

EXHIBIT 19

In The Matter Of:

*NRA v.
Ackerman McQueen*

Carolyn Meadows

January 29, 2020

CONFIDENTIAL -- UNDER PROTECTIVE ORDER



Min-U-Script® with Word Index

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2

3 MEADOWS

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1 EXHIBITS CONTINUED

2 MEADOWS

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15 (Original Exhibits attached to the
16 original transcript.)

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20
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22

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1 PROCEEDINGS

2 * * *

3

4 CAROLYN MEADOWS,

5 a witness called for examination, having been

6 first duly sworn, testified as follows:

7 * * *

8 EXAMINATION

9 BY MR. SCHERTLER:

10 Q. Ms. Meadows, good morning.

11 A. Good morning.

12 Q. My name is David Schertler. I am

13 here with my colleagues Paola Pinto and David

14 Dickieson to her left. And we are attorneys that

15 are representing Ackerman McQueen in litigation

16 between Ackerman McQueen and its subsidiary,

17 Mercury Group, and the National Rifle Association

18 of America.

19 Those cases are, have been filed in

20 the local Alexandria City Court, what we call

21 Circuit Court of the City of Alexandria.

22 Are you familiar with these matters?

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1 A. Yes.

2 Q. And, of course --

3 MR. COLLINS: I'm sorry, is it being

4 taken just in the Virginia action and not the

5 Texas action? Although, we are talking about

6 an agreement to allow it to be used.

7 BY MR. SCHERTLER:

8 Q. Yes. Our understanding is that the,

9 your deposition has been noticed only in the

10 Virginia actions?

11 There, as you may know, are similar

12 lawsuits have been filed both ways in federal

13 court in Texas.

14 But, as far as we are aware, your

15 deposition is not being taken in that case today.

16 Do you understand that?

17 A. Yes.

18 Q. Okay. So, have you had your

19 deposition taken before?

20 A. No.

21 Q. It is simple. I will be asking

22 questions on behalf of the Ackerman McQueen. My

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1 colleague David Dickieson, after I am done, may
2 have some follow-up questions on behalf of the
3 other defendant in the case, Mercury Group. And
4 then your counsel will have the ability, if they
5 would like, to ask you some questions as well at
6 the end.
7 We are hoping to try to accomplish
8 this within the day. And I am confident we can
9 do that, and hopefully shorter as opposed to
10 longer.
11 And I will do everything I can to
12 expedite that process.
13 We do appreciate you coming up from
14 Georgia for this deposition.
15 So, I will ask questions. You will
16 provide answers. Obviously you are represented
17 by counsel, Mr. Collins and Mr. Hundley here.
18 They may have objections to certain
19 questions I ask.
20 Typically what will happen is, their
21 objection is what we call for the record. And
22 they will instruct you, they will allow you to

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1 answer the question even if they object.
2 There may be some questions where
3 they say they would instruct you not to answer
4 based on what we call potentially privileged
5 communications.
6 And then they will advise you on
7 that if they feel it is necessary.
8 So, what I plan to do is go through
9 a number of topics that relate to the issues in
10 the lawsuits.
11 I have, probably 25 documents that I
12 will show you and ask you some questions about
13 those documents.
14 If you have any questions about, you
15 know, understanding my questions, let me know and
16 I will try to make it simple and clearer.
17 So, let me start out by saying were
18 you able to do anything to prepare for your
19 deposition today?
20 A. Yes.
21 Q. And could you just describe briefly
22 what you did?

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1 A. Met with counsel.
2 Q. And in meeting with counsel were you
3 able to review any documents that were related to
4 the case?
5 A. Actually no.
6 Q. Okay. In the Virginia lawsuits,
7 there are actually three separate what we call
8 complaints or lawsuits that were filed by the NRA
9 against the Ackerman McQueen.
10 Are you familiar with those
11 lawsuits?
12 A. Some.
13 Q. Have you ever read the actual
14 complaints?
15 A. No.
16 Q. So, what would your awareness or
17 familiarity with the complaints, you know, what
18 is alleged in the complaints, what would that be
19 based on?
20 A. Breach of contract.
21 Q. But, has somebody, if you haven't
22 read the complaints themselves, has somebody told

Page 12

1 you about what this is?
2 A. Yes.
3 Q. Okay. And when you say breach of
4 contract, what contract are you referring to?
5 A. Actually I don't know which one. I
6 don't know.
7 Q. Presumably -- I'm sorry to
8 interrupt.
9 Presumably a contract between
10 Ackerman McQueen and the NRA?
11 A. Correct.
12 Q. And just for simplicity, I will
13 refer to Ackerman McQueen to include Ackerman
14 McQueen and Mercury, if that is okay with you.
15 And when I say NRA obviously we are
16 referring to the National Rifle Association of
17 America.
18 So, just, a standard question that
19 we ask everyone, is there anything that might
20 prevent you from being able to understand the
21 questions being asked or answer the questions
22 that are being asked today?

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1 A. No.
2 Q. Okay. Then, let me start with this.
3 Could you just briefly describe your
4 background? Maybe starting with education and
5 then your -- I know you have had a long career
6 professionally and personally.
7 But, can you describe your
8 background for us?
9 A. I grew up in rural Cog County,
10 Georgia on a farm. Learned to hunt and shoot
11 very early in life.
12 My father was very political. He
13 died when I was 11. I figured the mantel fell on
14 me. I have been involved, literally, in politics
15 since the eighth grade.
16 Served as Georgia's Republican
17 National Committeewoman for 12 years. I serve on
18 several boards. I am active in the community. I
19 love sports.
20 Q. Georgia sports?
21 A. Well, if a Manning suits up, then I
22 understand the last Manning will not be suiting

Page 14

1 up.
2 But, from Archie, Peyton, all of
3 them, I loved that.
4 But, I like baseball, my Atlanta
5 Braves.
6 I am a huge sports fan,
7 participating and watching.
8 Q. Have you ever been, have you ever
9 been in elected office?
10 A. No. I was elected national
11 committeewoman.
12 But, not public office.
13 Q. And, do you hold with one political
14 party or the other?
15 A. Always.
16 Q. And would that be the Republican
17 Party?
18 A. Yes.
19 Q. Could you describe your background
20 with the NRA, your history with the NRA?
21 A. Sure. In the '90s I did not-for-pay
22 lobbying for NRA in, with the Georgia legislature,

Page 15

1 and with the Congressional delegation.
2 I actually went on the board in
3 2003. But, I knew Wayne LaPierre long before
4 that and was active.
5 Q. Can I ask you how you met
6 Mr. LaPierre?
7 A. At a fund-raising event.
8 Q. For the NRA?
9 A. Actually for a political candidate.
10 Q. And, after you met Mr. LaPierre, did
11 you develop a professional or personal
12 relationship with him?
13 A. Professional, yes.
14 Q. And what was that relationship? How
15 would you describe it?
16 A. Very good.
17 Q. And then you said you became a
18 member of the NRA Board in 2003?
19 A. Correct.
20 Q. Had you actually been a member of
21 the NRA before that?
22 A. No.

Page 16

1 Q. At that point did you become what
2 they call a card-carrying member of the NRA?
3 A. I actually was a card-carrying
4 member. I was not a board member.
5 Q. I see. So, you were a member of the
6 NRA but not a board member?
7 A. That's correct, yes. Yes.
8 Q. In 2000?
9 A. I became a board member in '03.
10 Q. And how did you become a board
11 member?
12 A. I was asked.
13 Q. By Mr. LaPierre?
14 A. And Charlton Heston.
15 Q. And Charlton Heston.
16 The -- when you became a board
17 member in 2003, did you hold any other type of
18 office or employment with the NRA at that time?
19 A. No.
20 Q. Did there come a time when you took
21 on additional responsibilities as an officer or
22 employee of the NRA?

Page 17

1 A. I was never an employee and didn't
2 become in officer until '18. 2018.
3 Q. And is it fair to say that, am I
4 correct that in 2018 you became what was referred
5 to as the second vice president of the NRA?
6 A. Yes.
7 Q. And can you tell me how that came
8 about?
9 A. I ran for election. Several people
10 asked me to run and I agreed.
11 Q. And so, the position you ran for and
12 were elected to was the second vice president
13 position of the NRA?
14 A. Yes.
15 Q. And, am I correct, I'm a little bit
16 new to the NRA.
17 But is that considered an officer
18 position for the NRA?
19 A. Yes.
20 Q. And, would that have been at the
21 same time that Oliver North had been elected as
22 president of the NRA?

Page 18

1 A. No.
2 Q. Would it have been when Mr. Brownell
3 was still president of the NRA?
4 A. Yes.
5 Q. So, that would have been, time wise,
6 earlier in the 2018 calendar year?
7 A. Yes.
8 Q. So at that point when you first
9 become his second vice president, who was the
10 first vice president?
11 A. Richard Childress.
12 Q. And, just briefly, how well did you
13 know Mr. Brownell?
14 A. He was not a personal friend. An
15 acquaintance.
16 Q. How about Mr. Childress?
17 A. The same.
18 Q. So, these were people that you
19 knew -- were these people that you knew through
20 the NRA affiliation or through other business,
21 professional affiliations?
22 A. Through NRA.

Page 19

1 Q. So, could you tell me, what were
2 your responsibilities as the second vice
3 president of the NRA, in that officer position?
4 A. The first would be if the president
5 and first vice president could not preside, then
6 I would.
7 The one other responsibility would
8 be to attend functions and wave the NRA flag.
9 Some ceremonial.
10 Q. Uh-huh.
11 A. And, contracts over \$100,000 I would
12 sign.
13 Q. So, would contracts over \$100,000
14 under the NRA rules require your signature as
15 well as the signature of the first vice president
16 and the president?
17 A. Yes.
18 Q. And where is that in the NRA rules
19 if you know?
20 A. I don't know.
21 Q. Who elected, who is, does do the
22 electing of the president, the first vice

Page 20

1 president and the second vice president at the
2 NRA?
3 A. The 76 board members.
4 Q. So, you are elected by the board
5 members; is that correct?
6 A. Yes.
7 Q. Does it have to be the majority of
8 the board members?
9 A. Yes.
10 Q. When you ran for second vice
11 president, were you running against anybody?
12 A. No.
13 Q. And I think you said that you were
14 asked to put your name in the so-called ring for
15 that position by, would it be by Mr. LaPierre?
16 A. Yes.
17 Q. Did Mr. LaPierre tell you why he
18 thought it would be good for you to be the, put
19 your hat in the ring for second vice president?
20 A. Yes.
21 Q. Could you tell us why?
22 A. Because I am political. And he felt

Page 21

1 like my experience would be beneficial.
2 And, I had worked with the NRA for a
3 lot of years.
4 Q. And, prior to -- had you been a
5 constant member of the board between 2003 and
6 2018 when you were elected as second vice
7 president?
8 A. Yes.
9 Q. And, when you became second vice
10 president, you remained a member of the Board of
11 Directors; is that correct?
12 A. Correct.
13 Q. Is it also fair to say that at that
14 time, and I'm kind of focusing now on 2018, were
15 you also a member of what they call the audit
16 committee of the board of directors?
17 A. Yes.
18 Q. How long had you been a member of
19 the audit committee of the board of directors?
20 A. I was appointed by Pete Brownell in
21 July of 2018.
22 Q. So, that was the first time that you

Page 22

1 became a member of the audit committee in July of
2 2018?
3 A. Yes.
4 Q. At that time you were already second
5 vice president?
6 A. Yes.
7 Q. And Mr. Brownell at that time, in
8 July of 2018, would have still been the president
9 of the NRA?
10 A. Yes.
11 Q. Did you hold any position within the
12 audit committee?
13 A. No.
14 Q. Who was the chair of the audit
15 committee at that time?
16 A. Charles Cotton.
17 Q. Approximately how many members of
18 the board were members of the audit committee?
19 MR. COLLINS: At any point in time
20 or --
21 BY MR. SCHERTLER:
22 Q. At that point in time in 2018 when

Page 23

1 you became a member.
2 A. The rules stipulate five. Five
3 members.
4 Q. And in July of 2018 when you became
5 a member, I assume Mr. Cotton was the chair, but,
6 and you were a member.
7 Do you know, can you tell us if you
8 recall who the other members of the audit
9 committee were at that time?
10 A. Yes.
11 Q. Who were they?
12 A. David Coy who is vice chair, Herb
13 Lanford and Curtis Jenkins.
14 Q. Okay. Thank you.
15 Could you tell us, could you
16 describe for us what the responsibilities are of
17 the audit committee of the board?
18 A. To hire auditing firms, if there are
19 whistle blower complaints to hear those. Looking
20 at contractual agreements between board members.
21 Q. When you say contractual agreements
22 between board members, contractual agreements

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1 between board members and --
2 A. They were --
3 Q. -- third parties?
4 A. Yes.
5 Q. Not, their contractual agreements
6 with the NRA?
7 A. Actually, they are, we, they are
8 paid by NRA.
9 Q. Board members do get some
10 compensation from the NRA?
11 A. If they provide a service, yes.
12 Q. A service separate and apart from
13 being a board member?
14 A. Correct.
15 Q. So, as a board member, just in and
16 of itself, do you receive any compensation for
17 that service?
18 A. No.
19 Q. So, that is completely
20 uncompensated; it is volunteer.
21 A. Correct.
22 Q. As the second vice president, do you

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1 receive any compensation from the NRA?
2 A. No.
3 Q. So, no compensation in that regard.
4 So, let's just talk about 2018.
5 Did you provide any services to the
6 NRA in calendar year 2018 that would have
7 resulted in the NRA providing you with some
8 payment or compensation?
9 A. No.
10 Q. Just jumping to 2019, in that
11 calendar year, did you provide any services to
12 the NRA that would have resulted in compensation
13 to you from the NRA?
14 A. No.
15 Q. Do you have compensation -- while
16 you were holding this position, both as a
17 director and as the second vice president of the
18 NRA beginning in 2018, did you have other
19 professional work that you were conducting
20 separate and apart from the NRA?
21 A. Yes.
22 Q. Could you tell us, just describe

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1 briefly what that work was?
2 A. I serve on other boards.
3 Q. So, you serve as a director on
4 boards of other companies or entities?
5 A. Yes.
6 Q. And is it fair to say that you
7 receive some compensation in connection with
8 those services?
9 A. No.
10 Q. Is, do you have -- the 2018-2019, do
11 you have any source of compensation from work?
12 A. No.
13 Q. So, is it fair to say that whatever
14 resource you are living off, resources that you
15 have accumulated over time?
16 A. Yes.
17 Q. Personal finances.
18 A. Yes.
19 MR. COLLINS: And David, just, when
20 you say compensation, that does not include
21 reimbursement of expenses.
22 MR. SCHERTLER: No.

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1 MR. COLLINS: Okay, got you.
2 MR. SCHERTLER: That would be a
3 separate thing that I would ask about.
4 MR. COLLINS: Okay, thank you.
5 MR. SCHERTLER: I'm talking about
6 just compensation in the form of salary or
7 some ...
8 MR. COLLINS: That is what I
9 thought.
10 MR. SCHERTLER: Whether it was 1099
11 or W-2.
12 MR. COLLINS: That is what I
13 thought.
14 BY MR. SCHERTLER:
15 Q. So, let's just go back to the middle
16 of 2018.
17 At that point, you were two things
18 with the NRA, you were a member of the board and
19 in particular a member of the audit committee.
20 But you were also serving as an
21 officer, as second vice president?
22 A. Correct.

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1 Q. So, I guess maybe I will jump into
2 what Mr. Collins had alluded to.
3 Does the NRA provide you with
4 reimbursement for expenses that you incur that
5 are related to work you are performing for the
6 NRA?
7 A. Repeat, repeat the question.
8 Q. Yes, ma'am. Just for instance, if
9 you have to travel for, to attend a meeting of
10 the NRA board, such as the annual meeting in
11 Indianapolis or somewhere else, would the NRA pay
12 your expenses, your travel expenses, your room
13 and board for those trips?
14 A. Yes.
15 Q. And, how does that work? Do you
16 actually incur those expenses and then file a
17 request for reimbursement from the NRA?
18 A. Both.
19 Q. And, so when you say both, so,
20 sometimes the NRA will pay those expenses
21 directly?
22 A. Yes.

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1 Q. And is there accounting of those
2 expenses that you have to maintain?
3 A. Absolutely.
4 Q. And, who do you submit that
5 accounting to?
6 A. To the secretary's office.
7 Q. Okay. And other than travel,
8 lodging, meals, are there any other expenses that
9 the NRA reimburses for you?
10 A. No.
11 Q. No clothing expenses?
12 A. No.
13 Q. And when you travel, how do you
14 travel?
15 A. By plane.
16 Q. Regular commercial airline?
17 A. Some expenses by car.
18 Q. Okay.
19 A. If there were a board meeting in
20 Birmingham, Alabama, I would drive. It would be
21 faster.
22 Q. Understood. Have you ever been

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1 reimbursed for travel out of the country on
2 behalf of the NRA?
3 A. No.
4 Q. And just, I apologize.
5 But, just as a, to cover all of the
6 bases, is it fair to say that the NRA does not
7 pay for any of your personal expenses?
8 A. That would be fair to say.
9 Q. Okay. And is it fair to say that
10 you would think it improper for the NRA to pay
11 for personal expenses?
12 MR. COLLINS: Objection to the form.
13 But you can answer if the you can.
14 THE WITNESS: Whose expenses.
15 BY MR. SCHERTLER:
16 Q. Your personal expenses. Would you
17 believe it would be improper for the NRA to pay
18 for your personal expenses?
19 A. Well it would depend on what they
20 are.
21 Q. Well, let's say clothing.
22 A. No. Not for a board member.

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1 Q. And just so I understand.
2 So, would it be appropriate or
3 inappropriate for the NRA to pay for the clothing
4 for a board member?
5 A. Inappropriate.
6 Q. Okay. If I could just get a sense.
7 When you became the second vice president and
8 were also serving on the board, could you just
9 give us some sense of what amount of your time
10 did those positions consume in terms of work that
11 you were doing either as a director or a second
12 vice president, was it, you know, all day, five
13 days a week?
14 Was it part-time? How would you
15 describe it?
16 A. Part-time.
17 Q. And generally speaking, could you
18 just give us an idea of what would be the things
19 that you would be doing as second vice president
20 or director?
21 A. One thing that would consume a lot
22 of time would be phone calls from board members,

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1 asking questions, that type thing.
2 Q. Okay. And I assume attending
3 meetings, NRA-sponsored meetings, would that also
4 take up some of your time?
5 A. Yes.
6 Q. The, would there be days when you
7 would have to, you know, you wouldn't do anything
8 related to your positions with the NRA?
9 A. Very few.
10 Q. Okay. Most of the work that you
11 were doing, were you able to conduct from either
12 your home in Georgia?
13 A. Yes.
14 Q. So, it didn't require you to have an
15 actual office anywhere.
16 A. No.
17 Q. Did they provide an office for you
18 at headquarters here in Virginia?
19 A. Yes. Yes.
20 Q. And did you, did you frequent that
21 office?
22 A. No.

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1 MR. COLLINS: Just once in a very
2 short while sometimes you are speaking before
3 he is finished.
4 THE WITNESS: Sorry.
5 MR. SCHERTLER: I thought she was
6 actually doing very well.
7 MR. COLLINS: I think she is.
8 Absolutely. Just, something. He sometimes
9 will pause, but he is not done with his
10 question yet.
11 BY MR. SCHERTLER:
12 Q. So, if I have this correctly, then,
13 at different times in, and again I'm focusing
14 this on your NRA duties.
15 A. I apologize. These help my voice.
16 So ...
17 Q. No, listen, go right ahead.
18 And it doesn't show up in the
19 transcript.
20 A. It is okay if they do.
21 Q. So, I think you say you engaged in
22 meetings and phone conferences with other board

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1 members and potentially other NRA employees, is
2 that fair to say?
3 A. Yes.
4 Q. In the course of your meetings,
5 NRA-related or your phone conferences,
6 NRA-related, do you ever, do you make a record of
7 those meetings or discussions such as by taking
8 notes?
9 A. Yes.
10 Q. What is your practice? I know what
11 my practice is when I'm at the phone, but could
12 you describe how you memorialize your
13 conversation that you might have with another
14 director or NRA employee on the phone?
15 A. I abbreviate messages.
16 Q. And do you keep a record of those
17 messages?
18 A. I did. Yes.
19 Q. Do you still have those, the, your
20 notes of phone calls or meetings?
21 A. No.
22 Q. What happened to them?

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1 A. I destroyed them.
2 Q. When did you destroy them?
3 A. Earlier last year, earlier in the
4 year.
5 Q. So, that would be earlier in 2019?
6 A. Yes.
7 Q. Do you know, was there a reason why
8 you destroyed those records?
9 A. I was told they could be subpoenaed
10 and used.
11 Q. Who told you that they could be
12 subpoenaed and used?
13 A. John Frazer.
14 Q. And did he advise you to destroy
15 those documents?
16 MR. COLLINS: I guess we shouldn't
17 talk about what advice he gave you.
18 But, you could say whether he gave
19 you advice, not what the advice was. It is a
20 yes or no.
21 BY MR. SCHERTLER:
22 Q. Did he give you advice?

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1 A. Yes.
2 Q. And based on that advice, did you
3 destroy your notes and records?
4 A. Yes.
5 Q. Do you know whether at that time NRA
6 employees or board members were under what we
7 call a retention notice to preserve any documents
8 based on investigations potentially by the New
9 York State Attorney General's Office?
10 A. Yes.
11 Q. Were you under such a retention
12 notice at the time? Preservation notice?
13 A. My records were destroyed before
14 that date.
15 Q. Before that date?
16 A. Yes.
17 Q. But you destroyed your records so
18 that they couldn't be subpoenaed in connection
19 with some type of investigation?
20 MR. COLLINS: Objection to the form.
21 BY MR. SCHERTLER:
22 Q. I'm sorry. Is that right?

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1 A. Repeat, please.
2 Q. Yes, ma'am. So, you destroyed your
3 personal notes and records of communications that
4 you might have had with other NRA board directors
5 or other NRA employees so that they wouldn't be
6 available, or they couldn't be subpoenaed by a
7 government investigating agency or in connection
8 with a lawsuit?
9 MR. COLLINS: Objection to the form.
10 BY MR. SCHERTLER:
11 Q. So, you can answer it.
12 MR. COLLINS: You can answer it.
13 THE WITNESS: That would not be the
14 reason.
15 BY MR. SCHERTLER:
16 Q. What was the reason then?
17 A. It was my personal notes.
18 Q. What, when you say personal notes,
19 you are talking about personal notes based on
20 your work, the work you were doing with the NRA?
21 A. No.
22 Q. So, let me just take an example.

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1 If you had a discussion with an NRA
2 board member about NRA business, would you take
3 notes? Would you prepare notes of such a
4 conversation?
5 A. Some.
6 Q. And, were those notes destroyed?
7 MR. COLLINS: You can answer that
8 question, if you can.
9 THE WITNESS: They were my opinion
10 of the conversation.
11 BY MR. SCHERTLER:
12 Q. Understood. Were they destroyed?
13 A. Yes.
14 Q. Okay. So, notes that you would have
15 taken about meetings within the NRA or
16 conversations you had with other NRA
17 directors/employees, were destroyed in early
18 2019. Correct?
19 A. Yes.
20 Q. So, those no longer exist?
21 A. Correct.
22 Q. Did you stop taking notes after that

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1 point?
2 A. Yes.
3 Q. Okay. Did you have any concerns at
4 that time that if you destroyed those records and
5 notes that it might be considered an effort to,
6 and I don't mean this in a -- but, an effort to
7 hide evidence that could potentially be used
8 later?
9 MR. COLLINS: Objection to the form.
10 But you can answer if you can.
11 THE WITNESS: No.
12 BY MR. SCHERTLER:
13 Q. Okay. And this was after you talked
14 to Mr. Frazer?
15 A. Yes.
16 Q. Do you know whether Mr. Frazer had
17 similar discussions with other NRA board members
18 or other NRA employees?
19 A. That's, I have no knowledge, no.
20 Q. How did you happen to have this
21 conversation with Mr. Frazer?
22 A. That is his job. He is my legal

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1 counsel.
2 Q. Did you consult with him about
3 whether you should keep your notes?
4 A. Absolutely.
5 Q. Okay. And, not going, not going
6 into exactly what he told you.
7 But, based on your conversation with
8 him, you ultimately destroyed those notes?
9 A. Yes.
10 Q. So, they no longer exist?
11 MR. COLLINS: Objection. I think
12 that is asked and answered. But -- fair to
13 say?
14 THE WITNESS: If I destroyed them,
15 they don't exist.
16 BY MR. SCHERTLER:
17 Q. How did you destroy them?
18 A. Some I shredded. And some I
19 actually burned.
20 Q. Okay. Do you, in the course of --
21 and really I don't want to get into any personal
22 stuff or any other business related matters.

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1 But I'm confining my questions to
2 NRA-related business.
3 In the course of your work as a
4 director or an employee, an officer of the NRA,
5 do you use an e-mail account to communicate with
6 other NRA employees or directors, or communicate
7 with other people in your capacity as an NRA
8 director or employee?
9 A. Yes.
10 Q. And that would be an e-mail address
11 that has NRAHQ.org or -- that would be an NRA
12 e-mail address. Correct?
13 A. Correct.
14 Q. Do you have a private e-mail
15 address?
16 A. Yes.
17 Q. Do you ever use your private e-mail
18 address for NRA work-related matters?
19 A. Yes.
20 Q. And have you been asked by the
21 attorneys to produce your private e-mails that
22 address, that involve NRA work-related matters?

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1 MR. COLLINS: You can answer that
2 yes or no.
3 THE WITNESS: Yes.
4 BY MR. SCHERTLER:
5 Q. And have you so produced those
6 e-mails?
7 A. Yes.
8 Q. Have you personally been the subject
9 of a subpoena from any governmental entity that
10 is conducting some kind of inquiry or
11 investigation into the NRA?
12 A. No.
13 Q. Have you been contacted by the New
14 York State Attorney General in connection with
15 their investigation of the NRA?
16 A. No.
17 Q. Have you been contacted by any other
18 state, local, or federal government agency in
19 connection with investigations or inquiries into
20 NRA matters?
21 A. No.
22 Q. Did you ever deal with the U.S.

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1 Attorney's Office in Washington, D.C. related to
2 their investigation of the NRA's involvement in
3 certain matters related to Russia?
4 A. No.
5 Q. I'm struggling with technology. And
6 my teenage kids, they know all about it.
7 But, so there is something I
8 understand called text messages.
9 And I just recently learned how to
10 use text messages to communicate.
11 Do you know what text messages are?
12 A. Absolutely.
13 Q. Okay. And I don't mean to be
14 insulting, but I'm going off my ignorance.
15 Do you use text messaging too?
16 A. Yes.
17 Q. And would that be off of a cell
18 phone that you would text?
19 A. Yes.
20 Q. And in, would you use texting to
21 communicate on NRA work-related matters?
22 A. Yes.

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1 Q. And again, same question, have you
2 been asked by your attorneys to provide them with
3 text messages related to your NRA work related
4 matters?
5 A. Yes.
6 Q. And have you provided those text
7 messages to your attorneys?
8 A. Yes.
9 Q. Do you use any -- so, this is where
10 I really get lost.
11 I know text messages, but I
12 understand there is like What's App and Instant
13 Messaging. Do you use any of those other forms
14 of communication to communicate?
15 A. To communicate with whom?
16 Q. With NRA, NRA work-related matters.
17 A. No.
18 Q. Not personally. So, I know we send
19 pictures to kids and, but none of that stuff?
20 A. No.
21 Q. So, it would be text messages, it
22 would be e-mail, and then the old-fashioned way,

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1 phone conversations or meetings?
2 A. Yes.
3 Q. Can I ask you a little bit about the
4 NRA Board of Directors?
5 As I understand it, there are a
6 total of, is it 76 directors on the NRA board?
7 A. Yes.
8 Q. And how are board members selected?
9 A. By ballot.
10 Q. And who votes for directors?
11 A. The 5 million NRA members.
12 Q. So, each member gets some kind of
13 paper ballot and they can send in their votes as
14 to who they would like to be on the board?
15 A. Yes.
16 Q. And then somebody counts those
17 ballots and announces who has been elected?
18 A. Yes.
19 Q. And you have been elected
20 consistently since 2003, correct?
21 A. Correct.
22 Q. What are your responsibilities as,

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1 just a board member of the NRA Board of
2 Directors.
3 And this is kind of separate and
4 apart from other responsibilities you might have
5 as a member of the audit committee.
6 A. All board members are assigned to
7 committees by the president.
8 So, they would work with those
9 individual committees.
10 Q. So you might be assigned to an
11 individual committee.
12 When you say by the president, would
13 that be the president of the NRA as opposed to
14 the executive vice president?
15 A. Yes.
16 Q. So, at that point in time in July,
17 Pete Brownell was the president? And then Oliver
18 North later became the president, correct?
19 A. Yes.
20 Q. And they would make the assignments
21 to the committees for the board members?
22 A. Yes.

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1 Q. And so is it fair to say that
2 depending on the committee that you were
3 appointed to you may have, that committee may
4 have special responsibilities within the board?
5 A. Yes.
6 Q. Other than the audit committee, what
7 other committees were you appointed to in 2018?
8 A. Finance, audit, of course. Oh, gee.
9 I think as president, actually I am an ex-officio
10 member of all, all of the committees.
11 Q. In your current position as
12 president of the NRA?
13 A. Correct.
14 Q. If we go back to just 2018, when you
15 were the second vice president, what committees
16 were you appointed to at that time?
17 A. Actually, I can't even tell you.
18 I have served on almost all
19 committees. So, you know, I could speculate.
20 Q. I don't need you to speculate. But,
21 you have had experience with almost all of the
22 committees of the board.

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1 A. Yes.
2 Q. As I understand it, the NRA is
3 registered as, I believe it is, considered a
4 501(c)(3) entity with the, in New York State.
5 Is that correct?
6 A. Correct.
7 Q. And what is your understanding of
8 the NRA's, the benefits that are conferred on the
9 NRA as being a 501(c)(3)?
10 MR. DICKIESON: Let me correct you.
11 It's 501(c)(4). Foundation.
12 BY MR. SCHERTLER:
13 Q. I apologize. So 501(c)(4). For the
14 National Rifle Association. What are the
15 benefits as a result of that status? Do you
16 know?
17 A. Yes.
18 Q. What is it?
19 A. We are exempt from fund-raising in
20 some areas.
21 Q. And when you say exempt from
22 fund-raising, is it a tax exemption from funds

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1 that you receive through fund-raising?
2 A. Yes.
3 Q. So, in other words, Uncle Sam is not
4 taking the same chunk out of the money that
5 you're getting in donations, like they take out
6 of my check?
7 A. Correct.
8 Q. And are you familiar at all with the
9 requirements that the NRA must meet in order to
10 remain as a 501(c)(4) organization under New York
11 State law?
12 A. Yes.
13 Q. Could you briefly tell us what you
14 know about those requirements?
15 A. It would have to do with political
16 campaigns.
17 Q. Uh-huh. And what about political
18 campaigns?
19 A. For me personally, not to go
20 endorse.
21 Q. I see. So to remain that status,
22 you cannot take, you cannot endorse political

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1 candidates?
2 A. Personally, no.
3 Q. And personally, because you are an
4 officer, or personally because you are a
5 director?
6 A. A director.
7 Q. Any other requirements you are
8 familiar with?
9 MR. COLLINS: Objection to the form.
10 Asking for a legal conclusion.
11 You can give your understanding.
12 THE WITNESS: I gave my
13 understanding.
14 BY MR. SCHERTLER:
15 Q. So, for instance, are you aware of
16 any disclosures that the NRA has to make to the
17 New York State authorities about, let's say what
18 we call related-party contracts?
19 A. That is not part of my job --
20 Q. Understood.
21 A. -- at all.
22 Q. And so is it fair to say you are not

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1 familiar with those requirements?
2 A. That would be fair.
3 Q. Whose job would that be?
4 A. The legal counsel, secretary, and
5 treasurer.
6 Q. Okay. And just, legal counsel,
7 would that be Mr. Frazer?
8 A. Correct.
9 Q. Secretary, who would that be?
10 A. Mr. Frazer. He holds both.
11 Q. He holds both of them. And the
12 treasurer?
13 A. Craig Spray.
14 Q. And would Mr. Woody Phillips have
15 preceded Mr. Spray as the treasurer?
16 A. Yes.
17 MR. SCHERTLER: At any point if you
18 would like to just take a break to stretch
19 your legs or whatever reason, let me know.
20 MR. COLLINS: Sure, maybe next five
21 minutes or ten minutes if you are about to
22 wrap up.

