

# EXHIBIT 2

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.

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JURY TRIAL  
60 Centre Street  
New York, New York  
February 13, 2024

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

APPEARANCES:

STATE OF NEW YORK  
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New York, New York 10005  
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NOAH PETERS, ESQ.

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1 THE COURT: The jury will be almost all here. One  
 2 is running a little late, and they're going to let me know.  
 3 So I want to use our time efficiently because some of that  
 4 time was going to be me reading things which is going to be  
 5 complicated, but a few preliminary things.  
 6 I have some rulings that I am going to do later on  
 7 today during our break. I don't want to use the jury time  
 8 to do that, but some of the motions that have been lingering  
 9 and some of the letters back and forth have raised some  
 10 issues, but just some preliminary things.  
 11 First of all, just to confirm which I mentioned to  
 12 you I think on Friday. We are going to have an extended  
 13 trial day on Thursday till 5:30 to accommodate completing  
 14 the closing arguments on the same day. That will in my view  
 15 permit a more reasonable division of time between the  
 16 plaintiff and the defendants which as you recall I initially  
 17 scheduled as three hours for the defendants and only one  
 18 hour for the plaintiff.  
 19 Given that the plaintiff has the burden of proof an  
 20 has to address all of the claims in the case, that was  
 21 certainly not an ideal allocation from my perspective, but I  
 22 was trying to figure out how to make it work. But assuming  
 23 the plaintiff is conscientious in preserving its time based  
 24 on the cross-examination over the next two days which they  
 25 have assured me they will be, I will keep the defendants at

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1 the three hours that I will allocate and use the extra time  
 2 that we have by extending the trial date till 5:30 to give  
 3 the AG as close to the two hours they had requested as we  
 4 can get, and it should work. I still have the defendants at  
 5 45 minutes each, but we will permit them to allocate that  
 6 differently if they agree to do so, but that's a lot of  
 7 time, you know, three hours in total, so I think that should  
 8 work. So that's my plan for Thursday assuming everything  
 9 goes right up until then.  
 10 Two issues for today. First I've seen a letter  
 11 writing back and forth about the audiotape of the purported  
 12 2019 meeting at Ackerman McQueen. I don't feel like I need  
 13 argument on that. I have the letters. I am not going to  
 14 permit that tape. I'm going to exclude that.  
 15 The NRA's proffering of an expert witness is both  
 16 too little and too late. The standard for admitting this  
 17 kind of evidence as we talked about when it first came up  
 18 where the providence of the tape can not be proven through  
 19 traditional means of interrogating the person who recorded  
 20 the conversation. The test is a stringent one as the Court  
 21 of Appeals has laid out in the People versus Ely case,  
 22 E-L-Y, 68 N.Y.2d 520.  
 23 The standard is it requires clear and convincing  
 24 proof that the tapes are genuine and that they have not been  
 25 altered. The Court did suggest that expert evidence can be

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1 part of that showing, but here whether for logistics reasons  
 2 or whatever, the NRA had an expert seemingly a couple of  
 3 weeks ago, but the decision to hold off on disclosing the  
 4 expert until there is essentially no time for any other  
 5 defendant to prepare to depose that expert or to obtain an  
 6 opposing expert, in particular, Mr. Phillips, who raised the  
 7 objection forecloses the NRA from introducing that witness.  
 8 I might have been willing to make an exception from the  
 9 traditional rules of expert disclosure for late arriving  
 10 evidence like this.  
 11 I have seen some suggestion that the evidence was  
 12 available in October of 2023, but it may be more likely  
 13 January. But the onus in this situation was clearly on the  
 14 party seeking to admit this evidence to get all of that in  
 15 front of the Court and the other parties as soon as  
 16 possible, and I'm not even sure late January when the expert  
 17 report seems to have been done would have been sufficient,  
 18 but I'm certain that February 12, yesterday with the close  
 19 of evidence tomorrow is not. The prejudice to Mr. Phillips  
 20 a purported participant in the conversation is clear. He  
 21 has no meaningful opportunity to investigate this expert  
 22 testimony and prepare for cross, and let alone, obtain his  
 23 own expert. And frankly, the testimony from Mr. Winkler  
 24 does not add much to the case for admissibility. Although  
 25 he identified the voices, he himself had doubts about the

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1 accuracy or providence of the tape and all of that is far  
 2 less substantive than the testimony that was considered not  
 3 to be as sufficient in the Ely case that was, you know, sort  
 4 of the leading case in this area.  
 5 In that case the defendant admitted several of the  
 6 statements made in the tape, and it was still found not to  
 7 be admissible. So for all these reasons, this late arriving  
 8 evidence with, you know, insufficient proof anyway but  
 9 certainly not sufficient time for the defendant who is the  
 10 most associated with at least the alleged conversation, I  
 11 think that the prejudice to that defendant is overwhelming.  
 12 So that's my ruling on that.  
 13 I received the expert slides for Mr. LaPierre. I  
 14 don't know whether there are objections to that or not. My  
 15 recollection is that way back in December or whenever we  
 16 talked about this, I indicated that, you know, a defendant  
 17 could spend some time at trial if it wanted to talking about  
 18 compensation. I think more as background than anything  
 19 else, but I would instruct the jury if you go down that path  
 20 and you decide this is how you want to spend part of the  
 21 last two days, but I would instruct the jury that there are  
 22 no claims in this case challenging Mr. LaPierre's salary  
 23 which seems to be the focus of the expert's analysis. And I  
 24 would also say that the analysis can not be -- the analysis  
 25 of the salary can not be used to argue that because he could

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1 have been paid more theoretically that that is a defense or  
 2 a justification for any statutory violations that the jury  
 3 may find to have been committed independent of the salary.  
 4 So that's where I think I came out. That's my recollection,  
 5 and that's certainly what I think makes sense now having  
 6 heard the whole case.

7 So are there any objections to the slides other  
 8 than the one I just described?

9 MS. CONNELL: Your Honor, the State objects. We  
 10 haven't had the chance to go through the slides to give you  
 11 particularized objections, but we literally just got the  
 12 slides at seven in morning. We didn't get 24 hours notice  
 13 of this witness testifying as your Honor --

14 THE COURT: Is he testifying today or tomorrow?

15 MS. CONNELL: I don't know. I asked repeatedly for  
 16 clarification. We didn't even know he was on the slate  
 17 until like 4:00 yesterday afternoon.

18 I just think -- and then -- again, we asked for  
 19 clarification. I thought we got it from the NRA last night  
 20 of what today's witness lineup was, and that's what we  
 21 prepared for so.

22 MR. CORRELL: Your Honor, I'd be happy to call him  
 23 tomorrow.

24 THE COURT: Okay. Look, I mean, if that's --  
 25 that's the way I'm going to position it with the jury. I

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1 mean, it's -- I'm really not sure I understand what the  
 2 relevance is.

3 MR. CORRELL: Your Honor, the relevance is that  
 4 Letitia James made a statement in the press release the day  
 5 the action was filed that my client or the NRA paid my  
 6 client grossly excessive salaries and then they took this to  
 7 create this false narrative of greed and corruption and  
 8 exploitation of this corporation. A man who is paid below  
 9 market is not that man, and that's the relevance.

10 THE COURT: I haven't heard a word about grossly  
 11 excessive salary in this trial.

12 MR. CORRELL: The third word out of Monica  
 13 Connell's mouth was "corruption" in her opening statement.

14 Corruption implies exploitation of an organization  
 15 for personal benefit. There was none. It's a lie, and this  
 16 evidence tends to rebut that accusation and make the truth  
 17 of that accusation less likely.

18 THE COURT: Well, we had this long conversation I  
 19 remember when we argued it, but I assume you're -- would  
 20 your position be that if you paid an executive less than he  
 21 or she is worth or that maybe they could have gotten more,  
 22 that that's somehow a justification or a defense to what  
 23 would otherwise be unlawful? You know, I don't -- I know  
 24 you don't agree that that happened, but the whole case is is  
 25 about whether other benefits that are obtained were not

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1 legitimate, were not approved. But you are not -- I don't  
 2 think you can argue that the fact that his salary may have  
 3 been lower than the -- than he possibly could have demanded  
 4 is a defense to any of that.

5 MR. CORRELL: Your Honor, know intention of doing  
 6 that.

7 One of the main claims here is that in 2013 which  
 8 is outside the statutory period, Mr. LaPierre was presented  
 9 with a letter by the president of the organization asking  
 10 him to sign a letter to create a long-term relationship with  
 11 certain compensation so that the organization could have the  
 12 benefit of his name and likeness going forward. Those  
 13 amounts were reasonable according to my expert, and the  
 14 State is claiming that this was some sort of outrageous  
 15 self-dealing contract that was designed to benefit Mr.  
 16 LaPierre.

17 THE COURT: Well, my understanding is anyway,  
 18 they're focusing on the post-employment nature of that. Not  
 19 the -- I have not heard them ever say that the -- you know,  
 20 the Board approves salary was -- violated any statute.

21 MR. CORRELL: Your Honor, they are arguing -- they  
 22 put the \$17 million figure in front of the jury and  
 23 suggesting that this \$17 million aggregate figure was  
 24 evidence of gross corruption, and we have got to debunk  
 25 that. It wasn't. If he had left, he could have

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1 theoretically made the same amount of money anywhere else,  
 2 and this was something that was presented to him as  
 3 something that was in the interest of the organization.

4 The letter states the NRA has determined that it's  
 5 in the best interest of the organization to enter into a  
 6 long-term relationship with you.

7 THE COURT: This expert is just talking about  
 8 salary while he was on the job; right?

9 MR. CORRELL: Correct. But what he is saying is  
 10 that if you look at his position, that a reasonable  
 11 compensation would be in this range or an amount would be  
 12 reasonable and that the amount that he was paid was less  
 13 than that.

14 THE COURT: All right. Well, look, like I said,  
 15 I'm going to cabin it at least and make sure they are not  
 16 confused by what they are hearing because -- and if you want  
 17 to use the dwindling sands of time that we have here to sort  
 18 of argue something that's not being challenged, I think I  
 19 have agreed that at a broad level, it's not unreasonable to  
 20 make the point that his salary was -- which is not  
 21 challenged was reasonable. That's just I guess a time  
 22 allocation question for you. So I don't -- I'm still not  
 23 going to exclude it, but I am going to make this clear to  
 24 them, you know, that it has -- that it's -- as I said,  
 25 it's -- by itself, the salary is not being challenged and

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1 that it's -- it would, in any event, not be a defense to any  
 2 of the statutory violations that are being charged here  
 3 because I'm not familiar with that it would get to what this  
 4 expert is talking about.  
 5 MR. CORRELL: Your Honor, I would have no objection  
 6 to the first instruction. I would have a strong objection  
 7 to the latter. It would amount to commenting on the  
 8 evidence and --  
 9 THE COURT: Why don't you explain to me how it's a  
 10 defense or justification to any of the actual claims?  
 11 MR. CORRELL: Not arguing that it is. What I'm  
 12 arguing is that it is a relevant fact that should be taken  
 13 into account in assessing whether this man discharged the  
 14 duties of his position in good faith and with the care an  
 15 ordinarily prudent person in a like position would exercise  
 16 under similar circumstances. It goes to did he do his job  
 17 and was he paid fairly. Did he ever ask for more? Was he  
 18 ever paid more than he should have been paid in salary? I  
 19 think it's a relevant fact that the jury can consider, and I  
 20 don't think that the Court should denigrate the evidence in  
 21 any way or to suggest to them that it is anything other than  
 22 what it is which is a datum which they can take into account  
 23 or disregard.  
 24 THE COURT: Take into account in deciding what?  
 25 MR. CORRELL: In deciding whether Mr. LaPierre

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1 acted in good faith with respect to his job. Whether he did  
 2 his job honestly. And that's the critical question in this  
 3 case is did he -- is he an honest man or was he trying to  
 4 exploit this organization for his own?  
 5 THE COURT: There is no claim that the salary is  
 6 the part that was being challenged.  
 7 Again, I don't want to keep going on and on about  
 8 it, but I think the -- you know, it may be enough to say  
 9 that, look, there is no claim in this case about the salary.  
 10 The claim is about other benefits.  
 11 MR. CORRELL: That would be perfectly fine with me,  
 12 your Honor.  
 13 MS. CONNELL: Your Honor we would just note our  
 14 objection that it's irrelevant. There is no 515 claim, but  
 15 otherwise, thank you.  
 16 THE COURT: Yeah. All right. Those were the  
 17 logistical points. I have given my law clerk my rulings on  
 18 the couple of video clips which he will be communicating.  
 19 There weren't too many objections that were being dealt  
 20 with, so he will send those to you separately.  
 21 MR. FLEMING: Your Honor, just one point. On  
 22 Friday at the end I had wanted to make a comment about the  
 23 jury charge. In particular, the Executive Law claim. I  
 24 don't know when the right opportunity would be. I don't  
 25 know if you prefer me to put in a letter. I just wasn't

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1 sure.  
 2 THE COURT: I think either during a break or, you  
 3 know, a letter would probably be best because I want to make  
 4 sure we are using our court time with the jury, but you  
 5 know, we will have breaks and the like. I'm hoping to get  
 6 the revised instructions back around to you tonight. So if  
 7 it's possible to discuss it on the record, that might be  
 8 good.  
 9 MR. FLEMING: It's a short point, and I will be  
 10 happy to do that whenever is convenient.  
 11 THE COURT: All right.  
 12 Officers is the jury ready? Do we know? We are  
 13 still waiting.  
 14 Mr. Conley.  
 15 MR. CONLEY: Yes, your Honor. I just wanted to  
 16 flag we had sent an email last evening regarding objections  
 17 that we have to a number of exhibits that have been  
 18 identified by Mr. Correll that he will use with Mr. LaPierre  
 19 today.  
 20 THE COURT: You know, I thought I had gotten to  
 21 everything. I did not. I'm going to have to --  
 22 MR. CORRELL: Your Honor, this is an easy one.  
 23 They are magazines which are self-authenticating as  
 24 periodicals under the CPLR. There can be no objection to  
 25 matters such as Time Magazine or GQ with articles featuring

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1 Mr. LaPierre as a leading lobbyist.  
 2 THE COURT: Self-authenticating maybe. But what's  
 3 the relevance and why -- are you offering it for the truth  
 4 of what they say in the articles?  
 5 MR. CORRELL: No, I'm not, your Honor. What I am  
 6 offering them for is to see that Mr. LaPierre was on the  
 7 front cover of a lot of magazine which goes to the security  
 8 issue. It goes to the success issue. It goes to his  
 9 visibility.  
 10 THE COURT: The success issue meaning what?  
 11 MR. CORRELL: Successful in getting the NRA's name  
 12 and voice heard in this country.  
 13 THE COURT: Okay. But you are not going to have  
 14 dramatic readings from the articles.  
 15 MR. CORRELL: No. I am going to have a letter from  
 16 Oprah thanking him for appearing on the show. I am going to  
 17 have letters from Crossfire, a picture of Mr. Schumer  
 18 debating with Wayne LaPierre, things that put his job, his  
 19 life in perspective.  
 20 They are criticizing his entire life. They are  
 21 claiming that he ran this place like a scam foundation for  
 22 45 years. It's just not true. It's a bald face lie, and  
 23 they know it, and they don't want the stuff to come in  
 24 because they are afraid the jury will see it and understand  
 25 who this man really is.

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1 THE COURT: What was the other objections?  
 2 MR. CONLEY: Aside from the --  
 3 THE COURT: So the Constitution and the Declaration  
 4 of Independence.  
 5 MR. CONLEY: Yes.  
 6 THE COURT: You're objecting on hearsay grounds.  
 7 MR. CONLEY: Relevance, your Honor, for those. But  
 8 the primary objection that we had actually relate to work  
 9 papers for expenses that Mr. LaPierre has paid back to the  
 10 NRA. These -- almost all of the work papers were produced  
 11 well after the close of discovery.  
 12 THE COURT: Work papers. They are his own work  
 13 papers or somebody else?  
 14 MR. CORRELL: I can address that, your Honor.  
 15 These were papers prepared at the direction of Mr. LaPierre  
 16 reflecting the documents he looked at, the numbers in the  
 17 documents and the descriptions that he gave from his  
 18 recollection refreshed by invoices and expense reports that  
 19 he used to identify invoices that he wanted to pay so that  
 20 no one could say that he had received a benefit that he  
 21 shouldn't have received.  
 22 THE COURT: Who were they -- who is -- who is the  
 23 scribe?  
 24 MR. CORRELL: The scribes were different. At one  
 25 point, it was Susan Dillon from the Brewer Firm. At one

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1 flight was business and not personal. Let's see where his  
 2 calendar says he was on that day. That kind of testing.  
 3 And her testing memoranda with a supporting compilation of  
 4 these materials of various vintages was produced to the  
 5 Attorney General in December with an offer of a supplemental  
 6 deposition of Ms. Rowling. We litigated this when Ms.  
 7 Rowling testified. The document came in. These are  
 8 supporting papers.  
 9 THE COURT: These documents didn't come in then  
 10 though.  
 11 MR. CORRELL: I believe that all of the  
 12 spreadsheets were attached.  
 13 THE COURT: Spreadsheets. But the ones that you're  
 14 trying to introduce now were not. If I have already  
 15 admitted them then --  
 16 MR. CORRELL: Correct. And this is the underlying  
 17 foundation that I said I would lay in my case in chief which  
 18 is Mr. LaPierre telling the jury exactly --  
 19 THE COURT: The testimony is one thing, but there  
 20 are some additional notes that you're proving as new  
 21 exhibits that were not produced until December?  
 22 MR. CORRELL: I'm not sure of the answer to that.  
 23 I'll have to check and --  
 24 THE COURT: Well, that's -- if I have already  
 25 admitted something, you don't haven't to admit it again.

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1 point it was Lisa Correll a paralegal in my firm, and there  
 2 may have been -- I think at one point Vanessa Shahidi who  
 3 works at the NRA may have helped put a spreadsheet together  
 4 just to try to track the information that he was producing.  
 5 This was an ongoing process in which Mr. LaPierre was making  
 6 a good faith effort to go back all the way to 2000 to  
 7 identify anything that he -- anyone could say he received  
 8 that he shouldn't have received.  
 9 THE COURT: When were these prepared?  
 10 MR. CORRELL: Pardon me.  
 11 THE COURT: When were these prepared?  
 12 MR. CORRELL: Over a course of years, I believe. I  
 13 think they started -- I don't have them in phone of me, but  
 14 I believe the first one may have been before I was involved  
 15 in the case.  
 16 MS. ROGERS: Your Honor, I can speak to that.  
 17 So these were prepared over the course of years  
 18 as -- Mr. Correll says and most were produced to the  
 19 Attorney General in 2022. So there is --  
 20 THE COURT: Most were?  
 21 MS. ROGERS: So the late production that they are  
 22 talking about is this is we have discussed this before. So  
 23 Sonya Rowling in November gathered up all of these  
 24 spreadsheets, some of which were a year old and did auditing  
 25 and forensic testing to make sure, you know, we said this

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1 But if these are documents that were prepared a long time  
 2 ago, sounds like some of them might have even been prepared  
 3 before Mr. LaPierre was deposed. But in any event, I don't  
 4 really understand what the rationale would be for not  
 5 producing them sooner.  
 6 MR. CORRELL: In some cases, Mr. LaPierre did not  
 7 have control over whether they were produced or not.  
 8 THE COURT: Yeah. I was wondering about the  
 9 privilege issue around this.  
 10 Look, I am going to have to look at these in  
 11 context, and I don't want to spend what will be the next  
 12 15 minutes debating it while the jury waits. So I'm going  
 13 to defer ruling on those until -- I'll just have to deal  
 14 with it when it comes up.  
 15 MS. CONNELL: I just want to note that those items  
 16 that were admitted through Ms. Rowling, you admitted them  
 17 for a very, very limited purpose because it was hearsay on  
 18 top of hearsay on top of hearsay.  
 19 You specifically said this is to show that the NRA  
 20 engaged in some process in December.  
 21 THE COURT: That's a good reminder. Look, I'm  
 22 going to -- I'm a little skeptical about this coming in, but  
 23 I need to look at in context.  
 24 So jury is ready? Let's get -- what's the first  
 25 thing up?

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1 MR. CORRELL: Mr. LaPierre.  
 2 THE COURT: Okay. Let's get the jury.  
 3 I will just make an evidentiary call when you  
 4 proffer the exhibits, and I will just look at them real  
 5 time. I understand the point they were not produced until  
 6 late, perhaps because of some back and forth with the NRA.  
 7 I don't know.  
 8 THE COURT OFFICER: All rise. Jury entering.  
 9 (Whereupon, at this time the jury entered the  
 10 courtroom.)  
 11 THE COURT: Good morning, everyone. Please have a  
 12 seat. I wanted you to know that I'm very impressed but not  
 13 surprised that you all braved the weather to get here  
 14 together today. I appreciate it.  
 15 One small scheduling thing for this week. As you  
 16 know, the plan is to have closing arguments on Thursday.  
 17 And given the number of people who have to do them and my  
 18 desire to have them all on one day so you can hear them all  
 19 consecutively, I have gotten permission to stay till 5:30 on  
 20 Thursday. So just an early heads up. We are going to have  
 21 sort of an extra half hour to 40 minutes on Thursday night  
 22 so we can complete the closing arguments and be ready for  
 23 Friday will just be instructions and then your  
 24 deliberations. Okay. Rather than breaking them up.  
 25 All right. Next witness for the Defense.

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1 it difficult for me to see. And when the eyes work so hard to  
 2 see, the brain has a hard time anticipating and can actually end  
 3 up presenting as dementia.  
 4 (Continued on the following page.)  
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1 MR. CORRELL: Mr. LaPierre calls Mr. LaPierre.  
 2 W A Y N E L A P I E R R E, a witness called on  
 3 behalf of the Defendant, after having been first duly sworn,  
 4 took the witness stand and testified as follows:  
 5 THE CLERK: State your name.  
 6 THE WITNESS: Wayne LaPierre.  
 7 THE CLERK: Thank you. You may be seated.  
 8 THE COURT: Good morning.  
 9 THE WITNESS: Good morning.  
 10 DIRECT EXAMINATION  
 11 BY MR. CORRELL:  
 12 Q Wayne, how are you feeling today?  
 13 A I'm doing okay.  
 14 Q Are you -- have you been taking any medication that  
 15 might affect your testimony today?  
 16 A I'm not taking it today. I have been taking  
 17 medication.  
 18 Q And what kind of medication?  
 19 A Amoxicillin, Cipro, Artemisia, Minocycline, a whole  
 20 bunch of drugs for late-stage Lyme Disease.  
 21 Q And what effect do those drugs have on you when you're  
 22 talking them?  
 23 A They make pain -- it's like there is an internal war  
 24 going on within your body, and it's also going to the  
 25 neurological receptors between my eyes and my brain which makes

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1 Q And does it have any effect on your eyes and your  
 2 muscle control?  
 3 A It does. It looks like I'm squinting to see.  
 4 Q Is it sometimes hard to keep your eyes open?  
 5 A Yes.  
 6 Q So, we're going to try and go as long as we can this  
 7 morning, and the Court has accommodated you by allowing us to  
 8 start first thing. We're going to try and go as long as we can;  
 9 and then when we have to stop, we'll continue tomorrow morning,  
 10 first thing.  
 11 A Thank you.  
 12 Q Is there a time of day in which you feel better with  
 13 this condition?  
 14 A Yes, in the mornings.  
 15 Q So, let's start at the beginning. Where were you born?  
 16 A I was born in Schenectady, New York.  
 17 Q And how long did you live in Schenectady?  
 18 A For approximately, five years.  
 19 Q And where did you go after Schenectady?  
 20 A My parents moved to Roanoke, Virginia.  
 21 Q Had your father been employed in Schenectady?  
 22 A Yes, he had, by the General Electric Company.  
 23 Q And had your mother been employed in Schenectady?  
 24 A Yes, by General Electric.  
 25 Q And had you been employed in Schenectady?

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W. LaPierre - by Defendant - Direct/Mr. Correll Page 4053

1  
2 A Not at five years old.  
3 Q When you got to Roanoke, what did you do there?  
4 A I went to elementary school, junior high school and  
5 high school.  
6 Q And did you have any work experiences there?  
7 A I worked -- I don't think it was paid -- handing out  
8 campaign leaflets before I went to -- in high school.  
9 Q And did you go on to college?  
10 A I did.  
11 Q Where did you go?  
12 A Sienna College in Loudonville, New York.  
13 Q Is there any reason you picked that college?  
14 A I know it through my dad, and I was up there visiting  
15 it and I liked it and I went there.  
16 Q Had he gone there?  
17 A Yes, he had.  
18 Q When had that college be established?  
19 A I think it was established in the mid thirties.  
20 Q Would 1937 ring a bell?  
21 A I think that would be about right.  
22 Q When did your father attend?  
23 A He attended before World War II. He went off to the  
24 war, and then he came back and finished up at college.  
25 Q So, he would have been one of the first students to

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1 A Yes.  
2 Q And were they proud to have their son working in the  
3 same company?  
4 A Yes, I believe so.  
5 Q Tell us about unloading banana boats, what kind of work  
6 was that?  
7 A Well, the port of Albany was a nonunion port at that  
8 point. So you go down and stand in line and if they -- if they  
9 saw you out there, a whole bunch of people and they'd say you,  
10 you, you; and I ended up getting picked and they got to know me,  
11 so I got picked quite often.  
12 Q And what time did you have to go up in the morning to  
13 get in the line?  
14 A About 6:45.  
15 Q And how long were the work days?  
16 A They were till five o'clock.  
17 Q Was it cushy work?  
18 A No. You'd be down in the hull of the ship lifting up  
19 pallets and lifting up things to be lifted out of the ship.  
20 Q What kinds of people were you working with on the ship?  
21 A Just average working people that wanted the job like  
22 me.  
23 Q You said you sold shoes. Did you go door to door?  
24 A No. I worked in a Florsheim store in Colony Center.  
25 Q Did you do anything else in college, any other work

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1 attend; correct?  
2 A One of the earlier years, yes.  
3 Q And it was a Franciscan college; correct?  
4 A Yes, it was.  
5 Q And the Franciscans are an order of the Catholic  
6 church, correct?  
7 A Yes.  
8 Q Was your father Catholic?  
9 A Yes.  
10 Q Was your mother Catholic?  
11 A Yes.  
12 Q Are you Catholic?  
13 A Yes.  
14 Q Are you a practicing Catholic?  
15 A Yes.  
16 Q Did you have any work experiences when you were in  
17 college?  
18 A Yes, I did. I unloaded banana boats down at the port  
19 of Albany. I sold shoes for a while.  
20 In the summers, I worked in the factory, General  
21 Electric.  
22 Q Were you proud to work in the company that your father  
23 worked for?  
24 A Yes.  
25 Q And your mother worked for?

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1 experiences?  
2 A I -- as I said, I worked in the summers in the fact  
3 /TOEUR at General Electric.  
4 Q Did you have any political experience as you were  
5 working -- while you were at Sienna?  
6 A Yes, I did. I served as an internship for a year in  
7 the offices of two state senators in the New York State  
8 legislature.  
9 Q What were their names?  
10 A Senator Stewart and Senator Gallagher.  
11 Q What districts did they represent?  
12 A They represented Harlem and the Bronx.  
13 Q Did you have any exposure to constitutional issues  
14 while you were there?  
15 A Yes, I did. They were both heavily involved in the  
16 civil rights movement. A lot of the civil rights leaders use to  
17 come into the office to say hello, Julian Bond. That's how I  
18 met Roy Innes with the Congress of Racial Quality and we became  
19 lifelong friends.  
20 Q Anyone else that you ran into or that came by when you  
21 were working as an intern?  
22 A Vernon Jordan came by to say hello to the state  
23 senators, and some of the boxers, too. Roy Innes was one of the  
24 top amateur boxes in the country, also.  
25 Q What kind of work did you do as an intern?



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1 A Whatever they gave me to do, research, legislative  
2 projects, answer mail, answer telephones. It was basically  
3 whatever they were looking in turn to do.  
4 Q What were you studying at Sienna College at the time?  
5 A Political science and education.  
6 Q And had you given any thought at that time what you  
7 wanted to do when you grew up?  
8 A I thought at that time I wanted to be a college  
9 professor is what I was thinking.  
10 Q And did you graduate from Sienna?  
11 A Yes.  
12 Q How did you do academically? Did you make the Dean's  
13 list?  
14 A Yes, I did.  
15 Q Did you pursue any education after graduating from  
16 Sienna College?  
17 A Yes, I did. I went to Boston College for a Master's  
18 degree.  
19 Q And that is a Catholic college; correct?  
20 A Yes, it is a Jesuit college.  
21 Q And that's another order of the Catholic church;  
22 correct?  
23 A Yes.  
24 Q What kind of course work did you do at Boston College?  
25 A Urban affairs, political science, international

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1 affairs, the whole spectrum.  
2 Q Was there a formal title for what you did, a  
3 concentration or a major, was it government or politics?  
4 A It was government, government politics.  
5 Q And how long did you spend there working on a Master's?  
6 A I was there for a year doing my Master's degree.  
7 Q Did you work during that time?  
8 A I did some phone banks.  
9 Q For whom?  
10 A The police.  
11 Q Is that an association of police officers?  
12 A It is one of the police associations. It was raising  
13 money for the officers.  
14 Q And what did you do after -- did you get your Master's?  
15 A I did.  
16 Q And what did you do after that?  
17 A I went back down -- well, before I went to Boston  
18 College, when I graduated from college, I went down to Roanoke  
19 and I worked on a democratic congressional campaign in the 6th  
20 District of Virginia for a candidate named Willis Anderson --  
21 Q Can I stop you there and just ask what you did on that  
22 campaign?  
23 A I was a campaign coordinator working on everything from  
24 media to covering the district with mail, and direct mail, and  
25 leaflets and working on 1.

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1 Q And did the candidate win?  
2 A No, he lost.  
3 Q What was your next experience in politics?  
4 A Well, the campaign manager was a country store owner,  
5 and he was named Vic Thomas and he was the -- his store was  
6 almost like a social work agency. He helped so many people and  
7 I kept saying to him, Vic, you ought to be the candidate. I'm,  
8 like, you're better than anybody I've ever seen with people and  
9 he's like I don't know. I'm like, you really ought to run; and  
10 we went back and forth, and he ran for the state legislature and  
11 I worked with him on that campaign.  
12 Q How did you help him on that campaign?  
13 A I basically did the advertising, the speech writing,  
14 the brochures. I walked the entire city of Roanoke with him and  
15 along with his wife and his kids going door to door, and he won  
16 that race.  
17 Q Did you know the city of Roanoke from having grown up  
18 there?  
19 A I did.  
20 Q Did you focus your attention on any particular part of  
21 the city or did you help all over the city?  
22 A Well, we were all over the city, but we particularly  
23 concentrated on the heavily democratic areas, make sure we got  
24 on the phone.  
25 Q What was the result of that election?

