

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

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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.	:
-----X	

Index No. 451625/2020

IAS Part 3

Hon. Joel M. Cohen

**AFFIRMATION OF WILLIAM B. FLEMING IN SUPPORT OF JOHN FRAZER'S
MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

WILLIAM B. FLEMING, an attorney duly authorized to practice in the State of New York does hereby affirm the following under penalties of perjury as follows:

1. I am a member of the law firm of Gage Spencer & Fleming LLP, counsel to defendant John Frazer ("Frazer"). I respectfully submit this affirmation in support of, and to present to the Court exhibits referenced within, the Memorandum of Law in Support of Frazer's Motion to Dismiss Plaintiff's Amended Complaint.

2. Annexed hereto as Exhibit 1 is a true and correct copy of The National Rifle Association of America Bylaws as amended October 24, 2020.

3. Annexed hereto as Exhibit 2 is a true and correct copy of a transcript dated September 9, 2021, of an oral argument before the Court of a motion to intervene.

4. Annexed hereto as Exhibit 3 is a true and correct copy of the United States Bankruptcy Court's Order Granting Motions to Dismiss dated May 11, 2021.

5. Annexed hereto as Exhibit 4 is a true and correct copy of the National Rifle Association of America's 2018 CHAR500, New York State's Annual Filing for Charitable Organizations.

Dated: New York, New York
September 15, 2021

/s/ William B. Fleming

William B. Fleming