

EXHIBIT A

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2 the excess benefits reported for

3 Mr. LaPierre in the 2019 990.

4 MR. FLEMING: I object to the
5 characterization.

6 MS. EISENBERG: Same.

7 MS. CONNELL: Clint, can we
8 pull up Tab 21 and make it Exhibit 9?

9 MR. THOMAS: You said "21,"
10 correct?

11 MS. CONNELL: Yes, please.

12 (Whereupon, Sloan report, was
13 marked as Frazer Exhibit 9 for
14 identification as of this date by the
15 Reporter.)

16 Q. Mr. Frazer, have you seen the
17 document that we have labeled as Exhibit 9
18 before?

19 A. Yes.

20 Q. Was this --

21 A. One moment.

22 Q. Sure.

23 A. Let me take a look to be
24 certain.

25 (Witness reviews document.)

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2 A. This appears to be to a
3 document that I've seen before.

4 Q. Is this a Sloan report used to
5 analyze excess benefits allegedly received
6 by Mr. Cox?

7 MS. EISENBERG: Objection.

8 A. I believe so.

9 Q. The NRA hired Mr. Sloan to look
10 at potential excess benefits received by
11 Mr. Cox?

12 A. As I described earlier, with
13 some other topics. Scratch that.

14 Mr. Sloan was retained as an
15 expert in the arbitration with Mr. Cox,
16 but as I -- as I stated earlier, a --
17 sometimes -- I think I stated earlier,
18 sometimes in -- information that is
19 developed in the course of one proceeding
20 or matter may be relevant to another thing,
21 in this case, the excess report.

22 Q. Mr. Sloan is a Forensic
23 Accounting; is that correct?

24 A. One moment.

25 (Witness reviews document.)

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2 A. Yes.

3 Q. Did the NRA use Mr. Sloan to
4 look at potential excess benefits received
5 by Joe DeBergalis?

6 (Witness reviews document.)

7 A. No.

8 Q. Did the NRA retain Mr. Sloan to
9 look at potential excess benefits received
10 by Doug Hamlin?

11 MS. EISENBERG: Objection.

12 A. No.

13 Q. Tyler Schlopp?

14 MS. EISENBERG: Objection.

15 A. No.

16 Q. Wayne LaPierre?

17 MS. EISENBERG: Objection.

18 A. No.

19 Q. Woody Phillips?

20 MS. EISENBERG: Objection.

21 A. No.

22 Q. Why not?

23 MS. EISENBERG: Objection.

24 A. Because as I indicated, he was
25 retained, although very well qualified, he

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2 was retained in connection with a specific
3 proceeding. And in other cases, it wasn't
4 felt to be necessary to retain to incur the
5 expense of retaining an additional expert.

6 Q. Did the NRA apply the same
7 methodology that Mr. Sloan used in looking
8 at excess benefits received by others --
9 potentially received by others within the
10 NRA?

11 MS. EISENBERG: Objection.

12 A. One moment.

13 (Witness reviews document.)

14 A. I don't think I can answer that
15 "yes" or "no." I'm sorry, I'm done.

16 Q. Did the NRA retain any Forensic
17 Accounting to look at excess benefits
18 potentially received by Tyler Schlopp, Joe
19 DeBergalis, Doug Hamlin, Wayne LaPierre and
20 Woody Phillips?

21 MS. EISENBERG: Objection.

22 A. Not that I'm aware of.

23 Q. Okay. How much did the NRA
24 seek to recoup from Mr. --

25 MS. CONNELL: Strike that.

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2 Q. How much in excess benefits did
3 the NRA alleged Mr. Cox received?

4 MS. EISENBERG: Objection.

5 A. I don't -- without looking at
6 the 990, I don't recall the specific
7 amount. To my recollection, it was in
8 excess of One Million.

9 Q. Ultimately, the NRA settled
10 with Mr. Cox?

11 A. Yes.

12 Q. How much did the entire Cox
13 arbitration cost the NRA?

14 MS. EISENBERG: Objection.

15 A. Sitting here right now, I don't
16 have a number.

17 Q. Did anyone within the NRA look
18 at that?

19 MS. EISENBERG: Outside the
20 scope. Objection.

21 THE WITNESS: Can I answer?

22 MS. EISENBERG: If you feel
23 prepared to answer, please go ahead,
24 Mr. Frazer. But if you don't, just
25 let us know.

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2 Thanks.

3 A. Sitting here right now, I don't
4 recall if there was a total calculation.

5 MS. CONNELL: I'm gonna skip to
6 Topic III, related to the 990s.

7 MR. THOMAS: Counsel, I'm
8 sorry, what page would that be on?

9 MS. CONNELL: Oh, no, no.
10 We're done with this exhibit.

11 Thanks, Clint.

12 MR. THOMAS: Oh, okay.

13 Q. Mr. Frazer, the 990 form
14 contains a question regarding diversion of
15 assets, correct?

16 A. Yes.

17 Q. And in 2019, the NRA disclosed
18 that there had been a significant
19 discretion of assets, right?

20 A. Yes.

21 Q. Were the only diversion of
22 assets in 990 Millie Hallow's diversion of
23 NRA money?

24 MS. EISENBERG: Objection.

25 A. Ms. Hallow's diversion was

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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,