

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK - CIVIL TERM - PART 3

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PEOPLE OF THE STATE OF NEW YORK, BY LETITIA  
JAMES, ATTORNEY GENERAL OF THE STATE OF NEW YORK,

Plaintiff,

-against-

INDEX NO.  
451625/20

THE NATIONAL RIFLE ASSOCIATION OF AMERICA,  
WAYNE LAPIERRE, WILSON PHILLIPS, JOHN FRAZER,  
and JOSHUA POWELL,

Defendants.  
-----

JURY TRIAL  
60 Centre Street  
New York, New York  
January 29, 2024

BEFORE: HONORABLE JOEL M. COHEN,  
Justice, and a jury

APPEARANCES:

STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL LETITIA JAMES  
Attorneys for the Plaintiff  
28 Liberty Street  
New York, New York 10005  
BY: MONICA A. CONNELL, ESQ.  
EMILY STERN, ESQ.  
STEVEN SHIFFMAN, ESQ.  
ERIN KANDEL, ESQ.  
STEPHEN THOMPSON, ESQ.  
JONATHAN CONLEY, ESQ.  
WILLIAM WANG, ESQ.

BREWER, ATTORNEYS & COUNSELORS  
Attorneys for the Defendant - National Rifle Association  
750 Lexington Avenue, 14th Floor  
New York, New York 10022  
BY: SVETLANA M. EISENBERG, ESQ.  
SARAH B. ROGERS, ESQ.  
NOAH PETERS, ESQ.

## Proceedings

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THE COURT: Just to briefly summarize what was off the record, we were talking about Mr. Spray's deposition testimony and the State had asked whether if they decide not to play the portion that had been objected on hearsay grounds with respect to his testimony that he found out -- although it is not entirely clear from the testimony from whom or how -- that certain charges were continuing to occur after the corrected measures were in place, would I have any other parts that I would be sustaining the objection to and the answer is no. That was the only portion that I had considered to. If you're going to take that out, we don't need to get into any further cutting.

MS. CONNELL: Thank you, your Honor.

THE COURT: I do want to -- you know, on the summary evidence letters, maybe I should have them; but everybody is referring to the actual exhibits. I don't see them on NYSCEF. Just so you all know, I look at NYSCEF, not e-mail. So, I don't know whether you're sending things in. I keep my focus on the public record for the most part.

Do I have copies of the proposed exhibits somewhere?

MS. CONNELL: Your Honor, I thought we had filed a notice on NYSCEF, but I will double check and make sure they're filed today.

## Proceedings

1           THE COURT: So you might have filed it in an  
2 original notice. The two letters that went back and forth  
3 did not attach.

4           MS. CONNELL: Right, I don't believe they did, and  
5 I think we sent notices to the defendant; but I'll make sure  
6 it is filed on NYSCEF.

7           THE COURT: When you sent notices to the  
8 defendants, you posted those on NYSCEF?

9           MS. CONNELL: I would have to double check. I  
10 don't want to make a representation --

11          THE COURT: All right, I have a pretty good sense  
12 from the letters, and I want to get to Mr. LaPierre and the  
13 jury; but I do want to make sure I have the actual summary  
14 exhibits that you're intending to use, but we'll talk about  
15 that at a break when -- so, why don't we get to the jury,  
16 then.

17          COURT OFFICER: Your Honor, do you want the witness  
18 up?

19          THE COURT: Yes, thank you. What I would do  
20 without you. I would have no witness is what I would do  
21 without you.

22

23                   (Continued on next page)

24

25

W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 (Whereupon, at this time the witness,  
2 WAYNE LaPIERRE, having been previously duly sworn/affirmed  
3 by the Clerk of the Court, resumed the witness stand and  
4 testified as follows:)

5 MR. CONLEY: Your Honor, we took the binders back  
6 and tried to consolidate everything into one binder that  
7 will be used today and that should be -- yes.

8 THE COURT: So you changed the tab numbers?

9 MR. CONLEY: No.

10 COURT OFFICER: Court ready to receive the jury,  
11 your Honor.

12 All rise, jury entering.

13 (Whereupon, at this time the jury then entered the  
14 courtroom.)

15 THE COURT: Good morning, everyone. Welcome back.  
16 Please have a seat. So, we're going to continue with  
17 Mr. LaPierre's testimony.

18 Sir, do you recognize you're still under oath?

19 THE WITNESS: Yes, sir, your Honor.

20 THE COURT: Okay, Mr. Conley, you may continue.

21 MR. CONLEY: Thank you your Honor.

22 DIRECT EXAMINATION

23 BY MR. CONLEY:

24 Q Good morning, Mr. LaPierre.

25 A Good morning, counselor. Counselor, may I correct --

## W. LaPierre - Plaintiff - Direct/Mr. Conley

1 thinking about one answer I gave last Friday?

2 THE COURT: Mr. LaPierre, you were saying?

3 A Counselor, I was just asking may I correct one answer  
4 that I gave last Friday in thinking about it?

5 Q Yes.

6 A You asked me if Mary Mallus had ever worked for PM, and  
7 I said no, she worked for Carlyle Group. In thinking about it,  
8 I don't know anything about her employment background other than  
9 I know she worked for the Carlyle Group.

10 Q Okay. Thank you, Mr. LaPierre.

11 Last Friday, I asked you a few questions about a  
12 post-employment agreement that the NRA entered into with Woody  
13 Phillips? Do you recall that?

14 A Yes, I do.

15 Q And when I asked you if Mr. Phillips had provided any  
16 consulting services to the NRA after he retired, you testified  
17 he'd worked with donors in terms of keeping up relations in  
18 Texas.

19 Do you recall that testimony?

20 A Yes, I did.

21 Q Do you recall giving sworn testimony in 2020 during the  
22 Attorney General's investigation of the NRA?

23 A I do.

24 Q And you took an oath to tell the truth in that  
25 examination?

## W. LaPierre - Plaintiff - Direct/Mr. Conley

1           A     I did.

2                     MR. CONLEY:  Jesse, if you could please play page  
3           153 lines 4-14.

4           Q     Mr. LaPierre, do you see a transcript question:

5                     "All right, do you know whether or not Mr. Phillips  
6           provided consulting services to the NRA pursuant to this  
7           contract?"

8                     Do you see that?

9           A     Yes, I do.

10          Q     You responded "I -- I know that Woody -- I was not  
11       aware of this, but I know that Woody stayed in touch with --  
12       well, what is the date of this contract?"  "December 31, 2018."

13                     "QUESTION:  As of December 31st, but was signed  
14       much earlier.

15                     "ANSWER:  I do not know after December 31, 2018,  
16       whether he did or whether he didn't.

17          A     Yes.

18          Q     And, Mr. LaPierre, last Friday I asked you a few  
19       questions about Millie Hallow.  Do you recall that?

20          A     I do.

21          Q     In November of 2020, the NRA reported in its Form 990  
22       that Millie Hallow diverted approximately \$41,000 from the NRA;  
23       is that right?

24          A     I believe that's correct.

25          Q     She took this money without the NRA's permission;

## W. LaPierre - Plaintiff - Direct/Mr. Conley

1 correct?

2 A Yes.

3 Q She stole it; right?

4 A Yes.

5 Q Part of the \$41,000 that Ms. Hallow repaid the NRA were  
6 expenses for her son's wedding; is that accurate?

7 A Yes.

8 Q Those weren't the only expenses; correct?

9 A Those were the ones that I was aware of, unless there  
10 was something involving the -- the Russia trip that she worked  
11 on that I was not aware of.

12 Q Ms. Hallow remained an employee at the NRA until 2023;  
13 is that right?

14 A Yes, that's correct.

15 Q Up until Ms. Hallow left the NRA, she had the same job  
16 title; correct?

17 A She did, although it was being looked at by the lawyers  
18 and the investigation, was being looked at.

19 Q And she had the same salary?

20 A Yes.

21 Q What was her salary?

22 A I think it was 250 or something like that.

23 Q When you learned that Ms. Hallow diverted money from  
24 the NRA, you believe that if she paid the money back, no  
25 disciplinary action was necessary; correct?

## W. LaPierre - Plaintiff - Direct/Mr. Conley

1           A     She paid the money back. It was already with lawyers  
2 and the investigators. Her lawyers believed what she had  
3 cancer, she had breast cancer, she had leukemia; and she thought  
4 she might attempt to pay it back earlier and it got hung up with  
5 the lawyers and eventually she was let go.

6           Q     But back in 2020 when you learned that Ms. Hallow  
7 diverted money from the NRA; you believed that if she paid that  
8 money back, no disciplinary action was necessary; is that  
9 accurate?

10          A     Not necessarily. It was -- it was with the lawyers at  
11 that point, and she did -- she didn't come into the office  
12 anymore. At some point, I decided that she wasn't worth what  
13 she was being paid in terms of services even if she had come  
14 back and I let her go.

15          Q     Mr. LaPierre, do you remember being deposed in the NRA  
16 bankruptcy proceeding?

17          A     Yes, I do.

18          Q     And you took an oath to tell the truth in that  
19 deposition; is that right?

20          A     Yes, I did.

21          Q     And you tried to tell the truth?

22          A     Yes.

23                   MR. CONLEY: Jesse, could you please pull up  
24 Mr. LaPierre's bankruptcy deposition, page 206, line 7 to  
25 23.



## W. LaPierre - Plaintiff - Direct/Mr. Conley

1 (Displayed)

2 Q So, if you see the question here, Mr. LaPierre, at line  
3 7:

4 "So you never went -- did you ever go back to  
5 Millie and say that you lied to me about whether you spent  
6 the NRA money on your son's wedding?"

7 You responded: "ANSWER: You know, she since then  
8 has been coping with, as I said, recovering for a second  
9 time from cancer. Her husband's been terribly sick and has  
10 passed away, and I didn't go back and beat her up on that.  
11 I let -- I let the fact that we told her you're either going  
12 to pay this back or you're going to be fired, and she agreed  
13 to pay it back. I mean, I thought that sent the message  
14 enough."

15 A Yes, that's true.

16 Q And 2020, you discussed this issue with the NRA board  
17 officers at the time; is that right?

18 A Yes.

19 Q And at the time that was Ms. Meadows, Mr. Cotton and  
20 Mr. Lee?

21 A Yes.

22 Q At the time they agreed that repaying the money was  
23 sufficient for Ms. Hallow; is that right?

24 A Yes, but they were -- it was still being looked at.

25 Q Mr. LaPierre, you're aware that the NRA has paid a

## W. LaPierre - Plaintiff - Direct/Mr. Conley

1 vendor for helicopter services for several years; correct?

2 A Yes.

3 Q And you authorized this?

4 A Yes.

5 Q And these helicopters would transfer you and other NRA  
6 executives and board members to and from Nascar races; is that  
7 right?

8 A Yes.

9 Q To avoid getting stuck in traffic, correct?

10 A Yes.

11 MR. CONLEY: I'd like to introduce what is Tab 130  
12 and in your binder, which is Plaintiff's Exhibit 754.

13 And this has not been admitted. I would move for  
14 its admission.

15 MS. ROGERS: Subject to foundation, no objection.

16 THE COURT: This one where there's a foundation  
17 from the vendor or you're going to lay the foundation with  
18 this witness?

19 MR. CONLEY: I will attempt to lay the foundation  
20 with this witness, your Honor.

21 THE COURT: Okay.

22 Q Mr. LaPierre, you said that you were aware that the NRA  
23 had engaged a vendor for helicopter services; is that right?

24 A Yes, yes. I wasn't sure whether we were paying for it  
25 or Speedway Motor Sport.

## W. LaPierre - Plaintiff - Direct/Mr. Conley

1 Q Are you familiar with the vendor, Henry Aviation?

2 A Yes, I am.

3 Q And you're aware that Henry Aviation has provided  
4 services to the NRA?

5 A Yes.

6 Q And Lisa Supernaugh, you're familiar with her; correct?

7 A Yes.

8 Q She has worked -- she worked in the treasurer's office  
9 for several years?

10 A That's correct.

11 Q And was Woody Phillips' assistant for several years?

12 A Yes.

13 Q And Ms. Supernaugh would often handle vendor invoices  
14 for processing purposes; correct?

15 A Yes.

16 MR. CONLEY: Your Honor, I move for admission.

17 THE COURT: Well, I don't know how that has  
18 furthered the foundation for this particular piece of paper,  
19 though. I mean, somebody has to be able to describe what it  
20 is; and do you want to see if he recognizes it or something  
21 that he's seen in the NRA files or something like that?

22 Q Mr. LaPierre, do you recognize the exhibit, Plaintiff's  
23 Exhibit 754 at Tab 130?

24 A Yes, I do.

25 Q And what do you recognize it to be?

## W. LaPierre - Plaintiff - Direct/Mr. Conley

1           A     It is a --

2                     THE COURT: Well, just to be clear, the question is  
3 do you recognize it from the business, from your work, not  
4 from just preparing for today.

5                     THE WITNESS: Yes, your Honor. It is a -- it is an  
6 invoice for transportation, helicopter transportation to  
7 Texas Motor Speedway.

8                     THE COURT: I'll admit it.

9           Q     And, Mr. LaPierre, you would agree that the listed  
10 passengers for this helicopter service invoice is Tony Makris,  
11 Werner Laughlin, you and Terry Sterner; is that right?

12           A     Yes.

13           Q     And Werner Laughlin, that's Tony Makris's wife;  
14 correct?

15           A     Yes.

16           Q     And Terry Sterner, that is Colleen Sterner's husband;  
17 correct?

18           A     Yes.

19           Q     And you authorized this trip; is that right?

20           A     Yes.

21                     MR. CONLEY: I would like to turn to Tab 131,  
22 Plaintiff's Exhibit 776. This is not in evidence. I would  
23 move for its admission.

24                     MS. ROGERS: No objection.

25                     THE COURT: Okay, it's admitted.

## W. LaPierre - Plaintiff - Direct/Mr. Conley

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(Plaintiff's Exhibit 776 was admitted and received

3

into evidence.)

4

Q Mr. LaPierre, do you have Tab 131 in front of you?

5

A Yes, I do.

6

Q And would you agree that these are helicopter charters

7

for Kayne Robinson?

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A Yes.

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Q And did you authorize Kayne Robinson to use

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helicopters?

11

A I -- I don't know whether someone came to me for a

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specific authorization on this, but it was a practice to get

13

people out there.

14

Q And Kayne Robinson is on the Executive Council, is that

15

right?

16

A Yes.

17

MR. CONLEY: And, finally, I'd like to introduce

18

Plaintiff's Exhibit 789, which is not in evidence. That's

19

Tab 132 in your binder. I would move for its admission.

20

MS. ROGERS: No objection.

21

THE COURT: All right, it is admitted.

22

(Plaintiff's Exhibit 789 was admitted and received

23

into evidence.)

24

Q Mr. LaPierre, would you agree this is another invoice

25

for helicopter services for Kayne Robinson?

## W. LaPierre - Plaintiff - Direct/Mr. Conley

1 A Yes, I would.

2 Q And is Donna Kayne Robinson's wife?

3 A That's correct.

4 Q Mr. LaPierre, in addition to the trips that you've  
5 taken with the McKenzies, you've also met with Mr. McKenzie on  
6 numerous occasions in California; is that correct?

7 A Yes, it is.

8 Q Mr. LaPierre, I'd like to turn to Tab 59 of your  
9 binder, Plaintiff's Exhibit 360. This is already in evidence.

10 And --

11 A Tab 59, I'm sorry?

12 Q Yes.

13 A Yes.

14 Q Great. And this is an e-mail from Murray Drechsler to  
15 Craig Spray with attachment titled "MMP Group Retainer  
16 Increases." And Murray Drechsler, he's the CFO of MMP; is that  
17 right?

18 A Yes.

19 Q I'd like to ask a few questions about what's on page 5  
20 of this exhibit, which is fee schedules that are listed. Do you  
21 see that in front of you?

22 A I do.

23 Q And you see the headings for "Membership Marketing  
24 Partners, Allegiance Creative and Concord?"

25 A Yes, I do.

**W. LaPierre - Plaintiff - Direct/Mr. Conley**

1 Q And you'd agree that the monthly fees reflected on  
2 page 5, they increased numerous times from 2011, 2018; correct?

3 A Yes.

4 Q Now, you've previously testified that you had no role  
5 in negotiating the fees with MMP entities; correct?

6 A Yes. Although I -- I was consulted on extra work they  
7 were taking on.

8 Q The negotiation of the fees was handled by the  
9 treasurer's office; is that right?

10 A Yes.

11 Q And it's your testimony that you didn't verbally  
12 approve any fee increases for the MMP entities; correct?

13 A I approved the -- I said it was a good idea that I  
14 thought to take on the additional work, and they should talk to  
15 the treasurer's office in terms of the fees.

16 Q Mr. LaPierre, I'd like to turn to Tab 60 in your  
17 binder, which is Plaintiff's Exhibit 2824.

18 MR. CONLEY: This is not in evidence and I move for  
19 its admission.

20 MS. ROGERS: No objection.

21 THE COURT: Hearing no objection, it's admitted.

22 (Plaintiff's Exhibit 2824 was admitted and received  
23 into evidence.)

24 Q And you can take a moment to flip through this.

25 Mr. LaPierre, but my question is would you agree this

## W. LaPierre - Plaintiff - Direct/Mr. Conley

1 is a collection of expense reports you submitted for a trip to  
2 California between May 27th and May 30, 2015?

3 A That is correct, to do a town hall meeting.

4 Q Would it be accurate to say you met with Mr. McKenzie  
5 several times during this trip; correct?

6 A Yes.

7 Q So, for example, if you turn to 4 four of this exhibit  
8 at the top, this is an expense report for a meal that you had  
9 with the McKenzies; correct?

10 A Yes.

11 Q And you previously testified about your use of the  
12 Yacht Illusions, correct?

13 A Yes.

14 Q And on several occasions Susan LaPierre used the Yacht  
15 Illusions on trips with friends, correct?

16 A Yes.

17 Q And one of those trips on the Yacht Illusions occurred  
18 the last week of May 2015; correct?

19 A I'm -- I'm not sure, but...

20 Q That's fair. That was a few years ago.

21 I'd like to see if a document produced by Associated TV  
22 would refresh your recollection. If you could please turn to  
23 Tab 49, Plaintiff's Exhibit 65.

24 MR. CONLEY: And this is not in evidence.

25 MS. ROGERS: We'll need to see a foundation.



**W. LaPierre - Plaintiff - Direct/Mr. Conley**

1 MR. CONLEY: I'm not seeking to admit it quite yet.

2 THE COURT: You just want him to look at it and see  
3 if it refreshes his memory?

4 MR. CONLEY: Correct, your Honor.

5 Q If you could turn to Tab 49, Mr. LaPierre, page 3.

6 A Yes, I'm there right now.

7 Q Does this refresh your recollection on whether  
8 Ms. LaPierre stayed on the Illusions Yacht in the Bahamas in May  
9 of 2015?

10 A Yes, it does.

11 Q And on what dates did Ms. LaPierre stay on the Yacht  
12 Illusions?

13 A It looks like the 24th through the 30th.

14 Q Thank you. And now turning back to the chart of MMP's  
15 fees which is Tab 59 in your binder.

16 A Yes.

17 Q On page 6. You'd agree that MMP's fees increased from  
18 \$575,000 a month to 645,000 a month in June of 2015; correct?

19 A Yes.

20 Q And Concord Social's monthly fees increased by 30,000  
21 at the same time?

22 A Yes.

23 Q So, a few days after your trip to California to meet  
24 with Mr. McKenzie and shortly after, Ms. LaPierre stayed on the  
25 McKenzie's yacht for a week, MMP's fees increased a hundred

**W. LaPierre - Plaintiff - Direct/Mr. Conley**

1 thousand a month; correct?

2 A Yes, but I don't believe they had anything to do with  
3 each other.

4 Q And isn't it accurate that you spent a week with the  
5 McKenzies in the Bahamas between December 29th and January 5th,  
6 for one of their retreats in 2016?

7 A That -- that sounds correct. Could you show me that?

8 Q Yes, Mr. LaPierre. If we could please turn to Tab 61  
9 in your binder, which is Plaintiff's Exhibit 4705.

10 A Yes.

11 MR. CONLEY: And this is not in evidence, but I  
12 would move for its admission.

13 MS. ROGERS: Subject to foundation, no objection.

14 THE COURT: Is this one that has been -- is this  
15 part of the --

16 MS. ROGERS: I think this is part of the GS-2  
17 production, but we would want the witness to at least be  
18 voir dired on whether -- I don't want to say more in front  
19 of the jury -- whether this is a real invoice or a not real  
20 one.

21 THE COURT: Well, look, the admission of it is as a  
22 business record of the vendor and so I'm admitting it on  
23 that basis. Whether if the witness -- if you or the other  
24 side wants to ask the witness whether it is real or not, you  
25 can certainly do that.

1                   So, it is admitted.

2                   (Plaintiff's Exhibit 4705 was admitted and received  
3 into evidence.)

4                   MR. CONLEY: Thank you, your Honor.

5           Q       Mr. LaPierre, do you have the invoice from Corporate  
6 America Aviation in front of you?

7           A       Yes, I do.

8           Q       Would you agree that it reflects a trip on December 29,  
9 2015, from Washington DC to the Bahamas?

10          A       Yes, this is a celebrity retreat that I used to attend  
11 to try to get celebrities.

12                   (Continued on next page)

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**W. LaPierre - by Plaintiff - Direct/Mr. Conley**

1 MR. CONLEY: If you can please turn to Tab 62 in  
2 your binder. It's Plaintiff's Exhibit 4444, and this is not  
3 in evidence. I move for its admission.

4 THE COURT: Is this the same foundation from the  
5 vendor?

6 MR. CONLEY: Yes.

7 THE COURT: It's admitted.

8 Q And Mr. LaPierre, would you agree this reflects a  
9 private flight from the Bahamas to Dallas and then Washington DC  
10 in January 4th and 5th, 2016?

11 A Yes. It's back from the Celebrity retreat to Dallas  
12 the club and Wetherby Association dinner in Texas.

13 Q And so isn't it true that you spent a week with the  
14 McKenzies in the Bahamas between December 29 and January 4 for  
15 one of their retreats in 2016?

