

Exhibit B

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

**RESPONSES AND
OBJECTIONS OF
PLAINTIFF THE PEOPLE OF
THE STATE OF NEW YORK
TO DEFENDANT NRA's
CONTENTION
INTERROGATORIES**

Pursuant to CPLR Article 31 and Rule 11-a of the Rules of the Commercial Division of the Supreme Court, Plaintiff, the People of the State of New York, through the Office of the Letitia James, Attorney General Attorney General for the State of New York ("Plaintiff"), hereby objects and responds to Defendant The National Rifle Association of America's ("Defendant NRA") Contention Interrogatories (the "Interrogatories"), as follows.

GENERAL OBJECTIONS

The following general responses and objections ("General Objections") are incorporated into each specific response and objection as if fully set forth therein:

1. These objections apply to the Interrogatories in their entirety, including to Defendant NRA's Instructions and Definitions, as if such objections were set forth in full in the response to each of the delineated Interrogatories and are not necessarily repeated in response to

each individual Interrogatory. The assertion of the same, similar, or additional objections in the Plaintiff's specific objections to an individual Interrogatory, or the failure to assert any additional objection to an Interrogatory, does not and shall not be deemed to waive any of Plaintiff's general objections as set forth in this section.

2. Plaintiff objects to the Interrogatories' Definitions of the Plaintiff to the extent they include the Attorney General or Office of the Attorney General ("OAG"), "You", and "Your", or "its agents, employees, constituent bureaus, and other departments".

3. Plaintiff objects to the Interrogatories' Definitions and Instructions as overbroad, vague, ambiguous, confusing, improper, unduly burdensome, not material and necessary to the prosecution or defense of the action, not reasonably calculated to lead to discovery of evidence material or necessary to the prosecution or defense of the action, and to the extent they require Plaintiff to form or accept a legal conclusion in order to respond.

4. Plaintiff objects to the Interrogatories in their entirety and to each and every Interrogatory to the extent that they seek information that is not relevant to, nor reasonably calculated to lead to, discovery of evidence relevant to, the allegations asserted in the Second Amended and Supplemental Verified Complaint, dated May 2, 2022 (NYSCEF No. 646, hereinafter the "Second Amended Complaint").

5. Plaintiff objects to the Interrogatories in their entirety and to each and every Interrogatory to the extent that they are not sufficiently limited in time and/or scope.

6. Plaintiff objects to the Interrogatories in their entirety and to each and every Interrogatory to the extent that they seek to impose obligations that are broader than or inconsistent with those set forth in the Civil Practice Law and Rules and the Rules of the Commercial Division

of the Supreme Court.

7. Plaintiff objects to the Interrogatories and to each and every Interrogatory to the extent that they seek information not within Plaintiff's knowledge or which calls for information that (1) is already in Defendant NRA's possession, custody, or control; (2) is equally available to Defendant NRA or attainable by Defendant NRA from another source that is more convenient, less burdensome, or less expensive; or (3) is publicly available.

8. Plaintiff objects to the Interrogatories and to each and every Interrogatory to the extent that they seek information which is privileged on various grounds, including as set forth in CPLR 3101, work product doctrine, concerns information prepared in anticipation of litigation or for trial, is confidential, sensitive, or is covered by the public interest privilege, deliberative process privilege, common interest privilege, and/or law enforcement privilege, relates to the privacy interests of nonparties, or is otherwise protected from disclosure by law. The inadvertent production of any document or information that is privileged, was prepared in anticipation of litigation, or is otherwise immune from discovery, shall not constitute a waiver of any privilege or of any other ground for objecting to discovery with respect to that document or information or of Plaintiff's right to object to the use of that information during any proceeding in this litigation or otherwise.

9. Plaintiff objects to any Interrogatory which calls for opinions or conclusions of law.

10. By responding to the Interrogatories and to each of the Interrogatories, Plaintiff does not concede the materiality of the Interrogatories. These responses are made expressly subject to, and without waiving or intending to waive, any questions or objections as to the

competency, relevancy, materiality, privilege, or admissibility as evidence or for any other purpose, of any of the documents or information produced in response hereto, or of any Interrogatory, in any proceeding including the trial of this action or any subsequent proceeding.

