



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20461

THIS IS THE END OF MUR # 1-110

Date Filmed 5/10/84 Camera No. --- 2

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1125 K STREET N.W.
WASHINGTON, D.C. 20461

FEDERAL ELECTION COMMISSION

Conservative Correspondence

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

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| <input type="checkbox"/> (5) Internal Documents | |

Signed Janet Shepard
date 4/25/84

FEC 9-21-77

5-4-84

84040454213

Form 3811, Jan. 1979
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- Show to whom and date delivered..... 0
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ARTICLE ADDRESSED TO:

James J. Featherstone

ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.

919639

(Always obtain signature of addressee or agent)

I have received the article described above.
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4. *Cheryl Bryan*
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1979 : 1979-380-008



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James J. Featherstone
General Counsel
National Rifle Association
Political Victory Fund
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1110

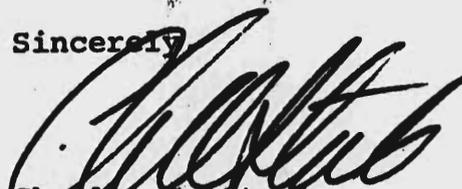
Dear Mr. Featherstone:

You were previously notified on October 2, 1980, that the Federal Election Commission found probable cause to believe that the National Rifle Association Political Victory Fund and the National Rifle Association Institute For Legislative Action violated 2 U.S.C. § 441b(a) in connection with the captioned matter.

As a result of our inability to settle this matter through conciliation, the Commission has authorized the institution of a civil action for relief in the U.S. District Court.

Should you have any questions, or should you wish to settle this matter prior to suit, please contact Gary Johansen at (202) 523-4143.

Sincerely,



Charles N. Steele
General Counsel

R 4 0 4 0 4 5 4 2 1 4

CERTIFIED MAIL
RETURN RECEIPT

James J. Featherstone
General Counsel
National Rifle Association
Political Victory Fund
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

Re: NRA 1110

Dear Mr. Featherstone:

You were previously advised that the Commission believes that the National Rifle Association Political Victory Fund and the National Rifle Association Institute For Legislative Action violated 18 U.S.C. § 601b(a) in connection with the captioned matter.

As a result of our inability to settle this matter through conciliation, the Commission has authorized the institution of a civil action for relief in the U.S. District Court.

Should you have any questions, or should you wish to settle this matter prior to suit, please contact Gary Johansen at (202)523-4143.

Sincerely,

Charles W. Steele
General Counsel

JT/dmm 02/05/81

JA
2-17-81

8404045421B

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
National Rifle Association Political)	MUR 1110
Victory Fund (NRA-PVF))	
National Rifle Association Institute)	
for Legislative Action (NRA-ILA))	

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on March 17, 1981, do hereby certify that the Commission took the following actions in MUR 1110:

1. Failed by a vote of 3-2 to pass a motion to authorize the Office of General Counsel to file civil suit for relief in the United States District Court against the National Rifle Association Political Victory Fund and the National Rifle Association Institute for Legislative Action, provided,

Commissioners Reiche, Thomson, and Tiernan voted affirmatively for the motion; Commissioners Harris and McGarry dissented. Commissioner Aikens was not present at the time of the vote.

2. Decided by a vote of 4-1 to act as follows:

- a) Authorize the Office of General Counsel to file civil suit for relief in the United States District Court against the National Rifle Association Political Victory Fund and the National Rifle Association Institute for Legislative Action.
- b) Send the letter attached to the General Counsel's February 5, 1981 report.

Commissioners Harris, Reiche, Thomson, and Tiernan voted affirmatively; Commissioner McGarry dissented. Commissioner Aikens was not present.

Attest:

3/20/81

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

84040454216

BEFORE THE FEDERAL ELECTION COMMISSION

February 5, 1981

In the Matter of)

National Rifle Association Political)
Victory Fund (NRA-PVF))

National Rifle Association Institute)
For Legislative Action (NRA-ILA))

MUR 1110

GENERAL COUNSEL'S REPORT

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IV. Recommendations:

1. Authorize the Office of General Counsel to file civil suit for relief in the United States District Court against the National Rifle Association Political Victory Fund and the National Rifle Association Institute For Legislative Action.
2. Send the attached letter.

Attachments

1. Featherstone Letter 01/28/81
2. Proposed Letter

11 March 1981
Date



Charles N. Steele
General Counsel

R 4 0 4 0 4 5 4 2 1 9



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James J. Featherstone
General Counsel
National Rifle Association
Political Victory Fund
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1:10

Dear Mr. Featherstone:

You were previously notified on October 2, 1980, that the Federal Election Commission found probable cause to believe that the National Rifle Association Political Victory Fund and the National Rifle Association Institute For Legislative Action violated 2 U.S.C. § 441b(a) in connection with the captioned matter.

As a result of our inability to settle this matter through conciliation, the Commission has authorized the institution of a civil action for relief in the U.S. District Court.

Should you have any questions, or should you wish to settle this matter prior to suit, please contact Gary Johansen at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

ATTACHMENT 2

84040454220

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
National Rifle Association Political)
Victory Fund)
National Rifle Association Institute)
For Legislative Action)

MUR 1110

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on September 23, 1980, do hereby certify that the Commission took the following actions on MUR 1110:

1. Failed on a vote of 3-3 to pass a motion to:
 - a) Find probable cause to believe that National Rifle Association Institute For Legislative Action and National Rifle Association Political Victory Fund violated 2 U.S.C. §441b(a);
 - b) Seek to obtain a letter from the National Rifle Association Political Victory Fund that they would change their method of paying for travel expenses;
 - c) _____
 - d) Close the file in this case.

