

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

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In Re:) **Case No. 21-30085-hdh-11**
) Jointly Administered
NATIONAL RIFLE ASSOCIATION)
OF AMERICA, et al.,) Dallas, Texas
) Tuesday, April 20, 2021
Debtors.) 1:30 p.m. Docket
)
) MOTIONS (AFTERNOON DOCKET)
)

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE HARLIN DEWAYNE HALE,
UNITED STATES CHIEF BANKRUPTCY JUDGE.

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1 DALLAS, TEXAS - APRIL 20, 2021 - 1:30 P.M.

2 THE COURT: Is everyone ready to go back on the
3 record in NRA?

4 A VOICE: Yes, Your Honor.

5 MR. MASON: Ackerman is ready, Your Honor.

6 THE COURT: All right.

7 MR. GARMAN: So are the Debtors.

8 THE COURT: Thank you. Let me start with the
9 Attorney General to see whether you're ready to rest.

10 (Pause.)

11 MS. MIRANDA: I'm sorry. Your Honor?

12 THE COURT: Yes.

13 MS. MIRANDA: Are you referring to the D.C. Attorney
14 General?

15 THE COURT: For the New York Attorney General. I
16 carried this over through the lunch hour to see if they're
17 ready to rest their case.

18 MR. VAN HORN: Your Honor, this is Eric Van Horn.
19 Can you hear me okay?

20 THE COURT: I can, thank you.

21 MR. VAN HORN: Yes, Your Honor. Eric Van Horn,
22 Spencer Fane, working with the New York Attorney General. I
23 believe Ms. Connell just joined, so she can inform the Court
24 as to whether the New York Attorney General is ready to rest.

25 THE COURT: Okay. Thank you.

1 MS. CONNELL: Thank you, Your Honor. I'm sorry I
2 was a minute or two late. We are prepared to rest, pending
3 any necessary rebuttal, Your Honor.

4 THE COURT: Okay. Thank you.

5 MS. CONNELL: Thank you.

6 THE COURT: And then, Mr. Garman, when we broke, we
7 left it up to you all to report back to us on how you wanted
8 to handle after we're done with the Ackerman part of the case
9 today.

10 MR. GARMAN: Yeah. Your Honor, I will admit it had
11 been my expectation and understanding that Ackerman was
12 calling another live witness. I'm certainly appreciative
13 that they did not.

14 I could proceed with a witness that would feel out of
15 order to me this afternoon if the Court would like me to for
16 an efficiency perspective. But my preference would be that I
17 kind of do what I typically do: evaluate everybody's cases,
18 make my final tweaks on kind of order of witnesses, and begin
19 in the morning. But I can proceed -- my preference is to
20 start in the morning, but I can proceed this afternoon
21 efficiently if called upon to do so.

22 THE COURT: Let me -- I think I'm going to let you
23 do what you want to do, Mr. Garman, so this probably won't be
24 outcome-determinative, but about how long do you think your
25 case, the NRA's case in chief, is going to take? And, again,

1 I understand --

2 MR. GARMAN: Uh-huh.

3 THE COURT: -- these things don't always work out
4 like we all expect them, including the first part of this
5 trial.

6 MR. GARMAN: Yes, sir. So, I have a current
7 rotation of approximately 11 witnesses. Most of them, I get
8 in and out of fairly quick. That certainly could grow or
9 shrink depending upon the testimony and the cross. And I
10 will tell you that my estimate is that I have two full trial
11 days, maybe two and a quarter trial days, of testimony to
12 elicit, not including any cross-examination.

13 THE COURT: Okay. That's helpful. All right. I'm
14 inclined -- well, you know, this has taken a little bit
15 longer than we thought. I think I'm inclined to let's finish
16 with Ackerman and then let you go ahead and prepare your case
17 in chief starting tomorrow morning. It's a 10:30 start.
18 It's the only other teaching day that I've got. Tomorrow's
19 the last day of class, so that's a good thing. But that
20 would be my inclination. And then everybody can get ready
21 for cross and whatever.

22 Now, who -- can you tell who the first witness is going
23 to be, so that folks can get ready for that, if we do it that
24 way?

25 MR. GARMAN: Yeah, Your Honor, sure. Your Honor, I

1 will say that I don't actually know who the first one will
2 be, but I will tell you, if I have a full day, I would hope
3 to get three witnesses in in one full day of trial, and they
4 are Plotts from Aronson, board member Tom King, and member of
5 the Special Litigation Committee, Lee, Second Vice President
6 Lee.

7 THE COURT: Okay. All right. I think that's
8 helpful --

9 MR. GARMAN: But I cannot represent I know the order
10 of how they would go yet, Your Honor.

11 THE COURT: Well, I -- if you could just let the
12 other side know that those are your first three witnesses in
13 some particular order, I think that would be helpful to them.
14 All right.

15 And so anything else from you, Mr. Garman? So that would
16 be the working model, that we'll start at 10:30 with your
17 case in chief.

18 MR. GARMAN: Yeah. No, sir.

19 THE COURT: All right. Now, --

20 MR. MASON: Your Honor, if I may, do we have --
21 because if I understand Mr. Garman, it'll be -- he'll need
22 about two and half days. Do we have days set aside next week
23 to continue?

24 THE COURT: We don't yet. I know that we can't do
25 it the first three days. So, but we -- the answer is not

1 yet.

2 MR. MASON: Okay.

3 MR. GRUBER: Your Honor, this is Mike Gruber. Can I
4 tell Mr. Garman I appreciate him sharing the witnesses with
5 us for tomorrow? I really do. Thank you.

6 THE COURT: Okay. The record notes that Mr. Gruber
7 said something awfully nice on the record.

8 MR. GRUBER: It's the first and last time, Your
9 Honor, so --

10 THE COURT: I don't believe that for a minute. I've
11 heard you say nice things before.

12 All right. Now, Mr. Mason, we've just got hot off the
13 presses your color code, so thank you for doing that.

14 MR. MASON: Absolutely. And we are ready to
15 proceed. We intend to proceed with Ms. Meadows by deposition
16 first.

17 THE COURT: All right. And have you -- did you have
18 a chance to visit with the Debtor over the break?

19 MR. MASON: We did, Your Honor. And I would like to
20 think we're probably ninety percent of the way on the same
21 page.

22 THE COURT: Uh-huh.

23 MR. MASON: For the most part, I believe that the
24 transcript that was just circulated to the Court accurately
25 reflects, you know, where we're going to be going.

1 And just for the Court's convenience, the portions in
2 yellow were designated by Ackerman and there were no original
3 objections asserted by the Debtors. The portions that you
4 have in front of you that are pink or coral are portions that
5 Ackerman designated that the NRA has asserted objections to.
6 And we will obviously want to take those up with Your Honor.
7 And then with respect to I believe the green or blueish
8 portions, I believe they're green, those are counter-
9 designations by the Debtors that we will be reading in and
10 including as we proceed through Ms. Meadows' testimony.

11 I will tell you, and I briefly spoke with Mr. Noall about
12 this, there are a few portions where Ackerman designated some
13 testimony initially, the NRA did not assert an objection to
14 that testimony on August -- I mean, I'm sorry, on April the
15 7th, and then there are some new objections that we received
16 this morning. We've tried to go ahead and work through
17 those, but there could be a few of those, and I expect Mr.
18 Noall will chime in and speak up if there's any issue on
19 that.

20 But that's kind of just how we intend to proceed. And
21 unless there's anything from the Court, we are -- we're ready
22 to go.

23 THE COURT: Let me ask you a question, just sort of
24 following up. Did we put in an order, or was this something
25 I just said on the record, on the deadline for filing

1 objections and counter-designations? I remember the counter-
2 designation part. So is there something one of my law clerks
3 can look at on the docket on a deadline for objections? Or
4 was that --

5 MR. MASON: I do not --

6 THE COURT: Okay.

7 MR. MASON: I do not recall seeing a written order.
8 I believe Your Honor mentioned it. I believe it was the
9 Thursday or Friday before we began the trial on Monday. I'm
10 sure somebody else can correct me if I'm wrong, but that's --
11 that was my recollection.

12 THE COURT: Okay. Well, we may be able to still
13 find something on it. All right. We'll just take that up
14 when we come to it.

15 All right. Are you ready to go?

16 MR. MASON: We are, Your Honor. And my colleague,
17 Kelsey Taylor, will be sitting in for Ms. Meadows.

18 THE COURT: You may proceed.

19 MR. MASON: And if we can, let's start on Page 14,
20 please.

21 CAROLYN MEADOWS, ACKERMAN MCQUEEN, INC.'S WITNESS

22 BY DEPOSITION DESIGNATIONS

23 (Deposition read.)

24 "Q Ms. Meadows, could you describe your background
25 with the NRA, your history with the NRA?

1 "A Sure. In the '90s, I did not-for-pay lobbying
2 for NRA and with the Georgia Legislature and with the
3 Congressional delegation. I actually went on the
4 board in 2003. But I knew Wayne LaPierre long before
5 that and was active.

6 "Q Can I ask you how you met Mr. LaPierre?

7 "A At a fundraising event.

8 "Q For the NRA?

9 "A Actually, for a political candidate.

10 "Q And after you met Mr. LaPierre, did you develop a
11 professional or personal relationship with him?

12 "A Professional. Yes.

13 "Q And what was that relationship? How would you
14 describe it?

15 "A Very good."

16 THE COURT: Ms. Taylor, would you mind raising your
17 volume or just speaking a little bit louder? I think it
18 would help us be able to hear you better.

19 MS. TAYLOR: Certainly.

20 MR. MASON: And we're going to jump to Page 33,
21 beginning on Line 21.

22 (Deposition read.)

23 "Q So I think you -- so I think you say you engaged
24 in meetings and phone conferences with other board
25 members and potentially other NRA employees. Is that

1 fair to say?

2 "A Yes.

3 "Q In the course of your meetings, NRA-related, or
4 your phone conferences, NRA-related, do you ever -- do
5 you make a record of those meetings or discussions,
6 such as by taking notes?

7 "A Yes.

8 "Q What is your practice? I know what my practice
9 is when I'm at the phone, but could you describe how
10 you memorialize your conversation that you might have
11 with another director or NRA employee on the phone?

12 "A I abbreviate messages.

13 "Q And do you keep a record of those messages?

14 "A I did, yes.

15 "Q Do you still have those -- the -- your notes of
16 phone calls or meetings?

17 "A No.

18 "Q What happened to them?

19 "A I destroyed them.

20 "Q When did you destroy them?

21 "A Earlier last year. Earlier in the year.

22 "Q So that would be earlier in 2019?

23 "A Yes.

24 "Q Do you know, was there a reason why you destroyed
25 those records?

1 "A I was told they could be subpoenaed and used.

2 "Q Who told you that they could be subpoenaed and
3 used?

4 "A John Frazer.

5 "Q Did he give you advice?

6 "A Yes.

7 "Q And based on that advice, did you destroy your
8 notes and records?

9 "A Yes.

10 "Q Do you know whether, at the time, NRA employees
11 or board members were under what we call retention
12 notice to preserve any documents based on
13 investigations potentially by the New York State
14 Attorney General's Office?

15 "A Yes.

16 "Q Were you under such a retention notice at the
17 time? Preservation notice?

18 "A My records were destroyed before that date.

19 "Q Before that date?

20 "A Yes."

21 MR. MASON: Kelsey, if I could ask you just to speak
22 up a little bit more. And we'll skip up to Page 38,
23 beginning on Line 14.

24 (Deposition read.)

25 "Q Okay. So notes that you would have taken about

1 meetings us within the NRA or conversations you had
2 with other NRA directors and employees were destroyed
3 in early 2019, correct?

4 "A Yes.

5 "Q So those no longer exist?

6 "A Correct.

7 "Q Did you stop taking notes after that point?

8 "A Yes.

9 "Q Okay. Did you have any concerns at that time
10 that if you destroyed those records and notes that it
11 might be considered an effort to -- and I don't mean
12 this in a -- but an effort to hide evidence that could
13 potentially be used later?

14 "A No.

15 "Q Okay. And this was after you talked to Mr.
16 Frazer?

17 "A Yes.

18 "Q Did you consult with him about whether you should
19 keep your notes?

20 "A Absolutely.

21 "Q Okay. And not -- not going into exactly what he
22 told you, but based on your conversation with him, you
23 ultimately destroyed those notes?

24 "A Yes.

25 "Q So they no longer exist?

1 "A If I destroyed them, they don't exist.

2 "Q How did you destroy them?

3 "A Some I shredded. Some I actually burned."

4 MR. MASON: If we can skip to Page 45, beginning on
5 Line 19, please.

6 (Deposition read.)

7 "Q And you have been elected consistently since
8 2003, correct?

9 "A Correct.

10 "Q What are your responsibilities as just a board
11 member of the NRA board of directors? And this is
12 kind of separate and apart from other responsibilities
13 that you might have as a member of the Audit
14 Committee.

15 "A All board members are assigned to committees by
16 the president. So they would work with those
17 individual committees.

18 "Q So you might be assigned to an individual
19 committee? When you say by the president, would that
20 be the president of the NRA, as opposed to the
21 executive vice president?

22 "A Yes.

23 "Q So at some point in time in July, Pete Brownell
24 was the president, and then Oliver North later became
25 the president, correct?

1 "A Yes.

2 "Q And they would make assignments to the committees
3 for the board members?

4 "A Yes.

5 "Q Other than the Audit Committee, what other
6 committees were you appointed to in 2018?

7 "A Finance. Audits, of course. Oh ghee (phonetic).
8 I think as president, actually, I'm an *ex officio*
9 member of all -- all the committees.

10 "Q In your current position as president of the NRA?

11 "A Correct."

12 MR. MASON: And then if we can go to Page 50,
13 beginning on Line 15.

14 (Deposition read.)

15 "Q So, for instance, are you aware of any
16 disclosures that the NRA has -- has to make to the New
17 York State authorities about, let's say, what we call
18 related-party transactions?

19 "A That is not part of my job."

20 MR. NOALL: Objection, Your Honor. I think the
21 transcript was misread by counsel.

22 THE COURT: I think so, too. I think it's
23 "contracts" instead of "transactions," Mr. Mason.

24 MR. MASON: Yep. I apologize. I'll -- let me start
25 over.

1 (Deposition read.)

2 "Q So, for instance, are you aware of any
3 disclosures that the NRA has to make to the New York
4 State authorities about, let's say, what we call
5 related-party contracts?

6 "A That is not part of my job.

7 "Q Understood.

8 "A At all.

9 "Q And so is it fair to say you are not familiar
10 with those requirements?

11 "A That would be fair.

12 "Q Whose job would that be?

13 "A The legal counsel. Secretary and treasurer.

14 "Q Okay. And just legal counsel, would that be Mr.
15 Frazer?

16 "A Correct.

17 "Q Secretary. Who would that be?

18 "A Mr. Frazer. He holds both.

19 "Q He holds both of them? And the treasurer?

20 "A Craig Spray.

21 "Q And would Mr. Woody Phillips have preceded Mr.
22 Spray as the treasurer?

23 "A Yes.

24 "Q So let me see if I can just try to put us on the
25 same page chronologically. But I think beginning in

1 July of 2018, when you became or were elected second
2 vice president of the NRA, up until April of 2019, you
3 served in that same position as second vice president,
4 correct?

5 "A Yes.

6 "Q And at some point after you became second vice
7 president, Mr. Brownell was replaced by Oliver North
8 as the president, correct?

