

# EXHIBIT 5

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

-----X

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

Plaintiff,

-against-

INDEX NO.  
451625/20

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

Defendants.

-----

JURY TRIAL  
60 Centre Street  
New York, New York  
February 8, 2024

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

APPEARANCES:

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

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

NYAG v  
NRA

February 8, 2024

Proceedings Page 3730

1 THE COURT: Good morning everyone. Just a head's  
 2 up, if there is something I need to read and it's coming in  
 3 really late at night, send it to the chamber's email also  
 4 because I received those slides as I was walking downstairs  
 5 because they weren't -- they didn't go to me.  
 6 So I don't know whether there are any continuing  
 7 issues with the slides.  
 8 MR. CONLEY: Yes, your Honor, we do still have  
 9 issues with the Mehta slides.  
 10 While the NRA did scrub references to Aronson from  
 11 the slides that we discussed yesterday, the slides --  
 12 specifically slides 11, 12 and 16, they are still describing  
 13 work that Aronson and -- Aronson performed and that Mr.  
 14 Mehta did not, and we have a concern that this is  
 15 essentially vouching for work that Aronson -- Aronson  
 16 completed.  
 17 And I also just want to note that the witness NRA  
 18 intends to call after Mr. Mehta, Mr. Blacker, we have the  
 19 same concerns about the demonstratives for him. There are a  
 20 couple of slides that are just describing the procedures  
 21 that Aronson performed.  
 22 MS. ROGERS: Your Honor, we definitely aren't  
 23 intending to use either of those experts to simply rehash  
 24 what the Aronson fact witness already testified to nor would  
 25 that be a valuable use of our time, but the idea that the

Proceedings Page 3731

1 Plaintiff can offer two experts who opine on what the audit  
 2 doesn't mean, that just because they got clean audits, the  
 3 jury shouldn't credit reliance on those and that the  
 4 pretense that they can have experts refer to Aronson and how  
 5 those findings can and can not be interpreted without us  
 6 offering experts touch on the same issues is unsupported by  
 7 law or common sense.  
 8 These are financial experts, and we had Mr.  
 9 Sullivan an economist who is a user of this information  
 10 testifying about how he would use it, but he was not  
 11 permitted to testify about, you know, what an auditor could  
 12 do or look at. The reason being the limits of his expertise  
 13 and the fact that his report was prepared jointly with Mr.  
 14 Blacker.  
 15 So now we have Mr. Blacker who -- that is the  
 16 second expert he just referenced whose report was likewise  
 17 not excluded. His testimony was likewise not excluded, and  
 18 it wouldn't behoove us to just have the expert get up and  
 19 say, well, you saw Aronson's documents and I saw them too.  
 20 But we have a professional non-profit auditor with decades  
 21 of experience auditing non-profits.  
 22 THE COURT: Tell me how the opinion -- how the  
 23 Aronson work plays into his opinion. Is it the basis for  
 24 his opinion? What is he --  
 25 MS. ROGERS: He mentioned the Aronson procedures

Proceedings Page 3732

1 among a list of data points that he considered when he did  
 2 his work opining on the NRA's internal controls.  
 3 THE COURT: What does that mean? Does that mean  
 4 because they issued a clean opinion, he therefore opined  
 5 that the internal controls were robust?  
 6 MS. ROGERS: So he looks into Aronson work papers.  
 7 He will talk about if I was the auditor what kind of things  
 8 would I have looked at. He disagrees with Aronson in a  
 9 couple of places.  
 10 THE COURT: Is that in his expert report?  
 11 MS. ROGERS: I don't think the disagreement is in  
 12 his expert report.  
 13 He's obviously been listening to testimony so. But  
 14 if we look at slide 9 of the demonstratives which I  
 15 apologize that your Honor is just now receiving, there is a  
 16 second bullet, and this is an example of the kind of  
 17 testimony the jury will hear. Related-party transactions  
 18 appear appropriately handled, an opinion I reached based on,  
 19 and he lists a bunch of things, none of which are Aronson.  
 20 And then he also says at the end, Analyzing the  
 21 outside auditor's work papers, I also noted procedures  
 22 confirming, you know, what I saw. And again, you know, both  
 23 of Plaintiff's experts touched on Aronson and what they  
 24 thought about -- what they thought it could mean and what  
 25 they thought it didn't.

Proceedings Page 3733

1 We heard Mr. Tenenbaum testify, you know, just  
 2 because a non-profit gets clean audits doesn't mean that the  
 3 directors can content themselves with the state of controls.  
 4 And here we have an auditor saying when I come in  
 5 and look at a company, here's the kind of things I would  
 6 look at to reach a clean audit. Here's the kind of  
 7 documents and data that I looked at the NRA to form the view  
 8 that as an auditor could rely on these controls, and I  
 9 wouldn't be blind to what the other auditor did. I looked  
 10 through all their work papers. That's something I would  
 11 consider.  
 12 THE COURT: Well, looked through all their work  
 13 papers and rendered an independent view or just is saying  
 14 they did a good job?  
 15 MS. ROGERS: He is not just saying they did a good  
 16 job. He is rendering an independent view as we tried to  
 17 make clear in these slides, and I think part of the issues  
 18 we had was just the demonstratives.  
 19 If you actually look at his report, he is saying  
 20 here's what the professional standards require. Here's how  
 21 I am applying them, and here's how Aronson applied them.  
 22 And we have distilled the slides to focus on, you know,  
 23 here's how I am applying them.  
 24 THE COURT: So offering an opinion as to what a  
 25 clean audit opinion means?

NYAG v  
NRA

February 8, 2024

Proceedings Page 3734

1 MS. ROGERS: So I do intend to ask just as  
 2 Plaintiff asked Mr. Tenenbaum and Mr. Hines, you know, what  
 3 can you take and not take from a clean financial audit.  
 4 I do intend to ask our auditor and forensic  
 5 accountant a couple of questions that are similar, but the  
 6 meat of his opinion -- of Mr. Mehta's opinion is summarized  
 7 on slide 3 titled, "Summary of Opinions." And it's  
 8 basically -- it's core merits stuff, not sort of meta  
 9 opinions about Aronson.  
 10 I think that talking about how you interpret  
 11 financial audit findings is certainly within the scope of  
 12 the expert testimony.  
 13 THE COURT: All right. Well, this has been cleaned  
 14 up, it seems to me anyway, the summary of opinions.  
 15 I guess the question is whether the -- when you get  
 16 to the basis for each one, is that his work or is it him  
 17 saying to them, well, you've already heard that they did an  
 18 audit. It sounds like you're on top of this.  
 19 Look, this is not one that's easy to micromanage  
 20 nor is that typically my job in advance. I will see what it  
 21 comes in like. I don't -- I think that the -- sort of the  
 22 most obvious material has been removed, and you know, it's a  
 23 combination of cross-examination material which is not  
 24 something that would cause me to strike either the expert or  
 25 all these things. So I don't see anything in the slides

Proceedings Page 3736

1 yesterday.  
 2 THE COURT: Yeah. I forgot about that.  
 3 MR. FARBER: I was told I would, but we didn't.  
 4 THE COURT: Do the best you can, and I told the  
 5 jurors it was four trials. For me, it's one, and I have to  
 6 give one set of instructions. And it's -- you know, it's in  
 7 your own interests to make your filings easier for me to  
 8 digest.  
 9 MR. FARBER: I agree with that, your Honor, and we  
 10 are endeavoring to do that.  
 11 THE COURT: Yours were in the first round of 260  
 12 pages. Yours were the only ones that were relatively  
 13 concise. So hopefully, they will listen to some of your  
 14 ideas.  
 15 MR. CORRELL: Your Honor, may we -- may I have  
 16 until tomorrow morning at 10:00 a.m. to get our comments to  
 17 you because I can't do two things.  
 18 THE COURT: Well, with the following caveat. It  
 19 means that I won't read them because I'm going to be in  
 20 hearings every minute of tomorrow until 3:00.  
 21 MR. CORRELL: Is there a drop-dead time for you,  
 22 your Honor? Because I'm happy to work all night if I need  
 23 to, but if there is some -- it's going to be impossible for  
 24 me to start until the end of the day.  
 25 THE COURT: Well, I mean, do the best you can.

Proceedings Page 3735

1 that jumps out at me, but I'll be listening. And you know,  
 2 the appropriate -- you know, I think it is -- if something  
 3 came up during trial that was not necessarily in the -- in  
 4 either expert's report but just part of the back and forth,  
 5 I think your expert can comment on it, but as long as it's  
 6 not a new opinion.  
 7 MS. ROGERS: I understand.  
 8 MR. FARBER: With respect to the jury charge, I  
 9 know your Honor in what you've sent called upon the Defense  
 10 to submit a combined set of comments.  
 11 As you noted, there are four separate trials going  
 12 on here. I have no ability to compel the NRA to work  
 13 cooperatively. They said they would provide us with a draft  
 14 yesterday which they haven't, so I'm going to need to  
 15 prepare my own set of comments because I need to provide  
 16 them to the Court. So I just wanted to alert your Honor.  
 17 THE COURT: Well, look, I'm hopeful that you can at  
 18 a minimum fold them into a single document by whenever, you  
 19 know, Thursday so that, you know, literally if it's just  
 20 cutting and pasting to say here's Mr. Phillips on this and  
 21 here's Mr. Phillips on that just to avoid the juggling  
 22 process -- physical juggling of trying to figure out who is  
 23 saying what.  
 24 MR. FARBER: I understand. I will provide that to  
 25 the NRA -- today is Thursday which I had hoped to get this

Proceedings Page 3737

1 I'll try to either read it on my commute or -- I don't know  
 2 what it's going to look like. So I guess what you're saying  
 3 is yours is also not going to be folded into whatever I get  
 4 from the other defendants.  
 5 MR. CORRELL: I have sent my comments to the NRA  
 6 and asked that they be included. I'm not sure if they will  
 7 be, and if not, I will have to do a separate set.  
 8 THE COURT: Just so it's clear, that shouldn't  
 9 happen in the sense that if there is something that you  
 10 submit as your position it should just be inserted as you  
 11 have done in the past as Mr. LaPierre's separate position.  
 12 I'm just trying to have a one document or two  
 13 document that I can balance. Four is a little harder.  
 14 MR. CORRELL: I understand, your Honor, and our  
 15 position is a little different from the NRA's.  
 16 THE COURT: I get it, but it can be in the same  
 17 piece of paper. I didn't give you a page limit.  
 18 MS. ROGERS: We have no problem putting one party's  
 19 position in different color text or something like that. We  
 20 just weren't able to get a draft out yesterday.  
 21 THE COURT: Look, I didn't give you a lot of time.  
 22 I tried as best I could, but I'm doing things during the  
 23 week also. So do the best you can.  
 24 If -- I would appreciate it if it could be in a  
 25 single document, even if it's maybe not coordinated as well

NYAG v  
NRA

February 8, 2024

Proceedings Page 3738

1 as we might if you had a few more days just so I can during  
 2 the commute, if that's where I'm reading it, I don't have to  
 3 take an entire train car up with balancing them. Okay.  
 4 MR. CORRELL: Understood, your Honor. Thank you.  
 5 THE COURT: All right. All right. Let's get the  
 6 jury.  
 7 I will have an hour in the morning to look at  
 8 things.  
 9 MR. CORRELL: I would encourage everyone to get it  
 10 in earlier, but that's nice to have an escape belt if we  
 11 need to.  
 12 THE COURT OFFICER: All rise. Jury entering.  
 13 (Whereupon, at this time the jury entered the  
 14 courtroom.)  
 15 THE COURT: Welcome back, everyone. Please have a  
 16 seat.  
 17 Is the next witness for the Defense available?  
 18 MS. ROGERS: Yes, your Honor. The NRA calls Amish  
 19 Mehta.  
 20 THE COURT: Good morning.  
 21 A M I S H M E H T A, a witness called on behalf of  
 22 the Defendant, after having been first duly sworn, took the  
 23 witness stand and testified as follows:  
 24 THE CLERK: State your name.  
 25 THE WITNESS: Amish Mehta, A-M-I-S-H; last name

Mehta - by Defendant - Direct/Ms. Rogers Page 3740

1 I also spent a number of years at the firm  
 2 Pricewaterhouse, another one of the Big Four firms, and again,  
 3 specializing in non-profit organizations.  
 4 Since then I have joined a firm called Friedman, LLP to  
 5 head up their not-for-profit practice. So fairly small mid-size  
 6 firm, and it grew over the years. And in September of 2022,  
 7 Friedman merged into the national firm of Marcum, LLP and that's  
 8 where I made my current role as the New York metro non-profit  
 9 insurance leader.  
 10 So over my career, in addition to specializing in  
 11 non-profit organizations, I have also taken on other special  
 12 projects.  
 13 So one of the things that accounting firms have to do  
 14 is as part of being able to perform audits of any organization  
 15 for that matter, they are subject to what's called the peer  
 16 review by the American Institute of Certified Public  
 17 Accountants, and that process takes place every three years.  
 18 And so what happens there is a firm -- similar size  
 19 firm would go into another firm and obtain a sample of financial  
 20 statement audits that they have issued, look at their work  
 21 papers and come to some conclusion is that firm complying with  
 22 professional standards in rendering and performing their audits.  
 23 So I -- my firms over the years have participated in  
 24 that process where I have gone into other firms and performed  
 25 these peer reviews and been able to look at their work papers

Mehta - by Defendant - Direct/Ms. Rogers Page 3739

1 M-E-H-T-A.  
 2 THE CLERK: Thank you. You may be seated.  
 3 MS. ROGERS: Could I trouble the court officer to  
 4 give the witness the Power Point clicker.  
 5 Q Please introduce yourself to the jury.  
 6 A Sure. My name is Amish Mehta. I am an engagement  
 7 partner and the New York metro non-partner insurance leader for  
 8 the accounting firm Marcum, LLP.  
 9 I graduated from New York University with a Bachelors  
 10 of Science in Accounting, and I have been a Certified Public  
 11 Accountant since 1993.  
 12 So in my role at Marcum, I exclusively work with  
 13 non-profit organizations. I spend 100 percent of my time  
 14 working with different non-profit organizations. And over my  
 15 career, I have worked on organizations similar to the NRA.  
 16 So I started my career in 1991 with the firm called  
 17 KPMG. It's one of the firms known as one of the Big Four firms.  
 18 I spent a number of years --  
 19 MR. ROGERS: The witness is a native New Yorker. We  
 20 can tell. He talks fast, and it's his first time  
 21 testifying. So the court reporter has to write down  
 22 everything you say.  
 23 A So I graduated in '91, as I mentioned. I started my  
 24 career at KPMG. That's where I grounded my fundamentals in  
 25 not-for-profit accounting.

Mehta - by Defendant - Direct/Ms. Rogers Page 3741

1 and to be able to draw conclusions as to did they perform the  
 2 audits that I was looking at, and in my particular example,  
 3 performed their working in accordance with professional  
 4 standards.  
 5 In addition to that, most of the firms have an internal  
 6 inspection process that they typically go through as well. So  
 7 your colleagues would come in and look at the work that you have  
 8 done, and that happens periodically. Similar fashion.  
 9 They would follow the AICPA checklist similar to a peer  
 10 review, but you are looking at your own firm's work that another  
 11 colleague of yours has performed.  
 12 So based on those, the experience that I have with  
 13 performing internal inspections as well as peer reviews, I am  
 14 able to review the work of other auditors and be able to draw  
 15 conclusions based on the work that they have done.  
 16 In addition, over my career, I have also been a Board  
 17 member of a --  
 18 MR. CONLEY: Objection. Narrative.  
 19 THE COURT: It was kind of a long answer to please  
 20 introduce yourself to the jury. Maybe we can do it more  
 21 traditionally.  
 22 Q All right. We can break this up a little bit.  
 23 Mr. Mehta, you mentioned applying the standards of an  
 24 organization called the AICPA.  
 25 What is that?

NYAG v  
NRA

February 8, 2024

Mehta - by Defendant - Direct/Ms. Rogers Page 3742

1 A The American Institute of Certified Public Accountants.  
 2 Q And before we get to your non-profit personal  
 3 experience, I do want to ask about a couple of things you just  
 4 mentioned in your introduction.  
 5 We have heard testimony, and you have been listening to  
 6 testimony in this case the past couple of days; right?  
 7 A Correct.  
 8 Q And you have reviewed transcripts and reports from  
 9 other experts; right?  
 10 A That's correct.  
 11 Q We heard testimony from an accountant Ms. Cullen who  
 12 works on the tax side, and we heard testimony from Mr. Plotts  
 13 who works on the audit side of the NRA engagement; right.  
 14 You are an engagement partner. Can you explain to the  
 15 jury how the engagement partner is situated vis a vis tax and  
 16 audit?  
 17 A Certainly. So I am the engagement partner on the  
 18 audits that I have relationships with. So I have overall  
 19 responsibility for all services that are delivered to my  
 20 clients. That would include the audit service, the tax services  
 21 and any advisory services that the client has requested.  
 22 So I would work with our tax directors similar to Ms.  
 23 Cullen who would be responsible for preparing the Form 990, that  
 24 individual and their team, but I would have ultimate  
 25 responsibility for the tax services that are delivered to the

Mehta - by Defendant - Direct/Ms. Rogers Page 3744

1 A Sure. I have served on Boards of non-profit  
 2 organizations initially as a Board member, and then I spent two  
 3 years as the treasurer of a non-profit organization, so I am  
 4 able to see, kind of wear two hats. And again, my testimony,  
 5 one that is an auditor for financial statements, but also a  
 6 Board member understanding my fiduciary responsibility as a  
 7 Board member knowing the things that I requested from the  
 8 accounting firm that, for example, worked on the audit of the  
 9 organization that I was on the Board of, the questions that I  
 10 would ask my fellow Board members and management, in fact, you  
 11 know, to carry out my fiduciary obligations as a Board member.  
 12 Q What were you asked to do in this case?  
 13 A So I was asked to provide expert witness testimony.  
 14 Q Is the clicker working? Okay. He is not an expert on  
 15 this, and it's not his fault either. There we go.  
 16 So you were asked to give opinions and testimony on --  
 17 sorry. Go ahead.  
 18 A Sorry. So yes, so I was asked to review the  
 19 documentation from the -- review the first complaint, the  
 20 amended complaint, second amended complaint, review the  
 21 testimony, various documentation, policies and procedures and  
 22 the like in order to provide my expert opinion on the financial  
 23 reporting practices of the NRA, their internal controls and  
 24 their commitment and then compliance with good corporate  
 25 governance.

Mehta - by Defendant - Direct/Ms. Rogers Page 3743

1 client and would review the 990 prior to the issuance to the  
 2 client.  
 3 Q But you don't work at Aprio or Aronson with Ms. Cullen  
 4 and Mr. Plotts.  
 5 A That's correct.  
 6 Q You are an expert witness, and you're being compensated  
 7 for your testimony; right?  
 8 A That's correct.  
 9 Q Are you being compensated based on what you say?  
 10 A No.  
 11 Q When the NRA hired you and agreed to pay you, did it  
 12 know what conclusions you would come to as far as you're aware?  
 13 A It did not.  
 14 Q As far as you're aware -- and is your firm being  
 15 compensated for this work at the same rate it would be  
 16 compensated if you were doing regular accounting work?  
 17 A That's correct. For similar work.  
 18 MS. ROGERS: I offer Mr. Mehta as an expert in  
 19 non-profit accounting and auditing.  
 20 MR. CONLEY: No objection.  
 21 THE COURT: Okay. He is admitted for that purpose.  
 22 Q Mr. Mehta, you mentioned that you also served on  
 23 non-profit Boards.  
 24 A That's correct.  
 25 Q Tell the jury about that.

Mehta - by Defendant - Direct/Ms. Rogers Page 3745

1 Q Yesterday you heard Greg Plotts testify about how  
 2 auditors have to be independent.  
 3 Do you recall that?  
 4 A I do.  
 5 Q Can you describe whether or to what extent that  
 6 standard applies to you?  
 7 A Certainly. So again, under the AICPA, we are bound to  
 8 the independent standards of AICPA in fact and appearance.  
 9 So what does that mean?  
 10 So we are prohibited from having any type of business  
 11 relationships with the client that we audit. We can't have an  
 12 ownership interest in any client that we audit. We can not have  
 13 relationships -- for example, I can not have a spouse that's the  
 14 CFO of an organization that we audit. So those are types of --  
 15 and then when I mentioned appearance, if there is any doubt that  
 16 someone could potentially say that you have an independence  
 17 problem even though in reality there might not be one, we are  
 18 really precluded from carrying out that particular transaction.  
 19 So even though the underlying foundation may not be  
 20 independence violation, but because the fact it might give the  
 21 appearance that could be an independence violation, we would be  
 22 prohibited from carrying out such a transaction.  
 23 Q Have you ever been an expert witness before?  
 24 A I have not.  
 25 Q Can you summarize briefly for the jury and then we will

NYAG v  
NRA

February 8, 2024

Mehta - by Defendant - Direct/Ms. Rogers Page 3746

1 walk through them, the opinions that you reached when you looked  
 2 at these documents.  
 3 A So I was asked to -- one of the things I was asked to  
 4 do is look at and evaluate the NRA's various policies and  
 5 procedures. Specifically, a couple of key areas.  
 6 One is related-party transaction. One is whistle  
 7 blowers, and the the third being their filings with the  
 8 regulatory authorities of whether the Audit Committee of the NRA  
 9 properly discharged their responsibilities and come to some  
 10 conclusion of what my assessment was with -- related to those  
 11 particular opinions.  
 12 So with respect to conflict of interest and  
 13 related-party transactions, I have worked on hundreds of  
 14 non-profit organizations over the years and looked at conflict  
 15 of interest, and related-party transactions is a key cornerstone  
 16 of the work that we do.  
 17 So in any audit, we would ask for what is your  
 18 conflict-of-interest policy. May I see a copy of it? What is  
 19 the process that you utilize to, for example, circulate  
 20 related-party questionnaires or conflict-of-interest  
 21 questionnaires on an annual basis to all Board members, officers  
 22 and senior management.  
 23 THE COURT: Just are you now moving on from the  
 24 summary to now -- I'm just trying to --  
 25 Q I think -- why don't we talk -- before we get into the

Mehta - by Defendant - Direct/Ms. Rogers Page 3748

1 witnesses about a concept called "materiality," and you used  
 2 that concept in your work; right?  
 3 A That's correct.  
 4 Q Can you tell the jury what that means from a financial  
 5 perspective and in layman's terms?  
 6 A Certainly. I recall Sonya Rowling testify in terms of  
 7 the size of the NRA.  
 8 When I looked at the financials from '15 to '21, and  
 9 just to get an overview of the size and depth and breadth of the  
 10 organization, you can see that the NRA's, you know, transactions  
 11 run at hundreds of millions of dollars. And in addition, the  
 12 NRA's a complicated organization in the sense that they have  
 13 multiple entities; right. So they have separately incorporated  
 14 entities that carry out different purposes.  
 15 You've heard the NRA being what's called a (c)(4)  
 16 organization which is the advocacy organization. You have heard  
 17 that they have a (c)(3) organization which is the foundation  
 18 that carries out different charitable activities. So they have  
 19 multiple organizations that have been established to carry out  
 20 various purposes, and those organizations are consolidated from  
 21 a financial reporting purposes into what's called consolidated  
 22 financial statements.  
 23 So someone takes several or multiple different trial  
 24 balances, ledgers and pulls out information together to give you  
 25 an overall picture of the total organization.

Mehta - by Defendant - Direct/Ms. Rogers Page 3747

1 meat of your opinions, let's talk about what you're basing them  
 2 on, and I think that should be your next slide.  
 3 A So one of the key concepts that you may have heard --  
 4 Q I think we skipped a slide.  
 5 THE COURT: He is back now.  
 6 Q Sorry. There we go.  
 7 A So the items that I looked at in coming and forming  
 8 conclusions and my opinions are I looked at the allegations that  
 9 the NYAG office has made with respect to the NRA. So I looked  
 10 at the second amended verified complaint. I looked at the  
 11 various subpoenas that were produced by the various parties and  
 12 the witnesses during the litigation. I reviewed policies and  
 13 procedures, the conflict-of-interest policy, the whistleblower  
 14 policy, the employee handbook, their corporate governance  
 15 policies.  
 16 I looked at the -- Aronson's work papers, for example.  
 17 I looked at the depth and breadth that they did their work and  
 18 the areas that they looked at specifically as it relates to what  
 19 the opinions that I'm forming. I looked at the Bylaws, the  
 20 employee handbooks. I looked at the compliance and governance  
 21 refresher seminars. I looked at the Audit Committee, the  
 22 meeting -- the minutes of the Audit Committee meetings. So I  
 23 looked at a whole -- in addition to also consulting  
 24 professionally accounting guidelines in forming my opinions.  
 25 Q All right. We have heard from a few different

Mehta - by Defendant - Direct/Ms. Rogers Page 3749

1 So when you take an organization like the NRA, the  
 2 concept of materiality is the under -- is the undertone of the  
 3 work that we as auditors do.  
 4 So when we render an audit opinion, we are not saying  
 5 that the financial statements are 100 percent accurate. What we  
 6 are saying is that the financial statements are fairly presented  
 7 in accordance with generally accepted accounting principles,  
 8 that they are materially stated correctly.  
 9 So when we talk about that it's possible that you can  
 10 -- you could have an error, for example, ranging in the hundreds  
 11 of thousands, but that would not prevent an auditor from  
 12 rendering what's called an unmodified opinion or a clean opinion  
 13 on those financial statements.  
 14 So from a materiality standpoint, it's one of the  
 15 concepts that you have to look at when you evaluate the  
 16 financial statements of any organization.  
 17 Q And if we move ahead. Now that we have talked about  
 18 how accountants calculate materiality, how would you think about  
 19 it as a layman and how did you think about it when you were on a  
 20 not-profit Board?  
 21 MR. CONLEY: Objection to leading, your Honor.  
 22 THE COURT: Also, his -- he is testifying as an  
 23 accounting expert, not as an expert in director's duties.  
 24 MS. ROGERS: That's fair. I did also say as a  
 25 layman. I don't know if he is allowed to give lay testimony

NYAG v  
NRA

February 8, 2024

Mehta - by Defendant - Direct/Ms. Rogers Page 3750

Page 3752

1 at the periphery of his expert testimony.

2 THE COURT: Materiality is an accounting principle

3 which is that's what he is here for, but he can explain it

4 to the jury in layman's terms.

5 Q Can you explain to the jury in layman's terms?

6 A Certainly. So in layman's terms, materiality as this

7 slide indicates, it's where are the financial statements

8 misstated to the point where a user of a financial statement

9 would come to a different conclusion, you know, had an error not

10 been present.

11 So if you talk about the NRA and you're talking about

12 revenues of three to \$400 million, if the revenues were off by

13 let's say a million dollars, would that cause you to come to a

14 different conclusion than if that error was not present.

15 You heard Mr. Plotts testify that, you know, we also

16 look at materiality in a qualitative manner. So if that million

17 dollars would have changed the debt covenant in where there

18 would have been default of their debt covenant, from a

19 qualitative standpoint, yes, that would be material. So you

20 have got to take a look at materiality from a quantitative as

21 well as a qualitative standpoint.

22 Q Let's talk now about the specific opinions that you've

23 reached, and I'd like to direct you back to the discussion about

24 related-party transactions.

25 Can you explain to the jury the opinion you reached

1 address those particular conflicts that may have been mentioned.

2 In addition, what type -- what does the organization do

3 to communicate that policy and what do they do to insure that

4 individuals are following through on that policy.

5 So the NRA, for example, I looked at a number of these

6 governance and compliance seminars that I believe you have seen

7 from different experts along the trial. And in those seminars,

8 there is a constant focus on insuring that the Board members as

9 well as members of senior management understand and know how --

10 what a potential conflict could look like, how to identify, what

11 is the reporting mechanism once you have identified such a

12 conflict and then, you know, what's the protocol for handling

13 those types of conflicts.

14 So I looked at all of those factors in determining that

15 the NRA does have a robust conflict-of-interest policy process

16 in place.

17 (Continued on the following page.)

18

19

20

21

22

23

24

25

Mehta - by Defendant - Direct/Ms. Rogers Page 3751

Mehta - by Defendant - Direct/Ms. Rogers Page 3753

1 about the NRA's controls on related-party transactions and walk

2 the jury through the basis for your opinion.

3 A Certainly. So as I mentioned earlier, when we look at

4 conflict of interest and related-party transactions, we ask for

5 a number of items when we are performing a financial statement

6 audit. So one being that does the organization have a

7 conflict-of-interest policy.

8 In my experience having served on audits of hundreds of

9 non-profit organizations, I'm familiar with -- I can distinguish

10 between what's a fairly robust policy versus one that's lacking

11 in some key principles that I would expect to see in a policy.

12 So that's one area that we looked at.

13 Also, do they obtain conflict-of-interest statements

14 from their Board members, officers and senior management

15 typically on an annual basis? So does that process take place?

16 Who is in charge of that process? How are the results of those

17 questionnaires handled and disseminated to the Board and other

18 members of governance?

19 And then also how is that process documented. I would

20 expect to see that process documented in the minutes of the

21 audit committee's meetings that, you know, conflict-of-interest

22 policy statements were circulated. These were the results that

23 were -- that we obtained. These were the conflict -- potential

24 conflicts that were reported to the -- within this particular

25 case, the Office of General Counsel, and how are we going to

1 Q Let's move ahead and talk a little bit about those

2 seminars.

3 You said you've audited hundreds of not-for-profits in

4 your career. How would you compare the NRA's seminar conflict

5 education program to most of not-for-profits you've seen?

6 A It's certainly more robust than many of my existing

7 clients. Most of my clients do have a conflict-of-interest

8 policy in place -- I mean, all of my clients have a

9 conflict-of-interest policy in place. They do circulate

10 conflict-of-interest questionnaires to board members, members of

11 senior management and officers. They disseminate those results

12 and discuss those within the board.

13 But I don't recall any of my existing clients doing

14 these types of seminars or a constant training on a periodic

15 basis to those constituents and ensure and reinforce that

16 there's a policy in place and what is the protocol for adhering

17 to the policy, and what happens if you have a potential conflict

18 that you want to report.

19 So, certainly, the NRA has a more robust policy in

20 place.

21 Q Mr. Mehta, I want to situate your analysis on a

22 timeline. When you were analyzing NRA's conflict policies and

23 its other documents and practices, did you look at the NRA

24 before or after the attorney general's lawsuit?

25 A So, the years of my -- the focus of my analysis related

NYAG v  
NRA

February 8, 2024

Mehta - by Defendant - Direct/Ms. Rogers Page 3754

1 to 2019 and 2020.  
 2 Q So before and after?  
 3 A That's correct.  
 4 Q Let's talk about -- well, strike that.  
 5 You mentioned that a financial statement can be off by  
 6 a million dollars and if it's a billion dollar company that  
 7 might or might not be material. Separate from those kinds of  
 8 misstatements, are auditors required to look -- are auditors  
 9 like you required to look at related-party transactions  
 10 specifically?  
 11 A Yes. I mean, we're -- again, we're required to look at  
 12 related-party transactions. So, typically, what we'll do is  
 13 obtain -- we'll we ask management for a listing of their  
 14 related-party transactions. So, we'll say can you provide us  
 15 with a list of your related-party transactions, and we'll go  
 16 through those and test those transactions to ensure that, one,  
 17 they were reviewed, they were approved. That they appear to be  
 18 have been carried out as arms-length transactions similar to  
 19 what the organization would obtain if they had gone out into the  
 20 marketplace for similar goods or services.  
 21 And then we would maintain a heightened level of  
 22 professional skepticism so that as we're carrying out our work,  
 23 if we happen to notice a payment made to a vendor, for example,  
 24 that we recall seeing it on a related-party questionnaire that  
 25 was disclosed as a related-party, we want to make sure that

Mehta - by Defendant - Direct/Ms. Rogers Page 3755

1 particular transaction appeared on the related-party transaction  
 2 list that we obtained from the client.  
 3 Q You talked about analyzing whether the company is  
 4 getting the same terms from a related party that it would get if  
 5 it went out into the marketplace.  
 6 Can you talk a little bit more about that analysis?  
 7 A Certainly. So, in looking at the related-party  
 8 transactions, we would do an assessment to determine whether,  
 9 again, those transactions were arm's length.  
 10 Again, drawing on our professional experience, if we  
 11 see that there's a transaction that causes a cause for concern,  
 12 we would certainly go out --  
 13 MR. CONLEY: Objection, your Honor. This is  
 14 outside the scope of his report. Mr. Mehta didn't perform  
 15 the analysis.  
 16 MS. ROGERS: There's an entire section in his  
 17 report.  
 18 THE COURT: Right now he's just talking about what  
 19 he would do in an audit of a different company. We haven't  
 20 really gotten to any of his opinions about whether he did  
 21 any of this for the testimony about this case, yet.  
 22 Q Mr. Mehta, let's talk about what you looked at in this  
 23 case in reaching your opinion of the NRA was robustly handling  
 24 related-party transactions, what items did you analyze?  
 25 A So, again, I analyzed -- as I mentioned -- the Audit

Mehta - by Defendant - Direct/Ms. Rogers Page 3756

1 Committee reports. I also looked at as I mentioned their  
 2 conflict-of-interest policies and procedures. I looked at the  
 3 questionnaires. I obtained a list of questionnaires for  
 4 particular years that were my areas of focus and emphasis.  
 5 I looked at the -- the auditor financial statements, so  
 6 I think that's one area I want to talk about.  
 7 So, it's Generally Accepted Accounting Principles of  
 8 the Financial Accounting Standard Board is the body that  
 9 promulgates accounting principles, so that's the FASB, F-A-S-B.  
 10 The American Certified Public Accountants promulgates  
 11 the audit standards for auditors when we carry out our  
 12 procedures. It is the AICPA. It is the AICPA that promulgates  
 13 the audit standards in terms of how the auditors carry out their  
 14 procedures.  
 15 So, the disclosures that go into the financial  
 16 statements are promulgated by the FASB under Generally Accepted  
 17 Accounting Principles, and it's management that's responsible  
 18 for the financial statements. The auditors are not responsible  
 19 for the financial statement. The only thing that belongs to the  
 20 auditors is that one 2-to-3 page opinion at the beginning of the  
 21 financial statement that says we have audited.  
 22 That's the report that belongs to the auditors; but the  
 23 financial statements and the notes to the financial statements  
 24 belong to the management.  
 25 So, it's management that makes the disclosure of the

Mehta - by Defendant - Direct/Ms. Rogers Page 3757

1 related-party transactions in the financial statements. That's  
 2 one of the requirements if you have related-party transactions,  
 3 that you must disclose -- you must have some level of disclosure  
 4 about the related-party transactions. So, when I reviewed the  
 5 NRA's financial statements, it is clear that there is reference  
 6 to the fact that there are related-party transactions with board  
 7 members and other insiders.  
 8 So, when the Aronson firm looked at the financial  
 9 statements, they concurred that, for example, and I felt that  
 10 the related-parties disclosure were also appropriate in terms of  
 11 the NRA had put forth.  
 12 The other thing I also looked at was Form 990, and kind  
 13 of backing up a little bit. So the reader knows that there are  
 14 related-party transactions, they can always ask the NRA can we  
 15 get more information on what those related-party transactions  
 16 are. If you go to the Federal Form 990, the Form 990 goes into  
 17 much, much more detail about related-party transactions.  
 18 So, if you take a look at the financial statements,  
 19 that will cue you that there are related-party transactions with  
 20 the organization; and if you go to the 990, it will give you a  
 21 lot more detail as to what those related-party transactions are.  
 22 Q Thank you.  
 23 A So, combination of all those documents.  
 24 MR. CONLEY: Objection, narrative answer.  
 25 THE COURT: Yeah, it might be better to do question

NYAG v  
NRA

February 8, 2024

Mehta - by Defendant - Direct/Ms. Rogers Page 3758

1 and answer format.  
 2 MS. ROGERS: Okay.  
 3 Q Mr. Mehta, I'll try to ask slightly narrower questions.  
 4 Did you look at the tools and rules the NRA has in  
 5 place to make sure information about these transactions filters  
 6 where it can be disclosed?  
 7 A I did.  
 8 Q Let's talk about what you found narrowly.  
 9 A Collectively, when I looked at the different tools that  
 10 I described in my testimony, I formed the conclusion that the  
 11 NRA in fact does have robust conflict-of-interest and  
 12 related-party transactions process where the transactions that  
 13 it engages in that are deemed to be related party have been  
 14 disclosed in their financial statements as well as their Federal  
 15 Form 990 and have been documented in their Audit Committee  
 16 meeting minutes.  
 17 Q Do you have a few more slides on what you looked at at  
 18 the accounting standards that you applied?  
 19 A So, this is an example for a -- it's an example of  
 20 related party financial disclosure question, FDQ, that the NRA  
 21 circulates to board members and members of senior management.  
 22 This is -- there's actually two pages missing. It is a  
 23 five-page document. Most of my clients would typically have a  
 24 two pager, for example, for their related-party transactions  
 25 conflict-of-interest questionnaire. In NRA's case, it is a

Mehta - by Defendant - Direct/Ms. Rogers Page 3759

1 five-page document. It is extremely robust in terms of the  
 2 types of transactions that it inquires about.  
 3 And, certainly, there's space on the forms to provide  
 4 further detail if you answered yes to any of the questions that  
 5 are asked on the questionnaire.  
 6 Q All right, and let's talk a little more just briefly  
 7 because I know you've already gotten into this somewhat about  
 8 what accountants and auditors like you do when you dig into this  
 9 issue?  
 10 A So, we -- we go through the process of evaluating the  
 11 client's related-party transactions. As I mentioned earlier, we  
 12 look at the policy. We look at the process that they utilize to  
 13 educate the board and members of the senior management about the  
 14 policy. We also look at the results of the questionnaires.  
 15 We maintain a heightened level of skepticism and  
 16 professionalism to the extent that we uncover any transactions  
 17 that have not been reported by the members of the board or  
 18 members of senior management in order to come to conclusions,  
 19 and should there be any issues or concerns we would certainly  
 20 communicate them in what we call a management letter to those  
 21 with charge with governance indicating any issues we found in  
 22 performing our work.  
 23 Q You heard Mr. Plotts testify about doing something  
 24 called testing, testing related-party transactions.  
 25 Can you tell the jury what that means?

Mehta - by Defendant - Direct/Ms. Rogers Page 3760

1 A Certainly. So, as I mentioned we would obtain a  
 2 listing of related-party transactions from management, and we  
 3 would obtain those transactions and then we would pick a sample  
 4 of those transactions and vouch them to the underlying  
 5 transactions, supporting documentation, were there review and  
 6 approval processes in place for the transaction and also look at  
 7 the Audit Committee minutes to see if that transaction was  
 8 discussed and deliberated in the minutes of the meeting.  
 9 Q Let's talk about whistleblowers. You also looked at  
 10 the NRA's whistleblower controls; right?  
 11 A That's correct.  
 12 Q And can you tell the jury what you found and tell the  
 13 jury concisely, if you can, and then we'll go into each one, the  
 14 basis for that opinion.  
 15 A Sure. So, when I looked at the NRA whistleblower  
 16 policy, my first question was where can I find the policy. And  
 17 it's outlined in a number of areas.  
 18 So, for example, it is in their policy manual. It is  
 19 in their Employee Handbook. It is in their intranet, which is  
 20 within the company itself. If you go to the NRA external  
 21 website, you'll see a statement about whistleblower policy  
 22 directly on their website; so anybody, anyone in the world, for  
 23 example, can take a look at their whistleblower policy. It is  
 24 also embodied in their statement of corporate ethics.  
 25 Another place you can find is also another part of

Mehta - by Defendant - Direct/Ms. Rogers Page 3761

1 their compliance and governance refresher seminars that we've  
 2 been talking about. So, that's a key point in that particular  
 3 seminar where they reinforce what the policy is, and we'll go  
 4 into more detail in terms of the points that they cover in that  
 5 policy. But, again, it is embodied in those particular seminars  
 6 that are given. And then the Audit Committee and the Office  
 7 General Counsel, also what their role and responsibilities are  
 8 that relates to the organization's whistleblower policy.  
 9 Q You mentioned that your analysis covered both 2019 and  
 10 2020. Did you notice any revisions to whistleblower policy  
 11 during that time?  
 12 A I do recall seeing a document where the NRA enhanced  
 13 their whistleblower policy where they laid out more detail the  
 14 anonymity clause, and we'll talk about how they've added that  
 15 particular clause about how whistleblower claims can be made  
 16 anonymously.  
 17 Q Even before 2020, how did the NRA's whistleblower  
 18 protections compare to those you've seen in other  
 19 not-for-profits?  
 20 THE COURT: By "before" you mean 2019?  
 21 MS. ROGERS: Well, yes, so in 2019 before 2020  
 22 because his analysis covered both years.  
 23 THE COURT: Right, but when you say before, that's  
 24 a long period of time. You mean he looked at 2019?  
 25 MS. ROGERS: Right -- well, the

NYAG v  
NRA

February 8, 2024

Mehta - by Defendant - Direct/Ms. Rogers Page 3762

1 whistleblower policy, yeah.

2 Q So for the whistleblower policy you saw in 2019, the

3 one before they laid -- added more details to the anonymity

4 clause, how did that 2019 policy compare to policies that other

5 not-for-profits you audited?

6 A I found the NRA's whistleblower policy robust. When I

7 look at a whistleblower policy, we look for a couple of

8 different factors.

9 One, is that one, obviously, they have to have a policy

10 to begin with; but does their statement in there that says

11 whistleblower policies can be made anonymously.

12 MR. CONLEY: Objection, your Honor. This is

13 factual narrative and doesn't discuss any analysis MR. Mehta

14 did.

15 MS. ROGERS: He's comparing the policy to other

16 policies he looked at in his capacity as an expert.

17 THE COURT: Overruled.

18 By the way, we lost the real time completely. It

19 is going to take awhile. It already crashed. So, we're

20 just going to have to listen for awhile. Go ahead.

21 Q So, Mr. Mehta, in the documents you reviewed, did you

22 form an understanding as to whether anonymous whistleblowers

23 even before the NRA revised its policy were coming forward at

24 the NRA?

25 A That's my understanding.

Mehta - by Defendant - Direct/Ms. Rogers Page 3763

1 Q All right, let's talk about --

2 THE COURT: Okay, I -- you just asked him a factual

3 question about --

4 Q Well, what was your understanding based on?

5 A So, again, looking at Audit Committee minutes in 2019,

6 I saw evidence that whistleblowers were coming forward on an

7 anonymous basis.

8 Q And let's talk more about the technical accounting

9 standards that govern whistleblowers and why and how an

10 accountant would consider this.

11 So, are there any specific accounting standards you

12 consider in your practice that you brought to bear here on your

13 whistleblower policy analysis?

14 A Sure. So, the whistleblower policy is kind of part and

15 parcel with the auditor's responsibility for assessing fraud in

16 a financial statement audit. So, as auditors, we're not --

17 we're not performing a financial statement audit for the purpose

18 of detecting fraud, but we have to be aware that the possibility

19 of fraud exists.

20 So, that's the guidance that we look at in performing

21 with financial statement audits. So, a key cornerstone of

22 having -- a key cornerstone of minimizing the possibility of

23 fraud in an organization is having an effective whistleblower

24 policy.

25 So, if an organization has an effective whistleblower

Mehta - by Defendant - Direct/Ms. Rogers Page 3764

1 policy, that gives us comfort that the risk of fraud or that

2 minimizes the risk of fraud. It's impossible to have an

3 environment where you'll never have any fraud, right? But

4 you're always trying to minimize the risk of fraud, so having

5 effective whistleblower policy does that.

6 So, when we look at the whistleblower policy, what is

7 the policy, what is the reporting mechanism for the policy, what

8 is the -- are there -- and one of the key cornerstones is to

9 having making sure that you have anti-retaliation clauses so

10 that whistleblowers are not retaliated against if they bring

11 forward any complaints that they have.

12 And then what is a reporting mechanism? Is it -- there

13 should be a reporting mechanism directly to the Audit Committee,

14 for example, the Office of General Counsel which is the case in

15 the NRA's practices, that those matters are brought forward to

16 the Office of General Counsel and, ultimately, to the Audit

17 Committee.

18 The whistleblower matters were documented in the

19 minutes of the Audit Committee meetings as to how they were

20 addressed. So, my conclusion on the NRA's policies when I look

21 at the audit standards in terms of our response is that the NRA

22 is meeting those standards.

23 Q You mentioned looking for an anti-retaliation clause,

24 and you also mentioned looking at both the 2019 and 2020

25 versions of the NRA's policy. Focussing on the 2019 policy, did

Mehta - by Defendant - Direct/Ms. Rogers Page 3765

1 you form a view about the robustness of the NRA's

2 anti-retaliation mechanism?

3 A I did. So, I mean, that particular anti-retaliation

4 clause is present in the 2019 policy. I can see from the

5 minutes, the Audit Committee meetings that those items were

6 discussed, that whistleblower protections were offered to those

7 individuals that came forward.

8 Certainly, that's a point that's emphasized in the

9 governance and refresher seminars they offer periodically, and I

10 was comfortable with the fact that those clauses were present.

11 Q The Audit Committee meetings aren't always very

12 detailed about whistleblowers; are they?

13 A That's correct.

14 Q Did that concern you?

15 A What I look for is the fact that the item was

16 discussed. Sometimes, again, they could be very sensitive

17 matters and discussions so many times those specifics of the

18 whistleblower matters are discussed in executive session. There

19 might be confidentiality issues at hand and that, therefore,

20 you would not see the details of what investigation was

21 documented.

22 MR. CONLEY: Objection, to factual narrative, might

23 occur.

24 MS. ROGERS: He's providing an expert view on

25 whether as an auditor --

Mehta - by Defendant - Direct/Ms. Rogers Page 3766

1 THE COURT: Look, I've done this with each expert.  
 2 Experts base their or have to base their opinion on  
 3 their review of documents and the like. This is not a fact  
 4 witness. He doesn't have firsthand knowledge of what is  
 5 going on at the NRA on a daily basis. He's basing it on the  
 6 same kind of evidence that you're looking at.  
 7 So, at the end, as I said, you evaluate all the  
 8 experts; and if you consider that the factual basis that  
 9 they're using you disagree with or you think that's not  
 10 really the way it worked, you can use that in considering  
 11 with this expert or any of the experts.  
 12 So, some of the experts more frequently say  
 13 explicitly that it is based on things that they have read or  
 14 things that they have heard; but you should assume that  
 15 unless you hear otherwise, Mr. Mehta is not a fact witness.  
 16 So, he's not testifying about facts, although it  
 17 sometimes sounds like it. He's just giving you his  
 18 understanding of the evidence.  
 19 Ultimately, it is up to you.  
 20 Q Thank you, Mr. Mehta. In the Audit Committee minutes  
 21 you read that the jury is going to see, too, did you have any  
 22 concerns or opinions about the level of detail or lack of detail  
 23 concerning whistleblowers?  
 24 A I did not.  
 25 Q Can you explain to the jury how you look at those

Mehta - by Defendant - Direct/Ms. Rogers Page 3767

1 documents and how you form that opinion?  
 2 A So, as I stated earlier, I'm looking to see is there  
 3 evidence in the Audit Committee minutes that whistleblower  
 4 matters are discussed and deliberated.  
 5 That's certainly laid out in their policies and  
 6 procedures, so I'm certainly checking to see are they in fact  
 7 carrying out what they have documented to be their policies and  
 8 procedures.  
 9 So, I did see evidence in the Audit Committee minutes  
 10 that their whistleblower matters were discussed. They,  
 11 certainly, may not have gotten into detail as far as the full  
 12 extent of the investigation that was conducted; but, certainly,  
 13 there was evidence in the minutes that whistleblower matters are  
 14 being discussed.  
 15 Q All right, let's talk now about the completeness and  
 16 accuracy of the NRA's filings, and I want you to explain the  
 17 opinion you formed based on the evidence and the basis for that  
 18 opinion.  
 19 A So, as an auditor, I reviewed their financial  
 20 statements, again looking at the disclosures that were made in  
 21 the financial statements. There was nothing that jumped out at  
 22 me that wouldn't cause me concern that there were significant  
 23 disclosures that were missing or inadequate.  
 24 Just taking a step back, in New York State what's  
 25 called it's called a CHAR500 filing. So, the CHAR500 form,

Mehta - by Defendant - Direct/Ms. Rogers Page 3768

1 itself, is a fairly simple form. It asks a bunch of  
 2 administrative questions. But the crux of that filing package,  
 3 if you will, is to submit the audited financial statements  
 4 and the copy of the Federal Form 990 that accompanies the  
 5 CHAR500.  
 6 So, that forms the packet -- the reporting package  
 7 that's provided to the New York State Attorney General's  
 8 Charities bureau on an annual basis.  
 9 So, I reviewed that package, the reporting package. I  
 10 found the financial statements to be complete. There was  
 11 nothing when I reviewed those financials that caused me concern.  
 12 I, also, reviewed the Federal Form 990 for those  
 13 particular years and found them to be complete.  
 14 I, also, consulted with other experts within my firm as  
 15 a second look to see if there was anything that raised red flag  
 16 concerns to them, and they communicated back to me that there  
 17 was nothing that they saw out of the ordinary in the  
 18 organization's 990 filings.  
 19 Q All right, I think we have a couple more screens on  
 20 this, including one discussing the C-Trac software that the NRA  
 21 used to prepare its 990.  
 22 In your experience, is that a robust way in preparing a  
 23 tax form?  
 24 A So, as part of our audit and tax preparation process we  
 25 look to see what is the organization's process for preparing

Mehta - by Defendant - Direct/Ms. Rogers Page 3769

1 their financial statements as well as their Federal Form 990.  
 2 I would expect to see that there are sound, robust processes in  
 3 place in terms of review by the management.  
 4 Once those documents are ultimately prepared, the  
 5 Federal Form 990 is typically -- if we're engaged to prepare the  
 6 990, obviously, we'll do that; but in the NRA's case, they  
 7 utilized the C-Trac software to prepare their own Federal Form  
 8 990 and had utilized their external auditor in a consulting  
 9 fashion.  
 10 So, I looked at the process that the NRA undertakes to  
 11 prepare, for example, their Federal Form 990. Based on the  
 12 documents that were provided to me and testimony that was  
 13 provided by John Frazer, Sonya Rowling. I understand that  
 14 that's a coordinated effort between the office of General  
 15 Counsel, the CFO and the Financial Services Division. And they  
 16 also used outside tax counsel to review the Form 990 for  
 17 completeness. They also utilized their independent auditor,  
 18 Aronson, who provides consulting advice so if they have  
 19 questions, to answer a particular question --  
 20 MR. CONLEY: Objection, your Honor, a narrative.  
 21 The question was about C-Trac software.  
 22 MS. ROGERS: The question was completely  
 23 appropriately framed, and the witness is providing the basis  
 24 for his opinion.  
 25 THE COURT: Yeah, there's still a disconnect

Mehta - by Defendant - Direct/Ms. Rogers Page 3770

1 between the scope of questions and the scope of answers.  
 2 Direct there's a fair amount of leeway, but it's a little  
 3 hard to follow.  
 4 Q Let's go back to the C-Trac software. You would agree  
 5 with me that the C-Trac software doesn't prevent anyone from  
 6 lying on their tax return; right?  
 7 MR. CONLEY: Objection, leading.  
 8 THE COURT: Overruled.  
 9 Q It wouldn't prevent you from lying, from intentionally  
 10 concealing information; right?  
 11 A No. The C-Trac software relies on inputs; and as  
 12 testimony was given, there are crosschecks within the software  
 13 so if you answered a particular question -- I believe Ms. Cullen  
 14 talked about the governance questions. So, if you answered yes  
 15 on a particular question, it would prompt you that you must fill  
 16 out a supplemental schedule. So if you failed to fill out a  
 17 supplemental schedule, the software would not let you validate  
 18 the tax returns.  
 19 So, by itself, it wouldn't allow any type of lying.  
 20 Q Now, you had a slide earlier about how a form can be  
 21 inconsistent without being it from an audit perspective  
 22 materially misleading.  
 23 Can you describe whether and to what extent that's the  
 24 kind of thing the software would solve?  
 25 A I'm sorry, repeat the question again?

Mehta - by Defendant - Direct/Ms. Rogers Page 3771

1 Q Sure. So, you had an earlier slide that talked about  
 2 inconsistencies in a document. Can you describe whether that is  
 3 the kind of thing the software would address?  
 4 A Certainly. So, as I mentioned earlier that the  
 5 software has built-in checks. So that the way you answer the  
 6 questions or you fill out a particular number on a particular  
 7 line item would force you to complete the other required  
 8 schedules or line items so that would, itself, would prevent any  
 9 type of inconsistencies in the reporting within the document.  
 10 Q Let's talk about the Audit Committee.  
 11 Can you describe for the jury the facts and documents  
 12 that you analyze relating to the NRA Audit Committee and how it  
 13 does its job?  
 14 A Sure. So, as independent auditors, we have a direct  
 15 line of reporting to the board and, typically, the Audit  
 16 Committee. So, we work for the board and the Audit Committee  
 17 and not management.  
 18 So, we have a collegial relationship with members of  
 19 management, but that's not who ultimately hires us to perform  
 20 the audit of the financial statements. It is the Audit  
 21 Committee of the board that hires us.  
 22 So, how does the Audit Committee carry out its  
 23 responsibilities? Typically, there's an Audit Committee  
 24 charter. So in that charter it outlines what responsibilities  
 25 the Audit Committee has for financial reportings. The Audit

Mehta - by Defendant - Direct/Ms. Rogers Page 3772

1 Committee has responsibility for the internal controls of the  
 2 organization. So, that's the responsibility that they're taxed  
 3 with.  
 4 They also are responsible ensuring that the  
 5 organization complies with the various laws and regulations that  
 6 it has to adhere to; and then, ultimately, it has -- as I  
 7 mentioned -- overall responsibility for the external audit.  
 8 Q You heard Mr. Plotts testify yesterday that as part of  
 9 the special procedures he did after the attorney general's  
 10 lawsuit, he looked at --  
 11 MR. CONLEY: Objection, characterizing testimony.  
 12 THE COURT: She can --  
 13 MS. ROGERS: I can abbreviate the characterization  
 14 slightly, but I'm trying --  
 15 THE COURT: You didn't get to it yet, so it is a  
 16 premature objection.  
 17 MS. ROGERS: I'm prematurely accommodating him.  
 18 THE COURT: You're just assuming.  
 19 Q You heard Mr. Plotts testify yesterday about special  
 20 procedures done after they filed their lawsuit; right?  
 21 A That's correct.  
 22 Q And you heard him testify that one of those special  
 23 procedures involve looking at whether the Audit Committee was  
 24 doing its job under its charter; right?  
 25 A That's correct.

Mehta - by Defendant - Direct/Ms. Rogers Page 3773

1 Q Did you look at similar issues in forming your expert  
 2 opinion?  
 3 A Yes. So, in reviewing the work that was done by  
 4 Aronson, I looked at the extent that they performed their  
 5 procedures and how that would compare to procedures that I would  
 6 perform where I would perform an audit of an organization.  
 7 So, I was comfortable with the -- by the way, what  
 8 Aronson refers as special procedures are really just extended  
 9 procedures that they performed in light of --  
 10 MR. CONLEY: Objection, your Honor.  
 11 THE COURT: The witness is not here to give an  
 12 opinion about the quality of Aronson's work. He's here to  
 13 give you his opinion based on his own work.  
 14 Q Let me ask this. I won't ask about the quality of  
 15 Aronson's work; but we did hear cross-examination yesterday  
 16 about the difference between a financial audit with special  
 17 procedures, which is what Aronson did, and an internal controls  
 18 audit.  
 19 Do you recall that?  
 20 A I do.  
 21 Q If you were advising the NRA, would you tell the NRA to  
 22 do an internal control audit?  
 23 MR. CONLEY: Objection.  
 24 THE COURT: Overruled.  
 25 A So, the NRA complies -- currently complies with what

NYAG v  
NRA

February 8, 2024

Mehta - by Defendant - Direct/Ms. Rogers Page 3774

1 they're required to do, which is performing a financial  
 2 statement audit. Under New York State they're required to  
 3 perform a financial statement audit and also file a Federal Form  
 4 990.  
 5 There is no requirement under New York State to perform  
 6 any type of an internal control audit. Organizations may elect  
 7 to do that, should they wish to get an additional level of  
 8 comfort, organizations may wish to incorporate an internal audit  
 9 function within the organization, but there's certainly not a  
 10 requirement.  
 11 Given the -- given the robust policies of the  
 12 procedures that the NRA has placed, the different groups that  
 13 work together during the NRA, for example, the Financial  
 14 Services Division, the CFO, the treasurer, the office of General  
 15 Counsel, use of outside consultants; it is my opinion the NRA  
 16 has a robust internal control structure in place already that  
 17 would not necessitate them to perform a separate internal  
 18 control audit.  
 19 Q Let's talk about the NRA's commitment to corporate  
 20 governance. That's your opinion number 5.  
 21 You've audited hundreds of non-profits. Without  
 22 revealing confidential details about any other client, where  
 23 would you say the NRA ranks in its commitment to corporate  
 24 governance among the non-profits you've looked at and I'll tell  
 25 you to focus that ranking on the time period you looked at which

Mehta - by Defendant - Direct/Ms. Rogers Page 3776

1 Q All right. Let's turn to Page 5 of this exhibit.  
 2 Did you review this management letter in forming your  
 3 opinion?  
 4 A I did.  
 5 Q As part of the basis for your opinion?  
 6 A I did.  
 7 Q You heard testimony yesterday about significant  
 8 deficiencies, and I want to know if you disagree with Aronson on  
 9 any of these.  
 10 A So when we think about a management letter, it's one of  
 11 the documents that we issued.  
 12 MR. CONLEY: Objection, your Honor. This isn't --  
 13 this is beyond the scope of his report.  
 14 MS. ROGERS: He is responding directly to testimony  
 15 he heard yesterday.  
 16 THE COURT: Well, you're asking him whether he  
 17 disagrees with the conclusions in this document which he's  
 18 had for his report, so sustained.  
 19 Q Okay. All right. Well, I can't ask that because  
 20 that's beyond the scope of your report, but in addition to  
 21 management letters, did you review other communications issued  
 22 by the auditors to the NRA?  
 23 A Yes. So in addition to the management letter, I  
 24 reviewed their required communication with those charged with  
 25 governance. So that's a letter that we typically issue in every

Page 3775

1 started before their lawsuit in 2019 and into 2020?  
 2 A So in 2019, again, based on my experience having  
 3 performed financial statement audits of hundreds of non-profits  
 4 in my career and looking at the breadth and depth of the  
 5 procedures and policies that the NRA has in place, in 2019 I  
 6 would probably put their governance structure in the top  
 7 25 percent.  
 8 Ones this litigation was brought on by the AG's office  
 9 and the improvements that they made to their environment in  
 10 2020, I would say probably in the top 10 to 15 percent.  
 11 Q And then listening to the trial which has included  
 12 testimony about improvements after 2020, would that ranking  
 13 change?  
 14 A I would still put them in the top 10 to 20 percent.  
 15 Q You mentioned earlier that at the end of the audit you  
 16 send a management letter if you want to communicate certain  
 17 issues to management; right?  
 18 A That's correct.  
 19 Q And yesterday you saw Mr. Plotts cross-examined about a  
 20 management letter he issued, which was Plaintiff's Exhibit 48.  
 21 MS. ROGERS: Can you put that up.  
 22 (Displayed)  
 23 (Continued on next page)  
 24  
 25

Mehta - by Defendant - Direct/Ms. Rogers Page 3777

1 audit, and what that letter does is outlines the auditor's  
 2 responsibilities, you know, what we came across from the results  
 3 of the audit, whether we had disagreements with management,  
 4 whether there were any audit adjustments that we came across  
 5 that were either booked or passed upon by management.  
 6 We talked about our independence. We talked about the  
 7 accounting principles that the organization utilized and what  
 8 are your thoughts on those accounting principles. So it's  
 9 basically recap to the Audit Committee of the work that we have  
 10 done and the results of our audit.  
 11 Q And in your career as an auditor, you have delivered  
 12 these communications hundreds of times; right?  
 13 A That's correct.  
 14 Q In reviewing Aronson's communications to the Audit  
 15 Committee and the Audit Committee's response, how would you rank  
 16 the NRA's responsiveness to its auditors concerning relative to  
 17 other non-profits that you have seen?  
 18 MR. CONLEY: Objection. Outside the scope of his  
 19 reports.  
 20 MS. ROGERS: It's not explicitly in his report. I  
 21 would say it's within the general area that he's analyzing.  
 22 The NRA's commitment to corporate governance, this is  
 23 certainly one of the benefits of that.  
 24 Q Do you need me to ask it again?  
 25 THE COURT: Overruled.

Mehta - by Defendant - Direct/Ms. Rogers Page 3778

1 A Yes.

2 Q You have hundreds of times at the end of your audit

3 issued management letters and governance letters, and you have

4 talked those over with management and audit committees; right?

5 A That's correct.

6 Q And they respond to your concerns to some degree;

7 right?

8 A That's right.

9 Q So looking at the documents, looking at what Aronson

10 told the NRA and how the NRA responded, how would you rank the

11 NRA's responsiveness, it's Audit Committee relative to other

12 non-profits you've seen? How would you rank their

13 responsiveness to the concerns their auditors raised?

14 A So the NRA has been responsive to recommendations and

15 suggestion by their audit firm.

16 Even when I compared 2019 to 2020, you can see the

17 volume of comments that the auditors provided to management come

18 down. So the way the comments are phrased is that the auditors

19 provide a recommendation and then management is given an

20 opportunity to respond. How are they going to address those

21 recommendations? And we typically like to give the client about

22 a year to address those hopefully for the following year that

23 those comments have been addressed. And when I look at the

24 NRA's management letters, I can see an effort by management to

25 address the comments and implement the best practice

Mehta - by Defendant - Direct/Mr. Fleming Page 3779

1 recommendations by the auditors.

2 Q And how do those efforts compare like percentage-wise

3 to other non-profits?

4 A Again, I would put them in the top 15 to 25 percent.

5 MS. ROGERS: Thank you. Pass the witness.

6 THE COURT: Okay. Any other direct testimony?

7 MR. CORRELL: Not here, your Honor.

8 MS. COUTU: No your Honor.

9 MR. FLEMING: Just a couple of questions.

10 CROSS-EXAMINATION

11 BY MR. FLEMING:

12 Q Mr. Mehta, good morning. I just wanted to see if I

13 understood a couple of things. The financial statements you

14 testified belong to management; is that right?

15 A That's correct.

16 Q All right. So the auditor doesn't create the financial

17 statements?

18 A That's correct.

19 Q They just audit them.

20 A That's correct.

21 Q Okay. And when an auditor gives a clean opinion, is

22 that in any way a commentary on the care and competence of the

23 NRA's professionals who put it together?

24 MR. CONLEY: Objection. Leading.

25 THE COURT: Let's -- overruled on this one.

Mehta - by Defendant - Cross/Mr. Conley Page 3780

1 A So when an auditor gives an unmodified or clean

2 opinion, there is some level of comfort that the auditor -- the

3 public can take that the financial statements were prepared in

4 accordance with generally accepted accounting principles and

5 thereby draw a conclusion that there is competency among the

6 management group who prepared those financials.

7 Q I can't recall if your testimony is that you were an

8 auditor at some point. Were you?

9 A I am still an auditor.

10 Q Okay. And do you derive comfort from a company's

11 financial statements after an audit?

12 A I do.

13 Q Okay. Second question I have and last question, and

14 I'm not sure if I got it right. But you said in 2019 the

15 governance of the NRA you viewed was in the top 25 percent of

16 companies.

17 A In my opinion, yes.

18 Q And if the New York AG began its investigation in 2019,

19 would that statement cover that period of time?

20 A Yes.

21 MR. FLEMING: Thank you.

22 THE COURT: Any cross-examination from the State?

23 MR. CONLEY: Yes, your Honor.

24 CROSS-EXAMINATION

25 BY MR. CONLEY:

Mehta - by Defendant - Cross/Mr. Conley Page 3781

1 Q Good morning, Mr. Mehta. Can you hear me?

2 A Good morning. Yes.

3 Q You were retained by the NRA to testify in this action;

4 correct?

5 A That's correct.

6 Q What's your hourly rate?

7 A 975.

8 Q How much has Marcum billed the NRA to date for your

9 services?

10 A I have billed -- my firm has billed approximately

11 \$400,000 to date.

12 Q Okay. If I understood your testimony, you are offering

13 the opinion that the NRA's sufficiently robust policies and

14 procedures in place detect and address conflicts of interest and

15 related-party transaction issues. Is that accurate?

16 A That's correct.

17 Q That opinion does not apply to policies in place of the

18 NRA before January 1, 2019; correct?

19 A That's correct.

20 Q And while you are saying that these policies are

21 sufficiently robust, you aren't actually offering an opinion on

22 whether the opinions were violated; correct?

23 A That's correct.

24 Q So while you're telling the jury today that the NRA's

25 conflict of interest and related-party transaction policies are

NYAG v  
NRA

February 8, 2024

Mehta - by Defendant - Cross/Mr. Conley Page 3782

1 sufficiently robust, you're in no way refuting or contesting  
 2 that there were persistent violations of these policies for  
 3 years; are you?  
 4 A I'm not drawing that conclusion.  
 5 Q And you are not offering any opinion whatsoever on  
 6 whether any of the NRA's internal policies have been violated;  
 7 correct?  
 8 A That's correct.  
 9 Q You also opined that the NRA established protocols for  
 10 handling whistle blowing; correct?  
 11 A That's correct.  
 12 Q You are not offering an opinion today that the NRA's  
 13 whistleblower program is actually operating effectively;  
 14 correct?  
 15 A That's correct.  
 16 Q And you admit that evaluating the effectiveness of a  
 17 whistleblower program is not within your expertise; correct?  
 18 A That's correct.  
 19 Q You also stated a couple of opinions about the NRA's  
 20 regulatory filings.  
 21 You didn't perform any of our own testing to verify  
 22 that any of the information the NRA reported in it's Form 990  
 23 was accurate and complete.  
 24 A I did not perform my own testing.  
 25 Q You also offer an opinion that the Audit Committee

Mehta - by Defendant - Cross/Mr. Conley Page 3783

1 properly discharged its responsibilities with respect to the  
 2 NRA's outside auditors; correct?  
 3 A That's correct.  
 4 Q At the time that you were deposed in 2022, you had  
 5 never spoke with the Audit Committee members; correct?  
 6 A That's correct.  
 7 Q You never attended any Audit Committee meetings?  
 8 A That's correct.  
 9 Q You couldn't name any of the members of the Audit  
 10 Committee; right?  
 11 A No, I can name a member.  
 12 Q In your deposition in 2022, you could not; correct?  
 13 A I couldn't remember.  
 14 THE COURT: Little tiny bit slower on the  
 15 questions.  
 16 Q And when you were deposed in 2022, you couldn't recall  
 17 how many people served on the Audit Committee; correct?  
 18 A At that time, I probably didn't know exact number.  
 19 Q You're also offering the opinion that the NRA's  
 20 demonstrated a commitment to corporate governance and strong  
 21 internal controls.  
 22 A Correct.  
 23 Q You are not saying that the NRA demonstrated commitment  
 24 to corporate governance and strong internal controls in 2018;  
 25 correct?

Mehta - by Defendant - Cross/Mr. Conley Page 3784

1 A That's correct.  
 2 Q Or in 2017?  
 3 A That's correct.  
 4 Q Or in 2016; right?  
 5 A That's correct.  
 6 Q And isn't it true that in offering this opinion, you  
 7 didn't actually apply any established standards or framework;  
 8 correct?  
 9 A Well, I consulted accounting guidance and relied on my  
 10 skills, knowledge and experience, education and training, but I  
 11 did consult accounting guidance in offering my opinion.  
 12 Q You were not actually applying any standards or  
 13 framework.  
 14 A That's not correct. I referred to accounting  
 15 guidelines in offering my opinions.  
 16 Q Do you recall being deposed in this action in 2022?  
 17 A I do.  
 18 Q And you swore an oath to tell the truth?  
 19 A I did.  
 20 MS. ROGERS: Jesse, could you please pull up Page  
 21 375, Lines 12 to 25.  
 22 Q I draw your attention to question: "You opine that the  
 23 NRA's demonstrated a commitment to corporate governance; is that  
 24 correct?"  
 25 "That's correct" is your answer.

