

B R E W E R
ATTORNEYS & COUNSELORS

January 8, 2024

VIA NYSCEF

Honorable Joel M. Cohen
Justice of the Supreme Court of the State of New York
Commercial Division, New York County
60 Centre Street
New York, NY 10007

Re: People of the State of New York by Letitia James v. National Rifle Association of America, et al., Index No. 451625/2020 (Response to Letter re: LaPierre's Departure from the NRA)

Dear Justice Cohen:

On behalf of the National Rifle Association of America (the "NRA"), we write to in response to the January 7, 2024 letter of the New York Attorney General regarding the resignation of the NRA's Executive Vice President, Wayne LaPierre. *See* NYSCEF 2699.

As the NRA stated in its trial brief, Mr. LaPierre's resignation undermines the NYAG's request for forward-looking injunctive relief. *See* NYSCEF 2682 at pp. 1-2. Such extraordinary relief may only be granted based on a showing of violations that are continuing or imminently likely to recur. *Id.* at 8-11. The key allegation in support of these drastic remedies requested by the NYAG is that "over the course of [LaPierre's] nearly 30-year tenure as the chief executive of the organization, and with the assistance of the other Individual Defendants and leaders on the NRA Board, [LaPierre] has consolidated his power and control over the NRA." Pl.'s Second Am. Compl. ("SAC"), NYSCEF 646 ¶ 61.

To answer the NYAG's questions:

1. Mr. LaPierre has no arrangements or agreements with the NRA or its affiliates regarding his resignation, severance, licensing, or consulting;
2. Mr. LaPierre holds no other position with the NRA, nor will he hold a position after his final day;
3. The NRA's Head of General Operations Andrew Arulanandam will become the interim CEO & EVP of the NRA until the NRA hires permanent successor;
4. After January 31, 2024, payments under the 2021 Employment Agreement will cease. There are no superseding employment or post-employment agreements with Mr. LaPierre;
5. Mr. LaPierre will not undertake any other employment, independent contracting, consulting or other work for the NRA or any affiliate, vendor or contractor;

B R E W E R

Hon. Joel M. Cohen
January 8, 2024
Page 2

6. The NRA is informed that Mr. LaPierre has chronic lyme disease. The NYAG's suggestion that Mr. LaPierre's health condition is not the cause of his departure is false.

Respectfully,

BREWER, ATTORNEYS & COUNSELORS

/s/ Noah Peters

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cc: All Counsel of Record (via NYSCEF)