

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, WAYNE LAPIERRE, WILSON  
PHILLIPS, JOHN FRAZER, and JOSHUA  
POWELL,

Defendants.

Index No. 451625/2020

Motion Sequence Nos. 50, 52, 54

**AFFIRMATION OF  
STEPHEN THOMPSON IN  
SUPPORT OF PLAINTIFF'S  
OPPOSITION TO  
DEFENDANTS' MOTIONS  
TO EXCLUDE THE  
TESTIMONY OF EXPERT  
JEFFREY TENENBAUM**

Stephen Thompson, an attorney duly admitted to practice before the Courts of this State, hereby affirms the following under the penalty of perjury pursuant to Civil Practice Law and Rules 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 consolidated opposition to Defendants' motions to exclude the testimony of expert Jeffrey Tenenbaum, Mot. Seq. Nos. 50, 52, 54.
3. I am familiar with the facts and circumstances set forth in this affirmation, which are based upon my personal knowledge and information contained in the files of the OAG.
4. Attached as **Exhibit A** to this affirmation is a true and correct copy of the Rebuttal Report of Jeffrey S. Tenenbaum, dated October 7, 2022.

5. Attached as **Exhibit B** to this affirmation is a true and correct copy of an excerpt of the July 12, 2022 deposition of John Frazer in this action.

6. Pursuant to paragraph 14 of the So Ordered Stipulation and Order for the Production and Exchange of Confidential Information filed October 25, 2022 (NYSCEF 869), Exhibits A and B attached to this affirmation will be filed in sealed form, and will be replaced with their corresponding unredacted versions absent a timely motion to seal.

Dated: New York, New York  
May 5, 2023

/s/ Stephen Thompson  
Stephen Thompson

**Attorney Certification Pursuant to Commercial Division Rule 17**

I, Stephen Thompson, an attorney duly admitted to practice law before the courts of the State of New York, certify that the Affirmation of Stephen Thompson in Support of Plaintiff's Opposition to Defendants' Motions to Exclude the Testimony of Expert Jeffrey Tenenbaum complies with the word count limit set forth in Rule 17 of the Commercial Division of the Supreme Court (22 NYCRR 202.70(g)) because the affirmation contains 436 words, excluding the parts exempted by Rule 17. In preparing this certification, I have relied on the word count of the word-processing system used to prepare this affirmation.

Dated: New York, New York  
May 5, 2023

/s/ Stephen Thompson  
Stephen Thompson