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1 A It was a multimember district. There were four  
2 candidates, and Vic ended up surprising every one because they'd  
3 say was going to finish last, and he led the ticket and he won.  
4 Q Did you continue to work with him after he was elected?  
5 A I did.  
6 Q What kind of work did you do for him?  
7 A I worked in the legislature doing legislative  
8 assistant, as his legislative aide.  
9 Q And this is the Virginia state legislature; correct?  
10 A Yes, that's correct.  
11 Q How long did you stay with him?  
12 A Well, I thought I was -- I still what was intending to  
13 be a college professor, so I was going to go to Emory. I went  
14 down to Atlanta. I decided to go back to Boston College; but I  
15 stayed there for a year, and I worked a number of odd jobs.  
16 Q And did do you the course work for a Ph.D.?  
17 A I did. I went back to Boston College, did the course  
18 work for a Ph.D. while I was doing also political consulting  
19 work.  
20 Q And did you write a dissertation?  
21 A I did not. I did not finish a dissertation.  
22 Q Why not?  
23 A I was doing political consulting. I was on the  
24 democratic national committees, national consulting list. I was  
25 in Washington. A candidate was interviewing me as to whether he

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1 wanted to hire me or not, and I had known the NRA people through  
 2 the legislature with Vic Thomas, the State delegate who was an  
 3 NRA member.  
 4 And so I walked across the street from the DNC to say  
 5 hello to the folks at the NRA I knew, and they were looking for  
 6 a democrat to come work for them and they offered me a job.  
 7 Q And did you take it?  
 8 A I did. I thought about it for awhile because I didn't  
 9 know about lobbying. I mean, my love was the legislative  
 10 process, politics and all that; but I thought about it and I  
 11 took it.  
 12 Q What about the candidate that was interviewing you to  
 13 see whether he wanted you as a consultant for his campaign, did  
 14 you like that candidate?  
 15 A Yes, but I ended up -- I ended up going to work for the  
 16 NRA. He ended up going to winning the campaign and served for  
 17 Congress for a number of years, so I guess he did fine without  
 18 me.  
 19 Q What was the first position that you occupied at the  
 20 NRA, the title?  
 21 A It was a state liaison. I covered ten states in the  
 22 northeast part of the United States.  
 23 Q And who had held that job before you, do you recall?  
 24 I know it was a long time ago.  
 25 A I'm not sure because it was the only year before they

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1 formed the Institute for Legislative Action, so I think I got in  
 2 on the ground floor.  
 3 Q And so was your position in the Institute for  
 4 Legislative Action as opposed to sort of the main NRA?  
 5 A Yes.  
 6 Q And could you explain to the jury the difference  
 7 between the main NRA and the Institute for Legislative Action?  
 8 A Well, the Institute for Legislative Action is part of  
 9 the NRA that was set up to do the political legislative  
 10 activities of the NRA.  
 11 The main part of the NRA does all the programs. It  
 12 does the magazines. It has the advancement office. It has the  
 13 whole general operations division which does the safety  
 14 training, education, instructors, hunter education, all of those  
 15 type of programs.  
 16 Q Where does the lobbying activity occur? Does it occur  
 17 in the main NRA or ILA?  
 18 A It occurs in ILA.  
 19 Q And so your position was director of -- would you tell  
 20 me again the title, please?  
 21 A No, not at first. It was state liaison. I was the  
 22 person that was delegated to work with the members in those ten  
 23 states, to also work with legislatures, legislatures on the  
 24 interaction between the members and the legislators and work on  
 25 the legislation and the politics.

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1 Q Did you work hard in that position?  
 2 A I did. I really enjoyed it because I got to work with  
 3 the members, which are the life and blood of that organization.  
 4 Without the members, it doesn't exist.  
 5 Q And was your performance recognized in that position?  
 6 Were you -- did you receive any performance reviews?  
 7 A I think I did and I -- yes, I believe I did.  
 8 Q Did you get any -- well, let me ask you this way.  
 9 Did you feel like you performed the duties of that  
 10 position?  
 11 A Yes, I did.  
 12 Q And how long were you in that position?  
 13 A One year.  
 14 Q And then what happened?  
 15 A I was promoted to director of state local affairs,  
 16 which was all 50 states in the legislatures.  
 17 Q And what were your duties in that position?  
 18 A To supervise the legislative and political activities  
 19 in all fifty of the states for the NRA working with the other  
 20 folks in the office that were doing what I used to do, which was  
 21 handling part of the country. And then also worked with the  
 22 membership in those 50 states, which as I said is the life,  
 23 blood of the organization.  
 24 Q And who did you report to?  
 25 A I reported to the director of the Institute for

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1 Legislative Action.  
 2 Q Who was that at the time?  
 3 A At that time, it was Neal Knox.  
 4 Q And did you have any direct line of reporting to anyone  
 5 else in the organization?  
 6 A Not a direct line, but I was also kept in very close  
 7 contact with Harlon Carter who was the EVP of the organization  
 8 and was very involved in overseeing the entire organization.  
 9 Q And what do the initials EVP stand for?  
 10 A Executive vice president.  
 11 Q How long had he been the executive vice president?  
 12 A Oh, I don't know. Going back some time in the I think  
 13 mid 70s. He was there when I arrived.  
 14 Q And what year was it when you arrived?  
 15 A January 1st, '78.  
 16 Q How long did you stay in that position?  
 17 A I stayed in that position a year.  
 18 Q Then what happened?  
 19 A I was appointed director of government affairs for the  
 20 NRA.  
 21 Q Is that a job you wanted?  
 22 A No, not really. I grew up doing the state  
 23 legislatures, as I said, the politics in the state legislatures.  
 24 I really enjoyed the states and I wanted to stay working the  
 25 states as opposed to working at the federal level. But, they

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1 told me if you want a job tomorrow, it is in the federal  
 2 affairs, not state and local, so I took it.  
 3 Q What were your duties in the new job?  
 4 A It was to oversee the NRA legislative and political  
 5 operation on Capital Hill and with federal regulatory agencies  
 6 and all of that.  
 7 Q And what year was that?  
 8 A 1980.  
 9 Q 1980. Did you have any success in that position?  
 10 A I think so. I mean, I worked hard. I always thought I  
 11 just let my performance speak for itself, and I guess the two  
 12 biggest successes we had was I worked with Senator Hatch where  
 13 there was an issue whether the 2nd Amendment of the constitution  
 14 was an individual right or whether it applied only the  
 15 government.  
 16 So, I worked with Senator Hatch and Senator DeConcini  
 17 who was the minority democrat on the committee in charge to have  
 18 the subcommittee on constitution investigate an issue -- they,  
 19 ultimately, issued a report concluding that it was an individual  
 20 right, which helped lay the beginning of a scholarship for  
 21 the 2nd Amendment being an individual right, not a government  
 22 right.  
 23 Q Did you begin to receive any recognition for your work  
 24 on behalf of the NRA in terms of publicity or attention from the  
 25 press?

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1 A I did. It was particularly involved with a bill called  
 2 McClure-Volkmer bill, which it was a complete rewrite of the  
 3 1968 Gun Control Act, and I had worked with Senator Birch Bayh,  
 4 a democrat of the Judiciary Committee.  
 5 We held hearings because the bill was too broad.  
 6 Everything was a federal felony. If you made the most minor  
 7 mistake, it was federal felony. There were no misdemeanors.  
 8 The bill needed to be rewritten to be fair to normal people that  
 9 made an honest mistake.  
 10 I worked with the Treasury and Justice Department to  
 11 get the law enforcement amendments in the bill; and we,  
 12 ultimately, passed that bill and I received recognition for my  
 13 work on that bill in the media and the press.  
 14 Q Would you turn your attention, please, to Tab 60 in  
 15 your binder Volume 1 of 2, please.  
 16 This document has been marked for identification, I  
 17 believe, as -- do we have an exhibit number? WLX 226.  
 18 Do you recognize that document?  
 19 A I do.  
 20 MR. CORRELL: Your Honor, this is a copy of a --  
 21 the cover sheet of a magazine, which is periodical  
 22 self-authenticating.  
 23 I move its admission into evidence.  
 24 THE COURT: I mean, it is admitted just for the  
 25 fact that the article was written. I don't think you're

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1 admitting any of the text for any truth of the matter  
 2 asserted, just the fact that he was mentioned in an  
 3 article.  
 4 (Whereupon, at this time Exhibit WLX 226 was  
 5 admitted and received into evidence.)  
 6 MR. CORRELL: Well, that fact and the fact that  
 7 we're looking at the back of his head on the cover and I'll  
 8 ask him to identify.  
 9 Q Do you recognize the person who appears on the cover of  
 10 this magazine?  
 11 A I do. That's me with a bad haircut.  
 12 Q What are you doing in this picture or pretending to do  
 13 in this picture?  
 14 A They just wanted a picture of me walking up the stairs  
 15 of the capital, and it was staged.  
 16 MR. CORRELL: Can we put this up for the jury,  
 17 please.  
 18 MR. CONLEY: Your Honor, we object on relevance and  
 19 hearsay.  
 20 THE COURT: Overruled.  
 21 Q I hate to do this to you, Wayne. Everyone can see the  
 22 bad haircut now.  
 23 Would you direct your attention to the words in the  
 24 upper right-hand side. Do you see that?  
 25 A Yes.

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1 Q "Taking on Congress the How-to's of Lobbying?"  
 2 A Yes.  
 3 Q Is that the article that you were featured in?  
 4 A Yes.  
 5 Q And was in else featured in the article?  
 6 A Yes. I was surprised I was even in the article. I  
 7 didn't know how I even got there because the other folks were,  
 8 like, legends in the lobby business. Tommy Boggs, Evelyn Dubrow  
 9 who represented the unions, and one of the top tax lobbyists in  
 10 the country.  
 11 Q If you could turn your exhibit to page 3. You see a  
 12 strip of photographs.  
 13 Can you identify the person in that photograph? Just  
 14 page 3 at the bottom.  
 15 So, 1, 2, 3 -- there you are. You're on the right page  
 16 now, left-hand side. It's a film strip excerpt?  
 17 A On the film strip, yeah, yes, that's a picture of me.  
 18 Q Okay, and the article here is listed as I believe in --  
 19 I'm looking for it. The Features, page 23, it says "Thumping in  
 20 the special interests of John Jenkins talks to four top  
 21 lobbyists to find ut the tricks of taking on Congress,"  
 22 correct?  
 23 MR. CONLEY: Objection, your Honor, to reading  
 24 hearsay into the record.  
 25 THE COURT: It is not being offered for the truth

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1 of anything. It is just the fact that there's an article  
 2 that he's in about this topic.  
 3 So, overruled.  
 4 Q Then, lastly, I would just ask you to flip over to page  
 5 23.  
 6 A Yes.  
 7 Q Tell me -- I guess flip over, that's the beginning of  
 8 the article, "The Law Choreographers Tips from the Top."  
 9 And then flip over to page 28, there's another little  
 10 photograph.  
 11 Can you identify the person in that photograph?  
 12 A That's my photograph on that page.  
 13 Q And what follows underneath that is a little discussion  
 14 about -- it is an article about you; correct?  
 15 A Yes, and the legislative and lobbying work.  
 16 Q And did you sit for an interview for that article?  
 17 A Yes.  
 18 Q Have you ever sat for an interview before?  
 19 A Pretty early on. I had done interviews when I was a  
 20 state and local lobbyist, but I never sat for an interview like  
 21 this.  
 22 Q So, last request is to flip to page 30, and there are  
 23 other photographs there. Can you tell me who the person is in  
 24 those photographs?  
 25 A Yes, those are -- those are photographs of me.

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1 Mr. Cox about whether he knew about this work that was done  
 2 by the NRA. He said he didn't.  
 3 This has Mr. LaPierre's handwritten notes on it,  
 4 and he has personal knowledge that he worked on this and was  
 5 actively involved in this. This is a public document that  
 6 is directly relevant to his qualifications to serve as EVP  
 7 and to the success of his work in this position.  
 8 THE COURT: There's been no challenge to the -- his  
 9 qualifications I don't believe.  
 10 MR. CORRELL: I'll move very quickly through this,  
 11 your Honor.  
 12 THE COURT: Sustained. The case is not about this  
 13 or his qualifications.  
 14 Q Mr. LaPierre, did you work with the Senate committee on  
 15 this project?  
 16 A Yes.  
 17 Q And was any -- was there any benefit to the NRA that  
 18 was derived from your work on this project?  
 19 A Well, I believe we were doing our -- one of our core  
 20 missions besides the programs and the education. It was  
 21 advocacy for the right of individual citizens to be able to own  
 22 a firearm under the constitution.  
 23 Q Did you receive any recognition for your work on this  
 24 project?  
 25 A Not particularly. I think NRA was very, very proud of

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1 Q So, I wanted to end on a better photograph. All right,  
 2 so let's close up --  
 3 THE COURT: I think it's generally true that there  
 4 are no good photographs in the 1970s of anyone.  
 5 MR. CORRELL: That is correct, your Honor. We'll  
 6 stipulate to that. You wouldn't want to see mine.  
 7 Q All right, if you could flip to the second tab, please.  
 8 Do you recognize this document?  
 9 A 61.  
 10 Q Tab 61, yes.  
 11 A Yes.  
 12 MR. CORRELL: And do we have an exhibit number for  
 13 that? 227, WLX 227.  
 14 Q Do you recognize this document?  
 15 A Yes, I do.  
 16 Q What is it?  
 17 A That is the report of the subcommittee on Constitution  
 18 of the United States Senate that I was talking about exploring  
 19 whether the 2nd Amendment was an individual right of citizens or  
 20 whether it was only the government's right.  
 21 MR. CORRELL: Your Honor, I move this into evidence  
 22 as a public record.  
 23 MR. CONLEY: Object on relevance, your Honor.  
 24 THE COURT: Sustained.  
 25 MR. CORRELL: Your Honor, there was testimony with

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1 it, and I think it had an impact in terms of helping to lay the  
 2 scholarship which would later be used in court cases on this  
 3 issue.  
 4 Q Did the NRA firearms civil rights legal defense fund,  
 5 ultimately, reprint this report?  
 6 A Yes.  
 7 Q And why?  
 8 A Because it was a meaningful scholarship in terms of  
 9 laying the groundwork for, as I said, for research and -- and  
 10 could be cited in further court cases about the meaning of the  
 11 2nd Amendment.  
 12 Q Would you turn your attention to the document behind  
 13 Tab 62, please.  
 14 MR. CORRELL: Do you have an exhibit number,  
 15 please? 227 was marked for identification I believe, so  
 16 we'll go to the next, 228:  
 17 Q Do you recognize this document?  
 18 A I do.  
 19 Q What is it?  
 20 A It is a reprint of part of the Senate's subcommittee on  
 21 constitution report. It was done by the NRA firearms civil  
 22 rights legal defense fund.  
 23 Q Was this prepared at your direction?  
 24 A It wasn't prepared at my direction.  
 25 Q Who directed this be prepared?

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1 A I'm not sure.

2 Q Do you recall seeing this when it came out in 1982?

3 A Yes.

4 Q And do you remember using in connection with your

5 efforts to advance the mission of the NRA?

6 A Yes, I think the NRA used it as an advancement of the

7 2nd Amendment meaning to be an individual right. At that time,

8 a lot of the prevailing belief was the 2nd Amendment applied

9 only to the government, not individuals and there were supreme

10 court justices saying that. And we didn't believe that and this

11 was along with a lot of other things, part of the beginning of

12 really laying the legal scholarship for further Supreme -- later

13 Supreme Court cases.

14 MR. CORRELL: Your Honor, move this into evidence.

15 MR. CONLEY: Object on relevance, your Honor.

16 THE COURT: Sustained.

17 Q Did there come a time when you were involved in trying

18 to increase support for the U.S. Shooting team?

19 A Yes. I always tried to increase support for the U.S.

20 Olympic Shooting team.

21 Q Why was that?

22 A One, we were proud of them. They were representing the

23 United States of America. They were great young -- great group

24 of young men and women that needed support.

25 NRA at that time was actually the governing body for

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1 the U.S. Olympic Shooting team and, and I think it, it -- I

2 mean, it reflected well on America. It reflected positively on

3 the NRA, the fact the NRA was supporting it.

4 (Continued on next page)

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W. LaPierre - by Defendant - Direct/Mr. Correll Page 4075

1 Q And was there a -- back in those days, can -- you had

2 mentioned magazines before. Did the NRA have magazines that it

3 published back then?

4 A Yes, we did. We published the American Hunter, the

5 American Rifleman, and those were the two big ones back at that

6 time.

7 Q And who was president in 1984?

8 A President Reagan.

9 Q And did you hatch a scheme to try to get him to pose

10 for the cover of Hunter Magazine back then?

11 A We did. We wanted to do a magazine cover with

12 President Reagan, and there was a -- there was a constant battle

13 going on within the Reagan administration between certain people

14 that didn't -- President Reagan was in support of the NRA, but

15 there were certain people that didn't support the NRA or the

16 administration, and they didn't want a picture taken with

17 President Reagan that could be used on the cover. And the U.S.

18 Olympic Shooting Team happened to be coming to town, and there

19 were some folks in the Reagan administration that Faith

20 Whittlesey in particular who said, well, they can't deny a

21 president a picture with the U.S. Olympic Shooting Team, and if

22 that picture is taken, NRA could get a copy of that and you

23 could put that picture on the magazine which is what we did.

24 MR. CORRELL: Your Honor, move admission into

25 evidence of the document behind Tab 63 which is Exhibit 229.

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1 MR. CONLEY: Object on relevance, your Honor.

2 THE COURT: Sustained.

3 MR. CORRELL: Your Honor, this is relevant to show

4 Mr. LaPierre's growing success in dealing with difficult

5 issues -- political issues on Capitol Hill. I think it's

6 directly relevant to the question of whether he has

7 discharged the duties of his position in good faith and with

8 appropriate care over the length of his 44-year career.

9 I think there is no prejudicial effect to the

10 Government from having this document put before the jury. I

11 think they are entitled to see it.

12 THE COURT: Sustained.

13 Q Would you turn to the third sheet of paper in this

14 document and tell me if you recognize the person in that

15 photograph.

16 A I'm sorry. You lost me. Where are you?

17 Q Wally Schirra.

18 A Yes. He was one of the astronauts that was in featured

19 in On The NRA campaign.

20 Q And what was he On The NRA campaign?

21 A The On The NRA campaign was a campaign that was devised

22 by I believe it was when Harlon Carter was still EVP of the NRA

23 to show that the NRA was normal people of every, as I've said

24 before, on every city block in America, of every race, of every

25 income level, of every occupation, and we -- and it covered the

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1 -- covered the whole spectrum of America.  
 2 Q Who came up with that idea?  
 3 A Ackerman McQueen which was the ad agency at that time  
 4 that Harlon Carter hired.  
 5 Q How long had Ackerman McQueen been the advertising  
 6 agency for the NRA?  
 7 A I believe Harlon hired him sometime in the  
 8 mid-seventies.  
 9 MR. CORRELL: Your Honor, move the admission of  
 10 this photograph as evidence of work done by Ackerman McQueen  
 11 who was a central character in this case.  
 12 MR. CONLEY: Object on relevance, your Honor.  
 13 THE COURT: Worked on in 1982?  
 14 MR. CORRELL: Your Honor, they continued to work  
 15 for the organization long after that. And one of the key  
 16 allegations here is that Ackerman McQueen was used to  
 17 conceal expenses.  
 18 THE COURT: I still don't see the relevance of a  
 19 1982 photograph. Sustained.  
 20 Q Mr. LaPierre, did there come a time when you were  
 21 recognized in your Roanoke Times and World News for your efforts  
 22 as a lobbyist on behalf of the NRA?  
 23 A Yes. They wrote an article on me about a local kid  
 24 that was doing that.  
 25 Q Would it be fair -- well, it was June 1, 1986 when that

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1 article appeared?  
 2 A That's correct.  
 3 Q And at that point in your career, had you ever had a  
 4 death threat against you?  
 5 A I don't know that at that time I had had a death  
 6 threat. My profile was increasing, but I don't know that I had  
 7 had a death threat at that time.  
 8 Q And at that time did you travel by commercial aircraft  
 9 when you traveled?  
 10 A Yes.  
 11 Q And did you have a security detail back then?  
 12 A No.  
 13 Q And why was that? Was the issue that you were working  
 14 on as controversial then as it is now?  
 15 A It was not controversial.  
 16 Q Was there bipartisan support for appropriate  
 17 legislation addressing gun policy issues back then?  
 18 A Yes.  
 19 Q And did you work with people on both sides of the  
 20 aisle?  
 21 A Yes.  
 22 Q Ever work with Teddy Kennedy?  
 23 A I met him several times yes.  
 24 Q Ever work with Bob Dole?  
 25 MR. CONLEY: Objection, your Honor. Leading.

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1 Relevance.  
 2 THE COURT: Overruled. I'll let you continue doing  
 3 this background, but I assume we are going to segway into  
 4 our case.  
 5 MR. CORRELL: Yes, your Honor, we would move faster  
 6 if I could just do my show and tell, but I'll try to do it  
 7 through Mr. LaPierre himself. The jury can see it in  
 8 photographic form, and we could accelerate by a factor of  
 9 ten.  
 10 A My main interaction with Senator Kennedy is when I was  
 11 in Senator Dole's office one day, and we were trying to get  
 12 records put into the National Check Bill which is what they do a  
 13 check before you buy a firearm, and Senator Kennedy walks into  
 14 Senator Dole's office and says, I can't support this.  
 15 Q Did he give a reason for why he couldn't support it?  
 16 A Yes because of the HIPAA laws and the fact that mental  
 17 health records, he believed should be private and not put into  
 18 the system.  
 19 Q So turning to Tab 64 which is WLX 230. Do you  
 20 recognize that document?  
 21 A I'm sorry. 64.  
 22 Q Yes. Behind Tab 64. It says "Virginia" at the top.  
 23 A Yes. That, as I say, was an article from the city  
 24 where I grew up, Roanoke, which was talking about me, a local  
 25 kid that was doing this job.

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1 Q Were your mom and dad still alive at that point?  
 2 A Yes, they were.  
 3 Q Did they read the article?  
 4 A Yes, they did.  
 5 Q Were they proud of their son?  
 6 A I think so.  
 7 MR. CORRELL: Your Honor, if I could just move this  
 8 into evidence.  
 9 MR. CONLEY: Object on relevance and hearsay.  
 10 MR. CORRELL: Your Honor, it shows the role this  
 11 man was playing early on which later grew into a much  
 12 broader role with him wearing many, many hats.  
 13 THE COURT: I don't think that there are any claims  
 14 disputing that.  
 15 MR. CORRELL: Your Honor, the claim is that he  
 16 failed to perform his duty, and they have also raised  
 17 questions about skill and competence.  
 18 THE COURT: I don't think that's what the claim is.  
 19 Sustained.  
 20 Q Mr. LaPierre, did you ever meet President Reagan?  
 21 A Yes.  
 22 Q How many times?  
 23 A Numerous times.  
 24 Q Did he ever consult you seeking advice on policy  
 25 issues?

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1 A Yes.

2 Q And was it primarily the Second Amendment issue or were

3 there other issues as well?

4 A It was the Second Amendment. It was hunting issues,

5 conservation issues. I actually had a chance to write a speech

6 that -- where he ended up delivering most of the speech to my

7 surprise.

8 Q Was he an environmentalist in terms of preserving land

9 for public use?

10 A Yes.

11 Q And did you have any conversations with about that with

12 him preserving land for access for hunters?

13 A Yes, we did.

14 MR. CORRELL: Your Honor --

15 Q Did you every meet George Bush, the elder.

16 A Yes.

17 Q Did you ever meet Arnold Schwarenegger?

18 A Yes.

19 Q Did he ever meet Al Gore?

20 A Yes.

21 Q Tell me about your relationship about Al Gore.

22 A It was -- it was very positive. When he was a senator

23 from Tennessee, we supported him and I had a relationship with

24 him and I knew Peter Knight, his administrative assistant and we

25 endorsed him in the campaign.

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1 Q Did there come a time when that support changed?

2 A Yes, it did. He wanted -- he decided he wanted to run

3 for president, and he would have to get through some of the

4 primaries like New York, and he -- I got a call from the office

5 saying that they were going to change their position on the

6 issue.

7 Q And how did that affect the decision as to whether to

8 support him or not?

9 MR. CONLEY: Objection. Hearsay.

10 MR. CORRELL: This is his decision, your Honor.

11 THE COURT: Any other ground for the objection?

12 MR. CONLEY: Relevance, your Honor.

13 THE COURT: Sustained.

14 MR. CORRELL: Your Honor, this is this man's day in

15 court, and I have time that I should be able to use however

16 I like.

17 If I want to put matters of what you might think is

18 marginal relevance before the jury, that's certainly his

19 right to do so. I would be happy to move quickly through

20 this, but I take exception to these rulings. I'll try to

21 move on.

22 Q Mr. LaPierre, would you -- did there ever come a time

23 when you appeared on the morning program for CBS?

24 A Yes. Numerous times.

25 Q What was the purpose of appearing on CBS on behalf of

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1 the NRA?

2 A To be the voice of our members. I always viewed one of

3 the roles of the organization -- as I've said, the life blood is

4 our membership and to be their voice and to amplify their voice.

5 I mean, it's one of the reasons people join any advocacy groups,

6 whether it's Sierra Club, the -- you name it. The NRA -- pick

7 your issue. They join those groups to be their voice.

8 Q Is this something you wanted to do?

9 A No. I've never really been a media guy, but I -- I --

10 it was something I really had no training in, but I understood

11 that if I was going to do my job, it was one of the things I

12 needed to learn and needed to do.

13 Q Did you appear on CNN in this -- I'm talking back in

14 the eighties.

15 A Yes.

16 Q And was there anyone else in the organization that was

17 willing to step up and appeared on TV and speak for the Second

18 Amendment?

19 A No. I was the first person to do media for the NRA,

20 and I continued for a long time to be the only person doing

21 media for the NRA.

22 Q And was that written in the Bylaws that it was your

23 duty to do media for the NRA?

24 A No.

25 Q Was that something that your job just evolved into that

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1 no one wanted to do?

2 A Yes.

3 Q And did that come at any personal cost to you?

4 A Yes, it did.

5 Q And what was that cost?

6 A Well, as the issue got more controversial, I mean, I

7 gave up my anonymity. People would recognize you everywhere,

8 everywhere, based on the fact they had been watching TV or

9 reading their newspaper, and it -- as the issue got more

10 antagonistic, it became more -- it entailed more controversy.

11 Q Did you ever appear on the Oprah Winfrey show?

12 A Yes, I did.

13 Q When was that?

14 A Oh, my gosh. I can't -- I appeared I think twice on

15 the Oprah Winfrey show, and I think the first time may have been

16 sometime in the late eighties, early nineties. I'm not

17 exactly -- early nineties.

18 Q I'd like to direct your attention to the document that

19 appears behind Tab 628.

20 Do you recognize that document?

21 A Yes, I do.

22 Q What it is?

23 A It is a thank you from Oprah for being on -- a guest on

24 her show.

25 Q Does that refresh your recollection as to the time

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1 period in which you appeared?  
 2 A Well, the letter says August 20, 1990, so it would have  
 3 been probably a week or two before that.  
 4 Q And at that time what was your -- the title you held at  
 5 the NRA?  
 6 A I was Director of the Institute for Legislative Action  
 7 which is the political and legislative affairs of the  
 8 association.  
 9 MR. CORRELL: Your Honor, I would move the  
 10 admission of this letter into evidence --  
 11 MR. CONLEY: Objection.  
 12 MR. CORRELL: -- to show his growing profile in the  
 13 national scene. It's relevant to security, and it's  
 14 relevant to scope of duties.  
 15 MR. CONLEY: Object to relevance and hearsay.  
 16 THE COURT: This one, I'll overrule.  
 17 Is there an exhibit number on this.  
 18 MR. CORRELL: It would be WLX 231.  
 19 THE COURT: Are you marking these on the document?  
 20 All right. I mean, typically when they are not  
 21 electronically on the document, we have the court reporter  
 22 do it.  
 23 MR. CORRELL: We will catch up at the break.  
 24 THE COURT: It's important that we keep careful  
 25 notes of these things. Okay.

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1 MR. CORRELL: Things are moving pretty fast in the  
 2 trial. We understand that we are doing the best we can.  
 3 So I move that, and would you please put that up on  
 4 the screen, the letter from Oprah.  
 5 Q So at this time you're head of ILA; correct?  
 6 A Yes.  
 7 Q And were you doing anything with celebrities at this  
 8 point to try to assist or to benefit the NRA?  
 9 A Yes, I was. I was working the Hollywood community.  
 10 There were folks out in Hollywood that was speaking out against  
 11 the NRA because people had different opinions. They didn't  
 12 agree with the NRA. I didn't want to concede Hollywood to the  
 13 other side. I thought they had a tremendous influence on  
 14 American cultures. I mean, it's wide -- as I have said, people  
 15 hire celebrities to do ads for them on all kind of commercials,  
 16 and there were tremendous amount of people in Hollywood that  
 17 owned firearms and enjoyed the shooting sports, and I wanted to  
 18 recruit them and also show that they were participating in the  
 19 shooting sports as a mainstream activity in American society and  
 20 also show their identification with the NRA to help keep the NRA  
 21 in the mainstream of American society which I always felt the  
 22 NRA -- that's what the NRA is.  
 23 Q And did you have any success in trying to develop  
 24 relationships with celebrities on behalf of the NRA?  
 25 A Yes, we did. We had a lot of success.

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1 Q And can you tell the jury who Charlton Heston is?  
 2 A Charlton Heston was a legendary actor for the Ten  
 3 Commandments. He played Moses. He would -- Ben-Hur. All kind  
 4 of movies in the fifties and sixties. Greatest Show On Earth,  
 5 he was on that and later on, he did a bunch of shows that  
 6 younger people tend to remember like Planet of the Apes and  
 7 Soylent Green which was, you know, kind --  
 8 MR. CONLEY: Objection.  
 9 A People would come up to him and say I loved you in  
 10 Soylent Green. What the heck. I played Moses. You don't  
 11 remember that?  
 12 Q Did there come a time when Charlton Heston began to  
 13 work with the NRA to present shoots for celebrities?  
 14 A Yes, he did. We started in the late eighties or mid to  
 15 late eighties with a Charlton Heston Celebrity Shootout in Los  
 16 Angeles. We invited all kind of celebrities down to it that --  
 17 and it turned out to be a big success. It was a -- it was a  
 18 competition, but it was more fun than anything else. It was --  
 19 but it was a competition.  
 20 Q Was the purpose to benefit any particular group?  
 21 A The funds went to the -- many time -- most of the time,  
 22 the U.S. Olympic Shooting Team.  
 23 Q Directing your attention to the document that appears  
 24 behind Tab 69.  
 25 Do you recognize that document?

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1 A Yes. That is the program for the Charlton Heston  
 2 Celebrity Shoot from 1990.  
 3 Q And --  
 4 MR. CORRELL: Your Honor, I will move this into  
 5 evidence.  
 6 MR. CONLEY: Object on relevance and hearsay.  
 7 THE COURT: Sustained.  
 8 Q Was a magazine produced to commemorate the celebrity  
 9 shoots?  
 10 A Yes. They did a program, and they did a -- we did a  
 11 book on it too.  
 12 Q Was that used to benefit the NRA by increasing its  
 13 visibility in the Hollywood community?  
 14 A Yes, it was. It actually showed how many people -- I  
 15 mean, 40 million people at that time were engaged in the  
 16 shooting sports, and it -- and it showed -- Hollywood was no  
 17 different. There were tremendous amount of people out in  
 18 Hollywood that tended to enjoy the shooting sports.  
 19 Q Was there another celebrity shoot held in 1991?  
 20 A Yes.  
 21 Q And was that also to benefit the United States Olympic  
 22 Shooting Team?  
 23 A I believe that -- it probably was. Many of them did.  
 24 Q Directing your attention to the document that appears  
 25 behind Tab 70. Do you recognize that document?



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1 A Yes, that is -- that is the program for the Charlton  
2 Heston Celebrity Shoot in 1991.  
3 Q Does that refresh your recollection?  
4 A Yes, it does.  
5 Q Now what, if anything, happened in 1991 that affected  
6 you personally with respect to the NRA?  
7 A In 1991, I was elected executive vice-president of the  
8 organization.  
9 Q And do you believe as you sit here today that that was  
10 in part due to the efforts you had made on behalf of the NRA up  
11 to that moment?  
12 A Yes, I do because I actually didn't want the job. I  
13 tried to- I wanted to stay in the legislative political area. I  
14 really loved the legislative process. I loved the back and  
15 forth, the give and take of all of it. I really enjoyed working  
16 with all the people I had a chance to work with, and I tried to  
17 recruit a number of people.  
18 I actually had Congressman John Dingle agree to take  
19 the job for one night till his wife talked him out of it, and I  
20 talked to people that were high up in the Army, the Navy, tried  
21 to get them to do it. People kept saying no, Wayne. Look, you  
22 know out -- they know you. The members know you. You have been  
23 out doing media. You have been out doing speeches for the  
24 members. The membership really knows you. You ought to be the  
25 guy, and we will support you, and that's how I ended up being

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1 the candidate.  
2 Q Did you have any reservations about stepping up to the  
3 top position of EVP of the NRA?  
4 A I did because it really wasn't -- it wasn't my  
5 background. It really wasn't what I loved doing to tell you the  
6 honest truth and -- but I also knew that there needed to be a  
7 strong NRA in terms of membership. In terms of NRA had lost  
8 about a half a million members. NRA was running at a deficit.  
9 I knew that if the organization as a whole was to  
10 succeed, it needed to have a strong NRA. And ultimately, as I  
11 have said, even though I tried to recruit other people, that's  
12 how I ended up running for the job.  
13 Q So would it be fair to say that you put the interest of  
14 the NRA ahead of your own interest with respect to that  
15 decision?  
16 MR. CONLEY: Objection. Leading.  
17 THE COURT: I'll give you that one.  
18 MR. CORRELL: Thank you, your Honor.  
19 THE COURT: You can answer.  
20 Q Did there come a time --  
21 THE COURT: You can answer it.  
22 A I mean, I did because I really wanted to stay director  
23 of the Institute For Legislative Action because that was my  
24 background. That was my expertise, and that's what I really  
25 enjoyed doing.

