

# EXHIBIT “7”

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

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

Plaintiff,

vs.

Case No. 451625/2020

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

Defendants.

H I G H L Y C O N F I D E N T I A L

The Videotape Deposition of CRAIG B. SPRAY

Taken Via Remote Zoom Videoconference

Commencing at 9:10 a.m.

Friday, January 14, 2022

Stenographically reported by:

Joanne Marie Bugg, CSR-2592, RPR, RMR, CRR

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1 million to 33 million, 33.5 million. Do you see that?

2 MS. EISENBERG: Objection.

3 A. I see it. But, again, I, I don't think that that's  
4 correct.

5 BY MS. FUCHS:

6 Q. Do you recall such a drastic reduction?

7 A. No, I don't.

8 MS. EISENBERG: Objection.

9 BY MS. FUCHS:

10 Q. Okay. You can put that aside.

11 Switching gears, you were hired through the  
12 NRA by the NRA for an executive search process run by  
13 the consulting firm McKenna & Associates, correct?

14 A. That's correct.

15 Q. And one of the McKenna employees who interviewed you  
16 was woman named Colleen Gallagher; is that correct?

17 A. That's correct.

18 Q. And Ms. Gallagher is Josh Powell's wife; is that  
19 correct?

20 A. I, I learned that later, yes.

21 Q. You weren't aware of that relationship until you  
22 started working at the NRA; is that right?

23 A. Correct. I did not know during the interview process.

24 Q. Some time after you started working at the NRA, you  
25 confronted Mr. Powell about whether he had disclosed

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1 his relationship with Ms. Gallagher; is that correct?

2 A. That somewhat mischaracterizes. It was Josh actually  
3 approached me and asked me not to say anything about  
4 his wife working at McKenna. And that's when I told  
5 him he needed to disclose that.

6 Q. Okay. And then he did, correct?

7 MS. EISENBERG: Again, you're --

8 A. I'm sorry. You're cutting out, ma'am. I can't -- I  
9 can't hear you.

10 BY MS. FUCHS:

11 Q. And then he disclosed it to John Frazer; is that  
12 correct?

13 A. Yes, yes.

14 DEPOSITION EXHIBIT 35

15 Email String NRA-NYAGCOMMDIV-00503763

16 1:48 p.m.

17 BY MS. FUCHS:

18 Q. Okay. I'd like to mark as Exhibit 38, five, I'm sorry,  
19 tab 77 bearing Bates number 00503763. This is from  
20 early in your tenure. I direct your attention to the  
21 email at the bottom dated September 1st, 2018 in which  
22 you write, "Linda, Josh has all of his living expenses  
23 direct billed to the NRA. He has asked that we roll  
24 this into his base pay. I met with Wayne on this as I  
25 wasn't comfortable simply doing this. Wayne said he

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1 BY MS. FUCHS:

2 Q. And after the member meeting, is that when you began  
3 looking into Mr. Powell's expenses?

4 A. No. The catalyst for that was I had a staff member come  
5 to me and ask me to approve a hard check request to a  
6 landlord on Josh's behalf. And I said why would I pay a  
7 deposit for Josh's apartment? That doesn't make any  
8 sense. We've paid to move him here. If he wants to  
9 relocate in the D.C. area, that should be on his dime,  
10 not on the NRA's dime.

11 And that's when I started digging into it to  
12 understand really what we were paying, and why, as none  
13 of those costs had come through me. They were -- they  
14 were going through a separate process at that point.  
15 They were -- big scope of things, they were relatively  
16 small. They wouldn't necessarily need my signoff.

17 But I was thinking to myself, you know, I  
18 had stopped my temporary living unilaterally. And, you  
19 know, here's this guy three or four years after we  
20 moved him making 300 percent more than what he had made  
21 originally. And we were still sort of doing all these  
22 work arounds.

23 And there's a lot of reasons I don't like  
24 these. One is I worry about taxation. Two, I worry  
25 about workload for the staff. It's just -- it's just

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1 not a good process. So that's why I started digging  
2 into it. It really had nothing to do with the other  
3 items. It's just once I started looking at it, I just  
4 thought I had to get my arms around it, and get it  
5 resolved, and figure it out.

6 And that's when I started trying to  
7 understand why weren't these rolled into his base, and  
8 discussions with Woody. And that's when I was told  
9 that, you know, put a package together, and really --  
10 and make the recommendation. And, and so that's what I  
11 was doing.

12 And I think this is when we got cut off last  
13 time. I had one meeting with Wayne where he said go  
14 ahead and do that. I was working on that. And I had to  
15 enlist the support of a couple of staff members to do  
16 that. One was Lisa Supernaugh, and I was asking about  
17 all the costs.

18 I didn't have all the costs that we were  
19 pushing through. He was -- you know, there were things  
20 like utilities, and cable, and cell phones, and all  
21 those types of -- those types of things that I  
22 typically don't see, or don't see past six to 12 months  
23 or whatever.

24 And as I was kind of shaking my head, Lisa  
25 mentioned sort of in an ad hoc way, well, you should

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1 where he indicated he wanted to go in a different  
2 direction, you stopped looking into the question of  
3 what the original intent of Mr. Josh's -- or Mr.  
4 Powell's compensation agreement was; is that right?

