

EXHIBIT 18

In The Matter Of:

*NRA v.
Ackerman McQueen*

Mildred Hallow

January 10, 2020

CONFIDENTIAL



Min-U-Script® with Word Index

Page 1

1 IN THE CIRCUIT COURT
2 FOR THE CITY OF ALEXANDRIA
3 -----)
4 NATIONAL RIFLE ASSOCIATION OF)
5 AMERICA,)
6 Plaintiff,) Case No.
7 vs.) CL19001757 and
8 ACKERMAN McQUEEN, INC., and) CL19002067
9 MERCURY GROUP, INC.,)
10 Defendants.)
11 -----)
12
13
14 DEPOSITION OF MILDRED HALLOW
15 Washington, D.C.
16 January 10, 2020
17
18
19
20
21
22
23
24
25 REPORTED BY: Tina Alfaro, RPR, CRR, RMR

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1 Videotaped deposition of MILDRED HALLOW,
2 held at the offices of:
3
4 Latham & Watkins
5 555 11th Street, NW
6 Washington, D.C. 20004
7
8 Taken pursuant to notice before Tina M.
9 Alfaro, a Notary Public within and for the District
10 of Columbia.
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1 APPEARANCES:
2 ON BEHALF OF THE NRA:
3 BREWER ATTORNEYS & COUNSELORS
4 BY: MICHAEL COLLINS, ESQ.
5 1717 Main Street, Suite 5900
6 Dallas, Texas 75201
7 (214) 653-4875
8 and
9 BRIGLIA HUNDLEY
10 BY: ROBERT COX, ESQ.
11 1921 Gallows, Suite 750
12 Vienna, Virginia 22812
13 (703) 883-0880
14 ON BEHALF OF ACKERMAN McQUEEN:
15 SCHERTLER & ONORATO, LLP
16 BY: JOSEPH GONZALEZ, ESQ.
17 901 New York Avenue, NW, Suite 500
18 Washington, D.C. 20001
19 (202) 628-4199
20 ON BEHALF OF THE MERCURY GROUP:
21 SCHERTLER & ONORATO, LLP
22 BY: DAVID DICKIESON, ESQ.
23 901 New York Avenue, NW, Suite 500
24 Washington, D.C. 20001
25 (202) 628-4199

Page 4

1 APPEARANCES: (Cont'd)
2 ON BEHALF OF THE WITNESS:
3 LATHAM & WATKINS
4 BY: KEVIN CHAMBERS, ESQ.
5 ALICE FISHER, ESQ.
6 CHRISTOPHER D'AGOSTINO, ESQ.
7 555 11th Street, NW
8 Washington, D.C. 20004
9 (202) 637-2200.
10
11 ALSO PRESENT: Charlie Widner (videographer)
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1 THE VIDEOGRAPHER: We are now on the
 2 record. My name is Charlie Widner. I'm a
 3 videographer retained by Lexitas. This is the
 4 video deposition filed in the Circuit Court for the
 5 City of Alexandria, Case No. CL-19001757. Today's
 6 date is January 10th, 2020, and the video time is
 7 10:12 a.m.
 8 This deposition is being held at Latham &
 9 Watkins, Washington, D.C. in the matter of National
 10 Rifle Association of America versus Ackerman
 11 McQueen, Inc., et al. The deponent is Millie
 12 Hallow.
 13 At this time will counsel please identify
 14 themselves for the record.
 15 MR. DICKIESON: Good morning. This is
 16 David Dickieson on behalf of The Mercury Group.
 17 MR. GONZALEZ: Joseph Gonzalez on behalf
 18 of Ackerman McQueen.
 19 MR. COLLINS: Michael Collins on behalf of
 20 the Plaintiffs, National Rifle Association of
 21 America.
 22 MR. COX: Bob Cox on behalf of the NRA.
 23 MR. CHAMBERS: Kevin Chambers on behalf --
 24 Kevin Chambers from Latham & Watkins on behalf of
 25 the witness, Millie Hallow.

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1 MR. D'AGOSTINO: Chris D'Agostino of
 2 Latham & Watkins on behalf of the witness, Millie
 3 Hallow.
 4 MS. FISHER: Alice Fisher on behalf of
 5 Latham & Watkins, Ms. Hallow's counsel.
 6 THE VIDEOGRAPHER: At this time the court
 7 reporter, Tina Alfaro, can swear in the witness.
 8 (Witness sworn.)
 9 MR. COLLINS: David, one quick question.
 10 Is this being taken just in the Virginia actions
 11 or --
 12 MR. DICKIESON: That's my understanding.
 13 MR. COLLINS: Not Texas?
 14 MR. DICKIESON: Right.
 15 MR. COLLINS: Okay.
 16 WHEREUPON:
 17 MILDRED HALLOW,
 18 called as a witness herein, having been first duly
 19 sworn, was examined and testified as follows:
 20 EXAMINATION
 21 BY MR. DICKIESON:
 22 Q. Good morning, Ms. Hallow. Is that how
 23 it's pronounced, Hallow?
 24 A. Yes.
 25 Q. All right.

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1 A. Yes, sir. I don't remember -- good
2 morning -- your name.
3 Q. My name is David Dickieson, and, as -- as
4 you already know, I'm representing the Mercury
5 Group today.
6 Have you ever had your deposition taken
7 before?
8 A. No, I have not.
9 Q. All right. So what we're doing today is
10 we're getting testimony from you. It's under oath,
11 so it's just as if you were in court, and your
12 obligation to tell the truth is just the same as it
13 is if you were in court. Do you understand that?
14 A. I do understand that.
15 Q. And so when we're taking your testimony,
16 although it's being videotaped, it's also we have a
17 court reporter and the transcript is used quite a
18 bit. So we need to have your answer in a yes or
19 no. We can't have a shaking of the head. That may
20 be understandable on the video, but not to a
21 transcript. Do you understand that?
22 A. I -- I do understand that.
23 Q. Okay. And the -- the other thing that the
24 court reporter will thank me for is when I'm asking
25 a question, wait until I end my question, you hear

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1 the question mark at the end of the question, and
2 then answer. Don't anticipate the end of the
3 question and jump in because that makes it hard for
4 her to take down the testimony. Do you understand
5 that?
6 A. I do understand.
7 Q. All right.
8 Could you state your full name for the
9 record.
10 A. Mildred Hallow.
11 Q. Okay. And you go by Millie; is that
12 right?
13 A. That is correct.
14 Q. And what is your maiden name?
15 A. My maiden name is Bautista.
16 Q. Okay. What is -- start at the beginning.
17 What is your educational background?
18 A. I went to -- graduated from high school
19 and I went for two years to the University of
20 California at Davis, dropped out, and in subsequent
21 years did summer courses at -- at UCLA when my then
22 husband was an attorney.
23 Q. Okay. And what was the name of your
24 husband at that time?
25 A. Chuck Galvin.

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1 THE REPORTER: Spell the last name.
2 THE WITNESS: G-A-L-V-I-N.
3 BY MR. DICKIESON:
4 Q. And did you take his name at the time?
5 A. I don't remember.
6 Q. How long were you married to Mr. Galvin?
7 A. Six years.
8 Q. Okay. What year did you marry Mr. Galvin?
9 These questions will get easier getting closer in
10 time.
11 A. Probably around 1967 or '66.
12 Q. Okay.
13 And then just to be clear, I was having a
14 hard time reading the handwriting, but your date of
15 birth is October 29, 1946; is that right?
16 A. That is correct.
17 Q. What is your Social Security number?
18 [REDACTED].
19 Q. Okay. So when you were taking classes
20 at -- you said UCLA, were you working at the time?
21 A. I was.
22 MR. CHAMBERS: Just to clarify, what's the
23 name of the school that you went to, Millie?
24 THE WITNESS: UCLA.
25 MR. CHAMBERS: UCLA?

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1 THE WITNESS: UCLA in the summers.
2 MR. CHAMBERS: Okay.
3 THE WITNESS: University of California at
4 Davis for two years during the regular year.
5 BY MR. DICKIESON:
6 Q. Right. Okay. Those were not at the same
7 time -- those summers were not at the same time,
8 that was later; is that my understanding from your
9 prior testimony?
10 A. I would have to think about this. I got
11 married in the middle of I think my sophomore year,
12 and I then worked, I wasn't in school. My husband
13 was in veterinary school and he would do
14 internships in Los Angeles and I could take summer
15 classes, but I also worked.
16 Q. All right. Let me make this a little
17 easier. Let me show you what we'll have marked as
18 Deposition Exhibit 1 or Hallow Exhibit 1, a bio
19 that's from the Women Legislators board of
20 directors.
21 MR. DICKIESON: I don't think I have
22 enough for everybody.
23 (Hallow Exhibit 1 was marked
24 for identification.)
25 BY MR. DICKIESON:

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1 Q. Is that your bio in Deposition Exhibit
2 No. 1?
3 A. Can I read it first?
4 Q. Sure.
5 (Witness reviewing document.)
6 A. It's -- I didn't write this, but it's
7 basically generally correct.
8 Q. Who wrote it?
9 A. I'm -- I'm not sure.
10 Q. Okay.
11 A. I haven't seen this before.
12 Q. Okay. Are you on the board of directors
13 of the Women Legislators organization?
14 A. I am on the board of the National
15 Foundation of Women Legislators.
16 Q. Okay. And at the top of the first page it
17 says "Millie Hallow, National Foundation for Women
18 Legislators." Is that -- so this was taken from
19 that Website?
20 A. Okay. All right.
21 Q. And -- and you say you did not have any
22 input into the bio they posted for you?
23 A. I've been on that board for a long time
24 and this is an old picture. I -- I may have or
25 someone in the office might have compiled this. I

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1 don't remember it.
2 Q. Okay.
3 A. Let me say that, I don't remember reading
4 it or being asked to write it.
5 Q. Okay. When you say someone in the office,
6 are you talking about the NRA office or are you
7 talking about the National Foundation for Women
8 Legislators?
9 A. That's -- I guess it could have been
10 either. I'm not sure.
11 Q. Okay.
12 This -- as I say, the reason for showing
13 this to you is to short-circuit some of the
14 biographical questions I was going to be asking
15 you. So let me go through some of the statements
16 here.
17 On the second page, the second-to-the-last
18 paragraph it says "She has also spent eight years
19 as an elementary music teacher and directed an
20 award-winning children's chorus."
21 Is that a true statement?
22 A. That is a true statement.
23 Q. And where were you an elementary music
24 teacher?
25 A. St. Pius Elementary School in Bowie,

Page 15

1 Maryland, Prince George's County. It's a Catholic
2 school.
3 Q. Okay. It says "She also served as music
4 director for a number of regionally-based musical
5 productions, including the East Coast premier of
6 Metropolis."
7 Is that a true statement?
8 A. Yes. They were -- what this neglected to
9 say is that they were student productions.
10 Q. Ah, okay. Were these high school
11 students?
12 A. High school and elementary.
13 Q. Okay. In that last paragraph it says
14 "Born in the Philippines, Miss Hallow came to the
15 United States as a baby. She was raised in
16 Northern California where her parents were fruit --
17 tenant fruit ranchers."
18 Is that a true statement?
19 A. That is correct.
20 Q. Okay. "Speaking no English until she
21 began public schools, she soon excelled
22 scholastically and graduated valedictorian of her
23 high school senior classes and was recipient of
24 numerous scholarships at the University of
25 California Davis where she majored in political

Page 16

1 science and music."
2 Is that a true statement?
3 A. The scholarships were not from the
4 University of California at Davis. They were local
5 or state or otherwise defined which you could
6 dedicate to whatever college you were attending.
7 Q. Okay.
8 And I think you testified that you didn't
9 graduate from University of California at Davis; is
10 that right?
11 A. I -- I did not.
12 Q. Okay. And so you completed two years
13 there?
14 A. Yes.
15 Q. Okay. Did you have to declare a major in
16 those first two years?
17 A. You could if you wanted to.
18 Q. Earlier in the bio it says "From 1977 to
19 1987"; do you see that --
20 A. I see it.
21 Q. -- paragraph?
22 "She was extensively involved in public
23 arts administration. She served as deputy director
24 and senior consultant for the Cultural Alliance of
25 Greater Washington."

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1 Is that a true statement?
2 A. I'm not sure about those dates, but I was
3 deputy director and senior consultant for the
4 Cultural Alliance of Greater Washington. And might
5 I add as we're delving into this, it's -- it's not
6 something -- this whole -- the tone is not
7 something I would write about myself. So...
8 Q. You're saying the tone is too -- too what?
9 A. Not -- too -- it's not particularly
10 humble.
11 Q. Okay. You're excused from not being
12 humble in your bio. That's all right.
13 A. But I would not -- I've written bios for
14 myself in the past that do not have this tone. I
15 just want to make that clear.
16 Q. Okay. So what we're trying to do is make
17 sure the facts are correct --
18 A. Okay.
19 Q. -- regardless of the tone.
20 A. Okay.
21 Q. So the next sentence, "She was appointed
22 executive director of the D.C. Commission on the
23 Arts and Humanities and the mayor's advisor for
24 cultural affairs and, as such, was the key arts
25 representative for the District of Columbia with a

Page 18

1 staff of 20 and a grant budget of \$10 million."
2 Is that a true statement?
3 A. I'm not sure about the accuracy of the
4 staff about that and I no longer remember the
5 budget.
6 Q. Okay. But the rest is true?
7 A. Yes, I was -- I did hold that position.
8 Q. "In California she simultaneously served
9 as the Art in Public Places coordinator and the
10 director of development and multicultural
11 activities for the Sacramento Metropolitan Arts
12 Commission."
13 Is that a true statement?
14 A. That is a true statement.
15 Q. And I take it you weren't simultaneously
16 serving in the California role as in the D.C. role;
17 is that right?
18 A. The Cali- -- the Sacramento Arts
19 Commission was subsequent. There are no dates. It
20 was after I -- after the D.C. Arts Commission.
21 Q. Okay. And so what years were you in
22 Sacramento?
23 A. '84 to '87 possibly. That's in the right
24 ballpark I think.
25 Q. And what years were you teaching in Bowie,

Page 19

1 in PG County?
2 A. That would -- '88 to '94, in that -- in
3 that -- in that general range.
4 Q. Okay. And when were you employed -- or
5 when did you serve as the deputy director and
6 senior consultant for the Cultural Alliance of
7 Greater Washington?
8 A. Before -- it was before Marion Barry was
9 mayor, and I just -- I -- I don't know the dates.
10 Q. Was that before you moved to Sacramento?
11 A. Way before.
12 Q. Way before?
13 A. Way before. So it would be Cultural
14 Alliance, then D.C. Arts Commission, then
15 Sacramento.
16 Q. And then Bowie, teaching in Bowie?
17 A. And then Bowie, correct.
18 Q. And after your teaching role is that when
19 you went to work for the NRA?
20 A. I was a consultant for a year doing a book
21 tour.
22 Q. Whose book tour?
23 A. A book tour for Wayne LaPierre's first
24 book.
25 Q. Okay. So you did that before you were an

Page 20

1 NRA employee?
2 A. I did it for a summer. That is, in fact,
3 how I met people at the NRA.
4 Q. And what summer was that?
5 A. The summer of 1994, I believe. I'm not
6 real strong on -- on the time frames and I
7 haven't -- I could get -- I could look things up
8 and be more specific, but I know generally I'm in
9 the ballpark.
10 Q. How were you hired to work on the book
11 tour?
12 A. I -- I don't recall. I think -- I did not
13 know Mr. LaPierre, but I did know the major person
14 that was their direct mail person that was a
15 consultant and I knew him through conservative
16 kinds of things. And I was looking to do something
17 during the summer to supplement my elementary
18 school income, and he said that because he was
19 involved why -- would you be willing to work for
20 the National Rifle Association, I think they need
21 somebody to put together a book tour, and that's --
22 I never talked to Mr. LaPierre. The person said
23 you're in and, you know, when's your last day of
24 school and when can you start.
25 Q. And who was that person who was the

Page 21

1 direct --
2 A. Brad -- Brad O'Leary.
3 Q. Do you know where he is now?
4 A. He is in Dallas, but very ill.
5 Q. During the book tour did you then work
6 directly with Wayne LaPierre?
7 A. In -- in a sense. I worked with Regnery
8 Associates -- Regnery -- I know it's not Regnery
9 Associates. It's the Regnery Publishing Company I
10 think it's called who published the book and it
11 turns out I think they were either Ackerman McQueen
12 or Mercury Group employees, and I worked with the
13 publishing company and their PR person to get
14 Wayne -- Wayne LaPierre book signing opportunities.
15 We did eventually 82 cities in a
16 three-month period, so it was quite -- quite
17 intense, and my biggest interaction with
18 Mr. LaPierre is when he called me on the road and
19 he said 500 people showed up and we only had 300
20 books.
21 Q. That's your -- your most direct contact
22 with Wayne LaPierre during the tour?
23 A. I met him in the office, but we didn't
24 have much interaction.
25 Q. Okay. Was that a -- was that a critical

Page 22

1 remark or was that a remark in praise that you had
2 so many people there?
3 A. Probably a little of both. Looking back
4 at -- at the moment in realtime, it probably
5 terrified me.
6 Q. Okay. You say there were some AMC or
7 Mercury Group employees. Do you know who you
8 worked with at that time --
9 A. I --
10 MR. CHAMBERS: One second. Millie, I want
11 you to make sure you let Mr. Dickieson finish the
12 question --
13 THE WITNESS: Okay.
14 MR. CHAMBERS: -- before you put your
15 answer in. All right?
16 THE WITNESS: Sorry.
17 MR. CHAMBERS: Okay.
18 A. Could -- could you repeat the question?
19 Q. Sure.
20 You mentioned that you worked with AMC or
21 Mercury Group employees on that book tour. Do you
22 remember who those people were?
23 A. The people that were on the road with him
24 were Ginny Simone and Tyler Schropp, and I believe
25 they were Mercury Group employees, but I'm not

Page 23

1 sure.
2 Q. How did you become an employee of the NRA?
3 A. At the end of the summer the CEO, Wayne
4 LaPierre, asked me to come work for him, and I said
5 that I could not because I had signed a teaching
6 contract. And at the end of the year -- then he
7 said, well, at the end of the year please consider
8 coming back to work for us, and I did and that's
9 what I did.
10 Q. Did -- did you have a teaching
11 certificate?
12 A. For -- I had some kind of provincial --
13 provisional thing that cath- -- less stringent than
14 public schools for Catholic schools. It was I had
15 to go to take classes at Towson State University
16 and -- and some sacred music seminars in Pittsburgh
17 and at Towson in order to -- to be the teacher.
18 It -- further? That's okay?
19 Q. So you did have a teaching certificate?
20 A. I had -- I had some kind -- I had no
21 teacher's training. The -- here -- the situation
22 was this. I -- at this Catholic school, which my
23 son attended, I volunteered as the piano assistant
24 for the music teacher, just volunteering. The
25 music teacher had a nervous breakdown. They

Page 24

1 advertised for the job and no one applied for half
2 a year, and I began doing it informally. The
3 principal said we think you're terrific, here are
4 the curriculum guides, can you handle it and
5 we'd -- we'd be willing to send you to whatever
6 classes, and I went to wherever I was directed.
7 Q. Within that one school?
8 A. Just that -- that's all I've ever done.
9 Q. St. Pius?
10 A. St. Pius the 10th.
11 Q. Okay. And what grades did you teach
12 there?
13 A. 1 through 8.
14 Q. And it was just music?
15 A. Just music.
16 Q. Okay.
17 You mentioned your son. What is his name?
18 A. Ian Walters.
19 Q. And do you have any other children?
20 A. I do not.
21 Q. Were you married to someone named Walters
22 at some time?
23 A. I was.
24 Q. Okay. When -- when was that marriage?
25 A. 1977, possibly, to 1982, but I don't know

Page 25

1 when the actual divorce occurred. '82, '83. I
2 just -- I don't remember.
3 Q. And what was his full name?
4 A. Collin, Collin Walters.
5 Q. And when did you marry Mr. Hallow?
6 A. We married In 1987.
7 Q. And you're still married today; is that
8 right?
9 A. We are.
10 Q. And his name is Ralph; is that right?
11 A. That is correct.
12 Q. What does he do for a living?
13 A. He's the chief political columnist for the
14 Washington Times.
15 Q. And how long has he held that position?
16 A. He has been with the Washington Times
17 since its inception in 1982, but he's had
18 various -- had various roles.
19 Q. Do you have any stepchildren? Let me --
20 I'll rephrase that. Does Ralph Hallow have any
21 children before he married you?
22 A. Yes, but he's not in touch with her and
23 the family remarried. I don't know much about it.
24 Q. Okay.
25 A. None that it's -- no. I would have said

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1 no.
2 Q. All right. What about any stepchildren
3 through Mr. Walters?
4 A. There were two.
5 Q. Do you have any contact with any of those
6 stepchildren?
7 A. Nickola Walters is -- lives in this area,
8 and she is a psychiatrist.
9 Q. And the second one?
10 A. Robert. I am not in touch with him.
11 Q. Okay. And your first marriage, are you in
12 touch with anyone related to your husband?
13 A. Galvin. No. He might be deceased, as is
14 Collin Walters.
15 Q. Okay.
16 Now, your son has -- has worked for the
17 NRA; is that correct?
18 A. My son has done some -- he's not an
19 employee. He's done limited work for the
20 Association.
21 Q. Over what years has he done that work?
22 A. I'm not sure because I have not been
23 involved. I believe it is now three or four years
24 that he has done the -- the performer stage work at
25 the annual meeting in the exhibit hall. It's

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1 called I think sound stage, the sound stage in the
2 exhibit hall.
3 Q. So he's doing this as an independent
4 contractor with the NRA?
5 A. I -- I guess you would call it that.
6 Q. Okay. Is he -- does he have expertise in
7 the technical aspects of sound stage?
8 A. He is a -- a professional musician. So
9 yes.
10 Q. And what does he do when he's not working
11 for or with the NRA?
12 A. He is the director of communications for
13 the American Conservative Union.
14 Q. How long has he had that position?
15 A. On and off for a long time. Since maybe
16 15 or 20 years. I'm just not sure.
17 Q. Okay. How old is he now?
18 A. He's in his 40s.
19 Q. The -- let's go back to Exhibit 1 and talk
20 about your responsibilities at the NRA.
21 A. This?
22 Q. Yes.
23 When you were first hired who -- was
24 anyone else involved in hiring you other than
25 Mr. LaPierre?

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1 A. Not to my knowledge.
2 Q. Did you go to work directly for
3 Mr. LaPierre at that time?
4 A. When I became an employee I had an office
5 that was within the EVP suite. So yes, I reported
6 directly to him.
7 Q. And by "EVP" you mean the executive vice
8 president; is that right?
9 A. And CEO, yes.
10 Q. Okay.
11 What was your title when you first
12 started?
13 A. Special assistant.
14 Q. Special assistant to whom?
15 A. The EVP.
16 Q. Okay. And what were your job
17 responsibilities at that time?
18 A. It evolved.
19 Q. Just start with how did they start?
20 A. Mr. LaPierre gave me correspondence to
21 write and respond to that sometimes I would have to
22 go to different divisions to research. I think it
23 was a way to get me to understand what the
24 Association was. I had no background in it.
25 There would be various projects, none of

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1 which I can remember. There were -- there was not
2 a sense of ongoing stuff at the beginning. I
3 remember categorizing -- there had been some crisis
4 and a bunch of letters had been sent in by members
5 and they were just -- there was no sense of how to
6 respond to them. I categorized them and did form
7 letters like by categories.
8 But -- and from -- I think pretty
9 quickly -- and I don't know if there's -- pretty
10 quickly this radio show with Westwood One was --
11 started to happen and it was a monthly show, two
12 hours live Sunday at the Westwood One studio,
13 non -- nongun, it was general purpose, and once
14 that started that became a major responsibility
15 because it was my job to find the guests, to do the
16 pre-interviews.
17 We did a lot of books. I would read the
18 books and devise the questions and -- you know, and
19 it all had to be booked by the end of the week. We
20 would talk generally let's have a political
21 candidate, let's see -- let's -- let's -- you know,
22 such and such has written a book, would they come
23 in the studio, do we have to do it by phone.
24 And then on Sunday afternoon I would meet
25 with Mr. LaPierre and Ginny Simone, who at that

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1 time I think was -- and I just don't know whether
2 it was Mercury or Ackerman McQueen, and she knew
3 about radio itself and how it functioned, and the
4 three of us would sketch out how the show would
5 play. So it was pretty time-consuming.
6 Q. And Wayne LaPierre was the host of this
7 show?
8 A. He was the host of the show.
9 Q. What was the name of the show?
10 A. The Wayne LaPierre Show.
11 Q. And that was -- you worked in -- in tandem
12 with the people at AMC or Mercury Group; is that
13 what you're saying?
14 A. Yes, and with -- and then the production
15 company, which was -- I don't know how it all
16 worked, but it was produced -- the affiliate -- I'm
17 not using the right -- it was Westwood One and they
18 were the ones that would farm it out so that it was
19 syndicated.
20 Q. Was this an AM show or an FM show?
21 A. I don't remember.
22 Q. Okay.
23 A. I don't remember.
24 Q. Did -- were there analytics that showed --
25 that told the NRA how many people were listening to

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1 the show that you received?
2 MR. CHAMBERS: Objection, foundation;
3 objection, form. You can answer.
4 A. I -- I imagine so. That was not my -- I
5 had to do -- I didn't know about any of the other
6 stuff.
7 Q. Okay.
8 A. I -- I know very little about how -- how
9 it came about or whatever. It was...
10 Q. And did I understand correctly that it was
11 essentially a three-person effort, you, Wayne
12 LaPierre and Ginny Simone, that --
13 A. Totally.
14 Q. Totally. Okay. And it was a two-hour
15 show once a week?
16 A. Yes.
17 Q. So did that consume your entire weekly
18 schedule to prepare for that?
19 A. I would not say entirely the weekly
20 schedule, but it was -- depending on how hard it
21 was to get a guest and whether there -- and what
22 the research had to be, sometimes it was easy.
23 Sometimes it would be on really esoteric subjects,
24 and -- and sometimes you'd think you were done and
25 people canceled out on you and you were scrambling

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1 on Thursday and Friday.
2 Q. And you said this was not a gun rights or
3 Second Amendment-focused show; is that right?
4 A. That is correct. It was -- I think its
5 intent -- you know, I don't want to speculate
6 because I don't know.
7 Q. Well, I'll ask the question directly.
8 What do you think the purpose of the show was?
9 A. I will -- I'm not sure what the purpose,
10 but it -- it sure made Mr. LaPierre more
11 comfortable around microphones and to speak
12 spontaneously. Over the period of six or seven
13 years he needed less and less help when he had
14 to -- when a guest didn't show up or answering
15 questions that were call-ins and you had to hold
16 fewer and fewer signs up.
17 I personally think that that helped
18 develop him for the people that were guests on the
19 show. We would sometimes invite people that were
20 adverse to the Second Amendment and/or politicians
21 who were not enlightened, and I think that from a
22 PR point of view it was useful for them to see
23 Wayne LaPierre in a setting that they had imagined
24 him wearing camo or whatever.
25 That was broadening. That is my

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1 observation. I'm really not sure what the initial
2 intent was, but I think that's the outcome and I've
3 said that to others.
4 Q. Okay.
5 Was the National Rifle Association a
6 sponsor of the show?
7 A. Initiator or sponsor. I don't know how
8 any of that worked.
9 Q. Did the National Rifle Association have
10 advertisements during the show?
11 MR. CHAMBERS: Objection, foundation.
12 A. I don't remember. That would make sense,
13 but I -- because during the breaks I would be busy
14 getting the next segment up, and I really was only
15 involved in the -- I was not involved at all in the
16 marketing of the show, only in the -- the content,
17 substantive content of the guests.
18 Q. Do you know if the National Rifle
19 Association was paying for access to two hours on
20 the radio or, in the reverse, was Westwood One
21 paying Mr. LaPierre and the NRA for him to be on
22 the show?
23 A. I don't know.
24 Q. Were you drawing any pay from
25 Westwood One?