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1 MR. SCHERTLER: Yes, I've got some
2 discrete areas that we can try to wrap up
3 pretty quickly.
4 THE WITNESS: Sure, that is fine.
5 BY MR. SCHERTLER:
6 Q. So, let me see if I can just try to
7 put us on the same page chronologically.
8 But I think beginning in July of
9 2018 when you became or were elected second vice
10 president of the NRA, up until April 2019, you
11 served in that same position as second vice
12 president. Correct?
13 A. Yes.
14 Q. And at some point after you became
15 second vice president, Mr. Brownell was replaced
16 by Oliver North as the president. Correct?
17 A. Correct.
18 Q. But, through that entire time
19 Mr. Childress had remained as the first vice
20 president. Is that correct?
21 A. Correct.
22 Q. How was the president of the NRA

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1 elected?
2 A. By the 76 board members.
3 Q. So, could you just describe the, how
4 that would work.
5 So, who would put up a potential
6 candidate as president for the board to vote on?
7 A. The nominating committee.
8 Q. And who is the nominating committee?
9 A. They are appointed by the president.
10 Q. So, the nominating committee --
11 A. Well, let me back up.
12 Q. Yes, ma'am.
13 A. Actually, the nominating committee,
14 unlike other committees, would actually be
15 elected by the 76 board members.
16 Q. So there is a special nominating
17 committee that is elected by the board?
18 A. Correct.
19 Q. And how many people on that
20 nominating committee?
21 A. I think -- I'm not sure.
22 Q. Are they also board members?

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1 A. Both. Non-board and board.
2 Q. Would Mr. LaPierre be a member of
3 that nominating committee?
4 A. No.
5 Q. Does Mr. LaPierre have any
6 involvement in selecting the people on the
7 nominating committee?
8 A. No.
9 Q. Does he have any influence in the
10 selection of people on the nominating committee.
11 A. That would be -- I don't know that.
12 Q. Fair enough. Do you recall when
13 the --
14 Do you recall when the nominating
15 committee proposed Oliver North as president for
16 the NRA?
17 A. Are you asking for a date?
18 Q. Approximate, yes.
19 A. Yes.
20 Q. When would that be?
21 A. It would have been September of '18.
22 Q. And, typically the, what is the term

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1 of the president of the NRA?
2 A. Typically two years.
3 Q. Now, Mr. Brownell, if I'm
4 understanding correctly, had not served out a
5 two-year term. Is that correct?
6 A. Correct.
7 Q. Could you tell us what you know
8 about why Mr. Brownell did not serve out a
9 two-year term and why Oliver North was selected
10 by the nominating committee to replace him in
11 September of 2018?
12 MR. COLLINS: Objection to the form.
13 You can answer.
14 THE WITNESS: He said that it was
15 because of business concerns and family.
16 BY MR. SCHERTLER:
17 Q. Mr. -- Mr. Brownell said that?
18 A. He said that to the board.
19 Q. Were there other reasons that you
20 are aware of as to why Mr. Brownell was, did not
21 continue in his two-year term as president?
22 A. Those were the two I know of.

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1 Q. Was there any internal discussion
2 within the NRA that you were a part of or aware
3 of as to concerns about Mr. Brownell continuing
4 as a president because of his involvement in the
5 Russia investigation?
6 A. Not that I'm aware of.
7 Q. What do you know about how Oliver
8 North came to be selected or nominated to become
9 president.
10 Do you know anything about the
11 background of the discussions leading up to that?
12 A. Not really.
13 Q. Are you, do you have any -- are you
14 aware of whether or not Mr. LaPierre actually
15 approached Lieutenant Colonel North and asked him
16 if he would take on the position of president?
17 A. I do not know that.
18 Q. So, fair to say you were not
19 involved in any discussions earlier in 2018 with
20 Oliver North about the possibility of him leaving
21 Fox News and taking on a position with the NRA as
22 president?

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1 A. Say, rephrase.
2 Q. Yeah, I'm sorry. Did --
3 Were you aware of any efforts to try
4 to persuade Oliver North to leave Fox News and
5 become president of the NRA?
6 A. I heard that it was said. Yes.
7 Q. Could you tell us what you heard?
8 A. That he had been asked.
9 Q. And who had he been asked by, from
10 what you --
11 A. I don't recall.
12 Q. And do you know why Oliver North was
13 asked?
14 A. He is a national hero.
15 Q. Do you know any -- were you told
16 anything, and who told you that? Who told you
17 that he was asked?
18 A. I don't recall. There was general
19 discussion. But, I don't recall.
20 Q. Was this ever discussed within the
21 board about Oliver North being a potential
22 presidential candidate?

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1 A. It -- do you mean an open board
2 meeting?
3 Q. Yes.
4 A. No.
5 Q. Have you ever discussed with any of
6 the, within any of the board committees that you
7 were a part of about Oliver North as a potential
8 presidential candidate?
9 A. No.
10 Q. Did you ever have any discussions
11 with Mr. LaPierre about it?
12 A. Probably.
13 Q. Any recollection of those
14 discussions?
15 A. Not really. Not specific.
16 Q. Do you know whether Mr. LaPierre was
17 a supporter of Lieutenant Colonel North becoming
18 president of the NRA?
19 A. Yes.
20 Q. Did you, do you have any knowledge
21 or awareness of what financial, what discussions
22 there were about how Mr., Lieutenant Colonel North

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1 would be compensated if he left Fox News and
2 became president of the NRA?
3 A. Not directly.
4 Q. What did you know -- when you say
5 not directly, were there some discussions
6 indirectly that gave you some awareness or
7 knowledge of what was being discussed?
8 A. Yes, there was some.
9 Q. Could you tell us what you recall
10 about those indirect discussions?
11 MR. COLLINS: To the extent they
12 involve discussions with an attorney, if they
13 did, we will deal with that separately.
14 Or someone telling you about advice
15 received from an attorney, put that aside.
16 But, anyone else that you talked to
17 about it, you can tell him that.
18 THE WITNESS: Actually, the, I can
19 say the person I talked to about it.
20 MR. COLLINS: Yes.
21 THE WITNESS: Actually it was Ollie
22 North.

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1 BY MR. SCHERTLER:
2 Q. Okay. And what did Mr. North tell
3 you?
4 A. He said he had to make financial
5 arrangements with Fox before he could assume the
6 presidency.
7 Q. And do you know what kind of
8 financial arrangements he had to make with Fox?
9 A. I have no -- he did not tell me.
10 Q. Were you aware of the fact that he
11 had been employed by Fox prior to becoming the
12 president of the NRA?
13 A. Yes.
14 Q. And were you aware that he had a,
15 you know, fairly lucrative financial contract to
16 work for Fox as one of their commentators?
17 A. I don't know that.
18 Q. Was it your understanding that in
19 order to take on the position as president of the
20 NRA, there would have to be some kind of
21 compensation to Lieutenant Colonel North in order
22 to make up what he would be losing from Fox?

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1 MR. COLLINS: Objection to the form.
2 You can answer.
3 THE WITNESS: From whom?
4 BY MR. SCHERTLER:
5 Q. From anyone. Either Mr. North or
6 anyone else?
7 A. Yes.
8 Q. Can you tell us what you learned?
9 A. Ackerman McQueen.
10 Q. What did you learn from Ackerman
11 McQueen?
12 A. I didn't learn from them, I actually
13 learned from Colonel North.
14 Q. And what did you learn?
15 A. That he would be hired by Ackerman
16 McQueen.
17 Q. And why would he be hired by
18 Ackerman McQueen?
19 A. Part, I would know. But part would
20 be speculation, which I wouldn't answer.
21 Q. Understood. If you could just tell
22 us the part that you know.

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1 A. All right. You want to know what
2 his contractual agreement would be with the NRA?
3 Q. Yes. Ultimately I'm going to try to
4 get to that.
5 So, if you could short circuit me.
6 A. Well, I would rather not.
7 Q. You are smarter than I am.
8 Okay, so, you understood at some
9 point then, I think, from Lieutenant Colonel
10 North that he was going to enter into a contract
11 with Ackerman McQueen, correct?
12 A. Correct.
13 Q. And you learned that from Lieutenant
14 Colonel North?
15 A. Yes.
16 Q. Did anybody at the NRA confirm that
17 that would be the situation?
18 MR. COLLINS: Confirm to her?
19 MR. SCHERTLER: Yes.
20 MR. COLLINS: Okay, got you.
21 THE WITNESS: Yes.
22 BY MR. SCHERTLER:

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1 Q. And who confirmed that to you?
2 A. Wayne LaPierre.
3 Q. So, Mr. LaPierre told you that he
4 was aware of the fact that Lieutenant Colonel
5 North would be entering into a contact with
6 Ackerman McQueen?
7 A. Yes.
8 Q. And what would be the purpose of
9 that contract, as far as you knew, either from
10 your discussions with Mr. LaPierre, Oliver North
11 or anybody else?
12 A. NRA's contractual agreement with
13 Colonel North as an employee at AckMc would have
14 been to produce 12 events a year for us. For
15 NRATV, for the Hero series.
16 Q. So, would it be your understanding
17 then that whatever contract Oliver North entered
18 into with Ackerman McQueen would then be
19 reimbursed by the NRA?
20 A. No.
21 Q. So, what was your understanding of
22 whether the NRA would have any obligation to

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1 reimburse Ackerman McQueen for what Ackerman
2 McQueen was paying Oliver North?
3 A. None.
4 Q. No obligations at all?
5 A. None.
6 Q. Do you know now whether the NRA had
7 been reimbursing Ackerman McQueen for the
8 Ackerman McQueen's contract with Oliver North?
9 A. No.
10 Q. Do you know whether the NRA was
11 reimbursing Ackerman McQueen for obligations
12 Ackerman McQueen had to Dana Loesh for Ackerman
13 McQueen's contract with Dana Loesh?
14 A. No.
15 Q. So, your understanding, and just so
16 I --
17 A. And it is Lash.
18 Q. Lash, I'm sorry.
19 A. Okay.
20 Q. I didn't watch the program. The --
21 so, your understanding today is that if Ackerman
22 McQueen entered into a contract with Oliver North

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1 at the time he became president of the NRA, the
2 NRA had no obligation whatsoever to reimburse
3 Ackerman McQueen for that contract?
4 A. We had no obligation to reimburse
5 for North.
6 Q. So, whatever contract that Ackerman
7 McQueen had with North, Ackerman McQueen would
8 pay North out of its own funds?
9 A. That's correct. That is my
10 understanding.
11 Q. That was your understanding?
12 A. Yes.
13 Q. And you are not aware of the fact
14 that the NRA paid Ackerman McQueen for its
15 obligations to North under its contract with
16 North?
17 A. No.
18 Q. Are you aware of the fact that there
19 is -- I think we might have referred to this.
20 But, that there is a contract
21 between Ackerman McQueen and the NRA --
22 MR. COLLINS: Just a general --

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1 THE WITNESS: -- currently?
2 BY MR. SCHERTLER:
3 Q. No, not currently, I'm sorry. Let
4 me go back. I think any contract has been
5 terminated at this point.
6 Let me go back to 2018 into 2019.
7 Were you under -- first of all, you
8 understood that Ackerman McQueen provided
9 services to the NRA. Is that fair to say?
10 A. Yes.
11 Q. And what kind of services did
12 Ackerman McQueen provide to the NRA, as far as
13 you were aware?
14 A. Speech writing, ads that would have
15 been on TV, slogans, that type of thing, PR.
16 Q. And, were you aware of the fact that
17 there was a contract between Ackerman McQueen and
18 the NRA that governed the, those services that
19 Ackerman McQueen was providing in exchange for
20 payment?
21 A. Correct.
22 Q. Are you aware of the fact that --

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1 have you ever read the contract?
2 A. No.
3 Q. Are you aware that it is, at least
4 entitled something, it is called the Services
5 Agreement.
6 Did you know that?
7 A. Yes.
8 Q. But you have never read the contract
9 itself?
10 A. No.
11 Q. Did you ever read an addendum to the
12 contract that had been entered into in May of
13 2018?
14 A. No.
15 Q. You have never read that addendum?
16 A. No. I know it exists.
17 Q. So, if I were to ask you what the
18 terms of that addendum are, do you have any
19 awareness of what the terms are?
20 A. No.
21 Q. Fair to say the same thing about the
22 Services Agreement? That you would not know the

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1 terms of the specifics of the Services Agreement?
2 A. That would be fair.
3 Q. And, in your role, in your role as
4 second vice president, was that ever something
5 that you needed to know or needed to understand?
6 MR. COLLINS: Objection to form.
7 THE WITNESS: No.
8 BY MR. SCHERTLER:
9 Q. In your role as a member of the
10 audit committee of the Board of Directors, was
11 that something that you ever needed to know or
12 understand?
13 MR. COLLINS: Objection to the form.
14 THE WITNESS: Yes.
15 BY MR. SCHERTLER:
16 Q. So, could you explain that to me, as
17 part of the audit committee, what did you need to
18 know about the Services Agreement or any addendum
19 to the Services Agreement?
20 A. We needed a copy to read.
21 Q. Of the Services Agreement?
22 A. Yes.

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1 Q. And now I'm talking about the
2 Services Agreement between Ackerman McQueen and
3 the NRA.
4 A. Yes.
5 Q. Did you have a copy of the Services
6 Agreement to read?
7 A. Not in audit.
8 Q. Why not?
9 A. I don't know.
10 Q. But, the NRA would have had the
11 contract, wouldn't it?
12 A. It, I, I don't know that.
13 Q. So, you never --
14 A. I would think so.
15 Q. But you never, were you never able
16 to see it?
17 A. No.
18 Q. But that is something you would have
19 wanted to see as a member of the audit committee?
20 A. At some point, yes.
21 Q. The Services Agreement and the
22 Addendum?

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1 A. At some point, yes.
2 Q. Did you ever ask for it?
3 A. No, not personally.
4 Q. When you say not personally, did
5 somebody ask for it?
6 A. Charles Cotton did.
7 Q. And who did he ask?
8 A. I don't know.
9 Q. Was his request denied, if you know?
10 A. I don't know.
11 Q. But you never saw it?
12 A. No.
13 Q. Despite Mr. Cotton's request?
14 A. Correct.
15 Q. And again I'm just -- we are talking
16 about the Services Agreement between Ackerman
17 McQueen and the NRA. Correct?
18 A. Correct.
19 Q. And then the Addendum I think you
20 are aware of but that you never saw?
21 A. Correct.
22 Q. You on the audit committee were

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1 never provided with copies of those to review and
2 read?
3 A. I don't know that. I, I don't
4 recall.
5 Q. You don't recall ever being given a
6 copy of it?
7 A. I do not.
8 Q. But that is something that you would
9 have wanted to see and read?
10 A. I would. At one meeting that, the
11 September meeting, I was not present. I was over
12 the phone.
13 Q. And we are talking about
14 September 2018, correct?
15 A. Correct.
16 Q. And that would have been the meeting
17 where the board had, the audit committee had
18 reviewed and approved the -- do you want me to
19 finish or do you want --
20 MR. COLLINS: If I could explain
21 something.
22 MR. SCHERTLER: Sure.

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1 MR. COLLINS: I think we are getting
2 confused between an agreement, I'm not trying
3 to -- do you want her to step out, Dave?
4 MR. DICKIESON: Yes, let's have her
5 step out.
6 MR. SCHERTLER: No, no. Let me just
7 go on --
8 MR. COLLINS: Think she is confusing
9 contracts.
10 MR. SCHERTLER: I think I tried to
11 make it pretty clear, but --
12 MR. COLLINS: Oh, no, I'm not saying
13 you didn't.
14 THE WITNESS: And you did, service
15 contract as opposed to a four-year contract.
16 BY MR. SCHERTLER:
17 Q. Yes, so a services agreement is what
18 I am referring to?
19 MR. COLLINS: Let's have her step
20 out for just one minute. I just think this
21 will help, I really do for the record
22 purposes, but maybe not.

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1 That is why we are going to wait
2 until she steps outside.
3 MR. SCHERTLER: Why don't we just
4 take a break.
5 (Recess taken -- 11:08 a.m.)
6 (After recess -- 11:25 a.m.)
7 BY MR. SCHERTLER:
8 Q. So, let me go back to, I think you
9 had made a reference to September. And I would
10 like to take you to September of 2018.
11 Now, just so that we have the proper
12 frame of reference, at that point in time you
13 were, you had already been elected as the second
14 vice president for the NRA, correct?
15 A. Correct.
16 Q. And you were also a member of the
17 audit committee for the Board of Directors of the
18 NRA, is that correct?
19 A. Yes.
20 Q. And I think you made a reference to
21 the meeting in September of 2018 that you
22 attended by a phone conference.

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1 Is that correct?
2 A. Correct.
3 Q. So, let me show you what has been
4 marked as Meadows Exhibit Number 1.
5 (Meadows Exhibit Number 1
6 marked for identification.)
7 BY MR. SCHERTLER:
8 Q. Now I have just about 20 of these,
9 so, once we get through the first few, we can
10 start knocking them out.
11 And, what I will do Ms. Meadows is
12 give you the original and then that original will
13 go to the court reporter after we are done.
14 What I would like you to do is just
15 please take a look at the document and, you know,
16 at some point I will ask you whether you are
17 familiar with it.
18 But I need to give you time to read
19 it.
20 MR. COLLINS: David, are you going
21 to ask about the whole thing or is this?
22 MR. SCHERTLER: No, I want to make

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1 sure she is able to look at the whole thing
2 so that somebody doesn't accuse me of taking
3 something out of context.
4 And I'm really, I will ask you about
5 the first two pages. The other pages, maybe
6 just a few quick questions.
7 MR. COLLINS: I would agree, she is
8 taking some time to read that, if you want
9 her to do that off the record so it doesn't
10 go into your time, that would be fine.
11 MR. SCHERTLER: Thank you.
12 I guess we will go off the record.
13 MR. COLLINS: Until you are done.
14 (Recess taken -- 11:30 a.m.)
15 (After recess -- 11:36 a.m.)
16 BY MR. SCHERTLER:
17 Q. We will go back on the record. So
18 if I am correct, Ms. Meadows, it seems to be a
19 report of the Audit Committee. It is dated
20 September 8th and 9th of 2018.
21 And the body of the report seems to
22 describe various meetings and discussions held by

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1 the audit committee.
2 Is that a fair description of this
3 document?
4 A. Yes.
5 Q. And would these be normally
6 considered minutes of meetings held by the audit
7 committee?
8 A. Yes.
9 Q. If you go on the first page, the
10 last paragraph begins by saying, "The Audit
11 Committee met at the Westin Arlington Gateway,
12 Arlington, Virginia, September 6th of 2018."
13 It then goes on to describe the
14 committee members present were Charles Cotton,
15 chairman, you had mentioned him. David Coy, vice
16 chairman, Curtis Jenkins, Herbert Lanford, Jr.
17 Committee member Carolyn Meadows attended by
18 phone.
19 Would this have been the meeting
20 that you were referring to that you had attended
21 by phone in September of 2018?
22 A. Yes.

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1 Q. It describes other people in
2 attendance at that point.
3 But, if you jump to the second page,
4 it goes on in the second full paragraph which is
5 just one sentence, it says, "The committee went
6 into executive session at 12:40 p.m., and rose
7 from executive session at 2:33 having adopted the
8 following resolutions."
9 Could you explain to me what
10 executive session is?
11 A. It means that all of these people
12 listed in attendance with the exception for a
13 couple would have been asked to leave.
14 Q. Would it have included the members
15 of the audit committee?
16 A. No.
17 Q. It would not.
18 So, who would have remained in
19 executive session, do you know?
20 A. The five audit committee members.
21 Q. Okay. And who else?
22 A. John Frazer.

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1 Q. Okay. And Mr. Frazer is the general
2 counsel for, would outside counsel have remained
3 as well?
4 A. Yes.
5 Q. And do you recall who that might
6 have been on this particular date?
7 A. Steve Hart.
8 Q. Let me ask you something. Who was
9 Steve Hart?
10 A. He was a lawyer for NRA.
11 Q. And, was he -- so as I understand
12 Mr. Frazer is the in-house counsel for NRA; is
13 that correct?
14 A. Yes.
15 Q. What was Mr. Hart's role for the
16 NRA, do you know?
17 A. He would advise on things that
18 perhaps the in-house counsel would not have
19 known.
20 They worked together.
21 Q. I see. So, did he also provide
22 advice to the board?

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1 A. Yes.
2 Q. It goes on after executive sessions,
3 it refers to a number of resolutions that are all
4 kind of identified by a Roman numeral.
5 But, it, the first Roman numeral,
6 Number 1 relates to Oliver North.
7 And it appears to be a discussion
8 about the fact that Oliver North entered into a
9 contract with Ackerman McQueen.
10 Do you remember this discussion?
11 A. Yes.
12 Q. And could you describe what you
13 recall about the discussion on September 6th of
14 2018 related to Oliver North's contract?
15 MR. COLLINS? That wasn't in the
16 executive session.
17 MR. SCHERTLER: It is executive
18 session.
19 MR. COLLINS: It is executive
20 session.
21 THE WITNESS: It was, yes.
22 MR. COLLINS: Okay. I can tell, I

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1 can let her testify generally what the
2 subject matter was.
3 But, you may not get anything more
4 than Oliver North.
5 If it was an executive session, it
6 would have been privileged. This attorney
7 was there to help provide advice, or I can
8 speak to her outside the room to make sure my
9 understanding is correct.
10 BY MR. SCHERTLER:
11 Q. I don't mind advice from an attorney
12 but not discussing advice from the attorney.
13 But, what was the discussion among
14 the board members about Lieutenant North's
15 contract?
16 MR. COLLINS: And just, my concern
17 is to the extent they are discussing it, and
18 that is providing background for the attorney
19 to give advice, that is my concern.
20 MR. SCHERTLER: So, here is your
21 problem. I mean your problem is, first of
22 all, I've got this document.

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1 And secondly that discusses what was
2 discussed.
3 MR. COLLINS: Right, so ...
4 MR. SCHERTLER: But, secondly, you
5 all are making a claim about things that were
6 known or not known about Oliver North's
7 contract at that point in time.
8 MR. COLLINS: Correct.
9 MR. SCHERTLER: And I think that you
10 can't claim, you can't hide behind the
11 privileges. You were asserting that there
12 were things that weren't told to you.
13 And I think we are entitled to get a
14 witness' knowledge as to what was told.
15 MR. COLLINS: I understand your
16 position. And, I agree since we produced
17 that document, what is discussed here that
18 may have been executive session, you can talk
19 about is outlined here.
20 If it is not outlined here, I will
21 need to think about the next step.
22 But, it is outlined here and if you

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1 can start with that that works for you.
2 MR. DICKIESON: And for the record
3 when you are saying here, you are pointing to
4 paragraphs in Exhibit 1.
5 MR. COLLINS: Yes, correct.
6 BY MR. SCHERTLER:
7 Q. Okay. Ms. Meadows, let me try to do
8 it this way.
9 Were you present on the phone for
10 the discussion about Lieutenant Colonel North's
11 contract?
12 A. In executive session or --
13 Q. Yes.
14 A. Yes.
15 Q. And do you recall the, do you recall
16 that discussion?
17 A. I recall there was a discussion.
18 Specifics, no.
19 Q. So, you don't recall the specifics
20 of the discussion.
21 Is it fair to say that this would
22 have been a record of, what we are looking at in

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1 Roman Numeral I under Oliver North would be a
2 record at least summarizing what was discussed in
3 that executive session?
4 A. Yes.
5 Q. And, do you know who would have been
6 talking about, if you recall, who was providing
7 you information about Lieutenant North's contract?
8 A. John Frazer.
9 Q. Do you know whether Steve Hart was
10 here as well?
11 A. I don't recall if he was in the
12 executive session.
13 Q. He might have been?
14 A. He might have been. There were
15 times when he would have been. I just don't
16 recall.
17 Q. Understood. So, here, he says, it
18 is, this says, "On or about May 15th of 2018,
19 Lieutenant Colonel Oliver North entered into a
20 contract with Ackerman McQueen, and they referred
21 to it as the AMC contract, which remains in force
22 at this time and in which Lieutenant Colonel

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1 North has a substantial financial interest."
2 Do you see that?
3 A. Yes.
4 Q. Is that a fair, is that a fair
5 memorialization of what you were told in this
6 executive session?
7 MR. COLLINS: Objection. Can we,
8 what she learned? Because told that gets
9 into maybe advice he gave.
10 BY MR. SCHERTLER:
11 Q. So, learned. Was this discussed,
12 was this told to you, or did you learn this in
13 executive session?
14 MR. COLLINS: You can say that yes
15 or no.
16 THE WITNESS: That was a yes.
17 BY MR. SCHERTLER:
18 Q. Okay. Now, it talks about a
19 contract.
20 Do you see that? Where it says, "He
21 entered into a contract."
22 A. Yes, the first sentence.

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1 Q. Is there any reference in that
2 paragraph to a, Lieutenant North entering into a
3 contract as an independent contractor with
4 Ackerman McQueen?
5 MR. COLLINS: Objection to the form.
6 THE WITNESS: All right.
7 BY MR. SCHERTLER:
8 Q. Is there any reference in here to
9 Lieutenant Colonel North being an independent
10 contractor?
11 A. No.
12 Q. And is there any reference to him
13 being an employee of Ackerman McQueen?
14 A. If he has a contract, I would think
15 he would be an employee.
16 Q. Okay. Thank you.
17 If I could take you to the fourth
18 paragraph where it says, "Whereas the audit
19 committee has therefore determined that it is
20 fair, reasonable, and in the best interests of
21 the NRA to approve and ratify Lieutenant Colonel
22 North's continued participation in the AMC

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1 contract during his service on the NRA board and
2 as an NRA officer."
3 Do you see that?
4 A. Yes.
5 Q. So, is that what the audit committee
6 determined at that time?
7 A. Yes.
8 Q. And did the audit committee then
9 approve Colonel North's continued participation
10 in his contract with Ackerman McQueen?
11 A. Yes.
12 Q. Even if that contract might have
13 been a contract as an employee of Ackerman
14 McQueen?
15 MR. COLLINS: Objection to the form.
16 BY MR. SCHERTLER:
17 Q. Even if that contract -- you can
18 answer that question.
19 Even if the contract meant that
20 Oliver North was an employee of Ackerman McQueen?
21 MR. COLLINS: Objection to the form.
22 But you are certainly entitled to answer if

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1 you can.
2 THE WITNESS: Yes.
3 BY MR. SCHERTLER:
4 Q. If I could take you to the second
5 page under Roman Numeral IV, it makes reference
6 to a sailing trip under Woody Phillips.
7 Do you have any recollection of what
8 the sailing trip is about?
9 A. I know what was reported.
10 Q. What was reported?
11 A. That he was meeting with high
12 donors.
13 Q. On sailboats?
14 Did this, did the board
15 retroactively approved Mr. Phillips participating
16 in this sailing trip at this meeting?
17 A. Yes.
18 Q. And if I could take you to, that is
19 the page with Josh Powell.
20 First of all, who is Josh Powell?
21 A. Josh Powell was a, an NRA board
22 member and then became an NRA employee.

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1 Q. And what was his position as an NRA
2 employee, if you know?
3 A. He, at first worked in special ops
4 and after that as chief of staff to Wayne
5 LaPierre.
6 Q. Did you know Josh Powell before he
7 joined the NRA?
8 A. No.
9 Q. Were you aware of his background at
10 all before he joined the NRA?
11 A. No.
12 Q. Have you subsequently learned things
13 about his background before joining the NRA?
14 A. Yes.
15 Q. What have you learned?
16 A. He had unusual business dealings.
17 Q. Why was, why were, do you know why
18 you didn't find that out before he joined the
19 NRA?
20 A. Careless.
21 Q. Could you explain that a little bit?
22 Just -- when you say careless?

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1 A. I don't know. I don't know why.
2 Q. Do you think it should have been
3 known?
4 A. Yes.
5 Q. Do you think the board members
6 should have been aware of his background?
7 A. I think leadership should have been.
8 Q. And do you think that that would
9 have been a relevant factor in determining
10 whether Josh Powell ever should have been hired
11 by the NRA?
12 A. Yes.
13 Q. Knowing what you know now, do you
14 think that Josh Powell should have been hired by
15 the NRA?
16 A. That would be judgment. I would not
17 answer.
18 Q. Understood. Fair answer.
19 Were you aware of, while Josh Powell
20 was with the NRA, were you aware of allegations
21 made against him for sexual harassment?
22 A. At some point.

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1 Q. At what point were you made aware of
2 this?
3 A. I don't recall. Much later, I would
4 say.
5 Q. Do you know whether any actions were
6 taken as a result of those allegations?
7 A. I do not.
8 Q. Do you know whether the NRA ever had
9 to enter into a settlement agreement for, with
10 the victims or complainants in connection with
11 those allegations?
12 MR. COLLINS: Objection to the form.
13 THE WITNESS: I do not know.
14 BY MR. SCHERTLER:
15 Q. Is Josh Powell currently employed
16 with the NRA?
17 A. Yes.
18 Q. And what is his position with the
19 NRA now?
20 A. The same.
21 Q. Same position.
22 A. Chief of staff.

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1 Q. And is he actively working as chief
2 of staff as far as you know?
3 A. No.
4 Q. So, what is he doing?
5 A. I don't know.
6 Q. But he does maintain his position
7 with chief of staff with the NRA?
8 A. He still has the title.
9 Q. As chief of staff of the NRA?
10 A. Correct.
11 Q. And is still being compensated by
12 the NRA as chief of staff?
13 A. Yes.
14 Q. So, you regard him as a current
15 employee of NRA?
16 MR. COLLINS: Objection to the form.
17 THE WITNESS: Yes.
18 BY MR. SCHERTLER:
19 Q. Just, in looking at this, it seems
20 to indicate that the NRA had purchased consulting
21 and fund-raising services from a company called
22 McKenna & Associates totaling approximately

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1 \$2.44 million.
2 And then it appears that at some
3 point after the NRA purchased that,
4 Ms. Gallagher, the wife of Josh Powell, was
5 subcontracted by McKenna as a senior advisor.
6 Did that raise a potential conflict
7 in the view of the audit committee?
8 MR. COLLINS: Objection to the form.
9 THE WITNESS: We didn't know it at
10 the time. So, no, it didn't.
11 BY MR. SCHERTLER:
12 Q. Why didn't Mr. Powell tell you about
13 that?
14 A. He didn't.
15 Q. He what?
16 A. Mr. Powell did not tell us. He
17 didn't tell the audit committee.
18 Q. I see. Did he tell anybody?
19 A. That I, I don't know.
20 Q. And then if you go to the next page,
21 there is a reference to Jim Powell Photography.
22 Jim Powell is the father of Josh

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1 Powell?
2 A. Yes.
3 Q. And it appears that Mr. Powell had
4 been engaged for services that were invoiced to
5 the NRA. And I think the amount here it is
6 approximately \$93,000.
7 Was the audit committee aware of
8 that before it occurred?
9 A. No.
10 Q. Do you know why not?
11 A. No.
12 Q. Do you think the audit committee
13 should have been aware of that before?
14 MR. COLLINS: Objection to the form.
15 THE WITNESS: No.
16 BY MR. SCHERTLER:
17 Q. It shouldn't have been?
18 A. If it had been over 100,000, yes.
19 But, no.
20 Q. If it were under 100,000 it wouldn't
21 have been required?
22 A. Right.

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1 Q. Okay. The, if I could just go back,
2 and I'm not going to refer to anything.
3 But, is it -- it is fair to say that
4 there was some discussion in the executive
5 session about Oliver North's contract with
6 Ackerman McQueen, correct?
7 A. I don't remember specifics. But,
8 yes. There would have been.
9 Q. And were you allowed to ask
10 questions about the contract, if there were
11 questions that you thought you wanted answered
12 about it?
13 A. Who would we have asked?
14 Q. Well, whoever is giving you the
15 description of the contract. Would members of
16 the audit committee have been allowed to asks
17 questions if they had additional questions?
18 A. Yes.
19 Q. And do you recall whether there were
20 questions that were asked?
21 A. I don't recall.
22 Q. Did you ask any questions?

