

Exhibit 15

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:)
)
)
NATIONAL RIFLE) Case No.
ASSOCIATION OF AMERICA) 21-30085-hdh-11
AND SEA GIRT, LLC,)
)
Debtors.)

REMOTE ORAL AND VIDEOTAPED DEPOSITION OF
WAYNE LAPIERRE
VOLUME 1
IN HIS INDIVIDUAL CAPACITY AND
AS CORPORATE REPRESENTATIVE OF
THE NATIONAL RIFLE ASSOCIATION OF AMERICA
MARCH 22, 2021

CONFIDENTIAL PURSUANT TO PROPOSED PROTECTIVE ORDER

1 Go ahead and answer, if you can. If you need
2 the time to go through --

3 A. Section L --

4 Q. (BY MR. SHEEHAN) Schedule L, part V, lists
5 out one, two, three, four, five, six, seven, eight,
6 nine, ten people. Do you know how the NRA selected
7 their particular excess reimbursements for review?

8 MR. GARMAN: So just for clarity, here is
9 schedule L. We're on a screen that can only show part
10 of it. Schedule L has a list of names on the left-hand
11 side. I believe he is referring to the identity of the
12 names that fall in this first column on the left.

13 A. I don't know how they were selected.

14 Q. (BY MR. SHEEHAN) Okay. But if we look
15 through this, the NRA has a dispute with Joshua Powell.
16 Isn't that correct, at the current time?

17 MR. GARMAN: Your Honor -- I'm sorry.
18 Counsel, are you referring to -- it's on video -- bad
19 habit. Are you referring to a particular portion of the
20 document right now.

21 MR. SHEEHAN: No. I'm asking him more
22 generally.

23 Q. (BY MR. SHEEHAN) Does the NRA currently have
24 a dispute with Mr. Josh Powell about excess benefit
25 transactions?

1 A. I know that -- you would really need to ask
2 the attorneys on that. I know that Josh Powell has paid
3 back -- has written a check to the NRA for a substantial
4 amount. I don't know what the outstanding legal issues
5 are with Josh Powell that the NRA has.

6 Q. Okay. So if I look at Mr. Wilson Phillips, do
7 you know why there was no review of his credit card
8 charges for purposes of preparing schedule L?

9 MR. GARMAN: Objection to the form of the
10 question.

11 A. I have no idea.

12 Q. (BY MR. SHEEHAN) Okay. With respect to
13 Oliver North, do you know why his payments were selected
14 for review?

15 A. I don't.

16 Q. With respect to board member travel, do you
17 know why -- which board members were selected for
18 review?

19 A. I don't. I didn't do the selection. I don't
20 know.

21 Q. Who did the selection?

22 MR. CORRELL: Objection to the extent
23 that it calls for him to reveal any attorney/client
24 communication. This is Mr. Correll.

25 A. I don't know the answer to that.