Commissioners Aikens, Friedersdorf, and McGarry voted affirmatively for the motion; Commissioners Harris, Reiche, and Tiernan dissented.

Continued

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2. Failed on a vote of 3-2 to pass a motion to find probable cause to believe that National Rifle Association Institute For Legislative Action and National Rifle Association Political Victory Fund violated 2 U.S.C. §441b(a).

Commissioners Harris, Reiche, and Tiernan voted affirmatively for the motion; Commissioners Friedersdorf and McGarry dissented; Commissioner Aikens abstained.

3. Decided by a vote of 4-2 to find probable cause to believe that National Rifle Association Institute for Legislative Action and National Rifle Association Political Victory Fund violated 2 U.S.C. §441b(a), but

Commissioners Aikens, Harris, Reiche, and Tiernan voted affirmatively for the decision; Commissioners Friedersdorf and McGarry dissented.

Attest:

9/26/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

84040454222

BEFORE THE FEDERAL ELECTION COMMISSION
September 5, 1980

In the Matter of)
)
National Rifle Association Political) MUR 1110
Victory Fund)
National Rifle Association Institute)
For Legislative Action)

GENERAL COUNSEL'S REPORT

I. Statement of the Case

On February 26, 1980, the Commission found reason to believe that the National Rifle Association Political Victory Fund (NRA-PVF) and the National Rifle Association Institute For Legislative Action (NRA-ILA) violated 2 U.S.C. § 441b(a). These findings were based on information forwarded to the Office of General Counsel by the Reports Analysis Division. The information focused on independent expenditure entries made to NRA-ILA by the NRA-PVF. The Reports Analysis Division had previously questioned the NRA-PVF concerning entries totalling \$1,932.75 and forwarded additional entries totalling \$3,815 which it had not previously pursued.

Mr. Featherstone, treasurer of the NRA-PVF initially responded to the reason to believe notification by phone and subsequently met with Commission employees on March 12, 1980. On March 31, 1980, a written response was submitted by Mr. Featherstone. Mr. Featherstone's response presented a detailed account of each independent expenditure made payable to the NRA-ILA. Of the sixteen entries in question, fifteen entries involved the payment of travel expenses to the NRA-ILA by the NRA-PVF and one entry involved the payment of printing costs to the NRA-ILA by the NRA-PVF.

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The information submitted by Mr. Featherstone indicates that the NRA-PVF travel expenses were for travel to disseminate communications which advocated the election or defeat of certain federal candidates and for travel to assist in federal candidates' campaigns. With respect to travel expenses, Mr. Featherstone's response revealed that the NRA-ILA maintained an account for its corporate travel with the Beeson Travel Agency, that the NRA-PVF used the same travel agency for its political travel, and that the NRA-PVF travel expenses were charged to the NRA-ILA account.

Subsequently, the NRA-ILA would receive various invoices from the travel agency for its travel as well as the travel of the NRA-PVF. The NRA-ILA would pay the invoices submitted to it by the Beeson Travel Agency and, sometime thereafter, the NRA-PVF would reimburse the NRA-ILA for its share of the travel expenses.

Below is a chart showing the cost of NRA-PVF's share of travel expenses, the date the NRA-ILA paid the travel agency, and the date of NRA-PVF's payment to the NRA-ILA for its share of travel expenses.

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Cost of PVF's Travel	ILA Payment to Travel Agency	PVF Payment to NRA-ILA
\$312	11/13/78	02/13/79
312	11/13/78	02/13/79
120	11/13/78	02/13/79
226	11/13/78	02/13/79
312	11/13/78	02/13/79
312	11/13/78	02/13/79

Cost of PVF's Travel	ILA Payment to Travel Agency	PVF Payment to NRA-ILA
206 <u>1/</u>	08/17/78	09/20/78
222	10/24/78	10/31/78
308	10/24/78	10/31/78
120	11/13/78	11/16/78
226	11/13/78	11/16/78
61	11/13/78	11/16/78
312	11/13/78	11/16/78
414	11/17/78	12/27/78
414	11/13/78	02/13/79

As shown by the chart, the time between NRA-ILA's payment of the invoices and NRA-PVF's reimbursement to the NRA-ILA ranged from three days to three months.

The one non-travel expenditure paid to the NRA-ILA by the NRA-PVF was for the cost of printing postcards which advocated the defeat of a federal candidate and totalled \$438.75.

Mr. Featherstone's response indicated that the NRA-ILA regularly used the services of National Creative Printing to perform printing services; that the NRA-PVF used the same vendor for its printing; and that the charges for NRA-PVF's printing were included on an invoice to NRA-ILA. The NRA-PVF paid the NRA-ILA for its share of printing costs on December 11, 1978. The NRA-ILA paid the total invoice charge the following day, December 12, 1978.

1/ This figure was previously recorded as \$1,738, however, respondents' brief amended this figure to correctly reflect the outstanding balance.

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On July 8, 1980, Mr. Featherstone received notice of the General Counsel's intent to proceed to a vote on a probable cause to believe determination. The notice included a brief stating the position of the General Counsel on the legal and factual issues of this case.

The respondent requested an extension of time in which to reply to the brief; the Commission granted an extension until August 13, 1980.

II. Legal Analysis

The Office of General Counsel's legal analysis is contained in the OGC Brief dated May 5, 1980.^{2/}

The respondent filed a responsive brief on August 13, 1980.

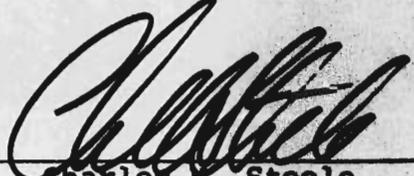
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^{2/} Page 4, paragraph 3 of the OGC Brief incorrectly identifies a \$438.78 expenditure as "non-federal ..." This opening sentence should correctly read, "The one non-travel expenditure ...".

IV. Recommendation

Find probable cause to believe that National Rifle Association Institute For Legislative Action and National Rifle Association Political Victory Fund violated 2 U.S.C. § 441b(a).

15 Sept 1980
Date



Charles N. Steele
General Counsel

84040454227

- Attachments**
- Brief
 - Letter
 - Conciliation Agreement

Handford

NATIONAL RIFLE ASSOCIATION OF AMERICA
INSTITUTE FOR LEGISLATIVE ACTION
1800 RHODE ISLAND AVENUE
WASHINGTON, D.C. 20036

RECEIVED
GENERAL COUNSEL

80 AUG 13 P 4: 45

August 13, 1980

General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1110

Dear Sir:

R 4 0 4 0 4 5 4 2 2 8

This is in response to your letter of June 16, 1980, in which you advised that after considering all the evidence available to the Commission, you are prepared to recommend that the Commission find probable cause to believe that a violation has occurred. The Commission had, on February 26, 1980, found reason to believe that the National Rifle Association Political Victory Fund and the National Rifle Association Institute for Legislative Action had violated the Federal Election Campaign Act of 1971, as amended, specifically 2 USC 441 b(a).

Your letter of June 16, 1980, also transmitted a brief stating your position on the legal and factual issues of the case which, in your words, is "focused on independent expenditure entries made to NRA-ILA by the NRA-PVF." The basic facts in the case were obtained from reports filed by the PVF in compliance with the Federal Election Campaign Act. Additional information was furnished in my letter to the Commission of March 28, 1980. Simply stated, the facts are:

On thirteen relevant occasions in 1978, ILA employees travelled to disseminate communications advocating the election or defeat of certain candidates. Their transportation expenses were reported as independent expenditures, since the expenditures were not made in consultation with, or with the cooperation of, any candidate. On two other occasions, ILA employees travelled to assist in the campaigns of two candidates and their transportation was paid for and reported as in-kind contributions. Travel arrangements had been made through a travel agency with which ILA maintained a charge account. ILA was billed in due course for this travel as well as for other travel undertaken by ILA employees on regular ILA business. ILA, in the regular course of business, paid the bills in their entirety and the PVF paid for the PVF travel by issuing a check to ILA.

ATTACHMENT I pg 1

With one change, below is the chart taken from your brief which shows the cost of the PVF's share of travel expenses, the date ILA paid the travel agency, and the date of the PVF's payment to ILA for its share of travel expenses.

Cost of PVF's Travel	ILA Payment to Travel Agency	PVF Payment to NRA-ILA
\$312	11/13/78	02/13/79
312	11/13/78	02/13/79
120	11/13/78	02/13/79
226	11/13/78	02/13/79
312	11/13/78	02/13/79
312	11/13/78	02/13/79
*206	08/17/78 09/21/78	09/20/78
222	10/24/78	10/31/78
308	10/24/78	10/31/78
120	11/13/78	11/16/78
226	11/13/78	11/16/78
61	11/13/78	11/16/78
312	11/13/78	11/16/78
414	11/17/78	12/27/78
414	11/13/78	02/13/79

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*The sum of \$1,738 appeared on your chart. The \$206 now on the chart represents the PVF travel expense paid by the ILA check issued on August 17, 1978. Since PVF paid ILA on September 20, 1978, the PVF travel expense in the amount of \$1,532 paid by the subsequently issued ILA check of September 21, 1978, has been eliminated. This is consistent with your determination with regard to printing costs on p. 4 of your memorandum, where PVF paid its share of the costs prior to the payment of the vendor by ILA.

I p 2

August 13, 1980

You are prepared to recommend, based on the foregoing, that the Commission find that ILA and PVF have violated 2 USC 441 b(a). The gravamen of the charge is that ILA used corporate funds to 1) make independent expenditures and 2) make in-kind contributions. The last two items on the chart are the in-kind contributions. As I understand the theory of your case, you have concluded that ILA loaned the PVF corporate money when it issued the checks in payment of the travel expenses listed on the above chart. Presumably, then, you would regard the loan as having been repaid when the PVF issued its check in payment of its share of the travel expenses reflected in the travel agency's bill.

Discussion

The applicable section of law, 2 USC 441 b(a) provides, in pertinent part:

(a) It is unlawful ... for any corporation whatever ... to make a contribution or expenditure in connection with any election at which ... a Senator or Representative in ... Congress are to be voted for, or in connection with any primary election ... held to select candidates for any of the foregoing offices, or for any ... political committee ... knowingly to accept or receive any contribution prohibited by this section...

(b) ...

(2) For purposes of this section, ... the term "contribution or expenditure" shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services or anything of value ... to any candidate, campaign committee, or political party or organization, in connection with any election to any of the offices referred to in this section; but shall not include -- ...

(c) the establishment, administration, and solicitation of contributions to a separate segregated fund to be utilized for political purposes by a corporation, ... membership organization ... or corporation without capital stock.

It is apparent from a reading of the definition of the term "contribution or expenditure" contained in 2 USC 441 b(a) that it does not include independent expenditures within its scope. The definition clearly confines itself to payments and loans to "any candidate, campaign committee, or political party or organization ..." The first thirteen expenditures

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August 13, 1980

listed above were made to a travel agency without the cooperation of, or consultation with, any candidate. Not being prohibited by 2 USC 441 b(a), since not made "to any candidate, campaign committee, or political party or organization ...", they cannot be regarded as producing an obligation on the part of PVF to repay them. It therefore follows that there was no loan made by ILA to PVF as there would have been had ILA distributed money to the PVF. This conclusion is not changed by virtue of the fact that PVF subsequently opted to pay for the independent expenditure travel. Had the PVF not paid for the travel, ILA still would not have been in violation of 2 USC 441 b(a).

The Commission obviously recognized that this conclusion is accurate and that 2 USC 441 b does not proscribe independent expenditures when it drafted section 114.1 of the Regulations which states, in pertinent part:

(a) For purposes of Part 114 ...

(1) The term "contribution or expenditure" shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value ... to any candidate, political party or committee, organization, or any other person in connection with any election to any of the offices referred to in §114.2(a) or (b) as applicable. (emphasis added)

The addition of the words "any other person" underlined above, is clearly an attempt to provide by regulation what the Congress failed to legislate.

It is by no means clear, moreover, that the Supreme Court would consider a ban on corporate independent expenditures to be constitutional. In Buckley v. Valeo, 96 S. Ct. 612(1976) the Supreme Court found that the independent expenditure ceiling imposed by former 18 USC 608(e)(1) heavily burdened core First Amendment expression and stated:

"Advocacy of the election or defeat of candidates for federal office is no less entitled to protection under the First Amendment than the discussion of political policy generally or advocacy of the passage or defeat of legislation." at 648.

The Court rejected the concept that government may restrict the speech of some elements of our society in order to enhance the relative voice of others. 96 S. Ct. at 649.

I pg 4

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Subsequently in First National Bank of Boston v. Bellotti, 96 S. Ct. 1407, (1978), the Supreme Court found unconstitutional a state statute which prohibited certain expenditures by banks and business corporations for the purpose of influencing the vote on referendum proposals, unless the proposals materially affect its business, property, or assets. The Court stated:

If the speakers here were not corporations, no one would suggest that the State could silence their proposed speech. It is the type of speech indispensable to decisionmaking in a democracy, and this is no less true because the speech comes from a corporation rather than an individual. The inherent worth of the speech in terms of its capacity for informing the public does not depend upon the identity of its source, whether corporation, association, union, or individual. 96 S. Ct. at 1416.

The Court went on to remark in footnote 26, that:

... our consideration of a corporation's right to speak on issues of general public interest implies no comparable right in the quite different context of participation in a political campaign for election to public office. Congress might well be able to demonstrate the existence of a danger of real or apparent corruption in independent expenditures by corporations to influence candidate elections. 96 S. Ct. at 1422.

It cannot be said with absolute certitude, therefore, that the Supreme Court would find unconstitutional a law prohibiting independent expenditures by corporations. It does appear clear, however, that the Supreme Court has recognized that the Congress has not as yet enacted such a law.

ADDITIONAL COMMENTS

In addition to the above discussion of the law applicable to this case, I believe the following observations are relevant:

1. The amount involved is de minimis. You allege loans of \$3,049 (independent expenditures) and \$828 (in-kind contributions), for a total of \$3,877. As I understand it under your theory of the case, the benefit to the PVF would be the interest it did not pay to ILA but would have been obligated to pay to another lender. As indicated in the enclosed letter from our accountants, LeStrange and LeStrange,

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Federal Election Commission

Page 6

August 13, 1980

the total interest involved for both the independent expenditures and the in-kind contributions would be \$70.42. The interest involved in the in-kind contributions alone would be \$5.44 and \$12.52, for a total of \$17.96.

2. The essential facts of this case appear on the face of the reports filed by the PVF. There is no evidence to suggest, and there is no basis for an allegation, that the PVF has acted other than in complete good faith. The PVF has been complete and open in its reporting and other practices.

3. The PVF balance during the time the transactions in question occurred was between \$568,565.63 and \$90,333.09, with an average cash balance of \$305,895.00, which constitutes a reductio ad absurdum of any suggestion that the PVF had a need to borrow ILA money for any purpose. The letter from LeStrange and LeStrange also reflects the computation of the average cash balance.

4. The practice used by ILA and PVF to pay the travel agency bills was a system with adequate internal accounting and administrative controls and was not at variance with generally accepted accounting principles. In fact, the system ensured that PVF money was prudently and properly spent and operated to prevent even the inadvertent commingling of PVF and ILA funds. Thus, all the payments in question, even when viewed in accordance with your theory of the case, amount to administrative support of the PVF by ILA, permitted under 2 USC 441 b (b)(C).

5. When the Commission first communicated with me in May 1979, concerning this matter, my initial reaction was basically as outlined in the previous comment. I, nonetheless, by way of accomodation, changed our system. As it now functions, ILA and PVF issue separate checks in payment of bills such as those in question. I was, therefore, more than mildly surprised when you advanced to the "reason to believe" stage and now contemplate a "probable cause to believe" recommendation. Since that time, I have had occasion to review a number of MUR's and it occurs to me that your treatment of this matter is at variance with your handling of other basically de minimis matters involving no intent to violate the law. In this connection please refer to MURs 1134, 1129, 1113, 1063, 1054, 1097, 1182, 1126, 1024, 1033, 1074.

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Federal Election Commission
Page 7
August 13, 1980

Conclusion

The General Counsel should recommend to the Commission that it find no probable cause to believe that a violation has occurred and that it close its file in this matter.