16 A Yes. That's correct.

17 Q And if we could turn back to the MMP retainer fees  
18 chart, Tab 59 in your binder, Page 6. It's on the screen, if  
19 that's easier.

20 Mr. LaPierre, will you agree that MMP's fees increased  
21 \$100,000 in this time that coincided with your week-long stay  
22 with the McKenzies in the Bahamas?

23 A Yes, I would, but Counselor, all of this is a part of  
24 an investigation Greg Spray our new treasurer was doing as to  
25 whether the increases in -- from MMP were justified. It was

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 part of an investigation he was doing.

2 Q Okay. And sitting here right now, do you have a view  
3 on whether the fees were justified?

4 A He concluded they were.

5 Q And Mr. LaPierre, I'd like to turn to Tab 63 of your  
6 binder which is Plaintiff's Exhibit 5114.

7 A Yes.

8 MR. CONLEY: And this is not in evidence. I move  
9 for its admission.

10 MS. ROGERS: Subject to foundation, no objection.

11 THE COURT: These are documents that were produced  
12 by who?

13 MS. ROGERS: These were produced by us. I'm not  
14 sure if the witness --

15 MR. CONLEY: The NRA.

16 THE COURT: All right. You can ask.

17 Q Mr. LaPierre, do you recognize Plaintiff's Exhibit  
18 5114?

19 A Yes, I do.

20 Q Are these expense reports that you submitted for a trip  
21 to California in 2016?

22 A Yes.

23 MR. CONLEY: I move for their admission.

24 MS. ROGERS: No objection.

25 THE COURT: They are admitted.

**W. LaPierre - by Plaintiff - Direct/Mr. Conley**

1 Q So Mr. LaPierre, you'd agree this is a collection of  
2 your expense reports for a trip that you took to California  
3 between August 29 and September 2, 2016; correct?

4 A Yes, I would.

5 Q And you met with the McKenzies during this period;  
6 correct?

7 A I did.

8 Q If you could turn to page 10. At the top there is an  
9 entertainment report.

10 Do you see that?

11 A Yes, I do.

12 Q And this is an expense report for a meal on August 31,  
13 2016 with David and Laura McKenzie and Brad O'Leary; correct?

14 A That is correct.

15 Q And if you turn to Page 16 of this exhibit, would you  
16 agree that this is an expense report for your hotel room at the  
17 Beverly Hills Hotel for this trip?

18 A Sir, on page 16?

19 Q Yes.

20 A Pardon me.

21 Q Page 16.

22 A Yes.

23 Q And will you agree you write on this expense report  
24 that the stay for meetings with Associated TV, Membership  
25 Marketing Partners and PM Consulting?

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 A Yes.

2 Q All right. And if you turn to page 20 of this exhibit,  
3 will you agree that this is an expense report for another meal  
4 with David and Laura McKenzie on September 1, 2016?

5 A Yes.

6 Q All right. And I'd like to again turn back to the  
7 chart of the MMP retainer fees, Tab 59, Plaintiff's Exhibit 360.

8 Do you see the MMP fees increased \$150,000 a month  
9 beginning on September 1, 2016?

10 A Yes.

11 Q And Concord's fees increased 40,000 a month at the same  
12 time; correct?

13 A Yes.

14 Q So based on the chart of the MMP retainer fees and the  
15 expense reports that we are looking at, once again MMP's and  
16 Concord's fees increased substantially around the same time that  
17 you met with the McKenzies.

18 A Yes, but I don't think they had anything to do with  
19 each other.

20 Q You're familiar with Mike Marcellin; correct?

21 A Yes.

22 Q He was the NRA managing director of Affinity and  
23 licensing?

24 A Yes. That's correct.

25 Q He retired in 2016?

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 A I believe so.

2 Q The NRA paid Mr. Marcellin more than \$2.5 million after  
3 he retired; correct?

4 A I'm not aware of the numbers.

5 Q Are you aware that the NRA paid Mr. Marcellin after he  
6 retired?

7 A I am now.

8 Q And Mr. Marcellin didn't provide any services to the  
9 NRA for those payments; correct?

10 A I don't know. He didn't report to me.

11 Q Who did Mr. Marcellin report to?

12 A He reported to our treasurer's office. He may have  
13 reported to membership at one point. I know he reported to our  
14 treasurer's office.

15 Q So that would be Woody Phillips?

16 A Yes. That's correct.

17 Q And are you aware that after Mr. Marcellin retired,  
18 approximately a million dollars was paid to Mr. Marcellin  
19 through NRA vendor Lockton Affinity?

20 A I did not know that at the time. I know that now as a  
21 result of the 360 degree course correction.

22 Q Would you agree that was inappropriate?

23 A Yes.

24 Q When Mr. Marcellin worked at the NRA, he managed the  
25 NRA's relationship with Lockton Affinity; right?



## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1           A     Yes.

2           Q     Will you agree that Mr. Marcellin's arrangement with  
3 Lockton Affinity should have been disclosed to the Audit  
4 Committee?

5           A     Yes.

6           Q     And to your knowledge, it wasn't disclosed to the Audit  
7 Committee; correct?

8           A     Not that I know of.

9           Q     Last Friday I asked you some questions about Ackerman  
10 McQueen's practice of passing through expenses to the NRA's  
11 out-of-pocket expenses.

12                     Do you recall that?

13           A     Yes, I do.

14           Q     I'd like to turn to Tab 100 in your binder, Page 287.  
15 This is an extract of the full exhibit because these are several  
16 hundred pages long. I know it could be a little unwieldy  
17 flipping through them, so this is just an extract. If you want  
18 the full exhibit in hard copy, I'm happy to provide that for  
19 you. And the specific page I'm asking about is 287.

20                     THE COURT: Is this document in evidence yet?

21                     MR. CONLEY: Yes. Thank you, your Honor. Yes,  
22 this is in evidence.

23           Q     And do you see the line items on this Ackerman McQueen  
24 expense report for \$29,786 and \$7,550 for 21C, Louisville?

25           A     Yes, I do.

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q And for those line items, it says underneath 21C,  
2 Louisville, "NR guest lodging confidential per WLP."

3 "WLP." Those are your initials; correct?

4 A Yes, they are.

5 Q And people refer to you by those initials pretty  
6 frequently; correct?

7 A No, not really. They refer to me as Wayne.

8 Q But in documents, would it be fair this reference to  
9 WLP is referring to you?

10 A I know looking at these that's the way Mr. Makris used  
11 to put it down.

12 Q Okay. And Ackerman booked this lodging for you;  
13 correct?

14 A No. I believe they were booked by Mrs. Stanford. I'm  
15 not sure.

16 Q And did Ms. Stanford book this lodging for you?

17 A I'm not sure. It was for a national convention, and it  
18 could have been a combination of the two. I'm not sure is the  
19 answer.

20 Q Okay. So you don't know one way or the other whether  
21 this "guest lodging confidential per WLP" were rooms booked on  
22 your behalf?

23 A I know about this now. I do not believe a lot of these  
24 charges were mine. I believe they were Ackerman's. That's what  
25 I believe. I believe at least half of them were Ackerman's.

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q What about the other half?

2 A They would have been mine.

3 Q So a portion of these expenses were for you; correct?

4 A Yes.

5 Q And Ackerman billed the NRA for these hotel expenses  
6 through the out-of-pocket arrangement; correct?

7 A Yes.

8 Q Last Friday I asked you a few questions about Tony  
9 Makris.

10 Do you recall that?

11 A Yes.

12 Q Mr. Makris is a close friend of yours for decades;  
13 right?

14 A Yes.

15 Q In 2018, Mr. Makris accompanied you on two trips to the  
16 Mayo Clinic in Arizona; correct?

17 A Yes. That's correct.

18 Q And you asked Mr. Makris to join you?

19 A Yes. He joined me because they thought I had lung  
20 cancer and my wife could not go. So he joined me.

21 Q And during these trips, you both stayed at the Four  
22 Seasons in Scottsdale, Arizona; correct?

23 A Yes. That's correct.

24 Q And the NRA paid for both you and Mr. Makris' rooms;  
25 correct?

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 A Yes. I know that now.

2 Q I'd like to turn to Tab 102 in your binder which is  
3 Plaintiff's Exhibit 3150.

4 Again, for convenience, this is just an extract from  
5 the exhibit. I'd like to turn -- and this is in evidence. I'd  
6 like to turn to Page 82.

7 A Yes. I found it.

8 Q Okay. Great. And I'd like to direct your attention on  
9 Page 82 to a charge for lodging at the Four Seasons Hotel in  
10 January of 2018 in Scottsdale, Arizona. The charge is for  
11 \$4,753.28 cents.

12 Do you see that?

13 A Yes, I do.

14 Q This reflects the lodging expenses for one of the trips  
15 that you took to Arizona with Mr. Makris; correct?

16 A Yes. That's correct.

17 Q And these were the charges for your and Mr. Makris'  
18 rooms?

19 A Yes.

20 Q And this was billed through Ackerman McQueen as an  
21 out-of-pocket expense; correct?

22 A Yes. That's correct.

23 Q Okay. If you could turn to Page 244. Same exhibit.

24 A Yes. I'm with you.

25 Q And I'd like to direct your attention to the third

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 charge up from the bottom dated April 19, 2018. It's a charge  
2 from the Four Seasons Scottsdale Hotel for \$9,550.42.

3 Do you see that?

4 A Yes, I do.

5 Q This reflects a lodging expense at the Four Seasons  
6 Hotel for the second trip that you took to Arizona with Mr.  
7 Makris; correct?

8 A Yes. I believe --

9 Q And these expenses are for your and Mr. Makris' hotel  
10 room during that stay?

11 A Yes.

12 Q The NRA also paid for your private jet travel for these  
13 two trips to Arizona in 2018; correct?

14 A Yes, I was told by security whether it was personal or  
15 business, I had to travel private.

16 Q You testified last Friday that you didn't recall any  
17 instances when you authorized a private flight for Mr. Makris  
18 where you were not a passenger.

19 Do you recall that testimony?

20 MR. CORRELL: Objection, your Honor. Misstates the  
21 testimony.

22 A I said there might have been one or so where I was on  
23 the plane and he had to be dropped off somewhere else and  
24 authorize that.

25 Q And the instance that you're referring to, was this a

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 separate flight or was it the same flight that you were on that  
2 just continued?

3 A It was the same flight.

4 Q I would like to introduce Plaintiff's Exhibit 4538.  
5 This is not it in your binder, but I do have paper  
6 copies.

7 THE COURT: Is it in evidence?

8 MR. CONLEY: It is not in evidence.

9 THE COURT: Does counsel have copies?

10 MS. ROGERS: I'd like one. Subject to the same  
11 foundation with hearsay objection, no objection.

12 THE COURT: Again, is this part of the collection  
13 that were attested to by the vendor?

14 MR. CONLEY: Yes.

15 THE COURT: It's admitted. So you do have it on  
16 the screen. Okay.

17 Q Mr. LaPierre, would you agree that this invoice  
18 reflects a private flight that you arranged for Mr. Makris after  
19 he joined you on the trip to Arizona?

20 A I did not authorize this flight -- this flight back.

21 Q And this flight was \$35,800; correct?

22 A That's correct.

23 Q And the passengers listed are Tony Makris and his wife;  
24 correct?

25 A Yes. I do not believe I authorized this flight.

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q Ackerman McQueen would also pay for your meals at  
2 restaurants and pass those through to the NRA's out-of-pocket  
3 expenses; right?

4 A They may have at some times.

5 Q You're familiar with Landini Brothers; correct?

6 A Yes.

7 Q It's an Italian restaurant in Alexandria, Virginia?

8 A Yes.

9 Q And you have dined there several occasions; right?

10 A Yes.

11 Q And you've dined there with Tony Makris?

12 A That's correct.

13 Q And when you dined at Landini's with Tony Makris or  
14 someone else from Ackerman, Ackerman would often pick up the  
15 bill; correct?

16 A Yes. It would often be a working lunch, and they would  
17 pick it up sometimes.

18 Q I'd like to turn to Tab 100, Plaintiff's Exhibit 3151.  
19 This is in evidence at page 321.

20 A Yes, sir. I'm with you.

21 Q And I'd like to direct your attention -- first, let's  
22 start at the top.

23 Do you see this is an expense report for Jeff Minson  
24 and below that it says "TM July travel."

25 Do you see that?

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 A I'm sorry. Where are you, Counselor?

2 Q If you look at the top. Do you see expense report  
3 listed?

4 A LA Homes?

5 THE COURT: They are circling it on the version  
6 that's on your screen, Mr. LaPierre.

7 THE WITNESS: Yes.

8 Q Okay. Great. And below that, do you see descriptions  
9 for Landini brothers and Landini Rex?

10 A Yes, I do.

11 Q And "TM meal." Do you understand that to mean Tony  
12 Makris?

13 A Yes, I do.

14 Q Okay. And so for example, on June 7, 2016, you see a  
15 reference TM meal with WLP part of \$2,140.64?

16 A Yes.

17 Q The cost of that meal is \$129.58?

18 A Yes.

19 Q And below that do you see a description for Landini Rex  
20 and TM meal with WLP and then other initials?

21 A Yes, I see that.

22 Q Okay. And that meal was approximately \$1,000. Do you  
23 see that?

24 A Yes, I do.

25 Q And if you go down, you'll see meals for June 19, June



## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 20, June 21, and 22.

2           Would you agree that this invoice lists meals that you  
3 had at Landini's five times in five days?

4           A     I did not believe that I was at most of these. I  
5 occasionally attended a working dinner at this place called Rex,  
6 but I didn't drink. I didn't smoke. I hated that cigar bar. I  
7 hated going to that cigar bar, and I did not believe I was part  
8 of most of these meetings.

9           Q     Okay. But when you would dine with Tony Makris, there  
10 were instances when he would be picking up the bill for you at  
11 Landini's; right?

12          A     That is correct. At the restaurant and occasionally, I  
13 went to a working dinner at the Rex Cigar Bar, but I didn't like  
14 it.

15          Q     And you knew that those expenses would be billed to the  
16 NRA; right?

17          A     I expected Tony to bill his expenses that were on  
18 working business with the NRA.

19                 For example, if he had -- he attended -- if he -- if he  
20 entertained Navy Seals that were up from Virginia Beach or  
21 something like that.

22          Q     And if it didn't have a business purpose and Mr. Makris  
23 picked up the bill, who did you think would ultimately be paying  
24 for it?

25          A     If it didn't have a working experience -- a purpose,

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 they shouldn't have billed the NRA, and they should have picked  
2 it up.

3 Q Mr. LaPierre, I'd like to turn to Tab 96 which is  
4 Plaintiff's Exhibit 446, and this has been admitted into  
5 evidence.

6 And I'd like to -- I'm sorry about the paperclip there.

7 I'd like to ask you about the letter on Page 4 of the  
8 exhibit which is the last page.

9 A Yes.

10 Q Do you recognize this letter?

11 A Yes, I do.

12 Q It was addressed to you; correct?

13 A Yes, it was.

14 Q And it was sent by Bill Winkler?

15 A Yes, it was.

16 Q You're familiar with the retail company Zegna; correct?

17 A Yes, I am.

18 Q It's a high-end menswear store; is that right?

19 A That's correct.

20 Q In the letter Mr. Winkler refers to clothing purchases  
21 at Zegna store in Beverly Hills and states that due to the  
22 substantial nature of the total, we should address these items  
23 immediately, and it lists out a figure of \$274,695.03.

24 Do you see that?

25 A I do.

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q And accompanying the letter which is on Page 1 and -- 2  
2 and 3 of this exhibit, there are a list of purchases by a date  
3 and amount.

4 MR. FLEMING: Excuse me, your Honor. I don't have  
5 exhibit 446 at Tab 96.

6 Is that the right exhibit number?

7 MR. CONLEY: It is. I sent an email last night.  
8 I replaced Plaintiff 3142 with 446 because they are the same  
9 letter, and this was already admitted into evidence.

10 MR. CORRELL: I don't see the figure that you just  
11 recited in my copy of the exhibit.

12 MR. CONLEY: Sorry for the confusion here.

13 Is this the Winkler letter regarding Zegna store  
14 purchases?

15 MR. FLEMING: Yes, it is.

16 MR. CORRELL: My letter is dated May 6, 2019.

17 THE COURT: I'm not sure you are all on the same  
18 place here.

19 MS. ROGERS: Is this PX 143?

20 THE COURT: Should be PX 446; right? It's Tab 96  
21 in this new --

22 MR. CONLEY: Yeah. I apologize for the confusion.  
23 My --

24 MR. CORRELL: Okay. I see it now.

25 MR. CONLEY: It's also on the screen if that's

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 helpful.

2 Q Okay. So you see on Page 2 and 3 of this exhibit a  
3 list of purchases by date and amount?

4 A Yes, I do.

5 Q Okay. And you shopped at this Zegna store in Beverly  
6 Hills that's referred in this letter; correct?

7 A Yes, I have.

8 Q And you have no reason to doubt the accuracy of the  
9 list of purchases on Page two and 3 of this letter; correct?

10 A I'm not sure about the accuracy. I have never seen the  
11 invoices.

12 Mr. McQueen used to literally beat me up to go get  
13 wardrobe at this store. They tended to do wardrobe for people  
14 that did television. I did literally all the television for the  
15 NRA, and he hated my clothing. He wanted different varieties of  
16 suits, different colors. He wanted -- style changed. He beat  
17 me up, but yes, I would go and get wardrobe for work purposes,  
18 and the bills would go directly to Ackerman McQueen.

19 Q Do you have any reason to doubt the accuracy of the  
20 list of purchases in the letter?

21 A I don't. I just have never seen any invoices.

22 Q And stepping back, I'd like to talk about how this  
23 arrangement would work. This Zegna location is a physical brick  
24 and mortar store in Beverly Hills; is that correct?

25 A That's correct.

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q And you would go to the store and they would make  
2 suggestions; right?

3 A Yes. They would have suits laid out that would be  
4 appropriate for TV. They would be different colors. Some of  
5 them would be light. Some of them would be dark. They would  
6 have types that he thought you would work on TV. I would take a  
7 look at them and go fine and leave.

8 Q And for tailored items, they would take measurements?

9 A Yes, they would.

10 Q And then you would pick what you wanted and the store  
11 would ship those items to you; is that correct?

12 A That's correct. Yes. That's correct.

13 Q And so looking at this list of transactions, in March  
14 of 2014, you spent \$29,060 on a visit to the Zegna store;  
15 correct?

16 A Yes. That looks correct.

17 Q And in September 2014, an additional 15,050.

18 A Yes.

19 Q I'm sorry. I didn't mean to --

20 A I was just going to say that was about the time he  
21 thought the styles had changed, and he wanted me to get a whole  
22 bunch of different suits.

23 Q And in September of 2015, there is another expense for  
24 \$39,000; correct?

25 A Yes. That's correct.

1 Q And when you went shopping at this store, you didn't  
2 pay for the clothes; right?

3 A No. As I said, it was set up by Ackerman McQueen. The  
4 invoices went straight to Ackerman McQueen. I never even saw  
5 any of the invoices. I was just getting wardrobe to go -- they  
6 were literally costumes I wore on TV for the NRA.

7 Q And it was your understanding that Ackerman was picking  
8 up the tab?

9 A Yes, and they told me they didn't see anything wrong  
10 with it, that they considered it appropriate in terms of my role  
11 as the spokesperson for the organization.

12 Q Was Ackerman actually billing those expenses to the  
13 NRA?

14 A No.

15 (Continued on the following page.)  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1

2 Q So they were gifts?

3 A They weren't gifts. They were work items that were  
4 worn by me to do literally hundreds of appearances for the NRA  
5 on TV.6 Q Ackerman McQueen also paid tens of thousands of dollars  
7 for hair and makeup services for your wife, Susan, in connection  
8 with her attendance at NRA events; right?

9 A Yes, that's correct.

10 Q And those were also billed to the NRA's out-of-pocket  
11 expenses right?

12 A Yes, they were.

13 Q You didn't see the invoices for those expenses?

14 A I did not.

15 Q Did you ever ask to see them?

16 A I did not.

17 Q But you knew the services were being provided?

18 A I knew that the Women's Leadership forum luncheon which  
19 was attended by 800, 900 women, that the women had hair and  
20 makeup services. So did the men at theirs.21 MR. CONLEY: I'd like to turn to Tab 101, which is  
22 Plaintiff's Exhibit 3152. This is in evidence. Page 227,  
23 227.

24 Q It is under Tab 101?

25 A Yes.

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q And it is page 227. It is also on the screen, if that  
2 would be easier.

3 (Displayed)

4 A I have it.

5 Q Okay, great.

6 You agree this is an invoice for hair and makeup  
7 services billed to the NRA, right?

8 A Yes, I do.

9 Q And do you see at the top left it says "Bill to NRA  
10 Susan LaPierre?"

11 A Yes, I see that.

12 Q And the balance due for this invoice is \$7,850; right?

13 A Yes, I see that.

14 Q And if you look at the next page, page 228.

15 A Yes.

16 Q This is another invoice for hair and makeup services,  
17 right?

18 A That's correct.

19 Q And there's several line items here in this invoice for  
20 "Full day makeup for Susan LaPierre."

21 Do you see that?

22 A Yes, that's correct.

23 Q At a daily rate of \$1,800?

24 A Yes, I see that.

25 Q And this invoice is for \$10,275; right?



## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1

2 A Yes.

3

4 Q And these invoices are for hair and makeup services  
provided to your wife; right?

5

A Yes, during the Atlanta convention.

6

7 Q Ackerman McQueen also paid Gayle Stanford a flat  
monthly fee and passed that expense through to the NRA as a  
8 out-of-pocket expense; correct?

9

A Yes, Mrs. Stanford charged a fee to the NRA.

10

11 Q But she also received a flat monthly fee from Ackerman  
McQueen; right?

12

A I wasn't aware of that.

13

Q Are you aware of it now?

14

A Yes.

15

16 Q As we covered, the NRA was already paying Ms. Stanford  
a flat monthly fee for her services; right?

17

A Yes, that's correct.