Mehta - by Defendant - Cross/Mr. Conley Page 3785

1 "Question: So what standards are you applying when  
 2 you make that statement?  
 3 I'm referring to the documentation that was  
 4 provided, the testimony that's been provided and my review  
 5 of the work papers that Aronson provided.  
 6 Question: Are there any standards or framework  
 7 that you're applying?  
 8 Answer: No."  
 9 You would agree that without enforcement, even the  
 10 best written policies are just words on paper; correct?  
 11 A That's correct.  
 12 Q And you're opining that the NRA's demonstrated a  
 13 commitment to corporate governance and strong internal controls  
 14 without having conducted any independent evaluation of whether  
 15 the NRA internal controls were actually followed; correct?  
 16 A That's correct.  
 17 Q You don't believe that misappropriating or misusing  
 18 funds is appropriate if it's below a certain monetary threshold;  
 19 do you?  
 20 A I'm sorry. Can you repeat the question?  
 21 Q I will ask it differently.  
 22 Diverting charitable assets is wrong; correct?  
 23 A That's correct.  
 24 Q And you aren't opining that misusing charitable funds  
 25 is okay if it's below a certain amount; correct?

Mehta - by Defendant - Redirect/Ms. Rogers Page 3786

1 A That's correct.  
 2 MR. CONLEY: Pass the witness. Thank you.  
 3 THE COURT: Anything further?  
 4 MS. ROGERS: Just a bit more.  
 5 REDIRECT EXAMINATION  
 6 BY MS. ROGERS:  
 7 Q Mr. Mehta, you just testified that you didn't test  
 8 whether the NRA's good policies were actually being followed;  
 9 right?  
 10 A I didn't independently test them.  
 11 Q But in the course of your work as an auditor, do you  
 12 have to be alert for indications that the policies you look at  
 13 are being followed or disobeyed?  
 14 A Yes.  
 15 Q And in the documents that you looked at for the years  
 16 you looked at, did you see indicia that the NRA was letting its  
 17 policies be violated?  
 18 MR. CONLEY: Objection. Leading.  
 19 THE COURT: Well, it's not leading.  
 20 Q I am happy to rephrase.  
 21 THE COURT: I'm just trying to -- overruled. You  
 22 can ask.  
 23 Q In the document you looked at for the years you looked  
 24 at, did you see indicia that the NRA was letting its policies be  
 25 violated?

Mehta - by Defendant - Redirect/Ms. Rogers Page 3787

1 A No.  
 2 Q Irrespective of whether there is a formal framework you  
 3 use every time in the ordinary course of your work as an  
 4 auditor, do you have to form opinions about companies'  
 5 commitment to governance?  
 6 A I'm sorry. Repeat the question.  
 7 Q Sure. In the ordinary course of your work as an  
 8 auditor, do you have to try to gauge whether or -- strike that.  
 9 I'm sorry.  
 10 In the ordinary course of your work as an auditor, do  
 11 you have to try to gauge whether the company you're auditing is  
 12 committed to good governance?  
 13 A Yes.  
 14 Q Why?  
 15 A Again, you know, with -- one of the areas that we  
 16 looked, and I think we talked about COSO Framework with one of  
 17 the expert witnesses, that one of the bases for sound internal  
 18 control environment would be to assess the tone at the top. So,  
 19 you know, commitment to corporate governance would be a factor  
 20 evaluating the tone at the top.  
 21 Q And even if there is no formal framework you're citing  
 22 every time you make that judgment, can you describe for the jury  
 23 whether that judgment impacts your ability to audit the  
 24 financials?  
 25 A I'm sorry. Again, repeat the question.

Mehta - by Defendant - Recross/Mr. Conley Page 3788

1 MS. ROGERS: You know what, that's okay. Pass the  
 2 witness.  
 3 THE COURT: Okay. Anything further?  
 4 MR. CONLEY: Briefly, your Honor.  
 5 RECROSS-EXAMINATION  
 6 BY MR. CONLEY:  
 7 Q Mr. Mehta, you are an auditor; correct?  
 8 A That's correct.  
 9 Q In this case you didn't perform an internal control  
 10 audit; correct?  
 11 A That's correct.  
 12 Q And you didn't perform a financial statement audit;  
 13 correct?  
 14 A That's correct.  
 15 Q And you didn't test the work that the NRA's external  
 16 auditor Aronson performed; correct?  
 17 A I did not independently test the work.  
 18 THE COURT: Anything else?  
 19 MS. ROGERS: Nothing further.  
 20 THE COURT: All right, sir. You are free to step  
 21 down. Thank you.  
 22 So would now be a good time to break before the  
 23 next witness?  
 24 MS. ROGERS: Yes, your Honor. I think so.  
 25 THE COURT: Let's take a short break and then we'll

Blacker - by Defendant - Direct/Ms. Rogers Page 3789

1 push on.  
 2 THE COURT OFFICER: All rise. Jury exiting.  
 3 (Whereupon, at this time the jury exits  
 4 the courtroom.)  
 5 (Whereupon at this time there was a recess taken.)  
 6 THE COURT: Have a seat. Let's get the jury. Who  
 7 is the next witness so they can get them ready?  
 8 MS. ROGERS: So he is also an expert. He is our  
 9 last one, so he's here.  
 10 THE COURT: Just remember to talk clearly and  
 11 slowly.  
 12 THE COURT OFFICER: All rise. Jury entering.  
 13 (Whereupon, at this time the jury entered the  
 14 courtroom.)  
 15 THE COURT: Okay. Have a seat, please. Next  
 16 witness, Counsel.  
 17 MS. ROGERS: The NRA calls Bruce Blacker.  
 18 THE COURT: Good morning.  
 19 B R U C E B L A C K E R, a witness called on  
 20 behalf of the Defendant, after having been first duly sworn,  
 21 took the witness stand and testified as follows:  
 22 THE CLERK: State your name.  
 23 THE WITNESS: Bruce Leon Blacker, B-L-A-C-K-E-R.  
 24 THE CLERK: Thank you. You may be seated.  
 25 DIRECT EXAMINATION

NYAG v  
NRA

February 8, 2024

Blacker - by Defendant - Direct/Ms. Rogers Page 3790

1 BY MS. ROGERS:  
 2 Q Good morning, Mr. Blacker.  
 3 A Good morning.  
 4 Q Could you please introduce yourself briefly to the  
 5 jury.  
 6 A Yes. My name is Bruce Blacker. I'm a CPA. I'm  
 7 certified in financial forensics. And generally what I do is  
 8 provide consulting services to clients, and some of that  
 9 consulting services includes being an expert witness like I am  
 10 in this case today.  
 11 Q Can you tell the jury about your professional  
 12 credentials and experience in the fields of forensic accounting  
 13 and financial forensics?  
 14 A I have a slide. Let me just briefly explain my  
 15 background and why I'm here today.  
 16 I received my Bachelors in Accounting in 1989 and a  
 17 Master Degree from Brigham Young University.  
 18 After that I began working at what was then one of the  
 19 Big Eight accounting firms, KPMG. Today you will hear of the  
 20 Big Four accounting firms, and there was some consolidation. I  
 21 worked in their tax department and prepared tax returns.  
 22 After that I began working at Pricewaterhouse Coopers.  
 23 I was in their dispute analysis and resolution group, and what  
 24 the services that I provided there included an assessment of  
 25 financial documents in bankruptcy and insolvencies.

Blacker - by Defendant - Direct/Ms. Rogers Page 3791

1 I did business valuations and forensic work, fraud  
 2 investigations where we began to do expert witness testimony.  
 3 You heard a lot about independence and objectivity with  
 4 accountants. Pricewaterhouse Coopers at the time, and I was a  
 5 partner there was one of the largest, if not the largest  
 6 accounting firm in the world. But as I said, I provided  
 7 consulting services including litigation consulting services.  
 8 And to maintain independence, it became very difficult for me to  
 9 have the world largest accounting firm doing tax work and audit  
 10 work and then me maintain my independence and provide consulting  
 11 work. So I had an opportunity to leave. And generally over the  
 12 last 20 years, I have either worked at an economic consulting  
 13 firm or a financial advisory firm, but I have continued to use  
 14 my accounting to provide these consulting services.  
 15 Q Now, we have heard that Pricewaterhouse Coopers used to  
 16 audit the NRA.  
 17 Just to be clear for the jury, you weren't part of the  
 18 Pricewaterhouse Coopers team that worked on the NRA.  
 19 A That's correct.  
 20 As I said, I was part of a consulting division. I  
 21 wasn't part of the audit division or the tax division. There is  
 22 others, but I will just divide it into those three categories  
 23 for this purpose.  
 24 Q We've heard about different kind of audits. We heard  
 25 from an external auditor Mr. Mehta, an internal auditor Mr.

Blacker - by Defendant - Direct/Ms. Rogers Page 3792

1 Lerner and a forensic auditor a Mr. Hines who testified for the  
 2 Government.  
 3 What kind of audits have you done?  
 4 A So this is where sometimes speaking generally can be  
 5 misleading.  
 6 Often times I'm asked because I provide consulting  
 7 services, Are you an auditor. Because the general public, and I  
 8 think most people think of auditing as auditing the financial  
 9 statements, it wouldn't be uncommon for me to say, No, that's  
 10 not what I do. However, to an accountant, an audit means  
 11 different things. So as an accountant and as a consultant, I'm  
 12 often times asked do you conduct an audit of a contract, audit  
 13 for compliance, audit for those things.  
 14 So I just caution you when you hear "audit," it may not  
 15 be that there is an internal control audit or a financial  
 16 statement audit. There is also other types of audits.  
 17 Q You have done compliance audits; right?  
 18 A I have done compliance audits.  
 19 Q And forensic audits; right?  
 20 A And forensic.  
 21 For example, their are rules and regulations in the  
 22 healthcare industry as to what hospitals can charge insurance  
 23 companies and how that's billed.  
 24 So for example, I would go in and see if they were in  
 25 compliance with regard to that contract or two companies may

Blacker - by Defendant - Direct/Ms. Rogers Page 3793

1 enter into a licensing agreement where royalties are due one to  
 2 another. I have audited those contracts to see if they are in  
 3 compliance with those contracts.  
 4 MS. ROGERS: I offer -- the NRA offers Mr. Blacker  
 5 as an expert in forensic accounting and financial forensics.  
 6 MR. CONLEY: No objection, your Honor.  
 7 THE COURT: Okay. He is admitted for that purpose.  
 8 Q We see a company on your screen Secretariat, and we  
 9 have heard testimony earlier this week from Ryan Sullivan, the  
 10 economist.  
 11 You worked with Mr. Sullivan on your expert analysis;  
 12 right?  
 13 A He is my colleague. Dr. Sullivan is a stellar  
 14 economist. I come out with a different background being an  
 15 accountant, CPA and certified in financial forensics.  
 16 Q What were you asked to do in this case?  
 17 A The task that we were given was to evaluate the NRA's  
 18 controls efforts using the tools that we have from our  
 19 experience, education and training.  
 20 So on the slide, you'll see that I have highlighted  
 21 finance and accounting. You have heard from Dr. Sullivan  
 22 already, so I will try to stick to the accounting piece of the  
 23 work that we did.  
 24 Q Now you were here listening to Dr. Sullivan testify;  
 25 right?

NYAG v  
NRA

February 8, 2024

Blacker - by Defendant - Direct/Ms. Rogers Page 3794

1 A I came on Tuesday. I think he started Monday, but I  
2 have been in the courtroom since Tuesday.  
3 Q Well, did you hear him examined about what he was being  
4 paid and what you were being paid and what Secretariat was being  
5 paid?  
6 A Yes, I did.  
7 Q And you're being compensated as an expert; right?  
8 A To be specific, my employer pays me for the work that I  
9 do, and the NRA is paying my employer.  
10 Q But you are not being paid -- your employer is the same  
11 as Mr. Sullivan's. So you're covered by what the money that was  
12 discussed with Dr. Sullivan; right? You are not additional.  
13 A Exactly. My personal compensation is not tied to this  
14 case because as an accountant, for one, I have to be independent  
15 and objective.  
16 Q All right. What materials and information did you  
17 consider in evaluating the NRA's control efforts from a finance  
18 and accounting perspective?  
19 A I mentioned that I provide consulting services and  
20 sometimes it's in a litigation.  
21 Now, if it's not in a litigation, it's a little bit  
22 different than in litigation. But in litigation, we are  
23 provided the documents that are produced within the litigation  
24 itself.  
25 So I reviewed the financial statements, the audit

Blacker - by Defendant - Direct/Ms. Rogers Page 3795

1 reports, the audit work papers, the policies and all the  
2 documents that you've heard about now.  
3 I have had an opportunity to review those and to read  
4 deposition testimony and to sit here in court prior to arriving  
5 here. I was provided some transcripts. Its been a long trial.  
6 I think the transcripts were up to over 3,000 pages, so I got  
7 through them the best that I could. But I take all of that  
8 information as an input into forming my independent opinion.  
9 Q And what additional work did you do before arriving  
10 here today?  
11 A I have assessed as I mentioned before how effective the  
12 NRA has been in monitoring its controls. I have also looked at  
13 specifically the testimony both in reports and at trial of Mr.  
14 Tenenbaum and Mr. Hines.  
15 Q Did you hear Mr. Tenenbaum say anything about  
16 accounting or auditing that you would like to comment on?  
17 A Yes. Two quick points. Mr. Tenenbaum is not an  
18 accountant. And when I heard his testimony that auditors simply  
19 test the numbers, I think after the testimony today and  
20 yesterday, I think you know that auditors do a lot more than  
21 just test the numbers. So I took issue with that.  
22 The testimony that he did give that I totally agree  
23 with is that companies in their attempt to be independent, to go  
24 through this cycle of monitoring, identifying, correcting and  
25 improving, they should rely on outside experts. As an

Blacker - by Defendant - Direct/Ms. Rogers Page 3796

1 accountant, I sometimes too rely on the information that other  
2 professionals conduct.  
3 You have heard the phrase, you know, "Trust But  
4 Verify." That's what accountants do.  
5 Q Great. And let's -- is your clicker working?  
6 A Yes.  
7 Q And you did some work. You prepared a report; right?  
8 A So I was retained in this case in 2022. I have issued  
9 two reports, hundreds of pages, hundreds of foot notes, reviewed  
10 the deposition testimony that I talked about.  
11 Also in 2022 as part of litigation process, the  
12 Attorney General's Office of New York is aware of the opinions  
13 that are in my report. They have not taken my deposition. I  
14 provided deposition testimony so that they would know what my  
15 opinions would be.  
16 Q In addition to reviewing testimony by the Government's  
17 expert Mr. Tenenbaum, you also reviewed testimony by Mr. Hines.  
18 He is a forensic accountant like you; right?  
19 A He is.  
20 Q And did you form any opinions in response to Mr. Hines  
21 that you want to share with the jury?  
22 A You seen the slide maybe a couple of times. And as a  
23 forensic accountant, one of the things that I want to point out  
24 that he and I are totally in agreement on and that is that fraud  
25 risk indicators are just that. They are only indicators of the

Blacker - by Defendant - Direct/Ms. Rogers Page 3797

1 possibility of fraud. They do not in and of themselves mean  
2 that there was any misconduct or harm that was done because of  
3 the internal controls.  
4 I do have concerns about the way too that Mr. Hines  
5 said and tried to make it a distinction, if you will, between --  
6 MR. CONLEY: Objection, your Honor, to  
7 characterization of other testimony.  
8 THE COURT: Overruled.  
9 A That Mr. Hines made the distinction between what a  
10 financial audit is and what an internal audit is. They are  
11 different, but I think it's incomplete to not take it a step  
12 further.  
13 Q Please take it that step further for the jury.  
14 How would you explain that?  
15 A For example, again, I have taken only as an input into  
16 my analysis to form my own independent opinion the work of other  
17 professionals including the NRA's auditors.  
18 When looking at the audit for December of 2019, the  
19 year 2019, you heard testimony from Mr. Plotts that the auditors  
20 begin somewhere in the Fall and begin the audit and then that  
21 audit takes about five months. So somewhere around March they  
22 are going to issue this audit.  
23 Part of that was that they issued a management letter  
24 which you've heard about. That's the audit might be looking  
25 backwards, but the management letter is looking forward. I

Page 3798

1 think it's important on the slide here right above those  
 2 highlighted, it says that it's done in accordance with auditing  
 3 standards generally accepted in the United States of America.  
 4 Those standards are for audits. So the auditors have standards  
 5 that they have to follow. They follow GAP, generally accepted  
 6 accounting principles. That, as I forensic accountant gives me  
 7 a lot of comfort in taking that piece of data, putting it into  
 8 my analysis and assessing that in forming an independent  
 9 analysis.  
 10 (Continued on the following page.)  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

B. Blacker - by Defendant - Direct/Ms. Rogers Page 3799

1 Q Now, you saw the Government's forensic accountant  
 2 create some of his own data in that he took dollar amounts in a  
 3 bunch of invoices and added them up.  
 4 MR. CONLEY: Objection, your Honor, on  
 5 characterization of work done by an expert.  
 6 THE COURT: Overruled. Are you talking about the  
 7 compilations exhibits?  
 8 MS. ROGERS: Yes, yes.  
 9 Q Do you -- did you understand that that's what their  
 10 expert was doing?  
 11 A Yes, and I may have gotten a little ahead of the  
 12 slides. I'm going to go quickly through the slides.  
 13 This is again Aronson talking about the special  
 14 procedures. We don't need to talk about that anymore.  
 15 MR. CONLEY: Objection, your Honor. There's no  
 16 question pending.  
 17 Q Well, let's talk first about what Hines discussed, and  
 18 then we'll hear more what you have to say about the special  
 19 procedures.  
 20 But their forensic accountant made big lists on all of  
 21 the flight invoices and what they totalled; right?  
 22 A Yes.  
 23 Q You're a forensic accountant and you didn't do that;  
 24 right?  
 25 A I did not need to do that.

Page 3800

B. Blacker - by Defendant - Direct/Ms. Rogers

1 MR. CONLEY: Objection.  
 2 THE COURT: Overruled.  
 3 Q Why?  
 4 A I was asked to assess whether the internal controls and  
 5 specifically the corrective action of the NRA had been  
 6 effective.  
 7 So, on this slide I'm showing where Mr. Hines' analysis  
 8 was about past transactions, and he went in and he summarized  
 9 some of those past transactions. Again, those are transactions  
 10 that possibly could be at issue because those were only fraud  
 11 indicators, not evidence of fraud.  
 12 So, as a forensic accountant, I would be concerned that  
 13 that's not measuring the right thing as far as either the  
 14 internal control or --  
 15 MR. CONLEY: Objection, your Honor, testifying to  
 16 what's at issue here.  
 17 THE COURT: Overruled.  
 18 A That that's not measuring the assets that are alleged  
 19 to have been self-dealt or mismanaged.  
 20 Q And in your career as a forensic accountant, have you  
 21 ever made a list of invoices that had fraud indicators without  
 22 looking at whether assets were ever actually diverted?  
 23 A Not in the real world. All right, so I will do  
 24 consulting outside of litigation and that would be an incomplete  
 25 analysis. If I had a client who wanted to know if there were

B. Blacker - by Defendant - Direct/Ms. Rogers Page 3801

1 fraud indicators, they would want to know, well, how much and  
 2 what next.  
 3 Q Would you ever look only at what the organization was  
 4 paying for a contract and ignore what the organization was  
 5 getting?  
 6 A No. This goes to the incomplete assessment of what  
 7 Mr. Hines has done in my opinion.  
 8 Let's just take the vendors, for example. I'll give  
 9 two examples starting with the vendors. Some of the vendors I  
 10 was able to see that there were issues with, and those were  
 11 terminated and I went and looked at the general ledger and I  
 12 could see if the payment stopped. So, I know the corrective  
 13 action was taken there.  
 14 Other vendors were ratified and continued to move  
 15 forward. They would fall in Mr. Hines' bucket of, Here's some  
 16 invoices that I'm concerned -- concerned about, red flagged.  
 17 What that doesn't tell you is did the NRA receive reasonable,  
 18 fair services? So, that would be for the vendors.  
 19 Another example would be for an employee who had a  
 20 business trip, but they took a black car service. The business  
 21 trip was valid. They needed to have a travel expense, but there  
 22 might be an incremental difference between following the NRA  
 23 policy and using, say, black car service.  
 24 Mr. Hines did not do that analysis.  
 25 Q What do you mean when you say "incremental?"

B. Blacker - by Defendant - Direct/Ms. Rogers Page 3802

1 A The difference. If, if the allegation is that there  
 2 was self-dealing and that there were mismanagement of assets,  
 3 what Mr. Hines does not do is provide that amount.  
 4 All he does is provide the entire universe where  
 5 there's red flags where there should be further investigation.  
 6 He doesn't complete the analysis to say here's what the amount  
 7 is.  
 8 Q You heard Mr. Mehta testify that accountants look at  
 9 what kind of deal the company could have gotten if it went out  
 10 into the market.  
 11 Do you recall that?  
 12 A Yes.  
 13 Q Can you explain to the jury how, if at all, that plays  
 14 into what you've diagrammed here vis-a-vis alternative NRA  
 15 decisions?  
 16 A Again, bringing it back to what Mr. Hines did not do,  
 17 so we've -- he looked at what the real world -- what the  
 18 decision actually was.  
 19 What he doesn't do as Mr. Mehta had said is go out and  
 20 get a request for a proposal or see who else could provide the  
 21 services. This chart indicates that it might have been more  
 22 expensive or less expensive.  
 23 Mr. Hines didn't do that analysis, so, again, we're  
 24 just left with a summation of expenses that aren't -- that don't  
 25 get to the issue.

B. Blacker - by Defendant - Direct/Ms. Rogers Page 3803

1 Q I apologize because I asked you a question earlier that  
 2 was out of sync with your PowerPoint.  
 3 Were there aspects of the Aronson special procedures  
 4 that informed your opinions that you want to tell the jury  
 5 about?  
 6 A Again, it's the Aronson documents were an input. Why  
 7 do I think the basis for why it was important to me to be able  
 8 to look at Aronson and to look at the financial statements and  
 9 be able so see there were clear audits is knowing that not only  
 10 was the normal, if you will -- auditing the NRA is not normal --  
 11 there were additional steps that were taken and that was  
 12 important to me --  
 13 MR. CONLEY: Objection, your Honor. This is  
 14 testimony about work that Mr. Blacker didn't perform.  
 15 THE COURT: Overruled.  
 16 Q You can answer.  
 17 A As I said, I'm taking that as an input into my analysis  
 18 to know that the work that Aronson and other outside consultants  
 19 have done was thorough and rigorous.  
 20 Q You testified just now that auditing the NRA isn't  
 21 normal. What do you mean by that?  
 22 A No client, I guess, is normal with an accountant; but  
 23 it is no secret that the NRA has political implications. When  
 24 you mention the NRA, people usually have a reaction to that one  
 25 way or another.

B. Blacker - by Defendant - Direct/Ms. Rogers Page 3804

1 As a consultant or an auditor, that also has  
 2 implications as when you take a client as to what that means in  
 3 the marketplace. Are other people going to look at that  
 4 consultant and say, oh, you work for that entity or that entity?  
 5 I don't want to be associated with you or I do want to be  
 6 associated with you.  
 7 Those things are business decisions that have to be  
 8 made; but, also, because at the time they were looking at  
 9 retaking the audit, the lawsuit had been filed and they knew it  
 10 was going to be -- this is a public case with public issues --  
 11 MR. CONLEY: Objection, your Honor, to testifying  
 12 about what people knew or didn't know.  
 13 THE COURT: Overruled.  
 14 A The case was filed in -- at the end of 2020, and  
 15 they're trying to make this assessment as to whether they want  
 16 to take the audit. And they went through those special  
 17 procedures and determined that it was okay for them,  
 18 professionally, to be able to do the work that they needed to  
 19 and render the independent decision that they would, ultimately,  
 20 come up with.  
 21 THE COURT: Just to repeat the instruction I've  
 22 given now probably six times:  
 23 When the witness describes something like his  
 24 understanding of what Aronson was facing, sometimes people  
 25 use that words "it is my understanding that" and sometimes

B. Blacker - by Defendant - Direct/Ms. Rogers Page 3805

1 they leave that out. None of these statements of which  
 2 sound like facts are of personal knowledge of this witness.  
 3 All of the basis for his opinion is based on what  
 4 he read and heard from others, at least in terms of the  
 5 factual basis. So, just repeating that same -- that same  
 6 point. And I didn't sustain the objection because I believe  
 7 by now that you understand that when the witness is talking  
 8 about facts, he's saying that his understanding is based on  
 9 what he has read in preparing for this is X, Y and Z.  
 10 If you conclude that those facts are not accurate,  
 11 then you can take that into account.  
 12 Q Based on the resume of yours that we reviewed and your  
 13 experience as an accountant, if you were vetting a new client  
 14 engagement with a very controversial political adverse group  
 15 that had just been targeted for a dissolution for corruption by  
 16 a state regulator, would you vet that client more strictly or  
 17 less strictly than other clients?  
 18 A That's not a hypothetical question. I had to make that  
 19 decision in accepting this engagement.  
 20 Q And did you scrutinize the NRA more strictly or less  
 21 strictly than other companies?  
 22 A More strictly. We go through our conflict check, but  
 23 we also had to make a business decision.  
 24 MS. ROGERS: Thank you. Pass the witness.  
 25 THE COURT: Any other direct testimony?

NYAG v  
NRA

February 8, 2024

B. Blacker - by Defendant - Cross/Mr. Conley Page 3806

1 MR. CORRELL: No.  
 2 MR. FLEMING: Nothing for me.  
 3 THE COURT: Okay, from the State?  
 4 CROSS-EXAMINATION  
 5 BY MR. CONLEY:  
 6 Q Good morning, Mr. Blacker.  
 7 A Good morning.  
 8 Q What's your hourly rate in this case?  
 9 A I think it was mentioned before that Secretariat has  
 10 charged \$795 an hour for my services, and beginning in 2024 that  
 11 rate may have increased.  
 12 Q Your colleague, Dr. Sullivan, testified he didn't know  
 13 how much your prior firm, Intensity, and your current firm,  
 14 Secretariat, has billed the NRA for this matter. Do you know  
 15 how much they have been billed?  
 16 A I do not. There are people at Secretariat that take  
 17 care of the billing.  
 18 Q Your deposition in 2022, you testified you billed  
 19 hundreds of hours on this engagement; correct?  
 20 A Yes, I've spent a lot of time to form my opinion.  
 21 Q And safe to assume you've billed more since then?  
 22 A Yes, in preparation for today, certainly.  
 23 Q Mr. Blacker, are you aware that this case concerns  
 24 questions about compliance with corporate governance standards  
 25 for not-for-profits and their officers; right?

B. Blacker - by Defendant - Cross/Mr. Conley Page 3808

1 MR. CONLEY: Jesse, could you please pull up the  
 2 pretrial order.  
 3 (Displayed)  
 4 Q And this is a pretrial order in this DC action. Do you  
 5 see the highlighted language there, Mr. Blacker?  
 6 A I do see that. I don't know if I have actually seen  
 7 this document before.  
 8 Q And you agree it says:  
 9 "Upon review of Ryan Sullivan and Bruce Blacker's  
 10 qualifications as identified in their June 21, 2023, expert  
 11 report, neither expert is qualified to testify about  
 12 not-for-profit governance."  
 13 Do you see that?  
 14 A I see that's what it says, yes.  
 15 Q You are not an auditor, correct?  
 16 THE COURT: Just so it is clear, I don't think -- I  
 17 don't think he's been offered as an expert on not-for-profit  
 18 governance here.  
 19 MS. ROGERS: He has not. He's a forensic  
 20 accountant.  
 21 Q You're not an auditor, correct, Mr. Black?  
 22 A That's where I provided an explanation as what do you  
 23 mean by auditor? Do you mean auditor of financial statements?  
 24 Because to an accountant, there's a number of different types of  
 25 audits.

B. Blacker - by Defendant - Cross/Mr. Conley Page 3807

1 A As an accountant, that's my general understanding of  
 2 the legal allegations in the case.  
 3 Q You were engaged by the NRA to be an expert in an  
 4 action by the DC attorney general against the NRA and the NRA  
 5 Foundation; correct?  
 6 A To correct your question just a little bit, again, was  
 7 hired by outside counsel for the NRA, and then I can say yes.  
 8 Q Sure. And in that action there are also claims  
 9 concerning corporate governance standards and not-for-profits;  
 10 correct?  
 11 A I believe so, but I've been focused on this case so I  
 12 don't want to speculate.  
 13 Q And you were found unqualified to offer expert opinion  
 14 testimony on that topic, correct?  
 15 MS. ROGERS: Objection. Misstates the ruling, I  
 16 think.  
 17 THE COURT: That's not -- you can ask it. I'm  
 18 assuming you have some basis for asking that question the  
 19 way you did?  
 20 MR. CONLEY: Yes.  
 21 A Can you repeat the question? I did not understand it.  
 22 Q You were found unqualified to offer expert testimony on  
 23 corporate governance in that case, correct?  
 24 A I'm not an attorney. I don't believe that's a correct  
 25 way to describe that in the question.

B. Blacker - by Defendant - Cross/Mr. Conley Page 3809

1 Q Understood. You've never conducted a financial  
 2 statement audit; is that right?  
 3 A That is correct.  
 4 Q And you never conducted an internal control audit; is  
 5 that right?  
 6 A That is correct.  
 7 Q And in your analysis, you looked at transactions and  
 8 arrangements that the attorney general raised in the complaint  
 9 in this action, right?  
 10 A Yes.  
 11 Q And you're not opining on the accuracy of those  
 12 allegations; right?  
 13 A That would not be for me as an expert witness. I  
 14 believe that decision will be left up to the trier of fact.  
 15 Q You testified a moment ago that the attorney general --  
 16 about the attorney general's expert, Eric Hines; is that  
 17 correct?  
 18 A Yes, I spoke about Mr. Hines.  
 19 Q You are not opining that any of the arrangements and  
 20 transactions analyzed by Mr. Hines complied with the NRA policy;  
 21 are you?  
 22 A Mr. Hines is not providing that testimony and I am not  
 23 providing that testimony.  
 24 Q It is your understanding Mr. Hines isn't providing  
 25 testimony regarding the compliance of certain arrangements and

NYAG v  
NRA

February 8, 2024

B. Blacker - by Defendant - Redirect/Ms. Rogers Page 3810

1 transactions with NRA policy?

2 A Correct. He said he's identified red flags that would

3 require further investigation.

4 Q You have not evaluated whether the NRA's internal

5 controls are functioning currently, correct?

6 A That's correct, and was not necessary in forming my

7 opinion.

8 Q And you did not evaluate whether the NRA's

9 relationships with the vendors complied with internal policies

10 and procedures; correct?

11 A Again, not necessarily for the work I did, no, I did

12 not.

13 MR. CONLEY: Pass the witness.

14 THE COURT: Anything further?

15 MS. ROGERS: Just a little bit.

16 REDIRECT-EXAMINATION

17 BY MS. ROGERS:

18 MS. ROGERS: I'm going to ask if the attorney

19 general tech person would be so kind as to put back on the

20 screen the DC AG case ruling shown a moment ago, and scroll

21 down to the two sentences that were left off the screen.

22 Q And while we're waiting for that, Mr. Blacker, to your

23 knowledge have you ever been offered as an expert on

24 not-for-profit corporate governance law?

25 A No.

B. Blacker - by Defendant - Redirect/Ms. Rogers Page 3811

1 Q Do you remember that you were offered as an expert in

2 forensic accounting in the DC case?

3 A Yes, I was.

4 Q Did you know that they moved to strike your opinion,

5 and the court denied that motion and said that you could testify

6 about forensic accounting?

7 A I have that understanding from counsel. I don't think

8 I've reviewed this document, but that's my understanding, yes.

9 MS. ROGERS: All right, nothing further.

10 THE COURT: Okay. Anything further for anyone?

11 MR. CONLEY: Nothing further, your Honor.

12 THE COURT: Okay. Thank you, sir, you can step

13 down.

14 (Whereupon, at this time the witness was then

15 excused.)

16 No clients are normal, that would be a good thing

17 for the business card.

18 Okay, next witness for the defense.

19 MS. ROGERS: The NRA calls Michael Erstling.

20 He's a fact witness, so I think the court officer has to get

21 him.

22 THE COURT: Okay.

23 COURT OFFICER: Ready, your Honor?

24 THE COURT: Yes, sir. Welcome back, sir.

25 THE WITNESS: Thank you.

B. Blacker - by Defendant - Redirect/Ms. Rogers Page 3812

1 MICHAEL J. ERSTLING

2 called as a witness in behalf of the Defendant,

3 and after having been first duly sworn by the Clerk of the

4 Court, took the witness stand and testified as follows:

5 THE CLERK: State your name.

6 THE WITNESS: Michael J. Erstling.

7 THE CLERK: Spell your last name.

8 THE WITNESS: E-R-S-T-L-I-N-G.

9 THE CLERK: Thank you. You may be seated.

10 THE COURT: Counsel, you may proceed.

11 MS. EISENBERG: Good afternoon, your Honor.

12 THE COURT: Good afternoon.

13 MS. EISENBERG: Good afternoon, members of the

14 jury.

15 DIRECT-EXAMINATION

16 BY MS. EISENBERG:

17 Q Welcome back, Mr. Erstling. Please remind us what your

18 position is at the NRA?

19 A I am the director of finance at the NRA.

20 Q How long have you worked at the NRA?

21 A I started at the NRA in 2001.

22 Q Who is your supervisor at this point?

23 A Right now, I report to Sonya Rowling.

24 Q What are some of your responsibilities in your current

25 position?

B. Blacker - by Defendant - Redirect/Ms. Rogers Page 3813

1 A I am responsible for accounting operations. I am

2 responsible for budgeting. I am responsible for the preparation

3 of the 990 and any other duties as a side.

4 MS. EISENBERG: Thank you. Your Honor, may I

5 approach the witness to hand him a bottle of water?

6 THE COURT: Sure.

7 MS. EISENBERG: Thank you. I meant to do this

8 before.

9 (Handed to the witness)

10 THE WITNESS: Thank you.

11 Q About how many people report to you?

12 A Approximately, eight.

13 Q Let's talk a little bit about the period of in or

14 around the summer of 2018. What was your position at the NRA at

15 that time?

16 A I was the director of budget and financial analysis.

17 Q To whom did you report then?

18 A I reported to Rick Tedrick.

19 Q Did there come a time in or around early 2018 when

20 Mr. Spray joined the organization?

21 A Yes, I think it was in March of 2018.

22 Q And he became the treasurer and the CFO over the course

23 of that year; is that fair?

24 A Over the course of the year, yes, he became both of

25 those.

NYAG v  
NRA

February 8, 2024

B. Blacker - by Defendant - Redirect/Ms. Rogers Page 3814

1 Q In early 2018, did you have an opportunity to form an  
2 opinion about his leadership style?  
3 A I did.  
4 Q And how would you compare his leadership style to that  
5 of Mr. Phillips, his predecessor?  
6 A Craig was much more engaged in the day-to-day  
7 activities of the association. He was present. He was  
8 inquisitive. He asked tough questions. He made decisions. It  
9 was 180 degrees from Mr. Phillips.  
10 Q And in the five or so years prior to Mr. Phillips  
11 departure in 2018, with what frequency did you personally meet  
12 with Mr. Phillips?  
13 A Over the -- from 2015 to 2018, I don't think I ever met  
14 with Mr. Phillips. Prior to that, it would be maybe two to  
15 three times for budget purposes.  
16 Q Did there come a time when you and your colleagues  
17 started to have regularly scheduled meetings in 2018?  
18 A As soon as Craig started, we were having regular  
19 monthly meetings. It was myself, Sonya Rowling, Emily Cummins,  
20 Rick Tedrick, and Lisa George.  
21 Q What type of discussion did you have in those  
22 meetings?  
23 A We -- we discussed the financial results. We discussed  
24 budgeting, insurance, risk, accounting, whatever the topic was  
25 of the day, of the month, we were all talking about it. So, we

Page 3816

1 A Yes. We started to -- we started to compare notes.  
2 We started to, you know, put the puzzle together to a  
3 certain degree where prior we were -- we may not have been  
4 sharing all information that we had. By sitting around a round  
5 table and sharing, we were able to start to put the puzzle  
6 together, to try to figure out what was going on.  
7 Q And as you started to do that, did you personally  
8 arrive at new realizations about the state of compliance at the  
9 NRA?  
10 A Yeah, it was -- the -- the scope was getting larger  
11 every time we met.  
12 So, there was -- there were significant problems. I  
13 don't think any one of us knew individually how big the issue  
14 was until all of us were sitting around talking about it.  
15 (Continued on next page)

B. Blacker - by Defendant - Redirect/Ms. Rogers Page 3815

1 were all sharing information.  
2 Q And prior to Mr. Spray's arrival, did you and the  
3 individuals you listed hold regularly scheduled meetings or  
4 randomly scheduled meetings?  
5 A We definitely did not hold regularly scheduled  
6 meetings. We would definitely talk in the office, but it  
7 wouldn't be all of us together at one time. So, there was no  
8 group thing. It was just one or two of us meeting to talk about  
9 an issue, but it wasn't a complete 360-degree view of the  
10 organization.  
11 Q As you started to attend these meetings, these  
12 regularly scheduled meetings that Mr. Spray organized, did there  
13 come a time when you expressed certain concerns about certain  
14 transactions, expenditures or the like?  
15 A So, my personal experience was I was frustrated. I had  
16 seen a great deal of large transactions, large invoices, very  
17 little detail. There were other concerns of transactions that,  
18 I mean, were being approved and, also, at that time concealed  
19 carried initiative was ramping up; and the invoices for that  
20 were absolutely enormous.  
21 All they said was three letters, CCI, and they were  
22 half a million dollars, three hundred thousand dollars. They  
23 were big, and so that was troubling.  
24 Q Did you share this concern with Mr. Spray and others  
25 who attended those meetings?

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3817

1 Q And at the time -- at the time what were the various  
2 responsibilities of the various individuals in the meeting?  
3 A So at that time I was working on budget and financial  
4 forecasting and analytics. Sonya Rowling was accounting  
5 operations. Emily Cummins was risk and insurance and tax. Lisa  
6 George was purchasing, and I think that names them.  
7 Q Thank you, Mr. Erstling.  
8 Did there come a time when you and certain of your  
9 colleagues made a presentation about these concerns to the NRA's  
10 Audit Committee?  
11 A So out of --  
12 Q Just yes or no.  
13 A Yes. Sorry.  
14 Q And what role, if any, did Mr. Spray have in that  
15 meeting in connection with that meeting?  
16 A So Craig could see that we were frustrated and he  
17 suggested that we come forward and bring these -- bring these  
18 issues up to the Audit Committee.  
19 Q Leading up to the meeting of the Audit Committee, did  
20 you and others corroborate on preparing a list of top concerns  
21 to discuss with the committee?  
22 A Yes. So we -- we met -- we met off line off of the  
23 standard Craig meeting. We met in Sonya's office, and I  
24 provided my few items, and Lisa provided her couple of items,  
25 and Sonya provided her items. Portia Padilla who was our

NYAG v  
NRA

February 8, 2024

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3818

1 accounts payable manager provided some information about some of  
 2 these items, and then Emily sent a document of her concerns and  
 3 so Sonya consolidated all of those concerns on to the Top  
 4 Concerns memo.  
 5 Q Let's take a look at PX 2605 which is in evidence.  
 6 Let's go to the second page of the exhibit.  
 7 Mr. Erstling, is this the document that you were just  
 8 testifying about?  
 9 A Yes, ma'am.  
 10 Q Leading up to the meeting on July 30, 2018 with the  
 11 Audit Committee, did you have any meetings with Mr. Frazer about  
 12 any of your concerns?  
 13 A Yes. John was trying to understand some of the  
 14 financial transactions that were presented in this list.  
 15 Q Please tell us what happened at the meeting.  
 16 A We -- we talked about specifically the Grassroots  
 17 Behavioral item number 4B which dealt with some accounts payable  
 18 for the National Rifle Association to PM Consulting that  
 19 remained on the Association's books after PM Consulting was sold  
 20 to MMP and that those accounts payables were never written off.  
 21 They just remained there. And then accounting operations was  
 22 instructed to slowly pay that accounts payable off over a period  
 23 of years at a think it was like 20,000 increments.  
 24 Q Instructed by whom?  
 25 A I believe it was Woody Phillips.

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3819

1 Q Did you also share with the Audit Committee your  
 2 concerns about payments to ATI or Associated Television for  
 3 rental of a house?  
 4 A Yeah. I saw those -- those invoices come through, and  
 5 I obviously did my own Google search of the address and found  
 6 out who the property was owned by, and I -- I brought it up as  
 7 an issue. You know, the invoice itself was not descriptive. So  
 8 I mean, if it was truly the rental of that house, then we paid a  
 9 lot of money for that rental. If it was for something else,  
 10 then why wouldn't you have put what it was for. Why did you  
 11 have to hide that it was for lights and cameras and stuff like  
 12 that. I don't understand.  
 13 Q Do you have an understanding as to who had authorized  
 14 payments for this in the past?  
 15 MR. FARBER: Objection, your Honor. And is it  
 16 firsthand knowledge or what he was told?  
 17 THE COURT: I mean, you're here as a fact witness,  
 18 so it should be things that you observed or know. Not  
 19 speculating.  
 20 MR. FARBER: Judge, I would object to know. People  
 21 know things from hearsay.  
 22 THE COURT: Well, that's a fair point. The -- in  
 23 the first instance, the question is whether you have  
 24 personal knowledge.  
 25 A Can you ask the question one more time.

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3820

1 Q Yes. To the extent or someone had caused the NRA to  
 2 make payments for Associated Television for the rental of the  
 3 house before you brought this concern to the Audit Committee's  
 4 attention, do you have firsthand knowledge regarding who  
 5 authorized those payments?  
 6 A I don't have -- I don't have knowledge of who  
 7 authorized them. I have knowledge who signed them.  
 8 MR. FARBER: Your Honor, that's the question.  
 9 Q Do you have knowledge about whose name appeared on the  
 10 approval portion of the paperwork?  
 11 A I do.  
 12 Q And what was that?  
 13 MR. FARBER: Again, your Honor. Just reading the  
 14 document is not appropriate.  
 15 THE COURT: Is that a document that's in evidence?  
 16 MS. EISENBERG: I don't have it handy, your Honor.  
 17 Maybe.  
 18 MR. FARBER: It's not appropriate to ask a question  
 19 what his knowledge is of a document. If it's in evidence,  
 20 it's in evidence.  
 21 THE COURT: I disagree. I mean, if it's -- if the  
 22 document is hearsay and not admissible, then you might be  
 23 right; but the document has been admitted. So maybe at some  
 24 point during this you can confirm that before the witness  
 25 answers that.

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3821

1 MS. EISENBERG: Certainly, your Honor.  
 2 Q Let's take a look at item two, Mr. Erstling. It refers  
 3 to senior management override of internal controls.  
 4 Do you see that?  
 5 A Yes, ma'am.  
 6 Q And then there is a listing at the top of five  
 7 different procedures or policies that you were telling the Audit  
 8 Committee were being overridden. And let's just go through that  
 9 list. What are they? Accounts payable procedures, IST  
 10 purchasing policies.  
 11 What does "IST" refer to?  
 12 A Information Technology or Information Services  
 13 Technology.  
 14 Q Okay. Travel and expense reporting policy, procurement  
 15 contract policy, HR policy.  
 16 And when Mr. Thompson asked you questions about this  
 17 document, the first time you testified in this trial, you  
 18 testified that item 2b as well as item 2c is something that you  
 19 personally contributed to this list.  
 20 Do you recall that testimony?  
 21 A Yes, ma'am.  
 22 Q So let's focus on item 2b that talks about Lance  
 23 Olson's invoices.  
 24 To the extent you believe -- well, let me just confirm.  
 25 Did you believe that the payment of those invoices

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3822

1 constituted overrides by senior management of internal controls?  
 2 MR. FARBER: Objection, your Honor. His belief  
 3 about whether something constitutes an override or not is  
 4 not proper testimony.  
 5 THE COURT: Overruled.  
 6 A I believe that this -- this overrode internal controls.  
 7 Q And who is -- whom specifically, if you know, overrode  
 8 those controls?  
 9 A Well, Josh Powell and Woody Phillips' signatures are on  
 10 all of the documents associated with this purchase.  
 11 Q Let's go to item 2c. It refers to Josh Powell's  
 12 purchases of computer assets.  
 13 Do you see that?  
 14 A I do.  
 15 Q Who was the senior manager who overrode internal  
 16 controls with regard to item 2c?  
 17 A Josh Powell.  
 18 Q Items 2a and 2d are not something that you previously  
 19 testified you contributed to the list. But let me ask you about  
 20 2a, whether once it was added by one of your colleagues you  
 21 agreed that this particular transaction was an issue that should  
 22 be reported.  
 23 MR. FARBER: Objection, your Honor.  
 24 THE COURT: Overruled.  
 25 A I agree that -- I was on the floor when this

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3823

1 transaction came down, and I witnessed it, and I agree that this  
 2 was a total override of controls.  
 3 Q Who was the senior manager or senior managers who  
 4 overrode internal controls?  
 5 A In this case, it was Woody Phillips and then also it  
 6 was handed down by Craig Spray as well.  
 7 Q And what about item 2d that refers to hiring of staff  
 8 without HR knowledge.  
 9 In your opinion was that another instance of senior  
 10 management overriding internal controls?  
 11 A Yes, and that was Josh Powell hiring people left and  
 12 right.  
 13 Q Let's take a look at item three. It refers to  
 14 management's subordinating its judgment to vendors. It states  
 15 decisions are made in the best interest of vendors.  
 16 When Mr. Thompson questioned you about this document,  
 17 you didn't identify number 3 as a item that you personally  
 18 contributed to the list. But the same question. Once it was  
 19 added to the list, did you agree with your colleagues that this  
 20 was a concern?  
 21 A Yes.  
 22 Q Which management subordinated its judgment to vendors?  
 23 A In the case that I'm thinking about, it would have been  
 24 Wayne LaPierre and Woody Phillips.  
 25 Q When you -- we can take down the document.

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3824

1 When you presented the concerns with the Audit  
 2 Committee, was that the first time you ever met with the Audit  
 3 Committee about these concerns?  
 4 A Yes.  
 5 Q And as far as you know, was it the first time the other  
 6 individuals who came with you were meeting with the Audit  
 7 Committee about their concerns?  
 8 A As far as I know, yes.  
 9 Q How would you characterize their reaction of the Board  
 10 members at the meeting?  
 11 A I thought that the three that remained were engaged.  
 12 They asked questions. They were receptive to not only the list  
 13 that was sent to them early but some additional items that we  
 14 brought forward in that meeting specifically that weren't even  
 15 on that list, and so we brought those as well. So they were  
 16 asking questions.  
 17 They were -- you know, I know Curtis Jenkins seemed mad  
 18 about it. They were -- they were interested.  
 19 Q And when you say that Mr. Jenkins seemed mad, in what  
 20 respect did he seem mad? Was he mad at you or was he mad about  
 21 what you were reporting?  
 22 A He was mad about what we were reporting. I mean, he  
 23 -- I think he was a bit flabbergasted.  
 24 Q You previously talked about how once you started to  
 25 have meetings organized by Mr. Spray with Lisa George and Sonya

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3825

1 Rowling and others sort of knew things or things kind of came  
 2 together, you pieced together certain things that previously you  
 3 hadn't.  
 4 So would it be fair to say that you began to have an  
 5 understanding of sort of the magnitude of some of the issues?  
 6 A That's a very good, fair understanding. I mean, each  
 7 one of us brought, you know, two or three or four items to this  
 8 list. But then when you put the list together and you see its  
 9 length and complexity, it sort of opens your eyes; right.  
 10 I mean, like one thing doesn't -- doesn't make you say  
 11 oh, you know, that's horrific; right. But when you look at the  
 12 totality of what was happening, it was bad.  
 13 Q Who, if anyone, at the NRA prior to Craig Spray's  
 14 departure would have been in a position to understand the  
 15 magnitude of these issues?  
 16 MR. FARBER: Objection, your Honor.  
 17 THE COURT: Sustained.  
 18 Q Do you think that Mr. Phillips knew about these  
 19 concerns and these issues?  
 20 MR. FARBER: Objection, your Honor. He is asking  
 21 for his opinion about his mental state, what was in his  
 22 mind.  
 23 THE COURT: Yeah. If you can ask it just focusing  
 24 on fact witness, what he knows on personal knowledge.  
 25 Q Do you know facts that would enable you to form a

NYAG v  
NRA

February 8, 2024

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3826

1 belief on whether or not Mr. Phillips knew about these issues  
 2 and their magnitude?  
 3 MR. FARBER: Objection, your Honor. She can ask  
 4 specific questions about specific facts.  
 5 THE COURT: Sustained.  
 6 Q Who was the contact person at the -- or persons at the  
 7 NRA for the vendors that are listed in the Top Concerns memo?  
 8 A As far as Ackerman McQueen, it would have been Wayne  
 9 LaPierre and Woody Phillips. For ATI, it would have been Wayne  
 10 LaPierre and Woody Phillips. For PM Consulting, it would have  
 11 been Wayne LaPierre and Woody Phillips.  
 12 Q What about McKenna?  
 13 A That would have been Josh Powell, and I don't know what  
 14 -- what the other two knew about McKenna.  
 15 Q In or around that time for a payment to go out, is it  
 16 fair to say that someone at the NRA had to approve the payment?  
 17 A Yes. Over \$50,000 invoices, there has to be two  
 18 officers signatures.  
 19 Q And in your position at the time did you have occasion  
 20 to go review approvals to see who was approving payments to  
 21 these vendors?  
 22 A Yes.  
 23 Q Who were those individuals?  
 24 A Mostly Rick Tedrick for Wilson Phillips, John Frazer,  
 25 Josh Powell. On a rare occasion, Wayne LaPierre, but it wasn't

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3827

1 very often.  
 2 Q Let's go back to July 30, 2018.  
 3 After the meeting with the Audit Committee, did things  
 4 happen at the NRA that you considered to have improved its  
 5 efforts to comply with laws, regulations and internal policies?  
 6 A There were a lot of things that changed after the  
 7 meeting.  
 8 Q And just before we get into those, how quickly did you  
 9 start to observe change?  
 10 A Within a week.  
 11 Q Please tell us about some of the changes.  
 12 A So I would categorize the changes into sort of four  
 13 different groups. There were changes to vendors. There were  
 14 changes to employees. There were changes to systems, and there  
 15 were changes to what I will call education or compliance.  
 16 So the changes, and these happened -- these started  
 17 quickly. So the vendor one started immediately. The others  
 18 over the -- over the period, you know, three, four, five years  
 19 these other things have been continuing to change.  
 20 So but starting with the vendors, within a week. We  
 21 had sent out a letter to 200 of the top vendors at the NRA and  
 22 said hey our policy is that you have to have detail on your  
 23 invoice, and if you can't provide that, then we are not going to  
 24 be able to do business with you. So we allowed them to try to  
 25 correct the issue. If they weren't able to correct the issue,

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3828

1 we ended the relationship.  
 2 We removed any type of out-of-pocket expense associated  
 3 with NRA travel and that no longer went through Ackerman McQueen  
 4 or an outside vendor, so we brought that in-house.  
 5 We started to move vendors out of EVP and out of public  
 6 relations and put them where they belong. So if a particular  
 7 consultant or contractor was working on general operations work  
 8 or they were working on publications work or they were working  
 9 on advancements work, we took them out of the EVP office and we  
 10 put them in the area of responsibility for whatever work they  
 11 were doing. And what that does is it creates accountability,  
 12 right, so that the manager of that particular area is now  
 13 accountable for that contractor; what are they doing, are they  
 14 working, are they providing benefit to the association. And if  
 15 they are not, they were then eliminated. So those are some of  
 16 the things that occurred on the vendor side.  
 17 On the employee side, we started to dig in to expense  
 18 reports and start to look for anything that might be personal in  
 19 nature. And if we found that, then we asked for reimbursement.  
 20 And if reimbursement wasn't made, they were terminated.  
 21 Then on to the systems side, there were three -- three  
 22 systems that were instituted. One was a change in how we  
 23 reported monthly financials.  
 24 So prior to 2018 we would send out the monthly  
 25 financial statements in paper format. So we printed everything

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3829

1 off. We, you know, collated it with the general ledger detail,  
 2 and we put it in an interoffice envelope and mailed it out  
 3 interoffice, but we were able to digitize that. So we were able  
 4 to add a component to our accounting system where it sent an  
 5 electronic picture of your income statement and all your detail  
 6 and you could drill down on that.  
 7 So each manager could look at their phone wherever they  
 8 were and see their financial statements, and you could drill  
 9 down on a variance. And say, oh, why is this big or little or  
 10 what's going on with the variance there. Why is this going up  
 11 or down?  
 12 The next thing we instituted was PN3. So PN3 is a  
 13 software that enables us to track invoices as they come in to  
 14 the Association. So they come in to an email box. They get  
 15 sort of imported into PN3, and PN3 then routes that invoice to  
 16 the appropriate person and gets their approval so you can track  
 17 the approval process all the way along. No invoices get lost,  
 18 and there is record within PN3 of exactly who approved whatever  
 19 invoice.  
 20 And the last thing we instituted was purchasing KYX's  
 21 C-Track. It's a software. Completes the 990. It's similar to  
 22 a Turbo Tax, but it's for Associations, and what it does, it  
 23 allows you when you input information on one schedule, it might  
 24 bring it over to another schedule, wherever it's pertinent, but  
 25 it also does a lot of cross checks to allow you to make sure

NYAG v  
NRA

February 8, 2024

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3830

1 that you have accuracy across different schedules.  
 2 And the final grouping is compliance and education.  
 3 MR. THOMPSON: Your Honor, just narrative.  
 4 THE COURT: Overruled.  
 5 A Was the compliance software, the compliance  
 6 presentation.  
 7 So we started to give compliance presentations to sort  
 8 of teach everybody the stuff that they should have known; right.  
 9 So what are the rules? What are -- what are the policies?  
 10 Where do you need to be looking when you do a transaction, when  
 11 you make a contract? What do you need to be doing for that  
 12 process to work?  
 13 I was part of giving those compliance seminars. I gave  
 14 the compliance seminar portion related to purchasing and related  
 15 to what authority you needed, what signatures you needed on  
 16 purchases, and that's ongoing. Education is ongoing. You have  
 17 to keep teaching people over and over and over again. You can  
 18 never stop.  
 19 And on top of that, we did -- the Board revised the  
 20 travel and reimbursement policy. We have new procedures for  
 21 travel and reimbursement policy.  
 22 The purchasing policy has been -- procedures have been  
 23 updated, and we continue to educate people. What are the rules?  
 24 What do you have to follow?  
 25 Q Thank you very much, Mr. Erstling. Let's go back to PX

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3831

1 2605, the second page.  
 2 Directing your attention to the second item that refers  
 3 to "Senior Management Override of Internal Controls."  
 4 Mr. Erstling, is it fair to say that you and your  
 5 colleagues used this memo to communicate your concerns to the  
 6 Audit Committee on July 30, 2018?  
 7 A Yes.  
 8 Q And in so far as the words "Senior Management Override  
 9 of Internal Controls" were used, to who were you referring when  
 10 you used the word "senior management" there?  
 11 A That would be Wayne LaPierre, Woody Phillips and Josh  
 12 Powell.  
 13 Q Directing your attention to item three which refers --  
 14 states that management has subordinated its judgment to vendors.  
 15 To the extent this was another concern that you  
 16 communicated to the Audit Committee, when you used the word  
 17 "management" there, to whom were you referring?  
 18 A Wayne LaPierre, Woody Phillips, Josh Powell.  
 19 Q Let's talk a little bit about the budgeting process  
 20 leading up to the July 30 presentation.  
 21 Did you have any concerns about the timing of the NRA's  
 22 budgeting process relative to the timing of the budgeting  
 23 process with Ackerman?  
 24 A Yes. So --  
 25 MR. FARBER: Objection, your Honor. He's answered

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3832

1 the question.  
 2 Q Please tell us about the nature of that concern.  
 3 A The budgeting process at a very high level starts in  
 4 July. We -- we work towards a goal of getting a budget prepared  
 5 and approved by senior management in and around the week of  
 6 Thanksgiving. And so once that's been approved, we send that  
 7 budget -- that approved internal budget to the Finance Committee  
 8 for review at the December Finance Committee meeting.  
 9 And then that NRA budget is then -- you know, if there  
 10 are any changes, those changes occur, and we again, send it out  
 11 in early January for the January 6 or 7 Finance Committee  
 12 meeting. And then if they approve it, then it goes to the full  
 13 Board for approval. On a parallel track, there are meetings  
 14 taking place between the NRA and Ackerman McQueen where they  
 15 also are figuring out what their budget is going to be for the  
 16 next year. Next fiscal year.  
 17 That budget -- that Ackerman McQueen budget is then not  
 18 incorporated into the NRA's budget so that -- that budget is  
 19 taking the -- the Ackerman McQueen budget, the timing of that is  
 20 late November, early December at the same time that our budget  
 21 is going on.  
 22 And so what happens is you get to January, and the  
 23 NRA's budget is being approved by the Board, but it doesn't have  
 24 any of the adjustments or any of the projects or any of the work  
 25 that Ac-Mac is going to be doing for the next year within our

Erstling - by Defendant - Direct/Ms. Eisenberg Page 3833

1 own budget. And so you get to January's actual results, and you  
 2 start to compare the NRA's budget to actual, and there are  
 3 variances all over the PR budget where Ackerman is involved  
 4 because the budget's not the same. It's different.  
 5 (Continued on the following page.)  
 6  
 7  
 8  
 9  
 10  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

NYAG v  
NRA

February 8, 2024

M. Erstling - by Defendant - Direct/Ms. Rogers Page 3834

1 Q Who at the NRA caused this issue?

2 MR. FARBER: No foundation, your Honor?

3 Q When Ackerman and the NRA negotiated the budget, who at

4 the NRA participated in that process?

5 A There were two people that were the contacts for the

6 Ackerman McQueen relationship, and that was Wayne LaPierre and

7 Woody Phillips. I wasn't in the room. I don't know who was

8 sitting there.

9 Q And when the Finance Committee was presented with a

10 budget for its approval, who amongst management presented the

11 budget for the Committee's approval?

12 A Woody would have initiated the meeting, and he would

13 have given an overview. Wayne would have spoken, and then each

14 of the department heads would have spoken at that meeting.

15 Q Switching topics a little bit.

16 What is your understanding as to the meaning of the

17 term 501(c)(4) Organization?

18 A A 501(c)(4) is a social welfare organization that

19 files -- that is a nonprofit, nontaxable, nonfederal taxable

20 organization by IRS code.

21 Q Is the NRA a 501(c)(4)?

22 A Yes, ma'am.

23 Q What type of organization is the NRA Foundation?

24 A That's a 501(c) charitable organization.

25 Q Did the NRA receive 501(c)(3) funds from the Foundation

M. Erstling - by Defendant - Direct/Ms. Rogers Page 3835

1 in 2015 through present timeframe?

2 MR. THOMPSON: Objection. Relevance, your Honor.

3 THE COURT: Overruled.

4 A Yes, ma'am.

5 Q When the NRA received or is receiving funds from the

6 Foundation, how can the funds coming in from the Foundation be

7 used by the NRA?

8 A There are different levels of restriction; but the

9 overarching goal is that (c)(3) funds can only be used for

10 (c)(3) programs. Further restricting it could be money may be

11 restricted to competitions, or money may be restricted to the

12 Eddie Eagle Gun Safe Program, or it could be restricted to our

13 Youth Hunter Education Challenge.

14 So, those monies could be further restricted, but

15 they're still restricted to (c)(3) programs.

16 Q Who at the NRA has been responsible since at least 2015

17 for ensuring that (c)(3) funds coming in from the Foundation are

18 accounted for appropriately and spent only for the types of

19 services that you just referenced?

20 A Me.

21 Q How have you done that?

22 A (C)(3) accounting-wise, in the accounting system we set

23 up cost centers. A cost center or a profit center, it's just a

24 code. It is a series of numbers.

25 So, each-- each cost center has a five digit code. So,

M. Erstling - by Defendant - Direct/Ms. Rogers Page 3836

1 with this example right now, the NRA Museum, the cost center

2 number is 40685; and so any expenses associated with the museum,

3 whether that be salaries and benefits, whether it be supplies

4 and materials, whether it be travel, we would code those

5 expenses to 40685. And so when money comes over from the

6 Foundation and it is restricted to a (c)(3) program, well, the

7 museum counts as a (c)(3) program. If it was restricted to just

8 museum, well, I could put it in museum.

9 And so each program within general operations that is a

10 (c)(3) program, it's educational, it is for the public, they

11 fall in a specific cost center and they have a specific cost

12 center number, and that's how we keep each column separated from

13 the next.

14 And so when the money comes over from the Foundation,

15 when we request money from the Foundation, we request it in

16 those particular buckets. So, I may request \$125,000 to cover

17 the expenses and allocations to the museum from the Foundation,

18 and the Foundation would send if they approved 125,000.

19 I might request for the Eddie Eagle Gun Safe Program

20 that we send out \$25,000 worth of material across the country.

21 I might request \$25,000 of Eddie Eagle money to be granted over

22 to the NRA, and so I keep those things separate by their

23 accounting code on the ledger.

24 Q Were there any other steps you took to ensure that

25 (c)(3) funds coming from the Foundation were spent only for the

M. Erstling - by Defendant - Direct/Ms. Rogers Page 3837

1 designated purposes like the museum, Eddie Eagle, Refuse to be a

2 Victim, et cetera?

3 A I mean, that's the analysis that I do on a monthly

4 basis. So, I am pulling information directly from the general

5 ledger, right from our accounting software. I place it into

6 this -- this model, this spreadsheet and it gives me a column

7 for each and everyone of those (c)(3) programs.

8 And so when I make my request to the Foundation, I

9 provide -- I provide the Foundation with that spreadsheet and

10 with the detail behind it showing the ledger and the expenses to

11 the Foundation to approve that request.

12 MS. EISENBERG: Thank you, Mr. Erstling. No

13 further questions at this time.

14 THE COURT: Any other direct testimony?

15 MR. CORRELL: I'll pass the witness, your Honor.

16 MR. FARBER: No direct, your Honor.

17 DIRECT-EXAMINATION

18 BY MR. FLEMING:

19 Q Hello, Mr. Erstling. How are you?

20 A Good, thank you.

21 Q So, I have some questions and you seem like the right

22 person to get granular with.

23 So, you testified about approving payments to vendors.

24 Do you recall?

25 A Yes.

NYAG v  
NRA

February 8, 2024

M. Erstling - by Defendant - Direct/Ms. Rogers Page 3838

1 Q Can you explain to the jury the process by which an  
2 invoice comes in and payments are approved ultimately?  
3 A So, today we request that payments are e-mailed as a  
4 PDF into an e-mail box called AP Invoices.  
5 THE COURT: You say payments, you mean invoices  
6 e-mailed?  
7 THE WITNESS: Invoices. So, invoices are sent in  
8 to an e-mail box called AP Invoices.  
9 From there, PN3 will import that PDF into the  
10 system and so that's step one.  
11 Step 2 is the AP group will then take a look at  
12 that invoice and they will enter in whatever type of  
13 information they can as far as the vendor name and address  
14 and the like, and then they look on that invoice for who the  
15 owner is of that particular invoice.  
16 Q That's where I want to stop you, if you don't mind to  
17 go through it.  
18 A No worries.  
19 Q When you say owner of an invoice, what do you mean?  
20 A In some cases it's really simple because it might say  
21 in the address, it might say Mike Erstling NRA; and so right  
22 there they can say, oh, look, that belongs to Mike. Let me  
23 route that to Mike for approval.  
24 Q Okay, but is owner of the invoice in any way related  
25 to the person who contracted for the services, for instance?

M. Erstling - by Defendant - Direct/Ms. Rogers Page 3839

1 A Not always, not always.  
2 Q Okay. Is that person; that is, the person who  
3 originated the contract or ordered -- asked for the services,  
4 does that person get routed the invoice at all?  
5 A Um, they should. At some point, at some point in the  
6 routing if let's say -- let's say a junior, a manager, a manager  
7 gets the invoice; they have the ability to route that to a more  
8 senior manager in their own department for approval as well.  
9 So, it tracks those steps all the way through. So, it  
10 depends on what their authority is to sign off on a particular  
11 invoice.  
12 Q Okay, but if I worked at the NRA and I ordered 100  
13 widgets and the invoice comes into AP invoices, would I expect  
14 to see that invoice?  
15 A You should.  
16 Q Okay. And once the person in my position gets the  
17 invoice, what input if you know do they then provide and who do  
18 they provide it to?  
19 A So, the invoice would pop up on their screen if they're  
20 in the software, and they might be asked to code that invoice,  
21 to provide that five digit cost-center code that we talked about  
22 the GO a couple minutes ago; they might be asked to put that  
23 code. In they might be asked to put an account in, office  
24 supplies, fulfillment supplies and then they would be asked to  
25 either approve it or approve and forward to the next person for

M. Erstling - by Defendant - Direct/Ms. Rogers Page 3840

1 their approval as well.  
2 Q Okay, and when they approve it -- let's assume they  
3 approve it -- are they saying yes, I ordered this, and yes, I  
4 received it?  
5 A They should be, yes.  
6 Q And are they also saying that yes, this is the price I  
7 agreed to?  
8 A Yes.  
9 Q And then after they do that, where does it go?  
10 A It depends on the size, right? So if -- if the size is  
11 small, let's say under 50,000 -- we'll just go with that easy  
12 one -- and the person approved it last had the authority to  
13 approve up to that level, then it just returns back to AP for  
14 payment.  
15 Q Okay. So, if -- now, let's take a different level.  
16 Let's say it is over a hundred thousand. Where does it go?  
17 A So, let's say we have a show of exhibits. So they have  
18 a \$105,000 invoice, and so John Bailey goes ahead and he signs  
19 off on it; and he would send it to Lisa Supernaugh and Lisa  
20 Supernaugh would go ahead and she would approve it. And then it  
21 would go -- the next step would go to the treasurer's office,  
22 and the treasurer would sign off on it because it is over  
23 \$50,000.  
24 And then once the treasurer signs off on it, she'll  
25 send it to John Frazer, and John Frazer will sign off on it

M. Erstling - by Defendant - Direct/Ms. Rogers Page 3841

1 because it needs two -- two officers' signatures.  
2 Q Let me stop you. I had understood that that process  
3 you just described for invoices between 50 and 100, am I wrong  
4 about that?  
5 A It is over 50,000.  
6 Q Over 50, okay. And when it goes to the treasurer's  
7 office and then to Mr. Frazer for signature, do they usually  
8 have any original or primary understanding of that invoice or  
9 that service that was provided?  
10 A I don't know what knowledge they would have. If it's  
11 a contract or any type of contract they would have seen a  
12 contract, right? Because through the contract process, the  
13 approval of that has the signature of the treasurer and the OGC.  
14 So, they would have known about it they way.  
15 Q Now, by the time the treasurer and Mr. Frazer received  
16 this invoice, is it true that the originator of the service --  
17 me in the example I asked you -- would they know that I have  
18 already approved that, yes, I ordered those services; yes, I  
19 received them; yes, that's the price I contracted for?  
20 A It would show up in PN3 that you've signed off on it.  
21 So, they would see that the trail of prior signatures going down  
22 the list, yes.  
23 Q Okay. Next topic and last topic: You talked about  
24 compliance and education being a critical function of the NRA  
25 now; is that right?

NYAG v  
NRA

February 8, 2024

M. Erstling - by Defendant - Direct/Ms. Rogers Page 3842

1 A Yes.

2 Q And you were talking in the sort of post-whistleblowing

3 Top Concerns Memo period; is that right?

4 A That's correct.

5 Q Now, is it true that the first compliance refresher

6 seminar was given actually prior to July 30, 2018?

7 A It may have been. I just don't remember the timing of

8 the exact date.