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1 A. No.
2 Q. Did anybody say I think there is
3 additional information we need to know about this
4 before we approve it?
5 A. It would be speculating.
6 But, I would say yes.
7 Q. And then if people needed additional
8 information about it, why wasn't -- was that
9 additional information obtained before the audit
10 committee approved it?
11 A. No.
12 Q. Why not?
13 A. A good faith. I would say.
14 Q. Good faith belief?
15 A. That it was okay.
16 Q. And, would that be based on what
17 Ms., Mr. Frazer was telling you about the
18 contract?
19 A. It would be.
20 Q. Were you aware of the fact that
21 prior to this, that -- whether anybody associated
22 with the NRA, lawyer or otherwise, was able to

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1 review Lieutenant Colonel North's contract with
2 Ackerman McQueen?
3 A. No.
4 Q. And does that mean you don't know?
5 Or --
6 A. It means they did, that I believe
7 they did not review the contract.
8 Q. Do you know, do you have any
9 information of whether Woody Phillips had
10 actually reviewed the contract back in --
11 A. I do not.
12 Q. Do you know whether or not Steve
13 Hart had reviewed the contract before?
14 A. I do not.
15 Q. Was there any request at this
16 meeting by anybody on the audit committee to
17 actually see the contract before we approve it?
18 A. It was discussed.
19 Q. And what was the decision made?
20 A. That they didn't have it but still
21 approved.
22 Q. Okay. Was there anything to prevent

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1 the board, or the audit committee from saying
2 look we are not going to approve this until we
3 actually see it?
4 MR. COLLINS: Objection to the form.
5 THE WITNESS: I didn't answer. Ask
6 it again.
7 BY MR. SCHERTLER:
8 Q. Was there anything to prevent the
9 audit committee at this meeting from saying we
10 are not going to approve Mr. North's contract
11 until we actually see it?
12 A. It could have happened, yes.
13 Q. Okay. But it didn't?
14 A. It did not.
15 Q. But it was something the audit
16 committee could have requested --
17 A. Yes.
18 Q. -- if they felt it was necessary?
19 A. Yes.
20 Q. So, I apologize because I think you
21 might have answered this for me already.
22 Were you familiar with Lieutenant

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1 Colonel North before he became president of the
2 NRA?
3 A. Yes.
4 Q. And what was your relationship with
5 him prior to him becoming president?
6 A. I contributed \$1,000 to his Senate
7 race.
8 Q. That he lost?
9 A. That he lost. Yes. My knowledge
10 and appointments with him that was '94. So it
11 goes back that far.
12 Q. What was your impression of him?
13 A. It was good.
14 Q. Does that impression remain today?
15 MR. COLLINS: Objection to the form.
16 But go ahead, please.
17 THE WITNESS: His service in the
18 defense of our country, yes. But dealings
19 with NRA, no.
20 BY MR. SCHERTLER:
21 Q. Okay. And do you recall when he
22 actually became or was voted as president of the

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1 NRA?
2 A. Yes.
3 Q. When was that?
4 A. In September of '18.
5 Q. And would that have been at the
6 NRA's annual meeting?
7 A. Yes.
8 Q. Do you recall where that meeting was
9 located?
10 A. That meeting would have been, where
11 the heck was it -- no --
12 Q. That is okay.
13 A. Yeah, I, you know, I rely on minutes
14 and the handbook.
15 If I had my handbook here, I could
16 sure help you. Too many meetings.
17 Q. Your handbook? Do you have a
18 handbook that -- what handbook are you referring
19 to?
20 A. It lists the board of directors by
21 name, their pictures, committees they serve on.
22 Q. I see. So, this is actually a

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1 handbook produced by the NRA that you get to show
2 who is --
3 A. For only directors.
4 Q. Only directors, okay.
5 When Lieutenant Colonel North became
6 president you were then serving as the second
7 vice president to him. Correct?
8 A. Actually, no.
9 Q. Could you clarify then for me?
10 A. I was interim president.
11 Q. You were interim president between
12 Mr. Brownell and Lieutenant Colonel North?
13 A. Yes.
14 Q. Then when Lieutenant Colonel North
15 was selected president, did you go back to your
16 original position as second vice president?
17 A. Yes.
18 Q. And, Mr. Childress was first vice
19 president, correct?
20 A. Correct.
21 Q. So, what kind of relationship did
22 the three of you have in terms of your, the work

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1 that you were performing for the NRA as the
2 officers?
3 A. Professional. And good.
4 Q. Did you meet on a regular basis?
5 A. No.
6 Q. Did you have regular discussions?
7 A. By phone, yes.
8 Q. And, in those phone discussions,
9 what kinds of things would the three of you
10 discuss related to NRA work?
11 A. Plans for upcoming meetings.
12 Perhaps speakers.
13 Q. What I would like to do is show you
14 what we have marked as Exhibit 17. I'm sorry,
15 going out of order a little bit here.
16 (Meadows Exhibit Number 17
17 marked for identification.)
18 MR. SCHERTLER: And, you know what
19 I'll do, I guess I'm going to place these
20 right in the middle here. And we have
21 copies, Mike, we have copies for you. And
22 even Bob.

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1 And again why don't you take a
2 minute to go through this. We will go off
3 the record.
4 (Recess taken -- 12:01 p.m.)
5 (After recess -- 12:03 p.m.)
6 THE WITNESS: Okay.
7 BY MR. SCHERTLER:
8 Q. So, first of all, do you recognize
9 this document?
10 A. Yes.
11 Q. What is it?
12 A. It was the agenda for the meeting of
13 the officers.
14 Q. Is this kind of a regular meeting
15 that the officers had?
16 A. It would be regular and there would
17 be three a year at the board meetings.
18 Q. And it seems, do you know who
19 prepared this agenda?
20 A. I do not.
21 Q. It is dated October, it says Agenda
22 for 24 October 2018.

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1 Do you recall having an officers'
2 meeting on that date or around that date?
3 A. Yes.
4 Q. And where would that have been?
5 A. Headquarters.
6 Q. Here in Fairfax? NRA headquarters?
7 A. Yes.
8 Q. It says, "NRA presidential advisors,
9 a/k/a kitchen cabinet."
10 Had you heard that term kitchen
11 cabinet before?
12 A. I do not remember that ever being on
13 our agenda.
14 Q. Kitchen cabinet?
15 A. Yes. I'm not saying it was not
16 there. I do not remember that.
17 Q. It says underneath Objective,
18 "Provide advice and recommendations to the
19 president and executive vice president on matters
20 crucial to the good governance of the
21 association."
22 Do you, was that the purpose of

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1 these meetings?
2 A. Not generally.
3 Q. So, generally what was the purpose?
4 A. Fact sharing.
5 Q. Now it does indicate that you, at
6 least in the agenda, that you were responsible
7 for leading the pledge of allegiance, does that
8 sound accurate?
9 A. That did not happen.
10 Q. There was no pledge of allegiance?
11 A. No.
12 Q. It describes a gentleman named Nick
13 Perrine as doing a roll call.
14 First of all, can you tell me who
15 Nick Perrine is?
16 A. He is an aide to the president and
17 first and second vice president.
18 Q. So, an aide to the officers that
19 would include you, Mr. Childress and Lieutenant
20 Colonel North?
21 A. Yes, primarily the president.
22 Q. And, it then talks about an

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1 introduction by Oliver North.
2 Do you recall that?
3 A. Not in particular.
4 Q. It then talks about a financial
5 report by Wayne LaPierre.
6 Do you recall Mr. LaPierre being at
7 the meeting?
8 A. Yes.
9 Q. It makes a reference under Financial
10 Report to "best means of emergency funding."
11 Do you recall what the issue was
12 with respect to emergency funding?
13 A. No.
14 Q. And when it says WP, OLN, CC, I
15 believe -- I am interpreting WP to be Wayne
16 LaPierre, OLN to be Lieutenant Colonel North.
17 Who would CC be?
18 A. I don't know.
19 Q. Okay.
20 A. I am trying to think.
21 Q. Was there an issue with the NRA at
22 that time that regarded, that involved a need for

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1 emergency funding?
2 A. No, not that I'm aware of.
3 Q. Okay. And --
4 A. If I could say this, this would have
5 been prepared by Colonel North.
6 He always prepared his own agendas.
7 They were always in capital letters.
8 Q. I have noticed the capital letters.
9 A. Yes.
10 Q. Thank you. Let me just go down. It
11 talks about, if I could take you to Number 8 on
12 the first page, it makes a reference to the
13 Lockton case and then it has OLN and Steve Hart.
14 And I believe again that would be
15 Oliver North? OLN?
16 A. Yes.
17 Q. What was the Lockton case?
18 A. They handled vendors. Lots of
19 vendors that NRA employed.
20 Q. And was there a lawsuit related to
21 Lockton?
22 A. Yes.

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1 Q. Were you familiar with the issues in
2 that lawsuit?
3 A. Very little.
4 Q. Okay. Do you know how the lawsuit
5 eventually ended?
6 A. It has not ended.
7 Q. It is still going?
8 A. Yes.
9 Q. You don't know whether that -- that
10 that settled or not?
11 A. I know that it is not settled.
12 Q. Okay. And do you know who
13 represents the NRA in that lawsuit?
14 A. Brewer.
15 Q. And Brewer would be William Brewer?
16 A. Correct.
17 Q. And his law firm. And we will just,
18 if it is okay with you just make reference to it
19 as the Brewer law firm?
20 A. Correct.
21 Q. If I could take you to the second
22 page, Number 10 talks about other pressing

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1 issues.
2 And it includes, right after that,
3 the role of Bill Brewer and JP.
4 Do you know who JP is?
5 A. I don't.
6 Q. Going forward Russia, going forward
7 Russia issues?
8 A. I would assume this was Josh Powell.
9 Q. I see.
10 A. I don't know that.
11 Q. Do you know what the reference is to
12 Russia issues?
13 A. No.
14 Q. Do you know whether there was an
15 investigation that involved the NRA regarding a
16 trip taken by a number of NRA members to Russia?
17 MR. COLLINS: Objection to the form.
18 But if you know.
19 THE WITNESS: Investigation by whom?
20 BY MR. SCHERTLER:
21 Q. The Department of Justice.
22 A. I know that it is an issue. I'm not

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1 aware that it is Justice.
2 Q. Okay. Number 11 says, "Questions
3 asked by board of director members and donors."
4 Do you see that?
5 A. Yes.
6 Q. And then right under that it says,
7 "How did Bill Brewer come to be picked?"
8 Do you recall that that question had
9 been asked by Board of Directors members or
10 donors? Questions about how Bill Brewer came to
11 be picked?
12 MR. COLLINS: Objection to the form.
13 THE WITNESS: The only person I knew
14 that questioned it was Ollie North.
15 BY MR. SCHERTLER:
16 Q. Questioned Bill Brewer?
17 A. Correct.
18 Q. And how he came to be picked?
19 A. Yes.
20 Q. How did Bill Brewer come to be
21 picked, do you know?
22 A. Yes.

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1 Q. How did he come to be picked?
2 A. He was chosen by Wayne LaPierre at
3 the recommendation of Steve Hart.
4 Q. And when it says, "Did he reveal
5 relationship to Angus McQueen?" What
6 relationship did Bill Brewer have to Angus
7 McQueen?
8 A. Father-in-law.
9 Q. It then goes down to say, "Did he
10 disclose his ethical problems in Texas?"
11 Do you have any information about
12 Mr. Brewer's ethical problems in Texas?
13 MR. COLLINS: Objection to the form.
14 THE WITNESS: Only what was in the
15 New York Times.
16 BY MR. SCHERTLER:
17 Q. Beware of what you read in the
18 papers.
19 Then it makes a reference, "where
20 did Josh come from? "
21 Do you see that?
22 A. Yes.

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1 Q. What was that discussion about?
2 A. I don't recall. I -- I don't
3 recall.
4 Q. Understood. Could I take you to the
5 third page. It then says, "Who vetted Josh? Do
6 we have to keep him?"
7 What do you recall about that, if
8 anything?
9 MR. COLLINS: Objection to the form.
10 THE WITNESS: I recall discussions,
11 not the two specific questions.
12 BY MR. SCHERTLER:
13 Q. What was the discussion?
14 A. Generally about Josh Powell.
15 Q. Were there concerns at that time
16 about Josh Powell?
17 MR. COLLINS: Objection to form.
18 THE WITNESS: By Colonel North, yes.
19 BY MR. SCHERTLER:
20 Q. And do you know what those concerns
21 were?
22 A. He didn't like him.

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1 Q. Did you know why? Did he express a
2 reason as to why he didn't like him?
3 A. No.
4 Q. But you later learned things about
5 Josh Powell that had not been discovered when
6 Josh Powell was hired by the NRA, correct?
7 MR. COLLINS: Objection to the form.
8 THE WITNESS: I did not personally
9 have contact with him.
10 It would have been through NRA
11 counsel.
12 BY MR. SCHERTLER:
13 Q. I see. Finally it talks about, it
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]

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█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]

6 Do you recall what the discussion
7 was about whistle blower accusations?
8 A. I don't believe it was discussed at
9 that meeting.
10 The meeting got long. The issues on
11 this page. And I don't think those were
12 discussed.
13 Q. Okay.
14 A. That is my recollection.
15 Q. Did you think these meetings were
16 productive?
17 MR. COLLINS: Objection to the form.
18 This meeting or just generally these meetings?
19 BY MR. SCHERTLER:
20 Q. Well let's say this meeting.
21 A. Not really, no.
22 Q. Why not?

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1 A. It was disjointed. There were
2 accusations. I didn't think it was a good
3 meeting.
4 Q. Generally were they not good
5 meetings?
6 A. Generally they were good meetings.
7 Q. I see. But not this particular one?
8 A. Correct.
9 Q. Let me take you to the next exhibit,
10 it is a shorter one.
11 A. Okay.
12 Q. Okay. So ...
13 MR. SCHERTLER: You can just hand
14 those to Ms. Meadows. 18.
15 (Meadows Exhibit Number 18
16 marked for identification.)
17 THE WITNESS: I have read it.
18 BY MR. SCHERTLER:
19 Q. So, Ms. Meadows, if, and forgive me
20 for this because I don't want to misstate
21 anything that you might have said before.
22 But I think you indicated that when

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1 we looked at that agenda for October 24th which
2 is some months before this February memo, that
3 Lieutenant Colonel North raised some questions
4 about Bill Brewer.
5 Is that fair to say?
6 A. Yes.
7 Q. So, even at that time in October of
8 2018 Lieutenant Colonel North had concerns about
9 Mr. Brewer?
10 A. Yes.
11 Q. Can you tell us at that point, in
12 let's say back in the fall of 2018 when you had
13 that meeting, what were Lieutenant Colonel
14 North's concerns about Mr. Brewer?
15 A. In the October meeting I don't know.
16 But, leading up to this, it strictly had to do
17 with the amount of money.
18 Q. Can you tell us what was it about
19 the amount of money that caused concern to
20 Lieutenant Colonel North?
21 A. You would have to ask him.
22 Q. But, did he express to you that he

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1 was concerned about the amount of money that was
2 being paid to the Brewer law firm?
3 A. Yes.
4 Q. Did he think that that amount of
5 money was excessive?
6 A. He did say that, yes.
7 Q. And, did he have concerns as to what
8 work was being done for that amount of money?
9 A. I don't -- that -- you would have to
10 ask him. I don't know.
11 Q. So, he never went into a more
12 detailed discussion about exactly what did
13 concern him?
14 A. It, basically it was money.
15 Q. So, this, if we look at this
16 exhibit, it appears to be a letter addressed to
17 Mr. LaPierre. And it is dated, the signatures
18 are dated February 26, 2019.
19 It reads, "The elected non-salaried
20 officers have met and determined that we have
21 fiduciary obligations that need to be urgently
22 addressed with you and, if you wish, with

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1 Mr. Brewer.
2 "We have determined that the
3 retainer agreement dated 7 March 2018 with Brewer
4 Attorneys and Counselors is not properly executed
5 and is not, therefore, valid."
6 It then goes on to, at the end, "In
7 order to comply with our own rules and nonprofit
8 law in New York, we insist that no invoices
9 payable to Brewer Attorneys and Counselors be
10 paid for services rendered after 28 February,
11 2019."
12 It is then, it appears to be signed
13 by Lieutenant Colonel North, Mr. Childress and
14 you.
15 Did you sign this document?
16 A. Actually, yes.
17 Q. Okay. And can you tell us why you
18 signed it?
19 A. I wish I could. No, strike that.
20 It, I, I agreed that more information
21 should be forthcoming.
22 Later I would not have signed this.

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1 Q. But, at this time you did believe
2 that more information, presumably about the
3 Brewer law firm fees, should be forthcoming to
4 the officers?
5 A. Yes.
6 Q. Did you feel that as part of the,
7 member of the audit committee, that the audit
8 committee should also be aware of the fees that
9 were being charged by the Brewer law firm?
10 A. Yes.
11 Q. And was the audit committee given
12 information about the fees being charged by the
13 Brewer law firm?
14 A. When?
15 Q. At this time.
16 A. Not to my knowledge.
17 Q. For instance were invoices from the
18 Brewer law firm ever shared with the officers,
19 yourself, Mr. Childress or Lieutenant Colonel
20 North?
21 A. No.
22 Q. Why not?

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1 A. That is not our job.
2 Q. What harm would it be to have you be
3 able to, for the president, the vice president
4 and the second vice president to be able to look
5 at the invoices and see what they said?
6 MR. COLLINS: Objection to the form.
7 THE WITNESS: I don't know that
8 they -- I don't know that there would have
9 been harm.
10 Where it says unpaid people, we meet
11 irregularly. That is not part of what we do.
12 We have good people who look at that
13 and advise.
14 BY MR. SCHERTLER:
15 Q. But you are officers of the NRA,
16 correct?
17 A. Correct.
18 Q. And as officers of the NRA, do you
19 agree that you have fiduciary duties to make sure
20 that the NRA is, for lack of a better term, doing
21 the right thing?
22 MR. COLLINS: Objection to the form.

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1 THE WITNESS: Absolutely.
2 BY MR. SCHERTLER:
3 Q. And if there were a concern on the
4 part of any officer as to any issue, including
5 legal fees being charged by an outside law firm,
6 wouldn't it be a fiduciary duty of that officer
7 to say I would like to get more information about
8 this?
9 A. Yes. I did. And I was given the
10 information. Ollie North could have gotten the
11 same thing. So could Richard Childress.
12 Q. What information were you given?
13 A. As to how much was paid, how many
14 employees worked for the Brewer firm. That type
15 information.
16 Cases that they had.
17 Q. Were you ever able to see their
18 invoices?
19 A. No. But --
20 I did not lay eyes on them, but I
21 was told what they were.
22 Q. Okay.

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1 A. And I trusted that.
2 Q. Okay. So you were satisfied with
3 that?
4 A. Yes.
5 Q. But you did sign this letter?
6 A. I did.
7 Q. Okay. And at the time you signed
8 it, you agreed with what it said?
9 A. I was willing to sign it to get the
10 information that was requested.
11 Q. I see. Did you ever have a
12 discussion with Mr. LaPierre about it after you
13 signed it?
14 A. Yes.
15 Q. I would assume he got the letter.
16 And what was that conversation?
17 A. In regard to whether or not the
18 information was forthcoming. Whether or not he
19 was still satisfied with the Brewer firm.
20 Q. So, he, and, did he tell you he was
21 satisfied with the Brewer firm?
22 A. Yes.

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1 Q. Did he, was he willing to provide
2 Lieutenant Colonel North with the information
3 that Lieutenant Colonel North was asking for?
4 MR. COLLINS: Objection to the form.
5 THE WITNESS: Well, that would be
6 speculation.
7 But, knowing Wayne LaPierre,
8 absolutely.
9 BY MR. SCHERTLER:
10 Q. Okay. And do you know whether Wayne
11 LaPierre ever provided Lieutenant Colonel North
12 with the invoices that --
13 A. I don't know.
14 Q. You don't know.
15 A. Uh-uh.
16 Q. So you don't know whether Lieutenant
17 Colonel North asked for information from Wayne
18 LaPierre about the Brewer invoices and whether he
19 received that information?
20 A. I do not.
21 Q. Okay. So, let me ask you to look at
22 Exhibit 3. I'm sorry, Exhibit 2.

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1 (Meadows Exhibit Number 2
2 marked for identification.)
3 MR. COLLINS: And David, I'm just
4 noting for the record that there seem to be
5 documents that are maybe not from the same
6 production and one is not Bates stamped.
7 But, that is just for the record.
8 MR. SCHERTLER: What is that?
9 MR. COLLINS: If you look at the
10 documents, I don't think it is all one
11 document. There is no Bates number on the
12 first. And then it ends at the Oliver North
13 document Bates number. Just noted.
14 MR. SCHERTLER: Understood.
15 BY MR. SCHERTLER:
16 Q. So, may I ask you a few questions
17 about this?
18 A. Sure.
19 Q. The first page appears to be an
20 e-mail that, on March 22nd, 2019, that Lieutenant
21 Colonel North sent to John Frazer.
22 It says subject Confidential

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1 Documents and then it seems to have two
2 attachments.
3 One entitled Letter to Brewer
4 March 22nd, '19 and then Memo to the Audit
5 Committee.
6 And I believe those are the
7 attachments that have been included.
8 But, he, in the e-mail, Mr. North
9 says, "John, please find attached two
10 confidential documents from the NRA board's three
11 elected officers from urgent transmission to the
12 NRA audit committee and Brewer Attorneys and
13 Counselors."
14 And then he describes both as being
15 confidential.
16 If you look at the first of these
17 attached documents, it does appear to be a
18 March 22nd, 2019 letter to William Brewer.
19 And it does seem to be signed by
20 Lieutenant Colonel North, Mr. Childress and
21 yourself.
22 Let me first ask you, did you sign

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1 this letter?
2 A. No. It was electronically signed.
3 Q. Did you approve having your name
4 assigned to this letter?
5 A. On the day, March 22nd, yes.
6 Q. Okay.
7 A. But I later rescinded it.
8 Q. Understood. But on March 22nd you
9 did give approval to Lieutenant Colonel North to
10 sign your name to this letter on that Friday,
11 March 22nd?
12 MR. COLLINS: Objection to the form.
13 THE WITNESS: I had a telephone --
14 he called me. I was in rural Alabama on the
15 way to my granddaughter's wedding. We were
16 cut off three times.
17 I could not understand. I didn't,
18 based on what he said to me, I said he could
19 use the electronic signature. By the
20 following Monday when I had it read to me, I
21 talked to John Frazer and asked that my
22 signature be removed and it was done.

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1 BY MR. SCHERTLER:
2 Q. Okay. So, based on the information
3 that you had on Friday, you did give him approval
4 to put your name on this?
5 A. Yes.
6 Q. He didn't do it without your
7 approval?
8 A. Yes.
9 Q. And, as you read the letter, it is
10 addressed to Mr. Brewer, correct?
11 A. Correct.
12 Q. And then it seems to be asking first
13 that Mr. Brewer give, provide the NRA with
14 separate engagement letters for each matter that
15 Mr. Brewer is handling for the NRA.
16 Do you see that?
17 A. Yes.
18 Q. And then it describes, I think, A
19 through F, at a minimum what these separate
20 engagement letters and budgets should cover.
21 Do you see that?
22 A. Yes.

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1 Q. Do you see any problem with
2 requesting that kind of information from
3 Mr. Brewer?
4 A. Yes.
5 Q. Why?
6 A. We have legal people in-house,
7 treasurers, people who are employees that EVP,
8 and that would be their job to do this.
9 Q. But, if the president of the NRA
10 felt that he had a fiduciary duty to look into
11 this, for whatever reason, whether it is, you
12 know, ultimately turns out to be wrong or right,
13 why wouldn't he have the authority, if not the
14 obligation, to ask for this information for
15 himself and make sure it looked okay to him?
16 MR. COLLINS: Objection to the form.
17 THE WITNESS: He could ask for it.
18 I do not feel that copies of volumes of
19 invoices should be copied for his pleasure.
20 BY MR. SCHERTLER:
21 Q. Why not?
22 A. Why should it be? He could have

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1 gone there and looked at them.
2 Q. So, so, if --
3 So, if he were willing to go and
4 look at them, that would have been okay?
5 A. Sure.
6 MR. COLLINS: Objection. I
7 apologize, I didn't mean to cut you off, and
8 I didn't mean -- I was just trying to -- let
9 him finish and then give me a little time,
10 okay? I apologize.
11 BY MR. SCHERTLER:
12 Q. So, if I understand you correctly,
13 you are saying if he is willing to go and look at
14 the invoices or the engagement letters, they
15 should have made those available to Lieutenant
16 Colonel North, correct?
17 MR. COLLINS: Objection to the form.
18 THE WITNESS: If he requested them,
19 in my opinion he, they would have been shown
20 to him.
21 BY MR. SCHERTLER:
22 Q. Okay. So, he is requesting it.

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1 And, so, if he is requesting it, you think that
2 it should have been shown to him.
3 But, fair to say that if he
4 requested it, you think that they should have
5 shown it to him?
6 MR. COLLINS: Objection to the form.
7 THE WITNESS: In my opinion, if he
8 requested it, he was willing to go to
9 headquarters, it would have been shown to him.
10 BY MR. SCHERTLER:
11 Q. Okay. And so, just a little bit
12 differently, then, I know you think that if he
13 had requested it that the leadership would have
14 shown it to him.
15 But, do you believe that if he
16 requested it, the NRA should have shown it to
17 him?
18 MR. COLLINS: Objection to the form.
19 THE WITNESS: Yes.
20 BY MR. SCHERTLER:
21 Q. Okay. The second attachment, it
22 appears to be a memo from the, from, again,

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1 yourself, Mr. Childress and Lieutenant Colonel
2 North, to the NRA Audit Committee.
3 And, I won't read the entire memo.
4 But, if you go to the third paragraph it says,
5 "Therefore, in accordance with our fiduciary
6 duties, we are requesting that the audit
7 committee initiate an outside independent review
8 of Brewer Attorneys and Counselors fees and
9 expenses that the firm has billed the NRA."
10 Were you aware of that Lieutenant
11 Colonel North was asking for an outside
12 independent review of Mr. Brewer's invoices and
13 work?
14 A. Yes.
15 Q. And, did you see anything wrong with
16 that?
17 A. Yes.
18 Q. What was wrong with that?
19 A. We already had outside auditors; it
20 was redundant.
21 Q. Who was doing the outside audit of
22 Mr. Brewer?

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1 MR. COLLINS: Objection to the form.
2 THE WITNESS: What is that firm,
3 they are no longer with us. But we already
4 had a firm.
5 BY MR. SCHERTLER:
6 Q. But, at the same time you signed,
7 you approved --
8 A. I did not.
9 MR. COLLINS: Let him finish.
10 BY MR. SCHERTLER:
11 Q. I apologize. You approved your
12 signature on this March 22nd memo?
13 A. No.
14 Q. So, this was signed without your
15 approval?
16 A. Correct.
17 Q. Why did you have to rescind your
18 approval?
19 A. Because --
20 MR. COLLINS: Objection to the form.
21 THE WITNESS: I didn't agree with
22 it. Also it was misrepresented to me.

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1 BY MR. SCHERTLER:
2 Q. At the time you gave your approval?
3 A. Correct.
4 MR. COLLINS: Whenever is good for
5 you.
6 MR. SCHERTLER: What time is it,
7 Mike.
8 MR. COLLINS: It is 12:36 according
9 to my phone.
10 MR. SCHERTLER: This is a good time.
11 (Recess taken -- 12:36 p.m.)
12 (After recess -- 1:38 p.m.)
13 BY MR. SCHERTLER:
14 Q. Ms. Meadows, thank you. Just a
15 couple quick follow-up questions on what we were
16 discussing.
17 We had been looking at, I think that
18 March 22nd e-mail from Lieutenant Colonel North
19 to John Frazer and the attachments.
20 A. Yes.
21 Q. And I understand that you said that
22 in March, that Monday or March 25th you indicated

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1 you had rescinded your signature from those, that
2 letter to Mr. Brewer and then the letter, the
3 memo to the audit committee; is that correct?
4 A. It may not have been the Monday, it
5 was the week of that Monday. And I did say
6 Monday. But, I would say that week.
7 Q. And I just want to be clear, you
8 said, I think you used the word misrepresentation.
9 Did you believe that Lieutenant
10 Colonel North misrepresented certain things to
11 you when you discussed on Friday, or is it just
12 that you didn't understand everything that he was
13 saying?
14 A. It could have been either. I don't
15 think he intentionally did. But, I just did not
16 agree with it. The content.
17 Q. Once you later realized what the
18 content was?
19 A. Yes.
20 Q. And between the time that you had
21 spoken to Lieutenant Colonel North about it, I
22 know you were in rural Alabama; is that right?

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1 A. Lake Martin. It is rural.
2 Q. At the time you rescinded it the
3 following week, did you talk to Mr. LaPierre
4 about this?
5 A. I don't recall. Probably I would
6 have.
7 Q. And do you recall whether he had any
8 thoughts or opinions on this?
9 A. Yes, he did have an opinion.
10 Q. What was his opinion?
11 A. He would have not preferred my
12 signature on there.
13 Q. Why not?
14 A. He didn't agree with it.
15 Q. Did he ask you to rescind your
16 signature or take it off?
17 A. Absolutely not, no.
18 Q. But he did express the opinion that
19 he preferred that you not, that you would not
20 have signed it?
21 A. No.
22 Q. Well, how do you know that that was

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1 his opinion?
2 A. Because he thanked me for it. But
3 he didn't say you should or I agree.
4 Q. Understood. Let me go to Exhibit
5 Number 4.
6 (Meadows Exhibit Number 4
7 marked for identification.)
8 BY MR. SCHERTLER:
9 Q. And again, would you just take a
10 moment. This is just really one page. But,
11 please look through it.
12 A. So, that is April. April 15th.
13 Q. Yes, ma'am. This is April 15th,
14 2019.
15 A. Okay.
16 Q. E-mail involving Mr. Arulanandam
17 today.
18 A. Yes. Okay.
19 Q. So, as you can see, this is an
20 e-mail chain?
21 A. Yes.
22 Q. Dated April 15th of 2019.

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1 And, if I could take you to, you
2 know, so when we look at e-mails, I guess we have
3 to go to the bottom and then work our way up.
4 So, the first e-mail at the bottom
5 is from Danny Hakim. Do you know Danny Hakim?
6 A. I do by name only.
7 Q. Have you ever spoken to him?
8 A. No.
9 Q. And you know him as a reporter with
10 the New York Times?
11 A. Yes.
12 Q. The, Mr. Hakim says to Andrew
13 Arulanandam, "Two specific questions I have.
14 Given what's in the suit, what is the status of
15 Oliver North?
16 "Is his presidency of the
17 organization under any kind of review."
18 Could I ask you, do you know what he
19 is referring to when he says given what is in the
20 suit?
21 A. I do not.
22 Q. Were you aware of the fact that on

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1 April 12th of 2019, last year, the NRA filed the
2 first lawsuit against Ackerman McQueen here in
3 the Virginia Circuit Court?
4 A. I don't recall the April 12th date.
5 But, I did know a lawsuit was filed.
6 Q. Did you know that the lawsuit was
7 going to be filed before it was filed?
8 A. I don't recall.
9 Q. So, do you recall --
10 A. Probably. I just don't recall. I
11 would think so.
12 Q. Okay. And do you have any
13 recollection of how you might have learned about
14 that first lawsuit?
15 A. It would have been through, from
16 John Frazer.
17 Q. Okay. If you go up to the top, then
18 Mr. Arulanandam, responds to Mr. Hakim saying,
19 "Andy, I understand you are on a deadline.
20 "Below is a quote from our second
21 vice president, Carolyn Meadows, that we hope you
22 will find helpful for your story."