18

19 Q So, you'd agree that Ackerman executives booked lodging  
for you and billed the cost of the lodging to the NRA as  
20 out-of-pocket expenses; correct?

21

A They may have occasionally. Not most of the time.

22

23 Q And you'd agree that Ackerman picked up the bill for  
suits you purchased at a Zegna store in Beverly Hills; is that  
24 correct?

25

A Yes.

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q And you that agree Ackerman picked up the bill for  
2 numerous meals you had at Landini's and billed the cost of those  
3 meals to the NRA as out-of-pocket expenses; right?

4 A Yes, during work lunches.

5 Q And you agree that Ackerman paid for professional hair  
6 and makeup expenses for your wife and passed those expenses to  
7 the NRA as out-of-pocket expenses; correct?

8 A Yes.

9 Q And you agree that Ackerman paid Gayle Stanford a flat  
10 monthly fee and passed that cost to the NRA as an out-of-pocket  
11 expense; correct?

12 A Yes, I know that now.

13 Q Do you agree -- yes or no -- that for the  
14 out-of-pocket arrangement with Ackerman McQueen was an internal  
15 control failure at the NRA?

16 A I think it certainly now was not appropriate given the  
17 360 degree course correction. There were -- it was okay for  
18 Ackerman to pick up certain charges as long as we audit them  
19 every year for security and confidentiality, but this is not a  
20 practice that NRA would do today.

21 Q And in your view, it never should have happened;  
22 correct?

23 A I -- I think it was probably a mistake. I think it was  
24 not anything illegally wrong with it, but I think it was done for  
25 security and confidentiality. I think it's not best practices

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 and it is not happening at the NRA. We ended it.

2 Q You're familiar with Youth for Tomorrow; correct?

3 A Yes, I am.

4 Q It's a charity?

5 A Yes, it is.

6 Q Your wife, Susan LaPierre, is on the board of trustees  
7 at the Youth for Tomorrow?

8 A Yes, she is.

9 Q She joined the board around 2008?

10 A I think that's correct.

11 Q And during her time on Youth for Tomorrow's board, she  
12 also served as the president for several years; correct?

13 A Yes, she sure did.

14 Q And the NRA's been a sponsor for Youth for Tomorrow for  
15 several years; correct?

16 A Yes, they have.

17 Q It sponsored an annual gala for Youth for Tomorrow  
18 called the Heart to Heart Gala?

19 A Yes, it did.

20 Q And you authorized those sponsorship payments; right?

21 A Yes, I did.

22 Q In April of 2019 the NRA Audit Committee approved and  
23 ratified past NRA support for Youth for Tomorrow; right?

24 A Yes, they did some.

25 Q Right. I'd like to turn to Tab 129 of your binder,

**W. LaPierre - by Plaintiff - Direct/Mr. Conley**

1 which is Plaintiff's Exhibit 592 and this is in evidence.

2 And, specifically, I wanted to ask you about pages 19  
3 and 20.

4

5 THE COURT: Are you referring to the exhibit page  
6 numbers or?

7 MR. CONLEY: I'm sorry, no, I'm not. I was  
8 referring to the actual minutes page numbers. Thank you,  
9 your Honor.

10 It is actually pages 10 and 11 of the exhibit.

11 A Yes, I'm with you.

12 Q And so these minutes approved past support for Youth  
13 for Tomorrow financial support of 155,000 in 2015, 170,000 in  
14 2016, and 125,000 in 2018.

15 Do you see that?

16 A Yes, I do.

17 Q And these payments referenced by the Audit Committee  
18 were referred to sponsorship payments made by the NRA for Youth  
19 for Tomorrow Heart to Heart Gala; is that correct?

20 A Yes, that's correct.

21 Q And the various financial support of Youth for Tomorrow  
22 hadn't been limited to those sponsorship payments; correct?

23 A That is correct.

24 Q The NRA also paid entertainment expenses for Youth for  
25 Tomorrow events; right?

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 A Yes.

2 Q Like performances by country music stars?

3 A Yes.

4 Q And these expenses included payments to the performer,  
5 themselves, as well as payments to vendors to provide services  
6 to Youth for Tomorrow?

7 A Yes, that's correct.

8 Q The NRA paid approximately 200, 250,000 a year in these  
9 entertainment expenses; correct?

10 A I think that sounds about right.

11 Q And you authorized those payments, right?

12 A Yes, I did.

13 Q And you did not report those payments to the Audit  
14 Committee before authorizing them; right?

15 A No. Looking back on it, that was a process failure. I  
16 think these -- it was totally appropriate for NRA to do this.  
17 In fact, we're proud of it. It was done for NRA business. We  
18 were good corporate citizen in northern Virginia, and we brought  
19 in a lot of our high donors for these; and I think this helped  
20 the kids a lot and it was a very good thing for the NRA to do.

21 Q Mr. LaPierre, so I'd like to walk you through some of  
22 the payments you authorized for Youth for Tomorrow events. You  
23 authorized payments for Martina McBride to perform at Youth for  
24 Tomorrow event; right?

25 A Yes.

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q And payments to Sarah Evans to perform at Youth for  
2 Tomorrow event?

3 A Yes.

4 MR. FLEMING: Your Honor, if I can interrupt for a  
5 second. It's just been brought to my attention those  
6 numbers are actually from the American Conservative Union,  
7 Section 6, and not from Youth for Tomorrow.

8 Perhaps, Mr. Conley would want to redirect his  
9 attention.

10 MR. CONLEY: I think I cited the correct numbers.

11 MR. FLEMING: I think there's a discrepancy between  
12 the screen and the document.

13 THE COURT: The figures that you're talking about  
14 are not in this document, right? The out-of-pocket  
15 expenses?

16 MS. ROGERS: The out-of-pocket aren't. Some Youth  
17 for Tomorrow figures are; but there's also figures for  
18 unrelated charity there's concern, we're confused.

19 THE COURT: You're talking about -- well. You can  
20 ask the witness fact questions which he's been answering, I  
21 guess.

22 MR. CONLEY: I'm sorry, I think I was asking about  
23 the correct expenditures.

24 THE COURT: Is it your -- do you think that this  
25 document says Martina McBride was at the American

**W. LaPierre - by Plaintiff - Direct/Mr. Conley**

1 Conservative Union meetings?

2 MR. FLEMING: I'm confused as to the numbers. It  
3 appears to me that the witness may have been directed to a  
4 different portion of this document.

5 MS. ROGERS: There's different pagination. We were  
6 talking about page 19, which has dollar figures on it for  
7 American Conservative Union, but the dollar figures for YFT  
8 are on page 20, and I think the correct figures are all on  
9 the screen. There might have been confusion.

10 THE COURT: I'm not sure this is much confusion.  
11 You've moved past the numbers that were in this approval,  
12 and you went on to other kind of numbers that are not in  
13 this document.

14 MR. CONLEY: That's correct, your Honor.

15 THE COURT: Well, as long as you're asking fact  
16 witness questions to the witness, that's what matters most  
17 to me.

18 MR. CONLEY: Okay. Thank you, your Honor.

19 Q So, Mr. LaPierre, I was going through some of the  
20 entertainment expenses that you'd authorized for Youth for  
21 Tomorrow events; and you authorized payments for performance by  
22 Rascal Flats; correct?

23 A Yes.

24 Q And Jay Lenno?

25 A Yes.

**W. LaPierre - by Plaintiff - Direct/Mr. Conley**

1 Q And none of these expenditures were approved by the  
2 Audit Committee; correct?

3 A No, some of them were, but it was a mistake not to  
4 include all of them. They should have all been included in  
5 that.

6 Q So, is it your testimony that the expenditures that the  
7 Audit Committee approved for sponsorship were also going towards  
8 some of these entertainment expenses?

9 A They were going toward Youth for Tomorrow, yes.

10 Q Going for Youth for Tomorrow?

11 A Yes, that's correct.

12 Q Do you recall being deposed in this action in the  
13 summer of 2022?

14 A Yes.

15 Q And isn't it true that only a couple days before that  
16 deposition you learned for the first time that the Audit  
17 Committee had approved certain sponsorship payments to Youth for  
18 Tomorrow?

19 A Yes, I believe that's true.

20 Q And no one from the Audit Committee asked you about  
21 payments to Youth for Tomorrow before approving sponsorship  
22 payments; correct?

23 A I don't think they knew about it. If anyone had asked,  
24 I would have told them there were additional payments that were  
25 not included in those numbers.



## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q The NRA also paid NRA funds to Youth for Tomorrow in  
2 another way, correct, through Ackerman McQueen?

3 A Yes, and I did not know about that. I thought Ackerman  
4 McQueen were doing that pro bono.

5 Q And these payments weren't reported to the Audit  
6 Committee; correct?

7 A That's correct. We all thought they were doing it pro  
8 bono. In fact, they even got up on stage and accepted volunteer  
9 awards and everything else.

10 Q Are you aware that in June of 2022 John Frazer was  
11 deposed in this action as the NRA corporate representative?

12 A I know John Frazer has been deposed as the corporate  
13 representative. I wasn't aware of specifically what happened at  
14 that one.

15 Q And are you aware that in that deposition the NRA, as  
16 John Frazer the corporate rep, admitted it did not know how much  
17 money it had been paid to Youth for Tomorrow?

18 A I wasn't aware of that, but I believe that's true  
19 probably.

20 Q In 2018, you had discussions with Ackerman McQueen  
21 about the potential acquisition of a home for you and your wife  
22 Susan; correct?

23 A Yes, that's correct, not for my -- not for us to own.

24 Q But you did have discussions with the Ackerman McQueen  
25 about a potential acquisition of a house?

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 A Yes.

2 Q And you and Ms. LaPierre visited a number of real  
3 estate properties in the Dallas area; correct?

4 A Yes.

5 Q After reviewing several properties, you and Susan  
6 decided that you had a favorite residence that was located in  
7 West Lake, Texas; correct?

8 A Yes. They were looking for a safe house in a gated,  
9 guarded community for security. So, yes, that's correct. There  
10 was one house that -- that had a safe room in it.

11 MR. CONLEY: I'd like to introduce Tab 118,  
12 Plaintiff's Exhibit 4840.

13 THE COURT: Did you say Tab 118?

14 MR. CONLEY: Yes.

15 THE COURT: I think I don't have that one.

16 MS. ROGERS: Subject to foundation, no objection.

17 THE COURT: It is not in this new binder you gave  
18 me, but -- wait, I'm sorry. It is out of order.

19 118?

20 MR. CONLEY: Yes.

21 THE COURT: All right. So, if you can ask  
22 questions before putting it up.

23 Q Mr. LaPierre, do you recognize Plaintiff's  
24 Exhibit 4840?

25 A I do.

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q And what do you recognize it to be?

2 A That was the house that I believe had the safe room in  
3 it.

4 Q Okay, and you visited this house a couple of times;  
5 correct?

6 A Yes, that's correct.

7 Q And do you believe these pictures accurately represent  
8 the house at the time that you viewed it with your wife?

9 A Yes, I do.

10 MR. CONLEY: I move its admission.

11 THE COURT: It is admitted.

12 (Plaintiff's Exhibit 4840 was admitted and  
13 received into evidence.)

14 Q And how many times did you and Ms. LaPierre tour this  
15 house?

16 A We went by it a couple of times with a realtor that  
17 Ackerman McQueen assigned.

18 Q And do you recall when that was?

19 A It would have been in April of 2018, I believe.

20 Q And is April of 2018 the last time that you toured it?

21 A I believe so. Our convention was coming up. We were  
22 dealing with all -- I was dealing with all kinds of issues  
23 involving New York State; and, as I said, our convention was  
24 coming up. I believe that's the last time. It was sometime  
25 in -- in mid to late April.

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q You hired Josh Powell to be your Chief of Staff,  
2 correct?

3 A Yes, I did.

4 Q It was your decision to hire him?

5 A Yes, it was.

6 Q And you hired him in 2016; correct?

7 A Yes.

8 Q You didn't check his credentials first, did you?

9 A Well, he was on our board of directors, and I checked  
10 with Pete Brownell who had been in business arrangements with  
11 him and president of the NRA, and he told me he thought Josh  
12 would do a good job as long as I managed him.

13 Q And did you do anything else to check his credentials?

14 A I did not.

15 Q And you promoted Mr. Powell to the position of general  
16 director of general operations; correct?

17 A Yes, that's correct.

18 Q And his starting salary at the NRA was \$250,000;  
19 correct?

20 A Yes, that's correct, I believe.

21 Q And you approved a raise of Mr. Powell's salary from  
22 250,000 to 500,000 shortly after he was hired; correct?

23 A Yes, that's correct.

24 Q And you executed a five-year Employment Agreement with  
25 Mr. Powell in late 2016, correct?

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1           A     I believe that probably is true. I'm not sure. I may  
2 have.

3                   MR. CONLEY: If we could please turn to Tab 113,  
4 which is Plaintiff's Exhibit 2925, and I move for admission  
5 of the exhibit.

6                   THE COURT: Any objection?

7                   MS. ROGERS: Subject to foundation, no objection.

8                   THE COURT: Well, there's multiple documents in  
9 this exhibit, yes?

10                  MR. CONLEY: Yes. This is -- yes, this is how it  
11 was produced, but it is multiple documents.

12                  THE COURT: Are you seeking it for the whole thing  
13 or just the Agreement at the beginning?

14                  MR. CONLEY: The Agreement at the beginning, pages  
15 5 to 10.

16                  THE COURT: So, what do you want to do? Do you  
17 want to create a new exhibit out of this, or do you want to  
18 see if you can -- he can lay a foundation for the entire  
19 thing?

20                  MR. CONLEY: Your Honor, I'll create a new exhibit  
21 out of this. Slash A I think we're doing.

22                  THE COURT: So, this will be for identification at  
23 this point anyway PX 2925-A, and it is solely going to be  
24 pages 5 through 10 of the existing exhibit.

25                   I think that will at least setting a foundation

**W. LaPierre - by Plaintiff - Direct/Mr. Conley**

1 easier than trying to go through all of these at the same  
2 time.

3 MR. CONLEY: I agree. Thank you, your Honor.

4 Q Mr. LaPierre, do you have the exhibit in front of you?

5 A I do.

6 Q If you could turn to page 10. Is that your signature  
7 at the bottom?

8 A Yes, it is.

9 Q And you'd agree this is an Employment Agreement that  
10 was entered into with Mr. Powell?

11 A Yes, I do.

12 Q And if you could turn to page 5 of the exhibit, which  
13 is the first page of the Employment Agreement.

14 You agree that this sets his base salary at 500,000 a  
15 year?

16 THE COURT: Well, have we moved this in yet?

17 MR. CONLEY: Sorry, I didn't see it was published.  
18 No.

19 THE COURT: Before you ask what's in it, is that  
20 sufficient?

21 MS. ROGERS: Yes.

22 THE COURT: All right, this exhibit as amended  
23 PX 2925-A is admitted just for the pages 5 through 10.

24 MR. CONLEY: Thank you.

25 (Plaintiff's Exhibit 2925-A pages 5 through 10 was

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 admitted and received into evidence.)

2 THE COURT: Now you can put it up and ask  
3 questions.

4 Q Mr. LaPierre, you would agree this sets Mr. Powell's  
5 compensation at 500,000 a year?

6 A Yes, I would.

7 Q And would you agree if you turn to page 10, that this  
8 is dated November 17, 2016?

9 A Yes, I would.

10 Q And in June of 2017, you approved another pay raise for  
11 Mr. Powell; correct?

12 A Yes.

13 Q To 650,000 a year?

14 A Yes.

15 Q In addition to Mr. Powell's salary, you also authorized  
16 the payment of travel expenses between Michigan and Virginia for  
17 Mr. Powell; correct?

18 A I'm not sure. Is that in the contract? I'm not sure  
19 about that.

20 Q You don't recall authorizing him to do that?

21 THE COURT: I don't think he's questioning you out  
22 of the document at this point now. He's just moving on to  
23 just your recollection.

24 A I just don't remember it.

25 Q Do you recall authorizing Mr. Powell to rent an

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 apartment in Virginia to be paid for by the NRA?

2 A I know he had an apartment in Virginia. I don't recall  
3 authorizing it. We may have authorized it for a time being.

4 Q In 2018, certain members of the NRA Financial Services  
5 Division raised concerns about Mr. Powell's practices and  
6 behavior; correct?

7 A Yes, that's correct.

8 Q And after that, you appointed Mr. Powell in 2019 to a  
9 newly created position of senior strategist; is that right?

10 A Yes, I moved him out of general operations because  
11 there were a lot of complaints that he was abusive to the staff,  
12 and I moved him out of that position to put him in another  
13 position.

14 Q And that was a promotion, correct?

15 A Not really. I wanted to get him out of general  
16 operations where he would have been first in line if I ended up  
17 getting hit by a bus, and I wanted to get him out of that  
18 position because he was being abusive to employees.

19 Q Isn't it true that you announced to all NRA staff that  
20 you were promoting Mr. Powell to the position of senior  
21 strategist?

22 A Yes, I think that's true.

23 Q And around the time of this promotion, you also gave  
24 Mr. Powell another raise; correct?

25 A He ended up getting another raise, that's correct.



## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q To \$800,000 a year?

2 A Yes, he did.

3 Q You're familiar with Chris DeWitt; correct?

4 A I think Mr. Powell kind of -- I'm not sure how that  
5 last raise happened, to tell you the truth. It looks like it  
6 wasn't authorized by me. I think Mr. Powell may have worked the  
7 system on that.

8 Q Worked the system?

9 A Yes.

10 Q Mr. Powell was your Chief of Staff, right?

11 A That's correct.

12 Q He reported to you; right?

13 A Yes.

14 Q He reported to you the entire time he worked at the  
15 NRA; right?

16 A Yes, until I fired him.

17 Q And you're saying that you didn't approve his pay  
18 raise?

19 A I was trying to figure it out at the time we fired him.

20 Q And what do you mean you were trying to figure it out?

21 A How it happened.

22 Q How he got a pay raise?

23 A Yes.

24 Q And what did you learn?

25 A I learned that there was a memo that went from the

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 treasurer's office to our -- our Human Resources Department  
2 authorizing it.

3 Q And who sent the memo?

4 A It was sent by Mr. Phillips. Looking back on it, I  
5 assumed he probably told Mr. Phillips that I had authorized it.

6 Q But you didn't authorize it?

7 A I wasn't aware of it.

8 Q So, I'm having trouble following this.

9 A Me, too.

10 Q So, did you discuss this with Mr. Phillips or  
11 Mr. Powell?

12 A There were other issues going on with Mr. Powell at  
13 that time that I -- I did not. I wasn't even aware of it for  
14 awhile.

15 Q Did you make any efforts to rescind the pay raise or to  
16 discipline Mr. Powell?

17 A I did not. Mr. Powell was working on Carry Guard. If  
18 that had worked, the potential of it was \$30 million of revenue  
19 to the NRA, and I did not.

20 Q So, why didn't you raise it with Mr. Powell?

21 A I didn't. I probably should have.

22 Q You're familiar with Chris DeWitt; correct?

23 A Yes, I am.

24 Q You're aware that in 2016 the Financial Services  
25 Division found that Mr. DeWitt had been abusing his credit card

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 privileges?

2 A What was the year, counselor?

3 Q 2016.

4 A I was not aware of that in 2016.

5 Q Are you aware of that now?

6 A Yes.

7 Q And you're aware that in 2017, Mr. DeWitt was  
8 delinquent in paying back money he owed to the NRA for improper  
9 personal expenses; correct?

10 A No, I don't believe I was aware of that at the time.

11 Q Are you aware of that now?

12 A Yes, I've heard about that.

13 Q And you're aware that in 2019, the Financial Services  
14 Division revoked Mr. DeWitt's credit card; right?

15 A No, I'm not.

16 Q You're not aware of that then or now?

17 A I'm not aware of that.

18 Q What are you aware of?

19 A I'm aware of the fact that at one point it came to my  
20 attention that Mr. DeWitt had an expense account abuse, and we  
21 called him in. We talked about it.

22 We -- we said if it happens again, you're not going  
23 to -- there's not going to be -- you're going to be fired is  
24 what we told him.

25 He had another job offer. He was probably our -- one

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 of our best guys in terms of relationships with donors. We were  
2 juggling that. We ended up giving him a raise so that he would  
3 not take that other job, but we put him on notice if anything  
4 happened again with his expenses, he would be fired.

5 A couple months later, he took an advance for a  
6 convention. He did not pay it back in time, and we fired him.

7 Q So, stepping back a little bit. After the NRA  
8 bankruptcy proceeding in 2021 --

9 THE COURT: Counsel, if we're going to move to  
10 another topic, this is usually the time we take our morning  
11 break. Is this --

12 MR. CONLEY: Two questions.

13 THE COURT: Okay, that's fine.

14 Q After the NRA bankruptcy proceeding you approved a  
15 raise for Mr. DeWitt; right?

16 A Yes.

17 Q And this raise increased Mr. DeWitt's salary up to  
18 180,000 a year; correct?

19 A Yes, that was what it was going to take to retain him  
20 given the offer he had.

21 Q And that raise that you approved more than doubled his  
22 salary; correct?

23 A That's correct.

24 THE COURT: Never two.

25 MR. CONLEY: I tried.

1                   THE COURT: You should avoid the specific numbers.  
2                   It's always a problem. We're going to take a short break.  
3                   We'll see you soon.

4                   COURT OFFICER: All rise, jury exiting.  
5                   (Whereupon, at this time the jury then left the  
6                   courtroom.)

7

8                   (Continued on next page)

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**W. LaPierre - by Plaintiff - Direct/Mr. Conley**

1 THE COURT: Just during the break, just you're  
2 still on the stand. You shouldn't discuss the substance of  
3 your testimony with anyone including counsel.

4 MR. FLEMING: Your Honor, one quick point.

5 THE COURT: Okay.

6 MR. FLEMING: During the testimony a question was  
7 asked about Mr. Frazer's testimony as the corporate  
8 representative. I don't know what your Honor's practice is  
9 as far educating the jury or the difference between personal  
10 versus corporate rep deposition, but I raise it because I'm  
11 concerned there might be some confusion that this might be  
12 his personal testimony which it was not.