9 Q Okay, and then chronologically, last question. All of

10 that, the 2018 whistleblowing, the Top Concerns Memo, the

11 compliance refresher and all of these reactions that took place

12 according to your testimony within a week occurred prior to

13 2019; isn't that right?

14 A Not all of them, but a lot of them, yes.

15 Q And that was prior to the New York Attorney General's

16 investigation; isn't that right?

17 A I believe so, yes.

18 MR. FLEMING: Thanks so much.

19 THE COURT: All right, we're going to take our

20 break, and we'll reconvene at 2:15.

21 COURT OFFICER: All rise, jury exiting.

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

23 courtroom.)

24 THE COURT: Mr. Erstling, as last time, during the

25 break, you're still on the stand so you shouldn't discuss

Proceedings Page 3844

1

2 AFTERNOON SESSION

3 \* \* \* \* \*

4 THE COURT: The jury is ready. Are you all

5 ready?

6 MR. FLEMING: Just as a quick housekeeping matter

7 really. I had spoken to the Attorney General about

8 stipulating to certain exhibits, primarily all 990s and also

9 secretary's reports; and I haven't heard back and I'm not

10 pressing them for an answer, but I just wanted to raise the

11 issue because I think at some point it would be very

12 effective to make sure that all these documents were in

13 instead of rather than have belabor --

14 THE COURT: I'd be surprised if all 990s haven't

15 been put in already.

16 MR. FLEMING: Well, 990s of importance go back to

17 2008, at least for our case and I wanted to get all the '08

18 through '14. I think you're right, 15 through 22 are in.

19 THE COURT: The '08 through '14 are relevant?

20 MR. FLEMING: Into the history and treatment of

21 certain items that are in issue here.

22 THE COURT: Okay, and the 990s and the secretary's

23 reports are presumptively admissible as either business

24 records or public filings, right?

25 MR. FLEMING: Certainly, the 990s for sure. The

M. Erstling - by Defendant - Direct/Ms. Rogers Page 3843

1 your testimony with anyone, the substance of your testimony,

2 including counsel.

3 THE WITNESS: Thank you.

4 (Whereupon, at this time the witness stepped down.)

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

6 taken.)

7 \* \* \* \* \*

8 (Continued on next page)

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Proceedings Page 3845

1 secretary's reports are internal business records. They're

2 traditionally done every year. They're part of the standard

3 practice.

4 THE COURT: So, is there -- do you expect any

5 issues, issue about relevance or --

6 MR. THOMPSON: Relevance, your Honor, but we are

7 looking at it and we are going to respond to Mr. Fleming's

8 e-mail. We just figured Mr. Frazer was not going to be on

9 the stand today, and we had a little more time to look at

10 it.

11 THE COURT: And I had been generally been fairly

12 lenient with the before-and-after time period. In terms of

13 just broad relevance, as you probably saw in the

14 instructions, I'm going to tell them that the only thing

15 that ultimately matters are how things bear on the relevant

16 period; but that sometimes you learn things from prior

17 periods that's relevant and some things.

18 So, hopefully, you won't have an issue because

19 they're admissible in terms of hearsay and other kinds of

20 things. Let's wait and see if we have an issue. I'm

21 inclined to let them in, but --

22 MR. FLEMING: Just to be fully clear, 2008 I forgot

23 to mention is in already and, actually, I used it in

24 previous testimony. So you know for what it's worth.

25 THE COURT: And that was before your client was --

NYAG v  
NRA

February 8, 2024

Proceedings Page 3846

1 was the GC, right?

2 MR. FLEMING: That's right.

3 THE COURT: Okay. All right, I don't want to waste

4 any time on something that's probably not going to be an

5 issue.

6 So, let's get the jury.

7 MR. THOMPSON: Just one more quick housekeeping

8 item, your Honor.

9 THE COURT: Get the witness.

10 MR. THOMPSON: This is just about the closings. So

11 we are -- we're still working with the NRA to sort of

12 finalize the time allocation. There's just one discrepancy

13 that we're working on; but as far as we calculated the time,

14 we think the closings are probably going to need to start

15 Wednesday afternoon in order to finish by the end of day

16 Thursday.

17 We just want to see if that tracks with what the

18 defendants are thinking as well?

19 THE COURT: Well, how long are you all thinking for

20 closings? I mean, there's five hours in a court day, and so

21 we have to have breaks. Mr. Phillips wants an hour.

22 What does the AG want?

23 MR. THOMPSON: I think we're thinking approximately

24 two hours, your Honor.

25 THE COURT: That's your opening bid. I will accept

Proceedings Page 3847

1 that as --

2 MR. CORRELL: Your Honor, Mr. LaPierre will require

3 an hour.

4 THE COURT: Okay. Mr. Phillips, still an hour?

5 MS. ROGERS: The NRA would be looking -- I'm sorry.

6 THE COURT: Mr. Phillips, an hour?

7 MR. FARBER: As of now, but we may be less.

8 THE COURT: Mr. Frazer?

9 MR. FLEMING: Tough to say, your Honor, so I will

10 an hour. It could be less. It could trickle over.

11 THE COURT: And the NRA?

12 MS. ROGERS: We were thinking about ninety minutes

13 and we think -- we're still resolving our time discrepancy;

14 but if the AG takes two hours for closing, then we think

15 cross is pretty much done.

16 MR. CORRELL: The other concern, your Honor, is

17 Mr. LaPierre has not had an opportunity to present his case

18 in chief yet, and he is planning -- I'm planning to call him

19 on Tuesday. I have two experts and maybe one other witness,

20 and we have time allotted to do that.

21 THE COURT: Yeah, so your assumption in your time

22 allotments was that we would have through Wednesday for

23 evidence; but nobody completely dialled in on how long

24 closings would take.

25 So, I still want those done -- even if I back the

Proceedings Page 3848

1 AG down to ninety minutes, that still doesn't work for one

2 day, right?

3 MR. FLEMING: Well, your Honor, just one other

4 factor. By my understanding of the clock, before today the

5 attorney general is at 43 and a half hours. Two hours for

6 summation puts them at 45 and a half, doesn't include

7 whatever they have done today.

8 If they have no cross next week, then maybe that

9 quickens the day and frees up some time on Wednesday because

10 right now, I have an expert witness, as well. Mr. Frazer

11 may testify; and if we can eliminate cross so we know

12 there's no cross, it's a lot quicker.

13 THE COURT: Well, I'm not going to anybody in

14 advance. We'll just have to sort of see. I made a point at

15 the beginning, it is not a mathematical test here.

16 It's got to be equitable, but I do want to make

17 sure that especially the individual defendants who haven't

18 really -- that they have time. The NRA has, obviously, been

19 spending the time so far.

20 Well, look, my preference would be for all the

21 closings to be together on Thursday. I realize now that

22 would necessary -- require everybody to be much shorter to

23 be able to get all four of you in in four hours. If nobody

24 thinks that's reasonable, then it has to start Wednesday

25 afternoon.

Proceedings Page 3849

1 So, I'm going to let you all talk about it for now.

2 But, yeah, the question is what I'd like you to be able to

3 do is to get all the closings in in a total of four hours

4 and to just be more efficient. The jury has heard six weeks

5 of evidence, look, I get it. Summations are important, so

6 I'm aware of the AG's time expenditure.

7 So, unless you can figure out a schedule that gets

8 you down to four hours for closings, some closing is going

9 to have to start and it will be a defendant closing on

10 Wednesday afternoon.

11 MR. FARBER: Judge, I'll say for our part if the

12 Court is going to do this in four hours, we'll conform our

13 closing to do our portion of that. I mean, I would prefer

14 to have these all be in one day, as would the Court.

15 THE COURT: I would certainly. There's a lot to

16 summarize, but my experience watching you all is that time

17 constraints has more often than not improved the quality of

18 presentation. Not that the quality has been bad ever; but

19 the shorter crosses, for example, are not a lot of wasted

20 time, right to the point. Frankly, you have to sort of plan

21 that out.

22 I don't want to do a dicta that says it has to be

23 four hours and, basically, an hour a piece; but that's what

24 I would prefer and that would give the AG some more

25 flexibility on time for cross.

NYAG v  
NRA

February 8, 2024

Proceedings Page 3850

1 And it may be a little too flip for me to say this;  
2 but if you can't summarize it in an hour, that's a  
3 problem.  
4 MR. FARBER: Judge, what is the order of summations  
5 going to be?  
6 THE COURT: Well, I mean, the default is defense  
7 first and it goes the opposite of the openings. So, the  
8 defendants go first and then the plaintiff finishes, and the  
9 default, at least for jury selection which I guess I would  
10 apply is the caption, where normally the NRA is listed first  
11 and the same order that you've been sitting in that we would  
12 do it in that order, and then the four defendants go and  
13 then the plaintiff.  
14 MR. CORRELL: Your Honor, actually, the CPLR  
15 provides for closing in inverse order of opening. So --  
16 THE COURT: Inverse meaning the defendants first  
17 and then plaintiff.  
18 MR. CORRELL: Yes, so that would be Mr. Fleming  
19 would go first, Mr. Farber --  
20 THE COURT: I don't think it necessarily -- does it  
21 get as granular as that, that the opposite of the  
22 defendants?  
23 MR. CORRELL: I think it does, your Honor.  
24 THE COURT: Really?  
25 MR. CORRELL: I've been planning my closing in that

Proceedings Page 3852

1 to deal --  
2 THE COURT: Well, you're not getting squeezed by me  
3 because I made this point already, that you should have as  
4 much of the defense case as you feel like you need; and if  
5 you're not getting it, let me know.  
6 MR. THOMPSON: Your Honor, just to note that we  
7 have been building the two hours into our, like, how much  
8 time we have for cross.  
9 THE COURT: Get the witness.  
10 Look, like I said, you all know the rules; but the  
11 two hours doesn't work for us to have closings in one day.  
12 And the Wednesday start for closings is not consistent,  
13 maybe with how defendants are reasonably planning out when  
14 their witnesses are going to be allowed to be in and your  
15 case did take into the fourth or maybe even the fifth week.  
16 So, I have to give them some deference in terms of  
17 making sure they can put their primary witnesses in; and if  
18 that's the expense of you going from two hours of a closing  
19 to an hour and a half to an hour and fifteen, that's just  
20 the way it is.  
21 So, let's get the jury.  
22 (Whereupon at this time the witness,  
23 MICHAEL ERSTLING, having been previously duly sworn/affirmed  
24 by the Clerk of the Court resumed the witness stand and  
25 testified as follows:)

Proceedings Page 3851

1 order.  
2 MR. FARBER: The CPLR does say inverse. It does  
3 not --  
4 THE COURT: I'm not going to --  
5 MR. FARBER: -- anything beyond that.  
6 THE COURT: While we're worried about time, let's  
7 get the jury and get the witness, and we'll deal with the  
8 rest of all this.  
9 I want you to work on a time. Again, if the AG  
10 which has to do the entire case can do there's in an hour,  
11 that suggests to me that maybe a little more than an hour  
12 for them instead of just assuming a block of an hour. For  
13 each individual defendant there should be like  
14 forty-five minutes each and the NRA, which has a blank sort  
15 of an overview, maybe a little bit more.  
16 I'm not going to micromanage it yet, but I think  
17 the AG who has to cover the entire case would likely have a  
18 pretty good argument to have a little bit longer time than  
19 the individual defendants who are only arguing part of the  
20 case.  
21 MR. THOMPSON: Your Honor --  
22 MR. CORRELL: Your Honor, I respectfully disagree.  
23 So far my client has had one hour to the AG's ten, and we  
24 are feeling like we're getting squeezed already and to allow  
25 them more time in closings than Mr. LaPierre when he's had

M. Erstling - by Defendant - Cross/Mr. Thompson Page 3853

1  
2 COURT OFFICER: All rise, jury entering.  
3 (Whereupon, at this time the jury then entered the  
4 courtroom.)  
5 THE COURT: Welcome back. Please have a seat.  
6 All right, I think we left off just before  
7 cross-examination, right?  
8 Welcome back, Mr. Erstling.  
9 THE WITNESS: Thank you.  
10 THE COURT: Mr. Thompson, you may proceed.  
11 MR. THOMPSON: Thank you, your Honor.  
12 CROSS-EXAMINATION  
13 BY MR. THOMPSON:  
14 Q Good afternoon, Mr. Erstling.  
15 A Good afternoon.  
16 Q Just a few questions. Would you agree with me,  
17 Mr. Erstling, that all of the NRA funds must be used in  
18 furtherance of the NRA's mission?  
19 A I would agree that the funds should be used in the  
20 NRA's mission.  
21 Q And before the break when you were being questioned by  
22 Mr. Fleming, he was asking about the timing of the NYAG's  
23 investigation.  
24 Do you recall that?  
25 A I recall there was an investigation, yes. I don't

NYAG v  
NRA

February 8, 2024

M. Erstling - by Defendant - Cross/Mr. Thompson Page 3854

1 remember the exact dates.

2 Q Did you ever receive a document preservation notice in

3 connection with that investigation?

4 A Yes.

5 Q And do you recall that being in approximately April of

6 2019?

7 A I could agree with that. I don't know the -- again, I

8 don't know the exact date, but I know there was a preservation

9 and I know we're following that.

10 Q Okay. And if I can just to refresh your recollection,

11 Mr. Erstling, if I could hand up a document very quickly.

12 MR. THOMPSON: And I have copies here, as well.

13 THE COURT: Marked for identification so we know

14 what it is?

15 MR. THOMPSON: It is marked for identification as

16 Plaintiff's Exhibit 3584.

17 THE COURT: And you're not admitting this. This is

18 just for refreshing recollection?

19 MR. THOMPSON: Correct, your Honor.

20 Q And my question, Mr. Erstling, when you have the

21 document, does this refresh your recollection as to the timing

22 of the document preservation notice?

23 A Yes.

24 Q What does it refresh your recollection as to when the

25 preservation notice was issued?

Page 3856

1 the witness only, Plaintiff's Exhibit 2459.

2

3 THE COURT: So, the witness and counsel?

4 MR. THOMPSON: Witness and counsel, please.

5 This was Tab 8 of the Erstling binder. I'm not

6 sure if there was a binder for Mr. Erstling today. And if

7 there's no objection, I will move this into evidence.

8 (Continued on next page)

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

M. Erstling - by Defendant - Cross/Mr. Thompson Page 3855

1 A It was according to the document, which I believe I've

2 seen, is April 26, 2019.

3 Q And you were testifying about the new invoice software.

4 That's PM3?

5 A N as in Nancy.

6 Q N as in Nancy. When did the NRA begin using that

7 software, that program?

8 A That was probably 2018 to 21.

9 Q Okay. And then you were talking with Ms. Eisenberg

10 about the Top Concerns Memo and sought of the pace of change

11 after you spoke with the Audit Committee.

12 Do you remember that?

13 A Yes, sir.

14 Q And one of the items on the Top Concerns Memo concerns

15 Membership Marketing Partners; correct?

16 A Yes.

17 Q And the NRA renegotiated its agreement with Membership

18 Marketing Partners and Allegiance Creative Group in 2022?

19 MS. EISENBERG: Objection, outside the scope.

20 THE COURT: I can't remember.

21 MR. THOMPSON: Were discussing the Top Concerns

22 Memo and the timing things changed, your Honor, so this is

23 going to an item in the Top Concerns Memo.

24 THE COURT: Overruled.

25 MR. THOMPSON: And if we could please bring up for

Erstling - by Defendant - Cross/Mr. Correll Page 3857

1

2 A Yes. It appears about the right timing, yes.

3 Q And you received this email; is that right?

4 A Yes, I was on an earlier exchange.

5 Q If you look at the topmost email.

6 A July 29. I see my name, yes.

7 Q Okay. We can take that down. No further questions.

8 THE COURT: Okay. Anything further from the

9 Defense?

THE COURT: Cross-examination, yes? This is cross?

MR. CORRELL: Yes.

THE COURT: And cross next?

MR. FARBER: Perhaps.

THE COURT: Okay.

CROSS-EXAMINATION

KM

Erstling - by Defendant - Cross/Mr. Correll Page 3858

1 BY MR. CORRELL:  
 2 THE COURT: Okay. Mr. Correll, you can continue if  
 3 you can talk over the construction. We will try to keep our  
 4 mikes high.  
 5 Q Good afternoon Mr. Erstling. I am Kent Correll. I  
 6 represent Wayne LaPierre.  
 7 A Good afternoon.  
 8 Q And would you please direct your attention to Tab 18 in  
 9 your notebook.  
 10 A I don't have a notebook. I'm sorry.  
 11 MR. CORRELL: Could we bring Tab 18 up on the  
 12 screen.  
 13 THE COURT: Is that the notebook from last week?  
 14 MR. CORRELL: This is the Top Concerns memo.  
 15 THE COURT: But what notebook are we talking about?  
 16 Is there a notebook for this; Erstling exhibits? The one he  
 17 just testified from.  
 18 MS. EISENBERG: We identified a set we could have  
 19 used. Because I only used one document, I didn't bother  
 20 bringing a binder.  
 21 MR. CORRELL: It's PX 2605, Top Concerns memo.  
 22 THE COURT: I think it would be helpful for the  
 23 witness to have a copy of the binder so he can have a hard  
 24 copy to look at if he wants to. Okay.  
 25 But it's just the Top Concerns memo that we looked

Erstling - by Defendant - Cross/Mr. Correll Page 3859

1 at before.  
 2 MR. CORRELL: Yes, it is.  
 3 Q I would like to direct your attention if you would to  
 4 the third item on the list of Top Concerns for the Audit  
 5 Committee.  
 6 Next page, please. Third item.  
 7 A Yes, sir.  
 8 Q Did you write that statement?  
 9 A I did not.  
 10 Q Who did?  
 11 A I believe Emily Cummins wrote that.  
 12 Q Did you have any personal knowledge at the time this  
 13 was written as to whether management had subordinated its  
 14 judgment to vendors?  
 15 A I believe that Emily -- during our conversations --  
 16 MR. CORRELL: Objection, your Honor. Hearsay.  
 17 THE COURT: Well --  
 18 MR. CORRELL: This is a former.  
 19 MR. FARBER: This is a yes or no question, your  
 20 Honor.  
 21 Q So my next question is did she also write the part that  
 22 says "Decisions are made in the best interest of vendors?"  
 23 A She would have written the whole thing.  
 24 Q Okay. As you sit here -- well, at the time this was  
 25 written, did you have any personal knowledge as to whether any

Erstling - by Defendant - Cross/Mr. Correll Page 3860

1 decisions were being made in the best interest of vendors?  
 2 A I did not.  
 3 Q And at the time this was written, did you have any  
 4 personal knowledge as to whether management had subordinated its  
 5 judgment to vendors?  
 6 A I did not.  
 7 Q And as the time -- as of the time this was written, had  
 8 you ever spoken to Mr. LaPierre?  
 9 A Not about this, no.  
 10 Q And at the time this was written, did you go and talk  
 11 to Mr. LaPierre about any of your concerns?  
 12 A I did not.  
 13 Q Okay. Did Mr. LaPierre ever hold any assets for  
 14 charitable purposes pursuant to a will?  
 15 A I have no idea what you're talking about.  
 16 Q Okay. You talked about charitable assets before. Do  
 17 you remember testifying about that?  
 18 A Yes.  
 19 Q And you testified that there were restricted assets  
 20 that would come under your management.  
 21 Do you remember that?  
 22 A Yes.  
 23 Q Was Mr. LaPierre involved in that process of managing  
 24 the funds from the (c)(3) corporations?  
 25 A No.

Erstling - by Defendant - Cross/Mr. Correll Page 3861

1 Q Did you know that Ackerman McQueen tried to fire Craig  
 2 Spray shortly after he was hired?  
 3 A Only through this process.  
 4 Q Through which process?  
 5 A This lawsuit that's going on today. I have heard that  
 6 information.  
 7 Q Okay. And that was before the Top Concerns memo was  
 8 composed; correct?  
 9 Do you have any personal knowledge as to when that  
 10 occurred?  
 11 A I do not.  
 12 Q And do you know -- do you have any knowledge as to  
 13 whether Mr. LaPierre pushed back on that and prevented that from  
 14 happening?  
 15 A Only through this process.  
 16 Q Was Mr. LaPierre supportive of your efforts to address  
 17 these issues in the Top Concerns memo?  
 18 A He was.  
 19 Q And were those concerns ultimately addressed to your  
 20 satisfaction?  
 21 A They were.  
 22 Q And could that have happened without Mr. LaPierre's  
 23 support?  
 24 A It probably would have been more difficult, yes, but he  
 25 was helpful.

NYAG v  
NRA

February 8, 2024

Erstling - by Defendant - Cross/Mr. Farber Page 3862

1 Q But as you sit here today, you have no personal  
2 knowledge of Mr. LaPierre doing anything to try to impede that  
3 effort; correct?  
4 A No.  
5 Q And in fact, your personal knowledge is the opposite  
6 that to -- as far as you know, he was an ally in that process;  
7 correct?  
8 MR. THOMPSON: Objection. Leading.  
9 THE COURT: This is cross. Overruled.  
10 MR. CORRELL: Thank you.  
11 THE COURT: Mr. Farber.  
12 MR. CORRELL: I don't see an answer to the last  
13 question.  
14 THE COURT: The last question; And in fact your  
15 personal knowledge is the opposite that as far as you know,  
16 he was an ally in that process; correct?  
17 And then there was an objection which I overruled.  
18 So you can answer.  
19 A Yes. He's been an ally.  
20 MR. CORRELL: Thank you, your Honor.  
21 MR. FARBER: May I proceed?  
22 THE COURT: Yes.  
23 Q Good afternoon. My name is Seth Farber. I represent  
24 Mr. Phillips.  
25 Mr. Correll just asked you some questions as to whether

Erstling - by Defendant - Cross/Mr. Farber Page 3863

1 Mr. LaPierre did anything to impede the reforms that were being  
2 put into place at the NRA after you went to the Audit Committee  
3 with these concerns.  
4 Do you recall that question?  
5 A I do.  
6 Q Okay. Mr. Phillips didn't do anything to impede those  
7 reforms either; did he?  
8 A He wasn't here, so no.  
9 Q He was still a treasurer at the NRA at the time; wasn't  
10 he?  
11 A I didn't see him so -- correct. I don't think he did  
12 anything, but I wouldn't know. He wasn't here.  
13 Q You wouldn't know?  
14 A I wouldn't know.  
15 Q At the time your position at the NRA was Director of  
16 Budget and Financial Analysis; is that correct?  
17 A That's correct.  
18 Q How many people reported to you in that capacity?  
19 A Usually one to two.  
20 Q Okay. Of and you did not report directly to Mr.  
21 Phillips at that time; did you?  
22 A I did not.  
23 Q You reported to Mr. Tedrick?  
24 A Correct.  
25 Q But you were frustrated because you did not get to

Erstling - by Defendant - Cross/Mr. Farber Page 3864

1 speak to Mr. Phillips directly; is that correct?  
2 MS. EISENBERG: Mischaracterizes testimony.  
3 THE COURT: He is just asking a new question.  
4 Overruled.  
5 A I wasn't necessarily frustrated I couldn't meet with  
6 him. It's just that we didn't meet with him.  
7 Q But you didn't report directly to him. You reported to  
8 Mr. Tedrick; isn't that correct?  
9 A That's correct.  
10 Q Who is the treasurer now?  
11 A Sonya Rowling.  
12 Q Okay. And how many people roughly report to her?  
13 A Got to be close to 50.  
14 Q And what's the scope of her responsibilities as  
15 treasurer and CFO?  
16 A Financial aspects of the Association. That could range  
17 from IT work to Financial Services to treasury to risk and  
18 insurance to tax.  
19 Q Interactions with the Board?  
20 A Yes.  
21 Q Audit Committee?  
22 A Yes.  
23 Q Finance Committee?  
24 A Yes.  
25 Q Mr. LaPierre when he was EVP?

Erstling - by Defendant - Cross/Mr. Farber Page 3865

1 A Correct; yes.  
2 Q Fairly broad?  
3 A Yes.  
4 Q And is it correct -- is it a fair characterization to  
5 say that you were not a fan of Mr. Phillips' management style?  
6 A I was not a fan.  
7 Q You preferred Mr. Spray's; isn't is that right?  
8 A I do prefer Mr. Spray's.  
9 Q And I think you testified that you at some point were  
10 frustrated that you were seeing a great deal of large  
11 transactions with very little detail.  
12 Is that accurate?  
13 A Yes.  
14 Q And you were also frustrated -- you had concerns about  
15 transactions that you believe were lacking proper approvals. Is  
16 that correct as well?  
17 A I don't know if approvals was the right word, but it  
18 was lacking in detail.  
19 Q Okay.  
20 A They always had approvals.  
21 Q And you have shared that with Mr. Spray you said in  
22 2018?  
23 A We did, yes.  
24 Q Well, I'm asking about you.  
25 A I did, yes.

NYAG v  
NRA

February 8, 2024

Erstling - by Defendant - Cross/Mr. Farber Page 3866

1 Q You did; correct.

2 And if I recall correctly, you have been at the NRA

3 since about 2001; is that correct?

4 A Yes.

5 Q And so that was the first time that you shared those

6 concerns with someone at Mr. Spray's level; is that correct?

7 A I would always bring them up to Rick, but I never had a

8 meeting with Woody to talk about stuff like that.

9 When Craig came, we had meetings. We were sitting

10 around the table on a month to month basis so as these things

11 were coming in, I was able to bring them up.

12 Q Okay. So in -- from 2001 when you started to 2018, you

13 never saw Mr. Phillips in person?

14 A I saw Woody three times a year during the budget

15 process.

16 Q And you never said anything to him about those concerns

17 at that time; right?

18 A The invoices, no.

19 Q When did you first meet Mr. Frazer over here?

20 A Probably when he became general counsel.

21 Q Which was in 2015; correct?

22 A I guess, yes.

23 Q Okay. And you testified on direct examination that

24 prior to the Audit Committee meeting in 2018, you talked with

25 him about the concerns that you had; correct?

Erstling - by Defendant - Cross/Mr. Farber Page 3867

1 A Correct.

2 Q You've never had any doubts about Mr. Frazer's

3 integrity, I take it.

4 A No.

5 Q Okay. Has he ever refused to hear you out on an issue?

6 A No.

7 Q You never went to him in 2015, 2016, 2017 about these

8 concerns that you say you had; isn't that correct?

9 A That's correct.

10 Q Okay. And you could have done that; right?

11 A I could have.

12 Q You could have sent him an email even if he wasn't

13 personally available; right?

14 A Yes.

15 Q But you didn't do that.

16 A I did not.

17 Q I think you said that in 2018, you started to sort of

18 sit around the table with the group of other people in the

19 Finance Department that you described and sort of put things

20 together, engaged, and I think you used the word "group think."

21 Is that correct, sir?

22 A Yes, sir.

23 Q Okay. So when you engaged in that group think with

24 your colleagues, what was your salary at the time?

25 A I think 180,000.

Erstling - by Defendant - Cross/Mr. Farber Page 3868

1 Q Okay. What's your salary now, sir?

2 A 250,000.

3 Q And you have a higher position now; don't you?

4 A I do and more responsibility.

5 Q And Mr. Tedrick's job. Mr. Tedrick's job. You now

6 have the job that he used to have?

7 A No, sir, I do not. Mr. Tedrick is still there, and Mr.

8 Tedrick still does his job.

9 Q Are you above Mr. Tedrick?

10 A No.

11 Q You just have a higher salary?

12 A I have Sonya Rowling's old job.

13 Q I am mistaken. I apologize.

14 So you have Sonya Rowling's old job. And do you know

15 what her salary was at the time when you were all sitting around

16 talking?

17 A I do not at the moment, no.

18 Q And by the way, you said that Mr. Phillips had not

19 held -- that there were never any formal regularly scheduled

20 meetings prior to Mr. Spray being there; is that correct?

21 A That's correct.

22 Q But you did testify you would have ad hoc random

23 meetings; isn't that right?

24 A As it relates to the budget, yes.

25 Q There was nothing preventing you from talking to your

Erstling - by Defendant - Cross/Mr. Farber Page 3869

1 colleagues about these concerns that you had during that period?

2 A We did talk from time to time, but it was --

3 Q Nothing prevented you from doing this.

4 A Nothing prevented us from doing it.

5 Q Or take the concerns that emerged from those

6 discussions and going to Mr. Frazer as the general counsel of

7 the NRA and reporting to him that there was something that

8 bothered you; isn't that right?

9 A That's correct.

10 Q Okay. So now you're still employed by the NRA today?

11 A Yes, I am.

12 Q Making your higher salary?

13 A That's correct.

14 Q Okay. Now, you were deposed in this case; isn't that

15 right?

16 A I was.

17 Q Okay. And you understand that Ms. Eisenberg who

18 questioned you earlier represents the NRA; right?

19 A That's correct.

20 Q Your employer.

21 A Correct.

22 A Yes.

23 Q She represented you at that deposition too; isn't that

24 what right?

25 A I believe so.

NYAG v  
NRA

February 8, 2024

Erstling - by Defendant - Cross/Mr. Farber Page 3870

1 Q Okay. And you testified earlier in this trial. It  
 2 seems like a while ago. Several weeks ago.  
 3 Do you recall that, sir?  
 4 A I do.  
 5 Q Okay. And between your testimony then and today, have  
 6 you talked with Ms. Eisenberg at all?  
 7 A I have.  
 8 Q And any other members of her firm?  
 9 A Yes.  
 10 Q You talked to them about what you're going to testify  
 11 about?  
 12 A Whatever documents, yes.  
 13 Q Well, you just went over documents? Is that all that  
 14 happened?  
 15 A That's what happened.  
 16 Q Did you talk about the subject that you were going to  
 17 testify about?  
 18 A We talked about the documents which is the subject of  
 19 the testimony that I'm doing today.  
 20 Q Did she ask you any questions?  
 21 A Yes.  
 22 Q Okay. And you answered and went over what you were  
 23 going to testify about today; isn't that right?  
 24 A Yes.  
 25 Q About how many times did you do that?

Erstling - by Defendant - Cross/Mr. Farber Page 3871

1 A Two.  
 2 Q Okay. And did you have any meetings like that before  
 3 you testified the first time?  
 4 A Yes.  
 5 Q Okay. With Ms. Eisenberg or with others from the  
 6 Brewer Firm?  
 7 A Others from the firm.  
 8 Q Which ones?  
 9 A Susan Dillon.  
 10 Q And what's Susan Dillon's role at the Brewer Firm?  
 11 A You have to ask the Brewer Firm. I don't know exactly  
 12 what her role is.  
 13 Q Well, I'm asking if you know.  
 14 A I don't know.  
 15 Q Okay. Did you have any meeting with Mr. Brewer  
 16 himself?  
 17 A Yes.  
 18 Q Okay. And when were those?  
 19 A I had a meeting yesterday.  
 20 Q Oh, okay.  
 21 With Ms. Eisenberg?  
 22 A She was in the room, yes.  
 23 Q Okay. And to talk about the documents?  
 24 A Yes.  
 25 Q That you testified about today.

Erstling - by Defendant - Redirect/Ms. Eisenberg Page 3872

1 A Yes.  
 2 MR. FARBER: Okay. Nothing further your Honor.  
 3 THE COURT: Redirect.  
 4 REDIRECT EXAMINATION  
 5 BY MS. EISENBERG:  
 6 Q Mr. Erstling, when you and I met to prepare for your  
 7 testimony today, I didn't tell you what answers to give. Is  
 8 that fair?  
 9 A That's fair.  
 10 Q I didn't script out your answers for you; right?  
 11 A No, ma'am, you did not.  
 12 Q And neither did Ms. Dillon?  
 13 A No, she did not.  
 14 Q Nor Mr. Brewer right?  
 15 A Correct.  
 16 Q All the answers that you gave today are your answers;  
 17 fair?  
 18 A They are my answers.  
 19 Q You mentioned the word "group think" in your testimony  
 20 when I asked questions and then Mr. Farber brought it up again.  
 21 That tends to have different connotations.  
 22 Can you please explain to the members of the jury in  
 23 what sense you meant it here.  
 24 A I go to back to the puzzle. It's putting the pieces of  
 25 the puzzle together. Nobody had all of the pieces of the puzzle

Erstling - by Defendant - Redirect/Ms. Eisenberg Page 3873

1 and so by sitting around, everybody was putting their piece into  
 2 this puzzle and you could start to see the picture that was  
 3 taking place.  
 4 It wasn't a, hey, let's all group together and pick one  
 5 route. That wasn't the purpose. It was just to get a clear  
 6 picture of what was going on.  
 7 Q And did the meetings that Mr. Spray organized serve as  
 8 a catalyst for being able to put those pieces of the puzzle  
 9 together?  
 10 A I would say yes, definitely.  
 11 Q Mr. Farber asked you about your promotion.  
 12 Congratulations.  
 13 A Thank you.  
 14 Q Please tell us if you don't mind how your  
 15 responsibilities have increased in connection with that  
 16 promotion?  
 17 A So prior to the promotion, I was responsible for the  
 18 budget and the annual budget and financial forecasting.  
 19 I am now responsible for all of accounting operations  
 20 which includes accounts payable, accounts receivable, general  
 21 ledger. I am also responsible for tax filings. So all of the  
 22 state, sales and use tax filings, all U.S. census bureau filings  
 23 and 990 preparation.  
 24 Q And by state filings, are you referring to filings in  
 25 pretty much every state in the United States?

NYAG v  
NRA

February 8, 2024

Erstling - by Defendant - Redirect/Ms. Eisenberg Page 3874

1 A All 50 states and some states have counties so you have  
2 to do those as well.  
3 Q Mr. Thompson asked you about the timing of the PN3  
4 software and you testified that that came in place in 2021.  
5 Do you recall that testimony?  
6 A I do.  
7 Q Is there anything wrong within the NRA continuing to  
8 improve its processes?  
9 A No. It should always improve its processes.  
10 Q I asked you about what changed after the July 30, 2018  
11 presentation, and you gave a fairly long answer.  
12 If you recall, some of the items that you specified  
13 what was the timing of the other items there. So for example,  
14 you mentioned information and education, and you mentioned the  
15 seminars.  
16 A So the compliance seminars started in the Summer of  
17 2018 and have been every year, sometimes twice a year since that  
18 time. The updating of the policies happened during that time.  
19 It may have taken more time than, you know, 2018. I can't  
20 remember exactly when the travel and expense reimbursement  
21 policy was finally updated, but it wasn't -- I don't think it  
22 was in 2018. I think it was a little bit further out.  
23 Q What about the budgeting issue that you described in  
24 connection with the NRA's own budget versus Ackerman's? Did  
25 that stop being a problem at some point?

Page 3876

1 My dad originally grew up in the Bronx, but he married  
2 my mother from San Francisco, and when they came east to live,  
3 she didn't like the cold so we ended up moving back to  
4 California and that's where I was raised.  
5 My dad growing up in New York, mom and dad came from  
6 Odessa, Russia, so it's kind of weird to be back here and seeing  
7 a lot of places that I remember visiting as a child.  
8 I went to school in the Bay area, grade school, high  
9 school, had an unremarkable but happy childhood and ended up  
10 going for my college to Stanford University, graduated with a  
11 degree in Economics.  
12 (Continued on the following page.)  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Froman - by Defendant - Direct/Ms. Rogers Page 3875

1 A We no longer do business with Ackerman McQueen, so it's  
2 not a problem.  
3 Q Fair to say that that happened in 2019?  
4 A Yes.  
5 MS. EISENBERG: Thank you very much. No further  
6 questions.  
7 THE COURT: Anything further from the Defense or  
8 from the Government?  
9 MR. THOMPSON: Nothing further, your Honor.  
10 THE COURT: Thank you, sir. You're free to step  
11 down.  
12 MS. ROGERS: The NRA calls Sandra Froman.  
13 S A N D R A F R O M A N, a witness called on  
14 behalf of the Defendant, after having been first duly sworn,  
15 took the witness stand and testified as follows:  
16 THE CLERK: State your name.  
17 THE WITNESS: Sandra Froman, F-R-O-M-A-N.  
18 THE CLERK: Thank you. You may be seated.  
19 DIRECT EXAMINATION  
20 BY MS. ROGERS:  
21 Q Good afternoon, Ms. Froman.  
22 Can you tell the jury a little bit about your personal  
23 background.  
24 A My name is Sandy Froman. I was born an raised in the  
25 San Francisco Bay area.

Stroman - by Defendant - Direct/Ms. Rogers Page 3877

1 Q At Stanford, did you become involved in any student  
2 activism or causes?  
3 A I went to -- went as a volunteer to the Stanford radio  
4 station, KZSU; and one of my assignments was to cover the  
5 Oakland draft riots in the late sixties. And I went there with  
6 a tape recorder trying to interview the police, trying to  
7 interview the students. Ended up getting beat up and ended up  
8 in the infirmary at Stanford because it was a mess. It was a  
9 free for all. That was the end of my radio career.  
10 Q After that, you decided to pick another adversarial  
11 career and you went to law school; right?  
12 A That's correct.  
13 Q Tell the jury about that?  
14 A When I graduated from Stanford, I applied to a number  
15 of law schools. I got into Harvard, and the Dean of the  
16 Stanford Law School advised me that I should go somewhere  
17 different than Stanford, I should have a different kind of  
18 experience.  
19 So, I went back east to Harvard Law School, graduated  
20 from law school. That was a great experience. It was very  
21 different for me having grown up in California. Boston was a  
22 great city, and I really enjoyed spending time there and kind of  
23 being on my own.  
24 Q Did you get involved in any activism at Harvard or had  
25 you learned your lesson?

NYAG v  
NRA

February 8, 2024

Stroman - by Defendant - Direct/Ms. Rogers Page 3878

Stroman - by Defendant - Direct/Ms. Rogers Page 3880

1 A I hadn't learned my lesson. There were very few women  
 2 in my law school class. There were less than ten percent women,  
 3 and then there were no women bathrooms in Langdell Hall --  
 4 L-A-N-G-D-E-L-L. Sorry, my sister is a reporter.  
 5 So I, along with some other women, went to the law  
 6 school and said you have to change some of the mens rooms into  
 7 ladies rooms because we were having to run, like, ten minutes  
 8 all the way back to the dorms in between class to use the  
 9 restroom. And that was I guess my most important activist  
 10 experience while at law school.  
 11 And I don't know if this is being an activist or not,  
 12 we didn't eat very well at law school. The food in the dorms  
 13 wasn't very good. So a woman named Julia Child, the famous  
 14 French chef was on WGBH TV in Boston at the time, which was the  
 15 educational station and I wrote a letter asking her to come to  
 16 the law school and give a cooking demonstration.  
 17 And to my surprise, she did. She said yes, and she  
 18 came and I didn't expect there to be great attendance because  
 19 there were so few women in school. In fact, it was a sold out  
 20 crowd. We had mostly men coming to watch her cook and give her  
 21 demonstration. That's the end of my activist career.  
 22 Q So, you were successful at your activism to teach the  
 23 lawyers to cook for themselves.  
 24 A That's right.  
 25 Q What about the ladies bathrooms, did succeed at getting

1 Q And how did your career at Loeb & Loeb progress?  
 2 A I did very well. I was made a partner in the shortest  
 3 amount of time and was, in fact, the first woman partner in the  
 4 50-year history of that firm.  
 5 Q Did they have a bathroom for you or did you have --  
 6 A Funny you ask, we had women's rooms on the even  
 7 numbered floors of the high rise and men's rooms on the odd  
 8 numbered floors.  
 9 Q A little better than Harvard.  
 10 A Definitely.  
 11 Q And after you made partner at Loeb & Loeb, did you  
 12 change careers at all?  
 13 A I took a leave of absence from Loeb & Loeb. I had  
 14 tried five cases in four months and was pretty tired, and I had  
 15 an offer to teach law school at the University of Santa Clara,  
 16 which is also in the Bay area, Silicone Valley. So I wanted to  
 17 do something different, so I accepted that offer and I went and  
 18 I taught as a visiting assistant professor of law for two years  
 19 at Santa Clara.  
 20 Q What law classes did you teach?  
 21 A I taught evidence. I taught criminal law. I taught  
 22 the civil side of the law clinic, which was about forty-five law  
 23 students who were actually practicing in the state court in  
 24 California representing clients, and I was, like, the advisor.  
 25 I used to joke it was like having forty-five lawyers

Stroman - by Defendant - Direct/Ms. Rogers Page 3879

Stroman - by Defendant - Direct/Ms. Rogers Page 3881

1 Harvard law school to create a bathroom for women?  
 2 A Yes.  
 3 Q And after you graduated law school, you went to a law  
 4 firm; is that right?  
 5 A That's correct.  
 6 Q And what firm?  
 7 A I went to a firm called Loeb & Loeb in Los Angeles. It  
 8 was at that time the third largest law firm in LA. My goal when  
 9 I left law school was to go to a major firm and do big time  
 10 litigation.  
 11 Q What kind of work did you end up doing at Loeb & Loeb?  
 12 A Pretty much everything, everything in commercial  
 13 litigation. I did securities work. I did banking litigation.  
 14 I did real estate litigation, bankruptcy litigation. We advised  
 15 corporate clients in different business areas. I took whatever  
 16 came to me.  
 17 I was really enthusiastic learning about every area of  
 18 the law I could.  
 19 Q Did you work on any major bankruptcies?  
 20 A I did. I was one of the lawyers who worked on -- baby  
 21 lawyer is what I used to call myself because I had a lot of  
 22 people older and more experienced than me to learn from. But we  
 23 worked on what was then the Equity Funding Corporation of  
 24 America bankruptcy which at the time was the largest bankruptcy  
 25 in the country.

1 under your supervision trying to commit malpractice on a daily  
 2 basis and my job was to keep them out of trouble.  
 3 THE COURT: A little pressure on me getting my  
 4 evidence rulings right.  
 5 Q Ms. Stroman, how long have you been a member of the  
 6 NRA?  
 7 A Since the early eighties. I would say '82 or '83.  
 8 Q And how long have you been on the board of directors at  
 9 the NRA?  
 10 A Since 1992.  
 11 Q Why did you become a gun owner?  
 12 A Practicing law in Los Angeles, living alone in my  
 13 house, I was going through a separation and divorce at the time;  
 14 and in the middle of the night someone tried to break into my  
 15 house, woke me up. I was very frightened. I pounded on the  
 16 inside of the door. I could see through the peephole that there  
 17 was somebody there and he would not go away.  
 18 So, I finally called the police and they came and took  
 19 them fifteen minutes; and it was one of those things that  
 20 changes your life because I realized that I had to take  
 21 responsibility for my own safety and I went the next day to a  
 22 gun store and tried to buy a gun, and that's how I got involved  
 23 in the shooting sports.  
 24 Q Let's look at Tab 2 of your binder.  
 25 MS. ROGERS: These are the NRA's ByLaws, DX1-0754.

NYAG v  
NRA

February 8, 2024

Stroman - by Defendant - Direct/Ms. Rogers Page 3882

1 There are other versions of the Bylaws that are in evidence.  
 2 I would like to admit this one. Is there any  
 3 objection.  
 4 MR. WANG: No objection.  
 5 THE COURT: Admitted.  
 6 (Whereupon, at this time Exhibit DX1-0754 was  
 7 admitted and received into evidence.)  
 8 Q Look at page 13 of the Bylaws, and I'm referring to the  
 9 numbered page of the pamphlet, not the evidence -- yeah, the  
 10 numbered page of the pamphlet, not the exhibit page.  
 11 A I have it in front of me.  
 12 Q All right. And we see the Powers and Duties of the  
 13 board of directors to formulate the policies and governing  
 14 association and exercise general oversight of the affairs and  
 15 property.  
 16 Do you see that?  
 17 A Yes.  
 18 Q Would you -- does that conform with your understanding  
 19 of your role and your job on the board?  
 20 A Absolutely.  
 21 Q Have you served on other board of directors?  
 22 A I have.  
 23 Q For profit and nonprofit?  
 24 A Yes.  
 25 Q Let's look now at page 1 of the same Bylaws, and it is

Stroman - by Defendant - Direct/Ms. Rogers Page 3884

1 THE COURT: Overruled. She's a board member. She  
 2 can give her take on what she thinks her responsibilities  
 3 are.  
 4 A My understanding as a board member of the NRA is that I  
 5 have a fiduciary duty to act in the best of the association, not  
 6 in my own best interest, not in the best interest of a third  
 7 party.  
 8 That I have an obligation to inform myself of the  
 9 matters that are put before the board for us to decide and  
 10 discuss. That I can't take advantage of that position for my  
 11 own personal benefit, and I've tried very hard throughout my  
 12 time on the board to adhere to those obligations and  
 13 responsibilities and to that duty.  
 14 Q Procedurally, how does the board make decisions?  
 15 A Well, the board is a very large board. We have 76  
 16 board members. And like a state legislature or even like  
 17 Congress, we do most of our work through committees. We have  
 18 over 30 committees, several more boards and trusts that are  
 19 affiliated with the NRA. And so we ask the committees to dig  
 20 deep into the subject matter of what they're being asked to look  
 21 at. It might be a rule change in an NRA competition. It might  
 22 be an outreach program that we have. It might be a training  
 23 program that we have. Let's say to train women in marksmanship  
 24 and the safe handling of firearms, whatever that subject matter  
 25 is we ask the committee whose responsibility is in that subject

Stroman - by Defendant - Direct/Ms. Rogers Page 3883

1 page 1 of the pamphlet.  
 2 Those are the Purposes and Objectives of the NRA.  
 3 Ms. Froman, in your capacity as a member of the NRA  
 4 board, do you feel you have a duty to advance these purposes and  
 5 these objectives?  
 6 A Yes.  
 7 Q And do you feel the NRA does that?  
 8 A Yes, absolutely.  
 9 Q Can any one member of the board speak for the NRA?  
 10 A No.  
 11 Q You all have the right to free speech; right?  
 12 A Everyone on the board as an individual has a right to  
 13 free speech, but the NRA operates as a collective body. We make  
 14 decisions as a group. We debate issues before we make a  
 15 decision, before we vote on it; and then once we voted and we've  
 16 established a policy, every board member has a fiduciary duty to  
 17 carry out that policy and to abide by that policy that has been  
 18 reached through board discussion and deliberation.  
 19 Q I heard you use the word "fiduciary duty." You and I  
 20 are lawyers, but not everyone on the jury -- actually, I think  
 21 nobody on the jury is.  
 22 Can you explain in lay terms how you understand your  
 23 responsibilities as a board member?  
 24 A It is a responsibility --  
 25 MR. WANG: Object to providing a legal opinion.

Stroman - by Defendant - Direct/Ms. Rogers Page 3885

1 matter to take a look at it and dig deep, debate the issues  
 2 within the committee and then bring any action items that they  
 3 might have, any motions that they might have to the entire board  
 4 of directors.  
 5 The committee chairman would stand up at the board  
 6 meeting, give a report. Make a motion for any action item, and  
 7 then the board would have an opportunity to debate that and,  
 8 ultimately, vote on whether to accept the recommendation of the  
 9 committee and put it into action.  
 10 Q You mentioned debate. Can you describe for the jury  
 11 the tenor and robustness of the debates that happen on the NRA  
 12 board?  
 13 A Some things are pretty much everybody agrees to. We  
 14 have rule committees that make up the rules and amend the rules  
 15 for different competitions, and those are people who are experts  
 16 in those competitions and I'm not.  
 17 So, if that committee makes a recommendation to me,  
 18 unless on its face it looks like something's wrong, I would  
 19 certainly object to it.  
 20 However, most of the other committees deal with issues  
 21 that many of us as board members are familiar with and  
 22 there's many, many different points of views. The NRA board is  
 23 lucky to have people from different walks of life, from  
 24 different socioeconomic statuses, people with different  
 25 experience in their lives who come together; and we all share a

Stroman - by Defendant - Direct/Ms. Rogers Page 3886

1 common purpose, which is to support the NRA and to support its  
 2 missions and objectives.  
 3 But when it comes to whether or not we should engage in  
 4 a particular activity, we sometimes have debates and we talk  
 5 about them at the board meetings. Very often those debates are  
 6 contentious I would say even. I think we strive to be  
 7 respectful. We like one another. We're all part of the same  
 8 family in the sense that we agree with the missions and goals of  
 9 the NRA. Otherwise, we wouldn't be on the board; but when it  
 10 comes to how to best carry out those missions and goals we  
 11 sometimes disagree, so we talk it out. And people who have  
 12 opposing views get a chance to express those and have those  
 13 views challenged.  
 14 Q You've been on the board for decades so both before and  
 15 after the rise of social media; right?  
 16 A Decades, yes.  
 17 Q How has -- how, if at all, has social media affected  
 18 the way that this vigorous contentious debate happens?  
 19 A When I first joined the NRA board, things were handled  
 20 and discussed mostly inside the board, at board meetings.  
 21 Sometimes during the social hour at dinnertime we would be  
 22 talking still in the restaurant about issues that had come up.  
 23 But now there's such a plethora of ways for people to  
 24 talk about these issues, to get information on the issues that  
 25 we discussed. Social media has changed the way we do business

Stroman - by Defendant - Direct/Ms. Rogers Page 3887

1 because people want to debate this in social media as opposed to  
 2 win the confines of a board meeting.  
 3 Q Is there a set of rules that the board issues to  
 4 officers to direct the management of the NRA?  
 5 A Yes. We have -- we have elected volunteer officers and  
 6 we have elected paid officers, and they have different  
 7 responsibilities.  
 8 As a board member, my boss, if you will, is the  
 9 president of the association, and the president of the  
 10 association and the vice presidents and the board together then  
 11 direct the activities, if you will. We have oversight  
 12 responsibility over the activities of the paid elected officers,  
 13 including the executive vice president.  
 14 Q Is there a policy manual comprising the board's  
 15 director policies?  
 16 A Yes, a very thick policy manual. It was -- I don't  
 17 know exactly when it was started, but I know when I first came  
 18 on the board in 1992 it contained all of the accumulated  
 19 policies having been passed by the NRA directors, which one had  
 20 been amended, which one had been superseded by new policies.  
 21 It was sort of like a history of the policies, motions,  
 22 resolutions that the NRA had passed as a collective body; and  
 23 those were available in the office of the secretary and you  
 24 could look at those anytime you wanted. Quite often, I would  
 25 either go up to the secretary's office and look at the policy

Stroman - by Defendant - Direct/Ms. Rogers Page 3888

1 book or I would ask someone in the secretary's office to tell me  
 2 if we had a particular policy on a matter we were being asked to  
 3 discuss at a board meeting.  
 4 Q As a director, do you expect the NRA executives and  
 5 staff to comply with the rules that the board sets?  
 6 A Absolutely.  
 7 Q And as a director, do you have a sense of whether those  
 8 rules are freely available to be consulted by staff and  
 9 executives?  
 10 A They are freely available. And, in fact, a number of  
 11 these policies have also been made available to employees at all  
 12 levels. We now have an NRA internal intranet so employees can  
 13 look up things that might affect their job, their position and  
 14 rely on those policies.  
 15 Q Is there training not just for employees, but for board  
 16 members on compliance and policy?  
 17 A Yes.  
 18 Q Can you describe what that's like?  
 19 A We have -- training is given at least once a year on  
 20 compliance to board members that I know about. It's been more  
 21 often when changes are made and how in our compliance policies  
 22 board members will be advised of those changes in, let's say,  
 23 the form that we have to report.  
 24 Employees are also given training. We, as a board, are  
 25 advised that employees received training, and we can ask

Stroman - by Defendant - Direct/Ms. Rogers Page 3889

1 questions about that or what the training included.  
 2 So, it's done on an at least annual basis and sometimes  
 3 more than once. I know -- I can't remember what year it was,  
 4 but maybe 2022, 2023. There were two compliance trainings for  
 5 board members. I missed one of them. I was absent for illness  
 6 during that meeting and attended the other one.  
 7 Q Let's turn to page 1 of your binder.  
 8 MS. ROGERS: This is DX1-0521. Do you have any  
 9 objection to this document? I think I received none. This  
 10 is the NRA directory.  
 11 MR. WANG: No objection.  
 12 MS. ROGERS: I move to admit it.  
 13 THE COURT: Anyone? All right, it is admitted.  
 14 (Whereupon, at this time Exhibit DX1-0521 was  
 15 admitted and received into evidence.)  
 16 Q Ms. Froman, do you recognize this document?  
 17 A Yes. It is the NRA official directory from September  
 18 of 2022.  
 19 Q I'd like you to turn to the page that's marked 19 in  
 20 the pamphlet. It is going to be exhibit page 20.  
 21 Do you recognize the list of committees?  
 22 A Yes.  
 23 Q Can you describe -- and I know you touched on it a  
 24 little bit, but describe to the jury the role that committees  
 25 play with the governing of the NRA?

Stroman - by Defendant - Direct/Ms. Rogers Page 3890

1 A As I mentioned, the committees are made up of people  
 2 who have subject matter of expertise in the different areas.  
 3 The Black Powder Committee which is committee number  
 4 four --  
 5 Q Let's try to talk slower for the court reporter.  
 6 A I will. Thank you. The people who are appointed to  
 7 that committee are people who are black powder competitors who  
 8 are familiar with the rigor of black powder competitions.  
 9 Sports shooting have a lot of different ways that people  
 10 participate. You can be a shotgun shooter. You can be a pistol  
 11 shooter. You can be a long-range rifle shooter shooting at  
 12 targets like a thousand yards away. This is a precision sport,  
 13 much like archery, for example.  
 14 So, the people who are appointed to each of these  
 15 committees are people who can add value to the discussion of  
 16 those topics for NRA.  
 17 I've been on a number of these committees over the  
 18 years. Some shooting committees, some legislative committees.  
 19 I'm currently chair of the Legal Affairs Committee, for example.  
 20 So, I've served on a lot of these different committees  
 21 over the years and I'm familiar with what most of them do.  
 22 Q Let's talk about the Grassroots Development Committee.  
 23 Have you served on that committee?  
 24 A I served on that committee for a very long time, and I  
 25 am currently chair of that committee. The purpose of that

Stroman - by Defendant - Direct/Ms. Rogers Page 3891

1 committee is to deliver information about NRA's programs and  
 2 activities to the Grassroots. That is to our members in every  
 3 state, all across the country to let them know what's available  
 4 to them, what classes, activities, training are available to  
 5 them as NRA members and beyond.  
 6 We don't restrict our courses, our marksmanship courses  
 7 or our gun safety courses or our hunting safety courses to just  
 8 members. It is anyone who wants to take them. We encourage  
 9 people, of course, to become members, but they're available to  
 10 everyone.  
 11 Q What about the Legislative Policy Committee, were you  
 12 on that committee?  
 13 A Yes. I've been on the Legislative Policy Committee for  
 14 a number of years, and that deals with the legislative affairs  
 15 of the NRA. Probably what most people think about when they  
 16 hear NRA if they're not members, is they think about the  
 17 political part of the NRA, but it's -- the political part is  
 18 what we're known for. I think it's what we make the papers for,  
 19 but it's in many ways a relatively small part of what the  
 20 association does.  
 21 Our bigger general operations department and all of the  
 22 programs we have really account for the majority of employees at  
 23 NRA and for the majority of our budget.  
 24 Legislative Policy Committee deals with the political  
 25 and legislative aspects of the NRA.

Stroman - by Defendant - Direct/Ms. Rogers Page 3892

1 Q Have you served on the Nominating Committee?  
 2 A Yes.  
 3 Q And we'll talk in more detail later about the mechanics  
 4 of NRA elections, but can you tell the jury what the Nominating  
 5 Committee is?  
 6 A Every year a nominating committee is elected by the NRA  
 7 board of directors as a whole, and the job of the Nominating  
 8 Committee is to consider applicants for nomination as possible  
 9 directors, for their names to be included on the ballot that is  
 10 sent out every year to NRA voting members to vote on members of  
 11 the board of directors. The Nominating Committee also nominates  
 12 officers for the next term.  
 13 I've served on the Nominating Committee maybe three or  
 14 four times in my thirty years on the NRA board, and I chaired a  
 15 nominating committee about three years ago.  
 16 Q What's the Committee on Hearings?  
 17 A The Committee on Hearings hears complaints, often  
 18 ethical complaints about members, members who are not -- who do  
 19 things that are contrary to the NRA's purposes and objectives.  
 20 When a complaint is made, it usually comes in from  
 21 outside the NRA board, a complaint about a member doing  
 22 something that's contrary to the interest of the NRA. It has a  
 23 process that is followed and the Committee on Hearings is often  
 24 asked to deliberate and make a decision on whether that person  
 25 who is complained about -- the defendant if you will -- retains

Stroman - by Defendant - Direct/Ms. Rogers Page 3893

1 their NRA membership.  
 2 Q Is that process different for different complaints or  
 3 is every NRA member entitled to file a complaint and have it  
 4 subjected to the same process?  
 5 A Every NRA member is entitled to file a complaint and  
 6 have it subjected to the same process.  
 7 Q And when a fellow NRA member is the target of an ethics  
 8 complaint, can you describe the due process that person  
 9 receives?  
 10 A I can't describe it in detail. It is prescribed in our  
 11 Bylaws, and I think due process is a big part of that because we  
 12 want to make sure that everybody has a fair opportunity to tell  
 13 their side of the story. There's an appeals process as well.  
 14 I served on that Hearings committee a very long time ago;  
 15 and I remember it was a -- it was a confidential matter. I  
 16 don't remember the name of the person anyway, but it was a  
 17 matter of them speaking out and saying untrue things about the  
 18 NRA; and the committee heard it, that person had an opportunity  
 19 to have their side of the story told. They wrote many letters.  
 20 They were considered by the Hearings committee and a decision  
 21 was ultimately reached.  
 22 Q What about the Public Affairs Committee, have you been  
 23 on that one?  
 24 A Yes, recently only. I have not served -- I did not  
 25 serve on the Public Affairs Committee for a long time; but in

NYAG v  
NRA

February 8, 2024

Stroman - by Defendant - Direct/Ms. Rogers Page 3894

1 the last three years, I've been a member of the Public Affairs  
 2 Committee. The job of that committee is to represent to the  
 3 outside world what the NRA is, what programs we provide, the  
 4 positions that we take, why the association exists.  
 5 Q You're chair of the Legal Affairs Committee; right?  
 6 A Yes.  
 7 Q What does that committee do?  
 8 A The Legal Affairs Committee has oversight  
 9 responsibility overall of the legal affairs of the association  
 10 unless they have been sent to another body or deliberative body  
 11 that is responsible for handling a particular legal affair.  
 12 But we meet three times a year at least, sometimes more  
 13 often and we will hear reports from our General Counsel. We  
 14 will hear reports from outside counsel. This is all done in  
 15 executive session and subject to the attorney-client privilege;  
 16 and if we have questions, we have an opportunity as a committee  
 17 to ask those questions, to get answers to those questions and  
 18 make sure that we feel as members of that committee that the  
 19 legal affairs of the NRA are being properly handled.  
 20 Q What about the Committee on Elections?  
 21 A The Committee on Elections oversees the handling of NRA  
 22 elections; and by that, I mean when the 76 board members who  
 23 serve on the NRA board are elected and take office. We have a  
 24 very large board. When you're elected, you serve for a  
 25 three-year term usually, and the elections including the

Stroman - by Defendant - Direct/Ms. Rogers Page 3895

1 counting of the ballots by a certified public accounting firm,  
 2 that's the jurisdiction of the Committee on Elections.  
 3 We want to make sure those are full and \*\*\* fair  
 4 elections. The members vote by mail, so the ballots are  
 5 collected by mail, counted. They're kept in a safe. It's the  
 6 job of the Committee on Elections to supervise the election  
 7 process and make sure that security measures are in place to  
 8 make sure the election is fair.  
 9 Q You served on the Committee on Elections?  
 10 A Yes.  
 11 Q And what years did you serve on that committee?  
 12 A I don't remember.  
 13 Q More than one?  
 14 A I think I only served on that committee once.  
 15 Q Well, in your years of service on the board and  
 16 including when you were on the Elections Committee, did you ever  
 17 observe anything you would characterize as election rigging?  
 18 A No.  
 19 Q You mentioned that security procedures are used for  
 20 elections; right?  
 21 A Yes.  
 22 Q And an accounting firm is involved; right?  
 23 A Yes.  
 24 Q Can you explain a little more about what that is and  
 25 what that means and why the NRA does that?

Stroman - by Defendant - Direct/Ms. Rogers Page 3896

1 A Well, the ballots, we vote by mail. That's in  
 2 accordance with our Bylaws; and in order to be a voting member,  
 3 you need to be a member of the NRA for five continuous years or  
 4 more or to be a live member or above. And you get a ballot in  
 5 your magazine. They usually come around February. The election  
 6 results are usually available a week or two before our annual  
 7 meeting, which is in the spring, April or May, let's say.  
 8 So, when the ballots start to come in, they are  
 9 collected by the accounting firm. They are stored safely. They  
 10 are counted by that firm. I do remember a little bit of issues  
 11 about how quickly the accounting firm was actually counting the  
 12 ballots. We had to announce the results in our upcoming  
 13 meeting, and we needed to know what the count was.  
 14 So, the accounting firm then certifies the results of  
 15 that election, and the NRA secretary announces the results of  
 16 that election at the annual meeting of members, which is akin to  
 17 a corporate shareholders meeting.  
 18 Q Now, there's a 76th director that's elected at the  
 19 meeting; right?  
 20 A Yes.  
 21 Q Can you describe that process?  
 22 A The 76th director is elected at the annual meeting.  
 23 The annual meeting moves around to different jurisdictions.  
 24 we might meet one year in Dallas. We might meet one year in  
 25 Indianapolis. We had a meeting in Tucson, Arizona, where I

Stroman - by Defendant - Direct/Ms. Rogers Page 3897

1 live. We had a meeting in Charlotte.  
 2 Any NRA member who's present at the annual meeting,  
 3 they don't have to be five-year continuous member or better.  
 4 They can be any NRA member is entitled to vote for the 76th  
 5 director, and that person is elected to serve for one year until  
 6 the next annual meeting when we elect a 76th director again.  
 7 The important thing about that is the people who are  
 8 eligible to run for 76th director are those people who ran for  
 9 the board in the last election, but didn't make the cut off.  
 10 They didn't get elected to a spot, so they are the four or five  
 11 or sometimes eight or ten people who did the work to apply for  
 12 and run for the NRA board of directors, didn't get elected. Now  
 13 they can -- they're names are on the ballot for the 76th. They  
 14 don't have to do anything else. They're already on the ballot.  
 15 Q We heard testimony about board meetings where there's  
 16 about 76 people in the room, but the 76th director is elected by  
 17 members at the members meeting; correct?  
 18 A Correct.  
 19 Q Can you compare for the jury the size and scope of the  
 20 members meeting and who attends that versus the board meeting?  
 21 A Well, the board meeting we have 76 members of the  
 22 board, but any NRA member can attend the board meeting and the  
 23 committee meetings of the board except for executive sessions.  
 24 So, I, being an enthusiast for NRA, I've always invited  
 25 NRA members come to the meetings, see what goes on. Remember,

Page 3898

1 come to the committee meetings, come to the board meetings and  
 2 I've encouraged many NRA members who have been to those meetings  
 3 with me to run for the board of directors and many have gotten  
 4 on the board that way.  
 5 So, a board meeting is relatively small, especially the  
 6 meetings that we have that aren't -- we have three meetings a  
 7 year: One is in the winter, usually in January. One is at the  
 8 annual meeting, which is in the spring or early summer, and one  
 9 is in the fall, usually September.  
 10 The January and September meetings are held at a hotel  
 11 in usually in either DC or we've had them in Dallas, Texas; but  
 12 the main meeting, the annual meeting of members is always in the  
 13 spring or early summer and those meetings are very large because  
 14 we always have what we call the NRA annual meeting.  
 15 It is like a convention. We have different seminars  
 16 for our members to attend. We invite them to come. There's  
 17 usually a show with exhibitors. We have training that actually  
 18 occurs at that annual meeting. We have a lot of entertainment,  
 19 a lot of country western singers come and perform at that  
 20 meeting. There are lots of speakers. There are celebratory  
 21 events. There are fundraising events for NRA's programs. So we  
 22 might have, you know, 20 to 40 or 50,000 people at those  
 23 conventions, depending on what time of year it is and where  
 24 they're held.  
 25 (Continued on next page)

Froman - by Defendant - Direct/Ms. Rogers Page 3899

1 Q And all of those people, if they are an NRA member can  
 2 vote for the 76th Director?  
 3 A Correct.  
 4 Q Who chooses who is on each Board committee?  
 5 A Under our Bylaws, the president chooses the committee  
 6 members and chooses the Chair and the Vice-Chair of these  
 7 committees.  
 8 Q You have been president of the NRA; right?  
 9 A Yes.  
 10 Q As president, did that process for committee assignment  
 11 make sense to you?  
 12 A Yes. I had worked with -- when I became president in  
 13 2005, I had worked with a number of people already on the Board  
 14 who had been on the Board for a long time. I knew them. I knew  
 15 the work they were capable of. I knew what their talents were,  
 16 and I wanted to make sure that the committees were staffed to  
 17 the best of my ability.  
 18 I wanted people in charge who would help me pick the  
 19 right members for that committee so the committee could  
 20 discharge their responsibilities to the Board and to our  
 21 members.  
 22 Q Have you ever wanted to be on a committee and not been  
 23 picked for it?  
 24 A Yes.  
 25 Q Did that upset you?

Froman - by Defendant - Direct/Ms. Rogers Page 3900

1 A No. I -- I indicated we all get a chance as directors  
 2 to fill out a form indicating which committees we want to serve  
 3 on, but then it's up to the president to choose those people  
 4 that he or she wants to have serve on the committee and I know  
 5 I'm not going to always get what I pick.  
 6 Q All right. So now let's go back to the nominating  
 7 committee which you have served on.  
 8 Does Wayne LaPierre pick the nominating committee?  
 9 A No. The nominating committee is elected by the NRA  
 10 Board of Directors.  
 11 Q But isn't there some incentive to vote the way Wayne  
 12 wants you to vote?  
 13 A I don't know of any incentive.  
 14 I will tell you that when I was -- as a director, my  
 15 job is to pick the nine people I thought would best serve the  
 16 NRA on the nominating committee. There are rules. You can only  
 17 have six Board members on the nominating committee. Three  
 18 people have to be outsiders, people who aren't on the Board.  
 19 And most of the time because I have been on the Board so long, I  
 20 would know the six people who were being proposed.  
 21 We often had more than nine people nominated for the  
 22 nominating committee. Then the Board has to vote. So some  
 23 people have to be excluded.  
 24 When I didn't know one of the three people who was  
 25 being proposed for the Non-Board member slots, I would ask

Froman - by Defendant - Direct/Ms. Rogers Page 3901

1 questions. I would ask questions of the NRA president. I would  
 2 ask questions of Wayne LaPierre. I would ask questions of my  
 3 fellow Board members.  
 4 For example, if someone gets nominated from the State  
 5 of Delaware, we have a Delaware director on our Board, gentleman  
 6 by the name of John Sigler. I would go to John. Delaware's a  
 7 relatively small state. And I would say John, do you know this  
 8 person. They claim to be an active NRA member in Delaware.  
 9 They claim to have done all these things, put on these NRA  
 10 programs in Delaware. Do you know this person? And I would  
 11 trust that John would be honest with me and tell me I know this  
 12 person. He is a great guy or I don't know her. I have never  
 13 heard of her. She's not even a member of our State Association,  
 14 and that would kind of raise heckles on the back of my neck, and  
 15 I would ask more questions of more about why is this person  
 16 being proposed.  
 17 So I sought input from as many people as I could until  
 18 I was satisfied that this was someone that I could support.  
 19 Q Did anyone ever give you a crib sheet of who to vote  
 20 for?  
 21 A I never heard that term.  
 22 Q Did anyone ever make suggestions as to who we think  
 23 would be great for the nominating committee?  
 24 A Yes. I myself made suggestions when I was not on the  
 25 nominating committee. I would go to the Vice-Chair of the

NYAG v  
NRA

February 8, 2024

Froman - by Defendant - Direct/Ms. Rogers Page 3902

1 nominating committee, and I would say, I think these people  
 2 ought to be considered for the Board.  
 3 Q When you received suggestions of who to vote for, did  
 4 you always vote consistently with those suggestions?  
 5 A No.  
 6 Q Now, when you vote for the nominating committee, do you  
 7 raise your hand or is it a secret ballot?  
 8 A It's a secret ballot.  
 9 Q So if you voted the way Wayne didn't want you to, he  
 10 would never know.  
 11 A Correct.  
 12 Q What would you say to the allegation that some part of  
 13 the Board is entrenched?  
 14 A I don't think that's true. I think that we as Board  
 15 members, we all get elected every three years. You run for  
 16 Board seat every three years. It's the members who vote for you  
 17 by mail ballot. So I have been elected every three years since  
 18 I first came on the Board in 1992.  
 19 We have a bio -- a little short bio in the magazine  
 20 next to the ballot. People read your bio. I have had hundreds  
 21 of phone calls from people who didn't know me personally but  
 22 called me up to say, I see you're running for the NRA Board, but  
 23 what do you feel about this issue or that issue, and I would try  
 24 to answer as many as I could.  
 25 The members elect the Board. Wayne doesn't elect the

Froman - by Defendant - Direct/Ms. Rogers Page 3903

1 Board. I don't think Wayne would want to elect the Board. He  
 2 is busy doing other things and has been busy doing other things.  
 3 People who think that any one person runs the NRA, it's  
 4 just not true. It's -- it has not been true in my 30 years of  
 5 experience.  
 6 That doesn't mean that we don't ask one another for  
 7 advice or recommendations for help. It's a matter of judgment  
 8 how you vote for the Board of Directors, and I have had a lot of  
 9 people come to me and say I don't like this person. I don't  
 10 trust this person. I want to hear what they have to say.  
 11 I will ultimately make my own judgment to the best of  
 12 my ability, but the more information, the better as far as I'm  
 13 concerned.  
 14 Q Even though Wayne LaPierre can't control the nominating  
 15 committee, would it be fair to say sometimes people have wanted  
 16 to know his opinion about things?  
 17 MR. WANG: Objection. Leading.  
 18 A Of course.  
 19 I have asked -- when I didn't know someone myself  
 20 personally and a name was floated and someone might say, well,  
 21 Wayne thinks that's a good person for the nominating committee I  
 22 would go to Wayne and say who is this person. I don't know  
 23 them. Why do you think they would be good?  
 24 Sometimes he said it wasn't my idea. So people often  
 25 said it was Wayne's idea when Wayne said no, it wasn't my idea.