11. The responses set forth below are based on information currently available to Plaintiff, who reserves the right to supplement, amend, or correct these responses.

12. Plaintiff objects to the NRA's Interrogatories in their entirety because these contention interrogatories exceed the number (25) of interrogatories that are permitted under the Rules of the Commercial Division of the Supreme Court. The NRA previously served two sets of interrogatories, which together totaled 25 interrogatories, including subparts. By responding to the individual Interrogatories herein, Plaintiff does not waive this objection that the interrogatories are improper absent court approval.

RESPONSES TO CONTENTION INTERROGATORIES

Contention Interrogatory No. 1

For each transaction that you contend is a wrongful related party transaction with regard to which you are entitled to relief—whether pursuant to your First Cause of Action, the Thirteenth Cause of Action, or otherwise—specify the legal basis for and identify with particularity all facts or evidence on which you base such contention, including but not limited to any contention that the defense set forth in N-PCL 715(j) is unavailable.

RESPONSE TO CONTENTON INTERROGATORY NO. 1:

Plaintiff incorporates the General Objections stated above as if fully stated herein. In addition, Plaintiff objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and concerns summary statements that are supported by particular factual allegations in the Second Amended Complaint. This Interrogatory is also overly broad and unduly burdensome insofar as it seeks repetitive recitation of the record and to the extent it seeks information that is readily and

equally accessible to Defendant NRA from transcripts of depositions and testimony given by witnesses in this action, including current or former NRA directors, officers, and employees and documents that Defendants and others produced in this action. Plaintiff further objects to this Interrogatory as overbroad and unduly burdensome to the extent it calls for Plaintiff to reproduce, in narrative answer format, material from the testimony of current or former NRA directors, officers, and employees and documents that Defendants and third parties produced to Plaintiff, which have already been produced to Defendants. Plaintiff further objects to the extent that the Interrogatory seeks information protected by the attorney work product privilege, trial preparation privilege and/or calls for the mental impressions of counsel. Notwithstanding the foregoing objections and without waiver of the same, Plaintiff incorporates by reference the allegations in the Second Amended Complaint, the evidentiary record, the responses to other Interrogatories herein, and the expert reports of Eric Hines and Jeffrey Tenenbaum, dated September 16, 2022 and October 7, 2022 (collectively, "Plaintiff's Expert Reports") and states that the related party transactions occurring from 2015 through the present violated New York Not for Profit Corporation Law ("N-PCL") § 715, Estates Powers and Trusts Law ("EPTL") § 8-1.9 and the NRA's policies, including the Statement of Corporate Ethics, Related Party Transaction Policy, Conflict of Interest Policy, and Procurement and Purchasing Policies the ("NRA's Relevant Policies"), because, *inter alia*, they were not properly approved by the Board or the Audit Committee in advance; such transactions were not determined by the Board or the Audit Committee to be fair, reasonable and in the NRA's best interest at the time of such determination; the Board or the Audit Committee failed to consider alternative transactions to the extent available; the Board or the Audit Committee failed to contemporaneously document in writing the basis for

the approval, including its consideration of any alternative transactions; where related party transactions were retrospectively ratified, the Board or Audit Committee failed to conduct a sufficient review to find in good faith that the transaction was fair, reasonable and in the corporation's best interest at the time the corporation approved the transaction; where related party transactions were retrospectively ratified, the Board or Audit Committee failed to document in writing the nature of the violation and the basis for the board's or committee's ratification of the transaction and failed to put into place procedures to ensure that the NRA complies with the NRA's internal requirements and the law pertaining to related party transactions in the future. Further, the directors, officers and key persons who had an interest in the related party transactions failed to disclose the material facts concerning the same in good faith to the board, or an authorized committee thereof. Improper related party transactions under N-PCL §§ 102(a)(24) and 715, EPTL § 8-1.9 and the NRA's relevant policies include the NRA's transactions with Wayne LaPierre; Wilson Phillips; Joshua Powell; John Frazer; Marion Hammer; David Keene; Dave Butz; Lance Olson; Sandra Froman; Michael Marcellin; Kyle Weaver; Wayne Sheets; Bart Skelton; Scott Bach; Robert Dowlut; Colleen Gallagher; Susan LaPierre; Douglas Hamlin; Tom King; Edward J. Land; Jr.; Carolyn Meadows; Lt. Col. Oliver North; Ted Nugent; Shemane Nugent; James W. Porter II; Kayne Robinson; Mercedes V. Schlapp; Tyler Schropp; Tom Selleck; and Robert Marcario.

