

EXHIBIT 3



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF SOCIAL JUSTICE
CHARITIES BUREAU

May 3, 2019

By Overnight Mail

Ackerman McQueen, Inc.
1601 NW Expressway
Oklahoma City, OK 73188

DOCUMENT PRESERVATION FOR NEW YORK STATE ATTORNEY GENERAL INVESTIGATION

The New York State Office of the Attorney General (“OAG”) is currently investigating conduct by the National Rifle Association of America, Inc. and Affiliated Entities¹ (collectively, the “NRA”), including related party transactions between the NRA and its board members, directly or indirectly, including through third parties; unauthorized political activity; and potentially false or misleading disclosures in regulatory filings. Such conduct may relate to violations of New York law, including but not limited to Article 7 of the Not-for-Profit Corporation Law, Article 7-A of the Executive Law, and Article 8 of the Estates, Powers, and Trust Law.

The OAG hereby requests that the Ackerman McQueen, Inc. (hereinafter “You”, which includes your parent companies, subsidiaries, affiliates, officers, directors, partners, members, employees, agents, representatives, contractors, and consultants) preserve all physical and electronic data and records, including documents and correspondence (“Records” as defined more fully in Section II, below) pertaining to matters that are the subject of this investigation. This letter provides information regarding the current scope of the investigation and the scope of the obligation to preserve Records.

I. Current Scope of the Investigation

The scope of the investigation is subject to change based on the information collected. At the present time, You are directed to preserve all Records relating to or concerning: (1) the NRA; (2) any potential or actual services, transactions, or other conduct involving or benefitting the NRA that You considered, were made aware of or advised of, or engaged in; (3) any individuals that You know or have reason to believe have ever served as officers or directors of the NRA, or are first-degree family members or spouses of such individuals; (4) any

¹ “Affiliated Entities” include, without limitation, the NRA Foundation, Inc., NRA Civil Rights: Defense Fund, NRA Freedom Action Foundation, NRA Special Contribution Fund d/b/a NRA Whittington Center, NRA Institute for Legislative Action, and NRA Political Victory Fund.

individuals or entities that You know or have reason to believe have ever functioned as agents, consultants, or representatives of the NRA in any capacity, or are first-degree family members or spouses of such individuals. The time period relevant to this preservation notice is **January 1, 2012 to the present**, and continuing thereafter.

II. Scope of the Obligation to Preserve

“Records” is used in the broadest sense of the term and shall mean all records and other tangible media of expression of any nature, including: including hardcopy and documentary records, and other systems, as well as electronic records, video recordings, audio recordings, e-mail, text messages, instant messages, voicemail messages or social media accounts maintained directly or by or through third parties, QuickBooks records, clinical records, billings records, computer systems, removable electronic media, and other systems. “Other systems” include word processing documents, spreadsheets, databases, calendars, telephone logs, Internet usage files, and network access information. You should also preserve records and the following platforms in Your possession or in the possession of any parent company, subsidiary, affiliate, officer, director, partner, member, employee, consultant, contractor, representative, or agent of any entity or third party under Your control and/or practically accessible by You: databases, networks, computer systems, including legacy systems (hardware and software), servers, archives, backup or disaster recovery systems, tapes, discs, drives, cartridges, cloud storage, other storage media, laptops, personal computers, and tablets.


The information that should be preserved includes active data (readily accessible today), archived data (stored on backup media), and deleted data (still recoverable through the use of computer forensics).

We also request that You take affirmative steps to prevent anyone with access to Your data systems and archives from seeking to modify or destroy Records on network or local hard drives (such as by deleting or overwriting files, using data shredding and overwriting applications, defragmentation, re-imaging or replacing drives, encryption, compression, or the like). Likewise, for information or data that is identified as concerning or possibly concerning the investigation, we request that You take affirmative steps to prevent account holders from deleting such information and data in any way that would prevent You from recovering it in the future if needed.

To guard against inadvertent spoliation of evidence, please forward a copy of this letter to any and all persons and entities with custodial responsibilities for the items referred to above.

If You have any questions, please contact Senior Enforcement Counsel John Oleske at (212) 416-8660.

Sincerely,



James Sheehan
Bureau Chief, Charities Bureau