

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
Motion Seq. No. 21

**AFFIRMATION IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO ORDER TO SHOW CAUSE TO SEAL**

STEPHEN C. THOMPSON, an attorney duly admitted to the Bar of this State,
affirms under penalties of perjury pursuant to Civil Practice Law and Rules 2016 as follows:

1. I am an Assistant Attorney General in the Office of Letitia James, Attorney General of the State of New York, who appears on behalf of the People of the State of New York in this action.

2. I submit this Affirmation in support of Plaintiff's opposition to nonparty Christopher Cox's application by order to show cause seeking to seal certain records (Motion Seq. No. 21).

3. I am familiar with the facts and circumstances set forth in this Affirmation, which are based upon my personal knowledge and information contained in the files of the Office of the Attorney General.

4. A true and correct copy of Defendant National Rifle Association of America's ("NRA") Internal Revenue Service Form 990 for 2019 is attached as Exhibit A to this Affirmation. In particular, I respectfully direct the Court to information concerning Mr. Cox's salary and benefits found in Part VII, Section A, Line 2 (PDF page 8); Schedule J, Part 2, Line 3 (PDF page 42); and Schedule J, Part 3 (PDF pages 44-45) of the Form 990.

5. A true and correct copy of Defendant Wayne LaPierre's January 2021 employment agreement with the NRA, which was admitted as NYAG Exhibit 50 in *In re National Rifle Association of America*, No. 21-30085-hdh11 (Bankr. N.D. Tex.) (the "Bankruptcy"), is attached as Exhibit B to this Affirmation. This exhibit is excerpted from a collection of exhibits that were publicly filed as ECF No. 761 in that action.

6. A true and correct copy of the 2018 letter extending Defendant Wayne LaPierre's employment contract with the NRA and outlining certain post-employment benefits, which was admitted as NYAG Exhibit 138 in the Bankruptcy, is attached as Exhibit C to this Affirmation. This exhibit is excerpted from a collection of exhibits that were publicly filed as ECF No. 764 in that action.

Dated: New York, New York
December 20, 2021

/s Stephen Thompson
Stephen C. Thompson