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1 A. No. This was part of my duties at the
2 NRA.
3 Q. Okay. When you say "the NRA," are you --
4 were you an employee of the National Rifle
5 Association of America or one of its other
6 entities?
7 A. I was employed and am employed by the
8 National Rifle Association of America.
9 Q. Not by the lobbying group or the
10 foundation --
11 A. Oh, I see.
12 Q. -- none of those --
13 A. That is correct.
14 Q. And that's been the case during your
15 entire tenure?
16 A. That has been the case.
17 Q. Have you ever received compensation from
18 the National Rifle Association Foundation?
19 A. No, I have not.
20 Q. Or any other entity of the National Rifle
21 Association apart from the NRA itself?
22 A. No, I have not.
23 Q. Okay. Why did the Westwood One radio show
24 end?
25 MR. CHAMBERS: Objection, foundation.

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1 A. I don't know why it ended, which part --
2 and that would be which party ended it. I don't
3 know.
4 Q. And did your job responsibilities change
5 after the six or seven years that the show ran?
6 A. Yes, it did.
7 Q. In what way?
8 A. By that time I had -- had been to
9 committee members, began to develop relationships
10 with the board and officers and began to be used as
11 an avenue of communication, and by this time I was
12 also more heavily involved in conservative
13 outreach, diversity outreach, state organization --
14 state gun organization outreach. Much of it
15 happened organically, but it -- it just kind of
16 flowed.
17 Q. You mentioned your first title was special
18 assistant to the -- to Mr. LaPierre. What was your
19 next title?
20 A. I think -- I think it might have been
21 director of external affairs, but I am not sure.
22 Q. Did your office change when you became
23 director of external affairs?
24 A. My office changed all the time because
25 there's not enough space on -- on the floor.

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1 Q. Did your pay change when you became
2 director of external affairs?
3 A. I was given increases all along the way.
4 I don't know whether a pay change occurred
5 concurrent with a title change.
6 Q. And who would make the determination of
7 what your compensation would be?
8 A. That would -- I assume that was discussed
9 with Mr. LaPierre and Mr. Phillips, who was the
10 treasurer at the time.
11 Q. And that's Wilson Phillips, who we call
12 Woody Phillips?
13 A. That is correct.
14 Q. Anybody else that you know of that would
15 be involved in compensation decisions for your
16 compensation?
17 A. No.
18 Q. What was your initial salary when you
19 became special assistant?
20 A. I don't remember. I'm sorry. I -- I can
21 easily obtain that, but I don't remember.
22 Q. I assume it was more than you were making
23 as a teacher, though; is that right?
24 A. Considerably. Catholic school elementary
25 teacher, yes.

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1 Q. Was it double what you were making as a
2 teacher?
3 A. It was probably more.
4 Q. More than double?
5 A. Yes.
6 Q. And when you were offered the position was
7 there any background check that you had to go
8 through before you were hired?
9 A. I don't know.
10 Q. Did you have to deal with the -- any
11 personnel office as far as vetting you for the
12 position?
13 A. I don't remember. I think probably, but I
14 don't remember any of that.
15 Q. What you remember is the offer came from
16 Mr. LaPierre and that was all that you needed; is
17 that your understanding?
18 A. That is correct.
19 Q. Okay. And did you discuss compensation
20 with Mr. LaPierre?
21 A. I think he offered a salary, and I said
22 yes because it was -- it was nice compared to being
23 a music teacher.
24 Q. And that was in the discussion when you
25 said you had to go back and finish your contract;

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1 is that right?
2 A. My teacher's contract.
3 Q. Okay. So you knew at that point what your
4 salary was going to be if you left your teaching
5 and came to the NRA; is that right? It was not a
6 surprise when you started working you got a salary?
7 A. That is correct. I don't know whether a
8 salary was discussed at that time or at the end of
9 my teaching, but I knew that it would be more than
10 I was making at St. Pius just by natural deduction.
11 Q. Did you discuss with Mr. LaPierre your
12 employment history before he hired you?
13 A. He knew I was a music teacher. I don't
14 remember other discussions than that.
15 Q. Okay.
16 THE WITNESS: Could I take a bathroom
17 break?
18 MR. DICKIESON: Sure.
19 THE VIDEOGRAPHER: We are going off the
20 record at 11:00 a.m.
21 (A short break was had.)
22 THE VIDEOGRAPHER: We're going back on the
23 record at 11:10 a.m. This is the beginning of
24 media unit No. 2 in the deposition of Millie
25 Hallow.

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1 BY MR. DICKIESON:
2 Q. Ms. Hallow, before we went off the record
3 we were discussing what sort of background check
4 the NRA may have done before they hired you. Do
5 you have any knowledge of disclosing any of the
6 more sensitive information in your background to
7 anyone at the NRA?
8 MR. CHAMBERS: Objection, form.
9 A. I -- I don't.
10 Q. Okay. Let me clarify my question. Have
11 you ever been accused of a crime?
12 A. I -- I was accused of the crime in -- at
13 the D.C. Commission on Arts and Humanities.
14 MR. DICKIESON: Let's have marked as
15 Exhibit 2 a public record from the criminal
16 division of the Superior Court of the District of
17 Columbia.
18 (Hallow Exhibit 2 was marked
19 for identification.)
20 BY MS. DICKIESON:
21 Q. As you read Exhibit 2, does this relate to
22 the accusation that we just talked about?
23 A. I have not seen this before, but I can see
24 Mitch Rogovin and Ronna Beck and they were my
25 lawyers during that period of time. I don't -- and

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1 my name is -- my name is on. So the answer would
2 be yes, but I have not actually seen this. Or
3 maybe I have, but I don't remember it.
4 Q. Okay. What was the crime that you were
5 charged with?
6 A. I was charged with misappropriating funds
7 from the D.C. Commission on Arts and Humanities.
8 Q. And did you plead guilty to that crime?
9 A. I did.
10 Q. What was the amount that you were charged
11 with misappropriating?
12 A. Around 22- or 23,000. I -- I do not
13 remember.
14 Q. Were you terminated from that position
15 when this was discovered?
16 A. Effectively. I -- I think I was allowed
17 to resign.
18 MR. DICKIESON: Okay. Let's have marked as
19 Exhibit 3 a Washington Post article from
20 August 18th, 1984.
21 (Hallow Exhibit 3 was marked
22 for identification.)
23 BY MR. DICKIESON:
24 Q. This article refers to Mildred Bautista.
25 That's -- that's you at this time?

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1 MR. CHAMBERS: Counsel, can I have a
2 second --
3 MR. DICKIESON: Sure.
4 MR. CHAMBERS: -- to go through the
5 article?
6 (Witness reviewing document.)
7 A. Yes, sir.
8 Q. Is -- is that article a true summary of
9 the situation?
10 MR. CHAMBERS: So we're going to object.
11 It's your deposition and you can ask the questions
12 you want, but she's acknowledged on the record that
13 she was accused of the crime and she pled guilty to
14 it. I'm not sure what's to be served by rehashing
15 this again in an article that was printed not by
16 her. So we'll just get on the record that we're
17 objecting to this line of question.
18 MR. DICKIESON: And as we discussed before
19 the deposition, no speaking objections, but your
20 objection is noted.
21 MR. CHAMBERS: Thank you.
22 BY MR. DICKIESON:
23 Q. Is this an accurate reflection of the
24 facts involving your guilty plea?
25 A. Some I simply don't remember. It was an

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1 awful and humiliating time. I know that I did
2 wrong. I haven't read this article or, if I did, a
3 long time ago. Some of the things I'm surprised.
4 So I can't -- I mean -- but yes, I took money
5 inappropriately and was -- and -- and paid the
6 price, yes.
7 Q. When you say you paid the price, there was
8 a reimbursement requirement, a restitution
9 requirement. Did you make that full payment back?
10 A. Yes.
11 Q. Okay.
12 This article --
13 A. Over a number of years.
14 Q. Okay.
15 This article also refers to in the --
16 about fourth-fifths down the page "Prior to being
17 appointed director of the Arts Commission, Bautista
18 had resigned her job as assistant to the
19 superintendent of schools in Ann Arbor, Michigan
20 when the school board found that she had falsified
21 her resume."
22 Did you work in Ann Arbor, Michigan?
23 A. I was -- yes. Yes, I did.
24 Q. And we didn't -- that didn't come up when
25 we were discussing your background. Is there --

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1 how long did you work in Ann Arbor, Michigan?
2 A. I was -- I think a little more than a
3 year. A team -- I was with the school district of
4 Philadelphia and an assistant superintendent was
5 hired to be the new superintendent in Ann Arbor,
6 and a bunch of us went out with him.
7 Q. Is the statement true that you had
8 falsified your resume in getting that position in
9 Ann Arbor?
10 A. I don't remember. I might have. I -- I
11 don't remember a lot about that part of my life.
12 Q. Okay. And how long did you work in
13 Philadelphia?
14 A. A year. My husband was at the vet -- got
15 a job at the veterinary school at Philadelphia. I
16 first worked for the D.C. Chamber of Commerce --
17 these are entry-level positions -- and then
18 somebody who was on the Chamber of Commerce became
19 the first black board member for the school
20 district of Philadelphia and asked me to come and
21 do some work.
22 Q. And is that the person that then moved to
23 Ann Arbor and you went with them or --
24 A. No. It was in another division. I don't
25 remember how I got to know the person that became

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1 superintendent, but I became involved in a romantic
2 relation with someone who worked for him.
3 Q. This was in Philadelphia?
4 A. This is in Philadelphia.
5 Q. And is that why you then moved to Ann
6 Arbor?
7 A. That is correct. I dissolved my marriage
8 to -- my first marriage and went with this other
9 person to Ann Arbor.
10 Q. Who was the other person?
11 A. His name was Philip McInay.
12 THE REPORTER: What's the last name?
13 THE WITNESS: M-C capital I-L-N-A-Y.
14 BY MR. DICKIESON:
15 Q. In what way did you falsify the resume?
16 MR. CHAMBERS: Objection, foundation.
17 A. I don't -- I don't remember. I don't
18 remember. I had this -- ended a marriage,
19 whirlwind courtship, went to -- I just -- I don't
20 remember. It was a troubled time.
21 Q. Did it relate -- to your best
22 recollection, did it relate to your level of
23 education or did it relate to your job experience?
24 A. I don't remember.
25 Q. You don't have a bachelor's degree; is

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1 that correct?
2 A. No, I do not. You know, well short.
3 Q. When you left Ann Arbor you moved to
4 Washington, D.C.; is that correct?
5 A. With Philip McInay.
6 Q. Okay. And what was Mr. McInay's position
7 in Washington?
8 A. He established a consulting firm which I
9 was the only other employee. We were living
10 together and did a lot of consulting for National
11 Institute of Education at that time.
12 Q. Both of you --
13 A. Both of us.
14 Q. -- were consulting?
15 What was the reason for the -- I'll call
16 it the embezzlement of the 23,691 that's referred
17 in the article?
18 MR. CHAMBERS: Objection, form.
19 A. The reason?
20 Q. Yes.
21 A. I'm not quite sure what you're --
22 Q. Were you and Mr. McInay in debt? Did you
23 need the money?
24 A. No, but then I was with Mr. Walters. We
25 did a lot of entertaining that was probably beyond

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1 our means, and that is my recollection.
2 Q. Do you have any training in accounting
3 matters?
4 A. I do not.
5 Q. Do you -- how long did the scheme last?
6 MR. CHAMBERS: Objection, form.
7 A. First, I would not have called it a
8 scheme, and, two, if there's a starting and ending
9 date, I don't know during the time I was there.
10 Q. Do you know how many checks were involved?
11 A. I don't remember any checks at all. So
12 that's one of the things that -- I just -- I don't
13 remember.
14 Q. Okay. About halfway down the page on
15 Exhibit 3 it says "Bautista, a researcher for a
16 private firm since resigning her commission post in
17 March, was accused of writing checks against Arts
18 Commission accounts to people who did not exist or
19 to people who were not owed money and then forging
20 the endorsement."
21 Is that an accurate statement of what you
22 were doing?
23 A. Not to me. I don't remember that at all.
24 Q. What -- what do you remember was your
25 crime?

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1 MR. CHAMBERS: Objection. Can we go off
2 the record?
3 MR. DICKIESON: Sure.
4 THE VIDEOGRAPHER: We're going off the
5 record at 11:24 a.m.
6 (A short break was had.)
7 THE VIDEOGRAPHER: We're going back on the
8 record at 11:31 a.m.
9 BY MR. DICKIESON:
10 Q. I believe before we took a break my
11 question was what was the criminal action that you
12 believe that you took with the funds?
13 MR. CHAMBERS: Objection. For the record,
14 counsel for Ms. Hallow objects to this line of
15 questioning. You can answer, Millie.
16 A. I -- my recollection was that it largely
17 had to do with entertaining, food and beverages. I
18 just said that I don't -- I don't remember this.
19 Q. Okay. How long did it take you to
20 complete the restitution, repaying the 23,000 to
21 the city?
22 A. Four or five years. No. Okay. Four --
23 four or five years I would guess.
24 Q. And your probation was five years; is that
25 correct?

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1 A. It was -- it was unsupervised. So I don't
2 even remember a notice saying it was over. I never
3 spoke to anybody I don't think or that I remember.
4 Q. Do you dispute that the sentence was five
5 years probation?
6 A. If that's -- is that what the record
7 shows? I don't dispute whatever a record shows.
8 Q. When you first started to work with
9 Mr. LaPierre did you tell him you were on
10 probation?
11 MR. CHAMBERS: Objection.
12 A. I -- it was a long time after that. I was
13 not.
14 Q. You were -- you were not on probation in
15 1994 when you did the book tour; is that right?
16 A. As a consultant, correct.
17 Q. Okay.
18 Did you disclose anything about this
19 criminal history to anyone at the NRA when you
20 were -- during the '90s?
21 MR. CHAMBERS: Objection.
22 A. I don't remember. I -- I don't remember.
23 Q. Did the NRA at some point learn about this
24 criminal guilty plea?
25 MR. CHAMBERS: Objection, foundation.

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1 THE WITNESS: I might know this only in a
2 privileged conversation.
3 MR. CHAMBERS: Then we'll instruct her not
4 to answer.
5 BY MR. DICKIESON:
6 Q. Okay. Let me go into the details of the
7 privilege. When -- when did this conversation take
8 place?
9 A. I'm not sure. Last -- last summer
10 perhaps.
11 Q. Who was present during the conversation?
12 A. I don't know what to say.
13 MR. CHAMBERS: All right. Can we --
14 MS. FISHER: Can we take a minute to talk
15 about it? Or we can talk about it at the break and
16 you can come back to this particular question?
17 MR. DICKIESON: Let's talk about it now.
18 Let's go off the record.
19 THE VIDEOGRAPHER: We're going off the
20 record at 11:35.
21 (A short break was had.)
22 THE VIDEOGRAPHER: We're going back on the
23 record at 11:43 a.m.
24 BY MR. DICKIESON:
25 Q. My question is who was present in the

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1 conversation that you think might be privileged?
2 MR. CHAMBERS: Objection. Counsel
3 maintains the privilege objection.
4 MR. COLLINS: And on behalf of the NRA, as
5 counsel for the NRA, I also assert the privilege
6 objection and would say to you that the NRA's
7 privilege is the NRA's privilege and you as an
8 employee of the NRA do not have the right to waive
9 that privilege on behalf of the NRA.
10 THE WITNESS: Okay. I understand.
11 MR. DICKIESON: Perhaps you could explain
12 to me why asking who's present is a privileged
13 question.
14 MR. COLLINS: You just want names, not
15 what was said?
16 MR. DICKIESON: Just names.
17 MR. COLLINS: I don't have a problem with
18 if she remembers names.
19 A. It was a conversation I had with Wayne
20 LaPierre who told me --
21 MR. COLLINS: Don't -- don't talk about
22 what you talked about.
23 THE WITNESS: No, but that he got -- the
24 name of the other person? Just stop?
25 MR. CHAMBERS: Let counsel ask you another

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1 question.
2 THE WITNESS: Okay. I'm sorry. I'm not
3 sure what I can say or not.
4 BY MR. DICKIESON:
5 Q. Okay. Is it your understanding Wayne
6 LaPierre is an attorney?
7 A. He is not.
8 Q. Was he giving you any advice when he
9 communicated this to you?
10 A. It was not advice.
11 Q. What did he tell you?
12 MR. COLLINS: I'm going to object to that
13 to the extent what Mr. LaPierre was telling you was
14 repeating what he was told by an attorney for the
15 NRA or Mr. LaPierre.
16 MR. DICKIESON: I don't think that's a
17 valid privilege objection.
18 MR. COLLINS: I understand, but we are
19 going to assert that objection as to that question.
20 And to the extent Mr. LaPierre was discussing with
21 you a conversation he had with an attorney
22 concerning NRA's knowledge, we would instruct you
23 as an employee of NRA to respect that privilege.
24 THE WITNESS: I understand.
25 BY MR. DICKIESON:

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1 Q. So what did Mr. LaPierre tell you?
2 MR. CHAMBERS: Objection.
3 MR. COLLINS: Same objection.
4 MR. DICKIESON: Go ahead and answer.
5 MR. CHAMBERS: I'm instructing the witness
6 not to answer.
7 MR. COLLINS: And on behalf of the NRA, as
8 I said earlier, that's the NRA's privilege, not
9 yours or Mr. LaPierre's, and you do not have any
10 right to waive Mr. LaPierre's -- or Mr. -- or the
11 NRA's privilege. I guess are you going to
12 respect -- are you going to follow my instruction
13 to you?
14 THE WITNESS: Yes, I will.
15 BY MR. DICKIESON:
16 Q. Who is -- you have three attorneys at this
17 deposition. Who is paying for the attorneys for
18 this deposition for you?
19 A. My attorneys?
20 Q. Yes.
21 A. I'm not sure.
22 Q. Are you paying for them?
23 A. I am not.
24 Q. And you don't know where the money's
25 coming to pay for these three attorneys sitting

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1 here?
2 MR. CHAMBERS: Objection, asked and
3 answered.
4 A. I'm not sure.
5 Q. Okay. Is the NRA paying for the three
6 attorneys?
7 MR. CHAMBERS: Objection, asked and
8 answered.
9 A. I'm not sure.
10 Q. Did Mr. LaPierre, in this conversation
11 where apparently your criminal conviction was
12 raised, did he tell you which attorney gave him
13 information about it?
14 MR. CHAMBERS: Hold on. I'm going to
15 instruct her not to answer that question, but can
16 we maybe give a more concise question that gets to
17 that last part of the question?
18 BY MR. DICKIESON:
19 Q. In this conversation that we're
20 discussing, who is the attorney that's involved
21 that told Mr. LaPierre something?
22 MR. COLLINS: On behalf of the NRA and
23 Mr. LaPierre, we have no objection to you just
24 saying the name of the attorney to the extent you
25 knew or now remember who that attorney was. Just

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1 the name.
2 A. Just the name. Bill Brewer.
3 Q. Okay. Have you had any discussions with
4 Mr. Brewer at any time?
5 A. On this topic?
6 Q. On any topic at any time. Do you interact
7 with him at all?
8 A. In group meetings. I have talked with him
9 one on one, but for small talk. So not in any
10 formal way.
11 Q. Has he ever given you legal advice?
12 MR. COLLINS: You can answer that yes or
13 no. You mean she personally?
14 MR. DICKIESON: Yes.
15 A. No.
16 Q. Has he ever served as your attorney?
17 A. No.
18 MR. CHAMBERS: In her individual capacity?
19 MR. DICKIESON: Correct.
20 THE WITNESS: Thank you.
21 BY MR. DICKIESON:
22 Q. Has he ever called you to your face that
23 you're a serial larcenist?
24 A. No.
25 Q. Have you heard that he's called you that?

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1 A. No.
2 Q. Is it your understanding that the
3 conversation you had with Mr. LaPierre was relaying
4 advice to you in some way?
5 MR. COLLINS: Again, I'm going to instruct
6 you not to get into any substance of the
7 conversation with Mr. LaPierre that was discussed a
8 few questions ago.
9 A. I don't think I can characterize it in a
10 way that respects your objection.
11 Q. Okay.
12 What was the purpose of the conversation
13 you had with Mr. LaPierre?
14 MR. CHAMBERS: Objection, foundation. You
15 can answer.
16 A. I -- I don't know what you mean.
17 Q. Well, let's describe the circumstances of
18 that conversation. Where did it take place?
19 A. I don't remember it specifically.
20 Probably at headquarters, but I don't remember
21 specifically where.
22 Q. Was there anyone else involved in the
23 conversation other than Wayne LaPierre and you?
24 MR. CHAMBERS: So we're going to object
25 and ask that we move on. We've asserted on behalf

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1 of our -- I've instructed my client not to answer
2 questions that might infringe on the Association's
3 privilege, and our concern at this point is that
4 these questions are designed to get around that
5 objection.
6 I understand you disagree. I think it's
7 something we can handle after the course of this
8 deposition. I'm going to ask the witness not to
9 answer any more questions related to this
10 particular conversation.
11 MR. COLLINS: And on behalf of the NRA we
12 would make that same request of the witness.
13 MR. DICKIESON: Counsel, I'm entitled to
14 get the surrounding facts so that I can file a
15 motion to compel that says this is what we know
16 about this conversation, it doesn't meet the
17 requirements of a privileged conversation. I'm
18 entitled to have that leeway to ask those kinds of
19 questions.
20 So unless you are intending to deny me
21 that opportunity to explore whether or not this
22 really is privileged...
23 MR. CHAMBERS: We maintain our objection.
24 We think we've provided more than enough room for
25 you to ask the questions. So file whatever motion

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1 that you like, but I am going to instruct the
2 witness not to answer any more of these probing
3 questions about this particular conversation in
4 hopes of maintaining the privilege that we have
5 asserted and that the NRA has asserted.
6 MR. DICKIESON: I'm going to make my
7 record. You can instruct her each time.
8 MR. CHAMBERS: Okay. That's fine.
9 BY MR. DICKIESON:
10 Q. Was this discussion about your criminal
11 history, was it the only thing involved in this
12 conversation or were there other things involved?
13 MR. CHAMBERS: Objection. Millie, I'm
14 going to instruct you not to answer the question.
15 MR. DICKIESON: It's a yes-or-no answer.
16 MR. COLLINS: Same objection on behalf of
17 the NRA, instruct you not to answer.
18 MR. DICKIESON: And you're not going to
19 answer if there was anyone else involved in the
20 conversation?
21 MR. CHAMBERS: Objection. I'm instructing
22 our witness not to answer this question.
23 BY MR. DICKIESON:
24 Q. Was Josh Powell involved in the
25 conversation?

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1 MR. CHAMBERS: Objection. Instructing the
2 witness not to answer for the same reasons that
3 we've mentioned. This is designed, in our view, to
4 defeat a privilege that's been properly asserted.
5 MR. COLLINS: And on behalf of the NRA we
6 would make the same objection.
7 BY MR. DICKIESON:
8 Q. What happened, if anything, after the
9 conversation? Were you disciplined in some way?
10 MR. CHAMBERS: Objection. Millie, I'll
11 instruct you not to answer that question for the
12 same reasons previously stated.
13 MR. COLLINS: Same objection on behalf of
14 the NRA.
15 MR. DICKIESON: What's the basis for that
16 objection?
17 MR. CHAMBERS: The basis for the
18 objection, Counsel, is that you are -- we believe
19 that you are attempting to get to the substance of
20 a privilege conversation.
21 MR. DICKIESON: Not if I'm asking her what
22 actions were taken as a result.
23 MR. CHAMBERS: Those answers could
24 directly indicate the substance of a privileged
25 conversation.