9 "A Correct.

10 "Q But through that entire time, Mr. Childress had
11 remained as the first vice president; is that correct?

12 "A Correct."

13 MR. MASON: And then if we can skip to Page 63,
14 beginning on Line 3.

15 (Deposition read.)

16 "Q So, Mr. LaPierre told you that he was aware of
17 the fact that Lieutenant Colonel North would be
18 entering into a contract with Ackerman McQueen?

19 "A Yes.

20 "Q And what would be the purpose of that contract,
21 as far as you know, either from your discussion with
22 Mr. LaPierre, Oliver North, or anyone else? Anybody
23 else?

24 "A NRA's contractual agreement with Colonel North,
25 as an employee of Ack-Mac, would have to be -- would

1 have been to produce 12 events a year for us, for NRA
2 TV, for the *Hero* series."

3 MR. MASON: And if we could skip to Page 85, please,
4 beginning on Line 16.

5 (Deposition read.)

6 "Q Okay. Thank you. If I could take you to the
7 fourth paragraph, where it says, Whereas, the Audit
8 Committee has therefore determined that it is fair,
9 reasonable, and in the best interest of the NRA to
10 approve and ratify Lieutenant Colonel North's
11 continued participation in the AMC contract during his
12 service on the NRA board and as an NRA officer. Do
13 you see that?

14 "A Yes.

15 "Q So was that what the Audit Committee determined
16 at that time?

17 "A Yes.

18 "Q And did the Audit Committee then approve Colonel
19 North's continued participation in his contract with
20 Ackerman McQueen?

21 "A Yes.

22 "Q Even if that contract might have been a contract
23 as an employee of Ackerman McQueen?

24 "A Yes."

25 MR. MASON: I believe 19 and 20, Lines 19 and 20,

1 Ms. Taylor, on Page 86.

2 MS. TAYLOR: Apologies.

3 MR. NOALL: I'm sorry, Your Honor. So, our
4 objection here, I believe we had voiced an objection on the
5 record. And that objection, I believe, was designated. I'm
6 just checking.

7 (Pause.)

8 MR. NOALL: Our objection was to the form of the
9 question of -- actually, I'll withdraw the objection, Your
10 Honor.

11 THE COURT: Thank you, Mr. Noall.

12 MR. MASON: Let's -- let's go back --

13 THE COURT: Yes. I think --

14 MR. MASON: -- to Page 86, Line 12, if we can.

15 (Deposition read.)

16 "Q Even if that contract might have been a contract
17 as an employee of Ackerman McQueen?"

18 MS. TAYLOR: And I'll just note that it looks like
19 Lines 19 and 20 are still part of the question that was
20 repeated.

21 MR. MASON: Oh, yeah, I apologize. You are right
22 and I am wrong.

23 (Deposition read.)

24 "Q Even if the contract meant that Oliver North was
25 an employee of Ackerman McQueen?"

1 "A Yes."

2 MR. MASON: If we could fast-forward to Page 109,
3 please, Line 20.

4 (Deposition read.)

5 "Q How did Bill Brewer come to be picked, do you know?

6 "A Yes.

7 "Q How -- how did he come to be picked?

8 "A He was chosen by Wayne LaPierre at the
9 recommendation of Steve Hart.

10 "Q And when it says, did he reveal relationship to
11 Angus McQueen, what relationship did Bill Brewer have
12 to Angus McQueen?

13 "A Father-in-law."

14 MR. MASON: And then it goes down to say:

15 (Deposition read.)

16 "Q Did he disclose his ethics problems in Texas? Do
17 you have any information about Mr. Brewer's ethical
18 problems in Texas?

19 "A Only what was in the New York Times."

20 MR. MASON: And if we go to Page 114, beginning on
21 Line 19.

22 (Deposition read.)

23 "Q So, Ms. Meadows, if -- and forgive me for this,
24 because I don't want to misstate anything that you
25 might have said before, but I think you indicated that

1 when we looked at that agenda for October 24th, which
2 was some months ago, before this February memo, that
3 Lieutenant Colonel North raised some questions about
4 Bill Brewer. Is that fair to say?

5 "A Yes.

6 "Q So, even at that time, in October of 2018,
7 Lieutenant Colonel North had concerns about Mr.
8 Brewer?

9 "A Yes.

10 "Q Can you tell us at that point, and let's say back
11 in the fall of 2018, when you had that meeting, what
12 were Lieutenant Colonel North's concerns about Mr.
13 Brewer?

14 "A In the October meeting --"

15 MR. NOALL: Your Honor, and this is a place where we
16 objected in our designations to speculation. And calling for
17 improper opinion.

18 THE COURT: Response, Mr. Mason?

19 MR. MASON: Your Honor, I'm looking at their
20 designations right now and their objections, and there's no
21 objections identified. Including with what they filed this
22 morning.

23 MR. NOALL: Then I'll withdraw that, Your Honor.

24 THE COURT: Thank you, Mr. Noall.

25 MR. MASON: And let me -- I'm going to go back to

1 Line 11.

2 (Deposition read.)

3 "Q Can you tell us at that point, and let's say back
4 in the fall of 2018, when you had that meeting, what
5 were Lieutenant Colonel North's concerns about Mr.
6 Brewer?

7 "A In the October meeting, I don't know. But
8 leading up to this, it strictly had to do with the
9 amount of money.

10 "Q But did he express to you that he was concerned
11 about the amount of money that was being paid to the
12 Brewer firm?

13 "A Yes.

14 "Q So this, if we look at this exhibit, it appears
15 to be a letter addressed Mr. LaPierre, and it is dated
16 -- the signatures are dated February 26, 2019. It
17 reads, The elected non-salaried officers have met and
18 determined that we have fiduciary obligations that
19 need to be urgently addressed with you, and, if you
20 wish, with Mr. Brewer. We have determined that the
21 retainer agreement dated 7 March 2018 with Brewer,
22 Attorneys and Counselors, is not properly executed and
23 is not, therefore, valid.

24 It then goes on to say at the end, In order to
25 comply with our own rules and nonprofit law in New

1 York, we insist that no invoices payable to Brewer,
2 Attorneys and Counselors, be paid for services
3 rendered after 28 February 2019.

4 It is then -- it appears to be signed by
5 Lieutenant Colonel North, Mr. Childress, and you. Did
6 you sign this document?

7 "A Actually, yes.

8 "Q Okay. And can you tell us why you signed it?

9 "A I wish I could. No. Strike that. It -- I -- I
10 agreed that more information should be forthcoming.
11 Later, I would not have signed this.

12 "Q But at this time, you did believe that more
13 information, presumably about the Brewer law firm
14 fees, should be forthcoming to the officers?

15 "A Yes.

16 "Q Did you feel that as part of the member" -- "as"
17 --

18 MR. MASON: I'm sorry. Let me start over.

19 (Deposition read.)

20 "Q Did you feel that, as part of the -- member of
21 the Audit Committee, that the Audit Committee should
22 also be aware of the fees that were being charged by
23 the Brewer law firm?

24 "A Yes.

25 "Q And was the Audit Committee given information

1 about the fees being charged by the Brewer law firm?

2 "A When?

3 "Q At this time.

4 "A Not to my knowledge.

5 "Q For instance, were invoices from the Brewer law
6 firm ever shared with the officers, yourself, Mr.
7 Childress, or Lieutenant Colonel North?

8 "A No.

9 "Q Why not?

10 "A That is not our job.

11 "Q What harm would it be to have you be able to --
12 for the president, the vice president, and the second
13 vice president to be able to look at the invoices and
14 see what they said?"

15 MR. NOALL: Objection. Misleading, and it's vague
16 and ambiguous.

17 MR. MASON: Your Honor, I don't believe it's
18 misleading at all. I think it's asking for an opinion. The
19 objections that were previously asserted were speculation and
20 an improper opinion, but I think that Ms. Meadows, as an
21 officer of the NRA, can -- can answer the question as to what
22 harm it would have caused, if any, just to look into these
23 issues.

24 THE COURT: Overruled.

25 (Deposition read.)

1 "A I don't know that they -- I don't know that there
2 would have been harm. Where it says unpaid people who
3 meet irregularly, that is not part of what we do. We
4 have good people who look at that and advise.

5 "Q And as officers of the NRA, do you agree that you
6 have fiduciary duties to make sure that the NRA is,
7 for lack of a better term, doing the right thing?

8 "A Absolutely."

9 MR. NOALL: We have an objection here, Your Honor.
10 It's calling for a legal conclusion.

11 THE COURT: Sustained as to legal conclusion, but
12 the witness may give her understanding, if she has one. And
13 she has answered the question, "Absolutely."

14 MR. MASON: If we could then jump to Page 123,
15 beginning on Line 19.

16 (Deposition read.)

17 "Q The first page appears to be an email that, on
18 March 22, 2019, that Lieutenant Colonel North sent to
19 John Frazer. It says, Subject: Confidential
20 Documents. And then it seems to have two attachments,
21 one entitled "Letter to Brewer, March 22, '19," and
22 then "Memo to the Audit Committee." And I believe
23 those are the attachments that have been included.
24 But he, in the email, Mr. North says, "John, Please
25 find attached two confidential documents from the NRA

1 board's three elected officers for urgent transmission
2 to the NRA Audit Committee and the Brewer, Attorneys
3 and Counselors." And then he describes both as being
4 confidential. If you look at the first of these
5 attached documents, it does appear to be a March 22,
6 2019 letter to William Brewer, and it does seem to be
7 signed by Lieutenant Colonel North, Mr. Childress, and
8 yourself.

9 Let me ask you, did you sign this letter?

10 "A Oh, it was electronically signed.

11 "Q Did you approve having your name assigned to this
12 letter?

13 "A On the day, March 22nd, yes.

14 "Q Okay.

15 "A But I later rescinded it.

16 "Q Understood. But on March 22nd, you did give
17 approval to Lieutenant Colonel North to sign your name to
18 this letter on that Friday, March 22nd?

19 "A I had a telephone."

20 THE COURT: Hold on.

21 MS. TAYLOR: (reading) "He called me."

22 THE COURT: Hold on. Mr. Noall, I think there's a
23 -- the next part is marked as an objection is pending. Do
24 you have an objection?

25 MR. NOALL: I do not have an objection at this

1 point, Your Honor. I'll withdraw it. It's -- my objection
2 is actually a little bit later on in this section.

3 THE COURT: Okay. Thank you, Mr. Noall.

4 (Deposition read.)

5 "A I had a telephone. He called me. I was in rural
6 Alabama on the way to my granddaughter's wedding. We
7 were cut off three times. I could not understand. I
8 didn't -- based on what he said to me, I said he could
9 use the electronic signature. By the following
10 Monday, when I had it read to me, I talked to John
11 Frazer and asked that my signature be removed, and it
12 was done.

13 "Q Okay. So, based on the information that you had
14 on Friday, you did give him approval to put your name
15 on this?

16 "A Yes.

17 "Q He didn't do it without your approval?

18 "A Yes.

19 "Q And as you read the letter, it is addressed to
20 Mr. Brewer, correct?

21 "A Correct.

22 "Q And then it seems to be asking first that Mr.
23 Brewer give -- provide the NRA with separate
24 engagement letters for each matter that Mr. Brewer is
25 handling for the NRA. Do you see that?

1 "A Yes.

2 "Q And then it describes, I think, A through F, at a
3 minimum, what these separate engagement letters and
4 budgets should cover. Do you see that?

5 "A Yes.

6 "Q Do you see any problem with requesting that kind
7 of information from Mr. Brewer?

8 "A Yes.

9 "Q Why?

10 "A We have legal people in-house, treasurers, people
11 who are employees, that EVP and -- that would be their
12 job to do this.

13 "Q But if the president of the NRA felt that he had
14 a fiduciary duty to look into this for whatever
15 reason, whether it is -- you know, ultimately turns
16 out to be wrong or right, why wouldn't he have the
17 authority, if not the obligation, to ask for this
18 information for himself and make sure it looked okay
19 to him?"

20 MR. NOALL: Objection. Calls for speculation.

21 Calls for a legal conclusion.

22 MR. MASON: Your Honor, I believe that Ms. Meadows,
23 especially given the fact that at the time she gave this
24 deposition was the acting president of the NRA, can answer a
25 question about what is and is not appropriate for an NRA

1 president to be doing.

2 MR. NOALL: Your Honor, she was not the president at
3 the time, and this is speculating. And this whole -- all
4 this testimony is with respect to Mr. North.

5 MR. MASON: He was the president at the time of this
6 deposition she gave, and she should be able to opine as to
7 what is and is not appropriate for an NRA president to do or
8 not do, even if when these actions were taken she was not the
9 acting president.

10 THE COURT: Sustain the objection.

11 MR. MASON: Let's go to Page 140, please, beginning
12 on Line 4.

13 (Deposition read.)

14 "Q He also says you were a full-throated supporter
15 of Wayne LaPierre's leadership; is that true?

16 "A Yes.

17 "Q Does that continue to be true today?

18 "A Absolutely.

19 "Q Why are you a full-throated supporter for Wayne
20 LaPierre's leadership?

21 "A Having known him for 25 years, his track record
22 has never wavered from his mission, which is my
23 mission, I support.

24 "Q What is the role of the executive vice president
25 of the NRA?

1 "A That of a CEO. Run the company."

2 MR. MASON: If we can skip to Page 142, please,
3 beginning on Line 3.

4 (Deposition read.)

5 "Q Do you, as the president, have the same authority
6 as Mr. LaPierre?

7 "A Absolutely no.

8 "Q And can you describe -- can you explain that a
9 little bit more?

10 "A Well, it was never -- the NRA was never intended
11 to operate that way. I am an unpaid volunteer and I
12 am infrequently at headquarters, so it just wouldn't
13 work. You have to have a leader who takes care of
14 day-to-day operations.

15 "Q And in this case, that is Mr. LaPierre?

16 "A Yes.

17 "Q And Mr. LaPierre is a compensated employee; is
18 that correct?

19 "A Correct."

20 MR. MASON: There is a notation for Meadows' Exhibit
21 5 that was marked for identification on Page 143. And I'll
22 just note for the record that's already been admitted as
23 Ackerman 38.

24 Moving down to Page 144, beginning on Line 20.

25 (Deposition read.)

1 "Q I know this is lengthy. Before I waste your time
2 spending a lot of -- a lot of time reviewing, are you
3 familiar with this letter?

4 "A Yes.

5 "Q Okay. So you've seen it before?

6 "A I don't think I saw all of it, flipping through
7 here.

8 "Q And just for the record, it appears to be a
9 letter dated April 18, 2019 to John Frazer and Charles
10 Cotton.

11 "A Correct.

12 "Q And then it is signed by, in this case, Mr. North
13 -- by Mr. North and Mr. Childress. Could I ask you a
14 quick question about Richard Childress? At some point
15 before this, I think you had indicated that you had
16 rescinded your signature from some of the letters
17 dealing with the Brewer law firm. It -- what -- did
18 you have any knowledge of what Mr. Childress's view of
19 the invoices of the Brewer law firm was?

20 "A Yes.

21 "Q What was his view?

22 "A He agreed with Colonel North. I did hear him say
23 that."

24 MR. MASON: And then moving over to Page 147,
25 beginning on Line 13.

1 (Deposition read.)

