

## EXHIBIT C

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, :	
:	
v. :	<b>DEFENDANT JOHN FRAZER'S</b>
:	<b>SECOND INTERROGATORIES</b>
:	<b>SEEKING THE CLAIMS AND</b>
THE NATIONAL RIFLE ASSOCIATION OF :	<b>CONTENTIONS OF PLAINTIFF</b>
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.
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. 23:** With respect to your Complaint's Fifteenth Cause of Action, identify with particularity each alleged statement that you contend was material and untrue and each omission that you contend is actionable under Executive Law 172-d(1) and 175(2)(d), and the legal basis or bases for such a contention.

**INTERROGATORY NO. 24:** With respect to your Fifteenth Cause of Action, for each alleged misstatement or omission that you contend gives rise to liability, identify each individual or entity who or which you contend detrimentally relied thereon, the facts supporting your contention that each detrimentally relied, or, if it is your contention that you are not required to prove reliance, the legal basis or bases for that contention.

**INTERROGATORY NO. 25:** With respect to your Complaint's Fifteenth Cause of Action, identify with particularity the facts supporting your contention, if it is your contention, that an individual who signed the NRA's CHAR500 filings "negligently failed to learn" that the filings were not true, correct, and complete as alleged in Paragraph 295 of the Complaint, and the legal basis or bases for your contention that you are entitled to relief for such negligence.

Dated: New York, New York  
October 19, 2022

By:           /s/ William B. Fleming          

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