

## **EXHIBIT S**

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      In re:   Investigation of       :

3       National Rifle Association,   :

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**TESTIMONIAL HEARING OF SONYA ROWLING**

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12       DATE:           January 30, 2020

13       TIME:           10:00 a.m.

14       LOCATION:       Virginia Office of the Attorney General

15                       10555 Main Street, Suite 350

16                       Fairfax, Virginia

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19

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21       Reported By:   Toni Camera, CSR, Notary

22       Job No.:       3961629

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## A P P E A R A N C E S

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## 2 EXAMINATION BY: PAGE

3 Counsel for the State of New York 6

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## 6 ROWLING DEPOSITION EXHIBITS:\*

7 Exhibit 1 NRA Org Chart 19

8 Exhibit 2 Emails Bates NRA-NYAG00019522-24 73

9 Exhibit 3 Email Bates NRA-NYAG00015458 with 99

10 Attachment EVP Consulting 2015

11 Exhibit 4 Email Bates NRA-NYAG00014096 with 115

12 Attachment EVP Consulting Budget 2018

13 Exhibit 5 Email Bates NRA-NYAG00019619-20 120

14 Exhibit 6 NRA Policy Statement Bates 161

15 No. NRA-NYAG00011099-104

16 Exhibit 7 NRA Policy Manual 168

17 Exhibit 8 Email Bates NRA-NYAG00050569-70 172

18 Exhibit 9 Email Bates NRA-NYAG00050593-94 174

19 Exhibit 10 NRA Bylaws 176

20 Exhibit 11 Emails Bates NRA-NYAG00048282-83 232

21 Exhibit 12 NRA Representation Letter 3/13/2019 233

22 Bates RSM-NYAG0037910-14

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3	Exhibit 14 Emails Bates NRA-NYAG00021449-504 with	242
4	Contract and Spreadsheet Attachment	
5	Exhibit 15 Emails Bates NRA-NYAG00014135-39	270
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7	Exhibit 17 Emails Bates NRA-NYAG00014120	281
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16	Exhibit 25 NRA Employee Handbook	358
17	Bates NRA-NYAG00010649-64	
18	Exhibit 26 Email Bates NRA-NYAG00022046	371
19	Exhibit 27 9/8/2018 NRA Minutes of Board of	376
20	Directors Excerpts	
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22	(* Exhibits attached to transcript)	

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1 P R O C E E D I N G S

2 MS. ROGERS: Before we begin, the NRA  
3 would like to designate the contents of this  
4 interview confidential pursuant to the previously  
5 agreed language set forth in the parties' email  
6 correspondence.

7 MS. SASH: Can you be a little bit more  
8 specific about which email correspondence?

9 MS. ROGERS: I can't recall the exact  
10 date of the email, but there's an email from  
11 Yael Fuchs to me and to David Rody since, I  
12 believe, last May, and then recent correspondence  
13 with Emily Stern and Monica Connell reaffirming  
14 that that language covers documents produced by the  
15 NRA, and likewise, we would like it to cover  
16 testimony offered by Ms. Rowling.

17 Now, obviously you may elicit answers  
18 from her that coincide with publicly available  
19 information, such as the dates of her employment  
20 with the NRA. So we would be willing to, you know,  
21 reasonably tailor the designation with respect to  
22 information like that, but we just want to record

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1 an expectation of confidentiality in connection  
2 with the interview.

3 MR. SHEEHAN: Let's do this. I -- again,  
4 I remember seeing these discussions some time ago.  
5 So when we take a break, let's come back to you and  
6 see what we can tell you about that issue.

7 MS. ROGERS: Okay.

8 MS. SASH: Is that okay to go?

9 MS. ROGERS: Yes.

10 WHEREUPON,

11 SONYA ROWLING

12 called as a witness, and having been first duly  
13 sworn, was examined and testified as follows:

14 EXAMINATION BY COUNSEL FOR THE STATE OF NEW YORK  
15 BY MS. SASH:

16 Q Good morning, Ms. Rowling. My name is  
17 Sharon Sash. I'm an assistant attorney general  
18 from the Attorney General's Office of the State of  
19 New York. I am conducting this testimonial hearing  
20 as part of an investigation under New York's  
21 Executive Law. Its Estates, Powers, and Trust Law.  
22 It's not for profit corporation law. You are here

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1           A     Yes.

2           Q     But he requested the Word version, and  
3     you sent it to him?

4           A     Yes.

5           Q     So the document with Bates stamp 17220,  
6     the List of Top Concerns for the Audit Committee,  
7     let's just try to walk through them as quickly as  
8     we can.

9                     The first one is "Financial conflict of  
10    interest at the senior management and Board of  
11    Directors level. Your first one is Woody Phillips  
12    payments made to significant other." What is that  
13    one about?

14          A     I found out in early '18 that one of our  
15    contracts with -- I think it was HomeTelos -- that  
16    organization or that company was owned by Woody's  
17    significant other.

18          Q     A girlfriend or something like that?

19          A     Yes.

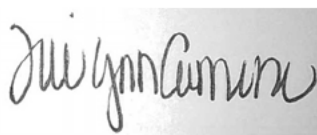
20                   MR. SHEEHAN: Who was that?

21                   THE WITNESS: Nancy -- I don't recall her  
22    last name.

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## 1 CERTIFICATE OF NOTARY PUBLIC

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

16 

17 TONI LYNN CAMERA

18 Notary Public in and for the  
19 Commonwealth of Virginia

20  
21 My commission expires:

22 July 31, 2021

Notary Registration No. 7294759