

# **Exhibit 4**

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  
IAS Part 3  
Hon. Joel M. Cohen

**AFFIDAVIT OF CAROLYN MEADOWS**

CAROLYN MEADOWS, being duly sworn, deposes and says:

1. I am the President of the National Rifle Association of America (the "NRA"), a position to which I was elected by the NRA Board of Directors in April 2019. In my capacity as President, I continue to serve on the NRA Board of Directors; I have been a member of the NRA Board of Directors since 2003. I also served as Second Vice President of the NRA during 2017 and 2018, and served a previous, partial term as President from May to September 2018.

2. I have personal knowledge of the matters stated herein.

3. During late 2017 or early 2018, I learned that another NRA Board member, Tom King, had received a disturbing communication from Eric Schneiderman, who then served as Attorney General of the State of New York. That communication caused the NRA to become concerned that in advance of the 2020 election, it would face politically motivated hostilities from the New

York State Office of the Attorney General (the “NYAG”), possibly including an invasive investigation and a dissolution lawsuit.

4. Although the selection and supervision of NRA outside counsel are ordinarily the responsibility of the NRA’s management rather than its Board of Directors, in my capacity as an NRA elected officer, I remember participating in multiple conversations about the strategic direction the NRA should take in advance of a potential attack by the NYAG. It is my understanding that the prospect of this exact lawsuit was a key consideration motivating the NRA to retain Brewer, Attorneys and Counselors (“BAC”).

5. After this lawsuit was announced in August 2020, in my capacity as President, I directed the formation of a special litigation committee (the “Special Litigation Committee”) of the NRA Board of Directors to advise the NRA regarding its litigation strategy in this matter and related matters. I appointed three members of this new committee: myself, NRA First Vice President Charles Cotton, and NRA Second Vice President Willes Lee. Based on my review of NRA records and my conversations with Messrs. Cotton and Lee, no member of the Special Litigation Committee has any significant business relationship with the NRA, or any other relationship that would impair our oversight of the NRA’s litigation strategy. Thus, the directors composing the Special Litigation Committee are independent and disinterested. I am the Chair of the Special Litigation Committee.

6. Wayne LaPierre and John Frazer, who are respectively the NRA’s Executive Vice President and General Counsel, recused themselves from the oversight of this litigation, and the NRA instead defers to the guidance of the Special Litigation Committee. The Special Litigation Committee is advised by William “Wit” Davis, an attorney retained as independent counsel to the NRA Board of Directors.

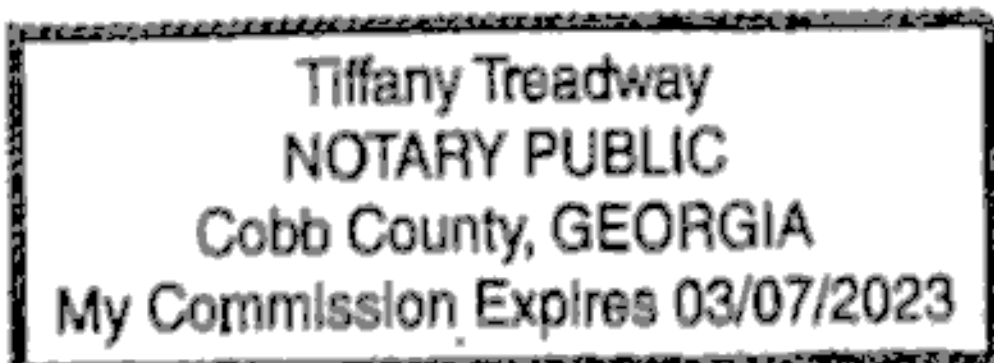
7. The Special Litigation Committee has firmly and unanimously recommended that the NRA retain BAC in this lawsuit. It is my view, and I understand it to be the view of my fellow committee members, that the NRA’s interests would be significantly impaired if the NRA were forced to retain new counsel now—two years after selecting BAC for this exact role.

8. Finally, I am familiar with the allegations advanced in the NYAG’s Complaint, and reiterated in the letter filed November 11, 2020 (the “Letter”), purportedly on behalf of “several” NRA members, that BAC’s invoices were excessive or improperly vetted or approved. I can recall this narrative first being advanced by a disgruntled director, Lt. Col. Oliver North, in December 2018, in response to BAC’s scrutiny of invoicing practices by Lt. Col. North’s own employer, Ackerman McQueen. During early 2019, Lt. Col. North attempted to enlist me in his effort to “get rid” of BAC. Oliver North was a longtime friend, and I carefully considered his concerns. Ultimately, he and I did not agree. In any event, the Special Litigation Committee does not advise that the NRA present any BAC attorneys as witnesses in this case, and certainly does not view their testimony as “necessary.” To the contrary, I expect that the NRA would object aggressively on grounds of attorney-client privilege to any attempt to call its counsel as witnesses.

Carolyn Meadows  
Carolyn Meadows

Sworn and subscribed to before me  
this 19<sup>th</sup> day of November, 2020.

Tiffany Treadway  
Notary Public



My commission expires 03/07/2023