

EXHIBIT 6

B R E W E R
ATTORNEYS & COUNSELORS

August 15, 2019

VIA EMAIL

Steven Cady
Williams & Connolly LLP
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: Lt. Col. North's Proposed Production to the NYAG

Dear Mr. Cady:

On behalf of the National Rifle Association (the "NRA"), I write regarding Lt. Col. Oliver North's ("North") proposed production of documents to the Office of the New York Attorney General (the "NYAG"). The NRA has completed its review of Mr. North's proposed production to the NYAG for potentially privileged information and information that otherwise needs to be redacted as described in my August 10, 2019 letter to Brendan Sullivan.

Yesterday, we advised you that we had no objection to your production of 50 of the 65 documents Mr. North proposed to produce to the NYAG without redaction or further redaction beyond those you had applied. Upon further review, we determined that the following additional documents can be produced without any redactions or further redactions:

Documents Not Requiring Redaction or Further Redaction

PDF NUMBER	BEGBATES	ENDBATES
1	N00001	N00007
4	N00014	N00014
12	N00056	N00073
26	N00258	N00259

This letter addresses the remaining eleven documents which fall into two categories: (1) one document that is entirely privileged; and (2) ten documents that require additional redactions beyond those you had applied as reflected in translucent highlighting in the PDF we will make available through a secure FTP link contemporaneously with this letter. For your convenience, we will also send through a separate FTP link a fully redacted set of these ten documents.

We are also providing for your convenience, and for the benefit of the NYAG, the basis or bases for the additional redactions. Of course, as the privilege review was conducted under

Steven Cady
August 15, 2019
Page 2

compressed circumstances, we reserve the right to amend or supplement the below descriptions if appropriate. In addition, in accordance with the applicable law, to the extent our review has not identified additional information that should also be redacted, this letter and our two prior email messages to you are without waiver of or prejudice to any “clawback” rights the NRA has under applicable law with respect to any inadvertently produced protected information.

Documents to Withhold (1)

PDF NUMBER	BEGBATES	ENDBATES	DESCRIPTION	BASES
5	N00015	N00019	March 21, 2019 Memorandum from outside counsel (Morgan Lewis) to client (NRA) providing legal analysis and advice – reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice and refers to privileged work conducted by NRA’s outside counsel.	Attorney-client privilege; work-product

Documents Requiring Further Redactions (10)

PDF NUMBER	BEGBATES	ENDBATES	DESCRIPTION	BASES
8	N00023	N00025	N00023 (first redaction) – Reflects substance of advice of counsel to client (the NRA) and reflects information communicated confidentially by client to counsel for purposes of obtaining legal advice. N00023 (second redaction) – reveals information communicated	Attorney-client privilege; work-product; trial preparation

Steven Cady
August 15, 2019
Page 3

PDF NUMBER	BEGBATES	ENDBATES	DESCRIPTION	BASES
			confidentially by client to counsel for purposes of obtaining legal advice and refers to privileged work conducted by NRA's outside counsel. N00025 -- Reflects substance of advice of counsel provided to the NRA and information communicated confidentially by client to counsel for purposes of obtaining legal advice.	
9	N00026	N00030	N00028 (as to all redactions) -- Reflects the substance of legal advice provided by counsel to client (NRA) and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.	Attorney-client privilege; work-product; trial preparation
10	N00031	N00034	N00031 -- reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice. N00032 (first redaction) -- reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice. N00032 (FN 2) -- Reflects substance of legal advice provided by in-house and	Attorney-client privilege; work-product; trial preparation; contractual obligation to keep information confidential

Steven Cady
August 15, 2019
Page 4

PDF NUMBER	BEGBATES	ENDBATES	DESCRIPTION	BASES
			outside counsel and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice. N00033 – Reflects the terms of a confidential settlement agreement between the NRA and a third party; NRA is contractually bound to maintain in confidence the terms of said settlement agreement.	
11	N00035	N00055	N00036 (first redaction) – Reflects substance of legal advice provided by attorney to client and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice. N00036 (second redaction) – Reflects the substance of matters for which the NRA has retained outside counsel and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.	Attorney-client privilege; work-product; trial preparation
13	N00074	N00074	Reflects the terms of a confidential settlement agreement between the NRA and a third party; NRA is contractually bound to maintain in confidence the terms of said settlement agreement.	Attorney-client privilege; work-product; trial preparation; Contractual obligation to keep information confidential

Steven Cady
August 15, 2019
Page 5

PDF NUMBER	BEGBATES	ENDBATES	DESCRIPTION	BASES
17	N00118	N00126	<p>N00118 – Reflects the substance of legal advice provided by counsel to the NRA and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.</p> <p>N00120 – Reflects the terms of a confidential settlement agreement between the NRA and a third party; NRA is contractually bound to maintain in confidence the terms of said settlement agreement.</p> <p>N00122 – Reflects the substance of legal advice provided by outside counsel to the NRA and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.</p>	Attorney-client privilege; work-product; trial preparation; Contractual obligation to keep information confidential
24	N00213	N00254	<p>N00214 (both redactions) – Reflects legal advice of counsel provided to NRA and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.</p> <p>N00215 – Reflects the advice of counsel provided to the NRA and actions taken by counsel in furtherance of the rendering</p>	Attorney-client privilege; work-product; trial preparation; Contractual obligation to keep information confidential

