to  
 21 improve and doing a complete check on the entire  
 22 organization to the point -- to the point where we are  
 23 in complete compliance with all the NRA rules,  
 24 guidelines, policies, procedures, make sure they're  
 25 robust and we're in complete compliance with

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1 not-for-profit law.  
 2 So what you're seeing here is a lot of the  
 3 self-correction that was turning up as we go through --  
 4 as NRA went through all this, which we are coming out of  
 5 the other end of that funnel right now with a stronger  
 6 organization, a better organization, a better -- with  
 7 better controls and -- and better people, to tell you  
 8 the truth --  
 9 Q. (BY MR. SHEEHAN) Let's go back to my  
 10 question, Mr. LaPierre. What I asked you was did the  
 11 organization -- is the answer correct to number 2, that  
 12 the organization did not require substantiation prior to  
 13 reimbursing or allowing expenses that you incurred with  
 14 respect to first-class or charter travel and travel  
 15 companions?  
 16 A. Are you talking about all employees, or are  
 17 you talking about me specifically?  
 18 Q. You. I'm talking about you.  
 19 A. Well, the NRA -- I traveled under the NRA  
 20 security policy, and -- and that's what I traveled on,  
 21 and those -- those bills all came in to the NRA.  
 22 Q. So where do I find that policy, the security  
 23 policy that you've described?  
 24 A. You'd have to check with Jim Staples and our  
 25 director of security. There is also a security

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1 committee of the board of directors, too.  
 2 Q. Is that where I would find the written policy,  
 3 the security committee of the board of directors?  
 4 MR. GARMAN: Objection to form.  
 5 A. As I said, you would have to ask Mr. Staples.  
 6 Q. (BY MR. SHEEHAN) Did you submit  
 7 substantiation for your -- contemporaneous  
 8 substantiation for your flights in 2019?  
 9 MR. GARMAN: Objection to form.  
 10 Go ahead and answer.  
 11 A. I submitted -- unless -- yes, I mean, NRA has  
 12 the bills on -- on my flights in -- in 2019.  
 13 Q. (BY MR. SHEEHAN) In addition to the bills,  
 14 what substantiation did they have for the purpose of the  
 15 flights and the need for the flights?  
 16 MR. GARMAN: Objection to the form of the  
 17 question.  
 18 A. Well, when I filled out my expense accounts, I  
 19 would -- I would put the purpose on expense accounts.  
 20 MR. GARMAN: Counsel, I think you're on  
 21 mute.  
 22 MR. SHEEHAN: I'm sorry.  
 23 Q. (BY MR. SHEEHAN) Did you do that with respect  
 24 to the flights that the NRA paid for? You would put in  
 25 an expense account justification during 2019?

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1 A. Yeah, like if I went off to speak to the  
 2 Rosewood Friends of the NRA banquet in Oregon, I would  
 3 put that on there. If I went to the SHOT Show in 2019,  
 4 I went there. If I went down to meet with a donor, I  
 5 would put that there, yeah.  
 6 Q. Now I would like to go to part III of schedule  
 7 J, and if you look at the -- this is on page 80 of the  
 8 IRS 990. It recites at the first box, Charter travel  
 9 was used on occasions when travel logistics or security  
 10 concerns precluded other available options.  
 11 But as I understand your earlier statement,  
 12 all of your travel was by charter flight. Is that  
 13 correct?  
 14 A. That is the NRA's policy. The NRA security  
 15 policy was because of the threat level that -- and the  
 16 harassment level that they monitor on a daily basis,  
 17 that I needed to travel private, whether it was business  
 18 or personal.  
 19 Q. How do you know that was the policy of the  
 20 NRA?  
 21 A. Because the security office told me that.  
 22 Q. Who in the security office told you that?  
 23 A. Jim Staples --  
 24 Q. When did he tell you that?  
 25 A. -- the director of security.

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1 Q. When did he tell you that?  
2 A. Over and over and over again, the last ten --  
3 however years he's been there, 12 years, whatever. I  
4 mean, he was adamant about it based on what he was  
5 seeing in terms of the harassment and the threats.  
6 Q. All right. Now I would like you to go to  
7 schedule L?  
8 MR. GARMAN: Counsel, can we get a page  
9 reference?  
10 MR. SHEEHAN: 82.  
11 Q. (BY MR. SHEEHAN) And it goes, of course,  
12 through page 87.  
13 MR. GARMAN: Do you want us to review  
14 them all or --  
15 Q. (BY MR. SHEEHAN) I want you to be familiar  
16 with the form. You will see on page 1 -- page 1 of  
17 schedule L, which is page 82 of the Exhibit 1, you'll  
18 see a series of excess benefit transactions, correct, on  
19 part I?  
20 A. Yes, I see that.  
21 Q. All right. Were these -- what can you tell me  
22 about these excess benefit transactions? You know what?  
23 Let me drop that question.  
24 Do you agree that each of these officers  
25 received excess benefit transactions?

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1 MR. GARMAN: Objection to form.  
2 Go ahead.  
3 A. You would -- on some of them, you would need  
4 to ask the treasurer's office, or some of it I think  
5 is -- is information that is with -- with the attorneys  
6 right now.  
7 I am aware that Josh Powell repaid the  
8 organization for -- for some excess benefit, but  
9 apparently -- I didn't prepare this. Apparently, it's  
10 not all -- it looks to me like it's not all corrected.  
11 I'm aware of myself, what I did. I mean, I  
12 got -- as part of what I initiated in 2017 looking at  
13 every employee, they looked at me too. And I didn't  
14 know it at the time, but it turns out that some of my  
15 travel, when I was traveling with my wife or my wife's  
16 travel or Women's Leadership employee Colleen Sterner or  
17 her daughter, if I picked them up and dropped them off  
18 to do Women's Leadership business or something like that  
19 or there were one or two other ones that they caught,  
20 that they saw, that they felt that should have been part  
21 of compensation. And they brought it to my attention,  
22 and I immediately offered to repay it, and I repaid it  
23 all with interest and then repaid the penalty to the  
24 IRS.  
25 So that's what happened with mine. We -- I

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1 wasn't aware of it at the time. If I -- it would have  
2 been a lot easier if going back years ago the NRA caught  
3 it and I could have paid it at the time, as opposed to  
4 it adding up to a number of years. But when they  
5 brought it to my attention, the right thing to do was to  
6 settle it up, and I paid it and caught it up.  
7 Q. (BY MR. SHEEHAN) Who negotiated on behalf of  
8 the NRA with you to determine how much you should pay  
9 back?  
10 MR. GARMAN: Objection to form.  
11 A. I had -- I had nothing to do with it at all.  
12 It was done by outside tax counsel. It was done by  
13 outside tax counsel.  
14 Q. (BY MR. SHEEHAN) So I'm just -- when you say  
15 it was done by outside tax counsel, the outside tax  
16 counsel determined how much money was due the NRA. Is  
17 that correct?  
18 A. That's correct. I -- I had nothing to do with  
19 it. I was be given a figure after they went through all  
20 the calculations.  
21 Q. So they didn't even talk to you about these  
22 charges. Correct?  
23 MR. GARMAN: Objection to form.  
24 A. The only thing that I was talked to about was  
25 the purpose of the trips in terms of why -- why I took

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1 them and why my wife might have gone along or why we  
2 would have picked up or dropped off the Sterners --  
3 Q. (BY MR. SHEEHAN) Who --  
4 A. -- and we talked about that. I didn't have  
5 anything to do with the calculations.  
6 Q. So who was the tax counsel who made the  
7 calculation?  
8 A. I believe it was done by the firm with Don Lan  
9 and -- Don Lan, and there was another firm Cheney, I  
10 believe, that worked on it.  
11 Q. Cheney, like the vice president?  
12 A. Yes, but I believe Don Lan was probably the  
13 one most involved, his firm.  
14 Q. So who at the NRA, apart from you, reviewed  
15 Mr. Lan's review to make sure it was accurate and  
16 complete?  
17 A. I was -- it was presented to me after -- after  
18 it was -- I think it was also reviewed by our general  
19 counsel in terms of the work, and then it was presented  
20 to me that this would settle it up, and I agreed to  
21 write the check to settle it up, with interest.  
22 Q. So Mr. Frazer reviewed the calculations of the  
23 outside counsel -- or the tax counsel Mr. Lan. Is that  
24 correct?  
25 A. I'm not sure about that. I remember talking

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1 with John about it, but I don't know whether he reviewed  
2 every bit of work done by Mr. Lan.  
3 Q. Did Mr. Spray review the payments to determine  
4 whether they were properly accrued and charged?  
5 A. I don't know the answer to that.  
6 Q. Did any member of the board know about the  
7 information contained on schedule L with respect to the  
8 payments that you repaid?  
9 A. I know the audit committee did.  
10 Q. The entire audit committee?  
11 A. Yes.  
12 Q. Was it brought before the audit committee --  
13 was the fact of the overpayment to you, which was going  
14 to be recovered, brought to the audit committee in the  
15 fall of 2020?  
16 MR. GARMAN: Objection to form.  
17 Go ahead.  
18 A. I -- yes, I believe it was.  
19 Q. (BY MR. SHEEHAN) And what's the basis for  
20 that belief?  
21 A. That the audit committee was heavily involved  
22 with every single thing going on in terms of the course  
23 correction and in terms of the -- of the safety checks  
24 involving everything in the organization at that time --  
25 was being brought before the audit committee by then.  
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1 Q. So this would be -- this discussion of the  
2 repayment by you should be in the audit committee  
3 minutes. Correct?  
4 MR. GARMAN: Objection to the form of the  
5 question.  
6 A. I don't know whether they did it in executive  
7 session or whether they did minutes, but I don't know  
8 the answer. You'll have to ask the audit committee.  
9 Q. (BY MR. SHEEHAN) Did any member of the board  
10 say how come Mr. LaPierre got \$300,000 that he wasn't  
11 entitled to from the NRA and it wasn't picked up for  
12 five years?  
13 MR. GARMAN: Objection to the form of the  
14 question.  
15 A. A lot of them knew that what a lot of this  
16 involved was Women's Leadership foreign travel on the  
17 part of my wife, also Colleen, who is a Women's  
18 Leadership employee -- Women's Leadership Forum  
19 employee, that it involved that. And a lot of the board  
20 members were aware of that, and they were aware that --  
21 what happened and how it was discovered that -- that we  
22 should not -- I did not know at the time, that it should  
23 have been listed as compensation, and that's why it was  
24 there and that's why it was repaid. A lot of members of  
25 the board knew that.  
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1 Q. (BY MR. SHEEHAN) How do you know that? How  
2 do you know a lot of the board members know that you  
3 received those payments?  
4 MR. GARMAN: Objection to the form.  
5 A. I mean, how did they know I received the  
6 repayment was the 990. I did the repayment with the  
7 990. And then I -- I had discussions with, you know,  
8 many members of the board as to what most of it was in  
9 relation to.  
10 Q. (BY MR. SHEEHAN) What members of the board  
11 did you have the conversation with?  
12 A. I think I talked to Sandy Froman about it. I  
13 think I maybe talked to Barbara Rumpel about it. I  
14 think I talked to -- I can't remember all of them by  
15 name, but I know I had, you know -- several of them  
16 brought it up and we talked about it, and they were, you  
17 know -- I mean, they actually, based on the fact that  
18 Susan was a volunteer and based on Women's Leadership  
19 Forum, they actually were kind of shaking their heads  
20 that I ended up having to repay all this, given the  
21 millions and millions of dollars that the Women's  
22 Leadership Forum raises every year with my wife being a  
23 complete volunteer since 2006. So a lot of them just  
24 kind of shook their head about the whole thing.  
25 Q. So Sandy Froman. Did you tell Carolyn Meadows  
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1 about the requirement that you repay the \$300,000?  
2 A. Yeah, she knew about it. All the officers  
3 knew about it.  
4 Q. When -- when did you tell the officers?  
5 MR. GARMAN: Objection to form.  
6 Go ahead.  
7 A. I think the officers were told about the same  
8 time it was happening.  
9 Q. (BY MR. SHEEHAN) Meaning that when the 990  
10 was filed in November of 2020?  
11 A. I believe so, yeah.  
12 Q. When did the NRA start looking at your flight  
13 information to determine what amounts should be repaid  
14 to the NRA?  
15 MR. GARMAN: Objection to form.  
16 Go ahead.  
17 A. I think as part of the review of all of these  
18 safety -- in this course that we started down in 2017,  
19 2018, 2019, 2020, which is a continual process of  
20 controls, making sure all controls are complied with,  
21 making sure all policies are complied with, making sure  
22 that everything this organization does is in compliance  
23 with NRA policies, NRA control and with nonprofit law.  
24 And I think this was turned up as part of -- I said they  
25 checked every employee, including me. This was turned  
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1 up, and part of the check they did included me.  
2 Q. (BY MR. SHEEHAN) Wasn't this after the  
3 attorney general of New York filed her complaint in  
4 August of 2020 that this review occurred with respect to  
5 the flights?  
6 MR. GARMAN: Objection to form.  
7 A. I think that that is probably accurate.  
8 Q. Okay. And wasn't the attorney general's  
9 complaint the precipitating factor. You know what?  
10 Skip that.  
11 When -- when the auditors spoke to the audit  
12 committee in October of 2020 about the IRS 990, had the  
13 990 that they reviewed contained the information on  
14 schedule L, the draft?  
15 A. I have no idea.  
16 Q. So let's turn to page 86.  
17 A. You know, again as I said, this was one of the  
18 reasons I was proud to sign this. It reflects all the  
19 self-correction that the NRA has done from top to bottom  
20 all the way through this organization, which is an  
21 ongoing, continuing process now and is a way of life now  
22 around this association. I mean, it -- this is a  
23 positive story, not a negative story, in terms of the  
24 organization being willing to go down a difficult path,  
25 which is to take a look at everything and self-correct  
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1 and impose controls -- make sure controls are complied  
2 with and do additional checks to make sure that if there  
3 were controls, they were as robust as they could  
4 possibly could be.  
5 Q. So let's --  
6 A. It was a positive --  
7 Q. Let's take a look at -- I didn't ask you was  
8 it was positive or negative. But take a look at  
9 schedule L and the language from Mr. Christopher Cox.  
10 Do you see that, the third from the top on page 86?  
11 A. Yeah, I see that.  
12 Q. It says, Mr. Cox caused expenses to be paid by  
13 the NRA or reimbursed to him for personal and family  
14 travel.  
15 Did the NRA make any calculation of what those  
16 costs were?  
17 A. You know, I -- Mr. Sheehan, I'm simply not  
18 aware of -- of any of what all that entails. That is a  
19 matter that is involved in litigation, in mediation, and  
20 it is -- it is being handled by all the attorneys, and I  
21 am just not in the middle of it or the person to comment  
22 on it.  
23 Q. All right. Then let's go to the -- take us to  
24 sporting events -- sporting and entertainment events.  
25 The statement here is that Mr. Cox had unapproved  
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1 charges for those activities. Do you see that?  
2 A. Yeah. And all of that, I'm just -- I'm just  
3 not -- again, it's a matter of litigation, of mediation,  
4 and I'm just not in the middle of any of it.  
5 Q. Did you receive -- did you yourself receive  
6 tickets to sporting or entertainment events that were  
7 paid for by the NRA during the time that you've been the  
8 executive VP of the NRA?  
9 A. Chris let me -- let me use his tickets,  
10 although I thought they were his personal tickets.  
11 Q. So you used tickets that were paid for by  
12 Mr. Cox and charged to the NRA and --  
13 A. I didn't know that. I thought they -- he made  
14 it very clear to me --  
15 MR. GARMAN: Let him finish. Let him  
16 finish.  
17 THE WITNESS: Okay.  
18 MR. GARMAN: Let him finish. Go ahead.  
19 Q. (BY MR. SHEEHAN) I'm a little confused now.  
20 The -- you used tickets from Mr. Cox which were paid for  
21 by the NRA, is that correct, for sporting and  
22 entertainment events?  
23 MR. GARMAN: Objection to form.  
24 Go ahead.  
25 A. What Chris always told me is they were his  
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1 personal tickets, that he had had them forever, he had  
2 signed up like when the Wizards first started offering  
3 tickets and he had been -- you know, and he would  
4 occasionally say, Hey, would you like to use the tickets  
5 to a game? And I would -- I thought they were his  
6 personal tickets. I had no idea they were paid for by  
7 the NRA.  
8 Q. (BY MR. SHEEHAN) So now you know they were  
9 paid for by the NRA. Correct?  
10 MR. GARMAN: Objection to form.  
11 A. I do now as a result of the fact that's one of  
12 the things I heard in relation to the legal  
13 investigation that's going on with Mr. Cox.  
14 Q. (BY MR. SHEEHAN) So have you paid back the  
15 tickets at this point that you used that Mr. Cox gave  
16 you?  
17 MR. GARMAN: Objection to form.  
18 Go ahead.  
19 A. No. No, I haven't. I didn't know they were  
20 NRA tickets. I didn't know --  
21 Q. (BY MR. SHEEHAN) But now you do. Now you do.  
22 Are you going to pay them back?  
23 MR. GARMAN: Objection. Counsel, you're  
24 being argumentative now.  
25 Q. (BY MR. SHEEHAN) I'm asking are you going to  
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1 pay them back?  
2 MR. GARMAN: Objection to form. There's  
3 no obligation -- it's the subject of litigation.  
4 They're trying to recover it from Mr. Cox. If Mr. Cox  
5 pays it --  
6 MR. SHEEHAN: This sounds like testimony,  
7 Counsel.  
8 MR. GARMAN: Well, you're being  
9 argumentative.  
10 Q. (BY MR. SHEEHAN) It's a simple question. Are  
11 you going to pay back the tickets you got from Chris Cox  
12 that the NRA paid for?  
13 MR. GARMAN: Objection to the form of the  
14 question.  
15 A. I don't -- I didn't use them very often. I  
16 mean, it happened a couple of times. I mean, if the NRA  
17 comes up with some calculation from -- or he kept a  
18 record or something on the couple of times I happened to  
19 use Chris's hockey tickets, I wouldn't have any problem  
20 paying it back. I mean, as I said, Chris told me they  
21 were his personal tickets. He was like, Hey, you know,  
22 would you like them for this game? I was usually on the  
23 road, to tell you the truth. I was never around here,  
24 so I didn't have time to go to sporting events. But,  
25 you know, if they determine that, I would have no

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[REDACTED]  
4 Q. But Mr. Cox has been gone for a couple years.  
5 Right?  
6 A. Well, he's been gone for, I think, since  
7 think, 2019.  
8 Q. Right.  
[REDACTED]

1 problem paying back the couple of times I happened to  
2 use his tickets.  
[REDACTED]

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[REDACTED]  
18 Q. (BY MR. SHEEHAN) How did they communicate  
19 they were upset to you?  
20 A. They -- they told me it was a really bad idea.  
21 Q. Who told you that?  
22 A. Mr. Staples.  
23 Q. Okay. Do you know how the people who are  
24 listed on part V of schedule L were selected for review?  
25 MR. GARMAN: Objection to form.