Froman - by Defendant - Direct/Ms. Rogers Page 3904

1 I think there were a lot of people on the Board from  
 2 time to time who would purport to speak for Wayne LaPierre and  
 3 maybe it wasn't really what Wayne LaPierre would have said if  
 4 you asked him yourself. So I took a lot of that with a grain of  
 5 salt. I tried to as I said gather information, make my own  
 6 decision to the best of my ability.  
 7 Q How long have you known Mr. LaPierre?  
 8 A Since I joined the Board in 1992.  
 9 THE COURT: Counsel, when we reach a time between  
 10 subjects for a break.  
 11 MS. ROGERS: Now is a good time actually.  
 12 THE COURT: We will take a short break, let the  
 13 jury stretch for little bit.  
 14 Just the common instructions during a break. You  
 15 are still on the stand, so you shouldn't discuss your  
 16 testimony with anyone including counsel.  
 17 THE WITNESS: Certainly, your Honor.  
 18 (Whereupon, at this time the jury exits  
 19 the courtroom.)  
 20 (Whereupon at this time there was a recess taken.)  
 21 (Witness resumed the witness stand.)  
 22 THE COURT OFFICER: All rise. Jury entering.  
 23 (Whereupon, at this time the jury entered the  
 24 courtroom.)  
 25 CONTINUED DIRECT EXAMINATION

Froman - by Defendant - Direct/Ms. Rogers Page 3905

1 BY MS. ROGERS:  
 2 THE COURT: Thank very much. Please have a seat,  
 3 everyone.  
 4 All right, Ms. Rogers. You may continue.  
 5 MS. ROGERS: Thank you.  
 6 Q Welcome back, Ms. Froman.  
 7 So you described how the nominating committee is  
 8 picked.  
 9 Now, whom does the nominating committee pick?  
 10 A The nominating committee nominates people to run for  
 11 the Board of Directors.  
 12 Q If a nominating committee doesn't pick you to be on  
 13 that slate, that ballot, are you prevented from getting elected  
 14 to an officer position?  
 15 A No. Our Bylaws also provide that you can run by  
 16 petition. You gather petition signatures to support your  
 17 nomination, and you submit those petitions to the Office of the  
 18 Secretary, and if you meet the requirements of gathering enough  
 19 petition signatures, you are put on the ballot.  
 20 Q What are the leadership positions that -- the officer  
 21 positions on the board?  
 22 A Okay. The unpaid officers are the president, the first  
 23 vice-president and the second vice-president.  
 24 Q You described the president before as your boss. But  
 25 we have also heard testimony that sometimes the presidency is

NYAG v  
NRA

February 8, 2024

Froman - by Defendant - Direct/Ms. Rogers Page 3906

1 ceremonial.

2 What do you think about that?

3 A The president certainly has a lot of ceremonial

4 functions appearing on behalf of the NRA as president. I

5 remember going to many events when I was president being

6 introduced in that capacity, but the president also has work to

7 do including the work of managing the committees and also work

8 in sometimes reviewing management documents.

9 I remember I had to review a lot of business documents

10 when I was president.

11 Q How did you become president?

12 A I came on the Board in 1992, and in approximately 1996,

13 I was asked if I would be interested in coming in as second

14 vice-president which is the lowest level of volunteer elected

15 office, and I was very humbled and kind of flattered to be

16 asked. And I said yes, I would be willing to do that, and I

17 would be willing to spend the time that was needed to serve in

18 that office. So I said yes.

19 The nominating committee nominated me, and I was

20 elected at that 1992 annual meeting. I'm sorry. The -- the 199

21 -- see I was -- I think it was the 1997 or 8. It was 1998

22 annual meeting of members. So I had to run for it in '97. I

23 was elected in '98. I'm going back a long way now.

24 Q We have been clarifying all the witnesses' time period

25 focus, so if this has varied over time, let me know. And if

Froman - by Defendant - Direct/Ms. Rogers Page 3907

1 not, you can just answer. But what is the compensation

2 committee and whose compensation do they determine?

3 A The compensation committee has changed over time. I

4 believe it's the -- currently the three volunteer officers of

5 the NRA which would be the president, the first vice-president

6 and the second vice-president. They determine the compensation

7 of the paid officers of the NRA which are the executive

8 vice-president, the secretary and the treasurer.

9 Q When you were president, how was compensation set?

10 A Compensation of the president -- I'm sorry.

11 Compensation of the executive vice-president who is functionally

12 the CEO of NRA was set by looking at comparison studies of other

13 CEO's of similarly sized non-profit organizations.

14 I asked for -- my time as president, I asked for

15 preparation of outside reports about what CEOs of similarly

16 sized non-profits were making, and as I recall, the compensation

17 of the executive vice-president then and still Wayne LaPierre

18 was set kind of in the middle. There were larger organizations

19 and smaller organizations, but -- and there were ones that paid

20 their CEOs more, and some paid their CEOs less, but ours was

21 pretty much squarely in the middle.

22 Q Before you were president, you were second

23 vice-president of the NRA; right?

24 A Yes.

25 Q Who was the president that you came up under?

Froman - by Defendant - Direct/Ms. Rogers Page 3908

1 A The year I was elected as second vice-president, 1998,

2 Charlton Heston was elected as president of the NRA.

3 Q Who is Charlton Heston?

4 A Charlton Heston was an incredibly well-known movie and

5 television actor from the 1950's, 1960's. He was Moses in the

6 Ten Commandments. He was Ben-Hur in the movie of the same name.

7 My favorite Charlton Heston role is when he was in the

8 Planet of the Apes, but he was extremely well known. He was my

9 mother's favorite actor of that time period, so I saw a lot of

10 Charlton Heston on TV before I met him at NRA, but he came to

11 NRA first as the 76th Director.

12 The process of getting elected for that one-year term,

13 the way I described it, he came in in 1997, became the 76th

14 Director and was elected as first vice-president in 1997 that

15 same year. Then the following year in 1998 he was elected as

16 president.

17 Q Did you develop a view of his performance as president?

18 A Yes. He was extraordinary. He made the NRA a

19 household name. He brought a lot of positive attention to the

20 NRA. He brought a lot of people who knew him as an actor and

21 knew him as the president of the Screen Actors Guild, not an

22 insignificant organization in and of itself.

23 He brought those people in the NRA and let them know

24 that the NRA was more than a political organization, that we had

25 a lot of good programs that we delivered to firearms owners and

Froman - by Defendant - Direct/Ms. Rogers Page 3909

1 people who didn't own firearms all over the country.

2 Q Were the NRA's Bylaws changed to allow Mr. Heston to

3 occupy an office for a particular period of time?

4 A Yes. So under our Bylaws, before Mr. Heston was

5 elected president, you could serve as long as you wanted as

6 second vice-president if the Board continued to elect you.

7 You could serve as long as you wanted as first

8 vice-president if you were reelected by the Board, but you could

9 only serve as president for two one-year terms. You had to be

10 elected each year. But after your second year of president, you

11 could no longer serve.

12 I think the Board realized pretty early on in Mr.

13 Heston's presidency he was an extraordinary person and

14 extraordinary value to the NRA and our mission, and the Board

15 amended the Bylaws to allow him to be reelected to succeed

16 himself for what ended up being a total of five years. So he

17 was five years as president of the NRA from 1992 to 2003.

18 Q And why did Mr. Heston leave the Board?

19 A Mr. Heston announced in 2002 that he had Alzheimer's,

20 and it was beginning to affect his ability to do his job as NRA

21 president, and I think if it hadn't been for that, he would have

22 continued to serve and would have continued to be reelected, but

23 that's why he ultimately did not run for any more terms as

24 president.

25 Q Can you describe some of the ways the NRA responded

NYAG v  
NRA

February 8, 2024

Froman - by Defendant - Direct/Ms. Rogers Page 3910

1 when its prominent public advocate Charlton Heston became ill?  
 2 A It was tough because we got used to having a face and a  
 3 name out there that would draw attention to our organization and  
 4 speak for our organization, and we realized that we would lose  
 5 Mr. Heston's public appearance abilities, and we had to have our  
 6 executive vice-president Wayne LaPierre really step up and take  
 7 center stage. He had always been working. He had always been  
 8 out there often accompanying Mr. Heston in representing the NRA,  
 9 but now he was going to have to be that face, that name, and  
 10 those of us on the Board pushed him to do it and he was willing  
 11 to do it.  
 12 Q Did the public advocacy role of some other directors  
 13 like you change too?  
 14 A Yes. Now that Mr. Heston was not able to stay and  
 15 Wayne LaPierre was doing more and more of the work that Mr.  
 16 Heston had done in the past, many of us, especially former  
 17 presidents who had been in the Chairs, we knew what the NRA  
 18 stood for. We were articulate about it. We were asked to do  
 19 more speaking on behalf of NRA, and I was asked to do more  
 20 speaking on behalf of NRA.  
 21 Q We talked about how you became president. But just  
 22 very quickly, how did you get on the Board in the first place?  
 23 A I was a NRA member already from the early eighties when  
 24 I had that bad experience with the attempted break-in home  
 25 invasion. And I was speaking at a rally in Phoenix in 1991 and

Froman - by Defendant - Direct/Ms. Rogers Page 3911

1 was approached by a man by the name of Bob Corbin who was then  
 2 the Attorney General of the State of Arizona where I lived at  
 3 the time and he had been in office I think for 10 or 11 years.  
 4 He was a very long-standing Attorney General, and he asked me  
 5 after he heard me speak -- he said, have you ever thought of  
 6 running for the NRA Board of Directors. And I said no. And he  
 7 said, I think you should, and I would support you. And I was  
 8 also approached by a gun rights activist who also lived in  
 9 Arizona at the time, a man by the name of Neal Knox. I knew him  
 10 from his writing in a newspaper that he published, and he asked  
 11 me if I would run for the NRA Board of Directors, and I said  
 12 yes, I will, and he supported me also.  
 13 So I had these two pretty powerful activists urging me  
 14 to run for the Board. I talked to my husband at the time and he  
 15 said I think you should do it. And so I did. I filled out a  
 16 very lengthy questionnaire that's required for new Board members  
 17 and submitted that to the Office of the Secretary and the  
 18 nominating committee nominated me.  
 19 Mr. Knox also circulated petitions on my behalf to  
 20 enable me to run as a petition candidate in case the nominating  
 21 committee chose not to nominate me. And so I ran both as a  
 22 petition candidate and a nominating committee for the Board, and  
 23 I was elected to the Board that year in 1992.  
 24 Q You testified earlier that Board members sometimes  
 25 vigorously disagree with each other; right?

Froman - by Defendant - Direct/Ms. Rogers Page 3912

1 A Yes.  
 2 Q Did there come a time when Neal Knox who helped you get  
 3 on the Board was involved in one of those vigorous  
 4 disagreements?  
 5 A Yes.  
 6 Q Can you describe that?  
 7 A Well, Neal was working his way up through the Chairs of  
 8 the NRA, and I'm talking about the volunteer positions now to  
 9 become president of the NRA, but it all became apparent over the  
 10 years from 1992 until 1997 when I was just a Board member that  
 11 he wanted to become executive vice-president of the NRA and to  
 12 receive a salary for that, and he was complaining I guess is the  
 13 best way to say it or telling people that the NRA was in  
 14 trouble, that Wayne LaPierre was mismanaging the finances, that  
 15 the NRA was about to go bankrupt and that we should all vote for  
 16 him as president and eventually he would get rid of Wayne  
 17 LaPierre.  
 18 I was fairly new on the Board even though I had been  
 19 there for several years. When you have that many people on a  
 20 Board of Directors, it's hard to get to know everybody. It's  
 21 just a lot of people to meet and to get to know them especially  
 22 when you only meet three times a year.  
 23 So I went to Neal Knox who I considered a friend, and I  
 24 said why are you saying this. Show me the paperwork that says  
 25 we are about to go bankrupt, we are in trouble financially, that

Froman - by Defendant - Direct/Ms. Rogers Page 3913

1 Wayne's mismanaging the assets. And the response I got from  
 2 Neal at that time was, just do what you're told. Just vote for  
 3 me. You don't need to know anything else.  
 4 So I did the same thing with Mr. LaPierre. I went to  
 5 him, and I said this is what Mr. Knox is saying. Tell me why he  
 6 is wrong. Explain to me why we are fine financially and that I  
 7 should continue to support the people whom were in office at the  
 8 time.  
 9 He said, I think you should go see the financial office  
 10 at NRA, and he told them in my presence, show her anything she  
 11 wants to see. Explain to her what these documents are. The  
 12 drawers are open. You can look at anything you want. And I  
 13 didn't understand perhaps every single document I looked at  
 14 because I'm not an accountant, but what I did understand was Mr.  
 15 LaPierre was not afraid for me to look at anything and Mr. Knox  
 16 was not giving me any access to the information that he was  
 17 using to make his argument, and that's how I made my decision to  
 18 support Mr. LaPierre and not Mr. Knox.  
 19 Q Now you testified that Mr. Knox disagreed with how Mr.  
 20 LaPierre was managing the Association's financial assets; right?  
 21 A Yes.  
 22 Q Have you formed a view on whether if Mr. Knox had won,  
 23 the NRA would be financially better off?  
 24 A I think --  
 25 MR. WANG: Objection. Calls for speculation.

Froman - by Defendant - Direct/Ms. Rogers Page 3914

1 THE COURT: I am asking for her judgment as a Board  
 2 member.  
 3 THE COURT: Sustained.  
 4 Q Ms. Froman, what fight -- what did Mr. Knox disagree  
 5 about?  
 6 A Mr. Knox felt that we had to liquidate our assets  
 7 including our entire stock portfolio and that's what he was  
 8 urging. He was urging me to vote for him and put him in charge  
 9 so he could do that. This was in 1997.  
 10 Q And with the benefit of hindsight as a fiduciary of the  
 11 NRA, do you have a view on whether the NRA would have benefitted  
 12 from liquidating all its stock in 1997?  
 13 A It would have been a disaster.  
 14 MR. WANG: Objection. Same basis.  
 15 THE COURT: Overruled.  
 16 A It would be a disaster. Look at what's happened with  
 17 the stock since 1997.  
 18 Q Your term as president ended in spring of 2007;  
 19 correct?  
 20 A My term as president ended in 2007, yes.  
 21 Q And you mentioned that your role as an advocate  
 22 publically for the NRA increased after Mr. Heston got sick;  
 23 right?  
 24 A Yes, and -- but when I -- when I was an officer, I was  
 25 out there speaking on behalf of the NRA as an officer.

Froman - by Defendant - Direct/Ms. Rogers Page 3915

1 Q So after you left the presidency, you continued  
 2 speaking publically; right?  
 3 A Yes.  
 4 Q Who asked you to do this?  
 5 A Wayne LaPierre. The head of our fundraising department  
 6 asked me. Various members of the Board of Directors asked me.  
 7 NRA members out in the country who had met me at various  
 8 functions would ask me to come back and speak to their Clubs,  
 9 their Associations. I loved speaking. I was very enthusiastic  
 10 about it, and people wanted me to continue, but I wasn't sure  
 11 that was something I was supposed to be doing now that I was no  
 12 longer president.  
 13 Q Can you describe the work that you did in that role?  
 14 A Wow. I probably in the period of time from 2008 to  
 15 about 2018, I spoke to at least 50 law schools around the  
 16 country to the law students who would become lawyers, judges,  
 17 justices and probably an equal number of service groups like  
 18 Rotary or the Kiwanis. I spoke to political clubs. I spoke to  
 19 groups of lawyers -- practicing lawyers for their legal  
 20 continuing legal education requirements, professional  
 21 requirements.  
 22 I spoke at and actually helped a gentleman who was  
 23 putting together a 14-week course on guns in America for older  
 24 learners that was sponsored by the University of Arizona. He  
 25 was not a friend of guns, but he was somebody who wanted to

Froman - by Defendant - Direct/Ms. Rogers Page 3916

1 present both sides of the issue. And so he asked me if I would  
 2 come talk at his -- at one of his classes. And then after I  
 3 did, he had me serve on a panel. And then he asked for my help  
 4 on finding people to speak both for and against some of the  
 5 issues, like individual rights to own a gun, like concealed  
 6 carry, things that like that were kind of hot topics at the time  
 7 on gun ownership.  
 8 Q About how many times per year did you speak?  
 9 A At least a dozen times a year. Maybe more.  
 10 Q Were you paid for giving these speeches?  
 11 A No.  
 12 Q But you did receive some money; right?  
 13 A I did, yes.  
 14 Q Describe that arrangement.  
 15 A Well, when I was asked by Wayne LaPierre and the head  
 16 of the advancement office if I would continue to speak about NRA  
 17 and about the Second Amendment and the importance of the Second  
 18 Amendment to our Constitution and our freedom in our country, I  
 19 said, well, I'm happy to volunteer. I don't want to charge my  
 20 hourly rate that I was charging my clients for my work, but I  
 21 needed some support to cover the overhead of my law office  
 22 because I couldn't be gone to be doing this and not be able to  
 23 keep my law office open because that's how I made my living. I  
 24 was practicing. I had a solo practice at the time, and it  
 25 was -- it was something that I needed in order to be able to do

Froman - by Defendant - Direct/Ms. Rogers Page 3917

1 what NRA wanted me to do. So I sat down with someone in the  
 2 treasurer's office, and I said this is what I think it will cost  
 3 to be able to support my speaking engagements, and they said  
 4 that's fine. Send us an invoice, and I did.  
 5 Q And this was probably sometime before 2015; right?  
 6 A Yes.  
 7 Q Was it closer to 2008 than 2015?  
 8 A Yes.  
 9 Q Was there ever a written contract for the NRA's  
 10 supporting your speaking work?  
 11 A No.  
 12 Q Could that kind of arrangement be made today to the  
 13 NRA?  
 14 A No because now we have a requirement that every  
 15 payment -- every arrangement like that has to be supported by a  
 16 written contract approved in accordance with the new controls,  
 17 procedures and purchasing policies.  
 18 Q How do you know that the NRA has new controls  
 19 preventing non-verbal contracts or -- I'm sorry -- unwritten  
 20 contracts like yours?  
 21 A Because the Board has been informed at Board meetings  
 22 that these new processes and procedures were being put in place  
 23 over a period of several years, and we were updated periodically  
 24 at Board meetings that we were changing the rules.  
 25 We were -- we were updating, strengthening the rules so

NYAG v  
NRA

February 8, 2024

Froman - by Defendant - Direct/Ms. Rogers Page 3918

1 that we would not be in a position that frankly got us here  
2 today.  
3 Q Did you report the speaking fees you received on your  
4 financial disclosure questionnaires to the NRA?  
5 A Not at first because I understood them to be  
6 reimbursement of expenses, but they were reported on the 990s.  
7 Q Did anyone at the NRA monitor your speaking activity to  
8 make sure you were doing what you were being paid for?  
9 A I don't know if they monitored, but I was constantly  
10 reporting to them this is where I went to speak, this is how big  
11 the audience was, this was the subject that I talked about.  
12 I wanted feedback from the NRA as to whether I was  
13 doing what they thought would be most valuable to the  
14 Association, so I probably talked more than I should have trying  
15 to let people know what I was doing, and I was saying -- I would  
16 remember saying very often to Wayne LaPierre, if you think I'm  
17 not doing what you want me to be doing for the NRA, let me know  
18 and we will change it.  
19 Q You stopped giving these speeches around 2018; right?  
20 A Yes.  
21 Q Why?  
22 A I was sort of powering down my speaking engagements. I  
23 was getting ready to retire from my law practice which I did  
24 retire at the end of December 2019, and there were other people  
25 out there speaking, and I just figured it was time to move on to

Page 3919

1 other things.  
2 Q What was the atmosphere at the NRA like in 2017?  
3 A It was tumultuous. We were starting to learn of  
4 threats to the existence of the National Rifle Association.  
5 When I say "we," we as a Board of Directors. There was  
6 a lot of discussion about that, and we were starting to look at  
7 what we needed to do to protect the Association.  
8 (Continued on the following page.)  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

S. Froman - by Defendant - Direct/Ms. Rogers Page 3920

1 Q And in 2021, the NRA filed for bankruptcy; right?  
2 A Yes.  
3 Q As a bankruptcy lawyer, what kind of considerations did  
4 you evaluate when you decided to ratify that filing?  
5 MR. WANG: Objection, your Honor. Calling for her  
6 to make expert legal opinion on a bankruptcy.  
7 THE COURT: No, she's asking about her reaction as  
8 a board member.  
9 MS. ROGERS: Yeah, I'll rephrase it.  
10 Q So, you had been a lawyer working on sophisticated  
11 bankruptcies at a big law firm; right?  
12 A I worked on a lot of things, including bankruptcies,  
13 very high level bankruptcies.  
14 Q Did that inform your judgment as a board member?  
15 A Of course.  
16 Q In spring of 2021, you voted to ratify the NRA  
17 bankruptcy filing; right?  
18 A Yes.  
19 Q Why?  
20 A Because I thought it was the right thing to do. I,  
21 frankly, was not entirely pleased with how it came about, but I  
22 was not part of that decision. I was, in fact, not in the room  
23 when the contract with Mr. LaPierre was ratified. I had recuse  
24 myself for other reasons.  
25 But once the bankruptcy was filed and it was something

S. Froman - by Defendant - Direct/Ms. Rogers Page 3921

1 that I thought could help protect the association, I voted to  
2 ratify it.  
3 Q You were friends with Ollie North; right?  
4 A Professional colleagues, let's say. I mean, when  
5 people say friends with, I think, you know, did they invite me  
6 home to dinner with their family. No, I never got invited home  
7 to dinner with Mr. North.  
8 Q Did you know he raised concerns he thought outside  
9 counsel fees were too high?  
10 A He did with me yes.  
11 Q Did you examine that issue?  
12 A I did.  
13 Q What did you conclude?  
14 A Mr. North said to me -- I was in the building one day,  
15 in the building at NRA Headquarters in Fairfax, Virginia, and  
16 for a meeting having to do with something else. My plane wasn't  
17 until the next day.  
18 So, I had time walking around the building, seeing who  
19 was in their office that I could say hello to. And I happened  
20 to find Mr. North and he called me in and he was complaining  
21 about the Brewer firm's fees being too high. I said, "What do  
22 you mean too high?" He said, "Well, they're just too high."  
23 So I said, "Well, do you think they're billing for work that  
24 they're not doing?" And he said, "Well, no, I don't know that."  
25 I said, "Well, litigation is very expensive." I had an

S. Froman - by Defendant - Direct/Ms. Rogers Page 3922

1 experience as a litigation attorney and it's very expensive, and  
 2 he wasn't giving me any measurable way to evaluate his statement  
 3 that they were too high.  
 4 And, he kept repeating the same sentence which kind of  
 5 caused me to believe that somebody told him to say it. He was  
 6 repeating a part of a script, if you will, and I kept  
 7 questioning him about it. And I said, "Well, are you reviewing  
 8 the fees?" And he said, "No. I said, "Well, who is reviewing  
 9 the fees?" He said, "John Frazer," the corporate secretary at  
 10 the time. I said, "Well, do you have a problem with his  
 11 review?" He says, "well, I don't know. They're just too high."  
 12 He just kept saying that over and over again. So I did  
 13 follow that conversation up with investigating who was reviewing  
 14 the fees, the fact that the fees were being reviewed by the  
 15 appropriate people at NRA was what I was concerned about.  
 16 Q You've reviewed the legal filings including this one  
 17 that have come out; right? Did you look at the attorney  
 18 general's complaint?  
 19 A Yes.  
 20 Q And you've read some of the bankruptcy testimony;  
 21 right?  
 22 A Yes.  
 23 Q And you still voted for Wayne LaPierre the last year he  
 24 ran before his resignation; right?  
 25 A Yes.

S. Froman - by Defendant - Direct/Ms. Rogers Page 3923

1 Q Why?  
 2 A Because I thought he was in a position to help see us  
 3 through this incredibly difficult time. He was the one who had  
 4 started the course correction that had led us to make changes  
 5 that were important to the future of the NRA.  
 6 He gave all of our employees, especially our Financial  
 7 Services Department full access to every piece of information  
 8 that they needed to make sure we strengthened our policies,  
 9 strengthened our control processes and he did that knowing that  
 10 he was probably going to be one of the people who would be found  
 11 out to engaged in misconduct, financial misconduct that was not  
 12 in the best interest of the NRA.  
 13 I thought that was -- brave may not be the right word,  
 14 but he knew that he was going to be one of the people who was  
 15 going to be told, You shouldn't be doing this and you're going  
 16 to have to pay this back which, in fact, did occur. But he, I  
 17 remember saying to me, he said "I don't care if I lose every  
 18 friend I have ever had, we will get to the bottom of this and we  
 19 will fix it and we will save the NRA."  
 20 And even though we went through a lot of issues from  
 21 2016 to the bankruptcy filing, I felt then and up until the time  
 22 he resigned or retired in January, I felt he was the person who  
 23 could help us steer the ship through the rough waters until we  
 24 came to the destination which we needed to arrive at.  
 25 MS. ROGERS: Thank you. Pass the witness.

S. Froman - by Defendant - Direct/Mr. Fleming Page 3924

1 THE COURT: Any other direct testimony?  
 2 MR. CORRELL: No, your Honor.  
 3 MR. FARBER: No, your Honor.  
 4 MR. FLEMING: Very brief.  
 5 DIRECT-EXAMINATION  
 6 BY MR. FLEMING:  
 7 Q Hi, Ms. Froman?  
 8 A Hello.  
 9 Q I'm William Fleming. I represent Mr. Frazer. Just a  
 10 very quick question.  
 11 Have you had occasion to interact with Mr. Frazer  
 12 during your time and his time at the NRA?  
 13 A Overwhelmingly yes, a lot.  
 14 Q In what capacities does that happen?  
 15 A He -- John Frazer was -- worked for the Institute for  
 16 Legislative Action at NRA, which is the political arm of NRA  
 17 when I first came to the board so I dealt with him there.  
 18 And then when he became -- he went to law school while  
 19 he was also working for the NRA; and I don't know at what point  
 20 he actually became our General Counsel and the corporate  
 21 secretary, but I dealt with him in both those capacities, both  
 22 as the secretary who deals with the NRA board of directors.  
 23 He's responsible for the preparation of all the minutes and  
 24 other documents, notices of meetings. As a committee chair I  
 25 would have to ask him to notice meetings that I wanted my

S. Froman - by Defendant - Direct/Mr. Fleming Page 3925

1 committee to hold.  
 2 And as the General Counsel of the NRA, it was my  
 3 responsibility as chairman of the Legal Affairs Committee to  
 4 obtain reports from him several times a year on what the legal  
 5 matters were that the NRA was handling through the office of  
 6 General Counsel.  
 7 Q And he would brief the Legal Affairs Committee?  
 8 A Yes.  
 9 Q And did you find his briefings helpful and informative?  
 10 A Helpful, informative and very thorough.  
 11 Q Did you have any kind of exposure to his work on  
 12 related-party transactions?  
 13 A Yes. I would ask him questions. If I had questions  
 14 about myself, should I be reporting something or not reporting  
 15 something, and he would answer.  
 16 And I remember him coming up to me and telling me, "You  
 17 need to be reporting this," so I started reporting it. He took  
 18 the initiative on that one.  
 19 Q And did you experience an expansion of the financial  
 20 disclosure questionnaire during Mr. Frazer's time in office?  
 21 A Yes, it changed.  
 22 Q So, from your observations, do you have any views on  
 23 Mr. Frazer's integrity?  
 24 A I felt then when he first came into that role and I  
 25 feel now that he has the highest integrity.

NYAG v  
NRA

February 8, 2024

S. Froman - by Defendant - Direct/Mr. Fleming Page 3926

1 Q One last question for you. Do you have any view based  
 2 on your observations of his professional competence?  
 3 A Not as much because I didn't actually work with him on  
 4 the underlying matters that were being handled by the office of  
 5 General Counsel; but I do know that when I went to him with a  
 6 specific question about a specific matter, he would answer me  
 7 and he would say, Well, we've hired local counsel for that or  
 8 we've done something else for this.  
 9 So, I felt like he knew his limitations based on his  
 10 experience. I mean, I'm a lot older than him and I had a lot  
 11 more opportunities for experience, but I felt he was -- he had a  
 12 good handle on what he was capable of and that he would ask for  
 13 help from others if he felt he needed it.  
 14 Q Was he attentive to the NRA's issues?  
 15 A Yes, very attentive.  
 16 Q Did he act in the NRA's best interest in your view?  
 17 A In my opinion, yes.  
 18 MR. FLEMING: Thanks so much.  
 19 THE COURT: Okay, cross examination, Mr. Wang.  
 20 MR. WANG: Good afternoon. May I proceed your  
 21 Honor?  
 22 THE COURT: Yes, please.  
 23  
 24 (Continued on next page)  
 25

S. Froman - by Defendant - Cross/Mr. Wang Page 3928

1 MR. WANG: Ms. Froman testified about her speaking  
 2 engagements.  
 3 THE COURT: Her own.  
 4 MR. WANG: These payments go to show the bias  
 5 within the testimony of the witness along with the fact that  
 6 other individuals on the board were paid for speaking  
 7 engagements, as well.  
 8 THE COURT: That may be true, but it is still not  
 9 within the scope of the direct.  
 10 MR. WANG: I'll move on, your Honor.  
 11 Q Ms. Froman, you received approximately \$45,000 a year  
 12 from the NRA from 2008 to 2018; correct?  
 13 A I'm not sure about 2018. It might have been a little  
 14 less than that, but the answer is yes as to the other years  
 15 you've mentioned.  
 16 Q And that amount was paid by a flat fee; correct?  
 17 A Correct.  
 18 Q But you thought that that amount was paid for the  
 19 reimbursement of expenses; correct?  
 20 A Correct.  
 21 Q But that would mean that you would have incurred the  
 22 exact same amount of expenses every month for ten years if these  
 23 fees were actually for expenses; correct?  
 24 A I wouldn't agree with that. I think that's an  
 25 incorrect statement.

S. Froman - by Defendant - Cross/Mr. Wang Page 3927

1 CROSS-EXAMINATION  
 2 BY MR. WANG:  
 3 Q Good afternoon, Ms. Froman.  
 4 A Good afternoon. And your name?  
 5 Q My name is William Wang, I'm an Assistant Attorney  
 6 General with the Attorney General's office.  
 7 How are you?  
 8 A Thank you, Mr. Wang.  
 9 Q You are a past president of the NRA; correct?  
 10 A Yes.  
 11 Q And you're familiar with Ms. Marion Hammer; right?  
 12 A Yes.  
 13 Q She was also a past president of the NRA; correct?  
 14 A Yes.  
 15 Q And Ms. Hammer receives money from the NRA as a  
 16 consultant or lobbyist; correct?  
 17 A She has in the past. I don't know if she still does  
 18 now.  
 19 Q Mr. Keene is a past president of the NRA as well;  
 20 correct?  
 21 A Yes.  
 22 Q And Mr. Keene has received money from the NRA in the  
 23 past as well; correct?  
 24 MS. ROGERS: Objection, outside the scope.  
 25 THE COURT: Sustained.

S. Froman - by Defendant - Cross/Mr. Wang Page 3929

1 Q You were paid a flat amount, correct?  
 2 A Correct.  
 3 Q And you created invoices; correct?  
 4 A My office did.  
 5 Q And those invoices weren't reimbursements of expenses;  
 6 correct?  
 7 A In my mind, yes, they were.  
 8 Q Were these invoices including airfare, hotel and  
 9 meals?  
 10 A No.  
 11 Q And these payments that you received, you never  
 12 disclosed them on a financial disclosure form until 2019;  
 13 correct?  
 14 A I don't remember the year that I first started  
 15 disclosing them; but that was the time when Mr. Frazer said to  
 16 me "You need to start disclosing these."  
 17 They were disclosed in the 990. They were available  
 18 to all board members who reviewed the 990s from the time I  
 19 started receiving them and, indeed, available to members of the  
 20 public.  
 21 Q Ms. Froman, I'm just asking you a yes or no question.  
 22 You didn't disclose these payments until 2019 on a  
 23 financial disclosure form; correct?  
 24 A I don't know. If you ask me that question that I  
 25 didn't disclose them through 2017, I would say yes. I'm not

NYAG v  
NRA

February 8, 2024

S. Froman - by Defendant - Cross/Mr. Wang Page 3930

1 sure about '18 and '19. If you want to show them to me, that  
 2 would be an easy way to find out.  
 3 Q There was no written contract for these payments;  
 4 right?  
 5 A Correct.  
 6 Q You said you know who Marian Hammer is; correct?  
 7 A Yes.  
 8 Q And you've spoken with her about board elections,  
 9 correct?  
 10 A Many times.  
 11 Q I'm going to show you a document that has been marked  
 12 PX 1256 for identification.  
 13 MR. WANG: May I provide a document to the witness,  
 14 your Honor?  
 15 (Handed to the witness)  
 16 Q Ms. Froman, I'm showing you a four-page document. It  
 17 is dated January 15, 2018.  
 18 Does this look familiar to you?  
 19 A Vaguely.  
 20 Q I'll represent to you this was -- where it says "Sandy  
 21 personal," this was how the document was produced to us and we  
 22 have -- we're redacting any personally identifying information.  
 23 A Okay, thank you.  
 24 Q And you said you've had conversations with Ms. Hammer  
 25 about board elections; correct?

S. Froman - by Defendant - Cross/Mr. Wang Page 3931

1 A Many conversations with Ms. Hammer about board  
 2 elections over the last roughly thirty years.  
 3 MR. WANG: I move to admit PX 1256.  
 4 MS. ROGERS: No objection.  
 5 THE COURT: It is admitted.  
 6 (Whereupon, at this time Exhibit PX 1256 was  
 7 admitted and received into evidence.)  
 8 Q You replied to this e-mail and complimented Ms. Hammer  
 9 on her message entitled "The Enemy Within," correct?  
 10 A Yes.  
 11 Q And this is a long message from Ms. Hammer; but at the  
 12 end of the message starting at the bottom of page 3 and going on  
 13 to page 4, Ms. Hammer provides her opinions on which directors  
 14 she will be voting for; correct?  
 15 A That's right. It is an endorsement of that slate.  
 16 Q And she's encouraging other people to vote for those  
 17 same directors; correct?  
 18 A Correct.  
 19 Q You testified that you served on the Nominating  
 20 Committee; correct?  
 21 A I served on the Nominating Committee on several  
 22 occasions.  
 23 Q And you've also testified that in fact you chaired the  
 24 Nominating Committee; correct?  
 25 A Once, yes.

S. Froman - by Defendant - Cross/Mr. Wang Page 3932

1 Q Nominating Committee members are elected by the board;  
 2 correct?  
 3 THE COURT: Do you want this exhibit to stay up?  
 4 MR. WANG: We can take this down.  
 5 A That's correct.  
 6 Q And for the election of Nominating Committee members,  
 7 you received a cheat sheet telling you who to vote for;  
 8 correct?  
 9 A I don't know what you mean by "cheat sheet."  
 10 MR. WANG: May I approach the witness with a  
 11 document, your Honor?  
 12 THE COURT: You can with the court officer.  
 13 (Handed to the witness)  
 14 MR. WANG: I have multiples of this one.  
 15 THE COURT: Thank you.  
 16 (Handed up to the Court)  
 17 Q This is a document that has been marked PX 6009 for  
 18 identification.  
 19 A I see it, Mr. Wang.  
 20 Q There's a telephone number at the top of this document.  
 21 Obviously, that number will be redacted before it is  
 22 shown publicly; but does that telephone number look familiar to  
 23 you?  
 24 A It is my telephone number.  
 25 Q And the number next to your telephone number, does that

S. Froman - by Defendant - Cross/Mr. Wang Page 3933

1 number look familiar to you?  
 2 A No, but it says Millie Hallow. I have no reason not to  
 3 believe that it is.  
 4 Q And you texted with Ms. Hallow on a regular basis  
 5 during your time on the NRA board; correct?  
 6 A I texted with Ms. Hallow many, many times during my  
 7 service on the NRA board.  
 8 Q About NRA matters; correct?  
 9 A Yes, and about her family.  
 10 MR. WANG: I move to admit PX 6009.  
 11 MS. ROGERS: No objection.  
 12 THE COURT: It is admitted.  
 13 (Whereupon, at this time Exhibit PX 6009 was  
 14 admitted and received into evidence.)  
 15 Q The cellphone numbers have been redacted on the screen.  
 16 (Displayed)  
 17 In April, on April 13, 2015, you sent a text message to  
 18 Ms. Hallow; correct?  
 19 A Apparently, yes.  
 20 Q And you said, "Millie, no one has given me a cheat  
 21 sheet --" your words -- "list for the Nominating Committee  
 22 election."  
 23 Do you recall that?  
 24 A I don't recall doing it, but I obviously did.  
 25 Q And Ms. Hallow responds to you with nine names,

NYAG v  
NRA

February 8, 2024

S. Froman - by Defendant - Cross/Mr. Wang Page 3934

1 correct?

2 A Yes.

3 Q And then you thanked her; correct?

4 A Yes.

5 Q And this all occurs the morning of April 13, 2015;

6 correct?

7 A Apparently, yes.

8 Q What did you mean when you said "cheat sheet?"

9 A A list of suggested names for election to the

10 Nominating Committee.

11 Q But you didn't use the language "suggestions" here;

12 correct?

13 A You're right. I used the words "cheat sheet."

14 Q Cheat sheet correct.

15 MR. WANG: Your Honor, may I hand the witness

16 another document?

17 (Handed to the witness)

18 MR. WANG: And for the Judge.

19 (Handed up to the Court)

20 MR. WANG: I'm handing the witness a document that

21 has been marked for identification. It was actually on

22 Mr. Phillip's list, WPX 51. This document in its entirety

23 is almost 300 pages. I've just excerpted the first 11 pages

24 and marked it WPX 51A.

25 MS. ROGERS: We have no objections so long as the

S. Froman - by Defendant - Cross/Mr. Wang Page 3935

1 version admitted ultimately is complete.

2 THE COURT: Well, you're seeking to admit just this

3 portion, yes?

4 MR. WANG: I have no objection to admitting the

5 entire set of minutes.

6 THE COURT: Okay, it sounds good. It is admitted.

7 (Whereupon, at this time Exhibit WPX 51 was

8 admitted and received into evidence.)

9 Q Ms. Froman, I'm going to direct your attention to WPX

10 51, page 4.

11 A All right, I'm here, Mr. Wang.

12 Q Do you know what these are?

13 A These are the minutes of the meeting of the board of

14 directors of the National Rifle Association for April of 2015.

15 Q And you were present on -- at this board meeting;

16 correct?

17 A Give me a minute to look. I don't remember, honestly,

18 it was --

19 Q Your a name appears five names down from the bottom of

20 the first column.

21 A Yes. I was present. I've only missed three meetings I

22 think the entire time on the board.

23 Q There was no question pending Ms. Froman.

24 I'm going to direct your attention to page 9, and the

25 third full paragraph of page 9.

S. Froman - by Defendant - Cross/Mr. Wang Page 3936

1 "The chair called for nominations for election to the

2 Nominating Committee."

3 Do you see that?

4 A Yes, I do.

5 Q And nine names were submitted to the Nominating

6 Committee; correct?

7 A Correct.

8 Q Those are the same nine names you received from

9 Ms. Hallow earlier that morning, correct?

10 A I believe so.

11 Q And let me direct your attention to page 11 of WPX 51A.

12 The bottom paragraph beginning with "returning to the

13 report of the Nominating Committee."

14 "Returning to the report of the Nominating

15 Committee, the chair announced that the following

16 individuals were elected to the 2015/2016 Nominating

17 Committee listed in order of the number of votes received."

18 The same nine names appear here and have been

19 elected by the board to the Nominating Committee; correct?

20 A Correct.

21 Q There's no record in these minutes of a robust debate,

22 correct?

23 A I have not looked at all of the minutes.

24 Q The minutes for the board meeting are in front of you.

25 Can you show me where there's a robust debate?

S. Froman - by Defendant - Cross/Mr. Wang Page 3937

1 MS. ROGERS: Objection. He put 7 pages from 300

2 pages in front of her.

3 THE COURT: She didn't say there wasn't anything in

4 the minutes. She just said she hadn't read them.

5 Q There are 11 pages here, and do you want to look

6 through them --

7 A Mr. Wang, I don't know what your question is.

8 Q My question is did a robust debate take place with

9 respect to these nine names?

10 A I don't remember. It was very frequent that we had

11 more than nine names up for election.

12 Q The meeting ended at the last line of this -- these

13 minutes indicate that the meeting ended at 2:17 p.m., April 13,

14 2015; right?

15 A Yes.

16 Q A few hours after you asked for the cheat sheet from

17 Ms. Hallow and she provided it to you; correct?

18 A Yes.

19 MR. WANG: Pass the witness.

20 MS. COUTU: Your Honor, a few questions, please?

21 THE COURT: Sure.

22 MR. CORRELL: Your Honor, we've gone out of order,

23 but I'm happy to let Ms. Coutu go and then I'll go after.

24 MS. COUTU: Can everyone hear me? Okay, great.

25

S. Froman - by Defendant - Cross/Mr. Coutu Page 3938

1 CROSS-EXAMINATION  
 2 BY MS. COUTU:  
 3 Q Good afternoon, Ms. Froman. My name is Lisa Coutu, and  
 4 I represent Woody Phillips in this action. Just a couple of  
 5 questions.  
 6 Earlier when you were testifying with Ms. Rogers, you  
 7 mentioned there were some questions regarding the NRA's finances  
 8 raised in the mid 1990s.  
 9 Do you recall that?  
 10 A Yes.  
 11 Q And those questions were raised by Mr. Knox?  
 12 A Yes.  
 13 Q And in order to answer those questions, you went to  
 14 the finance office of the NRA to get access information; right?  
 15 A I don't know that I actually physically went to the  
 16 finance office, but I certainly went to employees in the finance  
 17 office.  
 18 Q To employees in the finance office, and did those  
 19 employees from the finance office provide you access to records?  
 20 A Yes.  
 21 Q And were you able to then review those records?  
 22 A Yes.  
 23 Q And were there any records that you asked for from  
 24 those finance employees that you weren't provided?  
 25 A No.

S. Froman - by Defendant - Cross/Mr. Coutu Page 3939

1 Q Were you able to ask them questions regarding your --  
 2 the questions raise about the NRA finances?  
 3 A Yes.  
 4 Q Did they answer them?  
 5 A Yes.  
 6 Q And based upon what you reviewed and their answers that  
 7 they provided, you felt comfortable with the NRA's finances in  
 8 the mid 1990s; right?  
 9 A Yes.  
 10 Q And in the mid 1990s, Mr. Phillips was the CFO and  
 11 treasurer at the time; correct?  
 12 A Yes.  
 13 Q And the treasurer gets elected by the board of  
 14 directors every single year; right?  
 15 A That's correct.  
 16 Q And from 1992 until currently, you've been on the board  
 17 of directors; right?  
 18 A Yes.  
 19 Q So, from 1992 until Mr. Phillips retired in 2018, you  
 20 elected through the board Mr. Phillips as treasurer of the NRA;  
 21 right?  
 22 A That's right.  
 23 Q And, also, I believe you had mentioned that there was  
 24 a stock portfolio that increased and was really beneficial for  
 25 the NRA as well; right?

S. Froman - by Defendant - Cross/Mr. Coutu Page 3940

1 A Yes.  
 2 Q And Mr. Phillips, as the CFO and treasurer, was in  
 3 charge of that stock portfolio; right?  
 4 A I believe so.  
 5 Q Now, switching topics just very briefly. You also  
 6 mentioned that you had an arrangement with the NRA where you  
 7 would do speaking engagements.  
 8 Do you recall that testimony?  
 9 A Yes.  
 10 Q And I know that there was not a written contract, but  
 11 I think you also testified that you were constantly updating and  
 12 reporting to the board regarding what was happening with your  
 13 speaking engagements; right?  
 14 A I was reporting to NRA management what I was doing.  
 15 Q And then I think you also said that the money that you  
 16 were paid as a result of those speaking engagements showed up on  
 17 the Form 990s; right?  
 18 A Correct.  
 19 Q And that those Form 990s were available to the board of  
 20 directors?  
 21 A Yes.  
 22 Q Now, was your flat fee available to Mr. Cotton to see  
 23 when he reviewed the 990s?  
 24 A I believe so.  
 25 Q Now, even if there wasn't a written contract, do you

S. Froman - by Defendant - Cross/Mr. Coutu Page 3941

1 believe those speaking engagements benefitted the NRA?  
 2 A Yes.  
 3 Q How?  
 4 A I was speaking about the NRA's mission and objectives.  
 5 I was speaking about the constitution of the United States,  
 6 especially with respect to the 2nd Amendment. I was talking  
 7 about training law enforcement members of the military and  
 8 citizens of good character in the safe and responsible use of  
 9 firearms.  
 10 I was talking to people about the many programs that  
 11 the NRA had, including the competitions programs. I mean, it  
 12 covered the gamut. I was speaking to women groups about the  
 13 importance of women being able to, if they wanted to choose to  
 14 own a gun to choose to own a gun.  
 15 And all of these things were things that I felt were my  
 16 duty as director of the association to do outreach about; and if  
 17 the NRA was willing to help support -- pay my expenses to help  
 18 support that speaking and the NRA wanted me to continue to do  
 19 it, I was enthusiastic about doing it. I loved doing it.  
 20 Q And do you think your speaking engagements led to  
 21 additional members joining the NRA?  
 22 A I know they did. I signed some of them up myself.  
 23 Q Fantastic. And do you think that those speaking  
 24 engagements also increased possible donations to the NRA?  
 25 A I believe they did, yes.

NYAG v  
NRA

February 8, 2024

S. Froman - by Defendant - Cross/Mr. Correll Page 3942

1 MS. COUTU: I pass the witness. Thank you.  
 2 THE COURT: Mr. Correll.  
 3 CROSS-EXAMINATION  
 4 BY MR. CORRELL:  
 5 Q Ms. Froman, I'm Kent Correll. I represent Mr. Wayne  
 6 LaPierre. Nice to see you.  
 7 A Yes, hello.  
 8 Q In your mind is there a difference between a mistake  
 9 and misconduct?  
 10 A Yes, of course.  
 11 Q And if someone makes an innocent mistake, an honest  
 12 mistake do you view that as misconduct?  
 13 A No, not necessarily.  
 14 Q And mistakes can happen inadvertently; correct?  
 15 A Yes.  
 16 Q And mistakes can happen because you've been provided  
 17 with information that is either incomplete or inaccurate;  
 18 correct?  
 19 A Yes.  
 20 MR. WANG: Objection to the leading.  
 21 THE COURT: I think this is --  
 22 MR. CORRELL: It's cross.  
 23 THE COURT: Overruled.  
 24 Q For example, if you buy a car off a lease and you pay  
 25 the amount that you're asked to pay and you're unaware that the

S. Froman - by Defendant - Cross/Mr. Correll Page 3944

1 wardrobe if your employer has paid for that; if you're unaware  
 2 of that rule, does that fall within the box of misconduct or  
 3 mistake?  
 4 MR. WANG: Objection to the hypothetical.  
 5 THE COURT: Sustained.  
 6 MR. CORRELL: I'll ask it a different way.  
 7 Q If there's a rule that if you're employer pays for  
 8 wardrobe for you, you should reimburse the employer for that;  
 9 but you're not informed that your employer has paid for  
 10 wardrobe, does that fall within the category of mistake or  
 11 misconduct?  
 12 MR. WANG: Same objection.  
 13 THE COURT: Sustained, sustained. She's a fact  
 14 witness.  
 15 MR. CORRELL: I understand. I'll ask a fact  
 16 question.  
 17 Q As you sit here today, are you aware of the NRA having  
 18 paid for any wardrobe for Mr. LaPierre?  
 19 A I am not aware that NRA paid for any wardrobe for  
 20 Mr. LaPierre.  
 21 Q And are you aware of whether Mr. LaPierre has paid the  
 22 NRA for any wardrobe?  
 23 A I -- I am aware that Mr. LaPierre has paid a lot of  
 24 money to the NRA to compensate the NRA for expenses paid for by  
 25 the NRA that Mr. LaPierre had the benefit of.

S. Froman - by Defendant - Cross/Mr. Correll Page 3943

1 market has gone crazy for used cars, would that fall within the  
 2 category of misconduct for you or mistake?  
 3 A If you're unaware, that might be a mistake.  
 4 Q If you're unaware that there's a \$25 limit on gifts you  
 5 can give to employees and you submit an expense report with a  
 6 \$50 gift on it, unaware that there's a rule, is that misconduct  
 7 or a mistake?  
 8 A I think that would depend on what your obligations were  
 9 to inform yourself of the rules and whether or not you acted  
 10 diligently in informing yourself of what the rule was.  
 11 Q And if this is a rule that was generally unknown to  
 12 people within an organization, would that inform your decision  
 13 on that?  
 14 A Of course.  
 15 Q And if the organization has General Counsel, but  
 16 General Counsel hasn't informed you that there's such a rule;  
 17 then would that fall into the category of a mistake or  
 18 misconduct?  
 19 A Again, it would depend upon whether I have an  
 20 independent obligation to learn the rules myself separate and  
 21 apart from what General Counsel might tell me. It's hard to  
 22 answer the question in the abstract.  
 23 Q If -- if you're unaware that there's a rule that if you  
 24 are provided with wardrobe and you retain the wardrobe, that  
 25 wardrobe should be treated -- you should have to pay for that

Page 3945

1 Q And are you aware that Mr. LaPierre went all the way  
 2 back to the year 2000 looking for any indication of wardrobe  
 3 that he received that the NRA might have been paid for and wrote  
 4 a check for to cover that?  
 5 A I'm not aware of the specific dates. I am aware that  
 6 a significant sum of money was repaid by Mr. LaPierre for  
 7 expenses that the NRA has since deemed should have been personal  
 8 expenses of him and not paid for by the association.  
 9 (Continued on next page)  
 10  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

NYAG v  
NRA

February 8, 2024

Froman - by Defendant - Cross/Mr. Correll Page 3946

Page 3948

1 Q And that's gone back all the way to the year 2000 for  
2 that?  
3 A I don't know how far back it went.  
4 Q You eluded to a conversation you had with Mr. LaPierre  
5 where he said I don't care if -- in words or substance, I don't  
6 care if I lose every friend I've ever made, we are going to go  
7 down the principle path and look under every rock and find  
8 anything that needs to be fixing, and we are going to fix it, in  
9 words or substance; right?  
10 MR. WANG: Object to the mischaracterization of the  
11 testimony.  
12 Q Would you please tell me in your own words --  
13 THE COURT: Objection is overruled.  
14 Q You testified earlier about a conversation you had with  
15 Mr. LaPierre; correct?  
16 A Yes.  
17 Q Could you remind me of what, you know, the substance of  
18 that conversation was in terms of what he said about his  
19 commitment or his losing friends if he had to?  
20 A When the NRA Board of Directors and the Audit Committee  
21 was actively looking into allegations of mismanagement of NRA's  
22 financial affairs and allegations that our vendors had stolen  
23 from us, I remember Mr. LaPierre saying to me in a one on one  
24 conversation, if I lose every friend I've ever had, I will do  
25 what is right for the NRA and we will get to the bottom of this.

1 maybe starting at 9:15, maybe going till closer to one and  
2 closer to five. But aside from that, I don't have a lot of  
3 flexibility. So I would ask you to -- it's not what anybody  
4 asked for or wanted in terms of their hours, but that's my  
5 going in budgeting of it, and I would ask you to think about  
6 it and start thinking about whether you can hone your  
7 presentations down to that level. I will talk to you  
8 tomorrow.  
9 Yes, I will talk to you tomorrow.  
10 MR. CORRELL: Could we get a time check, please?  
11 Would you ask for a time check just to see --  
12 THE COURT: Well, why don't we -- I rather have it  
13 be up to date. So why don't we do a report on the time  
14 check at 3:00 tomorrow when we meet to talk about jury  
15 instructions.  
16 MR. CORRELL: Perfect.  
17 THE COURT: That will be in Room 208.  
18 (Whereupon at this time the trial was continued  
19 until February 9, 2024.)

Froman - by Defendant - Cross/Mr. Correll Page 3947

1 And he has done that.  
2 MR. CORRELL: Thank you very much, Ms. Froman. I  
3 appreciate it.  
4 THE COURT: Thank you. Can we release Ms. Froman?  
5 Any more questions?  
6 MS. ROGERS: No redirect. She is free to go.  
7 THE COURT: Thank you very much. You're free to go.  
8 THE WITNESS: Thank you, your Honor.  
9 THE COURT: All right, folks. We are done for the  
10 day. I will next see you on Tuesday. Monday is a court  
11 holiday. So thank you very much for your attention. Please  
12 remember your instructions, and I will see you bright and  
13 early on Tuesday.  
14 THE COURT OFFICER: All rise. Jury exiting.  
15 (Whereupon, at this time the jury exits  
16 the courtroom.)  
17 THE COURT: All right. The hours's late. I  
18 just -- something to think about. I still believe that it  
19 would be extremely helpful to have closing arguments  
20 together on the last day without impinging on the days for  
21 testimony which I have made pretty clear throughout. A  
22 rough and ready way that I have looked at to do that would  
23 be 45 minutes for each of the defendants and 60 for the  
24 Government. That adds up to four hours. I am open to  
25 looking at ways to squeeze a few more minutes out of the day

NYAG v  
NRA

February 8, 2024

	<b>abstract (1)</b> 3943:22	3829:4;3835:22; 3836:23;3837:5;	3781:21;3782:13; 3784:7,12;3785:15;	<b>advancement (1)</b> 3916:16
<b>\$</b>	<b>accept (2)</b> 3846:25;3885:8	3873:19;3895:1,22; 3896:9,11,14	3786:8;3800:22; 3802:18;3808:6;	<b>advancements (1)</b> 3828:9
<b>\$105,000 (1)</b> 3840:18	<b>accepted (7)</b> 3749:7;3756:7,16;	<b>accounting-wise (1)</b> 3835:22	3842:6;3845:23; 3850:14;3880:23;	<b>advantage (1)</b> 3884:10
<b>\$125,000 (1)</b> 3836:16	3780:4;3798:3,5; 3880:17	<b>accounts (7)</b> 3818:1,17,20,22;	3883:20;3896:11; 3898:17;3904:11;	<b>adversarial (1)</b> 3877:10
<b>\$25 (1)</b> 3943:4	<b>accepting (1)</b> 3805:19	3821:9;3873:20,20	3915:22;3924:20;	<b>adverse (1)</b> 3805:14
<b>\$25,000 (2)</b> 3836:20,21	<b>access (4)</b> 3913:16;3923:7;	<b>accumulated (1)</b> 3887:18	3926:3;3928:23; 3934:21;3938:15	<b>advice (2)</b> 3769:18;3903:7
<b>\$400 (1)</b> 3750:12	3938:14,19	<b>accuracy (3)</b> 3767:16;3809:11;	<b>ad (1)</b> 3868:22	<b>advised (4)</b> 3877:16;3879:14;
<b>\$400,000 (1)</b> 3781:11	<b>accommodating (1)</b> 3772:17	3830:1	<b>add (2)</b> 3829:4;3890:15	3888:22,25
<b>\$45,000 (1)</b> 3928:11	<b>accompanies (1)</b> 3768:4	<b>accurate (5)</b> 3749:5;3781:15;	<b>added (5)</b> 3761:14;3762:3;	<b>advising (1)</b> 3773:21
<b>\$50 (1)</b> 3943:6	<b>accompanying (1)</b> 3910:8	3782:23;3805:10; 3865:12	3799:3;3822:20;	<b>advisor (1)</b> 3880:24
<b>\$50,000 (2)</b> 3826:17;3840:23	<b>accordance (6)</b> 3741:3;3749:7;	<b>Ackerman (11)</b> 3826:8;3828:3;	3823:19	<b>advisory (2)</b> 3742:21;3791:13
<b>\$795 (1)</b> 3806:10	3780:4;3798:2;3896:2; 3917:16	3831:23;3832:14,17, 19;3833:3;3834:3,6;	<b>addition (9)</b> 3740:10;3741:5,16;	<b>advocacy (2)</b> 3748:16;3910:12
<b>*</b>	<b>according (2)</b> 3842:12;3855:1	3861:1;3875:1	3752:2;3776:20,23;	<b>advocate (2)</b> 3910:1;3914:21
<b>*** (1)</b> 3895:3	<b>account (3)</b> 3805:11;3839:23;	<b>Ackerman's (1)</b> 3874:24	3796:16	<b>affair (1)</b> 3894:11
<b>A</b>	3891:22	<b>Ac-Mac (1)</b> 3832:25	<b>additional (6)</b> 3774:7;3794:12;	<b>affairs (13)</b> 3882:14;3890:19;
<b>abbreviate (1)</b> 3772:13	<b>accountability (1)</b> 3828:11	<b>across (5)</b> 3777:2,4;3830:1;	3795:9;3803:11;	3891:14;3893:22,25;
<b>abide (1)</b> 3883:17	<b>accountable (1)</b> 3828:13	3836:20;3891:3	3824:13;3941:21	3894:1,5,8,9,19;
<b>abilities (1)</b> 3910:5	<b>accountant (24)</b> 3734:5;3739:11;	<b>act (2)</b> 3884:5;3926:16	<b>address (10)</b> 3752:1;3771:3;	3925:3,7;3946:22
<b>ability (7)</b> 3735:12;3787:23;	3742:11;3763:10;	<b>acted (1)</b> 3943:9	3778:20,22,25;	<b>affect (2)</b> 3888:13;3909:20
3839:7;3899:17;	3792:10,11;3793:15;	<b>action (13)</b> 3781:3;3784:16;	3781:14;3819:5;	<b>affected (1)</b> 3886:17
3903:12;3904:6;	3794:14;3795:18;	3800:5;3801:13;	3838:13,21;3861:16	<b>affiliated (1)</b> 3884:19
3909:20	3796:1,18,23;3798:6;	3807:4,8;3808:4;	<b>addressed (3)</b> 3764:20;3778:23;	<b>afraid (1)</b> 3913:15
<b>able (27)</b> 3737:20;3740:14,25;	3799:1,20,23;3800:12, 20;3803:22;3805:13;	3809:9;3885:2,6,9;	3861:19	<b>afternoon (17)</b> 3812:11,12,13;
3741:1,14,14;3744:4;	3807:1;3808:20,24;	3924:16;3938:4	3947:24	3844:2;3846:15;
3801:10;3803:7,9;	3913:14	<b>active (1)</b> 3901:8	<b>adhere (2)</b> 3772:6;3884:12	3848:25;3849:10;
3804:18;3816:5;	<b>Accountants (8)</b> 3740:17;3742:1;	<b>actively (1)</b> 3946:21	<b>adhering (1)</b> 3753:16	3853:14,15;3858:5,7;
3827:24,25;3829:3,3;	3749:18;3756:10;	<b>activism (3)</b> 3877:2,24;3878:22	<b>adjustments (2)</b> 3777:4;3832:24	3862:23;3875:21;
3848:23;3849:2;	3759:8;3791:4;3796:4;	<b>activist (4)</b> 3878:9,11,21;3911:8	<b>administrative (1)</b> 3768:2	3926:20;3927:3,4;
3866:11;3873:8;	3802:8	<b>activists (1)</b> 3911:13	<b>admissible (3)</b> 3820:22;3844:23;	3938:3
3910:14;3916:22,25;	<b>accounted (1)</b> 3835:18	<b>activities (6)</b> 3748:18;3814:7;	3845:19	<b>AG (8)</b> 3780:18;3810:20;
3917:3;3938:21;	<b>accounting (53)</b> 3739:8,10,25;	3887:11,12;3891:2,4	<b>admit (6)</b> 3782:16;3882:2;	3846:22;3847:14;
3939:1;3941:13	3740:13;3743:16,19;	<b>activity (2)</b> 3886:4;3918:7	3889:12;3931:3;	3848:1;3849:24;
<b>above (3)</b> 3798:1;3868:9;	3744:8;3747:24;	<b>actor (3)</b> 3908:5,9,20	3933:10;3935:2	3851:9,17
3896:4	3749:7,23;3750:2;	<b>Actors (1)</b> 3908:21	<b>admitted (14)</b> 3743:21;3793:7;	<b>again (35)</b> 3732:22;3740:2;
<b>absence (1)</b> 3880:13	3756:7,8,9,17;3758:18;	<b>activity (2)</b> 3886:4;3918:7	3820:23;3882:5,7;	3744:4;3745:7;
<b>absent (1)</b> 3889:5	3763:8,11;3777:7,8;	<b>actors (1)</b> 3908:21	3889:13,15;3931:5,7;	3754:11;3755:9,10,25;
<b>absolutely (4)</b> 3815:20;3882:20;	3780:4;3784:9,11,14;	<b>actual (2)</b> 3833:1,2	3933:12,14;3935:1,6,8	3761:5;3763:5;
3883:8;3888:6	3790:12,16,19,20;	<b>actually (25)</b> 3733:19;3758:22;	<b>admitting (2)</b> 3854:17;3935:4	3765:16;3767:20;
	3791:6,9,14;3793:5,21, 22;3794:18;3795:16;		<b>advance (3)</b> 3734:20;3848:14;	3770:25;3775:2;
	3798:6;3811:2,6;		3883:4	3777:24;3779:4;
	3813:1;3814:24;			3787:15,25;3797:15;
	3817:4;3818:21;			3799:13;3800:9;

NYAG v  
NRA

February 8, 2024

3802:16,23;3803:6; 3807:6;3810:11; 3820:13;3830:17; 3832:10;3851:9; 3854:7;3872:20; 3897:6;3922:12; 3943:19 <b>against (3)</b> 3764:10;3807:4; 3916:4 <b>ago (7)</b> 3809:15;3810:20; 3839:22;3870:2,2; 3892:15;3893:14 <b>agree (13)</b> 3736:9;3770:4; 3785:9;3795:22; 3808:8;3822:25; 3823:1,19;3853:16,19; 3854:7;3886:8; 3928:24 <b>agreed (3)</b> 3743:11;3822:21; 3840:7 <b>agreement (3)</b> 3793:1;3796:24; 3855:17 <b>agrees (1)</b> 3885:13 <b>AG's (3)</b> 3775:8;3849:6; 3851:23 <b>ahead (7)</b> 3744:17;3749:17; 3753:1;3762:20; 3799:11;3840:18,20 <b>AICPA (6)</b> 3741:9,24;3745:7,8; 3756:12,12 <b>airfare (1)</b> 3929:8 <b>akin (1)</b> 3896:16 <b>alert (2)</b> 3735:16;3786:12 <b>allegation (2)</b> 3802:1;3902:12 <b>allegations (5)</b> 3747:8;3807:2; 3809:12;3946:21,22 <b>alleged (1)</b> 3800:18 <b>Allegiance (1)</b> 3855:18 <b>allocation (1)</b> 3846:12 <b>allocations (1)</b> 3836:17 <b>allotments (1)</b> 3847:22 <b>allotted (1)</b> 3847:20 <b>allow (5)</b>	3770:19;3829:25; 3851:24;3909:2,15 <b>allowed (3)</b> 3749:25;3827:24; 3852:14 <b>allows (1)</b> 3829:23 <b>ally (3)</b> 3862:6,16,19 <b>almost (1)</b> 3934:23 <b>alone (1)</b> 3881:12 <b>along (4)</b> 3752:7;3829:17; 3878:5;3928:5 <b>alternative (1)</b> 3802:14 <b>although (1)</b> 3766:16 <b>always (15)</b> 3757:14;3764:4; 3765:11;3839:1,1; 3865:20;3866:7; 3874:9;3897:24; 3898:12,14;3900:5; 3902:4;3910:7,7 <b>Alzheimer's (1)</b> 3909:19 <b>amend (1)</b> 3885:14 <b>amended (5)</b> 3744:20,20;3747:10; 3887:20;3909:15 <b>Amendment (3)</b> 3916:17,18;3941:6 <b>America (3)</b> 3798:3;3879:24; 3915:23 <b>American (3)</b> 3740:16;3742:1; 3756:10 <b>Amish (3)</b> 3738:18,25;3739:6 <b>A-M-I-S-H (1)</b> 3738:25 <b>among (3)</b> 3732:1;3774:24; 3780:5 <b>amongst (1)</b> 3834:10 <b>amount (10)</b> 3770:2;3785:25; 3802:3,6;3880:3; 3928:16,18,22;3929:1; 3942:25 <b>amounts (1)</b> 3799:2 <b>analysis (23)</b> 3753:21,25;3755:6, 15;3761:9,22;3762:13; 3763:13;3790:23; 3793:11;3797:16;	3798:8,9;3800:7,25; 3801:24;3802:6,23; 3803:17;3809:7; 3813:16;3837:3; 3863:16 <b>analytics (1)</b> 3817:4 <b>analyze (2)</b> 3755:24;3771:12 <b>analyzed (2)</b> 3755:25;3809:20 <b>Analyzing (4)</b> 3732:20;3753:22; 3755:3;3777:21 <b>Angeles (2)</b> 3879:7;3881:12 <b>announce (1)</b> 3896:12 <b>announced (2)</b> 3909:19;3936:15 <b>announces (1)</b> 3896:15 <b>annual (17)</b> 3746:21;3751:15; 3768:8;3873:18; 3889:2;3896:6,16,22, 23;3897:2,6;3898:8,12, 14,18;3906:20,22 <b>anonymity (2)</b> 3761:14;3762:3 <b>anonymous (2)</b> 3762:22;3763:7 <b>anonymously (2)</b> 3761:16;3762:11 <b>answered (5)</b> 3759:4;3770:13,14; 3831:25;3870:22 <b>anti-retaliation (4)</b> 3764:9,23;3765:2,3 <b>anymore (1)</b> 3799:14 <b>AP (5)</b> 3838:4,8,11; 3839:13;3840:13 <b>apart (1)</b> 3943:21 <b>Apes (1)</b> 3908:8 <b>apologize (3)</b> 3732:15;3803:1; 3868:13 <b>apparent (1)</b> 3912:9 <b>Apparently (2)</b> 3933:19;3934:7 <b>appeals (1)</b> 3893:13 <b>appear (3)</b> 3732:18;3754:17; 3936:18 <b>appearance (4)</b> 3745:8,15,21;3910:5 <b>appeared (2)</b>	3755:1;3820:9 <b>appearing (1)</b> 3906:4 <b>appears (2)</b> 3857:2;3935:19 <b>applicants (1)</b> 3892:8 <b>applied (3)</b> 3733:21;3758:18; 3877:14 <b>applies (1)</b> 3745:6 <b>apply (4)</b> 3781:17;3784:7; 3850:10;3897:11 <b>applying (6)</b> 3733:21,23;3741:23; 3784:12;3785:1,7 <b>appointed (2)</b> 3890:6,14 <b>appreciate (2)</b> 3737:24;3947:3 <b>approach (2)</b> 3813:5;3932:10 <b>approached (2)</b> 3911:1,8 <b>appropriate (7)</b> 3735:2;3757:10; 3785:18;3820:14,18; 3829:16;3922:15 <b>appropriately (3)</b> 3732:18;3769:23; 3835:18 <b>approval (11)</b> 3760:6;3820:10; 3829:16,17;3832:13; 3834:10,11;3838:23; 3839:8;3840:1; 3841:13 <b>approvals (4)</b> 3826:20;3865:15,17, 20 <b>approve (9)</b> 3826:16;3832:12; 3837:11;3839:25,25; 3840:2,3,13,20 <b>approved (12)</b> 3754:17;3815:18; 3829:18;3832:5,6,7,23; 3836:18;3838:2; 3840:12;3841:18; 3917:16 <b>approving (2)</b> 3826:20;3837:23 <b>approximately (6)</b> 3781:10;3813:12; 3846:23;3854:5; 3906:12;3928:11 <b>April (8)</b> 3854:5;3855:2; 3896:7;3933:17,17; 3934:5;3935:14; 3937:13	<b>Aprio (1)</b> 3743:3 <b>archery (1)</b> 3890:13 <b>area (9)</b> 3751:12;3756:6; 3777:21;3828:10,12; 3875:25;3876:8; 3879:17;3880:16 <b>areas (7)</b> 3746:5;3747:18; 3756:4;3760:17; 3787:15;3879:15; 3890:2 <b>arguing (1)</b> 3851:19 <b>argument (2)</b> 3851:18;3913:17 <b>arguments (1)</b> 3947:19 <b>Arizona (4)</b> 3896:25;3911:2,9; 3915:24 <b>arm (1)</b> 3924:16 <b>arm's (1)</b> 3755:9 <b>arms-length (1)</b> 3754:18 <b>Aronson (32)</b> 3730:10,13,13,15,15, 21,24;3731:4,23,25; 3732:6,8,19,23; 3733:21;3734:9; 3743:3;3757:8; 3769:18;3773:4,8,17; 3776:8;3778:9;3785:5; 3788:16;3799:13; 3803:3,6,8,18;3804:24 <b>Aronson's (5)</b> 3731:19;3747:16; 3773:12,15;3777:14 <b>around (16)</b> 3797:21;3813:14,19; 3816:4,14;3826:15; 3832:5;3866:10; 3867:18;3868:15; 3873:1;3896:5,23; 3915:15;3918:19; 3921:18 <b>arrangement (4)</b> 3916:14;3917:12,15; 3940:6 <b>arrangements (3)</b> 3809:8,19,25 <b>arrival (1)</b> 3815:2 <b>arrive (2)</b> 3816:8;3923:24 <b>arriving (2)</b> 3795:4,9 <b>articulate (1)</b> 3910:18
--	--	---	--	--

