

EXHIBIT B

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2 outstanding.

3 MR. WANG: Jim, can you pull up
4 tab 39 and mark it as Exhibit 45.

5 (Hallow Exhibit 45, National
6 Rifle Association's Form 990 for the
7 fiscal year 2019, was marked for
8 identification, as of this date.)

9 Q. Ms. Hallow, this exhibit is
10 Exhibit 45 and it is the National Rifle
11 Association's Form 990 for the fiscal year
12 2019.

13 It is a very long document and
14 I'm only going to point you to one
15 specific entry in one schedule.

16 Are you familiar with this
17 document?

18 (Witness perusing document.)

19 A. I am not.

20 Q. Do you ever review the NRA's
21 IRS Form 990?

22 A. Not to my recollection.

23 MR. WANG: If you can go forward
24 to page 91, Jim.

25 (Pause.)

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2 MR. WANG: It's actually 91 of
3 the pdf, but not pdf page 91.

4 The bottom page number you see,
5 you got it, Schedule O.

6 And can you highlight part 6,
7 line 6, toward the bottom, the third box
8 from the bottom.

9 (Pause.)

10 Q. Ms. Hallow, in the NRA's IRS
11 Form 990, Schedule O, the NRA disclosed
12 the following, "The National Rifle
13 Association became aware during 2019 of a
14 significant diversion of its assets during
15 2019 and for prior calendar years. See
16 Schedule L, Part V for explanation. In
17 addition, a staff employee, who was not a
18 disqualified person, manager, key employee
19 or highly compensated employee, diverted
20 \$41,820.37 from the NRA, but has fully
21 repaid the organization, including
22 interest, for a total of \$56,241.35."

23 Do you see that entry in this
24 page in front of you, Ms. Hallow?

25 MR. D'AGOSTINO: Objection.

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2 MR. CORRELL: Objection.

3 A. Yes, sir.

4 Q. Did you repay the NRA
5 \$56,241.35 in calendar year 2020?

6 A. I repaid an amount, I've never
7 seen this 990, I can't -- I don't
8 remember what the exact amount was.

9 Q. You have no recollection of the
10 amount of money you repaid the NRA?

11 MR. D'AGOSTINO: Objection.

12 A. No, I don't, my husband was
13 dying, this was all happening at the same
14 time.

15 I accept it and I didn't argue,
16 I just accepted this.

17 Q. You have no recollection of
18 what that total was, is that correct,
19 Ms. Hallow?

20 MS. EISENBERG: Objection.

21 MR. D'AGOSTINO: Objection.

22 A. Yes, sir.

23 Q. Do you know how that number was
24 calculated?

25 A. No, sir, I do not.

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2 Q. Do you know what expenses were
3 incorporated and what expenses were not
4 incorporated into that final number?

5 MR. D'AGOSTINO: Objection.

6 MR. CORRELL: Objection.

7 A. Not -- no, sir, not fully; I
8 don't know whether I was told at the time,
9 my recollection is no, I just accepted the
10 amount.

11 Q. Who told you the amount that
12 you had to repay?

13 MR. D'AGOSTINO: Objection,
14 Mr. Wang, we're going to weigh pretty
15 heavily into privilege if we go down that
16 road, those conversations are privileged.

17 MR. WANG: What's the basis of
18 the privilege?

19 I am not asking for any advice,
20 I am not asking for any statements, I'm
21 simply asking for who, I am not asking for
22 what your lawyer told you.

23 MR. D'AGOSTINO: You can answer
24 who told you.

25 A. My lawyer told me.

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2 Q. Which lawyer?

3 A. Alice Fisher and Chris
4 D'Agostino.

5 Q. Do you know how the number was
6 calculated?

7 MS. EISENBERG: Objection.

8 MR. D'AGOSTINO: Objection.

9 Q. Just yes or no, I'm just asking
10 if you know how they calculated the
11 number, not anything about attorney-client
12 communications.

13 A. I don't know.

14 Q. Do you know who calculated that
15 number --

16 A. Let me revise it to say I don't
17 recall, I don't know now because I don't
18 recall.

19 Q. At the time the number was
20 given to you, did you know how that number
21 was calculated?

22 MR. D'AGOSTINO: Objection.

23 A. That's what I don't recall, I
24 don't know.

25 Q. Did you write a check or was

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2 your pay docked?

3 A. I wrote a check.

4 Q. Did you receive any adverse
5 employment action as a result of having
6 diverted money from your employer?

7 MR. D'AGOSTINO: Objection.

8 MR. CORRELL: Objection.

9 A. No, it was during the period of
10 time that my husband was in hospital and
11 died.

12 If there was, I have no memory,
13 that time period has many blank spots.

14 MR. WANG: You can take this
15 down, Jim.

16 Q. Ms. Hallow, you're familiar
17 with Landini Brothers, correct?

18 A. Yes, sir.

19 Q. It's a restaurant in
20 Alexandria, Virginia?

21 A. Yes, sir.

22 Q. And it has sort of a sister
23 establishment called Cxiii Rex?

24 A. Cigar part, yes.

25 Q. Obviously before the COVID

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2 pandemic, for several years you would
3 frequently visit Landini Brothers and
4 Cxiii Rex, correct?

5 MS. EISENBERG: Objection.

6 A. I was not a member of Cxiii
7 Rex, it was a private club.

8 The only time I was there was
9 at Tony Makris's invitation and it was a
10 cigar -- it smelled like cigar.

11 Landini's was directly across
12 the street from the Mercury Group and so
13 during the day and the evenings
14 work-related was frequently at Landini's.

15 Q. Would you go there for lunch or
16 for dinner, both?

17 MS. EISENBERG: I didn't hear
18 the question, would you repeat it.

19 Q. Would you go to Landini's for
20 lunch, dinner or both?

21 MS. EISENBERG: Objection.

22 A. Generally speaking, both.

23 During the day the lunches
24 would be -- if Wayne were at the Mercury
25 Group and we were going to be there in the