Sincerely,

James J. Featherstone
James J. Featherstone
General Counsel

JJF:jkm
Enclosure

84040454234

I pg 7

LESTRANGE AND LESTRANGE
CERTIFIED PUBLIC ACCOUNTANTS
ONE WEST DEER PARK ROAD
SUITE 403
GAITHERSBURG, MARYLAND 20760
TELEPHONE (301) 948-1033

KEVIN J. LESTRANGE, CPA

WILLIAM R. LESTRANGE, JR., CPA

MEMBERS:
AMERICAN INSTITUTE OF CPAs
MARYLAND ASSOCIATION OF CPAs

August 11, 1980

James J. Featherstone
Institute for Legislative Action
National Rifle Association
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

Dear Jim:

Enclosed herewith are the following schedules which have been prepared at your request for the N.R.A. Political Victory Fund:

1. Analysis of Accrued Interest Expense on Travel Amounts Paid By ILA & Reimbursed by NRAPVF
2. Average Cash Balances for the Period August 1, 1978 to February 1, 1979

It is my understanding that the PVF is a separate fund of the Institute for Legislative Action (ILA). It is my further understanding that, on occasion, ILA has paid certain PVF travel bills that have been included on invoices rendered to ILA. All of the amounts that were paid by ILA on behalf of the PVF were reimbursed, as always, in the normal course of business. The PVF average cash balance during the period in question was \$305,895. This seems to offer a clear indication that the use of ILA funds was not done out of necessity, but simply for convenience purposes.

In a relationship such as the one between ILA and the PVF, it is not unusual for both entities to purchase goods and services from the same vendors. This is a very common practice that is used to take advantage of credit arrangements that have been established by the "parent" entity. This practice, used in a system with adequate internal accounting and administrative controls, certainly is not at variance with generally accepted accounting principles. Furthermore, your independent auditors, Touche Ross & Co., having made a study and evaluation of the system of internal accounting and administrative controls in connection with their examination of the financial statements of both entities, made no mention of this practice having any effect on the safeguarding of assets or the reliability of financial records for preparing financial statements and maintaining accountability for assets.

Please let me know if I may be of any further assistance.

Very truly yours,



William R. LeStrange, Jr.

WRL/hhb
Enclosures

F 158

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NRA POLITICAL VICTORY FUND
Analysis of Accrued Interest Expense
On Travel Amounts Paid by ILA & Reimbursed by NRAPVF

<u>Travel Amount</u>	<u>Date Paid By ILA</u>	<u>Date Reimbursed by NRAPVF</u>	<u># of Days Outstanding</u>	<u>Accrued Interest @ 12%</u>
\$ 312.00	11-13-78	2-13-79	92	\$ 9.44
312.00	11-13-78	2-13-79	92	9.44
120.00	11-13-78	2-13-79	92	3.63
226.00	11-13-78	2-13-79	92	6.84
312.00	11-13-78	2-13-79	92	9.44
312.00	11-13-78	2-13-79	92	9.44
206.00	8-17-78	9-20-78	34	2.30
222.00	10-24-78	10-31-78	7	.51
308.00	10-24-78	10-31-78	7	.71
120.00	11-13-78	11-16-78	3	.12
226.00	11-13-78	11-16-78	3	.22
61.00	11-13-78	11-16-78	3	.06
312.00	11-13-78	11-16-78	3	.31
414.00	11-17-78	12-27-78	40	5.44
414.00	11-13-78	2-13-79	92	12.52
		<u>Total</u>		<u>\$ 70.42</u>

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I pg 9

NRA POLITICAL VICTORY FUND
Average Cash Balance
For the Period August 1, 1978 to February 1, 1979

<u>Date</u>	<u>Amount</u>	
August 1, 1978	\$ 568,565.63	x 31 Days \$ 17,625,534.53
September 1, 1978	517,419.96	x 30 Days 15,522,598.80
October 1, 1978	423,186.98	x 31 Days 13,118,796.38
November 1, 1978	289,390.46	x 30 Days 8,681,713.80
December 1, 1978	155,592.05	x 31 Days 4,823,353.55
January 1, 1979	89,158.49	x 31 Days 2,763,913.19
February 1, 1979	90,333.09	x 29 Days <u>2,619,659.61</u>
		213 Days \$ 65,155,569.86
		÷
		<u>213 Days</u>
<u>AVERAGE CASH BALANCE</u>		<u>\$ 305,894.69</u>

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I pg 10



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James J. Featherstone
General Counsel
National Rifle Association
Political Victory Fund
1600 Rhode Island Ave., N.W.
Washington, D.C. 20036

Re: MUR 1110

Dear Mr. Featherstone:

On _____, 1980, the Commission determined there was probable cause to believe that the National Rifle Association Political Victory Fund (NRA-PVF) and the National Rifle Association Institute For Legislative Action (NRA-ILA) committed a violation of § 441b(a) of the Federal Election Campaign Act of 1971, as amended, in connection with the payment of NRA-PVF's travel expenditures by the NRA-ILA.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District Court and seek payment of a civil penalty.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the U.S. Treasurer.

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ATTACHMENT II *aj*

Letter to James J. Featherstone
Page Two

If you have any questions or suggestions for changes
in the enclosed conciliation agreement, please contact Judy
Thedford, at 202-523-4057.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

84040454239

II pg 2


NATIONAL RIFLE ASSOCIATION OF AMERICA
INSTITUTE FOR LEGISLATIVE ACTION
1800 RHODES ISLAND AVENUE
WASHINGTON, D.C. 20036

REC 2321
RECEIVED
OFFICE OF THE
GENERAL COUNSEL

80 AUG 13 P 4: 44

August 13, 1980

General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1110

Dear Sir:

This is in response to your letter of June 16, 1980, in which you advised that after considering all the evidence available to the Commission, you are prepared to recommend that the Commission find probable cause to believe that a violation has occurred. The Commission had, on February 26, 1980, found reason to believe that the National Rifle Association Political Victory Fund and the National Rifle Association Institute for Legislative Action had violated the Federal Election Campaign Act of 1971, as amended, specifically 2 USC 441 b(a).

Your letter of June 16, 1980, also transmitted a brief stating your position on the legal and factual issues of the case which, in your words, is "focused on independent expenditure entries made to NRA-ILA by the NRA-PVF." The basic facts in the case were obtained from reports filed by the PVF in compliance with the Federal Election Campaign Act. Additional information was furnished in my letter to the Commission of March 28, 1980. Simply stated, the facts are:

On thirteen relevant occasions in 1978, ILA employees travelled to disseminate communications advocating the election or defeat of certain candidates. Their transportation expenses were reported as independent expenditures, since the expenditures were not made in consultation with, or with the cooperation of, any candidate. On two other occasions, ILA employees travelled to assist in the campaigns of two candidates and their transportation was paid for and reported as in-kind contributions. Travel arrangements had been made through a travel agency with which ILA maintained a charge account. ILA was billed in due course for this travel as well as for other travel undertaken by ILA employees on regular ILA business. ILA, in the regular course of business, paid the bills in their entirety and the PVF paid for the PVF travel by issuing a check to ILA.

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With one change, below is the chart taken from your brief which shows the cost of the PVF's share of travel expenses, the date ILA paid the travel agency, and the date of the PVF's payment to ILA for its share of travel expenses.

Cost of PVF's Travel	ILA Payment to Travel Agency	PVF Payment to NRA-ILA
\$312	11/13/78	02/13/79
312	11/13/78	02/13/79
120	11/13/78	02/13/79
226	11/13/78	02/13/79
312	11/13/78	02/13/79
312	11/13/78	02/13/79
*206	08/17/78 09/21/78	09/20/78
222	10/24/78	10/31/78
308	10/24/78	10/31/78
120	11/13/78	11/16/78
226	11/13/78	11/16/78
61	11/13/78	11/16/78
312	11/13/78	11/16/78
414	11/17/78	12/27/78
414	11/13/78	02/13/79

*The sum of \$1,738 appeared on your chart. The \$206 now on the chart represents the PVF travel expense paid by the ILA check issued on August 17, 1978. Since PVF paid ILA on September 20, 1978, the PVF travel expense in the amount of \$1,532 paid by the subsequently issued ILA check of September 21, 1978, has been eliminated. This is consistent with your determination with regard to printing costs on p. 4 of your memorandum, where PVF paid its share of the costs prior to the payment of the vendor by ILA.

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You are prepared to recommend, based on the foregoing, that the Commission find that ILA and PVF have violated 2 USC 441 b(a). The gravamen of the charge is that ILA used corporate funds to 1) make independent expenditures and 2) make in-kind contributions. The last two items on the chart are the in-kind contributions. As I understand the theory of your case, you have concluded that ILA loaned the PVF corporate money when it issued the checks in payment of the travel expenses listed on the above chart. Presumably, then, you would regard the loan as having been repaid when the PVF issued its check in payment of its share of the travel expenses reflected in the travel agency's bill.

Discussion

The applicable section of law, 2 USC 441 b(a) provides, in pertinent part:

(a) It is unlawful ... for any corporation whatever ... to make a contribution or expenditure in connection with any election at which ... a Senator or Representative in ... Congress are to be voted for, or in connection with any primary election ... held to select candidates for any of the foregoing offices, or for any ... political committee ... knowingly to accept or receive any contribution prohibited by this section...

(b) ...

(2) For purposes of this section, ... the term "contribution or expenditure" shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services or anything of value ... to any candidate, campaign committee, or political party or organization, in connection with any election to any of the offices referred to in this section; but shall not include -- ...

(c) the establishment, administration, and solicitation of contributions to a separate segregated fund to be utilized for political purposes by a corporation, ... membership organization ... or corporation without capital stock.

It is apparent from a reading of the definition of the term "contribution or expenditure" contained in 2 USC 441 b(a) that it does not include independent expenditures within its scope. The definition clearly confines itself to payments and loans to "any candidate, campaign committee, or political party or organization ..." The first thirteen expenditures

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Federal Election Commission

Page 4

August 13, 1980

listed above were made to a travel agency without the cooperation of, or consultation with, any candidate. Not being prohibited by 2 USC 441 b(a), since not made "to any candidate, campaign committee, or political party or organization ...", they cannot be regarded as producing an obligation on the part of PVF to repay them. It therefore follows that there was no loan made by ILA to PVF as there would have been had ILA distributed money to the PVF. This conclusion is not changed by virtue of the fact that PVF subsequently opted to pay for the independent expenditure travel. Had the PVF not paid for the travel, ILA still would not have been in violation of 2 USC 441 b(a).

The Commission obviously recognized that this conclusion is accurate and that 2 USC 441 b does not proscribe independent expenditures when it drafted section 114.1 of the Regulations which states, in pertinent part:

(a) For purposes of Part 114 ...

(1) The term "contribution or expenditure" shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value ... to any candidate, political party or committee, organization, or any other person in connection with any election to any of the offices referred to in §114.2(a) or (b) as applicable. (emphasis added)

The addition of the words "any other person" underlined above, is clearly an attempt to provide by regulation what the Congress failed to legislate.

It is by no means clear, moreover, that the Supreme Court would consider a ban on corporate independent expenditures to be constitutional. In Buckley v. Valeo, 96 S. Ct. 612(1976) the Supreme Court found that the independent expenditure ceiling imposed by former 18 USC 608(e)(1) heavily burdened core First Amendment expression and stated:

"Advocacy of the election or defeat of candidates for federal office is no less entitled to protection under the First Amendment than the discussion of political policy generally or advocacy of the passage or defeat of legislation." at 648.

The Court rejected the concept that government may restrict the speech of some elements of our society in order to enhance the relative voice of others. 96 S. Ct. at 649.

