

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 OPPOSITION
TO THE NRA'S CPLR 3104(d)
MOTION SEEKING REVIEW
OF THE SPECIAL MASTER'S
DISCOVERY ORDER
GRANTING PLAINTIFF'S
REQUEST FOR
PRODUCTION OF THE
REQUESTED DOCUMENTS**

Monica Connell, 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 the National Rifle Association of America, Inc.'s ("NRA") Motion Pursuant to CPLR 3104(d) for Review of the Special Master's Rulings Granting Plaintiff's request for Production of the Requested Documents.
3. Attached as Exhibit 1 is a true and correct copy of the OAG's July 6, 2022 letter application, attaching Exhibits C-E including excerpts of testimony of David Coy as Ex. D thereto, pp. 211-235

Dated: New York, New York
August 2, 2022

A handwritten signature in black ink, appearing to read 'Monica Connell', written over a horizontal line.

Monica Connell