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1 BY MR. DICKIESON:
2 Q. You testified you thought this was in the
3 summer of 2018; is that correct?
4 A. Later than that. '19 -- '18. I'm not
5 sure. I'm just not sure.
6 Q. When was Mr. Brewer retained by the NRA?
7 MR. CHAMBERS: Objection, foundation.
8 A. I don't know.
9 Q. Do you know if Mr. Brewer prepared what's
10 been called a burn book on you of incriminating
11 facts against you?
12 A. I do not know.
13 Q. Do you know how Mr. Brewer may have found
14 out about your criminal past?
15 MR. CHAMBERS: Objection.
16 A. I do not know.
17 Q. Did you have any discussions with
18 Mr. Brewer about your criminal past?
19 A. I have not.
20 Q. Have there been any subsequent discussions
21 with Mr. LaPierre about your guilty plea?
22 MR. CHAMBERS: Objection. Millie, I'm
23 going to instruct you to answer that question to
24 the extent you're able to include conversations
25 separate from the privileged conversation that

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1 we've been discussing for the past 15 minutes.
2 MR. COLLINS: Same objection by us. And
3 honestly, I can't tell now whether those again are
4 related, whether it was the same day and therefore
5 probably related or three months later. So...
6 A. No, I have not.
7 Q. You have not had any subsequent
8 conversations; is that your answer?
9 A. Correct.
10 Q. Okay. Have you had any subsequent
11 conversations -- and I'll start this by asking with
12 anyone about your criminal record?
13 MR. COLLINS: Subsequent to the
14 conversation with --
15 MR. DICKIESON: With Mr. LaPierre she's
16 discussed.
17 MR. CHAMBERS: Okay. Again, if it was
18 with attorneys for the NRA, I would instruct you
19 not to answer. If it was with someone else --
20 MR. DICKIESON: This is a yes-or-no
21 question, has she had the conversations, not who it
22 was had with.
23 MR. COLLINS: I understand.
24 A. Conversations that I initiated?
25 Q. Yes. We'll start there.

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1 A. Not conversations I initiated.
2 Q. Okay. Did you have conversations that you
3 did not initiate about your criminal record?
4 MR. CHAMBERS: Objection, vague.
5 MR. DICKIESON: Go ahead and answer.
6 MR. COLLINS: Again, yes or no.
7 A. Yes.
8 Q. Who were those conversations with?
9 A. There was a blog post about this last
10 year, and -- and a number of NRA board members
11 reached out to me to say that they valued me.
12 Q. Okay. Who were those board members?
13 A. Sandy Froman.
14 THE REPORTER: What's the last name?
15 A. F-R-O-M-A-N. Marion Hammer, Carolyn
16 Meadows. There were probably half a dozen more,
17 but those are the ones that came to mind.
18 Q. Did you discuss with them the
19 circumstances of your crime?
20 MR. CHAMBERS: Objection. Millie, don't
21 answer that question. Counsel, the circumstances
22 of her crime is incredibly vague. Can you specify
23 what the question is that you're asking her?
24 MR. DICKIESON: Did you have a substantive
25 conversation about your criminal record apart from

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1 them just saying they supported you?
2 A. It was clear they had read the blog,
3 whatever posted, and people said things like long
4 time ago and we're supportive. I thanked them. I
5 wasn't in a position to be particularly articulate
6 or pursue it.
7 Q. As a convicted felon can -- can you have
8 access to firearms?
9 A. I cannot.
10 Q. Are there any firearms in the office at
11 the NRA?
12 MR. CHAMBERS: Objection.
13 A. Not in my office and not in -- I am just
14 going to say not in my office.
15 Q. And there are none in your home; is that
16 correct?
17 A. There is one that is owned by my husband.
18 Q. And what weapon is that?
19 MR. CHAMBERS: Objection, relevance.
20 A. It's a -- I think it's a police 45.
21 Q. Okay. I want to talk about your work at
22 the NRA and focusing in on the period beginning in
23 2018.
24 A. '18?
25 Q. Yes. There's going to be a number of

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1 exhibits I'm going to give to you and we're going
2 to talk about the work you're doing that's
3 reflected in the e-mails.
4 MR. DICKIESON: So let's get started
5 with -- the next exhibit is 4; is that right?
6 THE REPORTER: Yes.
7 (Hallow Exhibit 4 was marked
8 for identification.)
9 BY MR. DICKIESON:
10 Q. Take a minute to review that, and then my
11 first question will be if this is, in fact, your
12 e-mail message in -- of February 15th, 2018?
13 MR. CHAMBERS: Counsel, can you spare one
14 more copy?
15 MR. DICKIESON: Yeah.
16 MR. CHAMBERS: Thanks.
17 (Witness reviewing document.)
18 A. Okay, sir.
19 Q. All right. So is this an e-mail from you
20 to Mr. Nader Tavangar?
21 A. I don't remember the e-mail specifically,
22 but I don't dispute it.
23 Q. Okay. And were -- did you have
24 responsibilities for -- at this period of time in
25 2018 for coordinating various conferences and

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1 speaking opportunities for NRA personnel?
2 A. Some conferences. CPAC certainly, less --
3 less influence on others.
4 Q. Okay. And CPAC, is that related to the
5 American Conservative Union?
6 A. It is the -- a conservative conference
7 that's a product of the American Conservative
8 Union.
9 Q. And that's where your son works; is that
10 right?
11 A. That's correct.
12 Q. Okay. So what is -- what was your role
13 on -- for CPAC? What did you do for the NRA for
14 CPAC?
15 MR. CHAMBERS: Objection, foundation.
16 A. I -- beyond -- I helped -- I made sure
17 that appropriate NRA people got appropriate
18 speaking slots. The NRA is a sponsor of CPAC and
19 made sure that there were passes and that kind of
20 thing. I was also helpful in -- I tried to be
21 helpful in -- because I had by this time pretty
22 deep ties to the conservative community, helpful in
23 thinking about new faces to be put on this panel or
24 that.
25 Q. And when you say the NRA is a sponsor of

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1 CPAC, what does the NRA contribute financially to
2 CPAC?
3 A. It is an upper-level sponsor, not the
4 biggest sponsor. It's -- I think it's a hundred
5 thousand dollars.
6 Q. Per year?
7 A. Yes, reviewed every year. That would --
8 could I just say that would include signage and all
9 of that stuff too.
10 (Hallow Exhibit 5 was marked
11 for identification.)
12 BY MR. DICKIESON:
13 Q. Okay. Let's look at the next exhibit,
14 which will be No. 5, a February 15th, 2018 e-mail
15 from you to Nader Tavangar.
16 A. Look at it in conjunction with this first
17 one?
18 Q. No, you can set that one aside.
19 (Witness reviewing document.)
20 A. Okay, sir.
21 Q. So is this an e-mail that you wrote on
22 February 15th, 2018?
23 A. I don't remember it specifically, but it
24 is -- I'm sure it is.
25 Q. And in the embedded e-mail from Lori Klein

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1 to you there's a reference to Colonel Ollie North
2 saying "Colonel Ollie North might be great." This
3 is before Mr. -- Colonel North became -- was
4 negotiating to be a contract president of the NRA;
5 is that correct?
6 A. I believe so.
7 Q. And he had a valuable brand name at that
8 time, in February of 2018, that would be attractive
9 to people for this Western Conservative Conference?
10 MR. CHAMBERS: Objection, form.
11 A. Oliver North was requested regularly
12 through NRA channels, whether it was for NRA events
13 or other kinds of events that they wanted him for.
14 He was one of the few celebrities that NRA could be
15 responsive for.
16 Q. And he was a board member at that time; is
17 that right?
18 A. He's -- he's been a board member for a
19 good time.
20 Q. Was he on any of the other board
21 committees?
22 A. I -- I can say that I remember he chaired
23 military and veteran affairs, and I believe he was
24 on the Public Affairs Committee. I don't know if
25 there were any others.

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1 Q. Were you involved in the decision to
2 request that Oliver North become president of the
3 NRA?
4 A. I was not involved in the decision.
5 Q. Were you involved in the process?
6 A. I -- in a memo shared with my lawyers it
7 looked like I facilitated an early meeting.
8 MR. CHAMBERS: That's fine. Go ahead.
9 Just for the record, Ms. Hallow's last
10 answer is not meant to waive any privileges.
11 MR. DICKIESON: I understand.
12 BY MR. DICKIESON:
13 Q. What do you recall about facilitating an
14 early meeting? Who was the meeting between?
15 A. It was between Wayne LaPierre, Oliver
16 North, Tom Kilgannon, who's president of Freedom
17 Alliance, which was Colonel North's 501(c)(3)
18 veterans organization, and I attended the meeting
19 as well.
20 Q. Where was the meeting?
21 A. Part of what I facilitated was where the
22 meeting would be because Wayne and -- Wayne
23 LaPierre and Colonel North's schedule, it was hard.
24 It ended up being on a Sunday at Freedom Alliance.
25 Q. Is that Mr. North's farm, Oliver North's

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1 farm?
2 A. No. It is the -- it's west of Dulles.
3 It's an actual office complex. It's not -- it's
4 not his home, which is in -- which is further out.
5 Q. Okay.
6 What -- what was discussed at that
7 meeting?
8 A. There was a good deal of conversation
9 about whether this was a practical thing for
10 Colonel North to do. Also Colonel North's aide at
11 Freedom Alliance, Calvin Coolidge, was also there.
12 Mr. Coolidge basically traveled with Colonel North
13 on all of his speeches and how Colonel North would
14 honor his other obligations, given books and he had
15 a schedule that was several years in advance. And
16 at the -- at the end of that conversation it was --
17 it was -- my sense of what I remember was that it
18 wasn't a no, that people were going to examine
19 options, and that it was a positive beginning.
20 Q. Was there anyone from Ackerman McQueen at
21 the meeting?
22 A. Not at -- not at that meeting.
23 Q. Was Ackerman McQueen discussed at the
24 meeting?
25 A. I'm not sure whether it was discussed at

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1 that first meeting. I don't remember.
2 Q. Okay. Well, let me have you review what
3 will be Exhibit 6.
4 A. Is this one done?
5 Q. Yes.
6 MR. CHAMBERS: Dave, can we take a break
7 after this?
8 MR. DICKIESON: Sure.
9 MR. CHAMBERS: This document.
10 (Hallow Exhibit 6 was marked
11 for identification.)
12 BY MR. DICKIESON:
13 Q. If you could take a look at this document,
14 which for the record is a fax message dated
15 April 23rd, 2018 to Millie Hallow eyes only from
16 Noram Partners, LLC and signed by Oliver North.
17 Let me direct your attention to the point
18 of my last question. On the second page -- let me
19 ask the question first. Is this a message that
20 came to you subsequent to that meeting at Colonel
21 North's Dulles office?
22 A. I have never seen this message. What I do
23 know is that at some point subsequent to that first
24 meeting Colonel North had a document that he wanted
25 to fax to me not at the NRA and he wanted me to get

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1 it to Wayne, and I did so find a non-NRA fax and
2 delivered to Wayne. I did not look at it. Since
3 I've never -- I think this might be the document
4 because I've never seen this document.
5 Q. Okay.
6 Let me direct your attention to the second
7 page. It says item No. 1, "Options: A, direct
8 employee of AM or MG (preferred); B, fee for
9 service contract between Veritas Productions, LLC,
10 and NRA affiliated entity, AM or MG."
11 Does this refresh your recollection that
12 there were discussions about Ackerman McQueen or
13 Mercury Group during this meeting in April of 2018?
14 A. I know there were discussions about
15 Ackerman McQueen in subsequent meetings. I don't
16 remember that happening at the very first meeting,
17 but I have to say that I was in and out for some of
18 that time. Susan LaPierre was in another room at
19 Freedom Alliance and she wanted my help on another
20 project. So I was in and out of that meeting.
21 I -- I don't remember that at all in the first
22 meeting.
23 Q. Did you take notes during this meeting?
24 A. I did not.
25 Q. Did anyone take notes during the meeting

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1 that you know of?
2 A. I'm trying to envision it. I don't -- it
3 was so preliminary. I don't think anybody did.
4 Q. Did -- did Wayne LaPierre have his yellow
5 pad with him?
6 A. I don't think he did, but I'm not -- I'm
7 not sure, but it -- it was more a conversation is
8 my recollection.
9 Q. Do you recall the conversation involving
10 some way to replace the loss of income that
11 Colonel North would have if he came -- became
12 president of the NRA?
13 A. I don't remember that.
14 Q. Do you recall any discussion that
15 Colonel North would have to leave his position at
16 Fox if he were to become president of the NRA?
17 A. I -- I do remember a discussion of that
18 and how Colonel North wanted to make sure that he
19 did not start conversations with the Fox people if
20 this thing might not happen and that he really
21 needed to think about it, and he wanted to have a
22 full discussion with Mr. Sullivan, who is a
23 long-time legal -- you know, the Brendan Sullivan
24 person.
25 That's I think why I remember it as just a

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1 very general kind of overture meeting, but I must
2 say I can't -- I can't remember -- I remember that,
3 but I just -- it was kind of easing in, you know.
4 If this happened, I don't -- I don't recall it or
5 it happened when I was out of the room in terms of
6 talking about logistics of stuff and my
7 recollection is that that was much later.
8 Admittedly, I'm foggy on it.
9 Q. Okay. And so further down page 2 where it
10 says "Compensation, Option A, year 1, 2.1 million,
11 year 2, 2.3 million, year 3, 2.5 million," you
12 don't recall any conversations about compensation
13 for Mr. -- for Colonel North during this meeting?
14 A. On this I'm fairly sure that didn't
15 happen. Again, that doesn't -- that doesn't
16 comport with what I remember about the first
17 meeting.
18 Q. Because you were in and out of the room?
19 A. Yes, but, again, my recollection of the
20 first meeting was that it was not nitty-gritty.
21 There was no money or anything like that discussed.
22 It was rather more how will the board feel if this
23 happens, you know, what is the timing, what do the
24 other officers think. It was -- it was that kind
25 of conversation. That is my recollection.

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1 Q. Was there a discussion about why Pete
2 Brownell could no longer be president of the NRA?
3 MR. CHAMBERS: Objection, foundation.
4 A. I'm sure that must have been part of the
5 context of why Mr. LaPierre was asking if Ollie was
6 interested. I don't remember that it was, but I
7 think it would have had to be part of the
8 conversation.
9 Q. Was there discussion about the problem
10 that Mr. Brownell had with his trip to Moscow or
11 Russia?
12 MR. CHAMBERS: Objection, foundation,
13 vague.
14 A. Actually, I don't think so. I don't think
15 that came up.
16 Q. Okay. How long was the meeting?
17 A. Hour and a half. It wasn't that long,
18 and I remember it wasn't that long because I think
19 that this was squeezed within a time frame where
20 Colonel North had to -- had a speaking engagement,
21 Mr. LaPierre had -- they had commitments and this
22 was a time that they could make it work.
23 Q. Do you have any recollection of a position
24 at Ackerman McQueen being discussed in that
25 meeting?

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1 A. Not in this first meeting.
2 Q. Okay. Is it possible that this fax dated
3 April 23rd relates to some other meeting, a second
4 meeting --
5 MR. CHAMBERS: Objection.
6 BY MR. DICKIESON:
7 Q. -- that you're -- so you're describing a
8 different meeting than what's discussed in these
9 deal points?
10 MR. CHAMBERS: Objection to form.
11 A. I -- anything is possible. I wasn't in
12 all of the meetings, and I was not in any of the
13 negotiations.
14 Q. Did you have any discussions with Wayne
15 LaPierre subsequent to the meeting about making
16 Colonel North president of the NRA?
17 A. He was -- Mr. LaPierre was pretty excited
18 that Ollie was willing to consider it and when he
19 said affirmatively he would do it. They had been
20 friends for a number of years and it was a very up
21 moment.
22 Q. And that up moment was during the meeting?
23 A. The first meeting? The first meeting the
24 up moment was Wayne -- at the end of the meeting
25 and we're getting in our respective cars Wayne

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1 saying "He didn't say no."
2 Q. What was the next meeting you're aware of
3 between Mr. LaPierre and Colonel North about him
4 becoming president of the NRA?
5 A. I don't know. So this -- the -- the
6 annual meeting was coming up pretty quickly and
7 there was a bunch -- there were a bunch of
8 meetings. I was not a part of a lot of them simply
9 because it was not in my area if it was figuring
10 stuff out.
11 I tend to be event related, but there were
12 meetings after and they -- what I'm envisioning is
13 that the meetings -- because it had to be very
14 quiet, we didn't want people to know that Ollie --
15 Colonel North was being considered, and it was a
16 very limited group of people going into the
17 convention of Dallas that knew. So probably there
18 were no meetings at NRA headquarters, but I don't
19 know. I just -- I don't know.
20 Things move fast and I -- there were
21 meetings, but I don't remember anything of
22 significance. If -- ask me, but I -- it just sort
23 of moved.
24 Q. Were you aware of any meetings at the
25 Ackerman McQueen office?

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1 A. I would not be surprised to hear that, but
2 I don't think I attended any of them. Or if I did,
3 I was in and out.
4 MR. DICKIESON: Do you want to take a
5 break?
6 MR. CHAMBERS: Yeah. Why don't we take a
7 lunch break now.
8 THE VIDEOGRAPHER: We're going off the
9 record at 12:25 p.m.
10 (Whereupon, at 12:25 p.m., the
11 deposition was recessed, to
12 reconvene at 1:00 p.m., this
13 same day.)
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1 THE VIDEOGRAPHER: We're going back on the
2 record at 1:06 p.m. This is the beginning of media
3 unit No. 3 in the deposition of Millie Hallow.
4 BY MR. DICKIESON:
5 Q. Good afternoon.
6 A. Good afternoon.
7 (Hallow Exhibit 7 was marked
8 for identification.)
9 BY MR. DICKIESON:
10 Q. We're going to move up a few days. We
11 were talking about a meeting at the Dulles office
12 of Mr. -- Colonel North, and now on April 25th,
13 2018 -- I have an exhibit that we'll mark as
14 Exhibit 7. I'll give it to everyone.
15 For the record, this is an e-mail from
16 Millie Hallow to Christopher Cox with a copy to
17 Nader Tavangar. This e-mail states "WTF. Pete
18 should have pulled the plug the moment they started
19 to trash us. If they speak from the floor or do
20 media, we have Ollie and Allen ready -- Allen West
21 ready to respond."
22 What is the protest that you're talking
23 about here?
24 A. I'm scratching -- I'm -- this might -- so
25 Pete would have been presiding over the members

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1 meeting, not a board meeting. I don't remember.
2 Q. That's Pete Brownell; is that correct?
3 A. Yes. "Pete should have pulled the plug
4 the moment they started to trash us." So it had to
5 be at the members meeting where he was chairing,
6 and I don't remember the incident.
7 Q. And this is the annual members meeting; is
8 that correct?
9 A. Yes. Not the board meeting, the members
10 meeting.
11 Q. And then down embedded in this e-mail is a
12 message from Scott Christman to ccox@nrahq.org. It
13 says "Some of these guys will be protesting you and
14 Wayne in Dallas and Brownell is sponsoring an event
15 with them."
16 Does that refresh your recollection of who
17 these people are?
18 A. If -- possibly.
19 Q. What's your understanding?
20 A. There was a group of Internet -- I'm not
21 good on -- they were digital blogger-type things,
22 some of whom were affiliated with the military, and
23 Pete Brownell, President Brownell at that time, was
24 very keen on cultivating them anyway. He thought
25 they could be won over. These are people who

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1 considered the NRA too moderate.
2 And I have some vague recollection that it
3 backfired on him, and I think I sent Pete some
4 information that was from Scott Christman, who was
5 an aide to Chris Cox who kept an eye on all things
6 digital. And so that -- that's what it could be
7 related to, but I don't remember what actually
8 happened at the meeting.
9 Q. And so it's your understanding they were
10 protesting because the NRA was too moderate; is
11 that what you said?
12 A. Yes.
13 Q. And it wasn't having to do with the NRA's
14 finances?
15 A. Not in Dallas, not my recollection. There
16 was no --
17 Q. Was this something that Mr. Rob Pincus was
18 involved in, to your knowledge?
19 MR. CHAMBERS: Objection -- sorry,
20 Counsel. Go ahead.
21 A. I didn't hear the end.
22 Q. To your knowledge.
23 A. To my knowledge, no, but I'm not Internet
24 savvy, and he could have been doing stuff and it
25 didn't come to my attention or maybe no one was

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1 paying attention. I just -- I don't think so, but
2 I'm really not sure because I don't remember the
3 Dallas meeting as being contentious at all. But
4 obviously there was something that happened.
5 Q. And these were NRA members, though; is
6 that right?
7 A. You can only speak from the floor if
8 you're an NRA member. So I assume so, but other
9 than I was -- I clearly was exercised at the time,
10 but I can't remember it.
11 (Hallow Exhibit 8 was marked
12 for identification.)
13 BY MR. DICKIESON:
14 Q. Let's move to the next exhibit, 8, which
15 for the record is a February 15th, 2018 e-mail from
16 you to Nader Tavangar.
17 MR. COX: Just before you get started,
18 there have been a number of exhibits that you've
19 marked that have a Bates number CTRL-GD prefix. To
20 my knowledge, I've never seen these in the Ackerman
21 productions to date. Can you tell us where these
22 documents are coming from?
23 MR. DICKIESON: Sure. These documents
24 were copied in December when I was getting ready
25 for the first date for the deposition. I believe

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1 they've now been assigned some sort of a production
2 Bates number, but I don't -- I don't have that
3 offhand.
4 MR. COX: Okay, but to your knowledge,
5 these have been produced to us?
6 MR. DICKIESON: That's my understanding.
7 MR. GONZALEZ: I don't know if that's
8 accurate. They're being produced today, some of
9 them, and some of them may have been --
10 MR. COX: That's what led me to believe
11 whether this was in the production that you all
12 said was coming because a lot of these are Tavangar
13 documents that I don't recall seeing before. So
14 these are coming to us later today?
15 MR. GONZALEZ: Yes.
16 MR. DICKIESON: I stand corrected.
17 MR. COX: Will they have the CTRL prefix
18 --
19 MR. GONZALEZ: No
20 MR. COX: -- or are they going to have an
21 AMC?
22 THE REPORTER: Guys, one at a time.
23 MR. GONZALEZ: They have an AMC.
24 MR. COX: Okay.
25 BY MR. DICKIESON:

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1 Q. For the record, this is Exhibit 9; is that
2 right?
3 THE REPORTER: 8.
4 BY MR. DICKIESON:
5 Q. Exhibit 8 is an e-mail from you to
6 Mr. Tavangar. Do you recall this e-mail?
7 A. I don't specifically, but I think I know
8 what it's about.
9 Q. My question here is this e-mail refers to
10 NRA TV ads. Did you have responsibilities that
11 included some oversight over NRA TV?
12 A. I -- I do not, did not in -- in this memo
13 that was offered by Mr. Tavangar.
14 Q. Okay.
15 A. I -- I assume we used them, but I'm -- I'm
16 also not technically savvy.
17 Q. Were you -- in your role -- what was your
18 title in February 2018?
19 A. Managing director executive operations.
20 Q. And were you still working very closely
21 with Wayne LaPierre?
22 A. Yes.
23 Q. And would you attend most meetings with
24 him?
25 MR. COLLINS: I'm just going to object as

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1 far as definition of "meetings." What kind of
2 meetings?
3 A. What kind of meetings?
4 Q. For example, were you -- were you involved
5 in meetings that concerned NRA TV?
6 A. I attended some of those meetings at
7 Mercury Group with Mr. LaPierre, but I wasn't --
8 when there would be presentations, if it was
9 convenient, I would be invited to attend. If he
10 was going to be -- if Mr. LaPierre was going to be
11 at Mercury Group all day for one thing or another,
12 then I usually attended so that I could stay in
13 touch with the office. So I was in and out and in
14 and out, you know, and we could keep tabs on
15 things. I remember NRA TV presentations fairly
16 early on, but only as kind of done deals, not in
17 the creative part.
18 Q. Okay. Do you know if Wayne LaPierre was
19 involved in approving content for NRA TV programs?
20 A. I will say I think that is how it was
21 supposed to work.
22 Q. And did it, in fact, work that way?
23 A. To the extent that we got -- started
24 getting complaints and some of them came to me, so
25 it's only what I know, and I would bring that

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1 information to Mr. LaPierre, we've gotten a
2 complaint about this person on this show saying
3 this, he said I'll talk to them. I mean, he didn't
4 seem to be aware of it. That is my impression on
5 the maybe half a dozen occasions.
6 Q. Did you take notes at meetings you would
7 attend with Mr. LaPierre?
8 A. Not normally. Only if I was instructed
9 to, but not -- I didn't have that kind of role.
10 Q. Did Mr. LaPierre generally take notes at
11 these meetings?
12 A. If they were -- if they were about
13 speeches that he was going to have to give and
14 construct, big speeches, he took voluminous notes.
15 Mr. McQueen would be on the television screen and
16 other people would be in the room and they would
17 brainstorm, and Wayne just -- Wayne just wrote and
18 wrote and wrote -- Mr. LaPierre, excuse me -- and
19 then somebody from Ackerman McQueen, Bill Powers,
20 who was one of the speech writers, would write and
21 write and write. And then that would create a
22 first draft and people would come together, and
23 that was the kind of process for speech building.
24 Q. Are you aware of how Mr. LaPierre would
25 keep his notes?