1 Go ahead and answer, if you can. If you need  
2 the time to go through --  
3 A. Section L --  
4 Q. (BY MR. SHEEHAN) Schedule L, part V, lists  
5 out one, two, three, four, five, six, seven, eight,  
6 nine, ten people. Do you know how the NRA selected  
7 their particular excess reimbursements for review?  
8 MR. GARMAN: So just for clarity, here is  
9 schedule L. We're on a screen that can only show part  
10 of it. Schedule L has a list of names on the left-hand  
11 side. I believe he is referring to the identity of the  
12 names that fall in this first column on the left.  
13 A. I don't know how they were selected.  
14 Q. (BY MR. SHEEHAN) Okay. But if we look  
15 through this, the NRA has a dispute with Joshua Powell.  
16 Isn't that correct, at the current time?  
17 MR. GARMAN: Your Honor -- I'm sorry.  
18 Counsel, are you referring to -- it's on video -- bad  
19 habit. Are you referring to a particular portion of the  
20 document right now.  
21 MR. SHEEHAN: No. I'm asking him more  
22 generally.  
23 Q. (BY MR. SHEEHAN) Does the NRA currently have  
24 a dispute with Mr. Josh Powell about excess benefit  
25 transactions?

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1 A. I know that -- you would really need to ask  
2 the attorneys on that. I know that Josh Powell has paid  
3 back -- has written a check to the NRA for a substantial  
4 amount. I don't know what the outstanding legal issues  
5 are with Josh Powell that the NRA has.  
6 Q. Okay. So if I look at Mr. Wilson Phillips, do  
7 you know why there was no review of his credit card  
8 charges for purposes of preparing schedule L?  
9 MR. GARMAN: Objection to the form of the  
10 question.  
11 A. I have no idea.  
12 Q. (BY MR. SHEEHAN) Okay. With respect to  
13 Oliver North, do you know why his payments were selected  
14 for review?  
15 A. I don't.  
16 Q. With respect to board member travel, do you  
17 know why -- which board members were selected for  
18 review?  
19 A. I don't. I didn't do the selection. I don't  
20 know.  
21 Q. Who did the selection?  
22 MR. CORRELL: Objection to the extent  
23 that it calls for him to reveal any attorney/client  
24 communication. This is Mr. Correll.  
25 A. I don't know the answer to that.

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1 Q. (BY MR. SHEEHAN) Do the outside counsel get  
2 to make decisions about who to select for review on  
3 behalf of the NRA?  
4 MR. GARMAN: Objection to the form of the  
5 question.  
6 A. I don't -- I don't know that outside counsel  
7 is making that selection. I mean, it could very well be  
8 the treasurer's office making that selection.  
9 Q. (BY MR. SHEEHAN) So you have no idea who made  
10 the selection. Is that correct?  
11 A. That's correct.  
12 Q. All right.  
13 MR. GARMAN: Counsel, it's 1 o'clock. Do  
14 we want to take a lunch break at some point?  
15 MR. SHEEHAN: That sounds like a sensible  
16 idea. Any objections to stopping now, because we would  
17 be going to schedule O next?  
18 MR. GARMAN: I have none. If you want to  
19 conclude a portion of your questioning before we break,  
20 though, that's fine with us.  
21 MR. SHEEHAN: No. We're going to go to  
22 schedule O, so why don't we stop here.  
23 And how much time do you need?  
24 THE VIDEOGRAPHER: We are now off the  
25 record. The time on the video is 1 o'clock p.m.

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1 (Break from 1:00 p m. to 1:49 p m.)  
2 THE VIDEOGRAPHER: We're back on the  
3 record. The time on the video is 1:49 p m.  
4 Q. (BY MR. SHEEHAN) Mr. LaPierre, did you during  
5 the time that you were at the NRA as the chief executive  
6 officer and executive VP ever travel to the Super Bowl  
7 on the NRA's dime?  
8 A. Yes. The NRA used to host shoots, sporting  
9 clay shoots for the NFL Alumni. And we were a partner  
10 in the NFL Alumni on running their weekend and their  
11 sporting clay shoots and all of that as outreach in  
12 bringing NFL athletes to support the NRA, as part of the  
13 effort to make sure all of those cultural influences on  
14 American society, that NRA has inroads into them and  
15 supporters. So the NRA partners with the NFL Alumni,  
16 and, yeah, we were a participant.  
17 Q. So did you yourself with your wife attend the  
18 Super Bowl itself?  
19 A. Yes, we did.  
20 Q. How often?  
21 A. As part of -- as part of the NFL Alumni  
22 Weekend that the NRA partnered --  
23 Q. But you had tickets to the game yourself with  
24 your wife?  
25 A. We did, from the NFL Alumni.

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1 Q. They gave you the tickets?  
2 A. I believe so.  
3 Q. How did you get to the Super Bowl --  
4 A. I'm not sure.  
5 Q. I'm sorry?  
6 A. I'm not sure. I just know that we were -- NRA  
7 partnered with NFL Alumni. We ran sporting -- the  
8 sporting clay shoots. We went to the big dinner that  
9 they had. They would even have us up on -- the one that  
10 is now NFL Honors, they would have us up on stage. They  
11 would say it's great to have the NRA people here. I  
12 mean, all that is great for the NRA, in terms of keeping  
13 this organization in the mainstream of American society,  
14 while the people that want to defeat us, that say  
15 horrible things about the NRA, like General James did,  
16 it's a criminal terrorist organization or, you know --  
17 Q. That's okay. Now you're filibustering.  
18 Tell me, did you go to the All-Star Game as  
19 well on the NRA's dime?  
20 MR. GARMAN: Objection to form.  
21 A. I think I -- I once was at the NBA All-Star  
22 Game.  
23 Q. (BY MR. SHEEHAN) Paid for by the NRA?  
24 A. I can't remember where -- I guess somebody  
25 gave us a ticket. I can't remember where. I don't --

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1 Q. How about -- how about the Pro Bowl? Did you  
2 ever attend the Pro Bowl in Hawaii?  
3 A. Yes, as part of the NFL Alumni joint  
4 experience we did, yeah.  
5 Q. When you say the NFL joint experience, what is  
6 that? Let me go back --  
7 A. Part of it --  
8 Q. Did you get tickets to the Pro Bowl from the  
9 NFL?  
10 A. I don't think I went to the Pro Bowl. I think  
11 I went to the -- I think I went to the -- I went to the  
12 NFL Alumni events and participated in all of those NFL  
13 Alumni events they did at the Pro Bowl one year I was  
14 there for the NRA.  
15 Q. Did you --  
16 A. It's part of my job. I mean, it's part of my  
17 job, is to -- is to do outreach. I mean, you do that in  
18 a lot of ways. I mean, we talked about it. Grassroots  
19 speeches, TV appearances, representing the members.  
20 It's also to make contact, with whether it's country  
21 music, whether it's the NFL Alumni, whether it's  
22 celebrities, whether it's NASCAR, whether it's -- I  
23 mean, all of it benefits the NRA by keeping NRA in the  
24 mainstream of American society, as opposed to letting  
25 them push us to the fringe, which is how NRA loses. So

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1 all the outreach we did with that was beneficial to the  
2 NRA in terms of contact, creating spokespersons,  
3 creating goodwill toward the organization and the cause.  
4 It was all -- all benefits the NRA.  
5 Q. With respect to the Super Bowl clay shoot, was  
6 there some video that I can find on the internet or  
7 elsewhere showing what you did there?  
8 MR. GARMAN: Objection to form.  
9 Go ahead.  
10 A. There may be. There may be. I know there  
11 were programs. There were, you know, printed programs  
12 and all of that about the shoot. The NFL Alumni  
13 publicized it. It was part of the whole Super Bowl  
14 weekend. It was well documented. I mean, the NFL  
15 Alumni will tell you everything that happened.  
16 Q. (BY MR. SHEEHAN) Let's go to schedule O,  
17 which in Exhibit 1 is pages 91 through, I think, 94.  
18 MR. GARMAN: All right. We're there.  
19 Q. (BY MR. SHEEHAN) Take a look at page 92 of  
20 the IRS 990, and you'll see on the review of Form 990 by  
21 the governing body, which is the second box -- and  
22 you'll see there it says drafts of Form 990 are reviewed  
23 by the external accounting firm. Was that correct at  
24 the time this was submitted to the IRS?  
25 MR. GARMAN: Objection to form.

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1 Go ahead.  
2 A. Are drafts of the form reviewed by the  
3 external accounting firm? I'm sure that's -- I'm sure  
4 that's true.  
5 Q. Why do you believe it's true?  
6 A. I'm not -- I mean, I don't know -- I was not  
7 there when it was shown to the external auditing firm,  
8 but -- I mean, whoever prepared this -- I'm sure it's  
9 the truth in terms of the preparers preparing it that  
10 way.  
11 Q. And it says next, It was presented at the NRA  
12 board of directors audit committee and made available to  
13 the board members attending the board of directors  
14 meeting.  
15 Do you know when that occurred, that is, these  
16 events that are described in that part of the sentence?  
17 MR. GARMAN: Objection to the form of the  
18 question.  
19 A. Yeah, we talked about that earlier. I'm sure  
20 that the dates -- I mean, they're always -- I remember  
21 announcements at the board meeting. They're available  
22 in the back of the room. I -- I didn't prepare this. I  
23 don't know specifically when it occurred. It probably  
24 occurred -- I don't know specifically.  
25 Q. (BY MR. SHEEHAN) Okay.

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1 A. I rely on the people that prepared it.  
2 Q. It then says, The NRA's elected officials and  
3 audit committee leadership reviewed a final draft before  
4 filing.  
5 Is it true that the draft which was seen by  
6 the audit committee and the board membership did not  
7 include the specific items on schedule L and did not  
8 include the answer to the diversion in part VI, question  
9 5, and did not include the excess benefits to  
10 disqualified individuals on part IV's questions 25a and  
11 b?  
12 MR. GARMAN: Objection to form.  
13 Go ahead.  
14 A. I just don't know the answer to that.  
15 Q. (BY MR. SHEEHAN) Okay. At the end, you'll  
16 see the exempt organization declaration and signature  
17 for electronic filing, which is page -- I guess it  
18 follows page 98. Do you see that?  
19 MR. GARMAN: Our page 98 is part III of  
20 schedule R.  
21 MR. SHEEHAN: It should be page 99, but I  
22 don't see a marking on that page as 99, or it might be  
23 100.  
24 MR. GARMAN: I'm sorry, Counsel. Are we  
25 looking for the exempt organization declaration and

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1 signature with electronic filing?  
2 MR. SHEEHAN: Yes, exactly.  
3 MR. GARMAN: That's our page 102.  
4 MR. SHEEHAN: That's weird. Okay.  
5 Q. (BY MR. SHEEHAN) Okay. But that's your page  
6 102. In any event, it's the 2019 exempt organization  
7 declaration and signature for electronic filing, and  
8 you'll see a signature on there dated 11/17/20, and it  
9 looks like your signature. Is that your signature,  
10 Mr. LaPierre?  
11 A. Yes, sir, it is.  
12 Q. All right. And is that -- did you actually  
13 sign it, or is this a stamp?  
14 A. No, I signed it.  
15 Q. Okay. Very good.  
16 With that, we are done with Exhibit 1.  
17 Could we go at this point to Exhibits 2 and 3,  
18 which will be the 4720s?  
19 MR. SHEEHAN: Do I have here -- let me  
20 see my schedule.  
21 MR. GARMAN: This is Greg Garman. We  
22 only show an Exhibit 1, and then it identifies there's  
23 there's "loaded in error" in an exhibit on the Egnyte  
24 system.  
25 MR. DRAKE: Yeah, the one that says

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1 "loaded in error," that's me, Scott. I apologize. I  
2 was trying to put something in my folder. So I pulled  
3 it -- I tried to pull it back. But I don't see any  
4 other exhibits from the AG either, Greg.  
5 Q. (BY MR. SHEEHAN) While you're doing that,  
6 Mr. LaPierre, do you know what a Form 4720 is with  
7 respect to the IRS?  
8 A. I do. I submitted a -- several of those in  
9 terms of the -- the excess benefit on the compensation  
10 that should have been charged and was repaid. It was a  
11 penalty for the -- it was the IRS penalty form.  
12 Q. All right. And that -- that -- the 4720 that  
13 you signed was an individual form. Correct?  
14 A. Correct.  
15 Q. And when did you make that payment to the IRS?  
16 A. Almost immediately, within like a week or two  
17 after the filing of the 990.  
18 Q. And who calculated the tax due for you that  
19 you should repay?  
20 A. The tax -- a tax attorney firm. I believe it  
21 was Cheney -- the Cheney firm, working with -- I think  
22 it was the Cheney firm primarily.  
23 Q. And are they your personal tax counsel?  
24 A. Yeah. I wrote them a personal check for doing  
25 that.

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1 Q. Okay. How long have they been your tax  
2 counsel?  
3 A. They were referred -- they were found by my  
4 lawyer to work on it. My -- my tax preparer does not  
5 have any experience doing 990, 4720, that type stuff.  
6 So that tax preparer declined to do them and we had to  
7 find someone else, and my attorney found this other  
8 firm.  
9 Q. Who is your ordinary tax preparer?  
10 A. Karen Thomas --  
11 Q. Karen Thomas.  
12 A. -- who works at Gilbert & Wolfand.  
13 Q. Where are they located?  
14 (Reporter clarification.)  
15 A. Gilbert & Wolfand in Washington, D.C.  
16 Q. (BY MR. SHEEHAN) Do you know with respect to  
17 4720s, was there any discussion that you had with anyone  
18 concerning whether there should be a management excise  
19 tax in addition to the -- in addition to the  
20 disqualified person excise tax?  
21 MR. GARMAN: Objection to form.  
22 Don't invade --  
23 Q. (BY MR. SHEEHAN) Do you understand my  
24 question?  
25 A. I don't understand your question.

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1 Q. The -- the 4720 imposes a tax of 10 percent,  
2 not more than \$25,000, for managers who oversaw the  
3 transaction which resulted in the liability of the  
4 individual. Have you had a discussion with anybody  
5 before today about that 10 percent excise tax?  
6 MR. CORRELL: This is Mr. Correll. I  
7 object to the question to the extent that it seeks  
8 communications between Mr. LaPierre and his personal  
9 counsel or any other counsel.  
10 Q. (BY MR. SHEEHAN) Mr. LaPierre?  
11 A. I will turn to my --  
12 MR. CORRELL: Do you need to consult --  
13 if Mr. LaPierre would like to consult with me before he  
14 answers the question, I'm happy to do that if you have  
15 no objection.  
16 MR. SHEEHAN: That's fine. Let's go off  
17 the record.  
18 THE VIDEOGRAPHER: We're going off the  
19 record. The time on the video is 2:06 p m.  
20 (Break from 2:06 p m. to 2:07 p.m.)  
21 THE VIDEOGRAPHER: We're back on the  
22 record. The time on the video is 2:07 p m.  
23 A. Yeah, Mr. Sheehan, the answer to your question  
24 is I didn't have any conversations with anyone about  
25 this.

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1 Q. (BY MR. SHEEHAN) Okay. Thank you.  
2 Now we're going to use Exhibit 2, which is the  
3 collection of the three 4720s filed by the NRA. The  
4 first one is the 2018, the second one is the original  
5 2019, and the final one is the amended 4720.  
6 (Exhibit 2 marked.)  
7 Q. (BY MR. SHEEHAN) So let me ask you first,  
8 Mr. LaPierre, with respect to the 2018 4720, which is  
9 the initial page 1 to 10 of the exhibit, did Mr. Spray  
10 consult with you before he signed and filed the 2018  
11 4720?  
12 A. No, he did not.  
13 Q. Okay. With respect to the original 2019 4720,  
14 which is page 11 to 20 of this exhibit, did Mr. Spray  
15 consult with you before he filed the -- the original  
16 2019 4720?  
17 A. No, he did not.  
18 Q. Okay. With respect to the amended 4720, did  
19 Mr. Spray consult with you before he filed the amended  
20 4720, which is page 21 to the end of the -- of  
21 Exhibit 2?  
22 A. No, he did not.  
23 Q. Apart from Mr. Spray, did you review the 2019  
24 4720 before it was filed?  
25 A. I did not.

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1 Q. Do you know who prepared the amended 4720,  
2 which is pages 21 to the end of Exhibit 2?  
3 A. I don't. I just know I was -- I was told  
4 by -- by NRA that in terms of my 4720s, I need to go  
5 find an independent tax preparer and NRA couldn't do it.  
6 Q. When we look at these transactions under  
7 schedule L, were you confident that the transactions for  
8 you recorded on schedule L were true, correct and  
9 complete?  
10 MR. GARMAN: Counsel, could you point us  
11 to schedule L?  
12 MR. SHEEHAN: Sure. Schedule L, the  
13 schedule L on 2019 990, and it is at -- it is at page 81  
14 through 86. The critical stuff for you is on page 86  
15 and 87.  
16 MR. GARMAN: What exhibit are we looking  
17 at?  
18 MR. SHEEHAN: We're looking at Exhibit 1.  
19 MR. GARMAN: You have to reopen it.  
20 MR. SHEEHAN: And it's page 87.  
21 MR. GARMAN: Okay. So just to be clear,  
22 our page 87 is schedule M, but there is a schedule L  
23 that begins on page -- oh, I'm sorry. It's 86 and 87.  
24 It's slow pagination. I apologize.  
25 Q. (BY MR. SHEEHAN) Take a look at page 87,

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1 schedule L, Part I, line 1 to 4 reference, excess  
2 benefit transaction Wayne LaPierre.  
3 Mr. LaPierre, I'm asking you are you confident  
4 that the amount of money set forth on that page is the  
5 true, correct and complete amount of money for travel  
6 that is excess benefits?  
7 A. Yes.  
8 MR. GARMAN: Objection to the form.  
9 Go ahead.  
10 A. Yes, I am.  
11 Q. (BY MR. SHEEHAN) Okay. And you'll see when  
12 you go to the 4720 form that much of the same language  
13 is contained in the 4720, but that was not a document  
14 you ever reviewed, is my understanding. Correct?  
15 MR. GARMAN: Sorry. I have to object,  
16 Counsel. Every time we flip back and forth in the  
17 Egnyte system between the exhibits, we actually have to  
18 close this document and reopen the other document.  
19 MR. SHEEHAN: Sorry.  
20 MR. GARMAN: That's the way it works, so  
21 it doesn't let you have two tabs open. So do you want  
22 us to open Exhibit 2?  
23 MR. SHEEHAN: Yes, please, and go to page  
24 3 -- page 3 at the end, which is the explanation section  
25 on the amended return.

