



April 22, 2019

Via Email  
Mr. Wayne LaPierre  
National Rifle Association  
11250 Waples Mill Road  
Fairfax, VA 22030

RE: Documentation of expenses incurred by Ackerman McQueen (AMc) and billed to the National Rifle Association (NRA)

Dear Mr. LaPierre:

As you are well aware, one of the claims that has been asserted in the Lawsuit by the NRA against AMc is as follows:

*“Out of Pocket’ expenses that lacked meaningful documentation of NRA approvals, receipts, or other support, despite the requirements set forth in the Services Agreement”*

At your request, we issued you an American Express card and agreed to the travel fee from II&IS. Both with the intent to keep your business travel confidential and secure. Due to your demands in the lawsuit, we are notifying you that you have failed to provide written approvals, receipts, and other support for expenses related to your travel, etc. Thus, it is imperative that you provide this information timely so that we may comply with your requests for information. Please be reminded that these actions were taken expressly upon your demand.

We request that you furnish to us, in itemized detail, all approvals, receipts, and/or other support which will show documentation sufficient to meet the standards alleged per the Lawsuit for all the listed charges included as Attachment #1 (**total expenses of \$267,460.53**) to this letter. Section A - (total \$9,980.95) includes the charges incurred on your AMc American Express card issued at your request in November 2014. Section B – (total \$243,644.74). includes the air and limo charges paid to II & IS on your behalf, for travel to Bahamas, Palm Beach, New York, Los Angeles, Reno, Budapest, and Italy, and billed to the NRA. Section C – (total \$13,804.84) is for the apartment you required we rent for the period of May 27 – August 30, 2016 in Fairfax, VA for Megan Allen and billed to the NRA. At a minimum, the documentation should include date, business purpose and/or discussion, who was present and who were included as additional passengers on any air travel. Also, for the apartment, please provide the business relationship with Ms. Allen.

We appreciate your immediate attention to this request.

Yours very truly,

William Winkler  
Chief Financial Office

cc: Mr. Craig Spray  
Mr. Steve Hart

# Attach

## Section A - All Credit Card Charges

Card Name	Charge Date	Purchased From
AMEX - WLP	11/3/2014	RUSH CARD SERVICE CHARGE
AMEX - WLP	11/9/2014	GODUNOV RESTAURANT BUDAPEST
AMEX - WLP	11/9/2014	ONYX E'TTEREM BUDAPEST
AMEX - WLP	11/11/2014	ROBINSON E'TTEREM BUDAPEST
AMEX - WLP	11/11/2014	BORKONYHA, WINEKITCH BUDAPEST
AMEX - WLP	11/11/2014	COSTES RESTAURANT BUDAPEST
AMEX - WLP	11/13/2014	FOUR SEASONS GRESHAM BUDAPEST
AMEX - WLP	11/13/2014	FOUR SEASONS GRESHAM BUDAPEST
AMEX - WLP	11/15/2014	HOTEL SUISSE BELLAGIO
AMEX - WLP	11/16/2014	PANE E TULIPANI COMO
AMEX - WLP	11/16/2014	CASTADIVA RESORT BLEVIO
<b>Grand Total</b>		

## Section B - Airfare and Limo charges billed through II&IS

Vendor		Invoice number
I.I. & I.S.	II &IS Inc	2702
I.I. & I.S.	II &IS Inc	2703
I.I. & I.S.	II &IS Inc	2888
		total

## Section C - Megan Allen Apartment

Vendor		Invoice number
The Ridgewood II by Windsor		534.6.16
The Ridgewood II by Windsor		534.7.16
The Ridgewood II by Windsor		534.8.16
		total

# iment #1

Total Charge Description	Reference Number
15.00	02014307081810441006000000000000+000001500
75.38 REF# 000000000000 RESTAURANT	02014313073117117808009461346389+001818000
240.35 REF# 000000000000 RESTAURANT	02014313073117117908009461230856+005796000
63.20 REF# 000000000000 RESTAURANT	20141111371660000103119461037574+000006320
113.19 REF# 000000000000 RESTAURANT	20141111371661000103119461334591+000011319
202.60 REF# 000000000000 RESTAURANT	02014315137165165908009461146888+004850800
18.78 REF# 000000000000 LODGING	02014317134761761408009460431117+000450000
6,555.02 REF# 000000000000 LODGING	02014317134761761308009460431117+157032800
172.23 REF# 000000000000 LODGING	02014319105400400308009520600214+000013450
110.12 REF# 000000000000 RESTAURANT	20141116624755000103119624218434+000011012
2,415.08 REF# 000000000000 LODGING	02014320062475475708009624688719+000188600

**9,980.95**

amount	date	description
94,682.25	1/10/2013	WLP: - 12/17 - Air Transportation - Wash/Eleuthera - \$39,947.50 - 01/03 - Air Transportation - Nassau/Dallas - \$29,100.63 - 01/05 - Air Transportation - Dallas/Palm Beach - \$25,634.12
112,045.00	1/22/2013	WLP: - 01/17 - Air Transportation - Wash/New York - \$17,600.00 - 01/19 - Air Transportation - NTY/Los Ang./Reno - \$47,025.00 - 01/27 - Air Transportation - Reno/LA - \$7,075.00 - 01/27 - Air Transportation - Reno/Wash - \$40,345.00
36,917.49	11/1/2014	Hungary and Italy Travel for WLP: - Air Charter - Budapest/Brescia - \$17,550.00 - Car & Driver - Budapest - \$5,352.19 - Car & Driver - Italy - \$12,919.30 - Frankfurt Airport Assitance - \$1,096.00
243,644.74		

amount	date	description
\$ 4,950.00	5/27/2016	June rent, deposit and Application fee
\$ 4,500.00	6/20/2016	July rent
\$ 4,354.84	6/20/2016	August rent prorated
\$ 13,804.84		