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1 Q Did there come a time when you -- when the duties --  
2 well, let me ask you this.  
3 When you took the job, what -- did you have any  
4 understanding as to what the official duties of the job were?  
5 A Well, before that, it had been basically just managing  
6 the internal day-to-day affairs of the association, the  
7 magazine, overseeing some of the marketing. It wasn't so much  
8 out-facing. It -- when I got in there, I kind of changed the job  
9 description.  
10 Q And what was the new job description -- what did the  
11 job description become?  
12 A Well, I felt that as I've said many times before today,  
13 the strength of the NRA was in its members. The strength of the  
14 NRA was being the voice of its members. I felt that if we were  
15 going to be successful and grow the organization, I needed to be  
16 out there in front of America, whether it was TV, radio, whether  
17 it was newspaper. I needed to be out there doing speeches all  
18 over the country. I needed to be out through meeting with  
19 donors. I needed to be directly involved with the fundraising,  
20 the advertising, the marketing, just everything that involved  
21 the out-facing responsibilities to celebrities to mainstream -- I  
22 always felt the way the NRA would lose is if it got pushed to  
23 the fringe. And I always felt that one of my major jobs at the  
24 NRA was to keep the NRA as to what I always believed it was was  
25 the mainstream of American Society that supported the right to

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1 own a firearm under the Constitution and supported the programs  
2 and the shooting sports. And so I expanded into things like  
3 that had influence on the culture like NASCAR and the NFL  
4 alumni, and I had somebody go to the NBA and I had people -- I  
5 still worked Hollywood and all of that out-facing type stuff.  
6 (Continued on the following page.)  
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1 Q Did you also invite people to debate the issue with  
2 you?  
3 A I did.  
4 Q And did you ever invite Congressman Schumer to debate  
5 the issue with you?  
6 A I did. We debated numerous times.  
7 Q Please turn your attention to the document that appears  
8 behind tab 71, if you would.  
9 Do you recognize that document?  
10 A I do. That is a debate with Charles Schumer from "Meet  
11 the Press."  
12 Q Can you read the date on that, on the bottom?  
13 A Yeah, I believe he was a Congressman at the time. I  
14 don't think he was yet the Senator, but it would have been 1991,  
15 right about the time I was elected EVP.  
16 MR. CORRELL: Your Honor, move the admission into  
17 evidence.  
18 MR. CONLEY: Objection, relevance.  
19 MR. CORRELL: It's is relevant to show his rising  
20 visibility on increasing security issues. He was becoming a  
21 well-recognized face.  
22 THE COURT: That's overruled.  
23 It is admitted.  
24 (Whereupon, at this time Exhibit WLX 234 was  
25 admitted and received into evidence.)

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1 MR. CORRELL: Would you please publish the --  
2 THE COURT: Is there a number?  
3 MR. CORRELL: 234.  
4 (Shown to the jury)  
5 Q Your haircut has improved, but it is now the nineties.  
6 All right, could you just very briefly tell us kind of  
7 the tone and tenor of those debates? Was it respectful and  
8 civil or was it angry people shouting at each other?  
9 MR. CONLEY: Objection, relevance.  
10 THE COURT: I'll overrule for now. I'm not sure  
11 where it is going. You can answer.  
12 Q Please answer.  
13 A It was civil. I mean, that was a time back in  
14 Washington when people didn't all hate each other. I mean, it  
15 was a time when democrats and republicans got along with each  
16 other, even though they might have disagreed on issues.  
17 It was debated where people would disagreed with -- I  
18 worked with NRA. They disagreed with me. I could still be  
19 friends with them.  
20 I mean, I was friends with Sarah Brady. I mean, it was  
21 just a different times. It was a better time in my opinion than  
22 what it is now.  
23 Q Did you work with Sarah Brady to try and find common  
24 ground on the gun policy issue?  
25 A We did.

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1 Q And did you have any success with that?  
2 A The one we had the -- we ended up disagreeing on what  
3 was so-called the Brady bill, which was a wait. It did not have  
4 a check. We thought it ought to be with a check without the  
5 wait because there were people walking through restraining  
6 orders all the time and threatening people, and we thought some  
7 people might need to buy a firearm for an immediate threat.  
8 So, we put an amendment on that bill to -- when the  
9 technology became available to do a check, if you walked into a  
10 gun store and you wanted to buy a firearm, they would do an  
11 immediate check on your background and if they got a yellow  
12 flag, they got an additional three days.  
13 Q Did you view as part of your duties as the executive  
14 vice president reaching out to communities that were not  
15 typically represented previously within the NRA?  
16 A I did.  
17 Q And what steps did you personally take with regard to  
18 that outreach?  
19 A Well, I always thought that if -- I mean, the truth is  
20 NRA from its beginning was always one of the most diverse  
21 organizations in America going back to its founding. I mean,  
22 we had African American members going back to the very beginning  
23 of the NRA. We probably had Hispanic members, but the media  
24 kept trying to characterize the organization as an organization  
25 of white men and which it wasn't.

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1 I mean, it had a proud history with the African  
2 American community going back forever, and I wanted to make it  
3 more diverse in terms of women, in terms of Hispanics. I wanted  
4 it to look like America.  
5 Q Did there come a time when you were invited to attend a  
6 dedication of a memorial to African Americans who had served in  
7 the armed forces?  
8 A I did. NRA, we -- some of our proud members were  
9 Buffalo soldiers which were some of the original African  
10 American regiments that were formed during the Civil War. They  
11 were going to -- Colin Powell was working on dedicating a  
12 monument in Leavenworth, Kansas, for the Buffalos, to honor the  
13 Buffalo soldiers.  
14 So, I got NRA involved with that. We contributed money  
15 to that, and it was amazing to me. Some of the Buffalo soldiers  
16 actually showed up. And I remember one in particular and I  
17 named James Madison, pulled out his membership card. He was  
18 94 years old, and he pulled out his membership card from  
19 fifty years ago.  
20 So, we were proud to be involved in that monument and  
21 the dedication of it and proud of those -- to have those Buffalo  
22 soldiers as NRA members.  
23 Q Did you arrange for the NRA to publicize the dedication  
24 ceremony and the group in your official publications?  
25 A Yes.

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1 Q Direct your attention to Tab 72.  
 2 Do you recognize the document that appears behind that  
 3 tab?  
 4 A Yes, I do. That's the article from the American  
 5 riflemen from our magazines. It went in all of them, and  
 6 there's actually a picture of the James Madison I was talking  
 7 about. I said fifty years. It was forty years.  
 8 Q And the -- how many people received the magazines from  
 9 the NRA? What's the circulation, do you know? What was it back  
 10 then?  
 11 A Well, most of our members did. I think about this  
 12 time, which would have been -- I think you said it was '92. It  
 13 probably would have been about just under 3 million.  
 14 Q Did you see it as part of the mission of the NRA to  
 15 educate people about the history of the armed forces and their  
 16 use of firearms?  
 17 A Yes, that's in the Bylaws.  
 18 Q And did you see it as part of your mission to support  
 19 other charitable organizations who were doing good work that  
 20 shared common interests with the NRA and supported the mission?  
 21 A Yes.  
 22 MR. CORRELL: Your Honor, I move this document into  
 23 evidence.  
 24 MR. CONLEY: Objection on relevance and hearsay.  
 25 MR. CORRELL: Your Honor, it goes to mission. It

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1 goes to profile. It goes to the NRA providing support for  
 2 other charitable organizations.  
 3 The attorney general has taken the position that  
 4 there was something wrong with the NRA providing donations  
 5 to other organizations, and this is evidence that they did  
 6 it routinely for years.  
 7 THE COURT: I still don't see -- it's not that it  
 8 is uninteresting, but I don't see it having anything to do  
 9 with the claims in this case. Sustained.  
 10 I'll let you have the testimony for background, but  
 11 this is not an admissible exhibit. It has nothing to do  
 12 with the claims in this case, so sustained.  
 13 MR. CORRELL: Let me take another try, your Honor.  
 14 There's an picture of Charlton Heston in here who  
 15 became the president of the NRA, and this goes to the role  
 16 that the president -- I'm sorry -- became the president, to  
 17 the role that the president was asked to play and the  
 18 question of the scope of Mr. LaPierre's duties is at the  
 19 heart of this case. The question is, did he do his duty to  
 20 this organization.  
 21 And this is part of showing what the duty of the  
 22 leaders of the organization was.  
 23 THE COURT: Still sustained.  
 24 Q Mr. LaPierre, who is Louise Mandrel?  
 25 A Louise Mandrel was a singer and a performer in country

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1 music.  
 2 Q And did you have any involvement with working with  
 3 Louise Mandrel to further the mission of the NRA?  
 4 A Yes, I did. She also enjoyed the shooting sports and  
 5 NRA worked with Louise Mandrel on a celebrity shoot that was  
 6 held in Nashville, which was primarily from the country music  
 7 community and benefitting the Boy Scouts of America.  
 8 MR. CORRELL: Your Honor, \* move the admission into  
 9 evidence of the document that appears behind -- well,  
 10 actually let me lay the Foundation.  
 11 Q Can you turn your attention to the document that  
 12 appears behind Tab 73.  
 13 A Yes.  
 14 Q And do you recognize that document?  
 15 A Yes. It is a picture of the program for the Louise  
 16 Mandrel celebrity shoot.  
 17 Q Is this something that the NRA supported?  
 18 A Yes.  
 19 Q Did you view that as part of the mission to support  
 20 programs like this?  
 21 A I did.  
 22 MR. CORRELL: Move its admission into evidence,  
 23 your Honor.  
 24 MR. CONLEY: Objection on relevance and hearsay.  
 25 THE COURT: Sustained.

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1  
 2 MR. CORRELL: Your Honor, would this be a good time  
 3 to break, to take our morning break?  
 4 I can keep going if you'd like. I don't want an  
 5 uncomfortable jury.  
 6 THE COURT: Well, neither I do.  
 7 Does the jury need a short break? I see some  
 8 nodding. Okay, we'll take a short break.  
 9 COURT OFFICER: All rise, jury exiting.  
 10 THE COURT: It may actually be a little longer than  
 11 a short break because I have to do a couple of the things  
 12 with the lawyers here.  
 13 (Whereupon, at this time the jury then left the  
 14 courtroom.)  
 15 (Whereupon, the witness stepped down.)  
 16 THE COURT: Have a seat.  
 17 I mentioned earlier I wanted to cover -- I'm trying  
 18 to use all the time we have here, and this is the only  
 19 on-the-record time where I can use to give rulings on  
 20 various things without wasting the jury's time.  
 21 So, I'm going to run through two motions that are  
 22 pending and one issue that the parties have been debating in  
 23 connection with instructions.  
 24 The first is the NRA's motion to dismiss the EPTL  
 25 claims based on vagueness.

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1 This was a pretrial motion to dismiss Motion  
 2 Sequence 86. We had a memorandum in support. I had  
 3 deferred the opposition briefing; although, I got briefing  
 4 on at least a procedural issue through letters and the  
 5 parties have continued to send me things on this issue, and  
 6 I think it is ripe for decision since I think I have the  
 7 NRA's position pretty clearly.

8 The motion is denied on two independent grounds:  
 9 First, it violates the single motion rule  
 10 contained in CPLR 3211(e), which states that "no more than  
 11 one such motion shall be permitted."

12 The NRA moved to dismiss the EPTL claim in  
 13 June 2022, having previously filed motions to dismiss prior  
 14 versions of the complaint. In that 2022 motion, the NRA  
 15 raised a number of challenges to the EPTL claim and the  
 16 proposed relief sought by the attorney general, but it did  
 17 not include any argument that the statute was  
 18 unconstitutionally vague.

19 I denied the motion on the merits, and that ruling  
 20 was recently affirmed on appeal.

21 That decision is at 222 A.D.3d 498, First  
 22 Department (2023).

23 The current motion is not based on new facts or a  
 24 change in the law, and the NRA's vagueness argument clearly  
 25 could have been asserted in one of its earlier motions to

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1 dismiss or even for summary judgment, I suppose, but was  
 2 not.

3 I would cite the Landes case, L-A-N-D-E-S, from the  
 4 First Department, 137 A.D.3d 694, where the court said  
 5 "Given that defendants had the full opportunity to raise  
 6 their current CPLR 3211(a) arguments on their original CPLR  
 7 3211(a) motion to dismiss, the IAS court correctly denied  
 8 the motions as violative of the single motion rule of CPLR  
 9 3211(e)."

10 Instead, the motion was filed on the eve of trial.  
 11 This is, in my view, precisely the inefficiency that the  
 12 single motion rule was designed to prohibit. The NRA's  
 13 suggestion that this motion is a challenge to the court's  
 14 subject matter jurisdiction is both I think inaccurate and  
 15 irrelevant. I don't think it is a challenge to subject  
 16 matter jurisdiction.

17 In any event, the CPLR 3211 simply says that  
 18 certain kinds of motions don't have to be raised in the  
 19 answer at the answer stage. You can raise it later. It is  
 20 not an exception to the single motion rule.

21 In any event, so it doesn't mean that a successive  
 22 motion under 3211 would be the right vehicle to raise this  
 23 issue anyway.

24 So, it's procedurally improper first of all. Even  
 25 if it was not procedurally improper, the motion also fails

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1 on substantive grounds. In a nutshell, the NRA argues that  
 2 because the phrase "proper administration" is not defined in  
 3 the statute, and that the attorney general has not  
 4 promulgated rules and regulations to elaborate on its  
 5 meaning, and therefore the statute fails to provide adequate  
 6 notice or guard against discriminatory enforcement and  
 7 therefore is unconstitutionally vague.

8 I disagree with that argument. The phrase "proper  
 9 administration" has been used for many years in the context  
 10 of trusts and estates, which is the context of the EPTL.

11 I have relied on authorities in that area  
 12 to develop jury instructions that apply a straightforward  
 13 standard that has been applied to trustees for many years.

14 By contrast, the cases on which the NRA relies,  
 15 principally, address the use of the phrase "proper  
 16 administration" in other statutes as a generic principle,  
 17 and in some of those situations courts have questioned  
 18 whether it was clear enough.

19 For example, in *People versus Pickett*, 19 NY2d 170  
 20 from 1967, the Court of Appeals addressed a statute that  
 21 criminalized a "wilful act designed to interfere with the  
 22 proper administration of public assistance" programs. And  
 23 even there, the court found that any concerns about  
 24 vagueness could be addressed by construing the statute  
 25 consistent with the legislative intent to prohibit only acts

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1 motivated by fraud.

2 Very different in our case. Here, I think we can  
 3 apply traditional and well-established law imposing a duty  
 4 of good faith and ordinary care on trustees, and that  
 5 undermines any argument that the statute is  
 6 unconstitutionally vague. So, the motion is denied.

7 Next, moving to the motion by the individual  
 8 defendants for a directed verdict, or at least a portion of  
 9 that motion that is focused on the EPTL claims brought  
 10 against those defendants under -- and the motion is for a  
 11 directed verdict under CPLR 4401. The reminder of the  
 12 motion is deferred to posttrial, but that branch of the  
 13 motion is granted.

14 Unlike the NRA's successive motion to dismiss, this  
 15 motion was brought appropriately at the close of the  
 16 plaintiff's case at trial. And unlike the NRA's motion,  
 17 this one has merit as applied to the EPTL claims asserted  
 18 against the individual defendants, which are in any event  
 19 largely, if not entirely, duplicative of the remaining  
 20 claims against them under the N-PCL statute based on exactly  
 21 the same conduct.

22 Granting this portion of the directed verdict  
 23 motion will also serve a salutary effect of uncluttering the  
 24 claims and providing a clearer path for the jury to make its  
 25 decisions without having though grapple with a morass of

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1 similar claims against the same people for the same conduct  
 2 seeking the same damages, but based on statutes with  
 3 different names and somewhat different language but the same  
 4 basic standard of conduct. I'll go through that in a little  
 5 bit more detail.

6 First, as I mentioned when this motion was first  
 7 made, I listened intently during the attorney general's case  
 8 in chief at trial for any evidence that would support a  
 9 reasonable jury finding that the individual defendants are  
 10 trustees under the EPTL statute. And "trustees" is defined  
 11 in relevant part to include individuals "holding and  
 12 administering property for charitable purposes, whether  
 13 pursuant to any will, trust, or other instrument or  
 14 agreement, court appointment, or otherwise pursuant to law  
 15 over which the attorney general has enforcement or  
 16 supervisory powers." And I did not at the time and I have  
 17 not since found any such evidence having been introduced.

18 Obviously, there's no will, trust, other instrument  
 19 or agreement, or court appointment applicable here. So the  
 20 only source of a trustee designation would be the general  
 21 phrase "otherwise pursuant to law."

22 In that regard, the cases on which the attorney  
 23 general principally relies are readily distinguishable. The  
 24 first one Schneiderman versus Lower Esopus Riv. Watch, Inc.,  
 25 which has been sometimes abbreviated as ELRW, the individual

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1 role in the administration of the NRA and were granted  
 2 substantial authority over the administration and  
 3 disbursement of its charitable assets" or because they  
 4 "manage the organization and administer or control its  
 5 finances." That's from a letter at NYSCEF 3021 at pages 2  
 6 to 3. But if the statutory phrase "holding and  
 7 administering property for a charitable purposes" were so  
 8 broadly defined it would apply to essentially every officer  
 9 and many senior employees, essentially, every charitable  
 10 not-for-profit corporation in the state, likely in the  
 11 thousands of people. I think it could apply just as easily,  
 12 for example, to all members of the Finance division of the  
 13 NRA who were charged with monitoring and overseeing accounts  
 14 payable and expense reimbursements.

15 Such a vague and boundless definition of "holding  
 16 and administering" in this context in my view would raise  
 17 legitimate due process concerns, with those thousands of  
 18 individuals having no effective notice of their obligations  
 19 under the statute, as that can be contrasted with the N-PCL  
 20 statute under which each of them knows or should know that  
 21 they are bound, what they are bound by when they accept a  
 22 position as an officer of a not-for-profit corporation.

23 I've read all of the trial court decisions cited by  
 24 the attorney general in which individuals were found to be  
 25 trustees based on their employment or association with

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1 defendant there as reflected in the court opinion was sued  
 2 as an alter ego or that the entity was an alter ego of that  
 3 individual and he was essentially the sole decisionmaker of  
 4 the charitable foundation, which itself had failed to make  
 5 the required filings under the EPTL for years.

6 The AG also relies on People versus Trump, 62  
 7 Misc.3d 500, Supreme Court, New York County (2018).

8 In that case, the claims were asserted against the  
 9 named founder of the Trump Foundation and his children who  
 10 were essentially the board of directors and sole driving  
 11 forces of the Foundation. Those cases bear very little  
 12 resemblance to this case.

13 Here, the individual defendants are employees of  
 14 the NRA. To be sure, they're senior employees and corporate  
 15 officers even, but employees nonetheless with specified  
 16 spheres of operation and subject to the overarching  
 17 governance of the board of directors. While one can imagine  
 18 a situation which an officer or employee would be so clearly  
 19 tasked with "holding and administering" charitable assets so  
 20 as to satisfy the statutory definition, in my view listening  
 21 very carefully the evidence here does not support such a  
 22 finding as to these individuals.

23 The attorney general suggests without support in  
 24 the case law or statute that "each of the individual  
 25 defendants is a trustee because they played a substantial

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1 not-for-profit entities. They uniformly contain little, if  
 2 any, analysis of the issue; and most of them arose at the  
 3 motion to dismiss stage, rather than on a trial record as I  
 4 have.

5 I do want to make clear that this holding is  
 6 limited to the specific facts and evidence presented in this  
 7 case and does not suggest a broad restriction against  
 8 applying the EPTL to corporate officers or directors. Under  
 9 different circumstances and, more importantly with different  
 10 evidence, a different result might well be appropriate.

11 Second, and independently, the EPTL claims against  
 12 the individual defendants are duplicative of the N-PCL  
 13 claims against those same defendants. The basic factual  
 14 allegations are the same, the monetary damages are the same  
 15 and the standard of care based on the traditional definition  
 16 of proper administration in the estate context is  
 17 essentially the same as that contained in the N-PCL.

18 Although the attorney general suggests somewhat  
 19 broader injunctive remedies might be available only under  
 20 the EPTL, specifically a lifetime ban on working for other  
 21 charitable organizations doing business in New York, in my  
 22 view that is not a persuasive basis to retain it as a  
 23 separate claim.

24 Although all of the individual defendants deny that  
 25 the attorney general has the authority to seek a lifetime

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1 ban on their employment under any of the statutes at issue,  
 2 Mr. Phillip's counsel makes the correct point that "there is  
 3 no relief that the plaintiff is seeking under EPTL Section  
 4 8-1.4 that would not also be recoverable under the court's  
 5 equitable powers as to the plaintiff's N-PCL claims."  
 6 That's from their letter at NYSCEF 2925.  
 7 Third, in looking at the overarching statutory  
 8 scheme governing charitable not-for-profit corporations, it  
 9 seems clear that the design is to subject individual  
 10 officers and directors to the statutory duty of care and  
 11 liability set forth clearly as to them in Section 717 and  
 12 720 of the N-PCL and various other sections of that statute.  
 13 The NRA, by contrast, is not subject to certain of  
 14 those positions, including 717; but instead is expressly  
 15 within the definition of trustees contained in the EPTL,  
 16 with the overarching obligation of properly administering  
 17 the entity's charitable assets. While again I am not making  
 18 a broad ruling that officers and employees cannot be  
 19 trustees, the statutory scheme provides to me a further  
 20 basis for narrowing the charges so that the individual  
 21 defendants in this case are answerable for their behavior  
 22 under the N-PCL and the NRA is answer able for its behavior  
 23 under the EPTL.  
 24 Fourth, and last, the winnowing or pruning of these  
 25 charges also reduces in my view the risk of jury confusion

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1 through, hopefully, quickly and get the jury back here.  
 2 First, the N-PCL provides that "a Type B or C  
 3 not-for-profit corporation formed prior to July 1, 2014,  
 4 shall be deemed a charitable corporation for all purposes  
 5 under this chapter." That's from N-PCL Section 201(c).  
 6 It is undisputed that the NRA was a Type B  
 7 not-for-profit in New York since at least 1973 at its own  
 8 election. So, the answer under the N-PCL is clear. It is  
 9 in fact a charitable not-for-profit corporation under the  
 10 N-PCL. The attorney general's historical analysis of the  
 11 NRA's filings since 1973 -- that's captured in part at  
 12 NYSCEF 2834 -- supports the conclusion that this was a  
 13 conscious choice of the NRA not to opt for designation as a  
 14 social club or other type of entity not deemed to be  
 15 charitable in nature. And I'm not relying on individual  
 16 intent here, whether they intended one way or another. It's  
 17 what they did. They made the choice to, to deem themselves  
 18 a Type B. The NRA's attempt to minimize the effect of that  
 19 choice made fifty years ago and not changed since then is  
 20 unpersuasive.  
 21 Second, the EPTL broadly defines the phrase  
 22 "charitable beneficiary" to include "the beneficiary of a  
 23 disposition for a religious, charitable, educational or  
 24 benevolent purpose." It is one of several ways in which  
 25 this statute and others sometimes defines the word

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1 that may arise from having multiple claims against the  
 2 individual defendants based on the same conduct, seeking the  
 3 same damages, under the same standards of care essentially  
 4 with different statutory language.  
 5 So, I think for all of those reasons, this is one  
 6 of those cases where the winnowing process I think is  
 7 appropriate at the directed verdict stage, and it will have  
 8 a beneficial effect on the case as a whole.  
 9 So, the directed verdict as to the individual  
 10 defendants is granted in that limited respect, and those --  
 11 it's three claims in total, one against each of the  
 12 individual defendants under the EPTL, it is dismissed.  
 13 Next, there has been a lot of letter writing  
 14 recently about the NRA's objections to being labeled in the  
 15 jury instructions or elsewhere as a "charitable  
 16 not-for-profit corporation" under the N-PCL and as  
 17 administering "charitable assets" under the EPTL.  
 18 With the latter, the NRA's view is that they are  
 19 only administering charitable assets in the narrow respect  
 20 of when the NRA's general funds are used in support of NRA  
 21 Foundation related projects. I find those arguments  
 22 collectively to be unpersuasive. This late in the game  
 23 attempt to drastically narrow the scope of the EPTL claim is  
 24 akin to a belated and inappropriate motion for partial  
 25 summary judgment. I have several reasons that I'll go

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1 "charitable" very broadly to include not only the word  
 2 charitable, but other things and in this one it's quite a  
 3 broad list. The NRA makes -- and that quote is from EPTL  
 4 Section 8-1.1(c)(ii).  
 5 The NRA makes creative arguments going back to its  
 6 founding argument in 1871 suggesting its original formation  
 7 as a social club, but the attorney general has the far  
 8 better argument that the EPTL incorporates the current  
 9 corporate law definition of the NRA as a charitable entity.  
 10 The EPTL defines a trustee, for example, to include  
 11 any nonprofit corporation organized under the laws of this  
 12 state for charitable purposes. That's from Section  
 13 8-1.4(a)(2). I see nothing in the EPTL language or history  
 14 to suggest that for each charitable not-for-profit  
 15 corporation the law requires us to go back to the original  
 16 founding documents, whether that be 1871 or whenever it  
 17 might be for each corporation, rather than the much more  
 18 obvious source which is the currently binding corporate law  
 19 which the entity itself chose to be organized.  
 20 I find support for that in the text of the EPTL  
 21 itself. There are numerous cross-references in the EPTL  
 22 statute to the N-PCL statute. Among others, 8-1.1(e) which  
 23 says "this paragraph shall not restrict in any manner the  
 24 ability to release or modify restrictions relating to  
 25 institutional funds under Section 555 of the not-for-profit

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1 corporation law. Subparagraph (g) of the same section says  
 2 that "the provisions of this paragraph shall not apply to  
 3 any corporation which is subject to Sections 509 through 511  
 4 of the not-for-profit corporation law." There are similar  
 5 kinds of cross references in Subsection (j) of that same  
 6 section.  
 7 Also, EPTL 8-1.7(2)(b) says that "this section  
 8 shall not restrict in any manner the appropriation for  
 9 expenditure or accumulation of the endowment funds as set  
 10 forth in Section 553 of the not-for-profit corporation law."  
 11 So, I cite these as examples that the legislature  
 12 clearly knew how to distinguish obligations under the N-PCL  
 13 when that was their intention.  
 14 As to the NRA's related argument that the EPTL  
 15 effectively adopts the Internal Revenue Code definitions of  
 16 501(c)(3) corporations, I would point out that the  
 17 legislature also knew how to incorporate federal tax law  
 18 definitions when it was their intention to do so in EPTL  
 19 itself. Section 8-1.8(a) says, for example, "for purposes  
 20 of this section, a trust means a private foundation as  
 21 defined in Section 509 of the United States Internal Revenue  
 22 Code of 1986." So, that's a specific definition of trust  
 23 for a specific section of the EPTL, and they specifically  
 24 called that an Internal Revenue Code section. They did not  
 25 do so in 8-1.4 which is the relevant provision here.

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1 THE COURT: In sum, the NRA's argument that it can  
 2 only be considered a trustee with respect to that portion of  
 3 its operations in which it holds or administered NRA  
 4 foundation assets is not supported by the text of the EPTL  
 5 statute is not supported by any case law. Instead, the  
 6 definition looks to New York Corporate Law under which the  
 7 NRA definitively is a charitable corporation.  
 8 So that concludes my analysis of that. I do  
 9 appreciate the exceptionally well-written and thoughtful  
 10 letters. I might appreciate if there were fewer of them,  
 11 but in seriousness, the scholarship and the thought behind  
 12 them all was I think very, very good.  
 13 So I'm sure there are still some other rulings that  
 14 you're waiting on, but I wanted to get those out while the  
 15 jury was on a break. I will now give you your biological  
 16 break. So I ask you to come back as quickly as you can so  
 17 we can get the jury back.  
 18 (Whereupon, at this time there was a recess taken.)  
 19 (Witness resumed the witness stand.)  
 20 THE COURT: Just to be clear, all other aspects of  
 21 the motions for directed verdict that was not specifically  
 22 addressed in what I just said are preserved and deferred  
 23 until after trial.  
 24 THE COURT OFFICER: All rise. Jury entering.  
 25 (Whereupon, at this time the jury entered the

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1 Instead, they opted for incorporation -- they opted  
 2 to incorporate the state corporate law statute in 8-1.4  
 3 which for these purposes is the N-PCL under which the NRA  
 4 plainly is deemed to be a charitable not-for-profit  
 5 corporation, full stop.  
 6 (Continued on next page)

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1 courtroom.)  
 2 THE COURT: Okay. Have a seat, please.  
 3 Okay. Mr. Correll, you may continue.  
 4 CONTINUED DIRECT EXAMINATION  
 5 BY MR. CORRELL:  
 6 Q Mr. LaPierre, did there come a time in the 1990's when  
 7 the IRS demanded a confidential list of members from the NRA?  
 8 A Yes.  
 9 Q And what can you tell us about that?  
 10 A Well, about the mid-1990's there was a -- the most --  
 11 I'm not a accountant. I'm not a CPA, but from what I  
 12 understand, it was the most intensive audit the IRS does on an  
 13 organization where they came into our building. They -- I  
 14 believe they put 12 agents in our building for a period of four  
 15 years going over everything for a number of years, and that's  
 16 what happened. And was the -- was it necessary for the NRA to  
 17 budget funds to defend against this audit?  
 18 MR. CONLEY: Objection. Relevance.  
 19 MR. CORRELL: Your Honor, the AG has attacked the  
 20 spending of money to respond to government attacks on the  
 21 NRA. This was a government attack on the NRA politically  
 22 motivated to cause the NRA to spend money. It's part of the  
 23 playbook for the Government agencies. It's documented, and  
 24 it's part of their history.  
 25 It informs his business judgment in making

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1 decisions to spend money defending this particular  
 2 Government attack.  
 3 THE COURT: Overruled.  
 4 MR. CORRELL: Thank you, your Honor.  
 5 Q Was there a budget item for spending in that case?  
 6 A Yes, there was. It was a large budget item. I believe  
 7 it was well over \$1 million.  
 8 Q And did you come to learn of the circumstances under  
 9 which the audit was ordered?  
 10 A Yeah.  
 11 MR. CONLEY: Objection.  
 12 THE COURT: You can talk about it in principle, but  
 13 we are not going to have a trial within a trial about  
 14 whatever was going on back then. That's 30 years ago. So I  
 15 will sustain the objection that I saw was bubbling up on the  
 16 left side here.  
 17 MR. CORRELL: Thank you, your Honor. I will try to  
 18 do it a different way and more quickly.  
 19 Q Do you remember making a statement, "I think there has  
 20 been a tendency to politicize a lot of the federal agencies in  
 21 the Clinton administration."  
 22 Do you remember ever making that statement?  
 23 MR. CONLEY: Objection.  
 24 THE COURT: Sustained. It's a --  
 25 Q Let me ask you this.

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1 THE COURT: Too far afield.  
 2 Q After the four-year ordeal, did you believe that --  
 3 well, what, if any, comfort did you derive from the NRA having  
 4 gone through that very close scrutiny by the IRS without the IRS  
 5 having found any substantial deficiencies?  
 6 MR. CONLEY: Objection.  
 7 MR. CORRELL: I'll do it another way, your Honor.  
 8 Q What was the result of the investigation? Was the NRA  
 9 required to pay the IRS anything?  
 10 A I believe that the -- Pricewaterhouse who was the  
 11 auditing firm told us that if NRA paid a -- some \$200,000 tax --  
 12 MR. CONLEY: Objection. Hearsay.  
 13 THE COURT: Overruled.  
 14 A -- on I believe it was some advertising item, they said  
 15 you'll probably be the only one ever to have paid this, that  
 16 will conclude the audit. So the NRA decided it was cheaper to  
 17 do that than to continue with the accounting and legal fees that  
 18 were falling on NRA with this audit.  
 19 Q And was that a business judgment that you made as the  
 20 executive vice-president?  
 21 A I did not make it. It was made by the -- I believe by  
 22 the fiscal directors and the Board of Directors and the finance  
 23 committee. I may have been consulted is. I just don't  
 24 remember.  
 25 Q Because you are not a tax lawyer; correct?