NYAG v  
NRA

February 8, 2024

<b>aside (1)</b> 3948:2	<b>attendance (1)</b> 3878:18	<b>auditing (9)</b> 3731:21;3743:19; 3787:11;3792:8,8; 3795:16;3798:2; 3803:10,20	<b>B</b>	3743:9;3763:4; 3766:13;3767:17; 3769:11;3773:13; 3775:2;3805:3,8,12; 3926:1,9;3939:6
<b>aspects (3)</b> 3803:3;3864:16; 3891:25	<b>attended (3)</b> 3783:7;3815:25; 3889:6	<b>auditor (36)</b> 3731:11,20;3732:7; 3733:4,8,9;3734:4; 3744:5;3749:11; 3756:5;3765:25; 3767:19;3769:8,17; 3777:11;3779:16,21; 3780:1,2,8,9;3786:11; 3787:4,8,10;3788:7,16; 3791:25,25;3792:1,7; 3804:1;3808:15,21,23, 23	<b>baby (1)</b> 3879:20	<b>bases (1)</b> 3787:17
<b>assess (2)</b> 3787:18;3800:4	<b>attends (1)</b> 3897:20	<b>auditors (25)</b> 3741:14;3745:2; 3749:3;3754:8,8; 3756:11,13,18,20,22; 3759:8;3763:16; 3771:14;3776:22; 3777:16;3778:13,17, 18;3779:1;3783:2; 3795:18,20;3797:17, 19;3798:4	<b>Bachelors (2)</b> 3739:9;3790:16	<b>basically (3)</b> 3734:8;3777:9; 3849:23
<b>assessed (1)</b> 3795:11	<b>attention (12)</b> 3784:22;3820:4; 3831:2,13;3858:8; 3859:3;3908:19; 3910:3;3935:9,24; 3936:11;3947:11	<b>auditor's (3)</b> 3732:21;3763:15; 3777:1	<b>back (34)</b> 3735:4;3738:15; 3747:5;3750:23; 3767:24;3768:16; 3770:4;3802:16; 3810:19;3811:24; 3812:17;3827:2; 3830:25;3840:13; 3844:9,16;3847:25; 3853:5,8;3861:13; 3872:24;3876:3,6; 3877:19;3878:8; 3900:6;3901:14; 3905:6;3906:23; 3915:8;3923:16; 3945:2;3946:1,3	<b>basing (2)</b> 3747:1;3766:5
<b>assessing (2)</b> 3763:15;3798:8	<b>attentive (2)</b> 3926:14,15	<b>audits (19)</b> 3731:2;3733:2; 3740:14,20,22;3741:2; 3742:18;3751:8; 3763:21;3775:3; 3791:24;3792:3,16,17, 18,19;3798:4;3803:9; 3808:25	<b>backwards (1)</b> 3797:25	<b>basis (24)</b> 3731:23;3734:16; 3746:21;3751:2,15; 3753:15;3760:14; 3763:7;3766:5,8; 3767:17;3768:8; 3769:23;3776:5; 3803:7;3805:3,5; 3807:18;3837:4; 3866:10;3881:2; 3889:2;3914:14; 3933:4
<b>assessment (5)</b> 3746:10;3755:8; 3790:24;3801:6; 3804:15	<b>attorney (19)</b> 3753:24;3768:7; 3772:9;3796:12; 3807:4,24;3809:8,15, 16;3810:18;3842:15; 3844:7;3848:5;3911:2, 4;3922:1,17;3927:5,6	<b>authorities (1)</b> 3746:8	<b>background (3)</b> 3790:15;3793:14; 3875:23	<b>bathroom (2)</b> 3879:1;3880:5
<b>assets (11)</b> 3785:22;3800:18,22; 3802:2;3822:12; 3860:13,16,19;3913:1, 20;3914:6	<b>attorney-client (1)</b> 3894:15	<b>authorized (3)</b> 3819:13;3820:5,7	<b>backing (1)</b> 3757:13	<b>bathrooms (2)</b> 3878:3,25
<b>assignment (1)</b> 3899:10	<b>audience (1)</b> 3918:11	<b>available (14)</b> 3738:17;3867:13; 3887:23;3888:8,10,11; 3891:3,4,9;3896:6; 3929:17,19;3940:19,22	<b>backing (1)</b> 3797:25	<b>Bay (3)</b> 3875:25;3876:8; 3880:16
<b>assignments (1)</b> 3877:4	<b>audit (126)</b> 3731:1;3733:6,25; 3734:3,11,18;3742:13, 16,20;3744:8;3745:11, 12,14;3746:8,17; 3747:21,22;3749:4; 3751:6,21;3755:19,25; 3756:11,13;3758:15; 3760:7;3761:6;3763:5, 16,17;3764:13,16,19, 21;3765:5,11;3766:20; 3767:3,9;3768:24; 3770:21;3771:10,12, 15,16,20,20,22,23,25, 25;3772:7,23;3773:6, 16,18,22;3774:2,3,6,8, 18;3775:15;3777:1,3,4, 9,10,14,15;3778:2,4, 11,15;3779:19; 3780:11;3782:25; 3783:5,7,9,17;3787:23; 3788:10,12;3791:9,16, 21;3792:10,12,12,13, 14,15,16;3794:25; 3795:1;3797:10,10,18, 20,21,22,24;3804:9,16; 3809:2,4;3817:10,18, 19;3818:11;3819:1; 3820:3;3821:7;3824:1, 2,6;3827:3;3831:6,16; 3855:11;3859:4; 3863:2;3864:21; 3866:24;3946:20	<b>authorities (1)</b> 3746:8	<b>backing (1)</b> 3757:13	<b>bear (2)</b> 3763:12;3845:15
<b>assets (11)</b> 3785:22;3800:18,22; 3802:2;3822:12; 3860:13,16,19;3913:1, 20;3914:6	<b>audited (6)</b> 3753:3;3756:21; 3762:5;3768:3; 3774:21;3793:2	<b>avoid (1)</b> 3735:21	<b>backing (1)</b> 3797:25	<b>beat (1)</b> 3877:7
<b>assignment (1)</b> 3899:10		<b>aware (13)</b> 3743:12,14;3763:18; 3796:12;3806:23; 3849:6;3944:17,19,21, 23;3945:1,5,5	<b>backing (1)</b> 3797:25	<b>became (11)</b> 3791:8;3813:22,24; 3866:20;3899:12; 3908:13;3910:1,21; 3912:9;3924:18,20
<b>assignments (1)</b> 3877:4		<b>away (2)</b> 3881:17;3890:12	<b>backing (1)</b> 3797:25	<b>become (7)</b> 3877:1;3881:11; 3891:9;3906:11; 3912:9,11;3915:16
<b>assistant (2)</b> 3880:18;3927:5		<b>awhile (2)</b> 3762:19,20	<b>backing (1)</b> 3797:25	<b>before-and-after (1)</b> 3845:12
<b>associated (7)</b> 3804:5,6;3819:2; 3820:2;3822:10; 3828:2;3836:2			<b>balancing (1)</b> 3738:3	<b>began (5)</b> 3780:18;3790:18,22; 3791:2;3825:4
<b>association (20)</b> 3814:7;3818:18; 3828:14;3829:14; 3864:16;3882:14; 3884:5;3887:9,10; 3891:20;3894:4,9; 3901:13;3918:14; 3919:4,7;3921:1; 3935:14;3941:16; 3945:8			<b>balancing (1)</b> 3738:3	<b>begin (4)</b> 3762:10;3797:20,20; 3855:6
<b>Associations (2)</b> 3829:22;3915:9			<b>ballot (10)</b> 3892:9;3896:4; 3897:13,14;3902:7,8, 17,20;3905:13,19	<b>beginning (5)</b> 3756:20;3806:10; 3848:15;3909:20; 3936:12
<b>Association's (2)</b> 3818:19;3913:20			<b>ballots (5)</b> 3895:1,4;3896:1,8, 12	<b>behalf (9)</b> 3738:21;3789:20; 3812:2;3875:14; 3906:4;3910:19,20; 3911:19;3914:25
<b>assume (3)</b> 3766:14;3806:21; 3840:2			<b>banking (1)</b> 3879:13	<b>Behavioral (1)</b> 3818:17
<b>assuming (3)</b> 3772:18;3807:18; 3851:12			<b>bankrupt (2)</b> 3912:15,25	
<b>assumption (1)</b> 3847:21			<b>bankruptcies (4)</b> 3879:19;3920:11,12, 13	
<b>ATI (2)</b> 3819:2;3826:9			<b>bankruptcy (11)</b> 3790:25;3879:14,24, 24;3920:1,3,6,17,25; 3922:20;3923:21	
<b>atmosphere (1)</b> 3919:2			<b>base (2)</b> 3766:2,2	
<b>attempt (1)</b> 3795:23			<b>based (16)</b> 3732:18;3741:12,15;	
<b>attempted (1)</b> 3910:24				
<b>attend (3)</b> 3815:11;3897:22; 3898:16				

NYAG v  
NRA

February 8, 2024

<p><b>behind (1)</b> 3837:10</p> <p><b>behoove (1)</b> 3731:18</p> <p><b>belabor (1)</b> 3844:13</p> <p><b>belief (2)</b> 3822:2;3826:1</p> <p><b>belong (3)</b> 3756:24;3779:14; 3828:6</p> <p><b>belongs (3)</b> 3756:19,22;3838:22</p> <p><b>below (2)</b> 3785:18,25</p> <p><b>belt (1)</b> 3738:10</p> <p><b>beneficial (1)</b> 3939:24</p> <p><b>benefit (4)</b> 3828:14;3884:11; 3914:10;3944:25</p> <p><b>benefits (2)</b> 3777:23;3836:3</p> <p><b>benefitted (2)</b> 3914:11;3941:1</p> <p><b>Ben-Hur (1)</b> 3908:6</p> <p><b>best (21)</b> 3736:4,25;3737:22, 23;3778:25;3785:10; 3795:7;3823:15; 3859:22;3860:1; 3884:5,6,6;3886:10; 3899:17;3900:15; 3903:11;3904:6; 3912:13;3923:12; 3926:16</p> <p><b>better (5)</b> 3757:25;3880:9; 3897:3;3903:12; 3913:23</p> <p><b>beyond (4)</b> 3776:13,20;3851:5; 3891:5</p> <p><b>bias (1)</b> 3928:4</p> <p><b>bid (1)</b> 3846:25</p> <p><b>Big (12)</b> 3739:17;3740:2; 3790:19,20;3799:20; 3815:23;3816:13; 3829:9;3879:9; 3893:11;3918:10; 3920:11</p> <p><b>bigger (1)</b> 3891:21</p> <p><b>billed (8)</b> 3781:8,10,10; 3792:23;3806:14,15, 18,21</p> <p><b>billing (2)</b></p>	<p>3806:17;3921:23</p> <p><b>billion (1)</b> 3754:6</p> <p><b>binder (6)</b> 3856:5,6;3858:20, 23;3881:24;3889:7</p> <p><b>bio (3)</b> 3902:19,19,20</p> <p><b>bit (20)</b> 3741:22;3753:1; 3755:6;3757:13; 3783:14;3786:4; 3794:21;3807:6; 3810:15;3813:13; 3824:23;3831:19; 3834:15;3851:15,18; 3874:22;3875:22; 3889:24;3896:10; 3904:13</p> <p><b>black (6)</b> 3801:20,23;3808:21; 3890:3,7,8</p> <p><b>Blacker (13)</b> 3730:18;3731:14,15; 3789:17,23;3790:2,6; 3793:4;3803:14; 3806:6,23;3808:5; 3810:22</p> <p><b>B-L-A-C-K-E-R (1)</b> 3789:23</p> <p><b>Blacker's (1)</b> 3808:9</p> <p><b>blank (1)</b> 3851:14</p> <p><b>blind (1)</b> 3733:9</p> <p><b>block (1)</b> 3851:12</p> <p><b>blowers (1)</b> 3746:7</p> <p><b>blowing (1)</b> 3782:10</p> <p><b>Board (162)</b> 3741:16;3744:2,6,7, 9,10,11;3746:21; 3749:20;3751:14,17; 3752:8;3753:10,12; 3756:8;3757:6; 3758:21;3759:13,17; 3771:15,16,21;3824:9; 3830:19;3832:13,23; 3864:19;3881:8; 3882:13,19,21;3883:4, 9,12,16,18,23;3884:1, 4,9,12,14,15,15,16; 3885:3,5,7,12,21,22; 3886:5,9,14,19,20,20; 3887:2,3,8,10,18; 3888:3,5,15,20,22,24; 3889:5;3892:7,11,14, 21;3894:22,23,24; 3895:15;3897:9,12,15, 20,21,22,22,23;3898:1,</p>	<p>3,4,5;3899:4,13,14,20; 3900:10,17,18,19,22; 3901:3,5;3902:2,13,14, 16,18,22,25;3903:1,1, 8;3904:1,8;3905:11, 21;3906:12;3909:6,8, 12,14,18;3910:10,22; 3911:6,11,14,16,22,23, 24;3912:3,10,18,20; 3914:1;3915:6; 3917:21,21,24;3919:5; 3920:8,14;3924:17,22; 3928:6;3929:18; 3930:8,25;3931:1; 3932:1;3933:5,7; 3935:13,15,22; 3936:19,24;3939:13, 16,20;3940:12,19; 3946:20</p> <p><b>Boards (3)</b> 3743:23;3744:1; 3884:18</p> <p><b>board's (1)</b> 3887:14</p> <p><b>Bob (1)</b> 3911:1</p> <p><b>body (5)</b> 3756:8;3883:13; 3887:22;3894:10,10</p> <p><b>book (1)</b> 3888:1</p> <p><b>booked (1)</b> 3777:5</p> <p><b>books (1)</b> 3818:19</p> <p><b>born (1)</b> 3875:24</p> <p><b>boss (2)</b> 3887:8;3905:24</p> <p><b>Boston (2)</b> 3877:21;3878:14</p> <p><b>both (12)</b> 3732:22;3761:9,22; 3764:24;3795:13; 3813:24;3886:14; 3911:21;3916:1,4; 3924:21,21</p> <p><b>bother (1)</b> 3858:19</p> <p><b>bothered (1)</b> 3869:8</p> <p><b>bottle (1)</b> 3813:5</p> <p><b>bottom (5)</b> 3923:18;3931:12; 3935:19;3936:12; 3946:25</p> <p><b>bound (1)</b> 3745:7</p> <p><b>box (4)</b> 3829:14;3838:4,8; 3944:2</p> <p><b>brave (1)</b></p>	<p>3923:13</p> <p><b>breadth (3)</b> 3747:17;3748:9; 3775:4</p> <p><b>break (10)</b> 3741:22;3788:22,25; 3842:20,25;3853:21; 3881:14;3904:10,12,14</p> <p><b>break-in (1)</b> 3910:24</p> <p><b>breaks (1)</b> 3846:21</p> <p><b>Brewer (6)</b> 3871:6,10,11,15; 3872:14;3921:21</p> <p><b>brief (2)</b> 3924:4;3925:7</p> <p><b>briefings (1)</b> 3925:9</p> <p><b>briefly (6)</b> 3745:25;3759:6; 3788:4;3790:4,14; 3940:5</p> <p><b>Brigham (1)</b> 3790:17</p> <p><b>bright (1)</b> 3947:12</p> <p><b>bring (9)</b> 3764:10;3817:17,17; 3829:24;3855:25; 3858:11;3866:7,11; 3885:2</p> <p><b>bringing (2)</b> 3802:16;3858:20</p> <p><b>broad (2)</b> 3845:13;3865:2</p> <p><b>Bronx (1)</b> 3876:1</p> <p><b>brought (13)</b> 3763:12;3764:15; 3775:8;3819:6;3820:3; 3824:14,15;3825:7; 3828:4;3872:20; 3908:19,20,23</p> <p><b>Bruce (4)</b> 3789:17,23;3790:6; 3808:9</p> <p><b>bucket (1)</b> 3801:15</p> <p><b>buckets (1)</b> 3836:16</p> <p><b>budget (28)</b> 3813:16;3814:15; 3817:3;3832:4,7,7,9, 15,17,17,18,18,19,20, 23;3833:1,2,3;3834:3, 10,11;3863:16; 3866:14;3868:24; 3873:18,18;3874:24; 3891:23</p> <p><b>budgeting (8)</b> 3813:2;3814:24; 3831:19,22,22;3832:3;</p>	<p>3874:23;3948:5</p> <p><b>budget's (1)</b> 3833:4</p> <p><b>building (4)</b> 3852:7;3921:14,15, 18</p> <p><b>built-in (1)</b> 3771:5</p> <p><b>bullet (1)</b> 3732:16</p> <p><b>bunch (3)</b> 3732:19;3768:1; 3799:3</p> <p><b>bureau (2)</b> 3768:8;3873:22</p> <p><b>business (14)</b> 3745:10;3791:1; 3801:20,20;3804:7; 3805:23;3811:17; 3827:24;3844:23; 3845:1;3875:1; 3879:15;3886:25; 3906:9</p> <p><b>busy (2)</b> 3903:2,2</p> <p><b>buy (2)</b> 3881:22;3942:24</p> <p><b>Bylaws (12)</b> 3747:19;3881:25; 3882:1,8,25;3893:11; 3896:2;3899:5; 3905:15;3909:2,4,15</p> <hr/> <p style="text-align: center;"><b>C</b></p> <hr/> <p><b>c3 (12)</b> 3748:17;3835:9,10, 15,17,22;3836:6,7,10, 25;3837:7;3860:24</p> <p><b>c4 (1)</b> 3748:15</p> <p><b>calculate (1)</b> 3749:18</p> <p><b>calculated (1)</b> 3846:13</p> <p><b>California (3)</b> 3876:4;3877:21; 3880:24</p> <p><b>call (6)</b> 3730:18;3759:20; 3827:15;3847:18; 3879:21;3898:14</p> <p><b>called (23)</b> 3735:9;3738:21; 3739:16;3740:4,15; 3741:24;3748:1,15,21; 3749:12;3759:24; 3767:25,25;3789:19; 3812:2;3838:4,8; 3875:13;3879:7; 3881:18;3902:22; 3921:20;3936:1</p> <p><b>Calling (1)</b></p>
---	---	---	---	---

NYAG v  
NRA

February 8, 2024

<p>3920:5 <b>calls (6)</b> 3738:18;3789:17; 3811:19;3875:12; 3902:21;3913:25 <b>came (25)</b> 3735:3;3765:7; 3777:2,4;3794:1; 3823:1;3824:6;3825:1; 3866:9;3874:4;3876:2, 5;3878:18;3879:16; 3881:18;3887:17; 3902:18;3906:12; 3907:25;3908:10,13; 3920:21;3923:24; 3924:17;3925:24 <b>cameras (1)</b> 3819:11 <b>can (133)</b> 3731:1,4,5,5;3733:3; 3734:3;3735:5,17; 3736:4,25;3737:13,16, 23;3738:1;3739:20; 3741:20,22;3742:14; 3745:5,12,13,25; 3748:4,10;3749:9; 3750:3,5,25;3751:9; 3754:5,14;3755:6; 3757:14,14;3758:6; 3759:25;3760:12,13, 16,23,25;3761:15, 3762:11;3765:4; 3766:10,25;3770:20, 23;3771:2,11;3772:12, 13;3775:21;3778:16, 24;3780:3;3781:1; 3783:11;3785:20; 3786:22;3787:22; 3789:7;3790:11; 3792:4,22;3802:13; 3803:16;3805:11; 3807:7,17,21;3811:12; 3819:25;3820:24; 3823:25;3825:23; 3826:3;3829:16; 3830:17;3835:6,9; 3838:1,13,22;3848:11; 3849:7;3851:10; 3852:17;3854:10; 3857:7;3858:2,3,23; 3862:18;3872:22; 3875:22;3883:9,22; 3884:2;3885:10; 3888:12,18,25; 3889:23;3890:10,10, 11,15;3892:4;3893:8; 3895:24;3896:21; 3897:4,13,19,22; 3899:1;3900:16; 3905:15;3907:1; 3909:25;3912:6; 3913:12;3915:13; 3932:4,12;3936:25;</p>	<p>3937:24;3942:14,16; 3943:5;3947:4;3948:6 <b>candidate (2)</b> 3911:20,22 <b>capable (2)</b> 3899:15;3926:12 <b>capacities (2)</b> 3924:14,21 <b>capacity (4)</b> 3762:16;3863:18; 3883:3;3906:6 <b>caption (1)</b> 3850:10 <b>car (4)</b> 3738:3;3801:20,23; 3942:24 <b>card (1)</b> 3811:17 <b>care (5)</b> 3779:22;3806:17; 3923:17;3946:5,6 <b>career (13)</b> 3739:15,16,24; 3740:10;3741:16; 3753:4;3775:4; 3777:11;3800:20; 3877:9,11;3878:21; 3880:1 <b>careers (1)</b> 3880:12 <b>carried (2)</b> 3754:18;3815:19 <b>carries (1)</b> 3748:18 <b>carry (9)</b> 3744:11;3748:14,19; 3756:11,13;3771:22; 3883:17;3886:10; 3916:6 <b>carrying (4)</b> 3745:18,22;3754:22; 3767:7 <b>cars (1)</b> 3943:1 <b>case (33)</b> 3742:6;3744:12; 3751:25;3755:21,23; 3758:25;3764:14; 3769:6;3788:9; 3790:10;3793:16; 3794:14;3796:8; 3804:10,14;3806:8,23; 3807:2,11,23;3810:20; 3811:2;3823:5,23; 3844:17;3847:17; 3851:10,17,20;3852:4, 15;3869:14;3911:20 <b>cases (2)</b> 3838:20;3880:14 <b>catalyst (1)</b> 3873:8 <b>categories (1)</b> 3791:22</p>	<p><b>categorize (1)</b> 3827:12 <b>category (3)</b> 3943:2,17;3944:10 <b>cause (4)</b> 3734:24;3750:13; 3755:11;3767:22 <b>caused (4)</b> 3768:11;3820:1; 3834:1;3922:5 <b>causes (2)</b> 3755:11;3877:2 <b>caution (1)</b> 3792:14 <b>caveat (1)</b> 3736:18 <b>CCI (1)</b> 3815:21 <b>celebratory (1)</b> 3898:20 <b>cellphone (1)</b> 3933:15 <b>census (1)</b> 3873:22 <b>center (7)</b> 3835:23,23,25; 3836:1,11,12;3910:7 <b>centers (1)</b> 3835:23 <b>CEO (1)</b> 3907:12 <b>CEOs (3)</b> 3907:15,20,20 <b>CEO's (1)</b> 3907:13 <b>ceremonial (2)</b> 3906:1,3 <b>certain (11)</b> 3775:16;3785:18,25; 3809:25;3815:13,13; 3816:3;3817:8;3825:2; 3844:8,21 <b>certainly (29)</b> 3734:11;3742:17; 3745:7;3748:6;3750:6; 3751:3;3753:6,19; 3755:7,12;3759:3,19; 3760:1;3765:8;3767:5, 6,11,12;3771:4; 3774:9;3777:23; 3806:22;3821:1; 3844:25;3849:15; 3885:19;3904:17; 3906:3;3938:16 <b>Certified (7)</b> 3739:10;3740:16; 3742:1;3756:10; 3790:7;3793:15; 3895:1 <b>certifies (1)</b> 3896:14 <b>cetera (1)</b> 3837:2</p>	<p><b>CFO (7)</b> 3745:14;3769:15; 3774:14;3813:22; 3864:15;3939:10; 3940:2 <b>chair (7)</b> 3890:19,25;3894:5; 3899:6;3924:24; 3936:1,15 <b>chaired (2)</b> 3892:14;3931:23 <b>chairman (2)</b> 3885:5;3925:3 <b>Chairs (2)</b> 3910:17;3912:7 <b>Challenge (1)</b> 3835:13 <b>challenged (1)</b> 3886:13 <b>chamber's (1)</b> 3730:3 <b>chance (2)</b> 3886:12;3900:1 <b>change (10)</b> 3775:13;3827:9,19; 3828:22;3855:10; 3878:6;3880:12; 3884:21;3910:13; 3918:18 <b>changed (8)</b> 3750:17;3827:6; 3855:22;3874:10; 3886:25;3907:3; 3909:2;3925:21 <b>changes (13)</b> 3827:11,12,13,14,14, 15,16;3832:10,10; 3881:20;3888:21,22; 3923:4 <b>changing (1)</b> 3917:24 <b>CHAR500 (3)</b> 3767:25,25;3768:5 <b>character (1)</b> 3941:8 <b>characterization (4)</b> 3772:13;3797:7; 3799:5;3865:4 <b>characterize (2)</b> 3824:9;3895:17 <b>characterizing (1)</b> 3772:11 <b>charge (8)</b> 3735:8;3751:16; 3759:21;3792:22; 3899:18;3914:8; 3916:19;3940:3 <b>charged (2)</b> 3776:24;3806:10 <b>charging (1)</b> 3916:20 <b>charitable (6)</b> 3748:18;3785:22,24;</p>	<p>3834:24;3860:14,16 <b>Charities (1)</b> 3768:8 <b>Charlotte (1)</b> 3897:1 <b>Charlton (6)</b> 3908:2,3,4,7,10; 3910:1 <b>chart (1)</b> 3802:21 <b>charter (3)</b> 3771:24,24;3772:24 <b>cheat (7)</b> 3932:7,9;3933:20; 3934:8,13,14;3937:16 <b>check (5)</b> 3805:22;3945:4; 3948:10,11,14 <b>checking (1)</b> 3767:6 <b>checklist (1)</b> 3741:9 <b>checks (2)</b> 3771:5;3829:25 <b>chef (1)</b> 3878:14 <b>chief (1)</b> 3847:18 <b>child (2)</b> 3876:7;3878:13 <b>childhood (1)</b> 3876:9 <b>choose (3)</b> 3900:3;3941:13,14 <b>chooses (3)</b> 3899:4,5,6 <b>chose (1)</b> 3911:21 <b>chronologically (1)</b> 3842:9 <b>circulate (2)</b> 3746:19;3753:9 <b>circulated (2)</b> 3751:22;3911:19 <b>circulates (1)</b> 3758:21 <b>citing (1)</b> 3787:21 <b>citizens (1)</b> 3941:8 <b>city (1)</b> 3877:22 <b>civil (1)</b> 3880:22 <b>claim (2)</b> 3901:8,9 <b>claims (2)</b> 3761:15;3807:8 <b>Clara (2)</b> 3880:15,19 <b>clarifying (1)</b> 3906:24 <b>class (2)</b></p>
--	--	--	---	---

NYAG v  
NRA

February 8, 2024

<p>3878:2,8 <b>classes (3)</b> 3880:20;3891:4; 3916:2 <b>clause (5)</b> 3761:14,15;3762:4; 3764:23;3765:4 <b>clauses (2)</b> 3764:9;3765:10 <b>clean (9)</b> 3731:2;3732:4; 3733:2,6,25;3734:3; 3749:12;3779:21; 3780:1 <b>cleaned (1)</b> 3734:13 <b>clear (9)</b> 3733:17;3737:8; 3757:5;3791:17; 3803:9;3808:16; 3845:22;3873:5; 3947:21 <b>clearly (1)</b> 3789:10 <b>CLERK (11)</b> 3738:24;3739:2; 3789:22,24;3812:3,5,7, 9;3852:24;3875:16,18 <b>clicker (3)</b> 3739:4;3744:14; 3796:5 <b>client (15)</b> 3742:21;3743:1,2; 3745:11,12;3755:2; 3774:22;3778:21; 3800:25;3803:22; 3804:2;3805:13,16; 3845:25;3851:23 <b>clients (12)</b> 3742:20;3753:7,7,8, 13;3758:23;3790:8; 3805:17;3811:16; 3879:15;3880:24; 3916:20 <b>client's (1)</b> 3759:11 <b>clinic (1)</b> 3880:22 <b>clock (1)</b> 3848:4 <b>close (1)</b> 3864:13 <b>closer (3)</b> 3917:7;3948:1,2 <b>closing (8)</b> 3847:14;3849:8,9, 13;3850:15,25; 3852:18;3947:19 <b>closings (10)</b> 3846:10,14,20; 3847:24;3848:21; 3849:3,8;3851:25; 3852:11,12</p>	<p><b>Clubs (2)</b> 3915:8,18 <b>code (8)</b> 3834:20;3835:24,25; 3836:4,23;3839:20,21, 23 <b>cold (1)</b> 3876:3 <b>collated (1)</b> 3829:1 <b>colleague (3)</b> 3741:11;3793:13; 3806:12 <b>colleagues (9)</b> 3741:7;3814:16; 3817:9;3822:20; 3823:19;3831:5; 3867:24;3869:1; 3921:4 <b>collected (2)</b> 3895:5;3896:9 <b>collective (2)</b> 3883:13;3887:22 <b>Collectively (1)</b> 3758:9 <b>college (1)</b> 3876:10 <b>collegial (1)</b> 3771:18 <b>color (1)</b> 3737:19 <b>column (3)</b> 3836:12;3837:6; 3935:20 <b>combination (2)</b> 3734:23;3757:23 <b>combined (1)</b> 3735:10 <b>comfort (5)</b> 3764:1;3774:8; 3780:2,10;3798:7 <b>comfortable (3)</b> 3765:10;3773:7; 3939:7 <b>coming (11)</b> 3730:2;3747:7; 3762:23;3763:6; 3835:6,17;3836:25; 3866:11;3878:20; 3906:13;3925:16 <b>Commandments (1)</b> 3908:6 <b>comment (2)</b> 3735:5;3795:16 <b>commentary (1)</b> 3779:22 <b>comments (8)</b> 3735:10,15;3736:16; 3737:5;3778:17,18,23, 25 <b>commercial (1)</b> 3879:12 <b>commit (1)</b></p>	<p>3881:1 <b>commitment (11)</b> 3744:24;3774:19,23; 3777:22;3783:20,23; 3784:23;3785:13; 3787:5,19;3946:19 <b>committed (2)</b> 3787:12;3900:9 <b>Committee (153)</b> 3746:8;3747:21,22; 3756:1;3758:15; 3760:7;3761:6;3763:5; 3764:13,17,19;3765:5, 11;3766:20;3767:3,9; 3771:10,12,16,16,21, 22,23,25;3772:1,23; 3777:9,15;3778:11; 3782:25;3783:5,7,10, 17;3817:10,18,19,21; 3818:11;3819:1; 3821:8;3824:2,3,7; 3827:3;3831:6,16; 3832:7,8,11;3834:9; 3855:11;3859:5; 3863:2;3864:21,23; 3866:24;3884:25; 3885:2,5,9,17;3890:3, 3,7,19,22,23,24,25; 3891:1,11,12,13,24; 3892:1,5,6,8,11,13,15, 16,17,23;3893:14,18, 20,22,25;3894:2,2,5,7, 8,16,18,20,21;3895:2, 6,9,11,14,16;3897:23; 3898:1;3899:4,5,10,19, 19,22;3900:4,7,8,16, 17,22;3901:23,25; 3902:1,6;3903:15,21; 3905:7,9,10,12; 3906:19;3907:2,3; 3911:18,21,22; 3924:24;3925:1,3,7; 3931:20,21,24;3932:1, 6;3933:21;3934:10; 3936:2,6,13,15,17,19; 3946:20 <b>committees (18)</b> 3778:4;3884:17,18, 19;3885:14,20; 3889:21,24;3890:1,15, 17,18,18,20;3899:7,16; 3900:2;3906:7 <b>committee's (4)</b> 3751:21;3777:15; 3820:3;3834:11 <b>common (3)</b> 3731:7;3886:1; 3904:14 <b>communicate (4)</b> 3752:3;3759:20; 3775:16;3831:5 <b>communicated (2)</b> 3768:16;3831:16</p>	<p><b>communication (1)</b> 3776:24 <b>communications (3)</b> 3776:21;3777:12,14 <b>commute (2)</b> 3737:1;3738:2 <b>companies (5)</b> 3780:16;3792:23,25; 3795:23;3805:21 <b>companies' (1)</b> 3787:4 <b>company (8)</b> 3733:5;3754:6; 3755:3,19;3760:20; 3787:11;3793:8; 3802:9 <b>company's (1)</b> 3780:10 <b>compare (9)</b> 3753:4;3761:18; 3762:4;3773:5;3779:2; 3814:4;3816:1;3833:2; 3897:19 <b>compared (1)</b> 3778:16 <b>comparing (1)</b> 3762:15 <b>comparison (1)</b> 3907:12 <b>compel (1)</b> 3735:12 <b>compensate (1)</b> 3944:24 <b>compensated (5)</b> 3743:6,9,15,16; 3794:7 <b>compensation (9)</b> 3794:13;3907:1,2,3, 6,9,10,11,16 <b>competence (2)</b> 3779:22;3926:2 <b>competency (1)</b> 3780:5 <b>competition (1)</b> 3884:21 <b>competitions (5)</b> 3835:11;3885:15,16; 3890:8;3941:11 <b>competitors (1)</b> 3890:7 <b>compilations (1)</b> 3799:7 <b>complained (1)</b> 3892:25 <b>complaining (2)</b> 3912:12;3921:20 <b>complaint (11)</b> 3744:19,20,20; 3747:10;3809:8; 3892:20,21;3893:3,5,8; 3922:18 <b>complaints (4)</b> 3764:11;3892:17,18;</p>	<p>3893:2 <b>complete (7)</b> 3768:10,13;3771:7; 3782:23;3802:6; 3815:9;3935:1 <b>completed (1)</b> 3730:16 <b>completely (3)</b> 3762:18;3769:22; 3847:23 <b>completeness (2)</b> 3767:15;3769:17 <b>Completes (1)</b> 3829:21 <b>complexity (1)</b> 3825:9 <b>compliance (27)</b> 3744:24;3747:20; 3752:6;3761:1; 3792:13,17,18,25; 3793:3;3806:24; 3809:25;3816:8; 3827:15;3830:2,5,5,7, 13,14;3841:24;3842:5, 11;3874:16;3888:16, 20,21;3889:4 <b>complicated (1)</b> 3748:12 <b>complied (2)</b> 3809:20;3810:9 <b>complies (3)</b> 3772:5;3773:25,25 <b>complimented (1)</b> 3931:8 <b>comply (2)</b> 3827:5;3888:5 <b>complying (1)</b> 3740:21 <b>component (1)</b> 3829:4 <b>composed (1)</b> 3861:8 <b>comprising (1)</b> 3887:14 <b>computer (1)</b> 3822:12 <b>concealed (2)</b> 3815:18;3916:5 <b>concealing (1)</b> 3770:10 <b>concept (3)</b> 3748:1,2;3749:2 <b>concepts (2)</b> 3747:3;3749:15 <b>concern (11)</b> 3730:14;3755:11; 3765:14;3767:22; 3768:11;3815:24; 3820:3;3823:20; 3831:15;3832:2; 3847:16 <b>concerned (5)</b> 3800:12;3801:16,16;</p>
---	--	---	---	---

NYAG v  
NRA

February 8, 2024

3903:13;3922:15 <b>concerning (3)</b> 3766:23;3777:16; 3807:9 <b>concerns (48)</b> 3730:19;3759:19; 3766:22;3768:16; 3778:6,13;3797:4; 3806:23;3815:13,17; 3817:9,20;3818:2,3,4, 12;3819:2;3824:1,3,7; 3825:19;3826:7; 3831:5,21;3842:3,10; 3855:10,14,14,21,23; 3858:14,21,25;3859:4; 3860:11;3861:7,17,19; 3863:3;3865:14; 3866:6,16,25;3867:8; 3869:1,5;3921:8 <b>concise (1)</b> 3736:13 <b>concisely (1)</b> 3760:13 <b>conclude (2)</b> 3805:10;3921:13 <b>conclusion (8)</b> 3740:21;3746:10; 3750:9,14;3758:10; 3764:20;3780:5; 3782:4 <b>conclusions (6)</b> 3741:1,15;3743:12; 3747:8;3759:18; 3776:17 <b>concurred (1)</b> 3757:9 <b>conduct (2)</b> 3792:12;3796:2 <b>conducted (4)</b> 3767:12;3785:14; 3809:1,4 <b>confidential (2)</b> 3774:22;3893:15 <b>confidentiality (1)</b> 3765:19 <b>confines (1)</b> 3887:2 <b>confirm (2)</b> 3820:24;3821:24 <b>confirming (1)</b> 3732:22 <b>conflict (11)</b> 3746:12,14;3751:4, 23;3752:10,12;3753:4, 17,22;3781:25; 3805:22 <b>conflict-of-interest (13)</b> 3746:18,20;3747:13; 3751:7,13,21;3752:15; 3753:7,9,10;3756:2; 3758:11,25 <b>conflicts (4)</b> 3751:24;3752:1,13;	3781:14 <b>conform (2)</b> 3849:12;3882:18 <b>Congratulations (1)</b> 3873:12 <b>Congress (1)</b> 3884:17 <b>CONLEY (35)</b> 3730:8;3741:18; 3743:20;3749:21; 3755:13;3757:24; 3762:12;3765:22; 3769:20;3770:7; 3772:11;3773:10,23; 3776:12;3777:18; 3779:24;3780:23,25; 3786:2,18;3788:4,6; 3793:6;3797:6;3799:4, 15;3800:1,15;3803:13; 3804:11;3806:5; 3807:20;3808:1; 3810:13;3811:11 <b>connection (4)</b> 3817:15;3854:3; 3873:15;3874:24 <b>connotations (1)</b> 3872:21 <b>consider (6)</b> 3733:11;3763:10,12; 3766:8;3794:17; 3892:8 <b>considerations (1)</b> 3920:3 <b>considered (5)</b> 3732:1;3827:4; 3893:20;3902:2; 3912:23 <b>considering (1)</b> 3766:10 <b>consistent (1)</b> 3852:12 <b>consistently (1)</b> 3902:4 <b>consolidated (3)</b> 3748:20,21;3818:3 <b>consolidation (1)</b> 3790:20 <b>constant (2)</b> 3752:8;3753:14 <b>constantly (2)</b> 3918:9;3940:11 <b>constituents (1)</b> 3753:15 <b>constituted (1)</b> 3822:1 <b>constitutes (1)</b> 3822:3 <b>Constitution (2)</b> 3916:18;3941:5 <b>constraints (1)</b> 3849:17 <b>construction (1)</b> 3858:3	<b>consult (1)</b> 3784:11 <b>consultant (5)</b> 3792:11;3804:1,4; 3828:7;3927:16 <b>consultants (2)</b> 3774:15;3803:18 <b>consulted (3)</b> 3768:14;3784:9; 3888:8 <b>consulting (17)</b> 3747:23;3769:8,18; 3790:8,9;3791:7,7,10, 12,14,20;3792:6; 3794:19;3800:24; 3818:18,19;3826:10 <b>contact (1)</b> 3826:6 <b>contacts (1)</b> 3834:5 <b>contained (1)</b> 3887:18 <b>content (1)</b> 3733:3 <b>contentious (2)</b> 3886:6,18 <b>contesting (1)</b> 3782:1 <b>continue (7)</b> 3830:23;3858:2; 3905:4;3913:7; 3915:10;3916:16; 3941:18 <b>Continued (20)</b> 3752:17;3775:23; 3791:13;3798:10; 3801:14;3816:15; 3833:5;3843:8;3856:8; 3876:12;3898:25; 3904:25;3909:6,22,22; 3915:1;3919:8; 3926:24;3945:9; 3948:18 <b>continuing (4)</b> 3730:6;3827:19; 3874:7;3915:20 <b>continuous (2)</b> 3896:3;3897:3 <b>contract (16)</b> 3792:12,25;3801:4; 3821:15;3830:11; 3839:3;3841:11,11,12, 12;3917:9,16;3920:23; 3930:3;3940:10,25 <b>contracted (2)</b> 3838:25;3841:19 <b>contractor (2)</b> 3828:7,13 <b>contracts (4)</b> 3793:2,3;3917:19,20 <b>contrary (2)</b> 3892:19,22 <b>contributed (3)</b>	3821:19;3822:19; 3823:18 <b>control (12)</b> 3773:22;3774:6,16, 18;3787:18;3788:9; 3792:15;3794:17; 3800:14;3809:4; 3903:14;3923:9 <b>controls (30)</b> 3732:2,5;3733:3,8; 3744:23;3751:1; 3760:10;3772:1; 3773:17;3783:21,24; 3785:13,15;3793:18; 3795:12;3797:3; 3800:4;3810:5;3821:3; 3822:1,6,8,16;3823:2, 4,10;3831:3,9;3917:16, 18 <b>controversial (1)</b> 3805:14 <b>convention (1)</b> 3898:15 <b>conventions (1)</b> 3898:23 <b>conversation (5)</b> 3922:13;3946:4,14, 18,24 <b>conversations (3)</b> 3859:15;3930:24; 3931:1 <b>cook (2)</b> 3878:20,23 <b>cooking (1)</b> 3878:16 <b>cooperatively (1)</b> 3735:13 <b>Coopers (4)</b> 3790:22;3791:4,15, 18 <b>coordinated (2)</b> 3737:25;3769:14 <b>copies (1)</b> 3854:12 <b>copy (4)</b> 3746:18;3768:4; 3858:23,24 <b>Corbin (1)</b> 3911:1 <b>core (1)</b> 3734:8 <b>cornerstone (3)</b> 3746:15;3763:21,22 <b>cornerstones (1)</b> 3764:8 <b>corporate (19)</b> 3744:24;3747:14; 3760:24;3774:19,23; 3777:22;3783:20,24; 3784:23;3785:13; 3787:19;3806:24; 3807:9,23;3810:24; 3879:15;3896:17;	3922:9;3924:20 <b>Corporation (1)</b> 3879:23 <b>corporations (1)</b> 3860:24 <b>correcting (1)</b> 3795:24 <b>correction (1)</b> 3923:4 <b>corrective (2)</b> 3800:5;3801:12 <b>correctly (2)</b> 3749:8;3866:2 <b>CORRELL (40)</b> 3736:15,21;3737:5, 14;3738:4,9;3779:7; 3806:1;3837:15; 3847:2,16;3850:14,18, 23,25;3851:22;3858:1, 2,5,11,14,21;3859:2, 16,18;3862:10,12,20, 25;3924:2;3937:22; 3942:2,4,5,22;3944:6, 15;3947:2;3948:10,16 <b>corroborate (1)</b> 3817:20 <b>corruption (1)</b> 3805:15 <b>COSO (1)</b> 3787:16 <b>cost (7)</b> 3835:23,23,25; 3836:1,11,11;3917:2 <b>cost-center (1)</b> 3839:21 <b>Cotton (1)</b> 3940:22 <b>Counsel (29)</b> 3751:25;3761:7; 3764:14,16;3769:15, 16;3774:15;3789:16; 3807:7;3811:7; 3812:10;3843:2; 3856:3,4;3866:20; 3869:6;3894:13,14; 3904:9,16;3921:9; 3924:20;3925:2,6; 3926:5,7;3943:15,16, 21 <b>count (1)</b> 3896:13 <b>counted (2)</b> 3895:5;3896:10 <b>counties (1)</b> 3874:1 <b>counting (2)</b> 3895:1;3896:11 <b>country (8)</b> 3836:20;3879:25; 3891:3;3898:19; 3909:1;3915:7,16; 3916:18 <b>counts (1)</b>
---	---	---	--	---

NYAG v  
NRA

February 8, 2024

3836:7 <b>couple (15)</b> 3730:20;3732:9; 3734:5;3742:3,6; 3746:5;3762:7; 3768:19;3779:9,13; 3782:19;3796:22; 3817:24;3839:22; 3938:4 <b>course (13)</b> 3786:11;3787:3,7, 10;3813:22,24;3891:9; 3903:18;3915:23; 3920:15;3923:4; 3942:10;3943:14 <b>courses (4)</b> 3891:6,6,7,7 <b>COURT (201)</b> 3730:1;3731:22; 3732:3,10;3733:12,24; 3734:13;3735:16,17; 3736:2,4,11,18,25; 3737:8,16,21;3738:5, 12,15,20;3739:3,21; 3741:19;3743:21; 3746:23;3747:5; 3749:22;3750:2; 3755:18;3757:25; 3761:20,23;3762:17; 3763:2;3766:1; 3769:25;3770:8; 3772:12,15,18; 3773:11,24;3776:16; 3777:25;3779:6,25; 3780:22;3783:14; 3786:3,19,21;3788:3, 18,20,25;3789:2,6,10, 12,15,18;3793:7; 3795:4;3797:8;3799:6; 3800:2,17;3803:15; 3804:13,21;3805:25; 3806:3;3807:17; 3808:16;3810:14; 3811:5,10,12,20,22,23, 24;3812:4,10,12; 3813:6;3819:17,22; 3820:15,21;3822:5,24; 3825:17,23;3826:5; 3830:4;3835:3; 3837:14;3838:5; 3842:19,21,24;3844:4, 14,19,22;3845:4,11,25; 3846:3,9,19,20,25; 3847:4,6,8,11,21; 3848:13;3849:12,14, 15;3850:6,16,20,24; 3851:4,6;3852:2,9,24; 3853:2,5,10;3854:13, 17;3855:20,24;3856:3; 3857:8;3858:2,13,15, 22;3859:17;3862:9,11, 14,22;3864:3;3872:3; 3875:7,10;3880:23;	3881:3;3882:5;3884:1; 3889:13;3890:5; 3904:9,12,22;3905:2; 3914:1,3,15;3920:7; 3924:1;3926:19,22; 3927:25;3928:3,8; 3931:5;3932:3,12,12, 15,16;3933:12; 3934:19;3935:2,6; 3937:3,21;3942:2,21, 23;3944:5,13;3946:13; 3947:4,7,9,10,14,17; 3948:12,17 <b>courtroom (9)</b> 3738:14;3789:4,14; 3794:2;3842:23; 3853:4;3904:19,24; 3947:16 <b>COUTU (7)</b> 3779:8;3937:20,23, 24;3938:2,3;3942:1 <b>covenant (2)</b> 3750:17,18 <b>cover (7)</b> 3761:4;3780:19; 3836:16;3851:17; 3877:4;3916:21; 3945:4 <b>covered (4)</b> 3761:9,22;3794:11; 3941:12 <b>CPA (2)</b> 3790:6;3793:15 <b>CPLR (2)</b> 3850:14;3851:2 <b>Craig (8)</b> 3814:6,18;3817:16, 23;3823:6;3825:13; 3861:1;3866:9 <b>crashed (1)</b> 3762:19 <b>crazy (1)</b> 3943:1 <b>create (3)</b> 3779:16;3799:2; 3879:1 <b>created (1)</b> 3929:3 <b>creates (1)</b> 3828:11 <b>Creative (1)</b> 3855:18 <b>credentials (1)</b> 3790:12 <b>credit (1)</b> 3731:3 <b>crib (1)</b> 3901:19 <b>criminal (1)</b> 3880:21 <b>critical (1)</b> 3841:24 <b>cross (10)</b>	3829:25;3847:15; 3848:8,11,12;3849:25; 3852:8;3862:9; 3926:19;3942:22 <b>crosschecks (1)</b> 3770:12 <b>crosses (1)</b> 3849:19 <b>cross-examination (11)</b> 3734:23;3773:15; 3779:10;3780:22,24; 3806:4;3853:7,12; 3927:1;3938:1;3942:3 <b>cross-examined (1)</b> 3775:19 <b>crowd (1)</b> 3878:20 <b>crux (1)</b> 3768:2 <b>C-Trac (6)</b> 3768:20;3769:7,21; 3770:4,5,11 <b>C-Track (1)</b> 3829:21 <b>cue (1)</b> 3757:19 <b>Cullen (4)</b> 3742:11,23;3743:3; 3770:13 <b>Cummins (3)</b> 3814:19;3817:5; 3859:11 <b>current (3)</b> 3740:8;3806:13; 3812:24 <b>currently (6)</b> 3773:25;3810:5; 3890:19,25;3907:4; 3939:16 <b>Curtis (1)</b> 3824:17 <b>cut (1)</b> 3897:9 <b>cutting (1)</b> 3735:20 <b>cycle (1)</b> 3795:24	3930:17 <b>dates (2)</b> 3854:1;3945:5 <b>day (14)</b> 3736:24;3814:25; 3846:15,20;3848:2,9; 3849:14;3852:11; 3881:21;3921:14,17; 3947:10,20,25 <b>days (3)</b> 3738:1;3742:6; 3947:20 <b>day-to-day (1)</b> 3814:6 <b>DC (5)</b> 3807:4;3808:4; 3810:20;3811:2; 3898:11 <b>deal (6)</b> 3802:9;3815:16; 3851:7;3852:1; 3865:10;3885:20 <b>deals (3)</b> 3891:14,24;3924:22 <b>dealt (3)</b> 3818:17;3924:17,21 <b>Dean (1)</b> 3877:15 <b>debate (9)</b> 3883:14;3885:1,7, 10;3886:18;3887:1; 3936:21,25;3937:8 <b>debates (3)</b> 3885:11;3886:4,5 <b>debt (2)</b> 3750:17,18 <b>decades (3)</b> 3731:20;3886:14,16 <b>December (4)</b> 3797:18;3832:8,20; 3918:24 <b>decide (1)</b> 3884:9 <b>decided (2)</b> 3877:10;3920:4 <b>decision (12)</b> 3802:18;3804:19; 3805:19,23;3809:14; 3883:15;3892:24; 3893:20;3904:6; 3913:17;3920:22; 3943:12 <b>decisions (8)</b> 3802:15;3804:7; 3814:8;3823:15; 3859:22;3860:1; 3883:14;3884:14 <b>deemed (2)</b> 3758:13;3945:7 <b>deep (2)</b> 3884:20;3885:1 <b>default (3)</b> 3750:18;3850:6,9	<b>Defendant (7)</b> 3738:22;3789:20; 3812:2;3849:9; 3851:13;3875:14; 3892:25 <b>defendants (10)</b> 3737:4;3846:18; 3848:17;3850:8,12,16, 22;3851:19;3852:13; 3947:23 <b>Defense (7)</b> 3735:9;3738:17; 3811:18;3850:6; 3852:4;3857:9;3875:7 <b>deference (1)</b> 3852:16 <b>deficiencies (1)</b> 3776:8 <b>definitely (5)</b> 3730:22;3815:5,6; 3873:10;3880:10 <b>degree (4)</b> 3778:6;3790:17; 3816:3;3876:11 <b>degrees (1)</b> 3814:9 <b>Delaware (4)</b> 3901:5,5,8,10 <b>Delaware's (1)</b> 3901:6 <b>deliberate (1)</b> 3892:24 <b>deliberated (2)</b> 3760:8;3767:4 <b>deliberation (1)</b> 3883:18 <b>deliberative (1)</b> 3894:10 <b>deliver (1)</b> 3891:1 <b>delivered (4)</b> 3742:19,25;3777:11; 3908:25 <b>demonstrated (4)</b> 3783:20,23;3784:23; 3785:12 <b>demonstration (2)</b> 3878:16,21 <b>demonstratives (3)</b> 3730:19;3732:14; 3733:18 <b>denied (1)</b> 3811:5 <b>department (7)</b> 3790:21;3834:14; 3839:8;3867:19; 3891:21;3915:5; 3923:7 <b>departure (2)</b> 3814:11;3825:14 <b>depend (2)</b> 3943:8,19 <b>depending (1)</b>
			<b>D</b>	
		<b>dad (3)</b> 3876:1,5,5 <b>daily (2)</b> 3766:5;3881:1 <b>Dallas (2)</b> 3896:24;3898:11 <b>data (4)</b> 3732:1;3733:7; 3798:7;3799:2 <b>date (5)</b> 3781:8,11;3842:8; 3854:8;3948:13 <b>dated (1)</b>		

NYAG v  
NRA

February 8, 2024

3898:23 <b>depends (2)</b> 3839:10;3840:10 <b>deposed (4)</b> 3783:4,16;3784:16; 3869:14 <b>deposition (7)</b> 3783:12;3795:4; 3796:10,13,14; 3806:18;3869:23 <b>depth (3)</b> 3747:17;3748:9; 3775:4 <b>derive (1)</b> 3780:10 <b>describe (17)</b> 3745:5;3770:23; 3771:2,11;3787:22; 3807:25;3885:10; 3888:18;3889:23,24; 3893:8,10;3896:21; 3909:25;3912:6; 3915:13;3916:14 <b>described (7)</b> 3758:10;3841:3; 3867:19;3874:23; 3905:7,24;3908:13 <b>describes (1)</b> 3804:23 <b>describing (2)</b> 3730:12,20 <b>descriptive (1)</b> 3819:7 <b>designated (1)</b> 3837:1 <b>destination (1)</b> 3923:24 <b>detail (17)</b> 3757:17,21;3759:4; 3761:4,13;3766:22,22; 3767:11;3815:17; 3827:22;3829:1,5; 3837:10;3865:11,18; 3892:3;3893:10 <b>detailed (1)</b> 3765:12 <b>details (3)</b> 3762:3;3765:20; 3774:22 <b>detect (1)</b> 3781:14 <b>detecting (1)</b> 3763:18 <b>determine (3)</b> 3755:8;3907:2,6 <b>determined (1)</b> 3804:17 <b>determining (1)</b> 3752:14 <b>develop (1)</b> 3908:17 <b>Development (1)</b> 3890:22	<b>diagrammed (1)</b> 3802:14 <b>dialled (1)</b> 3847:23 <b>dicta (1)</b> 3849:22 <b>difference (4)</b> 3773:16;3801:22; 3802:1;3942:8 <b>different (46)</b> 3737:15,19;3739:14; 3747:25;3748:14,18, 23;3750:9,14;3752:7; 3755:19;3758:9; 3762:8;3774:12; 3791:24;3792:11; 3793:14;3794:22; 3797:11;3808:24; 3821:7;3827:13; 3830:1;3833:4;3835:8; 3840:15;3872:21; 3877:17,17,21; 3879:15;3880:17; 3885:15,22,23,24,24; 3887:6;3890:2,9,20; 3893:2,2;3896:23; 3898:15;3944:6 <b>differently (1)</b> 3785:21 <b>difficult (3)</b> 3791:8;3861:24; 3923:3 <b>dig (4)</b> 3759:8;3828:17; 3884:19;3885:1 <b>digest (1)</b> 3736:8 <b>digit (2)</b> 3835:25;3839:21 <b>digitize (1)</b> 3829:3 <b>diligently (1)</b> 3943:10 <b>Dillon (2)</b> 3871:9;3872:12 <b>Dillon's (1)</b> 3871:10 <b>dinner (2)</b> 3921:6,7 <b>dinnertime (1)</b> 3886:21 <b>direct (20)</b> 3750:23;3770:2; 3771:14;3779:6; 3789:25;3805:25; 3837:14,16;3858:8; 3859:3;3866:23; 3875:19;3887:4,11; 3904:25;3924:1; 3928:9;3935:9,24; 3936:11 <b>DIRECT-EXAMINATION (3)</b> 3812:15;3837:17;	3924:5 <b>Directing (2)</b> 3831:2,13 <b>directly (7)</b> 3760:22;3764:13; 3776:14;3837:4; 3863:20;3864:1,7 <b>director (18)</b> 3812:19;3813:16; 3863:15;3887:15; 3888:4,7;3896:18,22; 3897:5,6,8,16;3899:2; 3900:14;3901:5; 3908:11,14;3941:16 <b>directors (30)</b> 3733:3;3742:22; 3881:8;3882:13,21; 3885:4;3887:19; 3892:7,9,11;3897:12; 3898:3;3900:1,10; 3903:8;3905:11; 3910:12;3911:6,11; 3912:20;3915:6; 3919:5;3924:22; 3931:13,17;3935:14; 3939:14,17;3940:20; 3946:20 <b>director's (1)</b> 3749:23 <b>directory (2)</b> 3889:10,17 <b>disagree (7)</b> 3766:9;3776:8; 3820:21;3851:22; 3886:11;3911:25; 3914:4 <b>disagreed (1)</b> 3913:19 <b>disagreement (1)</b> 3732:11 <b>disagreements (2)</b> 3777:3;3912:4 <b>disagrees (2)</b> 3732:8;3776:17 <b>disaster (2)</b> 3914:13,16 <b>discharge (1)</b> 3899:20 <b>discharged (2)</b> 3746:9;3783:1 <b>disclose (3)</b> 3757:3;3929:22,25 <b>disclosed (5)</b> 3754:25;3758:6,14; 3929:12,17 <b>disclosing (2)</b> 3929:15,16 <b>disclosure (8)</b> 3756:25;3757:3,10; 3758:20;3918:4; 3925:20;3929:12,23 <b>disclosures (3)</b> 3756:15;3767:20,23	<b>disconnect (1)</b> 3769:25 <b>discrepancy (2)</b> 3846:12;3847:13 <b>discuss (7)</b> 3753:12;3762:13; 3817:21;3842:25; 3884:10;3888:3; 3904:15 <b>discussed (14)</b> 3730:11;3760:8; 3765:6,16,18;3767:4, 10,14;3794:12; 3799:17;3814:23,23; 3886:20,25 <b>discussing (2)</b> 3768:20;3855:21 <b>discussion (5)</b> 3750:23;3814:21; 3883:18;3890:15; 3919:6 <b>discussions (2)</b> 3765:17;3869:6 <b>disobeyed (1)</b> 3786:13 <b>Displayed (3)</b> 3775:22;3808:3; 3933:16 <b>dispute (1)</b> 3790:23 <b>disseminate (1)</b> 3753:11 <b>disseminated (1)</b> 3751:17 <b>dissolution (1)</b> 3805:15 <b>distilled (1)</b> 3733:22 <b>distinction (2)</b> 3797:5,9 <b>distinguish (1)</b> 3751:9 <b>diverted (1)</b> 3800:22 <b>Diverting (1)</b> 3785:22 <b>divide (1)</b> 3791:22 <b>Division (5)</b> 3769:15;3774:14; 3791:20,21,21 <b>divorce (1)</b> 3881:13 <b>document (42)</b> 3735:18;3737:12,13, 25;3758:23;3759:1; 3761:12;3771:2,9; 3776:17;3786:23; 3808:7;3811:8;3818:2, 7;3820:14,15,19,22,23; 3821:17;3823:16,25; 3854:2,11,21,22; 3855:1;3858:19;	3889:9,16;3913:13; 3930:11,13,16,21; 3932:11,17,20; 3934:16,20,22 <b>documentation (4)</b> 3744:19,21;3760:5; 3785:3 <b>documented (6)</b> 3751:19,20;3758:15; 3764:18;3765:21; 3767:7 <b>documents (28)</b> 3731:19;3733:7; 3746:2;3753:23; 3757:23;3762:21; 3766:3;3767:1;3769:4, 12;3771:11;3776:11; 3778:9;3786:15; 3790:25;3794:23; 3795:2;3803:6; 3822:10;3844:12; 3870:12,13,18; 3871:23;3906:8,9; 3913:11;3924:24 <b>dollar (2)</b> 3754:6;3799:2 <b>dollars (6)</b> 3748:11;3750:13,17; 3754:6;3815:22,22 <b>donations (1)</b> 3941:24 <b>done (28)</b> 3737:11;3741:8,15; 3766:1;3772:20; 3773:3;3777:10; 3792:3,17,18;3797:2; 3798:2;3799:5;3801:7; 3803:19;3835:21; 3845:2;3847:15,25; 3848:7;3867:10; 3889:2;3894:14; 3901:9;3910:16; 3926:8;3947:1,9 <b>door (1)</b> 3881:16 <b>dorms (2)</b> 3878:8,12 <b>doubt (1)</b> 3745:15 <b>doubts (1)</b> 3867:2 <b>down (23)</b> 3739:21;3778:18; 3788:21;3810:21; 3811:13;3823:1,6,25; 3829:6,9,11;3841:21; 3843:4;3848:1;3849:8; 3857:7;3875:11; 3917:1;3918:22; 3932:4;3935:19; 3946:7;3948:7 <b>downstairs (1)</b> 3730:4
---	--	---	---	---

NYAG v  
NRA

February 8, 2024

<b>dozen (1)</b> 3916:9	3813:19;3814:1; 3824:13;3832:11,20;	<b>either (14)</b> 3730:23;3734:24; 3735:4;3737:1; 3744:15;3777:5; 3791:12;3800:13; 3839:25;3844:23; 3863:7;3887:25; 3898:11;3942:17	<b>emphasized (1)</b> 3765:8	3877:22
<b>Dr (5)</b> 3793:13,21,24; 3794:12;3806:12	3881:7;3898:8,13; 3909:12;3910:23; 3947:13	3735:4;3737:1; 3744:15;3777:5; 3791:12;3800:13; 3839:25;3844:23; 3863:7;3887:25; 3898:11;3942:17	<b>employed (1)</b> 3869:10	<b>enormous (1)</b> 3815:20
<b>draft (3)</b> 3735:13;3737:20; 3877:5	<b>easier (1)</b> 3736:7	3791:12;3800:13; 3839:25;3844:23; 3863:7;3887:25; 3898:11;3942:17	<b>employee (5)</b> 3747:14,20;3760:19; 3801:19;3828:17	<b>enough (1)</b> 3905:18
<b>draw (5)</b> 3741:1,14;3780:5; 3784:22;3910:3	<b>east (2)</b> 3876:2;3877:19	<b>elect (6)</b> 3774:6;3897:6; 3902:25,25;3903:1; 3909:6	<b>employees (13)</b> 3827:14;3888:11,12, 15,24,25;3891:22; 3923:6;3938:16,18,19, 24;3943:5	<b>ensure (3)</b> 3753:15;3754:16; 3836:24
<b>drawers (1)</b> 3913:12	<b>easy (3)</b> 3734:19;3840:11; 3930:2	<b>elected (32)</b> 3887:5,6,12;3892:6; 3894:23,24;3896:18, 22;3897:5,10,12,16; 3900:9;3902:15,17; 3905:13;3906:14,20, 23;3908:1,2,12,14,15; 3909:5,10;3911:23; 3932:1;3936:16,19; 3939:13,20	<b>employer (8)</b> 3794:8,9,10; 3869:20;3944:1,7,8,9	<b>ensuring (2)</b> 3772:4;3835:17
<b>drawing (2)</b> 3755:10;3782:4	<b>eat (1)</b> 3878:12	<b>election (12)</b> 3895:6,8,17;3896:5, 15,16;3897:9;3932:6; 3933:22;3934:9; 3936:1;3937:11	<b>enable (2)</b> 3825:25;3911:20	<b>enter (2)</b> 3793:1;3838:12
<b>drill (2)</b> 3829:6,8	<b>economic (1)</b> 3791:12	<b>elections (14)</b> 3892:4;3894:20,21, 22,25;3895:2,4,6,9,16, 20;3930:8,25;3931:2	<b>enables (1)</b> 3829:13	<b>entered (4)</b> 3738:13;3789:13; 3853:3;3904:23
<b>drop-dead (1)</b> 3736:21	<b>Economics (1)</b> 3876:11	<b>electronic (1)</b> 3829:5	<b>encourage (2)</b> 3738:9;3891:8	<b>entering (4)</b> 3738:12;3789:12; 3853:2;3904:22
<b>due (3)</b> 3793:1;3893:8,11	<b>economist (3)</b> 3731:9;3793:10,14	<b>eligible (1)</b> 3897:8	<b>encouraged (1)</b> 3898:2	<b>entertainment (1)</b> 3898:18
<b>duly (5)</b> 3738:22;3789:20; 3812:3;3852:23; 3875:14	<b>Eddie (4)</b> 3835:12;3836:19,21; 3837:1	<b>eliminate (1)</b> 3848:11	<b>encouraging (1)</b> 3931:16	<b>enthusiast (1)</b> 3897:24
<b>during (19)</b> 3735:3;3737:22; 3738:1;3747:12; 3761:11;3774:13; 3820:24;3842:24; 3859:15;3866:14; 3869:1;3874:18; 3886:21;3889:6; 3904:14;3924:12; 3925:20;3933:5,6	<b>educate (2)</b> 3759:13;3830:23	<b>eliminated (1)</b> 3828:15	<b>end (12)</b> 3732:20;3736:24; 3766:7;3775:15; 3778:2;3804:14; 3846:15;3877:9; 3878:21;3879:11; 3918:24;3931:12	<b>enthusiastic (3)</b> 3879:17;3915:9; 3941:19
<b>duties (3)</b> 3749:23;3813:3; 3882:12	<b>education (10)</b> 3753:5;3784:10; 3793:19;3827:15; 3830:2,16;3835:13; 3841:24;3874:14; 3915:20	<b>elections (14)</b> 3892:4;3894:20,21, 22,25;3895:2,4,6,9,16, 20;3930:8,25;3931:2	<b>ended (10)</b> 3828:1;3876:3,9; 3877:7,7;3909:16; 3914:18,20;3937:12,13	<b>entire (9)</b> 3738:3;3755:16; 3802:4;3851:10,17; 3885:3;3914:7;3935:5, 22
<b>duty (6)</b> 3883:4,16,19; 3884:5,13;3941:16	<b>educational (2)</b> 3836:10;3878:15	<b>electronic (1)</b> 3829:5	<b>endorsement (1)</b> 3931:15	<b>entirely (1)</b> 3920:21
<b>DX1-0521 (2)</b> 3889:8,14	<b>effective (6)</b> 3763:23,25;3764:5; 3795:11;3800:6; 3844:12	<b>eligible (1)</b> 3897:8	<b>Enemy (1)</b> 3931:9	<b>entirety (1)</b> 3934:22
<b>DX1-0754 (2)</b> 3881:25;3882:6	<b>effectively (1)</b> 3782:13	<b>eliminate (1)</b> 3848:11	<b>enforcement (2)</b> 3785:9;3941:7	<b>entities (2)</b> 3748:13,14
<b>E</b>	<b>effectiveness (1)</b> 3782:16	<b>eliminated (1)</b> 3828:15	<b>engage (1)</b> 3886:3	<b>entitled (4)</b> 3893:3,5;3897:4; 3931:9
<b>each- (1)</b> 3835:25	<b>effort (3)</b> 3769:14;3778:24; 3862:3	<b>else (7)</b> 3788:18;3802:20; 3819:9;3897:14; 3913:3;3921:16; 3926:8	<b>engaged (7)</b> 3769:5;3807:3; 3814:6;3824:11; 3867:20,23;3923:11	<b>entity (2)</b> 3804:4,4
<b>Eagle (4)</b> 3835:12;3836:19,21; 3837:1	<b>efforts (5)</b> 3779:2;3793:18; 3794:17;3827:5; 3861:16	<b>email (5)</b> 3730:3;3829:14; 3857:3,5;3867:12	<b>engagement (8)</b> 3739:6;3742:13,14, 15,17;3805:14,19; 3806:19	<b>entrenched (1)</b> 3902:13
<b>earlier (17)</b> 3738:10;3751:3; 3759:11;3767:2; 3770:20;3771:1,4; 3775:15;3793:9; 3803:1;3857:4; 3869:18;3870:1; 3911:24;3936:9; 3938:6;3946:14	<b>Eight (3)</b> 3790:19;3813:12; 3897:11	<b>e-mail (4)</b> 3838:4,8;3845:8; 3931:8	<b>engagements (10)</b> 3917:3;3918:22; 3928:2,7;3940:7,13,16; 3941:1,20,24	<b>envelope (1)</b> 3829:2
<b>early (11)</b>	<b>eighties (2)</b> 3881:7;3910:23	<b>embodied (2)</b> 3760:24;3761:5	<b>engages (1)</b> 3758:13	<b>environment (3)</b> 3764:3;3775:9; 3787:18
	<b>EISENBERG (18)</b> 3812:11,13,16; 3813:4,7;3820:16; 3821:1;3837:12; 3855:9,19;3858:18; 3864:2;3869:17; 3870:6;3871:5,21; 3872:5;3875:5	<b>emerged (1)</b> 3869:5	<b>enhanced (1)</b> 3761:12	<b>equal (1)</b> 3915:17
		<b>Emily (5)</b> 3814:19;3817:5; 3818:2;3859:11,15	<b>enjoyed (1)</b>	<b>equitable (1)</b> 3848:16
				<b>Equity (1)</b> 3879:23
				<b>Eric (1)</b> 3809:16
				<b>error (3)</b> 3749:10;3750:9,14
				<b>Erstling (23)</b> 3811:19;3812:6,17; 3817:7;3818:7;3821:2; 3830:25;3831:4; 3837:12,19;3838:21;