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1 MR. GARMAN: Okay. I think -- I think we  
2 are at the same place. We are looking at page 30 of 34.  
3 I think this is the page that you wanted us to look at.  
4 Q. (BY MR. SHEEHAN) Do you see the heading that  
5 says Wayne LaPierre?  
6 A. Yes, I do.  
7 Q. Okay. And the next paragraph says, From 2015  
8 through 2019, the NRA estimates that it paid on behalf  
9 of Mr. LaPierre, directly or indirectly, travel expenses  
10 for Mr. LaPierre in the aggregate amount of 299,778.78.  
11 Do you see that?  
12 A. Yes, I do.  
13 Q. And you believe that amount is accurate and  
14 complete. Is that correct?  
15 A. I do.  
16 Q. Do you know why the NRA uses the term  
17 "estimates" to talk about the payments?  
18 MR. GARMAN: Objection to form.  
19 A. I don't. I don't.  
20 Q. (BY MR. SHEEHAN) Okay. And do you know  
21 why -- are there payments that were made indirectly for  
22 your travel?  
23 MR. GARMAN: Objection to form.  
24 Go ahead.  
25 A. No. No.

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1 Q. (BY MR. SHEEHAN) So how were the payments  
2 made for your travel that ended up being in that sum of  
3 299,778.78?  
4 A. I'm sorry, I --  
5 Q. Okay.  
6 A. How were these -- how did they get to 299,778?  
7 Q. What I am looking for is you said all the  
8 travel -- my understanding of the last statement was all  
9 the travel expenses were billed directly to the NRA.  
10 Correct?  
11 MR. GARMAN: Objection to form.  
12 Go ahead.  
13 A. Correct.  
14 Q. (BY MR. SHEEHAN) And there were no indirect  
15 payments for those travel expenses?  
16 A. Not that -- not that I know of.  
17 Q. Okay. You will also see at the bottom of page  
18 3 there's discussion of Oliver North.  
19 A. I see it.  
20 Q. All right. During the same period AM,  
21 Ackerman McQueen, invoiced the NRA for a whole variety  
22 of expenses which are now the subject of litigation but  
23 are believed to include salary, benefits and related  
24 perks furnished by AM to North in connection with  
25 North's employment by AM.

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1 Did you approve those expenses?  
2 MR. GARMAN: Objection to form.  
3 Go ahead.  
4 A. I -- I have not seen the Ollie North expenses  
5 that were covered by Ackerman -- that were paid for by  
6 Ackerman McQueen. I knew that -- when I had discussions  
7 with Colonel North in terms of him coming with the NRA  
8 or being president of the NRA and maybe doing a show on  
9 the NRATV network, he talked in -- in general about what  
10 his compensation would have to be. He said something  
11 like he made 2 million with Fox and it would have to be  
12 somewhere in that range. I think he said something  
13 about security or health benefits or something. But I  
14 -- I wasn't there when they worked out the final  
15 contract with Mr. North.  
16 Q. (BY MR. SHEEHAN) You weren't where?  
17 A. I wasn't in the room. I wasn't present. I  
18 wasn't involved.  
19 Q. Who was? Was anybody from the NRA in the  
20 room?  
21 A. I don't know the answer to that. I just know  
22 I wasn't.  
23 Q. Did you sign off --  
24 A. I --  
25 Q. I'm sorry. Go ahead, I'm sorry.

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1 A. No, I'm sorry.  
2 Q. Who at the NRA approved the North/Ackerman  
3 contract?  
4 MR. GARMAN: Objection as to form.  
5 A. I -- I -- well, the NRA board elected Ollie  
6 North president. It was clear at that time that he  
7 would be doing a TV show, I believe, for NRATV. And in  
8 terms of who approved the contract, I -- that was a  
9 discussion ongoing for probably over a year, because I  
10 think the audit committee had discussions about it but I  
11 don't think they've seen it. I think there was a  
12 discussion where -- this is all to the best of my  
13 recollection. Ackerman was saying that they couldn't --  
14 he couldn't show the contract or something. I know the  
15 audit committee was trying to get the contract to look  
16 at -- I think there was -- it was up in the air as to  
17 whether he was a contract employee or whether he was  
18 actually an employee of Ack-Mac and -- anyway, but  
19 clearly we at the NRA, I mean, including me, agreed that  
20 he would be doing a TV show for Ack-Mac and that they  
21 would be reimbursed for that TV show by the NRA, by the  
22 NRATV network.  
23 Q. (BY MR. SHEEHAN) And in fact, when you say  
24 you agree with Ackerman, you the NRA agree with Ackerman  
25 that there be payments for Mr. -- for Colonel North's TV

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1 show, was there a document confirming that  
2 understanding?  
3 MR. GARMAN: Objection to form.  
4 A. I don't know. I'd have to -- you'd have to  
5 check with the fiscal officer that worked out -- the  
6 treasurer that worked out all the financial documents  
7 like that.  
8 Q. (BY MR. SHEEHAN) Was there a business case  
9 document prepared with respect to Colonel North's  
10 contract?  
11 MR. GARMAN: Objection to form.  
12 A. I don't know that there was a business case.  
13 I know that -- I mean, I personally thought that  
14 bringing Ollie in as president with -- I thought that  
15 that would benefit the NRA. I thought that he would --  
16 you know, direct mail signatures are important. I  
17 thought if we could get him to sign some direct mail, we  
18 could -- you know, and monetize -- and help monetize  
19 NRATV, that there was going to be more than what he was  
20 being paid in return to the NRA. I --  
21 Q. (BY MR. SHEEHAN) I'm with you on that, but  
22 here is what I'm looking for. It's a very specific  
23 question.  
24 The NRA, according to the 990, paid Oliver  
25 North \$986,000 -- \$986,015 in 2019. So I'm trying to  
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1 find out who at the NRA authorized that expenditure and  
2 the payment to Ackerman McQueen for Colonel North's  
3 services?  
4 MR. GARMAN: Objection to form.  
5 Q. (BY MR. SHEEHAN) Did you authorize the  
6 expenditure?  
7 A. I -- I think that it was -- I think the  
8 treasurer's office ultimately --  
9 MR. GARMAN: This is not the document  
10 he's referring to.  
11 A. -- ultimately negotiated the payment, but  
12 I -- I mean, I -- I clearly knew that he was doing the  
13 TV show and that NRA was going to reimburse Ackerman for  
14 doing the TV show. So yeah, I mean, I authorized it,  
15 too, I guess.  
16 Q. (BY MR. SHEEHAN) You guess? You don't know  
17 whether you authorized \$986,000, payment of money to  
18 Colonel North?  
19 MR. GARMAN: Objection, form.  
20 A. Well, yes, it was to pay -- NRA was paying  
21 Ollie North to do the NRATV show on the NRATV network,  
22 to host that show, and that's what we authorized it for.  
23 That's what I authorized it for.  
24 Q. (BY MR. SHEEHAN) Okay. So we're clear, you  
25 authorized the payment to Ackerman McQueen of \$986,000  
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1 for Oliver North. That's correct?  
2 MR. CORRELL: This is Mr. Correll.  
3 Objection to form.  
4 A. I didn't -- I don't know how they got exactly  
5 the 986,000. I authorized that we were going to  
6 reimburse Ackerman for the cost of Ollie North doing the  
7 NRA network -- NRATV show for the NRATV network. I  
8 don't know how they got -- the specifics from a fiscal  
9 standpoint in terms of how they got the 986,000 or  
10 whatever was done by the treasurer's office. I wasn't  
11 involved in that. I don't know.  
12 Q. (BY MR. SHEEHAN) Okay.  
13 A. I don't see those invoices. I didn't see that  
14 billing. I didn't get involved in that.  
15 Q. Thank you. That covers Exhibit 2.  
16 I would like to go now to Exhibit 3, which is  
17 the travel reimbursement spreadsheet.  
18 (Exhibit 3 marked.)  
19 MR. GARMAN: We haven't seen it show up  
20 yet.  
21 MR. SHEEHAN: Is it coming up for you  
22 all?  
23 MR. GARMAN: We have a document that's  
24 called Exhibit 2-3. Is that it?  
25 MR. SHEEHAN: That's it.  
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1 MR. GARMAN: Counsel, can you represent  
2 to me what this is? I have a concern this a -- I have a  
3 concern this is our work product.  
4 MR. SHEEHAN: This is a document produced  
5 by the -- this organization, the NRA. Let me just  
6 confirm with my colleagues.  
7 MR. CONLEY: Okay. The Bates number is  
8 NRA-BK-00039547.  
9 THE REPORTER: Excuse me. Who was that?  
10 Who was speaking just then?  
11 MR. CONLEY: Jonathan Conley with the New  
12 York Attorney General's Office.  
13 MR. GARMAN: Thank you.  
14 Counsel, I do have a concern this might be a  
15 privileged document. Once again, we produced it. I  
16 just want to make clear that by allowing you to ask  
17 questions, this questioning doesn't constitute some form  
18 of additional waiver.  
19 MR. SHEEHAN: I like the term  
20 "additional" in that sentence, yeah.  
21 MR. GARMAN: Well, I'm certainly not  
22 conceding it was a waiver, but I want to make sure  
23 whatever happens doesn't -- doesn't change by this  
24 questioning. Are we in agreement?  
25 MR. SHEEHAN: That's fair.  
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1 Q. (BY MR. SHEEHAN) Mr. LaPierre, in front of  
2 you is a 12-page document which has been marked  
3 Exhibit 3 in this deposition. Can you identify this  
4 document?  
5 A. Yes, I do. It's the -- it's a document that  
6 was involved in the -- in calculating the excess benefit  
7 that I owed the NRA.  
8 Q. And what was your role in preparing this  
9 document?  
10 A. All I did was -- was talk about what the  
11 purposes of the trips were.  
12 Q. Did you make any effort to determine -- if you  
13 look across, we have the dates -- let me start the  
14 question again.  
15 Did you make any effort to determine whether  
16 the dates were correct, the bill to was correct, the  
17 trip dates were correct, the trip start date was  
18 correct, the itinerary was correct, the passengers were  
19 correct, the invoice amount was correct, the purpose was  
20 correct, the -- the reimbursement amount was correct and  
21 the -- I guess that's it. We'll skip the rest.  
22 MR. CORRELL: Objection to form.  
23 MR. GARMAN: This is Greg Garman.  
24 Objection to form. Objection to foundation.  
25 Go ahead.

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1 A. I had no role at all in terms of the  
2 reimbursement part. As we talked about earlier, I had  
3 no role in that at all. I did, to the best of my  
4 ability, recollect the purposes of the trips and why --  
5 and what was the purposes of the trips.  
6 Q. (BY MR. SHEEHAN) So let's start with number  
7 1, okay. The trip from Washington to Van Nuys,  
8 California and return to Washington. It says Wayne  
9 LaPierre and guests. Do you know who the guests were?  
10 MR. GARMAN: Objection to form.  
11 Don't speculate.  
12 A. I -- I don't know who the guests were.  
13 Q. (BY MR. SHEEHAN) Okay. You'll see the  
14 invoice amount is 65,468. Do you believe that amount is  
15 correct?  
16 A. I -- I do.  
17 Q. And what's that based upon?  
18 A. I assume it's based upon the billing, the NRA  
19 records.  
20 Q. Okay. So you assume, so you don't know?  
21 A. Yeah, that would have been provided by the  
22 NRA, by the -- not me, by the treasurer's office.  
23 Q. How do you know that? How do you know it was  
24 provided by the treasurer's office?  
25 A. Well, I -- I assume that's where the bills

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1 came in to.  
2 Q. So you don't know for sure where the invoice  
3 amount came from. Is that correct?  
4 A. Correct.  
5 Q. Okay. The next thing has now as to the  
6 passengers. Did you have contemporaneous documentation  
7 of who the passengers were on this trip number 1 on  
8 Exhibit 3?  
9 MR. GARMAN: Objection to the form.  
10 A. I don't know who they were. It's somebody --  
11 I don't know. It's just --  
12 Q. (BY MR. SHEEHAN) I'm sorry.  
13 A. My wife didn't go, so I assume they were other  
14 NRA people that went.  
15 Q. But you had no contemporaneous record of who  
16 was on that trip. Correct?  
17 A. Correct.  
18 Q. If we look at the one --  
19 A. Although, I mean, unless -- unless it was on  
20 one of the itineraries the NRA had from -- from -- you  
21 know, that came in or something.  
22 Q. But as far as you reviewing -- as far as you  
23 reviewing this bill and then saying whether it was for  
24 you or it was for the NRA in terms of what's the  
25 appropriate charge, you did not have any records showing

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1 who was on the trip. Is that correct?  
2 MR. GARMAN: Objection to form and  
3 objection to the foundation. I don't think we've  
4 identified he had anything to do with this.  
5 MR. SHEEHAN: Let's keep asking him.  
6 Q. (BY MR. SHEEHAN) Mr. LaPierre, what records  
7 did you have to show who were the passengers on this  
8 flight on 5/26 to 5/30/2015?  
9 A. Well, that's what I'm saying is I didn't have  
10 a record of who the other people were. It could have  
11 been Tyler Schropp. It could have been -- it could have  
12 been some other NRA person that was going out there.  
13 Q. And there was no record --  
14 A. It could have been -- it could have been an  
15 Ackerman person or -- I just don't know.  
16 Q. Okay.  
17 A. I know why I was there.  
18 Q. And was that Memorial Day Weekend that you  
19 were there?  
20 A. I'm not -- it's 6/1. May -- yeah, yes, it  
21 looks like it was.  
22 Q. So you're out in LA for four days around  
23 Memorial Day Weekend?  
24 A. Yeah, working.  
25 Q. Okay. And then it says WLP only business