5 A. That's correct.

6 Q. Okay. Now, at some point, you, you began looking into  
7 Mr. Powell's expenses; is that right?

8 A. That's correct.

9 Q. You testified that Ms. Supernaugh said something to you  
10 about you should look at Josh's credit card?

11 A. Correct.

12 Q. And that was an Amex card?

13 A. Correct.

14 Q. Was that an NRA issued Amex card?

15 A. Yes.

16 Q. And you got access to the account; is that right?

17 A. It's a convoluted process. But effectively all of the  
18 executive's Amexes were underneath the personal credit  
19 worthiness of myself and Rick Tedrick. And so when I  
20 had split up who had who underneath their ownership, I  
21 had moved people around. I had eliminated people. And I  
22 tried to make sure that anybody that was senior to  
23 Rick, Rick wasn't reviewing their, their financials or  
24 their expenses.

25 And so Josh was under me, but this was quite



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1 a while after I was with the organization, because Josh  
2 was originally under Woody. And so it wasn't until  
3 after Woody left, and we made this transition, that I  
4 had access to Josh's new credit card expenses.

5 And it wasn't until I received the tip from  
6 Lisa that I started to try to figure out how to look at  
7 older stuff prior to my arrival. And there was actually  
8 one issue during my tenure, which we picked up, but the  
9 vast majority of the -- of the issues were when Woody  
10 was reviewing the card. And so it took me some time to  
11 figure out how to access the NRA credit cards prior to  
12 me getting on the system.

13 Q. All right. My question was about -- I think my question  
14 was did you get access to Mr. Powell's Amex card, or  
15 the account?

16 A. I always had access to his credit card account. It went  
17 underneath my card.

18 Q. Okay.

19 A. Showed up. His statements showed up as part of my  
20 statements.

21 Q. And you reviewed those statements personally?

22 A. I did for the ones that came in during my tenure, yes.

23 Q. Okay. And but when you began looking at Mr. Powell's  
24 expenses, how did you get the statements that you  
25 reviewed?

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1 A. How did I get -- can you repeat the question? I don't  
2 understand the question.

3 Q. Well, at some point am I correct you reviewed all of  
4 Mr. Powell's past statements on the Amex card, or his  
5 usage of the card?

6 A. Correct.

7 Q. And how did you do that? Did you -- did you already  
8 have those statements, or did you get access to online?

9 A. It was -- it was through the Amex system. I had  
10 automated access, because he was under my name under my  
11 responsibility.

12 Q. So you used your own login information on an Amex  
13 website to get access to his statements?

14 A. Correct. It was just my login information, right.

15 Q. And you could tell by looking -- how could you tell  
16 what expenses were Mr. Powell's?

17 A. Everything -- for everybody that was under me, they  
18 each have their own section with their name on it, and  
19 their credit card number, and all their expenses, and  
20 all I do is click on it.

21 Q. Okay. And then you personally went through all of his  
22 Amex charges back to the beginning of his tenure at  
23 NRA?

24 A. No. I went back far enough where I felt like we had an  
25 issue, and then I decided we needed to hire a

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1 professional firm to go all the way back and do the  
2 analysis.

3 Q. Other than Mr. Powell, who else's statements did you  
4 have access to that were on that same Amex account?

5 A. I would have had Joe DeBergalis, I believe. Doug  
6 Hamlin, I believe. I had all the IT costs under  
7 another card. And I believe I had Tyler Schropp, but I  
8 could be wrong about that. But I believe we eventually  
9 put him under me.

10 Q. What about Mr. Phillips?

11 A. Well, at this point in time Mr. Phillips was not part  
12 of the organization, so he didn't have a card.

13 Q. So for any of those people, did you -- did you do a  
14 similar analysis that you did for Mr. Powell?

15 A. Well, I did that -- this was part of the findings.  
16 They recommended doing sampling. And what I told Rick  
17 was I don't want to be sampling on these. I want to be  
18 100 percent every month. So every month we would audit  
19 100 percent.

20 And that's when we found the one, the one  
21 issue with Josh during my tenure. And then with Lisa's  
22 input I decided to go back farther. So I did not go  
23 back farther for any other employee, although those  
24 employees didn't necessarily have cards. Like, for  
25 example, Tyler Schropp was relatively new to the credit

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## CERTIFICATE OF NOTARY

STATE OF MICHIGAN )

) SS

COUNTY OF WAYNE )

I, JOANNE MARIE BUGG, certify that this remote deposition was taken before me on the date hereinbefore set forth; that the foregoing questions and answers were reported by me stenographically and reduced to computer transcription; that this is a true, full and correct transcript of my stenographic notes so taken; and that I am not related to, nor of counsel to, either party nor interested in the event of this cause.



---

JOANNE MARIE BUGG, CSR-2592

Notary Public

Wayne County, Michigan

My Commission expires: 2-26-2025

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## ACKNOWLEDGMENT AND ERRATA OF DEPONENT

I, CRAIG B. SPRAY, do hereby certify that I have read the foregoing transcript of my testimony taken on 1/14/22, and further certify that it is a true and accurate record of my testimony (with the exception of the corrections listed below):

Page	Line	Correction
_____	_____	_____
_____	_____	_____
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\_\_\_\_\_  
CRAIG B. SPRAY

SUBSCRIBED AND SWORN TO BEFORE ME

THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
(NOTARY PUBLIC)

\_\_\_\_\_  
MY COMMISSION EXPIRES: