

August 6, 2019

The Honorable Letitia James  
Attorney General of New York State  
The Office of the New York State Attorney General  
28 Liberty Street  
19th Floor  
New York, NY 10005

Dear Attorney General James:

My name is David Dell'Aquila. I am the organizer of a group called "Grassroots NRA members and non-members." We are a group of members of the National Rifle Association (the "NRA"), non-members, and millions of voters who are displeased with the current financial mis-management of the NRA.

I would like to commend you for starting an investigation into the NRA finances. At one time, I was fairly close to the NRA's leadership, and can attest that such an investigation is warranted.

I am writing to encourage you to pursue your investigation of the NRA with vigor, and at the soonest possible time. The followers of the Grassroots are concerned that your office will intentionally delay taking action against the NRA until we are much further into next year's Presidential election cycle.

I have discussed the situation with several persons, who are familiar with the situation. Their primary concern is your investigation will drag out for a period of time and into the few months prior to the 2020 elections. Moreover, they are concerned that New York State will implement an early morning police raid – similar to what occurred to Roger Stone – at the homes of Mr. and Mrs. LaPierre, the NRA Leadership, and specific members of the Board of Directors. The followers of the Grassroots are concerned that this raid would be intended to influence the Presidential election, by attempting to discredit the NRA.

I have in fact, informed them that you are obligated to pursue your investigation of the NRA, or any other organization for that matter, with the utmost sanctity to faithfully seek justice with a "blind eye" thus eliminating any possibility of partisan politics and irrespective of the subject organization's political association. I assured them their feared-scenario will not happen, because of your duty not to politicize this issue, and to the extent possible, not allowing it to affect the 2020 elections.

Another concern of the Grassroots members is that your office will take too long to issue subpoenas to the NRA leadership team, key management, and board members – for similar purposes –when your office has already issued subpoenas requesting financial documents from the NRA and its affiliate organizations (i.e., NRA Foundation) in April. Once again, I vouched for your integrity, and was emphatic that your investigation into the NRA was *not* politically motivated.

In any event, I have been reviewing all remedies available to Grassroots NRA under New York corporate law; and it appears that there are several.

We have finally obtained consensus to commence a civil class action suit on behalf of the NRA members against the NRA and its leadership, for fraud in the use of donated funds. We anticipate issuing subpoenas to the NRA for much of the same financial information that you and the Attorney General of Washington D.C. are already seeking.

As part of this litigation, we anticipate presenting a motion to the New York courts requesting that the judge appoint a temporary custodian for the NRA. In such motion, we are prepared to argue irreparable harm to the plaintiffs, by misuse of funds sent to it by its members.

Finally, as indicated above, I respectfully hope that our cases/investigations concerning the NRA will be solved well ahead of the elections of 2020.

Sincerely,



David Dell'Aquila, representing Grassroots NRA members and non-members as well as millions of voters

cc: The Honorable Andrew Cuomo, Governor of the State of New York

Bill de Blasio, Mayor of the City of New York