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1 And then it includes what appears to
2 be a quote from you. Do you see that?
3 A. Yes.
4 Q. So, did you approve this quote?
5 A. I did.
6 Q. And did you write this quote?
7 A. No.
8 Q. Who wrote it?
9 A. Andrew.
10 Q. And how did he come to solicit a
11 quote from you? Do you recall?
12 A. He didn't say, I didn't ask.
13 Q. And how would that have worked.
14 Would he have just presented you
15 with a draft and said would you be okay if this
16 quote was used in the New York Times?
17 A. Yes.
18 Q. Is it common for other NRA employees
19 to prepare quotes and then ask you to review it
20 for attribution to you?
21 A. (No audible response.)
22 Q. Do you typically, do you ever

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1 prepare your own quotes to the press?
2 A. No.
3 Q. Is that, is it a typical process for
4 someone else to prepare the quote and then have
5 you review it and approve it?
6 A. Yes. It would not be someone. It
7 would actually always, it has always been Andrew.
8 Q. Okay. So, Andrew Arulanandam would
9 be the person who would be asking, asking you to
10 review a quote that is intended to go to the
11 press?
12 A. Yes.
13 Q. How often does that happen?
14 A. Infrequently.
15 Q. And do you ever talk directly to the
16 press?
17 A. No. I have. No, not regularly.
18 Q. Do you know why you were asked to
19 make this particular comment?
20 A. Not exactly the wording. I don't
21 recall, because it is not specific to what is
22 printed below.

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1 But it was meant to let his readers
2 know that the board does have access to any full
3 disclosure.
4 Q. He also says you were a full
5 throated supporter of Wayne LaPierre's
6 leadership.
7 Is that true?
8 A. Yes.
9 Q. Does that continue to be true today?
10 A. Absolutely.
11 Q. Why are you a full throated
12 supporter for Wayne LaPierre's leadership?
13 A. Having known him for 25 years, his
14 track record, has never wavered from his mission,
15 which is my mission I support.
16 Q. What is the role of the executive
17 vice president of the NRA?
18 A. That of the CEO, run the company.
19 Q. So, he basically makes all of the
20 decisions?
21 MR. COLLINS: Objection to the form.
22 BY MR. SCHERTLER:

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1 Q. I mean that is a bad way to phrase
2 it.
3 So, he has, when you say CEO he runs
4 the company.
5 So, in the case of the NRA,
6 Mr. LaPierre would essentially be what a CEO is
7 typically to a corporation?
8 A. I would say so.
9 Q. And does he run the day-to-day
10 operations of the NRA?
11 A. Not all. He has division heads who
12 do. And, any, anything big would seek his
13 approval.
14 Q. Do those division heads report to
15 Mr. LaPierre?
16 A. Yes.
17 Q. And, what is the authority and power
18 of Mr. LaPierre compared to the president? Can
19 you describe that for us?
20 A. I can't think of an appropriate
21 description. It is a working relationship. We
22 frequently talk. Things that are coming up that

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1 perhaps would affect a decision I would make, he
2 is very good at communicating.
3 Q. Do you, as the president, have the
4 same authority as Mr. LaPierre?
5 A. Absolutely no.
6 Q. And, can you describe -- can you
7 explain that a little more?
8 A. Well it was never, the NRA was never
9 intended to operate that way.
10 I am an unpaid volunteer. And, I am
11 infrequently at headquarters. So it just
12 wouldn't work.
13 You have to have a leader who takes
14 care of day-to-day operations.
15 Q. And in this case that is
16 Mr. LaPierre?
17 A. Yes.
18 Q. And, Mr. LaPierre is a compensated
19 employee; is that correct?
20 A. Correct.
21 Q. Do you know what his annual
22 compensation is right now with the NRA?

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1 A. Not exactly. I am privy to it. I
2 approve it.
3 Q. But, as you sit here today, you
4 can't recall exactly what the amount is?
5 A. I cannot.
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 Q. Let me show you Exhibit 5.
14 And --
15 A. Are we --
16 Q. Yes, we are done with that one,
17 thank you.
18 (Meadows Exhibit Number 5
19 marked for identification.)
20 MR. SCHERTLER: Mike, I am using an
21 unredacted version because we don't believe
22 that this is -- I think there were redactions

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1 that we disagreed with.
2 But, for purposes of the record, I
3 will acknowledge that I believe you have
4 taken the position that certain portions of
5 this are privileged and need to be redacted.
6 And, once we sort that out, we will,
7 whatever is decided by us, by agreement or by
8 the court, we will abide by.
9 MR. COLLINS: And you agree that by
10 me allowing you to use it now for this
11 deposition I'm not waiving any privileges.
12 MR. SCHERTLER: Yes, yes.
13 MR. COLLINS: Okay, perfect. That
14 is fine.
15 MR. SCHERTLER: As your firm seems
16 to say, we preserve all rights and waive
17 none. I am going to use that, Michael.
18 MR. COLLINS: You are welcome to.
19 BY MR. SCHERTLER:
20 Q. I know this is lengthy. Before I
21 waste your time spending a lot of time reviewing,
22 are you familiar with this letter?

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1 A. Yes.
2 Q. Okay. So have you seen it before?
3 A. I don't think I saw all of it
4 flipping through here.
5 Q. And just for the record, it appears
6 to be a letter dated April 18th, 2019, to John
7 Frazer and Charles Cotton.
8 A. Correct.
9 Q. And then it is signed by, in this
10 case, by Mr. North and Mr. Childress.
11 Could I ask you a quick question
12 about Richard Childress?
13 At some point before this I think
14 you had indicated that you had rescinded your
15 signature from some of the letters dealing with
16 the Brewer law firm.
17 It -- what --
18 Did you have any knowledge of what
19 Mr. Childress's view of the invoices of Brewer
20 law firm was?
21 A. Yes.
22 Q. What was his view?

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1 A. He agreed with Colonel North. I did
2 hear him say that.
3 Q. Okay. What, what is the background
4 of Mr. Childress?
5 A. He was a Nascar driver in the '70s.
6 He owns a racing team.
7 He has a very large business that
8 manufactures race car parts and he owns a venue.
9 Q. Had he been a long time board
10 member?
11 A. No.
12 Q. Was he a member of the board at all?
13 A. Yes.
14 Q. And at this point in time he had
15 been elected first vice president?
16 A. Yes.
17 Q. Does he still serve in that
18 capacity?
19 A. No.
20 Q. Was he removed from?
21 A. No.
22 Q. Did he resign from that position?

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1 A. Yes.
2 Q. Did he also resign from the board?
3 A. Yes.
4 Q. What is your personal relationship
5 with him if any?
6 A. Quite good.
7 Q. And professional --
8 A. I like race cars.
9 Q. Could I just point out a couple of
10 things in this letter to you and ask you a few
11 questions about it.
12 A. Sure.
13 Q. The first paragraph says, "As
14 indicated in previous correspondence, we and
15 others continue to be deeply concerned about the
16 extraordinary legal fees the NRA has incurred
17 with Brewer Attorneys and Counselors.
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]

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1 13 months that is approximately a little bit over
2 one year?
3 Did you view [REDACTED]
4 [REDACTED] to be a
5 substantial amount of money?
6 A. The question is not correct.
7 Q. I'm sorry, please, did I -- if I
8 misstated something.
9 A. The letter, that is not a correct
10 quote. [REDACTED]
11 [REDACTED]
12 A. Because it was longer.
13 Q. Could I take you to the second page.
14 It seems to have a chart that describes, this
15 says, "Based on information provided to us over a
16 month ago by our secretary and general counsel,"
17 I assume that is Mr. Frazer?
18 A. Yes.
19 Q. "The first 12 invoices the NRA
20 received from the Brewer firm were for these
21 amounts."
22 And then it has a chart from

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1 March 2018 through February 2019, which would be
2 12 months listing the amount for each month, and
3 it totals a little over \$19 million.
4 From your understanding, is that a
5 correct figure?
6 A. I would say the payment would have
7 been correct.
8 Q. So, that is one year, [REDACTED].
9 Was that correct, that it appears
10 that Mr. Brewer was paid [REDACTED] over the
11 course of one year?
12 A. Correct.
13 Q. What is the annual budget of the
14 NRA, do you know?
15 A. No.
16 Q. Is this a significant amount of
17 money?
18 A. I know, but, I can't come up with, I
19 mean, I just --
20 Q. I understand.
21 A. Okay.
22 Q. And that, look, we, we are asking

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1 you to be accurate.
2 So, if you can't recall the number,
3 then --
4 A. No.
5 Q. -- that is a completely appropriate
6 answer.
7 So, did you view [REDACTED] over a
8 one year period as substantial amount of money
9 for the NRA?
10 A. Yes.
11 Q. If I could take you to the third
12 page under the title it says second, it says, "We
13 and others have made multiple requests and
14 recommendations for an outside independent review
15 of the Brewer firm's invoices. All of these
16 requests have been denied.
17 "The secrecy surrounding these large
18 invoices causes suspicions and raises questions."
19 And then he goes on to say, "On the
20 advice of our board counsel, that it was our
21 fiduciary duty to do so, we have made the
22 following request regarding the Brewer invoices."

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1 And then he lists what appear to be
2 a series of requests.
3 When he, when the letter refers to
4 board counsel, do you know who they are referring
5 to?
6 A. Steve Hart.
7 Q. And does this, were you aware of the
8 fact that Steve Hart had advised Lieutenant
9 Colonel North and Mr. Childress that they had a
10 binding fiduciary duty to make requests regarding
11 the Brewer invoices of NRA leadership?
12 A. I don't know what he advised them to
13 do. No. He suggested it to me also.
14 Q. Mr. Hart suggested that there be an
15 examination of these invoices?
16 A. Yes.
17 Q. As described in the letter. And, am
18 I correct, based on your previous answers, that
19 you did not agree with that?
20 A. That is correct.
21 Q. Thanks. I don't believe I have any
22 other questions on -- maybe I could just ask you

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1 a couple of questions.
2 Are you, do you know how much the
3 Brewer law firm is charging the NRA now? On a
4 monthly basis?
5 A. I do not.
6 Q. As the president, are you, is that
7 something you would like to know or should know?
8 A. Well, I have been told; I just
9 cannot tell you. I'm not sure I, if I recalled
10 whether or, I would be able to tell you that.
11 Q. So, you have been told but you
12 simply don't recall the amount?
13 A. Yes.
14 Q. Do you examine the invoices at all?
15 A. No.
16 Q. So, I'm going to take you to Exhibit
17 Number 6. And this big thick thing, and I'm not
18 going to ask you to read it.
19 (Meadows Exhibit Number 6
20 marked for identification.)
21 BY MR. SCHERTLER:
22 Q. What I have divided this up into is

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1 Q. And, you were there as well,
2 correct?
3 A. Yes.
4 Q. The, at some point do you recall
5 Ms. Hallow leaving the room to take a telephone
6 call?
7 A. I recall her leaving the room to
8 take a telephone call. But, it was not from that
9 meeting. It was from the 12 o'clock meeting.
10 Q. Okay. And, what was the 12 o'clock
11 meeting?
12 A. It would have been that same five I
13 named, plus division heads, like legislative, all
14 of that group of people.
15 Q. I see?
16 A. It is a luncheon at noon.
17 Q. And it was at that meeting that
18 Ms. Hallow left to take a call?
19 A. That's correct.
20 Q. And do you know who the call was
21 from?
22 A. I do.

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1 Q. And who was the call from?
2 A. Dan Boren.
3 Q. And did Ms. Hallow come back in the
4 room and report the substance of her call with
5 Mr. Boren?
6 A. Yes.
7 Q. Could you tell us what she described
8 to the group?
9 A. Yes. Shall I do that?
10 MR. COLLINS: Sure, absolutely.
11 THE WITNESS: Yes. She came back
12 into the meeting, said the call was from Dan
13 Boren, that he had said on, that Wayne
14 LaPierre needed to resign, step down, and
15 that if he did not, Ackerman McQueen was
16 prepared, within the next two to three hours,
17 to list very damaging information.
18 It would talk about finances, and
19 personal things related to them.
20 BY MR. SCHERTLER:
21 Q. Do you know if she made reference to
22 Ackerman McQueen filing a lawsuit containing that

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1 information?
2 A. No, writing a letter. Or releasing
3 to the press.
4 Q. And that is what she said?
5 A. Yes. I'm sorry, releasing to the
6 press.
7 Q. And the, and what was the reaction
8 of within the group?
9 Now Oliver North is in that meeting?
10 A. Yes.
11 Q. And Mr. LaPierre was also in that
12 meeting?
13 A. Yes.
14 Q. What was Mr. LaPierre's reaction?
15 A. Actually he left the meeting. And
16 the meeting essentially broke up after that
17 without going through the normal procedure.
18 It was customary we had lunch, went
19 around the table, each person briefly reported
20 what was going on in their area. Almost no
21 reports were given. I can't tell you which ones
22 were.

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1 But, essentially the meeting broke
2 up. There were some left. It was Ollie North,
3 Richard Childress, me, Nick, and Millie.
4 Q. And --
5 A. And that is it.
6 Q. After everybody else left, and the
7 five of you remained, was there any discussion
8 about Mr. Boren's conversation?
9 A. Yes.
10 Q. Can you describe that discussion
11 among the group to us?
12 A. I can. I, everyone --
13 Well, back up.
14 Millie and Nick essentially did not
15 talk.
16 I questioned Ollie and I asked if he
17 was a part of that, if he was aware of it, and,
18 if he agreed with what Dan Boren said in
19 reference to Wayne LaPierre resigning.
20 His answer was not today.
21 And, Richard Childress, I asked
22 Richard, do you agree? He didn't say yes or no.

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1 His answer was well every man has his day.
2 Q. And how did you interpret that?
3 A. Badly.
4 Q. So, what was your reaction to what
5 was, kind of transpiring in front of you with --
6 A. I figured at that point, me, that
7 there was a scheme set forth, that would be
8 revealed quickly in an effort to have Wayne
9 LaPierre step down.
10 Q. And do you know why they would want
11 Wayne LaPierre -- do you have any understanding
12 from the conversations as to why they would want
13 Wayne LaPierre to step down?
14 A. I have no understanding. I have an
15 opinion.
16 Q. But no personal knowledge as to what
17 they said as to what Wayne LaPierre should step
18 down.
19 Did they give a reason?
20 A. Some, yes.
21 Q. What was the reason that they gave?
22 A. That he had been there too long.

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1 He had gone past his usefulness.
2 The Brewer contracts.
3 Q. Those were their concerns?
4 A. That was what they said were their
5 concerns.
6 Q. So, I'm going to show you, and we
7 will go through this. It is a little bit --
8 Exhibit 8.
9 (Meadows Exhibit Number 8
10 marked for identification.)
11 THE WITNESS: Are we finished?
12 BY MR. SCHERTLER:
13 Q. Yes, ma'am. Now, do you know the
14 conversation that Ms. Hallow had with Dan Boren,
15 do you know whether she took notes of that
16 conversation?
17 A. I do not.
18 Q. So she never revealed to you whether
19 she had taken notes?
20 A. Not of that conversation, no.
21 Q. Okay. So, could I take you to the
22 last page of this exhibit?

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1 MR. SCHERTLER: And Mike, do you
2 have a copy?
3 MR. COLLINS: Yes, I do.
4 MR. SCHERTLER: Okay.
5 BY MR. SCHERTLER:
6 Q. First of all, do you recognize any
7 of the handwriting on this particular page?
8 A. I don't.
9 Q. And it is a page that begins, there
10 is a K. Ling after 5:00 p.m., but then there are
11 notes underneath it.
12 A. Yes.
13 Q. First of all --
14 A. I have not seen this.
15 Q. Understood. But do you recognize
16 the handwriting at all?
17 A. I have seen Millie's handwriting.
18 But, I cannot say that --
19 Q. You couldn't say whether it is or is
20 not?
21 A. Absolutely not, no.
22 Q. So, if I could just ask you some

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1 questions about this.
2 At the top of it, maybe in two
3 inches down it says Boren conversation.
4 Do you see that?
5 A. Yes.
6 Q. And then it says 12:04 p.m., Dan
7 Boren.
8 A. Yes.
9 Q. And that would correspond with I
10 think what you described as the meeting right
11 around lunch where Millie Hallow left to take a
12 call from Mr. Boren?
13 A. Correct.
14 Q. And then there is a reference to a
15 text message that appears it says 12:03 text,
16 "Millie this is Dan Boren, I need to talk to you
17 right now. I know you are going into a meeting."
18 And then underneath that there are
19 two separated lines and it says, "Millie, it is
20 Dan," and the response, "Dan I need to step out."
21 At the bottom it says, "I have, I
22 have," I believe it says, "intel."

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1 A. Intel.
2 Q. "That in the next two to three hours
3 Ackerman McQueen will file a lawsuit that will
4 have negative implications and impact for Wayne."
5 Do you see that?
6 A. I do.
7 Q. So, it makes a reference to Ackerman
8 McQueen filing a lawsuit in the next two to
9 three hours.
10 Is that fair to say?
11 A. From what it says.
12 Q. From what it says, yes.
13 A. Yes.
14 Q. And you don't have a recollection
15 from Ms. Hallow making reference to a lawsuit
16 when she came back in the room?
17 A. I knew she said something. I would
18 have said, which I did say earlier, I thought it
19 was press release.
20 Q. Could it have been lawsuit?
21 A. Absolutely.
22 Q. Okay. Let me, later that afternoon

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1 were you present for another, were you present
2 for --
3 A. I'm seeing this now.
4 Q. Sorry.
5 A. No, okay. I'm sorry.
6 Q. No, that is okay. I know I put all
7 of that in front of you.
8 And in fact I am, hold onto it
9 because I would like to ask you a little bit
10 about this in a moment.
11 A. Sure.
12 Q. The, were you at least an ear
13 witness to a conversation that Ms. Hallow had
14 with Lieutenant Colonel North?
15 A. Yes.
16 Q. Could you describe the, what led up
17 to that conversation?
18 A. Yes. For whatever reason, Wayne
19 LaPierre was using Millie's phone, while he was
20 on the phone, he, I was there, actually he was on
21 the phone.
22 Q. And where were you all at that

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1 point?
2 A. We were in Wayne LaPierre's suite.
3 We had moved from Ollie's.
4 Q. I see. And could I stop you there
5 for a moment. Between the time that you learned
6 from Millie about the Boren call and now, which
7 is later in the afternoon, had you had any
8 discussions with Mr. LaPierre about what had
9 occurred?
10 A. Yes.
11 Q. What were those discussions with
12 Mr. LaPierre?
13 A. It was whether or not a coup was
14 coming about.
15 If there would be a vote at the
16 board meeting to remove him.
17 And, that it would be wise of us to
18 get in touch with board members that would
19 support Wayne.
20 Q. So, is this one of the things that
21 you had been doing up until this point?
22 Contacting board members to see if they would

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1 support Mr. LaPierre?
2 A. Yes, actually asked them to come to
3 an informal meeting.
4 Q. And this would be some board members
5 among the entire 76 that made up the board at the
6 time?
7 A. Yes.
8 Q. What was Mr. LaPierre's reaction to
9 what he had heard Millie Hallow say about Dan
10 Boren?
11 A. Disappointment. Hurt.
12 Q. So, and I am sorry, I interrupted
13 you.
14 So, at some point you said while you
15 were doing this in Mr. LaPierre's suite,
16 Mr. LaPierre was using Ms. Hallow's cell phone?
17 A. Yes, I don't know why that came
18 about, that, I know for a fact that occurred
19 while he was talking, a call from Ollie North
20 came in on her phone. He looked at it, and
21 showed it to her and Millie looked at me and said
22 I need to return that phone call. May I use your

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1 phone? Come with me, and we went into a bedroom.
2 Q. Uh-huh.
3 A. And she called Colonel North on my
4 phone and he answered the phone, according to
5 her, well hello Carolyn, and, because, it was
6 ID'd.
7 And she explained to him who it was.
8 That her phone was in use so she was using mine.
9 And he proceeded with the
10 conversation. So that she could take notes, she
11 put him on speaker.
12 Q. So, in this conversation you were
13 aware of the fact that she was taking notes?
14 A. Absolutely. I took notes.
15 Q. Okay. And you took notes as well?
16 A. After he was put on speaker phone.
17 Q. Okay. So you both had the ability
18 to get a pen and some paper that you could write
19 on and the conversation was now on speaker phone?
20 A. Correct.
21 Q. And is it fair to say that because
22 the conversation was on speaker phone you were

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1 able to hear the entirety of the conversation?
2 A. Not the entirety.
3 Q. Okay.
4 A. The first 30 seconds -- I could hear
5 Carolyn, because she was kind of holding the
6 phone away.
7 MR. COLLINS: You could hear Millie.
8 THE WITNESS: No, I could here
9 Colonel North say Carolyn, because he thought
10 that it was me. Then, I didn't hear anything
11 until she put him on the speaker phone.
12 BY MR. SCHERTLER:
13 Q. Okay. And, then can you describe
14 what you did here?
15 A. I can.
16 Q. Would you?
17 A. Yes.
18 Q. And just, and I apologize.
19 But, just in front of you I think if
20 I'm not mistaken, this appears, these are not
21 your notes, the page that you are looking at?
22 A. They are not. Do you have my notes?

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1 Q. Yes, I do. I will show them to you
2 in just a moment?
3 A. You probably can't read them.
4 Q. Oh, no, you write very well?
5 A. I was writing quickly.
6 He went into several issues about
7 Wayne having to resign.
8 He went in to issues of his clothing
9 to Josh. He talked about Josh; he talked about
10 Tyler spending millions of dollars or half a
11 million dollars, I'm not sure, but like millions
12 of dollars on extravagant trips.
13 I'm trying to remember everything.
14 I wish you had let me keep my notes.
15 Q. So, I don't want to -- I don't want
16 to play a, you know, a, kind of a game of hide
17 and go seek with you.
18 So, let me do this. Let me show you
19 what has been marked as Exhibit 10.
20 (Meadows Exhibit Number 10
21 marked for identification.)
22 THE WITNESS: Okay, but, most --

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1 yes, that would be mine.
2 BY MR. SCHERTLER:
3 Q. I'm not, you know, obviously if I
4 get your recollection. But, if the notes help
5 refresh your recollection I would like you to be
6 able to --
7 A. Well it really would, in order.
8 I write times down. And, according
9 to my watch, that call was 2:58.
10 Q. Uh-huh.
11 A. Millie, you can see it, had told
12 Boren, or, Boren had read that Ackerman McQueen
13 letter to her, she told Ollie that.
14 Q. And could I just interrupt you for a
15 moment to try to get a little clarity on that.
16 It says, "Told him Boren called.
17 Read Ackerman McQueen letters."
18 Do you recall that the, Steve Hart
19 e-mail that appears to forward those letters was
20 a couple of days earlier?
21 A. It, he did not, that was not part of
22 what was said.

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1 Q. Okay.
2 A. I would think that it was
3 referencing that. So, that is why I didn't say
4 lawsuit. I thought that it would be a press
5 release or a letter.
6 Q. But it appears to reference those
7 letters that Mr. Winkler had sent to the NRA a
8 couple of days earlier, is that --
9 A. Perhaps.
10 Q. Okay.
11 A. Millie asked Ollie if he had a copy
12 of it.
13 And, he said no. I don't want
14 anything with Ackerman McQueen letterhead on it.
15 I thought that was strange.
16 Q. Okay.
17 A. He said the financial problems are
18 just out of hand, and I'm abbreviating what --
19 Q. Yes.
20 A. It went fairly quickly.
21 And the sexual charges against Josh,
22 the excessive shopping, and the millions Tyler

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1 had spent, excessive travel, and the apartment
2 for his niece which, in fact, was not his niece,
3 but, that was what he said.
4 And, he said if Wayne withdraws his
5 lawsuit and resigns, and if I am still president,
6 I can make it well-worth his time money wise, his
7 retirement would be good and there should be
8 another page.
9 Q. Yes, ma'am.
10 A. And, he said the window may close
11 quickly. And he said Ackerman McQueen in the
12 next two or three hours will be releasing
13 damaging information.
14 Q. And these are your notes?
15 A. Absolutely.
16 Q. So, could I --
17 A. And she then, she then, for whatever
18 reason, took him off speaker. And there was more
19 conversation that I don't know.
20 Q. Okay. Between Ms. Hallow and
21 Lieutenant Colonel North?
22 A. Correct.

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1 Q. Do you know why she took him off
2 speaker?
3 A. I don't know.
4 Q. So you didn't, you weren't able to
5 hear that part of it?
6 A. It was very short. But, no, I did
7 not. The last page of this was Ackerman McQueen
8 will release damaging information.
9 Q. Right.
10 A. That was the last I heard.
11 Q. And could I take you now to this
12 page of the previous exhibit which is eight.
13 So, the beginning, first of all, do
14 you recognize these as -- you were aware of the
15 fact that Ms. Hallow was taking notes for this
16 second conversation with Lieutenant Colonel
17 North?
18 A. Yes.
19 Q. And are you able to say whether
20 these are her notes or not?
21 A. I would think so. But, you know, I
22 can't swear to it.

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1 Q. It is not like you could recognize
2 her handwriting?
3 A. She writes different ways. She
4 writes big sometimes, and little and legible and
5 I think that it is -- I absolutely do.
6 And it was on a yellow lined pad.
7 Q. I see. And so if I could just walk
8 you through this.
9 It says, "Ollie called me. I called
10 him back on CM phone."
11 And that could be --
12 A. Me.
13 Q. You Carolyn Meadows. 2:58 p.m., I
14 think that is the same time you have in your
15 notes?
16 A. Yes.
17 Q. And then she describes, what I would
18 like to do is walk through with you and see if
19 this is a fair recollection based on what you
20 recall. "Devastating account of financial status
21 first."
22 Does that seem to be something that

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1 Lieutenant Colonel North said?
2 A. Yes.
3 Q. Then "sexual harass/Josh." That
4 seems to be a reference to sexual harassment
5 allegation against Mr. Powell?
6 And then she mentions
7 "Wayne/clothing," right below that, "Schropp-one
8 half million luxurious travel."
9 A. How is it millions.
10 Q. And then it says, I can't read the
11 word but it says, but "Not all regarding NRA or
12 apartment for Susan's niece."
13 And then "Immediate resignation of
14 Wayne. Window is short. Ollie willing to
15 negotiate X months for W." Something about
16 excellent retirement, not share if W is with Josh
17 and Bill?
18 A. And I did not hear that.
19 Q. Okay. She does not, in her notes,
20 she makes no reference to Ackerman McQueen?
21 A. Right. And I have not seen this,
22 for your information.

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1 Q. Understood. And I'm just asking you
2 about that.
3 A. Okay.
4 Q. The, so, let me ask you this?
5 After this conversation with -- did
6 Lieutenant Colonel North ever say that he was
7 calling on behalf of anybody at Ackerman McQueen?
8 A. Not in the conversation I heard.
9 Q. So, not in the conversation you
10 heard.
11 A. Right.
12 Q. Did he ever say that he had been
13 instructed by someone at Ackerman McQueen to
14 call?
15 A. No.
16 Q. Did he ever say he was directed by
17 someone at Ackerman McQueen to call with this
18 proposal?
19 A. He did not.
20 Q. Did he make any reference to any
21 individual at Ackerman McQueen in this
22 conversation?

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1 A. Not that I heard.
2 Q. When you, after this conversation
3 ended, what did you and Ms. Hallow do?
4 A. There, we went back into the common
5 room. There were several people there.
6 And, we discussed the phone call. I
7 mean, we were really discussing by then, yes.
8 Q. And so, who was in the room at that
9 point?
10 A. I can't, I absolutely cannot
11 remember everyone.
12 Q. Was Mr. LaPierre there?
13 A. He was. There were several people.
14 One person I know for sure was Sandy Froman, a
15 board member. Todd Rathner, a board member.
16 Scott Bach, a board member.
17 And, I could speculate on two or
18 three others. But, I'm not sure.
19 Q. But those are the people that you do
20 recall?
21 A. Those I do recall.
22 Q. Can you describe what the discussion

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1 was?
2 A. I can. When the discussion laying
3 out what had happened in the 11 o'clock meeting,
4 12 o'clock meeting, this phone call, there was
5 talk calling this extortion. Which Sandy Froman,
6 who is an attorney, said that sounds like
7 extortion.
8 And we didn't dwell on that. But,
9 by then we were in serious discussion about the,
10 a vote coming up at the board meeting to replace
11 Wayne.
12 And, we were getting serious then
13 about rallying our troops, so to speak.
14 Q. So, in other words, in anticipation
15 that there might be a board vote.
16 A. Coup.
17 Q. And that might lead to a vote?
18 A. Yes, a vote.
19 Q. As to whether Mr. LaPierre should
20 stay in power or not, you were marshalling
21 support among the directors for Mr. LaPierre?
22 A. Yes.

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1 Q. Just give me one minute.
2 MR. COLLINS: Maybe at some point we
3 will be at a transition point to break.
4 MR. SCHERTLER: Thanks Mike. Let me
5 just get my bearings here for a moment.
6 So, could I just go into another
7 maybe five minutes or so?
8 MR. COLLINS: Of course.
9 THE WITNESS: I'm good.
10 BY MR. SCHERTLER:
11 Q. I'm going to show you Exhibit 11.
12 It is a nice short one. And we are done with
13 those.
14 (Meadows Exhibit Number 11
15 marked for identification.)
16 THE WITNESS: Thank you.
17 BY MR. SCHERTLER:
18 Q. Have you seen this before?
19 A. I have not seen it.
20 Q. Okay. It does seem to be a March --
21 sorry, April 24, 2019, e-mail from Millie Hallow.
22 Addressed to Ollie North, copied to Nick Perrine,

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1 Richard Childress and you.
2 A. Yes.
3 Q. You don't have a recollection of
4 this?
5 A. I just don't remember it. I
6 remember it happening. I don't remember seeing
7 it.
8 Q. In it she says, "Dear Colonel North,
9 I understand the messages that you delivered on
10 behalf of Ackerman McQueen and yourself.
11 "Per your request, I shared this
12 information with Wayne. This note confirms that
13 he will not endorse you for another term as NRA
14 president. Sincerely, Millie."
15 First of all, do you know why
16 Ms. Hallow was tasked with sending what seemed to
17 be a rather important e-mail like this?
18 A. Wait a minute. One time is 21 --
19 maybe -- so, what time is that. 1:34.
20 Q. So military time. So I think that
21 is in the evening, so 2100 is 9:00 p.m.
22 A. Okay.

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1 Q. So, 2134 would be about 9:34 p.m.
2 A. Okay. Yes.
3 Q. Yeah, that is right.
4 So again my question was why was
5 Millie Hallow tasked with sending this to Oliver
6 North as opposed to coming from maybe
7 Mr. LaPierre?
8 A. Number 1, he does not text. So,
9 very often he would ask her to relay a message
10 for him.
11 Q. Okay. And, do you know whether
12 Ms. Hallow wrote this e-mail or whether somebody
13 wrote it for her?
14 A. I don't know.
15 Q. Do you know whether Mr. Powell was
16 involved in drafting this e-mail?
17 A. I do not.
18 Q. Are you aware of the fact that
19 Ms. Hallow has testified that this message
20 contains information she regards as false and
21 that she felt uncomfortable sending it?
22 MR. COLLINS: Objection to the form.

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1 THE WITNESS: I definitely do not
2 know that.
3 BY MR. SCHERTLER:
4 Q. Do you know that Ms. Hallow would
5 say that the reference in here to the message you
6 delivered on behalf of Ackerman McQueen where it
7 refers to Ackerman McQueen is not true?
8 MR. COLLINS: Objection to the form.
9 THE WITNESS: Ask your question
10 again.
11 BY MR. SCHERTLER:
12 Q. Do you know that Ms. Hallow has said
13 that the reference to Ackerman McQueen, that the
14 message being delivered on behalf of Ackerman
15 McQueen is not true?
16 MR. COLLINS: Objection to the form
17 of the question.
18 THE WITNESS: No. I do not.
19 BY MR. SCHERTLER:
20 Q. You have no knowledge one way or the
21 other?
22 A. No.

