

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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PEOPLE OF THE STATE OF NEW YORK, BY	:	
LETITIA JAMES, ATTORNEY GENERAL OF	:	
THE STATE OF NEW YORK,	:	Index No. 451625/2020
	:	
Plaintiff,	:	
	:	DEFENDANT JOHN FRAZER'S
v.	:	FIRST INTERROGATORIES
	:	SEEKING THE CLAIMS AND
THE NATIONAL RIFLE ASSOCIATION OF	:	CONTENTIONS OF PLAINTIFF
AMERICA, INC., WAYNE LAPIERRE,	:	
WILSON PHILLIPS, JOHN FRAZER, and	:	
JOSHUA POWELL,	:	
	:	
Defendants.	:	
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PLEASE TAKE NOTICE that, pursuant to Article 31 of the New York Civil Practice Law and Rules ("CPLR") and Commercial Division Rule 11-a(d), defendant John Frazer ("Frazer") by and through his undersigned counsel, hereby demands that the Office of the Attorney General of the State of New York ("Plaintiff" or "OAG") provide responses to the interrogatories furnished below, at the offices of Gage Spencer & Fleming LLP, 410 Park Avenue, Suite 810, New York, New York 10022, within twenty (20) days of service of this request.

Definitions

1. "Frazer" shall mean Defendant John Frazer.
2. "Plaintiff," "OAG," "you," or "your" shall mean Plaintiff the Attorney General of the State of New York and its agents, employees, and representatives.
3. "NRA" shall mean the National Rifle Association of America, Inc.
4. "CHAR500" shall refer to the annual reports filed with the Charities Bureau of the OAG by the NRA.

5. “Complaint” shall mean the Second Amended Verified Complaint filed on May 2, 2022, in the Supreme Court of the State of New York captioned *People of the State of New York, by Letitia James, Attorney General of the State of New York v. The National Rifle Association of America Inc., Wayne LaPierre, Wilson Phillips, John Frazer and Joshua Powell*, Case No. 451625/2020.

6. “Document” shall refer to each and every form of recording any form of communication or representation upon any tangible thing, including every form of recording letters, words, pictures, sounds, or symbols, or combinations thereof by means such as handwriting, printing, photostat, photographing, magnetic taping or writing, optically burning or encoding, or any other form of storing, compiling, or mechanically or electrically recording data onto any media including paper, film, plastic, magnetic tape, computer disks, compact discs (CDs), digital video discs (DVDs) and the like. For example, the term “Document” includes without limitation, correspondence, memoranda, notes, diaries, minutes, statistics, letters, telegrams, contracts, reports, studies, checks, statements, tags, labels, invoices, brochures, periodicals; receipts, returns, summaries, pamphlets, books, notebooks, lab notebooks, invention disclosures, prospectuses, interoffice and intra-office communications, offers, notations of any sort of conversations, working papers, applications, permits, surveys, indices, telephone calls, meetings, printouts, teletypes, telefax, telefax records, invoices, work sheets, graphic or oral representations of any kind (including, without limitation, electronic mail or e-mail, Instant Messages, tapes, cassettes, discs, and recordings), and shall include all formats including, without limitation, formats such as Blu-Ray, HD-DVD, USB Drive, Zip Drive, Flash Drive, and Cloud (or similar) based storage, including, but not limited to, Dropbox, iCloud, Google Drive, and Microsoft OneDrive.

7. “Communication” shall mean the transmittal of information in any format, including electronically stored information.

8. “Relate to” and “relating to” shall mean concerning, consisting of, commenting upon, referring to, pertaining to, evidencing, describing, or in any way logically or factually connected with the matter discussed.

9. “All,” “any,” “each” and “every” shall be construed as encompassing any and all.

10. “And” or “or” shall be construed conjunctively or disjunctively as necessary to make the requests inclusive rather than exclusive.

