

Mot. Seq. No. \_\_

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  
WILLIAM WANG IN SUPPORT  
OF PLAINTIFF'S MOTION TO  
EXCLUDE OPINIONS OF  
DEFENDANTS'  
COMPENSATION AND  
SECURITY WITNESSES**

William Wang, 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 support of Plaintiff's Motion to Exclude Defendants' Compensation and Security Expert Opinions, which seeks to exclude the opinions of Alan Nadel, Michael Graham, James Reda, and J. Lawrence Cunningham, who Defendants the National Rifle Association of America, Wayne LaPierre, and John Frazer have proffered as expert witnesses to testify at trial.

3. Attached as Exhibit A is a true and correct copy of the Expert Report of Alan A. Nadel CFF, dated September 16, 2022 ("Nadel Report").

4. Attached as Exhibit B is a true and correct copy of Defendant Wayne LaPierre's Disclosure Pursuant to CPLR 3101(d) and Commercial Division Rule 13 for Michael Dennis

Graham and Mark Rambin, dated September 16, 2022, and the Expert Report of Michael Graham (“Graham Report”)(marked as Exhibit A to the Disclosure), dated September 16, 2022. Because the expert report of Mark Rambin is not addressed in this motion, it is not included in this Exhibit.

5. Attached as Exhibit C is a true and correct copy of the Expert Report of James F. Reda, dated September 16, 2022 (“Reda Report”).

6. Attached as Exhibit D is a true and correct copy of the deposition transcript of Alan Nadel, dated October 24, 2022 (“Nadel Dep.”).

7. Attached as Exhibit E is a true and correct copy of the Expert Report of Eric Hines, dated September 16, 2022 (“Hines Report”).

8. Attached as Exhibit F is a true and correct copy of the deposition transcript of Gayle Stanford, dated February 28, 2022 (“Stanford Dep.”).

9. Attached as Exhibit G is a true and correct copy of the deposition transcript of Wayne LaPierre, dated June 27, 2022 (“LaPierre Dep. Day 1”).

10. Attached as Exhibit H is a true and correct copy of the deposition transcript of Wayne LaPierre, dated March 22, 2021 (“LaPierre Bankruptcy Deposition”).

11. Attached as Exhibit I is a true and correct copy of the NRA’s Travel and Business Expense Reimbursement Policy, NRA-NYAGCOMMDIV-00092307.

12. Attached as Exhibit J is a true and correct copy of the Expert Report of J. Lawrence Cunningham, dated September 16, 2022 (“Cunningham Report”).

13. Attached as Exhibit K is a true and correct copy of the Rebuttal Expert Report of J. Lawrence Cunningham, dated October 7, 2022 (“Cunningham Rebuttal Report”).

14. Attached as Exhibit L is a true and correct copy of the deposition transcript of J. Lawrence Cunningham, dated November 10, 2022 (“Cunningham Dep.”).

Dated: New York, New York  
March 24, 2023

*/s William Wang*

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William Wang