Contention Interrogatory No. 2

For each alleged "violation of the whistleblower protections of N-PCL 715-b or EPTL 8-1.9"² that you contend occurred, specify the legal basis for and identify with particularity all facts or evidence on which you base such contention.

RESPONSE TO CONTENTION INTERROGATORY NO. 2:

Plaintiff incorporates the General Objections stated above as if fully stated herein. In addition,

Plaintiff objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and concerns summary statements that are supported by particular factual allegations in the Second Amended Complaint. This Interrogatory is also overly broad and unduly burdensome insofar as it seeks repetitive recitation of the record and to the extent it seeks information that is readily and equally accessible to Defendant NRA from transcripts of depositions and testimony given by witnesses including current or former NRA directors, officers, and employees and documents produced in this action which are all available to Defendant NRA and largely produced by Defendant. Plaintiff further objects to this Interrogatory as overbroad and unduly burdensome to the extent it calls for Plaintiff to reproduce, in narrative answer format, material from the testimony of witnesses and documents that have been produced to Defendants. Plaintiff further objects to the extent that the Interrogatory seeks information protected by the attorney work product privilege, trial preparation privilege and/or calls for the mental impressions of counsel. Notwithstanding the foregoing objections and without waiver of the same, Plaintiff incorporates by reference the allegations in the Second Amended Complaint, the evidentiary record, the responses to other Interrogatories herein, and the Plaintiff's Expert Reports and states that the NRA failed to adopt, and oversee the implementation of, and compliance with, a whistleblower policy compliant with N-PCL § 715-b and EPTL § 8-1.9 to protect from retaliation persons who report suspected improper conduct which provided that no director, officer, key person, employee or volunteer of a corporation who in good faith reports any action or suspected action taken by or within the corporation that is illegal, fraudulent or in violation of any adopted policy of the corporation shall suffer intimidation, harassment, discrimination or other retaliation or, in the case of employees, adverse employment consequence. The NRA failed to adopt, and oversee the implementation of, and compliance with a

legally-compliant policy under with N-PCL § 715-b and EPTL§ 8-1.9 before January 2020, including but not limited to a policy containing procedures for the reporting of violations or suspected violations of laws or policies, procedures for preserving the confidentiality of reported information; a requirement that the NRA appoint a designee to administer the whistleblower policy; a requirement that the person who is the subject of a whistleblower complaint not be present at or participate in board or committee deliberation or vote on the matter relating to such complaint; and a requirement that a copy of the policy be distributed to all trustees, officers, employees and volunteers, with instructions on how to comply with the procedures set forth in the policy. Both before and after January 2020, when the NRA adopted a new whistleblower policy, the NRA failed to implement and enforce whistleblower protections in compliance with New York law and under its own policies. Whistleblowers include Esther Schneider, Lt. Col. Oliver North, Craig Spray, Richard Childress, Tim Knight, Allen West, Sean Maloney, Emily Cummins, Phillip Journey, Rocky Marshall, members of the FSD who came forward with the Top Concerns memo, and whistleblowers identified anonymously in David Coy's 2007 memorandum, as well as other complainants whose identities were not revealed by the NRA. The NRA permitted whistleblower retaliation, intimidation and harassment in a variety of ways, including by commencing an action to remove one whistleblower as a member, allowing defendant John Frazer, in his role as Secretary and General Counsel, to circulate emails written by former NRA President Carolyn Meadows denigrating and criticizing whistleblowers, removing and/or failing to grant committee assignments to whistleblowers, permitting the maintenance of "burn books" about employees, allowing former NRA President Marion Hammer and current NRA Vice President Willes Lee to exchange emails with other Board members approving of whistleblower retaliation, making public criticisms of

whistleblowers, and terminating the employment of a whistleblower. The NRA also failed to timely and properly investigate and address whistleblower complaints.