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1 flight. SLP did not go.  
2 Do you know where this text in this  
3 spreadsheet comes from? Did it come from you?  
4 MR. CORRELL: Objection. This is  
5 Mr. Correll. Objection to the form.  
6 And also to the extent that this would require  
7 you to divulge any attorney/client communications, I  
8 instruct you not to answer.  
9 Q. (BY MR. SHEEHAN) Mr. LaPierre?  
10 A. I will listen to my attorney.  
11 Q. Meaning what? You're not going to answer the  
12 question?  
13 A. Well, he's instructed me not to answer.  
14 MR. SHEEHAN: I didn't hear that.  
15 MR. CORRELL: This is Mr. Correll. That  
16 is the instruction if, in fact, Mr. LaPierre has  
17 concluded that answering your question would require him  
18 to disclose a communication with an attorney, and he  
19 will follow that instruction.  
20 MR. SHEEHAN: This is going to be a very  
21 difficult set of questions because everything on this  
22 sheet looks like Mr. LaPierre believes, Mr. LaPierre  
23 says. And I see no other facts from this spreadsheet,  
24 but let's see what we can do.  
25 MR. GARMAN: Hold on. Hold on. I have  
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1 still yet to hear foundation that he's -- that he knows  
2 anything about this spreadsheet or prepared it.  
3 MR. SHEEHAN: I don't think he needs to  
4 know it. Well, let's go off the record for a second.  
5 THE VIDEOGRAPHER: We're going off the  
6 record. The time on the video is 2:34 p m.  
7 (Break from 2:34 p m. to 2:42 p m.)  
8 THE VIDEOGRAPHER: We are back on the  
9 record. The time on the video is 2:42 p m.  
10 MR. GARMAN: Counsel?  
11 MR. SHEEHAN: Yes, sir.  
12 MR. GARMAN: Let's see if we can figure  
13 this out.  
14 So I currently believe this was an inadvertent  
15 production, the consequences of which we can fight about  
16 another day. Having said that, sitting here right now,  
17 I believe this document was created by or at the  
18 direction of a lawyer, and the only input that  
19 Mr. LaPierre had was in a phone call with a lawyer. I  
20 would propose we put a pin in it until tomorrow, and I  
21 can go look into it tonight to see if that's the case.  
22 If that's not the case, I'm going to instruct him to --  
23 to not answer questions because I do believe the  
24 totality of his input was -- was at the direction of  
25 counsel or with counsel.  
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1 MR. SHEEHAN: I am uncomfortable doing  
2 that, given the fact that we have a trial in seven days.  
3 This was a produced document, and I do not see what  
4 benefit collectively we get from sticking a pin in it  
5 and waiting another day to have the same fight.  
6 MR. GARMAN: Well --  
7 MR. SHEEHAN: If you're going to instruct  
8 him not to answer, that's great; but, you know, why  
9 don't you do it.  
10 MR. GARMAN: Okay. That's fine. I was  
11 attempting to say if -- I was attempting to say I will  
12 go look to see if there's a nonprivileged component to  
13 this to see if you want to ask the question later; but  
14 that is the instruction I will give today, and if you  
15 want to move forward, that's your prerogative.  
16 Q. (BY MR. SHEEHAN) Mr. LaPierre, looking at  
17 series number 2, you will see in the trip purpose it  
18 says, WLP and SLP believe this invoice is likely for the  
19 roundtrip.  
20 Do you believe that that invoice on -- for the  
21 6/11/2015 is for the roundtrip?  
22 MR. GARMAN: So I instruct you not to  
23 answer if the only basis for your answer would invade  
24 the attorney/client privilege.  
25 THE WITNESS: And what?  
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1 MR. GARMAN: I am instructing you not to  
2 answer the question.  
3 Q. (BY MR. SHEEHAN) Let me see if I'm clear.  
4 Apart -- well, do you recognize -- let me go back.  
5 Is it your belief that you attended the Shikar  
6 Safari Club annual convention on June 2, 2015 and the  
7 following days?  
8 MR. GARMAN: You can answer that.  
9 A. Yes, I did.  
10 Q. (BY MR. SHEEHAN) All right. Do you recall  
11 significant contributions including at least one  
12 significant contribution for 4 million?  
13 MR. CORRELL: Excuse me. This is Kent  
14 Correll. I'm not comfortable with the questioning  
15 continuing about a document that may have been  
16 inadvertently produced. I know that, at least to our  
17 practice primarily, if a document is inadvertently  
18 produced, that counsel would work out some sort of a  
19 return. I would love to accommodate you if we could,  
20 but if, in fact -- and I don't know that it was, but if,  
21 in fact, this document was inadvertently produced, then  
22 I don't think it's appropriate for you to be going  
23 through an examination on the basis -- (audio unclear.)  
24 Again, I would like -- I think we can skin  
25 this cat another way, which is if -- we're going to be  
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1 together again tomorrow and if we can get more facts as  
2 to how this was produced, we might be able to work out a  
3 situation that would allow you to continue the  
4 examination, but we just don't have all the facts we  
5 have as we sit here right now to make that decision.  
6 MR. SHEEHAN: Let's go off the record  
7 collectively and have a conversation.  
8 MR. GARMAN: Sure.  
9 MR. CORRELL: Sure.  
10 THE VIDEOGRAPHER: We are going off the  
11 record. The time on the video is 2:46 p m.  
12 (Break from 2:46 p m. to 3:27 p m.)  
13 THE VIDEOGRAPHER: We are back on the  
14 record. The time on the video is 3:27 p m.  
15 BY MR. SHEEHAN: All right. I believe I  
16 can represent on the basis of the off-the-record  
17 conversation that we will proceed with the examination  
18 of Exhibit 3 -- is it 3 -- and that counsel for the  
19 debtor are not waiving their -- are not engaging in any  
20 further waiver of attorney/client or work product  
21 privileges by permitting the witness to answer the  
22 questions here.  
23 And the second issue has to do with the  
24 30(b)(6) and the failure of the designated witness,  
25 Ms. Rowling to address the dollar amounts set forth in  
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1 the 900 and the 4720, and I think the parties do agree  
2 to disagree on that issue, but we will follow up.  
3 MR. CORRELL: Yes. And if I may  
4 interject -- this is Mr. Correll. (Audio unclear.)  
5 (Reporter clarification.)  
6 MR. CORRELL: I just want to propose that  
7 the same deal be extended to Mr. LaPierre personally so  
8 that there is no question of personal labor that were  
9 the subject -- we're making the same deal the NRA is  
10 making. Is that all right?  
11 MR. SHEEHAN: Yes.  
12 MR. CORRELL: Okay.  
13 Q. (BY MR. SHEEHAN) So Mr. LaPierre, in -- in  
14 determining what charges to include in your repayment to  
15 the NRA and what charges for which you're subject to  
16 tax, did you consider any flights before June 1, 2015?  
17 A. No. These are the ones that -- that they  
18 started with.  
19 Q. And do you know why they started on June 1,  
20 2015?  
21 A. I don't.  
22 Q. Okay. If you look at the number 1, you'll see  
23 it says, WLP only business flight. SLP did not go. WLP  
24 met with Associated Television, the owner of MMP in  
25 connection with NRA business.  
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1 A. Right.  
2 Q. Is that true?  
3 A. Yes, it's true. I was always -- I always  
4 tried to meet with what I considered the engines that  
5 bring in money and bring in the atmosphere and the air  
6 in terms of the ability of the NRA to make money. So I  
7 constantly was --  
8 Q. Mr. LaPierre, I'm focused on this specific  
9 flight. Is it true --  
10 A. Yes, that's true.  
11 Q. -- that it was with Associated Television?  
12 A. True.  
13 Q. And how do you know that's true?  
14 MR. GARMAN: Object to form.  
15 Go ahead.  
16 A. Because that's what I went out there to do.  
17 Q. (BY MR. SHEEHAN) And you know that today,  
18 about 6/1/2015? I'm sorry, 5/26 to -- let me start  
19 again.  
20 You know today, sitting here from your memory,  
21 that on 5/26 to 5/30 you went out to Associated  
22 Television and met with them and that was the purpose of  
23 the flight?  
24 A. I do.  
25 Q. And the -- did you have any records to examine  
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1 in order to come to that conclusion?  
2 MR. GARMAN: Objection as to form.  
3 A. Well, yeah. I mean, it's -- it's backed up by  
4 my expense account too.  
5 Q. (BY MR. SHEEHAN) What expense account is  
6 that?  
7 A. With NRA.  
8 Q. Who did you submit that expense account to?  
9 A. To the NRA.  
10 Q. What part of the NRA?  
11 A. To the -- to the ILA fiscal office.  
12 Q. All right. So the -- in -- in coming to the  
13 conclusion that the full amount of 65,468 was proper,  
14 did you review the expense submission that you gave to  
15 the ILA?  
16 MR. GARMAN: Hold on. Hold on. Hold on.  
17 Objection. Counsel, Mr. LaPierre didn't create this  
18 document.  
19 MR. SHEEHAN: I know.  
20 MR. GARMAN: I don't think -- the invoice  
21 doesn't represent -- (audio unclear.)  
22 (Reporter clarification.)  
23 MR. GARMAN: -- his conclusions. The  
24 spreadsheet doesn't represent his conclusions.  
25 A. I don't know anything about how they got to  
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1 the 65,468. I had nothing to do with that at all. I  
2 just know why I was in California, which was to meet  
3 with MMP.  
4 Q. (BY MR. SHEEHAN) So in order to come to that  
5 conclusion, that is, that you flew out to California to  
6 meet with MMP, did you review any records?  
7 A. I did it from my -- from my memory as to what  
8 I was doing out there.  
9 Q. Okay. Did you review any submissions to ILA?  
10 MR. GARMAN: Objection to form.  
11 A. At the time I did it from my memory.  
12 Q. (BY MR. SHEEHAN) Okay. With respect to  
13 number 2, there's a recitation and trip purpose. Did  
14 you review any records before you gave -- let me  
15 rephrase that.  
16 Is the business purpose shown on this document  
17 accurate?  
18 A. It is.  
19 Q. How did you come to the conclusion that the  
20 trip purpose on this document is accurate?  
21 A. Because I went out to the Shikar Safari  
22 meeting, and I looked up the dates of when Shikar Safari  
23 met out there.  
24 Q. And in terms of the --  
25 Okay. Did you submit any bills to ILA, NRA

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1 ILA in addition to the airfare shown here?  
2 MR. GARMAN: Objection to form.  
3 A. Yes. I had some expenses when I was out  
4 there.  
5 Q. (BY MR. SHEEHAN) Did you examine -- did you  
6 examine those records to come to the conclusion that  
7 there was a business purpose for this flight?  
8 A. Well, yes, the business purpose of the flight  
9 was very clear. It was to represent NRA at the Shikar  
10 Safari meeting, make contact with -- and talk with all  
11 kinds of potential high donors. Ultimately, as a result  
12 of those relationships, Shikar Safari has given NRA  
13 Foundation over \$4 million. And -- and, you know,  
14 everybody gets up and gives a little speech at the  
15 Shikar meeting, too. So it's a great -- I mean, plus  
16 you want NRA right in the middle of the hunting  
17 community, and Shikar Safari is a part of the high donor  
18 hunting community.  
19 Q. Let's go back now to the NRA Country Music  
20 Week. What's that?  
21 A. There's a CMA Fest in Nashville, Tennessee  
22 that takes place every year. It's -- NRA was  
23 developing, promoting this big brand NRA Country. All  
24 this is part of mainstreaming the NRA with -- whether  
25 it's NASCAR, whether it's NFL Alumni, whether it's the

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1 country music artists, celebrities, you want to keep NRA  
2 in the mainstream. Plus, you wanted NRA to have access  
3 to all those cultural points in American society that  
4 influence American society. I mean, for example right  
5 now in country music, the Bloomberg people are doing  
6 everything they can working to cut us out of working  
7 with all these LA labels that are involved with country  
8 music. We're there to keep an NRA presence in the  
9 mainstream, work with these artists, get them to do  
10 things for NRA, get them to talk about NRA and also to  
11 meet people and donors in NRA.  
12 Q. Okay. Let's look at number 5, personal trip,  
13 but WLP flew charter per NRA security requirements. Is  
14 that accurate?  
15 A. Correct.  
16 Q. SLP/Sterners joined at no additional cost to  
17 NRA. Is that correct?  
18 A. Well, I think they added a reimbursement  
19 amount on that.  
20 Q. But no, it says the SLP/Sterners joined at no  
21 additional cost to the NRA. Is that -- is that your  
22 recollection of this particular flight?  
23 A. Well, yeah. I mean, the plane was going there  
24 anyway.  
25 Q. Is the recitation of the itinerary correct,

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1 that is, Washington to Nassau to Washington?  
2 A. Yes, it is.  
3 Q. No trips to Nebraska on this one?  
4 A. I do not -- no, I don't know. No.  
5 Q. I'm sorry, was that "I don't know" or "no"?  
6 A. That was no trips to Nebraska.  
7 Q. Okay. And do you know how the reimbursement  
8 amount was calculated?  
9 A. I don't.  
10 Q. Do you know what the SIFL calculation is?  
11 A. I don't.  
12 Q. All right. So it says five out, four back,  
13 Wayne LaPierre and guests. So who are the other four  
14 guests besides yourself?  
15 A. It would be myself. Susan flew down there.  
16 Colleen flew down there and Sienna. I don't -- and  
17 Terry Sterner, Colleen's husband, would have flown out.  
18 And only four would have flown back, which would be  
19 Terry -- Terry flew back commercially on his own.  
20 Q. Okay. So -- and in your view, this was a  
21 personal trip. Correct? That is, number 5?  
22 A. Yeah. I was down there as a security to get  
23 some safety for myself. My family, to get Susan and  
24 Colleen together to work on the Women's Leadership  
25 Forum. And yeah, as I said before, I did some stand-up

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1 on the website H2Ostream on boating and on guns --  
2 Q. You did a web stream on boating on H2O?  
3 A. Stand-ups, yeah. Some stand-ups.  
4 Q. What is -- what is H2O boating?  
5 A. We were creating a website involving gun laws  
6 and how that it was important for people involved in  
7 boating to understand the gun laws, because if you  
8 pulled into, for example, New York City or a harbor  
9 there, you could be in violation of the gun laws, so.  
10 Q. All right. Let's go on to number 6.  
11 LaPierre -- two LaPierre and guests, plural. All the  
12 facts that are set forth there, do you recall those --  
13 A. Yeah.  
14 Q. -- without looking at any documents?  
15 A. Yeah, I do. I know I went out and filmed  
16 Crime Strike. When I was in Santa Fe, I was a banquet  
17 speaker at the police championships. And I know that  
18 Bill Powers was with me and Nader. And then I went on  
19 to Maine to do the NASCAR weekend with donors. And  
20 yeah, that's -- that's correct.  
21 Q. Okay. Take a look at the second number 6,  
22 which is -- it says, This flight leg should be deleted.  
23 It did not occur.  
24 Is that your recollection sitting here today?  
25 A. I think so.

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1 Q. Did you look at any records to determine  
2 whether the flight occurred?  
3 A. I couldn't find any records that it occurred.  
4 Q. Do you know why the NRA paid \$18,835 for that  
5 flight?  
6 MR. GARMAN: Objection to the form of the  
7 question and foundation.  
8 Q. (BY MR. SHEEHAN) Do you know whether the NRA  
9 paid for this flight?  
10 A. I don't.  
11 Q. Do you know where the flight -- so it says  
12 Washington, D.C., Sanford, Albany, Washington on  
13 September 25th. Why do you believe this flight did not  
14 occur?  
15 MR. GARMAN: Objection to the form of the  
16 question.  
17 Go ahead.  
18 A. Flight leg should be deleted. It did not  
19 occur.  
20 Yeah, I tried to do this from --  
21 MR. GARMAN: Mr. LaPierre, don't  
22 speculate. If you know the facts, answer the facts.  
23 Q. (BY MR. SHEEHAN) Why do you believe --  
24 A. I think I --  
25 Q. Go ahead, I'm sorry.

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1 A. I think I -- I think what I did was I think I  
2 flew to Maine and I did a friends dinner up there. And  
3 then I think I drove to -- to Chester, Vermont and did  
4 a -- did a gun show that was in Chester, Vermont, and  
5 walked the gun show and did a meet and greet there. And  
6 then went to Albany and met with a bunch of people, NRA  
7 people, and then flew back to Washington.  
8 Q. So -- but the only flight I see from Albany to  
9 Washington is the one you say did not occur. Is that  
10 correct?  
11 MR. GARMAN: No, sir. No, sir. Look at  
12 the third number 6.  
13 Q. (BY MR. SHEEHAN) Okay. So let me go back,  
14 Mr. LaPierre. If you look at the second number 6 --  
15 A. Uh-huh.  
16 Q. -- do you know if the NRA was billed for that  
17 flight?  
18 A. I don't. I don't. I didn't see those.  
19 Q. Okay. Take a look at number 7. And this is  
20 four passengers. Business flight for Wayne, Susan,  
21 Tyler Schropp and Colleen Sterner. The trip to Kearny,  
22 Nebraska, there's no reimbursement for this one. What  
23 was the business purpose of the trip for the Sterners?  
24 A. This was the Women's Leadership Forum, the big  
25 summit that they did at The Broadmoor hotel in Colorado

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1 where they have, you know, a couple hundred women for a  
2 big summit and they raise a lot of money, and it was at  
3 The Broadmoor in Colorado Springs.  
4 Q. Okay.  
5 A. And --  
6 Q. So Sienna Sterner went on this trip. Correct?  
7 A. Correct.  
8 Q. But there's no amount allocated for her -- for  
9 her travel. Correct?  
10 A. That looks to be --  
11 MR. GARMAN: Objection to form.  
12 Go ahead.  
13 A. It looks to be correct.  
14 Q. (BY MR. SHEEHAN) Okay. Do you know why the  
15 travel for Sienna was not included as a reimbursement  
16 amount?  
17 A. I remember some mention -- and I don't --  
18 that something about if you're under two years old or  
19 something like that, you're not -- you're not -- they  
20 were not required, something like that.

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1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 Q. Okay. Let's take a look at number -- so for  
8 the flights that we've shown on 1 through 7, did you  
9 prepare contemporaneous records of the reason for these  
10 trips?  
11 A. I did them to the best recollection that I  
12 could recall as to -- as to what I was doing.  
13 Q. Right, but my question is a little bit  
14 different.  
15 At the time you were taking these trips, did  
16 you submit documentation to support the invoice, the  
17 payment of the invoice for the air travel?  
18 A. Well, I submitted documentation to support the  
19 purpose of -- unless it was a personal trip, to support  
20 the purpose of the trip.  
21 Q. Where would I find that?  
22 A. In ILA in the expense records.  
23 Q. So for each of these airplane trips, there  
24 would be invoices and a trip purpose that shows --  
25 A. Not for the airplane. The airplane invoices

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1 went separately to the treasurer's office. They -- they  
2 were not included in my -- any of my expenses.  
3 Q. Okay.  
4 A. I didn't even see them.  
5 Q. And the documentation showing the business  
6 relationship to the corporation of any persons  
7 entertained, where would I find those documents with  
8 respect to the trips?  
9 MR. GARMAN: Objection as to form.  
10 A. They would be in my expense reference that I  
11 submitted.  
12 Q. (BY MR. SHEEHAN) To the ILA?  
13 A. Correct.  
14 Q. Except for trips that are exclusively  
15 personal. Correct?  
16 A. Correct.  
17 Q. All right. Look at number 10, Associated  
18 Television has a large celebrity and media personality  
19 retreat. And when you were in Eleuthera, who paid for  
20 your lodging?  
21 A. It was part of the Associated Television  
22 retreat trip, so they -- they paid for it. It was with  
23 celebrities. It was -- it was me recruiting  
24 celebrities, meeting with donor prospects, and -- and it  
25 was part of their retreat that they do at that time of

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1 year they did every year with celebrities, and I was  
2 down there working the celebrity community, recruiting  
3 them, meeting donors, potential donors, and it was the  
4 NRA outreach into the celebrity community. I mean,  
5 we've got a tremendous amount of benefit --  
6 Q. Okay. Let's -- who paid for your hotel or  
7 retreat state to Eleuthera?  
8 A. It was paid for by -- by Associated Television  
9 as part of the retreat, like they paid for the rest of  
10 the celebrities.  
11 Q. And do you know how much they paid?  
12 A. I don't. I don't. I was just there working  
13 it for the NRA, trying to recruit celebrities, meet  
14 donors.  
15 Q. My question, Mr. LaPierre, was who paid for  
16 your stay?  
17 A. They paid -- they paid for that.  
18 Q. Who paid for the food?  
19 A. They paid for it.  
20 Q. Who paid -- (audio unclear.)  
21 (Reporter clarification.)  
22 Q. (BY MR. SHEEHAN) Who paid for the transfers  
23 from the airport to the hotel?  
24 A. On a celebrity retreat, they paid -- they paid  
25 for all of that.

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1 Q. What was the name of the hotel you stayed at  
2 in Eleuthera?  
3 A. I can't remember.  
4 Q. You were there from 12/29/2015 to 1/05/2016.  
5 Is that correct?  
6 A. I -- I don't know that that's accurate or not.  
7 I was there at the time the celebrities were there.  
8 Q. So you were there for a week. Is that  
9 correct?  
10 A. Yeah, probably.  
11 MR. GARMAN: Hold on. Objection to form,  
12 misstates his testimony.  
13 Q. (BY MR. SHEEHAN) You were there from  
14 December 29, 2015 to January 4, 2016. Correct?  
15 A. Spending time -- spending time with all those  
16 celebrities, building relationships, talking with  
17 potential donors, other people important to NRA's  
18 future.  
19 Keep in mind, we got a tremendous benefit out  
20 of these celebrity relationships, whether it's Charlton  
21 Heston, whether it was --  
22 Q. Charlton Heston was dead for ten years when  
23 this trip was taken. Right?  
24 A. I'm not talking about him. I said we get  
25 tremendous benefit out of these celebrity relationships.