11. “Identify” shall mean to state, enumerate, and/or reveal fully, and provide a statement of:

- a. in the case of a communication, its date, type, the place where it occurred, the identity of the person who made the communication, the identity of the person who received the communication, the identity of each other person when it was made, and the subject matter discussed;
- b. in the case of a document, the title of the document, the author, the title or position of the author, the addressee, each recipient, the type of document, the subject matter, the date of preparation, and its number of pages;
- c. in the case of a natural person, his or her name, business address and telephone number, employer, and title or position;
- d. in the case of an agreement, its date, the place where it occurred, the identity of all persons who were parties to the agreement, the identity of each person who has knowledge of the agreement and all other persons present when it was made, and the subject matter of the agreement.

12. “Information” shall mean facts or knowledge relied upon or influencing your responses.

13. “Request” or “Requests” shall refer to the particular interrogatories furnished below.

Instructions

1. These Requests hereby incorporate by reference all applicable instructions set forth in CPLR 3133.

2. Please precede each answer with the Request to which it is addressed.

3. If you object to any Request, answer all portions of the Request to which your objection does not relate; and state your objection and the reasons therefor as to the portion to which you object.

4. Each Request is to be answered fully based on all information within the knowledge, possession, custody or control of Plaintiff, including Plaintiff’s attorney or agents, and other persons acting on his behalf.

5. Unless otherwise stated, the time period covered by these Requests is January 1, 2015 up to and including the date on which the Requests are answered.

6. If any information responsive to these Requests is located or is within the possession, custody, or control of Plaintiff, Frazer requests that it be disclosed.

7. If Plaintiff withholds any information responsive to any of the Requests on the grounds of privilege or that it believes it to be otherwise excludable discovery, identify the information, describe its subject matter, and specify the basis for the claimed privilege or other grounds for exclusion.

INTERROGATORIES

INTERROGATORY NO. 1: Identify with particularity the facts supporting your contention, if it is your contention, that Frazer was handpicked to facilitate misuse of charitable assets and that Frazer ignored, overrode, or otherwise violated the bylaws and internal policies and procedures he was charged with enforcing, as alleged in Paragraph 5 of the Complaint.

INTERROGATORY NO. 2: Identify with particularity the facts supporting your contention, if it is your contention, that Frazer assisted Wayne LaPierre to obtain personal benefits and unidentified board members to obtain undisclosed or unapproved payments, as alleged in Paragraphs 9 and 10 of the Complaint.

INTERROGATORY NO. 3: Identify with particularity the facts supporting your contention, if it is your contention, that Frazer instituted a culture of self-dealing, mismanagement, and negligent oversight at the NRA, and that he overrode or evaded internal controls to allow himself, his family, favored board members, employees and vendors to benefit through reimbursed expenses, related party transactions, excess compensation, side deals, or waste of charitable assets without regard to the NRA's best interests, as alleged in Paragraph 142 of the Complaint.

INTERROGATORY NO. 4: Identify with particularity the facts supporting your contention, if it is your contention, that Frazer failed to make, or failed to advise the NRA's officers and directors to make, "necessary" changes to the NRA's governance procedures as alleged in Paragraph 293 of the Complaint.

INTERROGATORY NO. 5: Identify with particularity the facts supporting your contention, if it is your contention, that Frazer’s official conduct included “neglect of, or failure to perform, or other violation of his duties in the management and disposition of corporate assets committed to his charge,” as required by N-PCL § 720(a)(1)(A).

INTERROGATORY NO. 6: Identify with particularity the facts supporting your contention, if it is your contention, that Frazer’s official conduct included “acquisition by himself, transfer to others, loss or waste of corporate assets due to any neglect of, or failure to perform, or other violation of his duties,” as required by N-PCL § 720(a)(1)(B).

INTERROGATORY NO. 7: Identify with particularity the facts supporting your contention, if it is your contention, that there is a will, trust, other instrument or appointment, court appointment, law, or any other particular facts establishing that Frazer is a statutory trustee, as alleged in Paragraph 31 of the Complaint.

INTERROGATORY NO. 8: Identify with particularity the facts supporting your contention, if it is your contention, that Frazer actually held and administered property for charitable purposes, as required in EPTL § 8-1.4(a) including, without limitation, the particular property so held and administered.

