

EXHIBIT U

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In Re: Investigation of National Rifle
Association

VIDEOTAPED EXAMINATION OF CRAIG B. SPRAY

Washington, D.C.

June 12, 2020

9:14 a.m. to 5:35 p.m.

Reported by: Felicia A. Newland, CSR

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Videotaped Examination of Crag B. Spray 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:

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1 A P P E A R A N C E S

2 On behalf of the State of New York, Office of
3 the Attorney General:

4 JAMES G. SHEEHAN, ESQUIRE

STEPHEN THOMPSON, ESQUIRE

5 28 Liberty Street

New York, New York 10005

6 212-416-8490

James.Sheehan@ag.ny.gov

7 Stephen.Thompson@ag.ny.gov

8 On behalf of the National Rifle Association and
9 the Witness:

10 SARAH ROGERS, ESQUIRE

AVERY BAKER, ESQUIRE

11 BREWER ATTORNEYS & COUNSELORS

750 Lexington Avenue, 14th Floor

12 New York, New York 10022

212-527-2587

13 sbr@brewerattorneys.com

14 Also Present Via Zoom:

15 Emily Stern

Leo Miranda

16 Jennifer Jones

Alex Kavik

17

Also Present:

18

Dan Reidy, Videographer

19

20

21

22

Veritext Legal Solutions

212-267-6868

516-608-2400

NYAG-00016410

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1 C O N T E N T S

2 EXAMINATION BY: PAGE

3 Counsel for The New York Office of 10

4 Attorney General

5 CRAIG B. SPRAY EXHIBITS

6 NO. DESCRIPTION PAGE

7 EX-1 Subpoena, Notice of Deposition 11

8 EX-2 Confidential Candidate Report on Craig 39

9 B. Spray

10 EX-3 Composite exhibit, Letter to Mr. Craig 78

11 B. Spray from NRA, dated March 6, 2018

12 EX-4 Group Check ID G201911190000026 148

13 EX-5 Addendum to Agreement Between National 234

14 Rifle Association of America and McKenna

15 & Associates, LLC

16 EX-6 Corporate America Aviation, Inc. 310

17 Invoice, dated June 5, 2018

18 EX-7 Corporate America Aviation, Inc. 310

19 Invoice, dated February 7, 2019

20 EX-8 May 16, 2019 message from Josh Powell 329

21 EX-9 Composite exhibit of text messages 360

22 EX-10 Bates Nos. NRA-NYAG-000021414 through 376

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1	21415	
2	EX-11 Email string, dated 2018-07-13	380
3	EX-12 Bates Nos. NRA-NYAG-00086248 through	385
4	86267	
5	EX-13 September 8, 2018 National Rifle	413
6	Association Meeting Minutes (Excerpt)	
7	EX-14 Bates Nos. NRA-NYAG-00061321 through	449
8	61323	
9	*(Exhibits attached to transcript.)	

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

2 * * * * *

3 VIDEOGRAPHER: Good morning. We are
4 going on the record at 9:14 a.m. on June 12th,
5 2020. Please note that the microphones are
6 sensitive and may pick up whispering, private
7 conversations, and cellular interference.

8 Please turn off all cell phones or
9 place them away from the microphones as they can
10 interfere with the deposition audio.

11 Audio and video recording will
12 continue to take place unless both parties agree
13 to go off the record.

14 This is Media Unit 1 of the
15 video-recorded examination of Craig Spray, taken
16 by counsel for the Attorney General in the matter
17 or in regards to the Investigation of the
18 National Rifle Association.

19 This investigation is being held at
20 the Offices of the D.C. Office of General
21 Counsel, 441 4th Street Northwest, 20001.

22 My name is Dan Reidy from the firm

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1 Veritext Legal Solutions. And I'm the
2 videographer. The court reporter is Felicia
3 Newland from the firm Veritext Legal Solutions.

4 I'm not authorized to administer an
5 oath, I'm not related to any party in this
6 action, nor am I financially interested in the
7 outcome.

8 Counsel and all present in the
9 room, and everyone attending remotely will now
10 state their appearance and affiliation for the
11 record.

12 If there are any objections to
13 proceeding, please state them at the time of your
14 appearance, beginning with the noticing attorney.

15 MR. SHEEHAN: Good morning. My name
16 is Jim Sheehan. I'm an assistant attorney general
17 and chief of the Charities Bureau of the New York
18 Attorney General's Office.

19 MR. THOMPSON: My name is Stephen
20 Thompson. I'm also from the New York Attorney
21 General's Office. I'm an assistant attorney
22 general.

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NYAG-00016414

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1 MS. ROGERS: My name is Sarah Rogers.
2 I'm from the law firm of Brewer Attorneys and
3 Counselors. I serve as counsel to the National
4 Rifle Association. And I'm also here today as
5 counsel to the witness, Craig Spray.

