

## **EXHIBIT AK**

NATIONAL RIFLE ASSOCIATION OF AMERICA  
11250 WAPLES MILL ROAD  
FAIRFAX, VIRGINIA 22030



WAYNE LAPIERRE  
Executive Vice President

## POLICY STATEMENT

**To:** All NRA Staff

**From:** Wayne LaPierre *WL*  
Executive Vice President

**Date:** February 27, 2012

**Subject:** Approval Procedures for Purchase Agreements and Contracts in Excess of \$100,000

**References:** February 8-9, 1997 Board of Directors Meeting, Section III (F) NRA Policy Manual; June 8, 1998 Board of Directors Meeting, Section III (I) NRA Policy Manual

**Attachments:** 1) Business Case Analysis Sheet  
2) Contract Review Signature Sheet

**Purpose:** To clearly define the signature procedure and distribution for purchase agreements and contracts in excess of \$100,000.

**Background:** In 1988, the Board of Directors established the following policy "....any agreement by NRA or NRA-ILA in excess of \$50,000 cannot be executed without the approval of the President and one of the two Vice Presidents." In 1991, the amount of any agreement was raised to \$100,000.

There are currently two policies concerning signature approval for purchase agreements and contracts in excess of \$100,000 in a 12-month period. The first policy referenced below was approved at the February 8-9, 1997 Board of Directors meeting requiring a business case analysis on all contracts over \$100,000 before the required sign-off approval.

**"February 8-9, 1997 Board of Directors"**

MOVED, Henceforth, all contracts involving over \$100K in a 12-month period are required to have a business case analysis performed and no contract will begin before the required sign-off approval as is required.

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The second policy referenced below was approved at the June 8, 1998 Board of Directors Meeting describing the Officer signature requirement.

**"June 8, 1998 Board of Directors"**

**...V. Contracts and Purchase Orders**

Procurement shall be done through a formal system with regular reporting capabilities. Contracts shall be used in conjunction with or in lieu of purchase orders, in accordance with the following guidelines:

- A. All purchase agreements or contracts requiring payments greater than \$100,000 in any twelve month period, must have the prior written approval of the President and the First or Second Vice Presidents before execution or renewal.
- B. Expenses routinely incurred in the ordinary course of business on a periodic, recurring basis (such as paper, postage, and mail production expenses) are exempt from the requirements of paragraph V.A. above, provided that the President, Vice President(s) and Finance Committee chair are furnished on a quarterly basis with a description of, including estimated amounts and names of vendors, agreements, and contracts which the Treasurer deems to be subject to this exemption.

**VI. Confidentiality Agreements**

Confidentiality agreements will be required in any situation where proprietary information is to be shared by the NRA with parties outside the NRA."

**Action:** To fully comply with the signature procedure for all purchase agreements and contracts in excess of \$100,000 the following procedure must be followed:

1. When approving a contract in excess of \$100,000 a packet consisting of a copy of the contract, a completed business case analysis, and a contract review signature sheet will be prepared. This packet will be sent to the individuals and NRA divisions listed on the contract review signature sheet for signature **in the order they appear**. A copy of the business case analysis sheet, and contract review signature sheet are attached for your information.
2. Once all of the in-house NRA signatures are completed on the contract review signature sheet, the packet will be taken to the Office of the Secretary for signature of the President and the First and Second Vice Presidents.
3. Upon receipt of the Board Officers' signatures, the packet is returned to the Responsible Officer. The Responsible Officer will forward two contracts to the company or business for their signature on both contracts.

4. Once the company or business signs and returns the contracts to the Responsible Officer, the Responsible Officer then signs the contracts and returns one original of the completed contract to the company or business.
5. The Responsible Officer will make distribution as follows:
  - a. Original contract and one copy to the Office of General Counsel.
    - (l) The Office of General Counsel reviews, scans, and sends the original contract to Financial Services.
  - b. One copy to the Office of Treasurer.
  - c. One copy retained by Responsible Officer initiating the contract.
  - d. One copy to Chief of Staff.
  - e. One copy to the Office of the Secretary.

Attachment 1

**BUSINESS CASE ANALYSIS SHEET**

Contract Name: \_\_\_\_\_

Purpose: \_\_\_\_\_

Yearly Dollar Amount: \_\_\_\_\_

Terms on the Contract: \_\_\_\_\_

- Final Bidders:
- 1. \_\_\_\_\_
  - 2. \_\_\_\_\_
  - 3. \_\_\_\_\_

Analysis Prepared By: \_\_\_\_\_

Date: \_\_\_\_\_

Analysis:

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Attachment 2

CONTRACT REVIEW SIGNATURE SHEET

Contract Name: \_\_\_\_\_

Amount: \_\_\_\_\_

Negotiated By: \_\_\_\_\_

Division: \_\_\_\_\_

Responsible Officer Approval: \_\_\_\_\_

Business Case Analysis Prepared By: \_\_\_\_\_

Date: \_\_\_\_\_

Legal Review: \_\_\_\_\_

Remarks: \_\_\_\_\_ (Date)

(Office of General Counsel)

Purchasing Review: \_\_\_\_\_

(Purchasing Division) \_\_\_\_\_ (Date)

Financial & Business Review: \_\_\_\_\_

(Financial Services) \_\_\_\_\_ (Date)

\_\_\_\_\_  
(Treasurer's Office) \_\_\_\_\_ (Date)

Executive Vice President: \_\_\_\_\_

(Date)

**Signature required over \$100,000 – Contracts cannot be entered into or executed without prior written approval from the President and First or Second Vice President.**

President: \_\_\_\_\_ (Date)

1<sup>st</sup> Vice President: \_\_\_\_\_ (Date)

2<sup>nd</sup> Vice President: \_\_\_\_\_ (Date)

**Please return to the Office of the Secretary**