NYAG v  
NRA

February 8, 2024

3842:24;3852:23; 3853:8,14,17;3854:11, 20;3856:5,6;3858:5, 16;3872:6 <b>E-R-S-T-L-I-N-G (1)</b> 3812:8 <b>escape (1)</b> 3738:10 <b>especially (6)</b> 3848:17;3898:5; 3910:16;3912:21; 3923:6;3941:6 <b>essentially (1)</b> 3730:15 <b>established (4)</b> 3748:19;3782:9; 3784:7;3883:16 <b>estate (1)</b> 3879:14 <b>et (1)</b> 3837:2 <b>ethical (1)</b> 3892:18 <b>ethics (2)</b> 3760:24;3893:7 <b>evaluate (7)</b> 3746:4;3749:15; 3766:7;3793:17; 3810:8;3920:4;3922:2 <b>evaluated (1)</b> 3810:4 <b>evaluating (4)</b> 3759:10;3782:16; 3787:20;3794:17 <b>evaluation (1)</b> 3785:14 <b>even (20)</b> 3737:25;3745:17,19; 3761:17;3762:23; 3778:16;3785:9; 3787:21;3824:14; 3847:25;3852:15; 3867:12;3880:6; 3884:16;3886:6; 3901:13;3903:14; 3912:18;3923:20; 3940:25 <b>events (3)</b> 3898:21,21;3906:5 <b>eventually (1)</b> 3912:16 <b>everybody (6)</b> 3830:8;3848:22; 3873:1;3885:13; 3893:12;3912:20 <b>everyone (9)</b> 3730:1;3738:9,15; 3837:7;3883:12,20; 3891:10;3905:3; 3937:24 <b>evidence (24)</b> 3763:6;3766:6,18; 3767:3,9,13,17;	3800:11;3818:5; 3820:15,19,20; 3847:23;3849:5; 3856:7;3880:21; 3881:4;3882:1,7,9; 3889:15;3931:7; 3933:14;3935:8 <b>EVP (3)</b> 3828:5,9;3864:25 <b>exact (5)</b> 3783:18;3842:8; 3854:1,8;3928:22 <b>Exactly (5)</b> 3794:13;3829:18; 3871:11;3874:20; 3887:17 <b>EXAMINATION (7)</b> 3786:5;3789:25; 3866:23;3872:4; 3875:19;3904:25; 3926:19 <b>examine (1)</b> 3921:11 <b>examined (1)</b> 3794:3 <b>example (31)</b> 3732:16;3741:2; 3744:8;3745:13; 3746:19;3747:16; 3749:10;3752:5; 3754:23;3757:9; 3758:19,19,24; 3760:18,23;3764:14; 3769:11;3774:13; 3792:21,24;3797:15; 3801:8,19;3836:1; 3841:17;3849:19; 3874:13;3890:13,19; 3901:4;3942:24 <b>examples (1)</b> 3801:9 <b>except (1)</b> 3897:23 <b>excerpted (1)</b> 3934:23 <b>exchange (1)</b> 3857:4 <b>excluded (3)</b> 3731:17,17;3900:23 <b>exclusively (1)</b> 3739:12 <b>excused (1)</b> 3811:15 <b>executive (9)</b> 3765:18;3887:13; 3894:15;3897:23; 3907:7,11,17;3910:6; 3912:11 <b>executives (2)</b> 3888:4,9 <b>exercise (1)</b> 3882:14 <b>Exhibit (13)</b>	3775:20;3776:1; 3818:6;3854:16; 3856:1;3882:6,10; 3889:14,20;3931:6; 3932:3;3933:13; 3935:7 <b>exhibitors (1)</b> 3898:17 <b>exhibits (4)</b> 3799:7;3840:17; 3844:8;3858:16 <b>existence (1)</b> 3919:4 <b>existing (2)</b> 3753:6,13 <b>exists (2)</b> 3763:19;3894:4 <b>exiting (3)</b> 3789:2;3842:21; 3947:14 <b>exits (3)</b> 3789:3;3904:18; 3947:15 <b>expansion (1)</b> 3925:19 <b>expect (7)</b> 3751:11,20;3769:2; 3839:13;3845:4; 3878:18;3888:4 <b>expenditure (1)</b> 3849:6 <b>expenditures (1)</b> 3815:14 <b>expense (7)</b> 3801:21;3821:14; 3828:2,17;3852:18; 3874:20;3943:5 <b>expenses (14)</b> 3802:24;3836:2,5, 17;3837:10;3918:6; 3928:19,22,23;3929:5; 3941:17;3944:24; 3945:7,8 <b>expensive (4)</b> 3802:22,22;3921:25; 3922:1 <b>experience (23)</b> 3731:21;3741:12; 3742:3;3751:8; 3755:10;3768:22; 3775:2;3784:10; 3790:12;3793:19; 3805:13;3815:15; 3849:16;3877:18,20; 3878:10;3885:25; 3903:5;3910:24; 3922:1;3925:19; 3926:10,11 <b>experienced (1)</b> 3879:22 <b>expert (43)</b> 3731:16,18;3732:10, 12;3734:12,24;3735:5;	3743:6,18;3744:13,14, 22;3745:23;3749:23, 23;3750:1;3762:16; 3765:24;3766:1,11; 3773:1;3787:17; 3789:8;3790:9;3791:2; 3793:5,11;3794:7; 3796:17;3799:5,10; 3807:3,13,22;3808:10, 11,17;3809:13,16; 3810:23;3811:1; 3848:10;3920:6 <b>expertise (3)</b> 3731:12;3782:17; 3890:2 <b>experts (16)</b> 3730:23;3731:1,4,6, 8;3732:23;3742:9; 3752:7;3766:2,8,11,12; 3768:14;3795:25; 3847:19;3885:15 <b>expert's (1)</b> 3735:4 <b>explain (15)</b> 3742:14;3750:3,5, 25;3766:25;3767:16; 3790:14;3797:14; 3802:13;3838:1; 3872:22;3883:22; 3895:24;3913:6,11 <b>explanation (1)</b> 3808:22 <b>explicitly (2)</b> 3766:13;3777:20 <b>exposure (1)</b> 3925:11 <b>express (1)</b> 3886:12 <b>expressed (1)</b> 3815:13 <b>extended (1)</b> 3773:8 <b>extent (8)</b> 3745:5;3759:16; 3767:12;3770:23; 3773:4;3820:1; 3821:24;3831:15 <b>external (5)</b> 3760:20;3769:8; 3772:7;3788:15; 3791:25 <b>extraordinary (3)</b> 3908:18;3909:13,14 <b>extremely (3)</b> 3759:1;3908:8; 3947:19 <b>eyes (1)</b> 3825:9	<b>facing (1)</b> 3804:24 <b>fact (28)</b> 3730:24;3731:13; 3744:10;3745:8,20; 3757:6;3758:11; 3765:10,15;3766:3,15; 3767:6;3809:14; 3811:20;3819:17; 3825:24;3862:5,14; 3878:19;3880:3; 3888:10;3920:22; 3922:14;3923:16; 3928:5;3931:23; 3944:13,15 <b>factor (2)</b> 3787:19;3848:4 <b>factors (2)</b> 3752:14;3762:8 <b>facts (7)</b> 3766:16;3771:11; 3805:2,8,10;3825:25; 3826:4 <b>factual (5)</b> 3762:13;3763:2; 3765:22;3766:8; 3805:5 <b>failed (1)</b> 3770:16 <b>fair (18)</b> 3749:24;3770:2; 3801:18;3813:23; 3819:22;3825:4,6; 3826:16;3831:4; 3865:4;3872:8,9,17; 3875:3;3893:12; 3895:3,8;3903:15 <b>Fairfax (1)</b> 3921:15 <b>fairly (8)</b> 3740:5;3749:6; 3751:10;3768:1; 3845:11;3865:2; 3874:11;3912:18 <b>Fall (8)</b> 3797:20;3801:15; 3836:11;3898:9; 3943:1,17;3944:2,10 <b>familiar (8)</b> 3751:9;3885:21; 3890:8,21;3927:11; 3930:18;3932:22; 3933:1 <b>family (3)</b> 3886:8;3921:6; 3933:9 <b>famous (1)</b> 3878:13 <b>fan (2)</b> 3865:5,6 <b>Fantastic (1)</b> 3941:23 <b>far (16)</b>
			<b>F</b>	
			<b>face (3)</b> 3885:18;3910:2,9	

NYAG v  
NRA

February 8, 2024

3743:12,14;3767:11; 3800:13;3824:5,8; 3826:8;3831:8; 3838:13;3846:13; 3848:19;3851:23; 3862:6,15;3903:12; 3946:3 <b>FARBER (31)</b> 3735:8,24;3736:3,9; 3819:15,20;3820:8,13, 18;3822:2,23;3825:16, 20;3826:3;3831:25; 3834:2;3837:16; 3847:7;3849:11; 3850:4,19;3851:2,5; 3859:19;3862:11,21, 23;3872:2,20;3873:11; 3924:3 <b>FASB (2)</b> 3756:9,16 <b>F-A-S-B (1)</b> 3756:9 <b>fashion (2)</b> 3741:8;3769:9 <b>fast (1)</b> 3739:20 <b>fault (1)</b> 3744:15 <b>favorite (2)</b> 3908:7,9 <b>FDQ (1)</b> 3758:20 <b>February (2)</b> 3896:5;3948:19 <b>Federal (9)</b> 3757:16;3758:14; 3768:4,12;3769:1,5,7, 11;3774:3 <b>fee (2)</b> 3928:16;3940:22 <b>feedback (1)</b> 3918:12 <b>feel (6)</b> 3852:4;3883:4,7; 3894:18;3902:23; 3925:25 <b>feeling (1)</b> 3851:24 <b>fees (8)</b> 3918:3;3921:9,21; 3922:8,9,14,14; 3928:23 <b>follow (3)</b> 3744:10;3893:7; 3901:3 <b>felt (10)</b> 3757:9;3914:6; 3923:21,22;3925:24; 3926:9,11,13;3939:7; 3941:15 <b>few (10)</b> 3738:1;3747:25; 3758:17;3817:24;	3853:16;3878:1,19; 3937:16,20;3947:25 <b>fiduciary (6)</b> 3744:6,11;3883:16, 19;3884:5;3914:10 <b>fields (1)</b> 3790:12 <b>fifteen (2)</b> 3852:19;3881:19 <b>fifth (1)</b> 3852:15 <b>fight (1)</b> 3914:4 <b>figure (3)</b> 3735:22;3816:6; 3849:7 <b>figured (2)</b> 3845:8;3918:25 <b>figuring (1)</b> 3832:15 <b>file (3)</b> 3774:3;3893:3,5 <b>filed (5)</b> 3772:20;3804:9,14; 3920:1,25 <b>files (1)</b> 3834:19 <b>filing (5)</b> 3767:25;3768:2; 3920:4,17;3923:21 <b>filings (12)</b> 3736:7;3746:7; 3767:16;3768:18; 3782:20;3844:24; 3873:21,22,22,24,24; 3922:16 <b>fill (4)</b> 3770:15,16;3771:6; 3900:2 <b>filled (1)</b> 3911:15 <b>film (1)</b> 3739:8 <b>filters (1)</b> 3758:5 <b>final (1)</b> 3830:2 <b>finalize (1)</b> 3846:12 <b>finally (2)</b> 3874:21;3881:18 <b>finance (15)</b> 3793:21;3794:17; 3812:19;3832:7,8,11; 3834:9;3864:23; 3867:19;3938:14,16, 16,18,19,24 <b>finances (4)</b> 3912:14;3938:7; 3939:2,7 <b>financial (84)</b> 3731:8;3734:3,11; 3740:19;3744:5,22;	3748:4,21,22;3749:5,6, 13,16;3750:7,8; 3751:5;3754:5;3756:5, 8,15,18,19,21,23,23; 3757:1,5,8,18;3758:14, 20;3763:16,17,21; 3767:19,21;3768:3,10; 3769:1,15;3771:20,25; 3773:16;3774:1,3,13; 3775:3;3779:13,16; 3780:3,11;3788:12; 3790:7,13,25;3791:13; 3792:8,15;3793:5,15; 3794:25;3797:10; 3803:8;3808:23; 3809:1;3813:16; 3814:23;3817:3; 3818:14;3828:25; 3829:8;3863:16; 3864:16,17;3873:18; 3913:9,20;3918:4; 3923:6,11;3925:19; 3929:12,23;3946:22 <b>financially (3)</b> 3912:25;3913:6,23 <b>financials (5)</b> 3748:8;3768:11; 3780:6;3787:24; 3828:23 <b>find (6)</b> 3760:16,25;3921:20; 3925:9;3930:2;3946:7 <b>finding (1)</b> 3916:4 <b>findings (2)</b> 3731:5;3734:11 <b>fine (2)</b> 3913:6;3917:4 <b>finish (1)</b> 3846:15 <b>finishes (1)</b> 3850:8 <b>fire (1)</b> 3861:1 <b>firearms (4)</b> 3884:24;3908:25; 3909:1;3941:9 <b>firm (39)</b> 3739:16;3740:1,4,6, 7,18,19,19,21;3743:14; 3744:8;3757:8; 3768:14;3778:15; 3781:10;3791:6,9,13, 13;3806:13,13;3870:8; 3871:6,7,10,11;3879:4, 6,7,8,9;3880:4;3895:1, 22;3896:9,10,11,14; 3920:11 <b>firms (9)</b> 3739:17,17;3740:2, 13,23,24;3741:5; 3790:19,20 <b>firm's (2)</b>	3741:10;3921:21 <b>first (38)</b> 3736:11;3738:22; 3739:20;3744:19; 3760:16;3789:20; 3799:17;3812:3; 3819:23;3821:17; 3824:2,5;3842:5; 3850:7,8,10,16,19; 3866:5,19;3871:3; 3875:14;3880:3; 3886:19;3887:17; 3902:18;3905:22; 3907:5;3908:11,14; 3909:7;3910:22; 3918:5;3924:17; 3925:24;3929:14; 3934:23;3935:20 <b>firsthand (3)</b> 3766:4;3819:16; 3820:4 <b>fiscal (1)</b> 3832:16 <b>five (14)</b> 3797:21;3814:10; 3821:6;3827:18; 3835:25;3839:21; 3846:20;3880:14; 3896:3;3897:10; 3909:16,17;3935:19; 3948:2 <b>five-page (2)</b> 3758:23;3759:1 <b>five-year (1)</b> 3897:3 <b>fix (2)</b> 3923:19;3946:8 <b>fixing (1)</b> 3946:8 <b>flabbergasted (1)</b> 3824:23 <b>flag (1)</b> 3768:15 <b>flagged (1)</b> 3801:16 <b>flags (2)</b> 3802:5;3810:2 <b>flat (3)</b> 3928:16;3929:1; 3940:22 <b>flattered (1)</b> 3906:15 <b>FLEMING (20)</b> 3779:9,11;3780:21; 3806:2;3837:18; 3842:18;3844:6,16,20, 25;3845:22;3846:2; 3847:9;3848:3; 3850:18;3853:22; 3924:4,6,9;3926:18 <b>Fleming's (1)</b> 3845:7 <b>flexibility (2)</b>	3849:25;3948:3 <b>flight (1)</b> 3799:21 <b>flip (1)</b> 3850:1 <b>floated (1)</b> 3903:20 <b>floor (1)</b> 3822:25 <b>floors (2)</b> 3880:7,8 <b>focus (7)</b> 3733:22;3752:8; 3753:25;3756:4; 3774:25;3821:22; 3906:25 <b>focused (1)</b> 3807:11 <b>focusing (1)</b> 3825:23 <b>Focussing (1)</b> 3764:25 <b>fold (1)</b> 3735:18 <b>folded (1)</b> 3737:3 <b>folks (1)</b> 3947:9 <b>follow (6)</b> 3741:9;3770:3; 3798:5,5;3830:24; 3922:13 <b>followed (4)</b> 3785:15;3786:8,13; 3892:23 <b>following (12)</b> 3736:18;3752:4,17; 3778:22;3798:10; 3801:22;3833:5; 3854:9;3876:12; 3908:15;3919:8; 3936:15 <b>follows (5)</b> 3738:23;3789:21; 3812:4;3852:25; 3875:15 <b>food (1)</b> 3878:12 <b>foot (1)</b> 3796:9 <b>force (1)</b> 3771:7 <b>forecasting (2)</b> 3817:4;3873:18 <b>forensic (18)</b> 3734:4;3790:12; 3791:1;3792:1,19,20; 3793:5;3796:18,23; 3798:6;3799:1,20,23; 3800:12,20;3808:19; 3811:2,6 <b>forensics (4)</b> 3790:7,13;3793:5,15
---	---	---	---	--

NYAG v  
NRA

February 8, 2024

<b>forgot (2)</b> 3736:2;3845:22	3947:24	3935:9,23;3938:3; 3942:5;3947:2,4	3787:8,11	<b>goes (7)</b> 3757:16;3801:6; 3832:12;3840:18; 3841:6;3850:7; 3897:25
<b>form (34)</b> 3733:7;3742:23; 3757:12,16,16; 3758:15;3762:22; 3765:1;3767:1,25; 3768:1,4,12,23;3769:1, 5,7,11,16;3770:20; 3774:3;3782:22; 3787:4;3796:20; 3797:16;3806:20; 3814:1;3825:25; 3888:23;3900:2; 3929:12,23;3940:17,19	<b>four-page (1)</b> 3930:16	<b>F-R-O-M-A-N (1)</b> 3875:17	<b>gave (4)</b> 3830:13;3872:16; 3874:11;3923:6	<b>Good (41)</b> 3730:1;3733:14,15; 3738:20;3744:24; 3779:12;3781:1,2; 3786:8;3787:12; 3788:22;3789:18; 3790:2,3;3806:6,7; 3811:16;3812:11,12, 13;3825:6;3837:20; 3851:18;3853:14,15; 3858:5,7;3862:23; 3875:21;3878:13; 3903:21,23;3904:11; 3908:25;3926:12,20; 3927:3,4;3935:6; 3938:3;3941:8
<b>formal (3)</b> 3787:2,21;3868:19	<b>fourth (1)</b> 3852:15	<b>front (3)</b> 3882:11;3936:24; 3937:2	<b>GC (1)</b> 3846:1	<b>goods (1)</b> 3754:20
<b>format (2)</b> 3758:1;3828:25	<b>framed (1)</b> 3769:23	<b>frustrated (6)</b> 3815:15;3817:16; 3863:25;3864:5; 3865:10,14	<b>General (36)</b> 3751:25;3761:7; 3764:14,16;3769:14; 3774:14;3777:21; 3792:7;3801:11; 3807:1,4;3809:8,15; 3810:19;3828:7; 3829:1;3836:9;3837:4; 3844:7;3848:5; 3866:20;3869:6; 3873:20;3882:14; 3891:21;3894:13; 3911:2,4;3924:20; 3925:2,6;3926:5; 3927:6;3943:15,16,21	<b>Google (1)</b> 3819:5
<b>formed (3)</b> 3758:10;3767:17; 3913:22	<b>framework (6)</b> 3784:7,13;3785:6; 3787:2,16,21	<b>fulfillment (1)</b> 3839:24	<b>generally (11)</b> 3749:7;3756:7,16; 3780:4;3790:7; 3791:11;3792:4; 3798:3,5;3845:11; 3943:11	<b>govern (1)</b> 3763:9
<b>former (2)</b> 3859:18;3910:16	<b>Frankly (3)</b> 3849:20;3918:1; 3920:21	<b>full (5)</b> 3767:11;3832:12; 3895:3;3923:7; 3935:25	<b>general's (8)</b> 3753:24;3768:7; 3772:9;3796:12; 3809:16;3842:15; 3922:18;3927:6	<b>governance (29)</b> 3744:25;3747:14,20; 3751:18;3752:6; 3759:21;3761:1; 3765:9;3770:14; 3774:20,24;3775:6; 3776:25;3777:22; 3778:3;3780:15; 3783:20,24;3784:23; 3785:13;3787:5,12,19; 3806:24;3807:9,23; 3808:12,18;3810:24
<b>forming (8)</b> 3747:7,19,24; 3773:1;3776:2;3795:8; 3798:8;3810:6	<b>fraud (15)</b> 3763:15,18,19,23; 3764:1,2,3,4;3791:1; 3796:24;3797:1; 3800:10,11,21;3801:1	<b>fully (1)</b> 3845:22	<b>gentleman (2)</b> 3901:5;3915:22	<b>governing (2)</b> 3882:13;3889:25
<b>forms (2)</b> 3759:3;3768:6	<b>Frazer (17)</b> 3769:13;3818:11; 3826:24;3840:25,25; 3841:7,15;3845:8; 3847:8;3848:10; 3866:19;3869:6; 3922:9;3924:9,11,15; 3929:15	<b>function (2)</b> 3774:9;3841:24	<b>George (3)</b> 3814:20;3817:6; 3824:25	<b>Government (3)</b> 3792:2;3875:8; 3947:24
<b>formulate (1)</b> 3882:13	<b>Frazer's (3)</b> 3867:2;3925:20,23	<b>functionally (1)</b> 3907:11	<b>gets (7)</b> 3733:2;3829:16; 3839:7,16;3849:7; 3901:4;3939:13	<b>Government's (2)</b> 3796:16;3799:1
<b>forth (2)</b> 3735:4;3757:11	<b>free (7)</b> 3788:20;3875:10; 3877:9;3883:11,13; 3947:6,7	<b>functioning (1)</b> 3810:5	<b>gift (1)</b> 3943:6	<b>grade (1)</b> 3876:8
<b>forty-five (3)</b> 3851:14;3880:22,25	<b>freedom (1)</b> 3916:18	<b>functions (2)</b> 3906:4;3915:8	<b>gifts (1)</b> 3943:4	<b>graduated (6)</b> 3739:9,23;3876:10; 3877:14,19;3879:3
<b>forward (10)</b> 3762:23;3763:6; 3764:11,15;3765:7; 3797:25;3801:15; 3817:17;3824:14; 3839:25	<b>freely (2)</b> 3888:8,10	<b>fundamentals (1)</b> 3739:24	<b>given (12)</b> 3761:6;3770:12; 3774:11,11;3778:19; 3793:17;3804:22; 3834:13;3842:6; 3888:19,24;3933:20	<b>grain (1)</b> 3904:4
<b>found (11)</b> 3758:8;3759:21; 3760:12;3762:6; 3768:10,13;3807:13, 22;3819:5;3828:19; 3923:10	<b>frees (1)</b> 3848:9	<b>fundraising (2)</b> 3898:21;3915:5	<b>gives (5)</b> 3764:1;3779:21; 3780:1;3798:6;3837:6	<b>granted (1)</b> 3836:21
<b>foundation (18)</b> 3745:19;3748:17; 3807:5;3834:2,23,25; 3835:6,6,17;3836:6,14, 15,17,18,25;3837:8,9, 11	<b>French (1)</b> 3878:14	<b>funds (11)</b> 3785:18,24;3834:25; 3835:5,6,9,17;3836:25; 3853:17,19;3860:24	<b>giving (6)</b> 3766:17;3830:13; 3913:16;3916:10; 3918:19;3922:2	<b>granular (2)</b> 3837:22;3850:21
<b>four (21)</b> 3735:11;3736:5; 3737:13;3739:17; 3740:2;3790:20; 3825:7;3827:12,18; 3848:23,23;3849:3,8, 12,23;3850:12; 3880:14;3890:4; 3892:14;3897:10;	<b>frequency (1)</b> 3814:11	<b>Funny (1)</b> 3880:6	<b>goal (3)</b> 3832:4;3835:9; 3879:8	<b>Grassroots (3)</b> 3818:16;3890:22; 3891:2
	<b>frequent (1)</b> 3937:10	<b>further (22)</b> 3759:4;3786:3; 3788:3,19;3797:12,13; 3802:5;3810:3,14; 3811:9,10,11;3835:10, 14;3837:13;3857:7,8; 3872:2;3874:22; 3875:5,7,9	<b>goals (2)</b> 3886:8,10	<b>Great (9)</b> 3796:5;3815:16; 3865:10;3877:20,22;
	<b>frequently (1)</b> 3766:12	<b>furtherance (1)</b> 3853:18		
	<b>Friedman (2)</b> 3740:4,7	<b>future (1)</b> 3923:5		
	<b>friend (5)</b> 3912:23;3915:25; 3923:18;3946:6,24	<b>G</b>		
	<b>friends (3)</b> 3921:3,5;3946:19	<b>gamut (1)</b> 3941:12		
	<b>frightened (1)</b> 3881:15	<b>GAP (1)</b> 3798:5		
	<b>Froman (20)</b> 3875:12,17,21,24; 3883:3;3889:16; 3905:6;3914:4;3924:7; 3927:3;3928:1,11; 3929:21;3930:16;	<b>gather (2)</b> 3904:5;3905:16		
		<b>gathering (1)</b> 3905:18		
		<b>gauge (2)</b>		

NYAG v  
NRA

February 8, 2024

3878:18;3901:12,23; 3937:24 <b>Greg (1)</b> 3745:1 <b>grew (2)</b> 3740:6;3876:1 <b>grounded (1)</b> 3739:24 <b>group (12)</b> 3780:6;3790:23; 3805:14;3815:8; 3838:11;3855:18; 3867:18,20,23; 3872:19;3873:4; 3883:14 <b>grouping (1)</b> 3830:2 <b>groups (5)</b> 3774:12;3827:13; 3915:17,19;3941:12 <b>growing (1)</b> 3876:5 <b>grown (1)</b> 3877:21 <b>guess (7)</b> 3734:15;3737:2; 3803:22;3850:9; 3866:22;3878:9; 3912:12 <b>guidance (3)</b> 3763:20;3784:9,11 <b>guidelines (2)</b> 3747:24;3784:15 <b>Guild (1)</b> 3908:21 <b>Gun (11)</b> 3835:12;3836:19; 3881:11,22,22;3891:7; 3911:8;3916:5,7; 3941:14,14 <b>guns (2)</b> 3915:23,25 <b>guy (1)</b> 3901:12	3747:14;3760:19 <b>handbooks (1)</b> 3747:20 <b>Handed (7)</b> 3813:9;3823:6; 3930:15;3932:13,16; 3934:17,19 <b>handing (1)</b> 3934:20 <b>handle (1)</b> 3926:12 <b>handled (5)</b> 3732:18;3751:17; 3886:19;3894:19; 3926:4 <b>handling (7)</b> 3752:12;3755:23; 3782:10;3884:24; 3894:11,21;3925:5 <b>handy (1)</b> 3820:16 <b>happen (7)</b> 3737:9;3754:23; 3827:4;3885:11; 3924:14;3942:14,16 <b>happened (9)</b> 3818:15;3827:16; 3861:22;3870:14,15; 3874:18;3875:3; 3914:16;3921:19 <b>happening (3)</b> 3825:12;3861:14; 3940:12 <b>happens (5)</b> 3740:18;3741:8; 3753:17;3832:22; 3886:18 <b>happy (5)</b> 3736:22;3786:20; 3876:9;3916:19; 3937:23 <b>hard (5)</b> 3770:3;3858:23; 3884:11;3912:20; 3943:21 <b>harder (1)</b> 3737:13 <b>harm (1)</b> 3797:2 <b>Harvard (5)</b> 3877:15,19,24; 3879:1;3880:9 <b>hats (1)</b> 3744:4 <b>head (3)</b> 3740:5;3915:5; 3916:15 <b>Headquarters (1)</b> 3921:15 <b>heads (1)</b> 3834:14 <b>head's (1)</b> 3730:1	<b>healthcare (1)</b> 3792:22 <b>hear (15)</b> 3732:17;3766:15; 3773:15;3781:1; 3790:19;3792:14; 3794:3;3795:15; 3799:18;3867:5; 3891:16;3894:13,14; 3903:10;3937:24 <b>heard (41)</b> 3733:1;3734:17; 3742:5,11,12;3745:1; 3747:3,25;3748:15,16; 3750:15;3759:23; 3766:14;3772:8,19,22; 3776:7,15;3791:3,15, 24,24;3793:9,21; 3795:2,18;3796:3; 3797:19,24;3802:8; 3805:4;3844:9;3849:4; 3861:5;3883:19; 3893:18;3897:15; 3901:13,21;3905:25; 3911:5 <b>hearings (6)</b> 3736:20;3892:16,17, 23;3893:14,20 <b>hears (1)</b> 3892:17 <b>hearsay (4)</b> 3819:21;3820:22; 3845:19;3859:16 <b>heckles (1)</b> 3901:14 <b>heightened (2)</b> 3754:21;3759:15 <b>held (3)</b> 3868:19;3898:10,24 <b>Hello (4)</b> 3837:19;3921:19; 3924:8;3942:7 <b>help (9)</b> 3899:18;3903:7; 3916:3;3921:1;3923:2, 23;3926:13;3941:17, 17 <b>helped (2)</b> 3912:2;3915:22 <b>helpful (5)</b> 3858:22;3861:25; 3925:9,10;3947:19 <b>here's (10)</b> 3733:5,6,20,20,21, 23;3735:20,21; 3801:15;3802:6 <b>Heston (14)</b> 3908:2,3,4,7,10; 3909:2,4,18,19;3910:1, 8,14,16;3914:22 <b>Heston's (2)</b> 3909:13;3910:5 <b>hey (2)</b>	3827:22;3873:4 <b>Hi (1)</b> 3924:7 <b>hide (1)</b> 3819:11 <b>high (11)</b> 3832:3;3858:4; 3876:8;3880:7; 3920:13;3921:9,21,22, 22;3922:3,11 <b>higher (3)</b> 3868:3,11;3869:12 <b>highest (1)</b> 3925:25 <b>highlighted (3)</b> 3793:20;3798:2; 3808:5 <b>himself (2)</b> 3871:16;3909:16 <b>hindsight (1)</b> 3914:10 <b>Hines (18)</b> 3734:2;3792:1; 3795:14;3796:17,20; 3797:4,9;3799:17; 3801:7,24;3802:3,16, 23;3809:16,18,20,22, 24 <b>Hines' (2)</b> 3800:7;3801:15 <b>hired (4)</b> 3743:11;3807:7; 3861:2;3926:7 <b>hires (2)</b> 3771:19,21 <b>hiring (2)</b> 3823:7,11 <b>history (3)</b> 3844:20;3880:4; 3887:21 <b>hoc (1)</b> 3868:22 <b>hold (4)</b> 3815:3,5;3860:13; 3925:1 <b>holiday (1)</b> 3947:11 <b>home (3)</b> 3910:24;3921:6,6 <b>hone (1)</b> 3948:6 <b>honest (2)</b> 3901:11;3942:11 <b>honestly (1)</b> 3935:17 <b>Honor (81)</b> 3730:8,22;3732:15; 3735:9,16;3736:9,15, 22;3737:14;3738:4,18; 3749:21;3755:13; 3762:12;3769:20; 3773:10;3776:12; 3779:7,8;3780:23;	3788:4,24;3793:6; 3797:6;3799:4,15; 3800:15;3803:13; 3804:11;3811:11,23; 3812:11;3813:4; 3819:15;3820:8,13,16; 3821:1;3822:2,23; 3825:16,20;3826:3; 3830:3;3831:25; 3834:2;3835:2; 3837:15,16;3845:6; 3846:8,24;3847:2,9,16; 3848:3;3850:14,23; 3851:21,22;3852:6; 3853:11;3854:19; 3855:22;3859:16,20; 3862:20;3872:2; 3875:9;3904:17; 3920:5;3924:2,3; 3926:21;3928:10; 3930:14;3932:11; 3934:15;3937:20,22; 3947:8 <b>hoped (1)</b> 3735:25 <b>hopeful (1)</b> 3735:17 <b>hopefully (3)</b> 3736:13;3778:22; 3845:18 <b>horrific (1)</b> 3825:11 <b>hospitals (1)</b> 3792:22 <b>hot (1)</b> 3916:6 <b>hotel (2)</b> 3898:10;3929:8 <b>hour (16)</b> 3738:7;3806:10; 3846:21;3847:3,4,6,10; 3849:23;3850:2; 3851:10,11,12,23; 3852:19,19;3886:21 <b>hourly (3)</b> 3781:6;3806:8; 3916:20 <b>hours (17)</b> 3806:19;3846:20,24; 3847:14;3848:5,5,23; 3849:3,8,12,23;3852:7, 11,18;3937:16; 3947:24;3948:4 <b>hours's (1)</b> 3947:17 <b>house (5)</b> 3819:3,8;3820:3; 3881:13,15 <b>household (1)</b> 3908:19 <b>housekeeping (2)</b> 3844:6;3846:7 <b>HR (2)</b>
<b>H</b>				
<b>half (4)</b> 3815:22;3848:5,6; 3852:19 <b>Hall (1)</b> 3878:3 <b>Hallow (7)</b> 3933:2,4,6,18,25; 3936:9;3937:17 <b>Hammer (8)</b> 3927:11,15;3930:6, 24;3931:1,8,11,13 <b>hand (5)</b> 3765:19;3813:5; 3854:11;3902:7; 3934:15 <b>handbook (2)</b>				

NYAG v  
NRA

February 8, 2024

<p>3821:15;3823:8 <b>humbled (1)</b> 3906:15 <b>hundred (2)</b> 3815:22;3840:16 <b>hundreds (13)</b> 3746:13;3748:11; 3749:10;3751:8; 3753:3;3774:21; 3775:3;3777:12; 3778:2;3796:9,9; 3806:19;3902:20 <b>Hunter (1)</b> 3835:13 <b>hunting (1)</b> 3891:7 <b>husband (1)</b> 3911:14 <b>hypothetical (2)</b> 3805:18;3944:4</p>	<p>3849:5;3878:9;3897:7; 3923:5 <b>imported (1)</b> 3829:15 <b>impossible (2)</b> 3736:23;3764:2 <b>improve (2)</b> 3874:8,9 <b>improved (2)</b> 3827:4;3849:17 <b>improvements (2)</b> 3775:9,12 <b>improving (1)</b> 3795:25 <b>inaccurate (1)</b> 3942:17 <b>inadequate (1)</b> 3767:23 <b>inadvertently (1)</b> 3942:14 <b>incentive (2)</b> 3900:11,13 <b>inclined (1)</b> 3845:21 <b>include (2)</b> 3742:20;3848:6 <b>included (5)</b> 3737:6;3775:11; 3790:24;3889:1; 3892:9 <b>includes (2)</b> 3790:9;3873:20 <b>including (14)</b> 3768:20;3791:7; 3797:17;3843:2; 3887:13;3894:25; 3895:16;3904:16; 3906:7;3914:7; 3920:12;3922:16; 3929:8;3941:11 <b>income (1)</b> 3829:5 <b>incomplete (4)</b> 3797:11;3800:24; 3801:6;3942:17 <b>inconsistencies (2)</b> 3771:2,9 <b>inconsistent (1)</b> 3770:21 <b>incorporate (1)</b> 3774:8 <b>incorporated (2)</b> 3748:13;3832:18 <b>incorrect (1)</b> 3928:25 <b>increased (5)</b> 3806:11;3873:15; 3914:22;3939:24; 3941:24 <b>incredibly (2)</b> 3908:4;3923:3 <b>incremental (2)</b> 3801:22,25</p>	<p><b>increments (1)</b> 3818:23 <b>incurred (1)</b> 3928:21 <b>indeed (1)</b> 3929:19 <b>independence (7)</b> 3745:16,20,21; 3777:6;3791:3,8,10 <b>independent (14)</b> 3733:13,16;3745:2, 8;3769:17;3771:14; 3785:14;3794:14; 3795:8,23;3797:16; 3798:8;3804:19; 3943:20 <b>independently (2)</b> 3786:10;3788:17 <b>Indianapolis (1)</b> 3896:25 <b>indicate (1)</b> 3937:13 <b>indicated (1)</b> 3900:1 <b>indicates (2)</b> 3750:7;3802:21 <b>indicating (2)</b> 3759:21;3900:2 <b>indication (1)</b> 3945:2 <b>indications (1)</b> 3786:12 <b>indicators (5)</b> 3796:25,25;3800:11, 21;3801:1 <b>indicia (2)</b> 3786:16,24 <b>individual (6)</b> 3742:24;3848:17; 3851:13,19;3883:12; 3916:5 <b>individually (1)</b> 3816:13 <b>individuals (8)</b> 3752:4;3765:7; 3815:3;3817:2;3824:6; 3826:23;3928:6; 3936:16 <b>industry (1)</b> 3792:22 <b>infirmary (1)</b> 3877:8 <b>inform (4)</b> 3884:8;3920:14; 3943:9,12 <b>information (28)</b> 3731:9;3748:24; 3757:15;3758:5; 3770:10;3782:22; 3794:16;3795:8; 3796:1;3815:1;3816:4; 3818:1;3821:12,12; 3829:23;3837:4;</p>	<p>3838:13;3861:6; 3874:14;3886:24; 3891:1;3903:12; 3904:5;3913:16; 3923:7;3930:22; 3938:14;3942:17 <b>informative (2)</b> 3925:9,10 <b>informed (4)</b> 3803:4;3917:21; 3943:16;3944:9 <b>informing (1)</b> 3943:10 <b>in-house (1)</b> 3828:4 <b>initially (1)</b> 3744:2 <b>initiated (1)</b> 3834:12 <b>initiative (2)</b> 3815:19;3925:18 <b>innocent (1)</b> 3942:11 <b>input (7)</b> 3795:8;3797:15; 3803:6,17;3829:23; 3839:17;3901:17 <b>inputs (1)</b> 3770:11 <b>inquires (1)</b> 3759:2 <b>inquisitive (1)</b> 3814:8 <b>inserted (1)</b> 3737:10 <b>inside (2)</b> 3881:16;3886:20 <b>insiders (1)</b> 3757:7 <b>insignificant (1)</b> 3908:22 <b>insolvencies (1)</b> 3790:25 <b>inspection (1)</b> 3741:6 <b>inspections (1)</b> 3741:13 <b>instance (3)</b> 3819:23;3823:9; 3838:25 <b>instead (2)</b> 3844:13;3851:12 <b>Institute (3)</b> 3740:16;3742:1; 3924:15 <b>instituted (3)</b> 3828:22;3829:12,20 <b>instructed (2)</b> 3818:22,24 <b>instruction (1)</b> 3804:21 <b>instructions (5)</b> 3736:6;3845:14;</p>	<p>3904:14;3947:12; 3948:15 <b>insurance (6)</b> 3739:7;3740:9; 3792:22;3814:24; 3817:5;3864:18 <b>insure (1)</b> 3752:3 <b>insuring (1)</b> 3752:8 <b>integrity (3)</b> 3867:3;3925:23,25 <b>intend (2)</b> 3734:1,4 <b>intending (1)</b> 3730:23 <b>intends (1)</b> 3730:18 <b>Intensity (1)</b> 3806:13 <b>intentionally (1)</b> 3770:9 <b>interact (1)</b> 3924:11 <b>Interactions (1)</b> 3864:19 <b>interest (14)</b> 3745:12;3746:12,15; 3751:4;3781:14,25; 3823:15;3859:22; 3860:1;3884:6,6; 3892:22;3923:12; 3926:16 <b>interested (2)</b> 3824:18;3906:13 <b>interests (1)</b> 3736:7 <b>internal (40)</b> 3732:2,5;3741:5,13; 3744:23;3772:1; 3773:17,22;3774:6,8, 16,17;3782:6;3783:21, 24;3785:13,15; 3787:17;3788:9; 3791:25;3792:15; 3797:3,10;3800:4,14; 3809:4;3810:4,9; 3821:3;3822:1,6,15; 3823:4,10;3827:5; 3831:3,9;3832:7; 3845:1;3888:12 <b>interoffice (2)</b> 3829:2,3 <b>interpret (1)</b> 3734:10 <b>interpreted (1)</b> 3731:5 <b>interview (2)</b> 3877:6,7 <b>into (55)</b> 3731:23;3732:6; 3735:18;3737:3; 3740:7,19,24;3746:25;</p>
<b>I</b>				
<p><b>idea (5)</b> 3730:25;3860:15; 3903:24,25,25 <b>ideas (1)</b> 3736:14 <b>identification (5)</b> 3854:13,15;3930:12; 3932:18;3934:21 <b>identified (4)</b> 3752:11;3808:10; 3810:2;3858:18 <b>identify (2)</b> 3752:10;3823:17 <b>identifying (2)</b> 3795:24;3930:22 <b>ignore (1)</b> 3801:4 <b>ill (1)</b> 3910:1 <b>illness (1)</b> 3889:5 <b>immediately (1)</b> 3827:17 <b>impacts (1)</b> 3787:23 <b>impede (3)</b> 3862:2;3863:1,6 <b>impinging (1)</b> 3947:20 <b>implement (1)</b> 3778:25 <b>implications (2)</b> 3803:23;3804:2 <b>import (1)</b> 3838:9 <b>importance (3)</b> 3844:16;3916:17; 3941:13 <b>important (7)</b> 3798:1;3803:7,12;</p>	<p>3849:5;3878:9;3897:7; 3923:5 <b>imported (1)</b> 3829:15 <b>impossible (2)</b> 3736:23;3764:2 <b>improve (2)</b> 3874:8,9 <b>improved (2)</b> 3827:4;3849:17 <b>improvements (2)</b> 3775:9,12 <b>improving (1)</b> 3795:25 <b>inaccurate (1)</b> 3942:17 <b>inadequate (1)</b> 3767:23 <b>inadvertently (1)</b> 3942:14 <b>incentive (2)</b> 3900:11,13 <b>inclined (1)</b> 3845:21 <b>include (2)</b> 3742:20;3848:6 <b>included (5)</b> 3737:6;3775:11; 3790:24;3889:1; 3892:9 <b>includes (2)</b> 3790:9;3873:20 <b>including (14)</b> 3768:20;3791:7; 3797:17;3843:2; 3887:13;3894:25; 3895:16;3904:16; 3906:7;3914:7; 3920:12;3922:16; 3929:8;3941:11 <b>income (1)</b> 3829:5 <b>incomplete (4)</b> 3797:11;3800:24; 3801:6;3942:17 <b>inconsistencies (2)</b> 3771:2,9 <b>inconsistent (1)</b> 3770:21 <b>incorporate (1)</b> 3774:8 <b>incorporated (2)</b> 3748:13;3832:18 <b>incorrect (1)</b> 3928:25 <b>increased (5)</b> 3806:11;3873:15; 3914:22;3939:24; 3941:24 <b>incredibly (2)</b> 3908:4;3923:3 <b>incremental (2)</b> 3801:22,25</p>	<p><b>increments (1)</b> 3818:23 <b>incurred (1)</b> 3928:21 <b>indeed (1)</b> 3929:19 <b>independence (7)</b> 3745:16,20,21; 3777:6;3791:3,8,10 <b>independent (14)</b> 3733:13,16;3745:2, 8;3769:17;3771:14; 3785:14;3794:14; 3795:8,23;3797:16; 3798:8;3804:19; 3943:20 <b>independently (2)</b> 3786:10;3788:17 <b>Indianapolis (1)</b> 3896:25 <b>indicate (1)</b> 3937:13 <b>indicated (1)</b> 3900:1 <b>indicates (2)</b> 3750:7;3802:21 <b>indicating (2)</b> 3759:21;3900:2 <b>indication (1)</b> 3945:2 <b>indications (1)</b> 3786:12 <b>indicators (5)</b> 3796:25,25;3800:11, 21;3801:1 <b>indicia (2)</b> 3786:16,24 <b>individual (6)</b> 3742:24;3848:17; 3851:13,19;3883:12; 3916:5 <b>individually (1)</b> 3816:13 <b>individuals (8)</b> 3752:4;3765:7; 3815:3;3817:2;3824:6; 3826:23;3928:6; 3936:16 <b>industry (1)</b> 3792:22 <b>infirmary (1)</b> 3877:8 <b>inform (4)</b> 3884:8;3920:14; 3943:9,12 <b>information (28)</b> 3731:9;3748:24; 3757:15;3758:5; 3770:10;3782:22; 3794:16;3795:8; 3796:1;3815:1;3816:4; 3818:1;3821:12,12; 3829:23;3837:4;</p>	<p>3838:13;3861:6; 3874:14;3886:24; 3891:1;3903:12; 3904:5;3913:16; 3923:7;3930:22; 3938:14;3942:17 <b>informative (2)</b> 3925:9,10 <b>informed (4)</b> 3803:4;3917:21; 3943:16;3944:9 <b>informing (1)</b> 3943:10 <b>in-house (1)</b> 3828:4 <b>initially (1)</b> 3744:2 <b>initiated (1)</b> 3834:12 <b>initiative (2)</b> 3815:19;3925:18 <b>innocent (1)</b> 3942:11 <b>input (7)</b> 3795:8;3797:15; 3803:6,17;3829:23; 3839:17;3901:17 <b>inputs (1)</b> 3770:11 <b>inquires (1)</b> 3759:2 <b>inquisitive (1)</b> 3814:8 <b>inserted (1)</b> 3737:10 <b>inside (2)</b> 3881:16;3886:20 <b>insiders (1)</b> 3757:7 <b>insignificant (1)</b> 3908:22 <b>insolvencies (1)</b> 3790:25 <b>inspection (1)</b> 3741:6 <b>inspections (1)</b> 3741:13 <b>instance (3)</b> 3819:23;3823:9; 3838:25 <b>instead (2)</b> 3844:13;3851:12 <b>Institute (3)</b> 3740:16;3742:1; 3924:15 <b>instituted (3)</b> 3828:22;3829:12,20 <b>instructed (2)</b> 3818:22,24 <b>instruction (1)</b> 3804:21 <b>instructions (5)</b> 3736:6;3845:14;</p>	<p>3904:14;3947:12; 3948:15 <b>insurance (6)</b> 3739:7;3740:9; 3792:22;3814:24; 3817:5;3864:18 <b>insure (1)</b> 3752:3 <b>insuring (1)</b> 3752:8 <b>integrity (3)</b> 3867:3;3925:23,25 <b>intend (2)</b> 3734:1,4 <b>intending (1)</b> 3730:23 <b>intends (1)</b> 3730:18 <b>Intensity (1)</b> 3806:13 <b>intentionally (1)</b> 3770:9 <b>interact (1)</b> 3924:11 <b>Interactions (1)</b> 3864:19 <b>interest (14)</b> 3745:12;3746:12,15; 3751:4;3781:14,25; 3823:15;3859:22; 3860:1;3884:6,6; 3892:22;3923:12; 3926:16 <b>interested (2)</b> 3824:18;3906:13 <b>interests (1)</b> 3736:7 <b>internal (40)</b> 3732:2,5;3741:5,13; 3744:23;3772:1; 3773:17,22;3774:6,8, 16,17;3782:6;3783:21, 24;3785:13,15; 3787:17;3788:9; 3791:25;3792:15; 3797:3,10;3800:4,14; 3809:4;3810:4,9; 3821:3;3822:1,6,15; 3823:4,10;3827:5; 3831:3,9;3832:7; 3845:1;3888:12 <b>interoffice (2)</b> 3829:2,3 <b>interpret (1)</b> 3734:10 <b>interpreted (1)</b> 3731:5 <b>interview (2)</b> 3877:6,7 <b>into (55)</b> 3731:23;3732:6; 3735:18;3737:3; 3740:7,19,24;3746:25;</p>

NYAG v  
NRA

February 8, 2024

3748:21;3754:19; 3755:5;3756:15; 3757:16;3759:7,8; 3760:13;3761:4; 3767:11;3775:1; 3791:22;3793:1; 3795:8;3797:15; 3798:7;3802:10,14; 3803:17;3805:11; 3827:8,12;3829:15; 3832:18;3837:5; 3838:4,9;3839:13; 3844:20;3852:7,15; 3856:7;3863:2;3873:1; 3877:15;3878:6; 3881:14;3882:7; 3884:20;3885:9; 3889:15;3925:24; 3931:7;3933:14; 3935:8;3943:17; 3946:21	3772:23 <b>involved (7)</b> 3833:3;3860:23; 3877:1,24;3881:22; 3895:22;3912:3 <b>Irrespective (1)</b> 3787:2 <b>IRS (1)</b> 3834:20 <b>issuance (1)</b> 3743:1 <b>issue (26)</b> 3759:9;3776:25; 3795:21;3797:22; 3800:10,16;3802:25; 3815:9;3816:13; 3819:7;3822:21; 3827:25,25;3834:1; 3844:11,21;3845:5,18, 20;3846:5;3867:5; 3874:23;3902:23,23; 3916:1;3921:11 <b>issued (9)</b> 3732:4;3740:20; 3775:20;3776:11,21; 3778:3;3796:8; 3797:23;3854:25 <b>issues (30)</b> 3730:7,9;3731:6; 3733:17;3759:19,21; 3765:19;3773:1; 3775:17;3781:15; 3801:10;3804:10; 3817:18;3825:5,15,19; 3826:1;3845:5; 3861:17;3883:14; 3885:1,20;3886:22,24, 24;3887:3;3896:10; 3916:5;3923:20; 3926:14 <b>IST (2)</b> 3821:9,11 <b>item (19)</b> 3765:15;3771:7; 3818:17;3821:2,18,18, 22;3822:11,16;3823:7, 13,17;3831:2,13; 3846:8;3855:23; 3859:4,6;3885:6 <b>items (17)</b> 3747:7;3751:5; 3755:24;3765:5; 3771:8;3817:24,24,25; 3818:2;3822:18; 3824:13;3825:7; 3844:21;3855:14; 3874:12,13;3885:2	3930:17 <b>January's (1)</b> 3833:1 <b>Jenkins (2)</b> 3824:17,19 <b>Jesse (2)</b> 3784:20;3808:1 <b>job (19)</b> 3733:14,16;3734:20; 3771:13;3772:24; 3868:5,5,6,8,12,14; 3881:2;3882:19; 3888:13;3892:7; 3894:2;3895:6; 3900:15;3909:20 <b>John (12)</b> 3769:13;3818:13; 3826:24;3840:18,25, 25;3901:6,6,7,11; 3922:9;3924:15 <b>joined (4)</b> 3740:4;3813:20; 3886:19;3904:8 <b>joining (1)</b> 3941:21 <b>jointly (1)</b> 3731:13 <b>joke (1)</b> 3880:25 <b>Josh (8)</b> 3822:9,11,17; 3823:11;3826:13,25; 3831:11,18 <b>Judge (4)</b> 3819:20;3849:11; 3850:4;3934:18 <b>judges (1)</b> 3915:16 <b>judgment (11)</b> 3787:22,23;3823:14, 22;3831:14;3859:14; 3860:5;3903:7,11; 3914:1;3920:14 <b>juggling (2)</b> 3735:21,22 <b>Julia (1)</b> 3878:13 <b>July (8)</b> 3818:10;3827:2; 3831:6,20;3832:4; 3842:6;3857:6; 3874:10 <b>jumped (1)</b> 3767:21 <b>jumps (1)</b> 3735:1 <b>June (1)</b> 3808:10 <b>junior (1)</b> 3839:6 <b>jurisdiction (1)</b> 3895:2 <b>jurisdictions (1)</b>	3896:23 <b>jurors (1)</b> 3736:5 <b>jury (64)</b> 3731:3;3732:17; 3735:8;3738:6,12,13; 3739:5;3741:20; 3742:15;3743:25; 3745:25;3748:4; 3750:4,5,25;3751:2; 3759:25;3760:12,13; 3766:21,25;3771:11; 3781:24;3787:22; 3789:2,3,6,12,13; 3790:5,11;3791:17; 3796:21;3797:13; 3802:13;3803:4; 3812:14;3838:1; 3842:21,22;3844:4; 3846:6;3849:4;3850:9; 3851:7;3852:21; 3853:2,3;3872:22; 3875:22;3877:13; 3883:20,21;3885:10; 3889:24;3892:4; 3897:19;3904:13,18, 22,23;3947:14,15; 3948:14 <b>justices (1)</b> 3915:17	<b>Kiwanis (1)</b> 3915:18 <b>knew (16)</b> 3804:9,12;3816:13; 3825:1,18;3826:1,14; 3899:14,14,15; 3908:20,21;3910:17; 3911:9;3923:14; 3926:9 <b>knowing (3)</b> 3744:7;3803:9; 3923:9 <b>knowledge (22)</b> 3766:4;3784:10; 3805:2;3810:23; 3819:16,24;3820:4,6,7, 9,19;3823:8;3825:24; 3841:10;3859:12,25; 3860:4;3861:9,12; 3862:2,5,15 <b>known (6)</b> 3739:17;3830:8; 3841:14;3891:18; 3904:7;3908:8 <b>knows (2)</b> 3757:13;3825:24 <b>Knox (12)</b> 3911:9,19;3912:2, 23;3913:5,15,18,19,22; 3914:4,6;3938:11 <b>KPMG (3)</b> 3739:17,24;3790:19 <b>KYX's (1)</b> 3829:20 <b>KZSU (1)</b> 3877:4
			<b>K</b>	<b>L</b>
<b>intranet (2)</b> 3760:19;3888:12 <b>introduce (3)</b> 3739:5;3741:20; 3790:4 <b>introduced (1)</b> 3906:6 <b>introduction (1)</b> 3742:4 <b>invasion (1)</b> 3910:25 <b>inverse (3)</b> 3850:15,16;3851:2 <b>investigating (1)</b> 3922:13 <b>investigation (9)</b> 3765:20;3767:12; 3780:18;3802:5; 3810:3;3842:16; 3853:23,25;3854:3 <b>investigations (1)</b> 3791:2 <b>invite (2)</b> 3898:16;3921:5 <b>invited (2)</b> 3897:24;3921:6 <b>invoice (23)</b> 3819:7;3827:23; 3829:15,19;3838:2,12, 14,15,19,24;3839:4,7, 11,13,14,17,19,20; 3840:18;3841:8,16; 3855:3;3917:4 <b>invoices (23)</b> 3799:3,21;3800:21; 3801:16;3815:16,19; 3819:4;3821:23,25; 3826:17;3829:13,17; 3838:4,5,7,7,8; 3839:13;3841:3; 3866:18;3929:3,5,8 <b>involve (1)</b>				<b>LA (1)</b> 3879:8 <b>lack (1)</b> 3766:22 <b>lacking (3)</b> 3751:10;3865:15,18 <b>ladies (2)</b> 3878:7,25 <b>laid (3)</b> 3761:13;3762:3; 3767:5 <b>Lance (1)</b> 3821:22 <b>Langdell (1)</b> 3878:3 <b>L-A-N-G-D-E-L-L (1)</b> 3878:4 <b>language (2)</b> 3808:5;3934:11 <b>LaPierre (52)</b> 3823:24;3826:9,10, 11,25;3831:11,18; 3834:6;3847:2,17; 3851:25;3858:6;

NYAG v  
NRA

February 8, 2024

3860:8,11,13,23; 3861:13,16;3862:2; 3863:1;3864:25; 3900:8;3901:2; 3903:14;3904:2,3,7; 3907:17;3910:6,15; 3912:14,17;3913:4,15, 18,20;3915:5;3916:15; 3918:16;3920:23; 3922:23;3942:6; 3944:18,20,21,23,25; 3945:1,6;3946:4,15,23	<b>layman's (4)</b> 3748:5;3750:4,5,6 <b>leader (2)</b> 3739:7;3740:9 <b>leadership (3)</b> 3814:2,4;3905:20 <b>leading (11)</b> 3749:21;3770:7; 3779:24;3786:18,19; 3817:19;3818:10; 3831:20;3862:8; 3903:17;3942:20 <b>learn (4)</b> 3845:16;3879:22; 3919:3;3943:20 <b>learned (2)</b> 3877:25;3878:1 <b>learners (1)</b> 3915:24 <b>learning (1)</b> 3879:17 <b>lease (1)</b> 3942:24 <b>least (9)</b> 3805:4;3835:16; 3844:17;3850:9; 3888:19;3889:2; 3894:12;3915:15; 3916:9 <b>leave (4)</b> 3791:11;3805:1; 3880:13;3909:18 <b>led (2)</b> 3923:4;3941:20 <b>ledger (6)</b> 3801:11;3829:1; 3836:23;3837:5,10; 3873:21 <b>ledgers (1)</b> 3748:24 <b>leeway (1)</b> 3770:2 <b>left (8)</b> 3802:24;3809:14; 3810:21;3823:11; 3842:22;3853:6; 3879:9;3915:1 <b>legal (15)</b> 3807:2;3883:25; 3890:19;3894:5,8,9,11, 19;3915:19,20;3920:6; 3922:16;3925:3,4,7 <b>legislative (7)</b> 3890:18;3891:11,13, 14,24,25;3924:16 <b>legislature (1)</b> 3884:16 <b>length (2)</b> 3755:9;3825:9 <b>lengthy (1)</b> 3911:16 <b>lenient (1)</b> 3845:12	<b>Leon (1)</b> 3789:23 <b>Lerner (1)</b> 3792:1 <b>less (8)</b> 3802:22;3805:17,20; 3847:7,10;3878:2; 3907:20;3928:14 <b>lesson (2)</b> 3877:25;3878:1 <b>letter (12)</b> 3759:20;3775:16,20; 3776:2,10,23,25; 3777:1;3797:23,25; 3827:21;3878:15 <b>letters (6)</b> 3776:21;3778:3,3, 24;3815:21;3893:19 <b>letting (2)</b> 3786:16,24 <b>level (13)</b> 3754:21;3757:3; 3759:15;3766:22; 3774:7;3780:2;3832:3; 3840:13,15;3866:6; 3906:14;3920:13; 3948:7 <b>levels (2)</b> 3835:8;3888:12 <b>licensing (1)</b> 3793:1 <b>life (2)</b> 3881:20;3885:23 <b>light (1)</b> 3773:9 <b>lights (1)</b> 3819:11 <b>likely (1)</b> 3851:17 <b>likewise (2)</b> 3731:16,17 <b>limit (2)</b> 3737:17;3943:4 <b>limitations (1)</b> 3926:9 <b>limits (1)</b> 3731:12 <b>line (5)</b> 3771:7,8,15; 3817:22;3937:12 <b>Lines (1)</b> 3784:21 <b>liquidate (1)</b> 3914:6 <b>liquidating (1)</b> 3914:12 <b>Lisa (7)</b> 3814:20;3817:5,24; 3824:25;3840:19,19; 3938:3 <b>list (22)</b> 3732:1;3754:15; 3755:2;3756:3;	3800:21;3817:20; 3818:14;3821:9,19; 3822:19;3823:18,19; 3824:12,15;3825:8,8; 3841:22;3859:4; 3889:21;3933:21; 3934:9,22 <b>listed (4)</b> 3815:3;3826:7; 3850:10;3936:17 <b>listen (2)</b> 3736:13;3762:20 <b>listening (5)</b> 3732:13;3735:1; 3742:5;3775:11; 3793:24 <b>listing (3)</b> 3754:13;3760:2; 3821:6 <b>lists (2)</b> 3732:19;3799:20 <b>literally (1)</b> 3735:19 <b>litigation (17)</b> 3747:12;3775:8; 3791:7;3794:20,21,22, 22,23;3796:11; 3800:24;3879:10,13, 13,14,14;3921:25; 3922:1 <b>little (34)</b> 3737:13,15;3741:22; 3753:1;3755:6; 3757:13;3759:6; 3770:2;3783:14; 3794:21;3799:11; 3807:6;3810:15; 3813:13;3815:17; 3829:9;3831:19; 3834:15;3845:9; 3850:1;3851:11,15,18; 3865:11;3874:22; 3875:22;3880:9; 3881:3;3889:24; 3895:24;3896:10; 3902:19;3904:13; 3928:13 <b>live (3)</b> 3876:2;3896:4; 3897:1 <b>lived (2)</b> 3911:2,8 <b>lives (1)</b> 3885:25 <b>living (2)</b> 3881:12;3916:23 <b>LLP (3)</b> 3739:8;3740:4,7 <b>lobbyist (1)</b> 3927:16 <b>local (1)</b> 3926:7 <b>Loeb (10)</b>	3879:7,7,11,11; 3880:1,1,11,11,13,13 <b>long (21)</b> 3735:5;3741:19; 3761:24;3795:5; 3812:20;3846:19; 3847:23;3874:11; 3881:5,8;3890:24; 3893:14,25;3899:14; 3900:19;3904:7; 3906:23;3909:5,7; 3931:11;3934:25 <b>longer (5)</b> 3828:3;3851:18; 3875:1;3909:11; 3915:12 <b>long-range (1)</b> 3890:11 <b>long-standing (1)</b> 3911:4 <b>look (82)</b> 3731:12;3732:14; 3733:5,6,19;3734:19; 3735:17;3737:2,21; 3738:7;3740:20,25; 3741:7;3746:4; 3749:15;3750:16,20; 3751:3;3752:10; 3753:23;3754:8,9,11; 3757:18;3758:4; 3759:12,12,14;3760:6, 23;3762:7,7;3763:20; 3764:6,20;3765:15; 3766:1,25;3768:15,25; 3773:1;3778:23; 3786:12;3801:3; 3802:8;3803:8,8; 3804:3;3818:5;3821:2; 3823:13;3825:11; 3828:18;3829:7; 3838:11,14,22;3845:9; 3852:10;3857:5; 3858:24;3881:24; 3882:8,25;3884:20; 3885:1;3887:24,25; 3888:13;3913:12,15; 3914:16;3919:6; 3922:17;3930:18; 3932:22;3933:1; 3935:17;3937:5; 3946:7 <b>looked (51)</b> 3732:8;3733:7,9,12; 3746:1,14;3747:7,8,9, 10,16,17,18,19,20,21, 23;3748:8;3751:12; 3752:5,14;3755:22; 3756:1,2,5;3757:8,12; 3758:9,17;3760:9,15; 3761:24;3762:16; 3769:10;3772:10; 3773:4;3774:24,25;
--	---	---	--	---

