

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

**REPLY AFFIRMATION OF
STEVEN SHIFFMAN
IN FURTHER SUPPORT OF
PLAINTIFF'S MOTION TO
DISMISS CERTAIN OF
DEFENDANTS'
AFFIRMATIVE DEFENSES
AND IN OPPOSITION TO
THE CROSS-MOTIONS**

Steven Shiffman, 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 and Senior Counsel 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 further support of Plaintiff's motion to dismiss certain of Defendants' affirmative defenses and in opposition cross-motions for leave to amend made by Defendants LaPierre and Frazer.

3. Attached hereto as Ex. A is the affirmation of Alan Futerfas, dated August 30, 2018, submitted in support of Respondents' motion to dismiss in *People by Underwood v. Trump*, 62 Misc.3d 500 (Sup. Ct. N.Y. Cty. 2018), without exhibits.

4. Attached hereto as Ex. B are Defendant John Frazer's Responses, dated November 22, 2022 to Plaintiff's contention interrogatories.

5. Attached hereto as Ex. C are Defendant Wayne LaPierre's responses, dated November 22, 2022, to Plaintiff's contention interrogatories.

Dated: New York, New York
April 3, 2023



Steven Shiffman