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1 Q. Okay.
2 MR. SCHERTLER: Okay. I think this
3 would be a good time to take a break, Mike.
4 (Recess taken -- 2:30 p.m.)
5 (After recess -- 2:55 p.m.)
6 (Meadows Exhibit Number 13
7 marked for identification.)
8 BY MR. SCHERTLER:
9 Q. I would like to show you Exhibit 13.
10 So, and actually before I ask you to
11 take a close look at that, Ms. Meadows, what did
12 happen after the Oliver North phone call on
13 April 24th.
14 What happened at the meeting as you
15 recall? Was there a vote by the Board of
16 Directors regarding Mr. LaPierre?
17 A. No.
18 Q. And why not? Why did that not
19 happen?
20 A. It didn't come up.
21 Q. Do you know why it didn't come up?
22 A. Ollie North forces didn't have the

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1 votes and they knew.
2 Q. I'm sorry, the Ollie North what?
3 A. The Ollie North people -- Ollie did
4 not have the votes on the board.
5 Q. So, he did not have enough support
6 on the board to bring this to a vote?
7 A. No, not even close. No.
8 Q. And ultimately Oliver North,
9 ultimately Wayne LaPierre issued a public
10 statement to the board about this, right?
11 A. Yes.
12 Q. And ultimately Oliver North resigned
13 as president?
14 A. He just didn't run again.
15 Q. Why was that, do you know?
16 A. He knew he wouldn't be elected.
17 Q. So at this point, based on what had
18 occurred, he would not have enough support on the
19 board to be re-elected president?
20 A. Correct.
21 Q. And is that because Mr. LaPierre
22 would not be supportive of Mr. North as

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1 continuing in another term as president?
2 MR. COLLINS: Objection to the form.
3 THE WITNESS: It really wouldn't
4 have had anything to do with Wayne. The
5 board at that point would not.
6 BY MR. SCHERTLER:
7 Q. Would not have voted in favor of?
8 A. To support Colonel North.
9 Q. Okay. So, let me ask you -- with
10 that background, let me ask you to take a look
11 at -- so, how did it become then that you were
12 the lucky person to assume the presidency?
13 A. I was drafted.
14 Q. Who drafted you?
15 A. A committee of board members just
16 sat down with me and said you are it. In this
17 time in what is going on, you are our person.
18 Q. Okay. And, was it at that meeting
19 in Indianapolis that you were elected president?
20 A. Yes.
21 Q. So, again, I'm sorry to interrupt
22 you. But, please take a look at Exhibit 13.

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1 A. The minutes from that board meeting
2 that would have had speeches?
3 Q. I don't know to tell you the truth?
4 A. These are not my remarks.
5 Q. Oh, these are not the actual
6 remarks?
7 A. No.
8 Q. Well, do you mind if I ask you a
9 couple of questions about this draft?
10 A. Well, yeah, but, I mean, the --
11 anybody walking down the street could look at the
12 minutes of any of our meetings.
13 Q. Sure.
14 A. Which gives every officer's remarks.
15 But, this, I mean, a lot of it is
16 what I said. But, a lot of it is not. That is
17 not my speech.
18 Q. Understood. Well, I'm sorry, this
19 is all I have for now, so let me go ahead and ask
20 you a few questions about this.
21 And you can correct me if there is
22 anything in here that was not part of your

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1 speech.
2 A. Okay. Please.
3 Q. If I could just start with the cover
4 e-mail, it appears to be dated April 29th, 2019.
5 It is from Andrew Arulanandam to Andra Fischer.
6 Just, who is Andrew Arulanandam?
7 A. He is our PR head.
8 Q. So, he is head of public relations
9 for the NRA; is that correct?
10 A. Yes, he deals with press, helps with
11 some speech writing.
12 Q. Okay.
13 A. Yes.
14 Q. And, who is Andra Fischer?
15 A. She works directly for Wayne,
16 secretarial duties.
17 Q. And, this seems to be subject is CM
18 Remarks revised as you say 2.doc.
19 Is this an earlier draft of remarks
20 that you were to make as the meeting?
21 A. Perhaps. But, I don't think I ever
22 received this.

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1 Q. You don't recall ever receiving
2 this?
3 A. No.
4 Q. So, who would prepare your remarks?
5 A. Actually, several people would weigh
6 in on it.
7 Andrew would, Millie would, Vanessa
8 perhaps. And me. I mean, I write a lot of it
9 and then making sure there are no grammatical
10 errors and so forth.
11 Q. I see.
12 A. But, I mean that type speech I did
13 make. But, it, this, it --
14 I mean it was just not it.
15 Q. Understood. Let me ask you, just if
16 I could go to Page 2 of this. And when I say
17 Page 2 I'm talking about Page 2 of the actual
18 draft. So it would be a third page of the
19 document.
20 Could I go to the third full
21 paragraph. It says, and let me, and what I'm
22 asking you is, you know, if this is accurate.

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1 But, it says, "Millie Hallow was not
2 the only witness to Colonel North's conduct."
3 And you have already testified that
4 you overheard at least a good portion of that
5 conversation. Correct?
6 A. Correct.
7 Q. It says, then you say, "What Wayne
8 stated is absolutely true. Colonel North
9 telephoned Millie and transmitted an ultimatum on
10 behalf of Ackerman directed at Wayne, directed to
11 Wayne."
12 What exactly did Colonel North say
13 that lead you to believe he was delivering the
14 ultimatum on behalf of Ackerman? Is that
15 accurate?
16 A. Well number one, that is not my
17 statement.
18 But, if it were, he, he did give an
19 ultimatum. Which, when I explained that.
20 Q. Yes.
21 A. If he did not resign, then there
22 would be bad press.

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1 If he did do it, he would be
2 compensated financially.
3 Q. Understood. But, I guess I'm just
4 focusing on an ultimatum on behalf of Ackerman.
5 I didn't see that in any of your
6 prior testimony or your notes?
7 A. Actually in my notes, early on there
8 was an A/M.
9 Q. Yes.
10 A. So.
11 Q. But there is a reference to Ackerman
12 McQueen filing a lawsuit or, I think in your
13 notes it says letters.
14 A. Correct.
15 Q. But you also think, in your
16 testimony earlier, Colonel North at no time said
17 he was acting on behalf of someone at Ackerman
18 McQueen, correct?
19 A. I don't recall that. I believe he,
20 in fact, was.
21 Q. But he never said during the
22 conversation that he was acting?

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1 A. I don't know that.
2 MR. COLLINS: Objection to the form.
3 BY MR. SCHERTLER:
4 Q. So, just to be clear, do you have
5 any recollection of Colonel North saying that he
6 was acting on behalf of anyone at Ackerman
7 McQueen?
8 A. He did not say it in your words.
9 No.
10 Q. Okay. Did he ever say in the
11 conversation you overheard that he was acting at
12 the direction or instruction of anybody at
13 Ackerman McQueen?
14 A. I would say no.
15 Q. Did he ever saying that he had
16 discussed this ultimatum with anybody at Ackerman
17 McQueen?
18 A. No.
19 Q. If I could go down, just in that
20 same paragraph, this continues to say, not you,
21 "The demand was that Wayne must resign
22 immediately and support Ackerman's chosen

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1 leadership slate."
2 I don't recall seeing anything in
3 the notes about Ackerman's leadership slate.
4 Is that, is that accurate or was
5 that part of your speech?
6 A. No, it was not part of my speech.
7 Q. So, there is no reference at all in
8 Lieutenant Colonel North's conversation about
9 having Ackerman McQueen's chosen leadership
10 slate, correct?
11 MR. COLLINS: Objection to the form.
12 BY MR. SCHERTLER:
13 Q. Is that correct?
14 A. That is correct.
15 Q. So, somebody else put that in here?
16 A. Not me.
17 Q. Not you.
18 A. I believe they had a slate, but.
19 Q. Well, when you say you believe they
20 had a slate, you believe that, but you don't have
21 any evidence that says that they had a slate?
22 A. No.

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1 Q. Could I take you to the next page.
2 In this draft, which I understand is
3 not the final speech, you say -- and forgive me.
4 It says, "Now regarding another item
5 Colonel North's inquiries relating to our outside
6 counsel the Brewer law firm."
7 It goes on to say, "I believe
8 Colonel North is trying to unseat the Brewer law
9 firm."
10 Is that part of your speech?
11 A. No.
12 Q. It also says "Even as it manages an
13 oppressive body of work that I believe is vital
14 to our organization." Was that part of your
15 speech?
16 A. No.
17 Q. It then says, "I have been in more
18 than a dozen meetings with the firm's
19 representatives," do you see that?
20 A. I see that.
21 Q. Is that accurate?
22 A. Possibly. I did not say that. I

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1 have been in a lot of meetings with them.
2 Q. With Brewer, representatives of the
3 Brewer law firm?
4 A. Yes.
5 Q. It also says, "They are engaged in
6 extraordinary efforts and produce compelling
7 advocacy."
8 Were you familiar with all of the
9 legal work that they were doing at that time?
10 A. Not all.
11 Q. Was this part of -- was this
12 statement, "engaged in extraordinary efforts and
13 produced compelling advocacy" a part of your
14 speech?
15 A. No. It doesn't mean I disagree with
16 some of this.
17 Q. Understood. So, could I go to the
18 previous page one more time? This would be the
19 second page of the draft.
20 At the very bottom of the page it
21 says, "I intend to request an opinion from board
22 counsel regarding the appropriate way forward."

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1 Was that part of your speech?
2 A. No.
3 Q. So a lot of this seems to be
4 substantially different from the remarks you
5 ultimately gave to the board. Is that correct?
6 MR. COLLINS: Objection to the form.
7 BY MR. SCHERTLER:
8 Q. You can answer.
9 A. Restate.
10 Q. A lot of what is in this draft seems
11 to be not part of what you ultimately gave in
12 your remarks to the board.
13 Is that fair to say?
14 A. That is fair to say.
15 Q. That is all right. We will try to
16 look for the actual remarks.
17 Could I show you Exhibits 14A
18 and 14B.
19 (Meadows Exhibit Number 14A
20 marked for identification.)
21 (Meadows Exhibit Number 14B
22 marked for identification.)

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1 BY MR. SCHERTLER:
2 Q. And I don't need you to read these
3 in detail. I do want you to be able to look at
4 them so you are familiar with at least what they
5 are.
6 But, I think what I can represent is
7 that the first 14A is a May 2nd, 2019, article by
8 Mark Maremont of the Wall Street Journal titled
9 NRA Chief Wayne LaPierre Questioned About Travel
10 Expenses.
11 14B is a May 11th, 2019 Wall Street
12 Journal that says Leaked Letters Reveal Details
13 of NRA Chief's Alleged Spending.
14 Are you familiar with these
15 articles? Or were you familiar with them when
16 they came out?
17 A. When they came out, yes.
18 Q. Did you review them when they came
19 out?
20 A. I read them.
21 Q. Okay. If I could, looking at what
22 is 14B, if I could take you to the second page.

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1 In the second paragraph there seems
2 to be a statement attributable to you.
3 It says, "The NRA released the
4 statement from Carolyn Meadows, its new
5 president, who said that, who said, 'The entire
6 board is fully aware of these issues.
7 'We have full confidence in Wayne
8 LaPierre.'"
9 Do you see that?
10 A. Yes.
11 Q. Was that a comment that was made
12 attributable to you in the press?
13 A. Yes.
14 Q. And when you said the entire board
15 is fully aware of these issues, what did you
16 mean?
17 A. It meant that a letter actually had
18 been sent to the board. And that they, we had
19 been open and I don't think there was anyone in
20 doubt about what was going on.
21 Q. Okay. When you say a letter had
22 been sent to the board, what letter had been sent

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1 to the board?
2 A. I don't even know when.
3 But, actually Wayne even sent a
4 letter to the board at some point as I recall.
5 Q. And a letter that said what?
6 A. That we were moving on; things were
7 going to be -- it was a rah-rah type letter.
8 Q. Okay. But, if I could take you to
9 the first page of the 14B, which is the May 11th,
10 2019 article.
11 It begins by saying, "National Rifle
12 Association chief executive, Wayne LaPierre
13 billed the group's ad agency \$39,000 for one day
14 of shopping at a Beverly Hills clothing boutique,
15 18,300 for a car and driver in Europe, and had
16 the agency cover \$13,800 in rent for a summer
17 intern according to newly revealed NRA internal
18 documents."
19 It then goes on to say, "The
20 documents posted anonymously on the internet
21 provide new details of clothing, travel, and
22 other expenses totaling more than \$542,000 that

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1 Ackerman McQueen alleges Mr. LaPierre billed to
2 it."
3 And then on the next page it says
4 your comment is "The entire board is fully aware
5 of these issues."
6 When that statement was made, was it
7 made with the intent to say that the board is
8 fully aware of all of the issues related to the
9 expenses that were being reported anonymously?
10 A. No.
11 Q. So, the board was not aware of
12 those?
13 A. Of this?
14 Q. Of the expenses that were being now
15 reported publicly?
16 A. Of the accurate expenses they would
17 have.
18 This is not accurate.
19 Q. So, the amounts given here are not
20 accurate?
21 A. No.
22 Q. So, you don't think that \$39,000 for

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1 one day of shopping at Beverly Hills clothing
2 boutique was accurate?
3 A. It could have been.
4 Q. And 18,300 for a car and driver?
5 A. The 542,000 would be for the total.
6 Q. So, before these articles came out,
7 was the board aware of -- I know you have said
8 you had no problem with the clothing expenses.
9 A. Right.
10 Q. But, was the board aware take that
11 Mr. LaPierre over a 17-year period had spent
12 \$276,000 in clothing at the Zegna store in
13 Beverly Hills?
14 A. The number, the dollar amount I
15 believe they would have known about.
16 Perhaps not where. I just don't
17 recall that.
18 Q. Were you aware of the fact that
19 Mr. LaPierre, the clothing that Mr. LaPierre
20 purchased at the Zegna store was purchased on the
21 credit or a credit card belonging to Ackerman
22 McQueen?

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1 A. Yes, I was told that.
2 Q. Why would you do that?
3 MR. COLLINS: Objection to the to
4 remain.
5 THE WITNESS: Why would you not?
6 BY MR. SCHERTLER:
7 Q. Well, why not, so, if I go into
8 Brooks Brothers I pull out my credit card and I
9 by my clothing with my credit card.
10 Now, look, if I thought that my firm
11 should pay for my clothing, which it does not, I
12 could pull out my firm AmEx card and have it
13 billed to Schertler & Onorato.
14 Why would Wayne LaPierre go into a
15 luxury store in Beverly Hills, buy thousands of
16 dollars worth of clothing, for which there may be
17 a good reason in your view, and bill it to
18 Ackerman McQueen as opposed to putting it on an
19 Ackerman McQueen credit card?
20 MR. COLLINS: Objection to the form,
21 go ahead.
22 THE WITNESS: Because Ackerman

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1 McQueen made the appointment, told him to go
2 there to be fitted for clothes.
3 BY MR. SCHERTLER:
4 Q. Sure. And somebody may say to me,
5 Dave, go to Brooks Brothers and get fitted for
6 clothes.
7 I still pull out my Schertler &
8 Onorato credit card to pay for it.
9 I don't pull out the credit card
10 belonging to someone else to pay for it.
11 Why would there be an arrangement
12 that Wayne LaPierre's clothing purchases at an
13 expensive store in Beverly Hills be done through
14 a, through Ackerman McQueen as opposed to just
15 directly billing the NRA for it?
16 A. Because --
17 MR. COLLINS: Objection to the form.
18 If you know.
19 THE WITNESS: I do know.
20 MR. COLLINS: Okay, sure.
21 THE WITNESS: Because Ackerman
22 McQueen, as I said, made the appointment.

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1 Charlton Heston had even recommended
2 that Wayne go to his clothier.
3 So, if Ackerman McQueen made the
4 appointment and told him to go there, and
5 probably, I don't know that, they told him to
6 use, to charge it to Ackerman McQueen.
7 BY MR. SCHERTLER:
8 Q. Okay. So first you don't know that
9 they told him to charge it there?
10 A. I do not know that.
11 Q. Okay.
12 A. I do know they made the appointment
13 and told him to go.
14 Q. Understood. Is there anything that
15 you can think of regulatory, within the bylaws of
16 the NRA, anything, rule regulation, law, that
17 would prevent Mr. LaPierre from pulling out an
18 NRA credit card and buying the clothes directly
19 with his NRA credit card.
20 Anything to prevent him from doing
21 that?
22 MR. COLLINS: Objection to the form.

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1 THE WITNESS: No. In the rules or
2 bylaws?
3 BY MR. SCHERTLER:
4 Q. Yes. Anything to prevent him.
5 A. No. Certainly not.
6 Q. So, he could have paid for those
7 clothing with an NRA credit card, correct?
8 A. Absolutely.
9 Q. And he could have paid for all of
10 his travel through the NRA and not gone through
11 Ackerman McQueen, correct?
12 A. Well it would have been foolish.
13 Q. Why?
14 A. Because our travel, we are
15 compensated for our travel.
16 Q. Sure. But why not just, so, if I
17 travel, I charge the law firm and the law firm
18 may charge the client.
19 Why not just, if I'm going to
20 travel, why not just charge the NRA?
21 A. Then you have to turn in an expense
22 report.

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1 Q. But isn't that what you are supposed
2 to do?
3 A. Not if it is prearranged.
4 Q. Okay. Let me -- so, but your
5 recollection is that, let's say just the example
6 of the, I think it is \$276,000 and change at the
7 Zegna store over a number of years, I do agree
8 that that is true.
9 But, that was something that the
10 board was aware of contemporaneously at the time
11 those purchases were being made?
12 A. No.
13 Q. So the board was not aware of it?
14 A. Not at the time of the purchase.
15 Q. When did the board become aware
16 of it?
17 A. I don't know the day. But they were
18 made aware of it.
19 Q. After all of this came to light in
20 the press?
21 MR. COLLINS: Objection to the form.
22 THE WITNESS: Actually before it

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1 came aware in the press. At least before
2 Maremont.
3 BY MR. SCHERTLER:
4 Q. So, around the time that Mr. Winkler
5 issued those letters on April 22nd?
6 A. I don't remember the date.
7 Q. Okay.
8 A. I should. I don't remember.
9 Q. But it wasn't before that.
10 I guess what I'm trying to get at
11 it, it wasn't as though the board was being
12 informed of these expenses and saying oh that is
13 fine.
14 A. They were not.
15 Q. Okay. And, without getting into it,
16 were you --
17 Who was Allen West?
18 A. A board member. A current board
19 member.
20 Q. So, Mr. West is still a board
21 member?
22 A. Yes.

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1 Q. And, do you know a Timothy Knight?
2 A. Yes.
3 Q. Is he also a current board member?
4 A. No.
5 Q. Has he resigned from the board?
6 A. He didn't run.
7 Q. I see. And are you aware that
8 shortly after these articles came out, Mr. West
9 was, made public statements that the board had
10 not been informed of all of these expenses that
11 were coming out in the Wall Street Journal
12 articles?
13 A. I'm aware of his statement.
14 Q. And that he also called for
15 Mr. LaPierre to resign?
16 A. I'm aware of that.
17 Q. Do you think that statement that
18 Mr. West made about not being informed of these
19 expenses was incorrect?
20 MR. COLLINS: Objection to the form.
21 THE WITNESS: I, I just wouldn't
22 comment on what he would think.

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1 BY MR. SCHERTLER:
2 Q. Okay. Would you give me just one
3 moment.
4 And I'm done with those.
5 What kind of, in the roles that you
6 have played as the second vice president, as the
7 president, or as a director, what interaction
8 have you had with employees or management at
9 Ackerman McQueen, if any?
10 A. Almost none. Very little.
11 Q. Is there anybody that you have
12 actually met from Ackerman McQueen in person?
13 A. Yes.
14 Q. Who would that be?
15 A. What the heck is his name. A speech
16 writer. I can't come up with his name.
17 Q. Is he in Oklahoma City or is he here
18 in --
19 A. No, he is here.
20 Q. Would it be Bill Bowers?
21 A. No.
22 Q. Tony Makris?

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1 A. No.
2 Q. Nader Tavangar?
3 A. Nader, yes, Nader, yes.
4 Q. Beth knows, but, I think --
5 MR. COLLINS: No, just to see if it
6 refreshes her memory.
7 THE WITNESS: Well, it is not like
8 it is John or Michael or Bill, or -- or Dave?
9 BY MR. SCHERTLER:
10 Q. So, you have met Mr. Tavangar?
11 A. Yes.
12 Q. And did he write some of your
13 speeches?
14 A. Yes.
15 Q. Did he write some of your speeches
16 as president?
17 A. No.
18 Q. Okay. And I hate, I apologize for
19 doing this.
20 But, you know, we just looked at
21 those articles in the Wall Street Journal?
22 A. Maremont.

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1 Q. Maremont's articles. And I think in
2 those articles there is information that he is
3 printing about, one point, in his second article
4 on May 11th, he makes reference. He says, "The
5 documents posted anonymously on the internet
6 provide new details of the clothing, travel, and
7 other expenses totaling more than what he says is
8 \$542,000 that Ackerman McQueen alleges
9 Mr. LaPierre billed to it."
10 Do you have any personal knowledge
11 as to how Mr. Maremont got any of that
12 information?
13 A. He interviewed Wayne LaPierre on
14 more than one occasion. The erroneous
15 information that he has printed, I do not know
16 how he got it.
17 Q. So, you have no idea how he obtained
18 the information that he put in his articles in
19 May of 2019?
20 A. I do not.
21 Q. And have you ever been told that
22 there is evidence as to how he got that

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1 information?
2 A. No.
3 Q. So, you have no awareness of where
4 he got that from?
5 A. Well there is speculation. I have
6 no awareness.
7 Q. I'm not asking for speculation. I'm
8 just asking for actual knowledge or whether
9 somebody has told you we have actual evidence
10 that this was given to Mr. Maremont by this
11 person or that person.
12 A. No.
13 Q. Again, in your capacity with, as an
14 officer of the NRA, or as a director, nobody else
15 that you have met in person at AMC other than
16 Mr. Tavangar, as far as you recall?
17 A. As far as I recall, no.
18 Q. Have you ever interacted with Angus
19 McQueen?
20 A. Never met him.
21 Q. How about Revan McQueen?
22 A. No.

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1 Q. Anybody by the name of Tony Makris?
2 A. Yes.
3 Q. Have you met Mr. Makris?
4 A. Yes.
5 Q. What context would you have met
6 Mr. Makris?
7 A. Board meetings, at events.
8 Q. Does Mr. Makris provide services for
9 the NRA as far as you know?
10 A. He did.
11 Q. Do you know what he was doing for
12 the NRA?
13 A. Under what, Western Skies, whatever
14 it was. Yes. He had a program.
15 Q. Beth knows the name of it, I'm sure.
16 And that program was something that
17 the NRA paid for?
18 A. Paid him for, yes.
19 Q. Paid him for those, producing those
20 programs?
21 A. Yes.
22 Q. What do you know about the NRATV

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1 program?
2 A. Not much.
3 Q. Do you know what kind of, is it your
4 understanding that Ackerman McQueen was producing
5 NRATV for the NRA?
6 A. Yes.
7 Q. And, is it your understanding that
8 the NRA was paying Ackerman McQueen for producing
9 NRATV?
10 A. Yes.
11 Q. Did you have any involvement in any
12 of the productions of NRATV?
13 A. None.
14 Q. Did you have any involvement in the
15 amounts of money or the invoices that Ackerman
16 McQueen billed the NRA for its services in
17 providing NRATV?
18 A. Not the amounts, no.
19 Q. If not the amounts, what would you
20 have been aware of?
21 A. Programming.
22 Q. And what would you have been aware

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1 of in terms of programming?
2 A. That the numbers Ackerman McQueen
3 said people were watching were not true.
4 Q. And how did you get that
5 information?
6 A. Through, it would have come from
7 Wayne. I don't know how he found out. But --
8 Q. So, these aren't, like, statistics
9 or reports that you yourself looked at, is that
10 correct?
11 A. They are not.
12 Q. This is something that you were,
13 essentially hearsay from Mr. LaPierre?
14 MR. COLLINS: Objection to form.
15 THE WITNESS: No.
16 BY MR. SCHERTLER:
17 Q. Well, I'm sorry, maybe hearsay is
18 the wrong word.
19 But, this is what Mr. LaPierre told
20 you he was aware of?
21 A. That's correct.
22 Q. And you have never investigated it

Page 221

1 yourself, personally?
2 A. No.
3 Q. Okay. Do you know Gail Stanford?
4 A. Yes.
5 Q. Who is she?
6 A. She runs a travel agency.
7 Q. And do you know, do you know the
8 name of the travel agency?
9 A. I do not.
10 Q. Have you ever used her travel
11 agency?
12 A. No.
13 Q. Not even for NRA-related travel?
14 A. Not that I'm aware of. I may have.
15 But, it, if it had been arranged for me by her.
16 I don't know.
17 Q. Are you aware of what, of any
18 contract or agreement that exists between the NRA
19 and Ms. Stanford?
20 A. No.
21 Q. So, you have never seen any kind of
22 agreement or contract?

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1 A. Have not.
2 Q. And as the first vice president or
3 the president, do you know whether you have ever
4 signed a contract with Ms. Stanford or with her
5 company?
6 A. I could have. I don't remember.
7 Q. That is fine.
8 A. Okay.
9 Q. If you don't remember, that is --
10 A. I don't.
11 Q. The, are you aware of what kind of
12 fee Ms. Stanford charges the NRA for her
13 services?
14 A. No.
15 Q. And you have never seen reports or
16 have no insight into that?
17 A. No.
18 Q. Do you know whether Gail Stanford's
19 charges related to NRA travel are billed through
20 Ackerman McQueen and then Ackerman McQueen
21 charges the NRA for that?
22 A. I do not.

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1 Q. Have you ever met her?
2 A. Yes.
3 Q. In what context would you have met
4 her?
5 A. At women's leadership luncheons. On
6 two occasions she actually sat at my table.
7 Q. Okay.
8 A. I have a vacant seat and that was
9 how I met her.
10 Q. Okay. We have talked a little bit
11 about Millie Hallow.
12 How long have you known Ms. Hallow?
13 A. As best as I remember since 1990.
14 Q. 1990?
15 A. Yes.
16 Q. Is that when she began working with
17 the NRA? Or was that before?
18 A. I don't know that. That was not the
19 capacity I met her in.
20 Q. What capacity did you meet her in?
21 A. I knew her husband.
22 Q. What was her husband -- she has had

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1 a couple of husbands.
2 A. Number four, Ralph Z. Hallow.
3 Q. And how did you know him?
4 A. Journalist.
5 Q. And so you met her independently of
6 the NRA?
7 A. Yes.
8 Q. Through her husband?
9 A. Yes.
10 Q. Are you aware of when she began
11 working with the NRA?
12 A. In the '90s, I don't know exactly
13 when.
14 Q. And is it fair to say you had no
15 involvement in her hiring with the NRA?
16 A. No.
17 Q. Did you ever become aware of the
18 fact that she had been convicted of a felony
19 embezzlement charge here in the District of
20 Columbia?
21 A. Yes.
22 Q. When did you become aware of that?

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1 A. I'm not sure of the date, but it
2 would have been at least ten years ago.
3 Q. How did you become aware of that?
4 A. She told me.
5 Q. Are you aware of situations in which
6 her personal expenses were being paid by the NRA?
7 MR. COLLINS: Objection to the form.
8 THE WITNESS: I am now.
9 BY MR. SCHERTLER:
10 Q. What are you aware of now, if you
11 can tell us?
12 A. That she did make a charge on her
13 NRA credit card.
14 Q. Do you know what that charge was
15 for?
16 A. Clothes.
17 Q. And do you know when that occurred?
18 A. I do not.
19 Q. Do you know if any action has been
20 taken against Ms. Hallow with respect to that
21 personal charge?
22 A. I do not know. I do not know if any

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1 action was or was not taken.
2 Q. Would it have been appropriate to
3 take some action against an employee who charged
4 personal expenses on an NRA charge card?
5 A. Well, that would have been up to
6 Wayne LaPierre and HR.
7 It is my understanding she paid it
8 back.
9 Q. Okay. We have talked a little bit
10 about Steve Hart.
11 What was your understanding as to
12 who Steve Hart represented?
13 A. The 76 board members.
14 Q. 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 5 million NRA
19 members?
20 Q. No, so --
21 A. What do you mean.
22 Q. So, for instance, let's talk about

Page 227

1 John Frazer for a minute.
2 Mr. Frazer is general counsel for
3 the NRA, correct?
4 A. Correct.
5 Q. And would Mr. Frazer advise NRA
6 management on legal issues?
7 A. Yes.
8 Q. Would, so, do you view Mr. Hart's
9 role as being counsel for the NRA board different
10 than Mr. Frazer's role as counsel for NRA
11 management?
12 MR. COLLINS: Objection to the form.
13 THE WITNESS: I perceive it as being
14 different.
15 BY MR. SCHERTLER:
16 Q. In the sense that Mr. Hart
17 exclusively advised the board on board issues?
18 A. Yes.
19 Q. And, are as a board member, did you
20 feel that you could seek advice from Mr. Hart?
21 A. Originally, yes. But, later, no.
22 Q. When you say later, no. What

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1 happened later?
2 A. In calls to me, if they were made
3 late in the day, his speech would often be
4 slurred.
5 I don't know that he was drinking.
6 But it sure sounded like it.
7 Q. So, you had some concerns about,
8 concerns about whether he would be competent
9 based on potentially an alcohol problem?
10 A. I, my perception was whether he was,
11 who his loyalty was to.
12 Q. Explain that to me, would you.
13 So, there is a difference between
14 maybe slurred speech later in the evening. I
15 think I'm guilty of that?
16 A. Maybe now.
17 Q. But, we are getting there.
18 But, the, there is a difference
19 between that, of what I could completely
20 understand, and then your concern about his
21 loyalty.
22 Could you explain about your concern

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1 about his loyalty?
2 A. Toward the end of his employment
3 with NRA, it became apparent to me that he was
4 not looking out for the best interests of NRA,
5 but, in fact, for Ollie North.
6 Q. What gave you that impression. Can
7 you tell us?
8 A. He talked badly about Brewer.
9 Started talking badly about Wayne.
10 Q. Can you be -- to the extent you are
11 able to, can you be a little bit more specific.
12 What did Mr. Hart say about
13 Mr. Brewer and then what did Mr. Hart say about
14 Mr. LaPierre?
15 A. I could, yes.
16 Q. Would you?
17 A. Yes.
18 Q. Thanks.
19 A. He, although he recommended the
20 Brewer firm to Wayne LaPierre for employment, he
21 in the later employment of Hart's career said
22 that he was charging too much, and that he

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1 thought he should go.
2 Q. Based upon the fact that Mr. Hart
3 came to a similar conclusion as Lieutenant
4 Colonel North that the Brewer firm was charging
5 too much?
6 A. Well, that is what he said. Yes.
7 Q. What about Mr. LaPierre?
8 A. He, in the last maybe two months
9 before he left, was saying that Wayne should go.
10 Q. Did he say that to you?
11 A. Yes.
12 Q. Did he say why he thought Wayne
13 should go?
14 A. He, yeah.
15 Q. What did he say?
16 A. That he felt like his time was past
17 and that he should go. And probably other things
18 that I don't remember.
19 Q. So, when you talk about somebody's
20 time passing, anything specifically about maybe
21 things that Mr. LaPierre wasn't doing correctly
22 or wasn't up to doing? Anything specific like

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1 that?
2 A. In my mind?
3 Q. From what he, from what Mr. Hart
4 told you.
5 A. I don't understand. Not that I
6 recall.
7 Q. Okay. Mr. Hart was terminated as
8 legal counsel for the board. Is that correct?
9 A. Correct.
10 Q. Do you know why?
11 A. He was not representing the best
12 interest of the 76 board members, but maybe the
13 best interest of a couple.
14 Q. Who made the decision to terminate
15 Mr. Hart?
16 A. I don't know. I don't know.
17 Q. Was the board, did the board approve
18 that decision?
19 A. Did not have to. No.
20 Q. So, the board did not approve that
21 decision then.
22 Did, was it Mr. LaPierre who decided

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1 to terminate Mr. Hart?
2 A. I believe so.
3 Q. Were you consulted?
4 A. Yes.
5 Q. And, by Mr. LaPierre?
6 A. Yes.
7 Q. And about terminating Mr. Hart?
8 A. Yes.
9 Q. Before the decision was made?
10 A. Yes.
11 Q. And what was your response to
12 Mr. LaPierre?
13 A. I agreed to terminate.
14 Q. Have -- I think there was a
15 reference to, I think you acknowledged that you
16 had a number of meetings with the representatives
17 of the Brewer law firm?
18 Is that fair to say?
19 A. Yes.
20 Q. Without going into the discussions,
21 but, what would have been the nature of those
22 meetings? What would the purpose of those

Page 233

1 meetings have been?
2 A. Updates on lawsuits.
3 Q. Did you ever meet Mr. Brewer
4 personally?
5 A. Yes.
6 Q. How many times have you met
7 Mr. Brewer?
8 A. Many.
9 Q. Mr. Brewer does not represent you in
10 your personal capacity in any way, does he?
11 A. No.
12 Q. As the president, current president
13 of the NRA, are you aware of the investigation
14 that is being conducted by the New York State
15 Attorney General with respect to the NRA?
16 A. Yes.
17 Q. And are you aware of the fact that
18 the NRA has received a number of subpoenas for
19 documents from the New York State Attorney
20 General, correct?
21 A. Yes.
22 Q. And, what is your understanding of

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1 the nature of that investigation if you know?
2 A. Harassment.
3 Q. That is what every client says.
4 Do you know what they claim they are
5 investigating?
6 A. Yes.
7 Q. What is it?
8 A. It would be having to do with being
9 the (c)(4).
10 Q. So, whether you are doing what the
11 rules and regulations, whether the NRA is doing
12 what the rules and regulations require in order
13 to maintain that 501(c)(4) status?
14 A. Correct.
15 Q. Is that correct. Have you been
16 interviewed by the New York State Attorney
17 General?
18 A. No.
19 Q. Do you know of other people within
20 the NRA that have been interviewed by the New
21 York State Attorney General?
22 A. No.

