NYSCEF DOC. NO. 2948

INDEX NO. 451625/2020

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Name: LAPIERRE

National Rifle Association Financial Disclosure Questionnaire 2021

Instructions

For purposes of all questions:

- "Entity" means any company, corporation, association, partnership, or sole proprietorship, whether for-profit or non-profit. It specifically includes any professional fundraising firm.
- "NRA Entity" means The NRA Foundation, NRA Civil Rights Defense Fund, NRA Freedom Action Foundation, NRA Political Victory Fund, NRA Victory Fund, NRA Special Contribution Fund (d/b/a NRA Whittington Center), NRA Holdings, Inc., Lexington & Concord Holdings LLC, or Wingate Church Insurance Services, Inc.
- "Relative" means any ancestor, spouse, brother or sister (whether whole or half blood), child (whether natural or adopted), grandchild, great-grandchild, or domestic partner, as well as spouses or domestic partners of brothers, sisters, children, grandchildren, and great-children.

If you answer "yes" to any question in this section, please attach details on a separate page, including the nature of the relationship or transaction, the names of persons or entities involved, and the time periods and dollar amounts involved. We will contact you if we need any further information, or if your answers may affect your service as an officer, director, or employee in any way. We will disclose only the minimum information required by law or by the NRA Bylaws.

Transactions with NRA Entities and Conflicts of Interest

- 1. Do you or any relative expect to receive, or have you or any relative received in the last three years, any compensation from the NRA or any NRA Entity?
 - Examples would include consulting, legal, or performance fees, or payment for providing any other goods or services to the NRA.
 - This does not include reimbursement of expenses incurred in the course of your duties as an officer or director. It also does not include salaries of officers or former employees.

Yes.	Please provide details.
∠ No.	

2. Do you or any relative do business with the NRA that was not reported in question 1, or do you or any relative have any relationship with, or financial interest in, any non-NRA entity (whether for-profit or not-for-profit) (e.g., as an owner, officer, director, employee, etc.) that does business with, or receives funds from, the NRA or any NRA Entity?

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- Examples would include consulting, legal, or performance fees, or payment for providing any other goods or services to the NRA, if the funds were paid to a business or organization rather than to you personally.
- This would also include transactions in which a non-NRA entity pays the NRA for goods or services. Examples include placement of advertising in NRA magazines or on NRA websites, or leasing exhibit space at the NRA Annual Meetings and Exhibits.
- Dues and contributions paid to the NRA also should not be reported.

Yes.	Please provide details
/ No.	ş

- 3. Do you or any relative have any management, ownership, employment or financial relationship with any non-NRA entity that has (or is seeking to have) a business relationship with or receive funds from the NRA or any NRA Entity?
 - Examples would include being an owner, officer, director, employee, contractor, or subcontractor of a company that provides (or is seeking to provide) goods or services to the NRA, or an officer or director of a club or association that has applied for or received a grant from the NRA Foundation or NRA Civil Rights Defense Fund.
 - This does not include merely being a member of an organization that seeks NRA funding, or other minor relationships that couldn't reasonably lead to any conflict of interest (such as owning a few shares of stock in a company that may do business with the NRA).

Yes.	Please provide details.
No.	

- 4. Have you or any relative received, or do you or any relative expect to receive, any gift, gratuity, personal favor, or entertainment with either a retail price or fair market value in excess of \$250 from any person or entity that has or is seeking to have a business relationship with, or receive funds from, NRA or any NRA Entity?
 - Please do not include transactions that occur in the ordinary course of business on the same terms as are generally offered to the public, including standard industry and professional discounts.

Yes.	Please provide	details.
✓ No.		

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5. Are you or a relative now or have you or a	relative been, w	vithin the last thre	e
years, an employee of the NRA or any NRA Entity?			_

Yes. Please provide details. (No salary information is required.)

No.

6. Do you have any family or business relationship with any officer, director, trustee, or employee of the NRA or any NRA Entity? Please do not include transactions that occur in the ordinary course of either party's business on the same terms as are generally offered to the public.

Yes. Please provide details.

No.

7. To the best of your knowledge, is there any transaction that you have not disclosed above in which the NRA is a participant and in which you might have a conflicting interest?

Yes. Please provide details.

No.

Other Disclosures

8. Have you ever been convicted of a misdemeanor or felony, or pleaded no contest to a felony? Please be aware that in many states, serious traffic violations such as reckless driving are classified as misdemeanors. (Do not include any conviction that has been expunged, pardoned, or set aside, or any juvenile delinquency adjudication.)