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1 A Correct.  
 2 Q And you are not a tax accountant.  
 3 A Correct.  
 4 Q Do you recall debating then US Congressman Charles  
 5 Schumer again in 1997 at a national press club luncheon?  
 6 A Yes, I do.  
 7 Q Was that part of your sort of continuing Ali versus  
 8 Forman events that you would engage in with Mr. Schumer?  
 9 MR. CONLEY: Objection.  
 10 THE COURT: I will Ali fought Forman only once but  
 11 Frazer three times.  
 12 MR. CORRELL: Right. Ali Frazer. Thank you, your  
 13 Honor.  
 14 Q Was it kind of a match, rematch, rematch sort of  
 15 relationship you had with Mr. Schumer?  
 16 MR. CONLEY: Objection on relevance.  
 17 THE COURT: Overruled.  
 18 A Yes, it was part of my continuing role to be the  
 19 spokesperson, to be the voice of our membership that I -- as of  
 20 my job responsibilities.  
 21 Q Did you think you won those debates?  
 22 A I think you would -- I think I did a -- I -- I think I  
 23 represented the NRA and then the voice of our members.  
 24 I mean, I felt that was my job, and that's what I did.  
 25 I -- I'll leave it how people felt watching as to whether I won

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1 or not. It probably depended on how they felt about the issue.  
 2 Q Let me turn your attention to other parts of the  
 3 mission of the NRA.  
 4 Does the NRA have a museum?  
 5 A Yes, we do.  
 6 Q And can you just tell us quickly what that museum is  
 7 and why the NRA has it?  
 8 A Yes. It's a wonderful museum. Virtually all the  
 9 firearms have been donated, and it basically tells the history  
 10 of firearms ownership in this country going back to a firearm  
 11 that came over on the Mayflower, and it goes all the way through  
 12 the various wars, the police firearms, the military firearms,  
 13 the firearms that were used in motion pictures, and just the  
 14 historical firearms in the history of the United States.  
 15 Q And how were those firearms acquired? Were they  
 16 purchased?  
 17 A Virtually all of them have been donated by people that  
 18 would like to have them displayed or by wills and estates that  
 19 would like them to be displayed.  
 20 Q One of the claims in this case is that you traveled  
 21 inappropriately to Budapest, Hungary.  
 22 Do you remember that question being raised?  
 23 A Yes, I do.  
 24 Q And is there a museum in Budapest, Hungary that also  
 25 collects firearms?



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1 A Yes, there is a major museum -- firearms museum.  
 2 Q When you went to Budapest, was it your intention to  
 3 advance the interest of the NRA by arranging for an exchange of  
 4 exhibits between your museum and the other museum?  
 5 MR. CONLEY: Objection. Leading.  
 6 Q What, if any, purpose did you have in going to  
 7 Budapest?  
 8 A I met with the firearms and military museum there, and  
 9 we talked about an exchange of firearms that would be displayed.  
 10 Q And were you able to close that deal?  
 11 A They said they were interested. I brought back their  
 12 cards. I handed them to our museum people and told them that  
 13 they were interested in doing a display exchange.  
 14 Q Would you please direct your attention to the document  
 15 that appears behind Tab 76 of your first binder and tell me  
 16 whether you recognize that document.  
 17 A Yes, it is a -- it's a -- it's a promotional piece for  
 18 our magazine. I mean, for our museum.  
 19 Q Does that museum exist today?  
 20 A It does.  
 21 Q Has that museum's funding been cut?  
 22 A No.  
 23 MR. CORRELL: Your Honor, I move this into evidence.  
 24 THE COURT: I'll admit it. It seems to be marked  
 25 WLX 211.

W. LaPierre - by Defendant - Direct/Mr. Correll Page 4122

1 Q Mr. LaPierre, let's turn our attention to the 2000's,  
 2 and thank you for your patience in the walk-through the eighties  
 3 and nineties.  
 4 There's been some talk in this case about the NRA  
 5 straying from its mission by getting involved with things like  
 6 the NASCAR or the NFL.  
 7 Can you tell the Court and the jury what your thinking  
 8 was about using your position as executive vice-president of the  
 9 NRA to try to cultivate relationships with let's start with  
 10 NASCAR?  
 11 A Yes. I mean, I -- as I said, I have always believed  
 12 that the NRA's strength is the fact it represents the mainstream  
 13 of this country, that it's the deepest part of the river, and  
 14 that -- that's been the strength of the organization.  
 15 I have also always believed that you can't just be a  
 16 political fighter. I mean, you've got to be culturally  
 17 relevant. And as part of showing that all of these institutions  
 18 have an impact on American culture, whether it's NASCAR, whether  
 19 it's the NFL, whether it's the NBA, whether it's country music,  
 20 whether it's celebrities, and they also participate in the  
 21 shooting sports, a lot of them do, and I felt that as part of  
 22 the showcasing -- part of the NRA mission is to showcase that  
 23 NRA is culturally relevant. We are part of the mainstream of  
 24 society, and here's examples of that.  
 25 So we hosted for years for the NFL alumni. We hosted a

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1 sporting clay's tournament at the Super Bowl for them, and that  
 2 would be -- we actually used -- got to use the NRA -- the NFL  
 3 logo with the NFL alumni on it.  
 4 Q So were you -- you weren't going to the Super Bowl just  
 5 for fun; right?  
 6 A No. We were going to host the charity event that we  
 7 were running for them and also to participate in the other  
 8 activities that they had in terms of meeting donors and meeting  
 9 other people and make -- build relationships for the NRA.  
 10 Q Please turn your attention to the document that appears  
 11 behind Tab 77.  
 12 Do you recognize this document?  
 13 A Do.  
 14 Q Would you tell us what it is?  
 15 A It's the -- one of the programs for the NFL Super Bowl  
 16 events that went on during the Super Bowl for the NFL alumni.  
 17 MR. CORRELL: Your Honor, I move this into  
 18 admission.  
 19 MR. CONLEY: Object on relevance and hearsay.  
 20 THE COURT: Sustained. You can use this as  
 21 background, but I'm going to try to reserve the exhibits to  
 22 the events that are at issue in the case.  
 23 MR. CORRELL: Your Honor, an issue has been raised  
 24 as to the proprietary of Mr. LaPierre flying to particular  
 25 locations for particular events.

W. LaPierre - by Defendant - Direct/Mr. Correll Page 4124

1 THE COURT: But not this one. In 2000.  
 2 MR. CORRELL: Your Honor, I'm not sure whether it's  
 3 generic. I think that there's a generic allegation that he  
 4 was using NRA funds to go places for personal reasons.  
 5 THE COURT: The jury is going to be instructed that  
 6 there is a relevant period of time for the claims and this  
 7 is before it.  
 8 MR. CORRELL: Fair enough.  
 9 Q There was a mention of NASCAR, and we -- I know that on  
 10 your -- in the Attorney General's case in chief, you were asked  
 11 a question about -- there was an issue raised about being in a  
 12 helicopter going to NASCAR, and I won't ask you to go over that  
 13 again. But can you tell us whether now as you sit here today  
 14 the NRA is continuing that relationship with NASCAR?  
 15 A As far as I know, we are. It would be through our  
 16 Office of Advancement. I know there was a continuing  
 17 relationship.  
 18 Q And is that --  
 19 A I'm not sure of the monetary level.  
 20 Q Is that something that you still believe is in the best  
 21 interests of the NRA to pursue?  
 22 A Yes, I do, on a number of levels.  
 23 One, a lot of the outdoor community, the shooting sport  
 24 community are involved in NASCAR.  
 25 An example that Bass Pro which is one of the major

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1 outdoor stores in America. They sponsored not only drivers but  
 2 they sponsored numerous races. It was a chance to meet donors.  
 3 In fact, we met one of our largest donors at a NASCAR race at  
 4 random. He saw me and he wanted to talk, and that's how we  
 5 built the relationship. And we also were even featured on  
 6 national TV doing Gentlemen, Start Your Engines with the NRA,  
 7 and it just helped in terms -- they want to push NRA off to the  
 8 fringe and say NRA is a bunch of fringe people and you shouldn't  
 9 support them when it's really a mainstream organization of every  
 10 religion, every race, every income level, and that's what this  
 11 reflected again.  
 12 Q Focusing on the year 2000, what was the level of your  
 13 profile in 2000?  
 14 A It was starting to get really raised. Charlton Heston  
 15 was in the process of beginning to step down, and I was having  
 16 to take on a lot of that additional profile. I could never be  
 17 Charlton Heston, but I tried my best to take on what I could.  
 18 Q So those were some big shoes to fill; fair to say?  
 19 A Fair to say.  
 20 Q Did you ever appear on the cover of Washington Post  
 21 Magazine?  
 22 A I did.  
 23 Q What year was that?  
 24 A I'm not sure. Probably sometime in the early 2000's I  
 25 would say.

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1 Q I direct your attention to the document that appears  
 2 behind Tab 78.  
 3 Do you recognize that document?  
 4 A I do.  
 5 Q And what is it?  
 6 A It's a cover of the Washington Post Magazine, and it --  
 7 it's a picture of me on the cover.  
 8 Q And the date is August 6, 2000.  
 9 Does that refresh your recollection?  
 10 A Yes, it does.  
 11 Q And the title of the article that appears is Eternal  
 12 Vigilance, Wayne LaPierre and the Revival of the National Rifle  
 13 Association by Michael Powell.  
 14 Do you see that?  
 15 A I do.  
 16 Q What was the revival that was being discussed? Had  
 17 there been a falling off of membership or revenue or anything  
 18 like that?  
 19 MR. CONLEY: Objection, your Honor. This is  
 20 hearsay. It's not admitted into evidence yet. He is being  
 21 asked to describe what the article --  
 22 MR. CORRELL: Move it into evidence, your Honor.  
 23 MR. CONLEY: We object on relevance and hearsay.  
 24 THE COURT: I'll admit it just for the fact there  
 25 was an article but not for the truth of any of the -- I

W. LaPierre - by Defendant - Direct/Mr. Correll Page 4127

1 haven't read through the article, but I'm sure it has lots  
 2 of factual statements.  
 3 This is again just admitted to show that this  
 4 existed, and he is on the cover. So for that limited  
 5 purpose, it's admitted.  
 6 MR. CORRELL: Thank you, your Honor. May I publish  
 7 it to the jury?  
 8 THE COURT: You may. Focusing on, yes, the  
 9 picture.  
 10 Q Thank you. And could you tell the Court and Jury what  
 11 personal knowledge you have as to the status of the National  
 12 Rifle Association in the year 2000?  
 13 A Yes. The Board of Directors had fired the two former  
 14 executive vice-presidents, and the NRA had lost hundreds of  
 15 thousands of members.  
 16 The NRA was also running at a substantial deficit, and  
 17 one of the things that I worked very hard at and succeeded when  
 18 I came in was turning that around.  
 19 Q And how did you do that?  
 20 A I did it by -- in a lot of different -- well, in many  
 21 different ways.  
 22 I mean, I worked really hard. I got people that really  
 23 knew how to fundraise and how to raise members. We worked very  
 24 hard in terms of advertising and getting the right advertising  
 25 out there in terms of mainstreaming the NRA.

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1 We -- I mean, all kinds of -- I got out there speaking  
 2 to our members all over the country, being the voice on TV or  
 3 being out walking everything from outdoor shows to you name it,  
 4 the invisible, but just -- just really making NRA what -- making  
 5 -- thanking people and making them feel part of this association  
 6 and rebuilding the core strength of the organization and the  
 7 mission, whether it was programs or whether it was advocacy.  
 8 You name it.  
 9 Q Is this when The Friends Program started around this  
 10 this?  
 11 A I did. I started the Friends of the NRA program which  
 12 was -- which was -- the idea was to showcase our strength in  
 13 individual communities.  
 14 I mean, I have always felt -- I said the strength of  
 15 the organization is people in these communities all over the  
 16 country that in their heart love the programs, whether it's  
 17 safety, training, education, hunter safety, but they also deeply  
 18 believe they have a right to own a firearm to protect  
 19 themselves.  
 20 I mean, most of the times, it's not even used but just  
 21 having one to be able to protect themselves. And we started  
 22 banquets all over the country to raise money for the NRA  
 23 Foundation which would go toward all of these charitable  
 24 activities, hunter safety, youth safety, Eddie Eagle. What do  
 25 you do if you see a gun? Stop. Don't touch it. Leave the

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1 area. Call an adult. Our 135,000 safety training instructors.  
 2 But it went into all these type programs, and we ended up with  
 3 about I think 1,300 dinners in communities all over the country.  
 4 And you know, it's pretty hard to say this organization is on  
 5 the fringe and doesn't represent when you see a community in  
 6 Wichita, Kansas or Portland, Maine where you have 500 people in  
 7 a room that represent that city. I mean --  
 8 Q Was it part of your job to go out and attend these  
 9 dinners?  
 10 A I attended as many as I could fit into my schedule.  
 11 Q And how many was that in a typical year?  
 12 A I don't know. At some point, it was probably one a  
 13 week. At other times, I did a couple of week. Sometimes I  
 14 probably didn't do anything. My schedule varied so much. I  
 15 would do all kind of speeches, political, friends dinners.  
 16 Q And how did you get to all these places back then?  
 17 A Back then I was flying commercial.  
 18 Q And did there come a time when your threat profile,  
 19 your risk profile changed and you felt you were facing different  
 20 circumstances?  
 21 MR. CONLEY: Objection. Leading.  
 22 THE COURT: Sustained.  
 23 Q I'll come back to that in a moment. Let's go back to  
 24 the year 2000.  
 25 Were you personally involved in any fundraising meeting

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1 with donors, stuff like that?  
 2 A Yes, I always was involved in that.  
 3 Q And back then was there a time where you met with  
 4 people from the Beretta family in an effort to raise funds for  
 5 the NRA?  
 6 A Yes, I did.  
 7 Q Could you just tell us quickly about that, if you  
 8 would?  
 9 A Well at that time Ugo Beretta who was the patriarch of  
 10 the family. I mean, he was -- that's a corporation that goes  
 11 back to 1538, and I -- he would come to the United States, and I  
 12 met with him when he was in the United States and he did a  
 13 substantial donation to the organization.  
 14 Q Would you turn your attention to the document that  
 15 appears behind Tab 79, please.  
 16 Do you recognize that document?  
 17 A Yes, I do.  
 18 Q What is it?  
 19 A I used to go out and speak at colleges all over the  
 20 country and sometimes do debates an college campuses. Sometimes  
 21 it was just an individual speech. There was a speech I did at  
 22 Mount Holyoke College.  
 23 Q And was this -- was any kind of a donation made in  
 24 connection with that appearance?  
 25 A No.

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1 Q I'm just looking at the -- there is a mention of  
 2 Beretta USA Benelli pledges \$1 million to endowment.  
 3 Do you see that?  
 4 MR. CONLEY: This is hearsay. The exhibit is not  
 5 in evidence.  
 6 MR. CORRELL: I'm just trying to refresh his  
 7 recollection, your Honor?  
 8 A I'm sorry. I was on 80. Are you on 79? I'm sorry.  
 9 You are on 79. I'm sorry. Yes. It's a picture of Mr. Ugo  
 10 Benelli presenting a million dollars endowment check to the  
 11 National Rifle Association.  
 12 Q And was that part of your outreach to Italy and the  
 13 Beretta family?  
 14 A Yes, it was. Although at this point the -- I met with  
 15 him in the United States when he was over here.  
 16 I have since done interviews with him in Italy. He  
 17 wanted me -- everyone else had been over there. I hadn't been  
 18 over there, and they wanted me to come over there, and I worked  
 19 with Ackerman McQueen, and I did a week-long session with the  
 20 Berettas, and my wife did interviews with Monique Beretta.  
 21 Q And is that something that you believed to be in the  
 22 best interest of the NRA?  
 23 A Yes.  
 24 Q Why?  
 25 A Because the Berettas were big supporters of the

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1 organization. They continue to be big supporters of the  
 2 organization. It also got them on record with really historic  
 3 interviews in terms of Ugo Beretta, the founding of the company,  
 4 the history of the company. It put his wife with a historical  
 5 document talking about how she got involved and her involvement  
 6 with the company and all that. So it -- I mean, they were very  
 7 happy about it. They were happy we did it, and we were happy  
 8 about it too. I mean, it showed NRA's outreach with the  
 9 industry.  
 10 Q Back to Tab 80. Could you just -- do you recognize  
 11 this document?  
 12 A I do.  
 13 Q What is it?  
 14 A It is a -- it's a sweepstakes we did to raise money for  
 15 the NRA, and it was based on our relationship with NASCAR.  
 16 Q I'm sorry. I think I asked you to look at 80, the  
 17 document.  
 18 A 80. I'm sorry. Yes, that is the one I was looking at  
 19 before. I'm sorry. That's -- I used to do a lot of college  
 20 speeches. I -- I think it's harder to do them now because there  
 21 is so much -- the atmosphere has changed so much, but I used to  
 22 do a lot, and this was when I was invited to speak at Mount  
 23 Holyoke College.  
 24 Q What year was that?  
 25 A 2001.

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1 THE COURT: They don't have a NASCAR event there;  
 2 do they?  
 3 THE WITNESS: No your Honor.  
 4 THE COURT: I didn't think so.  
 5 Q So speaking of cars, would you turn your attention to  
 6 the document that appears behind Tab 81.  
 7 Do you recognize that document?  
 8 A I do.  
 9 Q And what is it?  
 10 A It is a sweepstakes to attend six Winston cup race  
 11 weekends.  
 12 People would enter the sweepstakes. They could enter  
 13 without making a donation; although, most of them donated when  
 14 they would enter. So it was a -- it was a money raiser for the  
 15 National Rifle Association showcasing our relationship with  
 16 NASCAR.  
 17 Q And whose idea was that?  
 18 A It may have been mine. It may have been one of the  
 19 folks that work with us in the fundraising operation. I'm not  
 20 sure.  
 21 Q Did it work?  
 22 A It did. It did.  
 23 MR. CORRELL: Your Honor, I move its admission into  
 24 evidence of the -- of this document. Exhibit Number 243.  
 25 MR. CONLEY: Objection. Relevance. Hearsay.

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1 Tell me if -- tell me what that is.  
 2 A That is a debate again with Senator Schumer on -- on  
 3 Meet the Press that we did.  
 4 Q When did that occur?  
 5 A October 20, 2002.  
 6 MR. CORRELL: Your Honor, move the admission of  
 7 this document into evidence.  
 8 THE COURT: It's admitted.  
 9 MR. CONLEY: Object on relevance and hearsay.  
 10 THE COURT: Overruled. It's admitted. What's the  
 11 exhibit number; WLX 244?  
 12 Q At this point in your life, were you seeing more  
 13 attention being drawn to you or let me put it another way.  
 14 At this point in your life, what was the threat level  
 15 like? Were you starting to get attention?  
 16 A The threat level was starting to get higher. I mean, I  
 17 think the first time we understood there was a threat level was  
 18 back during the Unabomber. The FBI came and briefed us that we  
 19 were targets, and they advised me to register in hotels under a  
 20 different name.  
 21 MR. CONLEY: Objection, your Honor. Hearsay.  
 22 THE COURT: It's not hearsay. It's -- the fact it  
 23 was said is what it's being offered for, not necessarily  
 24 that it was true.  
 25 (Continued on the following page.)

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1 THE COURT: I'll admit the cover.  
 2 MR. CORRELL: The cover is fine.  
 3 THE COURT: Only. What's the exhibit number; 243?  
 4 MR. CORRELL: May I also just have the third page?  
 5 It evidenced the sweepstakes portion of this.  
 6 THE COURT: Yeah. Look, this is a --  
 7 MR. CORRELL: May 2002.  
 8 THE COURT: 2002.  
 9 MR. CORRELL: I'll settle for the cover, your  
 10 Honor. Thank you.  
 11 THE COURT: Quit while you're ahead.  
 12 MR. FARBER: Can we get an exhibit number for the  
 13 last one that came into evidence?  
 14 Q Thank you. Now in 2000, did you continue to have  
 15 debates within 2000's? Did you continue to have debates with  
 16 Mr. Schumer, then Senator Schumer?  
 17 A I did.  
 18 Q Right. And do you recall when in or around October of  
 19 2002?  
 20 MR. CONLEY: Objection. Relevance, your Honor.  
 21 THE COURT: Overruled.  
 22 A I did many, many, many, many debates with Senator  
 23 Schumer. I don't recall off my head 2002, but we did a lot.  
 24 Q Mr. LaPierre, Wayne, would you please direct your  
 25 attention to the document behind Tab 82.

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1 THE COURT: Right, that's the purpose of the  
 2 testimony.  
 3 MR. CORRELL: Just the notice of an increased  
 4 threat.  
 5 THE COURT: That he received those communications.  
 6 MR. CORRELL: Yes.  
 7 THE COURT: So, overruled.  
 8 A If I was leaving, I'd try to go out a back door and  
 9 things like that; but in 2002 the threat levels were really  
 10 starting to go up.  
 11 Q Did that have any effect on your decision making with  
 12 respect on how you traveled?  
 13 A Yes, it did. I mean, it started -- I still travelled a  
 14 lot commercial; but if there was a threat level on a particular  
 15 period, the security people would advise me to travel private.  
 16 Q And that's a decision that you believed you had  
 17 authority to make?  
 18 A Yes, based on their advice.  
 19 Q Did there come a time when you were featured in  
 20 Doonesbury?  
 21 A Yes.  
 22 Q And can you -- what can you tell us about that?  
 23 A All I can tell you is Gary Trudeau did a cartoon and  
 24 poking fun at us, and I actually thought it was pretty funny.  
 25 Q I'll direct your attention to the document that appears

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1 behind Tab 83.  
 2 Would you tell me what that is?  
 3 A That is the Doonesbury cartoon.  
 4 MR. CORRELL: Your Honor, move its admission in  
 5 evidence to show the level of national attention and  
 6 notoriety or celebrity or exposure or whatever you want to  
 7 call it Mr. LaPierre was being subjected to at this point in  
 8 time.  
 9 MR. CONLEY: Objection. Relevance, your Honor.  
 10 THE COURT: Overruled.  
 11 MR. CORRELL: Thank you, your Honor. May we  
 12 publish that?  
 13 THE COURT: What's the exhibit number?  
 14 THE TECHNICIAN: WLX 245.  
 15 MR. CORRELL: 245.  
 16 (Whereupon, at this time Exhibit WLX 245 was  
 17 admitted and received into evidence.)  
 18 (Displayed)  
 19 MR. CORRELL: Give the people a moment, see if they  
 20 think it is funny.  
 21 Q While we do that, I'm going to ask you to tell us a  
 22 little bit more about NRA programs. Was there something called  
 23 NRA Sports?  
 24 A Yes.  
 25 Q What was that?

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1 A That was a labelling of a division of the NRA where we  
 2 did all our shooting programs, our training programs, our hunter  
 3 safety programs, our hunting education programs. We decided to  
 4 brand it NRA Sports.  
 5 Q And did you marry that up with your relationship with  
 6 the NFL alumni?  
 7 A We did. We branded that up with the relationship of  
 8 the NFL alumni NRA Sports brand.  
 9 Q Would you direct your attention to the document that  
 10 appears behind Tab 84.  
 11 Do you recognize this document?  
 12 A I do.  
 13 Q What is it?  
 14 A It is, again, in conjunction with the Superbowl where  
 15 we ran the Sporting Clays Tournament for the NFL. It is the NFL  
 16 alumni with the NRA Sports brand during that, during that event.  
 17 Q And did this help you with your celebrity outreach  
 18 program?  
 19 A Yes, it definitely did. I mean, we became very close  
 20 to a lot of the NFL alumni. We formed relationships with them.  
 21 We were on stage during their dinner, which has since been  
 22 changed to NFL Honors when the NFL took it over, which they run  
 23 during the Superbowl. And we -- we ran some on the NRA ads in  
 24 programs with Karl Malone and with Steve Largent, and it was --  
 25 again, it was an integrated marketing of our brand with other

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1 brands and showcasing the mainstream of the shooting sports that  
 2 we were a big part of the mainstream of American culture which  
 3 would make people more willing to join, more willing to donate  
 4 and showcase the shooting sports and what the NRA was about.  
 5 Q Who's Karl Malone?  
 6 A Karl Malone -- well, he was a second leading scorer in  
 7 NBA history. I think LeBron James is now past him, so I think  
 8 he's the third leading scorer in NFL history -- in NBA history.  
 9 I think I said NFL. He was a proud NRA member. I formed a  
 10 relationship with him. I asked him if he would do an on the NRA  
 11 ad for us and he said he would.  
 12 He ended up running and serving on our board of  
 13 directors for years. And we ran the ad with him in virtually  
 14 all college and pro preseason football magazines to showcase the  
 15 NRA.  
 16 Q And was that a successful campaign for the NRA?  
 17 A Extremely successful.  
 18 Q Did you view that as being in the interest of the NRA  
 19 to maintain that relationship?  
 20 A Absolutely. There were one or two newscasters who were  
 21 inappropriately trying to characterize the NRA as racist even,  
 22 and which is the last thing the NRA ever was going back to its  
 23 founding, and I wanted to showcase diversity, what we were  
 24 about, and that was part of our core DNA.  
 25 MR. CORRELL: So, your Honor, I'd like to move into

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1 evidence or offer into evidence the document that appears  
 2 behind 84 just to show the part of the program, admission of  
 3 Sporting Clays with the NFL alumni. Just the cover page is  
 4 fine.  
 5 THE COURT: 2003?  
 6 MR. CORRELL: Yes, we're accelerating now. We're  
 7 approaching --  
 8 THE COURT: Not fast enough. Sustained.  
 9 Q Did you do anything with golf, the sport of golf? Did  
 10 the NRA do anything with golf?  
 11 A I don't think we did actually.  
 12 Q Would you direct your attention to the document that  
 13 appears behind Tab 85.  
 14 Do you see that document?  
 15 A I do.  
 16 Q What is it?  
 17 A The NFL Alumni Superbowl of Golf. They would have in  
 18 addition to their shooting event, they would have a golf  
 19 tournament; and NRA as part of that event had a team in that  
 20 golf tournament.  
 21 Q And are you a golfer?  
 22 A Not very good, but, yes, I've golfed. I don't play  
 23 very much.  
 24 Q And there's an allegation in this case that you belong  
 25 to a golf club. Do you remember hearing that?

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1 A That's right.

2 Q Was there any business purpose for you belonging to

3 that golf club?

4 A Yes, I could entertain donors. I could entertain folks

5 at that club.

6 Q Did there come a time when you were told that the laws

7 had changed and that the organization could no longer pay for

8 golf clubs?

9 A Yes.

10 MR. CONLEY: Objection, hearsay.

11 THE COURT: Well, it was leading, but --

12 MS. ROGERS: Object to the extent it calls for a

13 legal advice.

14 THE COURT: Well --

15 MR. CORRELL: I can do it another way, your Honor,

16 if you prefer.

17 THE COURT: Sure.

18 Q Do you still belong to the golf club?

19 A Yes, I do.

20 Q And do you pay your own dues?

21 A Yes.

22 Q And before that, did you ever charge any dues to the

23 NRA that you believed that you weren't entitled to charge to the

24 NRA?

25 A No. But when our new treasurer came in, he told me the

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1 law changed and it was not appropriate to have NRA pay any --

2 MR. CONLEY: Objection, hearsay, your Honor.

3 THE COURT: There's no question pending, so...

4 Q Did there come a time when the NRA treasurer spoke to

5 you about the issue of golf club memberships?

6 A Yes.

7 MR. CONLEY: Objection, leading.

8 THE COURT: Overruled on that. So, you're just

9 pursuing this as to what his understanding was?

10 MR. CORRELL: Correct.

11 THE COURT: Whether it is true or not is not the

12 issue. You're just saying from his personal -- this is --.

13 MR. CORRELL: I can do it even more --

14 THE COURT: Okay, I think given the relevance

15 standard, I'll let you get his state of mind based on what

16 experts or advisors told him.

17 Q Did you receive information from an officer of the NRA

18 relating to the issue of whether it was appropriate for you to

19 charge dues for your golf club to the NRA?

20 MR. CONLEY: Objection, your Honor.

21 THE COURT: Overruled.

22 A Yes.

23 Q And what was the information you received?

24 A He said that the law had changed and it was no longer

25 appropriate to charge social club dues to the organization; and

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1 if you wanted to continue that, you needed to pay -- any of

2 that, you needed to pay it on your own.

3 Q And before that, had the fact that the NRA was allowing

4 or was providing social club memberships to certain executives

5 disclosed in the 990; do you know?

6 A I'm not sure, but I think it was well-known.

7 Q Thank you. So, let's talk about country music and that

8 outreach program. The -- if you could direct your attention to

9 the document behind Tab 86.

10 Could you tell us what that is?

11 A That is another NFL Alumni Superbowl Sporting Clay

12 Event or alumni weekend where we ran the Sporting Clay

13 Tournament for the NFL alumni. We attended the events the held

14 NFL alumni, and Hank Williams, Jr., was a performer at the

15 event.

16 Q And was that part of an effort to combine your contacts

17 in the country music industry with your contacts in the NFL to

18 advance the interest of the NRA and its mission?

19 MR. CONLEY: Objection, leading.

20 Q Was the purpose of the NRA supporting this effort?

21 A Well, again, music has a tremendous influence on

22 American culture. I mean, all you have to do is look at Taylor

23 Swift right now as to what she's doing with American culture,

24 and there was a tremendous amount of people in the country music

25 community that enjoyed the shooting sports that support the 2nd

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1 Amendment and we thought that it would be in NRA's interest to

2 develop a relationship with all of them.

3 We actually developed a brand called NRA Country where

4 we started working with artists, and they started to get

5 involved with us. They started to talk about many of them first

6 learned to shoot through an NRA training program, and it was

7 just a natural combination of brands that I think furthered the

8 NRA as part of the mainstream of American culture which

9 benefitted the NRA in terms of people willing to join, people

10 willing to donate and people willing to feel proud of their

11 membership.

12 Q Please direct your attention to Tab 86, the document

13 behind it and the -- can you flip through.

14 You had mentioned Karl Malone. Do you see a photograph

15 of Karl Malone in there?

16 A I do.

17 Q Can you tell us is this the -- the part of the campaign

18 you had talked about earlier that you had arranged, that you

19 managed to get Karl Malone to do for the NRA?

20 A Yes. I mean, it's part of Karl Malone speaking out

21 about the NRA's safety, training and education and he's worked

22 with groups like 4H and Boy Scouts and American Legion and how

23 he was proud of his involvement with us. Growing up in

24 Louisiana, and Karl loved to hunt and he was proud of his

25 membership and proud of the organization.

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1 MR. CORRELL: Your Honor, I'd like to move this  
2 document into evidence.  
3 MR. CONLEY: Objection, relevance, hearsay.  
4 THE COURT: Sustained.  
5 MR. CORRELL: Your Honor, this is highly relevant.  
6 THE COURT: It is a 2007 promotion?  
7 MR. CORRELL: Yes. Your Honor, this was part of a  
8 continuing effort by Mr. LaPierre --  
9 THE COURT: Continuing into the relevant period?  
10 MR. CORRELL: Yes.  
11 THE COURT: So then do something from the relevant  
12 period.  
13 MR. CORRELL: Your Honor, I'd like to show  
14 continuity. There are allegations in the case that  
15 Mr. LaPierre was utilizing NRA funds for improper purposes,  
16 like, traveling to the Superbowls and other sporting events.  
17 This shows that this is an integral part of the  
18 NRA's effort to reach out to all communities in order to  
19 advance its mission. This is critically important evidence,  
20 and it is not prejudicial to the Government.  
21 THE COURT: I don't think it is prejudicial either,  
22 but it's just -- there's a limit to how many documents we  
23 can sort of include in the record. You could have one of  
24 these for every year. So, you're saying this is just an  
25 exemplar?

