

## **EXHIBIT AJ**

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS

IN RE: . Case No. 21-30085-HDH-11  
.  
NATIONAL RIFLE .  
ASSOCIATION OF AMERICA . Earle Cabell Federal Building  
and SEA GIRT LLC, . 1100 Commerce Street  
.  
Debtors. . Dallas, TX 75242-1496  
.  
April 8, 2021  
1:15 p.m.  
P.M. Session  
. . . . .

**AMENDED TRANSCRIPT OF MOTION TO DISMISS CASE**BEFORE HONORABLE HARLIN DeWAYNE HALE  
UNITED STATES BANKRUPTCY COURT JUDGE

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1 NRA as CFO. And am I correct that Mr. Spray joined the NRA as  
2 CFO in or about March OF 2018?

3 A Yes.

4 Q Okay. Before Mr. Spray was hired, the NRA had a culture  
5 where internal controls were bypassed or ignored because Mr.  
6 LaPierre, Mr. Phillips, or Mr. Powell said so, is that correct?

7 A I don't agree with that statement.

8 MR. THOMPSON: Okay. So Mr. Wang, if I could please  
9 ask you to bring up -- Your Honor, I believe this is our first  
10 piece of impeachment evidence that has not been included on our  
11 exhibit list. And so I will be laying the foundation and then  
12 if the exhibit is admitted, I will provide electronic copies to  
13 the Court, if that is acceptable.

14 THE COURT: Okay.

15 Q Ms. Rowling, can you see the document on your screen?

16 A No.

17 MR. THOMPSON: Let me know if you can stop sharing,  
18 I'll try and share it directly from my computer.

19 Q Are you able to see that, Ms. Rowling?

20 A No.

21 UNIDENTIFIED SPEAKER: Would you like us to go and  
22 see if we can assist in making the document visible for Ms.  
23 Rowling.

24 THE COURT: I think --

25 MR. GRUBER: This is Mike Gruber, again our

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1 technician is ready to, if you give her the exhibit number  
2 again she can put it on for you.

3 MR. THOMPSON: Unfortunately this is not an exhibit  
4 number, but I could provide you with the Bates stamp number.  
5 But it might be faster just for counsel to go and assist, which  
6 I would appreciate.

7 THE COURT: And the Court would too. Take your time  
8 to get there.

9 UNIDENTIFIED SPEAKER: Thank you, Mr. Garman is  
10 heading up to the witness room now to see if he can assist.

11 MR. GRUBER: Would you just call out to Stephanie if  
12 you have another one that you're having trouble getting out and  
13 she'll pull it up.

14 MR. THOMPSON: Yes, thank you, Mr. Gruber.

15 (Pause in proceedings to pull up exhibit)

16 (Counsel confer)

17 MR. THOMPSON: And Your Honor, I'll just let the  
18 Court know that this is the only document I anticipate needing  
19 to do this for, other than impeachment testimony. So hopefully  
20 we'll not have this issue any more.

21 THE COURT: It's okay, Mr. Thompson, we have some of  
22 these things happening from time to time.

23 (Counsel confer)

24 BY MR. THOMPSON:

25 Q Is that showing up, Ms. Rowling?

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1 preferred vendors, contractors, some of whom have no current  
2 contract or no contract, and then sub D as in David, is MMP  
3 bills by contract stipulations, do you see that?

4 A Yes.

5 Q And MMP there refers to Membership Marketing Partners, is  
6 that correct?

7 A Yes.

8 Q And that is another entity that is owned in whole or in  
9 part by Mr. McKenzie, is that correct?

10 A I believe so.

11 Q The NRA has a policy that governs the procurement of  
12 contracts that exceed \$100,000 in value in a given year, is  
13 that correct?

14 A Yes.

15 Q If you could please pull up Exhibit 142, NYAG Exhibit 142.

16 A I have it up.

17 Q Ms. Rowling, is this exhibit NYAG Exhibit 142, the  
18 procurement policy for contracts in excess of \$100,000 in a  
19 given year?

20 A Yes.

21 Q And to the best of your knowledge, this contract is still  
22 in force at the NRA, is that correct?

23 A Yes.

24 Q Okay. So when Mr. Spray joined -- or stepping back, so  
25 after the July 30, 2018 Audit Committee meeting, and when Mr.

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1                   You all have a nice weekend.

2                               \* \* \* \* \*

3                               C E R T I F I C A T I O N

4                   We, DANA J. KELLY, TRACY GRIBBEN, and KAREN K.

5 WATSON, court approved transcribers, certify that the foregoing  
6 is a correct transcript from the official electronic sound  
7 recording of the proceedings in the above-entitled matter, and  
8 to the best of my ability.

9  
10 /s/ Dana J. Kelly

11 DANA J. KELLY

12  
13 /s/ Tracy Gribben

14 TRACY GRIBBEN

15  
16 /s/ Karen K. Watson

17 KAREN K. WATSON

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DATE: April 21, 2021