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1 Q. So, I'm getting close to the end
2 here.
3 What I would like to ask you about
4 is, it has to do with the lawsuit now that has
5 been filed.
6 So, I'm not going to ask you to read
7 this, but I just want to show it to you so you
8 know what I'm talking about.
9 A. Thank you.
10 Q. I am still having a hard time
11 reading it.
12 This would be Exhibit 20.
13 (Meadows Exhibit Number 20
14 marked for identification.)
15 BY MR. SCHERTLER:
16 Q. So, I think what I can represent is
17 that this is, as you can see, it is titled First
18 Amended Complaint.
19 And this is actually, I think we
20 could all agree, it is a revised version of the
21 first lawsuit that was filed against Ackerman
22 McQueen.

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1 Just, have you ever read this
2 document?
3 A. I have looked at it. I have not
4 really, no.
5 Q. And, my understanding is that the
6 first, this first lawsuit relates to a claim that
7 Ackerman McQueen did not provide documents and
8 records for the NRA to examine as it is required
9 to under its services agreement.
10 Is that, is that, would that be
11 compatible with your understanding of it?
12 A. Yes.
13 Q. And do you have any knowledge about
14 the process that occurred where the NRA was
15 requesting information from Ackerman McQueen and
16 there were audits conducted of Ackerman McQueen
17 in 2018 and 2019?
18 A. Yes.
19 Q. What knowledge do you have?
20 A. I know that documents were requested
21 and were not given.
22 Q. And how do you know that?

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1 A. I mean, it was general knowledge.
2 And it would have been discussion amongst the
3 officers. From Frazer, and even, at some point
4 even Steve Hart.
5 Q. So, were you ever involved in making
6 requests for information from to Ackerman
7 McQueen?
8 A. Never.
9 Q. And were you ever involved in
10 reviewing information that Ackerman McQueen was
11 providing?
12 A. No.
13 Q. So, you never personally were
14 involved in that process; is that fair to say?
15 A. That is fair.
16 Q. What you are --
17 The basis of your knowledge about
18 this is learning it from other officers or
19 management within the NRA.
20 A. Yes.
21 Q. Did you ever make any request to
22 review the Lieutenant Colonel North's contract

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1 with Ackerman McQueen?
2 A. No.
3 Q. Are you aware of who at the NRA was
4 actually able to review or read that contract?
5 A. General counsel would have.
6 Q. Mr. Frazer?
7 A. Yes.
8 Q. Could I show you Exhibit 21.
9 (Meadows Exhibit Number 21
10 marked for identification.)
11 BY MR. SCHERTLER:
12 Q. So, again, hoping, hopefully there
13 is no objection, but this is the second lawsuit
14 that the NRA had filed against Ackerman McQueen
15 in the Circuit Court for the City of Alexandria.
16 And I think you could see from the
17 first page it appears to have been filed on
18 May 22nd of 2019. Are you familiar, have you
19 ever read through this lawsuit?
20 A. No.
21 Q. Okay. And are you -- so, is it fair
22 to say you are not familiar with the allegations

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1 that are contained in this lawsuit?
2 A. I don't know that.
3 Q. If I were to tell you that the
4 lawsuit alleges that certain people at Ackerman
5 McQueen, or associated with the Ackerman McQueen
6 deliberately leaked confidential information to
7 the press or third parties, in violation of the
8 services agreement, would that comport with your
9 understanding of allegations the NRA has made
10 against Ackerman McQueen?
11 A. It would.
12 Q. And again, could I just go back to
13 the question I asked earlier.
14 Do you have any personal knowledge
15 about any individuals at Ackerman McQueen or
16 associated with Ackerman McQueen leaking
17 information to the press or to third parties?
18 A. I'm told that they did. I don't, I
19 have no knowledge of who.
20 Q. And who told you that they did?
21 A. I, it would have been general
22 knowledge. When we have discussions with the

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1 officers.
2 Q. But, is there anybody that has ever
3 said we've got hard evidence, e-mails, witnesses,
4 that have, will actually say that Ackerman
5 McQueen leaked this information to the press?
6 A. I don't know that.
7 Q. Okay. Finally, are you aware of the
8 fact that the third complaint was filed in
9 Alexandria Circuit Court by the NRA against the
10 Ackerman McQueen requesting the return of NRA
11 property?
12 A. Yes.
13 Q. Do you know what the property it is
14 that the NRA wants back?
15 A. I did, but I don't know now.
16 Q. Do you still want it back?
17 A. Yes.
18 Q. And, are you aware that the services
19 agreement requires that the NRA pay Ackerman
20 McQueen in advance for any costs associated with
21 the return of that property?
22 A. No.

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1 Q. You are not aware of that?
2 A. I'm not.
3 Q. Okay. Are you aware of the fact
4 that the NRA had filed a lawsuit against
5 Lieutenant Colonel North in New York State?
6 A. Yes.
7 Q. And do you know what that lawsuit
8 was about?
9 A. Generally -- no. I would say no.
10 Q. In that lawsuit -- just bear with me
11 a moment.
12 In that lawsuit, it contends that
13 there are text messages and e-mail messages that
14 demonstrate that another errant NRA fiduciary,
15 Chris Cox, once thought by some to be a likely
16 successor for Mr. LaPierre, participated in the
17 Ackerman-North-Boren conspiracy.
18 Are you aware of that allegation
19 that the NRA made in the North lawsuit?
20 A. Yes.
21 Q. What do you know about Chris Cox
22 being part of a Ackerman-North-Boren conspiracy?

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1 A. At 4 o'clock on April 24th, at the
2 request of Chris Cox, Wayne LaPierre and I met
3 with him and he pretty much parroted what Dan
4 Boren had said earlier in the day, and what Ollie
5 North had said.
6 And for about 25 minutes, he was
7 telling Wayne why he should resign. And that if
8 he didn't, everything that he had done in his
9 38 years at NRA would be smeared in every paper
10 in the country. And, he has, his family would be
11 humiliated.
12 Q. And so that was the, and so, where
13 did Mr. Cox get this information? Did he say?
14 A. What do you mean, what information?
15 Q. So, when he was providing
16 information in this 25-minute conversation about
17 the bad things that would happen to Wayne
18 LaPierre, where did Mr. Cox on obtain the
19 information? Did Mr. Cox say where he obtained
20 the information that he was saying would hurt
21 Mr. LaPierre?
22 A. He did not say.

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1 Q. But, if that was the same day, he
2 was not fired?
3 A. He quit.
4 Q. But he didn't quit until two months
5 later.
6 MR. COLLINS: Is there a question?
7 THE WITNESS: Are you asking me?
8 BY MR. SCHERTLER:
9 Q. Let me think about it.
10 The -- do you know when Mr. Cox
11 resigned?
12 A. I don't know the date. No.
13 Q. Do you know why Mr. Cox resigned?
14 A. Because the scheme he had been
15 involved in failed.
16 Q. So, why did that mean he had to
17 resign?
18 A. It didn't. He chose to.
19 Q. Do you know whether he was pressured
20 or forced to leave?
21 A. I know that he was not.
22 Q. Do you know whether he entered into

Page 244

1 a separation or severance agreement with the NRA
2 when he left?
3 A. He had an agreement.
4 Q. Does he no longer have the
5 agreement?
6 A. He does, but it, yes, he does have
7 it.
8 Q. Is there a dispute about the
9 agreement at this point?
10 A. Yes.
11 Q. Can you tell me the nature of that
12 dispute?
13 A. I cannot.
14 Q. Because you don't know?
15 A. Well, it would be privileged.
16 Q. And if it is privileged then don't
17 tell me.
18 Would you mind if we took just five
19 minutes and, you know, let me see if there is
20 anything else I need to ask.
21 A. Sure.
22 Q. And Mr. Dickieson may have some

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1 questions.
2 MR. COLLINS: Sure.
3 (Recess taken -- 3:53 p.m.)
4 (After recess -- 4:08 p.m.)
5 EXAMINATION
6 BY MR. DICKIESON:
7 Q. Ms. Meadows, my name is David
8 Dickieson. Today I am representing the Mercury
9 Group which is the second defendant in this case.
10 I have a few more questions.
11 First, you are president of the
12 National Rifle Association, correct?
13 A. Correct.
14 Q. There was some confusion about when
15 you first became the interim president right
16 after Mr. Brownell was president. Do you
17 remember the first date that you first became the
18 interim president?
19 A. Yes.
20 Q. When was that?
21 A. May.
22 Q. Of 2018?

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1 A. Uh-huh.
2 Q. And what were you told at that time
3 why you were becoming the interim president?
4 A. I was told Colonel North needed time
5 to get his finances in order.
6 Q. Okay. And, how long did they tell
7 you you would be the interim president?
8 A. They speculated two months.
9 However, it wound up being four.
10 Q. Okay. And, during that time period,
11 you were called the President of the National
12 Rifle Association; is that right?
13 A. Right.
14 Q. And you had the responsibilities of
15 president at that time. Correct?
16 A. Yes.
17 Q. And the president has been a, sort
18 of well recognized position, known nationwide.
19 Charlton Heston was the president of the NRA,
20 correct?
21 A. Correct.
22 Q. Oliver North was a national figure

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1 who was the president of the NRA; is that right?
2 A. Right.
3 Q. And Pete Brownell is the owner of a
4 major manufacturing facility; he was president
5 right before you became interim president,
6 correct?
7 A. Correct.
8 Q. So, I wanted to go through your
9 background.
10 You are stepping into this position.
11 What is it that the NRA saw in you to step into
12 this very visible nationwide position?
13 MR. COLLINS: Objection to the form.
14 THE WITNESS: So, loyalty. I have
15 extensive political background.
16 NRA has, as you know, great
17 political presence.
18 So, I would say those two things.
19 I have chaired other boards.
20 BY MR. DICKIESON:
21 Q. And what boards have you chaired?
22 A. The Stone Mountain Memorial

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1 Association in Georgia, as appointed by the
2 governor.
3 I currently do not hold any other
4 chairmanships. I am vice president of another.
5 Q. What entity is that?
6 A. American Conservative Union.
7 Q. And what other boards have you
8 served on in the past apart from the NRA?
9 A. The Republican National Committee.
10 I was national committeewoman for Georgia for
11 12 years.
12 Republicans Abroad. Counsel on
13 National Policy. Those would be current.
14 Q. Okay. And in your role, both back
15 in 2018 when you were the interim president and
16 now when you are the president, have you received
17 any threats because of your position with the
18 NRA?
19 A. Yes.
20 [REDACTED]
21 [REDACTED]
22 [REDACTED].

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 MR. DICKIESON: All right,
7 Ms. Meadows, while we were off the record we
8 agreed, I will withdraw that last question.
9 We are going to live with the protective
10 order as it stands. And I will move on to
11 the next question, which I don't think will
12 be involving issues that relate to your
13 personal security measures.
14 MR. COLLINS: Just take your time,
15 let him finish first and give me an
16 opportunity, in case I need to. Hopefully
17 not.
18 THE WITNESS: Okay.
19 BY MR. DICKIESON:
20 Q. Do you know what the cost of Wayne
21 LaPierre's security measures cost the NRA?
22 A. No.

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1 Q. Are you aware that over, that his
2 private jet travel costs over [REDACTED] per
3 year?
4 A. Yes.
5 Q. And do you know approximately what
6 that figure is on an annual basis?
7 A. I have seen the number. I can't
8 tell you that number.
9 Q. Okay. [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 BY MR. DICKIESON:
15 Q. So, it would be zero for you?
16 A. I would say so.
17 Q. Okay.
18 A. I do that by choice, too.
19 Q. Okay. So you are brave.
20 Let me go back a little further. We
21 got your board representation history.
22 And I think you testified that none

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1 of those boards pay you anything for your
2 services; is that correct?
3 A. Correct.
4 Q. What is your educational background?
5 A. High school and some college.
6 Q. And where --
7 A. I did not graduate.
8 Q. Where did you attend college?
9 A. Well, I've got scattered; Georgia
10 State.
11 Q. Okay. That is the main place where
12 you have received the most credits, I guess; is
13 that right?
14 A. I guess, yes.
15 Q. And what other colleges do you
16 attend?
17 A. Actually, I did some pick up in
18 Kennesaw State, Troy, I don't know if it was Troy
19 State. That was a lot of years ago.
20 And that is pretty much it. Some
21 other non-consequential stuff.
22 Q. Did do you know how many years of

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1 credit you received in your college career?
2 A. I do not. Not a lot.
3 Q. Okay. And, what is the first paying
4 job you had after high school?
5 A. Very briefly Southern Bell for two
6 months and then Lockheed-Georgia.
7 Q. For how long?
8 A. Well, right after high school for
9 two years. And the reason I didn't continue
10 school, I got married.
11 And then in the '80s I went back to
12 work at Lockheed. I was part-time, basically
13 three days a week and wound up with 17 years.
14 Piecing it together.
15 Q. And, was that full-time or part-time
16 for those 17 years?
17 A. It was part-time. And I could
18 pretty much choose my schedule three days a week.
19 Q. Three days a week?
20 A. Yes.
21 Q. And, so what years did that cover?
22 A. I can't tell you -- I retired

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1 in '94. But, I don't remember the start date.
2 Q. But you said it was about 17 years?
3 A. Well, but it was cumulative. I
4 mean, three days a week, sometimes I would work
5 all week.
6 Q. And, you are retired from
7 Lockheed-Georgia?
8 A. Yes.
9 Q. Is this affiliated with Lockheed
10 Martin now?
11 A. Yes.
12 Q. Okay.
13 A. When I was there it was just
14 Lockheed-Georgia.
15 Q. Okay. And, so did you retire with a
16 paid retirement plan?
17 A. Yes.
18 Q. And that is still paying you?
19 A. No. It is paid out.
20 Q. Paid out. And when did that
21 complete?
22 A. Two years ago.

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1 Q. Okay. And are you still married to
2 the person you married when you were very young?
3 A. Yes.
4 Q. Congratulations.
5 And --
6 A. Good men are hard to find. I hold
7 onto mine.
8 Q. And, you said you worked part-time.
9 Is that because you had children?
10 A. It actually, it was that job was
11 offered to me. And, it overlapped with my board
12 duties, Republican National Committee.
13 So, it fit well.
14 I had been offered full employment
15 and turned it down.
16 Q. Okay. So, did you have children?
17 A. Three sons.
18 Q. Three sons.
19 A. I, if I could remember when they
20 started college, I had three sons in college with
21 the three-year overlap.
22 So, having employment then was a

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1 gift.
2 Q. And so you are working three days a
3 week at Lockheed-Georgia and you are also working
4 for the Republican National Committee, how many
5 hours a week?
6 A. It would not be measured that way.
7 Q. Okay.
8 A. I didn't work for them. I was the
9 national committeewoman.
10 Q. Okay. And, what work did your
11 husband do?
12 A. He was management at Lockheed.
13 Q. Okay.
14 A. An aeronautical engineer that went
15 into management.
16 Q. Is he retired now?
17 A. Yes.
18 Q. When did he retire?
19 A. '97.
20 Q. Does he serve on any boards?
21 A. Not now.
22 Q. Is he involved in Republican

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1 politics?
2 A. Only as a voter.
3 Q. He is a voter. That is good
4 involvement.
5 A. He is involved. He pushes me. And
6 tolerates me.
7 Q. And, so, how much time do you devote
8 to the NRA currently?
9 A. I can't really measure it. But, I
10 would say there is not a day that goes by
11 including Christmas, New Years, that I don't do
12 something related to it, a phone call or prep for
13 something.
14 Q. Okay. And, you have testified
15 earlier that every NRA contract, greater than
16 \$100,000 you have to sign off on. Is that
17 correct?
18 MR. COLLINS: Objection to the form.
19 THE WITNESS: Two of the three
20 officers, president and the two vice
21 presidents, must sign off.
22 BY MR. DICKIESON:

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1 Q. Okay. So, Mr. LaPierre is one of
2 those officers.
3 A. No. It would be me, first vice
4 president, second vice president.
5 He does sign off on all of them.
6 Q. Okay. And who are the other two
7 vice presidents at present?
8 A. First vice president Charles Cotton.
9 Second vice president Willes, W-I-L-L-E-S, Lee.
10 Q. And, are they located in the
11 Washington, D.C. area?
12 A. Lee is. Colonel Lee. Alexandria, I
13 think would be his address.
14 At any rate, he is in Virginia.
15 Q. What about Charles Cotton?
16 A. He is Texas, near Houston.
17 Q. And, so, do you sign off on most of
18 the contracts over \$100,000?
19 A. I have signed off on all of them
20 that has come my way.
21 Generally, and I believe always, all
22 three of us do sign.

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1 Q. Generally all three sign?
2 A. Yes.
3 Q. And, we have heard testimony that
4 the Brewer Law Firm has separate contracts for as
5 many as 12 different areas of legal work.
6 Have you signed off on each of those
7 12 retainer agreements?
8 A. No. We, we do not sign off on
9 those.
10 Q. And why is that?
11 A. It is not required by the bylaws.
12 Q. If, do the bylaws carve out an
13 exception for retainer agreements for law firms?
14 A. I, not that I'm aware of. But, that
15 is how it is done.
16 Q. Is it your understanding that those
17 retainer agreements are for less than [REDACTED]
18 A. That is not my -- no. I would not
19 think that.
20 Q. So, what is your understanding of
21 why those would be outside of the regular rules?
22 MR. COLLINS: Objection to the form.

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1 Go ahead.
2 THE WITNESS: Because the EVP does
3 the hiring of law firms. And it is, it is
4 just being done that way. I don't know why.
5 But I do know it is not carved out.
6 It has a lot of -- those contracts
7 have a lot of eyes on it.
8 BY MR. DICKIESON:
9 Q. Okay. And who would those, who
10 would possess those eyes?
11 A. Craig Spray, the treasurer. And
12 John Frazer, secretary and legal counsel.
13 Q. Anyone else?
14 A. Probably. But, those I know.
15 Q. What about the hiring of the firm
16 Briglia Hundley.
17 Did you sign off on that retainer
18 agreement?
19 A. Did not.
20 Q. And for the same reason that that is
21 a law firm and that is treated differently by the
22 NRA?

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1 A. Correct.
2 Q. Have you had any discussions with
3 Craig Spray about legal fees charged by the
4 Brewer Law Firm?
5 A. I have not.
6 Q. Have you had any discussions with
7 Craig Spray about bills issued by Ackerman
8 McQueen?
9 A. No.
10 Q. Do you have any regular interaction
11 with Mr. Spray?
12 A. No.
13 Q. Do you have any interaction with
14 people in the treasurer's office?
15 A. No.
16 Q. And why is that?
17 A. The capacity of president, I would
18 not. Being a member of the Audit Committee, they
19 always report to us. In that capacity I would.
20 Q. Okay.
21 A. If I have questions, Craig Spray
22 would immediately respond an answer.

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1 Q. During an Audit Committee meeting?
2 A. Well, not phone call. He would
3 necessarily be there.
4 Q. Okay --
5 A. But, for instance, I called him
6 recently about, to find out if a particular thing
7 would be line item in the budget.
8 And, I mean, he is very responsive.
9 And I just don't have need to talk to him.
10 Q. When you are approving a contract,
11 are you provided information that the NRA can
12 afford this contract?
13 A. Yes.
14 Q. And who provides that information to
15 you?
16 A. That would be through Treasurer's
17 Office.
18 Q. And do they send you written reports
19 saying here is our current financial status?
20 A. No. The cover sheet on the contract
21 would have their signature.
22 Q. I'm going to show you what we will

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1 have marked as the next exhibit, what are we up
2 to?
3 MS. PINTO: Let's do 19.
4 BY MR. DICKIESON:
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 (Meadows Exhibit Number 19
9 marked for identification.)
10 BY MR. DICKIESON:
11 Q. Now you just testified about a cover
12 sheet on a contract.
13 Is this business case analysis the
14 sort of cover sheet that you are referring to?
15 A. No.
16 Q. How does this differ from what you
17 are talking about?
18 A. It would have the names from the
19 number of people that would be signed out.
20 Wayne LaPierre, Craig Spray, John
21 Frazer, president, first, second vice president.
22 Q. And so if you look at the, I guess

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1 it is about the 7th page?
2 A. Okay. Here it is. That would be
3 it.
4 Q. And I am sorry, these pages aren't
5 numbered.
6 But, it is the head of that seven
7 pages is Contract Review Signature Sheet.
8 That is what you are referring to;
9 is that right?
10 A. That's correct.
11 Q. And, you said that there is some
12 sort of analysis that the NRA can afford this
13 particular contract.
14 Where would that be on this cover
15 sheet?
16 A. I said what? Analysis?
17 Q. My question that you answered
18 previously was that, how do you know when you are
19 approving a contract that the NRA can afford to
20 pay it?
21 A. Because Craig Spray signed it.
22 Q. So his signature is the proof that

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1 you are looking for?
2 A. Yes.
3 Q. Okay. Do you ask questions when you
4 receive one of these contract review signature
5 sheets?
6 A. Very frequently.
7 Q. Frequently?
8 A. Yes.
9 Q. And what sort of questions do you
10 typically ask?
11 A. Just, I read all of the contracts.
12 I don't always understand.
13 If there is anything in there that
14 jumps out, I would call John Frazer. And a
15 couple of times, actually I have called Craig
16 Spray.
17 Also my first vice president, who is
18 an attorney, and he reviews them very thoroughly.
19 And the, me, first, second vice presidents, very
20 frequently discuss the contracts before signing.
21 Q. Okay. Are you familiar with -- I,
22 there is, your signature is not on this contract

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1 review signature sheet. Is that correct?
2 A. That's correct.
3 Q. That is because this is just before,
4 well before you became president; is that right?
5 A. Yes.
6 Q. And what was the date that you
7 became president?
8 A. Actually it is '19.
9 Q. That is '19. So, you became
10 president after the April meeting in March, or
11 April of 2019. Is that correct?
12 A. Correct.
13 Q. Are you familiar with Ms. Stanford's
14 contract at all?
15 A. Some.
16 Q. As the president, were you aware
17 that she was receiving just a flat amount of
18 [REDACTED] annually to be available to supply
19 travel services?
20 A. Not until I became president.
21 Q. And, who made you aware of that?
22 A. I don't remember. I don't recall.

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1 Q. Do you know if there were any
2 competitive bids for this particular service?
3 A. I do not.
4 Q. Is that a typical practice by the
5 NRA that they would seek competitive bids for
6 services?
7 A. Normally, that would occur.
8 Q. And, do you know if Ms. Stanford and
9 her business group receive commissions on the
10 travel that they book?
11 A. I do not know.
12 Q. Do you know travel agents receive
13 commissions typically?
14 A. No.
15 Q. You don't know that or --
16 A. No, I don't deal with them.
17 Q. Okay.
18 A. I do not know.
19 Q. You have arranged for your own
20 travel?
21 A. No.
22 Q. Who does your travel arrangements?

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1 A. Nick Perrine who works with the
2 president's office.
3 Q. Okay.
4 A. He makes those.
5 Q. Is there a travel agent for other
6 NRA people apart from Wayne LaPierre?
7 A. Yes.
8 Q. Who is that?
9 A. It is, they have changed names. I
10 can look at my phone and tell you.
11 I don't deal with them. So ...
12 Q. You deal with Nick Perrine?
13 A. Correct.
14 Q. Do you know if he then forwards that
15 to --
16 A. The travel agent, yes.
17 Q. He does forward them. Your request
18 for travel go to Nick and then he forwards it to
19 the other --
20 A. He knows all of my travel. He
21 arranges it, and actually makes the reservations.
22 Q. Okay. And it is to your

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1 understanding that the GS2 Enterprise is owned by
2 the Stanfords, only provides, for that [REDACTED]
3 per year stipend, only arranges for travel for
4 Wayne LaPierre and his people that travel with
5 him. Is that right?
6 A. I have heard that. I do not know it
7 for a fact.
8 Q. Has that, has Ms. Stanford's travel
9 arrangements been addressed by the Audit
10 Committee?
11 A. At one point it was signed off on.
12 Q. When was that?
13 A. I don't know.
14 Q. How long have you served on the
15 Audit Committee?
16 A. For a year and a half. I went on in
17 July of 2010.
18 Q. And I believe you testified that the
19 Audit Committee has responsibility for hiring
20 examiners, auditors?
21 A. Yes.
22 Q. And, were you aware that there were

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1 examiners hired to look at the books of Ackerman
2 McQueen in September of 2018?
3 MR. COLLINS: Objection to the form.
4 THE WITNESS: Restate.
5 BY MR. DICKIESON:
6 Q. Were you aware that the NRA
7 exercised its rights under the examination
8 provision of its contracts and said that we want
9 to look at Ackerman McQueen's books in the fall
10 of 810.
11 A. Yes.
12 Q. And, was that, was, was the Audit
13 Committee involved in hiring the company that
14 went in to look at those books?
15 A. Not that I recall. I, I don't know,
16 I don't know that.
17 Q. Do you know who was responsible for
18 hiring that, the people that went in and looked
19 at those books?
20 A. Do I not.
21 Q. Do you know why that would not have
22 been within the jurisdiction of the Audit

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1 Committee?
2 A. It could have been. I don't know
3 that it was not.
4 Q. But you were on the Audit Committee
5 in the fall of 2018.
6 A. In 810.
7 MR. COLLINS: You are talking over
8 each other.
9 BY MR. DICKIESON:
10 Q. Is that right?
11 A. Yes.
12 Q. Okay. But you don't remember
13 anything about hiring someone to go look at the
14 Ackerman McQueen's books?
15 A. I do not.
16 Q. Okay. What about in February,
17 January and February of 2019, was the Audit
18 Committee involved in hiring anyone to go in and
19 look at Ackerman McQueen's books?
20 A. Not that I recall.
21 Q. Do you know, do you know if there
22 was an examination of Ackerman McQueen's books in

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1 February and March of 2019?
2 A. I do not believe there was.
3 Q. You are not aware of a nine-day
4 examination of Ackerman McQueen's books during
5 that time period?
6 A. No. No.
7 Q. Have you heard of the company
8 Forensic Risk Alliance?
9 A. No.
10 Q. Are you aware that the NRA paid over
11 \$300,000 to Forensic Risk Alliance to look at the
12 books of Ackerman McQueen?
13 A. I don't recall.
14 Q. Were you ever asked to sign off on
15 any contract with Forensic Risk Alliance?
16 A. I perhaps was. I don't recall.
17 Q. Okay. Did you ever receive any
18 report of the results of a review by Forensic
19 Risk Alliance?
20 A. As president?
21 Q. Yes.
22 A. No.

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1 Q. Have you ever asked to see any of
2 the examination results for any examination of
3 Ackerman McQueen's books?
4 A. No.
5 Q. Do you have a view that Ackerman
6 McQueen did not cooperate in those examinations?
7 A. Yes.
8 Q. And what is your view?
9 A. Going back a year when we asked, got
10 them to show billing records, we did not get
11 those.
12 Q. What time period are you talking
13 about?
14 A. 2018, 2019, and I would say in April
15 of 2019 we did get records to look at.
16 Q. How do you know that?
17 A. It actually was common knowledge for
18 the officers.
19 Q. And is that because there were
20 meetings where you had discussed Ackerman
21 McQueen's failure to provide records?
22 A. There would not have been meetings.

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1 No.
2 Q. How did that become common knowledge
3 without meetings?
4 A. It would have come through Wayne
5 LaPierre, John Frazer, Craig Spray.
6 Q. And so do you recall having
7 discussions with those three all at one time or
8 separately about Ackerman McQueen's providing
9 records?
10 A. Separately. Except for first and
11 second VP, the three of us have discussed.
12 Q. Okay. So what did Craig Spray tell
13 you about Ackerman McQueen's providing records?
14 A. Actually, he was not the one who
15 really went into depth.
16 It would have been John Frazer.
17 Q. And, what did John Frazer tell you?
18 A. That --
19 MR. COLLINS: Objection. Privilege.
20 BY MR. DICKIESON:
21 Q. Is --
22 A. Well --

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1 Q. So, he has instructed you not to
2 answer.
3 A. Yes.
4 Q. So, I'm going to ask you another
5 question.
6 Was he providing you with legal
7 advice at the time that he gave you this
8 information?
9 A. No.
10 Q. Could you then answer the question
11 what did he tell you?
12 MR. COLLINS: Can we just take a
13 second.
14 MR. HUNDLEY: Just because it is
15 legal advice doesn't mean it is not connected
16 to attorney/client privilege and the future
17 legal services that might come.
18 MR. COLLINS: Right. So, and what
19 was the question again? I'm sorry. Do you
20 know what the question was?
21 MR. DICKIESON: What did he tell you
22 about the Ackerman McQueen providing records?

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1 MR. SCHERTLER: I think it is just
2 factual information coming from the attorney
3 would not be privileged.
4 MR. COLLINS: But again it depends
5 how he learned it and it may not be
6 actually -- it could include opinion not just
7 fact. So, if we want to take a little break
8 I will ask her.
9 MR. SCHERTLER: Sure.
10 MR. DICKIESON: Off the record.
11 (Recess taken -- 4:45 p.m.)
12 (After recess -- 4:47 p.m.)
13 BY MR. DICKIESON:
14 Q. All right. So, you are prepared to
15 answer the question. The information that
16 Mr. Frazer gave to you about Ackerman McQueen's
17 records.
18 A. The only information he gave me was
19 that he, in fact, did look at the records.
20 Q. And what did he say?
21 A. That was it. That he looked at
22 them.

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1 Q. So, does that contradict your prior
2 statement that Ackerman McQueen did not make
3 their records available?
4 MR. COLLINS: Objection to the form.
5 THE WITNESS: Not at all. Earlier
6 they did not make them available.
7 BY MR. DICKIESON:
8 Q. Okay. When was this conversation
9 with Mr. Frazer?
10 A. I don't recall.
11 Q. Was it before the lawsuit was filed?
12 A. I don't know. It would have been
13 probably late April, May.
14 Q. After you became president?
15 A. Probably.
16 Q. Okay. And you became president
17 after the first suit was filed. Is that right?
18 A. Yes.
19 Q. So, did Mr. Frazer tell you that he
20 actually saw the records of Ackerman McQueen
21 himself or that he hired someone to do it?
22 A. He actually saw.

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1 Q. Okay. Did Mr. Frazer mention
2 anything about Forensic Risk Alliance or FRA?
3 A. No.
4 Q. Did Mr. Frazer mention that he also
5 had seen the Oliver North contract?
6 A. I don't recall that.
7 Q. When is, what is the time period
8 when you first believe that Ackerman McQueen was
9 resistant to providing records to the NRA?
10 A. I can't give you an exact date.
11 But, for most of 2019 I would say.
12 Q. How about during 2018, was there a
13 similar problem?
14 A. Not that I recall.
15 Q. Okay. And, do you know why the NRA
16 continued to pay invoices when you have the
17 belief that they are not, that Ackerman McQueen
18 is not providing sufficient information to back
19 up those invoices?
20 A. No.
21 MR. COLLINS: Objection to form.
22 BY MR. DICKIESON:

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1 Q. Your answer was no?
2 A. Correct.
3 Q. Are you aware that the NRA has the
4 ability to question the invoices under the
5 contract?
6 A. Yes.
7 Q. Do you know if the NRA exercised
8 that right to question invoices?
9 A. I do know that during Woody Philips
10 term they did not.
11 Q. Do you know why they did not?
12 A. I don't.
13 Q. Is it your understanding that
14 Mr. Philips was somehow in cahoots with Ackerman
15 McQueen?
16 MR. COLLINS: Objection to the form.
17 THE WITNESS: I have no knowledge of
18 that.
19 BY MR. DICKIESON:
20 Q. Cahoots is a legal term. Do you
21 know, you don't have no idea why Mr. Philips did
22 not question the Ackerman McQueen invoices?