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1 MR. CHAMBERS: Objection, form.
2 BY MR. DICKIESON:
3 Q. Let me rephrase the question. Did he --
4 did he have a whole cache of yellow pads stashed
5 somewhere?
6 A. He had a lot of yellow pads. I don't
7 know -- many he dragged around with him. I don't
8 know what his storage provisions were.
9 Q. Okay. When you say "many he dragged
10 around with him," why would he bring more than one
11 with him?
12 MR. CHAMBERS: Objection, foundation.
13 A. He had various topics by yellow pad, and
14 so he would go to different meetings and he would
15 pull out. He had things that he was holding in his
16 hands and then he would have a whole duffle bag of
17 yellow pads, and when the topic changed he would
18 pull out the yellow pad.
19 Q. When you say "duffle bag," do you mean
20 like a briefcase?
21 A. I mean a duffle bag on rollers.
22 Q. That he would cart around with him?
23 A. Yes.
24 MR. DICKIESON: Counsel, I think you've
25 been promising to turn over the yellow pads for

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1 many months. Is there any progress on that?
2 MR. COLLINS: I'll e-mail you by noon on
3 Monday what the status is.
4 MR. DICKIESON: Okay.
5 BY MR. DICKIESON:
6 Q. During these meetings where he had this
7 duffle bag would he be going in and out of the
8 duffle bag as the topics changed? What was the use
9 of the duffle bag?
10 A. I just think he liked to have them with
11 him. They reminded -- some of it was by topic, you
12 know, violence in the street, criminal justice
13 reform, all topics related to the Second Amendment,
14 and he -- he pulled them out. That was kind of
15 like his filing system.
16 Q. And did he use the same duffle bag all the
17 time?
18 MR. CHAMBERS: Objection, foundation.
19 A. The -- it changed through the years.
20 Q. But did he have more than one duffle
21 bag at a time --
22 A. No.
23 Q. -- full of stuff?
24 A. No.
25 Q. How big was this duffle bag?

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1 A. It was like an oversized roller bag that
2 you would bring on a plane, you know.
3 Q. So it would be too big to fit in an
4 overhead compartment on a plane?
5 A. Actually, I think he did fit it in an
6 overhead compartment.
7 Q. Did he ever give you copies of his notes
8 for any purpose?
9 A. No, because I couldn't read them. He has
10 terrible handwriting.
11 Q. Okay. To your knowledge, did he share
12 those notes with anyone?
13 A. He would use his notes to dictate to the
14 executive -- the secretary in the EVP's office. He
15 would dictate to her drafts of direct mail letters
16 or other things because nobody could read his
17 handwriting.
18 Q. When you say his secretary, are you
19 referring to Ms. Fischer?
20 A. I'm talking -- no, I am not. I'm talking
21 about the other secretary in the office, Patty
22 Steimetz.
23 THE REPORTER: What's the last name?
24 A. S-T-E-I-M-E-T-Z. She could take shorthand
25 and Andra Fischer could not.

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1 Q. What was Andra Fischer's role in the
2 office?
3 A. She was the -- she was Wayne LaPierre's
4 executive assistant.
5 Q. Is that the role that you first had when
6 you were -- back in the '90s for Mr. LaPierre?
7 A. No. Andra preceded me. She was already
8 in the office playing that role.
9 Q. We've seen very few e-mails that come from
10 Wayne LaPierre. Was it his practice to have other
11 people send him -- provide him printouts of
12 e-mails?
13 MR. CHAMBERS: Objection, form.
14 A. Wayne LaPierre does not do e-mail.
15 Q. Okay. So how does he communicate with
16 people he needs to communicate with?
17 A. There is an NRA e-mail address for Wayne
18 LaPierre that Andra Fischer scans on a regular
19 basis. She prints out for him stuff that she deems
20 he needs to see. She -- if there is a question
21 from a member that she feels somebody else can
22 answer, she sends it directly to that staff person
23 and says please draft a response for Mr. LaPierre
24 or please respond on behalf of.
25 Q. How would Mr. LaPierre communicate with

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1 Angus McQueen?
2 MR. CHAMBERS: Foundation -- objection,
3 foundation.
4 A. I'm not totally aware, but my impression
5 is mostly by phone and then more formally the
6 television thing that was set up at Mercury Group.
7 Q. There was a video hookup between the
8 offices?
9 A. Yes.
10 Q. Was that a secure hookup?
11 MR. CHAMBERS: Objection, foundation.
12 A. I have no idea. It was an -- it was not
13 set up by NRA.
14 Q. Do you know how often Mr. LaPierre would
15 have conversations with Mr. McQueen?
16 A. I'm -- I'm really not sure.
17 Q. Okay.
18 Did you ever hear Mr. LaPierre refer to
19 Angus McQueen as his yoda?
20 A. No, never.
21 Q. Did you ever hear Mr. LaPierre refer to
22 Tony Makris as his brother?
23 A. They both referred to each other as
24 brothers.
25 Q. Do you know why that was?

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1 A. They have a relationship of long duration
2 where they both socialized and did Second Amendment
3 work together. It was a -- it was a full
4 relationship.
5 Q. Did you socialize with Wayne LaPierre?
6 A. Not so -- not very extensively. He has
7 family. I have -- not extensively.
8 Q. Did you ever travel with Mr. LaPierre?
9 A. For work, certainly.
10 Q. What about for personal travel?
11 A. Not to my recollection.
12 Q. Did you ever travel overseas with
13 Mr. LaPierre?
14 A. Through -- actually not with him but
15 through the Freedom Alliance -- Freedom Alliance
16 and NRA hosted a number of conference cruises, and
17 Wayne LaPierre participated in them, as did I.
18 Q. And Freedom Alliance is Colonel North's
19 organization; is that right?
20 A. That is correct.
21 Q. So which -- how many of these conference
22 cruises did you participate in?
23 A. I think most of them because I ended up
24 being the kind of -- the primary liaison from NRA
25 in helping Mr. Kilgannon, the president of Freedom

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1 Alliance, construct who should be the speakers,
2 should we ask General Meese or Speaker Gingrich.
3 It was kind of collaborative that way.
4 Q. So when you say "most of them," is that
5 what, five, ten? How many?
6 A. We've been doing it for a long time and we
7 tend to do it every other year. So eight. Eight,
8 but I am totally guessing.
9 Q. And is the cruise destination a different
10 destination each time?
11 A. It -- there have been repeats. The
12 cruisers, the attendees -- and there's a core
13 group -- are sent a questionnaire on the boat right
14 then about where do you want to go to next, and
15 that informs -- helps inform our decision. Also if
16 there's a possibility that the Meeses -- the Meeses
17 and the Gingrichs were regular attendees -- that if
18 one was more convenient, we tended to want to
19 oblige them.
20 Q. And what were some of the destinations for
21 these cruises?
22 A. For the long time -- for a long time it
23 was just the Caribbean, various things in the
24 Caribbean. One to -- I think only once to Hawaii.
25 These would be like the seven-day things and when

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1 you were at sea that's when we would do our panels.
2 Alaska once. New England, Canada, that kind. We
3 did a Baltic cruise one year a long time ago, a
4 Mediterranean cruise one year, and -- and then we
5 have done -- the last two times, so that would be
6 in the last four years, we have done river boat
7 rather than Holland America. It's small -- more
8 intimate where the attend- -- we, that is the
9 cruisers for Freedom Alliance, we could inhabit the
10 whole boat, so that 150, and then we felt like
11 we -- people could be candid with one another.
12 Q. And was the NRA a sponsor of these
13 cruises?
14 A. The NRA and Freedom Alliance did them
15 together.
16 Q. And who paid for your ticket on these?
17 A. My ticket?
18 Q. Yes.
19 A. NRA.
20 Q. And would your husband go with you?
21 A. Yes.
22 Q. Did your son ever go with you?
23 A. He went on one where he was asked by
24 Freedom Alliance.
25 Q. And did NRA pay for your family members to

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1 go with you?
2 A. No, they did not.
3 Q. So you had to write a separate check for
4 that?
5 A. I -- that was -- I was not involved. That
6 was Freedom Alliance's invitation. I wanted that
7 separation.
8 Q. So my question is did you have to write a
9 separate check for their --
10 A. I did not write a check.
11 Q. Who paid for your husband to go on that
12 cruise?
13 A. My husband -- my husband was paid for --
14 let me back up. As we -- as we looked for speakers
15 for the panel, NRA and Freedom Alliance would say
16 we're each going to do five speakers that will be
17 key, and then either Freedom Alliance or NRA paid
18 for the travel of that person. And my husband was
19 usually on a panel and would be covered by either
20 Freedom Alliance or NRA. He was usually the
21 only -- he was usually the only political
22 journalist that was on -- on these cruises.
23 Q. So would it be fair to say that when you
24 and your husband traveled on these cruises you did
25 not have to come out-of-pocket for any of these

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1 expenses; is that right?
2 MR. CHAMBERS: Objection, form.
3 A. We certainly paid for our own incidentals.
4 Q. Okay. But apart from incidentals, it was
5 covered by either the NRA or Freedom Alliance,
6 correct?
7 A. That is correct.
8 (Hallow Exhibit 9 was marked
9 for identification.)
10 BY MR. DICKIESON:
11 Q. Let me get back to sort of office
12 procedures at the NRA. The next exhibit, which is
13 9, is an e-mail from Nader Tavangar -- excuse me --
14 it's from Millie Hallow to Nader Tavangar. All
15 right. This is a pretty simple exhibit to analyze.
16 This says "Print for W" and then it has an
17 Internet link. Is -- is that typical to -- first
18 of all, does W refer to Wayne LaPierre?
19 A. Yes, it does.
20 Q. So one of the things that people would do
21 is instead of sending him what they wanted him to
22 read, they would send something to someone close to
23 him and have them print it out for him; is that
24 right?
25 MR. CHAMBERS: Objection, form.

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1 A. I don't remember this specific one, but
2 this is how I was able to send stuff to Wayne that
3 came to my attention when he was traveling and
4 Nader was the one that was traveling with him.
5 THE REPORTER: I'm sorry.
6 THE VIDEOGRAPHER: Can we go off the
7 record for one second?
8 THE WITNESS: My microphone?
9 THE VIDEOGRAPHER: Your microphone is
10 fine. We're going off the record at 1:36 p.m.
11 (A short break was had.)
12 THE VIDEOGRAPHER: We're going back on the
13 record at 1:37 p.m.
14 BY MR. DICKIESON:
15 Q. So my question that arises from this
16 exhibit is what does Wayne LaPierre do with the
17 printouts that are handed to him? Does he put them
18 with his yellow notepads and carry them around, or
19 what does he do with them?
20 MR. CHAMBERS: Objection, foundation.
21 A. My observation when it's not complete is
22 that if it was something he wanted to keep and
23 reference later, he would keep it. If not,
24 something like this I would imagine he would read
25 and throw away.

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1 Q. When you say he would keep it, where would
2 he keep it or how would he keep it?
3 A. He'd stick it somewhere in a fold- -- in
4 the folder he was carrying later to put I don't
5 know where.
6 Q. Did he keep file cabinets in his office or
7 does he keep file cabinets in his office?
8 MR. CHAMBERS: Objection, foundation.
9 A. I -- I do not know of any file cabinets in
10 his office.
11 Q. You've been in his office many times,
12 though, I take it?
13 A. Yes.
14 Q. And you don't recall seeing any file
15 cabinets in there?
16 A. No. Sorry.
17 Q. Would he -- are there file cabinets
18 outside his office that he would use to store
19 materials?
20 MR. CHAMBERS: Objection, form.
21 A. I honestly -- I don't know. I've never
22 thought of that. I mean, he's this walking -- I
23 don't know.
24 Q. You gestured that he was walking like he's
25 got something in his arms, like lots of stuff in

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1 his arms?
2 A. All the time.
3 Q. And so what would happen to those
4 documents, to your knowledge?
5 A. He would bring them home at the end of the
6 day and they might show up the next day. I -- I
7 just haven't even thought about it. I have -- I
8 have -- let me say I have no clue. I don't know.
9 Q. Have you been to his home?
10 A. I have.
11 Q. And does he have documents visible that
12 are there?
13 A. Some.
14 Q. And there were some reports that he had
15 like a whole garage bay full of yellow pads. Have
16 you seen anything like that?
17 MR. CHAMBERS: Objection, form.
18 A. I have not been in his garage.
19 Q. Okay. Did you see file cabinets in his
20 home?
21 A. I've not been in his work study office
22 more than a couple of times. I don't think so, but
23 it's been a number of years since I've been there.
24 Q. To his home?
25 A. To his home.

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1 Q. What would be the reasons you would go to
2 his home?
3 A. Susan was giving -- Susan LaPierre would
4 be giving a surprise for him and I would be
5 invited. So semisocial, although they were all --
6 sometimes if we happened to be in a car together
7 going to a meeting and he'd forgotten something we
8 would drive to the home, but mostly a private
9 person.
10 Q. What was your role with respect to NRA
11 policies? Did you have any role in forming NRA
12 policies or collaborating with people on forming
13 NRA policies?
14 A. Not at all.
15 (Hallow Exhibit 10 was marked
16 for identification.)
17 BY MR. DICKIESON:
18 Q. Let's have introduced as the next exhibit,
19 Exhibit 10 I believe, another e-mail dated June 8,
20 2018. I'll read into the record what I want to
21 focus on, and that is the paragraph that you wrote
22 in this message to Ollie North, Richard Childress,
23 Carolyn Meadows, Pete Brownell where you state "I
24 actually think the below story is true both in
25 specifics and potential trend. This is an issue

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1 where Ollie can play a critical leadership role in
2 reaching out to returning and recently returned
3 veterans. We also have Mark Geist (Oz) ready and
4 will to serve and lead."
5 Did you make suggestions of these kinds of
6 policies when you -- in your role?
7 A. I made recommendations, and this original
8 e-mail from John Carter, John Carter sent out a
9 plethora of e-mails that he thought would be of
10 interest to NRA, and I -- I don't remember why, but
11 I was struck by the article at the time. It's
12 2018. Ollie is in the process -- Colonel North is
13 in the process of becoming president and there had
14 already been much conversation about how he could
15 play a unique role in recruiting veterans, which we
16 had not been particularly successful, and we also
17 had Mark Geist was not yet on the board but doing
18 speeches for us. And so we had that combination
19 that we never had before. So I did recommend this.
20 I don't know anything happened with it, but I did
21 recommend it.
22 Q. And the -- the people that you're sending
23 this to describe -- describe what Oliver North's
24 role is. Richard Childress, what's his role at the
25 NRA?

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1 A. At the point I sent it Colonel North was
2 in the -- was in the process of becoming president,
3 Richard Childress was first vice president, and
4 Carolyn Meadows was second vice president. Pete
5 Brownell was just past president but made it clear
6 that he wanted to continue to stay involved. It's
7 just that he could no longer be visible as
8 president. Nick Perrine is the staff for the
9 president's office. Tom Kilgannon was the head of
10 Freedom Alliance, and Calvin Coolidge was the No. 2
11 person there. And Mr. Tavangar himself had always
12 had an interest from a PR perspective of how to
13 recruit -- how to be more effective at recruiting
14 veterans.
15 Q. And Wayne LaPierre is not included in this
16 list. Did you send this message to him somehow?
17 A. I -- I don't remember this specifically,
18 but I probably showed it to him first and he said,
19 well, get it out to people and see what they say.
20 Q. Okay.
21 A. I don't remember specifically.
22 Q. In your -- as a practice, then, would you
23 print it out and hand it to him before you would
24 send it out?
25 A. For the John Carter things, yes, but I --

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1 I also think that John Carter had such a volume of
2 stuff and he is an Acker- -- he is a Mercury Group
3 employee, Ackerman McQueen. I actually think that
4 Andra Fischer might have printed out a stack for
5 Wayne for every day, and if there was one
6 particular thing I would want him to see, let's say
7 this, I would say did you read that in your pack.
8 And if he didn't I might print it out for him.
9 Q. When you say Andra Fischer would print out
10 a stack of things, are you talking about press
11 reports?
12 A. I'm trying to -- yes. What John Carter
13 would send to a -- the officials would be every
14 press clipping that he thought was relevant to the
15 Second Amendment or the NRA.
16 Q. And this is nationwide press?
17 A. Nationwide or particularly when we were
18 active with the United Nations it could be
19 international.
20 MR. DICKIESON: Okay. Let's have marked
21 as the next exhibit an e-mail from Millie Hallow to
22 John Carter dated July 18th, 2018.
23 (Hallow Exhibit 11 was marked
24 for identification.)
25 BY MR. DICKIESON:

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1 Q. This is a very short e-mail from you to
2 John Carter that we were just talking about who one
3 of his roles is collecting news. In your e-mail
4 for the record I'll read the subject is "Just now."
5 The substance says "Jennifer Griffin on Fox News
6 just did a long spot on Butina. Can you find and
7 send?"
8 Who is Butina?
9 A. That would be Maria Butina.
10 Q. And who is she?
11 A. She was head of a Russian group called
12 Right To Bear Arms and had interaction with the
13 NRA.
14 Q. What was your interest in her on July 18,
15 2018?
16 MR. CHAMBERS: Objection, form.
17 A. I don't remember specifically this, but
18 I -- but I would guess that during the day that
19 somebody said, hey, she was just on, get it and
20 make sure that Wayne sees it or something to that
21 effect, because I wanted to make sure that it got
22 into the next packet. Someone called me I'm sure.
23 Q. What do you mean by "the next packet"?
24 A. The next thing that -- that John Carter
25 would send out because he tended -- he tended -- it

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1 was -- sometimes he didn't do the news stuff, it
2 tended to be print. I want -- so I don't remember
3 this one, but people would call me and I'd say make
4 sure -- I'd call him right away or text him or
5 e-mail him and say this just happened, can you make
6 sure that gets in.
7 Q. When you say "the news stuff," just print,
8 you're referring to the news stuff being TV
9 articles -- video articles as opposed to print?
10 A. When you go on the Fox News Website there
11 are articles, but sometimes -- but there's also
12 video, and I wanted to make sure -- I mean,
13 Jennifer Griffin is a -- she's video, she wouldn't
14 be writing. I just wanted to make sure he didn't
15 miss that.
16 Q. Okay. And did this refer to the NRA in
17 this article, to your knowledge?
18 A. I don't remember.
19 Q. We discussed briefly Pete Brownell's issue
20 with Russia and his trip to Russia. Was Ms. Butina
21 involved in that trip?
22 MR. CHAMBERS: Objection, form.
23 A. As -- as -- as far as I know, she was the
24 main person with whom they interacted to schedule
25 the trip, but --

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1 Q. Okay.
2 A. -- as far as I know.
3 Q. But you did not go on this trip to
4 Russia?
5 A. I did not.
6 Q. Okay.
7 Was the NRA -- was the trip to Russia an
8 NRA-sponsored trip?
9 MR. COLLINS: I'm just going to object for
10 purposes of I think this is way afar from anything
11 involved in the Virginia actions. So I'm just not
12 sure where we're going with it.
13 MR. DICKIESON: That's not an objection.
14 MR. COLLINS: It is an objection. I
15 object to you getting into this inquiry. I didn't
16 instruct her not to answer, but the objection is
17 we're getting somewhere that is nothing to do with
18 the lawsuits.
19 MR. CHAMBERS: We'll share the objection,
20 and I'll object to the form for the record.
21 A. Wayne LaPierre made it clear to a number
22 of people that he thought the trip was not
23 advisable, and when planning continued for it he
24 wanted to make sure that it was not an NRA official
25 trip.

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1 Q. Did he make that point clear to you?
2 A. Yes.
3 Q. What did he say exactly?
4 A. I want to make sure that there are no NRA
5 expenses for this trip.
6 Q. Was that before the trip?
7 A. Before and after.
8 Q. And that was made crystal clear to you; is
9 that right?
10 MR. CHAMBERS: Objection, form.
11 A. I remember it that way.
12 Q. Okay.
13 When was the trip to Russia?
14 A. I believe December 2015, but I am not
15 sure.
16 Q. Okay.
17 A. I just -- I don't have a lot of clarity.
18 Q. Were there people other than NRA
19 affiliated people --
20 MR. CHAMBERS: I apologize.
21 THE WITNESS: I just --
22 MR. CHAMBERS: Okay. Can we go off the
23 record for a moment?
24 MR. DICKIESON: Sure.
25 MR. COLLINS: Why don't we take a minute.

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1 MR. CHAMBERS: Are we off?
2 THE REPORTER: We need to go off.
3 THE VIDEOGRAPHER: All right. We're going
4 off the record at 1:56 p.m.
5 (A short break was had.)
6 THE VIDEOGRAPHER: We're going back on the
7 record at 2:11 p.m. This is the beginning of media
8 unit No. 4 in the deposition of Millie Hallow.
9 BY MR. DICKIESON:
10 Q. Right before we went on break my question
11 is were there other people that traveled on this
12 trip to Russia apart from people affiliated with
13 the NRA?
14 A. What does "affiliated" mean?
15 Q. Employee, director.
16 A. Other than -- number one, I never saw a
17 complete list of who were the attendees. I did not
18 staff or prepare for it in any way. And, two, to
19 my knowledge, Mr. Keene and Mr. Brownell were the
20 only board members and -- is that right -- were the
21 only board members and the rest were high donors
22 who were either being cultivated or had already
23 contributed, but I'm not sure. Okay?
24 Q. Okay.
25 A. I would like to correct that. With the

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1 exception of Sheriff Clarke who was recruited late
2 for I guess visibility and celebrity-ness.
3 Q. This is the famous Sheriff Clarke of
4 Milwaukee?
5 A. That would be correct.
6 Q. Who recruited him?
7 MR. CHAMBERS: Foundation -- objection,
8 foundation.
9 A. My understanding is that Mr. Keene had a
10 relationship with him and thought it was a good
11 idea.
12 Q. Who is Mr. Keene?
13 A. David Keene is a current board member of
14 the NRA and a past president of the NRA.
15 Q. Did the NRA pay any portion of the
16 expenses for this trip?
17 A. NRA did not want to pay any expenses for
18 the Russia trip.
19 Q. They may not have wanted to, but did they?
20 A. In the final analysis my understanding is
21 they did not.
22 Q. Did they make a payment that was then
23 reimbursed?
24 MR. CHAMBERS: Objection, foundation.
25 A. It's in -- I'm not quite sure how it all

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1 played out. That might have been the case. I
2 would like to also say that during this whole
3 period of time I was in chemotherapy and radiation,
4 just recovering from breast cancer, and I -- so
5 both in terms of time frame and my -- what I was
6 doing and also in terms of the after effects of the
7 chemo -- and I'm still on oral chemo to this day --
8 both in work and personal some things just get
9 fogged in my brain.
10 Q. Are you able to provide truthful testimony
11 today with your current medical condition and the
12 medication you're on?
13 A. Absolutely.
14 Q. And if you can't remember something,
15 you've been able to tell us that you don't
16 remember. So...
17 A. Exactly.
18 Q. Did you approve any expenses from the
19 Moscow trip or the Russia trip?
20 A. It was -- it was more complicated than
21 that.
22 Q. Tell us what the circumstances were.
23 A. Mr. -- Mr. LaPierre was very clear that he
24 didn't want NRA to -- to be responsible for any of
25 these -- any things relating to Moscow. He

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1 recruited Sheriff Clarke and by the time I went to
2 see Nick Perrine, who was the staff for the
3 president's office, he had already booked Sheriff
4 Clarke and Sheriff Clarke's wife on the NRA travel
5 Website. So that had to -- that was an item that
6 had to be extracted so that NRA was ultimately not
7 respond -- responsible through some reimbursement
8 form or some way. And then that was before the
9 trip.

10 After the trip -- and I'm -- I'm hazy on
11 the timing. After the trip there was a guy --
12 another guy that was added on at the last minute
13 and I can't remember his name, and -- and then it
14 turned out that Butina started letting people know
15 that her budget only allowed for X number of people
16 and this guy wasn't in her budget and that -- and
17 she started appealing to I believe it was
18 Mr. Brownell originally to pay.

19 There were a series of -- I think Pete
20 originally said -- Mr. Brownell said I can take
21 care of those so that NRA doesn't -- isn't
22 responsible. He was going to be president within
23 the next six months and he -- we needed to make
24 sure he was okay. That is the feeling I had at the
25 time.

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1 And then at some point he said no, I can't
2 do that, and that's when it all got kind of messed
3 up. I think that my efforts to fix it were
4 somewhat clumsy, but in the final analysis when I
5 wasn't involved anymore I understand that
6 Mr. Brownell did pay. But I -- I only know that
7 because I was told that.

8 MR. DICKIESON: Let's have marked as the
9 next exhibit, which is Exhibit 11 --

10 THE REPORTER: 12.

11 MR. DICKIESON: -- 12 e-mails from Millie
12 Hallow to Nicholas Perrine and Lisa Supernaugh
13 dated May 26, 2016.
14 (Hallow Exhibit 12 was marked
15 for identification.)

16 BY MR. DICKIESON:

17 Q. My question is is this the e-mail that you
18 wrote to Nicholas Perrine and Lisa Supernaugh about
19 the payment for the Russia trip?

20 A. I have two things.

21 Q. Oh. You can hand back --

22 A. Is one just a copy?

23 Q. That may have been a second copy there.

24 A. One is marked 12. Is that the same thing?

25 Q. Yes, the one that's marked 12.

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1 Is this the e-mail that you wrote on the
2 payments for the Russia trip?

