

EXHIBIT 3

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1
2 SUPREME COURT OF THE STATE OF NEW YORK
3 COUNTY OF NEW YORK.

4 -----X
5 PEOPLE OF THE STATE OF NEW YORK, BY LETITIA
6 JAMES, ATTORNEY GENERAL OF THE STATE OF NEW
7 YORK,

PLAINTIFF,

-against-

8 Case No.:
9 451625/2020

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

DEFENDANT.

13 -----X
14 DATE: July 29, 2022

15 TIME: 10:48 A.M.

16 CONFIDENTIAL REALTIME VIDEOTAPED
17 DEPOSITION of the Defendant, THE NATIONAL
18 RIFLE ASSOCIATION OF AMERICA, INC., by a
19 Corporate Representative, JOHN FRAZER,
20 taken by the Plaintiff, pursuant to a Court
21 Order and to the Federal Rules of Civil
22 Procedure, held at the Offices of New York
23 State Office of the Attorney General, 28
24 Liberty Street, New York, New York 10005,
25 before Karyn Chiusano, a Notary Public of
the State of New York.

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1 CONFIDENTIAL ~ JOHN FRAZER
2 identified, although not by name, pursuant
3 to the IRS instructions.

4 Without looking at the form, I
5 can't recall if there was a reference
6 to anything else in that section of the
7 form.

8 Q. How does the NRA define
9 "diversion of assets" for the purposes of
10 answering this question?

11 A. We follow --

12 MS. EISENBERG: Objection.

13 A. We follow the instructions
14 provided by the IRS.

15 Q. In reporting fundraising
16 activities on the 990, who within the NRA
17 is responsible for that?

18 MS. EISENBERG: Objection,
19 timeframe.

20 MS. CONNELL: Between 2015 and
21 the present.

22 A. It would depend -- it would
23 depend on the year, the personnel have --
24 have changed, but speaking to the
25 preparation of the 990 generally, the

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2 principle responsibility always is within
3 the Treasurer's Office or the Financial
4 Services Division, part of the Treasurer's
5 Office.

6 But various years, it would be
7 Emily Cummins, Svetlana Ochevsky, Arif
8 Ramon and their Supervisors at the
9 Treasurer level.

10 MS. CONNELL: Clint, can you
11 pull up Tab 6 as Exhibit 10?

12 MR. THOMAS: Can you give me
13 the name of Tab 6? I don't see it,
14 it might not be labeled as "Tab 6."

15 MS. CONNELL: It's the 2019 990
16 or the CHAR 500 at the beginning.

17 MR. THOMAS: All right.

18 (Mr. Thomas complies.)

19 MS. CONNELL: We are marking
20 that as Exhibit 10.

21 (Whereupon, Form 990, was
22 marked as Frazer Exhibit 10 for
23 identification as of this date by the
24 Reporter.)

25 MS. EISENBERG: Thank you,