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1 A. I do not.
2 Q. Do you know if he was instructed to
3 not question them by Wayne LaPierre?
4 A. I don't know that.
5 Q. Do you know if Wayne LaPierre was
6 protective of the Ackerman McQueen invoices
7 during the Woody Philips treasurer era?
8 MR. COLLINS: Objection to the form.
9 THE WITNESS: That would be a
10 supposition. No, I don't.
11 BY MR. DICKIESON:
12 Q. And earlier you testified as to your
13 understanding of why it is okay for Mr. LaPierre
14 to bill things to Ackerman McQueen and then have
15 Ackerman McQueen bill the NRA.
16 Do you have any understanding that
17 that was done for confidentiality reasons?
18 MR. COLLINS: Objection to the form.
19 THE WITNESS: No.
20 BY MR. DICKIESON:
21 Q. Was it done for security reasons?
22 A. I don't know that.

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1 Q. Do you know if Mr. LaPierre is
2 secretive about his expenses?
3 MR. COLLINS: Objection to the form.
4 THE WITNESS: I have no reason to
5 believe one way or the other.
6 BY MR. DICKIESON:
7 Q. Do you think that the fact that he
8 was billing his personal, or his clothing
9 expenses through Ackerman McQueen is a reason to
10 believe he might be secretive about it?
11 MR. COLLINS: Objection to the form.
12 THE WITNESS: Well, number one, your
13 question, I don't agree with.
14 BY MR. DICKIESON:
15 Q. Okay. Let's go to Exhibit 114 that
16 was already introduced -- excuse me, 14.
17 MS. PINTO: A.
18 BY MR. DICKIESON:
19 Q. 14A. Do you have that in your stack
20 there?
21 If you look at the second page of
22 this article it quotes William A. Brewer, III,

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1 and it says in the third paragraph that
2 Mr. Brewer said "Certain fund-raising and travel
3 expenses were routed through Ackerman McQueen for
4 'confidentiality and security purposes.' But the
5 practice has since been modified."
6 Do you disagree with what Mr. Brewer
7 is saying, that the reasons for routing expenses
8 through Ackerman McQueen were for confidentiality
9 and security purposes?
10 A. Yes.
11 Q. And so what is your understanding of
12 why they were routed through Ackerman McQueen?
13 MR. COLLINS: Objection to the form.
14 THE WITNESS: For that purpose.
15 Confidentiality and security.
16 BY MR. DICKIESON:
17 Q. I thought your answer was you
18 disagreed with that.
19 You agree with what Mr. Brewer is
20 saying; is that right?
21 A. That's correct.
22 Q. And so what is the security purpose

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1 of routing his clothing expense through Ackerman
2 McQueen?
3 MR. COLLINS: Objection to the form.
4 THE WITNESS: He didn't route it
5 through. Ackerman McQueen laid out the plan
6 for him.
7 They made the appointment. And
8 arranged for him to go.
9 He didn't even see the bill.
10 And he told me that.
11 BY MR. DICKIESON:
12 Q. When did he tell you that?
13 A. Sometime in the past year.
14 Q. Did he tell you that over the
15 17 years every time he went to Zegna that
16 Ackerman McQueen arranged the appointment for
17 him?
18 A. He did not.
19 Q. Did he tell you that they did it
20 many times?
21 A. He did not.
22 Q. He just said they did it at least

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1 once; is that right?
2 A. He just said they did it. He didn't
3 give a number.
4 Q. Okay. Do you know that -- what is
5 the confidentiality reason for using Ackerman
6 McQueen?
7 MR. COLLINS: Objection to the form.
8 THE WITNESS: Security. People
9 don't need to know. Maremont didn't need to
10 know.
11 BY MR. DICKIESON:
12 Q. Is, do you -- was it your
13 understanding the people in the NRA Treasurer's
14 Office didn't need to know?
15 A. I don't know that that has anything
16 to do with it.
17 He was not hiding it from the
18 Treasurer's Office.
19 Q. So, if it went in on an ordinary NRA
20 credit card, it would go to the Treasurer's
21 Office for payment; is that correct?
22 A. That's --

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1 MR. COLLINS: Objection to the form.
2 THE WITNESS: Are you talking about
3 in the NRA credit card or Wayne LaPierre's?
4 I mean, which, I don't understand your
5 question.
6 BY MR. DICKIESON:
7 Q. Well, let's talk about the Zegna
8 clothing because it is a concrete thing that we
9 can understand.
10 If Wayne LaPierre used an NRA
11 business credit card, that expense would go to
12 the NRA Treasurer's Office for payment. Is that
13 right?
14 A. Yes.
15 Q. And, do you believe that that was
16 not sufficiently confidential for Wayne LaPierre?
17 A. Well, that is not up to me to judge.
18 Q. Do you have any understanding that
19 Mr. LaPierre did not trust the Treasurer's Office
20 with knowledge of his personal expense or his
21 expenses on clothing?
22 MR. COLLINS: Objection to the form.

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1 THE WITNESS: I mean, that is
2 plucked out of the air. No.
3 BY MR. DICKIESON:
4 Q. Okay. So, what is the
5 confidentiality reason for Mr. LaPierre --
6 A. The Press.
7 Q. And so, do you think that The Press
8 had access to the NRA treasurer's office?
9 MR. COLLINS: Objection to the form.
10 THE WITNESS: If there was a leak
11 they would have.
12 BY MR. DICKIESON:
13 Q. Are you aware of leaks coming out of
14 the NRA treasurer's office?
15 A. In the past, yes.
16 Q. And who was responsible for those
17 leaks?
18 A. I can't reveal that.
19 Q. You can't reveal that?
20 A. No.
21 Q. And why is that?
22 A. Because it was part of an Audit

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1 Committee report. And it would have been
2 privileged.
3 Q. And, privileged in what sense?
4 A. I don't -- what do you mean? In
5 what sense, if it --
6 Q. Well your counsel can designate this
7 part of the deposition as being confidential and
8 it won't be disclosed?
9 MR. COLLINS: What he is asking you
10 is, is this subject to an attorney/client
11 privilege -- was it in the executive session?
12 THE WITNESS: Yes.
13 MR. COLLINS: Was there an attorney
14 present?
15 THE WITNESS: Yes.
16 BY MR. DICKIESON:
17 Q. So you are going to refuse to answer
18 that question who the leaker was?
19 MR. COLLINS: I will instruct you
20 not to answer.
21 THE WITNESS: Yes.
22 MR. COLLINS: He is going to ask you

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1 whether you are going to follow that
2 instruction.
3 THE WITNESS: No, I, I can't answer
4 that.
5 BY MR. DICKIESON:
6 Q. Okay. So, then there is a
7 difference between you can't and you won't?
8 A. I won't.
9 Q. Okay. Did the NRA conduct an
10 investigation of leaks within the last -- well,
11 since you have been president of the NRA?
12 A. The NRA itself did not, that I'm
13 aware of.
14 Q. Did any other entity conduct an
15 investigation of people at the NRA for leaks?
16 A. They, it is possible.
17 Q. Do you know if the Brewer Law Firm
18 conducted an investigation of people within the
19 NRA for leaks?
20 A. Yes.
21 Q. And what do you know about that
22 investigation?

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1 MR. COLLINS: I will instruct you
2 not to divulge any substance of
3 communications with the attorneys on this
4 subject.
5 If you otherwise have knowledge, you
6 can answer.
7 THE WITNESS: So, your question?
8 BY MR. DICKIESON:
9 Q. Could you read back the question.
10 (Whereupon, the record was read by
11 the reporter as requested.)
12 THE WITNESS: Nothing.
13 BY MR. DICKIESON:
14 Q. Do you know if they found any
15 additional leaks within the NRA?
16 MR. COLLINS: You can say yes or no.
17 THE WITNESS: No.
18 BY MR. DICKIESON:
19 Q. Do you know if they had people sign
20 affidavits verifying that they were not talking
21 with members of The Press?
22 MR. COLLINS: You can say yes or no

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1 to whether you know whether that happened.
2 THE WITNESS: I do not know.
3 BY MR. DICKIESON:
4 Q. Were you interviewed yourself about
5 leaks to the press.
6 MR. COLLINS: Answer that yes or no.
7 THE WITNESS: No.
8 BY MR. DICKIESON:
9 Q. Do you know anyone who was
10 interviewed?
11 A. About?
12 Q. Leaks to the press. By the Brewer
13 Law Firm or its --
14 A. I do not.
15 Q. Did you know the scope of that
16 investigation?
17 A. No.
18 Q. You don't know if it was limited to
19 the Treasurer's Office or any other limitation on
20 it?
21 A. I do not.
22 Q. Do you know if that investigation

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1 actually looked into the e-mails of people at the
2 NRA?
3 A. Concerning leaks?
4 Q. Yes.
5 A. I do not.
6 Q. You don't know?
7 A. I do not know.
8 Q. Do you know if your e-mails were
9 investigated by the Brewer Law Firm?
10 MR. COLLINS: In connection with
11 leaks or just generally?
12 BY MR. DICKIESON:
13 Q. Just in general.
14 A. In general, yes.
15 Q. And in what way?
16 A. For e-mails, text messages, that
17 sort of thing.
18 Q. And that is in conjunction with the
19 request for discovery in this case to turn over
20 stuff to Ackerman McQueen's lawyers. Is that
21 right?
22 A. I would say yes.

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1 Q. It wasn't with regard to an
2 investigation about leaks. Is that right?
3 A. That's correct.
4 Q. When, the person who was found to be
5 leaking, who you won't disclose, was that person
6 terminated?
7 A. I know of no one being terminated
8 concerning anything concerning leaks.
9 Q. Do you know if that person was
10 disciplined in any way?
11 A. Not to my knowledge.
12 Q. Was there any action taken with
13 respect to that person who was found to have
14 leaked?
15 A. With what, say again.
16 Q. Was there any action, any
17 disciplinary action taken with respect to that
18 person who was found to have been leaking?
19 A. No.
20 Q. Do you know why there was no action
21 taken?
22 A. I do not.

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1 Q. Were you consulted on any
2 disciplinary action against anyone leaking?
3 A. No.
4 Q. Is there a policy at the NRA about
5 talking with members of the press?
6 A. As far as I know, there is no
7 written policy.
8 Q. Is that an informal policy?
9 A. There is discouragement.
10 Q. Do you get calls from reporters
11 asking for information about this litigation?
12 A. Yes.
13 Q. And do you respond to those calls?
14 A. No.
15 Q. Do you refer them to the NRA's PR
16 department, Andrew Arulanandam?
17 A. Yes.
18 Q. Does he then craft some sort of a
19 statement for you to respond?
20 A. On occasion, yes.
21 Q. Do you recall which reporters have
22 been reaching out to you?

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1 A. Recently, very few. Local Atlanta
2 Journal Constitution, Marietta Journal, I think
3 Maremont early on probably did.
4 Others whose name I don't recall.
5 Q. Have you ever provided information
6 on background to any reporter about the NRA?
7 A. What kind of background?
8 Q. Something that is not a crafted
9 statement by Mr. Arulanandam, but, just your
10 talking about here is what I know. Off the
11 record.
12 A. No.
13 Q. Do you know the source of any leaks
14 involving the expenses by Wayne LaPierre?
15 A. No.
16 Q. As the president did you take any
17 steps to try to find out who is leaking about
18 Mr. LaPierre's expenses?
19 A. No. That has nothing to do with my
20 job. That just wouldn't happen.
21 Q. Do you believe that the leaks about
22 Mr. LaPierre's expenses hurts the NRA?

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1 A. Yes.
2 Q. In what way?
3 A. Bad publicity.
4 Q. Do you believe that Dan Boren was
5 concerned about the harm to the NRA if this
6 information about Mr. LaPierre's expenses was
7 disclosed to the press?
8 MR. COLLINS: Objection to the form.
9 THE WITNESS: Do it, I mean, I can
10 give you my opinion.
11 I have no idea why he did what he
12 did. I think he doesn't love his country and
13 NRA like I did or he would not have done it.
14 BY MR. DICKIESON:
15 Q. And by it, in your last answer, does
16 that, are you referring to his warning to Millie
17 Hallow about what might happen? Is that what the
18 it was?
19 A. Yes.
20 Q. And is it your understanding that
21 Oliver North does not love the NRA and America
22 like you do?

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1 MR. COLLINS: Objection to the form.
2 THE WITNESS: I would not say that.
3 I would say he got greedy, and wanted to
4 change rules of NRA and have a paid
5 presidency.
6 And I think he certainly did, my
7 opinion would be he doesn't love NRA like I
8 do.
9 BY MR. DICKIESON:
10 Q. When you say he wanted a paid
11 presidency, did he propose that the presidency be
12 a paid position?
13 A. He did.
14 Q. When did he make that proposal?
15 A. More than one time and it would have
16 been after he became president.
17 Q. And what was the reaction to that
18 proposal?
19 A. By whom?
20 Q. By the other members of the board?
21 A. The other members of the board
22 probably were not aware of it until later.

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1 Q. So, who did he make that proposal
2 to?
3 A. To, in the presence of Childress,
4 Richard Childress and me. And probably others.
5 But, the two of us, I know.
6 Q. Were you aware that Wayne LaPierre
7 convinced Oliver North to become president by
8 offering a position at Ackerman McQueen?
9 MR. COLLINS: Objection to the form.
10 THE WITNESS: I mean your question
11 is wrong. I can't answer an incorrect
12 statement.
13 BY MR. DICKIESON:
14 Q. Okay. So, do you know what, how
15 Wayne LaPierre convinced Oliver North to become
16 president of the NRA for no pay?
17 MR. COLLINS: Objection to the form.
18 THE WITNESS: I don't think he had
19 to convince him. He, he did talk to him
20 about it. He did encourage him.
21 I, in fact, encouraged him to.
22 BY MR. DICKIESON:

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1 Q. Were you aware that there was, that
2 he was going to have to leave his paid position
3 at Fox News to take the position at the NRA?
4 A. Yes.
5 Q. Is it your understanding that you
6 thought that he was just simply sacrificing all
7 income to become an unpaid president of the NRA?
8 MR. COLLINS: Objection to the form.
9 THE WITNESS: It was, I thought it
10 was reasonable. He is 75 years old. If he
11 doesn't have money by now --
12 BY MR. DICKIESON:
13 Q. Do you know what he was making at
14 Ackerman McQueen?
15 MR. COLLINS: Objection. Go ahead,
16 sorry.
17 THE WITNESS: I was told, not by
18 Ackerman McQueen, but by people within NRA.
19 BY MR. DICKIESON:
20 Q. What were you told?
21 A. I was told it was 2,500,000.
22 Q. And, was that during the Audit

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1 Committee meeting where you reviewed his
 2 contract?
 3 A. That was not.
 4 Q. What were you told during the Audit
 5 Committee about what he was making?
 6 A. I was not told.
 7 Q. So, just so I am clear on this, the
 8 Audit Committee that you are a member of,
 9 reviewed the terms of Oliver North's contract
 10 with Ackerman McQueen as a related party
 11 transaction, but you were not told the amount he
 12 was getting paid?
 13 MR. COLLINS: Objection to the form.
 14 THE WITNESS: I did not, I was not
 15 part of reviewing his Ackerman McQueen
 16 contract.
 17 BY MR. DICKIESON:
 18 Q. You were, were you on the phone
 19 during this Audit Committee meeting; is that
 20 right?
 21 A. In September of '18, I was on the
 22 phone.

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1 Q. Okay. And, that is the meeting
 2 where they reviewed the terms of Oliver North's
 3 contract with Ackerman McQueen. Is that correct?
 4 A. That's correct.
 5 Q. And it is your understanding that
 6 you, as a member of the Audit Committee and even
 7 in executive session, was never told the amount
 8 of the contract?
 9 A. I do not remember any figures
 10 concerning his salary. I do not remember.
 11 It could have been.
 12 Q. Did you ask any questions about what
 13 was he making under this contract that we are
 14 going to be approving?
 15 A. I did not.
 16 Q. Did you ask how long the term of the
 17 contract was?
 18 A. I did not.
 19 Q. Do you know how long the term of the
 20 contract was?
 21 A. I do not know.
 22 Q. Do you know if it was guaranteed

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1 during that term?
 2 A. Who or what?
 3 MR. COLLINS: Objection to the form.
 4 BY MR. DICKIESON:
 5 Q. If Oliver North had a guaranteed
 6 payment during the term of the contract?
 7 A. By Ackerman?
 8 Q. By Ackerman.
 9 A. No.
 10 Q. You don't know?
 11 A. No.
 12 Q. And you didn't care?
 13 MR. COLLINS: Objection to the form.
 14 THE WITNESS: Well, yeah, I care.
 15 BY MR. DICKIESON:
 16 Q. But you didn't ask for that
 17 information?
 18 A. Well, I wouldn't have expected an
 19 answer if I had asked.
 20 Q. Well why not?
 21 A. Because Ackerman McQueen was hiring
 22 him, not NRA.

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1 Q. But what was the purpose of the
 2 meeting, to approve a contract that you didn't
 3 know the terms of?
 4 MR. COLLINS: Objection to the form.
 5 THE WITNESS: Okay. You are talking
 6 about a contract between Ackerman McQueen and
 7 Ollie North.
 8 BY MR. DICKIESON:
 9 Q. Correct.
 10 A. So, I mean, it was not up to us to
 11 approve that contract.
 12 Q. Can you look -- go back to
 13 Exhibit 1.
 14 A. Well, I looked at it.
 15 Q. Did you see on the second page of
 16 Exhibit 1 where it discusses the Oliver North
 17 contract?
 18 A. Yes.
 19 Q. And is it your understanding that
 20 this discussion is not an effort to look at the
 21 contract and approve it as an acceptable side job
 22 for Oliver North?

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1 MR. COLLINS: Objection to the form.
2 THE WITNESS: It was not a side job.
3 It would have been --
4 BY MR. DICKIESON:
5 Q. What was it?
6 A. It would have been a main job at two
7 and a half million dollars.
8 Q. But, that is the purpose. Is to
9 approve this main job for Oliver North while he
10 is president of the NRA. Is that correct?
11 A. It was to approve that it was not in
12 conflict with his job as president of NRA.
13 Q. Was there a determination made that
14 there was no conflict between this contract and
15 the NRA?
16 A. As a third-party contract, no.
17 Q. Okay. And so as part of this
18 approval process, the Audit Committee didn't care
19 what the amount was, the term, or any of the
20 other details of the contract. Is that correct?
21 A. Well it is not that they didn't
22 care. It was not really the business of us.

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1 Q. Okay. At this Audit Committee
2 meeting, if you go back to the first page of
3 Exhibit 1, it has a whole list of people that
4 attended this Audit Committee meeting.
5 But then you said ultimately it went
6 into executive session and only a few of these
7 people attended.
8 I take it that there was a
9 discussion with the group in general before you
10 went into executive session. Is that correct?
11 A. Yes.
12 Q. And in that general discussion that
13 is not privileged, did you discuss the Oliver
14 North contract?
15 A. No.
16 Q. What was discussed, if not the
17 items, not the Oliver North contract?
18 A. Well, almost nothing.
19 Q. So, how -- so, how long did the
20 general session last?
21 A. Until, quite a length of time. I
22 don't remember. I think in here it actually said

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1 what time the adjournment was. 2:30 or
2 something.
3 Q. It says the adjournment started at
4 2:40. Do you know what time the meeting started?
5 A. I do not. It should say.
6 Q. So, to clarify?
7 A. I don't remember. I mean, that was
8 a while ago.
9 Q. To clarify your testimony, you
10 believe there was a lot of discussion but it
11 covered very little. Is that a fair-
12 A. Not prior to executive session.
13 Q. Prior to executive session, that is
14 what I'm asking for?
15 A. There would have been very little
16 discussion.
17 Q. Did it go on for a long time?
18 A. Prior to executive session?
19 Q. Prior to executive session.
20 A. No.
21 Q. Okay. So, do you know why all of
22 these other people attended if the they were

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1 going to be almost immediately thrown to the
2 curb?
3 A. They didn't know they would be
4 thrown to the curb.
5 Q. Okay. There is a reference to Sarah
6 Rogers, partner, and Travis Carter, Managing
7 Director of Public Affairs from Brewer Attorneys
8 and Counselors, were they present during the
9 executive session to your knowledge?
10 A. Yes.
11 Q. Both of them?
12 A. Yes.
13 Q. And do you know why Travis Carter,
14 who does public affairs work for the Brewer firm,
15 was present during the executive session?
16 MR. COLLINS: Objection to the form.
17 THE WITNESS: I do not.
18 BY MR. DICKIESON:
19 Q. And, was Lisa Supernaugh, managing
20 director of executive operations, present during
21 executive session?
22 A. I don't think so.

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1 Q. Okay. Do you know if Emily Cummins
2 was present during executive session?
3 A. I know she was not.
4 Q. And, these others Scott Bach, Pete
5 Brownell, Todd Ratner, Wilson Philips, Joshua
6 Powell, were any of them present during executive
7 session?
8 A. I don't think any of those you named
9 were.
10 Q. So, as you recall today, under oath,
11 you don't believe that the Oliver North contract
12 was discussed in the open session of this Audit
13 Committee meeting?
14 A. I do not.
15 Q. Are there any minutes from that open
16 session of the Audit Committee meeting on that
17 date September 6, 2018?
18 A. That would be it.
19 Q. Do you see any reference here to
20 anything, any notes or minutes from that open
21 session?
22 A. No.

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1 Q. Do you know who has responsibility
2 for keeping the minutes of the Audit Committee?
3 A. I do. Warner, the secretary, would
4 have.
5 Q. Who was Warner, the secretary?
6 A. Of Audit Committee.
7 Q. What is his full name?
8 A. I don't know.
9 Q. Is he one of the people listed as
10 being present?
11 A. He works for NRA.
12 MR. COLLINS: Tell him when you see
13 it or not.
14 THE WITNESS: No, I do not see.
15 Every NRA committee has a secretary who
16 actually is appointed by Wayne LaPierre with
17 the suggestion usually of that committee.
18 And that person is always an NRA employee.
19 If you've got the big book of
20 minutes --
21 MR. COLLINS: Not here.
22 THE WITNESS: And then the

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1 directory. I just can't remember it.
2 MR. COLLINS: That is fine. If we
3 don't know, we don't know today.
4 BY MR. DICKIESON:
5 Q. Do you have any responsibilities
6 with respect to the NRA Foundation?
7 A. In that I am a voting member, yes.
8 Q. A voting member of what?
9 A. The foundation. As president.
10 Q. As president of the NRA, does that
11 make you president of the foundation?
12 A. No, but I am a voting member.
13 Q. Okay. And, how many voting members
14 are there in the foundation?
15 A. Right now 14.
16 Q. And how are those voting members
17 selected?
18 A. By election. They are nominated by
19 the nominating committee. And elected.
20 Q. Do you know if the foundation pays
21 the NRA a management fee every year?
22 A. I do not.

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1 Q. Do you know who handles the
2 administrative tasks for the Foundation?
3 A. I do.
4 Q. Who is that?
5 A. The secretary who is an attorney and
6 god, what is his name. It is a guy. I will
7 think of his name. I can't think of his name. I
8 am terrible with names. I apologize.
9 Q. Does the Foundation have its own
10 office?
11 A. No.
12 Q. Does it pay the NRA some office
13 compensation for having space within the NRA
14 office?
15 A. Yes.
16 Q. Is that along with other, a
17 management fee for not only space but for
18 services, secretarial services, paper, copy
19 machines, are you aware of that kind of a
20 payment?
21 A. I am aware of the payment. I would
22 think that it includes all of the things you

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1 mentioned.
2 Q. Okay. Do you know if it includes
3 programs that the NRA does that could have a
4 nonprofit purpose?
5 A. Okay. Say again. Do you --
6 Q. Do you know if the NRA Foundation
7 pays the NRA, and I believe it is millions of
8 dollars, for programs that the NRA does that are
9 consistent with the NRA Foundation's purpose?
10 MR. COLLINS: Objection to the form.
11 THE WITNESS: They are funded
12 separately through the Foundation.
13 They have a different budget.
14 BY MR. DICKIESON:
15 Q. Right. But do you know if the
16 Foundation transfers money to the NRA for
17 programs?
18 A. Like what?
19 Q. Let's say gun education.
20 A. Not to my knowledge.
21 Q. Okay. Do you know if there was a
22 written contract between the Foundation and the

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1 NRA to provide, to move money from the Foundation
2 to the NRA?
3 A. No.
4 Q. No there is no such contract or you
5 don't know of one?
6 A. No, I do not think there is any
7 contractual agreement.
8 Q. Okay. There was, are you aware --
9 A. Committee secretary, but not the
10 name.
11 MR. COLLINS: Okay.
12 THE WITNESS: Sorry.
13 BY MR. DICKIESON:
14 Q. As you are looking at that Exhibit 1
15 and it refers to a secretary?
16 MR. COLLINS: Without a name.
17 THE WITNESS: Yes, it says committee
18 secretary.
19 BY MR. DICKIESON:
20 Q. Okay.
21 A. But it does not give the name.
22 Q. Did you at some point believe that

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1 the phone call Oliver North made to Millie
2 Hallow, that you overheard, was recorded?
3 A. By him?
4 Q. By anyone.
5 A. No.
6 Q. So, you didn't tell anyone you
7 thought that there was a recording of the call?
8 A. No.
9 Q. You didn't have any discussion with
10 Bill Brewer who said there was no tape of the
11 call?
12 MR. COLLINS: I would say yes or no
13 if you did.
14 THE WITNESS: No.
15 BY MR. DICKIESON:
16 Q. Does the NRA have a written business
17 model?
18 A. Not that I'm aware of.
19 Q. Are you aware of any business model
20 that Brewer drafted and presented to the NRA?
21 A. No.
22 Q. Did you at some time vote to revoke

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1 the approval of the Oliver North contract?
2 A. Yes.
3 Q. What was your reason for revoking
4 that contract?
5 A. Because I thought he had been
6 disloyal to NRA. And I didn't think he was
7 deserving of it.
8 Q. If someone had been misusing NRA
9 funds and Oliver North reported that, do you
10 think that that would be disloyal to the NRA?
11 A. Well, you are assuming one thing.
12 You got to have --
13 Q. It is a hypothetical question?
14 A. No, I can't answer that.
15 Q. Okay. All right.
16 Did you investigate whether or not
17 Oliver North was in fact acting in the best
18 interest of the NRA or not?
19 A. Did I?
20 Q. Did you investigate, yes?
21 A. No.
22 Q. You just assumed based on what you

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1 heard and the phone call that he was acting
2 contrary to the NRA; is that right?
3 MR. COLLINS: Objection to the form.
4 THE WITNESS: No, I didn't assume.
5 I knew.
6 BY MR. DICKIESON:
7 Q. Based on what?
8 A. On his, hearing him talk.
9 Q. Okay. Do you know how many board
10 members resigned from the board in 2019?
11 A. I believe it was six.
12 Q. And who were they?
13 A. Oh, Dan Boren, Esther Schneider, I
14 can't remember. I just don't remember all of the
15 names.
16 Q. All right. Mr. Childress?
17 A. He did, in '19 -- yes. Give me
18 names, I will tell you yes or no.
19 Q. Were they all, did they all resign
20 based on the negative publicity that we have been
21 discussing?
22 A. As far as I know --

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1 MR. COLLINS: Objection to the form.
2 But go ahead.
3 THE WITNESS: As far as I know, none
4 of them resigned because of that.
5 BY MR. DICKIESON:
6 Q. Okay.
7 A. I could go one by one.
8 Q. To the extent you know, why don't
9 you do that.
10 A. Richard Childress because of the
11 nature of his business. He had a threat from one
12 of his sponsors. And, which he had said that he
13 expected.
14 And he said that he would still
15 remain true to the second amendment, which he
16 has.
17 Esther Schneider, I don't know why,
18 I have reasons why I believe.
19 The only couple that I know for sure
20 because they told me, John Fodus, who resigned
21 and I talked to, because he is a fundraiser. He
22 said that he felt he could raise more money for

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1 NRA by not being a board member.
2 The others I would speculate as to
3 why.
4 Q. Does the Brewer Law Firm perform
5 public relations services for the NRA?
6 A. Very limited.
7 Q. What is the public relations
8 services they do provide?
9 A. Well, I don't know if you would call
10 it public relations.
11 But, dealing with press releases,
12 which Mr. Brewer does, in fact, himself.
13 Q. Does Travis Carter provide any
14 services to the NRA?
15 A. Yes.
16 Q. And those are public relations
17 services?
18 MR. COLLINS: Objection to the form.
19 THE WITNESS: I would say yes.
20 BY MR. DICKIESON:
21 Q. And do you know what services he
22 provides?

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1 A. He works with Andrew some.
2 Q. Are there any other people in the
3 Brewer Law Firm that do public relations that
4 work with Andrew?
5 A. Not to my knowledge.
6 Q. Do you know how much the NRA pays
7 the Brewer Law Firm for public relations work?
8 A. No.
9 Q. Have you approved any contract for
10 public relations work payable to the Brewer Law
11 Firm?
12 A. Not that I recall.
13 Q. Do you believe that such a contract
14 would be part of that exception that we have
15 discussed for hiring a law firm?
16 And so it would not go through the
17 normal two out of three officers for approval?
18 A. I believe that it would not go
19 through the three officers.
20 Q. And if it is for public relations
21 work, what would be the reason for it not going
22 through those channels?

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1 A. It would be to my understanding they
2 are all under one umbrella.
3 Q. So, the legal work and the public
4 relations work is under one umbrella in the
5 Brewer Law Firm.
6 A. That is my understanding.
7 Q. Do you know how long Josh Powell is
8 scheduled to be on leave?
9 MR. COLLINS: Objection to the form.
10 THE WITNESS: I do not.
11 BY MR. DICKIESON:
12 Q. Is it your understanding that he is
13 on leave?
14 A. Yes.
15 Q. Is it a permanent arrangement as far
16 as you know?
17 MR. COLLINS: Objection to the form.
18 THE WITNESS: A permanent
19 arrangement?
20 BY MR. DICKIESON:
21 Q. A permanent leave.
22 A. No.

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1 Q. So, is there a time limit to how
2 long that leave will last?
3 A. No.
4 Q. Is there a time period when his pay
5 runs out and they will no longer compensate him
6 for being on leave?
7 MR. COLLINS: Objection to the form.
8 THE WITNESS: Well, yes. I believe
9 it is not going on forever.
10 BY MR. DICKIESON:
11 Q. So, do you know how long that time
12 limit is?
13 A. No. It has not been determined.
14 Q. Who is going to make that
15 determination?
16 MR. COLLINS: Objection to the form.
17 THE WITNESS: NRA with legal
18 counsel, the Brewer firm.
19 BY MR. DICKIESON:
20 Q. Is there a formal proceeding like an
21 arbitration proceeding with Mr. Powell?
22 MR. COLLINS: Objection to the form.

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1 If you know.
2 THE WITNESS: Yes.
3 BY MR. DICKIESON:
4 Q. And, is that through the American
5 Arbitration Association?
6 MR. COLLINS: Objection to the form.
7 THE WITNESS: I haven't -- I don't
8 know.
9 BY MR. DICKIESON:
10 Q. Are you kept apprised of the status
11 of that arbitration proceeding?
12 A. Yes.
13 Q. Who advises you about that status?
14 A. Mr. Brewer.
15 Q. Okay. And does he do that in
16 meetings with the officers?
17 A. Personally and in conference call.
18 Q. Is it your understanding that
19 Mr. Powell's status on leave is a secret?
20 A. No. And actually it is vacation.
21 Q. Paid vacation?
22 A. Correct.