3 A. I think so.

4 Q. And for the record, you wrote "Lisa" --
5 meaning Lisa Supernaugh -- "Wayne approved these
6 special projects involving outreach that Brownell
7 has done."

8 Who is the Wayne that's referred to in
9 that sentence?

10 A. That would be Wayne LaPierre.

11 Q. And Brownell is Pete Brownell who went on
12 the trip?

13 A. That's correct.

14 Q. And do you see attached as the third page
15 of this is an NRA -- is an invoice from Brownell
16 that has two line items, "NRA special project,
17 15,535.10" and an "NRA special project, \$6,000"?
18 Did you talk to Mr. LaPierre before you wrote this
19 e-mail?

20 A. I -- I do not remember, but I -- I would
21 not normally not have. But I don't remember
22 specifically this one.

23 Q. And this is after the -- the trip took
24 place; is that right?

25 A. Well after and -- well after, and I

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1 believe Mr. Brownell is then -- if it's in May is
2 now president and...

3 Q. Okay. And so recognizing that you're
4 under oath, is this a true statement that Wayne
5 approved these special projects involving outreach
6 that Brownell has done?

7 MR. CHAMBERS: Objection, form.

8 A. I do not remember this specific document.
9 I am not in the habit of not informing Wayne, but I
10 don't remember this specific document.

11 Q. Is it your testimony that this is a true
12 statement or a false statement?

13 MR. CHAMBERS: Objection, vague. Can you
14 point to the statement you're talking about,
15 Counsel.

16 MR. DICKIESON: That Wayne approved these
17 special projects involving outreach that Brownell
18 has done.

19 A. I have no specific memory of this.

20 Q. Okay. Do you know if subsequent to you
21 sending this message that the invoice was paid, the
22 Brownell invoice?

23 A. I know that Woody Phillips, the treasurer
24 at the time, told me I did this the -- not the
25 right way. And I said what do I need to do to fix

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1 it, and he said let it stand, we'll take care of
2 it.
3 So as to your specific question, I think
4 it did, but I don't know. This is after -- this is
5 a result of Mr. Brownell having said he would pay
6 and did pay, then saying I can't pay it turns out.
7 And I think this is related to that, but I'm kind
8 of confused about it because there was some back
9 and forth. And it's after he was president, which
10 I don't recall this dribbling over. So I'm not
11 sure.
12 Q. Were you questioned by any government
13 investigators about this project and your e-mail?
14 A. I don't think so, but I don't remember.
15 I've only been questioned by one and I don't
16 think --
17 Q. Who questioned you about it?
18 MR. CHAMBERS: Well, objection. That's
19 not what she said. She said she remembers being
20 questioned by one government investigator, not that
21 she remembers being questioned about this.
22 MR. DICKIESON: Oh, okay.
23 BY MR. DICKIESON:
24 Q. Who questioned you that you're referring
25 to?

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1 A. Somebody in the State Attorney General's
2 office, I believe.
3 Q. And what did they question you about?
4 A. I don't remember anymore, but I think it
5 was related to the case against NRA. I don't
6 remember this coming up.
7 Q. Do you remember any topics that came up in
8 that conversation?
9 MR. CHAMBERS: Objection.
10 A. I -- I could be reminded, but just off the
11 top of my head, the only thing I can remember is
12 that he seemed incredulous that Wayne didn't do
13 e-mail and I don't remember anything else.
14 Mr. LaPierre.
15 Q. And when did this questioning take place?
16 A. My -- my lawyers would remember. I don't
17 remember when.
18 Q. Are these the same lawyers that are here
19 today?
20 A. Yes.
21 Q. And when did you first retain them?
22 A. I don't --
23 MR. CHAMBERS: I'm sorry, Counsel. Can
24 you repeat the question.
25 MR. DICKIESON: When did you first retain

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1 these lawyers?
2 A. I don't remember.
3 Q. Was it in 2018?
4 MR. CHAMBERS: Asked and answered.
5 A. I don't remember.
6 Q. You can't narrow it down to any year?
7 MR. CHAMBERS: Objection, asked and
8 answered.
9 A. I'm not sure.
10 Q. Okay.
11 A. I'm just not.
12 Q. Where did the interview -- was it an FBI
13 agent that questioned you?
14 MR. CHAMBERS: Objection. Can we go off
15 the record briefly?
16 MR. DICKIESON: Sure.
17 THE VIDEOGRAPHER: We're going off the
18 record at 2:26 p.m.
19 (A short break was had.)
20 THE VIDEOGRAPHER: We're going back on the
21 record at 2:32 p.m.
22 BY MR. DICKIESON:
23 Q. Okay. Before we went off the record I
24 want to get some details about the interview, I'll
25 call it, with the government investigator. It's

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1 your understanding this was someone involving the
2 New York Attorney General's office investigation;
3 is that correct?
4 MR. CHAMBERS: Objection.
5 MR. COLLINS: Objection. You can answer
6 that yes or no and just the highlights. We're not
7 going to allow her to answer any questions about
8 questions she received from the New York -- the
9 office of the New York Attorney General.
10 MR. DICKIESON: On what basis?
11 MR. COLLINS: Investigatory privileges,
12 attorney-client privileges, and so forth.
13 MR. DICKIESON: Well, the NRA is not the
14 investigating party here.
15 MR. COLLINS: No, it's not, absolutely
16 not, but, again, it's being investigated and it's
17 having one of its employees being interviewed and
18 we believe that is subject to attorney-client
19 privilege. So but --
20 MR. DICKIESON: All right.
21 MR. COLLINS: -- you know -- I understand
22 you may disagree.
23 MR. DICKIESON: Okay.
24 BY MR. DICKIESON:
25 Q. So when was the meeting -- the interview?

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1 MR. CHAMBERS: Objection.
2 MR. COLLINS: You can say when, but
3 otherwise not anymore.
4 A. I am not sure. October or November, but
5 I'm not sure.
6 Q. Of 2019?
7 A. Yes.
8 Q. Where was the interview?
9 MR. CHAMBERS: Objection.
10 MR. COLLINS: Say where. We're just not
11 getting into substance.
12 A. It was at Latham & Watkins.
13 Q. Who was present?
14 MR. CHAMBERS: Objection.
15 MR. COLLINS: I guess it doesn't really
16 matter who was present. So we're instructing her
17 not to answer.
18 MR. DICKIESON: On a relevance basis?
19 MR. COLLINS: No. Just as far as since
20 we're not going to allow her talk about any
21 substance, we're not going to let her answer that
22 question because it's -- we're not going to let her
23 answer about substance. There's no reason to find
24 out who was there.
25 MR. CHAMBERS: And, Counsel, on a second

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1 ground I'm going to instruct Ms. Hallow not to
2 answer because she very well may not be at liberty
3 to discuss it.
4 MR. DICKIESON: On what authority?
5 MR. CHAMBERS: Well, an ongoing
6 investigation. It's not clear that Ms. Hallow is
7 at liberty to discuss that investigation, the
8 substance or the details.
9 MR. GONZALEZ: Has she been instructed not
10 to?
11 MR. CHAMBERS: I'm not going to share that
12 with you.
13 MR. GONZALEZ: Well, that would be helpful
14 because we'll stop if that's --
15 MR. CHAMBERS: I would hope -- I mean, you
16 can continue, but I'm instructing her not to answer
17 on the grounds that she may not be at liberty to
18 discuss it.
19 MR. DICKIESON: So I'll ask her that
20 question under oath and she can answer that.
21 BY MR. DICKIESON:
22 Q. Were you instructed not to discuss the
23 interview with any other person?
24 A. Yes, I was.
25 Q. By whom?

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1 MR. CHAMBERS: Objection.
2 MR. DICKIESON: By the government
3 investigators or by your own attorneys?
4 A. In -- in that room.
5 Q. But who -- who told you not to discuss
6 with anyone?
7 MR. CHAMBERS: Objection. I'm going to
8 instruct you not to answer.
9 BY MR. DICKIESON:
10 Q. Okay. Have you been contacted by any
11 other federal investigator?
12 A. I have not.
13 Q. Okay.
14 A. I have not.
15 Q. Okay. You paused. Was there something
16 you were thinking about that --
17 MR. CHAMBERS: Objection, form.
18 A. It was -- my mind is clear. I was
19 thinking of something else and it's not -- wasn't
20 that.
21 Q. Okay.
22 A. I'm sorry.
23 Q. Have you discussed Ackerman McQueen with
24 any government investigators?
25 MR. CHAMBERS: Objection. She can answer

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1 to the exclusion of her conversation with the
2 New York Attorney General's office.
3 A. I have not.
4 (Hallow Exhibit 13 was marked
5 for identification.)
6 BY MR. DICKIESON:
7 Q. Going back to Exhibit 12, the e-mail that
8 you sent to Nicholas Perrine and Lisa Supernaugh,
9 that e-mail was attached to a New York Times
10 article that we'll have marked as Exhibit 13, and
11 my question is have you seen this article before?
12 A. I read it at the time it came out.
13 Q. And it's dated September 26, 2019; is that
14 right?
15 A. It's dated that.
16 Q. And it's -- the author is Danny Hakim. Do
17 you know Danny Hakim?
18 A. I do not.
19 Q. Have you ever had any discussions with
20 him?
21 A. I have never.
22 Q. Have you ever talked to anyone at the New
23 York Times?
24 MR. CHAMBERS: Objection, form.
25 A. Not in the last 20 years.

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1 Q. Okay.
2 Let's go to the second page of this
3 article.
4 A. Could I just refresh and read the
5 article --
6 Q. Sure. Take your time.
7 A. -- because I...
8 (Witness reviewing document.)
9 A. Yes, sir.
10 Q. So on the second page of this article at
11 the top of the page it reads "The 2016 transactions
12 were overseen by Millie Hallow, an aide to
13 Mr. LaPierre, according to e-mails. In one
14 February 2016 e-mail Ms. Butina sent an invoice
15 directly to Ms. Hallow for 'hosting an NRA
16 leadership group for six days in Moscow,' according
17 to the document, and thanked her 'for your
18 invaluable advice these past few months.'"
19 Is that a true statement?
20 A. I have --
21 MR. COLLINS: I apologize. I'm going to
22 object again because I just don't see where we're
23 going with this. I don't see any claim or defense
24 by the NRA, any claim or defense by Mercury Group,
25 Inc. or Ackerman McQueen, Inc. in the Virginia

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1 actions that this has anything to do with those
2 actions. So...
3 MR. DICKIESON: Is that -- is that
4 paragraph a true statement?
5 MR. CHAMBERS: Counsel, could you just
6 specify which portion of the paragraph you're
7 asking for Ms. Hallow to verify?
8 MR. DICKIESON: We'll break it down.
9 MR. CHAMBERS: Thanks.
10 BY MR. DICKIESON:
11 Q. Did you oversee the 2016 transactions
12 involving the Russia trip?
13 A. If it has -- if by that it's the Brownell
14 stuff, I -- I tried to, but I was not very good at
15 it.
16 Q. Did you also receive an invoice from
17 Ms. Butina for hosting an NRA leadership group for
18 six days in Moscow?
19 A. If this is the -- no. I think -- I think
20 what I have seen is an invoice that my lawyer
21 showed me that really was to Mr. Brownell who
22 forwarded it to me and it was for that last person
23 in to the trip that she hadn't budgeted for.
24 That's my recollection, but I'm not sure.
25 MR. CHAMBERS: Just for the record, by

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1 reference to attorney Ms. Hallow is not intending
2 to waive any privileges.
3 MR. DICKIESON: Understood.
4 BY MR. DICKIESON:
5 Q. Did you receive a note from Ms. Butina
6 thanking you for -- "for your invaluable advice
7 these past few months"?
8 A. I don't remember that quote, and I did not
9 give her valuable or invaluable advice.
10 Q. Did you ever meet Ms. Butina?
11 A. I met her on the first -- I assume was the
12 first time she had been invited to an NRA annual
13 meeting, but I never shared a meal or a drink or
14 had a one-on-one conversation with her.
15 Q. And were you ever contacted by the
16 prosecutors of Ms. Butina?
17 A. No, I was not.
18 Q. In the next paragraph on that second page
19 it states in this New York Times article "In a
20 May 26th e-mail that year Ms. Hallow told other NRA
21 officials that an invoice related to the trip
22 submitted by Mr. Brownell's company, the firearms
23 retailer Brownells, had been authorized. 'Wayne
24 approved these special projects involving outreach
25 that Brownell has done,' she wrote."

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1 That's referring to the e-mail that we've
2 just been going over, right?
3 A. This e-mail.
4 Q. Right.
5 How did the New York Times obtain that
6 e-mail?
7 MR. CHAMBERS: Objection, foundation.
8 A. I have no idea.
9 Q. So if you look at Exhibit 12, it's from
10 you to Nicholas Perrine and Lisa Supernaugh and no
11 known copies were given out. You didn't -- did you
12 leak this e-mail?
13 MR. CHAMBERS: Objection -- objection to
14 the form of the question.
15 MR. DICKIESON: Did you leak this e-mail?
16 A. I did not leak anything, this e-mail or
17 anything.
18 THE REPORTER: Please keep your voice up.
19 THE WITNESS: I'm sorry.
20 THE REPORTER: It's okay.
21 BY MR. DICKIESON:
22 Q. Did you discuss with Nicholas Perrine
23 whether or not he leaked the e-mail?
24 A. Nick and I have made a point to not
25 discuss any of this with each other.

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1 Q. And when did you make that agreement?
2 A. A long time ago. We just knew it was
3 better to not so that our -- we could say that we
4 hadn't talked to each other. I don't -- I don't
5 remember a time frame.
6 Q. Okay. What about did you have any
7 discussions with Lisa Supernaugh about this e-mail?
8 A. No, I have not.
9 Q. Do you know if you had discussions with
10 other persons -- without saying what those
11 discussions were, but just did you have discussions
12 with other persons about who may have leaked this
13 e-mail?
14 A. Not who may have leaked, but Woody
15 Phillips, the treasurer at the time, told me I had
16 done it the wrong way. So he knew about this
17 e-mail.
18 Q. Did he tell you that he learned about it
19 from Lisa Supernaugh, who worked for him?
20 A. I don't know whether it was that way or
21 whether I, in fact, discussed it with Woody. I
22 just -- I don't have a memory of it.
23 Q. What was your health as of May of 2016?
24 A. The annual meeting was in April. I was
25 physically able to carry out my duties. I didn't

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1 have the stamina that I had, but I felt grateful to
2 be okay, continuing the medicine. I was no longer
3 in either infusion chemotherapy or radiation, but I
4 was still taking oral chemotherapy. And my other
5 chemotherapy is now once every three months. That
6 first year might have been more often. I don't
7 remember
8 Q. All right.
9 Let's go back to the second page of the
10 article. The next paragraph states "On Thursday
11 Josh Powell, the NRA's chief of staff, said in a
12 statement that 'in order to facilitate the transfer
13 of funds to Brownell, Millie falsely stated that
14 Wayne approved of certain expenses when he had not.
15 In fact, Millie apologized to me and others later
16 for the misrepresentation."
17 Is that a true statement?
18 MR. CHAMBERS: Objection, form. Counsel,
19 will you break that down as well?
20 BY MR. DICKIESON:
21 Q. Okay. Did you have a discussion with Josh
22 Powell about your e-mail?
23 A. I didn't have a discussion with Josh
24 per se, but when this was getting all messed up, I
25 did apologize to Josh and Lisa that I had done this

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1 wrong to begin with.
2 Q. What did you say to them?
3 A. I said I'm sorry I did this the wrong way.
4 Q. And what did you mean by "the wrong way"?
5 A. Mr. Phillips said that, one, I should not
6 have called it special projects, that it should
7 have been clearer, and that when it turned out that
8 Mr. Brownell wanted to be reimbursed for what I
9 thought he was making clear that I should have come
10 to him and talked to him about it. Instead I
11 carried on.
12 Q. Did you talk to Wayne LaPierre about your
13 e-mail?
14 A. And that's what I can't remember. I know
15 I talked to Woody. I don't think I would have
16 normally deliberately not talked to him, but I
17 cannot remember with any specificity that I did
18 given that my overriding charge from him was to
19 clean up all these Russia things and make sure that
20 the NRA wasn't going to pay for a trip that he did
21 not want to pay for, the Association to pay for.
22 Q. Did you apologize to Wayne LaPierre for
23 misrepresenting his position?
24 A. I don't remember. I -- I don't remember.
25 Q. As you sit here today, is it your

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1 testimony that -- your statement that Wayne
2 approved the payment of that special project is a
3 false statement?
4 MR. COLLINS: Objection to the form.
5 A. Say it again.
6 Q. As you sit here today, is it your sworn
7 testimony that Wayne LaPierre did not approve the
8 payment of the special projects?
9 MR. CHAMBERS: Objection, asked and
10 answered, form.
11 A. I do not remember specifically whether I
12 talked to him about this invoice.
13 Q. But you -- you ended up taking the blame
14 for it; is that correct?
15 MR. CHAMBERS: Objection, vague. What's
16 the "it," Counsel?
17 MR. DICKIESON: The blame for the false --
18 for approving the payment, saying that Wayne had
19 approved it.
20 MR. CHAMBERS: Objection, form.
21 A. I do not know if he didn't. I don't
22 remember. That is my problem.
23 Q. Did you tell Woody Phillips that you had,
24 in fact, misrepresented Wayne LaPierre's position?
25 A. My recollection of my conversation with

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1 Woody had more to do with how. I don't know -- and
2 that's interesting. I don't know. I don't -- I
3 don't know.
4 Q. Were you disciplined in any way for the
5 e-mail where you said Wayne approved the payment?
6 A. From Mr. Phillips as to form of how I was
7 trying to do it.
8 Q. He reprimanded you?
9 A. Yes.
10 Q. But you didn't -- you weren't suspended or
11 suffer any pay loss or anything like that; is that
12 right?
13 A. No, but I -- no, but oversight was more
14 stringent generally.
15 MR. CHAMBERS: If I can, Counsel, just to
16 clarify her last answer. I think she's saying no,
17 she was not subject to any discipline, reduction in
18 pay, or anything like that. Is that correct,
19 Millie?
20 THE WITNESS: That is correct.
21 BY MR. DICKIESON:
22 Q. Have you subsequently received a pay raise
23 from the NRA?
24 A. Since this period?
25 Q. Yes.

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1 A. I don't think so. I -- I think I'm at the
2 level that I am now and have been there -- well,
3 this is 2016. 2016. I don't -- I don't think so,
4 but I'm not sure when -- I think, I believe that
5 I've been at this salary level for four or five
6 years, but I'm not sure.
7 Q. What is your current salary?
8 A. \$250,000.
9 Q. Are there bonuses that work into that on
10 an annual basis?
11 A. No, no automatic cost of living or
12 anything like that.
13 Q. Who else -- is there anyone else who had
14 access to your e-mail account?
15 MR. CHAMBERS: Objection, foundation.
16 MR. DICKIESON: Your NRA e-mail account, I
17 should say.
18 A. It's -- NRAHQ is owned by NRA and NRA --
19 anybody authorized by the NRA is -- can look at any
20 employee's e-mails.
21 Q. And are you aware that that, in fact,
22 occurs, that someone is looking at all your
23 e-mails?
24 A. I don't know that.
25 Q. Have you been told that the Brewer law

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1 firm is screening e-mails?
2 A. I have not been told that.
3 Q. Have you been told that anyone is
4 screening e-mails at the NRA?
5 A. I have not been told that.
6 Q. But you know that as a policy that it
7 could happen; is that right?
8 A. Yes. Yes, and employees know that.
9 Q. Tell me about Wayne LaPierre's policies on
10 confidentiality. Is he particularly attuned to
11 secrecy?
12 MR. CHAMBERS: Objection, form.
13 A. I don't know what "attuned to secrecy"
14 means.
15 Q. Does he -- does he tell people outside of
16 a small circle where he's traveling before he
17 travels there?
18 MR. CHAMBERS: Objection, form -- sorry.
19 Objection, foundation.
20 A. It is -- has been true since Sandy Hook
21 that his travel schedule, one, is not written as
22 recommended by NRA security and is known to very
23 few people.
24 Q. Are you one of those people that would
25 know about his travel plans?

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1 A. Not comprehensively. If he needs to be --
2 if he knows that something that I might need to
3 reach him he would tell me, but if he doesn't want
4 to hear from me, I won't know. I won't know and I
5 don't ask. It's totally up to him.
6 Q. And I think you testified earlier that you
7 have traveled with him; is that correct?
8 A. For work, yes.
9 Q. Do you then travel on private jets with
10 him?
11 A. I have on occasion. The period of time
12 where security recommended more private travel
13 pretty much coincided with the time that I was not
14 well, and I do less travel with Mr. LaPierre than I
15 did five or six years ago and those -- the majority
16 if I look at that period, that period was mostly
17 commercial.
18 Q. That was before Sandy Hook?
19 A. That was before Sandy Hook.
20 Q. Who handles Mr. LaPierre's travel
21 arrangements?
22 MR. CHAMBERS: Objection, foundation.
23 A. The -- his flight travel and ground
24 travel?
25 Q. Yes.

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1 A. Local it would be Mercury Group usually
2 through Nader. For outside, the air
3 transportation, it would be a woman named Gayle
4 Stanford or Sanford. I always get it wrong.
5 Q. Stanford.
6 A. Stanford.
7 Q. And how long has he worked with Gayle
8 Stanford?
9 A. I first heard of Gayle -- my recollection
10 is that she was -- she was previously doing some
11 travel scheduling for Angus McQueen, and when Wayne
12 did his first book -- Wayne LaPierre did his first
13 book tour that I was involved in that summer I had
14 the impression that that's what she first began to
15 do -- she did all the travel for Mr. LaPierre,
16 Mr. Schropp, and Ms. Simone and did the car rentals
17 and all of that. That is -- I have the impression
18 that that was her first intensive stuff with
19 Mr. LaPierre.
20 Q. And do you work with Gayle Stanford to
21 coordinate the details of his travel, letting her
22 know where he needs to be at certain times?
23 A. If it is an event that -- where the event
24 itself where I have been involved in and I know the
25 schedule, he could say to Ms. Stanford Millie knows

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1 all the details, let her tell you what time I need
2 to arrive and what room it's in. If I'm traveling
3 with him, then -- then the same thing.
4 But if it's something that I'm not
5 involved in, increasingly Wayne's travel person was
6 Nader Tavangar and Ms. Stanford would deal directly
7 with him and the security person that Wayne now has
8 to have with him at all times.
9 Q. Who is that security person?
10 A. His name is Chris Kinney, K-I-N-N-E-Y.
11 Q. And is he the person who recommended that
12 Mr. LaPierre use private jets?
13 MR. CHAMBERS: Objection, foundation.
14 A. That recommendation came not from Wayne's
15 personal security, but our -- our NRA security body
16 which interacts with local and federal threat-type
17 people.
18 Q. And who is the person in charge of that?
19 A. His name is Jim Staples, S-T-A-P-L-E-S.
20 Q. So how many times have you flown on a
21 private jet through the NRA?
22 A. In 2019, once.
23 Q. How about prior years?
24 A. Just not very often because I wasn't
25 traveling much. So -- and then prior to Sandy Hook

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1 we mostly took commercials. So I would say if I
2 were to count all of the times through my whole
3 history, five or six and always with a bunch of
4 other people, not just me, where he was going
5 somewhere and everybody that could would go at the
6 same time.
7 Q. Has your husband ever flown on the NRA
8 private jet?
9 A. He might have once where an event -- I
10 seem to recall an event that we all had to go to
11 and it turned out that my husband was a speaker at
12 the same program, Wayne was the keynoter. So he
13 did get on a plane, but I can only remember that
14 one time.
15 Q. Okay. Did you ever reimburse the NRA for
16 your travel or your husband's travel for private
17 jet travel?
18 A. Did not. Did not know that that was the
19 thing that we ought to do.
20 Q. Have you used Gayle Stanford for your own
21 personal travel?
22 A. In the beginning whenever I traveled with
23 Wayne she would book me as well, and then policies
24 tightened so that Wayne was the only one that could
25 use Gayle Stanford and the rest us had to book the

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1 same -- mirroring the same flights through MacNair,
2 the in-house agency of -- travel agency, in-house
3 travel agency.
4 Q. If I understand correctly, Mr. LaPierre
5 would book his private jet travel --
6 A. No, not private.
7 Q. Oh, not private jet?
8 A. Not private. I'm just talking about
9 commercial.
10 Q. Okay. So does Mr. LaPierre fly commercial
11 now?
12 A. I -- I think there have been occasions
13 where he did.
14 Q. But for the most part --
15 A. But I -- but I -- I don't know, but I
16 think there are occasions that he has.
17 Q. Do you help schedule Mr. LaPierre's
18 travel?
19 MR. CHAMBERS: Objection, form.
20 A. I don't. I am -- I am more at the event.
21 Wayne will be in the building at 2:00 and this is
22 where he goes, I tend to be that. I don't do much
23 with travel.
24 Q. So getting back to my question. Have you
25 ever used Ms. Stanford for your own personal,

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1 nonbusiness-related travel expenses?
2 MR. CHAMBERS: Objection, form.
3 A. Not -- not that I recall.
4 Q. How often would you deal with
5 Ms. Stanford?
6 MR. CHAMBERS: Objection, form.
7 A. I -- not -- not -- that first year that I
8 was the consultant I would talk to her on the phone
9 every day to make sure flights weren't late. I
10 never actually met her for two years. It was a
11 phone kind of conversation.
12 She lives in the Los Angeles area and I
13 would -- if I had business in the Los Angeles area
14 I would try to stop by and see her, but, again,
15 since the private travel and my nontraveling has
16 coincided I -- I probably haven't talked to her in
17 months. We don't -- so not often is the --
18 Q. Is it your understanding that she is a
19 travel agent?
20 A. Yes.
21 Q. Has your son traveled on Mr. LaPierre --
22 on a private jet chartered for Mr. LaPierre?
23 MR. CHAMBERS: Objection, foundation.
24 A. Not that I recall.
25 Q. Did Ms. Stanford arrange for travel

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1 accommodations at your son's wedding?
2 A. She -- she did make -- she did do the
3 arrangements for the buses from the wedding.
4 Q. And where was your son's wedding?
5 A. It was in -- north of Minnesota.
6 Q. And did the NRA pay for that arrangement?
7 A. The NRA --
8 MR. CHAMBERS: I'll object to foundation.
9 Go ahead.
10 A. Ms. Stanford -- what the e-mails show is
11 that there was a bill and Lisa told -- Supernaugh
12 told me it needed to be reimbursed, and as far as I
13 know, that was done.
14 Q. My question was -- I'm not asking what the
15 e-mail showed -- did the NRA pay the Stanford
16 invoice for your son's wedding transportation?
17 A. I don't remember this, but I think -- I do
18 remember arranging it with Gayle. I do not have
19 any clarity where she and I discussed bill it to
20 the NRA and I'll reimburse, but that is what
21 happened. At -- that's what happened.
22 Q. What about other wedding expenses for your
23 son, were they paid through the NRA?
24 A. No.
25 Q. What about the fee for Mr. Erickson's

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1 wedding planning services?
2 MR. CHAMBERS: Objection, foundation.
3 A. There were no wedding planning services
4 from Mr. Erickson as far as I know. He attended
5 the wedding, but I know of no fees attached to
6 wedding planning services from him.
7 Q. And this -- so you didn't pay Mr. Erickson
8 anything for any services he provided for the
9 wedding; is that right?
10 A. That is correct.
11 Q. And is this the Mr. Erickson who is
12 Ms. Butina's boyfriend?
13 A. Yes.
14 Q. How do you know Mr. Erickson?
15 A. He has been in the conservative community
16 for a long time. He was Pat Buchanan's campaign
17 manager and he's someone that you run into at
18 various political and conservative events.
19 (Hallow Exhibit 14 was marked
20 for identification.)
21 BY MR. DICKIESON:
22 Q. Let's have marked as the next exhibit, 14,
23 an e-mail and attachments relating to your son's
24 wedding.
25 I want to direct your attention to the

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1 third page of this invoice for this handwritten
2 item No. 1 at the top that's an e-mail from you to
3 Lisa Supernaugh.
4 A. I don't remember any of this. Could I --
5 could I talk to -- could we take a break?
6 MR. DICKIESON: We can take a break.
7 MR. CHAMBERS: Okay. Thanks.
8 THE VIDEOGRAPHER: We're going off the
9 record at 3:11 p.m.
10 (A short break was had.)
11 THE VIDEOGRAPHER: We're going back on the
12 record at 3:34 p.m. This is the beginning of media
13 unit No. 5 in the deposition of Millie Hallow.
14 BY MR. DICKIESON:
15 Q. All right. Before we went on a break we
16 were looking at Exhibit 14, which is an e-mail from
17 Josh Powell to Anthony Makris dated the 2nd of
18 January 2018, and it includes an embedded e-mail
19 from Lisa Supernaugh to Josh Powell, subject line
20 "Notes and e-mail on invoices to discuss with W."
21 I directed your attention to the third
22 page of this, which is an e-mail from you, Millie
23 Hallow, to Lisa Supernaugh about NRA event invoice,
24 and my first question is, this is your son's
25 wedding is the Minnesota event; is that correct?