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1 Q. But my question for you was how long -- how  
2 long were you in Eleuthera in that -- in that time  
3 period?  
4 A. I think I -- well, I was -- I was probably  
5 there from the 29th to the 4th, when I had a trip to  
6 Dallas to go to the Dallas Safari Club and the Weatherby  
7 Gala and all of that.  
8 Q. I'm sorry. Do that again. I don't understand  
9 that answer.  
10 A. I said I was -- I was there during those  
11 dates, and then I flew to Dallas to do the Weatherby  
12 convention, the Weatherby board meeting and the Dallas  
13 Safari Club meetings. And -- and my wife hosted a  
14 luncheon down there for the Women's Leadership and did  
15 all kinds of things during the Dallas Safari Club  
16 meeting with -- with Women's Leadership Forum people.  
17 Q. Did you disclose the Eleuthera trip paid for  
18 by Associated Television on your conflict of interest  
19 forms for 2015?  
20 MR. GARMAN: Objection to form.  
21 A. No. It was pure business is what I was doing.  
22 It wasn't -- wasn't vacation or anything else. It was  
23 pure business.  
24 Q. (BY MR. SHEEHAN) In Eleuthera at New Year's  
25 Day?

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1 A. Yes.  
2 Q. Okay. And did you consider -- did the NRA  
3 consider whether it should pay for the trip as opposed  
4 to a vendor?  
5 MR. GARMAN: Objection as to form.  
6 A. I don't know. They didn't mention it to me.  
7 I mean, I was doing NRA business totally, which is why I  
8 was there. NRA needs access into the celebrity  
9 community, and Associated Television, after we lost  
10 Heston, was one of our last access points into the  
11 celebrity community out there, because they actually  
12 employ a lot of actors and have relationships with a lot  
13 of actors in the celebrity community. And I was there  
14 recruiting celebrities for the NRA and building  
15 relationships for the NRA that the NRA benefitted from.  
16 I mean, I'll give you an example. Montel Williams --  
17 Q. (BY MR. SHEEHAN) No, we did that last time.  
18 Tell me, do you do a return on investment for  
19 the trips that you take to recruit celebrities and  
20 NASCAR people and pro football players?  
21 MR. GARMAN: Objection to form.  
22 A. You know, it's not a science. It's an art. I  
23 mean what's the worth of Erik Estrada, you know, being  
24 willing to run for the board of directors of the NRA and  
25 do Eddie Eagle spots for the NRA or do a Crime Strike

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1 for the NRA or, you know, make appearances or Montel  
2 Williams or, you know, in another arena Tom Selleck. I  
3 mean, all of these cultural bounce points that influence  
4 American society are tremendously important if you want  
5 to win in today's modern world. I mean, our society is  
6 influenced by the celebrity community --  
7 Q. (BY MR. SHEEHAN) Okay.  
8 A. -- by the NASCAR community and --  
9 Q. Sir, I had a very simple -- I had a very  
10 simple question, though. Did you do any kind of  
11 evaluation of return on investments for these trips that  
12 you take?  
13 MR. GARMAN: And Counsel, he was  
14 answering your question to that point.  
15 Q. (BY MR. SHEEHAN) It's a yes/no question. Do  
16 you?  
17 MR. GARMAN: No, it's not. Go ahead and  
18 answer.  
19 A. I said it's an art, not a science. What if  
20 NRA has no access into the celebrity community, into  
21 NASCAR, into country music? I mean, how much of a loss  
22 is all of that to this organization's ability to sustain  
23 itself and to -- to be part of American culture and  
24 continue to win? I mean, I built this association to  
25 where it was over 5 million members, raised between

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1 \$300 million and \$400 million a year, had 130,000  
2 instructors, 14,000 law enforcement instructors and won  
3 everything in sight from a legislative standpoint for  
4 virtually the last 30 years. I mean, you do this by  
5 keeping NRA in the mainstream of American culture  
6 where -- where it's not on the fringe, and -- and -- and  
7 this is one of the ways you do it. This is a good  
8 thing, not a bad thing.  
9 Q. (BY MR. SHEEHAN) Okay. So let's go to number  
10 12, the personal trip. How did the -- it says personal  
11 trip, but flew charter per NRA security requirements.  
12 Sterners joined at no additional cost to NRA.  
13 How do you know that, that they joined at no  
14 additional cost?  
15 MR. GARMAN: Objection to form.  
16 Objection to foundation.  
17 Go ahead.  
18 Q. (BY MR. SHEEHAN) Mr. LaPierre?  
19 A. When Susan goes, it's always a combination of  
20 business and personal. I mean, I -- I mean, she had  
21 both reasons to be there. Whenever she met with -- the  
22 part about going to -- which is why Susan was in  
23 Milwaukee. It was part business and part -- part  
24 personal. But why we stopped in Kearney on the way  
25 back to pick up Colleen and Sienna and to fly to The

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1 Bahamas -- and that was the part that was -- you know,  
2 the security retreat, Susan and Colleen meeting --  
3 meeting down there. And you know, it was a place to be  
4 secure with my family when there was hardly any other  
5 place to be secure with my family.  
6 Q. Okay. But let's -- let's go back. You say  
7 here the Sterners joined -- or did you say the Sterners  
8 joined at no additional cost to the NRA?  
9 MR. GARMAN: Objection to form.  
10 Go ahead.  
11 A. We flew from Milwaukee to pick them up in  
12 Kearney, Nebraska, and then flew on to -- to Nassau.  
13 Q. (BY MR. SHEEHAN) So why is it that only  
14 37,000 -- of the 37,000, only 4,610 is a reimbursement  
15 amount?  
16 A. I didn't -- I wasn't involved in that  
17 calculation.  
18 Q. Okay. Number 12, this is a Nassau to  
19 Minneapolis to Kearney to Washington. The LaPierre's  
20 believe that the first Minneapolis leg of this trip did  
21 not occur.  
22 Is that true that you believe this did not  
23 occur?  
24 A. That's correct. I think what we did is we  
25 dropped off the Sterners in Kearney, and then I flew --  
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1 we flew -- Susan and I flew on to Minneapolis to attend  
2 the Starkey Weekend Gala that they have where they have  
3 all kinds of celebrities, and NRA had a deal with the  
4 Starkey Hearing Foundation to provide hearing aids to  
5 shooters and hunters at a very low cost as part of its  
6 Affinity relationship. And NRA attended that gala and  
7 receptions and all of that surrounding the gala at the  
8 Austin's house as part of its Affinity relationship with  
9 Starkey and to meet celebrities and to recruit donors.  
10 MR. SHEEHAN: Let's go off the record for  
11 a minute.  
12 THE VIDEOGRAPHER: Off the record, the  
13 time on video is 3:59 p m.  
14 (Break from 3:59 p m. to 4:05 p m.)  
15 THE VIDEOGRAPHER: We're back on the  
16 record. The time on the video is 4:05 p m.  
17 Q. (BY MR. SHEEHAN) Mr. LaPierre, what  
18 documentation went to the treasurer's office to justify  
19 each of these trips at the time the invoices were paid  
20 apart from the invoice itself?  
21 MR. GARMAN: Objection to form.  
22 Go ahead.  
23 A. I don't know what documentation went to the  
24 treasurer's office. I mean, what I did is submit  
25 expense accounts on my trips.  
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1 Q. (BY MR. SHEEHAN) But your expense accounts  
2 did not include the air trips. Correct? They didn't  
3 include the airfare?  
4 A. It didn't include the airfare, that's correct.  
5 Q. So the treasurer, when paying these invoices,  
6 had no documentation to support the business purpose of  
7 these trips?  
8 MR. GARMAN: Objection to form.  
9 A. You would have to ask the treasurer's office  
10 what they did on that. I don't know what they did --  
11 Q. (BY MR. SHEEHAN) But you yourself -- I'm  
12 sorry, go ahead.  
13 A. No, I just gave you the answer. I mean, you'd  
14 have to ask the treasurer's office what they did on it.  
15 Those bills did not come to me. They went to the  
16 treasurer's office.  
17 Q. And you did not submit anything to the  
18 treasurer's office to justify or explain or support the  
19 air -- the air travel. Correct?  
20 MR. GARMAN: Objection to form.  
21 A. I submitted my expense accounts as to what I  
22 was doing with the NRA.  
23 Q. (BY MR. SHEEHAN) But not to the treasurer's  
24 office. Right?  
25 A. Well, to the -- to the ILA fiscal office,  
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1 which is the same thing as the treasurer's office.  
2 Q. It is?  
3 A. Well, yeah. It's -- yeah. They work for the  
4 treasurer's office, the ILA fiscal's office does.  
5 Q. When Portia Padilla was signing off on these  
6 invoices, right, as the accounts payable person, did she  
7 have the ILA stuff that you had submitted before her in  
8 order to pay them?  
9 A. I don't --  
10 MR. GARMAN: Objection to form.  
11 A. I don't know the answer -- I don't know the  
12 answer to that.  
13 Q. (BY MR. SHEEHAN) Okay. Does this document,  
14 which is Exhibit 3, list every single air trip you took  
15 between 2015 and 2020?  
16 A. I think it does.  
17 Q. All right. And why did it start at 2015? Why  
18 didn't it go back beyond 2015?  
19 MR. GARMAN: Objection to form.  
20 A. It started when NRA started it. That's why  
21 they started there. I didn't start it. They did as  
22 part of their -- part of their review.  
23 Q. (BY MR. SHEEHAN) Who at the NRA?  
24 A. I don't know who started it at the NRA. I  
25 mean, one of the -- I don't know who -- I don't know who  
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1 started it. I didn't start it, I know that.  
2 Q. Did you ask why they didn't include the  
3 pre-2015 flights?  
4 A. I didn't --  
5 MR. GARMAN: Objection to form.  
6 I instruct you not to answer to the extent --  
7 (audio unclear.)  
8 (Reporter clarification.)  
9 MR. GARMAN: I said I instruct you not to  
10 answer to the extent the "they" he is referring to is a  
11 lawyer.  
12 Q. (BY MR. SHEEHAN) Do outside counsel,  
13 Mr. LaPierre, get to make decisions about -- does  
14 outside counsel get to make decisions on behalf of the  
15 NRA?  
16 MR. GARMAN: Objection to form.  
17 Go ahead.  
18 A. No. I mean, outside counsel does not run the  
19 NRA. I am charged by the board of directors with  
20 managing the NRA on a day-to-day basis working for the  
21 board of directors.  
22 MR. SHEEHAN: Can we go to the Ackerman  
23 letters, please?  
24 Q. (BY MR. SHEEHAN) Mr. LaPierre, did you know  
25 that there was no examination by anyone at the NRA of  
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1 Woody Phillips' Amex charges before he left the  
2 organization at the end of 2018?  
3 MR. GARMAN: Objection to form.  
4 Objection to foundation.  
5 A. I did not know that.  
6 Q. (BY MR. SHEEHAN) Okay. Would you agree with  
7 me as part of a 100 percent review of compliance by the  
8 organization, that someone should have looked at Woody  
9 Phillips' Amex charges during the time before he left  
10 the organization?  
11 MR. GARMAN: Objection to form.  
12 Go ahead.  
13 A. I think as looking at -- as part of the  
14 reviews, I think the NRA was going through and looking  
15 at everything. I think that -- I don't know -- I have  
16 no idea why or why not they didn't look -- that anyone  
17 didn't look at Woody's Amex charges. In fact, I don't  
18 even know that that's not even true, to tell you the  
19 truth. I just don't know.  
20 Q. (BY MR. SHEEHAN) So you have no idea, sitting  
21 here today, whether anyone ever looked at Woody  
22 Phillips' Amex charges for the time period before he  
23 left the NRA?  
24 MR. GARMAN: Objection, asked and  
25 answered.  
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1 A. I don't.  
2 Q. (BY MR. SHEEHAN) Okay.  
3 A. I have no idea. I think there -- no.  
4 Q. Go ahead.  
5 MR. GARMAN: No, there's no question  
6 pending.  
7 Q. (BY MR. SHEEHAN) If you examine -- can you  
8 pull up Exhibit 4?  
9 (Exhibit 4 marked.)  
10 (Exhibit 5 marked.)  
11 Q. (BY MR. SHEEHAN) Do you have Exhibit 4 up?  
12 A. Yes.  
13 Q. Already. Mr. LaPierre, do you recall  
14 receiving this letter from Mr. William Winkler at  
15 Ackerman McQueen?  
16 A. I'm reading the letter right now.  
17 You know --  
18 MR. GARMAN: There's no question pending.  
19 Or the question was do you remember receiving this  
20 letter?  
21 A. I don't remember specifically receiving this  
22 letter, but I remember like back when Ackerman McQueen,  
23 we had sued them in order for --  
24 Q. (BY MR. SHEEHAN) Mr. LaPierre, the question  
25 was do you remember receiving this letter? And your  
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1 answer was no, you don't?  
2 A. I don't remember receiving this letter, but I  
3 remember hearing about this letter and --  
4 Q. All right. If you look at the third paragraph  
5 it says, At your request we issued an American Express  
6 Card and agreed to the travel fee from II and IS.  
7 Is that statement in this letter that is  
8 Exhibit --  
9 MR. SHEEHAN: 4, Jonathan?  
10 MR. CONLEY: Yes.  
11 Q. (BY MR. SHEEHAN) -- Exhibit 4? Correct?  
12 MR. GARMAN: Objection to form.  
13 Go ahead.  
14 A. I don't think -- I didn't have anything to do  
15 with the negotiation with the II, IS contract, whatever  
16 that part was with -- if there was a part with Ackerman.  
17 Q. (BY MR. SHEEHAN) Okay.  
18 A. In fact, because I remember when Ackerman was  
19 trying to get II, IS filed, I'm like why the hell do  
20 they have any right to those files? I mean, what do  
21 they have to do with it? So --  
22 Q. So let me go back a second. Let me ask you  
23 this. Did they issue an American Express credit card?  
24 A. You know, when I did their deposition, I did  
25 not remember anything about that card. I think -- I  
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1 think now that -- because I thought about that for a  
2 long time. I think that what happened is when I was  
3 getting hacked and every -- all of our credit cards were  
4 getting hacked, and Ackerman McQueen had arranged a trip  
5 to Italy to film the Berettas, with Monique and Ugo  
6 Beretta and spend a week there with them, filming them  
7 and interviewing them. I think they provided an  
8 Ackerman credit card, because all of mine were being  
9 hacked at that time; and when I got back, I gave it back  
10 to them. And -- because I didn't want it. I didn't  
11 want to put my expenses on their credit card.  
12 And I don't know the rest of that letter to be  
13 true, to tell you the truth. I haven't seen the  
14 documents on that. I don't know that that to be true.  
15 I do know the fact that -- that part of this contains  
16 the complete lie from Ackerman, which is why I don't  
17 know -- to tell the truth, when Ackerman opens its  
18 mouth, I don't know whether they're telling the truth or  
19 lying because they lie so much these days.  
20 Take this part in here about the apartment  
21 for -- for Ms. Allen. Please provide the business  
22 relationship with Ms. Allen. They know darn well the  
23 whole truth on that. She was the daughter of a fire  
24 chief in Great Falls, Virginia, that the fire chief  
25 asked me, said -- after he was at the swattings and the  
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1 hacking -- the swattings at the house, and then the  
2 house got hit by lightning and it caught on fire. He  
3 came out, and he said, By the way, I have a daughter at  
4 Radford. She's a junior. She loves the NRA. She loves  
5 communications. Do you have any internships available?  
6 And I said, sure, we'll interview her.  
7 And we interviewed her, and she turned out to  
8 be fabulous. We not only wanted to give her an  
9 internship, we wanted to hire her when she graduated.  
10 But it was too late to get university housing, so I was  
11 in my office talking about this with -- and Nader  
12 Tavangar, who works for Ackerman --  
13 Q. If I could, Mr. LaPierre, I don't think I  
14 asked you about the apartments. What I --  
15 MR. GARMAN: But you did ask him about  
16 the letter, and he is trying to complete his answer.  
17 A. It's relevant because you can't believe  
18 anything Ack-Mac says. They took advantage of the NRA  
19 we now know. We now believe they took advantage in  
20 billing. They took advantage in things like double  
21 billing of parking, employees. And this -- one of  
22 their -- and this is a good example of why you can't  
23 believe it. Nader Tavangar, when we were talking about  
24 where we were going to put this intern, we were going to  
25 put her a month working for NRA upstairs, a month at  
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1 ILA, and a month down at Ackerman.  
2 Q. (BY MR. SHEEHAN) Okay.  
3 A. And the Nader goes, I know what apartment we  
4 can get her. He said -- and we said, well, do it.  
5 Ackerman got her the apartment. And they know for a  
6 fact that she was an intern. She worked there. And  
7 Ackerman puts out this smear implying that I have a  
8 relationship with her, and the poor girl ends up on  
9 television with a picture of her in a swimsuit next to a  
10 picture of me in a suit and then smears --  
11 Q. (BY MR. SHEEHAN) What does is this --  
12 A. -- me.  
13 Q. Okay. Look, this is filibustering.  
14 Did you charge on the American Express credit  
15 card at -- that Ack-Mac had your Budapest trip?  
16 A. Yes. That was part of that Italy trip, and I  
17 went for two days, and I think that went on the Ack-Mac  
18 card. And I visited that military arms museum there and  
19 talked to them about exchanging -- doing an exchange  
20 with our museum on firearms. Yes, I think that went on  
21 the Ackerman card.  
22 Q. Okay. Did you submit any business  
23 justification to Ackerman concerning those Budapest  
24 charges?  
25 MR. GARMAN: Objection to form.  
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1 Go ahead.  
2 A. I think it was just -- everything was so crazy  
3 at that time and busy. I just came back and kept on  
4 working, and nobody ever brought it up. They didn't ask  
5 for any, and I -- you know, the main reason I was there  
6 was for the Italy trip.  
7 MR. SHEEHAN: Okay. Let's do this.  
8 Let's take a ten-minute break.  
9 And can the videographer let us know where we  
10 are on time?  
11 THE VIDEOGRAPHER: Yes. We're going off  
12 the record. The time on the video is 4:21 p m.  
13 (Break from 4:21 p m. 4:42 p m.)  
14 THE VIDEOGRAPHER: We're back on the  
15 record. The time on the video is 4:42 p m.  
16 Q. (BY MR. SHEEHAN) Mr. LaPierre, can you  
17 examine Exhibit 6, please?  
18 (Exhibit 6 marked.)  
19 A. Yes. I'm looking at it right now.  
20 Q. (BY MR. SHEEHAN) All right. Is the check  
21 which is attached to -- is the check which is attached  
22 to Exhibit 6, is that your personal check?  
23 A. It is.  
24 Q. All right. Can you explain to me -- let me go  
25 back. Did you submit the Mosquito Authority bill and  
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1 check to the NRA for payment?  
2 A. Yes, I did.  
3 Q. Okay. Can you explain why mosquito control  
4 would be a security item --  
5 A. Sure.  
6 Q. -- for purposes of reimbursement?  
7 A. Sure.  
8 Because we have securities guys at the house  
9 24 hours a day, and they walk around outside. And our  
10 house basically backs up -- it is a hill that goes down  
11 and water accumulates there and just kind of sits there  
12 like a swamp, and the area around our house is swarmed  
13 with mosquitos. So for these security guys -- not for  
14 us personally, but for the security folks who walk  
15 around outside, we had it sprayed for mosquitoes so they  
16 wouldn't get eaten -- bitten to death by mosquitoes  
17 while they were doing their job. And the security guys  
18 used to have me put this on my personal expenses. When  
19 it transferred -- Jim Staples has now switched it over  
20 to the point where his office pays for it directly, the  
21 director of security.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 Q. And how much does the NRA spend on that per  
13 year for security at your estate?  
14 A. I don't know. It started --  
15 MR. GARMAN: Objection to form.  
16 A. I don't know.  
17 Q. (BY MR. SHEEHAN) Is that a separate budget  
18 item in the NRA budget for security?  
19 A. It's in -- it would be in Jim Staple's budget  
20 as security director.  
21 Q. Have you ever had a perimeter breach at your  
22 estate?  
23 A. Yes, we sure have. We have had -- we've been  
24 swatted. I've been out there in the middle of the night  
25 with my hands up in the air and 20 police officers --