13 THE COURT: Well, I mean the best place to do that  
14 would be for you to elicit that from your client when he's  
15 on the stand to explain that in his own words, if there is a  
16 need to clarify it. There really wasn't much done with it  
17 yet. I'm happy to do that. It's not the simplest thing to  
18 explain because as with all corporate representative  
19 depositions, some of it is asking for his own knowledge and  
20 some of it is, he's put there to convey the corporate  
21 position. So I don't know exactly how it this deposition  
22 was, whether it was a purely corporate rep deposition or  
23 partial.

24 MR. FLEMING: It was purely corporate. There was a  
25 lot of education involved.

**W. LaPierre - by Plaintiff - Direct/Mr. Conley**

1           Perhaps a simple solution, I can ask my client  
2           about it when he testifies, but also perhaps in the future  
3           we can refer to the NRA's corporate or deposition rather  
4           than having to name Mr. Frazer.

5           THE COURT: Did he have a separate personal  
6           deposition?

7           MR. FLEMING: He did.

8           THE COURT: All right. Thanks.

9           (Whereupon at this time there was a recess taken.)

10          (Witness resumed the witness stand.)

11          THE COURT: What's the order of witnesses after  
12          this just to give me a sense of timing and when we are  
13          getting near the end of the State's case?

14          MS. CONNELL: So as soon as Mr. LaPierre wraps up,  
15          we are showing the rest of Mr. Spray's videotape deposition.  
16          We are moving on to Mr. Frazer. After that will be  
17          Lieutenant Colonel Lee. And then depending on -- there's  
18          very, very short video from Ms. Hallow, if we get that  
19          finalized.

20          Gayle Stanford can not appear in person. She was  
21          supposed to so we have her video deposition which I think  
22          has been submitted to Mr. Blaustein, and then Mr. Hines  
23          Plaintiff's expert will close it out.

24          I think I left off Ms. Supernaugh.

25          THE COURT: S-U-P-E-R-N-A-U-G-H?

**W. LaPierre - by Plaintiff - Direct/Mr. Conley**

1 MS. CONNELL: Yes. S-U-P-E-R-N-A-U-G-H. And we  
2 have called board member David Coy and Second Vice-President  
3 of the NRA, but really it's for admission of a document. We  
4 have asked the NRA if they would agree to submission of  
5 those documents or that document, and if so, we don't need  
6 to call him.

7 THE COURT: This all fits within the time  
8 allocation, you think?

9 MS. CONNELL: It's tight, and we would love to get  
10 a little more time.

11 THE COURT: One thing I can't do is create time, but  
12 when -- just whatever additional -- all of your time on  
13 direct of new witnesses comes at the expense of cross of  
14 their witnesses, so it's just a zero sum game.

15 MS. CONNELL: We understand that, your Honor.

16 MR. FARBER: So as to -- I could -- I can't speak  
17 to anyone else, but we are not going to stipulate to that  
18 exhibit.

19 MS. ROGERS: The NRA does not intend to stipulate  
20 to the admission of that exhibit.

21 THE COURT: Let's put a pin in that for a minute,  
22 and let's let the jury back in.

23 THE COURT OFFICER: All rise. Jury entering.

24 (Whereupon, at this time the jury entered the  
25 courtroom.)



## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 THE COURT: Welcome back. Have a seat, please.

2 CONTINUED DIRECT

3 EXAMINATION BY MR. CONLEY:

4 THE COURT: Okay. Mr. Conley, you may continue.

5 Q Mr. LaPierre, before the break we were discussing Josh  
6 Powell.

7 Do you recall that?

8 A Yes, I do.

9 Q And we were discussing his raise from 650 to \$800,000 a  
10 year.

11 Do you recall that?

12 A Yes, I do.

13 Q Do you recall when that raise occurred?

14 A I think it was sometime in 2018.

15 Q If you could please turn to Tab 113, Page 15, and this  
16 portion is not in evidence, but I would like to see if this  
17 refreshes your recollection.

18 A Yes, it does.

19 Q And when was Mr. Powell's salary raised to \$800,000 a  
20 year?

21 A It looks like Tuesday, March 20, 2018.

22 Q Mr. LaPierre, I'd like to, if you could, continue down  
23 on this page.

24 A Okay.

25 THE COURT: Just to refresh his recollection.

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 MR. CONLEY: Yes. Yes.

2 A Yes.

3 Q Does that refresh your recollection on when Mr.  
4 Powell's salary was raised to \$800,000 a year?

5 A It says January 1, 2018.

6 Q And is that consistent with your understanding of when  
7 Mr. Powell's salary was raised?

8 A Yes.

9 Q Mr. Powell was terminated in 2020; correct?

10 A That's correct.

11 Q And you didn't do anything in an attempt to rescind or  
12 question his salary from January 1, 2018 to 2020?

13 A That's correct.

14 Q I'd like to turn to board elections.

15 Every year the nominating committee puts out a list of  
16 candidates for the NRA Board of Directors; correct?

17 A Yes.

18 Q These candidates are then put on a ballot that's  
19 submitted to NRA members eligible to vote; right?

20 A Yes.

21 Q Candidates who are not elected to the Board are then  
22 automatically included as candidates for the 76th board member  
23 seat?

24 A Yes.

25 Q The vote for the 76th board member seat happens at the

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 annual meeting; correct?

2 A Correct.

3 Q And every year you would discuss your preferred  
4 candidates for the Board with Millie Hallow; correct?

5 A Well, there would be officers. The officers would  
6 discuss candidates with me, and Millie would be in a lot of  
7 those meetings.

8 Q And you would provide your recommendations; right?

9 A They would ask me my recommendations, yes.

10 Q And when you were deposed in this litigation in 2022,  
11 you could not recall an instance in the last 10 years when the  
12 nominating committee had nominated a board candidate you did not  
13 agree with.

14 Do you recall that?

15 A I do recall that.

16 Q You're familiar with Paul Payne; correct?

17 A Yes, I am.

18 Q He is a former NRA employee?

19 A Yes. He was a California activist that volunteered out  
20 there that became an NRA employee.

21 Q And you hired Mr. Payne; correct?

22 A Yes. That's correct.

23 Q He was paid out of the EVP budget?

24 A He was hired first by the Institute for Legislative  
25 Action I believe and then he moved out to the EVP budget and

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 then he moved over to the Director of General Operations budget.

2 Q And he moved over to the EVP budget in 1998; is that  
3 right?

4 A I think that sounds about right.

5 Q And he moved to General Operations around 2019; is that  
6 right?

7 A Yes, I believe that's correct.

8 Q His job title when he was paid out of the EVP budget  
9 was Special Assistant to the Executive Vice President; correct?

10 A Yes.

11 Q He reported to you; correct?

12 A Yes.

13 Q Mr. Payne would organize volunteers to hand out  
14 pamphlets for particular board candidates for the 76th director  
15 election at the annual meetings; correct?

16 A A lot of the California activists came in. I think Mr.  
17 Payne probably did that.

18 Q And he oversaw that effort; right?

19 A He was one of the people that participated in it.

20 Q And he would organize volunteers for this pamphleting?

21 A Maybe.

22 Q You don't have personal knowledge of that?

23 A I didn't instruct that, but he may have -- I think he  
24 probably did that.

25 Q And it's your understanding that these volunteers would

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 circulate pamphlets for particular board candidates; right?

2 A Yes. There were -- the Board would decide on which  
3 candidate they preferred to be 76th director, and they -- yes,  
4 there were pamphlets handed out.

5 Q And when you were deposed in 2022 in this litigation,  
6 you couldn't recall a time when you provided a recommendation  
7 for the 76th election that Mr. Payne's group didn't follow;  
8 correct?

9 A I think that's true, but it wasn't only me. It was the  
10 officers that ultimately decided. In fact, it was the officers  
11 that ultimately decided.

12 Q But you weighed in.

13 A Yes. They asked me my recommendation, and they got to  
14 the point where the person actually was the next person in line  
15 in terms of -- if -- it was the one that was next in line that  
16 did not get the votes to get in but was next in line.

17 Q When the volunteers would go to the annual meetings to  
18 pamphlet, the NRA would pay for their travel; correct?

19 A Yes, we brought in the California activists as a reward  
20 for the work they were doing out there as volunteers.

21 Q And they would pay for their lodging?

22 A The NRA did.

23 Q And entertainment expenses?

24 A Yes.

25 Q And these were not the only expenses the NRA paid to

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 support particular candidates for NRA Board elections; right?

2 A I don't know what you're referring to.

3 Q You don't -- you don't know of any other expenses the  
4 NRA paid to support particular candidates for board elections?

5 A No.

6 Q Will you agree that it wasn't appropriate for the NRA  
7 to pay the expenses of these volunteers?

8 A I don't know. They were being brought in because they  
9 were volunteering. I mean, they helped the NRA on programs,  
10 shooting events, instructors' programs, legislative advocacy. I  
11 mean, they worked their tails off out in California, and I  
12 thought that it would be a nice thing to bring them in for the  
13 Board meeting.

14 Yes, they did participate in doing what you're talking  
15 about also. A lot of them did.

16 Q The pamphleting?

17 A Yes.

18 Q For particular board candidates?

19 A Yes.

20 Q You hired John Frazer as general counsel in 2015;  
21 correct?

22 A Yes, I did.

23 Q And the NRA didn't use an executive search firm to  
24 identify candidates for the general counsel position; correct?

25 A No, we didn't.

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q You didn't interview any other candidates; correct?

2 A I did not.

3 Q Prior to hiring John Frazer, he had been in private  
4 practice for about 18 months; correct?

5 A I believe that's correct.

6 Q And isn't it true that when you hired Mr. Frazer, you  
7 did not know if he had any knowledge of New York not-for-profit  
8 law?

9 A That's correct.

10 Q And when you hired Mr. Frazer as general counsel, you  
11 did not know if he had familiarity with the law governing tax  
12 exempt organizations; correct?

13 A Correct.

14 Q And you did not make any inquiry of him to determine if  
15 he had those areas of expertise when you hired him as general  
16 counsel; correct?

17 A Correct.

18 Q You've told others that you wouldn't use Mr. Frazer to  
19 pay your parking tickets; right?

20 A That's been taken way out of context.

21 What I was talking about was John was a stickler to  
22 details, and what I was referring to was John was such a  
23 stickler to details, he might end up in an argument with a judge  
24 over some minor point, and that wouldn't go well. That's what I  
25 was referring to. That's been taken way out of context.

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q But you said it as a joke; right?

2 A I said it kind of -- kind of as an off -- off-hand  
3 comment in regard to what I just talked about.

4 Q And didn't you tell Josh Powell that you kept John  
5 Frazer as general counsel because he could be controlled?

6 A No, I did not. I did not say that in any way.

7 Q The NRA found Craig Spray by using an executive search  
8 firm; correct?

9 A Yes, we did.

10 Q When Craig Spray became CFO and treasurer of the NRA,  
11 he instituted a number of changes in the way the treasurer's  
12 office operated?

13 A Yes, he did.

14 Q One of Mr. Spray's priorities was putting a stop to  
15 verbal approvals or agreement to vendors; correct?

16 A Yes, and I was completely behind that in support of  
17 what he did.

18 Q And in May of 2020, the NRA entered into an employment  
19 agreement with Craig Spray; correct?

20 A Yes.

21 Q And you signed the agreement; correct?

22 A Yes, I did.

23 Q Mr. LaPierre, I'd like to turn to page 103 in your  
24 binder which is -- not 103. Sorry. One second. Under the  
25 agreement that the -- never mind. I don't have the right tab in



## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 front of me.

2 Under the agreement the NRA committed to paying Mr.  
3 Spray 18 months severance in the event he was terminated without  
4 cause; correct?

5 A Yes. That's correct.

6 Q In 2020 you advised the NRA's first vice president and  
7 second vice president of your intention to pay Craig Spray a  
8 retention bonus; correct?

9 A Yes. That's correct.

10 Q If you could please turn to Tab 104 in your binder.  
11 This is Plaintiff's Exhibit 603. It's not in evidence.

12 MR. CONLEY: I move for its admission.

13 MS. ROGERS: No objection.

14 MR. CORRELL: No objection.

15 THE COURT: Having heard none, it's admitted.

16 Q Mr. LaPierre, do you recognize Plaintiff's Exhibit 603?

17 A Yes, I do.

18 Q This is an October 2020 memorandum that was sent to the  
19 compensation committee under your name; correct?

20 A Yes. That's correct.

21 Q And on the second page of this exhibit, that's your  
22 signature; right?

23 A It sure is.

24 Q You reviewed and approved this memorandum before it was  
25 sent to the compensation committee; right?

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1           A     Yes. I also talked to the compensation committee about  
2 it.

3           Q     And this memorandum is dated October 29, 2020?

4           A     Yes, it is.

5           Q     In the memorandum you advised Carolyn Meadows, Charles  
6 Cotton and Willes Lee of your intention to give retention  
7 bonuses; correct?

8           A     Yes, I did.

9           Q     Including a retention bonus to Craig Spray of \$250,000;  
10 correct?

11          A     Yes, I did.

12          Q     Craig Spray signed the NRA Form 990 for 2017; correct?

13          A     I believe so.

14          Q     And 2018?

15          A     Yes, I believe that's correct.

16          Q     You signed the NRA Form 990 for 2019; correct?

17          A     That is correct.

18          Q     And you signed the Form 990 in November of 2020;  
19 correct?

20          A     Yes, that would have been right.

21          Q     Shortly before you signed the Form 990, Craig Spray  
22 asked you and several other senior executives and counsel to  
23 sign a certification attesting to the accuracy of the Form 990;  
24 correct?

25          A     I don't remember that.

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 Q You don't recall being asked to sign a certification?

2 A No, I don't.

3 Q Isn't it true that Mr. Spray would not sign the 2019  
4 Form 990?

5 A I know he did not end up signing it. I signed it.

6 Q In January of 2021, you fired Craig Spray; correct?

7 A Well, I had a conversation with Mr. Spray that we  
8 intended to move on. He had moved out of his office. He had  
9 moved back home. He had moved out of his apartment. He had  
10 moved back home. I knew that we needed -- he had -- he had a  
11 horrible heart attack in 2018. If he had Covid, they had told  
12 him from what I was informed by Craig Spray, he would probably  
13 not make it, and we needed a full-time CFO in the office.

14 I said to Craig, I intend to move on, and he said I  
15 want to retire for health reasons, and I want you to let  
16 everyone know it's for health reasons I'm doing this.

17 I had actually intended to do a consulting arrangement  
18 with him where he would continue to help us because I thought he  
19 was doing great.

20 Q And so you called Craig Spray; right?

21 A Yes. That's correct.

22 Q And you told him that you were moving in a different  
23 direction; correct?

24 A Yes.

25 Q You told him that you needed a full-time CFO?

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1           A     We never even got that far to tell you the truth. I  
2     said I'm moving in a different direction.

3                     He said, Look, I have to retire for health reasons.  
4     Please tell everyone it's for health reasons, and I said okay, I  
5     will. And that's -- that's what took place.

6           Q     And during this call with Mr. Spray, you also had on  
7     the line Linda Crouch, John Frazer, Vanessa Shahidi and Andrew  
8     Arulanandam?

9           A     Yes, I did.

10          Q     So you had the director of human resources, your  
11     general counsel and head of public relations on the call; right?

12          A     Yes.

13          Q     And that call had not been scheduled with Mr. Spray in  
14     advance; correct?

15          A     I don't believe that it had.

16          Q     And a few minutes after your call with Mr. Spray ended,  
17     the NRA shut off Mr. Spray's access to his work email and NRA's  
18     computer network; right?

19          A     I believe they did. I believe that was the practice.  
20     I believe they did.

21          Q     And the NRA paid Mr. Spray 18 month severance; correct

22          A     Yes, we did as part of the contract.

23          Q     Because under Mr. Spray's employment contract that you  
24     signed, he was entitled to 18-months severance in the event he  
25     was terminated without cause; right?

## W. LaPierre - by Plaintiff - Direct/Mr. Conley

1 A Yes. That's correct. Yes.

2 Q What's the cost of an annual membership for the NRA?

3 A Well, it varies. It goes from \$45 to we discount it to  
4 25.

5 Q And \$45 for an annual membership?

6 A Yes, I believe.

7 Q You're represented in this lawsuit by Kent Correll?

8 A Yes, I am.

9 Q In preparing to testify in this trial, did you meet  
10 with Mr. Correll?

11 A Yes, I did.

12 Q Did counsel for any of the other defendants take part  
13 in these meetings?

14 A Mr. Brewer was in one of the meetings.

15 Q Anyone else?

16 A There was an attorney named John that sat in for a  
17 little bit. I am trying to think if there was anyone else.  
18 Maybe Sarah was there for a minute.

19 Q Sarah Rogers?

20 A Yes.

21 Q Of the Brewer firm?

22 A Yes, but she was just --- I can't remember. Someone  
23 asked her a question.

24 Q And do you remember what firm or party John the  
25 attorney is affiliated with?

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1           A     The Brewer firm.

2           Q     Okay. A few days before this trial started, you  
3 announced you were retiring from the NRA; correct?

4           A     Yes.

5           Q     You are not leaving the NRA because you were fired;  
6 right?

7           A     No.

8           Q     You are not leaving the NRA because you were facing  
9 suspension?

10          A     No.

11          Q     You're not leaving the NRA because you were facing any  
12 disciplinary action; correct?

13          A     Correct.

14          Q     As far as you know, you're leaving on good terms with  
15 the NRA; right?

16          A     Correct.

17                   MR. CONLEY: Pass the witness, your Honor.

18                   THE COURT: Okay.

19                   Have you all decided which order you're going to  
20 go? The usual order?

21                   MS. ROGERS: The usual order, yes.

22           **CROSS-EXAMINATION**

23           **BY MS. ROGERS:**

24           Q     Mr. LaPierre, good morning.

25           A     Good morning.

## W. LaPierre - by Plaintiff - Cross/Ms. Rogers

1 Q Have you and I spoken since you took the stand last  
2 Friday?

3 Mr. LaPierre, have you and I spoken since you took the  
4 witness stand last Friday?

5 A No, we haven't.

6 Q And you mentioned that I, and I don't want you to  
7 testify about counsel's advice, but you mentioned that I asked  
8 you -- maybe I answered maybe one question during your  
9 preparation; right?

10 A You were asked one question.

11 Q Right. Otherwise, we haven't met or spoken or prepared  
12 for your testimony; right?

13 A Correct.

14 Q You would agree with me, Mr. LaPierre, that if you sent  
15 a private plane to pick up your family or your friends without  
16 an NRA business purpose at the NRA's expense, that was wrong?

17 A Yes.

18 Q It shouldn't have happened.

19 A Yes.

20 Q And before 2018, you never told the Board about it;  
21 right?

22 A That's correct.

23 Q And in fact, it violated explicit policies of the  
24 Board; right?

25 MR. CONLEY: Objection. Leading.

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 THE COURT: Hang on a second.

2 MS. ROGERS: So I think there's clearly an adverse  
3 dimension in this case, and I don't intend to lead the  
4 witness on issues where were not adverse, but here, the  
5 witness is being sued for breaches of duty to my client.  
6 Any damages awarded will be paid to my client, and I'm  
7 examining him on issues where the interest are divergent.

8 MR. CONLEY: Your Honor, he is the current  
9 executive vice president. He certified the response to the  
10 Notice to Admit on January 28.

11 MR. ROGERS: He certified some responses to the  
12 Notice to Admit, but I don't think they were on the  
13 questions I'm asking him now.

14 THE COURT: Certainly, it would be unusual to have  
15 the company take that position with it's CEO.

16 Do any of the defendants have a position on this?  
17 Mr. Correll?

18 MR. CORRELL: I defer to the NRA on this, your  
19 Honor.

20 THE COURT: Despite the adversity.

21 MR. CORRELL: Well, I understand the argument, and  
22 I think that's correct. I do think the Court should allow  
23 some latitude in this regard. It is cross.

24 MS. ROGERS: And your Honor, there is a reason the  
25 parties have separate counsel, and Mr. LaPierre is the



**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 outgoing. So obviously, if there are --

2 THE COURT: Overruled.

3 Q All right. Mr. LaPierre, would you agree that even if  
4 that happened by mistake, even if you accidentally authorized a  
5 flight for someone you shouldn't have, you had a duty to tell  
6 the Board about it; right?

7 A I was instructed by security on how to fly private. I  
8 would agree that most of the Board did not know until 2020  
9 actually when they were presented a security plan that I was  
10 flying private.

11 Q And the security instructed you to fly private, but  
12 there was no security expert who said that your niece had to fly  
13 private.

14 A Not until 2019 study was done that went to the Board in  
15 2020.

16 Q And so you would agree it was a mistake to authorize  
17 private flights for her without a business purpose; right?

18 A For myself.

19 Q Well for you to authorize private flights for your  
20 family or friends who don't face the security threat you do.

21 A Yes, I would.

22 Q Okay. And we looked at some invoices for some times  
23 that this happened. So you sent a plane to pick up your niece's  
24 husband in Las Vegas because the kid needed a babysitter; right?

25 A Yes, that's correct.

## W. LaPierre - by Plaintiff - Cross/Ms. Rogers

1 Q And that was wrong and it shouldn't have happened.

2 A Yes.

3 Q It was a violation of what the Board authorized you to  
4 do; right?

5 A Yes.

6 Q And until the course correction or the 360 review that  
7 you're talking about, you never told the Board about that;  
8 right?

9 A Right.

10 Q And we looked at an invoice for a time when you sent a  
11 plane for your niece because she and her baby was stuck in a  
12 commercial airport and their flight had been delayed; right?

13 A Yes.

14 Q And that was wrong, and it shouldn't have happened.

15 A Right.

16 Q And the Board never authorized you to do it.

17 A Yes.

18 Q The Board forbade you to do it.

19 A Yes. It was not -- not the right thing to do.

20 Q And until 2018 or 2019, you never told the Board;  
21 right?

22 A Correct.

23 Q All right.

24 Now, we talked about plans. But you would agree with  
25 me that the same rules govern black car service; right?

## W. LaPierre - by Plaintiff - Cross/Ms. Rogers

1 A Yes.

2 Q If your family or friends used a black car at the NRA's  
3 expense without a business justification for that luxury  
4 service, you would agree that that broke the rules; right?