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1 A. I do not know. I've read this now several
2 times. No one has ever -- I don't know and I don't
3 remember. None of this rings a bell, and no one at
4 NRA, not Lisa, not Josh has talked to me about
5 this.
6 Q. Okay. So even after reading through this
7 and taking a long break, you don't think this
8 relates to your son's wedding?
9 MR. CHAMBERS: Objection, form.
10 A. I just don't know because I don't have a
11 memory of it.
12 Q. Okay.
13 Let me direct your attention to the -- I
14 guess it's the fifth page of the exhibit. It's
15 under item No. 2 is handwritten at the top. It's
16 an e-mail from Millie Hallow to Lisa Supernaugh and
17 Vanessa Shahidi.
18 A. Yes.
19 Q. And it has embedded in it an e-mail from
20 you to, looks like, Susan LaPierre, Christopher
21 Cox?
22 A. Uh-huh.
23 Q. And the subject is "Surely goodness." Is
24 it your testimony that that is not describing your
25 son's wedding?

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1 MR. CHAMBERS: ObjectionE, form.
2 A. That does look like it's a description of
3 the wedding. I -- I don't remember sending this,
4 but yes.
5 Q. Okay. And there's a reference to "Ian."
6 That's your son; is that right? "Ian's musician
7 friends came from all over."
8 A. Correct.
9 Q. And you're asking Susan and Christopher
10 Cox to share this with Wayne and Courtney. That's
11 Susan's husband, Wayne LaPierre, and Courtney is
12 Christopher Cox's wife; is that right?
13 A. Correct.
14 Q. And then embedded in that e-mail is a
15 message from Paul Erickson that includes you and
16 Ian Walters talking about his presence at the
17 wedding; is that right?
18 A. He attended the wedding. I don't
19 specifically remember this memo, but yes.
20 Q. Okay. Does this help refresh your
21 recollection that -- that these invoices and the
22 Paul Erickson invoice was for your son's wedding?
23 MR. CHAMBERS: Objection, form.
24 A. It does not. I -- it does not.
25 Q. Okay. Let's look at the Paul Erickson

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1 invoice. It's on page 4 of this exhibit. It says
2 "Client: Millie Hallow, National Rifle
3 Association," and it's addressed to your business
4 address at the NRA; is that right?
5 A. Yes, I see that.
6 Q. And it says the "Services rendered," it's
7 "Production services for August 2012, Minnesota
8 event, venue selection, staging, sound system,
9 tenting, catering, \$10,000"; do you see that?
10 A. I do see it.
11 Q. Was there some other Minnesota event that
12 he could be referring to, or is this your son's
13 wedding?
14 A. I don't know.
15 Q. Okay.
16 A. I -- I don't know. I -- I have no memory
17 of this.
18 Q. Okay. Do you remember Paul Erickson
19 helping out at your son's wedding?
20 A. I know he attended and was helpful, but I
21 don't remember anything beyond that.
22 Q. Okay.
23 Let's look at item 3. It's the third to
24 the last page of this exhibit and there is an
25 e-mail from Millie Hallow to Lisa Supernaugh,

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1 subject "Wedding." Do you remember sending this
2 e-mail to Lisa Supernaugh about a wedding?
3 MR. COLLINS: If I could get one minute,
4 ma'am. I'm going to object again. I don't see any
5 relevancy or relationship whatsoever between this
6 inquiry and the claims and defenses at issue in the
7 Virginia actions.
8 MR. DICKIESON: Did you send this e-mail
9 to Lisa Supernaugh?
10 A. I do remember transportation expenses from
11 Gayle and that I was to reimburse. I have that
12 memory.
13 Q. Okay. And the -- the one line in your
14 August 28, 2012 e-mail message to Lisa Supernaugh
15 says "Thanks," then "Can you remove all Elk River
16 references." Elk River is where your son's wedding
17 was, correct?
18 A. Yes. Where -- where is -- where is that?
19 Oh, I see it. Yes, I do.
20 Q. And if you look at the last page of this
21 exhibit, it's the --
22 A. Gayle Stanford itemization. GS2
23 Enterprises is her company; is that correct
24 A. I did not know that was the name of her
25 company.

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1 Q. But that's the address she works out of in
2 Woodland Hills; is that right?
3 MR. CHAMBERS: Objection, foundation.
4 A. I -- I do not know her address.
5 Q. Is this the invoice that you wanted Lisa
6 Supernaugh to remove the Elk River references in?
7 A. I -- I don't know because I don't remember
8 that. I do remember Gayle and transportation and
9 my reimbursing.
10 Q. Is it a normal practice for you to ask
11 that an invoice be altered in dealing with the NRA
12 treasurer's office?
13 A. No.
14 Q. But has it happened?
15 A. If -- if the level of specificity is too
16 broad or not broad enough, I have asked people to
17 re- -- I -- I don't know any circumstances, but I
18 have.
19 Q. Would you ask it to be changed in the
20 treasurer's office or would you go back to the
21 vendor and have them change it?
22 MR. CHAMBERS: Objection, form.
23 A. I -- I don't remember. I don't remember
24 and I -- I don't -- all I remember about the
25 transportation is that Gayle Stanford did do it and

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1 I was to reimburse.
2 Q. You were to reimburse the NRA?
3 A. Correct.
4 Q. So the NRA paid it initially; is that
5 right?
6 A. Correct.
7 Q. And did Wayne LaPierre authorize that the
8 NRA would pay it initially?
9 MR. CHAMBERS: Objection, foundation.
10 A. I do not have any memory of that.
11 Q. Do you have any memory as to anyone, Woody
12 Phillips, authorizing that the NRA would pay the
13 transportation expenses for your son's wedding in
14 advance?
15 A. I have no memory of that. I'm not saying
16 yes or no. I just don't have a memory of that.
17 I've read this now through several times.
18 Q. Look at the -- going back to the e-mail
19 that's item 3. Embedded in that first e-mail where
20 you --
21 A. Wait. What page? I'm sorry.
22 Q. Third-to-the-last page.
23 Embedded in the e-mail that says "Thanks,
24 can you removal all Elk River references," there's
25 a message from Lisa Supernaugh to you and embedded

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1 in that is a message from you that says "Please
2 tell me how you want me to tell Gayle to submit
3 this to you, not to me."
4 Do you recall writing that to anyone?
5 A. I do not. (Indecipherable). Have her
6 bill to me (inaudible). Sorry.
7 Q. Is it your testimony today --
8 MR. CHAMBERS: I'm sorry. I don't think
9 the witness has answered the question.
10 A. I'm -- I'm trying to go over sequences
11 here, and I just -- I just can't -- it doesn't -- I
12 can't remember how it actually went.
13 Q. Is it your testimony today under oath that
14 the NRA did not pay for your son's wedding or any
15 part of it?
16 MR. CHAMBERS: Objection, form.
17 A. I am saying I have no memory of any of
18 these things with the exception of transportation
19 and I do remember that, and -- and I am saying that
20 no one at the NRA ever discussed any of this with
21 me for me to -- it triggers no memory and...
22 Q. You don't recall any discussions with Lisa
23 Supernaugh about this?
24 A. None, nor Mr. Powell.
25 Q. If you go to the third page of the

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1 exhibit, item No. 1, that's an e-mail from you to
2 Lisa Supernaugh that states "Just hold, need to ask
3 W tomorrow if this is how he wants to handle. What
4 do you think?"
5 "W" refers to Wayne LaPierre; is that
6 correct?
7 A. It would.
8 Q. Do you recall discussing with Wayne
9 LaPierre whether or not the NRA invoice should be
10 handled by the NRA?
11 A. I don't -- I don't remember. I just have
12 no memory of it.
13 Q. Is -- has your e-mail address during your
14 entire tenure at the NRA mhallow@nrahq.org?
15 A. That is the NRA -- my NRA address which I
16 still use. I also have a Gmail account that sort
17 of -- that gets used as well.
18 Q. Okay. And you -- are you pretty careful
19 about using Gmail for personal business and NRA
20 e-mail for NRA business?
21 A. It gets -- it gets mixed up because board
22 members will send me something on the Gmail account
23 that's NRA related and then there's a whole
24 conversation that will be on Gmail. So it's -- it
25 gets mixed up.

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1 Q. So the cover e-mail starts out -- reading
2 from the bottom up, there's a message from Lisa
3 Supernaugh to Josh Powell. In 2017 -- which is
4 five years after the wedding; is that right?
5 A. Correct.
6 Q. Was there something going on in December
7 of 2017 to review your expenses or your financial
8 dealings?
9 MR. CHAMBERS: Objection, foundation.
10 A. Not to my knowledge. No one has ever
11 spoken to me about this.
12 Q. And that e-mail to Josh Powell was then
13 forwarded to Anthony Makris at Ackerman McQueen.
14 You know who Anthony Makris is, right?
15 A. I know who he is.
16 Q. Do you know why Josh Powell would be
17 talking with Anthony Makris about your wedding
18 expenses?
19 A. I have no --
20 MR. CHAMBERS: Objection, foundation. Go
21 ahead.
22 MR. COLLINS: Not her wedding expenses.
23 MR. DICKIESON: Your son's wedding
24 expenses.
25 A. I have no idea. Again, no one asked me.

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1 No one asked me.
2 Q. Are you aware of any review of your
3 personal expenses at the NRA during this time
4 period, 2017, 2018?
5 A. Not that they said to me -- that anyone
6 said to me.
7 Q. Were you ever charged with making in- --
8 inappropriate expenditures for NRA -- being billed
9 to the NRA?
10 MR. CHAMBERS: Objection, form. Counsel,
11 what do you mean by charged?
12 MR. DICKIESON: I'll rephrase it.
13 BY MR. DICKIESON:
14 Q. Did you ever make in- -- inappropriate
15 charges to the NRA for personal expenses?
16 A. In this period?
17 Q. This period, meaning from 2017 forward.
18 A. Not that I'm aware of. Not that I'm aware
19 of. Not that I recall. 2017.
20 Q. Let me -- let me ask more specifically.
21 Were you ever criticized or told to stop the
22 leasing of your car and billing that to the NRA?
23 A. I -- I don't have a leased car.
24 Q. Did you lease cars and bill them to the
25 NRA?

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1 A. I use a car service on occasion.
2 Q. Did you bill that to the NRA?
3 A. It was an NRA account.
4 Q. Okay. Was that for your personal use,
5 that car?
6 A. It was always for business.
7 Q. Okay.
8 A. But -- but probably more extensive than
9 some because I was still recovering -- during some
10 period of the time was recovering, and Wayne
11 LaPierre was very generous about my use of the car
12 service.
13 Q. Did you charge the NRA with personal
14 family meals?
15 A. I did not.
16 Q. Okay. Did you charge the NRA with other
17 personal expenses such as clothing expenses?
18 MR. CHAMBERS: Objection. What are we
19 talking about, time frame?
20 MR. DICKIESON: 2017 to the present.
21 A. Not that -- during that period, that
22 period when you're at a hotel and you submit the
23 hotel and it's a business event, I tried to delete
24 the -- any personal items that are on that hotel
25 bill to submit and -- and what I ended up doing was

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1 just putting down two different credit cards, one
2 for incidentals and then one for -- but I don't
3 remember anybody asking me anything about any of
4 those items in a critical way.
5 Q. Have you ever been told to reimburse the
6 NRA for inappropriate expenditures you made on your
7 expense account?
8 A. During this time -- like for what? I
9 mean...
10 Q. It seems to me that would be something
11 that would be readily accessible if you were told
12 that you were misusing an NRA expense account.
13 MR. CHAMBERS: Objection, form.
14 MR. DICKIESON: Is that anything you
15 recall?
16 A. Not during this time.
17 Q. What about an earlier time?
18 A. What time frame?
19 Q. During your entire tenure at the NRA.
20 A. There -- there was a period of time in
21 early 2000s where there -- there was a review, and
22 it was reviewed by the board and appropriate
23 committees where there were some inappropriate
24 expenses that I paid back.
25 Q. What were the nature of those

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1 inappropriate expenses?
2 A. Primarily clothing and some travel that
3 ended up being personal rather than business is my
4 recollection.
5 Q. How much did you have to pay back?
6 A. I'm -- I am not sure. In the process of
7 looking for that now it was so long ago. I'm not
8 sure.
9 Q. You say you're in the process of looking
10 for that information?
11 A. (Witness nodding.)
12 Q. Why would you be interested in finding
13 that information now?
14 MR. CHAMBERS: Objection, form. Millie,
15 I'm going to ask you not to answer that. It's
16 under privilege.
17 MR. DICKIESON: Okay. What's the basis
18 for the instruction not to answer?
19 MR. CHAMBERS: Privilege.
20 BY MR. DICKIESON:
21 Q. Does that search for information relate to
22 something that your attorneys have talked with you
23 about?
24 MR. CHAMBERS: Millie, don't answer that
25 question. I'm instructing her not to answer on the

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1 basis of privilege. What she's referred to relates
2 to a privileged process.
3 MR. DICKIESON: Okay.
4 BY MR. DICKIESON:
5 Q. Did Wayne LaPierre help you with the
6 reimbursement by increasing your salary to help pay
7 back the reimbursement?
8 A. Not that I recall.
9 Q. Okay.
10 Do you engage in any private speaking
11 engagements where you can earn extra money apart
12 from your NRA salary?
13 A. I do not.
14 Q. Did you ever earn a fee with the Wisconsin
15 Republican party?
16 A. No. I've never spoken to the -- that I
17 recall to the Wisconsin Republican party.
18 Q. Okay. Or any event in Wisconsin did you
19 receive a fee -- a speaking fee?
20 A. We routinely -- if I go to speak at a
21 function, we routinely decline all fees. It's part
22 of the job to go speak about the NRA. I have -- I
23 have no memory of anything like that occurring.
24 Q. Are there -- you say routinely, but is
25 there some exceptions where you did, in fact,

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1 accept a fee?
2 A. Not -- not me, but, say, a board member
3 accepting a job and there's an honorarium. Most
4 people turn the honorarium over to the NRA
5 Foundation. That -- that has never happened to me
6 where there was -- I've not been to a thing that I
7 remember to where an honorarium was offered or
8 there was a fee.
9 Q. Has your husband ever accepted speaking
10 fees for an NRA-related event?
11 A. No.
12 MR. CHAMBERS: Objection, foundation.
13 A. No. He -- no.
14 Q. Did you charge the NRA for travel expenses
15 to travel to California to see your mother and
16 father?
17 A. Any travel to California was -- was
18 business related, but my parents, when they were
19 alive, also lived in California and I tried to find
20 a way to see them as long as I was out there. It
21 wasn't always possible.
22 Q. I want to turn our attention now to the
23 April 2019 NRA convention. Is it called a
24 convention or it's called something else?
25 A. Annual meeting.

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1 Q. The NRA annual meeting. That was in late
2 April of 2019?
3 A. Yes, I believe so. I would have to look.
4 Q. And what days of the week does the annual
5 meeting take place?
6 A. Days of the week is the officers -- the
7 officers get together on Wednesday and then there
8 are events Wednesday night. There are committee
9 meetings Thursday and events Thursday night, and
10 Thursday is also when the exhibit hall opens.
11 Friday there are a number of events, plus it is
12 all -- it is the big ILA political forum, and then
13 usually could be a musical-type event Friday night.
14 Saturday is the members meeting, the annual meeting
15 of the members. Saturday night is the big gala.
16 Sunday is the last day of the exhibit hall being
17 open and maybe other committee meetings. Sunday
18 evening is the president's reception. Monday is
19 the meeting of the board of directors where new
20 board members are sworn in. That's traditionally
21 how -- it's been like that for as long as I can
22 remember.
23 Q. Were you out there the entire time from
24 Wednesday through Monday?
25 MR. CHAMBERS: For the record, out where?

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1 BY MR. DICKIESON:
2 Q. Was this in Indianapolis?
3 A. This was in Indianapolis, and I was in
4 Indianapolis for that whole duration.
5 Q. Did you actually get there before
6 Wednesday to help plan?
7 A. I think -- I think I arrived on Tuesday in
8 order to get ready for the Wednesday.
9 Q. Did you have any discussions with anyone
10 prior to the NRA annual meeting about the -- the
11 lawsuit against Ackerman McQueen?
12 A. I -- I wasn't involved in all of the legal
13 stuff, and I only knew about the lawsuit after
14 there was a story that it was filed and I think
15 that was a week or two before the annual meeting.
16 And I didn't talk to anyone, nor did anyone seek me
17 out. I'm not of a legal mind. I knew it had
18 happened, but -- and I thought, oh boy, but other
19 than that, I didn't feel compelled to talk to
20 anyone.
21 Q. Were you spending much time with Wayne
22 LaPierre during the annual meeting?
23 MR. CHAMBERS: Objection, form.
24 A. There were specific events that Wayne
25 participates in -- I forgot the corporate lunch is

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1 also on Thursday -- and I did those with him.
2 There were events that I -- that he has other
3 people staff, not me, and -- and I also spend -- I
4 also spend most of Friday, the political forum day
5 with Chris Cox helping to manage the political
6 people and the photo lines and that sort of thing.
7 I spend time with -- with the -- usually
8 spend time with the Saturday night production
9 people who are -- who are normally Ackerman McQueen
10 and were Ackerman -- I can't remember what
11 happened. Was it Ackerman McQueen -- I don't -- I
12 don't remember how that -- that happened. I know
13 that -- so yes, some intense time with Wayne, some
14 intense time not with Wayne. There were other
15 things that needed to be done.
16 Q. Did you have any interaction, without
17 telling me what that would be, with any attorneys
18 during the annual meeting?
19 A. Speaking to them?
20 Q. Speaking to them or talking to them on the
21 phone or sending e-mails.
22 A. No e-mails. I had -- yes, I had
23 interaction with some.
24 Q. And who were these attorneys representing?
25 A. They were -- the attorneys were -- well,

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1 the attorney -- the primary attorney was
2 Mr. Brewer, and then on that week, sometime that
3 week, early in the week Mr. Whit Davis had been
4 hired to be specifically counsel for the board and
5 I met him during that week. Attorneys. I think
6 that was it.
7 Q. Did you -- did you have any interaction in
8 2019 with Steve Hart, the attorney for the board?
9 A. Yes. He was -- he was let go just prior
10 to the annual convention itself.
11 Q. Did Wayne LaPierre discuss with you why
12 Steve Hart was let go?
13 A. I think I know that only through
14 privilege.
15 MR. CHAMBERS: Okay. So I'll instruct you
16 not to answer.
17 BY MR. DICKIESON:
18 Q. Okay. Let me ask some questions about
19 whether or not the privilege exists.
20 You -- you learned it through Wayne
21 LaPierre; is that correct?
22 A. Yes, and I'm trying to remember with
23 Mr. Brewer in the room or not.
24 Q. Okay. You don't know?
25 A. I don't remember. I just don't -- so much

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1 was happening. I just -- I don't remember.
2 Q. And was this -- was this told that this
3 was a confidential discussion when he told you
4 this?
5 MR. CHAMBERS: Objection, form.
6 A. I believe so at the time because I think
7 it was when I was told it wasn't generally known.
8 And -- and now I can't recall what was eventually
9 said to the board or to the world, but I know it
10 ended.
11 Q. Is it your understanding that what was
12 said to the board was the same thing that you were
13 told in that conversation?
14 A. I can't remember. I can't remember.
15 Q. Were there -- to your recollection, was
16 Wayne LaPierre dealing with any other attorney
17 other than Bill Brewer?
18 A. And Steve Hart up to that time and our
19 in-house general counsel, John Frazer, to my
20 knowledge, but I was -- I was not -- I was not a
21 part of those meetings. It just was I would hear
22 about them or I would see people go in and out, but
23 I -- but nobody said let's include Millie in this
24 meeting.
25 Q. Did you have any discussions with any

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1 other persons about, you know, what's happened to
2 Steve Hart?
3 A. The -- the other person that's a lawyer
4 that might have -- that I believe was included is
5 Charles Cotton, who is an attorney and was -- and
6 is first vice president, and now that -- I don't
7 know whether other lawyer people on the board were
8 informed in a different way than everybody else.
9 Q. What did Mr. Cotton tell you?
10 A. No. I just know that he was one of the
11 persons that was touched. I didn't have a
12 conversation with Mr. Cotton about it.
13 Q. I want to dig into the facts leading up to
14 the phone calls that you had with Oliver North and
15 with Dan Boren. Excuse me.
16 A. Yes, sir.
17 Q. That was on Friday; is that correct?
18 A. No. It was on Wednesday.
19 Q. It was on Wednesday?
20 A. Yes.
21 Q. The 24th; is that right?
22 A. I -- if Wednesday was the 24th, yes. It
23 was -- it was surrounding that -- the officers
24 meeting.
25 Q. Okay. And what -- what were you doing

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1 that morning?
2 A. Wednesday morning?
3 Q. Yes.
4 A. I don't remember specifically, but some of
5 that morning was engaged in making sure the lawyer
6 board members who were at Indianapolis got to meet
7 the new board counsel, Whit Davis. It was -- by
8 then there were some negative articles in the
9 newspaper and -- and just talking to people in
10 general about what they knew to give Wayne
11 information.
12 Q. And what was the substance of those
13 discussions?
14 A. These were people who were supportive of
15 Wayne and they were concerned.
16 Q. What were they concerned about?
17 A. They were concerned that the articles
18 would get interpreted as truth and wanted to know
19 what they could do to help.
20 Q. And do you recall what articles you're
21 referring to?
22 A. I -- I think at this time it might not
23 have been -- I'm not sure. I think they're mostly
24 like blogs and tweets and The Trace, but in -- in
25 the gun community very much of note and we had

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1 certain board members that were not happy with
2 Mr. LaPierre.
3 Q. Why?
4 A. Because they --
5 MR. CHAMBERS: Object to foundation.
6 A. They -- instead of asking what was the
7 truth or asking to talk to Wayne -- Wayne LaPierre,
8 they assumed that these articles were true and kind
9 of gave fuel to a crowd that was -- has been anti-
10 Wayne LaPierre for a while.
11 Q. Do you recall what in the articles was not
12 true?
13 A. I -- I don't. I don't.
14 Q. Did you have discussions with Wayne
15 LaPierre about the negative articles?
16 A. I was in the room when those discussions
17 were held, but they were really -- it was more like
18 I was an observer. The intensity of those
19 discussions were with our public affairs director,
20 Andrew Arulanandam, Josh Powell, Mr. Brewer, and --
21 and sometimes other board members who were
22 supportive of Wayne.
23 THE REPORTER: What was Andrew's last
24 name?
25 THE WITNESS: Arulanandam, A-R-A --

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1 MR. DICKIESON: A-R-A -- A-R-U --
2 THE WITNESS: Aru, L-A-N, dam, D-A-M.
3 Arulanandam, but it's all A's if you ever have a
4 choice.
5 THE REPORTER: Thank you.
6 BY MR. DICKIESON:
7 Q. Where were these discussions?
8 A. They -- I don't know where Mr. Brewer was
9 staying. So some of them probably were where he
10 was staying, but when -- at the headquarters hotel,
11 they would take place in -- in Wayne's suite.
12 Q. Did you receive a call from Dan Boren that
13 morning?
14 A. I received a number of calls from
15 Mr. Boren on Wednesday morning, which I did not
16 return because I didn't recognize the number or the
17 area code, and when I don't, I want them to leave a
18 message so I know how to -- then I would call them
19 back.
20 Q. So did you call him back?
21 A. He ended up texting me and saying it's me,
22 Dan Boren. I don't know whether he said I need to
23 talk to you urgently or -- I have -- I have written
24 notes on this that I could look at.
25 Q. Okay. We'll get to that in a second.

