

EXHIBIT 7

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2

SUPREME COURT OF THE STATE OF NEW YORK

3

COUNTY OF NEW YORK

4

Index No. 451625

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6

PEOPLE OF THE STATE OF NEW YORK,

7

BY LETITIA JAMES, ATTORNEY GENERAL OF THE

8

STATE OF NEW YORK,

9

Plaintiff,

10

- against -

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THE NATIONAL RIFLE ASSOCIATION OF AMERICA,

13

INC., WAYNE LAPIERRE, WILSON PHILLIPS,

14

JOHN FRAZER, and JOSHUA POWELL,

15

Defendants.

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April 18, 2022

18

9:41 a.m.

19

20

Continued remote

21

video-teleconference deposition via Zoom

22

of GREG PLOTTS, taken by Plaintiff,

23

pursuant to notice, before Jineen Pavesi,

24

a Certified Realtime Reporter and Notary

25

Public of the State of New York.

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2 respect to the 990?

3 MS. FUCHS: Objection.

4 A. I did not have a lot of
5 interaction with John Frazier about the
6 990.

7 There is definitely some
8 disclosures that we'll talk to make sure
9 everyone is comfortable with those
10 disclosures, but I had limited discussions
11 with John about the 990.

12 Q. I believe you testified before
13 that you view it to be prudent for
14 organizations to get advice from tax
15 professionals with respect to the 990, is
16 that right?

17 A. Yes, I did.

18 Q. Is that because it's, as you
19 called it, a very complex document?

20 A. It is, it's becoming more and
21 more complex, is what I was saying; it is
22 becoming less financial and more
23 informational and a legal document and a
24 policies and procedures document.

25 Q. And do you have any

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2 understanding of whether the NRA employed
3 the services of tax professionals with
4 respect to the formation of the 990?

5 MS. FUCHS: Objection.

6 A. Well, they looked to Aronson to
7 help review the 990 and they also had, I
8 forget the tax attorney's name, to look
9 over the 990 along with Aronson.

10 Q. So there is a lot of sort of
11 professional advice that goes into it or
12 went into it?

13 MS. FUCHS: Objection.

14 A. To the best of my knowledge,
15 there was a lot of professional advice,
16 yes.

17 Q. Now, did Aronson view the NRA's
18 990 to be true, correct, and complete?

19 A. Well, we helped review and go
20 over certain questions about the 990 that
21 they had and reviewed the financial
22 information in it to be complete and
23 accurate as far as the audited financial
24 statements and how they were portrayed in
25 the 990.