2 "Q The first paragraph says, as indicated in
3 previous correspondence, we and others continue to be
4 deeply concerned about the extraordinary legal fees
5 for the NR -- the NRA has incurred with Brewer,
6 Attorneys and Counselors. The amount appears to be
7 approximately \$24 million over a 13-month period, \$5
8 million of which apparently has been reimbursed in
9 connection with the Lockton settlement. If you talk
10 about \$24 million over 13 months, that is
11 approximately a little bit over one year. Did you
12 view \$24 million in legal fees for a period of 13
13 months to be a substantial amount of money?

14 "A The question is not correct.

15 "Q I'm sorry, please -- did I -- if I misstated
16 something, --

17 "A The letter, that is not a correct quote, \$24
18 million in a 13-month period.

19 "Q Okay. Why is -- not correct?

20 "A Because it was longer.

21 "Q Could I take you to the second page? It seems to
22 have a chart that describes -- that says, based on
23 information provided to us over a months -- over a
24 month ago by our secretary and general counsel. I
25 assume that is Mr. Frazer?

1 "A Yes.

2 "Q The first 12 invoices the NRA received from the
3 Brewer firm were for these amounts. And then it has a
4 chart from March 2018 through February 2019, which
5 would be 12 months, listing the amount for each month,
6 and it totals a little over \$19 million. From your
7 understanding, is that a correct figure?

8 "A I would say the payment would have been correct.

9 "Q So that is one year, \$19 million. Was that
10 correct, that it appears that Mr. Brewer was paid \$19
11 million over the course of one year?

12 "A Correct.

13 "Q What is the annual -- annual budget of the NRA,
14 do you know?

15 "A No.

16 "Q Is this a significant amount of money?

17 "A I know, but I can't come up with -- I mean, I
18 just --

19 "Q I understand.

20 "A Okay.

21 "Q And that, look, we -- we are asking you to be
22 accurate. So if you can't recall the number, then --

23 "A No.

24 "Q -- that is a completely appropriate answer. So,
25 did you view \$19 million over a one-year period as a

1 substantial amount of money for the NRA?

2 "A Yes.

3 "Q If I could take you to the third page under the
4 title, it says second -- it says, we and others have
5 made multiple requests and recommendations for an
6 outside independent review of the Brewer firm's
7 invoices. All of these requests have been denied.
8 The secrecy surrounding these large invoices causes
9 suspicions and raises questions.

10 And then it goes on to say, on the advice of our
11 board counsel that it was our fiduciary duty to do so,
12 we have made the following requests regarding the
13 Brewer invoices. And then he lists what appear to be
14 a series of requests. When he -- when the letter
15 refers to board counsel, do you know who they are
16 referring to?

17 "A Steve Hart.

18 "Q And is this -- were you aware of the fact that
19 Steve Hart had advised Lieutenant Colonel North and
20 Mr. Childress that they had a binding fiduciary duty
21 to make requests regarding the Brewer invoices of NRA
22 leadership?"

23 MR. NOALL: And Your Honor, this, I raised an
24 objection in my designations that it calls for speculation
25 and potentially hearsay.

1 MR. MASON: Your Honor, I don't believe it would be
2 hearsay. I believe it would be an admission by a party
3 opponent.

4 THE COURT: What about speculation?

5 MR. MASON: Well, I mean, he's asking whether or not
6 he was aware of the -- of that fact. I think he can -- he
7 can answer whether or not he's aware of it or not. I don't
8 think he's speculating. He either -- he either is or he's
9 not aware.

10 THE COURT: Overruled.

11 (Deposition read.)

12 "A I don't know what he advised them to do. No, he
13 suggested it to me also.

14 "Q Mr. Hart suggested that there be an examination
15 of these invoice?

16 "A Yes.

17 "Q As described in a latter -- and am I correct
18 based on your previous answers that you did not agree
19 with that?

20 "A That is correct.

21 "Q Thanks. I don't believe I have other questions
22 on -- maybe I could just ask you a couple of
23 questions. Are you -- do you know how much the Brewer
24 law firm is charging the NRA now on a monthly basis?

25 "A I do not.

1 "Q As the president, are you -- is that something
2 you would like to know or should know?

3 "A Well, I have been told. I just cannot tell you.
4 I'm not sure I -- if I recall whether or -- I would be
5 able to tell you that.

6 "Q So you have been told, but you simply don't
7 recall that amount --

8 "A Yes.

9 "Q -- the -- that amount? Do you examine the
10 invoices at all?

11 "A No."

12 MR. MASON: Then if we could go to Page 158, please,
13 beginning on Line 1.

14 (Deposition read.)

15 "Q So, for example, the description of two hundred
16 and some thousand dollars of expenditures at -- I
17 don't know how to say that -- Ermenegildo Zegna
18 clothing store, I don't know that I have said it --
19 said that the right way, but that was not of concern
20 to you?

21 "A No.

22 "Q And why not?

23 "A Over a 17-year period, for the clothes that the
24 CEO, the standard-bearer for the NRA, should have, I
25 do not find it excessive.

1 "Q Have you ever been in any kind of employment
2 where your employer has paid for your clothing?

3 "A No.

4 "Q Do you think it was appropriate for the NRA to be
5 paying for the clothing for Mr. LaPierre?

6 "A Under the circumstances, yes."

7 MR. MASON: If we can jump to Page --

8 MR. NOALL: Your Honor and Counsel, may I have just
9 one moment? I need to plug my computer in so it doesn't die.
10 I'll just be one second.

11 THE COURT: Sure, Mr. Noall.

12 MR. MASON: And while he's doing that, we'll be
13 going to Page 170 next.

14 MS. TAYLOR: May I ask if my sound is any better? I
15 tried to tweak my settings.

16 THE COURT: From our perspective, I think it's
17 better.

18 MR. MASON: That's the only perspective that
19 matters.

20 (Pause.)

21 MR. NOALL: Thank you, all.

22 MR. MASON: Okay. Beginning back on Page 170, Line
23 12.

24 (Deposition read.)

25 "Q The -- were you at least an -- an ear-witness to

1 a conversation that Ms. Hallow had with Lieutenant
2 Colonel North?

3 "A Yes.

4 "Q Could you describe the -- what led up to that
5 conversation?

6 "A Yes. For whatever reason, Wayne LaPierre was
7 using Millie's phone while he was on the phone. He --
8 I was there. Actually, he was on the phone.

9 "Q And were you all -- were you all at the -- and
10 where were you all at that point?

11 "A We were in Wayne LaPierre's suite. We had moved
12 from Ollie's.

13 "Q I see. And could I stop you there for a moment?
14 Between the time that you learned from Millie about
15 the Boren call and now, which is later in the
16 afternoon, had you had any discussions with Mr.
17 LaPierre about what had occurred?

18 "A Yes.

19 "Q What were those discussions with Mr. LaPierre?

20 "A It was whether or not a coup was coming about, if
21 there would be a vote at the board meeting to remove
22 him, and that it would be wise of us to get in touch
23 with board members that would support Wayne.

24 "Q So is this one of the things that you had been
25 doing up until this point, contacting board members to

1 see if they would support Mr. LaPierre?

2 "A Yes. I actually asked them to come to an
3 informal meeting.

4 "Q And this would be some board members among the
5 entire 76 that made up the board at the time?

6 "A Yes.

7 "Q What was Mr. LaPierre's reaction to what he had
8 heard Millie Hallow say about Dan Boren?

9 "A Disappointment. Hurt."

10 MR. MASON: Mr. Noall, I believe we've got Lines 12
11 and 13 designated here. I don't know if that's my error or
12 you all's, but is that -- I assume you're not wanting to read
13 those lines in?

14 MR. NOALL: That was an error, that's correct.

15 MR. MASON: If we could please jump now to Page 189,
16 beginning on Line 9.

17 (Deposition read.)

18 "Q I would like to show you Exhibit 13. So -- and
19 actually, before I ask you to take a close look at
20 that, Ms. Meadows, what did happen after Oliver North
21 -- after the Oliver North phone call on April 24th?
22 What happened at the meeting, as you recall? Was
23 there a vote by the board directors regarding Mr.
24 LaPierre?

25 "A No.

1 "Q And why not? Why did that not happen?

2 "A It didn't come up.

3 "Q Do you know why it didn't come up?

4 "A Ollie North forces didn't have the votes and they
5 knew.

6 "Q I'm sorry, the Ollie North what?

7 "A The Ollie North people. Ollie did not have the
8 votes on the board.

9 "Q So he did not have enough support on the board to
10 bring this to a vote?

11 "A No, not even close. No.

12 "Q And ultimately, Oliver North -- ultimately, Wayne
13 LaPierre issued a public statement to the board about
14 this, right?

15 "A Yes.

16 "Q And ultimately, Oliver North resigned as
17 president?

18 "A He just didn't run again.

19 "Q Why was that, do you know?

20 "A He knew he wouldn't be elected.

21 "Q So at this point, based on what had -- what had
22 -- so at this point, based on what had occurred, he
23 would not have enough support on the board to be
24 reelected president?

25 "A Correct.

1 "Q And is that because Mr. LaPierre would not be
2 supportive of Mr. North as continuing in another term
3 as president?

4 "A It really wouldn't have anything to do with
5 Wayne. The board at this point would not.

6 "Q Would not have voted in favor of?

7 "A To support Colonel North.

8 "Q Okay. Let me ask you -- with that background,
9 let me ask you to take a look at -- so how did it
10 become, then, that you were the lucky person to assume
11 the presidency?

12 "A I was drafted.

13 "Q Who drafted you?

14 "A A committee of board members just sat down with
15 me and said, you are it. In this time, in what is
16 going on, you are our person.

17 "Q Okay. And was it at that meeting in Indianapolis
18 that you were elected president?

19 "A Yes."

20 MR. MASON: If we can go to Page 197, please,
21 beginning on Line 4.

22 (Deposition read.)

23 "Q So, just to be clear, do you have any
24 recollection of Colonel North saying that he was
25 acting on behalf of anyone at Ackerman McQueen?

1 "A He did not say it in --"

2 MR. NOALL: Your Honor, I object on the basis of
3 hearsay to this question.

4 MR. MASON: Your Honor, I don't believe that, number
5 one, it is hearsay. Colonel North was the president of the
6 NRA at that time. I understand there's been some testimony
7 about him being an employee of Ackerman as well, but there is
8 absolutely no evidence, and Colonel North testified to this,
9 that he was acting on behalf of or doing anything with
10 respect to being an employee of Ackerman.

11 And this goes to one of the -- the heart of the issue as
12 to, you know, this extortion phone call and whether, you
13 know, Ackerman was relaying any threats or extortion or coup.

14 So I think it also has to do with the existing state of
15 mind, to the extent the Court finds it's hearsay. And I
16 think it also has to do with the effect on the listener as
17 well and what actions were taken with respect to this.

18 THE COURT: At the time that this --

19 MR. NOALL: And again, --

20 THE COURT: Could I just ask a question? At the
21 time that this statement was allegedly made, Colonel North
22 left as president of the NRA?

23 MR. MASON: Colonel North was president of the NRA
24 when this alleged statement was -- let me say it a different
25 way. When the alleged coup was going on, Colonel North was

1 president of the NRA.

2 THE COURT: Okay. Mr. Noall, you were going to say
3 something. I think I stepped on whatever it was.

4 MR. NOALL: So, Your Honor, no problem. I still
5 object because I don't think it's clear here when the
6 question -- at what time the question was being asked. It
7 wasn't clear from the question. And I don't think it goes to
8 state of mind. I think this is a question of whether or not
9 this just is asking for a hearsay response at any time about
10 the truth of the matter asserted.

11 THE COURT: Overruled.

12 (Deposition read.)

13 "A He did not say it in your words, no.

14 "Q Okay. Did he ever say in the conversation you
15 overheard that he was acting at the direction or
16 instruction of anybody at Ackerman McQueen?

17 "A I would say no.

18 "Q Did he ever say that he had discussed this
19 ultimatum with anybody at Ackerman McQueen?

20 "A No."

21 MR. MASON: If we can go to Page 208, Line 21.

22 This was a counter-designation by the Debtors that is
23 just the answer. So I would say that -- I mean, to the
24 extent that the Debtors would like 21 and 22 read in, I think
25 the original question needs to be read in.

1 MR. NOALL: I agree, Your Honor. I think that it
2 would be appropriate to read the original question in, down
3 through the answer.

4 THE COURT: Starting at Line 4, you think, Mr.
5 Noall?

6 MR. NOALL: Yes, sir.

7 THE COURT: Okay. Why don't you read the question,
8 Mr. Mason, and let the witness answer at Line 21.

9 MR. MASON: Your Honor, it appears that there may be
10 a couple questions, so do you -- what if we just start from
11 Line 4 and just go through 22? Would that be agreeable, Mr.
12 Noall? And Your Honor?

13 MR. NOALL: I think that's appropriate. I think
14 that's what's necessary.

15 MR. MASON: Okay. So, beginning on Line 4.

16 (Deposition read.)

17 "Q Sure. And somebody may say to me, Dave, go to
18 Brooks Brothers and get fitted for clothes. I still
19 pull out my Schertler & Onorato credit card to pay for
20 it. I don't pull out the credit card belonging to
21 somebody else to pay for it. Why would there be an
22 arrangement that Wayne LaPierre's clothing purchases
23 at an expensive store in Beverly Hills be done through
24 a -- through Ackerman McQueen, as opposed to just
25 directly billing the NRA for it?

1 "A Because -- I -- I do know. Because Ackerman
2 McQueen, as I said, made the appointment."

3 MR. MASON: Then if we could jump forward to Page
4 223, beginning on Line 10.

5 (Deposition read.)

6 "Q Okay. We have talked a little bit about Millie
7 Hallow. How long have you known Ms. Hallow?

8 "A As best as I remember, since 1990.

9 "Q 1990?

10 "A Yes.

11 "Q Is that when she began working with the NRA or
12 was that before?

13 "A I don't know that. That was not the capacity I
14 met her in.

15 "Q What capacity did you meet her in?

16 "A I knew her husband.

17 "Q What was her husband -- she has had a couple of
18 husbands.

19 "A Number four, Ralph Z. Hallow.

20 "Q And how did you know him?

21 "A Journalist.

22 "Q And so you met her independently at the NRA?

23 "A Yes.

24 "Q Through her husband?

25 "A Yes.

1 "Q Are you aware of when she began working with the
2 NRA?

3 "A In the '90s. I don't know exactly when.

4 "Q And is it fair to say you had no involvement in
5 her hiring with the NRA?

6 "A No.

7 "Q Did you ever become aware of the fact that she
8 has been convicted of a felony embezzlement charge
9 here in the District of Columbia?

10 "A Yes.

11 "Q When did you become aware of that?

12 "A I'm not sure of the date, but it would have been
13 at least 10 years ago.

14 "Q How did you become aware of that?

15 "A She told me.

16 "Q Are you aware of situations in which her personal
17 expenses were being paid by the NRA?

18 "A I am now.

19 "Q What are you aware of now, if you can tell us?

20 "A That she did make a charge on her NRA credit
21 card.

22 "Q Do you know what that charge was for?

23 "A Clothes.

24 "Q And do you know when that occurred?

25 "A I do not.

1 "Q Do you know if any action has been taken against
2 Ms. Hallow with respect to that personal charge?

3 "A I do not know. I do not know if any action was
4 taken or was not taken.

5 "Q Would it have been appropriate to take some
6 action against an employee who charged personal
7 expenses on an NRA charge card?