Yes. Please provide details.

No.

- 9. Are you, or have you <u>ever</u> been, subject to any administrative or judicial proceeding (including a voluntary agreement with any government agency) involving any alleged violation of laws or regulations related to:
 - (a) charitable registration, solicitation, recordkeeping, or asset administration,
 - (b) theft, fraud, or deceptive business practices,
 - (c) taxation or revenue,
 - (d) securities or consumer fraud, or
 - (f) antitrust or restraint of trade?

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Yes. Please provide details, including the court or other forum, case number, title and date of the action, and whether any injunction, judgment, decree, or order was entered.

___ No.

10. Have you ever been the subject of a civil injunction, judgment, or administrative order (such as a cease and desist order or consent decree from a regulatory agency)?

Yes. Please provide details.
No.

- 11. Have you <u>ever</u>, during the bankruptcy or receivership of any other corporation, been:
 - An officer, director, trustee or incorporator of that corporation (whether for-profit or non-profit); or
 - A person who controlled or held over 20% of the issued and outstanding common shares, or 20% of any other proprietary, beneficial, or membership interest in that corporation (but only if the corporation was a for-profit corporation)?

Yes. Please provide details.
No.

12. To help us double check any transactions that may not have been reported above (including future transactions), please provide information about your involvement with any non-NRA entities in fields with which the NRA might reasonably be involved as a customer, donor, partner, or competitor. Please include any for profit or non-profit entity that may fit that description, and in which you or a relative are an officer or director, or in which you or a relative have a 35% or greater ownership or beneficial interest or (in the case of a partnership or professional corporation) a direct or indirect ownership interest in excess of 5%. (Please attach additional pages if necessary.)

No relationships or interests to report.

See below or attached.

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Date: 4/7/2/

By my signature below, I affirm that:

- My answers are true and correct to the best of my knowledge, and I will inform the Secretary's Office if any of my answers change;
- I have received a copy of the NRA's Conflict of Interest and Related Party Transaction Policy;
- I have read and understand that policy and agree to comply with it; and
- I understand that in order to maintain the NRA's federal tax exemption it
 must engage primarily in activities which accomplish its tax-exempt
 purposes.

Signed: War La Trein

Print name: WAINE LAPIEME

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Addendum

#3: My niece, Colleen Sterner, is an employee of the Women's Leadership Forum. Although she does not technically satisfy the definition of "relative" and therefore has not been listed on previous conflict forms, she is listed here in the interest of ever-greater transparency.

#4: Although there are no gifts to report within the 2020 reporting period, I did stay on David McKenzie's yacht (at no cost to the NRA) on at least two prior occasions. During at least one of these trips, I filmed segments for CrimeStrike, but the trip also had a personal component. I was joined by immediate and extended family members on the yacht on at least some instances. Although they were purchased for business reasons and are not a gift or gratuity, it also recently became clear in the context of litigation discovery that certain wardrobe purchases coordinated by Ackerman were absorbed by Ackerman, not billed to the NRA. In its lawsuit against the NRA (discussed below), the NYAG also alleges "gifts" relating to the filming of Under Wild Skies. These allegations are disputed.

#5: My niece, Colleen Sterner, is an employee of the Women's Leadership Forum. Although she does not technically satisfy the definition of "relative" and therefore has not been listed on previous conflict forms, she is listed here in the interest of ever-greater transparency.

#9: I am a defendant in a case pending in the Supreme Court of the State of New York, New York County, Index No. 451625/2020, 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 (the "NYAG lawsuit"). No injunction, judgment, decree or order has been entered, except an order denying motions to dismiss, transfer or stay and other routine procedural orders. In addition to the NYAG lawsuit, I have been named as a third-party defendant by Ackerman in the NRA's N.D. Texas litigation, National Rifle Association of America v. Ackerman McQueen Inc., Mercury Group, Inc., Henry Martin, William Winkler, Melanie Montgomery, and Jesse Greenberg, Civil Action No. 3:19-cv-02074, based on analogous (and sharply disputed) claims. No injunction, judgment, decree or order has been entered in this lawsuit. Finally, I was similarly named as a defendant in the NRA's Dell'Aquila litigation, David Dell'Aquila v. Wayne LaPierre, the National Rifle Association of America, and the NRA Foundation, Inc., Civil Action No. 3:19-cv-00679 (United States District Court for the Middle District of Tennessee), but allegations against me were dismissed.