84040454243

August 13, 1980

Subsequently in First National Bank of Boston v. Bellotti, 96 S. Ct. 1407, (1978), the Supreme Court found unconstitutional a state statute which prohibited certain expenditures by banks and business corporations for the purpose of influencing the vote on referendum proposals, unless the proposals materially affect its business, property, or assets. The Court stated:

If the speakers here were not corporations, no one would suggest that the State could silence their proposed speech. It is the type of speech indispensable to decisionmaking in a democracy, and this is no less true because the speech comes from a corporation rather than an individual. The inherent worth of the speech in terms of its capacity for informing the public does not depend upon the identity of its source, whether corporation, association, union, or individual. 96 S. Ct. at 1416.

The Court went on to remark in footnote 26, that:

... our consideration of a corporation's right to speak on issues of general public interest implies no comparable right in the quite different context of participation in a political campaign for election to public office. Congress might well be able to demonstrate the existence of a danger of real or apparent corruption in independent expenditures by corporations to influence candidate elections. 96 S. Ct. at 1422.

It cannot be said with absolute certitude, therefore, that the Supreme Court would find unconstitutional a law prohibiting independent expenditures by corporations. It does appear clear, however, that the Supreme Court has recognized that the Congress has not as yet enacted such a law.

ADDITIONAL COMMENTS

In addition to the above discussion of the law applicable to this case, I believe the following observations are relevant:

1. The amount involved is de minimis. You allege loans of \$3,049 (independent expenditures) and \$828 (in-kind contributions), for a total of \$3,877. As I understand it under your theory of the case, the benefit to the PVF would be the interest it did not pay to ILA but would have been obligated to pay to another lender. As indicated in the enclosed letter from our accountants, LeStrange and LeStrange,

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Federal Election Commission

Page 6

August 13, 1980

the total interest involved for both the independent expenditures and the in-kind contributions would be \$70.42. The interest involved in the in-kind contributions alone would be \$5.44 and \$12.52, for a total of \$17.96.

2. The essential facts of this case appear on the face of the reports filed by the PVF. There is no evidence to suggest, and there is no basis for an allegation, that the PVF has acted other than in complete good faith. The PVF has been complete and open in its reporting and other practices.

3. The PVF balance during the time the transactions in question occurred was between \$568,565.63 and \$90,333.09, with an average cash balance of \$305,895.00, which constitutes a reductio ad absurdum of any suggestion that the PVF had a need to borrow ILA money for any purpose. The letter from LeStrange and LeStrange also reflects the computation of the average cash balance.

4. The practice used by ILA and PVF to pay the travel agency bills was a system with adequate internal accounting and administrative controls and was not at variance with generally accepted accounting principles. In fact, the system ensured that PVF money was prudently and properly spent and operated to prevent even the inadvertent commingling of PVF and ILA funds. Thus, all the payments in question, even when viewed in accordance with your theory of the case, amount to administrative support of the PVF by ILA, permitted under 2 USC 441 b (b)(C).

5. When the Commission first communicated with me in May 1979, concerning this matter, my initial reaction was basically as outlined in the previous comment. I, nonetheless, by way of accomodation, changed our system. As it now functions, ILA and PVF issue separate checks in payment of bills such as those in question. I was, therefore, more than mildly surprised when you advanced to the "reason to believe" stage and now contemplate a "probable cause to believe" recommendation. Since that time, I have had occasion to review a number of MUR's and it occurs to me that your treatment of this matter is at variance with your handling of other basically de minimis matters involving no intent to violate the law. In this connection please refer to MURs 1134, 1129, 1113, 1063, 1054, 1097, 1182, 1126, 1024, 1033, 1074.

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Federal Election Commission
Page 7
August 13, 1980

Conclusion

The General Counsel should recommend to the Commission that it find no probable cause to believe that a violation has occurred and that it close its file in this matter.

Sincerely,

James J. Featherstone
James J. Featherstone
General Counsel

JJF:jkm
Enclosure

84040454246

LESTRANGE AND LESTRANGE
CERTIFIED PUBLIC ACCOUNTANTS
ONE WEST DEER PARK ROAD
SUITE 403
GAITHERSBURG, MARYLAND 20760
TELEPHONE (301) 948-1033

KEVIN J. LESTRANGE, CPA

WILLIAM R. LESTRANGE, JR., CPA

MEMBERS:
AMERICAN INSTITUTE OF CPAs
MARYLAND ASSOCIATION OF CPAs

August 11, 1980

James J. Featherstone
Institute for Legislative Action
National Rifle Association
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

Dear Jim:

Enclosed herewith are the following schedules which have been prepared at your request for the N.R.A. Political Victory Fund:

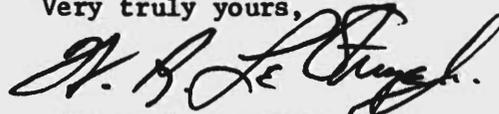
1. Analysis of Accrued Interest Expense on Travel Amounts Paid By ILA & Reimbursed by NRAPVF
2. Average Cash Balances for the Period August 1, 1978 to February 1, 1979

It is my understanding that the PVF is a separate fund of the Institute for Legislative Action (ILA). It is my further understanding that, on occasion, ILA has paid certain PVF travel bills that have been included on invoices rendered to ILA. All of the amounts that were paid by ILA on behalf of the PVF were reimbursed, as always, in the normal course of business. The PVF average cash balance during the period in question was \$305,895. This seems to offer a clear indication that the use of ILA funds was not done out of necessity, but simply for convenience purposes.

In a relationship such as the one between ILA and the PVF, it is not unusual for both entities to purchase goods and services from the same vendors. This is a very common practice that is used to take advantage of credit arrangements that have been established by the "parent" entity. This practice, used in a system with adequate internal accounting and administrative controls, certainly is not at variance with generally accepted accounting principles. Furthermore, your independent auditors, Touche Ross & Co., having made a study and evaluation of the system of internal accounting and administrative controls in connection with their examination of the financial statements of both entities, made no mention of this practice having any effect on the safeguarding of assets or the reliability of financial records for preparing financial statements and maintaining accountability for assets.

