

EXHIBIT G

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In Re: Investigation of National Rifle

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Association

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Videotaped Deposition of Wayne LaPierre

13

Washington, D.C.

14

June 17, 2020

15

9:00 a.m.

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Reported by: Bonnie L. Russo

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Videotaped Deposition of Wayne LaPierre held
at:

Office of the Attorney General
for the District of Columbia
441 4th Street, N.W.
Washington, D.C.

Pursuant to Notice, when were present on behalf
of the respective parties:

1 APPEARANCES:

2
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the Witness:

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19 Also Present Via Zoom:

Kathleen Konopka

20 Jimmy Rock

Emily Stern

21 Leo Miranda

22 Also Present:

Jeffrey Elam, Videographer

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C O N T E N T S

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EXHIBITS

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Exhibit 2	Independent Consulting Agreement	149
	NRA-NYAG-0016151-156	
Exhibit 3	Contract Extension Agreement	169
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Exhibit 4	Invoice dated 6-28-16	249
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Exhibit 5	Invoice dated 7-22-16	249
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Exhibit 6	Invoice dated 10-13-17	278
	NRA-NYAG-00085484-485	
Exhibit 7	Invoice dated 1-1-16	291
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EXHIBITS (CONTINUED) :

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(Exhibits bound separately.)

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P R O C E E D I N G S

THE VIDEOGRAPHER: Good morning.

We are going on the record at 9:22
a.m. on June 17th, 2020.

Please note that the microphones are
sensitive and may pick up whispering, private
conversations, and cellular interference.
Please turn off all cell phones or place them
away from the microphones as they can interfere
with the deposition audio.

Audio and video-recording will
continue to take place unless all parties agree
to go off the record.

This is Media Unit 1 of the
video-recorded deposition of Wayne LaPierre,
taken by the Attorney General -- General Office
in the matter of In Re: Investigation of
National Rifle Association vs. Assignment
Number 4136029.

This deposition is being held at the
D.C. Office of the General Counsel located at

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1 4414th Street, N.W., Suite 1107, Washington,
2 D.C., 1 -- excuse me -- 20001.

3 My name is Jeffrey Elam from the
4 firm, Veritext Legal Solutions, and I am the
5 videographer. The court reporter is Bonnie
6 Russo from the firm, Veritext Legal Solutions.

7 I am not authorized to administer an
8 oath. I am not related to any party in this
9 action, nor am I financially interested in the
10 outcome.

11 Counsel and all present in the room
12 and everyone attending remotely will now state
13 their appearances and affiliation for the
14 record. If there is any objection to
15 proceeding, please state them at the time of
16 your occurrence beginning with the noticing
17 attorney.

18 MR. SHEEHAN: Good morning.

19 My name is Jim Sheehan. I am an
20 assistant attorney general and chief of the
21 Charities Bureau of the New York State Attorney
22 General's Office, appearing on behalf of the

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1 Attorney General's Office.

2 MS. ROGERS: Good morning.

3 My name is Sarah Rogers. I'm with
4 the law firm of Brewer Attorneys & Counselors.
5 I'm counsel to the National Rifle Association
6 of America. And for purposes of today's
7 examination, I am counsel to Mr. LaPierre.

8 MS. BAKER: Good morning.

9 I'm Avery Baker. I'm with Brewer
10 Attorneys & Counselors. And Avis Harris
11 assisting me.

12 MS. JACKSON: Good morning.

13 I'm Catherine Jackson from the D.C.
14 Office of the Attorney General, here on behalf
15 of the D.C. Attorney General.

16 MS. JONES: I'm Jennifer Jones. I
17 am the senior trial counsel on behalf of the
18 D.C. Attorney General.

19 MR. CONLEY: I'm Jonathan Conley. I
20 am with the New York City Attorney General's
21 Office on behalf of the attorney general.

22 THE VIDEOGRAPHER: Will the court --

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1 THE WITNESS: And I'm Wayne
2 LaPierre, Executive Vice President of the
3 National Rifle Association.

4 THE VIDEOGRAPHER: Will the court
5 reporter, please, swear in the witness.

6
7 WAYNE ROBERT LAPIERRE,
8 being first duly sworn, to tell the truth, the
9 whole truth and nothing but the truth,
10 testified as follows:

11 MR. SHEEHAN: Before we start --

12 THE VIDEOGRAPHER: Thank you.

13 MR. SHEEHAN: I'm sorry.

14 THE VIDEOGRAPHER: You may proceed.

15 MR. SHEEHAN: Okay. Before we
16 start, sir, I just wanted -- I saw your 7:02
17 e-mail message and -- about certain documents
18 that you had discovered in the course, I guess,
19 of preparing for this examination.

20 Could you talk to us a little bit
21 about where those documents are, what they are,
22 and what your plans are for producing them?

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1 payments under this contract were budgeted by
2 the NRA?

3 A. I do not.

4 Q. All right. Do you know whether Mr.
5 Phillips provided consulting services to the
6 NRA pursuant to this contract?

7 A. I -- I know that Woody -- I was not
8 aware of this, but I know that Woody stayed in
9 touch with -- well, what is the date of this
10 contract? December 31st, 2018.

11 Q. As of December 31, but was signed
12 much earlier.

13 A. I do not know after December 31st,
14 2018, whether he did or whether he didn't.

15 Q. Do you think that the NRA got its
16 money worth -- money's worth, the \$30,000 per
17 month, for consulting services by Woody; that
18 is, Mr. Phillips?

19 A. I don't know because I wouldn't have
20 been the one dealing with him. It would have
21 been the treasurer's office and I didn't even
22 know about this.

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1 CERTIFICATE OF NOTARY PUBLIC

2 I, Bonnie L. Russo, the officer before
3 whom the foregoing deposition was taken, do
4 hereby certify that the witness whose testimony
5 appears in the foregoing deposition was duly
6 sworn by me; that the testimony of said witness
7 was taken by me in shorthand and thereafter
8 reduced to computerized transcription under my
9 direction; that said deposition is a true
10 record of the testimony given by said witness;
11 that I am neither counsel for, related to, nor
12 employed by any of the parties to the action in
13 which this deposition was taken; and further,
14 that I am not a relative or employee of any
15 attorney or counsel employed by the parties
16 hereto, nor financially or otherwise interested
17 in the outcome of the action.

18
19 

20 Notary Public in and for
21 the District of Columbia

22 My Commission expires: August 30, 2024