Steven Cady
August 15, 2019
Page 6

PDF NUMBER	BEGBATES	ENDBATES	DESCRIPTION	BASES
			<p>of legal advice and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.</p> <p>N00246 – Reflects the substance of legal advice provided by counsel to the NRA and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.</p> <p>N00248 – Reflects the terms of a confidential settlement agreement between the NRA and a third party; NRA is contractually bound to maintain in confidence the terms of said settlement agreement.</p> <p>N00250 – Reflects the substance of legal advice provided by outside counsel to the NRA and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.</p>	
28	N00262	N00475	N00287 – Reflects the substance of matters for which the NRA has retained outside counsel and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.	Attorney-client privilege; work-product; trial preparation

Steven Cady
August 15, 2019
Page 7

PDF NUMBER	BEGBATES	ENDBATES	DESCRIPTION	BASES
39	N00514	N00542	<p>N00518 (both redactions) – Reflects the legal advice of counsel provided to NRA and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.</p> <p>N00519 – Reflects the advice of counsel provided to the NRA and actions taken by counsel in furtherance of the rendering of legal advice; reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.</p> <p>N00534 – Reflects the substance of legal advice provided by counsel to the NRA; reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.</p> <p>N00536 – Reflects the terms of a confidential settlement agreement between the NRA and a third party; NRA is contractually bound to maintain in confidence the terms of said settlement agreement.</p> <p>N00538 – Reflects the substance of legal advice</p>	Attorney-client privilege; work-product; trial preparation; Contractual obligation to keep information confidential

Steven Cady
August 15, 2019
Page 8

PDF NUMBER	BEGBATES	ENDBATES	DESCRIPTION	BASES
			provided by outside counsel to the NRA and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.	
47	N00681	N00749	<p>N00685 – Reflects the substance of legal advice provided by counsel to the NRA and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.</p> <p>N00687 – Reflects the terms of a confidential settlement agreement between the NRA and a third party; NRA is contractually bound to maintain in confidence the terms of said settlement agreement.</p> <p>N00689 – Reflects the substance of legal advice provided by outside counsel to the NRA and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.</p> <p>N00696 (both redactions) – Reflects the legal advice of counsel provided to NRA and reveals information communicated confidentially by client to counsel for purposes of</p>	Attorney-client privilege; work-product; trial preparation; Contractual obligation to keep information confidential

Steven Cady
August 15, 2019
Page 9

PDF NUMBER	BEGBATES	ENDBATES	DESCRIPTION	BASES
			obtaining legal advice. N00697 – Reflects the advice of counsel provided to the NRA and actions taken by counsel in furtherance of the rendering of legal advice and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice. N00728 – Reflects the substance of legal advice provided by counsel to the NRA and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice. N00730 – Reflects the terms of a confidential settlement agreement between the NRA and a third party; NRA is contractually bound to maintain in confidence the terms of said settlement agreement. N00732 – Reflects the substance of legal advice provided by outside counsel to the NRA and reveals information communicated confidentially by client to counsel for purposes of obtaining legal advice.	

Steven Cady

August 15, 2019

Page 10

Thank you for your attention to this matter. If you have any questions about the information set forth above, we are available to meet and confer further.

In addition, we note that some documents reveal sensitive information, for example information tending to reveal identifies of employees who expressed concerns over certain issues. As a result and for other reasons, it is appropriate and necessary for Mr. North, as an NRA fiduciary to make this production subject to the following disclaimer:

The producing party hereby requests, pursuant to New York Public Officers Law sections 78(2)(b) and/or (d) and 89(5)(a) and other applicable law, as well as for reasons of business confidentiality, that this communication, which is designated "Confidential," not be disclosed publicly—whether in response to a request under Article 6 of the New York Public Officers Law or otherwise. All information is submitted with the further request that it be kept in a non-public file and that access to it by any third party be denied unless such access is specifically provided by existing law.

The producing party further requests that in the event process is served upon you or a legal request is made by a third party for the information provided by the producing party in this investigation, you make, subject to legal prohibition, a good faith effort to provide the producing party with prompt prior notice of such process or request, including the identity of the party seeking production and the nature, scope, and timing of the request. Such notice should be given in sufficient time to enable the NRA to oppose disclosure. Under such circumstances, please telephone me at ____-____-____.

Sincerely,

/s/ Svetlana M. Eisenberg

Svetlana M. Eisenberg

cc: Emily Stern, Assistant Attorney General (via email: emily.stern@ag.ny.gov)
John Frazer, Secretary and General Counsel, The National Rifle Association or America (via email: John.Frazer@nrahq.org)
Wit Davis (via email: witdavis1980@gmail.com)

Steven Cady
August 15, 2019
Page 11

4841-6318-9664, v. 1