5 A Yes, I would.

6 Q And it shouldn't have happened.

7 A Yes.

8 Q And the Board forbade it.

9 A Yes.

10 Q And until 2018 or 2019, you never told the Board.

11 A Yes.

12 Q All right. And even though it didn't cost the NRA  
13 anything, you would agree with me that you had a duty to tell  
14 the Board about luxury vacations you took with the McKenzies on  
15 their yacht or to the Taj Mahal; right?

16 A Yes, I would.

17 Q It was wrong, and it shouldn't have happened; right?

18 A Yes.

19 Q And until 2018, you never told the Board.

20 A Correct.

21 Q And for years, you filled out conflict disclosure forms  
22 prescribed by the Board and you left this information off;  
23 right?

24 A Yes.

25 Q We looked at some invoices for some specific trips you

1 took with the McKenzies, a time that your wife went on the  
2 McKenzies yacht about nine years ago in 2015.

3 Do you recall that this morning?

4 A Yes.

5 Q And we looked at some MMP price increases that happened  
6 during the same years?

7 A Yes.

8 Q And you testified that you didn't think those were  
9 related?

10 A Yes. I do not believe they were related in any way.

11 Q And can you explain to the jury why you seem confident  
12 that they are not related?

13 A Well because I trusted them. They told me that the NAR  
14 would bear no cost.

15 MR. CONLEY: Objection. Hearsay.

16 THE COURT: I'm sorry. Say again.

17 MR. CONLEY: Objection. Hearsay.

18 MS. ROGERS: I'm asking the basis for his belief.

19 THE WITNESS: They testified under oath that none of  
20 that was charged to the NRA.

21 THE COURT: Well, I'll overrule it anyway. That's  
22 fine. If there's an objection you should --

23 MS. ROGERS: If there's an objection, wait for the  
24 judge to rule.

25 (Continued on the following page.)

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1

2 Q You testified that the Attorney General -- one of the  
3 very first questions Mr. Conley asked you was whether you had  
4 significant authority and discretion as EVP and CEO. Do you  
5 recall that?

6 A Yes.

7 Q That's how they led off their examination. You would  
8 agree with me the board never gave you authority or discretion  
9 to send a private plane for your niece; right?

10 A Yes.

11 Q The board never gave your authority or discretion to  
12 let Ackerman McQueen charge the NRA for hair or makeup for your  
13 wife without a business reason; right?

14 A Yes.

15 Q And the board never gave you authority or discretion to  
16 let your friend or your family or their nieces or their husbands  
17 use limousines and charge the NRA; right?

18 A Yes.

19 Q And, in fact, you'd agree with me that you were acting  
20 outside your authority as Executive Vice President to the extent  
21 that you authorized any of those things; right?

22 A Yes.

23 Q You were acting outside your authority as Executive  
24 Vice President when you buy a handbag for David McKenzie's wife  
25 at Bergdorf Goodman as a gift; right?

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1           A     Yes. I thought it helped maintain relationships.

2           Q     Now, that was on an expense report that we looked. All  
3 those little handwritten expense reports that filled the screen,  
4 you recall those; right?

5           A     They all run expense reports.

6           Q     Right. And for years we heard on Friday, we heard  
7 testimony that for years your expenses were processed through  
8 the NRA Lobbying Division, ILA. Do you recall that discussion?

9           A     Yes, that's how it started out and continued that way.

10          Q     Can you explain to the jury how why your expenses were  
11 processed through ILA?

12          A     It started out that way and no one thought to change it  
13 until Craig Spray came in and said that he thought that probably  
14 was not a good way to do it, and they should be done through the  
15 treasurer's office.

16          Q     Now, to your understanding during all those years that  
17 your expenses were processed through the Lobbying Division, do  
18 you know of any way that Sonya Rowling or Craig Spray or anyone  
19 else in the NRA Financial Services Department could have known  
20 about those expenses?

21          A     Yes. ILA could be audited by NRA whenever NRA wanted  
22 to, and I know for a fact that in some years Pricewaterhouse  
23 used to review them.

24          Q     If one of those audits wasn't conducted, do you have an  
25 understanding as to whether those expenses would be visible to

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 someone like Ms. Rowling in the ordinary course?

2 A No, they wouldn't.

3 Q And the NRA Audit Committee wouldn't have seen those  
4 expenses either; right?

5 A That's correct.

6 Q Last week on Friday you were shown a ten-year contract  
7 that you signed with a board member, Marion Hammer, for lobbying  
8 an activist in Florida as you would call them?

9 A Yes.

10 Q I think you testified that a contract like that  
11 wouldn't happen now. Do you recall that?

12 A That's correct.

13 Q Can you explain to the jury why that kind of contract  
14 wouldn't happen now?

15 A Because under the course correction, which is a 360  
16 review of every single thing that the NRA did, every employee  
17 and every vendor starting in 2018 to make sure we're in complete  
18 compliance with policies and procedures of the board and New  
19 York Nonprofit Law. There are no more long-term contracts.

20 Q And Marion Hammer is a board member. So why would you  
21 offer her payments to her in the first place?

22 A Because she was a legendary person in the 2nd Amendment  
23 movement. She had incredible talent, not only in terms of  
24 lobbying, but also in terms of advice in terms of other states  
25 and also in terms of just things like, direct mail, in terms of

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 opinions on that and other NRA issues that I would seek advice  
2 on.

3 Q We also saw that you offer as payments to another board  
4 member named Sandra Froman. Do you recall that?

5 A I do.

6 Q Why would you authorize payments to Sandra Froman?

7 A Because she had a unique talent of being as a lawyer  
8 from Harvard, being able to do speeches at law schools, at  
9 places like the Federal Society and other places where it would  
10 be in NRA's interest.

11 Q To your knowledge -- well, can you describe the extent  
12 to which your knowledge board members still receive payments  
13 from the NRA today?

14 A We have stopped all of that under the course correction  
15 with the exception of Ms. Hammer's contract is still in effect.

16 Q Is Ms. Hammer's contract a long-term contract?

17 A No, it is a 30-day contract. It has a 30-day  
18 revocation clause.

19 Q All right, now over the course of what you called a  
20 course correction or 360 review, that's an effort the NRA  
21 undertook starting in 2018 I think you testified?

22 A That's correct.

23 Q Over the course of that process, can you describe for  
24 the jury how your business expense practices changed?

25 A Well, my business expense process changed because in



**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 the course correction, the new treasurer, Craig Spray, said that  
2 he thought it wasn't best practices to have them done under ILA.  
3 He thought they should be done through the treasurer's office  
4 and they were transferred over to the treasurer's office.

5 Q To your knowledge, since 2018 can you describe the  
6 extent to which any of your expenses have been paid through ILA?

7 A I don't believe they have been.

8 Q Were there any expenses that the NRA refused to pay?

9 A Yes, actually there were about -- I think it was about  
10 \$200,000 worth of expenses that were dated that they refused to  
11 pay.

12 Q Between the time the NRA started its course correction  
13 and the time you announced your resignation, can you describe  
14 how your relationship with David McKenzie changed?

15 A Well, yes. When I started to look into what everything  
16 as part of the course correction in 2018, one of the things we  
17 looked at was all of our top vendors; and I came to realize that  
18 Crime Strike had diminished in a big, big way. I thought  
19 that -- I couldn't understand the invoices, some of the invoices  
20 were coming in and I ended the relationship with Associated  
21 Television. Crime Strike used to go to about 145 stations. It  
22 had diminished down to a very small number.

23 Q How many trips have you taken on the McKenzie's yacht  
24 since 2018?

25 A Since 2018, none.

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 Q What about your wife, how many times has she been on  
2 the yacht since 2018?

3 A None.

4 Q Since 2018, how many times has David McKenzie taken you  
5 to Budapest or the Taj Mahal?

6 A I've taken no trips with the McKenzies since the course  
7 correction.

8 Q And between the time the NRA started its course  
9 correction and the time you announced your resigning, can you  
10 describe how your relationship with Tony Makris of Under Wild  
11 Skies changed?

12 A Well, it ended. I -- I used to consider him like a  
13 brother; and as we got into the course correction, one, he  
14 worked for Ackerman McQueen. Ackerman McQueen became -- the  
15 only word you can describe is hateful toward the NRA when we  
16 started asking to see their books and records, and Tony Makris  
17 became -- well, part of that in terms of being really not being  
18 nice toward the NRA or to me. But, also, when we asked to see  
19 the backup on his supplementals as part of the investigation in  
20 Under Wild Skies.

21 Q Just to clarify for the jury, when you say Tony Makris  
22 became part of that hate toward the NRA and you, is this the  
23 same Tony Makris that was such a close friend of yours that he  
24 went with you when you thought you had cancer?

25 A Yes.

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 Q So, let's talk about this conflict between the NRA and  
2 Ackerman McQueen that precipitated this.

3 So, you testified that you started looking at  
4 Ackerman's out-of-pocket expenses, I think; right?

5 A We started looking at everything, involving Ackerman  
6 McQueen. It started in 2017 when I started to look at their  
7 online TV platform, which was costing NRA 20-some million  
8 dollars and I started to ask about whether we're getting value  
9 out of it. And, so, it started there and it just continued  
10 downhill all the way.

11 Q Can you describe the extent to which in 2018 the NRA  
12 sought to audit those records?

13 A Yes, we did. I was at a meeting down Ackerman McQueen.  
14 They had nothing but nasty, hateful words to say to me. They  
15 said that the Attorney General can never touch our records.  
16 We're Oklahoma/Texas corporation; and I'm, like, we've got to  
17 see the records and they were just hateful toward me, all kinds  
18 of nasty words.

19 And they -- they also told me that I was crazy to have  
20 sued the attorney -- not the attorney general -- to have sued  
21 the Department of Financial Services and the Governor of New  
22 York, that he was popping the champagne cork. That's exactly  
23 what he wanted and I was stupid fool to have done that.

24 Q Now, when you talk about a lawsuit with the State of  
25 New York, we're not talking about this lawsuit; right?

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 MR. CONLEY: Objection.

2 THE COURT: You can ask.

3 Q Mr. LaPierre, when you talk about a lawsuit between you  
4 -- between the NRA and the State of New York, you don't mean the  
5 case that this jury is sitting in right now; right?

6 A No.

7 MS. ROGERS: I'd like to put up Plaintiff's  
8 Exhibit 2300, just for the witness for identification.

9 I have extra paper copies if the Court would like  
10 one.

11 (Handed up to the Court)

12 MS. ROGERS: It is your exhibit. You should have  
13 it.

14 THE COURT: Do you have one for the witness?

15 MS. ROGERS: Actually, can I give that one to the  
16 witness.

17 (Handed to the witness)

18 Q Mr. LaPierre, you're not on this letter, but do you  
19 recall whether this is a letter you saw in August 2018 from  
20 Ackerman's lawyers?

21 A Yes, I remember this letter.

22 MS. ROGERS: I move to admit it.

23 MR. CONLEY: Objection, hearsay.

24 MS. ROGERS: The witness remembers it. I'm going  
25 to ask the witness's response to it; and, of course, it is a

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 Plaintiff's Exhibit.

2 THE COURT: I guess the question is are you seeking  
3 to admit it for the truth of the matters or just the fact  
4 that these statements were made to him?

5 MS. ROGERS: I'm seeking to admit it to the fact  
6 that the statements were made.

7 THE COURT: All right, I think both on that ground  
8 and -- I do think the fact that it has been marked as a  
9 Plaintiff's Exhibit is relevant to the question, but I'll  
10 admit it. Again, as we did in some other exhibits, whatever  
11 factual statements are made in here are not being offered as  
12 to whether they're true or not, but just that they were said  
13 for these purposes.

14 So, with that caveat, PX 2300 is admitted and you  
15 can publish it.

16 MS. ROGERS: Thank you your Honor.

17 (Plaintiff's Exhibit 2300 was admitted and received  
18 into evidence.)

19 Q Mr. LaPierre, you mentioned -- I think you testified  
20 earlier that Ackerman said to you the Attorney General couldn't  
21 get to them.

22 Is that your testimony?

23 A Yes.

24 Q On seeing this letter refresh your recollection about  
25 some of the things Ackerman was saying about the Attorney

## W. LaPierre - by Plaintiff - Cross/Ms. Rogers

1 General?

2 A Yes. This was a letter from Ackerman McQueen's  
3 attorney that I remember reading at the time. That talking  
4 about it would be stupid for -- that's not what the letter says,  
5 but it is my language. That Ackerman McQueen shouldn't turn  
6 its -- its -- the documentation over to the NRA because they'd  
7 be creating paper trails, which I'm reading from the letter now  
8 New York State Department of Financial Resources or Congress  
9 might be able to get a hold of.

10 Q Now, you testified that you authorized expenditures  
11 through Ackerman that violated my client's policies; right?

12 A I authorized expenditures through Ackerman that  
13 violated -- could you be specific?

14 Q Sure. So, for example, the hair and makeup invoices we  
15 looked at, that was wrong and it shouldn't have happened; right?

16 A Well, I don't think NRA had a policy, policy on it, but  
17 NRA --

18 Q It would be fair to say --

19 THE COURT: Are you finished with your answer? I  
20 just wasn't sure if you were finished with your answer.

21 THE WITNESS: Yes, your Honor.

22 THE COURT: Okay.

23 Q In this letter, Ackerman is telling you, "We know where  
24 the bodies are buried and you don't want to create a paper  
25 trail;" right?

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 MR. CONLEY: Objection.

2 THE COURT: Sustained.

3 Q Mr. LaPierre, do you see where this letter says that  
4 the NRA should proceed with caution in creating paper trails  
5 because of Attorney General subpoenas?

6 A I do.

7 Q Can you describe how you interpreted that message when  
8 you read it?

9 A Well, I interpreted it to be ridiculous because we were  
10 the ones that were trying to see the books and records of  
11 Ackerman McQueen so that we could be in compliance with New York  
12 Nonprofit Law. We wanted to look at everything. It was  
13 Ackerman McQueen that didn't want their records to be looked at.

14 Q And how did you respond to this kind of warning from  
15 Ackerman?

16 A The more they were determined not to let us see their  
17 books and records, the more determined I became to see their  
18 books and records.

19 Q Even though they warned you that you were creating  
20 paper trails that could hurt you; right?

21 A They not only warned me of that, but they said every  
22 nasty cuss word under the sun to me about it over the next  
23 several months.

24 Q And we talked about this a little bit; but in the time  
25 between the NRA began its course correction and the time you

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 announced your resignation, can you describe how the  
2 relationship with Ackerman McQueen changed?

3 A From the time I began the course correction it -- it  
4 went constantly downhill. I mean, it started with me asking  
5 questions about what value we're getting for the TV platform.  
6 Then Mr. Spray who I thought was terrific and doing a great job  
7 went down there, started asking about what are we paying for,  
8 what are we getting. They called me on the phone, spent an  
9 entire day on the phone trying to get me to fire Craig Spray,  
10 which I said I'm not going to do. He's doing a great job.

11 Then, I went down there. It just ended up with them  
12 cussing at me and telling me they weren't going to let us look  
13 at their books and records, and I was stupid -- as I said -- sue  
14 the Department of Financial Services.

15 And then there was a meeting in October of 2018 where  
16 -- where I was looking at their budget, and I ended up cutting  
17 their budget from 41 million down to 21 million where they  
18 actually said -- pointed at me and said, you're --

19 MR. CONLEY: Objection, hearsay.

20 THE COURT: Overruled.

21 Q You can continue.

22 A They said -- Ackerman McQueen said, "You're dead to  
23 me." "You're dead to me," and pointed his finger in my face.

24 And after that, we continued on. I made it clear to  
25 Mr. Cotton, the Audit Committee and I was not going to back off



**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 on that, he did not want me to back off on that. We went down  
2 this path together.

3 I met with him on March 30, 2019, and this hatefulness  
4 was continuing when we agreed to pursue it; and I, ultimately,  
5 filed a books-and-records case in Virginia against Ackerman  
6 McQueen to see their books and records. I think it was on  
7 April 12, 2019.

8 Q Thank you.

9 Can you describe any repayments you've made to the NRA  
10 for money Ackerman spent, but might have benefitted you?

11 A Yes. I have gone through the records and I have paid  
12 back to NRA any payment that looking through expense reports,  
13 looking through NRA ledgers, looking through any other records I  
14 could find; and I have paid them all back the NRA with interest.  
15 I have also filed 4720 forms with the IRS paying that back with  
16 interest.

17 Q We talked about --

18 MR. CONLEY: I'm sorry. Objection to that answer  
19 and move to strike to the extent he's describing the process  
20 of repaying back these expenses. This isn't the sword and  
21 shield release --

22 MR. CORRELL: Your Honor, there's no sword and  
23 shield release with respect to Mr. LaPierre. He has not  
24 invoked any privilege that would warrant any blocking of any  
25 information from the jury.

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 Q Just to be clear, Mr. LaPierre --

2 THE COURT: Overruled.

3 Q Just to be clear, Mr. LaPierre, I don't think you have;  
4 but I will instruct you don't tell the jury about any legal  
5 advice you got or private conversations you had with lawyers  
6 about what was legal, but you can tell the jury what you did;  
7 okay?

8 A When I first started down this course correction and I  
9 didn't know whether any investigations were coming or not. It  
10 had been mentioned to me from a board member that New York State  
11 Nonprofit Law changed a lot. That former Attorney General of  
12 New York Schneiderman had called that board member and told him  
13 there were people putting pressure to -- to use the government  
14 in New York State to try to destroy the NRA, and we --

15 THE COURT: I think the question was just about  
16 repayments, right?

17 MS. ROGERS: I was sort of giving him an  
18 instruction on privilege. I didn't elicit that directly.

19 THE COURT: The initial question was just about the  
20 repayment, so let's stick with that.

21 MR. CONLEY: We object on hearsay.

22 Q Mr. LaPierre, without getting into politics, can you  
23 describe the kinds of expenses you repaid to the NRA?

24 A Yes. I told the NRA when we first started down this  
25 path I made it very clear if there were any calculations that

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 were done incorrectly, if there were any mistakes that have been  
2 made, if I was completely unaware of it, if anything was found  
3 where I received an advantage, I received a benefit, I wanted to  
4 pay it back with interest, which is what I did.

5 Q We talked -- you talked this morning with the Attorney  
6 General about a charity in northern Virginia called Youth for  
7 Tomorrow.

8 Do you recall that?

9 A Yes, I do.

10 Q And your wife is on the board of that charity; right?

11 A Yes.

12 Q Can you describe the financial relationship between  
13 your wife, Susan, and Youth for Tomorrow?

14 A Susan is a complete volunteer, is not paid a penny.

15 Q To your knowledge, are any other NRA board members  
16 involved with Youth for Tomorrow?

17 A Colonel North is on the board -- was on the board. I  
18 don't know whether he still is.

19 Q Without naming any of them, to your knowledge are any  
20 NRA donors involved in these events with Youth for Tomorrow?

21 A Yes. We brought in many, many of our high donors for  
22 these events. That was coordinated by our Office of Advancement  
23 bringing in the high donors.

24 Q Now, we saw the Attorney General introduce evidence  
25 that Ackerman McQueen was getting paid for something it did in

## W. LaPierre - by Plaintiff - Cross/Ms. Rogers

1 connection with Youth for Tomorrow.

2 Do you recall that?

3 A Yes, I do.

4 Q And you testified that you thought Ackerman was doing  
5 that work for free; right?

6 A I thought they were doing that for free.

7 Q And something about accepting a volunteer award; right?

8 A Yes.

9 Q Can you explain that to the jury?

10 A Yes, Nader Tavangar, who worked for Ackerman McQueen  
11 actually was given the Volunteer of the Year Award because they  
12 thought they were doing it for free.

13 Q When you say "they thought they were doing it for  
14 free," you mean Youth for Tomorrow thought that Ackerman was  
15 volunteering for that?

16 A Yes, to help the kids.

17 Q Did Ackerman ever tell you they weren't volunteering  
18 and charging the NRA for helping the kids?

19 A No, they didn't. I found that out when we were doing  
20 the 360 degree review.

21 Q We heard testimony earlier that Josh Powell received a  
22 raise which you might not have authorized. Do you recall that  
23 discussion?

24 A I do.

25 Q And have you had heard the phrase "Wayne said

## W. LaPierre - by Plaintiff - Cross/Ms. Rogers

1    approvals" before?

2           A     I have.

3           Q     Can you describe to your understanding between the time  
4    the NRA started its course correction and the time you announced  
5    your resignation, how did practices change regarding "Wayne said  
6    approvals?"

7           A     Craig Spray told the entire building there were no more  
8    "Wayne said" and I agreed with that and backed him completely  
9    because I never wanted a culture "Wayne said." I knew it  
10   happened, but I never wanted it; and he made it very clear there  
11   were no more "Wayne says."

12                    There was, also, no more signature machine, which was  
13   being abused.

14           Q     When you say the "signature machine," that's a machine  
15   that creates a handwritten signature, but you're not the one  
16   doing it; right?

17           A     That's correct.

18           Q     On Friday you explained a little bit about your thought  
19   process when you authorized the NRA's bankruptcy. Do you recall  
20   that discussion?

21           A     Yes, I do.

22           Q     And do you recall describing New York as a hostile  
23   environment?

24           A     I did.

25           Q     Can you explain to the jury what you meant?

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 MR. CONLEY: Objection.

2 THE COURT: Overruled.

3 Q I went into this whole process and whether there was  
4 going to be review or not by -- by New York State or whatever.  
5 I went into this whole process thinking, okay, look, let's look  
6 at everything. Let's look at every employee. Let's look at  
7 myself.

8 If there's anything we're doing that's not in  
9 compliance with New York law, let's correct it because as I  
10 understood it, New York had a safe harbor provision. If you  
11 were out of compliance or you had overrides and you corrected  
12 the course and you came into compliance with your obligations,  
13 that's what New York law required you to do.