Contention Interrogatory No. 3

With regard to the First Cause of Action (Request for the Appointment of an Independent Compliance Monitor and For Other Injunctive Relief), state with particularity all legal bases for and all facts or evidence, including but not limited to those pertaining to alleged failures at the NRA to address a conflict of interest or a potential conflict of interest, which you contend entitles you to the relief you seek. The NRA has no objection if in responding to this Interrogatory you cross-reference a response to the NRA's other interrogatories. However, this Interrogatory requires you to set forth any additional information that is not addressed by your responses to the NRA's other interrogatories.

RESPONSE TO CONTENTION INTERROGATORY NO. 3:

Plaintiff incorporates the General Objections stated above as if fully stated herein. In particular, without limitation, Plaintiff objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and concerns summary statements that are supported by particular factual allegations in the Second Amended Complaint. This Interrogatory is also overly broad and unduly burdensome insofar as it seeks repetitive recitation of the record and to the extent it seeks information that is readily and equally accessible to Defendant NRA from transcripts of depositions and testimony given by current or former NRA directors, officers, and employees and documents that Defendants produced to Plaintiff. Plaintiff further objects to this Interrogatory as overbroad and unduly burdensome to the extent it calls for Plaintiff to reproduce, in narrative answer format, material from the testimony of current or former NRA directors, officers, and employees and documents that Defendants and third parties produced to Plaintiff that has already been produced to Defendants. Plaintiff further objects to the extent that the Interrogatory seeks information protected by the attorney work product privilege, trial preparation privilege and/or calls for the mental impressions of counsel. Notwithstanding the foregoing objections and without waiver of the same, Plaintiff

incorporates by reference the allegations in the Second Amended Complaint, the evidentiary record, the responses to other Interrogatories herein, and the Plaintiff's Expert Reports and states that the NRA failed to address a conflict of interest or potential conflict of interest through the transactions occurring from 2015 through the present, which violated New York Not for Profit Corporation Law ("N-PCL") §§ 715, 715-a, Estates Powers and Trusts Law ("EPTL") § 8-1.9 and the NRA's Relevant Policies including but not limited to the Conflict of Interest Policy, because, *inter alia*, they were not properly evaluated for conflicts and not approved by the Board or the Audit Committee in advance; such transactions were not determined by the Board or the Audit Committee to be in the NRA's best interest at the time of such determination; the Board or the Audit Committee failed to consider alternative transactions to the extent available; the Board or the Audit Committee failed to contemporaneously document in writing the basis for the approval, including its consideration of any alternative transactions; ratified the transaction by finding in good faith that it was fair, reasonable and in the corporation's best interest at the time the corporation approved the transaction; where related party transactions were retrospectively ratified, the Board or Audit Committee failed to document in writing the nature of the violation and the basis for the board's or committee's ratification of the transaction and failed to put into place procedures to ensure that the corporation complies with legal requirements pertaining to related party transactions moving forward. Further, the directors, officers and key persons who had an interest in the related party transactions failed to disclose the material facts concerning the same in good faith to the board, or an authorized committee thereof. Conflict of interest and related party transactions under N-PCL §§ 102(a)(24), 715, 715-a, EPTL § 8-1.9 and the NRA's relevant policies include the NRA's transactions with Wayne LaPierre; Wilson Phillips; Joshua Powell; John Frazer; Marion Hammer;

David Keene; Dave Butz; Lance Olson; Sandra Froman; Michael Marcellin; Kyle Weaver; Wayne Sheets; Bart Skelton; Scott Bach; Robert Dowlut; Colleen Gallagher; Susan LaPierre; Douglas Hamlin; Tom King; Edward J. Land, Jr.; Carolyn Meadows; Oliver North; Ted Nugent; Shemane Nugent; James W. Porter II; Kayne Robinson; Mercedes V. Schlapp; Tyler Schropp; Tom Selleck; Robert Marcario; and McKenna & Associates.