NYAG v  
NRA

February 8, 2024

3786:15,16,23,23; 3787:16;3795:12; 3801:11;3802:17; 3809:7;3858:25; 3913:13;3936:23; 3947:22 <b>looking (25)</b> 3741:2,10;3755:7; 3763:5;3764:23,24; 3766:6;3767:2,20; 3772:23;3775:4; 3778:9,9;3797:18,24, 25;3800:22;3804:8; 3830:10;3845:7; 3847:5;3907:12; 3945:2;3946:21; 3947:25 <b>looks (2)</b> 3732:6;3885:18 <b>Los (2)</b> 3879:7;3881:12 <b>lose (4)</b> 3910:4;3923:17; 3946:6,24 <b>losing (1)</b> 3946:19 <b>lost (2)</b> 3762:18;3829:17 <b>lot (37)</b> 3737:21;3757:21; 3791:3;3795:20; 3798:7;3806:20; 3819:9;3827:6; 3829:25;3842:14; 3848:12;3849:15,19; 3876:7;3879:21; 3890:9,20;3898:18,19; 3903:8;3904:1,4; 3906:3,9;3908:9,19,20, 25;3912:21;3919:6; 3920:12;3923:20; 3924:13;3926:10,10; 3944:23;3948:2 <b>lots (1)</b> 3898:20 <b>loved (2)</b> 3915:9;3941:19 <b>lowest (1)</b> 3906:14 <b>lucky (1)</b> 3885:23 <b>luncheon (1)</b> 3843:5 <b>lying (3)</b> 3770:6,9,19	3824:17,19,20,20,20, 22 <b>magazine (2)</b> 3896:5;3902:19 <b>magnitude (3)</b> 3825:5,15;3826:2 <b>mail (4)</b> 3895:4,5;3896:1; 3902:17 <b>mailed (1)</b> 3829:2 <b>main (1)</b> 3898:12 <b>maintain (4)</b> 3754:21;3759:15; 3791:8,10 <b>major (2)</b> 3879:9,19 <b>majority (2)</b> 3891:22,23 <b>makes (3)</b> 3756:25;3885:17; 3942:11 <b>making (4)</b> 3764:9;3852:17; 3869:12;3907:16 <b>malpractice (1)</b> 3881:1 <b>man (2)</b> 3911:1,9 <b>management (54)</b> 3744:10;3746:22; 3751:14;3752:9; 3753:11;3754:13; 3756:17,24,25; 3758:21;3759:13,18, 20;3760:2;3769:3; 3771:17,19;3775:16, 17,20;3776:2,10,21,23; 3777:3,5;3778:3,4,17, 19,24,24;3779:14; 3780:6;3797:23,25; 3821:3;3822:1; 3823:10,22;3831:3,8, 10,14,17;3832:5; 3834:10;3859:13; 3860:4,20;3865:5; 3887:4;3906:8; 3940:14 <b>management's (1)</b> 3823:14 <b>manager (8)</b> 3818:1;3822:15; 3823:3;3828:12; 3829:7;3839:6,6,8 <b>managers (1)</b> 3823:3 <b>managing (3)</b> 3860:23;3906:7; 3913:20 <b>manner (1)</b> 3750:16 <b>manual (3)</b>	3760:18;3887:14,16 <b>many (25)</b> 3753:6;3765:17; 3783:17;3813:11; 3863:18;3864:12; 3870:25;3885:21,22, 22;3891:19;3893:19; 3898:2,3;3901:17; 3902:24;3906:5; 3910:16;3912:19; 3916:8;3930:10; 3931:1;3933:6,6; 3941:10 <b>March (2)</b> 3797:21;3813:21 <b>Marcum (4)</b> 3739:8,12;3740:7; 3781:8 <b>Marian (1)</b> 3930:6 <b>Marion (1)</b> 3927:11 <b>Marked (7)</b> 3854:13,15;3889:19; 3930:11;3932:17; 3934:21,24 <b>market (2)</b> 3802:10;3943:1 <b>Marketing (2)</b> 3855:15,18 <b>marketplace (3)</b> 3754:20;3755:5; 3804:3 <b>marksmanship (2)</b> 3884:23;3891:6 <b>married (1)</b> 3876:1 <b>Master (1)</b> 3790:17 <b>material (5)</b> 3734:22,23;3750:19; 3754:7;3836:20 <b>materiality (8)</b> 3748:1;3749:2,14, 18;3750:2,6,16,20 <b>materially (2)</b> 3749:8;3770:22 <b>materials (2)</b> 3794:16;3836:4 <b>mathematical (1)</b> 3848:15 <b>matter (12)</b> 3740:15;3806:14; 3844:6;3884:20,24; 3885:1;3888:2;3890:2; 3893:15,17;3903:7; 3926:6 <b>matters (12)</b> 3764:15,18;3765:17, 18;3767:4,10,13; 3845:15;3884:9; 3925:5;3926:4;3933:8 <b>may (38)</b>	3736:15,15;3739:2; 3745:19;3746:18; 3747:3;3752:1; 3767:11;3774:6,8; 3789:24;3792:14,25; 3799:11;3806:11; 3812:9,10;3813:4; 3816:3;3835:10,11; 3836:16;3842:7; 3847:7;3848:11; 3850:1;3853:10; 3862:21;3874:19; 3875:18;3896:7; 3905:4;3923:13; 3926:20;3928:8; 3930:13;3932:10; 3934:15 <b>maybe (18)</b> 3737:25;3741:20; 3796:22;3814:14; 3820:17,23;3847:19; 3848:8;3851:11,15; 3852:13,15;3889:4; 3892:13;3904:3; 3916:9;3948:1,1 <b>McKenna (2)</b> 3826:12,14 <b>McQueen (8)</b> 3826:8;3828:3; 3832:14,17,19;3834:6; 3861:1;3875:1 <b>meals (1)</b> 3929:9 <b>mean (39)</b> 3731:2;3732:3,3,24; 3733:2;3736:25; 3745:9;3753:8; 3754:11;3761:20,24; 3765:3;3797:1; 3801:25;3803:21; 3808:23,23;3815:18; 3819:8,17;3820:21; 3824:22;3825:6,10; 3837:3;3838:5,19; 3846:20;3849:13; 3850:6;3894:22; 3903:6;3921:4,22; 3926:10;3928:21; 3932:9;3934:8; 3941:11 <b>meaning (2)</b> 3834:16;3850:16 <b>means (7)</b> 3733:25;3736:19; 3748:4;3759:25; 3792:10;3804:2; 3895:25 <b>meant (2)</b> 3813:7;3872:23 <b>measurable (1)</b> 3922:2 <b>measures (1)</b> 3895:7	<b>measuring (2)</b> 3800:13,18 <b>meat (2)</b> 3734:6;3747:1 <b>mechanics (1)</b> 3892:3 <b>mechanism (5)</b> 3752:11;3764:7,12, 13;3765:2 <b>media (4)</b> 3886:15,17,25; 3887:1 <b>meet (11)</b> 3814:11;3864:5,6; 3866:19;3894:12; 3896:24,24;3905:18; 3912:21,22;3948:14 <b>meeting (60)</b> 3747:22;3758:16; 3760:8;3764:22; 3815:8;3817:2,15,15, 19,23;3818:10,15; 3824:6,10,14;3827:3,7; 3832:8,12;3834:12,14; 3866:8,24;3871:15,19; 3885:6;3887:2;3888:3; 3889:6;3896:7,13,16, 17,19,22,23,25;3897:1, 2,6,17,20,20,21,22; 3898:5,8,12,12,14,18, 20;3906:20,22; 3921:16;3935:13,15; 3936:24;3937:12,13 <b>meetings (40)</b> 3747:22;3751:21; 3764:19;3765:5,11; 3783:7;3814:17,19,22; 3815:3,4,6,11,12,25; 3818:11;3824:25; 3832:13;3866:9; 3868:20,23;3871:2; 3873:7;3886:5,20; 3897:15,23,25;3898:1, 1,2,6,6,10,13;3917:21, 24;3924:24,25; 3935:21 <b>Mehta (24)</b> 3730:9,14,18; 3738:19,25;3739:6; 3741:23;3743:18,22; 3753:21;3755:14,22; 3758:3;3762:13,21; 3766:15,20;3779:12; 3781:1;3786:7;3788:7; 3791:25;3802:8,19 <b>M-E-H-T-A (1)</b> 3739:1 <b>Mehta's (1)</b> 3734:6 <b>member (35)</b> 3741:17;3744:2,6,7, 11;3783:11;3881:5; 3883:3,9,16,23;3884:1,
<b>M</b>				
<b>ma'am (6)</b> 3818:9;3821:5,21; 3834:22;3835:4; 3872:11 <b>mad (6)</b>				

NYAG v  
NRA

February 8, 2024

4;3887:8;3892:21; 3893:3,5,7;3894:1; 3896:2,3,4;3897:2,3,4, 22;3899:1;3900:25; 3901:8,13;3910:23; 3912:10;3914:2; 3920:8,14	<b>merits (1)</b> 3734:8	<b>minimum (1)</b> 3735:18	<b>mom (1)</b> 3876:5	<b>Moses (1)</b> 3908:5
<b>members (67)</b> 3744:10;3746:21; 3751:14,18;3752:8,9; 3753:10,10;3757:7; 3758:21,21;3759:13, 17,18;3771:18;3783:5, 9;3812:13;3824:10; 3870:8;3872:22; 3884:16;3885:21; 3888:16,20,22;3889:5; 3891:2,5,8,9,16; 3892:10,10,18,18; 3894:18,22;3895:4; 3896:16;3897:17,17, 20,21,25;3898:2,12,16; 3899:6,19,21;3900:17; 3901:3;3902:15,16,25; 3906:22;3911:16,24; 3915:6,7;3929:18,19; 3932:1,6;3941:7,21	<b>mess (1)</b> 3877:8	<b>minute (2)</b> 3736:20;3935:17	<b>moment (3)</b> 3809:15;3810:20; 3868:17	<b>most (13)</b> 3734:22;3741:5; 3753:5,7;3758:23; 3792:8;3878:9; 3884:17;3885:20; 3890:21;3891:15; 3900:19;3918:13
<b>Membership (3)</b> 3855:15,17;3893:1	<b>message (4)</b> 3931:9,11,12; 3933:17	<b>minutes (28)</b> 3747:22;3751:20; 3758:16;3760:7,8; 3763:5;3764:19; 3765:5;3766:20; 3767:3,9,13;3839:22; 3847:12;3848:1; 3851:14;3878:7; 3881:19;3924:23; 3935:5,13;3936:21,23, 24;3937:4,13;3947:23, 25	<b>Monday (2)</b> 3794:1;3947:10	<b>Mostly (3)</b> 3826:24;3878:20; 3886:20
<b>memo (14)</b> 3818:4;3826:7; 3831:5;3842:3,10; 3855:10,14,22,23; 3858:14,21,25;3861:7, 17	<b>met (9)</b> 3814:13;3816:11; 3817:22,22,23;3824:2; 3872:6;3908:10; 3915:7	<b>misappropriating (1)</b> 3785:17	<b>monetary (1)</b> 3785:18	<b>mother (1)</b> 3876:2
<b>men (1)</b> 3878:20	<b>meta (1)</b> 3734:8	<b>mischaracterization (1)</b> 3946:10	<b>money (14)</b> 3794:11;3819:9; 3835:10,11;3836:5,14, 15,21;3916:12; 3927:15,22;3940:15; 3944:24;3945:6	<b>mother's (1)</b> 3908:9
<b>mens (1)</b> 3878:6	<b>metro (2)</b> 3739:7;3740:8	<b>Mischaracterizes (1)</b> 3864:2	<b>monies (1)</b> 3835:14	<b>motion (2)</b> 3811:5;3885:6
<b>men's (1)</b> 3880:7	<b>Michael (3)</b> 3811:19;3812:6; 3852:23	<b>misconduct (10)</b> 3797:2;3923:11,11; 3942:9,12;3943:2,6,18; 3944:2,11	<b>monitor (1)</b> 3918:7	<b>motions (2)</b> 3885:3;3887:21
<b>mental (1)</b> 3825:21	<b>micromanage (2)</b> 3734:19;3851:16	<b>misleading (2)</b> 3770:22;3792:5	<b>monitored (1)</b> 3918:9	<b>move (10)</b> 3749:17;3753:1; 3801:14;3828:5; 3856:7;3889:12; 3918:25;3928:10; 3931:3;3933:10
<b>mention (2)</b> 3803:24;3845:23	<b>mid (3)</b> 3938:8;3939:8,10	<b>mismanaged (1)</b> 3800:19	<b>month (4)</b> 3814:25;3866:10,10; 3928:22	<b>moved (1)</b> 3811:4
<b>mentioned (33)</b> 3731:25;3739:23; 3741:23;3742:4; 3743:22;3745:15; 3751:3;3752:1;3754:5; 3755:25;3756:1; 3759:11;3760:1; 3761:9;3764:23,24; 3771:4;3772:7; 3775:15;3794:19; 3795:11;3806:9; 3872:19;3874:14,14; 3885:10;3890:1; 3895:19;3914:21; 3928:15;3938:7; 3939:23;3940:6	<b>mid-size (1)</b> 3740:5	<b>mismanagement (2)</b> 3802:2;3946:21	<b>monthly (4)</b> 3814:19;3828:23,24; 3837:3	<b>moves (1)</b> 3896:23
<b>merged (1)</b> 3740:7	<b>might (35)</b> 3738:1;3745:17,20; 3754:7,7;3757:25; 3765:19,22;3797:24; 3801:22;3802:21; 3820:22;3828:18; 3829:23;3836:19,21; 3838:20,21;3839:20, 22,23;3884:21,21,22; 3885:3,3;3888:13; 3896:24,24;3898:22; 3903:20;3928:13; 3943:3,21;3945:3	<b>mismanaging (2)</b> 3912:14;3913:1	<b>months (2)</b> 3797:21;3880:14	<b>movie (2)</b> 3908:4,6
	<b>Mike (3)</b> 3838:21,22,23	<b>missed (2)</b> 3889:5;3935:21	<b>more (64)</b> 3738:1;3741:20; 3753:6,19;3755:6; 3757:15,17,21; 3758:17;3759:6; 3761:4,13;3762:3; 3763:8;3766:12; 3768:19;3786:4; 3795:20;3799:18; 3802:21;3805:16,20, 22;3806:21;3814:6; 3819:25;3839:7; 3845:9;3846:7;3849:4, 17,24;3851:11,15,25; 3861:24;3868:4; 3874:19;3879:22; 3884:18;3888:20; 3889:3;3892:3; 3894:12;3895:13,24; 3896:4;3900:21; 3901:15,15;3903:12; 3907:20;3908:24; 3909:23;3910:15,15, 19,19;3916:9;3918:14; 3926:11;3937:11; 3947:5,25	<b>moving (2)</b> 3746:23;3876:3
	<b>mikes (1)</b> 3858:4	<b>missing (2)</b> 3758:22;3767:23	<b>morning (14)</b> 3730:1;3736:16; 3738:7,20;3779:12; 3781:1,2;3789:18; 3790:2,3;3806:6,7; 3934:5;3936:9	<b>much (25)</b> 3757:17,17;3781:8; 3801:1;3806:13,15; 3814:6;3830:25; 3842:18;3847:15; 3848:22;3852:4,7; 3873:25;3875:5; 3879:12;3885:13; 3890:13;3905:2; 3907:21;3926:3,18; 3947:2,7,11
	<b>military (1)</b> 3941:7	<b>mission (4)</b> 3853:18,20;3909:14; 3941:4		<b>multiple (3)</b> 3748:13,19,23
	<b>Millie (2)</b> 3933:2,20	<b>misstatements (1)</b> 3750:8		<b>multiples (1)</b> 3932:14
	<b>million (5)</b> 3750:12,13,16; 3754:6;3815:22	<b>Misstates (1)</b> 3807:15		<b>Museum (7)</b> 3836:1,2,7,8,17; 3837:1
	<b>millions (1)</b> 3748:11	<b>mistake (9)</b> 3942:8,11,12; 3943:2,3,7,17;3944:3, 10		<b>must (4)</b> 3757:3,3;3770:15; 3853:17
	<b>mind (5)</b> 3825:22;3838:16; 3873:14;3929:7; 3942:8	<b>mistaken (1)</b> 3868:13		<b>myself (9)</b> 3814:19;3879:21; 3884:8;3901:24; 3903:19;3920:24; 3925:14;3941:22; 3943:20
	<b>minimize (1)</b> 3764:4	<b>mistakes (2)</b> 3942:14,16		
	<b>minimizes (1)</b> 3764:2	<b>misusing (2)</b> 3785:17,24		
	<b>minimizing (1)</b> 3763:22	<b>MMP (1)</b> 3818:20		
		<b>model (1)</b> 3837:6		

NYAG v  
NRA

February 8, 2024

<p><b>N</b></p> <p><b>name (28)</b> 3738:24,25;3739:6; 3783:9,11;3789:22; 3790:6;3812:5,7; 3820:9;3838:13; 3857:6;3862:23; 3875:16,24;3893:16; 3901:6;3903:20; 3908:6,19;3910:3,9; 3911:1,9;3927:4,5; 3935:19;3938:3</p> <p><b>named (1)</b> 3878:13</p> <p><b>names (11)</b> 3817:6;3892:9; 3897:13;3933:25; 3934:9;3935:19; 3936:5,8,18;3937:9,11</p> <p><b>Nancy (2)</b> 3855:5,6</p> <p><b>Narrative (6)</b> 3741:18;3757:24; 3762:13;3765:22; 3769:20;3830:3</p> <p><b>narrower (1)</b> 3758:3</p> <p><b>narrowly (1)</b> 3758:8</p> <p><b>national (4)</b> 3740:7;3818:18; 3919:4;3935:14</p> <p><b>native (1)</b> 3739:19</p> <p><b>nature (2)</b> 3828:19;3832:2</p> <p><b>Neal (5)</b> 3911:9;3912:2,7,23; 3913:2</p> <p><b>necessarily (5)</b> 3735:3;3810:11; 3850:20;3864:5; 3942:13</p> <p><b>necessary (2)</b> 3810:6;3848:22</p> <p><b>necessitate (1)</b> 3774:17</p> <p><b>neck (1)</b> 3901:14</p> <p><b>need (16)</b> 3730:2;3735:14,15; 3736:22;3738:11; 3777:24;3799:14,25; 3830:10,11;3846:14; 3852:4;3896:3;3913:3; 3925:17;3929:16</p> <p><b>needed (12)</b> 3801:21;3804:18; 3830:15,15;3896:13; 3906:17;3916:21,25; 3919:7;3923:8,24;</p>	<p>3926:13</p> <p><b>needs (2)</b> 3841:1;3946:8</p> <p><b>negotiated (1)</b> 3834:3</p> <p><b>neither (2)</b> 3808:11;3872:12</p> <p><b>new (24)</b> 3735:6;3739:7,9,19; 3740:8;3767:24; 3768:7;3774:2,5; 3780:18;3796:12; 3805:13;3816:8; 3830:20;3842:15; 3855:3;3864:3;3876:5; 3887:20;3911:16; 3912:18;3917:16,18,22</p> <p><b>newspaper (1)</b> 3911:10</p> <p><b>next (32)</b> 3738:17;3747:2; 3775:23;3788:23; 3789:7,15;3801:2; 3811:18;3816:15; 3829:12;3832:16,16, 25;3836:13;3839:25; 3840:21;3841:23; 3843:8;3848:8;3856:8; 3859:6,21;3881:21; 3892:12;3897:6; 3898:25;3902:20; 3921:17;3926:24; 3932:25;3945:9; 3947:10</p> <p><b>nice (2)</b> 3738:10;3942:6</p> <p><b>night (3)</b> 3730:3;3736:22; 3881:14</p> <p><b>nine (8)</b> 3900:15,21;3933:25; 3936:5,8,18;3937:9,11</p> <p><b>ninety (2)</b> 3847:12;3848:1</p> <p><b>nobody (4)</b> 3847:23;3848:23; 3872:25;3883:21</p> <p><b>nominate (1)</b> 3911:21</p> <p><b>nominated (4)</b> 3900:21;3901:4; 3906:19;3911:18</p> <p><b>nominate (2)</b> 3892:11;3905:10</p> <p><b>Nominating (40)</b> 3892:1,4,6,7,11,13, 15;3900:6,8,9,16,17, 22;3901:23,25;3902:1, 6;3903:14,21;3905:7,9, 10,12;3906:19; 3911:18,20,22; 3931:19,21,24;3932:1, 6;3933:21;3934:10;</p>	<p>3936:2,5,13,14,16,19</p> <p><b>nomination (2)</b> 3892:8;3905:17</p> <p><b>nominations (1)</b> 3936:1</p> <p><b>Non-Board (1)</b> 3900:25</p> <p><b>none (3)</b> 3732:19;3805:1; 3889:9</p> <p><b>nonfederal (1)</b> 3834:19</p> <p><b>non-partner (1)</b> 3739:7</p> <p><b>nonprofit (2)</b> 3834:19;3882:23</p> <p><b>non-profit (15)</b> 3731:20;3733:2; 3739:13,14;3740:3,8, 11;3742:2;3743:19,23; 3744:1,3;3746:14; 3751:9;3907:13</p> <p><b>non-profits (8)</b> 3731:21;3774:21,24; 3775:3;3777:17; 3778:12;3779:3; 3907:16</p> <p><b>nontaxable (1)</b> 3834:19</p> <p><b>non-verbal (1)</b> 3917:19</p> <p><b>nor (3)</b> 3730:24;3734:20; 3872:14</p> <p><b>normal (5)</b> 3803:10,10,21,22; 3811:16</p> <p><b>normally (1)</b> 3850:10</p> <p><b>North (4)</b> 3921:3,7,14,20</p> <p><b>note (2)</b> 3730:17;3852:6</p> <p><b>notebook (5)</b> 3858:9,10,13,15,16</p> <p><b>noted (2)</b> 3732:21;3735:11</p> <p><b>notes (3)</b> 3756:23;3796:9; 3816:1</p> <p><b>not-for-profit (5)</b> 3739:25;3740:5; 3808:12,17;3810:24</p> <p><b>not-for-profits (6)</b> 3753:3,5;3761:19; 3762:5;3806:25; 3807:9</p> <p><b>notice (6)</b> 3754:23;3761:10; 3854:2,22,25;3924:25</p> <p><b>notices (1)</b> 3924:24</p> <p><b>not-profit (1)</b></p>	<p>3749:20</p> <p><b>November (1)</b> 3832:20</p> <p><b>NRA (283)</b> 3730:10,17;3733:7; 3735:12,25;3737:5; 3738:18;3739:15; 3742:13;3743:11; 3744:23;3746:8; 3747:9;3748:7,15; 3749:1;3750:11; 3752:5,15;3753:19,23; 3755:23;3757:11,14; 3758:4,11,20;3760:15, 20;3761:12;3762:23, 24;3764:21;3766:5; 3768:20;3769:10; 3771:12;3773:21,21, 25;3774:12,13,15,23; 3775:5;3776:22; 3778:10,10,14; 3780:15;3781:3,8,18; 3782:9,22;3783:23; 3785:15;3786:16,24; 3789:17;3791:16,18; 3793:4;3794:9; 3795:12;3800:5; 3801:17,22;3802:14; 3803:10,20,23,24; 3805:20;3806:14; 3807:3,4,4,7;3809:20; 3810:1;3811:19; 3812:18,19,20,21; 3813:14;3816:9; 3820:1;3825:13; 3826:7,16;3827:4,21; 3828:3;3832:9,14; 3834:1,3,4,21,23,25; 3835:5,7,16;3836:1,22; 3838:21;3839:12; 3841:24;3846:11; 3847:5,11;3848:18; 3850:10;3851:14; 3853:17;3855:6,17; 3863:2,9,15;3866:2; 3869:7,10,18;3874:7; 3875:12;3881:6,9; 3883:2,3,7,9,13; 3884:4,19,21;3885:11, 22;3886:1,9,19;3887:4, 19,22;3888:4,12; 3889:10,17,25; 3890:16;3891:5,15,16, 17,23,25;3892:4,6,10, 14,21,22;3893:1,3,5,7, 18;3894:3,19,21,23; 3895:25;3896:3,15; 3897:2,4,12,22,24,25; 3898:2,14;3899:1,8; 3900:9,16;3901:1,8,9; 3902:22;3903:3; 3906:4;3907:5,7,12,23; 3908:2,10,11,18,20,23,</p>	<p>24;3909:14,17,20,25; 3910:8,17,19,20,23; 3911:6,11;3912:8,9,11, 13,15;3913:10,23; 3914:11,11,22,25; 3915:7;3916:16; 3917:1,13,18;3918:4,7, 12,17;3919:2;3920:1, 16;3921:15;3922:15; 3923:5,12,19;3924:12, 16,16,19,22;3925:2,5; 3927:9,13,15,19,22; 3928:12;3933:5,7,8; 3938:14;3939:2,20,25; 3940:6,14;3941:1,11, 17,18,21,24;3944:17, 19,22,24,24,25;3945:3, 7;3946:20,25</p> <p><b>NRA's (61)</b> 3732:2;3737:15; 3746:4;3748:10,12; 3751:1;3753:4,22; 3757:5;3758:25; 3760:10;3761:17; 3762:6;3764:15,20,25; 3765:1;3767:16; 3769:6;3774:19; 3777:16,22;3778:11, 24;3779:23;3781:13, 24;3782:6,12,19; 3783:2,19;3784:23; 3785:12;3786:8; 3788:15;3793:17; 3794:17;3797:17; 3810:4,8;3817:9; 3831:21;3832:18,23; 3833:2;3853:18,20; 3874:24;3881:25; 3891:1;3892:19; 3898:21;3909:2; 3917:9;3926:14,16; 3938:7;3939:7;3941:4; 3946:21</p> <p><b>number (28)</b> 3739:18;3740:1; 3751:5;3752:5; 3760:17;3771:6; 3774:20;3783:18; 3808:24;3818:17; 3823:17;3836:2,12; 3877:14;3888:10; 3890:3,17;3891:14; 3899:13;3915:17; 3932:20,21,22,24,25, 25;3933:1;3936:17</p> <p><b>numbered (4)</b> 3880:7,8;3882:9,10</p> <p><b>numbers (4)</b> 3795:19,21;3835:24; 3933:15</p> <p><b>NYAG (1)</b> 3747:9</p> <p><b>NYAG's (1)</b></p>
---	---	--	--	--

NYAG v  
NRA

February 8, 2024

3853:22	<b>obvious (1)</b> 3734:22	<b>OFFICER (15)</b> 3738:12;3739:3; 3789:2,12;3811:20,23; 3842:21;3853:2; 3904:22;3905:14,20; 3914:24,25;3932:12; 3947:14	3838:10;3840:12; 3846:7,12;3847:19; 3848:1,3;3849:14; 3851:23;3852:11; 3855:14;3858:16,19; 3863:19;3873:4; 3877:4;3879:20; 3881:19;3882:2; 3883:9;3886:7; 3887:19,20;3889:5,6; 3893:23;3895:13; 3896:24,24;3897:5; 3898:7,7,8;3900:24; 3903:3,6;3912:3; 3916:2;3921:14; 3922:16;3923:3,10,14; 3925:18;3926:1; 3932:14;3933:20; 3946:23,23;3948:1	<b>opinion (58)</b> 3731:22,23,24; 3732:4,18;3733:24,25; 3734:6,6;3735:6; 3744:22;3749:4,12,12; 3750:25;3751:2; 3755:23;3756:20; 3760:14;3766:2; 3767:1,17,18;3769:24; 3773:2,12,13;3774:15, 20;3776:3,5;3779:21; 3780:2,17;3781:13,17, 21;3782:5,12,25; 3783:19;3784:6,11; 3795:8;3797:16; 3801:7;3805:3; 3806:20;3807:13; 3810:7;3811:4;3814:2; 3823:9;3825:21; 3883:25;3903:16; 3920:6;3926:17
<b>O</b>	<b>obviously (7)</b> 3732:13;3762:9; 3769:6;3819:5; 3848:18;3932:21; 3933:24	<b>officers (13)</b> 3746:21;3751:14; 3753:11;3806:25; 3826:18;3887:4,5,6,12; 3892:12;3905:22; 3907:4,7	<b>ones (4)</b> 3736:12;3775:8; 3871:8;3907:19	<b>Opinions (22)</b> 3734:7,9,14; 3744:16;3746:1,11; 3747:1,8,19,24; 3750:22;3755:20; 3766:22;3781:22; 3782:19;3784:15; 3787:4;3796:12,15,20; 3803:4;3931:13 <b>opportunities (1)</b> 3926:11
<b>Oakland (1)</b> 3877:5	<b>occasion (3)</b> 3826:19,25;3924:11	<b>officers' (1)</b> 3841:1	<b>one-year (2)</b> 3908:12;3909:9	<b>opportunity (9)</b> 3778:20;3791:11; 3795:3;3814:1; 3847:17;3885:7; 3893:12,18;3894:16
<b>oath (1)</b> 3784:18	<b>occasions (1)</b> 3931:22	<b>official (1)</b> 3889:17	<b>ongoing (2)</b> 3830:16,16	<b>opposed (1)</b> 3887:1
<b>object (4)</b> 3819:20;3883:25; 3885:19;3946:10	<b>occur (3)</b> 3765:23;3832:10; 3923:16	<b>official (1)</b> 3889:17	<b>only (23)</b> 3736:12;3756:19; 3796:25;3797:15; 3800:10;3801:3; 3803:9;3824:12; 3835:9,18;3836:25; 3845:14;3851:19; 3856:1;3858:19; 3861:3,15;3893:24; 3895:14;3900:16; 3909:9;3912:22; 3935:21	<b>opposing (1)</b> 3886:12
<b>Object (57)</b> 3741:18;3743:20; 3749:21;3755:13; 3757:24;3762:12; 3765:22;3769:20; 3770:7;3772:11,16; 3773:10,23;3776:12; 3777:18;3779:24; 3786:18;3793:6; 3797:6;3799:4,15; 3800:1,15;3803:13; 3804:11;3805:6; 3807:15;3819:15; 3822:2,23;3825:16,20; 3826:3;3831:25; 3835:2;3855:19; 3856:7;3859:16; 3862:8,17;3882:3,4; 3889:9,11;3903:17; 3913:25;3914:14; 3920:5;3927:24; 3931:4;3933:11; 3935:4;3937:1; 3942:20;3944:4,12; 3946:13	<b>occurred (3)</b> 3828:16;3842:12; 3861:10	<b>often (14)</b> 3792:6,12;3827:1; 3849:17;3886:5; 3887:24;3888:21; 3892:17,23;3894:13; 3900:21;3903:24; 3910:8;3918:16	<b>open (3)</b> 3913:12;3916:23; 3947:24	<b>opposite (4)</b> 3850:7,21;3862:5,15
<b>objections (1)</b> 3934:25	<b>occurs (2)</b> 3898:18;3934:5	<b>OGC (1)</b> 3841:13	<b>opening (2)</b> 3846:25;3850:15	<b>order (15)</b> 3744:22;3759:18; 3808:2,4;3846:15; 3850:4,11,12,15; 3851:1;3896:2; 3916:25;3936:17; 3937:22;3938:13
<b>objective (1)</b> 3794:15	<b>odd (1)</b> 3880:7	<b>old (2)</b> 3868:12,14	<b>openings (1)</b> 3850:7	<b>ordered (4)</b> 3839:3,12;3840:3; 3841:18
<b>Objectives (5)</b> 3883:2,5;3886:2; 3892:19;3941:4	<b>Odessa (1)</b> 3876:6	<b>older (3)</b> 3879:22;3915:23; 3926:10	<b>operates (1)</b> 3883:13	<b>ordinary (4)</b> 3768:17;3787:3,7,10
<b>objectivity (1)</b> 3791:3	<b>off (18)</b> 3750:12;3754:5; 3810:21;3817:22,22; 3818:20,22;3829:1; 3839:10;3840:19,22, 24,25;3841:20;3853:6; 3897:9;3913:23; 3942:24	<b>Ollie (1)</b> 3921:3	<b>operating (1)</b> 3782:13	<b>organization (39)</b> 3740:14;3741:24; 3744:3,9;3745:14; 3748:10,12,16,16,17, 25;3749:1,16;3751:6; 3752:2;3754:19; 3757:20;3763:23,25; 3772:2,5;3773:6;
<b>obligation (2)</b> 3884:8;3943:20	<b>offer (9)</b> 3731:1;3743:18; 3765:9;3782:25; 3793:4;3807:13,22; 3880:15,17	<b>Olson's (1)</b> 3821:23	<b>operating (1)</b> 3782:13	
<b>obligations (3)</b> 3744:11;3884:12; 3943:8	<b>offered (4)</b> 3765:6;3808:17; 3810:23;3811:1	<b>once (14)</b> 3752:11;3769:4; 3822:20;3823:18; 3824:24;3832:6; 3839:16;3840:24; 3883:15;3888:19; 3889:3;3895:14; 3920:25;3931:25		
<b>observations (2)</b> 3925:22;3926:2	<b>offering (10)</b> 3731:6;3733:24; 3781:12,21;3782:5,12; 3783:19;3784:6,11,15	<b>one (104)</b> 3734:16,19;3736:5, 6;3737:12,18;3739:17, 17;3740:2,13;3744:5; 3745:17;3746:3,6,6; 3747:3;3749:14; 3751:6,10,12;3754:16; 3756:6,20;3757:2; 3760:13;3762:3,9,9; 3764:8;3768:20; 3772:22;3776:10; 3777:23;3779:25; 3787:15,16,17;3789:9; 3790:18;3791:5; 3793:1;3794:14; 3796:23;3803:24; 3815:7,8;3816:13; 3819:25;3822:20; 3825:7,10;3827:17; 3828:22;3829:23;		
<b>observe (2)</b> 3827:9;3895:17	<b>offers (1)</b> 3793:4			
<b>observed (1)</b> 3819:18	<b>office (42)</b> 3747:9;3751:25; 3761:6;3764:14,16; 3769:14;3774:14; 3775:8;3796:12; 3815:6;3817:23; 3828:9;3839:23; 3840:21;3841:7; 3887:23,25;3888:1; 3894:23;3905:17; 3906:15,18;3909:3; 3911:3,17;3913:7,9; 3916:16,21,23;3917:2; 3921:19;3925:5,20; 3926:4;3927:6;3929:4; 3938:14,16,17,18,19			
<b>obtain (7)</b> 3740:19;3751:13; 3754:13,19;3760:1,3; 3925:4				
<b>obtained (3)</b> 3751:23;3755:2; 3756:3				

NYAG v  
NRA

February 8, 2024

<p>3774:9;3777:7;3801:3, 4;3813:20;3815:10; 3834:17,18,20,23,24; 3908:22,24;3910:3,4; 3943:12,15</p> <p><b>organizations (15)</b> 3739:13,14,15; 3740:3,11;3744:2; 3746:14;3748:19,20; 3751:9;3774:6,8; 3907:13,18,19</p> <p><b>organization's (3)</b> 3761:8;3768:18,25</p> <p><b>organized (3)</b> 3815:12;3824:25; 3873:7</p> <p><b>original (1)</b> 3841:8</p> <p><b>originally (1)</b> 3876:1</p> <p><b>originated (1)</b> 3839:3</p> <p><b>originator (1)</b> 3841:16</p> <p><b>others (9)</b> 3791:22;3805:4; 3815:24;3817:20; 3825:1;3827:17; 3871:5,7;3926:13</p> <p><b>otherwise (2)</b> 3766:15;3886:9</p> <p><b>ought (1)</b> 3902:2</p> <p><b>ours (1)</b> 3907:20</p> <p><b>out (70)</b> 3735:1,22;3737:20; 3744:11;3745:18,22; 3748:14,18,19,24; 3754:18,19,22;3755:5, 12;3756:11,13; 3761:13;3767:5,7,21; 3768:17;3770:16,16; 3771:6,22;3793:14; 3796:23;3802:9,19; 3803:2;3805:1;3816:6; 3817:11;3819:6; 3826:15;3827:21; 3828:5,5,9,24;3829:2; 3832:10,15;3836:20; 3849:7,21;3852:13; 3867:5;3872:10; 3874:22;3878:19; 3881:2;3883:17; 3886:10,11;3892:10; 3893:17;3900:2; 3910:3,8;3911:15; 3914:25;3915:7; 3918:25;3922:17; 3923:11;3930:2; 3937:22;3947:25</p> <p><b>outlined (1)</b> 3760:17</p>	<p><b>outlines (2)</b> 3771:24;3777:1</p> <p><b>out-of-pocket (1)</b> 3828:2</p> <p><b>outreach (2)</b> 3884:22;3941:16</p> <p><b>outside (18)</b> 3732:21;3755:14; 3769:16;3774:15; 3777:18;3783:2; 3795:25;3800:24; 3803:18;3807:7; 3828:4;3855:19; 3892:21;3894:3,14; 3907:15;3921:8; 3927:24</p> <p><b>outsiders (1)</b> 3900:18</p> <p><b>over (45)</b> 3739:14;3740:6,10, 23;3741:16;3746:14; 3778:4;3791:11; 3795:6;3813:22,24; 3814:13;3818:22; 3826:17;3827:18,18; 3829:24;3830:17,17, 17;3833:3;3836:5,14, 21;3840:16,22;3841:5, 6;3847:10;3858:3; 3866:19;3870:13,22; 3884:18;3887:12; 3890:17,21;3906:25; 3907:3;3909:1;3912:9; 3917:23;3922:12,12; 3931:2</p> <p><b>overall (4)</b> 3742:18;3748:25; 3772:7;3894:9</p> <p><b>overarching (1)</b> 3835:9</p> <p><b>overhead (1)</b> 3916:21</p> <p><b>overridden (1)</b> 3821:8</p> <p><b>override (5)</b> 3821:3;3822:3; 3823:2;3831:3,8</p> <p><b>overrides (1)</b> 3822:1</p> <p><b>overriding (1)</b> 3823:10</p> <p><b>overrode (4)</b> 3822:6,7,15;3823:4</p> <p><b>Overruled (24)</b> 3762:17;3770:8; 3773:24;3777:25; 3779:25;3786:21; 3797:8;3799:6;3800:2, 17;3803:15;3804:13; 3822:5,24;3830:4; 3835:3;3855:24; 3862:9,17;3864:4; 3884:1;3914:15;</p>	<p>3942:23;3946:13</p> <p><b>oversees (1)</b> 3894:21</p> <p><b>oversight (3)</b> 3882:14;3887:11; 3894:8</p> <p><b>overview (3)</b> 3748:9;3834:13; 3851:15</p> <p><b>Overwhelmingly (1)</b> 3924:13</p> <p><b>own (25)</b> 3735:15;3736:7; 3741:10;3769:7; 3773:13;3782:21,24; 3797:16;3799:2; 3819:5;3833:1;3839:8; 3874:24;3877:23; 3881:21;3884:6,11; 3903:11;3904:5; 3909:1;3916:5;3928:3; 3941:14,14;3946:12</p> <p><b>owned (1)</b> 3819:6</p> <p><b>owner (4)</b> 3838:15,19,24; 3881:11</p> <p><b>owners (1)</b> 3908:25</p> <p><b>ownership (2)</b> 3745:12;3916:7</p>	<p>3819:8;3887:6,12; 3907:7,19,20;3916:10; 3918:8;3928:6,16,18; 3929:1;3940:16; 3944:1,9,18,19,21,23, 24;3945:3,8</p> <p><b>pamphlet (4)</b> 3882:9,10;3883:1; 3889:20</p> <p><b>panel (1)</b> 3916:3</p> <p><b>paper (3)</b> 3737:17;3785:10; 3828:25</p> <p><b>papers (10)</b> 3732:6,21;3733:10, 13;3740:21,25; 3747:16;3785:5; 3795:1;3891:18</p> <p><b>paperwork (2)</b> 3820:10;3912:24</p> <p><b>paragraph (2)</b> 3935:25;3936:12</p> <p><b>parallel (1)</b> 3832:13</p> <p><b>parcel (1)</b> 3763:15</p> <p><b>part (26)</b> 3733:17;3735:4; 3740:14;3760:25; 3763:14;3768:24; 3772:8;3776:5; 3791:17,20,21; 3796:11;3797:23; 3830:13;3845:2; 3849:11;3851:19; 3859:21;3886:7; 3891:17,17,19; 3893:11;3902:12; 3920:22;3922:6</p> <p><b>participate (1)</b> 3890:10</p> <p><b>participated (2)</b> 3740:23;3834:4</p> <p><b>particular (27)</b> 3741:2;3745:18; 3746:11;3751:24; 3752:1;3755:1;3756:4; 3761:2,5,15;3765:3; 3768:13;3769:19; 3770:13,15;3771:6,6; 3822:21;3828:6,12; 3836:16;3838:15; 3839:10;3886:4; 3888:2;3894:11; 3909:3</p> <p><b>parties (1)</b> 3747:11</p> <p><b>partner (8)</b> 3739:7;3742:14,15, 17;3791:5;3880:2,3,11</p> <p><b>Partners (2)</b> 3855:15,18</p>	<p><b>party (4)</b> 3755:4;3758:13,20; 3884:7</p> <p><b>party's (1)</b> 3737:18</p> <p><b>Pass (9)</b> 3779:5;3786:2; 3788:1;3805:24; 3810:13;3837:15; 3923:25;3937:19; 3942:1</p> <p><b>passed (3)</b> 3777:5;3887:19,22</p> <p><b>past (11)</b> 3737:11;3742:6; 3800:8,9;3819:14; 3910:16;3927:9,13,17, 19,23</p> <p><b>pasting (1)</b> 3735:20</p> <p><b>path (1)</b> 3946:7</p> <p><b>pay (7)</b> 3743:11;3818:22; 3923:16;3941:17; 3942:24,25;3943:25</p> <p><b>payable (5)</b> 3818:1,17,22; 3821:9;3873:20</p> <p><b>payables (1)</b> 3818:20</p> <p><b>paying (2)</b> 3794:9;3801:4</p> <p><b>payment (7)</b> 3754:23;3801:12; 3821:25;3826:15,16; 3840:14;3917:15</p> <p><b>payments (13)</b> 3819:2,14;3820:2,5; 3826:20;3837:23; 3838:2,3,5;3928:4; 3929:11,22;3930:3</p> <p><b>pays (2)</b> 3794:8;3944:7</p> <p><b>PDF (2)</b> 3838:4,9</p> <p><b>peephole (1)</b> 3881:16</p> <p><b>peer (4)</b> 3740:15,25;3741:9, 13</p> <p><b>pending (2)</b> 3799:16;3935:23</p> <p><b>people (75)</b> 3783:17;3792:8; 3803:24;3804:3,12,24; 3806:16;3813:11; 3819:20;3823:11; 3830:17,23;3834:5; 3863:18;3864:12; 3867:18;3879:22; 3885:15,23,24; 3886:11,23;3887:1;</p>
<b>P</b>				
		<p><b>pace (1)</b> 3855:10</p> <p><b>package (4)</b> 3768:2,6,9,9</p> <p><b>packet (1)</b> 3768:6</p> <p><b>Padilla (1)</b> 3817:25</p> <p><b>page (34)</b> 3737:17;3752:17; 3756:20;3775:23; 3776:1;3784:20; 3798:10;3816:15; 3818:6;3831:1;3833:5; 3843:8;3856:8;3859:6; 3876:12;3882:8,9,10, 10,25;3883:1;3889:7, 19,20;3898:25;3919:8; 3926:24;3931:12,13; 3935:10,24,25; 3936:11;3945:9</p> <p><b>pager (1)</b> 3758:24</p> <p><b>pages (9)</b> 3736:12;3758:22; 3795:6;3796:9; 3934:23,23;3937:1,2,5</p> <p><b>paid (26)</b> 3794:4,4,5,10;</p>		

NYAG v  
NRA

February 8, 2024

3890:1,6,7,9,14,15; 3891:9,15;3897:7,8,11, 16;3898:22;3899:1,13, 18;3900:3,15,18,18,20, 21,23,24;3901:17; 3902:1,20,21;3903:3,9, 15,24;3904:1;3905:10; 3908:20,23;3909:1; 3912:13,19,21;3913:7; 3915:10;3916:4; 3918:15,24;3921:5; 3922:15;3923:10,14; 3931:16;3941:10; 3943:12	<b>person (28)</b> 3810:19;3826:6; 3829:16;3837:22; 3838:25;3839:2,2,4,16, 25;3840:12;3866:13; 3892:24;3893:8,16,18; 3897:5;3901:8,10,12, 15;3903:3,9,10,21,22; 3909:13;3923:22	3877:10;3899:18; 3900:5,8,15;3905:9,12	3947:11;3948:10	17,17;3887:14,16,25; 3888:2,16;3891:11,13, 24
<b>per (1)</b> 3916:8	<b>personal (18)</b> 3742:2;3794:13; 3805:2;3815:15; 3819:24;3825:24; 3828:18;3859:12,25; 3860:4;3861:9;3862:1, 5,15;3875:22;3884:11; 3930:21;3945:7	<b>picked (2)</b> 3899:23;3905:8	<b>pleased (1)</b> 3920:21	<b>political (8)</b> 3803:23;3805:14; 3891:17,17,24; 3908:24;3915:18; 3924:16
<b>percent (8)</b> 3739:13;3749:5; 3775:7,10,14;3779:4; 3780:15;3878:2	<b>personally (8)</b> 3814:11;3816:7; 3821:19;3823:17; 3867:13;3902:21; 3903:20;3930:22	<b>picture (4)</b> 3748:25;3829:5; 3873:2,6	<b>plethora (1)</b> 3886:23	<b>pop (1)</b> 3839:19
<b>percentage-wise (1)</b> 3779:2	<b>persons (1)</b> 3826:6	<b>piece (6)</b> 3737:17;3793:22; 3798:7;3849:23; 3873:1;3923:7	<b>Plotts (9)</b> 3742:12;3743:4; 3745:1;3750:15; 3759:23;3772:8,19; 3775:19;3797:19	<b>portfolio (3)</b> 3914:7;3939:24; 3940:3
<b>Perfect (1)</b> 3948:16	<b>perspective (3)</b> 3748:5;3770:21; 3794:18	<b>pieced (1)</b> 3825:2	<b>PM (4)</b> 3818:18,19;3826:10; 3937:13	<b>Portia (1)</b> 3817:25
<b>perform (15)</b> 3740:14;3741:1; 3755:14;3771:19; 3773:6,6;3774:3,5,17; 3782:21,24;3788:9,12; 3803:14;3898:19	<b>pertinent (1)</b> 3829:24	<b>pieces (3)</b> 3872:24,25;3873:8	<b>PM3 (1)</b> 3855:4	<b>portion (4)</b> 3820:10;3830:14; 3849:13;3935:3
<b>performance (1)</b> 3908:17	<b>petition (5)</b> 3905:16,16,19; 3911:20,22	<b>pistol (1)</b> 3890:10	<b>PN3 (8)</b> 3829:12,12,15,15,18; 3838:9;3841:20; 3874:3	<b>position (17)</b> 3737:10,11,15,19; 3812:18,25;3813:14; 3825:14;3826:19; 3839:16;3863:15; 3868:3;3884:10; 3888:13;3905:14; 3918:1;3923:2
<b>performed (9)</b> 3730:13,21;3740:24; 3741:3,11;3773:4,9; 3775:3;3788:16	<b>petitions (2)</b> 3905:17;3911:19	<b>place (25)</b> 3740:17;3751:15; 3752:16;3753:8,9,16, 20;3758:5;3760:6,25; 3769:3;3774:16; 3775:5;3781:14,17; 3832:14;3837:5; 3842:11;3863:2; 3873:3;3874:4;3895:7; 3910:22;3917:22; 3937:8	<b>Point (19)</b> 3739:4;3750:8; 3761:2;3765:8;3780:8; 3796:23;3805:6; 3812:22;3819:22; 3820:24;3839:5,5; 3844:11;3848:14; 3849:20;3852:3; 3865:9;3874:25; 3924:19	<b>positions (4)</b> 3894:4;3905:20,21; 3912:8
<b>performing (7)</b> 3740:22;3741:13; 3751:5;3759:22; 3763:17,20;3774:1	<b>Phillips (33)</b> 3735:20,21;3814:5, 9,10,12,14;3818:25; 3823:5,24;3825:18; 3826:1,9,10,11,24; 3831:11,18;3834:7; 3846:21;3847:4,6; 3862:24;3863:6,21; 3864:1;3866:13; 3868:18;3938:4; 3939:10,19,20;3940:2	<b>placed (1)</b> 3774:12	<b>points (4)</b> 3732:1;3761:4; 3795:17;3885:22	<b>positive (1)</b> 3908:19
<b>perhaps (1)</b> 3913:13	<b>Phillips' (2)</b> 3822:9;3865:5	<b>places (2)</b> 3732:9;3876:7	<b>police (2)</b> 3877:6;3881:18	<b>possibility (3)</b> 3763:18,22;3797:1
<b>period (15)</b> 3761:24;3774:25; 3780:19;3813:13; 3818:22;3827:18; 3842:3;3845:12,16; 3869:1;3906:24; 3908:9;3909:3; 3915:14;3917:23	<b>Phillip's (1)</b> 3934:22	<b>Plaintiff (5)</b> 3731:1;3734:2; 3850:8,13,17	<b>policies (42)</b> 3744:21;3746:4; 3747:12,15;3753:22; 3756:2;3762:4,11,16; 3764:20;3767:5,7; 3774:11;3775:5; 3781:13,17,20,25; 3782:2,6;3785:10; 3786:8,12,17,24; 3795:1;3810:9;3821:7, 10;3827:5;3830:9; 3874:18;3882:13; 3887:15,19,20,21; 3888:11,14,21; 3917:17;3923:8	<b>possible (3)</b> 3749:9;3892:8; 3941:24
<b>periodic (1)</b> 3753:14	<b>Phoenix (1)</b> 3910:25	<b>plan (1)</b> 3849:20	<b>planned (1)</b> 3746:18;3747:13,14; 3751:7,10,11,22; 3752:3,4,15;3753:8,9, 16,17,19;3759:12,14; 3760:16,16,18,21,23; 3761:3,5,8,10,13; 3762:1,2,4,6,7,9,15,23; 3763:13,14,24;3764:1, 5,6,7,7,25,25;3765:4; 3801:23;3809:20; 3810:1;3821:14,15,15; 3827:22;3830:20,21, 22;3874:21;3883:16,	<b>possibly (1)</b> 3800:10
<b>periodically (3)</b> 3741:8;3765:9; 3917:23	<b>phone (2)</b> 3829:7;3902:21	<b>plane (1)</b> 3921:16	<b>post-whistleblowing (1)</b> 3842:2	<b>potentially (1)</b> 3745:16
<b>periods (1)</b> 3845:17	<b>phrases (1)</b> 3796:3	<b>Planet (1)</b> 3908:8	<b>potential (3)</b> 3751:23;3752:10; 3753:17	<b>pounded (1)</b> 3881:15
<b>periphery (1)</b> 3750:1	<b>phrased (1)</b> 3778:18	<b>planning (4)</b> 3847:18,18;3850:25; 3852:13	<b>potentially (1)</b> 3745:16	<b>powder (3)</b> 3890:3,7,8
<b>permitted (1)</b> 3731:11	<b>physical (1)</b> 3735:22	<b>play (1)</b> 3889:25	<b>potentially (1)</b> 3745:16	<b>Powell (7)</b> 3822:9,17;3823:11; 3826:13,25;3831:12,18
<b>persistent (1)</b> 3782:2	<b>physically (1)</b> 3938:15	<b>plays (2)</b> 3731:23;3802:13	<b>potentially (1)</b> 3745:16	<b>Powell's (1)</b> 3822:11
	<b>pick (9)</b> 3760:3;3873:4;	<b>Please (25)</b> 3738:15;3739:5; 3741:19;3784:20; 3789:15;3790:4; 3797:13;3808:1; 3812:17;3818:15; 3827:11;3832:2; 3853:5;3855:25; 3856:4;3858:8;3859:6; 3872:22;3873:14; 3905:2;3926:22; 3937:20;3946:12;	<b>policy (68)</b> 3746:18;3747:13,14; 3751:7,10,11,22; 3752:3,4,15;3753:8,9, 16,17,19;3759:12,14; 3760:16,16,18,21,23; 3761:3,5,8,10,13; 3762:1,2,4,6,7,9,15,23; 3763:13,14,24;3764:1, 5,6,7,7,25,25;3765:4; 3801:23;3809:20; 3810:1;3821:14,15,15; 3827:22;3830:20,21, 22;3874:21;3883:16,	<b>powerful (1)</b> 3911:13

NYAG v  
NRA

February 8, 2024

3882:12 <b>PR (1)</b> 3833:3 <b>practice (6)</b> 3740:5;3763:12; 3778:25;3845:3; 3916:24;3918:23 <b>practices (3)</b> 3744:23;3753:23; 3764:15 <b>practicing (4)</b> 3880:23;3881:12; 3915:19;3916:24 <b>precision (1)</b> 3890:12 <b>precluded (1)</b> 3745:18 <b>predecessor (1)</b> 3814:5 <b>prefer (3)</b> 3849:13,24;3865:8 <b>preference (1)</b> 3848:20 <b>preferred (1)</b> 3865:7 <b>premature (1)</b> 3772:16 <b>prematurely (1)</b> 3772:17 <b>preparation (6)</b> 3768:24;3806:22; 3813:2;3873:23; 3907:15;3924:23 <b>prepare (6)</b> 3735:15;3768:21; 3769:5,7,11;3872:6 <b>prepared (7)</b> 3731:13;3769:4; 3780:3,6;3790:21; 3796:7;3832:4 <b>preparing (5)</b> 3742:23;3768:22,25; 3805:9;3817:20 <b>prescribed (1)</b> 3893:10 <b>presence (1)</b> 3913:10 <b>present (11)</b> 3750:10,14;3765:4, 10;3814:7;3835:1; 3847:17;3897:2; 3916:1;3935:15,21 <b>presentation (5)</b> 3817:9;3830:6; 3831:20;3849:18; 3874:11 <b>presentations (2)</b> 3830:7;3948:7 <b>presented (5)</b> 3749:6;3818:14; 3824:1;3834:9,10 <b>preservation (4)</b> 3854:2,8,22,25	<b>presidency (3)</b> 3905:25;3909:13; 3915:1 <b>president (42)</b> 3887:9,9,13;3899:5, 8,10,12;3900:3; 3901:1;3905:22,24; 3906:3,4,5,6,10,11; 3907:5,9,10,14,22,25; 3908:2,16,17,21; 3909:5,9,10,17,21,24; 3910:21;3912:9,16; 3914:18,20;3915:12; 3927:9,13,19 <b>presidents (2)</b> 3887:10;3910:17 <b>pressing (1)</b> 3844:10 <b>pressure (1)</b> 3881:3 <b>presumptively (1)</b> 3844:23 <b>pretense (1)</b> 3731:4 <b>pretrial (2)</b> 3808:2,4 <b>pretty (10)</b> 3847:15;3851:18; 3873:25;3879:12; 3880:14;3885:13; 3907:21;3909:12; 3911:13;3947:21 <b>prevent (4)</b> 3749:11;3770:5,9; 3771:8 <b>prevented (4)</b> 3861:13;3869:3,4; 3905:13 <b>preventing (2)</b> 3868:25;3917:19 <b>previous (1)</b> 3845:24 <b>previously (4)</b> 3822:18;3824:24; 3825:2;3852:23 <b>price (2)</b> 3840:6;3841:19 <b>Pricewaterhouse (5)</b> 3740:2;3790:22; 3791:4,15,18 <b>primarily (1)</b> 3844:8 <b>primary (2)</b> 3841:8;3852:17 <b>principle (2)</b> 3750:2;3946:7 <b>principles (9)</b> 3749:7;3751:11; 3756:7,9,17;3777:7,8; 3780:4;3798:6 <b>printed (1)</b> 3828:25 <b>prior (17)</b>	3743:1;3795:4; 3806:13;3814:10,14; 3815:2;3816:3; 3825:13;3828:24; 3841:21;3842:6,12,15; 3845:16;3866:24; 3868:20;3873:17 <b>privilege (1)</b> 3894:15 <b>probably (16)</b> 3775:6,10;3783:18; 3804:22;3845:13; 3846:4,14;3855:8; 3861:24;3866:20; 3891:15;3915:14,17; 3917:5;3918:14; 3923:10 <b>problem (6)</b> 3737:18;3745:17; 3850:3;3874:25; 3875:2;3922:10 <b>problems (1)</b> 3816:12 <b>Procedurally (1)</b> 3884:14 <b>procedures (34)</b> 3730:20;3731:25; 3732:21;3744:21; 3746:5;3747:13; 3756:2,12,14;3767:6,8; 3772:9,20,23;3773:5,5, 8,9,17;3774:12; 3775:5;3781:14; 3799:14,19;3803:3; 3804:17;3810:10; 3821:7,9;3830:20,22; 3895:19;3917:17,22 <b>proceed (4)</b> 3812:10;3853:10; 3862:21;3926:20 <b>process (45)</b> 3735:22;3740:17,24; 3741:6;3746:19; 3751:15,16,19,20; 3752:15;3758:12; 3759:10,12;3768:24, 25;3769:10;3796:11; 3829:17;3830:12; 3831:19,22,23;3832:3; 3834:4;3838:1;3841:2, 12;3860:23;3861:3,4, 15;3862:6,16;3866:15; 3892:23;3893:2,4,6,8, 11,13;3895:7;3896:21; 3899:10;3908:12 <b>processes (6)</b> 3760:6;3769:2; 3874:8,9;3917:22; 3923:9 <b>procurement (1)</b> 3821:14 <b>produced (3)</b> 3747:11;3794:23;	3930:21 <b>professional (10)</b> 3731:20;3733:20; 3740:22;3741:3; 3754:22;3755:10; 3790:11;3915:20; 3921:4;3926:2 <b>professionalism (1)</b> 3759:16 <b>professionally (2)</b> 3747:24;3804:18 <b>professionals (3)</b> 3779:23;3796:2; 3797:17 <b>professor (1)</b> 3880:18 <b>profit (2)</b> 3835:23;3882:23 <b>program (12)</b> 3753:5;3782:13,17; 3835:12;3836:6,7,9,10, 19;3855:7;3884:22,23 <b>programs (11)</b> 3835:10,15;3837:7; 3891:1,22;3894:3; 3898:21;3901:10; 3908:25;3941:10,11 <b>progress (1)</b> 3880:1 <b>prohibited (2)</b> 3745:10,22 <b>projects (2)</b> 3740:12;3832:24 <b>prominent (1)</b> 3910:1 <b>promotion (3)</b> 3873:11,16,17 <b>prompt (1)</b> 3770:15 <b>promulgated (1)</b> 3756:16 <b>promulgates (3)</b> 3756:9,10,12 <b>proper (2)</b> 3822:4;3865:15 <b>properly (3)</b> 3746:9;3783:1; 3894:19 <b>property (2)</b> 3819:6;3882:15 <b>proposal (1)</b> 3802:20 <b>proposed (3)</b> 3900:20,25;3901:16 <b>protect (2)</b> 3919:7;3921:1 <b>protections (2)</b> 3761:18;3765:6 <b>protocol (2)</b> 3752:12;3753:16 <b>protocols (1)</b> 3782:9 <b>provide (26)</b>	3735:13,15,24; 3744:13,22;3754:14; 3759:3;3778:19; 3790:8;3791:10,14; 3792:6;3794:19; 3802:3,4,20;3827:23; 3837:9,9;3839:17,18, 21;3894:3;3905:15; 3930:13;3938:19 <b>provided (23)</b> 3768:7;3769:12,13; 3778:17;3785:4,4,5; 3790:24;3791:6; 3794:23;3795:5; 3796:14;3808:22; 3817:24,24,25;3818:1; 3841:9;3937:17; 3938:24;3939:7; 3942:16;3943:24 <b>provides (3)</b> 3769:18;3850:15; 3931:13 <b>providing (7)</b> 3765:24;3769:23; 3809:22,23,24; 3828:14;3883:25 <b>Public (19)</b> 3739:10;3740:16; 3742:1;3756:10; 3780:3;3792:7; 3804:10,10;3828:5; 3836:10;3844:24; 3893:22,25;3894:1; 3895:1;3910:1,5,12; 3929:20 <b>publically (2)</b> 3914:22;3915:2 <b>publications (1)</b> 3828:8 <b>publicly (1)</b> 3932:22 <b>published (1)</b> 3911:10 <b>pull (2)</b> 3784:20;3808:1 <b>pulling (1)</b> 3837:4 <b>pulls (1)</b> 3748:24 <b>purchase (1)</b> 3822:10 <b>purchases (2)</b> 3822:12;3830:16 <b>purchasing (6)</b> 3817:6;3821:10; 3829:20;3830:14,22; 3917:17 <b>purport (1)</b> 3904:2 <b>purpose (7)</b> 3743:21;3763:17; 3791:23;3793:7; 3873:5;3886:1;
---	---	--	--	--

NYAG v  
NRA

February 8, 2024

<p>3890:25 <b>purposes (9)</b> 3748:14,20,21; 3814:15;3837:1; 3860:14;3883:2,4; 3892:19 <b>pursuant (1)</b> 3860:14 <b>push (1)</b> 3789:1 <b>pushed (2)</b> 3861:13;3910:10 <b>put (29)</b> 3757:11;3775:6,14, 21;3779:4,23;3810:19; 3816:2,5;3819:10; 3825:8;3828:6,10; 3829:2;3836:8; 3839:22,23;3844:15; 3852:17;3863:2; 3867:19;3873:8; 3884:9;3885:9;3901:9; 3905:19;3914:8; 3917:22;3937:1 <b>puts (1)</b> 3848:6 <b>putting (5)</b> 3737:18;3798:7; 3872:24;3873:1; 3915:23 <b>puzzle (7)</b> 3816:2,5;3872:24, 25,25;3873:2,8 <b>PX (9)</b> 3818:5;3830:25; 3858:21;3930:12; 3931:3,6;3932:17; 3933:10,13</p>	<p><b>quickens (1)</b> 3848:9 <b>quicker (1)</b> 3848:12 <b>quickly (6)</b> 3799:12;3827:8,17; 3854:11;3896:11; 3910:22 <b>Quite (1)</b> 3887:24</p>	<p><b>reaction (3)</b> 3803:24;3824:9; 3920:7 <b>reactions (1)</b> 3842:11 <b>read (11)</b> 3730:2;3736:19; 3737:1;3766:13,21; 3795:3;3805:4,9; 3902:20;3922:20; 3937:4 <b>reader (1)</b> 3757:13 <b>reading (2)</b> 3738:2;3820:13 <b>ready (6)</b> 3789:7;3811:23; 3844:4,5;3918:23; 3947:22 <b>real (4)</b> 3762:18;3800:23; 3802:17;3879:14 <b>reality (1)</b> 3745:17 <b>realizations (1)</b> 3816:8 <b>realize (1)</b> 3848:21 <b>realized (3)</b> 3881:20;3909:12; 3910:4 <b>really (15)</b> 3730:3;3745:18; 3755:20;3766:10; 3773:8;3838:20; 3844:7;3848:18; 3850:24;3877:22; 3879:17;3891:22; 3904:3;3910:6; 3939:24 <b>reason (2)</b> 3731:12;3933:2 <b>reasonable (2)</b> 3801:17;3848:24 <b>reasonably (1)</b> 3852:13 <b>reasons (1)</b> 3920:24 <b>recall (25)</b> 3745:3;3748:6; 3753:13;3754:24; 3761:12;3773:19; 3780:7;3783:16; 3784:16;3802:11; 3821:20;3837:24; 3853:24,25;3854:5; 3863:4;3866:2;3870:3; 3874:5,12;3907:16; 3933:23,24;3938:9; 3940:8 <b>recap (1)</b> 3777:9 <b>receivable (1)</b></p>	<p>3873:20 <b>receive (5)</b> 3801:17;3834:25; 3854:2;3912:12; 3916:12 <b>received (23)</b> 3730:4;3790:16; 3835:5;3840:4; 3841:15,19;3857:3; 3882:7;3888:25; 3889:9,15;3902:3; 3918:3;3927:22; 3928:11;3929:11; 3931:7;3932:7; 3933:14;3935:8; 3936:8,17;3945:3 <b>receives (2)</b> 3893:9;3927:15 <b>receiving (3)</b> 3732:15;3835:5; 3929:19 <b>recently (1)</b> 3893:24 <b>receptive (1)</b> 3824:12 <b>recess (3)</b> 3789:5;3843:5; 3904:20 <b>recognize (2)</b> 3889:16,21 <b>recollection (4)</b> 3854:10,18,21,24 3778:19;3885:8,17 <b>recommendations (4)</b> 3778:14,21;3779:1; 3903:7 <b>reconvene (1)</b> 3842:20 <b>record (2)</b> 3829:18;3936:21 <b>recorder (1)</b> 3877:6 <b>records (5)</b> 3844:24;3845:1; 3938:19,21,23 <b>RECROSS-EXAMINATION (1)</b> 3788:5 <b>recuse (1)</b> 3920:23 <b>red (4)</b> 3768:15;3801:16; 3802:5;3810:2 <b>redacted (2)</b> 3932:21;3933:15 <b>redacting (1)</b> 3930:22 <b>REDIRECT (4)</b> 3786:5;3872:3,4; 3947:6 <b>REDIRECT-EXAMINATION (1)</b> 3810:16 <b>reelected (3)</b></p>	<p>3909:8,15,22 <b>refer (2)</b> 3731:4;3821:11 <b>reference (1)</b> 3757:5 <b>referenced (2)</b> 3731:16;3835:19 <b>references (1)</b> 3730:10 <b>referred (1)</b> 3784:14 <b>referring (5)</b> 3785:3;3831:9,17; 3873:24;3882:8 <b>refers (7)</b> 3773:8;3821:2; 3822:11;3823:7,13; 3831:2,13 <b>reforms (2)</b> 3863:1,7 <b>refresh (3)</b> 3854:10,21,24 <b>refresher (5)</b> 3747:21;3761:1; 3765:9;3842:5,11 <b>refreshing (1)</b> 3854:18 <b>Refuse (1)</b> 3837:1 <b>refused (1)</b> 3867:5 <b>refuting (1)</b> 3782:1 <b>regard (2)</b> 3792:25;3822:16 <b>regarding (5)</b> 3809:25;3820:4; 3938:7;3939:1; 3940:12 <b>regular (3)</b> 3743:16;3814:18; 3933:4 <b>regularly (5)</b> 3814:17;3815:3,5, 12;3868:19 <b>regulations (3)</b> 3772:5;3792:21; 3827:5 <b>regulator (1)</b> 3805:16 <b>regulatory (2)</b> 3746:8;3782:20 <b>rehash (1)</b> 3730:23 <b>reimburse (1)</b> 3944:8 <b>reimbursement (7)</b> 3828:19,20;3830:20, 21;3874:20;3918:6; 3928:19 <b>reimbursements (1)</b> 3929:5 <b>reinforce (2)</b></p>
<p><b>Q</b>  <b>qualifications (1)</b> 3808:10 <b>qualified (1)</b> 3808:11 <b>qualitative (3)</b> 3750:16,19,21 <b>quality (4)</b> 3773:12,14;3849:17, 18 <b>quantitative (1)</b> 3750:20 <b>questionnaire (5)</b> 3754:24;3758:25; 3759:5;3911:16; 3925:20 <b>questionnaires (8)</b> 3746:20,21;3751:17; 3753:10;3756:3,3; 3759:14;3918:4 <b>quick (4)</b> 3795:17;3844:6; 3846:7;3924:10</p>	<p><b>R</b>  <b>radio (2)</b> 3877:3,9 <b>raise (4)</b> 3844:10;3901:14; 3902:7;3939:2 <b>raised (8)</b> 3768:15;3778:13; 3809:8;3875:24; 3876:4;3921:8;3938:8, 11 <b>rally (1)</b> 3910:25 <b>ramping (1)</b> 3815:19 <b>ran (3)</b> 3897:8;3911:21; 3922:24 <b>random (1)</b> 3868:22 <b>randomly (1)</b> 3815:4 <b>range (1)</b> 3864:16 <b>ranging (1)</b> 3749:10 <b>rank (3)</b> 3777:15;3778:10,12 <b>ranking (2)</b> 3774:25;3775:12 <b>ranks (1)</b> 3774:23 <b>rare (1)</b> 3826:25 <b>rate (5)</b> 3743:15;3781:6; 3806:8,11;3916:20 <b>rather (2)</b> 3844:13;3948:12 <b>ratified (2)</b> 3801:14;3920:23 <b>ratify (3)</b> 3920:4,16;3921:2 <b>reach (2)</b> 3733:6;3904:9 <b>reached (6)</b> 3732:18;3746:1; 3750:23,25;3883:18; 3893:21 <b>reaching (1)</b> 3755:23</p>	<p><b>reaction (3)</b> 3803:24;3824:9; 3920:7 <b>reactions (1)</b> 3842:11 <b>read (11)</b> 3730:2;3736:19; 3737:1;3766:13,21; 3795:3;3805:4,9; 3902:20;3922:20; 3937:4 <b>reader (1)</b> 3757:13 <b>reading (2)</b> 3738:2;3820:13 <b>ready (6)</b> 3789:7;3811:23; 3844:4,5;3918:23; 3947:22 <b>real (4)</b> 3762:18;3800:23; 3802:17;3879:14 <b>reality (1)</b> 3745:17 <b>realizations (1)</b> 3816:8 <b>realize (1)</b> 3848:21 <b>realized (3)</b> 3881:20;3909:12; 3910:4 <b>really (15)</b> 3730:3;3745:18; 3755:20;3766:10; 3773:8;3838:20; 3844:7;3848:18; 3850:24;3877:22; 3879:17;3891:22; 3904:3;3910:6; 3939:24 <b>reason (2)</b> 3731:12;3933:2 <b>reasonable (2)</b> 3801:17;3848:24 <b>reasonably (1)</b> 3852:13 <b>reasons (1)</b> 3920:24 <b>recall (25)</b> 3745:3;3748:6; 3753:13;3754:24; 3761:12;3773:19; 3780:7;3783:16; 3784:16;3802:11; 3821:20;3837:24; 3853:24,25;3854:5; 3863:4;3866:2;3870:3; 3874:5,12;3907:16; 3933:23,24;3938:9; 3940:8 <b>recap (1)</b> 3777:9 <b>receivable (1)</b></p>	<p><b>receives (2)</b> 3893:9;3927:15 <b>receiving (3)</b> 3732:15;3835:5; 3929:19 <b>recently (1)</b> 3893:24 <b>receptive (1)</b> 3824:12 <b>recess (3)</b> 3789:5;3843:5; 3904:20 <b>recognize (2)</b> 3889:16,21 <b>recollection (4)</b> 3854:10,18,21,24 3778:19;3885:8,17 <b>recommendations (4)</b> 3778:14,21;3779:1; 3903:7 <b>reconvene (1)</b> 3842:20 <b>record (2)</b> 3829:18;3936:21 <b>recorder (1)</b> 3877:6 <b>records (5)</b> 3844:24;3845:1; 3938:19,21,23 <b>RECROSS-EXAMINATION (1)</b> 3788:5 <b>recuse (1)</b> 3920:23 <b>red (4)</b> 3768:15;3801:16; 3802:5;3810:2 <b>redacted (2)</b> 3932:21;3933:15 <b>redacting (1)</b> 3930:22 <b>REDIRECT (4)</b> 3786:5;3872:3,4; 3947:6 <b>REDIRECT-EXAMINATION (1)</b> 3810:16 <b>reelected (3)</b></p>	<p><b>refer (2)</b> 3731:4;3821:11 <b>reference (1)</b> 3757:5 <b>referenced (2)</b> 3731:16;3835:19 <b>references (1)</b> 3730:10 <b>referred (1)</b> 3784:14 <b>referring (5)</b> 3785:3;3831:9,17; 3873:24;3882:8 <b>refers (7)</b> 3773:8;3821:2; 3822:11;3823:7,13; 3831:2,13 <b>reforms (2)</b> 3863:1,7 <b>refresh (3)</b> 3854:10,21,24 <b>refresher (5)</b> 3747:21;3761:1; 3765:9;3842:5,11 <b>refreshing (1)</b> 3854:18 <b>Refuse (1)</b> 3837:1 <b>refused (1)</b> 3867:5 <b>refuting (1)</b> 3782:1 <b>regard (2)</b> 3792:25;3822:16 <b>regarding (5)</b> 3809:25;3820:4; 3938:7;3939:1; 3940:12 <b>regular (3)</b> 3743:16;3814:18; 3933:4 <b>regularly (5)</b> 3814:17;3815:3,5, 12;3868:19 <b>regulations (3)</b> 3772:5;3792:21; 3827:5 <b>regulator (1)</b> 3805:16 <b>regulatory (2)</b> 3746:8;3782:20 <b>rehash (1)</b> 3730:23 <b>reimburse (1)</b> 3944:8 <b>reimbursement (7)</b> 3828:19,20;3830:20, 21;3874:20;3918:6; 3928:19 <b>reimbursements (1)</b> 3929:5 <b>reinforce (2)</b></p>

