

EXHIBIT C

From: [Svetlana Eisenberg](#)
To: [Connell, Monica](#)
Cc: [Stern, Emily](#)
Subject: Re: Frenkel report and related documents
Date: Thursday, October 27, 2022 6:44:58 AM
Attachments: [image001.png](#)

Monica,

Thank you for the confirmation.

The requested additional documents are not covered by the order. The NRA, however, agrees to produce readily available non-privileged records falling in these categories and to prepare a privilege log for responsive but privileged documents.

Regards,

Svetlana

Svetlana M. Eisenberg | Partner
Brewer, Attorneys & Counselors
750 Lexington Avenue, 14th Floor
New York, New York 10022
Office Direct: 212.224.8817
Office Main: 212.489.1400
Cell: 929.319.1731
Fax: 212.751.2849
sme@brewerattorneys.com www.brewerattorneys.com

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From: Connell, Monica <Monica.Connell@ag.ny.gov>
Sent: Tuesday, October 25, 2022 3:26 PM
To: Svetlana Eisenberg <sme@brewerattorneys.com>
Cc: Stern, Emily <Emily.Stern@ag.ny.gov>
Subject: RE: Frenkel report and related documents

Svetlana,

We will agree to the highly confidential treatment of the Frenkel report.

In regard to the documents we seek, you are correct that they are as listed in Yael's email, including the Letter received by NRA board members (which the NRA already produced, I believe, unless there is another one); any board minutes or reports relating to the Letter; communications relating to the Letter; documents consisting of or relating to any response to the Letter; and the Frenkel report.

Monica

From: Svetlana Eisenberg <sme@brewerattorneys.com>

Sent: Tuesday, October 25, 2022 1:35 PM

To: Connell, Monica <Monica.Connell@ag.ny.gov>

Cc: Stern, Emily <Emily.Stern@ag.ny.gov>

Subject: Re: Frenkel report and related documents

[EXTERNAL]

Monica,

The NRA will appeal Judge Sherwood's ruling on the call earlier today.

In the meantime, in the interest of trying to accommodate the NYAG's request, the NRA will agree to produce the Frenkel report to the NYAG today under the Highly Confidential designation, if the NYAG agrees to the below.

1. You will segregate and clearly mark it as Highly Confidential.
2. If the NRA prevails on appeal, you agree to (i) return the document immediately; and (ii) not use any work product or transcripts that refer to its contents;
3. If OAG uses the document in the upcoming expert depositions, OAG will on the record highlight its intention to use the document and the protections that apply to it;
4. The parties can specially mark the portions of the transcripts containing questioning based upon the document;
5. Transcripts reflecting contents of the document will be filed under seal (i.e., redacted to the extent they reveal its contents); and
6. All protections applicable to confidential documents under the PO stipulation apply in addition to the obligations listed above.

Please advise of your position.

Separately, I will revert today regarding your second question. In the meantime, can you please confirm that your reference below to the "other outstanding documents as per the Special Master's July 15th order and Justice Cohen's October 17th order" is to the list in Yael Fuchs's email message dated June 21, 2022 (which was attached as Exhibit E to OAG's July 6, 2022 application to Judge Sherwood), not to language in the judges' orders?

7. Regards,

8. Svetlana

Svetlana M. Eisenberg | Partner
Brewer, Attorneys & Counselors
750 Lexington Avenue, 14th Floor
New York, New York 10022
Office Direct: 212.224.8817
Office Main: 212.489.1400
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Fax: 212.751.2849

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From: Connell, Monica <Monica.Connell@ag.ny.gov>

Sent: Tuesday, October 25, 2022 1:15 PM

To: Svetlana Eisenberg <sme@brewerattorneys.com>

Cc: Stern, Emily <Emily.Stern@ag.ny.gov>

Subject: Frenkel report and related documents

Svetlana,

Can you please confirm that the NRA will produce the Frenkel report today. In addition, please confirm that the NRA will produce the other outstanding documents as per the Special Master's July 15th order and Justice Cohen's October 17th order.

Thanks,

Monica



Monica Connell
Senior Litigation Counsel
New York State Office of the Attorney General
28 Liberty Street, 19th Floor | New York, NY 10005
Tel: (212) 416-8965 | Monica.Connell@ag.ny.gov

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From: [Fuchs, Yael](#)
To: [Svetlana Eisenberg](#); [Sarah Rogers](#)
Cc: [Connell, Monica](#); [Stern, Emily](#)
Subject: NRA- Additional Documents
Date: Tuesday, June 21, 2022 2:15:06 PM
Attachments: [06 NRA-NYAG-COMMDIV-00686689.pdf](#)

Svetlana, Sarah:

As you are aware, the deposition of NRA board member and Audit Committee Vice Chair David Coy on June 15, 2022, Mr. Coy testified that he drafted the attached document, which relates to an “anonymous letter that BOD members received prior to the April 2007 NRA Annual Meeting.” The document purports to be a “series of questions derived from the letter.” The nature of the questions suggests that the letter raised issues related to those raised in the present litigation, including the adequacy of and compliance with numerous NRA policies and procedures, and the expenses generated by particular vendors, including I.I. & I.S. and Ackerman McQueen. As such, this letter and any response thereto is highly relevant to the present litigation, as well as responsive to, without limitation, Requests No. 2, 4, 15,16, 17, 26, 38 (including 38(h)), and 62 of the Request for Production dated June 25, 2021.

We request that you please produce the following Document, no later than Friday June 24, and reserve all rights with respect thereto:

All documents relating to the anonymous letter (“the Letter”) referenced in the document bearing bates number NRA-NYAG-CPOMMDIV-00686689, including without limitation:

- a. **The Letter received by NRA board members;**
- b. **Any board minutes or reports relating to the Letter;**
- c. **All Communications relating to the Letter;**
- d. **All documents consisting of or relating to any response to the Letter;**
- e. **The report from Jacob Frenkel referenced in Paragraph 6 of NRA-NYAG-CPOMMDIV-00686689, and all Documents related thereto.**

For your reference, as was shown at the deposition, the metadata for the document shows a creation date of 2017. Mr. Coy testified that he didn’t know why the metadata would show 2017, and further testified that he did in fact receive a letter, mailed to his home, in or around 2007.

Please let me know if you have any questions regarding the above.

Regards,
Yael

Yael Fuchs | Assistant Attorney General

Co-Chief, Enforcement Section, Charities Bureau

New York State Office of the Attorney General

28 Liberty Street, New York, NY 10005

Tel: (212) 416-8391 | yael.fuchs@ag.ny.gov

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