

EXHIBIT “10”

Page 1

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
PEOPLE OF THE STATE OF NEW YORK, BY LETITIA
JAMES, ATTORNEY GENERAL OF THE STATE OF NEW
YORK,

PLAINTIFF,

-against-

Case No.:
451625/2020

THE NATIONAL RIFLE ASSOCIATION OF AMERICA,
INC., WAYNE LAPIERRE, WILSON PHILLIPS, JOHN
FRAZER, and JOSHUA POWELL,

DEFENDANT.

DATE: June 9, 2022

TIME: 10:17 A.M.

-----X
CONFIDENTIAL VIDEOTAPED DEPOSITION of
the Defendant, JOSHUA POWELL, taken by the
Plaintiff, pursuant to a Court Order and to
the Federal Rules of Civil Procedure, held
at the offices of New York State Office of
the Attorney General, 28 Liberty Street,
New York, New York 10005, before Karyn
Chiusano, a Notary Public of the State of
New York.

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A P P E A R A N C E S:

NEW YORK STATE OFFICE OF THE
ATTORNEY GENERAL

Attorneys for the Plaintiff
PEOPLE OF THE STATE OF NEW YORK, BY
LETITIA JAMES, ATTORNEY GENERAL OF THE
STATE OF NEW YORK
28 Liberty Street ~ 16th Floor
New York, New York 10005
BY: JONATHAN CONLEY, ESQ.
MONICA CONNELL, ESQ.
jonathan.conley@ag.ny.gov

BREWER, ATTORNEYS & COUNSELORS
Attorneys for the Defendant
THE NATIONAL RIFLE ASSOCIATION OF
AMERICA, INC.
750 Lexington Avenue
New York, New York 10022
BY: SARAH ROGERS, ESQ.
sbr@brewerattorneys.com

CORRELL LAW GROUP
Attorneys for the Defendant
WAYNE LaPIERRE
250 Park Avenue ~ 7th Floor
New York, New York 10177
BY: KENT CORRELL, ESQ.
kent@correlllawgroup.com

WERBNER LAW
Attorneys for the Defendant
WILSON PHILLIPS
5600 W Lovers Lane ~ Suite 116-314
Dallas, Texas 75209
BY: PATRICK BANNON
MARK WERBNER, ESQ.
mwerbner@werbnerlaw.com

(Appearances continue on following page.)

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A P P E A R A N C E S: (Continued)

GAGE, SPENCER & FLEMING, LLP
Attorneys for the Defendant
JOHN FRAZER
410 Park Avenue ~ #810
New York, New York 10022
BY: WILLIAM FLEMING, ESQ.
ELLEN JOHNSON, ESQ.
wfleming@gagespencer.com

AKIN, GUMP, STRAUSS, HAUER & FELD, LLP
Attorneys for the Defendant
JOSH POWELL
Bank of America Tower
1 Bryant Park
New York, New York 10036
BY: THOMAS P. McLISH, ESQ.
MARK MacDOUGALL, ESQ.
SAMANTHA BLOCK, ESQ.
HAILEY BOOKER, ESQ.
tmclish@akingump.com

ALSO PRESENT:

JIM FARMER, Concierge
JONATHAN DiFILIPO, Videographer
CARLOS S. RICO, Intern, New York State
Office of the Attorney General
DAVID VU
ELLEN JOHNSON

*

*

*

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1 CONFIDENTIAL ~ JOSHUA POWELL
2 photography services for the NRA directly,
3 as well; correct?

4 A. It's my belief that he did do
5 some work for them.

6 Q. When did your father first do
7 work for the NRA?

8 A. I am not sure.

9 Q. Do you recall if it was before
10 you worked for the NRA?

11 A. Um, no. It was not.

12 Q. So, your father performed --
13 MR. CONLEY: I'm sorry.
14 Strike that.

15 Q. Your father provided
16 photography services for the NRA at some
17 point while you were an NRA employee?

18 A. Correct.

19 Q. And did you inform the Audit
20 Committee prior to your father performing
21 photography services for the NRA?

22 A. No.
23 Because I wasn't aware that he
24 was.

25 Q. And your father also provided

1 CONFIDENTIAL ~ JOSHUA POWELL

2 photography services for Ackerman McQueen;

3 correct?

4 A. Correct.

5 Q. And the photography services he

6 provided for Ackerman McQueen were for NRA

7 projects?

8 A. Correct.

9 Q. And Ackerman McQueen billed the

10 NRA for the cost of those photography

11 services?

12 A. I can't attest to what they

13 billed to, but I would assume they would.

14 Q. And the NRA paid Ackerman

15 McQueen for photography services that your

16 father provided; correct?

17 A. I don't know what they paid

18 for.

19 Q. During what time period did

20 your father provide photography services to

21 Ackerman McQueen?

22 A. As I stated, during the

23 inauguration.

24 Q. And with what inauguration was

25 that?

1 CONFIDENTIAL ~ JOSHUA POWELL

2 A. The Presidential Inauguration.

3 Q. And what year was that?

4 A. The year that I worked at the
5 NRA, 2016.

6 Q. When did you first learn that
7 your father was providing photography
8 services to the NRA?

9 A. Bill Brewer brought it to my
10 attention.

11 Q. And was this in 2018?

12 A. Um, I think so. I am not sure.

13 Q. And when did you first learn
14 that your father was providing photography
15 services to Ackerman McQueen.

16 MS. ROGERS: I instruct the
17 witness not to testify about
18 communications with counsel.

19 You can testify otherwise.

20 A. I don't know.

21 MR. CONLEY: Jim, can we please
22 mark Tabs 19 and 20 Exhibits 11 and
23 12.

24 (Whereupon, e-mail chain from
25 Nader Tavangar, was marked as

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D E C L A R A T I O N

I hereby certify that having been
first duly sworn to testify to the truth, I
gave the above testimony.

I FURTHER CERTIFY that the foregoing
transcript is a true and correct transcript
of the testimony given by me at the time
and place specified hereinbefore.

JOSHUA POWELL

Subscribed and sworn to before me
this _____ day of _____ 20____.

NOTARY PUBLIC

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E X H I B I T S

PLAINTIFF'S EXHIBITS

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2 PLAINTIFF'S EXHIBITS

3

4 EXHIBIT EXHIBIT PAGE

5 NUMBER DESCRIPTION

6 Exhibit 12 E-mail from Cole McCulloch 290

7

8

9 (Exhibits retained by Court Reporter.)

10

11 I N D E X

12

13 EXAMINATION BY PAGE

14 MR. CONLEY 11

15

16

17 INFORMATION AND/OR DOCUMENTS REQUESTED

18 INFORMATION AND/OR DOCUMENTS PAGE

19 (None)

20

21

22 QUESTIONS MARKED FOR RULINGS

23 PAGE LINE QUESTION

24 (None)

25

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C E R T I F I C A T E

STATE OF NEW YORK)

: SS.:

COUNTY OF NEW YORK)

I, KARYN CHIOUSANO, a Notary Public
for and within the State of New York, do
hereby certify:

That the witness whose examination is
hereinbefore set forth was duly sworn and
that such examination is a true record of
the testimony given by that witness.

I further certify that I am not
related to any of the parties to this
action by blood or by marriage and that I
am in no way interested in the outcome of
this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 13th day of June, 2022.



KARYN CHIOUSANO