8 "A Well, that would have been up to Wayne LaPierre
9 and HR. It is my understanding she paid it back.

10 "Q Okay. We -- we have talked a little bit about
11 Steve Hart. What was your understanding as to who
12 Steve Hart represented?

13 "A The 76 board members.

14 "Q So you under -- so your understanding, he was
15 counsel to the NRA board?

16 "A Yes.

17 "Q And not the NRA itself?

18 "A Do you mean the five million NRA members?

19 "Q No. So, --

20 "A What do you mean?

21 "Q So, for instance, let's talk about John Frazer
22 for a minute. Mr. Frazer is general counsel for the
23 NRA, correct?

24 "A Correct.

25 "Q And would Mr. Frazer advise NRA management on

1 legal issues?

2 "A Yes.

3 "Q Would -- so do you view Ms. Hart's role -- Mr.
4 Hart's role as being counsel for the NRA board
5 different than Mr. Frazer's role as counsel for NRA
6 management?

7 "A I perceive it as being different.

8 "Q In the sense that Mr. Hart exclusively advised the
9 board on board issues?

10 "A Yes.

11 "Q And are -- as a board member, did you feel that
12 you could seek advice from Mr. Hart?

13 "A Originally yes, but later no."

14 MR. MASON: Then if we go down to Page 228,
15 beginning on Line 22.

16 (Deposition read.)

17 "Q Could you explain about your concern about his
18 loyalty?

19 "A Toward the end of his employment with NRA, it
20 became apparent to me that he was not looking out for
21 the best interests of NRA, but, in fact, for Ollie
22 North.

23 "Q What gave you that impression, can you tell us?

24 "A He talked badly about Brewer. Started talking
25 badly about Wayne.

1 "Q Can you be -- to the extent you are able to, can
2 you be a little bit more specific? What did Mr. Hart
3 say about Mr. Brewer and then what did Mr. Hart say
4 about Mr. LaPierre?

5 "A I could, yes.

6 "Q Would you?

7 "A Yes.

8 "Q Thanks.

9 "A He -- although he recommended the Brewer firm to
10 Wayne LaPierre for employment, he, in the later
11 employment of Hart's career, said that he was charging
12 too much and that he thought he should go.

13 "Q Based upon the fact that Mr. Hart came to a
14 similar conclusion as Lieutenant Colonel North that
15 the Brewer firm was charging too much?

16 "A Well, that is what he said, yes.

17 "Q What about Mr. LaPierre?

18 "A He, in the last maybe two months before he left,
19 was saying that Wayne should go.

20 "Q Did he say that to you?

21 "A Yes.

22 "Q Did he say why he thought Wayne should go?

23 "A He -- yeah.

24 "Q What did he say?

25 "A That he felt like his time was past and that he

1 should go, and probably other things that I don't
2 remember."

3 MR. MASON: Go over on Page 231, Line 22.

4 (Deposition read.)

5 "Q Did -- was it Mr. LaPierre who decided to
6 terminate Mr. Hart?

7 "A I believe so.

8 "Q Were you consulted?

9 "A Yes.

10 "Q And by Mr. LaPierre?

11 "A Yes.

12 "Q And about terminating Mr. Hart?

13 "A Yes.

14 "Q Before the decision was made?

15 "A Yes."

16 MR. MASON: And then we'll go to Page 233, beginning
17 on Line 12.

18 (Deposition read.)

19 "Q As the NRA president, current president of the
20 NRA, are you aware of the investigation that's being
21 conducted by the New York State Attorney General with
22 respect to the NRA?

23 "A Yes.

24 "Q And are you aware of the fact that the NRA has
25 received a number of subpoenas for documents from the

1 New York State Attorney General, correct?

2 "A Yes.

3 "Q And what is your understanding of the nature of
4 that investigation, if you know?

5 "A Harassment.

6 "Q That is what every client says. Do you know what
7 they claim -- do you know what they claim they are
8 investigating?

9 "A Yes.

10 "Q What is it?

11 "A It would be having to do with being the (c) (4).

12 "Q So whether you are doing what the rules and
13 regulations -- whether the NRA is doing what the rules
14 and regulations require in order to maintain that
15 501(c) (4) status?

16 "A Correct."

17 MR. MASON: And if we can jump to Page 241,
18 beginning on Line 21.

19 (Deposition read.)

20 "Q What do you know about Chris Cox being part of a
21 Ackerman/North/Boren conspiracy?

22 "A At 4:00 o'clock on April 24th, at the request of
23 Chris Cox, Wayne LaPierre and I met with him and he
24 pretty much parroted what Dan Boren had said earlier
25 in that day and what Ollie North had said. And for

1 about 25 minutes he was telling Wayne why he should
2 resign and that, if he didn't, everything that he had
3 done in his 38 years at NRA would be smeared in every
4 paper in the country and he has -- his family would be
5 humiliated.

6 "Q And so that was the -- and so where did Mr. Cox
7 get this information, did he say?

8 "A What do you mean? What information?

9 "Q So, when he was providing information in this 25-
10 minute conversation about the bad things that would
11 happen to Wayne LaPierre, where did Mr. Cox obtain the
12 information? Did Mr. Cox say where he obtained the
13 information that he was saying would hurt Mr.
14 LaPierre?

15 "A He did not say.

16 "Q But if -- but if that was the same day, he was
17 not fired?

18 "A He quit.

19 "Q But he didn't quit until two months later?

20 "A Are you asking me?

21 "Q Let me think about it. The -- do you know when
22 Mr. Cox resigned?

23 "A I don't know the date, no.

24 "Q Do you know why Mr. Cox resigned?

25 "A Because the scheme he had been involved in

1 failed."

2 MR. MASON: Page 250, Line 5.

3 (Deposition read.)

4 "Q And are you aware that Wayne LaPierre flies in a
5 private jet?

6 "A Yes."

7 MR. MASON: Page 252, Line 20.

8 (Deposition read.)

9 "Q Do you know what the cost of Wayne LaPierre's
10 security measures cost the NRA?

11 "A No.

12 "Q Are you aware that over -- that his private jet
13 travel costs over \$1 million per year?

14 "A Yes."

15 MR. MASON: And then if we can go to Page 259,

16 beginning on Line 14.

17 (Deposition read.)

18 "Q Okay. And you have testified earlier that every
19 NRA contract greater than \$100,000 you have to sign
20 off on; is that correct?

21 "A Two of the three officers --"

22 MR. NOALL: Objection to the form of the question as
23 being vague and ambiguous.

24 THE COURT: Overruled.

25 MR. NOALL: With respect to the --

1 THE COURT: Go ahead. Go ahead.

2 (Deposition read.)

3 "A Two of the three officers, president and the two
4 vice presidents, must sign off.

5 "Q Okay. So Mr. LaPierre is one of those officers?

6 "A No. It would be me, first vice president, second
7 vice president. He doesn't sign off on all of them.

8 "Q Okay. And who are the other two vice presidents
9 at present?

10 "A First vice president, Charles Cotton. Second
11 vice president, Willes, W-I-L-L-E-S, Lee.

12 "Q And are they located in the Washington, D.C.
13 area?

14 "A Lee is. Colonel Lee. Alexandria, I think, would
15 be his address. At any rate, he is in Virginia.

16 "Q What about Charles Cotton?

17 "A He is Texas, near Houston.

18 "Q And so do you sign off on most of the contracts
19 over \$100,000?

20 "A I have signed off on all of them that has come my
21 way.

22 "Q Generally, all three sign?

23 "A Yes.

24 "Q And we have heard testimony that the Brewer law
25 firm has separate contracts for as many as 12

1 different areas of legal work. Have you signed off on
2 each of those 12 retainer agreements?

3 "A No."

4 MR. NOALL: Your Honor, with respect -- we object to
5 this question because it makes a statement, a hearsay
6 statement, what they have heard, and there's nowhere in the
7 record where this statement came from.

8 MR. MASON: I believe, Your Honor, there's already a
9 bunch of evidence in the record about the various engagements
10 and work that the Brewer firm has handled for the NRA the
11 last few years.

12 MR. NOALL: But not with regard to this witness on
13 this deposition, Your Honor.

14 THE COURT: I think this question does call for
15 hearsay as asked.

16 MR. MASON: Go down to Line 12.

17 (Deposition read.)

18 "Q If -- do the bylaws carve out an exception for
19 retainer agreements for law firms?

20 "A I -- not that I'm aware of, but that is how it's
21 done."

22 MR. MASON: Mr. Noall, I believe -- and again, I
23 don't -- this could be an issue on my end or y'all's. I
24 don't know. Do you have an objection to -- because it
25 appears the answer is just starting on 262. Do you have an

1 objection to reading the question on 261, Line 20 first? I
2 think, for purposes of optional completeness, that would be
3 appropriate.

4 MR. NOALL: I agree.

5 MR. MASON: So, on 261, Line 20.

6 (Deposition read.)

7 "Q So what is your understanding of why those would
8 be outside of the regular rules?

9 "A Because the EVP does the hiring of law firms and
10 it is -- it is just being done that way. I don't know
11 why. But I do know that it is not carved out. It has
12 a lot of -- those contracts have a lot of eyes on it.

13 "Q Okay. And who would those -- who would possess
14 those eyes?

15 "A Craig Spray, the treasurer, and John Frazer,
16 secretary and legal counsel.

17 "Q Anyone else?

18 "A Probably, but those I know.

19 "Q What about the hiring of the firm Briglia
20 Hundley? Did you sign off on that retainer agreement?

21 "A Did not.

22 "Q And for the same reason: that that is a law firm
23 and that is treated differently by the NRA?

24 "A Correct.

25 "Q Have you had discussions with Craig Spray about

1 legal fees charged by the Brewer law firm?

2 "A I have not.

3 "Q Have you had discussions with Craig Spray about
4 bills issued by Ackerman McQueen?

5 "A No.

6 "Q Do you have any regular interaction with Mr.
7 Spray?

8 "A No.

9 "Q Do you have any interaction with people in the
10 treasurer's office?

11 "A No.

12 "Q And why is that?

13 "A The capacity of president, I would not. Being a
14 member of the Audit Committee, they always report to
15 us. In that capacity, I would."

16 MR. MASON: If we could jump forward to Page 335,
17 please.

18 (Deposition read.)

19 "Q Are you aware that the publicity disclosed -- the
20 publicly-disclosed Form 990 shows Mr. LaPierre's
21 salary is currently over \$2-1/2 million?

22 "A I am aware."

23 MR. MASON: Your Honor, I believe that concludes the
24 testimony of Ms. Meadows.

25 THE COURT: Thank you. And Mr. Noall, y'all's

1 portion was read in during that part; is that right?

2 MR. NOALL: Yes, Your Honor.

3 THE COURT: Thank you. This is a little bit
4 tedious, a little hard. Could we just take about a five-
5 minutes break, just to -- I think it might do everyone some
6 good. I really appreciate the way you all handled that one,
7 Mr. Mason. That was well done.

8 MR. MASON: Thank you, Your Honor. Absolutely. So,
9 2:45, 2:50?

10 THE COURT: Yes, yes. Just to let our eyes rest for
11 a minute. Okay. We'll be back. We're in recess.

12 (A recess ensued from 2:41 p.m. until 2:49 p.m.)

13 THE COURT: Everybody ready to go back on the
14 record? Just a couple of housekeeping things. We had some
15 matters that were set for tomorrow afternoon that are not
16 related to the pending motions. I moved a couple cases
17 because they're contested, I think, kind of later. And there
18 a couple more matters that they are either going to be
19 removed or agreed orders have been submitted, and I just
20 signed one agreed order.

21 So, Mr. Garman, I think that means that you'll have the
22 afternoon without any other NRA matters at least on the
23 docket.

24 Second, Mr. Mason, to answer your question about settings
25 for the following week, we have time on the 29th in the

1 morning for sure, and possibly in the afternoon, too. In the
2 afternoon, we have our standing Chapter 13 docket, so we may
3 have to work around that a little bit. And then we also have
4 all day on the 30th. So that's Thursday and Friday of next
5 week. And we're blocking it out for the NRA right now, those
6 times that aren't taken.

7 All right. Ready to go back on the record, then?

8 MR. MASON: Thank you. Your Honor, Ms. Taylor --
9 we're going to be calling Millie Hallow next, Your Honor, and
10 Ms. Taylor will be --

11 MS. TAYLOR: Hi. I've made some adjustments.

12 MR. MASON: That's better. I can hear you a lot
13 better.

14 MS. TAYLOR: Is it?

15 THE COURT: Uh-huh.

16 MR. MASON: May we proceed, Your Honor?

17 THE COURT: You may.

18 MILLIE HALLOW, ACKERMAN MCQUEEN, INC.'S WITNESS

19 BY DEPOSITION DESIGNATIONS

20 MR. MASON: If we could go to -- start on Page 10,
21 please, Line 8.

22 (Deposition read.)

23 "Q Could you state your full name for the record?

24 "A Mildred Hallow.

25 "Q Okay. And you go by Millie; is that right?

1 "A That is correct.

2 "Q And there may be an oversight on what I -- I'm
3 going to -- I'm going to ask, what is your educational
4 background?

5 "A I went to -- graduated from high school, and I
6 went for two years to the University of California at
7 Davis, dropped out, and in subsequent years did summer
8 courses at -- at UCLA when my then-husband was an
9 attorney."

10 MR. MASON: Then if we can skip to Page 23, please,
11 Line 2.

12 (Deposition read.)

13 "Q How did you become an employee of the NRA?

14 "A At the end of the summer, the CEO, Wayne
15 LaPierre, asked me to come work for him, and I said
16 that I could not because I had signed a teaching
17 contract. And at the end of the year, then he said,
18 well, at the end of the year, please consider coming
19 back to work for us, and I did. And that's what I
20 did."

21 MR. MASON: Then if we could go to Page 27, please,
22 Line 23.

23 (Deposition read.)

24 "Q When you were first hired, who -- was anyone else
25 involved in hiring you other than Mr. LaPierre?

1 "A Not to my knowledge.

2 "Q Did you go to work directly for Mr. LaPierre at
3 that time?

4 "A When I became an employee, I had an office that
5 was within the EVP suite, so yes, I reported directly
6 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. What was your title when you first
11 started?

12 "A Special assistant.

13 "Q Special assistant to whom?

14 "A The EVP.

15 "Q Okay. And what were your jobs responsibilities
16 at that time?

17 "A It evolved."

18 MR. MASON: And if there's no objection, I know
19 there's a large block on the next page, I'm just going to
20 continue reading, if that's okay with the Debtors, just the
21 remainder of Page 28.

22 MS. PILATOWICZ: Your Honor, I don't believe this
23 was designated.

24 MR. MASON: Sure. And I don't think it is. But I'm
25 showing on my copy that we did designate beginning on Page

1 29, Line 1. So if you want us to start reading in the middle
2 of an answer we can do that.

3 MS. PILATOWICZ: And I have, in what you provided
4 us, 28 through 16 through 30 to 19 was removed. So I'm not
5 seeing anything. The next designation I have from what you
6 sent us started at Page 35.

7 MR. MASON: You are -- you are absolutely correct.
8 I apologize. So let's -- we'll skip over that. So if we can
9 go to Page 34, please. Sorry about that. And it appears
10 some of these, we did remove, so there could be some things
11 highlighted in yellow that I will skip. So let's go to Page
12 35, Line 17, please.

