

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 MONICA CONNELL IN FURTHER SUPPORT OF
THE ATTORNEY GENERAL'S MOTION TO DISMISS
THE NRA'S AMENDED COUNTERCLAIMS**

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

1. I am an Assistant Attorney General and Special Counsel in the Office of the New York State Attorney General ("OAG" or "Attorney General").

2. I submit this affirmation in further support of the Attorney General's motion to dismiss Defendant National Rifle Association of America, Inc.'s ("NRA") Amended Counterclaims for the limited purpose of providing the Court with true and correct copies of the public documents referenced in the accompanying reply memorandum of law in support of the Attorney General's Motion to Dismiss the NRA's Amended Counterclaims, dated January 25, 2022.

3. Attached as Exhibit A is a true and correct copy of the NRA's 2019 IRS Form 990, filed on November 18, 2020.

4. Attached as Exhibit B is a true and correct copy of the NRA's 2020 IRS Form 990, filed on November 15, 2021.

Dated: New York, New York
January 25, 2022

/s/ Monica Connell

Monica Connell

Attorney Certification Pursuant to Commercial Division Rule 17

I, Monica Connell, an attorney duly admitted to practice law before the courts of the State of New York, certify that this Affirmation in Further Support of the Attorney General's Motion to Dismiss the NRA's Counterclaims 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 165 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 affirmation.

Dated: January 25, 2022
New York, New York

/s/ Monica Connell
Monica Connell