[REDACTED]

1 this is before the security guys started coming to the  
2 house. 20 swat team guys coming at me with their guns  
3 pointed straight at me. Get down on your knees, get  
4 down on your knees. I mean, my wife thinking that --  
5 going please, Don't go outside. They're going to shoot  
6 you. Someone -- thinking it wasn't the police. I mean,  
7 it was horrible.  
8 We've had other people come out to the house  
9 with cameras, trying to film through the windows and  
10 everything else. People coming out just to harass. I  
11 mean, we've had all kinds of issues.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q. And --  
9 A. That is hired by the director of security.  
10 Q. Does anyone else review the contract with the  
11 security company besides the director of security?  
12 MR. GARMAN: Objection to form.  
13 Go ahead.  
14 A. The -- you'd have to ask the director of  
15 security. I assume the treasurer's office works with  
16 them on it. Probably the legal -- legal office works  
17 with them on it. I haven't ever seen -- I haven't seen  
18 the contract, I don't think. Our legal people -- legal  
19 general counsel's office usually works on those  
20 contracts.  
21 Q. (BY MR. SHEEHAN) When you said your credit  
22 cards were hacked, did you make a police report?  
23 A. Oh, yes. I got an FBI file. In fact, I've  
24 had all kinds of -- I got to know a bunch of the FBI  
25 guys as a result of all the stuff that was happening to

[REDACTED]

1 me. And in fact, the FBI actually put at least one or  
2 two of the -- actually, maybe even three of the people  
3 that harassed me in jail. I continue to get victim  
4 letters from the FBI as to when this person was released  
5 or this person was on parole. Absolutely. I mean, the  
6 FBI even -- agent even said to me, he said, if the IRS  
7 ever gives you a hard time on any of your security, he  
8 goes, show them your FBI file. He says, that will make  
9 it good.

10 Q. Okay. Switching topics to Ms. Millie Hallow.  
11 What is Ms. Hallow's current title at the NRA?

12 A. It's something like senior advisor to the EVP  
13 or something like that. I don't know exactly what it  
14 is. Executive assistant, something like that.

15 Q. Managing director?

16 A. That sounds correct. It could be that.

17 Q. Okay. Can you explain to me why she billed  
18 the NRA for her son's wedding in 2012?

19 MR. CORRELL: Objection to the form.

20 MR. GARMAN: Objection to the form.

21 Go ahead.

22 MR. CORRELL: Slow down.

23 A. I think the first I heard -- well, I don't  
24 know how to answer the question in short form. If you  
25 want me to run through --

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1 Q. (BY MR. SHEEHAN) Let me take you up on that.  
2 When did you first learn that Millie Hallow had charged  
3 the American Express card for her son's wedding in 2012?

4 MR. CORRELL: This is Kent Correll.  
5 Objection, form.

6 A. I think the first time I heard anybody talking  
7 about that was when I think -- I think Tony Macerich and  
8 Josh Powell said something about it, and I just assumed  
9 that -- I know that neither one of them like her. They  
10 really disliked her. I don't think she particularly  
11 liked them either. And I just assumed that -- I didn't  
12 know whether it was true or not true.

13 I did go and ask Millie about it. I went  
14 directly to her and said, look, I have heard this rumor  
15 that, you know, somehow you billed some of your wedding  
16 to -- of your son's wedding to the NRA.

17 And Millie said, absolutely not, that's  
18 completely untrue. She goes, in fact, it's completely  
19 untrue.

20 And she denies the whole thing. And she even  
21 mentioned something about -- because there was some guy  
22 named Erickson. And I said -- and she says, no, my son  
23 doesn't even like Erickson. He hates Erickson.

24 And I just -- you know, she's a long-time  
25 person here that -- you know, I thought she was telling

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1 the truth, and I believed her when she told me it wasn't  
2 true. I believe that -- that what Tony and Josh were  
3 saying was just based out of a personal dislike. And  
4 they really didn't have any -- I didn't see any real  
5 documentation to back up what they were saying or  
6 anything like that, so I just assumed what she was  
7 telling me was true and went on with my business.

8 Q. (BY MR. SHEEHAN) And do you know what year  
9 that conversation took place?

10 A. I think that would have been sometime in 2018.  
11 Now -- I'll let you ask it, but there's the rest of the  
12 story.

13 Q. So you asked Ms. Hallow whether the story  
14 about her billing the NRA for her son's wedding was  
15 true. Did you ask anyone else for documents relating to  
16 the credit card charges for the son's wedding?

17 A. I didn't hear it was on our credit card or  
18 anything like that. I just heard the story that somehow  
19 these guys were saying that somehow she billed her  
20 wedding to the NRA, and I just -- I believed her when  
21 she told me that it was completely untrue.

22 Q. Did you ask anybody for backup documentation  
23 to see if it was true?

24 A. No. I just believed this person that I worked  
25 with a long time. And I knew that Tony didn't like her,

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1 and I knew that Josh didn't like her. So I honestly  
2 just assumed it was part of the stuff that goes around  
3 with people not liking each other when the rumor mill  
4 that flies around this place.

5 Q. Did you believe that Josh and Nader were lying  
6 about the wedding?

7 MR. GARMAN: Objection as to form.

8 A. Oh, I don't remember Nader being involved.

9 Q. (BY MR. SHEEHAN) I'm sorry. Who --

10 A. I thought it was Tony Macerich.

11 Q. Did you believe that Tony --

12 MR. GARMAN: Objection as to form.

13 A. I thought there were just -- it was just a  
14 rumor they were saying because they didn't like Millie.  
15 And I -- you know, I did go immediately to ask her about  
16 it, and -- and she gave me the story that convinced me  
17 that she was telling the truth, and she looked me  
18 straight in the eye and I believed it.

19 Q. (BY MR. SHEEHAN) And it turned out that she  
20 was not telling the truth. Is that correct?

21 A. Correct. What happened is about a year later,  
22 sometime in 2019, this whole issue resurfaces again.  
23 And -- and at that point when it resurfaces again in  
24 connection with -- with Russia, I turned it over to the  
25 lawyers. I'm like, you need to investigate this. We

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1 need to get to the bottom of this and -- and find out  
 2 what the truth is.  
 3 And it turns out that -- that there was truth  
 4 in that, that -- that she -- she had billed part of the  
 5 wedding -- I think it was -- I think it was through this  
 6 guy Erickson, I think. Because I remember I read about  
 7 this Erickson stuff in the paper. And I'm like, who the  
 8 hell is -- what the hell is this with Maria Butina, this  
 9 Russian spy woman that -- and I'm trying to figure that  
 10 thing.  
 11 Anyway, the lawyers got to the bottom of it.  
 12 They figured that, yeah, some of this had been billed  
 13 improperly. We discussed -- I discussed with the --  
 14 MR. GARMAN: I am just going to  
 15 instruct -- sorry to interrupt, but I just want to  
 16 instruct you not to disclose the substance of any  
 17 communications with lawyers.  
 18 A. Well, the bottom line is we told her you're  
 19 either going to pay back \$40,000 or you're going to get  
 20 fired. And she was -- I discussed it with the officers.  
 21 I discussed it with the special litigation committee as  
 22 to -- and she was -- she was a two-time cancer survivor  
 23 and -- well, there's also a discussion with the --  
 24 THE WITNESS: Can I talk about the other  
 25 issue in terms of what --

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1 A. I mean, there's evidence that she actually was  
 2 intending to pay it back before, and then she came down  
 3 with cancer and -- and ended up dealing with the cancer  
 4 situation. And what that led to was a belief on the  
 5 part that -- in terms of our judgment as to what was  
 6 best for the NRA in this situation, either let her pay  
 7 it back -- if you don't pay it back, you're going to be  
 8 fired, but if you pay it back -- because she does do a  
 9 lot of really good work for the NRA. She does great  
 10 work in terms of liaison with the board, in terms of the  
 11 conservative community, in terms of donors. All these  
 12 people love her. I mean, they really think the world of  
 13 her, and she's done a lot of good there. So she's a  
 14 valued employee from that standpoint.  
 15 But it was also very clear, based on the fact  
 16 that there's evidence she was intending to pay it back,  
 17 that there was a very good probability the organization  
 18 was going to face litigation if we -- if we outright  
 19 fired her rather than accept just the payback, which was  
 20 going to significantly burden the organization with  
 21 cost. And there was a fair chance that she would  
 22 actually win that lawsuit. And so --  
 23 Q. (BY MR. SHEEHAN) You said there was a  
 24 substantial -- I'm sorry. Keep going. Go ahead.  
 25 A. No. I mean, that would involve the

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1 discussions with the law firm that I don't think I'm  
 2 supposed to talk about.  
 3 Q. Okay.  
 4 A. But --  
 5 Q. Okay. Let's do this. When did the demand --  
 6 when was the demand made upon Millie Hallow to pay the  
 7 money back?  
 8 A. Sometime over the last five, six -- five  
 9 months or so. I don't know exactly when.  
 10 Q. All right. Have you ever heard the term  
 11 "serial laronist" used to describe Ms. Hallow?  
 12 A. Yeah. Well, I'm sorry. I jumped to "serial  
 13 laronist," not -- and then you added Ms. Hallow.  
 14 MR. GARMAN: Objection to form.  
 15 Go ahead.  
 16 A. I've heard the term "serial laronist."  
 17 Millie was involved in a situation, I think,  
 18 in 2010, '11, something like that, maybe before that,  
 19 maybe going back way even before that, where someone was  
 20 alleging that she had committed a fraud involving  
 21 expenses.  
 22 Pricewaterhouse actually hired a fraud --  
 23 well, a fraud investigative team and put it on the case  
 24 and investigated the entire thing and came back with a  
 25 conclusion that she had not committed fraud and then

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1 made some recommendations on tightening some NRA  
 2 controls, which I believe were tightened after that.  
 3 Q. (BY MR. SHEEHAN) Was that before 2010?  
 4 A. You know, I can't -- Mr. Sheehan, I can't  
 5 remember exactly when the date was. I can find out for  
 6 you. I just don't remember. It was -- I just don't  
 7 remember when the date was.  
 8 Q. Okay. Did you know about Ms. Hallow's prior  
 9 criminal conviction for embezzlement?  
 10 A. I did not.  
 11 MR. GARMAN: Objection to form.  
 12 Q. (BY MR. SHEEHAN) When did you find out about  
 13 her prior conviction for embezzlement?  
 14 MR. GARMAN: Objection to form.  
 15 A. Without -- I read -- I read something in the  
 16 papers about it. So I -- that's the first I read about  
 17 it, was sometime over the last year something was in the  
 18 paper somewhere, without revealing any other  
 19 communication with counsel.  
 20 Q. (BY MR. SHEEHAN) Did you follow up to see if  
 21 it was accurate, that newspaper story?  
 22 A. It was -- from what I've read in the article,  
 23 it was 30 some years ago or something. I -- I did not  
 24 follow up to see whether it was accurate --  
 25 Q. When Ms. Hallow was approached to say you have

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1 to pay back the money, who made the approach to her?  
2 MR. GARMAN: Objection to form.  
3 Go ahead.  
4 A. That would -- would involve our legal  
5 counsel's folks, and I -- I would let them answer that.  
6 I didn't do it.  
7 Q. (BY MR. SHEEHAN) So you never went -- did you  
8 ever go back to Millie and say you lied to me about  
9 whether you spent the NRA money on your son's wedding?  
10 MR. GARMAN: Objection to form.  
11 A. You know, she since then has been coping with,  
12 as I said, recovering for a second time from cancer.  
13 Her husband's been terribly sick and has passed away.  
14 And I -- I didn't go back and beat her up on that. I  
15 let -- I let the fact that we told her you're either  
16 going to pay this back or you're going to be fired, and  
17 she agreed to pay it back. I mean, I thought that sent  
18 the message enough.  
19 Q. (BY MR. SHEEHAN) What is her title now?  
20 MR. GARMAN: Objection to form.  
21 A. I don't think her title has been changed.  
22 Q. (BY MR. SHEEHAN) Has her salary been changed?  
23 A. I don't think it has. It hasn't.  
24 Q. Earlier today you said that actions have  
25 consequences, and if you find anybody who violates your  
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1 compliance program and your policies and bylaws, those  
2 actions will have consequences.  
3 MR. GARMAN: Objection to form.  
4 Q. (BY MR. SHEEHAN) Is there an exception for  
5 Millie Hallow?  
6 A. No, there's not. We demanded that she pay  
7 back the 40,000 or she would be fired.  
8 And the other thing we've done is we've put  
9 additional controls on her to the point where there is  
10 zero chance she could get away with anything like that  
11 again.  
12 Q. And previously --  
13 A. There's multiple layers.  
14 (Reporter clarification.)  
15 Q. (BY MR. SHEEHAN) I think Mr. LaPierre, she  
16 wants you to give the last couple of words that you used  
17 there.  
18 A. We have multiple layers of control on that to  
19 the point where there is no chance that could happen  
20 again.  
21 And the other thing I did on all of this was  
22 consulted with the three officers as to how we should  
23 handle this situation also.  
24 Q. Do you --  
25 A. And that's the legal part that I talked about  
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1 in terms of the potential of the NRA being sued if we  
2 went to an outright just firing of her.  
3 Q. When you say that you talked to the three  
4 officers, are you talking about the president and two  
5 vice presidents, or are you talking about the general  
6 counsel, the director of operations and the treasurer?  
7 A. Carolyn Meadows and Charles Cotton and Willes  
8 Lee.  
9 Q. And what did they say?  
10 A. I think they went along with she's got to pay  
11 back the money.  
12 Q. And what about firing her?  
13 A. I think all of them realized the health  
14 situation she's dealing with and everything else, and if  
15 she paid back the money, that was okay.  
16 Q. And the -- how did you disclose to other NRA  
17 employees the fact that an employee had been discovered  
18 embezzling \$40,000 and she was allowed to pay the money  
19 back without any other discipline?  
20 MR. GARMAN: Objection to form.  
21 A. Well, we didn't do any type of building  
22 announcement or anything like that. I mean, we dealt  
23 with the issue, and you know, it -- we dealt with the  
24 issue.  
25 Q. (BY MR. SHEEHAN) And one of the controls in  
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1 place -- let me go back.  
2 Wasn't Millie Hallow after the wedding event,  
3 before 2020, told that she could not have an American  
4 Express credit card with the NRA?  
5 MR. GARMAN: Objection to form.  
6 Go ahead.  
7 A. I don't know whether that she was or was not.  
8 Q. (BY MR. SHEEHAN) Isn't it true that she put  
9 expenses through on Woody Phillips' credit card that  
10 were billed to the NRA that were her personal expenses?  
11 MR. GARMAN: Objection to form.  
12 A. I don't know whether that's true or not true.  
13 Q. (BY MR. SHEEHAN) Okay. How much did  
14 Mr. Brewer's firm get paid in 2020 from the NRA?  
15 A. I don't know exactly. I think it's probably  
16 in the range of --  
17 THE WITNESS: Could I ask my counsel  
18 whether it's okay to answer this question.  
19 MR. GARMAN: Yeah, it's money. It's your  
20 money.  
21 A. I think it's probably somewhere in the range  
22 of 15 to 20 million, somewhere in there.  
23 Q. (BY MR. SHEEHAN) For the entire year of 2020,  
24 it was 15 to 20 million?  
25 A. I -- again, I would need to go back and check  
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1 the budget. I'm not exactly sure, but -- I have to  
 2 check with the treasurer's office exactly how much they  
 3 pay. I spend more time raising money, trying to raise  
 4 money for the organization, this 300 to 400 million a  
 5 year, than I do in terms of dealing with, you know, the  
 6 invoices and all of that type stuff. I mean, Frazer  
 7 could answer that question probably like that.  
 8 Probably, I'm sure, our treasurer could answer it like  
 9 that. I think it's probably close to 20 million,  
 10 something like that.  
 11 Q. In 2019, the NRA, according to the document  
 12 you signed, said it had a total revenue of \$291 million.  
 13 Is that -- is that accurate?  
 14 MR. GARMAN: Objection to the form.  
 15 A. I think that -- I think that's fairly accurate  
 16 because -- yeah. You're talking about 2019?  
 17 Q. (BY MR. SHEEHAN) Yes, sir.  
 18 A. I don't have it in front of me. I mean, that  
 19 sounds perfectly possible. I mean, we were -- yeah.  
 20 Q. So you told me you're more focused on raising  
 21 money than on spending it on -- governing -- well, let  
 22 me rephrase that.  
 23 You were more focused on the raising money  
 24 side. So how much did the NRA raise in 2020?  
 25 MR. GARMAN: Objection to form.