13 (Deposition read.)

14 "Q You mentioned your first title was special
15 assistant to Mr. LaPierre. What was your next title?

16 "A I think -- I think it might have been director of
17 external affairs, but I'm not sure.

18 "Q Did your office change when you became director
19 of external affairs?

20 "A My office changed all the time because there's
21 not enough space on -- on the floor.

22 "Q Did your pay change when you became director of
23 external affairs?

24 "A I was given increases all along the way. I don't
25 know whether a pay change occurred concurrent with the

1 title change.

2 "Q And who would make the determination of what your
3 compensation would be?

4 "A That would -- I assume that was discussed with
5 Mr. LaPierre and Mr. Phillips, who was the treasurer
6 at that time.

7 "Q And that's Wilson Phillips who we call Woody
8 Phillips?

9 "A That is correct.

10 "Q Anybody else that you know of that would be
11 involved in compensation decisions for your
12 compensation?

13 "A No."

14 MR. MASON: If we could go to Page 37, please, Line
15 6.

16 (Deposition read.)

17 "Q And when you were offered the position, was there
18 any background check that you had to go through before
19 you were hired?

20 "A I don't know.

21 "Q Did you have to deal with the -- any personnel
22 office as far as vetting you for your -- for the
23 position?

24 "A I don't remember. I think probably, but I don't
25 remember any of that.

1 "Q What you remember is the offer came from Mr.
2 LaPierre and that was all that you needed; is that
3 your understanding?

4 "A That is correct."

5 MR. MASON: Page 39, Line 10.

6 (Deposition read.)

7 "Q Okay. Let me clarify my question. Have you ever
8 been accused of a crime?

9 "A I -- I was accused of a crime in -- at the D.C.
10 Commission on Art and Humanities.

11 "Q Okay. What was the crime that you were charged
12 with?

13 "A I was charged with misappropriating funds from
14 the D.C. Commission on Arts and Humanities.

15 "Q And did you plead guilty to that crime?

16 "A I did.

17 "Q What was the amount that you were charged with
18 misappropriating?

19 "A Around \$22,000 or \$23,000. I -- I do not
20 remember.

21 "Q Were you terminated from that position when this
22 was discovered?

23 "A Effectively. I -- I think I was allowed to
24 resign."

25 MR. MASON: If we could then go to Page 45, please,

1 Line 15.

2 (Deposition read.)

3 "Q What was the reason for the -- I'll call it the
4 embezzlement of the \$23,691 that's referenced in the
5 article?

6 "A The reason?

7 "Q Yes.

8 "A I'm not quite sure what you're --

9 "Q Were you and Mr. Nick Nay (phonetic) in debt?
10 Did you need the money?

11 "A No. But then I was with Mr. Walters. We did a
12 lot of entertaining that was probably beyond our
13 means, and that is my recollection."

14 MR. MASON: If we could go over to Page 47,
15 beginning on Line 19.

16 (Deposition read.)

17 "Q Okay. How long did it take you to complete the
18 restitution, repaying the \$23,000 to the City?

19 "A Four or five years. No. Okay. Four -- four or
20 five years, I would guess.

21 "Q And your probation was five years; is that
22 correct?

23 "A It was. It was unsupervised. So I don't even
24 remember a notice saying it was over. I never spoke
25 to anybody, I don't think, or that I remember.

1 "Q Do you dispute that the sentence was five years'
2 probation?

3 "A If that's -- is that what the record shows? I
4 don't dispute whatever the record shows.

5 "Q When you first started to work with Mr. LaPierre,
6 did you tell him you were on probation?

7 "A I -- it was a long time after that. I was not.

8 "Q You were -- you were not on probation in 1994
9 when you did the book tour; is that right?

10 "A As a consultant. Correct.

11 "Q Okay. Did you disclose anything about this
12 criminal history to anyone at the NRA when you were --
13 during the -- during the '90s?

14 "A I don't remember. I -- I don't remember.

15 "Q Did the NRA at some point learn about this
16 criminal guilty plea?

17 "A I might know this only in a privileged
18 conversation.

19 "Q When -- when did this conversation take place?

20 "A I'm not sure. Last -- last summer, perhaps.

21 "Q Who was present during the conversation?

22 "A I don't know what to say."

23 MR. MASON: If we could then go to Page 59, Line 20,
24 please.

25 (Deposition read.)

1 "Q Have there been any subsequent discussions with
2 Mr. LaPierre about your guilty plea?

3 "A No. I have not."

4 MR. MASON: If we could go to Page 69, please. Line
5 2.

6 (Deposition read.)

7 "Q Okay. Well, let me have you review what will be
8 Exhibit 6."

9 MR. MASON: And then down to Line 13.

10 (Deposition read.)

11 "Q If you could take a look at this document, which,
12 for the record, is a fax dated April 23rd, 2018 to
13 Millie Hallow's eyes only, from Norm Partners, LLC,
14 and signed by Oliver North. Let me direct your
15 attention to the point of my last question. On the
16 second page -- let me ask the question first. Is this
17 a message that came to you subsequent to that meeting
18 at Colonel North's Dulles office?"

19 MS. PILATOWICZ: And Your Honor, the Debtors have an
20 objection to this line of questioning. It's based on a
21 document that is hearsay.

22 THE COURT: Which Ackerman exhibit is it, Mr. Mason?

23 MR. MASON: Your Honor, it's Ackerman Exhibit 177.
24 It's a memo from Colonel North that was prepared and sent to
25 Ms. Hallow while he was the president of the NRA.

1 MS. PILATOWICZ: That's incorrect, Your Honor. It
2 was prior to him becoming the president. It was April of
3 2018.

4 MS. MONTGOMERY: Ah, you're -- I stand -- well,
5 that's -- that is correct. He was a board member at the
6 time, though, Your Honor.

7 MS. PILATOWICZ: And Your Honor, the -- first, the
8 witness's next statement is that she hasn't seen the document
9 and she doesn't know what it is. But even further, this
10 wasn't Mr. North acting in any capacity on behalf of the NRA.
11 I believe that what they'll present is it was actually his
12 attempted negotiation with the NOA -- with the NRA.

13 THE COURT: Anything further on the objection, Mr.
14 Mason?

15 MR. MASON: Your Honor, Ms. Hallow does testify
16 about a meeting that she had with Colonel North and Mr.
17 LaPierre with respect to the terms of Mr. North's employment
18 with Ackerman McQueen. There's an extensive amount of
19 testimony here, as you can see, relating to those particular
20 discussions and how the agreement would be set up.

21 THE COURT: I'm going to sustain the objection.

22 MR. MASON: And go down to Page 70, beginning on
23 Line 5.

24 (Deposition read.)

25 "Q Okay. Let me direct your attention to the second

1 page."

2 MS. PILATOWICZ: And Your Honor, this is just
3 reading from that document for which you just sustained the
4 objection.

5 MR. MASON: And Your Honor, if I may, the testimony
6 continues and she's asking whether it refreshed her
7 recollection about a meeting that took place in April of
8 2018.

9 THE COURT: Any other response in furtherance of
10 your objection?

11 MS. PILATOWICZ: Your Honor, I think if he wants to
12 move to the discussions, to the extent that they were -- they
13 contain non-hearsay, we can move on to that, but the portion
14 he's about to read is a quote from the document.

15 MR. MASON: And I believe it's appropriate in this
16 instance to refresh -- the witness's recollection is simply
17 being refreshed as to the meeting.

18 THE COURT: I'll let it be used to refresh her
19 recollection only.

20 (Deposition read.)

21 "Q Let me direct your attention to the second page.
22 It says Item No. 1, Options. A, Direct employee of AM
23 or MG preferred. B, Fee for service contract between
24 Veritas Productions, LLC and NRA-affiliated entity, AM
25 or MG.

1 Does this refresh your recollection that there
2 was discussions about Ackerman McQueen or Mercury
3 Group during this meeting in April of 2018?

4 "A I know there were discussions about Ackerman
5 McQueen in subsequent meetings. I don't remember that
6 happening at the very first meeting, but I have to say
7 that I was in and out for some of that time. Susan
8 LaPierre was in another room at Freedom Alliance, and
9 she wanted my help on another project, so I was in and
10 out of that meeting. I -- I don't remember that at
11 all in the first meeting.

12 "Q Did you take notes during this meeting?

13 "A I did not.

14 "Q Did anyone take notes during the meeting that you
15 know of?

16 "A I'm trying to envision it. I don't -- it was so
17 preliminary, I don't think anybody did.

18 "Q Did -- did Wayne LaPierre have his yellow pad
19 with him?

20 "A I don't think he did, but I'm not -- I'm not
21 sure. But it -- it was more a conversation, is my
22 recollection.

23 "Q Do you recall a conversation involving some way
24 to replace the loss of income that Colonel North would
25 have if he came -- became president of the NRA?

1 "A I don't remember that.

2 "Q Do you recall any discussion that Colonel North
3 would have to leave his position at Fox if he were to
4 become president at the NRA?

5 "A I -- I do remember a discussion of that and how
6 Colonel North wanted to make sure that he did not
7 start conversations with the Fox people if this thing
8 might not happen and that he really needed to think
9 about it and that he wanted to have a full discussion
10 with Mr. Sullivan, who is a longtime legal, you know,
11 the Brendan Sullivan person. That's I think why I
12 remember it just as a very general kind of overture
13 meeting, but I must say I can't -- I can't remember.
14 I remember that, but I just -- it was kind of easing
15 in, you know. If this happened, I don't -- I don't
16 recall it, or it happened when I was out of the room
17 in terms of talking about logistics of stuff, and my
18 recollection is that it was much later. Admittedly,
19 I'm foggy on it."

20 MR. MASON: Okay. And so further down Page 2, where
21 it says --

22 MS. PILATOWICZ: And Your Honor? Your Honor, this
23 is continuing to read from the document that was excluded by
24 the Court.

25 MR. MASON: Your Honor, I don't have any objection

1 -- well, I would be happy just asking the second part of that
2 question that I don't believe is reading from that document.
3 And I don't believe calls for hearsay.

4 THE COURT: So, starting with the word "You"? At
5 the end of that line?

6 MR. MASON: Yes, Your Honor.

7 THE COURT: Okay. I sustain the hearsay objection,
8 but you can start with the "You" part.

9 (Deposition read.)

10 "Q You don't recall any conversations about
11 compensation for Mr. -- for Colonel North during this
12 meeting?

13 "A On this, I'm fairly sure that didn't happen.
14 Again, that doesn't -- that doesn't comport with what
15 I remember about the first meeting.

16 "Q Because you were in and out of the room?

17 "A Yes. But, again, my recollection of the first
18 meeting was that it was not nitty-gritty. There was
19 no money or anything like that discussed. It was
20 rather more how would the board feel if this happened?
21 You know, what is the timing? What do other officers
22 think? It was -- it was that kind of conversation.
23 That is my recollection.

24 "Q Was there the discussion about why Pete Brownell
25 could no longer be president of the NRA?

1 "A I'm sure that must have been part of the context
2 of why Mr. LaPierre was asking if Ollie was
3 interested. I don't remember that it was, but I think
4 it would have had to be part of the conversation.

5 "Q Was there a discussion about the problem that Mr.
6 Brownell had with his trip to Moscow or Russia?

7 "A Actually, I don't think so. I don't think that
8 came up.

9 "Q Okay. How long was the meeting?

10 "A Hour and a half. It wasn't that long. And I
11 remember it wasn't that long because I think this was
12 squeezed within a time frame where Colonel North had
13 to -- had a speaking engagement. Mr. LaPierre had --
14 they had commitments, and this was a time that they
15 could make it work.

16 "Q Do you have any recollection of a position at
17 Ackerman McQueen being discussed in that meeting?

18 "A Not in this first meeting.

19 "Q Is it possible that this fax dated April 23rd
20 relates to some other meeting, a second meeting? That
21 you're -- you're describing a different than what was
22 -- than what's discussed in these deal points?

23 "A I -- anything is possible. I wasn't in all of
24 the meetings, and I was not in any of the
25 negotiations.

1 "Q Did you have any discussions with Wayne LaPierre
2 subsequent to the meeting about making Colonel North
3 president of the NRA?

4 "A He was -- Mr. LaPierre was pretty excited that
5 Ollie was willing to consider it. And when he said
6 affirmatively he would do it, they had been friends
7 for a number of years and it was a very up moment.

8 "Q And that up moment was during the meeting?

9 "A The first meeting? The first meeting, the up
10 moment was Wayne. At the end of the meeting, and
11 we're getting in our respective cars, Wayne said, he
12 didn't say no.

13 "Q What was the next meeting you're aware of between
14 Mr. LaPierre and Colonel North about him becoming
15 president of the NRA?

16 "A I don't know. So this -- the -- the annual
17 meeting was coming up pretty quickly, and there was a
18 bunch -- there was a bunch of meetings. I was not a
19 part of a lot of them simply because it was not in my
20 area if it was figuring stuff out. I tend to be
21 event-related. But there were meetings after, and
22 they -- what I'm envisioning is that the meetings --
23 because it had to be very quiet. We didn't want
24 people to know that Ollie -- Colonel North was being
25 considered. And it was a very limited group of people

1 going into the convention of Dallas that knew. So,
2 probably there were no meetings at NRA headquarters.
3 But I don't know. I just -- I don't know. Things
4 were moving past, and I -- there were meetings, but I
5 don't remember anything of significance. If -- ask
6 me, but I -- it just sort of moved."

7 MR. MASON: If we could jump now to Page 89, please,
8 beginning on Line 21.

9 (Deposition read.)

10 "Q Did you ever hear Mr. LaPierre refer to Tony
11 Makris as his brother?

12 "A They both referred to each other as brothers.

13 "Q Do you know why that is?

14 "A They have a relationship of long duration, where
15 they both socialized and did Second Amendment work
16 together. It was a -- it was a full relationship."

17 MR. MASON: If we could jump now to Page 132,
18 please, beginning on Line 20.

19 (Deposition read.)

20 "Q Who handles Mr. LaPierre's travel arrangements?

21 "A The -- his flight travel and ground travel?

22 "Q Yes.

23 "A Local, it would be Mercury Group, usually,
24 through Nader. For outside, the air transportation,
25 it would be a woman named Gail Stanford. Or Sanford.

1 I always get it wrong.

2 "Q Stanford?

3 "A Stanford.

4 "Q And how long has he been -- and how long has he
5 worked with Gail Stanford?

6 "A I first heard of Gail, my recollection is that
7 she was -- she was previously doing some travel
8 scheduling for Angus McQueen, and when Wayne did his
9 first book, Wayne LaPierre did his first book tour
10 that I was involved in that summer, I have the
11 impression that that's when she first began to do --
12 she did all the travel for Mr. LaPierre, Mr. Schropp,
13 and Ms. Simony (phonetic). And did the car rentals
14 and all of that. That is -- I have the impression
15 that that was her first intensive stuff with Mr.
16 LaPierre.

17 "Q And do you work with Gail Stanford to coordinate
18 the details of his travel, letting her know where he
19 needs to be at certain times?

20 "A If it was an event that -- where the event
21 itself, where I have been involved in and I know the
22 schedule, he could say to Ms. Stanford, Millie knows
23 all the details, let her tell you what time I need to
24 arrive and what room it's in. If I'm traveling with
25 him, then -- then the same thing. But if it's not

1 something I'm involved in, increasingly, Wayne's
2 travel person was Nader Tavangar, and Ms. Stanford
3 would deal directly with him and the security person
4 that Wayne now has to have with him at all times.