Contention Interrogatory No. 4

Set forth all factual and legal bases for every allegation in the Second Amended Complaint.

RESPONSE TO CONTENTION INTERROGATORY NO. 4:

Plaintiff incorporates the General Objections stated above as if fully stated herein. In particular, without limitation, Plaintiff objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and concerns summary statements that are supported by particular factual allegations in the Second Amended Complaint. This Interrogatory is also overly broad and unduly burdensome insofar as it seeks repetitive recitation of the record and to the extent it seeks information that is readily and equally accessible to Defendant NRA from transcripts of depositions and testimony given by current or former NRA directors, officers, and employees and documents that Defendants produced to Plaintiff. Plaintiff further objects to this Interrogatory as overbroad and unduly burdensome to the extent it calls for Plaintiff to reproduce, in narrative answer format, material from the testimony of current or former NRA directors, officers, and employees and documents that Defendants and third parties produced to Plaintiff that has already been produced to Defendants. Plaintiff further objects to the extent that the Interrogatory seeks information protected by the attorney work product privilege, trial preparation privilege and/or calls for the mental impressions of counsel. Notwithstanding the foregoing objections and without waiver of the same, Plaintiff

incorporates by reference the particularized allegations in the 704 paragraphs of the Second Amended Complaint, the evidentiary record, the responses to other Interrogatories herein, and the Plaintiff's Expert Reports..

Contention Interrogatory No. 5

For each alleged omission or action, including any action to conceal, by any individual that you contend must be imputed to the NRA for purposes of determining the NRA's liability in the Action, identify with particularity any legal bases and all facts or evidence on which you base your contention.

RESPONSE TO CONTENTION INTERROGATORY NO.5:

Plaintiff incorporates the General Objections stated above as if fully stated herein. In particular, without limitation, Plaintiff objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and concerns summary statements that are supported by particular factual allegations in the Second Amended Complaint. This Interrogatory is also overly broad and unduly burdensome insofar as it seeks repetitive recitation of the record and to the extent it seeks information that is readily and equally accessible to Defendant NRA from transcripts of depositions and testimony given by current or former NRA directors, officers, and employees and documents that Defendants produced to Plaintiff. Plaintiff further objects to this Interrogatory as overbroad and unduly burdensome to the extent it calls for Plaintiff to reproduce, in narrative answer format, material from the testimony of current or former NRA directors, officers, and employees and documents that Defendants and third parties produced to Plaintiff that has already been produced to Defendants. Plaintiff further objects to the extent that the Interrogatory seeks information protected by the attorney work product privilege, trial preparation privilege and/or calls for the mental impressions of counsel. Notwithstanding the foregoing objections and without waiver of the same, Plaintiff incorporates by reference the allegations in the Second Amended Complaint, the evidentiary record,

the responses to other Interrogatories herein, and the Plaintiff's Expert Reports and states that the NRA, acting through its fiduciaries, trustees, officers, directors, *de facto* directors and officers and employees, including, but not limited to, the Individual Defendants, was on notice of and failed to supervise or take appropriate disciplinary action against the Individual Defendants and others for the actions alleged herein, resulting in the improper administration of and waste of the NRA's charitable assets, violation or evasion of the NRA's bylaws, policies, procedures and internal controls; made material false statements in its filings with the Attorney General; failed to comply with the applicable law governing conflicts of interest, related-party transactions and self-dealing; failed to comply with the applicable law governing whistleblower protections; and permitted violations of the NRA's bylaws and internal policies and procedures.

Contention Interrogatory No. 6

For each request for relief you seek in the Prayer for Relief section of the Second Amended Verified Complaint (NYSCEF 646) *as against the NRA*, state the legal basis or bases for and all facts or evidence on which you base your request.

