

Mot. Seq. Nos. 16, 17, and 18

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 of Jonathan Conley in Opposition  
to Defendants' Motions to Dismiss**

JONATHAN CONLEY, an attorney duly admitted to practice before the Courts of this State, hereby affirms the following under the penalty of perjury pursuant to CPLR § 2106:

1. I am an Assistant Attorney General in the Enforcement Section of the Charities Bureau of the Office of the New York State Attorney General ("OAG" or "Attorney General").
2. I submit this affirmation in opposition to Defendants National Rifle Association of America, Inc, Wayne LaPierre, and John Frazer's motions to dismiss this action for the limited purpose of providing the Court with a true and correct copy of the document referenced in the accompanying memorandum of law.
3. Attached as Exhibit A is a true and correct copy of a redline comparison of the OAG's Amended and Supplemented Complaint (NYSCEF 333) and original complaint (NYSCEF 11) in this action.

Dated: New York, New York  
October 15, 2021

/s/ Jonathan Conley

Jonathan Conley

Mot. Seq. Nos. 16, 17, and 18

**Attorney Certification Pursuant to Commercial Division Rule 17**

I, Jonathan Conley, an attorney duly admitted to practice law before the courts of the State of New York, certify that the Affirmation in Opposition to Defendants' Motions to Dismiss this Action in Mot. Seq. Nos. 16, 17, and 18 complies with the word count limit set forth in Rule 17 of the Commercial Division of the Supreme Court ([22 NYCRR 202.70\(g\)](#)) because the affirmation contains 174 words, excluding the parts exempted by Rule 17. In preparing this certification, I have relied on the word count of the word-processing system used to prepare this memorandum of law and affirmation.

Dated: October 15, 2021  
New York, New York

/s/ Jonathan Conley

Jonathan Conley