

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

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.

§ § § § § § § § § § § §

INDEX NO. 451625/2020

AFFIRMATION
IN OPPOSITION TO MOTION TO INTERVENE

I, MORDECAI GEISLER, an attorney duly admitted to practice law in the courts of the State of New York, hereby affirm the following under penalty of perjury pursuant to CPLR § 2106:

1. I am Counsel with the firm Brewer, Attorneys & Counselors, counsel for the National Rifle Association of America (the “NRA”) in the above-captioned action.

2. I respectfully submit this Affirmation in opposition to the Motion to Intervene of Francis Tait and Mario Aguirre. I am familiar with the facts and circumstances of this action.

3. Annexed hereto as Exhibit 1 is a true and correct copy of the NRA's Bylaws, dated as of October 24, 2020.

4. Annexed hereto as Exhibit 2 is a true and correct copy of the August 6, 2020 article found at <http://taitnra.com/blog/ny-ag-sues-to-dissolve-nra/>.

5. Annexed hereto as Exhibit 3 is a true and correct copy of a letter, dated August 14, 2020, sent by Wayne LaPierre to NRA members, together with a true and correct copy of the letter's posting on the NRA's Twitter account, dated August 15, 2020.

6. Annexed hereto as Exhibit 4 is a true and correct copy of the Affidavit of Carolyn Meadows, sworn to on November 19, 2020.

7. Annexed hereto as Exhibit 5 is a true and correct copy of excerpts of the Minutes of the Meeting of the Board of Directors of the NRA, dated January 7, 2021.

8. Annexed hereto as Exhibit 6 is a true and correct copy of the Order Granting Motion to Dismiss, dated May 11, 2021, issued in *In re National Rifle Association of America and Sea Girt LLC*, Case No. 21-30085 (Bankr. N.D. Tex.) (Dkt. 740).

9. Annexed hereto as Exhibit 7 is a true and correct copy of the Affidavit of Wayne LaPierre, sworn to on November 19, 2020.

10. Annexed hereto as Exhibit 8 is a true and correct copy of the Minutes of the Meeting of the Board of Directors of the NRA, dated March 28, 2021.

Dated: July 9, 2021
New York, New York

/s/ Mordecai Geisler
Mordecai Geisler