RESPONSE TO CONTENTION INTERROGATORY NO. 6:

Plaintiff incorporates the General Objections stated above as if fully stated herein. In particular, without limitation, Plaintiff objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and concerns summary statements that are supported by particular factual allegations in the Second Amended Complaint. This Interrogatory is also overly broad and unduly burdensome insofar as it seeks repetitive recitation of the record and to the extent it seeks information that is readily and equally accessible to Defendant NRA from transcripts of depositions and testimony given by current or former NRA directors, officers, and employees and documents that Defendants produced to Plaintiff. Plaintiff further objects to this Interrogatory as overbroad and unduly

burdensome to the extent it calls for Plaintiff to reproduce, in narrative answer format, material from the testimony of current or former NRA directors, officers, and employees and documents that Defendants and third parties produced to Plaintiff that has already been produced to Defendants. Plaintiff further objects to the extent that the Interrogatory seeks information protected by the attorney work product privilege, trial preparation privilege and/or calls for the mental impressions of counsel. Notwithstanding the foregoing objections and without waiver of the same, Plaintiff incorporates by reference the allegations in the Second Amended Complaint, the evidentiary record, the responses to other Interrogatories herein, and the Plaintiff's Expert Reports. With respect to the Prayer for Relief section of the Second Amended complaint, to the extent that Plaintiff asserts claims in equity and seeks an equitable accounting, the amount of restitution and damages due and owing by Defendant NRA, will be determined at trial, no additional computation of damages or other information sought in the Interrogatory can be provided at this time.

Contention Interrogatory No. 7

For any member of the NRA's Board of Directors, including but not limited to those referenced in the Second Amended Verified Complaint, who you contend breached or failed to discharge his or her duties to the NRA, state legal basis or bases for and all facts or evidence on which you base this contention.

RESPONSE TO CONTENTION INTERROGATORY NO. 7:

Plaintiff incorporates the General Objections stated above as if fully stated herein. In particular, without limitation, Plaintiff objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and concerns summary statements that are supported by particular factual allegations in the Second Amended Complaint. This Interrogatory is also overly broad and unduly burdensome insofar as it seeks repetitive recitation of the record and to the extent it seeks information that is

readily and equally accessible to Defendant NRA from transcripts of depositions and testimony given by witnesses including current or former NRA directors, officers, and employees and documents that Defendant NRA possesses. Plaintiff further objects to this Interrogatory as overbroad and unduly burdensome to the extent it calls for Plaintiff to reproduce, in narrative answer format, material from the testimony of witnesses including current or former NRA directors, officers, and employees and documents that Defendants and third parties produced to Plaintiff that have already been produced to Defendants. Plaintiff further objects to the extent that the Interrogatory seeks information protected by the attorney work product privilege, trial preparation privilege and/or calls for the mental impressions of counsel. Notwithstanding the foregoing objections and without waiver of the same, Plaintiff incorporates by reference the allegations in the Second Amended Complaint, the evidentiary record, the responses to other Interrogatories herein including those previously served upon Defendant NRA, and the Plaintiff's Expert Reports and states that the NRA board failed to comply with its duties of loyalty, care, and obedience to the NRA's mission. This includes, but is not limited to, members of the Audit Committee during the relevant period, Charles Cotton, David Coy, Willes Lee, Carolyn Meadows, and Joel Friedman, who each failed in their duties to act in the best interests of the NRA, to ensure the proper administration of the NRA's charitable assets and to put into place sufficient policies, procedures and internal controls and to implement and enforce such policies, procedures and internal controls in order to prevent misuse, diversion, and waste of the NRA's charitable assets. In addition, the NRA Board failed to prevent, investigate or take timely curative action for violations of the NRA's policies, procedures and internal controls and New York law, including in regard to related party transactions, conflicts of interest, violations of whistleblower protections, procurement policies, purchasing

policies, and contracting policies. The Board also failed in its obligations to the NRA to exercise independent oversight of the NRA management and instead facilitated, ratified or acquiesced to improper conduct by, among others, the Individual Defendants. The NRA Board failed to take steps to ensure the accuracy of the NRA's 990 filings, to correct inaccuracies or to timely complete investigations to ensure complete and accurate disclosures and to permit appropriate review of the completed 990s by the Board. In addition, these directors, and others, failed to prevent and assisted Defendant LaPierre in placing the NRA in bankruptcy without approval of the full Board, without compliance with policies and internal controls as further developed in the Second Amended Complaint and the evidentiary record.