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1 MR. CORRELL: An exemplar, yes, your Honor.  
2 THE COURT: In 2007?  
3 MR. CORRELL: Yes, your Honor.  
4 THE COURT: You can have the cover page again.  
5 MR. CORRELL: May I have the photo as well?  
6 THE COURT: Sure.  
7 MR. CORRELL: Thank you, your Honor. May we  
8 publish that?  
9 THE COURT: What's the exhibit number?  
10 THE TECHNICIAN: WLX 248.  
11 MR. CORRELL: 248, your Honor.  
12 (Displayed)  
13 Q So, that's Hank Williams referred to on the front  
14 cover?  
15 A Yes.  
16 Q Can we flip over to the photograph of Karl Malone. How  
17 long did that ad campaign continue?  
18 A I think that ad campaign with Karl probably continued  
19 for about -- about ten years.  
20 Q And did it become part of the centerpiece of your  
21 outreach of -- in support of your mission?  
22 A Yes, it did. I mean, he was very proud of the NRA. I  
23 mean, he had one of his agents wasn't that crazy about him doing  
24 it; but I called Karl and he's like, "Look, I want to do it.  
25 I'm proud of this. This is part of what I'm about."

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1 Q And did he actually show up for board meetings?  
2 A He did not show up for board meetings.  
3 Q Did he show up for events like Sporting Clays or any of  
4 the other things you guys did?  
5 A He used to do that. He used to show up at hunting  
6 shows all the time, things like that.  
7 He, he would do -- I remember when Gilbert Arenas who's  
8 with the Washington Wizards did something really stupid with a  
9 firearm. He took a firearm into the locker room and that was a  
10 really negative bad thing, and I called Karl and said, Hey,  
11 look, would you go on ESPN and talk about this is not what a  
12 good, responsible American firearms owner does and please talk  
13 about that because it is being portrayed; and he said,  
14 Sure, I'll do it."  
15 Q And did he do it?  
16 A He did.  
17 THE COURT: Just, the jury, you've heard me  
18 reference relevant periods a couple of times. I don't want  
19 that shrouded as a mystery. You'll hear about it in the  
20 instructions. For some of the claims, it runs from early  
21 2014 through roughly 2022; and for other claims, it starts  
22 in early 2017 all the way through.  
23 Now, you will also hear me say that I've allowed  
24 evidence in from both before that period and after; and I'll  
25 explain to you that you can consider it if you think it is

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1 relevant to things that occurred during the period, but I  
2 didn't want you to hear relevant period and start wondering  
3 what I meant.  
4 I'll give you a lot more information about that at  
5 a later time, but that's roughly some claims 2014, some  
6 claims 2017.  
7 All right, go ahead.  
8 Q Mr. LaPierre, would you please direct your attention to  
9 a document that appears behind Tab 88.  
10 Do you recognize this document?  
11 A Yes, I do.  
12 Q What is it?  
13 A It's a letter from GQ magazine saying that I happened  
14 to be included in their article.  
15 Q And what article was that?  
16 A It was an article on the -- well, I'm reading their  
17 wording, "The 50 Most Powerful People in DC," is what it said.  
18 Q What's the date on this document?  
19 MR. CONLEY: Objection, your Honor. This is  
20 hearsay. It is not in evidence.  
21 THE COURT: He can say what the date is.  
22 A The date is --  
23 THE COURT: What tab do you want him in?  
24 MR. CORRELL: 88.  
25 THE COURT: He's not in -- yeah, it is the cover

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1 letter.

2 A Oh, August 14, 2007. Thank you.

3 Q And was this accompanied by a copy of the magazine?

4 A Yes, it was.

5 Q And who appeared on the cover of the magazine?

6 A President Obama.

7 Q Were you listed as among the 50 most powerful people in

8 DC?

9 A Yes, I was.

10 Q This is 2007. How was your risk profile in 2007?

11 A It was continuing to grow. I mean, it was continuing

12 to get the higher, I mean --

13 MR. CONLEY: Objection, foundation.

14 THE COURT: It is not quite a fact question when

15 you phrase it that way.

16 MR. CORRELL: I can rephrase, your Honor.

17 Q In 2007, what was your understanding, if any, as to the

18 circumstances that you were facing in terms of personal risk

19 because of the work you were doing as the executive vice

20 president of the NRA?

21 A The personal risk part -- and I was thankful for the

22 work in the organization that had security in the building and

23 cared about security; but the higher profile I became, I mean,

24 people have strong feelings about this issue and I think I had a

25 well-founded belief that the higher profile I became, the

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1 more -- the higher the risk profile became because there was

2 antagonism growing around this issue much more so than 15 years

3 before that.

4 Q Fair to say that you had become somewhat of a

5 lightning rod?

6 MR. CONLEY: Objection, leading.

7 THE COURT: Overruled.

8 A Yes.

9 Q Fair to say you've become somewhat of a target for

10 criticism?

11 A Yes.

12 Q Please direct your attention to the document that

13 appears behind Tab 89.

14 Do you recognize that document?

15 A I do.

16 Q What is it?

17 A It is a picture with President -- Mrs. Bush and

18 President Bush.

19 Q Did you cultivate a relationship with Barbara Bush and

20 President Bush?

21 A I did.

22 Q Why did you do that?

23 A Because it was, it was -- it was good for the National

24 Rifle Association who I worked with to have a relationship with

25 the President of the United States.

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1 MR. CORRELL: Your Honor, I would move into

2 evidence the document, the photograph that appears behind

3 the tab.

4 MR. CONLEY: Objection, relevance, your Honor.

5 THE COURT: Sustained.

6 MR. CORRELL: Your Honor, it is evidence --

7 THE COURT: Sustained.

8 Q Did you have a relationship with anyone else in the

9 Bush family?

10 A Yes, I did. The one I was actually closest to was Jeb

11 Bush.

12 Q And what was the nature of your relationship with Jeb

13 Bush?

14 A I saw him a lot more. He was very down-to-earth and

15 very nice, and I just developed a relationship with him and it

16 continued when he was governor.

17 Q Did you ever go out to the Bush family ranch?

18 A Yes, I did.

19 Q And where is that?

20 A It was in Texas.

21 Q Crawford, Texas?

22 A Yes.

23 Q How many times did you go out?

24 A I think I was there once.

25 Q Did you ever cultivate a relationship with Chuck

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1 Norris?

2 A Yes.

3 Q And just can you tell us quickly why and how?

4 A Chuck Norris used to come to some of our shooting

5 events. He had a charity called "Kick Drugs out of America,"

6 where he was trying to discourage drug usage and NRA had an

7 involvement in terms of that charity, also.

8 Q And what was the nature of the involvement?

9 A I think we attended it. We may have given a

10 contribution to the charity. Chuck Norris used to come to some

11 of our events.

12 Q Was the building of that relationship something that

13 you saw as in the best interest of the NRA?

14 A Yes. Again, I mean, he was a very identified celebrity

15 in an American culture; and as I said many times before, I mean,

16 celebrities have a big influence on American culture.

17 It would -- it would not only benefit the organization

18 with a relationship, but benefit what we stood for, the

19 shooting sports, the 2nd Amendment, the freedom to own and all

20 of that.

21 Q Did you pursue that relationship because you saw that

22 it was in your own personal interest to have a relationship with

23 Chuck Norris?

24 A No. It was in the NRA's interest.

25 Q Did you ever go out drinking with Chuck Norris?



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1 A No, I didn't.

2 Q Because you don't drink, right?

3 A I don't drink.

4 Q Please direct your attention to the document that

5 appears behind Tab 93.

6 Do you see that document?

7 A Yes, I do.

8 Q What is it?

9 A It's -- it is the NRA 500. It is a sponsorship of

10 NASCAR race that the NRA was involved with.

11 Q Is that one of the -- the date on this is 2013. Do you

12 see that?

13 A I do.

14 Q Is this one of the events that you would helicopter to

15 in order to get around the backed up traffic?

16 A Yes, it was.

17 Q Why did you do that? Why didn't you just go by car?

18 A Because cars were backed up for miles, and it would

19 take you hours to get out there at that point. I mean, NASCAR,

20 this was at the height of the NASCAR popularity; and it was just

21 the most convenient way to get there. I also at times we drove,

22 too. We didn't helicopter every time.

23 Q When you helicoptered, did you view that as an

24 appropriate expense given the time constraints and the need to

25 get in and get out safely?

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1 appears. Can you stop there.

2 Q Who's the person in the picture with Karl Malone? You

3 can look up at the screen.

4 Do you recognize that person?

5 A I don't based on the -- I don't.

6 MR. CORRELL: Okay, could you please scroll on.

7 (Scrolling)

8 Q Just stop there for a moment. Does this refresh your

9 recollection as to what you were doing at that race or at that

10 event? Is this one you attended?

11 A Yes, I attended. They would -- we would come out on

12 stage before the crowd. We would present a check to the charity

13 that the organization would do. We would invite many, many of

14 our donors to the race to come and build relationships with

15 them.

16 Governor Perry would -- came to this one, and it was

17 just a very positive thing in terms of NRA being involved in

18 the -- another example of NRA being involved in the mainstream

19 of American culture with all of these cultural activities that

20 have an impact on America.

21 Q So this was in 2013, correct?

22 A Yes.

23 Q And was this one of the circumstances that caused you

24 to start to think about whether the NRA might be better off with

25 a home in Texas?

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1 MR. CONLEY: Objection, leading.

2 THE COURT: I'll overrule this one. Go ahead.

3 A Yes, many people did get in that way. This was the one

4 where we also had Karl Malone as the -- I don't know the master

5 of ceremonies, but he dropped the green flag and did "Gentlemen

6 Start Your Engines."

7 MR. CORRELL: Your Honor, move admission of this

8 document into evidence.

9 MR. CONLEY: Objection, relevance.

10 MR. CORRELL: It is evidence of the NRA's

11 relationship with the NRA -- sorry -- with the NASCAR and

12 with the benefit to the NRA that came from Wayne's efforts

13 to get Karl Malone involved and working with the NRA on its

14 mission.

15 THE COURT: Overruled. What exhibit number?

16 THE TECHNICIAN: WLX 255.

17 THE COURT: WLX 255.

18 (Whereupon, at this time WLX 255 was admitted and

19 received into evidence.)

20 MR. CORRELL: May I publish it to the jury, your

21 Honor?

22 THE COURT: Sure.

23 (Displayed)

24 MR. CORRELL: Can we go to the first page and then

25 scroll slowly through to the pages where Karl Malone

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1 MR. CONLEY: Objection, leading.

2 THE COURT: Overruled.

3 A I don't know that this was. I mean, Texas is one of

4 our big membership states. So is New York, actually, along with

5 California; but we have a tremendous amount of our donors are in

6 Texas. I think we have 400,000 members in Texas or more, and

7 it's a very welcoming state to the NRA.

8 MR. CONLEY: Objection to a friendly environment to

9 the NRA, your Honor.

10 A It's a very friendly environment to the NRA. I mean,

11 politically it's also a friendly environment.

12 THE COURT: We're going to take our lunch break.

13 We'll reconvene at 2:15.

14 COURT OFFICER: All rise, jury exiting.

15 (Whereupon, at this time the jury then left the

16 courtroom.)

17 MR. CORRELL: Your Honor, I think that after lunch,

18 we're going to proceed with other witnesses and then we'll

19 presume with Mr. LaPierre tomorrow morning, first thing.

20 MS. CONNELL: Are we going to go with Mr. Frazer

21 and then Mr. Phillips, I'm sorry, just to confirm?

22 MS. ROGERS: We're going to go with Mr. Frazer and

23 given the ruling on the audiotape, I think we may skip --

24 we'll update you after lunch on Mr. Phillips.

25 MS. CONNELL: Can you let us know as soon as

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1 possible?

2 MS. ROGERS: Yes.

3 MS. CONNELL: And then after Phillips or no

4 Phillips, the audiotapes? I mean the depositions?

5 MS. ROGERS: Likely, yes. I'll let you know. I'll

6 confirm that after lunch.

7 MS. CONNELL: And who's calling Mr. Frazer?

8 MS. ROGERS: Mr. Frazer is calling Mr. Frazer.

9 THE COURT: All right, thank you.

10 (Whereupon, at this time a luncheon recess was then

11 taken.)

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1 other folks who I don't know who is asking questions at the

2 end of this, but I just want to flag that.

3 All right. So what's next?

4 MR. CORRELL: Your Honor taking your comments to

5 heart, I have decided not to call Mr. Graham the

6 compensation expert and that will provide some greater

7 flexibility.

8 THE COURT: Okay. So what's the next witness going

9 to be? Mr. Frazer?

10 MS. CONNELL: If I can just raise something.

11 While we were at lunch, the NRA's counsel let me

12 know that they had switched some of the witnesses around.

13 We had an objection to one of the switching. I think we

14 have reached an agreement, but I just wanted to let the

15 Court know I believe we are going to go with Mr. Frazer and

16 then perhaps Mr. Spray's videotape. And then if the Court

17 would like to begin with John Commerford, they have a

18 witness they have, and we would cross him tomorrow after Mr.

19 LaPierre, I guess.

20 MS. ROGERS: So we object to the characterization

21 of switching witnesses around. Mr. Commerford travel from

22 out of town. He was disclosed yesterday at 3:41 p.m. We

23 intended to call him after Mr. Frazer. There were some

24 additional documents that were disclosed later and as an

25 accommodation to the AG, we were willing to not use those

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1 AFTERNOON SESSION

2 \* \* \* \* \*

3 THE COURT: So I had one logistical issue to raise

4 about Mr. LaPierre's dividing up his testimony the way we

5 are doing it.

6 Given that tomorrow is scheduled to be the last day

7 for evidence to come in, we need to operate so that there is

8 a fair opportunity to do cross-examination and so that --

9 you know, we have spent this morning, and we got to 2013.

10 And so I just don't want us to end up in a situation where

11 there is not sufficient time for all the other things. I

12 don't know what you all have ready to do, but I don't want

13 to be faced with something at the end of when he can testify

14 and he hasn't had a chance to do cross, and there is no

15 other day for it to happen. Because if that happens, that's

16 a problem, and it could lead to striking of his direct.

17 MR. CORRELL: I understand, your Honor, and I'm

18 going to try to accelerate and tighten the timeframe

19 tomorrow.

20 THE COURT: And the other defendants are -- because

21 I don't know how you have all divided this up, but this

22 -- at this pace this is going to be a lot of time that's

23 left is this one witness.

24 MR. CORRELL: It will be a faster pace, your Honor.

25 THE COURT: Well, for you, but there is a lot of

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1 documents today.

2 MS. CONNELL: Your Honor, yesterday -- not to put a

3 fine point on it, but the defendants have had dozens and

4 dozens of witnesses on their list, something like 60

5 witnesses on their list. I think at one point it was up to

6 90, and we have been asking them just to let us know who is

7 coming.

8 Yesterday we were sent multiple videos. We got

9 different witnesses -- multiple emails. We got different

10 witnesses and different orders. It makes us scurry around

11 trying to prepare for them.

12 Then after asking clarification on when people

13 would be closing their cases, what witnesses would be going,

14 was there an agreed upon order, Mr. Peters sent an email to

15 the Court yesterday afternoon laying out of order, and we

16 prepared for that order which made it seem like Mr.

17 Commerford had no shot of going today.

18 At 7:10 last night we got a bunch more documents

19 from Mr. Commerford, and I will note one of the documents

20 from Mr. Commerford is a document that's hotly contested.

21 It's the December 2023 risk assignment COSO situation that

22 Ms. Rowling performed, and we had no prior notice of Mr.

23 Commerford coming until he was put on the witness list in

24 mid-December. No notice he has any connection to that.

25 We are entitled to at least 24 hours to prepare,

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1 and this is not a fair opportunity. So even as of last  
 2 night and this morning, we were left with the view that  
 3 after Mr. Frazer, Mr. Arulanandam would go, and then we  
 4 would be basically at the end of the day.  
 5 So your Honor, we would just ask that the plaintiff  
 6 not have to cross-examine Mr. Commerford today, that it's  
 7 not fair, that it's not in the spirit of the 24-hour rule.  
 8 We gave the defendants as much time as we possibly  
 9 could, often more than 24 hours. We understand everyone is  
 10 working hard, but this is too much, and we have videos ready  
 11 to go. We should begin with the video.  
 12 MS. ROGERS: Your Honor, respectfully, these are  
 13 mischaracterizations. 24 hours was given. It's more notice  
 14 than we received at many junctures during plaintiff's case.  
 15 We have multiple defendants jostling there to put  
 16 in cases in a much shorter period of time. We have already  
 17 agreed not to use any of the documents disclosed yesterday  
 18 evening which plaintiff had less than 24 hours notice, so  
 19 this hotly contested document that Ms. Connell just  
 20 described, she knew before she described it that it wasn't  
 21 on the table. It wasn't going to be used.  
 22 We should be able to present our case in the order  
 23 and the sequence that we think is best for us, and this is a  
 24 witness with two documents who was disclosed the day before.  
 25 He's is traveled from out of town. We would like to get him

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1 up and down today if we can. We may not be able to, but we  
 2 would at least like to take a shot.  
 3 THE COURT: It's a little unfortunate you all  
 4 haven't been quite as kind to each other as I would have  
 5 liked and partly I'm sure that's just because everybody is  
 6 working hard, and it's a little more chaotic on the defense  
 7 side because you are not all rowing in necessarily the same  
 8 direction. So I know this. I think by the time we get  
 9 through -- so it's Mr. Frazer and then straight into this  
 10 next guy or is it something else?  
 11 MS. ROGERS: That's the plan. And it's Mr.  
 12 Fleming's case, but I expect Mr. Frazer to be substantial,  
 13 so we would probably not get to Mr. Commerford until the  
 14 second half of the second half of the day.  
 15 THE COURT: And then may not be able to get to  
 16 cross either.  
 17 MS. ROGERS: Correct.  
 18 THE COURT: Your Honor.  
 19 MS. CONNELL: Your Honor, then it seems fair enough  
 20 to play with the deposition of Spray and he raises that  
 21 question or that problem.  
 22 THE COURT: Well, look, I'm inclined not to --  
 23 well, what I really don't want to do is spend so much time  
 24 talking about it that we can't actually do it, so I'm going  
 25 to let them proceed in the order they have. This doesn't

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1 sound like a seismic witness really.  
 2 MS. ROGERS: Not seismic. He just traveled in the  
 3 snow.  
 4 THE COURT: This is -- it is a little -- the grating  
 5 thing is having 80 people on your witness list and narrowing  
 6 them 24 hours really is not cricket in my opinion, but I'm  
 7 just, you know -- I'm not going to start shifting people  
 8 around and telling some -- who is he? Is he an employee?  
 9 MS. ROGERS: He is an NRA employee. He works under  
 10 Mr. Cox, and he remains in that deficient. Just -- we dealt  
 11 with 5,200 exhibits which is the same principle.  
 12 THE COURT: Yeah. That was the -- that was the  
 13 evil on the other side. Look, I --  
 14 MS. CONNELL: Your Honor, just --  
 15 THE COURT: I'm not going to change the order. I  
 16 -- if I get the feeling that -- so is what you're saying to  
 17 me, Ms. Connell, that now you are going to be prepared to  
 18 cross-examine this guy?  
 19 MS. CONNELL: If I just heard that the risk  
 20 assessment is out and he is not going to be questioned on  
 21 that, that makes it easier. But yes, essentially, your  
 22 Honor, we are going to be having to kind of take it with  
 23 less preparation than we had wanted to which is unfortunate  
 24 and unfair, and I just want to say, you know, we gave a list  
 25 of witnesses we intended to call in order. We tried to let

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1 them know as soon as possible if there was any change.  
 2 Often days ahead. We tried to follow that order well in  
 3 advance. And while we had 5,000 documents on a document  
 4 list, the defendants have collectively I think over 3,000,  
 5 and we have given them as much notice as possible and where  
 6 they have asked for an accommodation, we have tried to make  
 7 it.  
 8 THE COURT: My bone to pick is among the 5,000 are  
 9 a bunch of documents that you then later objected to. So  
 10 there is -- it hasn't been perfect. No trial is perfect.  
 11 Let's proceed with, you know, who you told them at  
 12 3:00 yesterday, and we will take that document out and we  
 13 will move on. So let's get the jury.  
 14 MS. ROGERS: Your Honor, to be clear, so we are  
 15 going to proceed with the documents we disclosed at  
 16 3:00 p.m. yesterday, and whatever documents she is  
 17 contesting, that was contested later is out.  
 18 MS. CONNELL: That includes the risk assessment?  
 19 MS. ROGERS: It was disclosed at three.  
 20 MS. CONNELL: 3:41 p.m.  
 21 THE COURT: I'm going to let them call the witness.  
 22 MS. ROGERS: Thank you, your Honor.  
 23 (Whereupon, at this time the jury entered the  
 24 courtroom.)  
 25 THE COURT: Please have a seat. As we have done a

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1 couple of times, Mr. LaPierre is going to come back and  
 2 finish his testimony in the morning as an accommodation.  
 3 And so the next witness is going to be who for the  
 4 defense?  
 5 MR. FLEMING: I call Mr. Frazer.  
 6 JOHN FRAZER, a witness called on behalf of  
 7 the Defendant, after having been first duly sworn, took the  
 8 witness stand and testified as follows:  
 9 THE CLERK: State your name.  
 10 THE WITNESS: John Frazer.  
 11 THE CLERK: Thank you. You may be seated.  
 12 THE COURT: Good afternoon.  
 13 DIRECT EXAMINATION  
 14 BY MR. FLEMING:  
 15 Q Good afternoon, Mr. Frazer.  
 16 A Good afternoon.  
 17 Q So it's February, and we have never gotten a chance to  
 18 meet you.  
 19 So where do you live currently?  
 20 A I live in Virginia.  
 21 Q And who do you live with?  
 22 A My wife and kids.  
 23 Q Where did you -- where were you born?  
 24 A In Manhattan.  
 25 Q And did you grow up in Manhattan?

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1 A I did.  
 2 Q For how long?  
 3 A 17 years till I went away to college.  
 4 Q Until college?  
 5 A Right.  
 6 Q Can you just take us briefly through your education  
 7 starting with actually out of curiosity where you were educated  
 8 in Manhattan?  
 9 A Sure. So I went to a couple of the local public  
 10 schools. I grew up on the Lower East Side right off the FDR  
 11 Drive, grew up, went to a couple of the local public schools.  
 12 They have been renumbered, at least one of them, and then went  
 13 to Hunter College High School. That's when I used to take --  
 14 change buses out here on the corner. And then I went to Bowdoin  
 15 College and on to graduate school.  
 16 Q Did you happen to coincide with Lin-Manuel Miranda when  
 17 you were at Hunter?  
 18 A I was after Justice Kagan and before Lin-Manuel.  
 19 Q Too bad.  
 20 So after college, can you take us through your work  
 21 history before you began working at the NRA?  
 22 A Sure. So after college, my initial plan coincidence  
 23 like Mr. LaPierre, I was going to be a political science  
 24 professor. So I went to the University of Virginia graduate  
 25 program. I got a master degree, left there, decided that the

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1 academic research wasn't really my thing. I spent about two and  
 2 a half years working for remodeling companies mostly in Northern  
 3 Virginia, briefly in Oregon. That was kind of a formative  
 4 experience because I got to know a lot of experience that hadn't  
 5 been in the graduate school public, a lot of NRA members, and  
 6 that kind of set me on that path and eventually answered an ad  
 7 in the Washington Post.  
 8 Q Well, before you get there, can you just describe what  
 9 remodeling is?  
 10 A We did kitchens, bathrooms, additions, basically.  
 11 Q So you developed skills at being handy?  
 12 A I. Was a carpenter's helper. Yes, I still have my  
 13 tools.  
 14 Q Now, we have heard a lot or at least some about your  
 15 history -- early history first 20 years at ILA; right?  
 16 A Yes.  
 17 Q Okay. I would like to just have you explain just  
 18 aspects of that portion of your career and that is how you came  
 19 to go to law school.  
 20 A Sure. So after working in an entry-level job and then  
 21 kind of working my way up in a couple of different roles, I was  
 22 working in the Federal Affairs Division on Capitol Hill and  
 23 doing a lot of legislative drafting and analysis and obviously  
 24 advocacy. That was the job. And one can day while I was -- I  
 25 was walking with the Executive Director of ILA at the time and a

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1 man named James Baker, we were walking back from a meeting on  
 2 Capitol Hill, and he -- and he said, you ought to go to law  
 3 school. You're actually better at it than most of these lawyers  
 4 we just met with. So I took that as a compliment, but it took  
 5 me a couple of years to really -- for it to really sink in, and  
 6 I started law school in Fall of 2004.  
 7 Q And did the NRA pay some portion of that?  
 8 A The NRA is a tuition-reimbursement program. There is  
 9 an IRS limit on it, but it covered about half of my tuition.  
 10 Q Did you go to law school during the day or night?  
 11 A I went to a night program at George Mason in Virginia.  
 12 Q How long did it take to go graduate from a night law  
 13 program?  
 14 A Four years.  
 15 Q During that four-year period, did you continue working?  
 16 A I did.  
 17 Q Where were you working?  
 18 A I was by that time -- well, first semester, I was still  
 19 at Federal Affairs, the end of the first semester. So beginning  
 20 of '05 roughly, Chris Cox had asked me to come back in a  
 21 management role at headquarters. I was the deputy director of  
 22 the research and information division. And about halfway  
 23 through law school, the director retired, and I became -- I was  
 24 promoted to be director.  
 25 Q Did any other important event of your life happen

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1 during this period of time that you were in law school and  
 2 dealing with the new job?  
 3 A I got married.  
 4 Q Okay. So I'd like to now turn from your personal  
 5 history. Well, let me ask you. So can you take the jury  
 6 briefly through leaving the NRA and then coming back?  
 7 A Sure. So in end of 2012, early 2013, a former NRA  
 8 lawyer who had gone into pretty successful private practice was  
 9 appointed as a judge -- state judge in Fairfax, Virginia where  
 10 NRA headquarters is, and that opened up spaces in an  
 11 office-sharing arrangement with a couple of people who were  
 12 practicing if the Second Amendment and Firearms Law field, and  
 13 an opportunity to pick up some of the now Judge Gardner's  
 14 clients potentially. So it was kind of a once in a lifetime  
 15 opportunity. I decided to take it.  
 16 Q So before you move on, before you left for private  
 17 practice, were you offered any incentive to stay at ILA?  
 18 A Sure. Yeah, I met with Chris Cox and told him my  
 19 decision, and he said, give me a couple of weeks to try to  
 20 change your mind, and I met with him and his deputy, a man named  
 21 David Layman, and couple of weeks later, I came back and they  
 22 offered me about a 30 percent raise and a promotion title was I  
 23 think Director of Legal Affairs.  
 24 Q Had that position or that title existed before that  
 25 moment?

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1 A No. It would have been a newly-created position.  
 2 Q All right. So back to private practice.  
 3 Did there come a time when you left private practice?  
 4 And if so, why?  
 5 A There was. The -- you know, I had a great time  
 6 representing my clients. I liked my client. I enjoyed the  
 7 experience, but Jim Porter was the president of the NRA at the  
 8 time, and as you heard previously, he asked me to consider  
 9 running for secretary of the association when Major Land  
 10 announced that he would be retiring.  
 11 Q Okay. And at or about that time, can you tell us were  
 12 you approached about another position as well?  
 13 A Sure. So in the initial conversation with Mr. Porter  
 14 in late Summer of 2015 or -- 2014 -- excuse me, he -- you know,  
 15 he is a long-time attorney, and he noted that in the corporate  
 16 world, it's pretty common for the general counsel of an  
 17 organization to also be the corporate secretary or vise versa  
 18 which wasn't something the NRA had had, but it was something  
 19 that was apparently being considered. And as the discussions  
 20 continued, and I met -- I talked with Mr. Phillips at one point  
 21 and with Mr. LaPierre on a couple of occasions, the idea came  
 22 about that I would be hired initially as general counsel and  
 23 then later elected secretary.  
 24 Q And that's what happened?  
 25 A That's exactly what happened.

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1 Q All right. So we have covered a lot of territory with  
 2 you after plaintiff called you. So I'm going to address certain  
 3 discrete topics.  
 4 Do you recall that the NRA entered into an agreement  
 5 subsequently with the Allegiance Creative Group?  
 6 A I do.  
 7 Q What precipitated the renegotiation of that contract?  
 8 A What precipitated the renegotiation of the contract was  
 9 that it was going to expire, and we took that as an opportunity  
 10 to also address other issues that surrounded that, like the fact  
 11 that there had been contracts with three different business  
 12 entities, MMP, Allegiance and Concord Social was the third. And  
 13 to also get a substantial decrease in the overall fees.  
 14 Q Okay. Who negotiated that contract?  
 15 A It was an arm's-length negotiation so a little bit of a  
 16 legal term, but it was a negotiation between our outside lawyers  
 17 and their outside lawyers primarily with some involvement by NRA  
 18 staff and presumably staff on their end, but I don't know that.  
 19 Q And can you place the timeframe when those negotiations  
 20 occurred?  
 21 A It was really throughout the Summer of 2022, Spring and  
 22 Summer, I would say.  
 23 Q Now, do you recall testimony from Ms. Rowling in this  
 24 case that Mr. LaPierre was walled off from those negotiations?  
 25 A I do.

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1 Q To your knowledge, was he in fact walled off?  
 2 A Yes.  
 3 MS. STERN: Objection, your Honor. Lack of  
 4 foundation.  
 5 Q I'm going to get to that?  
 6 MS. STERN: Well, he previously testified that it  
 7 was handled by outside counsel.  
 8 MR. FLEMING: I asked him -- well, your Honor, I  
 9 asked him to his knowledge was Mr. LaPierre walled off.  
 10 THE COURT: Well, maybe you can ask the fact  
 11 questions building up to that and we can see whether it's  
 12 his knowledge or hearsay.  
 13 MR. FLEMING: Okay.  
 14 Q What's the basis of that knowledge?  
 15 A Yeah. So there was a widespread understanding in the  
 16 executive -- among the executives who were involved in that that  
 17 Mr. LaPierre because of all of the allegations in this case, in  
 18 particular, about his relationship with the McKenzies, that he  
 19 shouldn't be involved in this transaction or this negotiation.  
 20 And from my observation, he wasn't.  
 21 Occasionally, I would be in his office meeting with him  
 22 about, you know, some other issue, and he would say, how are  
 23 things going on the MMP negotiations. And I would give him very  
 24 limited answers like it's still going or still -- they are still  
 25 talking. You know, they are meeting Tuesday. That kind of

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1 thing.

2 MR. FLEMING: Okay. So can we call up PX 2426 which

3 is at Tab 20 in your binder, and this is in evidence so the

4 jury can see it.

5 Q So Mr. Frazer, do you see PX 2426?

6 A I do.

7 Q My question to you is why is Mr. LaPierre named as the

8 responsible officer at the top?

9 A I think the reason for that is that -- is that this

10 sheet -- on the sheet you need to list a responsible --

11 MS. STERN: Objection, your Honor. Lack of

12 foundation again.

13 THE COURT: Yeah. It's -- you have to kind of

14 figure out why he -- did he put his name on there or have --

15 you know, that kind of foundation to be helpful.

16 Q Well, Mr. Frazer, do you have an understanding of why

17 he is on there?

18 A I can speak to our general understanding and practice

19 of filling out these forms after doing a bunch of them.

20 Q Please do.

21 A You know, calls for listing a responsible officer. So

22 generally, the practice is to list an NRA officer within whose

23 chain of command this contract would fall. So the membership

24 division reports directly to Mr. LaPierre. So Mr. LaPierre

25 would be the responsible officer that falls under;

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1 Q And do you recall testimony about invoices and owners

2 of invoices?

3 A I do.

4 Q Okay. Would that responsible officer fit into that

5 owner concept?

6 A Yeah. I mean, it could be or it could be the

7 membership division, for example.

8 Q Okay. We can take that down.

9 So Mr. Frazer, can you describe what role your general

10 counsel's office plays in the review and/or authorization of the

11 NRA's contracts?

12 A Sure. So basically, we are supposed to review any

13 contract that any division of the NRA enters into, and it can be

14 anything from, you know, a multi-million dollar membership or

15 fundraising solicitation type of contract like you just saw to

16 a, you know, motor scooters at our show. That was one of the

17 first ones I saw when I came back on board.

18 Q So what generally do you look for and do when contracts

19 come to your office for review?

20 A Basically, my office manager functions as a traffic cop

21 for them, basically making sure that everything that comes in

22 gets referred to an appropriate attorney for review and

23 shepherding through the process and making sure that it's

24 tracked.

25 Q How many attorneys are in the general counsel's office?

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1 A Five currently I believe.

2 Q All right. Now is the role that you just described

3 different for contracts that are in excess of \$100,000?

4 A No. It can be big or small. They are all supposed to

5 be reviewed and the process is basically the same.

6 Q Okay. And when you review a contract, do you

7 personally do anything different if it's over \$100,000?