14 I was shocked at -- well, the way -- the way the  
15 attacks started to proceed --

16 THE WITNESS: Your Honor, I don't know how much of  
17 this I can go into?

18 THE COURT: I haven't sustained any objections.

19 Q Answer the questions truthfully. If there's a problem,  
20 the judge will tell you.

21 A First, it started -- first, New York State opened an  
22 investigation on our Carry Guard program.

23 Q That was an insurance program?

24 A It was an insurance program.

25 MS. CONNELL: Your Honor, I'm sorry, I'm just going

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 to object to this. We brought this up and it came up  
2 earlier in the summer. To the extent we're going to get  
3 collateral matters --

4 THE COURT: I ruled that he could answer exactly  
5 these questions.

6 MS. CONNELL: Your Honor, I think your ruling --

7 THE COURT: My, my point was he can answer; but  
8 we're not going to bring in collateral evidence on any of  
9 these points, but he can -- if asked why he did it or did  
10 these things, he can answer.

11 That was my ruling.

12 MS. CONNELL: Your Honor, please note our  
13 exception.

14 THE COURT: Noted.

15 Q You can answer.

16 A The next thing that happened was was the fact that we  
17 started to receive -- we received letters from the Department  
18 of Finance. We didn't receive them. Our banks, our insurance  
19 companies, our infinity partners received letters from the  
20 Department of Financial Services on the Governor's side of New  
21 York State saying that it was a risk factor to do business with  
22 the NRA and that that would be taken into consideration.

23 Our banks, our insurance companies understood those  
24 threats and they started to break relationships with us.

25 The next thing that happened is we, we -- there were

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 press conferences that were held by Governor Cuomo about  
2 attacking the NRA, and there were guidance letters following up  
3 to the banks and the insurance companies.

4 So, it started to look like everything that had been  
5 described to us was actually starting to happen.

6 Then, the next thing that would happen is the Attorney  
7 General -- when the Attorney General is running for Attorney  
8 General, made the statement that she believed we were a criminal  
9 terrorist organization. She was going to open up an  
10 investigation.

11 I still felt like, okay, look, we're complying with the  
12 law. We're doing everything we can to check everything, do  
13 everything under our responsibility.

14 And my first deposition was in New York, was in  
15 June 2020; and what really shocked me because, I don't know, you  
16 know, I'm -- I'm just a kid still at 70 or 69 that believed --  
17 well, believed in what -- in the law. I didn't get one question  
18 during my deposition about our course correction, how much we  
19 were doing on compliance, how much we had done in 2020, in 2019,  
20 how we already had compliance seminars.

21 It was just this ill will toward the NRA going back to  
22 stuff we -- we, by and large, corrected and to the point where I  
23 just felt like we weren't dealing with a fair regulatory playing  
24 field in New York State.

25 And then the next thing was in August of 2020 when the



1 New York Attorney General filed to dissolve the NRA, seize its  
2 assets in what I honestly felt was in an attempt to fulfill a  
3 campaign promise, which is what she said during the campaign.

4 Q Now when it comes to the bankruptcy, we heard a lot of  
5 questions about whether you told certain people you were going  
6 to file, like, whether you told John Frazer or Craig Spray.

7 Do you recall that testimony?

8 A I do.

9 Q Why didn't you talk more explicitly with more people  
10 before filing bankruptcy?

11 A I talked with the SLC, the Special Litigation  
12 Committee. I talked with bankruptcy counsel, and I didn't tell  
13 more people because we -- based on everything we saw from New  
14 York State's Attorney General office, we felt that if it leaked  
15 and the SLC felt that if it leaked, the Attorney General might  
16 go to a judge and try to get a receivership and take over the  
17 NRA and I wanted to protect the NRA. I thought it was a proper  
18 business judgment for me to protect the NRA.

19 (Continued on next page)

20

21

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**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 Q Let's look at Plaintiff's Exhibit 603 which is tab --

2 A May I say one other thing?

3 Q Of course.

4 A That was for the future though as I've said. It wasn't  
5 for the past. Everything -- I was trying to get the NRA on a  
6 fair level regulatory playing field for the future.

7 We would still -- NRA would still have to deal with  
8 this case right here that we're in here today, and I would still  
9 have to deal with the lawsuit that had been filed against me by  
10 the Attorney General's Office, and neither the NRA or myself  
11 would get any advantage from that by filing for the bankruptcy  
12 which was actually a reorganization.

13 Q And can you explain how -- how you saw it as different  
14 for the NRA to go to Texas and you to face the lawsuit here?

15 A How I thought it was different?

16 Q Right. The distinction you saw.

17 A Well, I thought NRA would be dealing with a fair  
18 regulatory playing field in Texas which would be a good thing  
19 for the organization.

20 I actually felt that NRA her complied with it's  
21 obligations in New York in terms of all the 360 course  
22 corrections.

23 I actually -- and I had to in terms of paying back  
24 everything where I received any benefit or calculation or  
25 mistake was made, and I honestly felt the Attorney General

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 should be enthusiastic about the work we had done and patting us  
2 on the back under New York State Law.

3 Q Let's look at Plaintiff's Exhibit 603 which is Tab 104  
4 in your binder.

5 You looked at this with Mr. Conley a minute ago. There  
6 is --

7 THE COURT: We have about 10 minutes before the  
8 break.

9 MS. ROGERS: And this will be short.

10 Q Mr. LaPierre, do you recall testifying about this memo  
11 which you wrote to the Officers' Compensation Committee  
12 explaining that you intended to pay executive bonuses even  
13 though the committee hadn't recommended any?

14 A Yes, I do.

15 Q I want to direct your attention to the first paragraph  
16 underneath Linda Crouch's name. Linda Crouch is the head of  
17 human resources at the NRA; right?

18 A Yeah. That's correct.

19 Q And I'm directing your attention to where you write,  
20 "Notably, the aggregate amount of these bonuses is roughly half  
21 the amount of the EVP bonus that I willingly foregone."

22 Do you see that?

23 A Yes, I do.

24 Q How did the officers react when you told them that you  
25 -- that you wanted to pass up your bonus so that people like

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 Craig Spray and Linda Crouch could get one?

2 A They -- they -- well, they reacted -- I think they  
3 thought it was a good thing I did.

4 I also starting in 2020 took my salary down to 80  
5 percent of what it was, and I -- I did not receive any bonuses  
6 from that point forward.

7 Q On Friday, the Attorney General showed you some old  
8 post-employment severance agreements.

9 Do you recall that?

10 A Yes, I do.

11 Q They asked you whether the NRA would be stuck with  
12 paying you if you weren't reelected or if you retired.

13 Do you remember that?

14 A I remember that.

15 Q And to your understanding, what is -- what are the  
16 terms of your current agreement with the NRA?

17 A My current agreement with the NRA is -- is if I retired  
18 or if I let the NRA or if the NRA was not reelected, at their  
19 option, not mine, they could use my name and my image and my  
20 signature to help them raise money if they decided to on their  
21 own, and I think the payment would -- if they decided to do  
22 that, would have been \$500,000.

23 Q Let's put up Plaintiff's Exhibit 572 which is already  
24 in evidence.

25 This is -- is this your current employment agreement

## W. LaPierre - by Plaintiff - Cross/Ms. Rogers

1 with the NRA, Mr. LaPierre? And we can flip --

2 A Yes, it is.

3 Q And to your understanding, you were not entitled to a  
4 penny from the NRA under any of those old contracts that this  
5 contract replaced; right?

6 A That is correct.

7 Q Now, as you -- you noted that you understand the NRA  
8 has an option to use your name and likeness under this contract.

9 You announced your resignation before this trial  
10 started; right?

11 A I'm sorry.

12 Q That was my fault. The question was muddled. I'll ask  
13 it more clearly.

14 You announced your resignation before this trial  
15 started; right?

16 A Yes, I did.

17 Q Can you describe for the jury, what if any money or  
18 benefits you've been offered by the NRA since you announced you  
19 were resigning?

20 A I have not been offered anything.

21 Q Can you think of any burdens or payments that you feel  
22 entitled to or that the NRA is stuck with now that you're  
23 stepping down?

24 A None.

25 MS. ROGERS: Nothing further.

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 THE COURT: Why don't we take the -- our lunch  
2 break now. We will reconvene at 2:15.

3 Again with the witness, you're still on the stand,  
4 so please don't discuss your testimony during the break.

5 Thank you all. See you soon.

6 THE COURT OFFICER: All rise. Jury exiting.

7 (Whereupon, at this time the jury exits  
8 the courtroom.)

9 THE COURT: Just a couple of quick things in terms  
10 of the sword and shield.

11 As I mentioned when we talked about this all  
12 before, it's -- the best way to evaluate is to see what  
13 questions he answers and then that is what dictates whether  
14 questions that are legitimately brought to cross-examine  
15 those answers are rebuffed by reference to attorney/client  
16 privilege.

17 So the witness testified to a lot of things and  
18 including an interpretation of New York Law and a bunch of  
19 other things about repayments and seems to me that the  
20 decision point is when the Attorney General cross-examines  
21 those and to see whether there are particular points that  
22 they want to question him on.

23 I will say also, you know, this is part of my  
24 weekend. I was working on jury instruction. Things such as  
25 repayments have multiple possible relevance here. One of

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1       which is potentially as a setoff.

2               The burden of proof on that will be on the  
3       defendants as to the extent that repayments are going to  
4       have to be shown. They will have to be proven. So just --  
5       this oral testimony probably wouldn't be sufficient. So we  
6       will see what the evidence is one way or the other, but --

7               MR. CORRELL: Your Honor, we are prepared to do  
8       that in our case in chief.

9               THE COURT: Yeah. So -- right. That's my point  
10       about the sword and shield is that you see what the witness  
11       is able to testify to and then I'll see whether your cross  
12       is hampered.

13              MS. CONNELL: Your Honor, thank you. We can cross  
14       him, but we don't even have the information to effectively  
15       cross him.

16              If he says I stood up, I looked at everything and  
17       paid back everything, we got a repayment in December of  
18       2023, and this is --

19              THE COURT: Like I said, I'm guided by the scope of  
20       his testimony, and you can ask your questions as to cross  
21       that. And if my conclusion is that you are being blocked  
22       from being able to fairly cross-examine what the witness  
23       said without objection, I think I have the tools to handle  
24       that.

25              MS. CONNELL: Your Honor, I just note one thing.

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1           Sometimes Mr. LaPierre, for example, may not have  
2           been the person in charge of determining something and we  
3           asked multiple witnesses for that information and received  
4           privilege as a block in those instances. So our efforts to  
5           establish, for example, how they calculated the amounts he  
6           repaid for flights which is an example we put in front of  
7           your Honor numerous times, Mr. LaPierre may say, oh, yeah, I  
8           looked at everything and I paid everything back. It's the  
9           characterization that we objected to, not the amount for  
10          setoff.

11           We agree that's important and relevant, but it's  
12          that characterization, and we can't unring the bell, the  
13          fact that the defendant has made an election to say this is  
14          hidden behind privilege is an election they are free to  
15          make, but that precludes them from making representations  
16          like that we would suggest to you.

17           THE COURT: It could be one of two ways. It could  
18          either lead to an instruction that that evidence can't be  
19          considered because of the block or it could be that you're  
20          entitled to receive anything that you need to properly  
21          cross-examine.

22           I mean, I was not prepared to make that call until  
23          I heard what the evidence actually coming in is because it  
24          was in my view kind of hypothetical when it was all raised  
25          in advance which I did think it was helpful because I like



**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 to have this teed up, but sword and shield, it kind of  
2 depends on what the sword looks like. And so this would be  
3 the sword. This is the affirmative use of various things,  
4 and I'll evaluate it as we proceed.

5 MS. CONNELL: Thank you, your Honor. Again, I  
6 would just note it was hard to unring the bell once the jury  
7 hears something.

8 MS. ROGERS: In that extensive briefing, we cite  
9 numerous portions of the corporate representative deposition  
10 covering the same agreement and that the distinction we have  
11 attempted to draw with Mr. LaPierre is what did you do, not  
12 what did the lawyers tell you about it, but we understand  
13 the Court's guidance.

14 THE COURT: Right. At this point now he's  
15 testified about, you know, or generally as to what he paid  
16 and they can probe what his process was and you can -- you  
17 know, to the extent that he's asked that, I would not  
18 expect -- you know, if they say, You testified that you did  
19 this. How did you come up with that?

20 If you -- if -- if there is an assertion of  
21 privilege to block him from answering that question to  
22 probe, well, how did you determine what to do, then we may  
23 have an issue.

24 MS. ROGERS: We understand, your Honor, and I think  
25 we would try to cabin our objections the same way I tried to

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 cabin my objections to my questions to him on the stand.

2 You can say what you repaid. Don't say what legal  
3 advice you received.

4 THE COURT: That's where it gets a little trickier  
5 because he did say that he made a determination that  
6 everything that he thought was inappropriate was paid back,  
7 and I think they can ask what went into that.

8 MS. ROGERS: We understand, your Honor.

9 THE COURT: Okay. See you at 2:15.

10 MS. CONNELL: Thank you, your Honor.

11 (Whereupon, at this time there was a luncheon  
12 recess.)

13 A F T E R N O O N S E S S I O N

14 \* \* \* \* \*

15 THE COURT: So before we start, there was one part  
16 of the testimony I wanted to just raise briefly.

17 Since there was the entity CEO responding to a  
18 question from the entity, I just wanted to make sure I  
19 understand what the legal position is, but during the latter  
20 part of the testimony in response to the question about the  
21 hostile environment in New York, the witness said among  
22 other things "If there is anything we are doing that's not  
23 in compliance with New York Law, let's correct it because as  
24 I understood it, New York had a safe harbor provision. If  
25 you were out of compliance or you had overrides and you

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 corrected the course and you came into compliance with your  
2 obligations, that's what New York Law required you to do."

3 So I've been working on jury instructions including  
4 instructions on the relevance of course correction kind of  
5 information. That is not consistent with -- well, first,  
6 the only safe harbor provision that I'm aware of is the  
7 ratification provision which is much narrower than that. So  
8 does anyone on the defense side -- is that an instruction  
9 that you're seeking or is that -- again, I don't want to be  
10 too hard on a non-lawyer sort of expounding on things, but  
11 that's the first thing the jury has heard from anyone as to  
12 some New York Law, and it's -- and how it -- and to what  
13 extent course corrections are relevant, and it sounded to me  
14 like it was described as a complete defense to everything  
15 that came before it.

16 MS. ROGERS: So that's not the NRA's legal position  
17 on certainly any of the discrete statutory charges.

18 I think depending upon how the amorphous and proper  
19 administration charge is shaped --

20 THE COURT: Well, it won't be amorphous when I'm  
21 done with it.

22 MS. ROGERS: Right. So that's what I mean.  
23 Depending upon the form that amorphous crystalizes into  
24 depending upon the breadth of that; it might be part of that  
25 reasoning.

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 THE COURT: Part of it.

2 What I had said before to you all as a general  
3 matter, and this is what I'm baking into the instructions  
4 that I'm writing now is that it will be up for the jury, you  
5 know, with respect to subsequent actions that, you know, the  
6 relevant question on all the alleged violations to the  
7 extent state of mind is a piece of it such as good faith or  
8 ordinary care or whatever it might be is the state of mind  
9 at the time of the violation, and what I am proposing is if  
10 you find that subsequent actions bear upon or are relevant  
11 to someone's state of mind at the time of the events being  
12 challenged, then you can certainly take that into account.  
13 And if you find that it is not relevant to their state of  
14 mind at the time, then you should not. That's how I have  
15 thought about the -- these things.

16 Now it may be slightly different with the NRA as an  
17 entity, and you know -- but I still think the challenges in  
18 the complaint are to specific conduct and transactions that  
19 occurred over time.

20 So the question of whether -- you know, changing  
21 policies in the future, if the jury concludes, well, that  
22 shows either the NRA or somebody else's state of mind at the  
23 time, I have left open the argument that you can make that,  
24 and I think there is some support for this, that if somebody  
25 is genuinely surprised by a violation and immediately

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 corrects it, that subsequent action could bear on a jury's  
2 finding as to whether they were acting in good faith at the  
3 time, but it's a very fact specific kind of analysis. And  
4 it's certainly not what this description is which is that if  
5 you correct it and come into compliance going forward,  
6 that's a safe harbor.

7 MS. ROGERS: We understand, your Honor, and I think  
8 the entity was not trying to assert or elicit a legal  
9 position and what I think we got was a lay understanding of  
10 the law.

11 That question was honestly aimed at eliciting what  
12 we had discussed before. And if you look at the wording of  
13 the question, it wasn't tell the jury, you know, what a safe  
14 harbor is in New York. It was tell the jury what you meant  
15 by hostile.

16 THE COURT: I'm not inclined to do a curative I  
17 don't think right now because I want to very carefully craft  
18 what I want to say to them on this issue because its become  
19 obviously a fairly important issue in the defense. And you  
20 know, I -- I don't know whether they -- whether it resonated  
21 with them at all, but it's something that will have to be  
22 corrected.

23 MS. ROGERS: I think very concisely our legal  
24 position is, you know, when it comes to these discrete  
25 statutory items like 715, the ratification defense

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 co-extensive with 715J, and it's very specific. When it  
2 comes to business judgment rule, willfulness and a couple of  
3 other items that have a mens rea type of element, then I  
4 think your Honor has specified the manner in which remedial  
5 measures can be considered questions which is do they shed  
6 light as Learned Hahn said in these Second Circuit cases on  
7 scienter essentially, but the third prong context in which  
8 we submit is irrelevant is depending upon the morphology of  
9 the amorphous charge, right, depending upon what improper  
10 administration ends up meaning, if it just means, you know,  
11 do you think they did anything improper --

12 THE COURT: Well, I will tell you this. I don't --  
13 I'm not sure exactly what the verdict form is going to look  
14 like. But hypothetically, if you -- and by the way; proper  
15 administration is a phrase that has been used in the  
16 surrogates world for hundreds of years or at least a hundred  
17 years.

18 MS. ROGERS: But it's a interim charge usually --

19 THE COURT: Yeah, and it talks about the level of  
20 care that one uses in administering an estate, for example,  
21 or a trust, but whatever it is. You know, you can  
22 improperly administer an estate in 2016 on a Thursday. In  
23 other words, it can be a thing that you do that on that  
24 Thursday, you've improperly administered the trust by doing  
25 X, Y or Z. Right. So to that extent, it's the same thing

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 as applying subsequent events as you would under the  
2 fiduciary or under the MPCL in that if you improperly  
3 administer the fund on a Thursday in 2016, the fact that you  
4 three years later have a new set of procedures and are  
5 changing your stripes or whatever it is you're doing doesn't  
6 mean that you didn't improperly administer the trust in 2016  
7 on a Thursday.

8 MS. ROGERS: Right. And I think that if this does  
9 start resembling -- if the ultimate charge resembles that  
10 kind of trust and estates surrogate court's version of  
11 estate and administration, then obviously that will guide  
12 how the jury thinks about it.

13 Part of the reason that our presumption has been so  
14 broad, we don't know exactly what it's going to look like,  
15 and in some of the motion practice and pleadings, it seems  
16 like there's a version of improper administration proposed  
17 by the Government which is just let's throw everything at  
18 the wall that seems expensive or improper in any way, and if  
19 that were the charge, then we would -- then the entity's  
20 position would be then you get to consider everything proper  
21 that we did too. And so I think a lot of this comes down to  
22 what the charge looks like.

23 THE COURT: Yeah. And look, I've been watching the  
24 evidence come in to help me craft the charge. And you know,  
25 we will see.

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1           So you're saying it's sort of a binary question you  
2 think that you either have improperly administered the fund  
3 during this entire era or you haven't.

4           MS. ROGERS: I don't think it necessarily needs to  
5 be binary.

6           So if the Court is guided by the trusts and estates  
7 surrogate use of improper administration, then we would say,  
8 you know, maybe the form of the charge, the limiting  
9 principle derives from that body of law, and it looks a  
10 little more in rem. It looks like were the charitable  
11 assets misspent, for example.

12           I think that even regardless of what the charge  
13 looks like, it doesn't need to be a crisp binary because,  
14 for example, if the Court is looking to fashion injunctive  
15 relief that takes into consideration the jury's findings,  
16 you know, one way to craft a verdict form that doesn't have  
17 that open-ended continuing harm thing on it but still takes  
18 account of relevant facts might be do you think the fund was  
19 improperly administered in 2018, 2020. Those are crisp jury  
20 questions.

21           THE COURT: Look, I think inevitably all of this  
22 stuff, a lot -- certainly more important or directly  
23 relevant to the second phase, if there is one, on  
24 non-monetary remedies. I think we have always understood  
25 that, but you're putting a lot of that in here which I have



**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 permitted on this theory that a post -- that subsequent --  
2 subsequent actions can be used by a fact finder in  
3 determining, you know, was this a good faith decision back  
4 in the day and now we are seeing their true colors or is  
5 this just a, you know, deathbed conversion or something like  
6 that.

7 So I -- you know, I'm continuation to think about  
8 it, but I -- I do read the complaint to allege a lot of  
9 examples that they claim are improper administration which  
10 would be individual violations. Not just one big blob of --  
11 but I'm curious. I mean, we are going to have more  
12 discussions about this. But whatever it is, it's not a safe  
13 harbor. And again, I'm not being too hard on Mr. LaPierre  
14 in the back as a non-lawyer, but I get -- my ears perk up  
15 when I hear legal principles told to the jury about a very  
16 central aspect of the defense, and it's not accurate.

17 MS. ROGERS: We understand, your Honor.

18 Just to clarify, again, you know that, I don't  
19 think is what the question was targeted to elicit or what we  
20 wanted to elicit, and I don't -- Mr. LaPierre's testimony is  
21 fact testimony by an individual defendant. It's not the  
22 entity putting our legal position before the jury.

23 THE COURT: So what I may say is I just may mention  
24 that in the course of the testimony the, witness gave a view  
25 about New York Law. Just to be clear, he is here to testify

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 about facts, and I will tell you what the law is, and you  
2 know, what I'm leaning -- what I wanted to say, what I came  
3 out here kind of thinking about was to say there is no safe  
4 harbor provision such as is described. There are other  
5 provisions that I will tell you about at great length.