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1 Q. Is that because he has accrued paid
2 vacation time over the years?
3 A. That is my understanding.
4 Q. Okay. And so it should be easy for
5 someone to calculate how long that paid vacation
6 time will last. Is that right?
7 MR. COLLINS: Objection to the form.
8 THE WITNESS: Yes.
9 BY MR. DICKIESON:
10 Q. Do you know what Mr. Powell's pay
11 rate is?
12 A. Yes.
13 Q. What is it?
14 MR. COLLINS: You could say if you
15 know.
16 THE WITNESS: [REDACTED]
17 BY MR. DICKIESON:
18 Q. Per year?
19 A. Yes.
20 Q. And do you know what benefits he
21 gets?
22 MR. COLLINS: Objection to the form.

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1 THE WITNESS: I know that he gets
2 benefits. I'm not sure what all.
3 BY MR. DICKIESON:
4 Q. Have you had any contact with
5 Mr. Powell since he was put on leave?
6 A. No.
7 Q. Did you have, did you have a good
8 relationship with Mr. Powell?
9 MR. COLLINS: Objection to the form.
10 THE WITNESS: Generally, yes.
11 BY MR. DICKIESON:
12 Q. How often would you interact with
13 him?
14 A. As a board member, fairly often.
15 As chief of staff, occasional.
16 Q. Do you know who at the NRA is in
17 contact with Mr. Powell?
18 MR. COLLINS: If you know.
19 THE WITNESS: I know there have been
20 some contacts. It is my understanding
21 currently no one is communicating with him.
22 BY MR. DICKIESON:

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1 Q. Is it your understanding that there
2 was no communication between him and Wayne
3 LaPierre at present?
4 A. Currently, no.
5 Q. Is he, do you know if Mr. Powell is
6 in Michigan?
7 MR. COLLINS: Objection to the form.
8 THE WITNESS: I do not know.
9 BY MR. DICKIESON:
10 Q. Do you know if that is where his
11 family lives?
12 A. I do not know.
13 MR. SCHERTLER: Can I ask just a
14 quick question to follow up, does somebody at
15 the NRA know how to contact Mr. Powell if
16 they need to?
17 THE WITNESS: Yes.
18 MR. SCHERTLER: So they can make
19 communication with him if need be?
20 THE WITNESS: Yes.
21 MR. SCHERTLER: The fact that he is
22 still receiving pay and benefits from the

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1 NRA, I assume there is at least contact
2 between him and the HR office regarding any
3 issues that might come up in that regard.
4 MR. COLLINS: Objection to the form.
5 To the extent you know.
6 THE WITNESS: I do not know that
7 through HR.
8 MR. SCHERTLER: But he is receiving
9 benefits pay and salary that are provided by
10 the NRA through HR.
11 MR. COLLINS: Objection to the form.
12 If you know.
13 THE WITNESS: I do not know that.
14 MR. SCHERTLER: You do not know that
15 he is receiving salary and benefits.
16 THE WITNESS: I know he is receiving
17 that. You said through HR.
18 MR. SCHERTLER: I apologize.
19 Somebody at the NRA is providing him with
20 salary and benefits?
21 THE WITNESS: Yes.
22 MR. SCHERTLER: Thanks.

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1 BY MR. DICKIESON:
2 Q. I want you to go to Exhibit 114.
3 But this time 14B.
4 This is the Wall Street Journal
5 article.
6 A. Okay. Here we go. Both of these.
7 This is one.
8 Q. Do you have 14B in front of you?
9 A. I do.
10 Q. Okay. And, the second paragraph of
11 this article by Mark Maremont of the Wall Street
12 Journal states that "Documents posted anonymously
13 on the internet provide new details of the
14 clothing, travel, and other expenses totaling
15 more than 542,000."
16 You testified about that with
17 Mr. Schertler. Is that correct?
18 A. Yes.
19 Q. And I wanted to focus in on posting
20 on the internet.
21 What do you know, have you gone to
22 the internet to see if you can find where these

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█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]

6 BY MR. DICKIESON:
7 Q. You were on the finance committee
8 during this time; is that correct?
9 A. No. Not at that time.
10 Q. Was -- so, you didn't have any
11 information about financial decisions by the NRA
12 during this time period?
13 MR. COLLINS: Objection to the form.
14 THE WITNESS: I, whether I was on
15 finance or not, I would have attended
16 meetings if it didn't conflict with another
17 one.
18 But, I mean I was not part of that.
19 BY MR. DICKIESON:
20 Q. So, were you privy to the
21 discussions about cost savings measures like
22 cutting retirement plans?

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1 A. I knew about it, I was not part of
2 the discussions.
3 Q. Were you part, how did you know
4 about it if you were not part of the discussions?
5 A. Because Wayne LaPierre outlined a
6 number of cost savings.
7 Q. Did Wayne LaPierre include in those
8 cost savings a reduction of his own salary?
9 A. He did not take a reduction in
10 salary. He, he for two years I am aware of did
11 not take an increase in salary.
12 Q. And I believe you testified you
13 thought his salary currently was [REDACTED]
14 [REDACTED]
15 Is that right?
16 MR. COLLINS: Objection to the form.
17 THE WITNESS: I did not say that.
18 BY MR. DICKIESON:
19 Q. [REDACTED], I believe
20 you said; is that right?
21 A. No, I said [REDACTED]. I
22 believe.

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1 Q. Okay.
2 A. Is what I said.
3 Q. Is it your understanding that it was
4 less than [REDACTED]
5 A. Yes.
6 Q. Do you review the NRA's Form 990
7 that gets submitted to the IRS as part of your
8 responsibility as president?
9 A. I do not.
10 Q. Do you know who has responsibility
11 for reviewing those Form 990 forms?
12 A. Yes, Craig Spray's shop.
13 Q. Are you aware that the publicly
14 disclosed Form 990 shows Mr. LaPierre's salary is
15 currently over [REDACTED]?
16 A. I am aware.
17 MR. COLLINS: Objection to the form.
18 BY MR. DICKIESON:
19 Q. So, why are you saying that his
20 salary is less than [REDACTED]
21 A. Because his salary is not. He took
22 deferred payment in that reporting period that

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1 pumped it up.
2 Plus he does get a bonus.
3 Q. Okay.
4 A. But you asked about salary.
5 Q. I see. I'm glad I clarified that.
6 In the next line on Item 5 of
7 Exhibit 17 it says WP, OLN and CC. You have
8 explained who WP and OLN are -- is CC in this
9 case, is that Mr. Cotton or Mr. Cox, to your
10 knowledge?
11 A. I don't know. I would say Cox.
12 Q. Do you recall him being at that
13 meeting?
14 A. Yes.
15 Q. Do you recall Mr. Cotton being at
16 that meeting?
17 A. No. He was not an officer at that
18 meeting.
19 Q. Later on at this meeting was there a
20 discussion about Josh Powell at this meeting.
21 I know that the agenda says that
22 Oliver North wanted to have one.

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1 Was there a discussion about Josh
2 Powell?
3 A. As I recall, very little.
4 Q. Was it at this meeting that you
5 learned about the sexual harassment charge
6 against Josh Powell?
7 A. No.
8 Q. Was it before this meeting?
9 MR. COLLINS: Objection to the form.
10 THE WITNESS: I believe it would
11 have been after.
12 BY MR. DICKIESON:
13 Q. So, even though there was
14 discussion, some discussion about Josh Powell, it
15 wasn't enough to inform you about the sexual
16 harassment claim?
17 MR. COLLINS: Objection. I think
18 you said by Josh Powell. Or maybe I
19 misunderstood.
20 THE WITNESS: Would you repeat the
21 question?
22 BY MR. DICKIESON:

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1 Q. Right. So, I will rephrase it.
2 I'm trying to pin down when you
3 learned about the harassment charge against Josh
4 Powell.
5 You think it was after this
6 October 2018 meeting. Is that correct?
7 A. I believe so.
8 Q. And, there was no discussion at this
9 meeting about the harassment charge against Josh
10 Powell?
11 A. I don't recall. I just don't know.
12 Q. Okay.
13 A. There could have been.
14 Q. Do you recall discussion at this
15 meeting about Russia issues?
16 A. Do not.
17 Q. Was, do you recall any discussion
18 where both you and Oliver North were present
19 where Russia was being discussed?
20 A. I don't recall when. I believe
21 there would have been perhaps a meeting where it
22 would have come up.

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1 Q. And, do you recall what was said
2 when it came up?
3 A. Not when he was president, no.
4 Q. I'm going to have marked as the next
5 exhibit, 24, a October 2nd, 2019, letter on
6 United States Senate letterhead from Charles
7 Schumer, Minority Leader, and Ron Wyden ranking
8 member of the Senate Committee on Finance.
9 You were president on October 2nd,
10 2019. Is that right.
11 (Meadows Exhibit Number 24
12 marked for identification.)
13 MR. COLLINS: Objection to the form.
14 THE WITNESS: Yes.
15 BY MR. DICKIESON:
16 Q. And were you aware of this letter
17 that the United States Senate sent to the
18 Internal Revenue Service about the NRA?
19 A. No.
20 Q. Have you ever seen this letter?
21 A. No.
22 Q. Have you ever heard about this

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1 letter?
2 A. No.
3 Q. Well then I will let you --
4 A. I don't think I have; I am reading
5 it. I don't, I don't remember --
6 Q. Why don't we take a break?
7 A. Schumer.
8 Q. And you can read it during the break
9 and we can reconvene in a couple of minutes or
10 five minutes or so.
11 A. Okay.
12 (Recess taken -- 5:50 p.m.)
13 (After recess -- 6:12 p.m.)
14 BY MR. DICKIESON:
15 Q. All right, rather than having you
16 read through this, let me direct your attention
17 to the footnote which is right up there with one
18 of the longest footnotes I have seen.
19 A. That is fine.
20 Q. Footnote 3 it says, "Allegations
21 related to NRA Executive Vice President Wayne
22 LaPierre charging NRA ad agency Ackerman McQueen

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1 more than \$240,000 for expenses related to
2 international trips to locations including the
3 Bahamas, Italy and Reno, Nevada, with inadequate
4 documentation."
5 Wall Street Journal, NRA Chief Wayne
6 LaPierre Questioned on Travel Expenses, May 2nd,
7 2019.
8 And the next phrase is "Allegations
9 contained in a memo prepared by NRA accountants
10 and presented to NRA's Audit Committee."
11 So, stopping right there in that, do
12 you recall receiving a memo from NRA accountants
13 presented to the NRA's Audit Committee?
14 A. So, is that saying the May 2nd,
15 2019.
16 Q. That is the date of the article.
17 This is the next line item. And the audit, the
18 accountants talk about a variety of issues
19 including payments to an IT consulting firm with
20 links to NRA's CFO and treasurer, a \$1.8 million
21 rental of a home belonging to a film producer who
22 had a relationship with executive vice president

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1 Wayne LaPierre. \$200,000 in wardrobe purchases.
2 Do you recall receiving a memo
3 prepared by the NRA accountants on various
4 alleged improprieties?
5 MR. COLLINS: Objection to the form.
6 THE WITNESS: No.
7 BY MR. DICKIESON:
8 Q. Do you recall the NRA Treasurer's
9 Office preparing a list of concerns for the Audit
10 Committee?
11 A. No.
12 Q. Do you attend all of the Audit
13 Committee meetings during 2019?
14 A. I believe so.
15 Q. Do you receive all of the materials
16 submitted to the Audit Committee during 2019?
17 A. If I was in attendance, yes.
18 Q. And, if your prior answer was you
19 think you attended them all --
20 A. Yes.
21 Q. Then you would have received all of
22 the submissions during 2019. Is that correct?

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1 A. I believe that would be true.
2 Q. Okay. Do you recall any discussion
3 about a \$1.8 million rental of a home belonging
4 to a film producer who had a relationship with
5 Executive Vice President Wayne LaPierre?
6 A. Not in the Audit Committee.
7 Q. In some other setting you heard
8 about that, correct?
9 A. Correct.
10 Q. And what did you hear about that?
11 A. I heard that filming was done there
12 and that the owner of the home actually charged a
13 rental fee to, for the filming there.
14 Q. Of [REDACTED] ?
15 A. I didn't, I don't know that sum.
16 Q. Did you sign off on that rental
17 agreement?
18 A. No.
19 Q. Do you know when that rental
20 agreement was?
21 A. No.
22 Q. Do you know who did sign off on that

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1 rental agreement?
2 A. No.
3 Q. Further down it says that "The memo
4 addressed allegations of multiple instances of
5 sexual harassment by NRA senior official Josh
6 Powell and allegations that the NRA used tax
7 exempt funds to pay a settlement," in Pro
8 Publica.
9 The NRA used funds to settle a
10 sexual harassment claim against a top official
11 and then he was accused again August 28, 2019?
12 Do you recall any discussion of that
13 in the Audit Committee?
14 A. No.
15 Q. Do you recall seeing that article in
16 Pro Publica?
17 A. No.
18 Q. Is that a factually correct
19 statement that the NRA used funds to settle a
20 sexual harassment claim and then there was, and
21 then Josh Powell had another one?
22 MR. COLLINS: Objection to the form.

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1 THE WITNESS: I don't know the
2 answer, but I do not believe that to be true.
3 BY MR. DICKIESON:
4 Q. Okay. What is the reason for Josh
5 Powell being put on leave?
6 MR. COLLINS: Objection to the form.
7 THE WITNESS: I couldn't answer
8 that.
9 BY MR. DICKIESON:
10 Q. Okay. "Allegations NRA approved
11 excessive payments to outside firm of William
12 Brewer, III," as published in Pro Publica.
13 "New documents raised ethical and
14 billing concerns about the NRA's outside
15 counsel."
16 Do you recall discussing that
17 article in the Audit Committee?
18 A. No.
19 Q. It also refers to ████████ in
20 payments to a media production company in which
21 Tyler Schropp, Executive Director of NRA's Office
22 of Advancement, held a financial interest.

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1 Do you recall any discussion of that
2 in the Audit Committee?
3 A. No.
4 Q. Do you recall any discussion of
5 responding to this particular letter?
6 A. No.
7 Q. Let me have marked as the next.
8 (Meadows Exhibit Number 25
9 marked for identification.)
10 BY MR. DICKIESON:
11 Q. Exhibit 25, an e-mail from Millie
12 Hallow to Andra Fischer dated April 29th, 2019.
13 For the record, this is a document produced by
14 the NRA bearing Bates Stamp Number NRA-AMC 59590
15 through 59593.
16 It has a brief e-mail message
17 transmitting something called NRA Points of
18 Concern.
19 Have you seen this resolution that
20 is attached to this e-mail message?
21 A. So, I don't see the resolution.
22 Q. You think you saw this resolution?

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1 A. No, I don't see a --
2 MR. COLLINS: Here she doesn't see a
3 resolution.
4 THE WITNESS: Where does this --
5 BY MR. DICKIESON:
6 Q. Page 2. The top of the page, the
7 title is Resolution of NRA Board of Directors
8 Points of Concern and Legal Exposure.
9 MR. COLLINS: Page 2. Yes, let's go
10 back to the front.
11 THE WITNESS: Okay. There is
12 Page 2.
13 MR. COLLINS: I mean, is it that
14 page you are talking about.
15 BY MR. DICKIESON:
16 Q. Page 2 of the exhibit.
17 A. Oh, not Number 2. Okay. Okay.
18 I don't see anything saying
19 resolution.
20 Q. At the top of the page. Do you see
21 the title?
22 A. I see the title.

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1 Q. Resolution of NRA Board of Directors
2 Points of Concern and Legal Exposure.
3 Do you see that?
4 A. Yes.
5 Q. So, is this a resolution, to your
6 knowledge, that was presented to and passed by
7 the Board of Directors?
8 A. No.
9 Q. Do you know what this, where this
10 resolution came from?
11 A. I have no idea.
12 Q. You've had a couple of minutes to,
13 or a couple of moments, I should say, to review
14 this.
15 Has reviewing this refreshed your
16 recollection about this document at all?
17 A. No.
18 Q. Has, are there issues in this
19 resolution that were addressed by the NRA board
20 at any time?
21 A. Not to my knowledge. Who authored
22 this?

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1 Q. That is what I am trying to answer.
2 This is a document provided to us by the NRA from
3 their files showing it is from Millie Hallow to
4 Andra Fischer.
5 But you don't know anything about
6 it?
7 A. Nothing.
8 Q. And this is at a time period when
9 you are president of the NRA; is that correct?
10 April of 2019?
11 A. Well, April what? 29th? That was
12 when I would just have become.
13 Q. Okay.
14 A. I mean, this doesn't make sense to
15 me, the first page.
16 MR. COLLINS: It is, you don't have
17 to, let him ask questions.
18 BY MR. DICKIESON:
19 Q. What about it doesn't make sense to
20 you?
21 A. None of it.
22 Q. All right. If I could have a couple

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1 of minutes and we will see if there is any other
2 questions I have. Take a break?
3 MR. COLLINS: Okay.
4 (Recess taken -- 6:23 p.m.)
5 (After recess -- 6:35 p.m.)
6 EXAMINATION
7 BY MR. COLLINS:
8 Q. Ms. Meadows, just a couple of
9 questions for you.
10 Earlier today do you remember some
11 questions and answers about documents that were
12 discarded?
13 A. Yes.
14 Q. Okay. Did those documents include
15 documents concerning your personal life and the
16 personal life of your family?
17 A. Yes.
18 Q. Would it have included medical
19 information concerning you and your family?
20 A. Yes.
21 Q. Okay. At the time you discarded
22 documents, were you aware of any preservation

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1 notice in connection with any issues involving
2 Ackerman McQueen?
3 A. No.
4 Q. At the time that you may have
5 discarded documents, were you aware of any
6 preservation notice in connection with any issues
7 with the New York Attorney General?
8 A. No.
9 Q. Did any attorney, did you speak with
10 any attorney for the NRA around this time that
11 you may have discarded documents?
12 A. No.
13 MR. COLLINS: That is all I have.
14 MR. SCHERTLER: I have a couple of
15 follow up questions if you don't mind.
16 MR. COLLINS: Sure. And subject to
17 your questions. I may have a couple.
18 FURTHER EXAMINATION
19 BY MR. SCHERTLER:
20 Q. So, on this same topic, I believe
21 you testified earlier today that it was in early
22 2019 that you destroyed, I think you said burnt

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1 or shred, notes that you had taken of telephone
2 conferences, of meetings, in connection with NRA
3 related work. Is that correct?
4 MR. COLLINS: Objection to the form
5 of the question.
6 THE WITNESS: I did say I destroyed
7 some documents.
8 BY MR. SCHERTLER:
9 Q. Correct. But, I think what
10 Mr. Collins asked is if some of those, at least
11 some of those documents included personal records
12 such as medical records. And you said they did.
13 Correct?
14 A. Correct.
15 Q. Did some of those documents also
16 include notes that you had taken of NRA work-
17 related phone conferences or meetings?
18 A. Some.
19 Q. So, some included, so, the documents
20 that you destroyed included both personal
21 documents and work related documents. Is that
22 correct?

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1 A. Some. Yes.
2 Q. And, I believe you also testified
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 MR. COLLINS: Objection to the form.
7 You can answer.
8 THE WITNESS: Actually, I misspoke,
9 that was not correct.
10 BY MR. SCHERTLER:
11 Q. Why did you misspeak, can you
12 explain that?
13 MR. COLLINS: Objection to the form.
14 You can answer.
15 THE WITNESS: Not really clear on
16 what the question was.
17 BY MR. SCHERTLER:
18 Q. But, did you get, but, your answer,
19 as I recall and I don't have it verbatim, was
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]

[REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 MR. COLLINS: Objection to the form
7 of the question.
8 THE WITNESS: All right. Restate
9 the question.
10 BY MR. SCHERTLER:
11 Q. Didn't you say, earlier today, that
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 MR. COLLINS: Objection to the form
20 of the question.
21 THE WITNESS: And, that would have
22 been later, no.

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1 BY MR. SCHERTLER:
2 Q. So --
3 [REDACTED].
4 Q. So, what then prompted you to
5 destroy both personal notes and records as well
6 as NRA work-related notes and records?
7 MR. COLLINS: Objection to the form
8 of the question.
9 THE WITNESS: There was personal,
10 sensitive information that actually would
11 have been integrated with NRA and maybe other
12 boards that I felt like I should not turn
13 over.
14 BY MR. SCHERTLER:
15 Q. So, that prompted you to destroy
16 both personal records as well as records that
17 related to your work with the NRA?
18 MR. COLLINS: Objection to the form
19 of the question.
20 THE WITNESS: Yes.
21 BY MR. SCHERTLER:
22 Q. And you are saying you couldn't

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1 separate the two out? You couldn't separate
2 notes that involved conferences or meetings with
3 the, with, that were related to the NRA work with
4 conferences or notes that were related to
5 personal matters or medical matters?
6 MR. COLLINS: Objection to the form.
7 THE WITNESS: I could. It would
8 have been a lot of trouble. And I saw no
9 value in keeping it.
10 BY MR. SCHERTLER:
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]

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1 [REDACTED]

2 MR. COLLINS: Objection to the form.

3 THE WITNESS: It actually was in the

4 form, a written form.

5 BY MR. SCHERTLER:

6 Q. When you say written form, could you

7 describe or explain what you mean by that?

8 A. I could not. To, it had to do with

9 retaining records.

10 Q. And, your --

11 A. But it was after the fact.

12 Q. Your claim now it was after the

13 fact, correct?

14 A. Yes.

15 MR. COLLINS: Wait, objection to the

16 form.

17 BY MR. SCHERTLER:

18 Q. You can maintain a standing

19 objection to the form.

20 But, earlier today you said it was

21 the reason that you, that that information was

22 the reason that prompted you to destroy your

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1 MR. COLLINS: You can say yes or no.

2 THE WITNESS: Not what you are

3 talking about.

4 BY MR. SCHERTLER:

5 Q. You are talking about the answers

6 that you gave to them. Have you discussed that

7 since the time you initially gave your answers

8 about Mr. Frazer's advice being the reason you

9 destroyed the documents?

10 MR. COLLINS: Objection to the form.

11 And I apologize, that first part I don't know

12 how that fits together.

13 But, if you understood it, but ...

14 MR. SCHERTLER: You know, you are

15 interrupting a little bit too much, Mike. I

16 don't mind the objection to form.

17 But, I'm asking questions, you

18 interrupt, you interrupt the flow of the

19 question and the answer. And I think that is

20 actually some form of coaching the witness.

21 So, I would ask you, I would ask you

22 to be a little bit more circumspect about

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1 personal notes and records as well as your NRA

2 work notes and records, correct?

3 MR. COLLINS: Objection to the form.

4 THE WITNESS: And I misspoke.

5 BY MR. SCHERTLER:

6 Q. That is a pretty strong

7 misstatement.

8 Did -- were you advised by your

9 lawyers to say something different?

10 MR. COLLINS: Objection to the form.

11 Don't get into anything, anything about what

12 you talked with your attorneys about.

13 THE WITNESS: No.

14 BY MR. SCHERTLER:

15 Q. Have you discussed --

16 MR. COLLINS: Objection to the form.

17 BY MR. SCHERTLER:

18 Q. Have you discussed this issue,

19 without saying what they said or what you said,

20 have you discussed this particular topic with

21 your attorneys in the break since you first

22 answered those questions?

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1 what you are objecting to and when you object.

2 MR. COLLINS: Oh, thank you very

3 much. I really appreciate that. Could you

4 read that question back?

5 MR. COX: All you are saying is

6 objection to form, Dave.

7 MR. SCHERTLER: I said we can have

8 an objection to form standing.

9 But, what he is doing in his, in

10 halting the witness from answering the

11 question, he is interrupting the flow.

12 This is improper, if a judge were to

13 hear what he is doing, the judge would

14 sustain my objection.

15 MR. COX: There is absolutely no

16 coaching, Dave, if you want to bring it to a

17 judge, you may.

18 MR. SCHERTLER: We may well do that

19 if this continues. I have put up with it for

20 a long time, and I have tried to be very

21 polite and respectful. But now it is getting

22 into an area where I do feel you are trying

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1 A. Then again --
2 MR. COLLINS: It has been asked and
3 answered, David.
4 THE WITNESS: I would say I
5 misspoke.
6 BY MR. SCHERTLER:
7 Q. So, the rules of the, the rules of a
8 deposition, and we have been very cordial with
9 you about this, are to tell the truth to the best
10 of your recollection. And you have been very
11 good about saying things that you don't remember,
12 you don't know.
13 When you spoke this morning, you
14 were pretty definitive about what you recalled
15 about Mr. Frazer's advice being the reason for
16 you destroying the records; is that fair to say?
17 MR. COLLINS: Objection to the form.
18 THE WITNESS: No, I don't think it
19 is fair at all.
20 MR. SCHERTLER: That is it.
21 MR. DICKIESON: I have a couple of
22 questions.

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1 MR. COLLINS: You didn't ask any
2 questions about this topic beforehand.
3 MR. DICKIESON: I could have but she
4 had a definitive answer.
5 MR. COLLINS: You don't get to
6 question it now.
7 MR. DICKIESON: I'm going to ask the
8 questions now.
9 MR. COX: How much longer are you
10 going to go, Dave.
11 MR. DICKIESON: Just a couple of
12 questions.
13 MR. COLLINS: Go ahead.
14 FURTHER EXAMINATION
15 BY MR. DICKIESON:
16 Q. You testified that you destroyed
17 your documents some time in early 2019.
18 My question is, what was the thing
19 that caused you on that date to destroy those
20 documents?
21 A. The fact that I had personal
22 information on there concerning my husband's

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1 medical records. And on other boards that I
2 serve on.
3 It was, it should not be used in
4 this environment.
5 Q. Were you told that it could be used
6 in this environment at that time?
7 A. No.
8 Q. This is just something that popped
9 into your head that I have got documents that
10 could be used in litigation so I better get rid
11 of them?
12 MR. COLLINS: Objection to the form.
13 THE WITNESS: It didn't pop into my
14 head. Any person, you or anyone, who had
15 that information would not want it out there.
16 It was commingled with different things.
17 BY MR. DICKIESON:
18 Q. You had that same commingling in
19 2018, though, but you didn't destroy them then.
20 My question is, what caused you to
21 destroy them in early 2019?
22 MR. COLLINS: Objection to the form.

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1 THE WITNESS: The realization that
2 someone could get my personal notes. That
3 related to my family.
4 BY MR. DICKIESON:
5 Q. And so what caused that personal
6 realization?
7 A. I mean, what -- I don't know what
8 you are wanting me to say.
9 It was not divine providence.
10 Q. Okay.
11 A. I am a private person. And I didn't
12 want those records out there.
13 MR. SCHERTLER: Did you discuss it
14 with a lawyer to get advice?
15 MR. COLLINS: You can answer that
16 yes or no.
17 THE WITNESS: Yes.
18 MR. SCHERTLER: To get advice as to
19 whether it would be proper or not.
20 THE WITNESS: Yes.
21 MR. SCHERTLER: And can you tell us
22 who you discussed it with.

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1 THE WITNESS: My personal lawyer.
2 MR. SCHERTLER: And what is that
3 person's name?
4 THE WITNESS: I choose to not say.
5 MR. SCHERTLER: Well, that is not
6 privileged, so you have to say.
7 MR. COLLINS: Yeah, if you know, you
8 would have to give him the name. Not the
9 substance of anything you talked about. But
10 the name.
11 THE WITNESS: Ray Smith.
12 MR. SCHERTLER: Did he advise you to
13 destroy all of these documents.
14 MR. COLLINS: Objection. That gets
15 into the substance. That is your personal
16 privilege, though, that is not the NRA, so
17 you decide what you want to do with that.
18 THE WITNESS: He did not.
19 MR. SCHERTLER: He did not advise
20 you to destroy the documents.
21 THE WITNESS: He did not.
22 MR. SCHERTLER: Did he advise you to

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1 preserve the documents.
2 THE WITNESS: No.
3 MR. COLLINS: Objection, okay --
4 MR. SCHERTLER: Excuse me?
5 MR. COLLINS: I just want to make
6 sure she understands.
7 MR. SCHERTLER: She has already
8 answered, Mike.
9 MR. COLLINS: She should wait a
10 second. All I'm saying is, it is your
11 personal privilege, you decide what you want
12 to do with it.
13 MR. SCHERTLER: This is a speaking
14 objection. She is --
15 MR. COLLINS: It is on privilege.
16 MR. SCHERTLER: You have already
17 discussed that with her. She has already
18 made her decision.
19 When I asked her did he advise her
20 to destroy the documents, she said no.
21 Privilege waived.
22 My next question is, did he, did he

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1 tell you to preserve the documents.
2 MR. COLLINS: You can answer that if
3 you want to.
4 THE WITNESS: He did not.
5 MR. SCHERTLER: So, he didn't tell
6 you to preserve them. And he didn't tell you
7 to destroy them?
8 THE WITNESS: That's correct.
9 MR. SCHERTLER: What advice did he
10 give you?
11 MR. COLLINS: Okay. Again, I'm only
12 saying that is your choice, whether you want
13 to divulge that.
14 MR. SCHERTLER: What advice did he
15 give you?
16 THE WITNESS: He said it was up to
17 me.
18 MR. SCHERTLER: Okay.
19 BY MR. DICKIESON:
20 Q. What prompted you to go to Ray
21 Smith --
22 MR. COLLINS: No, no, that is it.

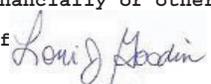
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1 BY MR. DICKIESON:
2 Q. -- at that time.
3 MR. COLLINS: No, this is abusive.
4 You have already finished your questions.
5 You don't get to go back again, that doesn't
6 happen.
7 MR. DICKIESON: I didn't say I was
8 finished.
9 MR. COLLINS: Wait, wait, you
10 weren't finished but he went ahead?
11 MR. DICKIESON: You can look at the
12 record.
13 MR. COLLINS: How many questions do
14 you have, just sincerely.
15 MR. DICKIESON: It depends on her
16 answer.
17 MR. COX: She has already asked and
18 answered what prompted her.
19 MR. DICKIESON: Okay, two questions.
20 MR. COLLINS: Sure.
21 BY MR. DICKIESON:
22 Q. What prompted you to talk to

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1 Mr. Smith about your documents?
2 A. He is a lawyer. He is good. He is
3 a personal friend. And, we were having dinner.
4 The subject of the NRA came up. And
5 in a very casual conversation I asked him that.
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]?
10 A. No.
11 MR. COLLINS: I'm just going to
12 object to the form. I don't think that was
13 her testimony, but, go ahead.
14 MR. DICKIESON: Okay, no further
15 questions.
16 MR. COLLINS: No, no further
17 questions at this time. We are we are going
18 to mark this confidential under the terms of
19 the protective order.
20 (Whereupon, signature not having been
21 waived, the deposition concluded at 6:53 p.m.)
22 * * *

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1 CERTIFICATE OF COURT REPORTER
2 UNITED STATES OF AMERICA)
3 DISTRICT OF COLUMBIA)
4 I, LORI J. GOODIN, RPR, CLR, CRR, the
5 reporter before whom the foregoing deposition was
6 taken, do hereby certify that the witness whose
7 testimony appears in the foregoing deposition was
8 sworn by me; that the testimony of said witness
9 was taken by me in machine shorthand and
10 thereafter transcribed by computer-aided
11 transcription; that said deposition is a true
12 record of the testimony given by said witness;
13 that I am neither counsel for, related to, nor
14 employed by any of the parties to the action in
15 which this deposition was taken; and, further,
16 that I am not a relative or employee of any
17 attorney or counsel employed by the parties
18 hereto, or financially or otherwise interested in
19 the outcome of 
20 LORI J. GOODIN, RPR, CLR, CRR, RSA
21 Notary Public in and for the
22 District of Columbia
My Commission expires: May 14, 2021

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1 DEPOSITION ERRATA SHEET
2 Our Assignment No. 2020-81572
3 Case Caption: National Rifle Association of
4 America V. Ackerman McQueen
5
6 DECLARATION UNDER PENALTY OF PERJURY
7
8 I declare under penalty of perjury
9 that I have read the entire transcript of
10 my Deposition taken in the captioned matter
11 or the same has been read to me, and
12 the same is true and accurate, save and
13 except for changes and/or corrections, if
14 any, as indicated by me on the DEPOSITION
15 ERRATA SHEET hereof, with the understanding
16 that I offer these changes as if still under
17 oath.
18 Signed on the ____ day of
19 _____, 20__.
20
21 _____
22 Carolyn Meadows

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1 DEPOSITION ERRATA SHEET
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21 SIGNATURE: _____ DATE: _____
22 CAROLYN MEADOWS

1 DEPOSITION ERRATA SHEET
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