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1 Go ahead.  
 2 A. We -- in 2020, I think we raised -- total  
 3 would be -- well, our budget in 2020 was, I think, 241  
 4 million, and we -- we were in the positive by 33  
 5 million. Plus, we paid back the 5 million Foundation  
 6 loan. So, you know, you add that up, I think you would  
 7 get in the range of where we were.  
 8 Q. (BY MR. SHEEHAN) Okay. Do you get regular  
 9 reports on how much money is coming in and how much  
 10 money is going out at the NRA?  
 11 A. I worked throughout the last year with Craig  
 12 Spray virtually every week in terms of where are we on  
 13 revenue, where are we on expenses, how are we looking?  
 14 Something I never used to do in the past, to tell you  
 15 the truth, because I was just worried about raising  
 16 money and out there -- I've probably worked closer with  
 17 Craig over the last year, and now I'm working with Sonya  
 18 closer than I ever worked with the treasurer of the NRA  
 19 before. I just -- because of all the burdens that have  
 20 been put on this organization by -- a lot of this by New  
 21 York state and by the weaponized government and the  
 22 Affinity partner fallouts and the need to look for other  
 23 banking relationships and insurance relationships.  
 24 We've had a tremendous amount of costs coming into the  
 25 NRA that we've had to bear. And you know, we were -- at

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1 the end of -- in 2018 -- at the end of 2018, I mean, we  
 2 were -- we were struggling in terms of --  
 3 Q. Mr. LaPierre, let's go back to my question,  
 4 which is -- I asked you, I believe, how much you spent  
 5 in 2020 on the Brewer firm, and I believe your answer  
 6 was 20 million. In 2019, according to your 990, you  
 7 spent \$24.8 million. Is that accurate?  
 8 MR. GARMAN: Objection, form.  
 9 A. I'm sure -- I'm sure that's accurate. I said  
 10 I didn't have an exact figure. I would make it like an  
 11 estimate, yes.  
 12 Q. (BY MR. SHEEHAN) When did you first decide --  
 13 A. Whatever -- let me just add this.  
 14 If that -- those litigation fees help saved  
 15 the NRA from this weaponized attack by New York state on  
 16 this organization, it's the best money we ever spent.  
 17 Q. Okay. When did you first decide to file the  
 18 NRA for bankruptcy in Dallas?  
 19 MR. GARMAN: So you can answer this  
 20 question, but I instruct you not to answer to the extent  
 21 it invades the attorney/client privilege.  
 22 A. We had not made a -- and I had not made a  
 23 decision, final decision on that until literally the  
 24 12th, 13th, 14th of -- I think the 15th. It was  
 25 literally a couple of days -- a day or two before we

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1 filed on the 15th that I made the final decision to do  
 2 it, along with consulting with the three officers who  
 3 are the special litigation committee, which are Willes  
 4 Lee, Carolyn Meadows and Charles Cotton.  
 5 MR. GARMAN: I think you're on mute, sir.  
 6 Q. (BY MR. SHEEHAN) Did you ask Mr. Frazer for  
 7 his ideas and input on whether you should file for  
 8 bankruptcy?  
 9 MR. GARMAN: So no conversations with  
 10 Mr. Frazer on this subject, but you can answer whether  
 11 you asked him for his input or not.  
 12 A. I did not, because Mr. Frazer had largely  
 13 taken himself out of dealing with the special litigation  
 14 committee because he is involved in litigation with the  
 15 New York State Attorney General. And those discussions  
 16 were heavily involved with the special litigation  
 17 committee, so Mr. Frazer had kind of removed himself  
 18 from those conversations.  
 19 Q. (BY MR. SHEEHAN) But you did not remove  
 20 yourself from those conversations with the special  
 21 litigation committee. Correct?  
 22 A. Not on this issue, because it was -- it was  
 23 essential, if we were going to make this move, that in  
 24 my position as the day-to-day director of the NRA  
 25 working for the board and the NRA members ultimately,

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1 that I had to be involved in making this work if we were  
2 going to do it in terms of my position.  
3 So on all other issues involving the special  
4 litigation committee and the -- the litigation with New  
5 York or any of the litigation issues, I never get  
6 involved. I stay out of it, just like John did on this.  
7 I'm not involved in the discussions or the management in  
8 any way of NRA litigation.  
9 Q. I'm unclear, Mr. LaPierre, about why you  
10 believe that Mr. Frazer had removed himself from the  
11 consideration of the bankruptcy, but you did not.  
12 MR. GARMAN: Objection to the form of the  
13 question.  
14 A. Because he had. He didn't want to be involved  
15 with those conversations with the special litigation  
16 committee.  
17 Q. (BY MR. SHEEHAN) Does the special litigation  
18 committee have a charter?  
19 MR. GARMAN: Objection to the form of the  
20 question.  
21 A. They -- they are a -- they're not a  
22 presidential committee appointed by the president of the  
23 NRA. They are -- as a result of the January board  
24 meeting, they are now a full committee of the board of  
25 directors with the authority of the board behind them.

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1 Q. (BY MR. SHEEHAN) So -- but before January  
2 2020 -- before January 2021, they were a special  
3 committee?  
4 A. They were a special litigation --  
5 MR. GARMAN: Objection to form.  
6 Go ahead.  
7 A. They were a special litigation committee, but  
8 they did not have the specific delegation of authority  
9 by the board of directors with the full authority of the  
10 board behind them. They do now.  
11 Q. (BY MR. SHEEHAN) What kind of committee were  
12 they then if they were not a committee of the board  
13 before January 2021?  
14 A. Well, they were the three -- the three main  
15 officers that -- that when -- when the attorney general  
16 of New York included John Frazer and myself in the  
17 litigation, it was clear that I or John couldn't be  
18 involved in managing the NRA litigation and, therefore,  
19 it deferred to the three officers who stepped up to do  
20 it.  
21 Q. And prior to January 2021, what was the  
22 charter of those three officers, if any, as the special  
23 litigation committee?  
24 MR. GARMAN: Objection to form.  
25 A. They were -- I don't know that -- I don't know

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1 that there was a charter. I think they were acting in  
2 their capacity as the three officers of the NRA, primary  
3 officers of the NRA assuming that role.  
4 Q. (BY MR. SHEEHAN) Did -- would you agree with  
5 me that the bylaws do not allow a special committee to  
6 exercise authority without the express consent of the  
7 board?  
8 MR. GARMAN: Objection to form.  
9 A. Well, that's why the board at the January  
10 meeting officially gave the full weight of the board to  
11 the special litigation committee to -- to meet that  
12 provision of the bylaws.  
13 Q. (BY MR. SHEEHAN) And what was the date of  
14 the -- of the board vote on that issue, that is, the  
15 decision to create a special committee of the board?  
16 A. I believe -- I'm guessing. I think it was  
17 January 7th, something like that. I may be a day or two  
18 off. I think it was the 7th. It was -- I think it was  
19 the 7th. I think it was a Sunday.  
20 Q. Did the special litigation committee  
21 specifically approve the filing of bankruptcy?  
22 MR. GARMAN: Objection to form.  
23 A. I consulted with the special litigation  
24 committee, and they specifically approved the filing of  
25 the bankruptcy with me.

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1 Q. (BY MR. SHEEHAN) And when was that?  
2 A. We did it on January 15th.  
3 Q. And are there minutes of the meeting in which  
4 the -- they special litigation committee authorized the  
5 filing of the bankruptcy?  
6 MR. GARMAN: Objection as to form.  
7 A. No, we did it -- we did it with phone calls.  
8 Q. (BY MR. SHEEHAN) Right, but was that a  
9 committee meeting, the phone calls?  
10 MR. GARMAN: Objection to form.  
11 A. Well, it was the four of us on the phone  
12 together talking and coming to a conclusion.  
13 Q. (BY MR. SHEEHAN) So is it your belief that  
14 four people talking on the phone constitutes a committee  
15 meeting for purposes of authorizing bankruptcy?  
16 MR. GARMAN: Objection to form.  
17 A. Well, I wasn't trying to say it was a  
18 committee meeting. I knew -- but I met with the special  
19 litigation committee. It was -- the board at the  
20 January meeting delegated to the EVP's office the  
21 authority to reorganize the association if --  
22 Q. (BY MR. SHEEHAN) Including -- I'm sorry. Go  
23 ahead, Mr. LaPierre. I'm sorry.  
24 A. No. If they had not given me that delegation  
25 at that board meeting, I probably wouldn't have gone

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1 forward with or without the special litigation  
2 committee.  
3 Q. Did you --  
4 A. It was --  
5 Q. Okay. Did you use the word "bankruptcy" in  
6 the January 7th meeting at all in the discussions with  
7 the board?  
8 MR. GARMAN: Objection. It's the NRA's  
9 position that executive session is subject to privilege.  
10 But you can answer that question with the  
11 general board meeting.  
12 A. Well, the only part that I was in was the  
13 general board meeting when it didn't come up. I wasn't  
14 in the executive session. I -- because that involved  
15 contract -- on my contract, and I was out of the room.  
16 Q. (BY MR. SHEEHAN) Did you tell the special  
17 litigation committee that you were -- if you were given  
18 that authority, that you were planning to file for  
19 bankruptcy at the January 7th meeting?  
20 MR. GARMAN: Objection to form.  
21 A. No.  
22 Q. (BY MR. SHEEHAN) When did the special  
23 litigation committee first hear the word "bankruptcy"  
24 out of your mouth?  
25 MR. GARMAN: Objection to form.

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1 Go ahead.  
2 A. I think we -- I think we started talking about  
3 it after they -- the delegation of authority to  
4 reorganize the association. We started to have very  
5 serious discussions. I think -- I think before that  
6 meeting -- I'll correct myself. There may have been  
7 some discussion about reorganization with the officers  
8 and the SRC about, you know, the possibility of it, but  
9 nothing specific.  
10 Q. (BY MR. SHEEHAN) So the word "bankruptcy" was  
11 first uttered to you to the special litigation committee  
12 after January 7, 2021. Correct?  
13 MR. GARMAN: Objection to form.  
14 A. I -- I don't remember exactly when I first had  
15 conversation with them about Chapter 11. We may have  
16 had some discussions about it before -- before that  
17 meeting.  
18 Q. (BY MR. SHEEHAN) Did the special litigation  
19 committee know on January 15th that you planned to file  
20 a bankruptcy petition in Dallas on that day?  
21 MR. CORRELL: Objection to the form.  
22 This is Kent Correll.  
23 A. Yes, they did. I had consulted with them, and  
24 they were the -- they were -- they knew that -- they  
25 knew -- yes, I consulted with them.

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1 Q. (BY MR. SHEEHAN) And so they -- you're saying  
2 that each member of the special litigation committee  
3 knew that you were going to file a Chapter 11 petition  
4 in Dallas on January 15th before you filed it?  
5 A. Yes.  
6 MR. GARMAN: Objection as to form.  
7 A. That's correct. They knew we were going to do  
8 it that day.  
9 Q. (BY MR. SHEEHAN) And how far in advance did  
10 they know?  
11 A. Well, we really hadn't made a final decision  
12 until like the 14th or the 13th. I mean, we had been --  
13 look, I don't want to tell it again, but we had been  
14 discussing all of our options. I mean, it got to the  
15 point where we tried to work with New York state in  
16 2017, '18, '19. We didn't try to leave New York. We  
17 tried to self-correct everything in the organization --  
18 (audio unclear) -- New York not-for-profit law like  
19 General Schneiderman told us.  
20 It just became very apparent to us that what  
21 was happening with New York state is -- it wasn't in any  
22 way a fair playing field to us. It became completely  
23 clear to all of us, including other governors in other  
24 states that were calling us on the phone and begging us  
25 to move to their state.

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1 Q. Mr. LaPierre, can we focus on the issue at  
2 hand, which is the authorization by the -- anybody  
3 besides yourself to file for bankruptcy. So did anyone  
4 besides yourself authorize the NRA to file for  
5 bankruptcy?  
6 MR. GARMAN: Objection to form, asked and  
7 answered.  
8 Go ahead again.  
9 A. Yes, the -- I was delegated that authority by  
10 the board at the January meeting in the resolution that  
11 they passed to reorganize the organization. I consulted  
12 with the special litigation committee.  
13 The reason why the NRA didn't go further in  
14 terms of telling the whole world about it or talking  
15 about it was that the intent of New York state was very  
16 clear, to dissolve the NRA.  
17 Q. (BY MR. SHEEHAN) No, no. We're talking about  
18 specifically your discussion with the special litigation  
19 committee about authorization to file the bankruptcy,  
20 and you never got a vote of that committee, correct, to  
21 authorize the bankruptcy?  
22 MR. GARMAN: Objection to the form.  
23 Objection, misstates his testimony.  
24 A. All three of them said, yes, we are on board  
25 with doing it. And -- but they were very concerned

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1 about leaks because they felt that the number one  
 2 priority of New York state was to dissolve the NRA,  
 3 despite the fact that it's a great organization of 5  
 4 million members that does all kinds of wonderful  
 5 things --  
 6 Q. (BY MR. SHEEHAN) Can we go back,  
 7 Mr. LaPierre, to -- you said they all knew about it.  
 8 Did they all vote to authorize the bankruptcy filing?  
 9 MR. GARMAN: Counsel, you've now asked  
 10 this four times. There's also a resolution.  
 11 MR. SHEEHAN: He hasn't answered the  
 12 special litigation --  
 13 MR. GARMAN: He has every single time,  
 14 and there's a resolution attached to the petition.  
 15 MR. CORRELL: Not only has he answered  
 16 four times, you've cut him off four times. So can we  
 17 just move on?  
 18 MR. GARMAN: You don't like the answer.  
 19 Move on.  
 20 Q. (BY MR. SHEEHAN) Mr. LaPierre --  
 21 A. Yes, sir.  
 22 Q. -- did you consult with Craig Spray before you  
 23 filed for bankruptcy?  
 24 A. I did not.  
 25 Q. Why not?

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1 A. Because the special litigation committee in  
 2 particular and all of us were very concerned. We  
 3 knew -- we all knew that New York state was out to  
 4 destroy and dissolve the NRA, despite -- I mean, despite  
 5 every best effort attempt to be in full compliance and  
 6 to self-correct, it's obvious New York could care less  
 7 about any of that. They just wanted to destroy the NRA  
 8 and so General James could fulfill her campaign promise.  
 9 Q. Why didn't you talk to Mr. Spray about filing  
 10 the bankruptcy petition?  
 11 A. Because we were very concerned about leaks.  
 12 Because if this leaked, we were very -- we were fully  
 13 aware that General James could have tried -- could have  
 14 put the NRA into receivership if she -- if this had  
 15 leaked, and we -- so our concern was to save this great  
 16 organization with our 5 million members and all the  
 17 great programs and all the great constitutional advocacy  
 18 it does.  
 19 Q. This is your own chief financial officer, your  
 20 own officer of the NRA, and you -- you did not believe  
 21 he would not leak the information?  
 22 MR. GARMAN: Objection as to form.  
 23 A. This was so sensitive that -- that the  
 24 officers and I also believed that this had to be tightly  
 25 held, because if it leaked in any way -- and so much

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1 leaks out of this building that -- I mean, we all no  
 2 that General James seeks to dissolve the NRA, that she  
 3 would immediately, if she got any wind of this, would  
 4 try to put the NRA into receivership and destroy the  
 5 organization. And -- and --  
 6 Q. (BY MR. SHEEHAN) So is it fair to say that  
 7 you did not trust your chief financial officer and  
 8 treasurer not to leak this information if you gave it to  
 9 him?  
 10 MR. GARMAN: Number one, I am going to  
 11 object that you cut off the witness to a question as to  
 12 why. I am going to object to the form of the question,  
 13 asked and answered.  
 14 But go ahead and answer it again.  
 15 A. We kept this very closely held to the special  
 16 litigation committee and the EVP because of the fact  
 17 that any leak could have -- could have led to the demise  
 18 of this organization, of this wonderful organization.  
 19 Q. (BY MR. SHEEHAN) Did you value Sonya  
 20 Rowling's ideas about the financial situation of the  
 21 NRA?  
 22 MR. GARMAN: Objection to the form of the  
 23 question.  
 24 A. I valued Craig Sprays' ideas about the  
 25 financial future of the NRA. I value Sonya's ideas. I

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1 think they both did wonderful jobs.  
 2 Q. (BY MR. SHEEHAN) And were you concerned about  
 3 either of them leaking that information about the  
 4 bankruptcy filing?  
 5 MR. GARMAN: Objection to the form of the  
 6 question.  
 7 Go ahead.  
 8 A. We were -- we were concerned about anyone  
 9 leaking this information. Not specifically Craig,  
 10 Sonya. Anyone. It's just -- it's obvious that the  
 11 further you widen the circle, the more chance there is  
 12 of a leak. And in this case, a leak, given the fact it  
 13 had become crystal clear that General James -- and she  
 14 said it during her campaign, was to open her  
 15 investigation, boom, nail the NRA, weaponize New York  
 16 government. And she would have moved for receivership,  
 17 which would have been the end of this organization.  
 18 While we had the opportunity, if we could file  
 19 Chapter 11 to reorganize the NRA, ask a federal judge  
 20 under a federal judge's jurisdiction -- ask a federal  
 21 judge for permission to reincorporate in a friendly  
 22 state with a fair regulatory environment, where the  
 23 organization after -- it is totally compliant now, not  
 24 only with New York state law, but with every other  
 25 state's nonprofit law, where the organization could have

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1 a future to prosper and grow in a fair regulatory  
2 environment and not a hostile weaponized situation --  
3 Q. (BY MR. SHEEHAN) When did the NRA --  
4 MR. GARMAN: Counsel -- Counsel --  
5 MR. SHEEHAN: He's still filibustering.  
6 MR. CORRELL: Excuse me. And I'm sorry  
7 to interrupt my own co-counsel, but you've used the term  
8 "filibuster" four times and I've let you go three times.  
9 I'm not letting you go anymore. If you use it again,  
10 I'm going to walk out with my witness. Okay? And if  
11 you think that's an empty threat, then try me and we'll  
12 call the judge. You can't harass and harangue and  
13 insult a witness like that. Ask a question.  
14 MR. GARMAN: Counsel, this is Greg  
15 Garman. It's 5:30. When there's a natural breaking  
16 point in your questioning, we should call it a night.  
17 Q. (BY MR. SHEEHAN) When did the NRA begin  
18 shopping for bankruptcy counsel?  
19 A. In the -- in the weeks -- I remember we  
20 interviewed the Neligan firm down -- down in Dallas the  
21 weekend of the board meeting. I had numerous phone  
22 calls with the Garman firm, you know, in about -- about  
23 the same timeframe.  
24 Q. So that's January of 2021?  
25 A. Correct.

