

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

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	:	Index No.: 451625/2020
PEOPLE OF THE STATE OF NEW	:	
YORK,	:	Hon. Joel M. Cohen
	:	
<i>Plaintiff,</i>	:	Motion Sequence No. 021
	:	
v.	:	
	:	AFFIRMATION OF
THE NATIONAL RIFLE ASSOCIATION	:	Christopher W. Cox
OF AMERICA, INC., ET AL.,	:	
	:	
<i>Defendants.</i>	:	
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Christopher W. Cox, pursuant to C.P.L.R. §2106, and under the penalties of perjury, affirms as follows:

1. I am a resident of Alexandria, Virginia and received a subpoena duces tecum for certain information in the above-captioned matter. For twenty-four years, I served in various positions at the National Rifle Association, including seventeen years as the executive director of the National Rifle Association's Institute of Legislative Action.

2. I am fully familiar with the facts set forth in this affirmation, which is submitted in support of my motion to permanently seal the accompanying Letter Motion (Exhibit 1 to this Affirmation), and Exhibits 1, 2, and 4 attached to that Motion (Exhibits 2, 3, and 4 to this Affirmation) (the "Confidential Documents," submitted separately to the Court for *in camera* review).

3. In January 2019, I signed an employment agreement with the NRA. That agreement contains an extensive confidentiality provision that prohibits the disclosure of the terms

of the agreement. Under the terms of the agreement, the confidentiality provisions survive the termination of the agreement.

4. The agreement contains sensitive non-public financial information of the NRA, including the benefits that it provided me as an executive during my tenure at the NRA.

5. The agreement also contains my own sensitive financial information, including various benefits the NRA provided me during my employment.

6. I have filed a letter motion seeking to recover expenses arising from my compliance with the subpoena duces tecum issued by the New York Attorney General. That motion quotes provisions of the confidential employment agreement. Attached to that motion are two exhibits that are also confidential. Exhibit 1 is the employment agreement itself and Exhibit 4 is an email between my attorneys and the NRA's attorney that quotes provisions of the agreement.

7. Accordingly, I am filing by order to show cause its motion to seal the Confidential Documents, and to permit redaction of all text in any document filed publicly in this action quoting or describing the Confidential Documents.

8. The Confidential Documents contain confidential and proprietary business information of the NRA. The Confidential Documents also contain sensitive financial information related to my benefits while I was employed with the NRA. The NRA could suffer competitive harm if the Confidential Documents were to be filed publicly. Additionally, my privacy rights as a non-party in this matter would be infringed if the Confidential Documents were to be filed publicly.

9. I have not made any prior application for the relief requested herein.

10. I stand ready to submit any additional documentation that the Court may require in support of the foregoing application.

WHEREFORE, for the foregoing reasons, it is respectfully requested that this Court grant Christopher W. Cox's motion to permanently seal the Confidential Document.

Dated: Alexandria, Virginia
December 6, 2021

/s/ Christopher W. Cox
Christopher W. Cox

CERTIFICATE OF COMPLIANCE

1. The following statement is made in accordance with N.Y.C.R.R. §202.70, Rule 17.
2. The foregoing Affirmation of Christopher W. Cox was prepared in the processing system Microsoft Word, with Times New Roman typeface, 12-point font.
3. Relying on the word count of the word-processing system, the total number of words in this document, exclusive of the caption, table of contents, table of authorities, and signature block is 456 words.

Dated: New York, New York
December 6, 2021

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** Pro hac vice application forthcoming*

Attorneys for Christopher W. Cox