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NYSCEF DOC. NO. 1655

EXHIBIT "8"

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> UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS

IN RE: Case No. 21-30085-HDH-11

NATIONAL RIFLE

ASSOCIATION OF AMERICA Earle Cabell Federal Building

1100 Commerce Street and SEA GIRT LLC,

Dallas, TX 75242-1496

Debtors.

April 8, 2021

1:15 p.m.

P.M. Session

AMENDED TRANSCRIPT OF MOTION TO DISMISS CASE

BEFORE HONORABLE HARLIN DEWAYNE HALE UNITED STATES BANKRUPTCY COURT JUDGE

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Rowling - Direct/Thompson

for reviewing the AmEx expense reports, is that correct?

- A I don't know if they were responsible for reviewing each
- 3 one of the ones underneath them. I don't know.
- $4 \parallel Q$ Okay. Prior to Mr. Spray joining the NRA in March of
- $5 \parallel 2018$, the NRA's policy for requiring a business purpose for
- 6 expense reimbursements was inconsistently enforced, is that
- 7∥correct?
- 8 A There were, yes, there were occasions when the business
- 9 purpose was not supplied.
- $10 \parallel Q$ Okay. And so this resulted in instances where the NRA was
- 11 improperly reimbursing employees for personal?
- 12 A For personal?
- 13 Q Yes. Let me rephrase. So, this rustled in instances
- 14 where the NRA was improperly reimbursing employees for expenses
- 15 that did not have a proper NRA business purpose, is that
- 16 correct?
- 17 A That could have happened, yes.
- 18 Q Okay. Did it in fact happen?
- 19 A I'd have to look back and see, but I don't, I can't say if
- 20 there were, they actually ended up being improper or not. Each
- 21 one would have to be analyzed in and of itself.
- 22 Q So for example, let's take Joshua Powell as an example.
- 23 You did personally review the AmEx expenditures for Mr. Powell
- 24 at some point in late 2019, is that correct?
- 25 A I did.

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Rowling - Direct/Thompson

And as a result of your review, you determined that some

of Mr. Powell's expenditures were not for proper NRA business

purposes, is that correct?

A That is correct.

5 Q And that determination applied to some payments going as

6 far back as when Mr. Powell joined the NRA in 2016, is that

7 correct?

8 A Yes.

9 Q So it's fair to say that in some instances the NRA was

10 \parallel improperly reimbursing employees for expenses that did not have

11 \parallel an appropriate NRA purpose, is that correct?

12 A Yes.

13 Q And prior to Mr. Spray joining the NRA in March of 2018,

14 there were instances where employees' expenses were being

 $15\parallel$ billed to the NRA as pass through expenses by vendors, is that

16 correct?

17 A That is -- I personally did not see evidence of that. But

18 that is what -- all my conversations relating to those have

19 been with counsel.

20∥Q Have you had any conversations with any of your

21 colleagues, for example Ms. Padilla in the Accounts Payable

22 Division, about any expenses she has seen being passed to the

23 NRA as pass through by vendors?

24 A I don't recall.

25 Q So you have no personal knowledge of any NRA employee

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