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1 Q. All right. How many other bankruptcy firms  
2 did the NRA speak to besides the Neligan firm and the  
3 Garman firm?  
4 A. I'm not -- I didn't speak to any others.  
5 Q. How were you introduced to Mr. Neligan?  
6 A. He was recommended to us by the Brewer firm.  
7 Q. Okay. When was Neligan engaged by the NRA?  
8 A. I can't remember the exact date of the  
9 engagement letter that I signed. It was sometime after  
10 we interviewed them.  
11 Q. Was it before the filing of the bankruptcy  
12 petition?  
13 A. Yeah, I believe it was.  
14 Q. And you said there's a written engagement  
15 letter with the Neligan firm?  
16 A. I believe there is. I know that I'm the one  
17 that gave the authority to hire them.  
18 Q. I'm sorry. You personally were the one that  
19 gave the authority to hire them?  
20 A. I did.  
21 Q. Did the special litigation committee have  
22 any -- get involved in that decision?  
23 A. Yeah. They interviewed them also, as I said,  
24 in Dallas, and they thought they were great and they  
25 were in favor of it.

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1 Q. Prior to the petition date, there was a  
2 million dollar retainer paid to the Neligan firm.  
3 Correct?  
4 MR. GARMAN: Objection to form.  
5 Go ahead.  
6 A. Prior to the bankruptcy petition date?  
7 Q. (BY MR. SHEEHAN) Yes, sir.  
8 A. I know we had set aside money into a trust  
9 fund -- trust account to be used to retain counsel  
10 because we thought there would be a lot of activity  
11 going on in all of this and a lot of lawyers and  
12 everything. So I know we put -- we put 5 million aside  
13 into a special trust account to be used for those  
14 matters.  
15 Q. And when you say a special trust account,  
16 where was that account kept?  
17 A. I think it was managed by the Brewer firm.  
18 Q. So the trust account for Neligan was managed  
19 by the Brewer -- Brewer firm?  
20 MR. GARMAN: Objection -- objection to  
21 form.  
22 A. The trust account applied the 5 million set  
23 aside for the reorganization, was put in the Brewer  
24 trust fund to be used for those type of expenditures.  
25 Q. (BY MR. SHEEHAN) And when did that happen?

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1 A. That happened several weeks before -- Craig  
2 Spray is the one that I think actually suggested it,  
3 that we put money into a special trust account to be  
4 used for those purposes.  
5 Q. I'm sorry, to be used for which purposes,  
6 Mr. LaPierre?  
7 A. Reorganization purposes. We still --  
8 reorganization purposes.  
9 Q. So am I correct in saying the Neligan firm  
10 never had a trust amount put into their firm, correct?  
11 MR. GARMAN: No. Objection to the form  
12 of the question.  
13 A. I don't -- I'm not aware -- I'm not aware  
14 whether they did or didn't.  
15 Q. (BY MR. SHEEHAN) In September of 2020,  
16 Carolyn Meadows advised the board that she had been  
17 advised by NRA counsel and board counsel it would be in  
18 the best interest of the NRA, as well as consistent with  
19 corporate governance practices, to create a special  
20 litigation committee. I am informed that Wayne and John  
21 agree with this course and wish to recuse themselves  
22 from oversight of the SLC litigation to avoid the  
23 appearance of any conflict.  
24 Do you remember that statement by Ms. Meadows?  
25 MR. GARMAN: Objection, form.

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1 A. Mr. Sheehan, could you give me the date of the  
2 letter again?  
3 Q. (BY MR. SHEEHAN) It's September of 2020. I  
4 don't have the date.  
5 A. Yeah, I -- I am well aware of the fact, as I  
6 said, that after General James' office brought suit  
7 against the NRA to dissolve the NRA and has brought suit  
8 against myself and John Frazer, that there was a need to  
9 have -- that I could no longer, nor could John, manage  
10 the Brewer litigation effort in regards to New York,  
11 and -- and there would be the need to have someone else  
12 do it, and that ended up being the three officers that  
13 referred to themselves as the special litigation  
14 committee.  
15 Q. Your contract with the NRA, the 2021 contract,  
16 is it your belief --  
17 A. Yes.  
18 Q. -- that that supercedes the 2013, the 2016 and  
19 the 2018 contracts?  
20 MR. GARMAN: Objection to form.  
21 Go ahead.  
22 A. Yes, it totally does.  
23 Q. (BY MR. SHEEHAN) All right. So the  
24 provisions of those prior contracts are null and void at  
25 that stage, that is, the 2013, 2016, 2018. Correct?  
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1 MR. GARMAN: Objection to the form of the  
2 question.  
3 A. That's correct. The only contract I have with  
4 the NRA is that I am employed up until the next board of  
5 directors -- up until the annual meeting, which is in  
6 September, where they can choose to re-elect me or not  
7 re-elect me. And then at their discretion, not mine, if  
8 they want to retain my name and likeness for another  
9 year or two, they have the option of doing that for a  
10 specified fee. But it's totally at their discretion,  
11 not mine, and that will be for fundraising purposes.  
12 MR. SHEEHAN: Why don't we take a short  
13 break at this point.  
14 MR. GARMAN: Okay. Well, it is our  
15 desire to -- you know, it's 5:40 -- call it a day here  
16 at some point soon.  
17 MR. SHEEHAN: After we go off the record,  
18 could the videographer just let us know where we are on  
19 time?  
20 THE VIDEOGRAPHER: Sure. We are going  
21 off the record. The time on the video is 5:40 p.m.  
22 (Break from 5:40 p.m. to 5:49 p.m.)  
23 THE VIDEOGRAPHER: We're back on the  
24 record. The time is 5:49 p.m.  
25 MR. SHEEHAN: Thank you very much.  
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1 Q. (BY MR. SHEEHAN) Mr. LaPierre, before we went  
2 off on the break, you were describing the \$5 million  
3 payment to the trust account of the Brewer firm  
4 suggested by Mr. Spray. Do you know why Mr. Spray was  
5 recommending a \$5 million fund for reorganization?  
6 A. We were talking about the need to set aside  
7 some money for reorganization in a special fund. And --  
8 and Craig and I talked about that. And I -- I don't  
9 know whether I brought up the special fund or he brought  
10 up the special fund. I think he may have. One of us  
11 did. And we both agreed that was the way -- the way to  
12 go.  
13 Q. And I hesitate to ask why, but can you tell me  
14 why that made sense from your perspective?  
15 A. Because there was going to be a need to -- for  
16 a lot of activity that was going to take place if we  
17 were going to do anything at all on any type of  
18 reorganization and it would make sense to have some  
19 money set aside for that purpose.  
20 Q. Did the Brewer firm ask for \$5 million to be  
21 put in trust account for these purposes?  
22 MR. CORRELL: Objection to form. This is  
23 Kent Correll.  
24 A. I -- I can't remember exactly what the  
25 discussions were with the Brewer firm on that. I mean,  
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1 I know we talked about that there was going to be a need  
2 for money set aside, and I just -- and we had  
3 discussions with the Brewer firm about that, too.  
4 Q. (BY MR. SHEEHAN) When was that?  
5 A. So --  
6 MR. GARMAN: Objection.  
7 You can answer the question, but don't go into  
8 the communications with the Brewer firm.  
9 A. I think we did that sometime in -- I think we  
10 did that sometime in -- I'm not positive. Maybe late  
11 December. December sometime. It might have been early  
12 January. I just can't remember.  
13 Q. (BY MR. SHEEHAN) Was it your impression that  
14 Craig Spray understood that reorganization included the  
15 potential for bankruptcy when you were having these  
16 conversations before the filing?  
17 MR. GARMAN: Objection to the form of the  
18 question.  
19 A. I think that Craig understood that a lot of  
20 options were being looked at, and I think he understood  
21 that a lot of reorganization options were being looked  
22 at. I mean, he was also well aware of -- I think, of  
23 the fact that we were looking at other states, that  
24 other states were in contact with us, that President  
25 Trump was even tweeting get out of New York, you know.  
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1 I mean, as were all kinds of other governors and  
2 attorney generals. So I think that, you know, Craig was  
3 well aware of -- that we were looking at some type of  
4 reorganization.  
5 Q. (BY MR. SHEEHAN) But was it your  
6 understanding that he understood, as part of the pallet  
7 of options, bankruptcy was one of them?  
8 A. I don't know.  
9 MR. GARMAN: Objection to form.  
10 Go ahead.  
11 A. You'll have to ask Craig whether he understood  
12 whether that was one of them or not. I did not get into  
13 a discussion with him about -- about bankruptcy.  
14 Q. (BY MR. SHEEHAN) Okay. Did you get in  
15 discussion with Sonya Rowling or with Mr. Warren about  
16 the options?  
17 A. No, I did not.  
18 Q. Did you ask Craig Spray to sign the financial  
19 statements for the NRA when it filed for bankruptcy?  
20 MR. GARMAN: Objection to form.  
21 Go ahead.  
22 A. No, I don't think I did.  
23 Q. (BY MR. SHEEHAN) Was Mr. Warren your first  
24 choice to sign off on the bankruptcy petition and the  
25 schedules?  
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1 MR. GARMAN: Objection to the form of the  
2 question.  
3 A. I -- I think Craig by that point was -- was  
4 not with the NRA any longer or -- so I think that, you  
5 know, Mr. Warren was -- someone else needed to do it,  
6 and I guess Mr. Warren did it.  
7 Q. (BY MR. SHEEHAN) Did you ask Mr. Warren to do  
8 it?  
9 A. I don't remember, to tell you the honest  
10 truth.  
11 Q. Did you ask Ms. Rowling to do it?  
12 A. I don't remember.  
13 Q. What did Mr. -- what did Mr. Spray say to you  
14 after he found out that the NRA had filed for  
15 bankruptcy, if anything?  
16 MR. GARMAN: Objection, form.  
17 Go ahead.  
18 A. I -- I don't think I've talked with Craig  
19 since that point. It's been -- it's been so busy.  
20 Q. (BY MR. SHEEHAN) After you filed, did you  
21 tell him we filed for bankruptcy?  
22 A. I don't think Craig -- and maybe I'm just  
23 getting old. Maybe my memory is getting old. I -- I  
24 don't know that -- I can't remember when Craig -- Craig  
25 departed. I just don't remember when he departed. I  
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1 did not tell him before that we were filing for  
2 bankruptcy, I know that.  
3 Q. Did you tell him after --  
4 A. I talked with Carolyn Meadows, Willes Lee and  
5 Charles Cotton about it.  
6 Q. Right. But after -- after you filed, right --  
7 he's the chief financial officer. He's the treasurer.  
8 He has the responsibility for the finances of the  
9 organization. How did he find out about the bankruptcy?  
10 MR. GARMAN: Objection to the form of the  
11 question.  
12 A. He would have found out at the same time  
13 everyone else found out. NRA did an announcement. We  
14 did a -- we did a call with members of our board of  
15 directors. We -- we -- and it also hit the media. And  
16 we -- so there were numerous communications going out  
17 from the organization immediately after we filed as to  
18 what was happening.  
19 Q. (BY MR. SHEEHAN) Did anyone have a discussion  
20 with Craig Spray about what the filing meant for his  
21 responsibilities as the treasurer or CFO?  
22 MR. CORRELL: Objection to the form of  
23 the question. This is Mr. Correll.  
24 A. I did not have that conversation with Craig.  
25 Q. (BY MR. SHEEHAN) Do you know if anyone else  
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1 at the NRA did?  
2 A. I -- I don't.  
3 Q. How about with Mr. Frazer? Once the -- once  
4 the bankruptcy was filed, was there any discussion  
5 between you and him about how his responsibilities would  
6 change in the bankruptcy?  
7 MR. GARMAN: Objection to the form of the  
8 question.  
9 A. I -- I mean, John and I talked about it.  
10 We -- I don't know that we -- I mean, we all started  
11 working together at that point going forward.  
12 Q. (BY MR. SHEEHAN) Was Mr. Spray part of that  
13 group that all worked together going forward?  
14 A. If -- the reason I'm wrestling with this is I  
15 can't remember when Craig left. That's why I'm  
16 wrestling with this and when Ms. Rowley became chief  
17 financial officer. I mean, it -- I just -- you'd have  
18 to ask Craig.  
19 Q. Did anyone ever introduce Marshall Smith to  
20 Craig Spray as the chief restructuring officer?  
21 MR. GARMAN: Objection to the form of the  
22 question.  
23 A. I know that Marshall Smith was here the day  
24 of -- the day we filed. If Craig was around, he may  
25 very well have met him. I think a lot of people met him  
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1 that day. And then he went home, and then he took  
2 himself out of it. And I think someone -- he had an  
3 illness in the family or he was ill or something. I  
4 just remember him saying to me, I've got a medical issue  
5 I've got to deal with, and he left at about 4 o'clock  
6 that day.  
7 Q. (BY MR. SHEEHAN) Okay. Do you want to -- I  
8 have a memo from January 29, 2021 from you to the staff  
9 and board advising that Craig Spray was no longer CFO  
10 and treasurer. Do you recall that memo?  
11 A. Yes -- yes, I think I do.  
12 Q. Okay. You said in that memo, Yesterday I  
13 spoke with Craig and he expressed a desire to be  
14 relieved of his responsibilities at the association due  
15 to health concerns.  
16 Do you remember -- do you recall that  
17 statement?  
18 A. I do. I talked to Craig on the phone.  
19 Q. Was that an accurate --  
20 A. Craig --  
21 Q. -- rendition -- I'm sorry, go ahead.  
22 A. Sorry.  
23 Yeah, Craig had -- Craig had pretty much --  
24 well, not pretty much -- had packed up and moved back to  
25 Michigan, or I think it's Michigan where his home is.  
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1 He had a very serious heart attack. I think his heart  
2 is functioning at about 40 percent. He was told if he  
3 gets COVID, he's probably not going to make it.  
4 And even -- even before we first hired him, he  
5 made it clear that it might not -- probably wouldn't be  
6 a long time deal.  
7 And I called him. I said something along the  
8 lines of, Look, you know, we need to move in a different  
9 direction in terms of a full-time -- we need a full-time  
10 CFO that's actually, you know, here.  
11 And because Craig -- and Craig immediately  
12 said, Look, for health reasons, Wayne, I just need to --  
13 I just need to resign anyway.  
14 And -- and I was actually going to offer him  
15 some type of continued ongoing relationship with the  
16 organization, but he was just like, health reasons,  
17 Wayne, I just -- I just appreciate everything, you know,  
18 and I'm just -- it's just -- and that's the way it went.  
19 Q. Was that -- was that conversation you just  
20 recounted, was that all on January 28, 2021?  
21 MR. GARMAN: Objection to the form of the  
22 question.  
23 A. I don't remember what date. It was before  
24 that memo went out, because it was -- I can't remember  
25 the exact date.  
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1 Q. (BY MR. SHEEHAN) You say that you told Craig  
2 that you were planning to go in a different direction  
3 which did not include him.  
4 A. We needed a full-time CFO who was actually in  
5 the office. I mean, Craig, although he did -- I think  
6 he did a great job as treasurer, I mean, and helping us.  
7 You know, and I enjoyed working with him. He really  
8 wasn't around for the last year. I mean -- and he  
9 had -- given everything the organization was facing, we  
10 needed a -- really needed a full-time CFO, and that's  
11 how the conversation ended up taking place.  
12 MR. SHEEHAN: Okay. At this stage, why  
13 don't we call it a day and plan to come back tomorrow at  
14 9:00 a m.  
15 And if I could ask the videographer to just  
16 tell us what our time use is.  
17 THE VIDEOGRAPHER: Yes. The time on the  
18 video is 5:52 p m.  
19 MR. SHEEHAN: Thank you very much.  
20 MR. GARMAN: I think he's asking how much  
21 time has been used.  
22 THE VIDEOGRAPHER: I'm sorry. The time  
23 that we've used is 5:52.  
24 MR. GARMAN: Okay, 5:52.  
25 THE VIDEOGRAPHER: And we're going off  
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1 record. The time on the video is 6:04 p.m.  
2 (Proceedings ended at 6:04 p.m.)  
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1 CHANGES AND SIGNATURE  
 2 WITNESS NAME: WAYNE LAPIERRE  
 3 DATE OF DEPOSITION: MARCH 22, 2021  
 4 PAGE LINE CHANGE REASON  
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 25 Job No TX4508123

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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 was reported  
 6 stenographically by me remotely via Zoom, said witness  
 7 having been placed under oath by me, and the deposition  
 8 is a true record of the testimony given by the witness;  
 9 That the amount of time used by attorneys at  
 10 the deposition is as follows:  
 11 Mr. Sheehan - 5 hours, 52 minutes  
 12 I further certify that I am neither counsel  
 13 for, nor related to any party in the cause and am not  
 14 financially interested in its outcome.  
 15 In witness whereof, I have subscribed my name  
 16 this 23rd day of March, 2021.  
 17  
 18  
 19 *Julie C. Brandt*  
 Julie C. Brandt, CSR, RMR, CRR  
 20 TX CSR No. 4018, Exp. 10/31/21  
 21 Veritext Legal Solutions  
 Firm Registration No. 571  
 22 300 Throckmorton Street, Suite 1600  
 Fort Worth, Texas 76102  
 23 817-336-3042  
 24  
 25

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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 ggarman@gtg.legal  
 2 March 23, 2021  
 3 National Rifle Association Of America And Sea Girt LLC  
 4 DEPOSITION OF: Wayne LaPierre , Vol. 1 (# 4508123)  
 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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