

EXHIBIT 4

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

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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 16, 2022

TIME: 10:03 A.M.

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CONFIDENTIAL VIDEOTAPED DEPOSITION of
30(b)(6) Forensic Risk Analysis, by a
Witness, MICHAEL ERSTLING, taken by the
Plaintiff, pursuant to a Subpoena and to
the Federal Rules of Civil Procedure, held
remotely, at all parties locations, before
Karyn Chiusano, a Notary Public of the
State of New York.

1 CONFIDENTIAL ~ MICHAEL ERSTLING

2 Q. And do you get tax advice from
3 Aronson, and before Aronson, RSM?

4 MS. SASH: Objection.

5 A. I can't answer that question.
6 I just don't know at this time.

7 Q. Okay. Well, I will ask you one
8 last question on that topic. Do the tax
9 accountants at Aronson, or before that at
10 RSM, in your experience, ever make
11 suggestions about what information goes
12 where in the 990?

13 MS. SASH: Objection.

14 A. Um, I believe -- it is my
15 belief that, yes, they do provide some
16 guidance as to location.

17 Q. And in your experience, and
18 tell me if you don't know, do you rely on
19 that advice?

20 MS. SASH: Objection.

21 A. I -- I was not involved in the
22 last completed document, so I -- I don't
23 have that knowledge.

24 Q. Okay. And prior to Arif, who
25 put together the 990?

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1 CONFIDENTIAL ~ MICHAEL ERSTLING

2 MS. SASH: Objection.

3 A. Svetlana Olshefski.

4 Q. Okay. And what role did Emily
5 Cummings play in putting together the 990
6 while she was at the NRA?

7 MS. SASH: Objection.

8 A. So Emily is -- was also putting
9 together I think before Svetlana was
10 putting the 990 together, Emily was putting
11 it together. She would get a base set of
12 schedules that were completed by the
13 staffing in Financial Services, and she
14 would take that and put together the 990.

15 Q. Okay. So the last two
16 questions for you.

17 Have you had occasion to work
18 with Mr. Frazer on compliance seminars?

19 MS. SASH: Objection.

20 A. Yes, sir.

21 Q. And do you have a sense that
22 the NRA is generally committed to
23 compliance?

24 MS. SASH: Objection.

25 A. Yes.