INTERROGATORY NO. 9: Identify with particularity the property you contend Frazer was “responsible for” holding and administering, as alleged in Paragraph 668 of the Complaint.

INTERROGATORY NO. 10: Identify with particularity the facts supporting your contention, if it is your contention, that Frazer has, since 2015, solicited or collected funds or property, or done any act in furtherance thereof, for or on behalf of the NRA.

INTERROGATORY NO. 11: Identify with particularity the facts supporting your contention, if it is your contention, that Frazer was aware of “false and misleading statements and omissions in the annual reports the [NRA] filed with the Attorney General,” as alleged in Paragraph 703 of the Complaint including, without limitation, the particular statements and omissions which you contend he was aware.

INTERROGATORY NO. 12: Identify with particularity the facts supporting your contention, if it is your contention, that Frazer failed to enforce compliance with the NRA’s Conflict of Interest Policy, and failed to maintain, enforce, and ensure compliance with, laws and policies governing whistleblowers, as alleged in Paragraphs 8 and 293 of the Complaint.

INTERROGATORY NO. 13: Identify with particularity each and every business transaction the NRA was a party to with current or former officers, directors, relatives thereof or entities affiliated therewith which you contend the NRA falsely reported and/or failed to disclose on its Form 990 for each year 2015-2018, as alleged in Paragraph 567(a)(ii) of the Complaint.

INTERROGATORY NO. 14: Identify with particularity the facts supporting your contention, if it is your contention, that board members engaged in business transactions with the NRA before 2017 which rendered them not independent, as alleged in Paragraph 567(a)(iii) of the Complaint.

INTERROGATORY NO. 15: Identify with particularity the facts supporting your contention, if it is your contention, that the NRA made false statements in its Form 990s for the years 2015-2018 about its process for determining the compensation of officers and directors, as alleged in Paragraph 567(b)(vii) of the Complaint.

INTERROGATORY NO. 16: Identify with particularity the facts supporting your contention, if it is your contention, that Frazer has continued in a course of misconduct since August 6, 2020, as alleged in Paragraph 568 of the Complaint.

INTERROGATORY NO. 17: Identify with particularity the facts supporting your contention, if it is your contention, that NRA employees did not receive meaningful training on compliance with the NRA's conflicts of interest or whistleblower policies and procedures and that Frazer was "ill equipped" to provide that training, as alleged in Paragraph 555 of the Complaint.

INTERROGATORY NO. 18: Identify with particularity the basis for your contention, if it is your contention, that Frazer can be removed from his position as General Counsel, as demanded in the Prayer for Relief, ¶ E of the Complaint.

INTERROGATORY NO. 19: Identify with particularity the facts supporting your contention, if it is your contention, that a copy of an instrument providing for Frazer's title, powers and duties has been filed with the Attorney General as mandated by EPTL § 8-1.4 (d) at any time since January 2015.

INTERROGATORY NO. 20: Identify with particularity the facts supporting your contention, if it is your contention, that the Attorney General has provided Frazer with notice of failure to comply with EPTL § 8-1.4 (d), (f), or (g) as set forth by EPTL § 8-1.4(r).

INTERROGATORY NO. 21: Identify with particularity the facts supporting your contention, if it is your contention, that Frazer has, since 2015, been engaged in the solicitation or collection of funds or property, or doing any acts in furtherance thereof, for or on behalf of the NRA.

INTERROGATORY NO. 22: Identify with particularity your definition of “charitable assets” which you contend the NRA is responsible for managing, and the specific “charitable assets” which you contend Frazer managed, disposed of, and/or administered, as alleged, *inter alia*, in Paragraphs 75, 653, and 669 of the Complaint.

Dated: New York, New York
July 15, 2022

By: /s/ William B. Fleming

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Counsel for Defendant John Frazer

CERTIFICATE OF SERVICE

I hereby certify that, on July 15, 2022, a true and correct copy of the foregoing document was electronically served by email on all counsel of record.

By: /s/ William B. Fleming