5 "Q Who is that security person?

6 "A His name is Chris Kinney, K-I-N-N-E-Y.

7 "Q And is he the person who recommended that Mr.
8 LaPierre use private jets?

9 "A That's the recommendation -- that recommendation
10 came not from Wayne's personal security but our -- our
11 NRA security body, which interacts with local and
12 federal threat-type people.

13 "Q And who is the person in charge of that?

14 "A His name is Jim Staples, S-T-A-P-L-E-S."

15 MR. MASON: If we could go to Page 137, please, Line
16 4.

17 (Deposition read.)

18 "Q How often would you deal with Ms. Stanford?

19 "A I -- not -- not -- that first year that I was the
20 consultant, I would talk to her on the phone every day
21 to make sure flights weren't late. I never actually
22 met her for two years. It was a phone kind of
23 conversation.

24 "Q Did Ms. Stanford arrange for travel
25 accommodations at your son's wedding?

1 "A She -- she did make -- she did do the
2 arrangements for the buses from the wedding.

3 "Q And where was your son's wedding?

4 "A It was in -- north of Minnesota.

5 "Q And did the NRA pay for that arrangement?

6 "A The NRA -- Ms. Stanford -- what the emails show
7 is that there was a bill, and Lisa told -- Supernaugh
8 told me it needed to be reimbursed. And as far as I
9 know, that was done.

10 "Q My question was -- I'm not asking what the email
11 showed. Did the NRA pay the Stanford invoice for your
12 son's wedding transportation?

13 "A I don't remember this, but I think -- I do
14 remember arranging it with Gail. I do not have any
15 clarity where she and I discussed bill it to the NRA
16 and I'll reimburse, but that is what happened. At --
17 that's what happened."

18 MR. MASON: If we could go to Page 146, please, Line
19 11.

20 (Deposition read.)

21 "Q Do you have any memory as to anyone, Woody
22 Phillips, authorizing that the NRA would pay the
23 transportation expenses for your son's wedding in
24 advance?

25 "A I have no memory of that. I'm not saying yes or

1 no. I just don't have a memory of that. I've read
2 this now through several times.

3 "Q Is it your testimony today under oath that the
4 NRA did not pay for your son's wedding or any part of
5 it?

6 "A I'm saying I have no memory of any of these
7 things, with the exception of transportation, and I do
8 remember that. And -- and I am saying that no one at
9 the NRA ever discussed any of this with me for me to
10 -- it triggers no memory. And --

11 "Q You don't recall any discussions with Lisa
12 Supernaugh about this?

13 "A None. Nor Mr. Powell."

14 MR. MASON: If we could go to Page 150, please, Line
15 2.

16 (Deposition read.)

17 "Q Are you aware of any review of your personal
18 expenses at the NRA during this time period of 2017-
19 2018?

20 "A Not that they said to me, that anyone said to me.

21 "Q Have you ever been told to reimburse the NRA for
22 inappropriate expenditures you made on your expense
23 account?

24 "A During this time? Like for what? I mean, --

25 "Q It seems to me that that would be something that

1 would be readily accessible if you were told that you
2 were misusing an NRA expense account.

3 "A Not during this time.

4 "Q What about an earlier time?

5 "A What time frame?

6 "Q During your entire tenure at the NRA.

7 "A There -- there was a period of time in the early
8 2000s where there -- there was a review, and it was
9 reviewed by the board and appropriate committees,
10 where there were some inappropriate expenses that I
11 paid back.

12 "Q What were the nature of those inappropriate
13 expenses?

14 "A Primarily clothing, and some travel that ended up
15 being personal rather than business, is my
16 recollection.

17 "Q How much did you have to pay back?

18 "A I'm -- I am not sure. In the process of looking
19 for that now. It was so long ago. I'm not sure."

20 MR. MASON: If we could go to Page 161, please,
21 beginning on Line 13.

22 (Deposition read.)

23 "Q I want to dig into the facts leading up to the
24 phone calls that you had with Oliver North and with
25 Dan Boren. Excuse me.

1 "A Yes, sir.

2 "Q That was on a Friday; is that correct?

3 "A No. It was on a Wednesday.

4 "Q It was on a Wednesday?

5 "A Yes.

6 "Q The 24th. Is that right?

7 "A I -- if Wednesday was the 24th, yes. It was --
8 it was surrounding that -- the officers meeting.

9 "Q Did you receive a call from Dan Boren that
10 morning?

11 "A I received a number of calls from Mr. Boren on
12 Wednesday morning, which I did not return because I
13 didn't recognize the number or the area code. And
14 when I don't, I want them to leave a message so I know
15 how to -- then I would call them back."

16 MR. MASON: If we could then go to Page 165, please,
17 Line 7.

18 (Deposition read.)

19 "Q So what was -- what was your impression from that
20 text that you got from Dan Boren?

21 "A We were just beginning the officers meeting, and
22 I had never had any dealings with Mr. Boren at all.
23 He didn't attend the board meetings that -- that
24 often, and our paths just never crossed.

25 So I was surprised he was calling me, as opposed

1 to somebody else in the room. And I said to the group
2 of officers that were there, Dan Boren has just texted
3 me and said I need to speak to him right away, and
4 everybody said, well, go talk to him. So I stepped
5 out of the dining room into the living room area to
6 return the phone call.

7 "Q And did the text say that Dan Boren wanted to
8 talk to Wayne LaPierre?

9 "A No. He said he wanted to -- the text said that
10 he needed to talk to me.

11 "Q Okay. So did you talk to him then?

12 "A I did.

13 "Q All right. Before we look at the notes, I just
14 want to make sure you have -- do you have any
15 recollection of your phone call with Dan Boren without
16 looking at your notes?

17 "A I -- I have a general recollection.

18 "Q What is your recollection of that conversation?

19 "A One, I was surprised. One, I was surprised that
20 he was calling me because I didn't know him and I --
21 when he called me, I said, I need to step out. He
22 said, I know you're in an officers meeting. And then
23 -- and then, boom. Without getting into -- I don't
24 want to mischaracterize, but I felt like I was being
25 punched in the stomach, because basically he said is

1 there are bad allegations coming out and that -- and
2 that unless Wayne resigned -- and I said something. I
3 said, well, no. And he said, I'll try to buy some
4 time.

5 And then I don't remember whether he said or I
6 said let me get this back into the meeting, the
7 officers meeting, or something, or get to Wayne. And
8 that's what I generally remember.

9 I had no inkling, nor had, if anybody else had
10 any inkling, they hadn't said anything to me that
11 something like this was in the works or could happen.
12 Nobody hinted at it. And everybody was sort of
13 milling around in terms of listening. And that was
14 just -- it was very upsetting to me personally, and I
15 was upset when I came back to tell the group.

16 "Q And what did you tell the group?

17 "A I -- I hadn't taken notes because I didn't know
18 it was going to be that kind of conversation, but what
19 I tried to do was that I was telling the group my
20 conversation with Dan Boren, I tried to write things,
21 because I knew that I would -- I would forget. So I'm
22 writing and telling them at the same time. Lawsuit.
23 Ackerman McQueen. Wayne resignation. There were some
24 specifics I don't remember in my notes. Maybe
25 financial stuff. I don't remember, because I don't

1 want to get it mixed up with my conversation with
2 Colonel North. And if I don't look at my notes, I'll
3 get them mixed up.

4 But when I came back to tell the group what had
5 happened, because they were all waiting for me, Wayne
6 was just very upset. Said an expletive and left the
7 room. Left. And I -- who was left in the room was
8 Carolyn, was President Ollie North, First Vice
9 President, Richard Childress, Second Vice President
10 Carolyn Meadows, Nick Perrine, the staff to the
11 president, and myself.

12 And I said, this is the first time that I've
13 heard anything about Wayne resigning. And I said to
14 -- after Wayne left, I said to Mr. Childress, do you
15 want Wayne to resign? And he said, every man -- every
16 man has his prime and every man has his time. And I
17 -- I had no idea that Richard Childress wasn't
18 supportive of Wayne.

19 By -- by this time, I'm crying, and I say to
20 Ollie, President North, do you want Wayne to resign?
21 And he said, not today. And I'm really crying by
22 then. Ms. Meadows, she was really tough about how
23 could this come about to both Mr. Childress and Mr.
24 North. I was kind of just a mess. I don't remember
25 much of their conversation, except that she was -- she

1 was really good. She didn't fall apart like I did.

2 Then, a few moments later, they all got up to go
3 to the second half of the officers meeting in another
4 room that involved only -- involved not only the three
5 elected officers but also the officer of ILA, Chris
6 Cox; Officer of General Operations, Joe De Bergalis;
7 Tyler Schropp, Director of Advancement; and Doug -- I
8 can't remember his last name -- of the -- Director of
9 Publications.

10 That broader officer meeting is always scheduled
11 after the smaller one so that everybody can say what
12 they know leading up to the annual meeting. So they
13 left and I went back up to Mr. LaPierre's suite, where
14 he was.

15 "Q Okay. Let me ask you a few questions about that.
16 And I apologize for --

17 "A Can I -- do you want -- could I see my notes?

18 "Q In good time we'll get there.

19 "A Okay.

20 "Q I need to get impressions first and test how much
21 you remember of the situation.

22 "A I'm -- okay.

23 "Q But you mentioned that Wayne said an expletive
24 and left the room. I apologize, but can you tell us
25 what expletive he said? You could spell it out if

1 you'd like.

2 "A He said -- he said, that son of a bitch, Angus
3 McQueen.

4 "Q Okay. And do you know why he was blaming Angus
5 McQueen? Is that something you said about Angus
6 McQueen?

7 "A I'm assuming because what I came back to tell the
8 group from what Dan Boren told me was that Ackerman
9 McQueen was going to instigate a lawsuit with all
10 kinds of negative allegations about Wayne.

11 "Q Was it your understanding that Wayne LaPierre was
12 surprised that -- that there would be a counterclaim
13 to a lawsuit that they -- that the NRA had filed
14 against Ackerman McQueen?

15 "A I -- he was -- he was very angry. I was
16 surprised. But I can't characterize -- I think that
17 -- I think my interpretation that the overwhelming
18 reaction that Wayne had was anger, because he -- he
19 doesn't curse.

20 MS. PILATOWICZ: Your Honor, I think we skipped a --
21 I think we skipped a counter-designation up at 171. It was
22 171, Lines 3 to 18.

23 MR. MASON: I don't know if that was counter-
24 designated. But give me one second. I'm fine with reading
25 that -- reading that in. So let's go back to 171, Line 3.

1 (Deposition read.)

2 "Q You were aware that the NRA had already initiated
3 a lawsuit against Ackerman McQueen, weren't you?

4 "A I -- I knew about it. My recollection is that --
5 and I could be wrong -- my recollection is that it had
6 to do with simply requesting the information that
7 other vendors had provided in order to be in
8 anticipatory compliance with New York not-for-profit
9 law.

10 "Q And who told you that -- and who told you that
11 understanding of that litigation?

12 "A Probably Mr. LaPierre, in talking to board
13 members, and I was in the room, who were inquiring.
14 That's why I say -- because it wasn't a conversation
15 that I had with him. I was in the room and that's, I
16 believe, what was said."

17 MR. MASON: And if we could jump forward to Page
18 173, Line 8.

19 (Deposition read.)

20 "Q Did Wayne LaPierre refer to Mr. McQueen as his
21 friend?

22 "A Very much so. Very much so.

23 "Q So what did Dan Boren say precisely about -- that
24 you remember about Ackerman McQueen in that
25 conversation?

1 "A That Ackerman McQueen was going to file a lawsuit
2 and they had -- there were a number of things that
3 they were going to say that would reflect negatively
4 on Wayne and the Association. And I -- I can't
5 remember whether there was any itemization of anything
6 the way there was in the conversation with President
7 North. I just don't remember.

8 "Q Did you interpret what he was saying as a
9 warning?

10 "A I interpreted it as the real thing, not a
11 warning.

12 "Q Okay. Did you have the impression that Dan Boren
13 was making a threat?

14 "A I -- I didn't have that impression at all."

15 MS. PILATOWICZ: And Your Honor, I apologize for
16 interrupting. This is a spot where it looks like Ackerman,
17 in its designations, has both removed it and kept it in on
18 the -- on the information they provided to us. So I think
19 that 175-2 through Line 12 needs to be read in.

20 THE COURT: Any problem with that, Mr. Mason?

21 MR. MASON: I'm fine with that, Your Honor. So
22 we'll go back to Page 175, beginning on Line 2.

23 (Deposition read.)

24 "Q Okay.

25 "A I -- I don't -- my memory -- I must have

1 something in my notes. My sense is that, oh my God,
2 what -- I didn't think of it as, oh, strike one. I
3 thought of it as the real deal.

4 "Q And what do you mean by the real thing and the
5 real deal?

6 "A That it was not a warning. It was an action that
7 will be taken unless the Association and Mr. LaPierre
8 do something or say something to deter this process
9 which Dan Boren told me has begun.

10 "Q Okay. Did you have the impression that Dan Boren
11 was making a threat?

12 "A I -- I didn't have that impression at all. It
13 wasn't -- it wasn't Millie. I mean, it was a cordial
14 conversation with a man that I didn't know who I
15 thought was trying to be helpful by giving this
16 information to the board, to those officers of the
17 board. I assumed that he knew from somewhere that the
18 board -- those officers would be meeting, because he
19 referred to that several times, and I -- other than
20 being -- felt I -- I was grateful that he called to
21 give a heads up, if I had to characterize. He wasn't
22 -- he wasn't threatening at all in his tone to me, or
23 in the way that he characterized the substance."

24 MR. MASON: If we could go to Page 179. And this
25 was something that I discussed with Debtors' counsel earlier.

1 I'm fine with withdrawing this designation based on our
2 conversation earlier. Is that --

3 MS. PILATOWICZ: The Debtors have no objection.

4 MR. MASON: Okay.

5 THE COURT: All right. It will be withdrawn.

6 MR. MASON: If we could go down to Page 180,
7 beginning on Line 21.

8 (Deposition read.)

9 "Q All right. So walk me through what you recall
10 about the -- receiving the phone call from Oliver
11 North.

12 "A I had been on the phone with another board
13 member, Ken Blackwell. And he wanted to talk to
14 Wayne. So I gave Wayne my phone so he could continue
15 to talk to Mr. Blackwell. And while Wayne was on the
16 phone to Mr. Blackwell, Mr. North was calling me on my
17 phone and Mr. LaPierre held my phone up so that I
18 could see that President North was calling me. And
19 Carolyn Meadows happened to be standing by and she
20 wasn't on her phone, so I took her phone to call
21 Colonel North back, and that's how the conversation
22 came about.

23 "Q Okay. So what was in that conversation?

24 "A Just sort of -- I have really good notes, because
25 at some -- we talked a bit, and we said -- he said --

1 I think he said something like Dan Boren read me the
2 whole Ackerman McQueen letter. And I said, do you
3 have a copy? I can come down and make a copy. And he
4 said no, I don't want anything with Ackerman
5 letterhead, he said. But let me -- please get this
6 message to Wayne.