6 MS. ROGERS: I think some kind of instruction that,  
7 you know, I will give you -- I will tell you what the law  
8 is, and the witness is giving fact testimony, we would  
9 actually agree is appropriate. I think until the charge is  
10 finalized, you know, we would -- the NRA would disfavor any  
11 instruction that there is no safe harbor.

12 THE COURT: Well, not the safe harbor that the  
13 witness described.

14 MS. ROGERS: But I think an instruction that the  
15 witness is giving fact testimony, he is not a lawyer, and  
16 even if he was, you get the law from the judge is entirely  
17 appropriate.

18 MS. CONNELL: Your Honor --

19 MR. CORRELL: I think that's the way to address it.  
20 That would be acceptable to Mr. LaPierre.

21 THE COURT: But it doesn't correct it.

22 MS. CONNELL: Thank you for pointing that out.

23 We would ask for a curative instruction.

24 I would just note that, and just remind everyone  
25 that on December 14 the Appellate Division, First Department

**W. LaPierre - by Plaintiff - Cross/Ms. Rogers**

1 upheld your ruling that the Plaintiff had stated a claim  
2 under the EPTL for past violations and conduct as alleged in  
3 the complaint.

4 THE COURT: I don't want to --

5 MS. CONNELL: I don't want to get into that either,  
6 but I think a curative instruction in the law is not as Mr.  
7 LaPierre stated. He's a layperson, and the Court will  
8 explain to you would take care of that.

9 THE COURT: I think I have to say something because  
10 if they are going to spend the rest of the trial hearing  
11 nothing else other than there is a safe harbor for course  
12 corrections, I think that's problematic.

13 MS. CONNELL: I too, your Honor.

14 THE COURT: I will explain it to them. I think I  
15 can do it. I'm not going to throw anybody under any buses,  
16 but I don't want them to be laboring under a  
17 misunderstanding.

18 MS. CONNELL: I appreciate that.

19 THE COURT: Everybody agrees with that.

20 MS. CONNELL: That's right.

21 MR. CORRELL: My concern is that a layperson might  
22 well view ratification of past related-party transactions as  
23 a sort of safe harbor. A layperson might view --

24 THE COURT: Well, it is. That's the -- that's not  
25 the issue. The -- by safe harbor, it's a complete defense.

1           It says it. That's not the context of the testimony.

2                           (Continued on the following page.)

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## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 MR. CORRELL: I understand, and I think to the  
2 extent you're talking about related-party transactions which  
3 is quite a focus of this case, that it is arguable that  
4 there is a safe harbor for related-party transactions.

5 THE COURT: I think there's too much of a risk.  
6 I'll do it in a way that just makes it clear that, you know,  
7 I will tell them about the claims and defenses and that  
8 the -- that they should not consider any testimony from  
9 anyone about what New York law is and -- look, I just think  
10 the notion that there is a safe harbor defense is just  
11 inaccurate enough that I need to say something about it, but  
12 it won't be designed to suggest that it is irrelevant and  
13 I'll explain that.

14 All right, let's bring the jury in.

15 MR. CORRELL: Your Honor, before we call the jury,  
16 Mr. LaPierre is prepared to go till three o'clock. Can we  
17 take the break at three?

18 THE COURT: I've spent fifteen minutes already on  
19 this, so can we have a little bit longer?

20 MR. CORRELL: Yes, your Honor.

21 THE COURT: You're questioning now, right?

22 MR. CORRELL: Yes.

23 THE COURT: So that should be a little easier. If  
24 it's not, that's a problem.

25 MR. CORRELL: He does kind of hit a wall at

**W. LaPierre - by Plaintiff - Cross/Mr.Correll**

1 three o'clock. His eyes start closing.

2 THE COURT: I understand. I'll let you take the  
3 lead at that point; and at three, if you feel like things  
4 are still going okay, we'll keep going for a little bit  
5 longer.

6 MR. CORRELL: We'll go as long as we can.

7 THE COURT: Okay.

8 (Whereupon at this time the witness,  
9 WAYNE LAPIERRE, having been previously duly sworn/affirmed  
10 by the Clerk of the Court, resumed the witness stand and  
11 testified as follows:)

12 COURT OFFICER: Court ready to receive the jury,  
13 your Honor?

14 THE COURT: Yes.

15 COURT OFFICER: All rise, jury entering.

16 (Whereupon, at this time the jury entered the  
17 courtroom.)

18 (Continued on next page)

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**W. LaPierre - by Plaintiff - Cross/Mr. Correll**

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MR. CORRELL: May I proceed, your Honor?

THE COURT: Before we start, just a very brief note.

As you remember at the instructions at the beginning, I said that the only instructions you'll get about the law will come from me.

So, occasionally, witnesses will venture into questions about the law, and there was just a short segment of Mr. LaPierre's testimony where he referenced New York having a safe harbor provision or something along those lines. This is not a criticism because people shouldn't be held to strict standards of legal scrutiny just in giving lay testimony. Again, the only instructions you get on the law should be from me.

There are claims and defenses, I'll explain those to you at great length when we get to the end. There is no safe harbor provision in the way that was described, but there are defenses that you will be able to take into account; but I didn't want you to be led to believe that that is the law that you will hear from me at the end. It will be different from that.

And so I just wanted to just reiterate that instruction that even though sometimes witnesses will talk about the law, often times there will be an objection. This

**W. LaPierre - by Plaintiff - Cross/Mr. Correll**

1           time there wasn't, but I just wanted to make sure you're not  
2           blocking in on any particular statement of the law  
3           prematurely until I can explain it to you at the end. Okay.

4                       All right, Mr. Correll.

5           **CROSS-EXAMINATION**

6           **BY MR. CORRELL:**

7           Q       Good afternoon, Mr. LaPierre.

8           A       Good afternoon.

9           Q       I'd like to take you back to Friday briefly to talk  
10          about a few of the things that Mr. Conley spoke about. You  
11          spoke about security and there were some discussion of  
12          Mr. Staples.

13                    Do you remember that?

14          A       Yes, I do.

15          Q       Who was the head of security before Mr. Staples?

16          A       Russell Gordon.

17          Q       Did you have any conversations with Mr. Gordon about  
18          security?

19          A       Yes, I did.

20          Q       And what, if anything, did he tell you about flying  
21          private?

22          A       We went back and forth for awhile.

23                    MR. CONLEY: Objection.

24                    THE COURT: I'm sorry, say again?

25                    MR. CONLEY: Objection, calling for hearsay.



**W. LaPierre - by Plaintiff - Cross/Mr. Correll**

1           THE COURT: Overruled.

2           A     We went back and forth for awhile. When the threat  
3 went up, he told me to fly private. When the threat went down,  
4 I flew commercial. After about -- after 2013, it was fly  
5 private all the time.

6           Q     And was the fact that the NRA was providing charter  
7 travel to you disclosed in the 990s that were filed with the  
8 IRS?

9           A     Yes.

10          Q     There was some discussion about mosquito treatments at  
11 your home.

12          A     Yes.

13          Q     Can you explain what that was about?

14          A     Well, our house was kind of on a -- in the back was a  
15 lot of sitting water, and the mosquitoes would be just horrible  
16 in the summer and the security people would be out there all  
17 night. They'd walk around and they would just get eaten up by  
18 mosquitoes.

19                 So, the NRA paid for mosquito treatment so that it  
20 would help protect the security people.

21          Q     There was some discussion of landscaping on one  
22 invoice. Do you remember that from Friday?

23          A     Yes.

24          Q     Could you please tell the members of the jury what the  
25 landscaping was for?

## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1           A     Yes.  What the NRA did was they put a bunch of bushes  
2     in so that somebody couldn't run down through the -- straight to  
3     the door.  They also put a wall behind the house in front of my  
4     office so that somebody couldn't shoot into the office from the  
5     back hill.  And then they put up this little fountain to try to  
6     disguise the fact that it was a security wall.

7           Q     Did you ever actually have any security problems at  
8     your house?

9           A     Yes.

10          Q     What kind of problems did you have?

11          A     Well, we were swatted.  I mean, I was home in the  
12     middle of the night with my wife, and the phone rang about 2:15.  
13     It was the Police Department saying, "Come out with your hands  
14     up in the air.  Turn all the lights off."  And we were running  
15     around with our heads cut off, and my wife was going, "Don't go  
16     out there.  Someone is going to kill you."

17                 And I kept running around turning on lights and,  
18     finally, I said, "I'm coming out," and I walked out with my  
19     hands up.  About fifteen police officers with their guns drawn  
20     were charging toward me, and we realized later from the police  
21     what had happened.

22          Q     Did the police take any action to investigate to  
23     determine who did that?

24          A     They did.  They investigated it for a quite awhile.  It  
25     was ready to go to court locally.  That ended up being taken

## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 away. It turned out it was took -- taken away by the FBI, and  
2 they, ultimately, arrested someone.

3 Q And did that person, ultimately, go to jail?

4 A I believe they did. There were many other instances,  
5 also.

6 Q Did you have stalker incidents at your home?

7 A Yes, we did.

8 Q Was that a frequent occurrence?

9 A Yes, it was. There were people taking pictures through  
10 the windows. There were people out there on the streets. The  
11 neighbors called the police several times. We had all kinds of  
12 things happening. We were doxxed.

13 Q What is doxxing?

14 A When they invade all of your bank accounts and your  
15 credit cards and try to apply for all types of things under your  
16 name because they have your credit information and that was  
17 investigated by the FBI, also.

18 Q I want to change subjects. There was some discussion  
19 that you actually were asked a question about --- I think the  
20 question was are you the head of a charity.

21 Do you remember that question?

22 A Yes, I do.

23 Q And I objected and my objection -- on the grounds it  
24 called for a legal conclusion, and that objection was overruled.

25 I believe your answer was that you were head of the

## W. LaPierre - by Plaintiff - Cross/Mr.Correll

1 501(c)(4) organization. Was that your answer?

2 A Yes.

3 Q And you were drawing the distinction between a charity  
4 and a 501(c)(4) organization; correct?

5 A Yes.

6 Q What -- why were you drawing that distinction?

7 A Well --

8 MR. CONLEY: Objection.

9 THE COURT: Overruled. Go ahead.

10 A A charity is it's taxed deductible. There's a  
11 501(c)(3) that's affiliated with the NRA that is a charity. A  
12 501(c)(4), while it is nonprofit, is not tax deductible.

13 Q Does that mean when someone wants to join and send in  
14 dues, they don't get to deduct that from their taxes?

15 A Yes.

16 Q And, so, that's no taxpayer money is being used to  
17 support the 501(c)(4) through member dues; is that a fair  
18 statement to your understanding?

19 A Yes.

20 MR. CONLEY: Objection.

21 THE COURT: Hang on. What's the objection?

22 MR. CONLEY: Leading.

23 THE COURT: I thought it was also a legal  
24 conclusion, but he is the CEO of an entity. I think his  
25 understanding of what it is is I think relevant.

## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 I'll overrule it.

2 A So, in your understanding, is this like donating to say  
3 a Catholic charity?

4 A Catholic charity, I believe, would be tax deductible.  
5 The NRA is not tax deductible. It is nonprofit.

6 Q Or any religious charity would be, in your  
7 understanding, a (c)(3), not a (c)(4)?

8 A That's my understanding.

9 Q There was some discussion of your wife flying with you  
10 on private jets. Do you recall that?

11 A Yes.

12 Q Why did she fly with you on occasion?

13 A My wife was the volunteer unpaid for the Women's  
14 Leadership Forum, which is a philanthropic organization for  
15 women of the organization to raise money and not of the  
16 organization, and my wife would fly with me to represent the  
17 Women's Leadership Forum.

18 Q Can you tell the jury how that came about?

19 A Well, my wife volunteered back in I think it was 2004,  
20 2005 to -- to do this with the NRA because she had a background  
21 in the area. She thought she could -- she knew how to put it  
22 together.

23 Q What was her background?

24 A Fundraising.

25 Q And did she work as a volunteer for the NRA from that

## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 time on?

2 A Yes.

3 Q Is she still working as a volunteer for the NRA?

4 A In someways, not as much right now.

5 Q Is she still involved with the Women's Leadership  
6 Forum?

7 A Yes.

8 Q How much of her time did she spend working on WLF  
9 matters?

10 A Well, back when she was doing it then which was 2004,  
11 2005 up to about 2018, it was virtually a full-time job for her.

12 Q Was she -- was she ever offered -- did anyone ever  
13 suggest that she be paid for her work?

14 A Yes.

15 Q And what did she say?

16 A She said no.

17 Q And did she explain why?

18 A Yes. It was because she thought that if -- if she was  
19 going to be successful at doing what she was doing, which was to  
20 engaging women around the country to step up and give a donation  
21 to help the NRA or programs or whatever it went for, that she  
22 should be on the same equal footing as they should and she  
23 shouldn't be paid.

24 Q Did you have any sense of whether Gayle Stanford was  
25 shopping around to get the best prices on air transport?

## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1           A     That's what I understood, but I really wasn't involved  
2 with it in terms of what she did.

3           Q     Did you ever get any questions from the treasurer, the  
4 treasurer's office as to -- that indicated to you that there  
5 was -- that Gayle Stanford wasn't getting the best price for air  
6 travel?

7           A     No.

8           Q     There was a question yesterday where Mr. Conley showed  
9 you an invoice and it had Hotel ZaZa on it. Do you remember  
10 that?

11          A     I do.

12          Q     Can you tell us anything -- do you know anything about  
13 Hotel ZaZa and what your wife might have been doing taking a car  
14 at seven a.m. to Hotel ZaZa?

15          A     Yes, I believe that's where the Women's Leadership  
16 Forum was holding a brooch ceremony for people that gave --  
17 women that gave a certain amount of money to the Women's  
18 Leadership Forum, and I think she was doing a site visit there.

19          Q     Did you have any understanding at the time as to  
20 whether the time she was spending doing this kind of thing for  
21 the NRA had any benefit for the NRA?

22          A     It had incredible benefit.

23          Q     And what was that benefit?

24          A     Well, over the last ten years, it raised 59 million in  
25 cash and, approximately, another 110, 112 in plain gifts from

## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 what the figures had been provided to me.

2 Q There was talk of MMP on Friday. Do you remember  
3 that?

4 A Yes.

5 Q How much money did MMP raise for the NRA on average  
6 year over year?

7 A Well, it depends on the year. Several years ago they  
8 raised somewhere around 200 million, 215-20 million. In recent  
9 years, it's gone down more to 130, 140, 150.

10 Q What portion of that of what they brought in did they  
11 get to keep under the arrangement that the NRA had with them  
12 roughly on average?

13 A Well, about ten percent in the old days, and now I  
14 believe -- I believe -- I wasn't involved with it. I believe  
15 their new contract is 9 million, and they're raising -- if you  
16 count ILA and PVF, I think they're raising about 130 --  
17 somewhere between 130 and 50 million.

18 Q So, they're a little under ten percent now?

19 A Yes.

20 Q Between 10 and 5?

21 A Yes.

22 Q Did the NRA derive any benefit from the time you spent  
23 with McKenzies on their boat in the Mediterranean?

24 A Yes, what I was trying to do is I was trying to --  
25 there were so many people in Hollywood that were speaking out



## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 against the organization. I felt that NRA needed to compete  
2 because I knew there were a lot of people in Hollywood on our  
3 side. And the reason I took those trips is I was trying to  
4 cultivate celebrities, build relationships with celebrities;  
5 and, also, that was a portal I could go through and end up in a  
6 world I never could have ended up in on my own and I would meet  
7 celebrities.

8 I would build relationships with them and would also  
9 meet wealthy people, that maybe I could draw in to build a  
10 relationship with and get to give NRA quite a bit of money.

11 Q Were you successful in developing any relationships  
12 with any celebrities?

13 A Yes, I was.

14 Q Could you give us a few examples?

15 A Well, I'll give you all kinds; but, I mean, most  
16 recently like Dean Cain, Erik Estrada, Montel Williams, folks  
17 like that, that --

18 Q For the members of the jury who may not know these  
19 names, can you just tell us briefly who each of these people  
20 are?

21 A Yes. Erik Estrada was on the show, I believe it was  
22 Cops.

23 Q CHIPS.

24 A CHIPS, yes, sir. It was about police officers on -- in  
25 Los Angeles that were on motorcycles. It was on a long time,

## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 maybe the most popular show on TV and he was one of the highest  
2 paid actors in the country.

3 Q And CHIPS means California Highway Patrol; correct?

4 A Yes.

5 Q What about Montel Williams?

6 A Montel was one of the longest hosted -- one of the  
7 longest running television shows --- interview shows in the  
8 country, and he was also a naval academy graduate with a lot of  
9 military experience.

10 Q And were you able to persuade Montel Williams to do  
11 anything for the NRA?

12 A Yes, I persuaded all of them to do something for the  
13 NRA. Montel came and spoke to all the high donors at -- 40 or  
14 50 of our highest donors at the convention. Erik Estrada did  
15 safety spots for us in terms of children. He also did episodes  
16 of Crime Strike. He came to our convention. Dean Cain actually  
17 ended up running for the board.

18 Q For those of us who don't know the name Dean Cain, was  
19 he an actor?

20 A Yes, he played Superman.

21 Q And when did he do that?

22 A I think that was probably 15, 18 -- I'm not sure of the  
23 exact year.

24 Q Was that a popular show at the time?

25 A Yes, it was a movie, I believe, and Roger Moore was

## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 another one I developed a relationship with.

2 Q And what benefit did your relationship with Roger Moore  
3 produce, if any?

4 A He was -- the United Nations was trying to talk him --  
5 because he was involved with the UN and being a spokesperson on  
6 a lot of their firearms treaty efforts and things like that, and  
7 I was able to develop a relationship with him, talk to him about  
8 it, make him -- educate him to the point where that ended up not  
9 happening.

10 Q And what roles did he play as an actor?

11 A He was -- for quite awhile he was James Bond in the  
12 movies.

13 Q And did you see some benefit to having a person who  
14 played James Bond not acting as a spokesperson against the  
15 positions you were taking?

16 A Yes, it -- as I've said, the whole reason I did this  
17 was to try to educate celebrities about the NRA and what a good  
18 mainstream organization it was and how much actors in Hollywood  
19 were -- I mean, America is influenced by celebrities in a big  
20 way. That's why you see them on so many TV ads, and I wanted us  
21 to play on that field and not concede that ground to the other  
22 side.

23 I thought that was simply smart in terms of protecting  
24 the NRA and further the mission of the NRA.

25 Q Mr. Conley showed some photographs on Friday. Do you

## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 recall that?

2 A Yes, I do.

3 Q One of the photographs I believe was a photograph of  
4 you in Dubai or somewhere?

5 A Yes.

6 Q I notice some tripods in the background, some camera  
7 tripods in the background. Do you recall that? There being any  
8 filming going on in that trip?

9 A Yes, they used to film a travel show, and they use to  
10 film it wherever they went with, with the -- the people that  
11 went with them.

12 Q And did you ever do any filming on any of those trips  
13 for the NRA?

14 A I did not do filming for the travel show. I did some  
15 standups, in general, and I did some Crime Strike; but I did not  
16 do the travel show.

17 Q When you filled out your financial disclosure  
18 questionnaires, did you believe you were filling them out  
19 correctly?

20 A Yes, I did.

21 Q And when you -- when it came to your attention that you  
22 had not filled them out correctly, did you undertake to go back  
23 through and correct your answers?

24 A I did. I mean, the compliance thing, I wasn't the  
25 compliance guy. I now know that if I was to give anybody

## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 advice, it would be don't transfer that function to anybody.  
2 You need to be an expert on it.

3 But, at the time, I mean, I was learning. I was being  
4 educated and I -- I know on those trips now what I should have  
5 done was either go to the Audit Committee and tell them what I  
6 was doing, why I was there or not go at all. I mean, it -- I  
7 mean, that's what I would do now.

8 Q There was -- Mr. Conley pointed a receipt for handbag  
9 from Bergdorf's.

10 Do you remember that?

11 A I do.

12 Q Can you tell the jury what your thinking was behind the  
13 handbag gift?

14 A My wife building the Women's Leadership Forum in  
15 particular, but I did, too, with employees and with some donors  
16 would to build relationships and continue relationships, we  
17 would give birthday gifts, wedding gifts, holiday gifts,  
18 Christmas gifts. Hostess gifts, if somebody was hosting a  
19 reception.

20 And I put all those on my expenses that I turned in to  
21 NRA because I -- I thought they were the glue in terms of  
22 building relationships and holding things together.

23 Q And at the time you did that, did you have any  
24 knowledge of whether there was a limit on the amount that the  
25 NRA could reimburse people for gifts to employees or vendors or

## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 volunteers?

2 A I did not know at all there was a limit. I now know  
3 there was a limit of \$25. And what I have done is go back  
4 through every one of those expenses, and I have paid all those  
5 gifts back to the organization.

6 Q So, the NRA received a benefit from the gift giving,  
7 but didn't have to pay the price. You ultimately paid the  
8 price; correct?

9 A I paid it back.

10 Q And did you pay the price for that particular bag?

11 A I paid all those gifts back.

12 Q And did you pay interest on that, as well?

13 A I paid interest and I, also, went back and paid taxes  
14 with interest.

15 Q And so you think you're all square with the NRA, at  
16 least on that bag; right?

17 A Yes, I do.

18 Q And on the other things you went back to repay?

19 A Yes, I did. Yes, sir.

20 Q There was -- Mr. Conley mentioned a gift for David and  
21 Laura McKenzie's daughter. Do you remember that one? Did you  
22 pay that one back?

23 A Yes, I did.

24 Q And Mr. Conley mentioned some candlesticks. Do you  
25 remember that?

## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 A Yes.

2 Q Did you pay that one back?

3 A Yes.

4 Q And he also mentioned a Fitbit, a Fitbit store. Did  
5 you pay those back?

6 A I paid all of them back.

7 Q As you sit here today, is there any gift that you gave  
8 that you can think of that you did not pay the NRA back for?