NYAG v  
NRA

February 8, 2024

<p>3753:15;3761:3 <b>related (8)</b> 3746:10;3753:25; 3755:4;3758:13,20; 3830:14,14;3838:24 <b>related-parties (1)</b> 3757:10 <b>Related-party (34)</b> 3732:17;3746:6,13, 15,20;3750:24;3751:1, 4;3754:9,12,14,15,24, 25;3755:1,7,24;3757:1, 2,4,6,14,15,17,19,21; 3758:12,24;3759:11, 24;3760:2;3781:15,25; 3925:12 <b>relates (3)</b> 3747:18;3761:8; 3868:24 <b>relating (1)</b> 3771:12 <b>relations (1)</b> 3828:6 <b>relationship (3)</b> 3771:18;3828:1; 3834:6 <b>relationships (4)</b> 3742:18;3745:11,13; 3810:9 <b>relative (3)</b> 3777:16;3778:11; 3831:22 <b>relatively (4)</b> 3736:12;3891:19; 3898:5;3901:7 <b>release (1)</b> 3947:4 <b>Relevance (4)</b> 3835:2;3845:5,6,13 <b>relevant (3)</b> 3844:19;3845:15,17 <b>reliance (1)</b> 3731:3 <b>relied (1)</b> 3784:9 <b>relies (1)</b> 3770:11 <b>rely (4)</b> 3733:8;3795:25; 3796:1;3888:14 <b>remained (3)</b> 3818:19,21;3824:11 <b>remember (21)</b> 3783:13;3789:10; 3811:1;3842:7;3854:1; 3855:12,20;3860:17, 21;3874:20;3876:7; 3889:3;3893:15,16; 3895:12;3896:10; 3897:25;3906:5,9; 3918:16;3923:17; 3925:16;3929:14; 3935:17;3937:10;</p>	<p>3946:23;3947:12 <b>remind (2)</b> 3812:17;3946:17 <b>removed (2)</b> 3734:22;3828:2 <b>render (2)</b> 3749:4;3804:19 <b>rendered (1)</b> 3733:13 <b>rendering (3)</b> 3733:16;3740:22; 3749:12 <b>renegotiated (1)</b> 3855:17 <b>rental (4)</b> 3819:3,8,9;3820:2 <b>repaid (1)</b> 3945:6 <b>repeat (6)</b> 3770:25;3785:20; 3787:6,25;3804:21; 3807:21 <b>repeating (3)</b> 3805:5;3922:4,6 <b>rephrase (2)</b> 3786:20;3920:9 <b>replied (1)</b> 3931:8 <b>report (30)</b> 3731:13,16;3732:10, 12;3733:19;3735:4; 3753:18;3755:14,17; 3756:22;3776:13,18, 20;3777:20;3796:7,13; 3808:11;3812:23; 3813:11,17;3863:20; 3864:7,12;3885:6; 3888:23;3918:3; 3936:13,14;3943:5; 3948:13 <b>reported (10)</b> 3751:24;3759:17; 3782:22;3813:18; 3822:22;3828:23; 3863:18,23;3864:7; 3918:6 <b>reporter (3)</b> 3739:21;3878:4; 3890:5 <b>reporting (21)</b> 3744:23;3748:21; 3752:11;3764:7,12,13; 3768:6,9;3771:9,15; 3821:14;3824:21,22; 3869:7;3918:10; 3925:14,14,17,17; 3940:12,14 <b>reportings (1)</b> 3771:25 <b>reports (14)</b> 3742:8;3756:1; 3777:19;3795:1,13; 3796:9;3828:18;</p>	<p>3844:9,23;3845:1; 3894:13,14;3907:15; 3925:4 <b>represent (7)</b> 3858:6;3862:23; 3894:2;3924:9; 3930:20;3938:4; 3942:5 <b>represented (1)</b> 3869:23 <b>representing (2)</b> 3880:24;3910:8 <b>represents (1)</b> 3869:18 <b>request (9)</b> 3802:20;3836:15,15, 16,19,21;3837:8,11; 3838:3 <b>requested (2)</b> 3742:21;3744:7 <b>require (4)</b> 3733:20;3810:3; 3847:2;3848:22 <b>required (8)</b> 3754:8,9,11;3771:7; 3774:1,2;3776:24; 3911:16 <b>requirement (3)</b> 3774:5,10;3917:14 <b>requirements (4)</b> 3757:2;3905:18; 3915:20,21 <b>resignation (1)</b> 3922:24 <b>resigned (1)</b> 3923:22 <b>resolution (1)</b> 3790:23 <b>resolutions (1)</b> 3887:22 <b>resolving (1)</b> 3847:13 <b>respect (7)</b> 3735:8;3746:12; 3747:9;3783:1; 3824:20;3937:9; 3941:6 <b>respectful (1)</b> 3886:7 <b>respectfully (1)</b> 3851:22 <b>respond (3)</b> 3778:6,20;3845:7 <b>responded (2)</b> 3778:10;3909:25 <b>responding (1)</b> 3776:14 <b>responds (1)</b> 3933:25 <b>response (4)</b> 3764:21;3777:15; 3796:20;3913:1 <b>responsibilities (15)</b></p>	<p>3746:9;3761:7; 3771:23,24;3777:2; 3783:1;3812:24; 3817:2;3864:14; 3873:15;3883:23; 3884:2,13;3887:7; 3899:20 <b>responsibility (15)</b> 3742:19,25;3744:6; 3763:15;3772:1,2,7; 3828:10;3868:4; 3881:21;3883:24; 3884:25;3887:12; 3894:9;3925:3 <b>responsible (14)</b> 3742:23;3756:17,18; 3772:4;3813:1,2,2; 3835:16;3873:17,19, 21;3894:11;3924:23; 3941:8 <b>responsive (1)</b> 3778:14 <b>responsiveness (3)</b> 3777:16;3778:11,13 <b>rest (1)</b> 3851:8 <b>restaurant (1)</b> 3886:22 <b>restrict (1)</b> 3891:6 <b>restricted (8)</b> 3835:11,11,12,14,15; 3836:6,7;3860:19 <b>restricting (1)</b> 3835:10 <b>restriction (1)</b> 3835:8 <b>restroom (1)</b> 3878:9 <b>result (1)</b> 3940:16 <b>results (12)</b> 3751:16,22;3753:11; 3759:14;3777:2,10; 3814:23;3833:1; 3896:6,12,14,15 <b>resume (1)</b> 3805:12 <b>resumed (2)</b> 3852:24;3904:21 <b>retain (1)</b> 3943:24 <b>retained (2)</b> 3781:3;3796:8 <b>retains (1)</b> 3892:25 <b>retaking (1)</b> 3804:9 <b>retaliated (1)</b> 3764:10 <b>retire (2)</b> 3918:23,24 <b>retired (2)</b></p>	<p>3923:22;3939:19 <b>return (1)</b> 3770:6 <b>returning (2)</b> 3936:12,14 <b>returns (3)</b> 3770:18;3790:21; 3840:13 <b>revealing (1)</b> 3774:22 <b>revenues (2)</b> 3750:12,12 <b>review (21)</b> 3740:16;3741:10,14; 3743:1;3744:18,19,20; 3760:5;3766:3;3769:3, 16;3776:2,21;3785:4; 3795:3;3808:9; 3826:20;3832:8; 3906:9;3922:11; 3938:21 <b>reviewed (20)</b> 3742:8;3747:12; 3754:17;3757:4; 3762:21;3767:19; 3768:9,11,12;3776:24; 3794:25;3796:9,17; 3805:12;3811:8; 3922:14,16;3929:18; 3939:6;3940:23 <b>reviewing (7)</b> 3773:3;3777:14; 3796:16;3906:8; 3922:7,8,13 <b>reviews (2)</b> 3740:25;3741:13 <b>revised (2)</b> 3762:23;3830:19 <b>revisions (1)</b> 3761:10 <b>Rick (4)</b> 3813:18;3814:20; 3826:24;3866:7 <b>rid (1)</b> 3912:16 <b>Rifle (4)</b> 3818:18;3890:11; 3919:4;3935:14 <b>rigging (1)</b> 3895:17 <b>right (156)</b> 3734:13;3738:5,5; 3741:22;3742:6,9,13; 3743:7;3747:25; 3748:2,13;3755:18; 3759:6;3760:10; 3761:23,25;3763:1; 3764:3;3767:15; 3768:19;3770:6,10; 3772:20,24;3775:17; 3776:1,19;3777:12; 3778:4,7,8;3779:14,16; 3780:14;3783:10;</p>
---	---	---	--	---

NYAG v  
NRA

February 8, 2024

3784:4;3786:9; 3788:20;3792:17,19; 3793:12,25;3794:7,12, 16;3796:7,18;3798:1; 3799:21,24;3800:13, 23;3806:25;3809:2,5,9, 12;3811:9;3812:23; 3820:23;3823:12; 3825:9,11;3828:12; 3830:8;3836:1;3837:5, 21;3838:21;3840:10; 3841:12,25;3842:3,13, 16,19;3844:18,24; 3846:1,2,3;3848:2,10; 3849:20;3853:6,7; 3857:2,3;3865:7,17; 3866:17;3867:10,13; 3868:23;3869:8,15,18, 24;3870:23;3872:10, 14;3877:11;3878:24; 3879:4;3881:4; 3882:12;3883:11,11, 12;3886:15;3889:13; 3894:5;3895:20,22; 3896:19;3899:8,19; 3900:6;3905:4; 3907:23;3911:25; 3913:20;3914:23; 3915:2;3916:12; 3917:5;3918:19; 3920:1,11,17,20; 3921:3;3922:17,21,24; 3923:13;3927:11; 3930:4;3931:15; 3934:13;3935:11; 3937:14;3938:14; 3939:8,14,17,21,22,25; 3940:3,13,17;3946:9, 25;3947:9,17	3936:21,25;3937:8 <b>robustly (1)</b> 3755:23 <b>robustness (2)</b> 3765:1;3885:11 <b>rock (1)</b> 3946:7 <b>ROGERS (65)</b> 3730:22;3731:25; 3732:6,11;3733:15; 3734:1;3735:7; 3737:18;3738:18; 3739:3,19;3743:18; 3749:24;3755:16; 3758:2;3761:21,25; 3762:15;3765:24; 3769:22;3772:13,17; 3775:21;3776:14; 3777:20;3779:5; 3784:20;3786:4,6; 3788:1,19,24;3789:8, 17;3790:1;3793:4; 3799:8;3805:24; 3807:15;3808:19; 3810:15,17,18;3811:9, 19;3847:5,12;3875:12, 20;3881:25;3889:8,12; 3904:11;3905:1,4,5; 3920:9;3923:25; 3927:24;3931:4; 3933:11;3934:25; 3937:1;3938:6;3947:6 <b>role (13)</b> 3739:12;3740:8; 3761:7;3817:14; 3871:10,12;3882:19; 3889:24;3908:7; 3910:12;3914:21; 3915:13;3925:24 <b>room (5)</b> 3834:7;3871:22; 3897:16;3920:22; 3948:17 <b>rooms (4)</b> 3878:6,7;3880:6,7 <b>Rotary (1)</b> 3915:18 <b>rough (2)</b> 3923:23;3947:22 <b>roughly (2)</b> 3864:12;3931:2 <b>round (2)</b> 3736:11;3816:4 <b>route (3)</b> 3838:23;3839:7; 3873:5 <b>routed (1)</b> 3839:4 <b>routes (1)</b> 3829:15 <b>routing (1)</b> 3839:6 <b>Rowling (7)</b>	3748:6;3769:13; 3812:23;3814:19; 3817:4;3825:1; 3864:11 <b>Rowling's (2)</b> 3868:12,14 <b>royalties (1)</b> 3793:1 <b>rule (9)</b> 3884:21;3885:14; 3943:6,10,11,16,23; 3944:2,7 <b>rules (15)</b> 3758:4;3792:21; 3830:9,23;3852:10; 3885:14,14;3887:3; 3888:5,8;3900:16; 3917:24,25;3943:9,20 <b>ruling (2)</b> 3807:15;3810:20 <b>rulings (1)</b> 3881:4 <b>run (13)</b> 3748:11;3878:7; 3897:8,12;3898:3; 3902:15;3905:10,15; 3906:22;3909:23; 3911:11,14,20 <b>running (2)</b> 3902:22;3911:6 <b>runs (1)</b> 3903:3 <b>Russia (1)</b> 3876:6 <b>Ryan (2)</b> 3793:9;3808:9	3882:25;3886:7; 3893:4,6;3908:6,15; 3913:4;3914:14; 3922:4;3928:22; 3931:17;3936:8,18; 3944:12 <b>sample (2)</b> 3740:19;3760:3 <b>San (2)</b> 3875:25;3876:2 <b>Sandra (2)</b> 3875:12,17 <b>Sandy (2)</b> 3875:24;3930:20 <b>Santa (2)</b> 3880:15,19 <b>sat (1)</b> 3917:1 <b>satisfaction (1)</b> 3861:20 <b>satisfied (1)</b> 3901:18 <b>save (1)</b> 3923:19 <b>saw (13)</b> 3731:19,19;3732:22; 3762:2;3763:6; 3768:17;3775:19; 3799:1;3819:4; 3845:13;3866:13,14; 3908:9 <b>saying (22)</b> 3733:4,13,15,19; 3734:17;3735:23; 3737:2;3749:4,6; 3781:20;3783:23; 3805:8;3840:3,6; 3893:17;3912:24; 3913:5;3918:15,16; 3922:12;3923:17; 3946:23 <b>schedule (5)</b> 3770:16,17;3829:23, 24;3849:7 <b>scheduled (6)</b> 3814:17;3815:3,4,5, 12;3868:19 <b>schedules (2)</b> 3771:8;3830:1 <b>school (18)</b> 3876:8,8,9;3877:11, 16,19,20;3878:2,6,10, 12,16,19;3879:1,3,9; 3880:15;3924:18 <b>schools (2)</b> 3877:15;3915:15 <b>Science (1)</b> 3739:10 <b>scope (13)</b> 3734:11;3755:14; 3770:1,1;3776:13,20; 3777:18;3816:10; 3855:19;3864:14;	3897:19;3927:24; 3928:9 <b>screen (7)</b> 3793:8;3810:20,21; 3839:19;3858:12; 3908:21;3933:15 <b>screens (1)</b> 3768:19 <b>script (2)</b> 3872:10;3922:6 <b>scroll (1)</b> 3810:20 <b>scrub (1)</b> 3730:10 <b>scrutinize (1)</b> 3805:20 <b>search (1)</b> 3819:5 <b>seat (6)</b> 3738:16;3789:6,15; 3853:5;3902:16; 3905:2 <b>seated (4)</b> 3739:2;3789:24; 3812:9;3875:18 <b>second (18)</b> 3731:16;3732:16; 3744:20;3747:10; 3768:15;3780:13; 3818:6;3831:1,2; 3905:23;3906:13; 3907:6,22;3908:1; 3909:6,10;3916:17,17 <b>secret (3)</b> 3803:23;3902:7,8 <b>Secretariat (5)</b> 3793:8;3794:4; 3806:9,14,16 <b>secretary (8)</b> 3887:23;3896:15; 3905:18;3907:8; 3911:17;3922:9; 3924:21,22 <b>secretary's (5)</b> 3844:9,22;3845:1; 3887:25;3888:1 <b>section (1)</b> 3755:16 <b>securities (1)</b> 3879:13 <b>security (2)</b> 3895:7,19 <b>seeing (5)</b> 3754:24;3761:12; 3865:10;3876:6; 3921:18 <b>seeking (1)</b> 3935:2 <b>seem (2)</b> 3824:20;3837:21 <b>seeded (1)</b> 3824:17,19 <b>seems (2)</b>
		<b>S</b>		
<b>rights (2)</b> 3911:8;3916:5 <b>rigor (1)</b> 3890:8 <b>rigorous (1)</b> 3803:19 <b>riots (1)</b> 3877:5 <b>rise (9)</b> 3738:12;3789:2,12; 3842:21;3853:2; 3880:7;3886:15; 3904:22;3947:14 <b>risk (7)</b> 3764:1,2,4;3796:25; 3814:24;3817:5; 3864:17 <b>robust (18)</b> 3732:5;3751:10; 3752:15;3753:6,19; 3758:11;3759:1; 3762:6;3768:22; 3769:2;3774:11,16; 3781:13,21;3782:1;		<b>safe (6)</b> 3806:21;3835:12; 3836:19;3884:24; 3895:5;3941:8 <b>safely (1)</b> 3896:9 <b>safety (3)</b> 3881:21;3891:7,7 <b>salaries (1)</b> 3836:3 <b>salary (6)</b> 3867:24;3868:1,11, 15;3869:12;3912:12 <b>sales (1)</b> 3873:22 <b>salt (1)</b> 3904:5 <b>same (27)</b> 3730:19;3731:6; 3737:16;3743:15; 3755:4;3766:6; 3794:10;3805:5,5; 3823:18;3832:20; 3833:4;3850:11;		

NYAG v  
NRA

February 8, 2024

3734:14;3870:2 <b>selection (1)</b> 3850:9 <b>self-dealing (1)</b> 3802:2 <b>self-dealt (1)</b> 3800:19 <b>seminar (4)</b> 3753:4;3761:3; 3830:14;3842:6 <b>seminars (12)</b> 3747:21;3752:6,7; 3753:2,14;3761:1,5; 3765:9;3830:13; 3874:15,16;3898:15 <b>send (10)</b> 3730:3;3775:16; 3828:24;3832:6,10; 3836:18,20;3840:19, 25;3917:4 <b>senior (18)</b> 3746:22;3751:14; 3752:9;3753:11; 3758:21;3759:13,18; 3821:3;3822:1,15; 3823:3,3,9;3831:3,8, 10;3832:5;3839:8 <b>sense (7)</b> 3731:7;3737:9; 3748:12;3872:23; 3886:8;3888:7; 3899:11 <b>sensitive (1)</b> 3765:16 <b>sent (11)</b> 3735:9;3737:5; 3818:2;3824:13; 3827:21;3829:4; 3838:7;3867:12; 3892:10;3894:10; 3933:17 <b>sentence (1)</b> 3922:4 <b>sentences (1)</b> 3810:21 <b>separate (7)</b> 3735:11;3737:7,11; 3754:7;3774:17; 3836:22;3943:20 <b>separated (1)</b> 3836:12 <b>separately (1)</b> 3748:13 <b>separation (1)</b> 3881:13 <b>September (4)</b> 3740:6;3889:17; 3898:9,10 <b>series (1)</b> 3835:24 <b>serve (16)</b> 3873:7;3893:25; 3894:23,24;3895:11;	3897:5;3900:2,4,15; 3906:17;3909:5,7,9,11, 22;3916:3 <b>served (17)</b> 3743:22;3744:1; 3751:8;3783:17; 3882:21;3890:20,23, 24;3892:1,13;3893:14, 24;3895:9,14;3900:7; 3931:19,21 <b>service (8)</b> 3742:20;3801:20,23; 3841:9,16;3895:15; 3915:17;3933:7 <b>services (26)</b> 3742:19,20,21,25; 3754:20;3769:15; 3774:14;3781:9; 3790:8,9,24;3791:7,7, 14;3792:7;3794:19; 3801:18;3802:21; 3806:10;3821:12; 3835:19;3838:25; 3839:3;3841:18; 3864:17;3923:7 <b>session (3)</b> 3765:18;3844:2; 3894:15 <b>sessions (1)</b> 3897:23 <b>set (11)</b> 3735:10,15;3736:6; 3737:7;3835:22; 3858:18;3887:3; 3907:9,12,18;3935:5 <b>Seth (1)</b> 3862:23 <b>sets (1)</b> 3888:5 <b>several (7)</b> 3748:23;3870:2; 3884:18;3912:19; 3917:23;3925:4; 3931:21 <b>share (4)</b> 3796:21;3815:24; 3819:1;3885:25 <b>shared (2)</b> 3865:21;3866:5 <b>shareholders (1)</b> 3896:17 <b>sharing (3)</b> 3815:1;3816:4,5 <b>sheet (8)</b> 3901:19;3932:7,9; 3933:21;3934:8,13,14; 3937:16 <b>ship (1)</b> 3923:23 <b>shooter (3)</b> 3890:10,11,11 <b>shooting (4)</b> 3881:23;3890:9,11,	18 <b>short (3)</b> 3788:25;3902:19; 3904:12 <b>shorter (2)</b> 3848:22;3849:19 <b>shortest (1)</b> 3880:2 <b>shortly (1)</b> 3861:2 <b>shotgun (1)</b> 3890:10 <b>show (9)</b> 3840:17;3841:20; 3898:17;3912:24; 3913:10;3928:4; 3930:1,11;3936:25 <b>showed (1)</b> 3940:16 <b>showing (3)</b> 3800:7;3837:10; 3930:16 <b>shown (2)</b> 3810:20;3932:22 <b>sick (1)</b> 3914:22 <b>side (9)</b> 3742:12,13;3813:3; 3828:16,17,21; 3880:22;3893:13,19 <b>sides (1)</b> 3916:1 <b>Sigler (1)</b> 3901:6 <b>sign (3)</b> 3839:10;3840:22,25 <b>signature (2)</b> 3841:7,13 <b>signatures (7)</b> 3822:9;3826:18; 3830:15;3841:1,21; 3905:16,19 <b>signed (3)</b> 3820:7;3841:20; 3941:22 <b>significant (4)</b> 3767:22;3776:7; 3816:12;3945:6 <b>signs (2)</b> 3840:18,24 <b>Silicone (1)</b> 3880:16 <b>similar (11)</b> 3734:5;3739:15; 3740:18;3741:8,9; 3742:22;3743:17; 3754:18,20;3773:1; 3829:21 <b>similarly (2)</b> 3907:13,15 <b>simple (2)</b> 3768:1;3838:20 <b>simply (2)</b>	3730:23;3795:18 <b>singers (1)</b> 3898:19 <b>single (4)</b> 3735:18;3737:25; 3913:13;3939:14 <b>sister (1)</b> 3878:4 <b>sit (5)</b> 3795:4;3859:24; 3862:1;3867:18; 3944:17 <b>sitting (7)</b> 3816:4,14;3834:8; 3850:11;3866:9; 3868:15;3873:1 <b>situate (1)</b> 3753:21 <b>situated (1)</b> 3742:15 <b>six (4)</b> 3804:22;3849:4; 3900:17,20 <b>sixties (1)</b> 3877:5 <b>size (6)</b> 3740:18;3748:7,9; 3840:10,10;3897:19 <b>sized (2)</b> 3907:13,16 <b>skepticism (2)</b> 3754:22;3759:15 <b>skills (1)</b> 3784:10 <b>skipped (1)</b> 3747:4 <b>slate (2)</b> 3905:13;3931:15 <b>slide (12)</b> 3732:14;3734:7; 3747:2,4;3750:7; 3770:20;3771:1; 3790:14;3793:20; 3796:22;3798:1; 3800:7 <b>slides (13)</b> 3730:4,7,9,11,11,12, 20;3733:17,22; 3734:25;3758:17; 3799:12,12 <b>slightly (2)</b> 3758:3;3772:14 <b>slots (1)</b> 3900:25 <b>slower (2)</b> 3783:14;3890:5 <b>slowly (2)</b> 3789:11;3818:22 <b>small (5)</b> 3740:5;3840:11; 3891:19;3898:5; 3901:7 <b>smaller (1)</b>	3907:19 <b>social (6)</b> 3834:18;3886:15,17, 21,25;3887:1 <b>socioeconomic (1)</b> 3885:24 <b>software (19)</b> 3768:20;3769:7,21; 3770:4,5,11,12,17,24; 3771:3,5;3829:13,21; 3830:5;3837:5; 3839:20;3855:3,7; 3874:4 <b>sold (2)</b> 3818:19;3878:19 <b>solo (1)</b> 3916:24 <b>solve (1)</b> 3770:24 <b>somebody (3)</b> 3881:17;3915:25; 3922:5 <b>someone (13)</b> 3745:16;3748:23; 3820:1;3826:16; 3866:6;3881:14; 3888:1;3901:4,18; 3903:19,20;3917:1; 3942:11 <b>something's (1)</b> 3885:18 <b>sometime (1)</b> 3917:5 <b>Sometimes (20)</b> 3765:16;3766:17; 3792:4;3794:20; 3796:1;3804:24,25; 3845:16;3874:17; 3886:4,11,21;3889:2; 3894:12;3897:11; 3903:15,24;3905:25; 3906:8;3911:24 <b>somewhat (1)</b> 3759:7 <b>somewhere (3)</b> 3797:20,21;3877:16 <b>Sonya (11)</b> 3748:6;3769:13; 3812:23;3814:19; 3817:4,25;3818:3; 3824:25;3864:11; 3868:12,14 <b>Sonya's (1)</b> 3817:23 <b>soon (1)</b> 3814:18 <b>sophisticated (1)</b> 3920:10 <b>sorry (15)</b> 3744:17,18;3747:6; 3770:25;3785:20; 3787:6,9,25;3817:13; 3847:5;3858:10;
---	--	--	--	--

NYAG v  
NRA

February 8, 2024

3878:4;3906:20; 3907:10;3917:19 <b>sort (17)</b> 3734:8,21;3825:1,5, 9;3827:12;3829:15; 3830:7;3842:2; 3846:11;3848:14; 3849:20;3851:14; 3867:17,19;3887:21; 3918:22 <b>sought (2)</b> 3855:10;3901:17 <b>sound (3)</b> 3769:2;3787:17; 3805:2 <b>sounds (3)</b> 3734:18;3766:17; 3935:6 <b>space (1)</b> 3759:3 <b>speak (10)</b> 3864:1;3883:9; 3904:2;3910:4;3911:5; 3915:8;3916:4,8,16; 3918:10 <b>speakers (1)</b> 3898:20 <b>speaking (26)</b> 3792:4;3893:17; 3910:19,20,25; 3914:25;3915:2,9; 3917:3,10;3918:3,7,22, 25;3928:1,6;3940:7,13, 16;3941:1,4,5,12,18, 20,23 <b>special (10)</b> 3740:11;3772:9,19, 22;3773:8,16;3799:13, 18;3803:3;3804:16 <b>specializing (2)</b> 3740:3,10 <b>specific (10)</b> 3750:22;3763:11; 3794:8;3826:4,4; 3836:11,11;3926:6,6; 3945:5 <b>specifically (9)</b> 3730:12;3746:5; 3747:18;3754:10; 3795:13;3800:5; 3818:16;3822:7; 3824:14 <b>specifics (1)</b> 3765:17 <b>specified (1)</b> 3874:12 <b>speculate (1)</b> 3807:12 <b>speculating (1)</b> 3819:19 <b>speculation (1)</b> 3913:25 <b>speech (2)</b>	3883:11,13 <b>speeches (2)</b> 3916:10;3918:19 <b>Spell (1)</b> 3812:7 <b>spend (2)</b> 3739:13;3906:17 <b>spending (2)</b> 3848:19;3877:22 <b>spent (6)</b> 3739:18;3740:1; 3744:2;3806:20; 3835:18;3836:25 <b>spoke (7)</b> 3783:5;3809:18; 3855:11;3915:15,18, 18,22 <b>spoken (5)</b> 3834:13,14;3844:7; 3860:8;3930:8 <b>sponsored (1)</b> 3915:24 <b>sport (1)</b> 3890:12 <b>sports (2)</b> 3881:23;3890:9 <b>spot (1)</b> 3897:10 <b>spouse (1)</b> 3745:13 <b>Spray (10)</b> 3813:20;3815:12,24; 3817:14;3823:6; 3824:25;3861:2; 3865:21;3868:20; 3873:7 <b>Spray's (5)</b> 3815:2;3825:13; 3865:7,8;3866:6 <b>spreadsheet (2)</b> 3837:6,9 <b>spring (5)</b> 3896:7;3898:8,13; 3914:18;3920:16 <b>squarely (1)</b> 3907:21 <b>squeeze (1)</b> 3947:25 <b>squeezed (2)</b> 3851:24;3852:2 <b>staff (3)</b> 3823:7;3888:5,8 <b>staffed (1)</b> 3899:16 <b>stage (1)</b> 3910:7 <b>stand (10)</b> 3738:23;3789:21; 3812:4;3842:25; 3845:9;3852:24; 3875:15;3885:5; 3904:15,21 <b>standard (4)</b>	3745:6;3756:8; 3817:23;3845:2 <b>standards (21)</b> 3733:20;3740:22; 3741:4,23;3745:8; 3756:11,13;3758:18; 3763:9,11;3764:21,22; 3784:7,12;3785:1,6; 3798:3,4,4;3806:24; 3807:9 <b>standpoint (3)</b> 3749:14;3750:19,21 <b>Stanford (7)</b> 3876:10;3877:1,3,8, 14,16,17 <b>start (13)</b> 3736:24;3816:5; 3827:9;3828:18; 3833:2;3846:14; 3848:24;3849:9; 3852:12;3873:2; 3896:8;3929:16; 3948:6 <b>started (26)</b> 3739:16,23;3775:1; 3794:1;3812:21; 3814:17,18;3815:11; 3816:1,1,2,7;3824:24; 3827:16,17;3828:5,17; 3830:7;3866:12; 3867:17;3874:16; 3887:17;3923:4; 3925:17;3929:14,19 <b>starting (6)</b> 3801:9;3827:20; 3919:3,6;3931:12; 3948:1 <b>starts (1)</b> 3832:3 <b>state (24)</b> 3733:3;3738:24; 3767:24;3768:7; 3774:2,5;3780:22; 3789:22;3805:16; 3806:3;3812:5;3816:8; 3825:21;3873:22,24, 25;3875:16;3880:23; 3884:16;3891:3; 3901:4,7,13;3911:2 <b>stated (3)</b> 3749:8;3767:2; 3782:19 <b>statement (24)</b> 3740:20;3750:8; 3751:5;3754:5; 3756:19,21;3760:21, 24;3762:10;3763:16, 17,21;3774:2,3; 3775:3;3780:19; 3785:2;3788:12; 3792:16;3809:2; 3829:5;3859:8;3922:2; 3928:25	<b>statements (36)</b> 3744:5;3748:22; 3749:5,6,13,16;3750:7; 3751:13,22;3756:5,16, 18,23,23;3757:1,5,9, 18;3758:14;3767:20, 21;3768:3,10;3769:1; 3771:20;3779:13,17; 3780:3,11;3792:9; 3794:25;3803:8; 3805:1;3808:23; 3828:25;3829:8 <b>States (7)</b> 3798:3;3823:14; 3831:14;3873:25; 3874:1,1;3941:5 <b>station (2)</b> 3877:4;3878:15 <b>statuses (1)</b> 3885:24 <b>stay (2)</b> 3910:14;3932:3 <b>steer (1)</b> 3923:23 <b>stellar (1)</b> 3793:13 <b>step (10)</b> 3767:24;3788:20; 3797:11,13;3811:12; 3838:10,11;3840:21; 3875:10;3910:6 <b>stepped (1)</b> 3843:4 <b>steps (3)</b> 3803:11;3836:24; 3839:9 <b>stick (1)</b> 3793:22 <b>still (23)</b> 3730:8,12;3769:25; 3775:14;3780:9; 3835:15;3842:25; 3846:11;3847:4,13,25; 3848:1;3863:9;3868:7, 8;3869:10;3886:22; 3904:15;3907:17; 3922:23;3927:17; 3928:8;3947:18 <b>stipulating (1)</b> 3844:8 <b>stock (5)</b> 3914:7,12,17; 3939:24;3940:3 <b>stolen (1)</b> 3946:22 <b>stood (1)</b> 3910:18 <b>stop (4)</b> 3830:18;3838:16; 3841:2;3874:25 <b>stopped (2)</b> 3801:12;3918:19 <b>store (1)</b>	3881:22 <b>stored (1)</b> 3896:9 <b>story (2)</b> 3893:13,19 <b>strengthened (2)</b> 3923:8,9 <b>strengthening (1)</b> 3917:25 <b>stretch (1)</b> 3904:13 <b>strictly (5)</b> 3805:16,17,20,21,22 <b>strike (4)</b> 3734:24;3754:4; 3787:8;3811:4 <b>strive (1)</b> 3886:6 <b>Stroman (1)</b> 3881:5 <b>strong (3)</b> 3783:20,24;3785:13 <b>structure (2)</b> 3774:16;3775:6 <b>student (1)</b> 3877:1 <b>students (3)</b> 3877:7;3880:23; 3915:16 <b>studies (1)</b> 3907:12 <b>stuff (4)</b> 3734:8;3819:11; 3830:8;3866:8 <b>style (3)</b> 3814:2,4;3865:5 <b>subject (9)</b> 3740:15;3870:16,18; 3884:20,24,25;3890:2; 3894:15;3918:11 <b>subjected (2)</b> 3893:4,6 <b>subjects (1)</b> 3904:10 <b>submit (5)</b> 3735:10;3737:10; 3768:3;3905:17; 3943:5 <b>submitted (2)</b> 3911:17;3936:5 <b>subordinated (4)</b> 3823:22;3831:14; 3859:13;3860:4 <b>subordinating (1)</b> 3823:14 <b>subpoenas (1)</b> 3747:11 <b>substance (4)</b> 3843:1;3946:5,9,17 <b>succeed (2)</b> 3878:25;3909:15 <b>successful (1)</b> 3878:22
--	--	---	--	--

NYAG v  
NRA

February 8, 2024

<p><b>sufficiently (3)</b> 3781:13,21;3782:1</p> <p><b>suggested (2)</b> 3817:17;3934:9</p> <p><b>suggestion (1)</b> 3778:15</p> <p><b>suggestions (5)</b> 3901:22,24;3902:3,4;3934:11</p> <p><b>suggests (1)</b> 3851:11</p> <p><b>Sullivan (9)</b> 3731:9;3793:9,11,13,21,24;3794:12;3806:12;3808:9</p> <p><b>Sullivan's (1)</b> 3794:11</p> <p><b>sum (1)</b> 3945:6</p> <p><b>summarize (3)</b> 3745:25;3849:16;3850:2</p> <p><b>summarized (2)</b> 3734:6;3800:8</p> <p><b>Summary (3)</b> 3734:7,14;3746:24</p> <p><b>summation (2)</b> 3802:24;3848:6</p> <p><b>Summations (2)</b> 3849:5;3850:4</p> <p><b>summer (4)</b> 3813:14;3874:16;3898:8,13</p> <p><b>Supernaugh (2)</b> 3840:19,20</p> <p><b>superseded (1)</b> 3887:20</p> <p><b>supervise (1)</b> 3895:6</p> <p><b>supervision (1)</b> 3881:1</p> <p><b>supervisor (1)</b> 3812:22</p> <p><b>supplemental (2)</b> 3770:16,17</p> <p><b>supplies (3)</b> 3836:3;3839:24,24</p> <p><b>support (12)</b> 3861:23;3886:1,1;3901:18;3905:16;3911:7;3913:7,18;3916:21;3917:3;3941:17,18</p> <p><b>supported (2)</b> 3911:12;3917:15</p> <p><b>supporting (2)</b> 3760:5;3917:10</p> <p><b>supportive (1)</b> 3861:16</p> <p><b>supposed (1)</b> 3915:11</p> <p><b>sure (32)</b> 3737:6;3739:6;</p>	<p>3744:1;3754:25; 3758:5;3760:15; 3763:14;3764:9; 3771:1,14;3780:14; 3787:7;3807:8;3813:6; 3829:25;3844:12,25; 3848:17;3852:17; 3856:6;3893:12; 3894:18;3895:3,7,8; 3899:16;3915:10; 3918:8;3923:8; 3928:13;3930:1; 3937:21</p> <p><b>surprise (1)</b> 3878:17</p> <p><b>surprised (1)</b> 3844:14</p> <p><b>Susan (2)</b> 3871:9,10</p> <p><b>sustain (1)</b> 3805:6</p> <p><b>sustained (8)</b> 3776:18;3825:17; 3826:5;3914:3; 3927:25;3944:5,13,13</p> <p><b>Switching (2)</b> 3834:15;3940:5</p> <p><b>swore (1)</b> 3784:18</p> <p><b>sworn (4)</b> 3738:22;3789:20; 3812:3;3875:14</p> <p><b>sworn/affirmed (1)</b> 3852:23</p> <p><b>sync (1)</b> 3803:2</p> <p><b>system (3)</b> 3829:4;3835:22; 3838:10</p> <p><b>systems (3)</b> 3827:14;3828:21,22</p>	<p>3831:19;3849:1; 3858:3;3860:10; 3866:8;3869:2; 3870:16;3871:23; 3886:4,11,24;3890:5, 22;3892:3;3916:2; 3948:7,9,14</p> <p><b>talked (22)</b> 3749:17;3755:3; 3770:14;3771:1; 3777:6,6;3778:4; 3787:16;3796:10; 3818:16;3824:24; 3839:21;3841:23; 3860:16;3866:24; 3870:6,10,18;3910:21; 3911:14;3918:11,14</p> <p><b>talking (19)</b> 3734:10;3750:11; 3755:18;3761:2; 3799:6,13;3805:7; 3814:25;3816:14; 3842:2;3855:9; 3858:15;3860:15; 3868:16,25;3886:22; 3912:8;3941:6,10</p> <p><b>talks (2)</b> 3739:20;3821:22</p> <p><b>tape (1)</b> 3877:6</p> <p><b>target (1)</b> 3893:7</p> <p><b>targeted (1)</b> 3805:15</p> <p><b>targets (1)</b> 3890:12</p> <p><b>task (1)</b> 3793:17</p> <p><b>taught (4)</b> 3880:18,21,21,21</p> <p><b>tax (19)</b> 3742:12,15,20,22,25; 3768:23,24;3769:16; 3770:6,18;3790:21,21; 3791:9,21;3817:5; 3829:22;3864:18; 3873:21,22</p> <p><b>taxable (1)</b> 3834:19</p> <p><b>taxed (1)</b> 3772:2</p> <p><b>teach (4)</b> 3830:8;3878:22; 3880:15,20</p> <p><b>teaching (1)</b> 3830:17</p> <p><b>team (2)</b> 3742:24;3791:18</p> <p><b>tech (1)</b> 3810:19</p> <p><b>technical (1)</b> 3763:8</p> <p><b>Technology (2)</b></p>	<p>3821:12,13</p> <p><b>Tedrick (8)</b> 3813:18;3814:20; 3826:24;3863:23; 3864:8;3868:7,8,9</p> <p><b>Tedrick's (2)</b> 3868:5,5</p> <p><b>telephone (4)</b> 3932:20,22,24,25</p> <p><b>Television (3)</b> 3819:2;3820:2; 3908:5</p> <p><b>telling (5)</b> 3781:24;3821:7; 3912:13;3925:16; 3932:7</p> <p><b>ten (6)</b> 3851:23;3878:2,7; 3897:11;3908:6; 3928:22</p> <p><b>tends (1)</b> 3872:21</p> <p><b>Tenenbaum (6)</b> 3733:1;3734:2; 3795:14,15,17;3796:17</p> <p><b>tenor (1)</b> 3885:11</p> <p><b>term (7)</b> 3834:17;3892:12; 3894:25;3901:21; 3908:12;3914:18,20</p> <p><b>terminated (2)</b> 3801:11;3828:20</p> <p><b>terms (21)</b> 3748:5,6;3750:4,5,6; 3755:4;3756:13; 3757:10;3759:1; 3761:4;3764:21; 3769:3;3805:4; 3845:12,19;3852:16; 3883:22;3909:9,23; 3946:18;3948:4</p> <p><b>test (8)</b> 3754:16;3786:7,10; 3788:15,17;3795:19, 21;3848:15</p> <p><b>testified (32)</b> 3730:24;3738:23; 3779:14;3786:7; 3789:21;3792:1; 3803:20;3806:12,18; 3809:15;3812:4; 3821:17,18;3822:19; 3837:23;3852:25; 3858:17;3860:19; 3865:9;3866:23; 3870:1;3871:3,25; 3874:4;3875:15; 3911:24;3913:19; 3928:1;3931:19,23; 3940:11;3946:14</p> <p><b>testify (19)</b> 3731:11;3733:1;</p>	<p>3745:1;3748:6; 3750:15;3759:23; 3772:8,19,22;3781:3; 3793:24;3802:8; 3808:11;3811:5; 3848:11;3868:22; 3870:10,17,23</p> <p><b>testifying (10)</b> 3731:10;3739:21; 3749:22;3766:16; 3800:15;3804:11; 3818:8;3855:3; 3860:17;3938:6</p> <p><b>testimony (69)</b> 3731:17;3732:13,17; 3734:12;3742:5,6,11, 12;3743:7;3744:4,13, 16,21;3749:25;3750:1; 3755:21;3758:10; 3769:12;3770:12; 3772:11;3775:12; 3776:7,14;3779:6; 3780:7;3781:12; 3785:4;3791:2;3793:9; 3795:4,13,18,19,22; 3796:10,14,16,17; 3797:7,19;3803:14; 3805:25;3807:14,22; 3809:22,23,25; 3821:20;3822:4; 3837:14;3842:12; 3843:1,1;3845:24; 3864:2;3870:5,19; 3872:7,19;3874:5; 3897:15;3904:16; 3905:25;3922:20; 3924:1;3928:5;3940:8; 3946:11;3947:21</p> <p><b>testing (4)</b> 3759:24,24;3782:21, 24</p> <p><b>Texas (1)</b> 3898:11</p> <p><b>texted (2)</b> 3933:4,6</p> <p><b>thanked (1)</b> 3934:3</p> <p><b>Thanks (2)</b> 3842:18;3926:18</p> <p><b>Thanksgiving (1)</b> 3832:6</p> <p><b>thereby (1)</b> 3780:5</p> <p><b>therefore (2)</b> 3732:4;3765:19</p> <p><b>thick (1)</b> 3887:16</p> <p><b>thinking (6)</b> 3823:23;3846:18,19, 23;3847:12;3948:6</p> <p><b>third (6)</b> 3746:7;3859:4,6; 3879:8;3884:6;</p>
	<b>T</b>			
	<p><b>Tab (4)</b> 3856:5;3858:8,11; 3881:24</p> <p><b>table (3)</b> 3816:5;3866:10; 3867:18</p> <p><b>talents (1)</b> 3899:15</p> <p><b>talk (44)</b> 3732:7;3746:25; 3747:1;3749:9; 3750:11,22;3753:1; 3754:4;3755:6,22; 3756:6;3758:8;3759:6; 3760:9;3761:14; 3763:1,8;3767:15; 3771:10;3774:19; 3789:10;3799:14,17; 3813:13;3815:6,8;</p>			

NYAG v  
NRA

February 8, 2024

3935:25 <b>thirty (2)</b> 3892:14;3931:2 <b>Thompson (22)</b> 3821:16;3823:16; 3830:3;3835:2;3845:6; 3846:7,10,23;3851:21; 3852:6;3853:10,11,13; 3854:12,15,19; 3855:21,25;3856:4; 3862:8;3874:3;3875:9 <b>thorough (2)</b> 3803:19;3925:10 <b>though (5)</b> 3745:17,19;3903:14; 3912:18;3923:20 <b>thought (13)</b> 3732:24,24,25; 3824:11;3900:15; 3911:5;3918:13; 3920:20;3921:1,8; 3923:2,13;3928:18 <b>thoughts (1)</b> 3777:8 <b>thousand (3)</b> 3815:22;3840:16; 3890:12 <b>thousands (1)</b> 3749:11 <b>threats (1)</b> 3919:4 <b>three (27)</b> 3740:17;3750:12; 3791:22;3814:15; 3815:21,22;3823:13; 3824:11;3825:7; 3827:18;3828:21,21; 3831:13;3866:14; 3892:13,15;3894:1,12; 3898:6;3900:17,24; 3902:15,16,17;3907:4; 3912:22;3935:21 <b>three-year (1)</b> 3894:25 <b>threshold (1)</b> 3785:18 <b>throughout (2)</b> 3884:11;3947:21 <b>Thursday (4)</b> 3735:19,25;3846:16; 3848:21 <b>tied (1)</b> 3794:13 <b>till (1)</b> 3948:1 <b>timeframe (1)</b> 3835:1 <b>timeline (1)</b> 3753:22 <b>times (18)</b> 3765:17;3777:12; 3778:2;3792:6,12; 3796:22;3804:22;	3814:15;3866:14; 3870:25;3892:14; 3894:12;3912:22; 3916:8,9;3925:4; 3930:10;3933:6 <b>timing (10)</b> 3831:21,22;3832:19; 3842:7;3853:22; 3854:21;3855:22; 3857:2;3874:3,13 <b>tiny (1)</b> 3783:14 <b>tired (1)</b> 3880:14 <b>titled (1)</b> 3734:7 <b>today (26)</b> 3735:25;3781:24; 3782:12;3790:10,15, 19;3795:10,19; 3806:22;3838:3; 3845:9;3848:4,7; 3856:6;3861:5;3862:1; 3869:10;3870:5,19,23; 3871:25;3872:7,16; 3917:12;3918:2; 3944:17 <b>together (18)</b> 3748:24;3774:13; 3779:23;3815:7; 3816:2,6;3825:2,2,8; 3848:21;3867:20; 3872:25;3873:4,9; 3885:25;3887:10; 3915:23;3947:20 <b>told (9)</b> 3736:3,4;3778:10; 3819:16;3893:19; 3913:2,10;3922:5; 3923:15 <b>tomorrow (5)</b> 3736:16,20;3948:8, 9,14 <b>tone (2)</b> 3787:18,20 <b>took (15)</b> 3738:22;3789:21; 3795:21;3799:2; 3801:20;3812:4; 3828:9;3836:24; 3842:11;3875:15; 3879:15;3880:13; 3881:18;3904:4; 3925:17 <b>tools (3)</b> 3758:4,9;3793:18 <b>top (27)</b> 3734:18;3775:6,10, 14;3779:4;3780:15; 3787:18,20;3817:20; 3818:3;3821:6;3826:7; 3827:21;3830:19; 3842:3,10;3855:10,14,	21,23;3858:14,21,25; 3859:4;3861:7,17; 3932:20 <b>topic (4)</b> 3807:14;3814:24; 3841:23,23 <b>topics (4)</b> 3834:15;3890:16; 3916:6;3940:5 <b>topmost (1)</b> 3857:5 <b>total (4)</b> 3748:25;3823:2; 3849:3;3909:16 <b>totality (1)</b> 3825:12 <b>totalled (1)</b> 3799:21 <b>totally (2)</b> 3795:22;3796:24 <b>touch (1)</b> 3731:6 <b>touched (2)</b> 3732:23;3889:23 <b>tough (3)</b> 3814:8;3847:9; 3910:2 <b>towards (1)</b> 3832:4 <b>track (3)</b> 3829:13,16;3832:13 <b>tracks (2)</b> 3839:9;3846:17 <b>traditionally (2)</b> 3741:21;3845:2 <b>trail (1)</b> 3841:21 <b>train (2)</b> 3738:3;3884:23 <b>training (12)</b> 3753:14;3784:10; 3793:19;3884:22; 3888:15,19,24,25; 3889:1;3891:4; 3898:17;3941:7 <b>trainings (1)</b> 3889:4 <b>transaction (13)</b> 3745:18,22;3746:6; 3755:1,1,11;3760:6,7; 3781:15,25;3822:21; 3823:1;3830:10 <b>transactions (50)</b> 3732:17;3746:13,15; 3748:10;3750:24; 3751:1,4;3754:9,12,14, 15,16,18;3755:8,9,24; 3757:1,2,4,6,14,15,17, 19,21;3758:5,12,12,24; 3759:2,11,16,24; 3760:2,3,4,5;3800:8,9, 9;3809:7,20;3810:1; 3815:14,16,17;	3818:14;3865:11,15; 3925:12 <b>transcripts (3)</b> 3742:8;3795:5,6 <b>travel (7)</b> 3801:21;3821:14; 3828:3;3830:20,21; 3836:4;3874:20 <b>treasurer (15)</b> 3744:3;3774:14; 3813:22;3840:22,24; 3841:13,15;3863:9; 3864:10,15;3907:8; 3939:11,13,20;3940:2 <b>treasurer's (3)</b> 3840:21;3841:6; 3917:2 <b>treasury (1)</b> 3864:17 <b>treated (1)</b> 3943:25 <b>treatment (1)</b> 3844:20 <b>trial (9)</b> 3735:3;3748:23; 3752:7;3775:11; 3795:5,13;3821:17; 3870:1;3948:18 <b>trials (2)</b> 3735:11;3736:5 <b>trickle (1)</b> 3847:10 <b>tried (9)</b> 3733:16;3737:22; 3797:5;3861:1; 3880:14;3881:14,22; 3884:11;3904:5 <b>trier (1)</b> 3809:14 <b>trip (2)</b> 3801:20,21 <b>trouble (4)</b> 3739:3;3881:2; 3912:14,25 <b>troubling (1)</b> 3815:23 <b>true (7)</b> 3784:6;3841:16; 3842:5;3902:14; 3903:4,4;3928:8 <b>truly (1)</b> 3819:8 <b>Trust (3)</b> 3796:3;3901:11; 3903:10 <b>trusts (1)</b> 3884:18 <b>truth (1)</b> 3784:18 <b>try (11)</b> 3737:1;3758:3; 3787:8,11;3793:22; 3816:6;3827:24;	3858:3;3862:2;3890:5; 3902:23 <b>trying (12)</b> 3735:22;3737:12; 3746:24;3764:4; 3772:14;3786:21; 3804:15;3818:13; 3877:6,6;3881:1; 3918:14 <b>Tucson (1)</b> 3896:25 <b>Tuesday (5)</b> 3794:1,2;3847:19; 3947:10,13 <b>tumultuous (1)</b> 3919:3 <b>Turbo (1)</b> 3829:22 <b>turn (3)</b> 3776:1;3889:7,19 <b>TV (2)</b> 3878:14;3908:10 <b>twice (1)</b> 3874:17 <b>two (35)</b> 3731:1;3736:17; 3737:12;3744:2,4; 3758:22,24;3792:25; 3795:17;3796:9; 3801:9;3810:21; 3814:14;3815:8; 3821:2;3825:7; 3826:14,17;3834:5; 3841:1,1;3846:24; 3847:14,19;3848:5; 3852:7,11,18;3863:19; 3871:1;3880:18; 3889:4;3896:6;3909:9; 3911:13 <b>type (10)</b> 3745:10;3752:2; 3770:19;3771:9; 3774:6;3814:21; 3828:2;3834:23; 3838:12;3841:11 <b>types (7)</b> 3745:14;3752:13; 3753:14;3759:2; 3792:16;3808:24; 3835:18 <b>typically (10)</b> 3734:20;3741:6; 3751:15;3754:12; 3758:23;3769:5; 3771:15,23;3776:25; 3778:21
<b>U</b>				
<b>ultimate (1)</b> 3742:24 <b>ultimately (14)</b> 3764:16;3766:19;				

NYAG v  
NRA

February 8, 2024

3769:4;3771:19; 3772:6;3804:19; 3838:2;3845:15; 3861:19;3885:8; 3893:21;3903:11; 3909:23;3935:1 <b>Um (1)</b> 3839:5 <b>unaware (6)</b> 3942:25;3943:3,4,6, 23;3944:1 <b>uncommon (1)</b> 3792:9 <b>uncover (1)</b> 3759:16 <b>under (13)</b> 3745:7;3749:2; 3756:16;3772:24; 3774:2,5;3840:11; 3860:20;3881:1; 3899:5;3907:25; 3909:4;3946:7 <b>underlying (3)</b> 3745:19;3760:4; 3926:4 <b>Understood (6)</b> 3738:4;3779:13; 3781:12;3809:1; 3841:2;3918:5 <b>undertakes (1)</b> 3769:10 <b>undertone (1)</b> 3749:2 <b>United (3)</b> 3798:3;3873:25; 3941:5 <b>universe (1)</b> 3802:4 <b>University (5)</b> 3739:9;3790:17; 3876:10;3880:15; 3915:24 <b>unknown (1)</b> 3943:11 <b>unless (4)</b> 3766:15;3849:7; 3885:18;3894:10 <b>unmodified (2)</b> 3749:12;3780:1 <b>unpaid (1)</b> 3905:22 <b>unqualified (2)</b> 3807:13,22 <b>unremarkable (1)</b> 3876:9 <b>unsupported (1)</b> 3731:6 <b>untrue (1)</b> 3893:17 <b>unwritten (1)</b> 3917:19 <b>up (67)</b> 3730:2;3731:18;	3734:14;3735:3; 3738:3;3740:5; 3741:22;3757:13; 3766:19;3775:21; 3784:20;3795:6; 3799:3;3804:20; 3808:1;3809:14; 3815:19;3817:18,19; 3818:10;3819:6; 3829:10;3831:20; 3835:23;3839:19; 3840:13;3841:20; 3848:9;3854:11; 3855:25;3858:11; 3866:7,11;3872:20; 3876:1,3,5,9;3877:7,7, 7,21;3879:11;3881:15; 3885:5,14;3886:22; 3887:25;3888:13; 3890:1;3900:3; 3902:22;3907:25; 3909:16;3910:6; 3912:7;3922:13; 3923:21;3925:16; 3932:3,16;3934:19; 3937:11;3940:16; 3941:22;3947:24; 3948:13 <b>upcoming (1)</b> 3896:12 <b>updated (3)</b> 3830:23;3874:21; 3917:23 <b>updating (3)</b> 3874:18;3917:25; 3940:11 <b>upon (5)</b> 3735:9;3777:5; 3808:9;3939:6; 3943:19 <b>upset (1)</b> 3899:25 <b>urging (3)</b> 3911:13;3914:8,8 <b>use (13)</b> 3730:23,25;3731:10; 3766:10;3774:15; 3787:3;3791:13; 3804:25;3873:22; 3878:8;3883:19; 3934:11;3941:8 <b>used (23)</b> 3748:1;3768:21; 3769:16;3791:15; 3831:5,9,10,16;3835:7, 9;3845:23;3853:17,19; 3858:19,19;3867:20; 3868:6;3879:21; 3880:25;3895:19; 3910:2;3934:13; 3943:1 <b>user (2)</b> 3731:9;3750:8	<b>using (5)</b> 3766:9;3793:18; 3801:23;3855:6; 3913:17 <b>usually (11)</b> 3803:24;3841:7; 3863:19;3892:20; 3894:25;3896:5,6; 3898:7,9,11,17 <b>utilize (2)</b> 3746:19;3759:12 <b>utilized (4)</b> 3769:7,8,17;3777:7  <b>V</b> <b>Vaguely (1)</b> 3930:19 <b>valid (1)</b> 3801:21 <b>validate (1)</b> 3770:17 <b>Valley (1)</b> 3880:16 <b>valuable (2)</b> 3730:25;3918:13 <b>valuations (1)</b> 3791:1 <b>value (2)</b> 3890:15;3909:14 <b>variance (2)</b> 3829:9,10 <b>variances (1)</b> 3833:3 <b>varied (1)</b> 3906:25 <b>various (10)</b> 3744:21;3746:4; 3747:11,11;3748:20; 3772:5;3817:1,2; 3915:6,7 <b>vendor (5)</b> 3754:23;3827:17; 3828:4,16;3838:13 <b>vendors (22)</b> 3801:8,9,9,14,18; 3810:9;3823:14,15,22; 3826:7,21;3827:13,20, 21;3828:5;3831:14; 3837:23;3859:14,22; 3860:1,5;3946:22 <b>verified (1)</b> 3747:10 <b>verify (2)</b> 3782:21;3796:4 <b>version (1)</b> 3935:1 <b>versions (2)</b> 3764:25;3882:1 <b>versus (3)</b> 3751:10;3874:24; 3897:20 <b>vet (1)</b>	3805:16 <b>vetting (1)</b> 3805:13 <b>vice (2)</b> 3887:10,13 <b>Vice-Chair (2)</b> 3899:6;3901:25 <b>vice-president (15)</b> 3905:23,23;3906:14; 3907:5,6,8,11,17,23; 3908:1,14;3909:6,8; 3910:6;3912:11 <b>Victim (1)</b> 3837:2 <b>view (12)</b> 3733:7,13,16; 3765:1,24;3815:9; 3908:17;3913:22; 3914:11;3926:1,16; 3942:12 <b>viewed (1)</b> 3780:15 <b>views (4)</b> 3885:22;3886:12,13; 3925:22 <b>vigorous (2)</b> 3886:18;3912:3 <b>vigorously (1)</b> 3911:25 <b>violated (4)</b> 3781:22;3782:6; 3786:17,25 <b>violation (2)</b> 3745:20,21 <b>violations (1)</b> 3782:2 <b>Virginia (1)</b> 3921:15 <b>vis (2)</b> 3742:15,15 <b>vis-a-vis (1)</b> 3802:14 <b>visiting (2)</b> 3876:7;3880:18 <b>volume (1)</b> 3778:17 <b>volunteer (6)</b> 3877:3;3887:5; 3906:14;3907:4; 3912:8;3916:19 <b>vote (21)</b> 3883:15;3885:8; 3892:10;3895:4; 3896:1;3897:4;3899:2; 3900:11,12,22; 3901:19;3902:3,4,6,16; 3903:8;3912:15; 3913:2;3914:8; 3931:16;3932:7 <b>voted (5)</b> 3883:15;3902:9; 3920:16;3921:1; 3922:23	<b>votes (1)</b> 3936:17 <b>voting (3)</b> 3892:10;3896:2; 3931:14 <b>vouch (1)</b> 3760:4 <b>vouching (1)</b> 3730:15  <b>W</b>  <b>wait (1)</b> 3845:20 <b>waiting (1)</b> 3810:22 <b>walk (2)</b> 3746:1;3751:1 <b>walking (2)</b> 3730:4;3921:18 <b>walks (1)</b> 3885:23 <b>WANG (33)</b> 3882:4;3883:25; 3889:11;3903:17; 3913:25;3914:14; 3920:5;3926:19,20; 3927:2,5,8;3928:1,4, 10;3930:13;3931:3; 3932:4,10,14,19; 3933:10;3934:15,18, 20;3935:4,11;3937:7, 19;3942:20;3944:4,12; 3946:10 <b>wants (6)</b> 3846:21;3858:24; 3891:8;3900:4,12; 3913:11 <b>wardrobe (10)</b> 3943:24,24,25; 3944:1,8,10,18,19,22; 3945:2 <b>waste (1)</b> 3846:3 <b>wasted (1)</b> 3849:19 <b>watch (1)</b> 3878:20 <b>watching (1)</b> 3849:16 <b>water (1)</b> 3813:5 <b>waters (1)</b> 3923:23 <b>way (34)</b> 3762:18;3766:10; 3768:22;3771:5; 3773:7;3778:18; 3779:22;3782:1; 3797:4;3803:25; 3807:19,25;3829:17; 3838:24;3839:9; 3841:14;3852:20;
--	---	--	--	---

NYAG v  
NRA

February 8, 2024

3868:18;3878:8; 3886:18,25;3898:4; 3900:11;3902:9; 3906:23;3908:13; 3912:7,13;3922:2; 3930:2;3944:6;3945:1; 3946:1;3947:22	3781:6;3800:16; 3806:8;3829:10; 3864:14;3868:1; 3871:10;3891:3; 3892:16;3914:16	3771:9;3774:9; 3777:21;3782:17; 3794:23;3827:10,20; 3829:18;3832:25; 3836:9;3842:12; 3874:7;3885:2;3928:5, 9;3931:9;3943:1,12; 3944:2,10	12;3866:8,14;3938:4	<b>worries (1)</b> 3838:18
<b>Wayne (32)</b> 3823:24;3826:8,9, 11,25;3831:11,18; 3834:6,13;3858:6; 3900:8,11;3901:2; 3902:9,25;3903:1,14, 21,22,25;3904:2,3, 3907:17;3910:6,15; 3912:14,16;3915:5; 3916:15;3918:16; 3922:23;3942:5	<b>whatsoever (1)</b> 3782:5	<b>without (9)</b> 3731:5;3770:21; 3774:21;3785:9,14; 3800:21;3823:8; 3861:22;3947:20	<b>word (7)</b> 3831:10,16;3865:17; 3867:20;3872:19; 3883:19;3923:13	<b>worth (2)</b> 3836:20;3845:24
<b>Wayne's (2)</b> 3903:25;3913:1	<b>whenever (1)</b> 3735:18	<b>witness (81)</b> 3730:17,24;3738:17, 21,23,25;3739:4,19; 3743:6;3744:13; 3745:23;3766:4,15; 3769:23;3773:11; 3779:5;3786:2;3788:2, 23;3789:7,16,19,21,23; 3790:9;3791:2; 3804:23;3805:2,7,24; 3809:13;3810:13; 3811:14,18,20,25; 3812:2,4,6,8;3813:5,9, 10;3819:17;3820:24; 3825:24;3837:15; 3838:7;3843:3,4; 3846:9;3847:19; 3848:10;3851:7; 3852:9,22,24;3853:9; 3856:1,3,4;3858:23; 3875:13,15,17; 3904:17,21,21; 3923:25;3928:5; 3930:13,15;3932:10, 13;3934:15,17,20; 3937:19;3942:1; 3944:14;3947:8	<b>words (8)</b> 3785:10;3804:25; 3831:8;3933:21; 3934:13;3946:5,9,12	<b>Wow (1)</b> 3915:14
<b>ways (5)</b> 3886:23;3890:9; 3891:19;3909:25; 3947:25	<b>whereupon (20)</b> 3738:13;3789:3,5, 13;3811:14;3842:22; 3843:4,5;3852:22; 3853:3;3882:6; 3889:14;3904:18,20, 23;3931:6;3933:13; 3935:7;3947:15; 3948:18	<b>witnessed (1)</b> 3823:1	<b>work (87)</b> 3730:13,15;3731:23; 3732:2,6,21;3733:10, 12;3734:16;3735:12; 3736:22;3739:12; 3740:20,25;3741:7,10, 14,15;3742:22;3743:3, 15,16,17;3746:16; 3747:16,17;3748:2; 3749:3;3754:22; 3759:22;3771:16; 3773:3,12,13,15; 3774:13;3777:9; 3785:5;3786:11; 3787:3,7,10;3788:15, 17;3791:1,9,10,11; 3793:23;3794:8; 3795:1,9;3796:7; 3797:16;3799:5; 3803:14,18;3804:4,18; 3810:11;3828:7,8,9,10; 3830:12;3832:4,24; 3848:1;3851:9; 3852:11;3864:17; 3879:11,13,19; 3884:17;3897:11; 3899:15;3906:6,7,7; 3910:15;3915:13; 3916:20;3917:10; 3921:23;3925:11; 3926:3	<b>WPX (5)</b> 3934:22,24;3935:7, 9;3936:11
<b>wear (1)</b> 3744:4	<b>wherever (2)</b> 3829:7,24	<b>woman (2)</b> 3878:13;3880:3	<b>wrong (5)</b> 3785:22;3841:3; 3874:7;3885:18; 3913:6	<b>wrote (4)</b> 3859:11;3878:15; 3893:19;3945:3
<b>website (2)</b> 3760:21,22	<b>whistle (2)</b> 3746:6;3782:10	<b>women (9)</b> 3878:1,2,3,5,19; 3879:1;3884:23; 3941:12,13	<b>wrote (4)</b> 3859:11;3878:15; 3893:19;3945:3	
<b>Wednesday (6)</b> 3846:15;3847:22; 3848:9,24;3849:10; 3852:12	<b>whistleblower (29)</b> 3747:13;3760:10,15, 21,23;3761:8,10,13,15, 17;3762:1,2,6,7,11; 3763:13,14,23,25; 3764:5,6,18;3765:6,18; 3767:3,10,13;3782:13, 17	<b>women's (1)</b> 3880:6		<b>Y</b>
<b>week (10)</b> 3737:23;3793:9; 3827:10,20;3832:5; 3842:12;3848:8; 3852:15;3858:13; 3896:6	<b>whistleblowers (7)</b> 3760:9;3762:22; 3763:6,9;3764:10; 3765:12;3766:23	<b>won (1)</b> 3913:22		<b>yards (1)</b> 3890:12
<b>weeks (2)</b> 3849:4;3870:2	<b>whistleblowing (1)</b> 3842:10	<b>Woody (14)</b> 3818:25;3822:9; 3823:5,24;3826:9,10, 11;3831:11,18;3834:7,		<b>year (38)</b> 3778:22,22;3797:19; 3813:23,24;3832:16, 16,25;3845:2;3866:14; 3874:17,17;3888:19; 3889:3;3892:6,10; 3894:12;3896:24,24; 3897:5;3898:7,23; 3908:1,15,15;3909:10, 10;3911:23;3912:22; 3916:8,9;3922:23; 3925:4;3928:11; 3929:14;3939:14; 3945:2;3946:1
<b>weird (1)</b> 3876:6	<b>whole (3)</b> 3747:23;3859:23; 3892:7			<b>years (41)</b> 3739:18;3740:1,6, 17,23;3744:3;3746:14; 3753:25;3756:4; 3761:22;3768:13; 3782:3;3786:15,23; 3791:12;3814:10; 3818:23;3827:18; 3880:18;3890:18,21; 3891:14;3892:14,15; 3894:1;3895:11,15; 3896:3;3902:15,16,17; 3903:4;3909:16,17; 3911:3;3912:10,19; 3917:23;3928:14,22; 3931:2
<b>Welcome (6)</b> 3738:15;3811:24; 3812:17;3853:5,8; 3905:6	<b>who's (1)</b> 3897:2			<b>yesterday (13)</b> 3730:11;3735:14; 3736:1;3737:20;
<b>welfare (1)</b> 3834:18	<b>whose (4)</b> 3731:16;3820:9; 3884:25;3907:2			
<b>well-known (1)</b> 3908:4	<b>widgets (1)</b> 3839:13			
<b>weren't (7)</b> 3730:5;3737:20; 3791:17;3824:14; 3827:25;3929:5; 3938:24	<b>William (2)</b> 3924:9;3927:5			
<b>western (1)</b> 3898:19	<b>willing (4)</b> 3906:16,17;3910:10; 3941:17			
<b>WGBH (1)</b> 3878:14	<b>Wilson (1)</b> 3826:24			
<b>what's (17)</b> 3740:15;3748:15,21; 3749:12;3751:10; 3752:12;3767:24;	<b>win (1)</b> 3887:2			
	<b>winter (1)</b> 3898:7			
	<b>wish (2)</b> 3774:7,8			
	<b>within (26)</b> 3734:11;3751:24; 3753:12;3760:20; 3768:14;3770:12;			



**NYAG v  
NRA**

**February 8, 2024**

<p>3781:7  <b>98 (1)</b>  3906:23  <b>990 (23)</b>  3742:23;3743:1;  3757:12,16,16,20;  3758:15;3768:4,12,18,  21;3769:1,5,6,8,11,16;  3774:4;3782:22;  3813:3;3829:21;  3873:23;3929:17  <b>990s (10)</b>  3844:8,14,16,22,25;  3918:6;3929:18;  3940:17,19,23</p>				
---	--	--	--	--