7 And so I went to get a -- get a notepad. So I
8 went to get a notepad, and I was sitting in the
9 bedroom, like on a chaise lounge, and had the notepad
10 on my knees, and put it on speaker, because there were
11 more people that were close by, so that I could take
12 notes with both hands. And as a result, Ms. Meadows
13 heard at least some of the conversation. And he said,
14 gosh, financial, the contents of this document were
15 financial mismanagement accusations, sexual harassment
16 charges against Josh Powell, clothing expenditures by
17 Wayne. And he might have said a number, but I didn't
18 write it down in my notes. So I wasn't aware of the
19 number until it came out in the papers. That's one,
20 two, three. Something about Tyler Schropp and
21 something about an apartment for Wayne or Susan's
22 niece.

23 "Q Did it seem that he was reading from a document?

24 "A I could not -- I could not tell. He said he
25 didn't have a copy of the document, and I believe him.

1 So it must have been from his own notes, because I
2 think he would have otherwise let me come down and get
3 a copy otherwise.

4 "Q Did he say where he got the information from?

5 "A He said Dan Boren. I think he said Dan Boren
6 called. But then it sounded like he saw a copy but
7 didn't keep a copy. But I don't know.

8 "Q Did you interpret the information he was giving
9 you as a threat?

10 "A I -- I was glad that Ollie was telling -- that
11 had gotten more detail, because I had never heard
12 President North say, in my presence, a negative word
13 about Mr. LaPierre. He didn't like some people, but
14 he was, in my presence, always complimentary of Wayne.

15 "Q So it's your impression that he was just passing
16 on information that he received?

17 "A That's not the end of the conversation. I'm
18 taking notes, and then he said to me, and I wrote it
19 down precisely because it was important, he said
20 something to the effect of, but if I, Ollie, am still
21 president, I can make this all go away and help Wayne,
22 which is all I've ever wanted to do. Something
23 reassuring like that. And I, Ollie, can talk to Angus
24 McQueen and we can find -- I don't know if the verb
25 was find -- I wrote it down -- find -- the phrase was,

1 quote, get x months for Wayne.

2 And that's sort of when I again started to cry,
3 because that meant to me that Mr. North did not want
4 Wayne LaPierre to remain, because x months is months,
5 and something about get x months and then get him an
6 excellent retirement.

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

25 "Q Who was Josh and Bill that you refer to?

1 "A I interpreted it to mean Josh Powell and Bill
2 Brewer.

3 "Q So were they around when you reported this to Mr.
4 -- were they around when you reported this to Wayne
5 LaPierre?

6 "A They were certainly around before and after, and
7 may have been during, but they were in and out all the
8 time. So I don't know if they were actually in the
9 room when I told it to Wayne. If they were not, they
10 were shortly thereafter. I just -- I can't -- I can't
11 visualize it.

12 "Q Do you think that you would have -- do you think
13 that you would have done something that -- that Oliver
14 North expressly asked you not to do and report this to
15 Wayne in front of them?

16 "A Not -- as to whether I would have done it, I
17 think I was so rattled and so upset I wanted to get it
18 directly to Wayne, and he was in the next room. That
19 would lead me to believe that maybe they weren't in
20 the room, but I don't know. I just wanted to get it
21 to him, and Ollie encouraged me to do it ASAP. But I
22 don't know if -- that's what I did.

23 "Q How did Wayne LaPierre react to your message?

24 "A I don't remember his reaction. But Ms. Froman
25 and Mr. Bach, who are board members and also lawyers

1 that were listening, said, that's extortion."

2 MR. MASON: If we could go to Page 197, Line 17.

3 (Deposition read.)

4 "Q Did Oliver North ever tell you that he wanted
5 Wayne LaPierre to resign?

6 "A Never."

7 MS. PILATOWICZ: Your Honor, I believe that the next
8 designation was Page 188.

9 (Pause.)

10 MS. PILATOWICZ: What we have from Ackerman starts
11 at 188, Line 21.

12 MS. TAYLOR: I believe there was a typo in the
13 chart. The intent was to remove 188-21 through 197-16, and
14 then only include 197-17 through 19. And then it jumps down
15 to the next line, also removing 197-20 through 25.

16 MS. PILATOWICZ: Yeah, Your Honor, it does look like
17 at one point it says it's removed and at one point it stayed
18 in. So we would request that 188, Line 21 through 197, Line
19 -- yeah, through 197-25, be read into the record.

20 THE COURT: And that was in previously by Ackerman;
21 is that right?

22 MS. PILATOWICZ: That's correct, Your Honor. It was
23 also noted in the designations that they gave us yesterday as
24 being kept in. But I -- I see now there's an inconsistency
25 and it says it's removed at one place and kept in at another.

1 THE COURT: Mr. Mason?

2 MR. MASON: So the Debtors want -- well, if -- I
3 mean, if -- it looks like there is an inconsistency, and I
4 think our intent was to remove it, especially because it's 11
5 pages. But based on the Court's --

6 MS. PILATOWICZ: I --

7 MR. MASON: -- prior ruling, if we need to read the
8 11 pages in, we can do that.

9 THE COURT: Yeah. I think you need to, just for
10 trying to be consistent.

11 MR. MASON: Okay. So let's go, then, to 188, Line
12 21.

13 THE COURT: For my reference, what's Hallow Exhibit
14 15 for your exhibits, Mr. Mason?

15 MR. MASON: I believe that is NRA Exhibit 261.

16 THE COURT: Thank you.

17 MS. PILATOWICZ: That's correct, Your Honor, and we
18 would move for its admission with this portion of the
19 testimony.

20 THE COURT: Let me get it up.

21 MR. MASON: Your Honor, I would object based on
22 hearsay to that particular document.

23 MS. PILATOWICZ: Your Honor, I believe that the
24 Court --

25 MR. MASON: There are -- there are -- I think one of

1 the other issues with that, with those notes, is that -- that
2 the notes, again, implicate numerous conversation -- or, the
3 conversation that Ms. Hallow had with Colonel North, who
4 talked at length about what was discussed with Ms. Hallow in
5 the -- in her telephone conversation. But I know, based on
6 Your Honor's prior ruling, Mr. North's testimony on that
7 issue is not permitted at this time.

8 THE COURT: Was North president at the time?

9 MR. MASON: Was North president? He was -- he was
10 president at the time of the conversation with Ms. Hallow.
11 That is -- that is correct.

12 THE COURT: Uh-huh.

13 MR. MASON: And to the extent that brings up -- and
14 I don't want to open a can of worms -- but to the -- a large
15 portion of Colonel North's deposition testimony that we did
16 attempt to designate was while he was the acting president of
17 the NRA.

18 THE COURT: Well, I've already ruled on his and I'm
19 not going to revisit that. I'm going to admit the exhibit.

20 MS. PILATOWICZ: Thank you, Your Honor.

21 THE COURT: That's, for the record, NRA 261, which
22 is referred to in this portion of the deposition as Hallow
23 Exhibit 15.

24 (Debtor's Exhibit 261 is received into evidence.)

25 MR. MASON: So, beginning on Page 188, Line 24.

1 (Deposition read.)

2 "Q All right. First, I want to ask handwriting
3 questions. Some of these notes are yours and some of
4 them are not; is that correct?"

5 "A This cover sheet is. I think it's Andra Fisher.
6 Because somebody, it might have been Mr. Brewer, asked
7 me where my notes were, and I believe I gave them to
8 -- maybe it was during Indianapolis. I gave them to
9 Andra Fisher and said please hold this so that it
10 doesn't get lost. Then somebody from the Brewer firm
11 -- law firm came and collected them from Andra.

12 "Q Okay. How about the second page? Whose
13 handwriting is that?

14 "A That is -- that is a shrunken version of my
15 notes. Notes for Ollie's call, Mr. North's call.

16 "Q Okay. And the third page, whose handwriting is
17 that?

18 "A That is my handwriting. And evidently, it was on
19 the other side of the sheet, but it doesn't relate to
20 the Oliver North call.

21 "Q Okay. We'll get back to the substance. I'll go
22 to the next page. Whose handwriting is that?

23 "A That is my handwriting as I was telling to the
24 officers the Dan Boren conversation.

25 "Q Okay. And on the next page, whose handwriting is

1 that?

2 "A That is not my handwriting, and I'm not familiar
3 with this.

4 "Q Could that be Carolyn Meadows's handwriting?

5 "A I don't know.

6 "Q Okay. Let's look at the next page, then, with
7 the big X across it. Whose handwriting is that?

8 "A I don't know. It's not my handwriting.

9 "Q And the next page, whose handwriting is that?

10 "A I don't know. It's not my handwriting.

11 "Q Okay. Did you provide all these to Andra Fisher
12 or only your notes to Andra Fisher?

13 "A The notes that were my notes, upon instruction
14 from -- instruction from Brewer, were given to Andra
15 Fisher.

16 "Q Okay. Let's go to the first one in time, the --
17 your notes of the Dan Boren call. That's the fourth
18 page of the exhibit.

19 "A Yes.

20 "Q What does -- can you read it to me? What's the
21 top thing? I don't understand that top line.

22 "A On the right-hand side?

23 "Q Yes.

24 "A It says Eling (phonetic) after 5:00 o'clock.
25 She's a board member. Eling knew. And I just had

1 noted, totally not related to this, that she wasn't
2 coming in until 5:00 o'clock.

3 "Q And what are the arrows on the left side of the
4 top page?

5 "A That is my handwriting. I don't -- I might have
6 been -- I don't know. It's not related to the Boren
7 call.

8 "Q Okay.

9 "A It's just a piece of paper I had.

10 "Q So then you start your notes on the Boren
11 conversation right below, where it says Boren
12 Conversation.

13 "A Yes. I think -- yes. At first, I think I wrote
14 down the text. Right now I know you are going into a
15 meeting and I think I still -- I think I was told to
16 take a picture of the text, so that exists somewhere.

17 "Q I see. And so was this note prepared during the
18 Dan Boren call?

19 "A I -- I didn't take notes because I didn't know
20 that -- it was a fairly quick phone call, but I --
21 when I went back to tell the officers what happened, I
22 wrote as I was telling them. I know you're officers.
23 I have to tell. I have intel that in the next two to
24 three hours Ackerman McQueen will file a lawsuit that
25 will have negative implications and impact for Wayne.

1 "Q Okay.

2 "A And I -- and that's all I wrote because what was
3 the uppermost in my mind was this immediate
4 resignation of Wayne. I might have blurted that out
5 in the beginning. I can't -- either the beginning or
6 the end of the conversation. I can't --

7 "Q Okay. So where in your notes does it talk about
8 immediate resignation?

9 "A I -- I have a fuller version in my typed-up notes
10 when that -- I can't remember. I remembered it at the
11 time, even though it's not noted because it was still
12 fresh, but --

13 "Q You did the handwritten notes before you did the
14 typed-up version; is that correct?

15 "A Yes.

16 "Q So aren't the handwritten notes fresher than the
17 typewritten notes?

18 "A But they were -- the handwritten notes are
19 fresher to the conversation, but they're not fuller
20 than what I was able to recall when I was crazed with
21 getting the information out as quickly as possible to
22 the officers who were waiting.

23 "Q Okay. But is the -- what's in your -- what's in
24 the handwritten notes? Is that what you told Wayne
25 LaPierre following the Dan Boren conversation?

1 "A The handwritten notes is what I told Wayne
2 LaPierre, Oliver North, Richard Childress, and Carolyn
3 Meadows. They were just past a sliding wall.

4 "Q Okay. And so -- and you told Wayne LaPierre, I
5 have intel that in the next two to three hours --

6 "A Dan Boren told.

7 "Q Dan Boren told you this, but this is what you
8 told Wayne LaPierre, that Dan said, I have intel in
9 the next two to three hours that Ackerman McQueen will
10 file a lawsuit that will have negative implications,
11 negative? Is that implications and impact for Wayne?
12 Is that --

13 "A Yes.

14 "Q So after he heard that statement, he said, that
15 son of a bitch, Angus?

16 "A Because I said that they wanted his -- Dan also
17 told me that they wanted his immediate -- this could
18 be put away if they got -- if Wayne immediately
19 resigned.

20 "Q So that's -- that's something that's not in your
21 notes, but you told him that?

22 "A Yes. Not in my handwritten notes.

23 "Q Okay.

24 "A And then not -- also not in my handwritten notes
25 is Mr. Boren said, I will try to see if I can postpone

1 for a couple of hours.

2 "Q Okay. Now, was Froman and Bach there when you
3 told them about this, the Dan Boren Call?

4 "A No. It was only the officers.

5 "Q Okay. Let's go to the Oliver North notes on the
6 second page. And were these notes taken while you
7 were on the call?

8 "A Yes. Yes.

9 "Q Okay. And it looks like -- can you read that on
10 the record?

11 "A Which part?

12 "Q Wherever it starts and wherever to -- to wherever
13 it goes.

14 "A In my written notes, there's a top of -- there's
15 conversation with Ollie where he said, I got a call
16 from Dan Boren and I have more details.

17 "Q No. I'm just asking you to read what's in your
18 handwritten notes.

19 "A Oh, just read it straight through?

20 "Q Right.

21 "A From the -- from the top?

22 "Q Yes.

23 "A Ollie called me. I called him on CM phone. And
24 then I wrote Dan, Ollie, 2:58 p.m. Devastating
25 account of financial status. Sexual harassment,

1 meaning Josh. Wayne/quoting. Schropp. Half-million
2 luxurious travel, much but not all reimbursed by NRA.
3 Apartment for -- apartment for Susan, niece. And then
4 up at the top, I put Allen, immediate resignation of
5 Wayne. Ollie willing -- Ollie willing to negotiate x
6 months for Wayne and something -- not something --
7 retirement excellent on top. Oh, not -- not
8 negotiate. To negotiate X months for Wayne, excellent
9 retirement. And then up in this corner, not give --
10 it's something, not it -- not something -- not share
11 -- not share of Wayne with Josh and Bill.

12 "Q And that's the end of that note on the call?

13 "A That's the end that's relevant to the call, yeah.

14 "Q Okay. And is this the notes that you used to
15 convey that information to Wayne LaPierre?

16 "A Yes.

17 "Q And was there discussion you had with Oliver
18 North about Ackerman McQueen in this call?

19 "A That he, Ollie, if was still president, was
20 willing to negotiate with Angus McQueen and try to get
21 x months for Wayne with an excellent retirement.

22 "Q Okay. Did it sound like Oliver North was trying
23 to solve the problem?

24 "A I -- I -- I thought he was, until I heard x
25 months.

1 "Q And what is it about x months that means -- that
2 means you think he was not trying to solve the
3 problem?

4 "A It's because I think in terms of Wayne as the
5 leadership of the NRA in terms of years, not months,
6 and I just was -- I -- I was shocked at that.

7 "Q Were you concerned that if Wayne LaPierre left,
8 your job -- your job was in jeopardy?

9 "A That didn't cross my mind.

10 "Q So if he hadn't said, willing to negotiate x
11 months, you would have thought Oliver North was trying
12 to help the situation; is that right?

13 "A That's kind of a hypothetical, isn't it, now?

14 "Q Okay. Did Oliver North ever tell you that he
15 wanted Wayne LaPierre to resign?

16 "A Never.

17 "Q Okay. Have you reviewed Oliver North's
18 deposition transcript in this case?

19 "A I have not.

20 "Q Do you have an understanding of what he testified
21 to about this conversation?

22 "A I have no idea."

23 MR. MASON: Can we go to Page 199, Line 21?

24 (Deposition read.)

25

1 "Q And there's something in all caps on the third
2 page of this exhibit.