8 A I'm usually -- you know, I'm usually more likely to be

9 looking at the bigger ones, but if I happen to look at a smaller

10 one, it's not really different. It's just -- it may require a

11 little closer attention because it's typically going to be for a

12 more sophisticated services or higher risk involved, but we are

13 going to look at things like whether the -- whether -- making

14 sure that the NRA interests are protected in whatever way is

15 relevant to the contract.

16 Q So you divided up in the general counsel's office the

17 review of contracts equally among you and your staff or is it

18 different?

19 A It's primarily the staff because, I'm managing and

20 delegating, but the -- but -- and staff handles things according

21 to their areas of expertise.

22 Some people have more experience with financial

23 transactions. Some people have more experience with

24 intellectual property, copyright and trademark issues.

25 Q How experienced is your staff in the OGC?

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1 A I tried to add it up from memory, and at the time that

2 I came in, I had -- on the staff I think I had about 85 years

3 worth of total experience not counting myself and not counting

4 our former general counsel Bob Dowlut who had retired, but he

5 was still on retainer. He had 35 plus years of experience.

6 Q And can you describe what that arrangement was with Mr.

7 Dowlut?

8 A When he retired at the end of 2014, he got an annual

9 retainer contract with the NRA which I think he made pretty full

10 use of with a lot of significant projects.

11 Q And did he help you early on in 2015 with anything in

12 particular?

13 A Sure. He helped me really from day one, but he -- but

14 in -- in early to mid-2015 he started working on projects to

15 help address some recent changes in New York Law.

16 Q And we talked about that earlier with respect to the

17 conflict of interest policy.

18 A That was one significant project he worked on.

19 Q Okay. Now, when you started in 2015 as general

20 counsel, did you rely on the experience of your staff?

21 A Oh, absolutely.

22 Q So let's discuss payment of invoices. There's been

23 some -- a lot of testimony on this, and I just want to be as

24 clear as we can.

25 A Sure.

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1 Q So you heard Mr. Erstling describe the process?  
 2 A I did.  
 3 Q All right. In your words, tell us what you understand  
 4 the process to be?  
 5 A Sure. So not surprisingly, given his job, Mr. Erstling  
 6 and the fact that he is a really diligent guy, Mr. Erstling gave  
 7 an excellent description of how the invoice approval process  
 8 works right now, but the mechanics have been and the substance  
 9 is the same in terms of who receives invoices and what their  
 10 responsibilities are. The mechanics have been -- have changed a  
 11 lot.  
 12 Pre-Covid, they were piles of paper. And one of the  
 13 accounts payable accountants would come to my office with his  
 14 blue plastic folder. I still remember it. And it would have  
 15 a -- like a couple of inch stack of invoices and supporting  
 16 documents, and they would be -- there could be typically two  
 17 rubber stamps on them. One would say, and I think you have seen  
 18 these on a couple of exhibits. One would say "goods and have  
 19 been received," and that would be signed by the person who -- we  
 20 use the term contract owner. That would be signed by somebody  
 21 who actually has the responsibility of using the goods or  
 22 services or who is involved in the dealings directly with the  
 23 vendor.  
 24 And then the second stamp would have two lines and  
 25 that's for approval by two officers. If it's a contract over

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1 50 -- not a contract. Excuse me. An invoice for payment of  
 2 over 50,000.  
 3 (Continued on the following page.)  
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1 Q Okay, and if there was an invoice for less than 50,  
 2 would it have those two officers' signature lines?  
 3 A No, no.  
 4 Q Now, do invoices generally come to you for approval  
 5 ever?  
 6 A Invoices for services that are contracted through the  
 7 office of General Counsel or the secretary's office. So, for  
 8 example, if there's an invoice for a hotel bill for a board  
 9 meeting that falls under the secretary's office and I would see  
 10 that anyway.  
 11 Legal bills for law firms that are used by the office  
 12 of General Counsel would come to me whether they're for 500  
 13 bucks or 5,000 bucks or 500,000 bucks.  
 14 Q And is it fair to say that those invoices that you just  
 15 described are the invoices where your office is the owner of  
 16 them?  
 17 A Yes.  
 18 Q Do any other invoices come to you?  
 19 A Yeah, the other ones that come to me are the ones that  
 20 come to us under that financial control policy requiring two  
 21 officers' signatures for an invoice over 50,000.  
 22 Q And are those --  
 23 A Excuse me -- yeah, I'm sorry, invoice. I wanted to  
 24 make sure I didn't say contract.  
 25 Q Are those invoices for which your office is the owner?

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1 A No, most of them aren't.  
 2 Q Well, if one of them was and it was over 50,000 and it  
 3 originated in the General Counsel's office, let's say, would you  
 4 sign it twice both as owner and officer?  
 5 A No, I think the original signature would be enough.  
 6 Q So, I want to talk about the second category where it  
 7 comes to you for officer signature where you're not the owner.  
 8 What, if anything, do you do to satisfy yourself that  
 9 it is appropriate to approve payment?  
 10 A Sure. I look at the invoice. I make sure I have some  
 11 understanding of what the -- who the vendor is and what the  
 12 nature of the goods or services are and look at -- and then make  
 13 sure that it has all the necessary approvals; and if it doesn't  
 14 on the face appear strange or unusual, I'll sign off on it.  
 15 Q Now, if it does not have all the signoffs, what do you  
 16 do?  
 17 A If it doesn't have all the signoffs, I would send it  
 18 back.  
 19 Q If it has all the signoffs, is that an automatic for  
 20 you that you would sign it as an officer?  
 21 A No. I would still ask questions if I thought there was  
 22 something that needed to be asked about.  
 23 Q Can you give the jury an example of one where there is  
 24 nothing odd about it and another where there might be something  
 25 odd about it?

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1 A Sure. I'll give you an example of one I looked at  
2 yesterday, just to show you the routine type of practice.  
3 While I was on the train up here I logged on to the  
4 invoice approval system, PN 3 that Mr. Erstling mentioned. And  
5 I think the first invoice in the list in my inbox there was for  
6 printing of books. There were student handbooks for the basic  
7 pistol class. It is their most popular class in education and  
8 training division. Every student gets a helpful book that  
9 covers all the basics of pistol safety and shooting and so on.  
10 And from time to time, we need to restock the  
11 inventory, so we ordered 14,000 books and it was about \$99,000  
12 so it is in the over-50 category and it comes to me.  
13 As I looked at the routing information. I see that it  
14 has a signoff from a -- actually, it has a note attached in the  
15 system from a purchasing assistant who's verified that the  
16 shipment was actually received at the warehouse. And then it  
17 goes to the director of the purchasing division, Lisa George,  
18 and she signed off on it. And I can't remember if that went to  
19 Ms. Rowling first or me first. We're usually the two doing the  
20 signoffs.  
21 But, in any event, I've got an invoice. The purchasing  
22 division is responsible for buying the books. It said that the  
23 books have been received, and so I signed off on it.  
24 Q When you say Ms. Rowling and you usually are the two,  
25 you're talking about the two officer signoffs?

1 terms.  
2 Q And when you saw that say Mr. Tedrick had signed, did  
3 that give you assurance this was okay for approval?  
4 A It did. Because I had an understanding that that was a  
5 task that had been delegated by Mr. Phillips. Similarly, if  
6 Ms. Supernaugh signed off, she would usually write something  
7 like "LS per tel-con with WHP."  
8 So it's indicating she had talked with Mr. Phillips.  
9 Q So, I'd like to switch topics and talk about  
10 related-party transactions.  
11 Is there a committee at the NRA that is authorized to  
12 approve related-party transactions?  
13 A Yes.  
14 Q What committee is that?  
15 A The Audit Committee.  
16 Q When did that happen?  
17 A In January -- in January 2016 when the new  
18 conflict-of-interest policy was adopted.  
19 Q Is that this conflict-of-interest policy we spent time  
20 talking about in this case?  
21 A Yes.  
22 Q That you and Mr. Galla put together?  
23 A Correct.  
24 Q How -- so, can you describe how that document is  
25 authorized by the Audit Committee?

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1 A Correct, correct.  
2 Q Because it is greater than 50,000?  
3 A Correct.  
4 Q We've seen invoices in this case that relate to  
5 Ackerman McQueen out-of-pocket invoices or OOP invoices. Do you  
6 see that?  
7 A I do.  
8 Q Did it ever happen that an Ackerman OOP invoice came to  
9 you for officer approval?  
10 A Probably.  
11 Q Let me ask you a preliminary question. Were you ever  
12 the owner of an Ackerman OOP invoice?  
13 A No.  
14 Q Who's the owner of the Ackerman OOP invoices?  
15 A When I saw these come through -- and, remember, the  
16 Ackerman relationship dissolved before we had any electronic  
17 approval system. So those were coming through in usually a  
18 stack of other Ackerman invoices, but they would typically be  
19 signed off on by either Woody Phillips -- I'm sorry -- on the  
20 goods and services have been received section, they have been  
21 signed off either by Woody Phillips or by one of the staff on  
22 his behalf.  
23 Q And is that because the treasurer department was the  
24 owner of that relationship?  
25 A They were the business liaison with Ackerman in those

1 A I don't have it right in front of me at this moment;  
2 but, basically, it says that substantial -- the related-party  
3 transactions are conflict-of-interest transactions that should  
4 be reviewed by the Committee.  
5 Q Well, let's turn to Tab 21, PX 421, which is in  
6 evidence, and if we could turn to page 26 of 300.  
7 A Okay. I'm there.  
8 Q Okay. So, could you describe in response to my last  
9 question of how it happened that the Audit Committee became  
10 authorized to address related-party transactions?  
11 A Yeah, so our understanding after reviewing New York law  
12 as we worked through this policy was that this was a function  
13 that could be delegated to a committee, and so it was delegated  
14 to a committee.  
15 And, and as the policy indicates material facts about  
16 conflict of interest need to be disclosed to the Audit  
17 Committee, it is in the middle of the page. And then at the  
18 bottom of the page it notes that the -- and goes into some  
19 further detail about the mechanics of that disclosure on the  
20 disclosure form that we talked about, and then at the bottom of  
21 the page it says "Audit Committee will review the transactions  
22 and determine whether to approve or ratify them."  
23 Q Okay. And this policy was adopted when by the board?  
24 A January 2016.  
25 Q And since January 2016, has, to your knowledge, the



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1 board and the NRA as a whole followed the procedures set forth  
 2 in this policy?  
 3 A Yes.  
 4 Q So after this -- the passage or the adoption by the  
 5 board of this policy, did you take any steps to get the Audit  
 6 Committee to consider related-party transactions?  
 7 A I did. At the first audit since this was adopted in  
 8 January '16, the first Audit Committee after that the March 2016  
 9 meeting, I discussed with the committee about how setting up a  
 10 framework for reviewing these transactions and how to handle  
 11 certain types of issues.  
 12 Q And do you remember when that Audit Committee meeting  
 13 occurred?  
 14 A That was the March 2016 meeting.  
 15 Q And do you recall what the Audit Committee did at that  
 16 meeting?  
 17 A Well, I remember there was specifically discussion  
 18 that's mentioned in the committee report I think about how to  
 19 deal with something that we -- a little bit off beat that we had  
 20 fairly often, which kind of two categories:  
 21 One were transactions where the NRA pays a director in  
 22 the ordinary course of NRA business to -- at a very small  
 23 amount, like, you know some of our directors not surprisingly  
 24 have a lot of experience in competitive shooting and so go to  
 25 our rifle and pistol matches and referee matches for -- I don't

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1 Committee doesn't need to look at certain types of transactions  
 2 and then it lists some of those types. One of them is de  
 3 minimis transactions, I think that's a term that was used in the  
 4 opening arguments.  
 5 Q Let me stop you. These are the minimal payments you  
 6 just talked about?  
 7 A Right, the ones I just talked about would be an  
 8 example, yeah.  
 9 The second is these transactions or activities  
 10 undertaken in the ordinary course of business, and that's kind  
 11 of a flexible category; but, basically, saying that if staff  
 12 would normally hire something to be done, they -- that there's  
 13 not necessarily an obstacle to having a board member do it.  
 14 Q Let me stop you there. So, we've seen transactions in  
 15 quotes with rifle and pistol associations.  
 16 Do you recall those?  
 17 A Yes.  
 18 Q Is that an example of ordinary course type of  
 19 transaction?  
 20 A It could be. I mean, the NRA, historically, has given  
 21 what are called state assistance grants to state -- affiliated  
 22 organizations in states to help carry out the mission.  
 23 Q And where the Audit Committee considers and evaluates  
 24 and either approves or disapproves of a transaction with, for  
 25 instance, a state rifle and pistol association, is that

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1 know -- 15, 20 bucks an hour and for a few days. They're hired  
 2 on the same terms as anyone else, and that's kind of minimal.  
 3 And then the other category we have, which I don't  
 4 really see that much in other nonprofits, but I hear about is  
 5 situations where the board members are paying us. And that's,  
 6 that happens because we have -- we, historically, have had some  
 7 board members who are in the firearms or ammunition or outdoors  
 8 industry who want to exhibit their products at annual meetings  
 9 so they're buying booth space or they want to advertise in our  
 10 magazines so they buying ads. So, they're paying us and they're  
 11 paying the same rate as anyone else would. So, the committee  
 12 said it's not a conflict, that it's helping the association.  
 13 Q The two examples you just gave, are those exceptions to  
 14 the what qualifies for related-party transactions?  
 15 A Yeah, they are -- I believe that they are.  
 16 Q Can you go to your binder and point to the jury by  
 17 section where, if at all, those are discussed, those exceptions?  
 18 A Sure. I would point to page 27 of 300, and it is right  
 19 in the middle of the page.  
 20 Q The paragraph beginning "Approval is usually?"  
 21 A Correct.  
 22 MR. FLEMING: Can we highlight that paragraph.  
 23 Q Can you just describe, you know, briefly for the jury  
 24 what this paragraph is talking about?  
 25 A Sure. So, what it is saying is that the Audit

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1 necessarily an indication that it's a related-party transaction?  
 2 A Not necessarily.  
 3 Q So why would the Audit Committee do that?  
 4 A Just out of an abundance of caution in a lot of cases.  
 5 Q Okay, so I interrupted you. Can you continue to take  
 6 the jury through this.  
 7 A Sure. So, class C is benefits provided to a related  
 8 party solely as a member of a class that the NRA intends to  
 9 benefit as part of the accomplishment of its mission.  
 10 So to put it in shorter terms, we call that the class  
 11 of beneficiaries exception. What that means is, for example,  
 12 I'm a member of a gun club in northern Virginia. It's got  
 13 shooting ranges and fishing ponds and stuff like that.  
 14 And I go -- when I go there, there is a banner up that  
 15 says that the chapter has received grants from the NRA  
 16 Foundation. So, it is a related organization so it falls under  
 17 the Audit Committee policy. It just happens that an NRA officer  
 18 and probably a bunch of employees are all members there, but  
 19 that doesn't mean that the club got a special deal because  
 20 the Foundation gives thousands of these grants all over the  
 21 country.  
 22 Q Okay. And are (d) and (e) sort of related exceptions?  
 23 A They are. I would call them actually kind of --  
 24 they're similar to the ordinary course of business exception.  
 25 So, (d) is transactions related to compensation of

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1 employees or reimbursement of expenses.  
 2 So, if a board member drives to a board meeting and  
 3 puts in an expense report for mileage and meals, and, you know,  
 4 other check baggage fees and other routine stuff, that's not a  
 5 conflict of interest. That doesn't need to go to the Audit  
 6 Committee. It's just a normal practice.  
 7 Q So --  
 8 A And then the last one is officer compensation because  
 9 approval of compensation of the elected officer is covered in  
 10 the Bylaws, which are higher level than this.  
 11 Q Okay. And all of this was a detour from your  
 12 discussion about the March Audit Committee meeting, so I'd like  
 13 to direct your attention back to there.  
 14 You were describing what had happened at that meeting?  
 15 A I did.  
 16 Q Can you continue with that.  
 17 A So, we discussed some of the de minimis and ordinary  
 18 course type of activities and non-conflict activities, but then  
 19 we -- and then we, also, discussed the need to do a more  
 20 comprehensive review, gather information on more significant  
 21 transactions that were out there and do a comprehensive look at  
 22 them later in the year.  
 23 Q So, I'd like to show you tab 17 in your binder, PX 2586  
 24 in evidence so the jury can see it.  
 25 (Displayed)

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1 Q Mr. Frazer, I'm going to direct your attention to the  
 2 final two pages of this exhibit.  
 3 A Okay.  
 4 Q Do you recall what the final two pages reflect?  
 5 A Yeah, this is -- this is an attachment as part of the  
 6 minutes that reflects the board -- excuse me -- the Audit  
 7 Committee's September 2016 consideration of related-party  
 8 transactions.  
 9 Q And were you present for that meeting?  
 10 A I was.  
 11 Q What, if anything, did you do at that meeting?  
 12 A I had prepared -- I had prepared a version of this, of  
 13 this attachment to guide the discussion; and I just went through  
 14 it, and the committee discussed each of the -- each of the  
 15 individuals or transactions on the list and at the end voted  
 16 that they were fair, reasonable and in the best interest of the  
 17 NRA.  
 18 Q So, let me ask you specifically about three of them.  
 19 Did the transactions considered include those -- well,  
 20 withdrawn.  
 21 Did the transactions not only considered, but approved  
 22 include those for Dave Butz, Sandra Froman and Marion Hammer in  
 23 September of 2016?  
 24 A Yes.  
 25 Q Now, what did the Audit Committee do with respect to

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1 those three transactions?  
 2 A Yeah, so all three -- what all three of them had in  
 3 common was that they all had been -- these relationships with  
 4 these board members had all been in place for a number of years.  
 5 So, they -- to my recollection, all predated the change in New  
 6 York law in -- that took effect in 2014.  
 7 And, so, the -- so to my mind, there wasn't a problem  
 8 with them having existed before; and what the committee was  
 9 doing was ratifying what had happened in the past and then  
 10 approving them to go forward in the future.  
 11 Q When you say "ratify," explain what you mean?  
 12 A Ratification is a legal term for approval after the  
 13 fact.  
 14 Q Okay. And your understanding was -- well, withdrawn.  
 15 Was your intent -- your intent that the Audit Committee  
 16 not only ratify, but approve in advance, as you just said?  
 17 A Yes.  
 18 Q Now, do you have any understanding of when Mr. Butz's  
 19 arrangement had originated?  
 20 A At least 2008, I think.  
 21 Q Okay.  
 22 A I may be wrong.  
 23 Q How about Ms. Froman and then same question for  
 24 Ms. Hammer?  
 25 A Ms. Froman, I think a little earlier; and Ms. Hammer,

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1 for Unified Sportsmen of Florida at least, much earlier.  
 2 Q And all that predated the revitalization law in 2014?  
 3 A To the best of my recollection, yes.  
 4 Q So, we could take that down, and I would direct your  
 5 attention to Tab 6 in your binder.  
 6 MR. FLEMING: This is for identification, so the  
 7 jury should not see this.  
 8 THE COURT: You're just going to use the binder for  
 9 this one?  
 10 MR. FLEMING: Yes, good idea.  
 11 THE COURT: As long as the other lawyers have it.  
 12 I don't know if they have a binder?  
 13 MS. STERN: I do. Sorry?  
 14 MR. FLEMING: You have a binder?  
 15 MS. STERN: Yes, I have a binder.  
 16 Q So, Mr. Frazer, do you recognize the document that's  
 17 been marked for identification as JFX 66A?  
 18 A I do.  
 19 Q What is it?  
 20 A It is the minutes of the December 7, 2017, Audit  
 21 Committee meeting.  
 22 Q And were you present for this meeting?  
 23 A I was.  
 24 Q Did you make any presentation at this meeting?  
 25 A I did.

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1 Q Have you seen this document before?

2 A I have.

3 Q Was it -- to your knowledge, was it created at or about

4 the time of that meeting?

5 A Yes.

6 Q Was it the ordinary practice of the NRA's audit

7 secretary to make minutes of this sort?

8 A Yes.

9 Q And are these minutes kept in the ordinary course of

10 business at the NRA?

11 A Yes.

12 MR. FLEMING: I move its admission, your Honor.

13 MS. STERN: Objection, your Honor. He hasn't

14 established who created this document. His questions were

15 in broad generalities.

16 MR. FLEMING: It's a business record.

17 THE COURT: All right, is your argument that as

18 General Counsel he's not in a position to know the ordinary

19 course of business in creating these records?

20 MS. STERN: He did not establish that -- I'm sorry.

21 He did not establish what the ordinary course of

22 business was in creating records at this period of time, and

23 there's been a fair amount of testimony in this case and an

24 awful lot of documents, different versions of the same types

25 of documents and so it is quite unclear.

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1 THE COURT: Well, look, since he didn't sign this

2 one, I mean, can you establish whether he has enough

3 involvement in this particular process given his job that he

4 can testify as to how these were created?

5 MR. FLEMING: I can, very similar to the other

6 document we talked about, but...

7 Q Mr. Frazer, do you know how this document came to be

8 created?

9 A Sure. Like the September -- it was very similar to the

10 September 2016 minutes. The format is a little bit different;

11 but, basically, I helped Mr. Tedrick write the section on

12 related-party transactions, and then he, I believe, inserted it

13 into a standard format of meeting minutes.

14 Q And did he, to your understanding, edit the document if

15 at all based on what happened at the meeting, or did you help

16 him write it after the meeting?

17 MS. STERN: Objection, compound.

18 MR. FLEMING: I'll ask it different.

19 Q When you testified that you helped Mr. Tedrick write

20 this, did you help him write it before or after the December 7th

21 meeting?

22 A I don't remember if it was before or after. I may have

23 had some of the material about the related-party transactions in

24 advance.

25 Q And did you have discussions with Mr. Tedrick about its

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1 contents at anytime?

2 A I did.

3 Q And did you have discussions with him prior to him

4 signing it?

5 A Yes.

6 THE COURT: I'll admit it. I think he's in a

7 position based on prior testimony to be able to testify as

8 to how these kinds of records are made and created.

9 It is admitted as JFX 66A.

10 (Whereupon, at this time Exhibit JFX 66A was

11 admitted and received into evidence.)

12 MR. FLEMING: We can publish it.

13 (Displayed)

14 Q So, Mr. Frazer, first question I have for you is were

15 the transactions reflected in JFX 66A in fact addressed by the

16 Audit Committee at the December 7, 2017, meeting?

17 THE COURT: Based on his attendance.

18 MR. FLEMING: Based on his attendance independent

19 of the document, except to the extent reflects the

20 transactions recorded.

21 A Yes.

22 Q And that's based on your personal knowledge and

23 recollection; right?

24 A Correct, yes.

25 Q And now do you see the entry for David Keene?

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1 A I do.

2 Q Who is David Keene?

3 A David Keene then and now is an NRA board member and

4 past president.

5 Q And what happened at the December 7, 2017, Audit

6 Committee meeting with respect to Mr. Keene?

7 A So, at some point before this meeting, I became aware

8 that Mr. Keene had been paid \$4,000 a month in support of these

9 speaking engagements, which I think we heard testimony about

10 before and -- and the, you know, gathered information about that

11 and discussed it with the committee and the committee asked what

12 I took to be intended as an approval -- as a ratification of

13 the -- this had been going on since March so it was, you know,

14 roughly eight months worth of transactions, and then approval of

15 it to continue.

16 Q Now, when was it disclosed to you that Mr. Keene had

17 this arrangement?

18 A I don't remember the exact date. It was some time --

19 this was December, so it was sometime fairly soon before the

20 meeting. Late, late fall.

21 Q Okay, and what, if anything, did you do upon receiving

22 disclosure that a transaction had been entered into without

23 pre-approval?

24 A I gathered more information about, about the amount of

25 the payments, the nature of the speaking engagements. I think

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1 by this time I had actually attended one of his speeches.  
 2 The -- but and then I reminded the appropriate parties that  
 3 transactions like this in the future would need approval in  
 4 advance rather than ratification after the fact.  
 5 Q Okay, changing topic.  
 6 Do you oversee the Audit Committee?  
 7 A No.  
 8 Q Do you have any responsibility with respect to ensuring  
 9 that a related-party transaction is fair, reasonable and in the  
 10 best interest of the NRA?  
 11 A That's a determination that's made by the committee.  
 12 All that we on the staff can do is bring the information to the  
 13 committee; and in some cases, maybe advocate for the transaction  
 14 if it's important to whoever is the operational person in that  
 15 business area.  
 16 Q Do you have a vote on these transactions?  
 17 A No.  
 18 Q Who has the vote on these transactions?  
 19 A The committee members.  
 20 Q And how many committee members are there?  
 21 A Five.  
 22 Q Does the committee, the Audit Committee have any  
 23 responsibility to oversee you?  
 24 A They're all board members. So they all, ultimately,  
 25 vote on reelecting me as secretary. They elect to set my

1 Ackerman McQueen. Do you recall that?  
 2 A I do.  
 3 Q And there's been a question raised about whether it was  
 4 appropriate for the Audit Committee to consider that arrangement  
 5 with only a contract summary.  
 6 Do you remember that?  
 7 A I do.  
 8 Q Can you describe for the jury what I'm talking about  
 9 when I say "contract summary?"  
 10 A Sure. So, basically, going into the September 2018  
 11 meeting, the -- several people, including me, had been trying to  
 12 get the actual contract or details about the contract so that  
 13 the committee and the NRA board could fully understand it, and  
 14 hadn't met with much success, but we did -- our outside counsel,  
 15 Steve Hart, did get from Ackerman a short summary of some key  
 16 points of the contract which the committee -- the committee  
 17 considered.  
 18 The conflict-of-interest policy says that the committee  
 19 has to evaluate the material facts, material terms and that was  
 20 what we understood to be the -- what the committee understood to  
 21 be the material terms as best we could get them at the time.  
 22 (Continued on next page)  
 23  
 24  
 25

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1 compensation. Currently, two of them are the president and one  
 2 of the vice presidents.  
 3 Q So, they're your bosses; right?  
 4 A Yes.  
 5 Q It's not the other way around?  
 6 A Absolutely.  
 7 Q All right. Now, once you were provided the Audit  
 8 Committee with notice of the transaction or conflict, what  
 9 further responsibility do you have at that point with respect to  
 10 that transaction or that conflict?  
 11 A I would assist them in whatever way they see fit,  
 12 whether that's to help bring in someone else to explain the  
 13 situation, to help look for additional documents as I did with  
 14 Lieutenant Colonel North; but it is really -- it's really their  
 15 job once they have that.  
 16 Q Let me ask you a related question, you mentioned  
 17 Lieutenant Colonel North.  
 18 Do you have any authority or power to prevent the Audit  
 19 Committee from considering a transaction?  
 20 A No, they can consider -- I mean, the whole point of the  
 21 way that the Audit Committee is set up and appointed is that  
 22 there's supposed to be an independent committee of the board and  
 23 have a lot of independent power to oversee NRA policies.  
 24 Q Now, it's been raised that the Audit Committee  
 25 considered Lieutenant Colonel North's employment agreement with

1 Q Now, if you thought it was prudent for the Audit  
 2 Committee to hold off on considering a transaction waiting to  
 3 get some further information, you could advise them of that;  
 4 right?  
 5 A Sure.  
 6 MS. STERN: Objection. Leading.  
 7 THE COURT: Overruled.  
 8 Q But I want to be clear. Do you have any power to stop  
 9 them from considering, if they want to?  
 10 A I can only -- you know, Major Land always used to --  
 11 used to come, and wanted to put lawyers in our place that  
 12 lawyers should be advisors, not deciders. And if they -- you  
 13 know, they -- once they have -- once the committee has the  
 14 information, they can proceed as they see fit.  
 15 Q So I want to change topics again.  
 16 Do you recall there coming a time in the Spring of 2019  
 17 when the NRA was the subject of unfavorable news stories?  
 18 A I remember it well.  
 19 Q Okay. What, if anything, did you do when those stories  
 20 came out?  
 21 A So really in early 2018 into 2019 and ever since when  
 22 there have been any kind of unfavorable stories that -- not just  
 23 that normal type of unfavorable stories, but the unfavorable  
 24 stories about legal or governance issue, I would try to address  
 25 them and evaluate whether, you know, is this something that's

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1 new. Is this something that we know anything about? Is this  
 2 something that requires further investigation? If it needs  
 3 further investigation, who is in the best position to do it?  
 4 Should it be done in-house? Should it be delegated to outside  
 5 counsel? Where does it fit in the big picture?  
 6 Q And in this period --  
 7 MS. STERN: Your Honor, I just want to raise the  
 8 fact that during the course of discovery, Mr. Frazer  
 9 repeatedly asserted privilege over his role with respect to  
 10 investigation development being allegations of wrongdoing.  
 11 And so in the interest of being consistent with that, I'm  
 12 just raising and flagging the issue as we proceed down this  
 13 path of inquiry.  
 14 MS. ROGERS: We object to this objection. This  
 15 question is one that he can answer without raising any sword  
 16 and shield issues. We have -- he's answered so many  
 17 questions within the scope of this question over the four  
 18 years of being dragged through investigative and then  
 19 litigation discovery that the objection is frivolous and  
 20 it's a frivolous speaking objection designed to disrupt the  
 21 testimony.  
 22 MS. STERN: Actually, your Honor, I think that we  
 23 can point to even a document that's in the binder of  
 24 documents that Mr. Frazer's counsel identified to us which I  
 25 believe a week ago the NRA objected to on privilege grounds.

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1 So I'm just flagging it for the Court and in all good faith.  
 2 MR. FLEMING: Your Honor, may I be heard?  
 3 The point of this is not so much to get into  
 4 privilege but just to show Mr. Frazer's responsiveness.  
 5 That's it.  
 6 THE COURT: Overruled.  
 7 Q So in this period of time, in the Spring of 2019 when  
 8 these unfavorable news articles are coming out -- well,  
 9 withdrawn. I believe I asked the question.  
 10 So can I have you turn to Tab 3, and this is just for  
 11 your binder. Don't put it up yet. This is PX 1801 for  
 12 identification, and it is absent of the spreadsheet that Ms.  
 13 Stern was just talking about.  
 14 But I would ask you if this refreshes any memory or can  
 15 help you tell us what, if anything, you were doing around this  
 16 timeframe.  
 17 MS. STERN: Excuse me, Mr. Frazer.  
 18 Mr. Fleming, I just didn't hear what you said. Did  
 19 you say it was absent the spreadsheet?  
 20 MR. FLEMING: Yes. I have left the spreadsheet out  
 21 because there was an objection.  
 22 MS. STERN: You're offering only the covering  
 23 email?  
 24 MS. ROGERS: The NRA has no objection to the cover  
 25 email, and we have no objection to Mr. Frazer testifying to

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1 what he did. Only about legal advice.  
 2 THE COURT: Okay.  
 3 Q Did you understand the question?  
 4 A Could I have the question again.  
 5 Q Yeah. Well, I'll paraphrase it.  
 6 So this email -- does the content of this email help  
 7 you tell us what, if anything, you were doing in Spring of 2019  
 8 with respect to investigating these news articles?  
 9 A Yes, it does.  
 10 Q Can you tell us what that was?  
 11 A Sure. So just in general --  
 12 MS. STERN: Noting our objection for the record.  
 13 THE COURT: Overruled.  
 14 A Just in general terms, what this reminded me of is that  
 15 in April 2019 at the Board meeting in Indianapolis, Mr. Cotton  
 16 who at the time was the Chairman of the Audit Committee still as  
 17 he had been for several years but he wasn't yet an NRA officer,  
 18 so he was a rank and file Board member and committee chairman  
 19 came to me and said we have had all these negative articles.  
 20 Can you put together a list of the allegations that are out  
 21 there and just at a high level what we are doing about them or  
 22 what we know about them just to make sure we are on top of  
 23 everything essentially.  
 24 Q With respect to that list, were you doing anything  
 25 about them to figure out what these issues were?

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1 A Yeah. I worked with my executive assistant at the time  
 2 to develop a spreadsheet that listed some of the key allegations  
 3 that were out there in the media and described, you know, status  
 4 of investigation or whether we had already determined something  
 5 to be incorrect or, you know, whatever according to the  
 6 situation.  
 7 Q Okay. And do you recall there coming a time in or  
 8 about the Summer of 2019 when Esther Schneider approached you  
 9 about issues that had been raised in unfavorable news articles?  
 10 A I do.  
 11 Q Okay. And do you recall testifying that you actually  
 12 had spent 40 minutes talking to her?  
 13 A Correct.  
 14 Q Were these the same issues that -- the ones you had  
 15 been investigating that you're speaking to Ms. Schneider about  
 16 in that call?  
 17 A A lot of them, yes.  
 18 Q So changing topics. Do you recall a question during  
 19 the plaintiff's redirect of their expert Mr. Hines?  
 20 THE COURT: Counsel, can we -- now that you're  
 21 moving on to a new thing, can we take our short break for  
 22 the afternoon.  
 23 MR. FLEMING: Yes.  
 24 THE COURT: We are going to take a short break. We  
 25 will come back in a few minutes.

