

EXHIBIT “12”

From: [Wang, William](#)
To: [Svetlana Eisenberg](#)
Cc: [Connell, Monica](#)
Subject: People of the State of New York v National Rifle Association of America, et al., Index No. 451625/2020
Date: Thursday, March 17, 2022 4:12:03 PM

Counsel,

We understand that the NRA and Ackerman McQueen have recently settled the litigation National Rifle Association of America v. Ackerman McQueen, Inc., et al. Index No. 3:19-cv-02074-G (N.D. Tx) and National Rifle Association of America v. Ackerman McQueen, Inc. and Mercury Group, Inc. Index No. CL19002067 (Circuit Court of Alexandria, Virginia).

We hereby request production of any and all settlement agreements entered into between the NRA and Ackerman McQueen. The OAG would agree to stipulate to the confidentiality of the settlement agreement.

Please provide copies of any settlement agreements entered into with Ackerman McQueen, Mercury Group, and any of the other parties in the litigations named above by March 31, 2022.

Regards,

Will

William Wang | Assistant Attorney General

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