

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK, COMMERCIAL DIVISION**

PEOPLE OF THE STATE OF NEW YORK, BY  
LETITIA JAMES, ATTORNEY GENERAL OF  
THE STATE OF NEW YORK,

Plaintiff,

v.

THE NATIONAL RIFLE ASSOCIATION OF  
AMERICA, INC., WAYNE LAPIERRE,  
WILSON PHILLIPS, JOHN FRAZER, and  
JOSHUA POWELL,

Defendants,

FRANCIS TAIT, JR., and MARIO AGUIRRE,  
individually and derivatively on behalf of THE  
NATIONAL RIFLE ASSOCIATION OF  
AMERICA, INC.,

Intervenors-Defendants,  
Cross Claimants, and  
Counter Claimants.

Index No. 451625/2020

Hon. Joel M. Cohen

Part 3

**AFFIRMATION OF TAYLOR  
BARTLETT**

TAYLOR BARTLETT, an attorney duly admitted to practice before the Courts of this State, affirms the following under penalty of perjury:

1. I am an attorney and partner at Heninger Garrison Davis, LLC, one of the counsel of record for the proposed intervenors, Francis “Frank” Tait, Jr. and Mario Aguirre, in the above-captioned action. I respectfully submit this affirmation in support of the Memorandum of Law in Support of Motion to Intervene by Francis Tait and Mario Aguirre (“Motion”) and the Proposed Answer in Intervention with Counterclaims and Cross-Claims by Francis Tait, Jr., and Mario Aguirre, individually and derivatively on Behalf of the National Rifle Association of America,

Inc. to the Amended Complaint submitted therewith, and to transmit to the Court certain key documents in this matter in support of the Motion.

2. A true and correct copy of the November 23, 2020 letter to the Honorable Joel M. Cohen from my co-counsel George Douglas in this action is attached hereto as Exhibit 1.

3. A true and correct copy of an excerpt of the redacted April 18, 2019 letter from NRA President and 1<sup>st</sup> Vice President to NRA General Counsel and Chairman of the Audit Committee, electronically filed as [NYSCEF Doc. No. 10](#) in *National Rifle Association vs. Oliver North*, New York County Supreme Court Index No. 653577/2019, is attached hereto as Exhibit 2.

4. A true and correct copy of (1) excerpts of the Second Amended Complaint, (2) Wayne LaPierre's Motion to Dismiss Plaintiff's Amended Complaint, and (3) the electronic case docket from PACER, in *Dell'Aquila, et al. v. Wayne LaPierre, et al.*, Civ. No. 3:19-cv-00679 (M.D. Tn.), are attached hereto as Composite Exhibit 3.

5. A true and correct copy of the Affidavit of John Frazer in Support of the NRA's Opposition to the Attorney General's Special Proceeding and Application to Compel Respondent Ackerman McQueen to Comply with an Investigatory Subpoena, electronically filed as [NYSCEF Doc. No. 26](#), in *People v. Ackerman McQueen and Nat'l Rifle Assn.*, New York County Supreme Court, Index No. 451825/2019, is attached hereto as Exhibit 4.

/s/ Taylor Bartlett

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TAYLOR BARTLETT

**CERTIFICATE OF WORD COUNT**

Pursuant to Commercial Division Rule 17, I certify that the foregoing AFFIRMATION OF TAYLOR BARTLETT, which was prepared using Times New Roman 12-point typeface, contains 354 words, excluding the caption and signature block. This certificate was prepared in reliance on the word-count function of the word processing system (Microsoft Word) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: June 17, 2021  
New York, New York

*/s/ Taylor Bartlett*

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Taylor Bartlett