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1 THE COURT OFFICER: All rise. Jury exiting.  
 2 (Whereupon, at this time the jury exits  
 3 the courtroom.)  
 4 THE COURT: I just want -- have a seat. Just a  
 5 couple of things I wanted to talk about. And Mr. Fleming, I  
 6 know you wanted to raise some things, but before we get to  
 7 that, logistics for tomorrow.  
 8 We have had a couple of days where there is a  
 9 little bit of a chaos and miscommunications and none of that  
 10 can happen tomorrow. Okay. There is no rain date. So you  
 11 need to be very tightly coordinated on which witness is  
 12 coming next.  
 13 I also don't want us to start a witness that we  
 14 can't finish. So I just need you all to really focus on  
 15 insuring that we have a -- you know, a smooth end of day  
 16 where the defendants can rest and get us going to the next  
 17 day. So I don't know how that's going to work, but you have  
 18 all had plenty of time to think about it. So it's very much  
 19 incumbent upon the defendants to plan out what they are  
 20 going to do and how long they are going to take and how many  
 21 hours everybody has left before the bell rings.  
 22 The plaintiff hasn't stood up yet today, so their  
 23 hours haven't been used yet today. So I'm just -- I don't  
 24 have a particularly constructive advice about how to do it.  
 25 I just don't want to hear people yelling at each other about

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1 tomorrow, well, they didn't tell me this or I didn't get  
 2 enough notice. We are at the end.  
 3 I got a letter with the related-party transaction  
 4 list, and I wanted to ask just a couple of questions, and  
 5 I'm trying to figure out how logistically to do this.  
 6 MS. STERN: Before we turn to the related-party  
 7 transaction list, just very quickly, if we can just -- we  
 8 got an email at 2:18 from Mr. Peters with the roster for  
 9 tomorrow. I just wanted to see if this is agreed upon by  
 10 the defendants.  
 11 THE COURT: I don't want to do this in front of me.  
 12 MS. STERN: Okay.  
 13 THE COURT: Whatever that is, I saw that and I took  
 14 that as the -- that's what prompted me to ask.  
 15 I don't know how to put this politely. I don't  
 16 want to hear about about this. I want you to all make this  
 17 work. I can't really micromanage, especially toward the end  
 18 when there is no maneuverability about moving somebody to  
 19 the next day. So I'm sure you will be able to work it out.  
 20 I just wanted to ask a couple of questions about  
 21 the related-party list. The one that I had a question about  
 22 was the one that had been just listed as Member Marketing  
 23 Partners. And so I see the description here, and I'm just  
 24 trying to see how this fits within the statutory definition  
 25 of a related-party transaction.

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1 Does anybody on the State side -- can you explain  
 2 that to me? Because it's -- it has to be a transaction, and  
 3 the transactions I assume you're talking about here are the  
 4 contracts between the NRA and these vendors.  
 5 Now, I can see how the conflict-of-interest policy  
 6 might be implicated in general. But what's the -- are you  
 7 saying because there were these separate spreadsheets -- I  
 8 mean, the McKenzies are not related parties. They are not  
 9 relatives. So you seem to be arguing that Mr. LaPierre is  
 10 financially interested in the vendor relationship because of  
 11 some other things that are going on where they go on yacht  
 12 trips and all that.  
 13 Is there any law that says that that falls within a  
 14 related-party transaction? Because that's not the usual  
 15 party set up for a related-party transaction.  
 16 MS. STERN: I think that in the enforcement of the  
 17 715, as you well know, there is not a lot of developed case  
 18 law under the N-PCL 715 but in other enforcement actions,  
 19 the office has brought 715 violations and obtained assurance  
 20 of discontinuance where the arrangement is essentially a --  
 21 a benefit called a kickback from the vendor and that creates  
 22 the financial interest. And I would be happy to provide the  
 23 Court with that assurance of discontinuance involving a  
 24 similar --  
 25 THE COURT: Well, that's not really law. I mean,

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1 let's start with language of the statute; right.  
 2 Where do you get -- where does that come from?  
 3 Does that authority come from -- you know, kickback -- I get  
 4 a kickback.  
 5 In other words, if there was a -- and I view a  
 6 kickback as, you know, under the contracts with the NRA,  
 7 there was a separate and secret contract where every million  
 8 dollars the vendor gets, Mr. LaPierre gets \$100. That's not  
 9 what you have here. That would be a transaction in which he  
 10 is interested because he is getting a seemingly direct  
 11 benefit. I'm having some trouble understanding how this  
 12 fits into that definition.  
 13 So you're just saying -- well, I'll just leave it  
 14 at that. I don't really see how this fits within the  
 15 statutory definition of a transaction in which they have a  
 16 financial interest. I get it. I mean, there could be --  
 17 there is a separate conflict-of-interest policy section of  
 18 the statute, but that's not what this is. Right?  
 19 So you're just saying in the past, you have  
 20 enforced it, but that, you know, we are now on trial here.  
 21 And so I have to have a legal rationale for it, and I don't  
 22 really understand the argument for that one.  
 23 MS. STERN: Your Honor, I guess I would just --  
 24 THE COURT: Doesn't company -- the way the  
 25 related-party transaction process works is you have a

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1 transaction and then you should know based on the four  
 2 corners of the -- I think it's transaction or other  
 3 arrangement. You should know from the arrangement that this  
 4 is -- there is a related-party who has an interest in it.  
 5 This one is one where the only interest that you're  
 6 raising is that separately they have this friendly  
 7 relationship where they get all these fancy perks.  
 8 So I'm just trying to figure out how that's one  
 9 contractual arrangement.  
 10 MS. STERN: Well, I mean, I think as we explain in  
 11 the letter and that there is a relationship between the  
 12 contracts and the receipt of these substantial --  
 13 THE COURT: You haven't -- there's been no evidence  
 14 that -- this may sound ridiculous, but there is no  
 15 contractual term vis a vis the NRA that says among other  
 16 things you have to give these benefits to our CEO. That's  
 17 not part of the arrangement with the NRA. Just separately  
 18 they do these things which you have sort of suggested is a  
 19 conflict of interest, but the conflict of interest is more,  
 20 you know, selecting them.  
 21 Now, you make this point in your chart that you  
 22 sent me that while there seems to be a relationship between  
 23 when these boat trips happened and the increase in the fees.  
 24 MS. STERN: Correct.  
 25 THE COURT: So is that the evidence that it's all

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1 part of one deal in that it's a quid pro quo that they only  
 2 got the next transaction because of the boat trip?  
 3 MS. STERN: It's all part of the same scheme, yeah.  
 4 MR. CORRELL: Your Honor --  
 5 MS. STERN: I think in Mr. Connell, his  
 6 examination, he showed the relationships between --  
 7 THE COURT: I remember that.  
 8 MS. STERN: -- the changes in the financial terms  
 9 of the transaction.  
 10 THE COURT: Isn't that sort of post hoc ergo  
 11 proctor hoc?  
 12 MR. CORRELL: Yes, it is, your Honor.  
 13 THE COURT: Definition of related-transaction --  
 14 related-party transaction is as I think Mr. Farber pointed  
 15 out to me the other day, is that it's a transaction that  
 16 would not be customarily reviewed by the Board or Boards of  
 17 similar organizations. And I noticed in your list were  
 18 things like, you know, Ms. LaPierre's hair and makeup.  
 19 Is it your position that that is the kind of thing  
 20 that would normally be reviewed by the Board of Directors.  
 21 MS. STERN: Under their policy, it would be.  
 22 THE COURT: Because it's a related-party  
 23 transaction or because --  
 24 MS. STERN: And raises a conflict of interest. The  
 25 very policy that we were just going through with Mr. Frazer.

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1 THE COURT: So it's a related -- so the statute  
 2 says that it's not a related-party transaction if it's not a  
 3 transaction that would customarily be reviewed by the Board.  
 4 I assumed what that means is if it was an unrelated  
 5 party transaction, we wouldn't review it. In other words,  
 6 it's the kind of -- whether it's di minimus or something  
 7 else that, you know, people are not going to the Board for  
 8 review of. You view it more as it's customarily reviewed by  
 9 the Board because the internal guidelines here provide that  
 10 all related-party transactions get reviewed by the Board.  
 11 MS. STERN: Yeah, because that's their own  
 12 internal. That's the standards that they have set.  
 13 MS. ROGERS: Let me be heard briefly.  
 14 THE COURT: Let me just finish with them.  
 15 Now, another one that I just was looking at.  
 16 Millie Hallow's son doing music service. Is that something  
 17 that rises to the level of a related-party transaction under  
 18 this definition?  
 19 MS. STERN: It was in fact reviewed by the Board,  
 20 your Honor.  
 21 THE COURT: Well, that's a different question;  
 22 right.  
 23 The statutory definition which is what I have to  
 24 apply, you know, has a carve out which at least it seems to  
 25 me is designed to incorporate a couple of different things.

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1 One, if it's not customarily reviewed and also if  
 2 it's di minimus. So is the financial impact of these music  
 3 services more than di minimus?  
 4 MS. STERN: I hate to sort of punt on the question,  
 5 but I'm the wrong person to answer that question --  
 6 THE COURT: Okay.  
 7 MS. STERN: -- right now, but -- so I'm sorry about  
 8 that.  
 9 THE COURT: Yeah. I mean, I understood the rest of  
 10 the list.  
 11 There is a bunch of Board member transactions.  
 12 They are not enormously large, but I think -- and I also  
 13 view transactions with current officers for post-employment  
 14 as sort of inherently the kind of things that Boards do look  
 15 at, but those few seemed a little odd for the list.  
 16 So I mean, I'm going to think about it.  
 17 MS. STERN: I would just sort of point out how are  
 18 the parties that are involved in these transactions and that  
 19 they are -- for instance, Millie Hallow, her role in the  
 20 organization being Mr. LaPierre's long-time advisor and  
 21 confidant and the idea of getting special treatment is sort  
 22 of -- that's really at the heart of --  
 23 THE COURT: Well, but that's circular; right? In  
 24 other words, it's a related-party transaction because it's a  
 25 related-party transaction. That sort of takes away those

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1 sub-paragraphs about things that are specifically defined as  
2 not being.

3 So by definition, the way the statute is written,  
4 at least as I read it, you start with the idea that it  
5 otherwise meets definition of related-party transaction, but  
6 the statute says, however, it's not a related-party  
7 transaction if one of these four things is true.

8 So you seem to be saying that, well, the fact that  
9 it's a related-party is why it's subject to review, but that  
10 would make those exceptions meaningless.

11 MS. STERN: Well, it's also the nature of the --  
12 what are they contracting them for.

13 So if it's something that looks like it's a, you  
14 know, gimme to somebody's son or daughter, that's what  
15 raises the regularly of it.

16 THE COURT: I understand that it's -- it may be  
17 troubling or it may be sort of odd, but I have to kind of  
18 understand. The legislature carved certain things out. So  
19 something that would otherwise be a related-party  
20 transaction. So it has all of those problems. They are  
21 saying to me or to all of us that it's not -- it says except  
22 that a transaction shall not be a related-party transaction  
23 if any one of these four things is true. One of which is  
24 that it's di minimus. Two of which is that it would not  
25 customarily be reviewed by the Board or the Boards of

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1 similar organizations in the ordinary course of business.  
2 And this is the part or -- that carve out is -- and is  
3 available to others on the same or similar terms. So that  
4 carve out has to have both things. So even if it's -- you  
5 know, the hair stuff would not be ordinarily reviewed. It's  
6 not in the exception unless it's that and also offered to  
7 others. So I get that.

8 So anyway, I'm. I don't -- some of these ones on  
9 the list didn't get a lot of air time during your case, so  
10 I'm not familiar with what they are, but I am now certainly  
11 going to include all the exceptions in the instructions that  
12 Mr. Farber was urging me to include because some of these  
13 clearly raise at least a potential for falling within one of  
14 them because you now have a couple in here that are not the  
15 big dollar ones and -- but I am still interested -- I  
16 don't -- I'm not looking for more letters, but I'd like to  
17 get a little better understanding for the big one which was  
18 the MMP.

19 MS. STERN: Okay.

20 THE COURT: How that's a related-party transaction  
21 is a little unclear to me. So let me just get -- I know we  
22 are wasting time here, but let me let the people who are  
23 standing up -- Ms. Rogers wanted to talk first.

24 MS. ROGERS: Very just briefly.

25 The extent that they are alleging MMP is a

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1 related-party transaction, all the evidence they have put in  
2 is that boat trips happened, and Mr. -- and the contract was  
3 amended in the same or subsequent year, and there were  
4 frequent boat trips and frequent contract amendments. So  
5 that's the sum of the evidence. Then we think we should get  
6 a directed verdict on that.

7 Even assuming -- even if MMP, the type of financial  
8 interest that the statute contemplates is sort of elucidated  
9 by the definition of related-party which talks about owning  
10 35 percent of the company. That's the type of interest that  
11 the framework of the N-PCL had in mind. That's in N-PCL 102  
12 sub A sub 24.

13 THE COURT: Well, definition of related party is  
14 23. Definition of related-party transaction is 24.

15 MS. ROGERS: So they don't match up exactly, but  
16 they clearly interlock. And so what type of financial  
17 interest creates this related-party relationship, it's 35,  
18 and that's the type of financial interest that the statute  
19 seems attentive too. So it doesn't seem -- it doesn't seem  
20 sufficient.

21 THE COURT: Well, no. I mean nobody is saying MMP  
22 is a related party.

23 MS. ROGERS: We understand, your Honor, but I think  
24 it's sort of indirectly --

25 THE COURT: No. Their point here is they are

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1 saying that effectively the NRA's contract with MMP includes  
2 a payment to Mr. LaPierre, an implicit one.

3 MS. ROGERS: And they put in no evidence of that is  
4 the only response.

5 Separately, I believe that the record will show  
6 that the hair and makeup services were offered to others so  
7 that Ms. LaPierre was one of several ladies on the Women's  
8 Leadership Forum who received that service.

9 Finally, with respect to Millie Hallow. We  
10 discussed how the son's music services might not be  
11 customarily reviewed by the Board. It's also important to  
12 note that Millie Hallow does not meet the statutory  
13 definition of a key person; and therefore, does not meet the  
14 statutory definition of a related party.

15 What they've established at best is that she was a  
16 trusted and favored secretary who received a low six figure  
17 salary, but the type of stake in the organization that makes  
18 you a key person, the type of control with the statute says  
19 you have to be on par with the director or officer. A very  
20 connected secretary just simply doesn't meet the standard.

21 THE COURT: Okay. I want to move this fast because  
22 I need to get them back in here, and I need to hear from Mr.  
23 Fleming.

24 MR. CORRELL: Well, I agreed with her arguments,  
25 and there are other points which is they didn't assert this



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1 against Mr. LaPierre in their complaint.  
2 THE COURT: This may be one -- is it asserted  
3 against Mr. LaPierre or just against the NRA? This one.  
4 This one may be both.  
5 MR. CORRELL: And your Honor, they asserted one  
6 claim, the tenth cause of action under 715. Now they are  
7 trying to add more that they didn't allege, they didn't give  
8 us discovery of. They have complained over and over  
9 again --  
10 THE COURT: They don't have discovery to give you.  
11 These are all discovery from the NRA and from you. They  
12 don't -- they weren't parties to the transactions.  
13 MR. CORRELL: Your Honor, we could have moved to  
14 dismiss these at the threshold.  
15 THE COURT: Your point is it's not in the  
16 complaint.  
17 MR. CORRELL: It's not in the complaint, and it's  
18 not a related-party transaction. This is --  
19 THE COURT: The yacht trips aren't in the  
20 complaint?  
21 MR. CORRELL: They are in the complaint, but they  
22 are not alleged as a cause of action under 715.  
23 THE COURT: Doesn't the -- doesn't the -- that  
24 section of the complaint incorporate all the factual  
25 allegations?

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1 THE COURT: It's false filing.  
2 If you were the one, and there is something about  
3 you are the one who either makes the statement or  
4 whatever -- I noticed that nobody had cited any cases. I  
5 thought about it. But is there a -- some sort of intent  
6 requirement or negligence requirement? And I didn't see any  
7 basis for including one.  
8 (Continued on the following page.)  
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1 MR. CORRELL: Yes, but it doesn't assert them as a  
2 cause of action against him. It says it's a conflict of  
3 interest, but it doesn't say it's a related-party  
4 transaction. They don't seek any damages.  
5 THE COURT: I'm going to think about the list and  
6 see whether there is any on there that I don't think should  
7 be.  
8 MS. ROGERS: Can I say really --  
9 THE COURT: His is a whole different thing, and we  
10 may not have time to do it.  
11 MR. FLEMING: So there is two things.  
12 In the Executive Law charge in particular on  
13 Page 64 of 81 which relates to the false filings against  
14 Frazer, I had included additional language adding basically  
15 at the end, and I wrote in haste "knew or should have  
16 known." It struck me later, and what I wanted to raise on  
17 Friday was that I think the more appropriate language would  
18 be if your Honor was inclined to add a scienter requirement  
19 is "knew or believed," and the reason for that is that's the  
20 certification that Mr. Frazer --  
21 THE COURT: The problem is that there is no  
22 reference to a scienter requirement in the statute, and I  
23 don't think that anybody has cited to me any case law that  
24 would impose one.  
25 MR. FLEMING: Well --

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1 MR. FLEMING: I would say this. There's the false  
2 filing charges against two defendants, the NRA and Frazer.  
3 With respect to Frazer, the complaint is absolutely  
4 crystal clear that the basis for including him is his  
5 certification in the CHAR500, that he knew or to the best of  
6 his knowledge and belief the attachments were true, correct  
7 and complete.  
8 THE COURT: So, it would have to be the  
9 certification is false because --  
10 MR. FLEMING: Right, and I know that there's,  
11 there's a -- in the statute, it talks about being  
12 responsible for the statement and your Honor had written --  
13 and I think correctly so -- that responsible means cause and  
14 maybe that takes care of the scienter part. Causing the  
15 false statement, maybe that takes care of it, but it is --  
16 there is this tension there with respect to the charge  
17 against the individual.  
18 THE COURT: All right, I'll think it over.  
19 All right, I'm sorry to burn our whole break there,  
20 but let's get the jury.  
21 MS. STERN: Your Honor, could we have the briefest  
22 break to just use --  
23 THE COURT: Yes, give them a two-minute warning,  
24 Officer. Thank you.  
25

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1

2 MR. CORRELL: Your Honor, I would just say a couple

3 of things. That Susan LaPierre who is not a defendant and

4 no claims were asserted against her, so it would be a little

5 late to try to join her as a party after the trial.

6 THE COURT: Well, again, I don't know whether that

7 is included as against Mr. LaPierre or is it against the

8 NRA?

9 MR. CORRELL: They are making it quite clear that

10 they're asserting these claims against Mr. LaPierre even

11 though they didn't put it in the complaint. It is just

12 wrong.

13 (Whereupon, at this time a short recess was then

14 taken.)

15

16 (Continued on next page)

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J. Frazer - by Defendant - Direct/Mr. Fleming Page 4223

1 Q And that's the same Mr. Sweeney we've talked about

2 before?

3 A It is.

4 Q If I could direct your attention to Part 4 of the form

5 and Question 28A.

6 A I see it.

7 Q What is asked by Question 28A of Part 4?

8 A So, Question 28 asks "If the organization was a party

9 to a business transaction with one of the following parties;"

10 and then, "A, is a current or former officer, director, trustee

11 or key employee."

12 Q And what did the NRA check in response to that

13 question?

14 A The NRA said "no."

15 Q We just finished looking you'll recall at the 2016

16 related-party transactions minutes.

17 Do you recall that?

18 A I do.

19 Q And certain transactions with directors, in fact,

20 occurred in 2016?

21 A That's correct.

22 Q Should the NRA have checked that box "yes?"

23 A You know, I think we would have relied on the advice of

24 Mr. Sweeney on that and Emily Cummins in house who worked on the

25 990s at the time. But I think, also, if you look at the -- at

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1

2 (Whereupon, at this time witness,

3 JOHN FRAZER, having been previously sworn/affirmed by the

4 Clerk of the Court, resumed the witness stand and testified

5 as follows:)

6 COURT OFFICER: All rise, jury entering.

7 (Whereupon, at this time the jury then entered the

8 courtroom.)

9 THE COURT: All right, please be seated. Thank

10 you.

11 DIRECT-EXAMINATION

12 BY MR. FLEMING: (Continuing)

13 Q So, Mr. Frazer, I'll go back to my last question.

14 Do you recall a question that the plaintiff on their

15 redirect of their expert witness, Mr. Hines, asked regarding

16 Question 28A of Part 4 of the 2016 Form 990?

17 A I think I do, yes.

18 Q I turn your attention to Tab 23.

19 MR. FLEMING: And I and call up the 2016 990, which

20 is in evidence.

21 (Displayed)

22 Q Before we turn the page, Mr. Frazer, who signed this

23 990?

24 A It was signed by Woody Phillips as an NRA officer and

25 Jim Sweeney, our paid preparer.

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1 the instructions for the form itself and for Schedule L, Part 4

2 it, the answer kind of makes sense.

3 Q I'm going to ask you to turn to your binder, Tab 24,

4 which is an Exhibit JFX 59A marked for identification.

5 I just ask you what that document is?

6 A It is the IRS Instructions for Form 990, the core form

7 itself.

8 Q And if you could just generally describe for the jury

9 what these instructions are?

10 A It is a fairly long document, which the IRS gives

11 definitions of terms and then it goes really section by

12 section and line by line trying to explain how to answer each

13 question.

14 Q And could you leaf through that and see if you believe

15 the NRA should have answered that box "yes" or whether they were

16 correct in answering it "no?"

17 MS. STERN: Objection, your Honor. I think we're

18 asking him to provide his legal advice on interpreting the

19 tax law requirements here.

20 MR. FLEMING: I can establish he's not a tax

21 lawyer. This is part of his diligence when he reviews

22 990s.

23 THE COURT: Well, that's a different question. If

24 you were going to ask him when you reviewed the 990 and

25 certified it, did you look at this and this and this, that's

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1 a fact question.  
 2 You're asking -- what you're asking him to do is  
 3 look at it and tell us now what he thinks.  
 4 MR. FLEMING: Poor question.  
 5 THE COURT: Which one of those are you doing?  
 6 MS. STERN: The witness just testified somebody  
 7 else did the tax preparation.  
 8 THE COURT: Well, this witness is also responsible  
 9 for other things he may have done.  
 10 So, go ahead.  
 11 Q Mr. Frazer, do you review the 990 after it is created  
 12 by the internal and outside accountants?  
 13 A It's been different from year to year, but currently, I  
 14 review usually several drafts of it.  
 15 Q And how about in 2016, what was your practice?  
 16 A In 2016, I relied as I think everyone did on Emily  
 17 Cummins and on the outside preparers, but I would review  
 18 whatever I was asked to review or if I was looking through it  
 19 and thought I had a question.  
 20 Q Generally, do you refer to the IRS instructions when  
 21 you're doing your review?  
 22 A Constantly.  
 23 Q Now, do you have any understanding from your general  
 24 practice now whether there's sort of a guiding principle for  
 25 what gets disclosed on Schedule L of the Form 990?

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1 A Sure. So the Schedule L has to do with several  
 2 different distinct categories of dealings with officers,  
 3 directors and key employees. They're known as disqualified  
 4 persons in the Federal Tax Code.  
 5 Q Does the IRS in its instructions to your recollection  
 6 give instructions about what, if anything, should be put on  
 7 Schedule L and if not, why not?  
 8 A Sure. There's a whole separate instruction booklet for  
 9 Schedule L.  
 10 Q Before we get to the Schedule L instruction, is there  
 11 any profit to be gained by looking at the, in your view, the IRS  
 12 general instructions with respect to Question 28A or is it  
 13 better to go to Schedule L instruction?  
 14 A I mean, I think if you're trying to answer a question  
 15 about something that might or might not be on Schedule L, you  
 16 have to look at both.  
 17 Q Well, if I could turn your attention the Tab 25 and ask  
 18 you what that document is.  
 19 A It's the 2016 Schedule L instructions.  
 20 Q And so, can you -- I mean, I don't know what you would  
 21 do, but what would you do to try to figure out whether a  
 22 question was correctly answered or not answered?  
 23 A I would go to the instructions for that question.  
 24 Q So, can you do that for the jury and explain kind of  
 25 what you're doing while you're doing it?

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1 A Sure. So, the core form instructions on Question 28  
 2 say this might or might not be on Schedule L, Part 4, so --  
 3 MS. STERN: Objection to reading from the document,  
 4 which is not in evidence at this point.  
 5 THE COURT: Overruled. First of all, I'm not sure  
 6 we know -- we now have two exhibits open. Which one are you  
 7 talking about?  
 8 Q Can you explain which one you're looking at?  
 9 A I'm in Tab 25, the Schedule L instructions.  
 10 THE COURT: You haven't introduced these. Do you  
 11 want to?  
 12 MR. FLEMING: Can I, yes? They are public  
 13 documents.  
 14 THE COURT: They are admitted. 25 which is the  
 15 Schedule L instructions and JFX 59B; and 24, which are the  
 16 instructions for Form 990 are JFX 59A and they are both  
 17 admitted.  
 18 (Whereupon, at this time Exhibit JFX 59A and JFX  
 19 59B were admitted and received into evidence.)  
 20 Q So, you're looking at JFX 59B right now; right?  
 21 A Yes.  
 22 Q And so just continue, can you tell us what you're  
 23 looking at and what your thoughts are on this question?  
 24 A So, I'm looking at the Part 4 instructions which talk  
 25 about what you have to report regarding business transactions

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1 involving interested persons -- I'm sorry, I said disqualified  
 2 persons. It was interested persons, and then there are also  
 3 some exceptions.  
 4 Q Okay, and take us through kind of what you think are  
 5 the salient points in these exceptions.  
 6 A So, generally speaking, in the -- what needs to be  
 7 reported is there's a whole list; but, basically, business  
 8 transactions with officers, directors, key employees and their  
 9 relatives, where the total payments exceeded a hundred thousand  
 10 dollars or there's a lot of others.  
 11 Q Okay.  
 12 A So a hundred thousand is basically the threshold.  
 13 MR. FLEMING: Can we publish JFX 59B on the screen,  
 14 please.  
 15 Q What page are you on?  
 16 A Page 4, bottom of the page.  
 17 Q On page 4, bottom of the page.  
 18 (Displayed)  
 19 Now, in the "Exceptions" paragraph right in the middle  
 20 column, do you see that?  
 21 A I do.  
 22 Q Does it say anything about where these types of  
 23 transactions should be disclosed?  
 24 A It says don't report -- you go down to the boldface  
 25 compensations. "Don't report the following in Part 4." And one

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1 of the things you don't report is compensation that's reported  
 2 on Form 990, Part 7, Section A unless it is to a family member  
 3 of another person in that section.  
 4 Q And did you have an understanding of whether the  
 5 transactions that were greater than a hundred thousand dollars  
 6 were disclosed in Part 7, Section A?  
 7 A I believe they were.  
 8 Q If we could go back to Tab 23, which is the 2016 990,  
 9 and go to page 9 of 55.  
 10 A Okay.  
 11 Q Mr. Frazer, do you see that, do you see the entry for  
 12 Mr. Butz?  
 13 A I do.  
 14 Q And what does that disclose?  
 15 A It reports that he received \$150,000 in reportable  
 16 compensation in 2016.  
 17 Q And if you could turn to page 14 of 55, please.  
 18 And what does that disclose that's over a hundred  
 19 thousand dollars?  
 20 A It discloses that Ms. Hammer received \$206,000 in  
 21 reportable compensation.  
 22 Q Okay, and you could take that down.  
 23 If I could turn you -- your attention to Tab 12. This  
 24 is a 2011 Form 990.  
 25 A Okay.

J. Frazer - by Defendant - Direct/Mr. Fleming Page 4231

1 A I believe it was always Woody Phillips and Jim  
 2 Sweeney.  
 3 Q And did you -- do you know if the organization -- do  
 4 you know from personal knowledge whether the organization relied  
 5 on Mr. Sweeney's expertise on these questions?  
 6 MS. STERN: Objection.  
 7 THE COURT: Overruled.  
 8 A I know that Emily Cummins who I worked -- who was the  
 9 person in the treasurer's office who I worked directly with, had  
 10 very high praise for Mr. Sweeney's skills; and he died sadly  
 11 after first came back to the NRA and she was just devastated.  
 12 Q I have a couple more topics for you.  
 13 What department at the NRA is responsible for  
 14 solicitation of funds?  
 15 A The larger part of that would be the membership  
 16 division, which raises membership dues and additional  
 17 contributions on top of dues, like membership upgrades and just  
 18 add-on contributions, you know, roundup your dues, that kind of  
 19 thing.  
 20 And then the other division that has a major  
 21 fundraising role is the Office of Advancement, which is  
 22 responsible for the higher dollar -- higher donor net worth  
 23 individuals and then the Institute for Legislative Action does a  
 24 lot of its own fundraising.  
 25 Q Have you ever worked for the Membership Division?

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1 Q And we can pull it up, please, and turn to page 5 of  
 2 69, please.  
 3 A Okay.  
 4 Q Mr. Frazer, how did the NRA answer Question 28A in  
 5 2011?  
 6 A It checked "no."  
 7 Q And have you had occasion -- I don't want to belabor  
 8 the jury's time. Have you had occasion to look through the 2011  
 9 990 to see if there were transactions over a hundred thousand  
 10 dollars in that year?  
 11 A I believe there were.  
 12 Q And were they disclosed in Part 7, Section A?  
 13 A Yes.  
 14 Q And have you had occasion to look at the same questions  
 15 for the 990 in 2012?  
 16 A Yes.  
 17 Q Same answers?  
 18 A Yes.  
 19 Q And '13?  
 20 A Yes.  
 21 Q And '14?  
 22 A Yes.  
 23 Q And '15?  
 24 A Yes.  
 25 Q And who signed the tax returns in those years?

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1 A No.  
 2 Q Have you ever worked for the Advancement Division?  
 3 A No.  
 4 Q Now, you did work in ILA; right?  
 5 A I did.  
 6 Q Did you ever solicit funds for ILA?  
 7 A I reviewed fundraising letters as to factual accuracy  
 8 and make sure they were expressing our legislative and political  
 9 positions, but I never actually signed them or asked for money.  
 10 Q So, another topic.  
 11 Do you recall discussing earlier when you first were  
 12 here receipt of a directors and officers insurance policy in  
 13 August of 2021?  
 14 A I do.  
 15 Q And you testified you received that policy in  
 16 August 2021; right?  
 17 A I did.  
 18 Q Was that testimony correct?  
 19 A No, I misremembered the month.  
 20 Q When did you actually receive the D&O policy?  
 21 A Late September, on or around September 28th.  
 22 Q Do you recall whether September 28th was after  
 23 Mr. Marshall had filed an ethics complaint against you?  
 24 A Yes, it was about a week after he filed the complaint.  
 25 Q So, to be clear, at the time he filed the ethics

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1 complaint, you did not even have the insurance policies at that  
2 time?  
3 A That's correct.  
4 Q Another topic, last topic.  
5 Did the New York Attorney General ever speak to you  
6 during its investigation of this case?  
7 A No.  
8 Q Now, they filed this case on August 6th, 2020. Is that  
9 right?  
10 A Yes.  
11 Q Can you describe for the jury how you found out that  
12 you were named as a defendant in this case?  
13 A Yeah, while I was driving into work, I got -- to the  
14 office that day, I got a call giving me a heads-up that the  
15 attorney general may -- was having a press conference and that  
16 it might be announcing some action against the NRA. There was  
17 another issue that it might have been as well.  
18 So at the -- at the scheduled time, I found it  
19 streaming online somewhere, and I watched the news conference  
20 and learned I was being named as a defendant.  
21 Q Did you hear anything else during that press conference  
22 that pertained to you?  
23 A The attorney general referred to me and the other  
24 then -- the other three defendants -- Mr. Powell was still in  
25 it -- as using the NRA as our personal piggybank.

