

# Exhibit B

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1 SUPREME COURT OF THE STATE OF NEW YORK  
2 COUNTY OF NEW YORK

3 PEOPLE OF THE STATE OF )  
NEW YORK, BY LETICIA )  
4 JAMES ATTORNEY GENERAL OF ) Index No.  
THE STATE OF NEW YORK, ) 451625/2020

5 )  
Plaintiffs, )

6 ) VIDEOCONFERENCE/  
vs. ) VIDEOTAPED

7 )  
THE NATIONAL RIFLE ) DEPOSITION OF  
8 ASSOCIATION OF AMERICA, )  
INC., WAYNE LAPIERRE, ) PETER R. BROWNELL  
9 WILSON PHILLIPS, JOHN )  
FRAZER, AND JOSHUA POWELL )

10 )  
Defendants. )

11 )  
----- )

12 THE VIDEOCONFERENCE/VIDEOTAPED  
13 DEPOSITION OF PETER R. BROWNELL, taken before  
14 Gale Sweeney Christensen, Certified Shorthand  
15 Reporter, Registered Professional Reporter,  
16 and Notary Public of the State of Iowa,  
17 commencing at 9:37 a.m., October 1, 2021, at  
18 Suite 3300, 801 Grand Avenue, Des Moines,  
19 Iowa.

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24 Reported by: Gale Sweeney Christensen,  
CSR, RPR

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1 firm Veritext New York. Counsel and all  
2 present in the room and everyone attending  
3 remotely will now state their appearance and  
4 affiliation for the record.

5 MS. CONNELL: Monica Connell of the  
6 Attorney General of the State of New York for  
7 the People of the State of New York.

8 MR. KLINEFELDT: Nick Klinefeldt,  
9 and later joining me will be David Yoshimura,  
10 from the law firm of Faegre Drinker,  
11 appearing on behalf of Pete Brownell.

12 MS. EISENBERG: This is Svetlana  
13 Eisenberg, for attorneys and counselors  
14 appearing on behalf of the NRA. I'm joined  
15 by more Mordecai Geisler and Brooke  
16 Burschlag.

17 Good morning, Mr. Brownell. I just  
18 wanted to mention that from time to time I  
19 will be making objections when Ms. Connell  
20 asks you questions. And as Mr. Klinefeldt  
21 might have mentioned, until and unless  
22 someone instructs you not to answer the  
23 question, those are just procedural  
24 objections that are being placed on the  
25 record.

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1           Also from time to time I might  
2       enter an objection to an answer that you  
3       provide. Again, that is just a procedural  
4       statement that I must place on the record.

5           Later on -- and, Ms. Connell, I do  
6       anticipate that, depending on the substance  
7       of your questioning, I, and I suspect other  
8       defense counsel, would like an opportunity to  
9       cross-examine Mr. Brownell. I don't know how  
10      much time I will need. It will depend on the  
11      substance of the questioning by Ms. Connell.

12      So I suggest we touch base about that as the  
13      deposition proceeds.

14           My next point, Mr. Brownell, is  
15      that, as former officer and board member of  
16      the NRA, you were privy to certain privileged  
17      communications and have knowledge about the  
18      substance of communications, the privilege  
19      for which belongs to the NRA and/or the NRA  
20      board. So I am sure that some of the  
21      questions that Ms. Connell intends to ask  
22      intentionally seek to probe into privileged  
23      information belonging to the NRA or the NRA  
24      board. However, I just want to caution you  
25      that, if and when there is a question asked