

EXHIBIT “52”

PEOPLE OF THE STATE OF NEW YORK, BY LETITIA JAMES,	§	
ATTORNEY GENERAL OF THE STATE OF NEW YORK,	§	
	§	INDEX NO. 451625/2020
	§	
Plaintiff,	§	Hon. Joel M. Cohen
	§	
v.	§	Motion Sequence No. 44
	§	
THE NATIONAL RIFLE ASSOCIATION OF AMERICA ET AL.,	§	
	§	
Defendants.	§	

AFFIDAVIT OF PEYTON KNIGHT

STATE OF [] ☒ A)

COUNTY OF [] *Fairfax*

I, Peyton Knight, being duly sworn, depose and state:

1. I am over twenty-one years of age and I am fully competent to testify herein and swear that all of the facts and statements herein contained are true and correct and that, except as expressly noted otherwise, I have personal knowledge of the same.

2. I have been employed at Membership Marketing Partners, Inc. (“MMP”) for approximately 15 years. I have held various positions at MMP, and I currently serve as Chief Executive Officer, a position I’ve held for the past two years and four months. I have been responsible for various aspects of the National Rifle Association of America (“NRA”) account over the course of my tenure at MMP.

3. I have been involved in planning, managing, advising and executing campaigns directed at membership acquisition and fundraising for the NRA.

4. I work closely with the officers and directors of the NRA in support of NRA membership and fundraising.

5. Accordingly, my colleagues and I monitor the public domain for issues in connection with Second Amendment advocacy and other aspects of the NRA's mission. Part of my job is to have an awareness of the issues which NRA members and prospective members care about, or should be made aware, as well as how best to communicate with our audience with an eye toward membership prospecting, retention, and fundraising.

6. Politicians and media figures frequently make statements about the NRA's activities and positions. Rhetoric like this can, and does, impact the public perception of the NRA—and by extension, its membership and fundraising efforts.

7. I am aware that New York Attorney General ("NYAG") Letitia James has made statements in opposition to the NRA and its mission.

8. Many of these statements generated adverse media attention about the NRA.

9. On August 6, 2020, the NYAG conducted a press conference announcing the filing of a lawsuit to dissolve the NRA.¹

10. Simultaneously, the NYAG's office executed a public relations campaign that resulted in widespread negative media attention for the Association.²

¹ See media advisory, "Attorney General James Files Lawsuit to Dissolve NRA," dated August 6, 2020 (Exhibit 7).

² See *The Wall Street Journal* article, "New York Attorney General Seeks to Dissolve National Rifle Association," dated August 7, 2020 (Exhibit 8); *The New York Times* article, "New York Attorney General Sues N.R.A. and Seeks Its Closure," dated August 6, 2020 (Exhibit 9); *The*

11. I believe the ongoing litigation with the NYAG has had an impact on NRA's public perception among its members, potential members, and donors.

12. More recently, the NYAG is seeking a court-imposed monitor to oversee the assets and business of the Association.

13. It is my opinion that the appointment of any monitor to run the NRA at the NYAG's behest would significantly harm the NRA's ability to recruit members, retain members, and fundraise. At the very least, from the standpoint of public perception, it would make the NRA a subsidiary of a political agent who has been opposed to its mission.

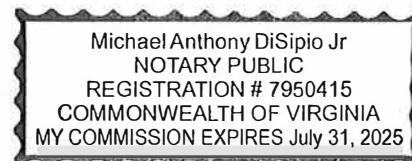
14. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 13th day of March 2023.


Peyton Knight, Affiant

SUBSCRIBED AND SWORN to, on this 13 day of March 2023.


NOTARY PUBLIC



Washington Post article, "New York Attorney General Seeks to Dissolve NRA," dated August 6, 2020 (Exhibit 10); *New York Daily News* article, "NRA's Non-Profit Status In The Cross-Hairs of State Attorney General James Amid Allegations of Multi-Million Dollar Fraud," dated August 6, 2020 (Exhibits 11 and 11a); CNN report, "New York Attorney General Files Lawsuit to Dissolve the National Rifle Association, dated August 6, 2020 (Exhibit 12); and MSNBC report, "NY Attorney General Sues to 'Dissolve' the NRA 'In Its Entirety'," dated August 6, 2020 (Exhibit 13).

My commission expires: 07/31/2025