6 MS. BAKER: My name is Avery Baker.
7 And I also work with the Brewer Attorneys and
8 Counselors. I serve as counsel to the National
9 Rifle Association. And I am also here today as
10 counsel to the Witness, Craig Spray.

11 VIDEOGRAPHER: I need the folks on
12 the Zoom.

13 THE WITNESS: Do you want me to
14 introduce myself?

15 MR. SHEEHAN: Wait. Let's -- let's
16 go with the folks on the Zoom first.

17 Emily.

18 MS. STERN: Good morning. This is
19 Emily Stern. I am also with the New York State
20 Attorney General's Office, the co-chief of the
21 Enforcement Section.

22 Good morning, Mr. Spray.

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1 THE WITNESS: Good morning.

2 MS. JONES: And good morning,

3 Mr. Spray.

4 This is Jennifer Jones. I'm a
5 senior trial counsel with the D.C. Attorney
6 General's Office.

7 MS. MIRANDA: Good morning. This is
8 Leo Miranda. And I'm an assistant attorney general
9 with the D.C. Office of the Attorney General.

10 THE WITNESS: Okay. Good morning.

11 MS. KAVIK: Good morning, Mr. Spray.
12 My name is Alex Kavik. I'm an assistant attorney
13 general with the D.C. Attorney General.

14 THE WITNESS: Good morning.

15 VIDEOGRAPHER: Will the court
16 reporter please swear in the witness?

17 * * * * *

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P R O C E E D I N G S

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* * * * *

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Whereupon,

5

CRAIG B. SPRAY

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called as a witness, and having been first duly

7

sworn, was examined, and testified as follows:

8

EXAMINATION BY COUNSEL FOR THE NEW YORK OFFICE OF

9

THE ATTORNEY GENERAL

10

BY MR. SHEEHAN:

11

Q Okay. Good morning, Mr. Spray. As

12

you just heard, I'm Jim Sheehan. I'm an assistant

13

attorney general for the State of New York. I will

14

be conducting the testimony hearing today as part

15

of an investigation under our New York's Executive

16

Law, Not-for-profit Corporation Law, and Estates,

17

Powers and Trusts Law.

18

And you are here as a witness

19

pursuant to subpoena for your testimony.

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MR. SHEEHAN: And at this time I

21

would like to mark as Exhibit 1 the subpoena, the

22

notice of deposition.

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1 for the most part, I think this was a -- a list
2 that was generated and provided to counsel.

3 Q Well, for the audit committee as
4 well?

5 A It was also -- yeah, it was
6 definitely provided to the audit committee. I'm
7 not sure if -- I'm not sure whether audit committee
8 council or audit committee but --

9 Q So let's -- let's walk through.
10 Did you know about the payments to
11 the significant other of Woody Phillips?

12 A I knew about some of these, not all
13 of them. I don't think I knew about Woody's
14 payments to a significant over at that point. Now,
15 later on, obviously I -- I did, but at this point
16 in time I don't think I did.

17 Q Okay. Take a look at Tab 14.

18 A So I guess I did.

19 Q Well, this is reciting -- this is
20 Sonya reciting a conversation where -- Emily
21 recited a conversation she had with you, so --

22 A Yeah.

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1 Q Did you raise the non-Woody issues
2 with him?

3 A I asked him about some of this stuff,
4 yes.

5 Q And what did he say?

6 A He always had pretty good -- pretty
7 good, you know, things to say that kind of made me
8 feel like, you know, well, maybe -- I just didn't
9 know what the truth was. I just -- I still don't
10 know on a lot of this stuff what the truth is so...

11 Q Okay. So let's start with the Woody
12 Phillips' one. Do you know whether there was a
13 payment made to a significant other?

14 A Well, there --

15 Q That was true, wasn't it?

16 A I believe it was true, but I think
17 that it went through the audit committee and it was
18 found to be appropriate in terms of the dollars
19 spent and the services provided and that sort of
20 thing.

21 So, again, there's -- you know, just
22 because it happened. And -- and, you know, would I

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1 CERTIFICATE OF NOTARY PUBLIC

2 I, FELICIA A. NEWLAND, CSR, the officer before
3 whom the foregoing examination was taken, do hereby
4 certify that the witness whose testimony appears in
5 the foregoing examination 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 examination 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 examination was taken; and, further, that I am not a
13 relative or employee of any counsel or attorney
14 employed by the parties hereto, nor financially or
15 otherwise interested in the outcome of this action.

16
17 

18 FELICIA A. NEWLAND, CSR

Notary Public

19 My commission expires:

20 September 15, 2024
21
22