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1 A. Okay.
2 Q. But I just want your overall --
3 A. Okay.
4 Q. -- impression.
5 A. My memory's not that great. Okay. Go
6 ahead.
7 Q. So what was -- what was your impression
8 from the text that you got from Dan Boren?
9 A. We were just beginning the officers
10 meeting and I had never had any dealings with
11 Mr. Boren at all. He didn't attend board meetings
12 that often and our paths just never crossed. So I
13 was surprised he was calling me as opposed to
14 somebody else in the room. And I said to the group
15 of the officers that were there Dan Boren has just
16 texted me and said I need to speak to him right
17 away, and everybody said, well, go talk to him. So
18 I stepped out of the dining room into the living
19 room area to return the phone call.
20 Q. This is all in Wayne LaPierre's suite?
21 A. No. This is actually in Ollie North's
22 suite. We had the officers meeting in Colonel
23 North's suite.
24 Q. And was Wayne LaPierre in the suite at the
25 time?

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1 A. Yes.
2 Q. And did the text say that Dan Boren wanted
3 to talk to Wayne LaPierre?
4 A. No. He said he wanted to -- the text said
5 that he needed to talk to me.
6 Q. Okay. So did you talk to him then?
7 A. I did.
8 Q. And what's your impression of what he told
9 you?
10 MR. CHAMBERS: Objection. What do you
11 mean by "impression"?
12 MR. DICKIESON: I'll rephrase it. What
13 did he tell you?
14 MR. CHAMBERS: Still object. I mean, the
15 witness says she has notes of the call. I mean,
16 wouldn't you want to just --
17 MR. GONZALEZ: Can we just take a five-
18 minute break?
19 MR. CHAMBERS: Sure.
20 THE VIDEOGRAPHER: We're going off the
21 record at 4:17 p.m.
22 (A short break was had.)
23 THE VIDEOGRAPHER: We're going back on the
24 record at 4:35 p.m.
25 BY MR. DICKIESON:

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1 Q. All right. Before we look at the notes, I
2 just want to make sure you have -- do you have any
3 recollection of your phone call with Dan Boren
4 without looking at your notes?
5 A. I -- I have a general recollection.
6 Q. What is your recollection of that
7 conversation?
8 A. One, I was surprised -- one, I was
9 surprised that he was calling me because I didn't
10 know him and I -- when he called me I said I need
11 to step out.
12 He said, I know you're in an officers
13 meeting, and then -- and then boom, without getting
14 into -- I don't want to mischaracterize, but I felt
15 like I was punched in the stomach because basically
16 he said that there are bad allegations coming out
17 and that -- and that -- unless Wayne resigned.
18 And I said something. I said, Well, no,
19 and he said, I'll try to buy some time. And then I
20 don't remember whether he said or I said let me get
21 this back into the meeting, the officers meeting or
22 something or get to Wayne, and that's what I
23 generally remember.
24 I had no inkling, nor had -- if anybody
25 else had an inkling they hadn't said anything to me

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1 that something like this was in the works or could
2 happen. Nobody hinted at it and everybody was sort
3 of milling around in terms of listening, and that
4 was just -- it was very upsetting to me personally,
5 and I was upset when I came back to tell the group.
6 Q. And what did you tell the group?
7 A. I -- I hadn't taken notes because I didn't
8 know it was going to be that kind of conversation,
9 but what I tried to do was that as I was telling
10 the group my conversation with Dan Boren, I tried
11 to write things because I knew that I would -- I
12 would forget. So I'm writing and telling them at
13 the same time lawsuit, Ackerman McQueen, Wayne
14 resignation. There were some specifics I don't
15 remember in my notes. Maybe financial stuff. I
16 don't remember because I don't want to get it mixed
17 up with my conversation with Colonel North, and if
18 I don't look at my notes I'll get them mixed up.
19 But when I came back to tell the group what had
20 happened because they were all waiting for me,
21 Wayne just was very upset, said an expletive and
22 left the room, left, and I -- who was left in the
23 room was Carolyn -- was president Ollie North,
24 first vice president Richard Childress, second vice
25 president Carolyn Meadows, Nick Perrine, the staff

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1 to the president, and myself, and I said -- this is
2 the first time that I'd heard anything about Wayne
3 resigning, and I said to -- after Wayne left I said
4 to Mr. Childress, Do you want Wayne to resign? And
5 he said, Every man -- every man has his prime and
6 every man has his time. And I -- I had no idea
7 that Richard Childress wasn't supportive of Wayne.
8 By -- by this time I'm crying and I say to
9 Ollie, President North, Do you want Wayne to
10 resign? And he said, Not today. And -- and I'm
11 really crying by then. Ms. Meadows, she was really
12 tough about how could this come about to both
13 Mr. Childress and Mr. North. I was kind of just a
14 mess. I don't remember much of their conversation
15 except that she was -- she was really good. She
16 didn't fall apart like I did.
17 Then a few moments later they all got up
18 to go to the second half of the officers meeting in
19 another room that involved not only the three
20 elected officers, but also the officer of ILA,
21 Chris Cox; officer of general operations, Joe
22 DeBergalis; Tyler Schropp, director of advancement;
23 and Doug -- I can't remember his last name -- of
24 the -- director of publications. That broader
25 officer meeting is always scheduled after the

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1 smaller one so that everybody can say what they
2 know leading up to the annual meeting. So they
3 left and I went back up to Mr. LaPierre's suite
4 where he was.
5 Q. Okay. Let me ask you a few questions
6 about that, and I apologize for --
7 A. Can I -- do you want -- could I see my
8 notes?
9 Q. In good time we'll get there.
10 A. Okay.
11 Q. I need to get impressions first and test
12 how much you remember of the situation.
13 A. I'm -- okay.
14 Q. But the -- you mentioned that Wayne said
15 an expletive and left the room. I apologize, but
16 can you tell us what expletive he said? You can
17 spell it out if you like.
18 A. He said -- he said "That son-of-a-bitch
19 Angus McQueen."
20 Q. Okay. And do you know why he was blaming
21 Angus McQueen? Is it something you said about
22 Angus McQueen?
23 MR. CHAMBERS: Objection, foundation.
24 A. I'm assuming because what I came back to
25 tell the group from what Dan Boren told me was that

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1 Ackerman McQueen was going to instigate a lawsuit
2 with all kinds of negative allegations about Wayne.
3 Q. You were aware that the NRA had already
4 initiated a lawsuit against Ackerman McQueen,
5 weren't you?
6 A. I -- I knew about it. My recollection is
7 that -- and I could be wrong. My recollection is
8 that it had to do with simply requesting the
9 information that other vendors had provided in
10 order to be in anticipatory compliance with
11 New York not-for-profit law.
12 Q. And who told you that understanding of
13 that litigation?
14 A. Probably Mr. LaPierre in talking to board
15 members and I was in the room who were inquiring.
16 That's why I say -- because it wasn't a
17 conversation that I had with him I was in the room
18 and that's I believe what was said.
19 Q. You're talking about in the room that day
20 in Indianapolis, or is this some prior point?
21 MR. CHAMBERS: I apologize, Millie. You
22 have got to let Mr. Dickieson finish his question.
23 THE WITNESS: I'm sorry. I'm sorry.
24 MR. CHAMBERS: Listen to the question and
25 answer the question that he's asking you.

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1 THE WITNESS: Okay. I'm sorry.
2 MR. DICKIESON: Go ahead. Was that at
3 some prior place and time?
4 A. I think the first time it registered to me
5 is in conversations that Wayne might have had with
6 the -- the officers, Mr. North, Mr. Childress, and
7 Ms. Meadows maybe the week before. I don't know
8 whether it was in person, but there were
9 conversations after it was filed that I remember
10 hearing in parts and bits because I didn't know,
11 prior to it's being filed that it was being filed.
12 So my interpretation may not be clear.
13 Q. But these are meetings you were present
14 at?
15 A. In and out. In and out.
16 Q. Was it your understanding that Wayne
17 LaPierre was surprised that -- that there would be
18 a counterclaim to a lawsuit that they -- that the
19 NRA filed against Ackerman McQueen?
20 MR. CHAMBERS: Object to foundation.
21 MR. COLLINS: Object to form.
22 A. I -- he was -- he was very angry. I was
23 surprised, but I can't characterize -- I think
24 that -- I think, my interpretation, that the
25 overwhelming reaction that Wayne had was anger

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1 because he -- he doesn't curse.
2 Q. Were you surprised that his anger was
3 directed at Angus McQueen?
4 A. I wouldn't know enough to because I don't
5 know -- there's was a long-standing relationship
6 that I observed very little of and I didn't know
7 Mr. McQueen.
8 Q. Did Wayne LaPierre refer to Mr. McQueen as
9 his friend?
10 A. Very much so. Very much so.
11 Q. And do you know who authorized the lawsuit
12 against Ackerman McQueen?
13 A. I don't. I don't.
14 Q. Do you know if it was authorized by the
15 board?
16 MR. COLLINS: Objection to the form.
17 A. I don't know. It was discussed at a board
18 meeting, but I -- I just don't know.
19 Q. So what did Dan Boren say precisely
20 about -- that you remember about Ackerman McQueen
21 in that conversation?
22 A. That Ackerman McQueen was going to file a
23 lawsuit and they had -- there were a number of
24 things that they were going to say that would
25 reflect negatively on Wayne and the Association,

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1 and I -- I can't remember whether there was any
2 itemization of anything the way there was in the
3 conversation with President North. I just don't
4 remember.
5 I -- and -- but, I mean, the last line
6 from Mr. Boren was I will see if I can buy a couple
7 of hours. And I said I would get this to Wayne
8 immediately or something like that and he said
9 please do, but it was that kind of...
10 Q. Was it your understanding that the group
11 that you reported to was angry at Dan Boren as a
12 result of this phone call?
13 A. I don't think so. I don't --
14 Q. Did they view it as a warning from Dan
15 Boren?
16 MR. CHAMBERS: Objection, form.
17 A. I don't think that anybody thought -- no
18 one said to me that, oh, this is a warning and, oh,
19 Dan Boren is -- nobody had any ill will or any
20 reason to question -- I just didn't know that he
21 knew any of the characters in the whole scenario.
22 I -- I don't know him. Okay?
23 Q. Did you interpret what he was saying as a
24 warning?
25 A. I interpreted it as a real thing, not a

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1 warning.
2 Q. Okay.
3 A. I -- I don't -- my memory -- unless
4 there's something in my notes, my sense is that, oh
5 my God, what -- I didn't think of it as, oh, strike
6 one. I thought of it as the real deal.
7 Q. And what do you mean by "the real thing"
8 and "the real deal"?
9 A. That it was not a warning. It was action
10 will be taken unless the Association and
11 Mr. LaPierre do something or say something to deter
12 this process which Dan Boren told me has begun.
13 Q. Okay. Did you have the impression that
14 Dan Boren was making a threat?
15 MR. COLLINS: Objection to the form.
16 A. I -- I didn't have that impression at all.
17 It was -- it wasn't Millie. I mean, it was a
18 cordial conversation with a man that I didn't know
19 who I thought was trying to be helpful by giving
20 this information to the board, to those officers of
21 the board.
22 I assumed that he knew from somewhere that
23 the board -- those officers would be meeting
24 because he referred to that several times, and I --
25 other than being felt -- I -- I was grateful that

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1 he called to give a heads-up if I had to
2 characterize. He wasn't -- he wasn't threatening
3 at all in his tone to me or in the way he
4 characterized the substance.
5 Q. Okay. What happened then after that
6 meeting? What did you do next?
7 A. After the meeting broke up?
8 MR. COLLINS: Objection to the form.
9 MR. DICKIESON: After the meeting broke
10 up, correct.
11 MR. COLLINS: What meeting?
12 MR. DICKIESON: This is the meeting -- the
13 post Dan Boren discussion meeting.
14 A. As I said, Mr. LaPierre left, and then a
15 few minutes later everybody left to go -- they were
16 already late for the next officer meeting, that
17 expanded one, and I went back to Wayne's suite.
18 Q. And do you know where Oliver North went?
19 A. Oliver North and Carolyn Meadows and
20 Richard Childress went to the expanded officers
21 meeting to which Wayne did not attend. He was in
22 his suite.
23 Q. Did he not attend because he was still
24 upset or just he didn't have to attend?
25 MR. CHAMBERS: Objection, foundation.

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1 A. I -- it would be very unusual for him to
2 not attend such an expanded meeting, particularly
3 an annual meeting, but I would not say he did not
4 attend the meeting because he was upset. I think
5 he -- when I got back to the suite he was talking
6 to board members, and I -- I'm not sure whether
7 Mr. Brewer and Mr. Powell were in the room, if they
8 weren't in the room he was either on the phone, but
9 Wayne was trying to find out more, what everybody
10 knew.
11 Q. Find out more about what?
12 A. Whether they knew anything about this
13 Ackerman McQueen stuff that Mr. Boren had told me.
14 Q. Okay. Is that when you received the call
15 from Oliver North?
16 MR. CHAMBERS: Objection, foundation.
17 A. Once I was back in the room it was later
18 in the afternoon -- and I have the time noted in my
19 notes -- Carolyn Meadows had returned from the
20 officers meeting, that expanded one, and there were
21 maybe half a dozen or more board members that were
22 making calls to other board members to basically
23 ascertain what they knew and were they supportive
24 of Wayne LaPierre, and Wayne was an active
25 participant in that.

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1 Q. So did that entire group know about the
2 Dan Boren phone call?
3 MR. CHAMBERS: Objection, foundation.
4 A. The people that were in the room -- I
5 don't remember specifically, but they -- I think
6 they -- I think they probably did. I don't think
7 Wayne was hiding it from anyone. And Carolyn was
8 back and she was substantiating what had been said
9 in the officers meeting and that -- and that she
10 had come back to Wayne's room, and Mr. North and
11 Mr. Childress went somewhere else.
12 Q. Was there something in the officers
13 meeting that addressed what Mr. Boren had referred
14 to?
15 MR. CHAMBERS: Objection, foundation.
16 A. I don't know what you mean.
17 Q. You said that Carolyn Meadows was back and
18 she was reaffirming what had been said in the
19 officers meeting?
20 A. Yes. She -- she recounted to people what
21 I had said Dan Boren had said and that Wayne had
22 left the room, and then she recounted what had
23 happened after Wayne left. I know that she told
24 Wayne that and others as well who were listening.
25 Q. So by this time most of the officers of

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1 the NRA knew about the Dan Boren phone call; is
2 that correct?
3 MR. CHAMBERS: Objection, foundation.
4 A. By officers that's because they were in
5 the meeting. I do not know in the broader officers
6 meeting whether it was discussed at all because I
7 wasn't in attendance. And Ms. Meadows would know
8 and Mr. North and Mr. Childress would know, but I
9 don't know.
10 Q. And of the people in that room many were
11 on their phone trying to find out more information;
12 is that what you're saying?
13 A. Trying to see if there was -- whether
14 anybody they were calling knew and also trying to
15 make sure that people were standing by Wayne.
16 Q. Was Mr. Childress in the room then?
17 A. No, he was not.
18 Q. Is this the time period when Oliver North
19 called you?
20 A. Yes, which was -- and I don't remember
21 without my notes, but I think it was sometime
22 after -- after 2:00. I wrote it down.
23 Q. Did you have lunch in between the Dan
24 Boren call and the Oliver North call?
25 A. The officers meeting was supposed to be

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1 the luncheon. So nobody had eaten.
2 Q. Except the people that went to the
3 officers meeting, I assume?
4 MR. CHAMBERS: Objection, foundation.
5 A. No. Just was nobody -- nobody ate.
6 Q. Okay.
7 A. It was supposed to be a lunch, but it just
8 didn't work out.
9 Q. So walk me through your receiving a call
10 from Oliver North. What happened?
11 MR. CHAMBERS: Counsel, I'm going to
12 object to this. The witness has made clear that
13 she took notes of the conversation, that that would
14 be her best recollection of what happened, that
15 she's hazy otherwise. I presume that you have the
16 notes. It seems to me this is just an attempt to
17 test to see if she says something, you know,
18 inconsistent. It's your dime, but -- I'll just
19 leave it at that.
20 BY MR. DICKIESON:
21 Q. All right. So walk me through what you
22 recall about the -- receiving the phone call from
23 Oliver North.
24 A. I had been on the phone with another board
25 member, Ken Blackwell, and -- who wanted to talk to

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1 Wayne. So I gave Wayne my phone so he could
2 continue to talk to Mr. Blackwell, and while Wayne
3 was on the phone to Mr. Blackwell Mr. North was
4 calling me on my phone and Mr. LaPierre held my
5 phone up so that I could see that President North
6 was calling me. And Carolyn Meadows happened to be
7 standing by and she wasn't on her phone. So I took
8 her phone to call Colonel North back, and that's
9 how that conversation came about.
10 Q. Okay. So what was in the conversation?
11 MR. CHAMBERS: Objection, form.
12 A. Just sort of -- I have really good notes
13 because at some -- we talked a bit and he said --
14 he said -- I think he said something like Dan Boren
15 read me the whole Ackerman McQueen letter, and I
16 said, Do you have a copy? I can come down and make
17 a copy. And he said, No, I don't want anything
18 with the Ackerman letterhead, he said, But let
19 me -- please get this message to Wayne.
20 And so I went to get a -- I didn't have a
21 notepad. I went to get a notepad and I was sitting
22 in the bedroom on like a chaise lounge and had the
23 notepad on my knees and put it on speaker because
24 there were more people that were close by so that I
25 could take notes with both hands, and as a result

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1 Ms. Meadows heard at least some of the
2 conversation.
3 And he said, gosh, financial -- the
4 contents of this document were financial
5 mismanagement accusations, sexual harassment
6 charges against Josh Powell, clothing expenditures
7 by Wayne and he might have said a number, but I
8 didn't write it down in my notes. So I wasn't
9 aware of the number until it came out in the
10 papers. That's one, two, three. Something about
11 Tyler Schropp and something about an apartment for
12 Wayne or Susan's niece.
13 Q. Did it seem that he was reading from a
14 document?
15 MR. CHAMBERS: Objection, foundation.
16 A. I could not -- I could not tell. He said
17 he didn't have a copy of the document, and I
18 believe him. So it must have been from his own
19 notes because I think he would have let me come
20 down and get a copy otherwise.
21 Q. Did he say where he got the information
22 from?
23 A. He said Dan Boren -- I think he said Dan
24 Boren called, but then it sounded like he saw a
25 copy but didn't keep a copy. But I don't know.

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1 Q. Did you interpret the information he was
2 giving you as a threat?
3 MR. COLLINS: Objection to the form of
4 that.
5 A. I -- I was glad that Ollie was telling,
6 that had gotten more detail because I had never
7 heard President North say in my presence a negative
8 word about Mr. LaPierre. He didn't like some
9 people, but he was in my presence always
10 complimentary of Wayne.
11 Q. So it's your impression that he was just
12 passing on information that he received?
13 MR. CHAMBERS: Objection, form.
14 A. That's not the end of the conversation.
15 I'm taking notes and then he said to me -- and I
16 wrote it down precisely because it was important.
17 He said something to the effect of but if I, Ollie,
18 am still president I can make this all go away and
19 help Wayne, which is all I've ever wanted to do,
20 something reassuring like that, and I, Ollie, can
21 talk to Angus McQueen and we can find -- I don't
22 know if the verb was find, I wrote it down --
23 find -- the phrase was "get X months for Wayne."
24 And that's sort of when I again started to cry
25 because that meant to me that Mr. North did not

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1 want Wayne LaPierre to remain because X months is
2 months and -- something about "get X months" and
3 then get him an excellent retirement.
4 And then I was getting up because I was
5 just very upset and was starting to walk to Wayne,
6 and he said, Get this to Wayne as quickly as
7 possible. I might have said he's in the other
8 room, but I certainly said I will. And then he
9 said, But don't give it to him when -- something
10 like Josh and Bill are around.
11 I have really good notes and I went
12 directly from writing those notes and read them
13 aloud to Wayne with a number of people around him
14 listening to my telling it to him, but I didn't --
15 I did not stop and I think that -- I think
16 Ms. Meadows, I don't know if somebody else, maybe
17 Ms. Froman or Mr. Bach, they certainly knew. Some
18 people in the room I think knew I was talking to
19 Mr. North. Ms. Meadows did because she was
20 listening in to the conversation while I was on
21 speakerphone. They know I got up from that
22 conversation and went directly to talk to Wayne.
23 Q. Who was Josh and Bill that you referred
24 to?
25 A. I interpreted it to mean Josh Powell and

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1 Bill Brewer.
2 Q. So were they around when you reported this
3 to Wayne LaPierre?
4 A. They were certainly around before and
5 after and may have been during, but they were in
6 and out all the time. So that I don't know if they
7 were actually in the room when I told it to Wayne.
8 If they were not, they were there shortly
9 thereafter. I just -- I can't -- I can't visualize
10 it.
11 Q. Do you think that you would have done
12 something that -- that Oliver North expressly asked
13 you not to do and report this to Wayne in front of
14 them?
15 MR. CHAMBERS: Objection, form.
16 A. Not -- as to whether I would have done it,
17 I -- I think I was so rattled and so upset I wanted
18 to get it directly to Wayne and he was in the next
19 room. That would lead me to believe that maybe
20 they weren't in the room, but I don't know. I just
21 wanted to get it to him and Ollie encouraged me to
22 do it ASAP, but I don't know if -- that's what I
23 did.
24 Q. How did Wayne LaPierre react to your
25 message?

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1 A. I don't remember his reaction, but
2 Ms. Froman and Mr. Bach, who are board members and
3 also lawyers that were listening, said that's
4 extortion.
5 Q. Was that your view, that Oliver North's
6 statement was extortion?
7 MR. COLLINS: Objection to the form.
8 A. I do not know that definition of what
9 extortion is. It's not a word that was in my
10 universe.
11 Q. Did you inform the board members that day
12 that you don't believe it was extortion?
13 A. I didn't say one way or the other. I went
14 immediately to start to type up my notes and really
15 I didn't participate in those discussions. I
16 don't -- there were legal discussions with board
17 members who were lawyers and that sort of thing,
18 but I was not -- I had an event that evening to get
19 ready for. So I was doing other things as well and
20 that wasn't my area of anything.
21 Q. When you reported the Oliver North
22 conversation to Wayne LaPierre in front of these
23 people, did you report everything that -- that
24 Oliver North said in the conversation?
25 MR. CHAMBERS: Objection, foundation.

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1 A. I reported everything that I had in my
2 notes because I read them, and if there were things
3 that I remembered because the conversation was
4 directly after that I didn't have on the notes I
5 added them and that's why I wanted to type
6 something up while it was still in my brain. So
7 there are my yellow pad notes and then there are
8 notes that I put on the iPad, Ollie North's
9 conversation and then Dan Boren's conversation,
10 because I knew that, one, sometimes I can't read my
11 own handwriting and, two, I wouldn't remember.
12 Q. What was Wayne LaPierre's reaction when
13 Froman and Bach said that's extortion?
14 MR. CHAMBERS: Objection, foundation.
15 A. If Mr. Brewer wasn't in the room, then
16 I -- I think he probably just got on the phone, and
17 maybe the other board members who are lawyers
18 participated as well. I don't remember. I just --
19 I was kind of recovering from that phone call. So
20 after I gave it, I tuned out, maybe sat for a
21 second, and then went to write up fuller notes
22 because I love Ollie North and I -- I didn't know
23 anything like this was going to happen.
24 MR. CHAMBERS: All right. We're --
25 THE WITNESS: I'm sorry.