3 "A Yes.

4 "Q It says, this will all be withdrawn with the
5 immediate resignation of Wayne. Do you see that?

6 "A Yes.

7 "Q And that's not in the -- and that's not in your
8 -- that's not the way it's written in your handwritten
9 notes; is that right?

10 "A In my handwritten notes, it says immediate
11 resignation of Wayne. So that's right. But that is
12 what he said.

13 "Q So it says immediate resignation of Wayne.
14 Window is short. Right?

15 "A Yes.

16 "Q Now, so is it your understanding that Oliver
17 North could actually state with confidence that the
18 new suit, whatever that would be, by Ackerman would be
19 withdrawn with the immediate resignation of Wayne? Is
20 that your understanding?

21 "A My understanding was that -- my understanding is
22 that it seemed like he was willing to do that, but I
23 don't know whether -- if you're asking whether he had
24 the wherewithal to do it, I don't know, because it
25 just -- I was so upset about when he said x months

1 that that is the first inkling I had that he wasn't
2 totally supportive of Wayne.

3 "Q Okay."

4 MS. PILATOWICZ: Your Honor? Your Honor, I would
5 move for the admission of AMC Exhibit 163, which is Exhibit
6 16 that's referenced in that discussion, the typed-up notes
7 from Millie Hallow.

8 MR. MASON: I would object based upon hearsay and
9 foundation, Your Honor.

10 THE COURT: Let me just -- what's the NRA number of
11 the exhibit?

12 MS. PILATOWICZ: Your Honor, it's actually AMC
13 Exhibit 163.

14 THE COURT: Okay. Let me get it. So, AMC 163.

15 (Pause.)

16 MR. MASON: And again, our objection to this, Your
17 Honor, would be this is -- this is hearsay. This is Millie
18 Hallow's notes. There's been no -- no exception established.

19 THE COURT: Could you just point me in the
20 deposition where it's referenced?

21 MS. PILATOWICZ: Your Honor, it's Exhibit 16 in the
22 deposition. It's referenced -- it starts at Page 198, which
23 is just the page before where we started reading.

24 THE COURT: Okay.

25 MS. PILATOWICZ: And she says -- the questioning was

1 about the -- the capitalized letters about Wayne's
2 resignation.

3 THE COURT: All right. Thank you. Ackerman 163 is
4 admitted.

5 (Ackerman McQueen's Exhibit 163 is received into
6 evidence.)

7 MR. MASON: And I believe if we go next to Page 202,
8 Line 6.

9 (Deposition read.)

10 "Q Okay. Did he say in his phone call later that he
11 had spoken with anyone at Ackerman McQueen?

12 "A He only said he had talked to Dan Boren.

13 "Q Did you yourself believe that Oliver North wanted
14 Wayne LaPierre to resign?

15 "A I don't know.

16 "Q Isn't your prior testimony that you believe that
17 Oliver North was always supportive of Wayne LaPierre?

18 "A I thought he was.

19 "Q And those notes about Oliver North's statement,
20 does that indicate to you that he was going to try and
21 help Wayne LaPierre?

22 "A I was -- I can say I was fixated on the x months
23 and that it was only a short term as opposed to
24 confidence in him going forth with the future of the
25 organization. That's how I interpreted it.

1 "Q But you -- you know Oliver North very well; is
2 that right?

3 "A I thought I did.

4 "Q And you professed an affectionate love for him in
5 this deposition, and also I notice you signed some of
6 your emails to him, "Love, Millie," correct?

7 "A There is an affection. He had cancer. I had
8 cancer. We prayed for each other and grew close more
9 recently over that kind of thing.

10 "Q Do you think he was trying to extort Wayne
11 LaPierre?

12 "A That's not for me to say. I do -- that is a
13 legal term and I -- and I don't know.

14 "Q Did you get the sense that he was trying to help
15 Wayne LaPierre in this phone call?

16 "A Until I heard the x months, and then --

17 "Q And then what?

18 "A And then in that moment I knew he wasn't
19 supportive.

20 "Q Supportive of Wayne LaPierre's remaining as
21 president?

22 "A EVP.

23 "Q Executive Vice President, excuse me. Is that
24 what you mean, not supportive?

25 "A Not supportive ultimately of Wayne."

1 MR. MASON: Your Honor, I don't know if, again, if
2 it's my issue or it may be our issue, but on 205 it appears
3 that, for whatever reason, the question was not designated
4 beginning on Line 19, so I would ask that we be permitted to
5 start on 205, Line 19.

6 THE COURT: Any problem with that? That sounds like
7 a fair request.

8 MS. PILATOWICZ: No objection, Your Honor.

9 THE COURT: Okay, you can start at 19, Mr. Mason.
10 (Deposition read.)

11 "Q All right. Let's go to the next exhibit, a note
12 from Colonel North from you. For the record, Exhibit
13 17 is a document turned over by the NRA to us, Bates
14 Stamp No. NRA AMC 59547. What is this note to Colonel
15 North?

16 "A The -- I at first understood in the afternoon
17 that a -- that Wayne was going to deliver a memo to --
18 Mr. LaPierre was going to deliver a memo to Colonel
19 North indicating that he had received Colonel North's
20 message and that he would not -- the Nominating
21 Committee would be -- was meeting several days later
22 and that he would not be supporting his re-nomination
23 for president. And at the end of the day, it was put
24 in front of me to sign."

25 MR. MASON: Your Honor, at this time, Exhibit 17

1 referenced is Ackerman 176.

2 MS. PILATOWICZ: And Your Honor, I'd object to the
3 admission. Exhibit 176 from the Ackerman exhibits has a
4 Bates number of NRA AMC 61214. The exhibit that's referenced
5 in the deposition has a Bates number of 59547. So it doesn't
6 appear to be the same document.

7 THE COURT: What do you say to that, Mr. Mason?

8 MR. MASON: Your Honor, what I would say to that is
9 if you could just give me -- there's actually -- there's
10 actually two different versions of this, and I don't know --
11 I don't know why. Let me see if I can find -- I believe it's
12 on our exhibit list.

13 THE COURT: Okay. Take your time.

14 MR. MASON: They're -- Kelsey, do you know which --
15 (Pause.)

16 THE COURT: While you're looking, I'm going to ask
17 my law clerk a question.

18 (Pause.)

19 THE COURT: Then, to add a problem, Mr. Mason, our
20 -- at least our electronic version doesn't go to 176. It
21 stops at 175, I think.

22 MR. MASON: I apologize, Your Honor.

23 THE COURT: It's okay.

24 MR. MASON: Just give me one second.

25 THE COURT: It's okay. It may be in our hard copy.

1 THE CLERK: No.

2 THE COURT: No? We're cut off at 175, I think, on
3 Ackerman exhibits.

4 MR. MASON: So, if I can -- I will try and see if I
5 can find it, but this is -- this is the Exhibit 17 to Ms.
6 Hallow's with the Bates numbers with the message at the top.

7 MS. PILATOWICZ: And Your Honor, I'd still object.
8 If you -- if we go through the testimony about this document,
9 there's a discussion about there being a signed version and
10 that Ms. Hallow doesn't know if this is the version that
11 they're referring to.

12 MR. MASON: Your Honor, I think that this document
13 is important for a couple of reasons. She did testify to it.
14 And if you look at the next testimony, she says that this
15 note was put in front of her to sign and she said she did
16 sign it.

17 She also testified that the statement, I understand the
18 messages you delivered on behalf of yourself and Ackerman
19 McQueen during our call, she testifies or will testify that
20 there was no message that was delivered by Colonel North on
21 behalf of Ackerman McQueen. And so I believe this is an
22 admission by a party opponent. She identifies the document
23 in this particular -- in her deposition in the testimony that
24 we've cited right here.

25 MS. PILATOWICZ: And Your Honor, because we don't

1 have a copy of the exhibit and it's pretty small on the
2 screen, I can't even see it. If we can blow it up, maybe we
3 can address it?

4 THE COURT: Is there a way that it can be --
5 (Pause.)

6 MS. PILATOWICZ: Your Honor, we have no objection to
7 the admission.

8 THE COURT: All right. And we are calling that --
9 that's 176; is that right?

10 MR. MASON: Your Honor, yes. Let's call it 176.
11 And then we will -- we will make that -- 176. We'll make
12 that change in the --

13 THE COURT: And is there a way you can just -- after
14 we're done, just send one over to Mr. Williams?

15 MR. MASON: Yes, absolutely.

16 THE COURT: Thank you.

17 (Ackerman McQueen's Exhibit 176 is received into
18 evidence.)

19 MR. MASON: Going back to Page 206, Line 9.

20 (Deposition read.)

21 "Q This note was put in front of you to sign."

22 MS. TAYLOR: I'm so sorry. I lost my place.

23 MR. MASON: Page 206, I'll read it again, Line --
24 beginning on Line 9.

25 (Deposition read.)

1 "Q This note was put in front of you to sign.

2 "A Yes.

3 "Q Did you sign it?

4 "A Yes. I signed it and I was asked to hand-deliver
5 it to Mr. North. And I would not do that. They --
6 this is primarily Josh Powell -- said send it to him
7 by email, and I did.

8 "Q Who prepared this document?

9 "A I'm not sure, but Josh Powell was the one that
10 put it in front of me. He had a hand in it, but I'm
11 not sure if he did that alone or not.

12 "Q Okay. For the record, this document is
13 addressed, Colonel North, I understand the messages
14 you delivered on behalf of yourself and Ackerman
15 McQueen respectively during our phone call.

16 Let me break that down. Did Colonel North give
17 you any understanding that he was speaking on behalf
18 of himself and Ackerman McQueen in that phone call?

19 "A Actually, not. I don't remember that and it's
20 not in my notes.

21 "Q Okay. And when he says the messages you've
22 delivered, is there -- is there just an improper use
23 of the word message? It's just one message, right?

24 "A It's just one message. Okay. Yeah, it's just
25 one message.

1 "Q Did you discuss with Josh Powell how you don't
2 think that he was speaking on behalf of Ackerman
3 McQueen when he had that phone call with you?

4 "A I didn't. I was -- I just was sort of by this
5 time kind of, why do I have to do this? So I really
6 didn't look so clearly at specifically that kind of
7 detail about what the letter said.

8 "Q And John Powell is your boss at this time; is
9 that right?

10 "A He was chief of staff. I -- I report to Wayne
11 LaPierre.

12 "Q But you were on staff, so he's chief of -- of the
13 staff?

14 "A Yes.

15 "Q So he came to you and said, sign this, and you
16 signed it without a lot of thought. Is that correct?

17 "A I would not characterize it without a lot of
18 thought. I was reluctant.

19 "Q But you signed it anyway?

20 "A I did."

21 MR. MASON: Your Honor, that concludes the Ackerman
22 deposition designation of Ms. Hallow.

23 THE COURT: Anything else from the Debtor? As I
24 understand it, the Debtor's portion was also read into the
25 record.

1 MR. GARMAN: That's correct, Your Honor. We have
2 nothing further on that witness.

3 THE COURT: Okay. Mr. Mason, is Ackerman prepared
4 to rest, subject to -- I've heard the comment subject to
5 calling a rebuttal witness, if that's appropriate, at the end
6 of the Debtors' case?

7 MR. MASON: We are, Your Honor.

8 THE COURT: All right.

9 MR. MASON: We are prepared to rest.

10 THE COURT: Okay. Mr. Garman, the case is going to
11 switch over to you tomorrow morning at 10:30.

12 MR. GARMAN: Okay.

13 THE COURT: You're standing at the podium, which is
14 always sort of dangerous for me, but do you have anything
15 that you need me to address this afternoon?

16 MR. GARMAN: Your Honor, I would like to address two
17 quick things. The first is, as I understand it, you have
18 incorporated the CRO motion, Mr. Robichaux's motion, into our
19 case in chief.

20 THE COURT: Uh-huh.

21 MR. GARMAN: So it's not our intent to treat it
22 separately. It's our intent to build the relevant testimony
23 into each of the witnesses. Probably call Mr. Robichaux at
24 the end -- towards the end of the week, would be my
25 expectation. But one, I just wanted to make sure that was

1 consistent with your instructions.

2 THE COURT: It is. I think I've said this before. I
3 heard the rumblings and then had a chance to look at the
4 motion, and I anticipated that that was going to be part of
5 your case in chief, so -- and I think it's --

6 MR. GARMAN: Yes, sir.

7 THE COURT: -- going to be important that you put it
8 on during your case in chief.

9 MR. GARMAN: Okay. I, too, think -- I think that
10 makes sense. I just wanted to make sure I didn't take a
11 misstep.

12 And second, Your Honor, I know that you said part-day on
13 the 29th and the 30th. I will certainly -- we will certainly
14 accommodate those days. I will say I'd like to raise one
15 concern, Your Honor, which is you will hear testimony, but you
16 haven't heard it yet, that we have scheduled a board meeting
17 for Saturday the 1st to address a plan of reorganization by
18 the board to file with the Court. The board meetings,
19 including the Bylaws Committee, the Finance Committee, and
20 Legal Affairs Committees, do meet the -- earlier, which would
21 be the 29th and/or the 30th.

22 I will be here in court, but if it were possible I would
23 say I would like to spend next week -- the primary architect
24 of the plan is Mr. Neligan. I don't want there to be any
25 confusion on that point. But certainly I think there's some

1 hope and expectation this'll be a team effort. If we could do
2 it the 3rd, 4th, 5th, or some other day, I would appreciate
3 it. But if not, I will be -- I will be standing at this
4 podium on the 29th.

5 THE COURT: What I would say is why don't y'all talk
6 a little bit. I think you've done a marvelous job, with
7 clients that are having significant issues between them, of
8 looking at calendars and things like that.

9 That's our trial week. Typically, we have some vacancies
10 because we don't have a lot of things going to trial right
11 now. I do know that on that Monday of our trial week we have
12 a confirmation hearing, so I've already slipped something in n
13 it which is not a trial.

14 But why don't y'all talk about proper use of time. I
15 can't do it the first three days of next week. I have
16 something I can't get out of. But we'll try to accommodate
17 schedules.

18 MR. GARMAN: Yes, sir.

19 MR. PRONSKE: Your Honor? Your Honor, if I may be
20 heard briefly. This is Gerrit Pronske for the New York
21 Attorney General. And I just want to state for the record
22 that we would oppose not being able to be heard next week. We
23 think this matter needs to conclude. The Debtors spent
24 \$1,300,000 before bankruptcy, prior to this case, and the fact
25 that a plan has not been prepared, approved by the board, is

1 not something that we think should generate more time for this
2 trial. We'd like to get this matter resolved and heard. So
3 we would like for the Court to see if dates would be available
4 for next week. And, of course, we can hear more about this
5 later on the week, but we do oppose leaving things to the
6 following week.

7 Thank you.

8 THE COURT: Now, Mr. Pronske, I heard you, but
9 remember that we just finished yesterday the seventh day
10 before the NRA -- or today, I guess, the seventh day. So I am
11 concerned about that comment that you just made.

12 We'll be in recess.

13 (Proceedings concluded at 4:16 p.m.)

14 --oOo--

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CERTIFICATE

20 I certify that the foregoing is a correct transcript from
21 the electronic sound recording of the proceedings in the
above-entitled matter.

22 **/s/ Kathy Rehling**

04/21/2021

23

Kathy Rehling, CETD-444
Certified Electronic Court Transcriber

Date

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