

EXHIBIT 3

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

-----X
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.
-----X

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: Index No. 451625/2020
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:
: Hon. Joel M. Cohen
: IAS Part 3
:
: SUPPLEMENTAL
: DISCLOSURE PURSUANT
: TO CPLR 3101(d) AND
: COMMERCIAL DIVISION
: RULE 13
:
:

Pursuant to CPLR 3101(d) and Commercial Division Rule 13, Defendant Wayne LaPierre (“Mr. LaPierre”), by his attorney, makes the following supplemental disclosure:

MICHAEL DENNIS GRAHAM

As previously disclosed, Mr. LaPierre expects to call Michael Dennis Graham, M.B.A., a Consultant with Grahall, LLC, as an expert witness at trial. A copy of his supplemental expert report is attached hereto as Exhibit A.

Dated: New York, New York
October 6, 2022

Respectfully submitted,

/s/ P. Kent Correll
P. Kent Correll
Correll Law Group
250 Park Avenue, 7th Floor
New York, New York 10177
(212) 475-3070

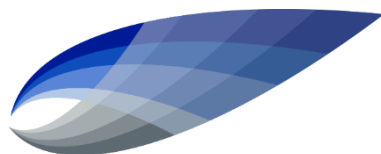
Attorney for Defendant Wayne LaPierre

Attachment

To: All Counsel of Record (via E-Mail)

EXHIBIT A

Grahall, LLC Supplemental Expert Report



GRAHALL

Supplemental Expert Report

Michael Dennis Graham

Michael Dennis Graham

Consultant Grahall, LLC

October 6, 2022

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Supplemental Report on Reasonable Compensation for CEO/Executive Vice President NRA

Since I submitted my report, I have received additional information that bears on the issue of whether the compensation paid by the NRA to Mr. LaPierre was reasonable. Based on that information, I performed additional analysis. I subtracted from the listed compensation for Mr. LaPierre the one time amount of \$3,463,368 i.e., the amount of his distribution at age 65 from the 457(f) deferred compensation plan which reflected contributions and appreciation since March 1, 2006, the plan's effective date. Then I added back into the compensation for that year the actual value of the annual contribution of \$18,000 for Mr. LaPierre.

This shows that his compensation was even farther below the 50th percentile than I showed in my report, further supporting the conclusion that his compensation was reasonable.

Reasonable Compensation Amount**(Revised to take into account 457(f) Deferred Compensation Plan)**

Year	Actual Compensation	Competitive/Reasonable	Difference
2021	\$1,076,750	\$2,600,000	\$1,523,250
2020	\$1,665,267	\$2,540,000	\$874,733
2019	\$1,885,000	\$2,450,000	\$565,000
2018	\$2,224,436	\$2,380,000	\$155,564
2017	\$1,433,977	\$2,310,000	\$876,023
2016	\$1,422,339	\$2,242,718	\$820,379
2015	\$1,665,617	\$2,177,397	\$511,780
Total	\$11,373,386	\$16,700,115	\$5,326,729