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1 MR. CHAMBERS: That's okay. I think it's
2 about time we take a break.
3 THE VIDEOGRAPHER: We're going off the
4 record at 5:13 p.m.
5 (A short break was had.)
6 THE VIDEOGRAPHER: We're going back on the
7 record at 5:44 p.m. This is the beginning of media
8 unit No. 6 in the deposition of Millie Hallow.
9 MR. DICKIESON: All right. As we go back
10 on the record I want to have marked as the next
11 exhibit a packet of handwritten notes. We can mark
12 that as what number exhibit?
13 THE REPORTER: 15.
14 MR. DICKIESON: 15. We'll mark that as
15 15.
16 THE WITNESS: May I also see my typed up
17 notes? No.
18 MR. DICKIESON: We'll get there.
19 THE WITNESS: Will we? I'm sorry. I'm
20 sorry. That's inappropriate.
21 (Hallow Exhibit 15 was marked
22 for identification.)
23 BY MR. DICKIESON:
24 Q. All right. First I want to ask
25 handwriting questions. Some of these notes are

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1 yours and some of them are not; is that correct?
2 A. This cover sheet is -- I think it's Andra
3 Fischer because somebody, it might have been
4 Mr. Brewer, asked me where my notes were, and I --
5 I believe I gave them to -- maybe it was during
6 Indianapolis -- I gave them to Andra Fischer and
7 said please hold this so that it doesn't get lost.
8 Then somebody from the Brewer law firm came and
9 collected them from Andra.
10 Q. Okay. How about the second page, whose
11 handwriting is that?
12 A. That is -- that is a shrunken version of
13 my note -- notes for Ollie's call, Mr. North's
14 call.
15 Q. Okay. And the third page, whose
16 handwriting is that?
17 A. That is my handwriting and evidently it
18 was on the other side of the sheet, but it doesn't
19 relate to the Oliver North call.
20 Q. Okay. We'll get back to the substance.
21 I'll go to the next page. Whose handwriting is
22 that?
23 A. That is my handwriting writing as I was
24 telling to the officers the Dan Boren conversation.
25 Q. Okay. And on the next page, whose

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1 handwriting is that?
2 A. That is not my handwriting, and I'm not
3 familiar with this.
4 Q. Could that be Carolyn Meadows'
5 handwriting?
6 MR. CHAMBERS: Objection, foundation.
7 A. I don't know.
8 Q. Okay. Let's look at the next page, then,
9 with the big X across it. Whose handwriting is
10 that?
11 A. I don't know. It is not my handwriting.
12 Q. And the next page, whose handwriting is
13 that?
14 A. I don't know. It is not my handwriting.
15 Q. Okay.
16 Did you provide these all to Andra Fischer
17 or only your notes to Andra Fischer?
18 MR. CHAMBERS: Objection, form.
19 A. The notes that were my notes upon
20 instruction from -- instruction from Brewer were
21 given to Andra Fischer.
22 Q. Okay.
23 Let's go to the first one in time, the --
24 your notes of the Dan Boren call. That's the
25 fourth page of the exhibit.

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1 A. Yes.
2 Q. What does -- can you read it to me.
3 What's the top thing? I don't understand that top
4 line.
5 A. On the right-hand side?
6 Q. Yes.
7 A. It says "E. Ling after 5:00." She's a
8 board member, E. Ling Nu, and I just had noted
9 totally not related to this that she wasn't coming
10 in until 5:00.
11 Q. Okay. And what are the arrows on the left
12 side of the top of the page?
13 A. That is my handwriting. I don't -- I
14 might have been -- I don't know. It's not related
15 to the Boren call.
16 Q. Okay.
17 A. It's just a piece of paper I had.
18 Q. So then you start your notes on the Boren
19 conversation right below where it says "Boren
20 conversation"?
21 A. Yes. I think -- yes. At first I think I
22 wrote down the text, "Right now I know you are
23 going into a meeting," and I think I still -- I
24 think I was told to take a picture of the text. So
25 that exists somewhere.

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1 Q. I see. And so was this note prepared
2 during the Dan Boren phone call?
3 A. I -- I didn't take notes because I didn't
4 know that -- it was a fairly quick phone call, but
5 I -- when I went back to tell the officers what
6 happened, I wrote as I was telling them. "I know
7 you're officers. I have to tell -- I have intel
8 that in the next two to three hours Ackerman
9 McQueen will file a lawsuit that will have negative
10 implications and impact for Wayne."
11 Q. Okay.
12 A. And I -- and that's all I wrote because
13 what was the uppermost in my mind was this
14 immediate resignation of Wayne. I might have
15 blurted that out in the beginning. I can't --
16 either the beginning or end of the conversation. I
17 can't...
18 Q. Okay. So where in your notes does it talk
19 about immediate resignation?
20 A. I -- I have a fuller version in my typed
21 up notes when that -- I can't remember. I
22 remembered it at the time even though it's not
23 noted because it still was fresh, but --
24 Q. You did the handwritten notes before you
25 did the typed up version; is that correct?

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1 A. Yes.
2 Q. So aren't the handwritten notes fresher
3 than the typewritten notes?
4 A. But they were --
5 MR. CHAMBERS: Objection, form.
6 A. The handwritten notes are fresher to the
7 conversation, but they are not fuller than what I
8 was able to recall when I was crazed with getting
9 the information out as quickly as possible to the
10 officers who were waiting.
11 Q. Okay. But is the -- what's in the
12 handwritten notes, is that what you told Wayne
13 LaPierre following the Dan Boren conversation?
14 A. The handwritten notes is what I told Wayne
15 LaPierre, Oliver North, Richard Childress, and
16 Carolyn Meadows. They were just past a sliding
17 wall.
18 Q. Okay. And so in -- you told Wayne
19 LaPierre "I have intel that in the next two to
20 three hours" --
21 A. Dan Boren told --
22 Q. Dan Boren told you this, but this is what
23 you told Wayne LaPierre, that Dan said "I have
24 intel that in the next two to three hours Ackerman
25 McQueen will file a lawsuit that will have negative

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1 implications" -- negative -- is that "implications
2 and impact for Wayne"? Is that --
3 A. Yes.
4 Q. So after he heard that statement he said
5 "that son-of-a-bitch Angus"?
6 A. Because I said that they wanted his -- Dan
7 also told me that they wanted his immediate -- this
8 could be put away if they got -- if Wayne
9 immediately resigned.
10 Q. So that's -- that's something that's not
11 in your notes but you told him that?
12 A. Yes.
13 MR. CHAMBERS: Objection, form. Not in
14 your handwritten notes.
15 THE WITNESS: Not in my handwritten notes.
16 Q. Okay.
17 A. And then not -- also not in my handwritten
18 notes is Mr. Boren said I will try to see if I can
19 postpone for a couple of hours.
20 Q. Okay. Now, was Froman and Beck there when
21 you told them about this -- the Dan Boren call?
22 A. No. It was only the officers.
23 Q. Okay.
24 Let's go to the Oliver North notes on the
25 second page, and were these notes taken while you

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1 were on the call?
2 A. Yes. Yes.
3 Q. Okay. And it looks like -- can you read
4 that on the record.
5 A. Which part?
6 Q. Wherever it starts and wherever -- to
7 wherever it goes.
8 A. In my written notes there's a top of --
9 there's conversation with Ollie where he said I got
10 a call from Dan Boren and I have more details.
11 Q. No. I'm asking you to read what's in your
12 handwritten notes.
13 A. Oh, just read it straight through?
14 Q. Right.
15 A. From the top?
16 Q. Yes.
17 A. "Ollie called me. I called him on CM
18 phone." Then I wrote "Dan, Ollie. 2:58 p.m.
19 Devastating account of financial status. Sexual
20 harass" -- ment meaning -- "/Josh. Wayne/clothing.
21 Schropp - 1/2 million luxurious travel, much but
22 not all reimbursed by NRA. Apartment" -- "4,
23 apartment for Susan niece," and then up at the top
24 I put "Allen." "Immediate resignation of Wayne.
25 Ollie willing -- Ollie willing to negotiate X

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1 months for Wayne" and something "not" something
2 "retirement excellent" on top. Oh, "Not -- not --
3 not negotiate -- "to negotiate X months for Wayne,
4 excellent retirement." And then up in this corner
5 "Not give" -- it's something "not if" -- "not"
6 something, "Not share -- not share if Wayne with
7 Josh and Bill."
8 Q. And that's the end of that note on the
9 call?
10 A. That's the end that's relevant to that
11 call, yeah.
12 Q. Okay. And is this the notes that you used
13 to convey that information to Wayne LaPierre?
14 A. Yes.
15 Q. And was there discussion you had with
16 Oliver North about Ackerman McQueen in this call?
17 A. That he, Ollie, if he was still president
18 was willing to negotiate with Angus McQueen and try
19 to get X months for Wayne with an excellent
20 retirement.
21 Q. Okay. Did it sound like Oliver North was
22 trying to solve the problem?
23 MR. CHAMBERS: Objection, foundation.
24 A. I -- I -- I thought he was until I heard
25 X months.

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1 Q. And what is it about X months that means
2 you think he was not trying to solve the problem?
3 A. It's because I think in terms of Wayne as
4 the leadership of the NRA in terms of years, not
5 months, and I just was -- I -- I was shocked at
6 that.
7 Q. Were you concerned that if Wayne LaPierre
8 left your job was in jeopardy?
9 A. That didn't cross my mind.
10 Q. So if he hadn't said "willing to negotiate
11 X months," you would have thought Oliver North was
12 trying to help the situation; is that right?
13 MR. COLLINS: Objection to form.
14 A. That's kind of a hypothetical, isn't it
15 now?
16 Q. Okay.
17 Did Oliver North ever tell you that he
18 wanted Wayne LaPierre to resign?
19 A. Never.
20 Q. Okay. Have you reviewed Oliver North's
21 deposition transcript in this case?
22 A. I have not.
23 Q. Do you have an understanding of what he
24 testified to about this conversation?
25 A. I have no idea.

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1 Q. Did you have the sense that Oliver North
2 had actually talked with anyone at Ackerman McQueen
3 before he made this call?
4 MR. CHAMBERS: Objection, foun- --
5 objection, form.
6 A. At the time I didn't think of that, and
7 looking back I have no clue. I don't -- when I
8 asked him if he had a copy of the Ackerman McQueen
9 document, he said, "No, I don't want anything with
10 Ackerman McQueen letterhead," and that is on my
11 typed up notes.
12 MR. DICKIESON: Okay. Let's go to your
13 typed up notes. This will be the next exhibit.
14 What do you have, Ms. Court Reporter?
15 THE REPORTER: 16.
16 MR. DICKIESON: 16. Okay.
17 (Hallow Exhibit 16 was marked
18 for identification.)
19 A. This is the typed version.
20 Q. All right. When did you type up these
21 notes?
22 A. In -- in Wayne's suite after I recounted
23 this -- the conversation with Ollie North I went to
24 immediately type both conversations up because I --
25 I don't remember stuff well.

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1 Q. And you typed them right on your iPad?
2 A. Right on my iPad on Pages.
3 Q. And who asked you to type up your notes?
4 A. No one did. I just knew that I would be
5 questioned about it and I wanted to be accurate.
6 Q. So there are things that you think are
7 added in the typed up notes that aren't in the
8 handwritten notes?
9 MR. CHAMBERS: Objection, form.
10 A. They're more complete. For instance, on
11 the note to Ollie I started writing when he said --
12 when I said, can you tell me about it, he said, "Oh
13 yes, and please share with Wayne." And then that's
14 when my yellow pad notes start showing up, but I do
15 remember that at the time Dan Boren just called me
16 and read me the letter, Ollie North tells me, and I
17 said, Is it bad, do you have a copy of it? And he
18 said, Oh no, the last thing I want in my possession
19 is something with Ackerman. That's not in my
20 yellow pad notes.
21 Q. And there's something in all caps on the
22 third page of this exhibit.
23 A. Yes.
24 Q. It says "This will all be withdrawn with
25 the immediate resignation of Wayne"; do you see

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1 that?
2 A. Yes.
3 Q. And that's not in your -- that's not the
4 way it's written in your handwritten notes; is that
5 right?
6 A. In my handwritten notes it said "Immediate
7 resignation of Wayne." So that's right, but that
8 is what he said.
9 Q. It says "Immediate resignation of Wayne,
10 window is short," right?
11 A. Yes.
12 Q. Now -- so is it your understanding that
13 Oliver North could actually state with confidence
14 that the new suit, whatever that would be, by
15 Ackerman McQueen would be withdrawn with the
16 immediate resignation of Wayne?
17 MR. CHAMBERS: Objection, foundation.
18 BY MR. DICKIESON:
19 Q. Is that your understanding?
20 A. My understanding was that -- my
21 understanding is that it seemed like he was willing
22 to do that, but I don't know whether -- if you're
23 asking whether he had the wherewithal to do it, I
24 don't know because it just -- I was so upset about
25 when he said X months that that is the first

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1 inkling I had that he wasn't totally supportive of
2 Wayne.
3 Q. Hadn't you just spoken with Wayne
4 previously and you mentioned that he wasn't -- he
5 was not totally supportive of Wayne earlier in the
6 day?
7 MR. CHAMBERS: Objection, form. I'm
8 sorry, Counsel, can you reask that question.
9 MR. DICKIESON: Okay.
10 BY MR. DICKIESON:
11 Q. You testified about an earlier meeting
12 after the Dan Boren phone call where Oliver North
13 was present, right?
14 A. The officers went to that expanded
15 officers meeting. I didn't go to that and I don't
16 know --
17 Q. No, but after the Dan Boren phone call
18 where you told that to Oliver -- to Wayne
19 LaPierre --
20 A. That's right.
21 Q. -- didn't somebody ask Oliver North what
22 his view was and you were surprised that he wasn't
23 totally support of Wayne?
24 A. That's right.
25 Q. Okay.

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1 A. That's when I was crying and I said, Do
2 you want -- do you want Wayne to resign?
3 Q. Okay.
4 A. And he said, Not today. So yes, you are
5 correct. I stand -- there was that inkling.
6 Q. Okay. And did he say in his phone call
7 later that he had spoken with anyone at Ackerman
8 McQueen?
9 A. He only said he had talked to Dan Boren.
10 Q. Right.
11 Do you know if there was a lawsuit filed
12 against the NRA when Wayne LaPierre did not resign?
13 MR. CHAMBERS: Objection, form.
14 A. I -- I do not.
15 Q. Did you, yourself believe that Oliver
16 North wanted Wayne LaPierre to resign?
17 A. I don't know.
18 Q. Isn't your prior testimony that you
19 believe that Oliver North was always supportive of
20 Wayne LaPierre?
21 A. I thought he was.
22 Q. In this statement it says "I can and I'm
23 willing to negotiate with Angus so that Wayne can
24 have X months and then have an excellent
25 retirement." Is --

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1 MR. CHAMBERS: Objection. Just to be
2 clear, Counsel, in her notes about someone else's
3 statement.
4 MR. DICKIESON: Right.
5 BY MR. DICKIESON:
6 Q. In those notes about Oliver North's
7 statement, does that indicate to you that he was
8 going to try to help Wayne LaPierre?
9 A. I was -- I can say I was fixated on the
10 X months and that it was only a short-term as
11 opposed to confidence in him going forth with the
12 future of the organization. That's how I
13 interpreted it.
14 Q. But you -- you know Oliver North very
15 well; is that right?
16 A. I thought I did.
17 Q. And you've professed an affectionate love
18 for him in this deposition and also I noticed you
19 signed some of your e-mails to him "Love Millie,"
20 correct?
21 MR. CHAMBERS: Objection, form.
22 A. There is an affection. He had cancer, I
23 had cancer. We prayed for each other and grew
24 close more recently over that kind of thing.
25 Q. And so is it your understanding that

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1 despite all those good feelings you have about him
2 that you believe he's committing a crime because he
3 says so that Wayne can have X months?
4 A. I don't --
5 MR. CHAMBERS: Objection, form.
6 A. I don't know what the crime.
7 Q. You don't think there was any crime
8 committed here?
9 A. I don't know what --
10 MR. COLLINS: Objection to the form.
11 BY MR. DICKIESON:
12 Q. Do you think he was trying to extort Wayne
13 LaPierre?
14 MR. CHAMBERS: Objection, form.
15 A. That was not for me to say. I do -- that
16 is a legal term and I -- I don't know.
17 Q. Did you get the sense that he was trying
18 to help Wayne LaPierre in this phone call?
19 A. Until I heard the X months, and then...
20 Q. And then what?
21 A. And then in that moment I knew he wasn't
22 supportive.
23 Q. Supportive of Wayne LaPierre remaining as
24 president?
25 A. EVP.

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1 Q. Executive vice president. Excuse me. Is
2 that what you mean, not supportive?
3 A. Not supportive ultimately of Wayne.
4 Q. Even if he's trying to negotiate an
5 excellent retirement for him?
6 MR. CHAMBERS: Objection, form.
7 A. Because if he's trying to negotiate an
8 excellent retirement, that means he wants him
9 gone --
10 Q. Okay.
11 A. -- after X number of months. That means
12 that he was trying to be friendly in trying to get
13 him out is what -- was how I ended up -- just
14 that -- that was my reaction at the moment and --
15 that was my reaction.
16 (Hallow Exhibit 17 was marked
17 for identification.)
18 BY MR. DICKIESON:
19 Q. All right. Let's go to the next exhibit,
20 a note to Colonel North from you. For the record,
21 Exhibit 17 is a document turned over by the NRA to
22 us, Bates-stamped No. NRA-AMC-59547. What is this
23 note to Colonel North?
24 A. The -- I at first understood in the
25 afternoon that a -- that Wayne was going to deliver

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1 a memo to -- Mr. LaPierre was going to deliver a
2 memo to Colonel North indicating that he had
3 received Colonel North's message and that he would
4 not -- the nominating committee would be -- was
5 meeting several days later and that he would not be
6 supporting his renomination for president, and at
7 the end of the day it was put in front of me to
8 sign.
9 Q. This note was put in front of you to sign?
10 A. Yes.
11 Q. Did you sign it?
12 A. Yes.
13 Q. I don't have a signature on this document.
14 MR. CHAMBERS: Objection, form.
15 MR. DICKIESON: But you signed a document
16 like this?
17 MR. COLLINS: There's another version.
18 THE REPORTER: I'm sorry. I couldn't hear
19 you.
20 MR. COLLINS: There's another version.
21 A. I signed it and I was asked to hand
22 deliver it to Mr. North, and I would not do that.
23 They -- this is primarily Josh Powell said send it
24 to him by e-mail, and I did.
25 Q. Who prepared this document?

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1 A. I'm not sure, but Josh Powell was the one
2 that put it in front of me. He had a hand in it,
3 but I'm not sure if he did that alone or not.
4 Q. Okay. For the record, this document is
5 addressed "Colonel North, I understand the messages
6 you delivered on behalf of yourself and Ackerman
7 McQueen respectively during our phone call."
8 Let me break that down. Did Colonel North
9 give you any understanding that he was speaking on
10 behalf of himself and Ackerman McQueen in that
11 phone call?
12 A. Actually, not -- I don't remember that and
13 it's not in my notes.
14 Q. Okay. And when he says "The messages you
15 delivered," is there -- is that just an improper
16 use of the word "message?" It's just one message,
17 right?
18 A. It's just one message. Okay. Yeah. It's
19 just one message.
20 Q. Did you discuss with Josh Powell how you
21 don't think that he was speaking on behalf of
22 Ackerman McQueen when he had that phone call with
23 you?
24 A. I didn't -- I just was sort of by this
25 time kind of why do I have to do this. So I really

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1 didn't look so clearly at specifically that kind of
2 detail about what the letter said.
3 Q. And Josh Powell is your boss at this time;
4 is that right?
5 A. He was chief of staff. I -- I report to
6 Wayne LaPierre.
7 Q. But you were on staff. So he's chief of
8 the staff?
9 A. Yes.
10 MR. CHAMBERS: Objection, form.
11 BY MR. DICKIESON:
12 Q. So he came to you and said sign this and
13 you signed it without a lot of thought; is that
14 correct?
15 MR. CHAMBERS: Objection, form.
16 A. I would not characterize it without a lot
17 of thought. I was reluctant.
18 Q. But you signed it anyway?
19 A. I did.
20 MR. CHAMBERS: Counsel, we're at the
21 30-minute mark from where we last picked up. I
22 think this would be a good place to stop for the
23 day.
24 MR. DICKIESON: Sure. That's fine.
25 THE VIDEOGRAPHER: We're going off the

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1 record at 6:15 p.m. This is the end of today's
2 testimony.
3 MR. COLLINS: We'd like to stay on the
4 record, but the witness and her attorneys can go.
5 We just have an issue that doesn't matter to you to
6 talk about on the record.
7 MR. CHAMBERS: In her deposition?
8 MR. COLLINS: Yes. You're welcome to
9 stay. Real quickly, Hallow Exhibit No. 4 --
10 MR. GONZALEZ: I don't think we're on the
11 record.
12 THE REPORTER: I'm sorry.
13 MR. CHAMBERS: So we'll remain on the
14 record and counsel for Ms. Hallow will stay.
15 MR. DICKIESON: I don't want to have this
16 discussion on the record and take time away from
17 what we have. I think we can go off the record and
18 discuss what you want to discuss.
19 MR. COLLINS: I just want to put on the
20 record --
21 THE WITNESS: Do you want me to go?
22 MR. CHAMBERS: We will go off the record.
23 MS. FISHER: No. They can stay on the
24 record. I just want her to leave. If this is a
25 lawyer issue, then I don't think she needs to be

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1 here.
2 MR. DICKIESON: Is this going to take more
3 than 30 seconds?
4 MR. COLLINS: It shouldn't.
5 MR. DICKIESON: Okay. Go ahead.
6 MR. COLLINS: Are we on the record now?
7 Hallow Exhibit No. 14 does not have a
8 Bates number. We saw it today produced by you
9 during this deposition. We may object to it on
10 various privilege and work product grounds. I've
11 just got to investigate. I'm sure you oppose. We
12 did probably get a version of this in our files
13 since it says Josh Powell.
14 And lastly, we designate the transcript as
15 confidential.
16 MR. DICKIESON: And, again, we oppose your
17 blanket designations of everything in the
18 transcript as confidential. And, secondly, this
19 document was not requested in your discovery
20 request. That's why it has not been produced.
21 MR. COLLINS: Okay. That's your position.
22 THE VIDEOGRAPHER: Going off the record --
23 MS. FISHER: If I could ask, is there a
24 protect- -- there's a protective order in this
25 matter, right?

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1 MR. COLLINS: Yes, there is.
2 MS. FISHER: So designating as
3 confidential means that it will be confidential
4 unless and until somebody undesignates it?
5 MR. COLLINS: No. We have an agreement
6 that for deposition transcripts so we don't spend
7 eight hours during the day, all right, designate
8 that line, designate that line. I thought we had
9 an understanding that we're going to designate the
10 whole thing and once we get the final we get two
11 weeks to say line and page.
12 MS. FISHER: And does -- does counsel for
13 Ms. Hallow have any rights under the protective
14 order --
15 MR. COLLINS: I'd have to check.
16 MS. FISHER: -- to designate?
17 MR. DICKIESON: The -- I know that Colonel
18 North's counsel took the position that it's not
19 binding on them, they can disclose whatever they
20 want to disclose, but since she's --
21 MS. FISHER: Not of her deposition?
22 MR. COLLINS: Of his.
23 MR. DICKIESON: No.
24 MS. FISHER: Of his.
25 MR. DICKIESON: Of his, but since she's an

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1 employee of the NRA, I think it's a little
2 different situation.
3 MS. FISHER: Well, she -- she has no
4 intention of disclosing anything. I'm wondering
5 whether she has rights if you all don't designate
6 or you fight over designations whether certain --
7 MR. GONZALEZ: We'll send you a copy of
8 the protective order.
9 MS. FISHER: There are certain things in
10 here that are pretty sensitive to her personally.
11 MR. DICKIESON: Sure.
12 MS. FISHER: And I want to know whether we
13 have a right as a third party to designate some
14 parts of this confidential.
15 MR. DICKIESON: Yes. The protective order
16 allows third-party witnesses to designate certain
17 things.
18 MS. FISHER: Okay. Perfect.
19 MR. CHAMBERS: Since we're on this, we'll
20 designate -- to the extent we have this right,
21 designate her Social Security number be kept
22 confidential irrespective of whether the protective
23 order is lifted. Agreement?
24 MR. DICKIESON: That's an agreement, of
25 course.

1 MS. FISHER: We may designate other things
2 too, but we'll have time because I assume we'll get
3 a transcript when you do.
4 MR. COLLINS: Of course. We'll make sure.
5 MS. FISHER: Okay.
6 THE VIDEOGRAPHER: All right. We're going
7 off the record at 6:19 p.m. This is the end of
8 today's testimony.
9 (Whereupon, at 6:19 p.m. the
10 taking of the instant
11 deposition was adjourned.)
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1 ACKNOWLEDGEMENT OF DEPONENT
2 I, MILDRED HALLOW, being first duly sworn,
3 on oath say that I am the deponent in the aforesaid
4 deposition taken on the 10th day of January, 2020;
5 that I have read the foregoing transcript of my
6 deposition consisting of pages 1 through 215,
7 inclusive, and affix my signature to same.
8
9
10 MILDRED HALLOW
11
12
13 DATE _____
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25

1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC
2 I, TINA M. ALFARO, Registered Professional
3 Reporter, Certified Realtime Reporter, and Notary
4 Public, the officer before whom the foregoing
5 deposition was taken, do hereby certify that the
6 foregoing transcript is a true and correct record
7 of the testimony given; that said testimony was
8 taken by me stenographically and thereafter reduced
9 to typewriting under my direction; that reading and
10 signing was requested; and that I am neither
11 counsel for, related to, nor employed by any of the
12 parties to this case and have no interest,
13 financial or otherwise, in its outcome.
14 IN WITNESS WHEREOF, I have hereunto set my
15 hand and affixed my notarial seal this 17th day of
16 January, 2020.
17
18
19 My Commission expires October 31, 2020.
20 *Tina M. Alfaro*
21 _____
22
23 NOTARY PUBLIC IN AND FOR THE
24 DISTRICT OF COLUMBIA
25