9 A No.

10 Q There was some mention about a golf club on Friday. Do  
11 you recall that?

12 A Yes.

13 Q Can you explain to the jury what, if any, benefit there  
14 was to the NRA for you having a membership to a golf club?

15 A Yes, it was a place I could take supporters. I could  
16 take donors. I could socialize with donors and members. It was  
17 NRA's policy up until about -- until Craig Spray came on board  
18 that that was a proper thing to do.

19 When Craig Spray came in, he informed us that the law  
20 had been changed; and it was not the proper thing to do and it  
21 was all discontinued in 2018.

22 Q And do you still belong to that golf club?

23 A I do.

24 Q And you pay your own dues?

25 A I do.

## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 Q Do you still bring people to the golf club to talk  
2 about NRA business?

3 A I do.

4 Q And I think there might have been some mention that  
5 this golf club belonged to Donald Trump; is that correct?

6 A Not originally, but he ended up buying it.

7 Q Did you ever socialize with him there?

8 A No. I saw him there, waved to him a couple of times,  
9 but I did not socialize with him there.

10 Q Did you have any involvement in the preparation of the  
11 Form 990?

12 A Well, I worked with our tax lawyers, the auditors  
13 worked on it. I worked with our general counsel's office and  
14 I -- and our accounting staff.

15 Q Did you actually go around and collect data from  
16 people, accountants to populate the form?

17 A No, I didn't.

18 Q Did you actually draft the disclosures that were  
19 included in the 990?

20 A I looked at them and worked with the people preparing  
21 them. I did not draft them. I -- I thought it was the most  
22 transparent 990 we've done. It reflected all the work we've  
23 done in terms of what's referred to as the course correction,  
24 so.

25 Q And you're referring to the one that you signed?



## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1           A     Yes.  It was an ongoing process still.

2           Q     There was some talk about Youth for Tomorrow and I know  
3 you mentioned -- talked a little bit about it; but can you tell  
4 the jury whether you believed there was any benefit to the NRA  
5 to having a relationship with Youth for Tomorrow?

6           A     Yes, I did.  The NRA had corporate headquarters in  
7 northern Virginia, and Youth for Tomorrow is one of the most  
8 prominent charities in northern Virginia.  It does an  
9 unbelievable job in terms of saving kids.  It would be  
10 completely lost.  I thought the benefits were, one, to help the  
11 kids; two, to have NRA seen as a really good corporate citizen  
12 in front of all of northern Virginia, in front of the political  
13 class of northern Virginia that came to most of those events.

14                     And we also brought in a lot of our high donors from  
15 around the country to our Advancement Office to participate in  
16 those dinners, and they thought that was a really great thing  
17 for the organization to do, also.

18                     So, I think there were -- and we also got to meet a lot  
19 of people we wouldn't have gotten to meet in terms of potential  
20 donors, and I just thought it was a great business thing for the  
21 NRA to do in a place -- in a corporate place of business  
22 resided.

23           Q     Were you able to interact with legislators in  
24 Washington?

25           A     Yes, there were Congressmen there.  There were local

1 members of the City Council there, the Board of Supervisors and  
2 NRA had requests from time to time going to the Board of  
3 Supervisors and it was just a good thing, in general, for the  
4 NRA.

5 (Continued on next page)

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## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 Q Did military people attend?

2 A Yes.

3 Q And who started that foundation?

4 A Coach Joe Gibbs of the Washington football team.

5 Q Was that a (c)(3) or (c)(4)?

6 A It was a (c)(3).

7 Q And so deductions were or contributions were tax  
8 deductible to Youth For Tomorrow?

9 A Yes.

10 Q There was talk about helicopters today. I'm jumping  
11 back to today.

12 Do you remember that?

13 A I do.

14 Q Why were you in those helicopters?

15 A We were going out to the NASCAR tracks.

16 One of the things I always thought, NRA -- I knew NRA  
17 is about as mainstream an organization you can get. The media  
18 makes it try to sound otherwise, but we probably got a member on  
19 every block in this country, and the other side always tried to  
20 push NRA to the fringe, and I knew that's how the organization  
21 would lose. We didn't want to be there. NRA is not some  
22 right-wing organization, so I tried to build a relationship with  
23 all of these cultural institutions that had an influence on  
24 American society and that would include NASCAR, country music,  
25 the NFL alumni, the NBA, even organizations like Youth For

## W. LaPierre - by Plaintiff - Cross/Mr. Correll

1 Tomorrow, and that would help the NRA in terms of being  
2 culturally relevant and showing America that NRA is a good  
3 citizen, good people and not what they might read about in the  
4 papers.

5 Q And did you have any success with that effort?

6 A Yes, we did.

7 Q And what benefit did it ultimately produce for the NRA?

8 A It produced owners. It produced a lot of good will.  
9 It -- at the NASCAR races, they used to -- just because I  
10 happened to be the position I hold, they used to introduce me at  
11 the drivers meeting to the drivers. So we were able to form  
12 relationships with them.

13 On country -- at the country music, we actually were  
14 able to get the clay shoot on CBS national television at the  
15 Academy of Country Music Awards that they would hold every year.

16 We would get many celebrities come out and shoot at  
17 those events, whether it be Blake Shelton or you could go on  
18 with a whole list of celebrities, but all that in this culture  
19 which is influenced by all these institutions is a good thing  
20 for an organization like ours.

21 Q And did you -- did the NRA have signage and branding at  
22 these events?

23 A Yes, we did.

24 Q Did you pay for the right to do that?

25 A Yes. It depended. At NASCAR, it was -- we did

**W. LaPierre - by Plaintiff - Cross/Mr. Correll**

1 originally and then it was part of our relationship with their  
2 foundation that we would get signage.

3 At the country music, we would get signage.

4 The NFL alumni, we would actually get use of the NFL  
5 alumni logo which was virtually similar to the NFL logo, so it  
6 was all very positive for an organization that you don't want  
7 people to think is some right-wing organization but is deepest  
8 part of the river, the mainstream of society which is what our  
9 organization is.

10 Q Did the NRA donate funds to the Speedway charity that  
11 was associated with the NASCAR events?

12 A We did.

13 Q And what was the Speedway charity?

14 A Speedway Children's Charity is -- NASCAR is kind of  
15 broken up into two kingdoms. There is the France family and  
16 then there was the Smith family that owned about eight or nine  
17 of the tracks and then the France family owned the largest other  
18 group of tracks. So the Speedway Children's charity was the  
19 Speedway motor sports charity.

20 Q Going back to YFT, did your wife and you ever sponsor a  
21 child from A Child At Risk?

22 A Yes, we did.

23 Q And could you just tell me generally what that process  
24 was like, what that entailed?

25 A We got to know her through Youth For Tomorrow. We took

**W. LaPierre - by Plaintiff - Cross/Mr. Correll**

1 her into our home. We went through the process in Virginia of  
2 them okaying for her to spend time in our home, and we tried to  
3 love her, and we tried to give her a chance.

4 MR. CORRELL: I think this would be a good time to  
5 break, your Honor.

6 THE COURT: Okay. Let's take our break, and we will  
7 see you shortly.

8 THE COURT OFFICER: All rise. Jury exiting.

9 (Whereupon, at this time the jury exits  
10 the courtroom.)

11 THE COURT: Can I just ask a quick question. So I  
12 want to make sure I'm informed enough to be able to deal  
13 with any objections that come up. I was never good at tax  
14 which is why I went into litigation, so I don't really know  
15 much about it.

16 You were making a distinction about tax exempt  
17 organizations, I think. The Form 990, at least that I have  
18 looked at now, a lot of them, it's a return of an  
19 organization exempt from income tax.

20 How -- what's the -- and that's all the (c)(4) an  
21 (c)(6) as well.

22 MR. CORRELL: It's tax exempt from I think (c)(1)  
23 to I think (c)(8).

24 THE COURT: What's the distinction that you're  
25 drawing?

**W. LaPierre - by Plaintiff - Cross/Mr. Correll**

1           You're drawing what about contributors can  
2 deduct the contributions from their taxes?

3           MR. CORRELL: A 501(c)(3) organization is  
4 recognized as a charity under federal law, and the money  
5 that you give is tax deductible. You can deduct it from  
6 your taxes.

7           A 501(c)(4) social welfare organization is not --  
8 the money is not tax deductible.

9           THE COURT: But the organization is tax exempt.

10          MR. CORRELL: It's tax exempt from certain things,  
11 but that doesn't mean when someone donates money, they get  
12 to deduct.

13          THE COURT: From the donor's perspective, there is  
14 a difference, but from the entity's perspective in terms of  
15 its organization, it's taxed the same way that the other 501  
16 C's.

17          MR. CORRELL: Not exactly. There may be  
18 differences. I'm not a tax lawyer either. I hated taxes in  
19 law school.

20          As I understand, the rules can vary slightly from a  
21 classic charity which is a foundation which is tax  
22 deductible with certain rules from a (c)(4) which tended to  
23 be a membership organization where you were serving members  
24 rather than widows and orphans. Widows and orphans don't  
25 join a foundation in order to get benefits. Members join a

**W. LaPierre - by Plaintiff - Cross/Mr. Correll**

1 social welfare organization to associate, and the  
2 organization is exempt from taxation for certain things.  
3 Not all things. They pay sales tax, and Mr. LaPierre might  
4 be able to speak better to this than I can.

5 THE COURT: In ways -- would a (c)(3) not pay sales  
6 tax?

7 MR. CORRELL: I believe they do pay sales tax.

8 THE COURT: Maybe it's a question for -- I'm not  
9 going to micromanage every word you use when you talk about  
10 taxation, but it's not accurate to say that the NRA is  
11 not -- that's two negatives. A tax exempt organization.

12 MR. CORRELL: I have not said it's a tax exempt  
13 organization. It is. It's also a not-for-profit  
14 corporation, but there are nuances that the wisdom of the  
15 Internal Revenue Service has created that are sometimes hard  
16 to navigate and one clear one, and the expert that the  
17 Attorney General put on on non-profit organizations admitted  
18 that there are differences between --

19 THE COURT: And under the N-CPL, is there a  
20 difference at this point under the N-CPL as it exists now  
21 between non -- not-for-profit corporations that are  
22 charities and those that are not?

23 MS. ROGERS: Yes, your Honor.

24 MR. CORRELL: Excuse me. If I could respond to  
25 that.



**W. LaPierre - by Plaintiff - Cross/Mr. Correll**

1 MS. ROGERS: That was me. I just want to clarify  
2 the NRA's position on this because it's us.

3 So the NRA is federally tax exempt in that the NRA  
4 does not pay taxes in the way a for-profit corporation  
5 would, but there is two distinctions being bandied about.

6 There is tax exempt, and there is charity. So the  
7 N-CPL defines a charitable corporate purpose to be the same  
8 language as 501(c)(3) in the Internal Revenue Code, and I'm  
9 reciting from memory so there could be little improvisation  
10 here, but the money has to be spent under the N-CPL for  
11 charitable purposes and under the 501(c)(3) provision of the  
12 Internal Revenue, those tax exempt funds have to be spent  
13 for charitable scientific education purposes meant to  
14 prevent cruelty to children or animals.

15 When tax lawyers talk about a non-profit, lawyers  
16 talk about charitable funds and charitable purposes, that's  
17 where that language comes from.

18 The language in the N-CPL mirrors the 501(c)(3)  
19 language in the Federal Court, and I think that was what --  
20 that's why Mr. Correll objected on legal conclusion to the  
21 term "charity," but he would not object on legal conclusion  
22 to the term "tax exempt" because the whole ecosystem of  
23 501(c) organizations from a dark money 501(c)(4) to the Red  
24 Cross to a 501(c)(3) foundation to help orphans are all 501c  
25 tax exempt.

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1 THE COURT: In terms of the N-CPL and the EPTL and  
2 the executive law, does it make a difference whether one is  
3 a charity or not?

4 MS. ROGERS: Yes, and we have briefing on this, and  
5 I would give a much shorter cliff notes version or a letter.

6 THE COURT: I remember seeing it, but I don't  
7 remember being entirely persuaded that it mattered.

8 MR. CORRELL: Your Honor, if I may.

9 THE COURT: I didn't -- actually, I -- really just  
10 did want to ask about the tax exempt thing because it seemed  
11 a little off to me. But since I had both of you speak, I  
12 should at least let the State --

13 MR. CORRELL: I think --

14 THE COURT: Well, let me --

15 MR. CORRELL: If I may --

16 MS. STERN: Mr. Correll, thank you.

17 I think that what we have here is a a huge ball of  
18 confusion. Under state law, -- I think it is.

19 The issue is that the NRA is a charity under state  
20 law. The regulations in New York define 501(c)(3) and  
21 (c)(4) as the charity, and the NRA has been registered and  
22 continues to be registered under the charitable umbrella  
23 under New York Law and the discussion of the (c)(4) and the  
24 (c)(3) is very confusing, I think.

25 MR. CORRELL: Your Honor, the problem --

**W. LaPierre - by Plaintiff - Cross/Mr. Correll**

1 MS. STERN: Excuse me. That is not the standard,  
2 and under the N-CPL, there are distinctions. The  
3 obligations of a charitable not-for-profit corporation  
4 versus a not-for-profit corporation.

5 For example, under 715 with respect to  
6 related-party transactions, certain procedures apply to the  
7 NRA because under New York Law, it is a charitable  
8 not-for-profit corporation. It's a social welfare  
9 organization.

10 MR. CORRELL: Your Honor, the genesis of this is  
11 1973 where there was a law change that people were supposed  
12 to check a box whether they were a Type A, B, C or D.  
13 That's been wiped out.

14 For whatever reason, Chad Walter advised -- well,  
15 the NRA checked the box "Type B" which was charitable and  
16 has since been known as a charitable corporation.

17 The fact is the Certificate of Incorporation says  
18 it was formed as a social organization which has an  
19 exception. So setting that aside, there is a difference  
20 between 501(c)(3) and 501(c)(4) organizations at the federal  
21 level, and we believe that my concern anyway was the  
22 Attorney General has been throwing the word "charity" around  
23 in a way that suggests, and I thought it was suggesting to  
24 the jury that this was tax deductible money going to the NRA  
25 that somehow justified the government in engaging in the

**W. LaPierre - by Plaintiff - Cross/Mr. Correll**

1 level of micromanagement that they are trying to impose on  
2 this organization.

3 During jury selection, we talked to some jurors.  
4 One of them said, I can't believe that the NRA is a  
5 non-profit, and there is this thing in the air that people  
6 are wondering how --

7 THE COURT: Well, it's both a non-profit and tax  
8 exempt.

9 MR. CORRELL: Yes.

10 THE COURT: I was meaning to ask you that question.  
11 I remember that. But in any event, let me let Ms. Rogers  
12 have the last word, and then we will take a short break.

13 MS. ROGERS: The N-CPL provision from which I am  
14 gleaning the 501(c)(3) language defining charity is  
15 N-CPL 102 subpart 3-A. I'm not aware of any provision of  
16 the N-CPL that defines 501 (c)(4) as a charity but would  
17 love the Attorney General to point it out to me, and I do  
18 think this has been briefed extensively and now is probably  
19 not the time to delve back into it, but we are happy to.

20 THE COURT: Well, I'm most concerned. Not  
21 concerned. If it has any impact on the instructions on the  
22 actual claims in this case, that's where my concern is.

23 When people toss words around, you know, "tax  
24 status" or "charity," I know ultimately the instructions I  
25 give the jury -- I wasn't anticipating having to give

**W. LaPierre - by Plaintiff - Cross/Mr. Correll**

1 different instructions on whether they determine it's a  
2 charity or not because the statutory provision that this  
3 case is brought under make no distinction.

4 MS. ROGERS: That's true. As to some other  
5 statutory provisions, EPTL is about charitable. They use  
6 the phrase "charitable assets."

7 THE COURT: You are not suggesting that the NRA is  
8 not subject to the EPTL; are you?

9 MS. ROGERS: I'm not suggesting NRA is not subject  
10 to the EPTL, but I am suggesting that there can be a  
11 distinction. There are different streams of funds that are  
12 acquired in different ways. I agree we don't want to spend  
13 a ton of court time on it, but we are happy to do a short  
14 letter.

15 THE COURT: Like I said, I'm most focused on the  
16 practical here. What I have to tell the jury makes a  
17 difference, and if the -- if the characterization matters  
18 which I have not heretofore seen it matter, then I want to  
19 make sure I'm careful about that in the instruction

20 MR. CORRELL: One case for it. It will resolve  
21 your issues. Court of Appeals, 2005, Consumer's Union drew  
22 a distinction between a charity and a 501(c)(4)  
23 organization. It's right there. I'll send it to you in a  
24 letter. Consumer Union.

25 MS. CONNELL: I would suggest that's a federal

**W. LaPierre - by Plaintiff - Cross/Mr. Correll**

1 case. This is not appropriate. This is a question of law.

2 MR. CORRELL: It's not a federal case. It's a  
3 New York Court of Appeals.

4 MS. CONNELL: If I can just finish. I'm sorry. I  
5 just don't think that having a witness explain the law is --

6 THE COURT: Well, it isn't. Anyway, I have learned  
7 a lesson about not raising issues like this during a break.  
8 At least, I got the tax exempt question answered, so thank  
9 you.

10 (Whereupon at this time there was a recess taken.)

11 THE COURT OFFICER: All rise. Jury entering.

12 (Whereupon, at this time the jury entered the  
13 courtroom.)

14 THE COURT: Okay. Have a seat, please.

15 So we are again going to take a short -- a break  
16 from Mr. LaPierre's testimony until the morning and go back  
17 and try to finish up Mr. Spray's testimony. That's the one  
18 that's on audio.

19 Before we get started, I was informed that during  
20 the playback last time there was one question and answer  
21 that I had found was hearsay, and when I marked it up,  
22 apparently this caused some confusion, so the question and  
23 answer ended up being played. My guess is you won't  
24 remember it anyway, but in case you did remember it, the  
25 question that was asked was, and it's at Page 86 of the

1 transcript. So if you at some point later on are listening  
2 to this again, the question is were you aware that the NRA  
3 was making payments to a company affiliated with Mr.  
4 Phillips's significant other, and the answer was based on  
5 what he had heard from somebody else. So the whole answer  
6 and question, the intent was for that not to be played. It  
7 was played. So if you remember it, forget it. If you don't  
8 remember it, carry on. But if you do ask during  
9 deliberations for a readback of this testimony or have it  
10 played back again, that part won't be in it.

11 Okay. So how much time do we have left in this  
12 current one?

13 MR. SHIFFMAN: 56 minutes.

14 THE COURT: And then we are rolling into the other  
15 transcript.

16 MR. SHIFFMAN: 55 minutes here and a minute and a  
17 half.

18 THE COURT: About an hour total. All right. Let's  
19 roll 'em.

20 (Video played.)

21 (Continued on the following page.)  
22  
23  
24  
25

## Proceedings

1 THE COURT: Was that supposed to happen?

2 THE TECHNICIAN: I think the system shut down.

3 THE COURT: Let's see if we can reach out to IT.

4 (Brief pause)

5 THE TECHNICIAN: The issue has been solved.

6 THE COURT: Okay.

7 (Whereupon, at this time the video continued to  
8 play.)

9 THE COURT: This next transcript is from the  
10 bankruptcy trial, is that right? So, this prior transcript  
11 was from the deposition in this case. This is a short one  
12 from the bankruptcy trial; yes?

13 MS. CONNELL: Yes, your Honor.

14 (Whereupon, at this time the video was played.)

15 THE COURT: Okay, I don't think we have time to get  
16 to a next witness. We have ten minutes left, so you get a  
17 ten-minute extra holiday.

18 Let's reconvene tomorrow morning, 9:30.

19 COURT OFFICER: All rise, jury exiting.

20 (Whereupon, at this time the jury then left the  
21 courtroom.)

22 THE COURT: Have a seat.

23 So, look, the plan for tomorrow I think should be  
24 the presumption is that we will start with Mr. LaPierre in  
25 the day and go until we finish with him with all the



## Proceedings

1 questioning. I think, obviously, if I'm looking at him and  
2 he really can't continue, I'll make a judgment call to  
3 change that; but we're not going to have any preconceived  
4 stop time.

5 My observation is that he's been pretty strong, not  
6 to suggest that disagreement with any diagnoses beyond my  
7 expertise; but I think it is important not to have this go  
8 to a third day with another chopping up of things.

9 So, let's make that presumption, unless I see  
10 something different tomorrow.

11 And then remind me, again, the witnesses after  
12 that?

13 MS. CONNELL: I believe that Lieutenant Colonel Lee  
14 is in town and needs to go?

15 MS. ROGERS: Yes. So, we had understood that the  
16 order was John Frazer and then Lieutenant Colonel Lee. He  
17 is in town.

18 MS. CONNELL: I'm happy to go in that order.  
19 That's plaintiff's preferred order. I was trying to be  
20 considerate of a witness who, I believe, lives in Hawaii.

21 THE COURT: Meaning assuming we finish  
22 Mr. LaPierre, we would then go to Mr. Lee because he's in  
23 town?

24 MS. ROGERS: We'll check with Colonel Lee and see  
25 if he has a date he has to fly out by.

1 MS. CONNELL: So, we'd like to proceed with  
2 Mr. Frazer after this.

3 THE COURT: If he's flexible.

4 MS. CONNELL: Yes.

5 THE COURT: And we have to see how long -- I admire  
6 your confidence about finishing Mr. LaPierre. So, we'll see  
7 how that goes; but we're sort of part of the way through the  
8 defense group. So, do you know in advance at this point  
9 whether the other two defendants are going to have a long  
10 period?

11 MR. WERBNER: I'm going to have a very short period  
12 of time.

13 MR. FLEMING: As would I, if any at all.

14 THE COURT: All right. See you tomorrow morning.

15 (Whereupon, at this time the trial was adjourned  
16 and continued on January 30, 2024.)

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	<b>2455:7;2461:23; 2464:11,14;2466:12; 2468:4</b>	<b>2408:20</b>	<b>2328:23;2329:19; 2331:19;2334:12,21; 2336:3;2337:9,23; 2367:10;2369:4; 2380:3,20;2389:12</b>	<b>2413:5;2422:9; 2453:1;2455:14</b>
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