Contention Interrogatory No. 8

For each instance where the Second Amended Complaint asserts a general allegation and provides merely a non-exhaustive/illustrative list of specific instances of alleged misconduct (e.g., Second Amended Complaint Paragraphs 155, 695), identify all other specific instances that you contend occurred or exist but that are not identified in the Second Amended Complaint.

RESPONSE TO CONTENTION INTERROGATORY NO. 8:

Plaintiff incorporates the General Objections stated above as if fully stated herein. In particular, without limitation, Plaintiff objects to this Interrogatory as exceeding the numerical limitation on Interrogatories in the Commercial Division Rules, and on the grounds that it is overbroad, unduly burdensome, and concerns summary statements that are supported by particular factual allegations in the Second Amended Complaint. This Interrogatory is also overly broad and unduly burdensome insofar as it seeks repetitive recitation of the record and to the extent it seeks information that is readily and equally accessible to Defendant NRA from transcripts of depositions and testimony given by witnesses including current or former NRA directors, officers, and employees and documents that

Defendants possess. Plaintiff further objects to this Interrogatory as overbroad and unduly burdensome to the extent it calls for Plaintiff to reproduce, in narrative answer format, material from the testimony of witnesses including current or former NRA directors, officers, and employees and documents that Defendants and third parties produced to Plaintiff that have already been produced to Defendants. Plaintiff further objects to the extent that the Interrogatory seeks information protected by the attorney work product privilege, trial preparation privilege and/or calls for the mental impressions of counsel and to the extent it asks Plaintiff's counsel to identify all instances where in Defendant NRA would like more information. Notwithstanding the foregoing objections and without waiver of the same, Plaintiff incorporates by reference the allegations in the Second Amended Complaint, the evidentiary record, and the responses to other Interrogatories herein, and the Plaintiff's Expert Reports. Plaintiff further states that Paragraph 155 of the Second Amended Complaint contains an example of an instance where LaPierre directed private aircraft to make additional stops in Nebraska to pick up or drop off family members, at the NRA's expense as alleged in detail in the Second Amended Complaint. The evidentiary record in this case contains evidence of other such trips, paid for by the NRA and within the knowledge of the NRA. Paragraph 695 of the Second Amended Complaint alleges that the NRA entered into numerous unlawful related party transactions in violation of N-PCL § 715 and EPTL § 8-1.9, including those detailed within the 704 paragraph Second Amended Complaint. Additionally such related party transactions are detailed in the records of the NRA produced in this action and evident from the evidentiary record in this action. Finally, Plaintiff specifically refers Defendant NRA to the answer provided in response to Contention Interrogatory No. 1 for a description of related party transactions that violated law and NRA Relevant policies.

Dated: New York, New York
November 22, 2022

LETITIA JAMES
Attorney General of the State of New York
Attorney for Plaintiff

By: /s/ William Wang
WILLIAM WANG
Assistant Attorney General
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New York, New York 10005
Telephone: (212) 416-6026
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VERIFICATION

State of New York)
) ss:
 County of New York)

William Wang, an attorney duly licensed to practice law in the Courts of the State of New York, hereby affirms the following under penalties of perjury:

1. I am an Assistant Attorney General in the New York State Office of the Attorney General (“OAG”).
2. I have read the foregoing **RESPONSES AND OBJECTIONS OF PLAINTIFF THE PEOPLE OF THE STATE OF NEW YORK TO DEFENDANT NRA’S CONTENTION INTERROGATORIES**, dated November 22, 2022, and am knowledgeable about the contents thereof based upon the OAG’s investigation of the National Rifle Association of America (“NRA”) and related individuals, the investigative and regulatory materials contained in the files of the OAG, information obtained in discovery in this action and proceedings relating to the NRA’s failed petition for bankruptcy, *In re National Rifle Association of America and Sea Girt LLP*, in the Northern District of Texas. To my knowledge, based on such information, the foregoing responses and objections are true, except as to those matters stated upon information and belief, and as to those, I believe them to be true.

Dated: November 22, 2022

/s/ William Wang
 WILLIAM WANG