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1 Q Did you come to understand that those comments at the  
2 press conference were reduced to news articles?  
3 A It's been quoted in numerous articles.  
4 Q How has that event affected personal and work  
5 relationships in your life?  
6 A It's very stressful personally, obviously. It's also  
7 something that my family, my wife and kids worry about. And  
8 beyond that, it's been very painful, frankly, to see friends and  
9 people that I respect, see social media posts quoting, posting  
10 approving of this article, these articles; and saying, Oh, this  
11 is terrible. These people all need to be thrown out or  
12 whatever, and these people in some cases that I have known for  
13 years.  
14 Q Let me ask you a direct question about your benefits  
15 received from the organization.  
16 Apart from your employment compensation, have you  
17 gotten a penny from the NRA?  
18 A No, just salary and approved benefits.  
19 Q How is your employment compensation determined?  
20 A The Office of Compensation Committee makes a  
21 recommendation to the board every fall for the upcoming year,  
22 and then the board votes on it at the same meeting in,  
23 typically, September.  
24 Q Are you forbidden from having any involvement in that  
25 process?

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1 A Yes.  
2 Q And do you comply with that prohibition?  
3 A Yes. Wayne and I and the treasurer, Ms. Rowling now  
4 and Ms. Spray and Mr. Phillips before all step out of the room  
5 when that discussion is happening.  
6 Q Now, you serve on two positions at the NRA; correct?  
7 A Yes.  
8 Q Secretary and General Counsel?  
9 A That's correct.  
10 Q Prior to 2015, can you describe for the jury whether  
11 those two positions were staffed by separate people?  
12 A Always.  
13 Q And were they compensated separately?  
14 A Yes.  
15 Q And is your compensation at the NRA equivalent to a  
16 combination of those two persons salaries?  
17 A No, it's probably less than half of what the two  
18 combined were in 2014.  
19 Q So, are you talking about when you first started in  
20 2015 or now?  
21 A Then and now. My salary has actually gone down since I  
22 started.  
23 Q Now, can I call up for identification -- actually, I'll  
24 just turn you to Tab 4, and ask you if you recognize this  
25 e-mail?

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1 A I do.  
2 Q Is that your e-mail at the top?  
3 A It is.  
4 Q And is this something you wrote?  
5 A It is.  
6 MR. FLEMING: I move its admission, your Honor.  
7 MS. STERN: No objection.  
8 THE COURT: It is admitted, PX 2231.  
9 Q Ms. Frazer, what is going on in this e-mail?  
10 A This is an e-mail from early January of 2021. It is a  
11 few days before the board meeting that was held that month that  
12 you've heard some other testimony about; and what was going on  
13 was that I had become aware from talking to Mr. LaPierre and  
14 Mr. Spray that the Office of Compensation Committee would be  
15 meeting again. And this is the winter meeting which is not  
16 where they would usually consider compensation, so to back up a  
17 second, I'll explain.  
18 This is 2021. In 2020, when COVID hit, we were all  
19 worried about the financial impact of the NRA; and so the NRA  
20 imposed an across-the-board 20-percent pay cut on all levels of  
21 employees. And those people whose compensation was set by the  
22 board or who had employment contracts all signed voluntary  
23 amendments or agreements to agree to that reduction. And  
24 Mr. LaPierre actually took a 30-percent cut.  
25 But, then as things kind of started to normalize and we

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1 had -- we figured we were going to be okay, we started restoring  
 2 salary to pre-COVID levels, and they gave the managers  
 3 discretion about how to do that.  
 4 My position was to give -- was to restore it from the  
 5 bottom up, so the lowest paid employees would get their pay  
 6 restored first. So, I was still at the 20-percent reduction.  
 7 When I found out that they were talking about basically a  
 8 full -- I think it was a full restoration at this time and I  
 9 think they were also talking about the retention bonuses that  
 10 were discussed earlier; I said, Well, wait a minute. If the  
 11 staff isn't getting everything back quite yet, I want to put a  
 12 cap on what restoration I get. And so I sent this e-mail to  
 13 Carolyn Meadows as the Chairman of the Office of Compensation  
 14 Committee and also to Craig Spray because he would be  
 15 responsible for managing any funds.  
 16 Q In speaking to the retention bonus that was testified  
 17 about earlier, did that ever happen?  
 18 A There was never any -- never a retention bonus was  
 19 never paid to me, and there was never a pay restoration.  
 20 Q Mr. Frazer, have you ever asked for a raise from the  
 21 NRA?  
 22 A No.  
 23 MR. FLEMING: I have nothing further.  
 24 THE COURT: Okay, any other parties have any direct  
 25 testimony?

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1 involved in negotiating the contract.  
 2 Q So, would Mr. LaPierre have been involved in deciding  
 3 how much MMP got paid?  
 4 A Not in the course of that contract negotiation or  
 5 after.  
 6 Q You also testified a moment ago with your counsel that  
 7 your compensation and other compensation started to be restored  
 8 after COVID; right?  
 9 A Yes.  
 10 Q But yours was never restored to pre-COVID level right?  
 11 A That's right.  
 12 Q Do you have an understanding as to whether other  
 13 officers' compensation was restored to pre-COVID level?  
 14 A Some of them were restored, at least partly; but I  
 15 don't know if any of them were ever restored fully.  
 16 Q Mr. Frazer --  
 17 MS. ROGERS: Actually, can we bring up for  
 18 identification DX1-0241.  
 19 I only have one hardcopy of this document, but I  
 20 don't expect it to be controversial.  
 21 Q Let me know when it is on your screen.  
 22 THE COURT: You have to turn the screens off, I  
 23 guess.  
 24 MS. ROGERS: Any objection?  
 25 MS. STERN: No objection.

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1  
 2 MS. ROGERS: Direct.  
 3 THE COURT: Direct, okay.  
 4 DIRECT-EXAMINATION  
 5 BY MS. ROGERS:  
 6 Q Good afternoon, Mr. Frazer.  
 7 MS. ROGERS: Can the jury hear me? Okay.  
 8 A Good afternoon.  
 9 Q Mr. Frazer, you testified earlier that to your  
 10 understanding, Mr. LaPierre was walled off from the  
 11 renegotiation of the MMP contract; right?  
 12 A Yes.  
 13 Q But you also testified that from a business  
 14 perspective, his -- he oversaw the division that owned that  
 15 contract; right?  
 16 A Right.  
 17 Q Can you just explain to the jury to your understanding  
 18 the distinction between those two things?  
 19 A Sure. So -- so Mr. LaPierre was, ultimately, in the  
 20 chain of command above MMP or Allegiance or any of those  
 21 companies and was a primary user of their services. You know  
 22 they're writing speeches for him. They're working with him on  
 23 direct mails, strategies, digital fundraising and so on; but  
 24 that doesn't mean that he was necessarily involved in  
 25 negotiating the contract. In fact, he specifically wasn't

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1 Q Mr. Frazer --  
 2 THE COURT: You can turn it back on. It is  
 3 admitted.  
 4 (Whereupon, at this time Exhibit DX1-0241 was  
 5 admitted and received into evidence.)  
 6 Q Mr. Frazer -- well, we'll put it up.  
 7 (Displayed)  
 8 Can you describe for the jury what this document is?  
 9 A It is a sign-in sheet for one of the compliance  
 10 training seminars.  
 11 Q About how many compliance training seminars would you  
 12 estimate the NRA has had for staff only, not counting the  
 13 board?  
 14 A I've lost count over the last five years.  
 15 Two or three a year, I must have -- I must have done  
 16 six to eight, eight of them just for the staff.  
 17 Q Do you have an understanding as to roughly what  
 18 percentage of the senior staff have been compliance trained?  
 19 A At this point, I would say it is a hundred percent of  
 20 the senior staff.  
 21 Q Would you say they have been trained once or many  
 22 times?  
 23 A Most of them many times.  
 24 Q So, we heard that the NRA implemented compliance  
 25 training. We heard Mr. Phillips testify that the NRA is looking

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1 at things and directing at things and correcting things and we  
 2 heard the term course correction --  
 3 MS. STERN: I object to the attorney --  
 4 THE COURT: Yes, sustained.  
 5 Q But we've also seen, would it be fair to say, that  
 6 there were still some loose ends going into 2020; right?  
 7 A Oh, sure.  
 8 Q Does that surprise you?  
 9 A In -- in a big organization with four to five million  
 10 members and several hundred staff, seventy-six board members,  
 11 numerous non-board committee members and a lot -- and hundreds  
 12 of vendors, no. There's a lot of moving parts.  
 13 (Continued on next page)  
 14  
 15  
 16  
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 19  
 20  
 21  
 22  
 23  
 24  
 25

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1 related-party transactions under this policy or not. Okay?  
 2 A Right.  
 3 MS. STERN: Your Honor, I object. The witness just  
 4 previously testified that this is a function for the Audit  
 5 Committee, and in fact, said that that's not his role.  
 6 MS. ROGERS: He testified that his role is not to  
 7 determine ultimately whether the transaction is fair,  
 8 reasonable and in the best interest of the National Rifle  
 9 Association.  
 10 THE COURT: How do you distinguish the testimony  
 11 you're asking for from him as the general counsel giving his  
 12 legal view?  
 13 MS. ROGERS: Well, I think he can give his  
 14 interpretation of the policy without giving advice about the  
 15 law.  
 16 THE COURT: Even though the policy --  
 17 MS. ROGERS: Well, the policy, we argue was drafted  
 18 to fit the law, but the witness can testify we would argue  
 19 about how he understood this policy, and he did have a gate  
 20 keeping function for bringing it to the Audit Committee for  
 21 them to evaluate.  
 22 MS. STERN: I think they also just elicited  
 23 testimony that sending something to the Audit Committee does  
 24 not indicate that there is -- but the distance between him  
 25 as general counsel providing his interpretation of this

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1 Q All right. I want to talk more about related-party  
 2 transactions. And you reviewed with your lawyer the NRA's  
 3 related-party transaction policy that was in Tab 21 of your  
 4 binder which is PX 421, and I believe the policy starts on  
 5 Page 17 of 300. If you can turn there for ease of reference.  
 6 A We are in Tab 21?  
 7 Q I am looking for the first page of the policy, and my  
 8 pagination was different than yours.  
 9 MS. STERN: 24 of 300, I believe.  
 10 Q 24 of 300.  
 11 Mr. Frazer, can you explain to the jury within the  
 12 meaning of the NRA's policy the difference between a conflict  
 13 and a related party?  
 14 A Sure. A related-party transaction I think you have as  
 15 a subset of a conflict. So you draw a big circle. Conflicts of  
 16 interest would be anything where there might be some reason to  
 17 judge -- to question a relationship.  
 18 You know, is there an independent -- a loss of  
 19 independence, something like that. And then a related-party  
 20 transaction is a much narrower category where there is a direct  
 21 financial or business interest at stake.  
 22 Q All right. I want to walk through a few transactions  
 23 and I don't want you to testify about legal advice you gave the  
 24 NRA, but I would like you to testify about how you analyzed each  
 25 of these transactions and whether you considered them to be

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1 policy which they say is equivalent to the legal standard.  
 2 THE COURT: Well, let me just ask.  
 3 MS. STERN: There is no light between those two  
 4 things.  
 5 THE COURT: Was he permitted to testify about this  
 6 question that you're asking now in discovery.  
 7 MS. ROGERS: I can't recall an instance in discovery  
 8 where they asked Mr. Frazer do you consider this contract a  
 9 related-party transaction. Maybe they can recall one.  
 10 MS. STERN: I don't remember the particulars of the  
 11 testimony in that regard so.  
 12 THE COURT: I'm just having trouble figuring out  
 13 why this isn't him giving his legal opinion because this is  
 14 effectively the -- this is the statutory definition.  
 15 MS. ROGERS: I would say it's his policy opinion,  
 16 and the jury -- the jury can obviously be instructed that he  
 17 is not telling them what the law is or whether each  
 18 transaction is legal, but he gathers up these  
 19 questionnaires, brings them to the Audit Committee. He  
 20 drafted this policy.  
 21 THE COURT: I just -- I think that internally,  
 22 wouldn't he be giving legal advice to people about what the  
 23 policy means?  
 24 MS. ROGERS: Right. So I'm certainly not asking  
 25 him -- I'm not asking him to testify, for example, I told

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1 the Audit Committee they don't have to worry about this one  
 2 or I explained why this one complied with the New York Law.  
 3 I'm instructing him not to testify to that end, but  
 4 I am hoping to elicit testimony about how he interpreted the  
 5 application of the policy he drafted to specific  
 6 transactions that came across his desk that the NRA's  
 7 accused of mishandling and the NRA relied on this executive  
 8 to help it handle.  
 9 MS. STERN: Your Honor, I just don't see how that  
 10 could be squared with the testimony that his counsel just  
 11 elicited.  
 12 THE COURT: That's a different question.  
 13 MS. STERN: Otherwise, he is just giving a legal  
 14 opinion.  
 15 THE COURT: No, I don't think that's necessarily  
 16 true.  
 17 MR. FARBER: Judge, I mean, there is also a  
 18 question of whether the relevance -- if this is all that he  
 19 is doing, the question for this jury on these things is  
 20 going to be whether they violate statutes or what this  
 21 means. But his sort of looking at this --  
 22 THE COURT: I don't think I can separate this from  
 23 his legal opinion. So sustained.  
 24 Q All right. Well, I'll ask you this.  
 25 Mr. Frazer, do you recall hearing testimony about a

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1 post-employment contract that was in effect for Mr. LaPierre  
 2 back in 2018?  
 3 A Yes.  
 4 Q Can you explain to the jury whether that contract was  
 5 rescinded?  
 6 A It was.  
 7 Q What about Ackerman's out-of-pocket expenses? To your  
 8 knowledge, did the NRA treat those as related-party  
 9 transactions?  
 10 A No.  
 11 Q What did the NRA do in 2018 when information surfaced  
 12 about Ackerman's out-of-pocket expenses?  
 13 A We started trying to get more information about it,  
 14 demanding information from Ackerman and asking to audit their  
 15 books.  
 16 MS. ROGERS: Let's pull up for identification PX  
 17 2333.  
 18 THE COURT: It's not in any book?  
 19 MS. ROGERS: It's not in a book. It's a  
 20 spreadsheet.  
 21 THE COURT: Okay. Pull it up.  
 22 Q Mr. Frazer, do you recognize this spreadsheet?  
 23 A I do.  
 24 Q And let's go to the key observations tab.  
 25 Mr. Frazer, what is this spreadsheet?

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1 A This is a spreadsheet prepared by the forensic  
 2 accounting firm Forensic Risk Alliance that we retained a couple  
 3 of times, but this one was to review the Ackerman's  
 4 out-of-pocket expenses.  
 5 Q Did you rely on this spreadsheet in the ordinary course  
 6 of your work?  
 7 A Yes.  
 8 Q What -- without revealing legal advice you gave, what  
 9 did you use the spreadsheet for?  
 10 A It was part of the process that we went through that  
 11 ultimately resulted in litigation against Ackerman.  
 12 MS. ROGERS: I offer its admission?  
 13 MS. STERN: Objection, your Honor. This is  
 14 hearsay.  
 15 THE COURT: Seems right to me.  
 16 MS. ROGERS: The witness relied on this document in  
 17 commencing litigation.  
 18 THE COURT: It's not a business record of the NRA.  
 19 So in relying in the ordinary course is not what makes it  
 20 admissible. It's a drafter preparing it, and they were in  
 21 the ordinary course which this wouldn't be. This was an  
 22 assignment they were working on, and it has all sorts of the  
 23 factual findings.  
 24 MS. ROGERS: But we would argue, your Honor, the  
 25 fact that this work was done, the fact that the NRA hired

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1 forensic accountants to create this exhaustive analysis of  
 2 the expenses being paid goes to the NRA's diligence as to  
 3 these expenses.  
 4 THE COURT: There's been testimony about their  
 5 retention of these guys, and that's fine; but this --  
 6 admitting this is admitting their findings which is hearsay.  
 7 So sustained.  
 8 Q Mr. Frazer, after you hired forensic accountants to  
 9 review the Ackerman out-of-pocket expenses, what did the NRA do?  
 10 A We further -- well, first we sued them to demand their  
 11 books and records, and I was actually -- there was actually two  
 12 suits. One in Virginia and one in Texas. And then it was also  
 13 used in some later investigations.  
 14 Q Were the particular findings by the forensic  
 15 accountant -- strike that. What's McKenna?  
 16 A McKenna Associates. McKenna and Associates is a  
 17 fundraising consulting firm in Virginia.  
 18 Q To your knowledge, how far back did the NRA's  
 19 relationship with McKenna go?  
 20 A I want to say 2013 or 2014. Something like that.  
 21 Q Before Josh Powell joined the NRA?  
 22 A That's correct.  
 23 Q But the NRA started paying McKenna more in 2018 than it  
 24 had previously; right?  
 25 A Yes, we did.



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1 Q Do you know of any reasons why the NRA might have paid  
2 McKenna more in 2018 than before?  
3 A Yes.  
4 Q Can you explain those to the jury?  
5 A Sure. So McKenna was originally retained at a fairly  
6 low rate to do identification of high net worth donors or  
7 potential donors and donor networks that we could work with to  
8 raise funds for the association; and -- but -- but because of  
9 the relationships that they had developed during 2018 when we  
10 started facing loss of financial -- financial relationships like  
11 banking and insurance due to government investigations and  
12 litigation and potential litigation, we -- we started using  
13 McKenna -- McKenna's contact for their contacts in that type of  
14 area to start rebuilding some operations or developing new  
15 options in terms of how to structure our membership insurance  
16 programs.  
17 Q Now, eventually it came to light that Josh Powell's  
18 wife had been hired as a contractor by McKenna; right?  
19 A Yes.  
20 Q And you were present at the Audit Committee meeting  
21 when the Audit Committee reviewed that transaction; right?  
22 A I was.  
23 Q Can you describe for the jury what the NRA did about  
24 that?  
25 A Yeah. The NRA -- I'd have to look at the Audit

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1 Committee minutes to remember all of the details, but basically  
2 the Audit Committee reminded Mr. Powell and anyone else that  
3 they needed to make timely disclosure of that type of  
4 relationship, and I think they demanded a further review of the  
5 relationship.  
6 Q To your knowledge, was the relationship subsequently  
7 limited?  
8 A It was. It was -- we reached an agreement with them to  
9 resolve some outstanding billing that we had concerns about.  
10 Basically, reviewed their bills for reasonableness and not to --  
11 to make sure they weren't duplicative, made a discounted  
12 payment, and then eventually reduced them to their original  
13 fundraising role, and finally terminated them all together.  
14 Q What is Jim Powell Photography?  
15 A Jim Powell is Josh Powell's father, and he is a  
16 professional photographer.  
17 Q And in 2018, you learned that Mr. Powell had been hired  
18 originally through Ackerman McQueen to photograph an NRA  
19 shooting competition; right?  
20 A I'm not sure if that was the original thing. I think  
21 Ackerman had hired him to shoot some NRA event, but then the NRA  
22 also hired him directly.  
23 Q Did you assist the Audit Committee in evaluating  
24 whether those transactions were fair and reasonable?  
25 A I did.

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1 Q Can you describe for the jury the diligence you  
2 performed to insure that those transactions were fair and  
3 reasonable?  
4 A I got information and presented it to the Audit  
5 Committee regarding the rates that Ackerman billed for Mr.  
6 Powell and for another photographer or photographers that they  
7 had used for NRA events, figured out how many hours they had  
8 worked and what the hourly rate worked out to.  
9 I don't remember the numbers, but I remember them being  
10 comparable, and that was presented to the committee.  
11 Q Did your office ever determine to treat Millie Hallow  
12 as a related party of the NRA?  
13 A No.  
14 Q Why?  
15 A Because there are definitions in New York Law and in --  
16 she wasn't an NRA officer or director ever.  
17 Q And Mr. Frazer, I'm going to tell you to testify about  
18 your policy, not about New York Law.  
19 A Sure. But then there was also a definition of key  
20 employee in the policy, and Ms. Hallow just didn't meet the  
21 definition.  
22 Q But she was a pretty influential secretary; right?  
23 A She was an important assistant to Mr. LaPierre, no  
24 doubt.  
25 Q So why didn't she meet the threshold?

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1 A Because the threshold is basically that the person is  
2 controlling a substantial part of the organization in terms of  
3 revenue or expenses or employee head count.  
4 Q Marion Hammer is a gun lobbyist; right?  
5 A She is.  
6 Q She is also a related party of the NRA because she is  
7 on the Board; right?  
8 A That's correct.  
9 MS. STERN: Objection to leading.  
10 THE COURT: I'll let you go for one more.  
11 Q Mr. Frazer, can you describe for the jury your  
12 understanding as to whether or not the NRA in addition to Ms.  
13 Hammer pays other gun lobbyists who are not on its Board?  
14 A Sure. The NRA from my experience in ILA, I can tell  
15 you the NRA hires contract lobbyists at the federal and state  
16 level depending on whether a person has an important  
17 relationship that we might want to take -- make use of.  
18 Q So the -- would it be fair to say the NRA makes  
19 payments to many gun lobbyists in the course of its business?  
20 A I don't know how many at any given time. It goes up  
21 and down, but it's definitely ordinary course of business from  
22 where I stand.  
23 Q Mr. Frazer, of your job as secretary is to oversee  
24 procedurally the NRA's Board elections; right?  
25 A It is.

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1 Q Can you describe for the jury the processes that are  
2 followed to insure that NRA elections are free and fair?  
3 A Sure, and I'll keep it brief because it is a  
4 significant amount of time that we spend on it. But basically,  
5 you start with a nominating process. That starts with each year  
6 with the election of the nominating committee. The nominating  
7 committee consists of six directors and three outside people  
8 just to make sure that we have a fresh perspective.  
9 The nominating committee gets suggestions based on a  
10 two-page magazine spread that runs every July to ask people to  
11 suggest -- suggest potential nominees, and people suggest their  
12 friends. They suggest themselves. They suggest celebrities.  
13 They suggest, you know, whoever they want. And then any of  
14 those people who are eligible are forwarded to the nominating  
15 committee when it meets in late summer, typically. And then --  
16 and then -- but that's not -- and the nominating committee votes  
17 on a slate of people to put on the ballot, but that's not the  
18 only way to run because you can also run by petition.  
19 So if you are passed over by the nominating committee  
20 or if you also want to say if you are also a choice of the  
21 members, you can circulate petitions, and the number of  
22 signatures you need to get varies, but it was 382 this year. So  
23 you get a few hundred signatures from your fellow members saying  
24 that you should be on the ballot and you are also qualified.  
25 You are on the ballot, and you run side by side with the

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1 nominating committee candidates.  
2 We go through a whole process of ballot tabulation by  
3 an outside auditing accounting firm, and the results are  
4 announced to the members.  
5 Q But how can the election be free and fair if we have  
6 seen text messages referring to a crib sheet of whom the  
7 directors might want to vote for?  
8 A For the nominating committee that is? Yeah, they can  
9 talk about who they want on the nominating committee, and they  
10 can suggest their preferred candidates, but there is also  
11 nothing to prevent anyone else from making nominations from the  
12 floor, and I've seen that happen actually. And you know, you  
13 have a competitive election -- actually, the time I recall  
14 Marion Hammer was the one that didn't get elected.  
15 Q And so you've seen those nominations from the floor  
16 succeed?  
17 A Yes.  
18 Q Would it be fair to say that critics of the NRA's  
19 leadership have successfully run on the floor and been elected?  
20 A For the nominating committee?  
21 Q Or for the Board.  
22 A Not for -- not -- for the Board, absolutely, yes.  
23 Q MS. ROGERS: Nothing further.  
24 THE COURT: We have a few more minutes, but if you  
25 want to use it.

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1 Is this direct?  
2 MR. CORRELL: Yes.  
3 DIRECT EXAMINATION  
4 BY MR. CORRELL:  
5 Q Good afternoon, Mr. Frazer.  
6 A Good afternoon.  
7 Q First question, was -- did Wayne LaPierre receive  
8 anything under the 2018 contract you referred to before?  
9 A Not that I know of.  
10 Q It's actually not a 2018 contract. It was an amendment  
11 to a contract that was originally signed in 2013; correct?  
12 A That's right.  
13 Q And then it was amended again in 2015; correct?  
14 A I believe that's right.  
15 Q And amended again in 2016; correct?  
16 A I don't remember the specific dates, but sounds right.  
17 Q And then superseded in January of 2021; correct?  
18 A Yes.  
19 Q Okay. And was there any loss of corporate assets due  
20 to that contract?  
21 A Nothing was ever paid under the contract.  
22 Q And that's because it didn't become effective unless  
23 and until he left the organization; correct?  
24 A Yes.  
25 Q And he never left.

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1 A Right. Until recently.  
2 Q Until recently.  
3 And there was never any loss to the -- of corporate  
4 assets due to that contract; correct?  
5 A No.  
6 Q Did Mr. LaPierre -- was his salary every restored to  
7 the full pre-Covid level?  
8 A I don't know if it was. I don't know what restoration  
9 he received, but my understanding is he was still at a reduced  
10 salary.  
11 Q And he actually took a pay cut like you did to make  
12 sure other people subordinates could get paid?  
13 A Right. It was across the board or more.  
14 Q And whose decision was that?  
15 A His.  
16 Q And your decision was independent to also take a --  
17 A I mean, it was a collective decision of the leadership  
18 that everyone would take at least 20 percent top to bottom.  
19 MR. CORRELL: Thank you.  
20 THE WITNESS: Thank you.  
21 MR. FARBER: No questions, your Honor.  
22 THE COURT: Okay. Will you need more than five  
23 minutes which I'm not suggesting you don't. Do you want to  
24 do that tomorrow?  
25 MS. STERN: I think so, your Honor.

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1 THE COURT: All right. We will break tonight and  
 2 we will meet tomorrow at 9:30. See you all. Travel safely.  
 3 THE COURT OFFICER: All rise.  
 4 (Whereupon, at this time the jury exits  
 5 the courtroom.)  
 6 MR. FARBER: Judge, can I raise something briefly?  
 7 THE COURT: Yes. I just wanted to note that today  
 8 was an exhibit of how things can be slower than they are  
 9 anticipated to go. Things can go more slowly than  
 10 anticipated, and that's what I was trying to signal for  
 11 tomorrow that you have to be conservative in what you plan  
 12 to introduce because we certainly didn't get to this third  
 13 witness that we were talking about, and we are not even done  
 14 with this one, and the AG hasn't even asked any questions  
 15 yet.  
 16 So you need to -- I guess I'll say particularly on  
 17 the defense side -- just get yourself organized so that  
 18 you're not -- that you can finish the witnesses who are  
 19 already up and that you don't start a witness that can't be  
 20 finished. And you probably know by now how much time the AG  
 21 has left. If it wants to preserve two hours or so, it's  
 22 probably not that much, but a little bit.  
 23 MS. STERN: It's an hour.  
 24 THE COURT: Well, if it's an hour, then you have to  
 25 make sure that all your directs are -- leave at least an

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1 hour in combination. So plan for at most three hours of  
 2 direct testimony. Three hours of direct and defense cross.  
 3 So anyway, I'm just doing math for you, but I'm  
 4 just -- I watched today go more slowly than you all  
 5 anticipated.  
 6 What was the issue?  
 7 MR. FARBER: It's another organizational issue,  
 8 Judge.  
 9 So tomorrow, testimony is going to end and then  
 10 closings are going to be on Thursday.  
 11 THE COURT: Yes.  
 12 MR. FARBER: I would ask that the Court direct that  
 13 if there are any -- if any party is going to use  
 14 demonstratives -- I'm not talking about, you know, admitted  
 15 exhibits but something that hasn't been admitted, that they  
 16 should be exchanged by say 6:00 tomorrow so that we are not  
 17 getting them, you know, at midnight or at 7:00 a.m. the  
 18 morning that we are doing summations.  
 19 THE COURT: Yeah. Well, look, I'm going to caution  
 20 folks that everything that's in these demonstratives at this  
 21 point now should be tied to an admitted exhibit. Right.  
 22 So -- and I would recommend having the citation on the -- on  
 23 there which, you know, in my experience, there should not be  
 24 objections because at the beginning of the trial, you don't  
 25 know exactly what's going to be admitted. Now you do.

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1 MR. FARBER: I'm not talking about -- and I don't  
 2 have any need to see if they are going to use --  
 3 THE COURT: Well, what else could an objection be  
 4 if it's not based on inadmissible evidence?  
 5 MR. FARBER: Well, I mean, there can be -- they  
 6 used a whole slide deck in their opening that had -- none of  
 7 it had things that were going to be admissible evidence, and  
 8 it was argument that they were making. So there is argument  
 9 that gets put into demonstratives so --  
 10 THE COURT: Argument is okay at this level; isn't  
 11 it?  
 12 MR. FARBER: Well, yes, some argument is. Some  
 13 arguments is objectionable.  
 14 What I am saying is if there is content that's  
 15 going to be -- that they are proposing to display to the  
 16 jury that's not exhibits or transcript cites that are in  
 17 evidence, I think it ought to be shown to us in advance.  
 18 THE COURT: Well, look, I think you should be  
 19 sharing these because it's just good hygiene so that nobody  
 20 wants to be surprised with -- look, I will be very  
 21 disappointed if there are objections during closing. That  
 22 just should not happen. I don't recall a lot of that  
 23 happening during the openings. Maybe my memory is just  
 24 faulty, but I really don't want -- for this to work,  
 25 Thursday has to be clean. It has to be done in a

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1 professional way where nobody is jumping up and down. There  
 2 is no ambiguity about what's admissible. Fair argument  
 3 based on the admissible evidence. I really don't expect  
 4 objections.  
 5 And even, you know, the related-party transaction  
 6 we were talking about before, you know, it's -- you should  
 7 expect in the next iteration of the jury instructions that  
 8 all that stuff about assuming illegality or assuming that  
 9 these are related-party transactions, that's gone.  
 10 It's going to say the jury has to determine for  
 11 each one on the list is it a related-party transaction. If  
 12 it was it -- if it was a related-party transaction, was  
 13 it approved. And if it wasn't approved, was it ratified.  
 14 So there is -- each step. So for each one of those -- and  
 15 again, just -- I like the verdict form to be revised. I  
 16 don't know whether we have the wherewithal to do it so that  
 17 instead those descriptions that are in there, it has to have  
 18 a little more to tell them exactly who the alleged related  
 19 party is. But anyway, that's just what was on my mind as I  
 20 was trying to do three things at once here.  
 21 So yeah. Look, exchange them. But if you do it  
 22 the right way, there should be no objections, and I really  
 23 -- I'm hoping not to have to have intermediate something as  
 24 straightforward as this. You know, everybody knows what's  
 25 been admitted and what hasn't been. So just don't do it.

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1 MR. FARBER: Thank you, your Honor.

2 THE COURT: The short answer to your question is it  
3 should be 24 hours, and the only way to do that is to be --  
4 you know, ideally, it would be tonight; right. That's --  
5 otherwise, it's not going to be 24 hours.

6 MS. ROGERS: I think the difficulty, all the  
7 testimony isn't in yet. So I had discussed with Ms. Connell  
8 exchanging demonstratives sometime tomorrow night.

9 THE COURT: That's fine. You're saying do it.  
10 Everybody's working on them is going to be doing trial, so  
11 it's going to be late. It's just like another crummy night.

12 MR. FARBER: Ms. Connell is not here. Excuse me.  
13 I don't need to see their exhibits. It's demonstratives  
14 that I was concerned about. I'm not going to object to any  
15 exhibits that they put into evidence. It's all designed to  
16 avoid making objections during summation, but that's the  
17 only reason I bring it up.

18 THE COURT: I guess I'll say again. Maybe and  
19 hopefully you just to be do unto others as you would have  
20 them do unto you. You are both facing the same thing.  
21 There is not a lot of time. So it's going to be exchanged  
22 the night before, and you're going to have to make a quick  
23 decision. You can't assume I'm going to be sitting at home  
24 waiting until two in the morning or at all to mediate  
25 disputes because there shouldn't be any. If there are, then

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1 somebody is doing something sort of odd which I don't  
2 expect.

3 All right. I'm going to now try to get you the  
4 jury instructions, at least Version 2.0, and hopefully final  
5 or near final, and I don't know what's going on with the  
6 verdict forms because my team has been working on them, and  
7 I haven't really seen a draft yet, so I'm going to try to  
8 see how far I can get on that as well.

9 All right. See you tomorrow.

10 (Whereupon at this time the trial was continued  
11 until February 14, 2024.)

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