Please let me know if I may be of any further assistance.

Very truly yours,



William R. LeStrange, Jr.

WRL/hhh
Enclosures

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NRA POLITICAL VICTORY FUND
Analysis of Accrued Interest Expense
On Travel Amounts Paid by ILA & Reimbursed by NRPVF

<u>Travel Amount</u>	<u>Date Paid By ILA</u>	<u>Date Reimbursed by NRPVF</u>	<u>\$ of Days Outstanding</u>	<u>Accrued Interest @ 12%</u>
\$ 312.00	11-13-78	2-13-79	92	\$ 9.44
312.00	11-13-78	2-13-79	92	9.44
120.00	11-13-78	2-13-79	92	3.63
226.00	11-13-78	2-13-79	92	6.84
312.00	11-13-78	2-13-79	92	9.44
312.00	11-13-78	2-13-79	92	9.44
206.00	8-17-78	9-20-78	34	2.30
222.00	10-24-78	10-31-78	7	.51
308.00	10-24-78	10-31-78	7	.71
120.00	11-13-78	11-16-78	3	.12
226.00	11-13-78	11-16-78	3	.22
61.00	11-13-78	11-16-78	3	.06
312.00	11-13-78	11-16-78	3	.31
414.00	11-17-78	12-27-78	40	5.44
414.00	11-13-78	2-13-79	92	12.52
		<u>Total</u>		<u>\$ 70.42</u>

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NRA POLITICAL VICTORY FUND
Average Cash Balance
For the Period August 1, 1978 to February 1, 1979

<u>Date</u>	<u>Amount</u>		
August 1, 1978	\$ 568,565.63	x 31 Days	\$ 17,625,534.53
September 1, 1978	517,419.96	x 30 Days	15,522,598.80
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January 1, 1979	89,158.49	x 31 Days	2,763,913.19
February 1, 1979	90,333.09	x 29 Days	2,619,659.61
		213 Days	\$ 65,155,569.86
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			<u>213 Days</u>
<u>AVERAGE CASH BALANCE</u>			<u>\$ 305,894.69</u>

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 31, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James J. Featherstone
General Counsel
National Rifle Association Political
Victory Fund
P.O. Box 2019
Washington, DC 20013

RE: MUR 1110

Dear Mr. Featherstone:

This is in response to your letter of July 21, 1980, in which you request an extension of time in which to file a responsive brief in connection with the above-referenced matter.

On July 29, 1980, the Commission voted to deny your request for an extension until August 25, 1980. However, the Commission has voted to grant you an extension until August 13, 1980 in which to file a responsive brief.

Sincerely,

Charles N. Steele
General Counsel

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PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete Items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
 Show to whom and date delivered.....
 Show to whom, date, and address of delivery.....
 RESTRICTED DELIVERY
 Show to whom and date delivered.....
 RESTRICTED DELIVERY
 Show to whom, date, and address of delivery. \$ ____
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
James Littleton
PO Box 209 SC

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>445673</i>	

 (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
[Signature]

4. DATE OF DELIVERY
[Signature]

5. ADDRESS (Complete only if requested)
 WASHINGTON, DC
 AUG 14 1980
 BOX SECTION M.O.

6. UNABLE TO DELIVER BECAUSE:
 CLERK'S INITIALS

☆GPO 1977-0-248-586

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James J. Featherstone
General Counsel
National Rifle Association Political
Victory Fund
P.O. Box 2019
Washington, DC 20013

RE: MUR 1110

Dear Mr. Featherstone:

This is in response to your letter of July 21, 1980, in which you request an extension of time in which to file a responsive brief in connection with the above-referenced matter.

On July , 1980, the Commission voted to deny your request for an extension until August 25, 1980. However, the Commission has voted to grant you an extension until August 13, 1980 in which to file a responsive brief.

Sincerely,

Charles N. Steele
General Counsel

84040454252

JA
7-30-80

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
National Rifle Association Political)	MUR 1110
Victory Fund)	
National Rifle Association Institute)	
For Legislative Action)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on July 29, 1980, the Commission decided by a vote 6-0 to take the following actions regarding MUR 1110:

1. Deny Mr. Featherstone's request for an extension of time in which to file a responsive brief until August 25, 1980.
2. Approve an extension until August 13, 1980.
3. Send the notification letter, as attached to the General Counsel's July 25, 1980 memorandum, to the respondents' counsel.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

7/29/80
Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

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Please keep the attached item distributed by
Commission on a 48 hour belly basis. Thank you.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 JUL 25 AIO: 34

July 25, 1980

MEMORANDUM TO: The Commission
FROM: Charles N. Steele *CNS*
General Counsel
SUBJECT: MUR 1110 - Request For An Extension of Time

On July 21, 1980, the Office of the General Counsel received a request from James Featherstone for an extension of time in which to file a responsive brief in connection with MUR 1110, the National Rifle Association Political Victory Fund and the National Rifle Association Institute For Legislative Action (see Attachment I).

Mr. Featherstone received the General Counsel's Brief on July 8, 1980; therefore his response was due July 23, 1980. Mr. Featherstone has requested an extension until August 25, 1980

While this office feels that a one month extension request is excessive, it is recommended that Mr. Featherstone be granted an extension until August 13, 1980.

RECOMMENDATION:

It is recommended that the Commission:

- 1) Deny Mr. Featherstone's request for an extension of time in which to file a responsive brief until August 25, 1980;
- 2) Approve an extension until August 13, 1980; and
- 3) Send the attached notification letter to the respondents' counsel.

Attachments:

- I - Featherstone Letter 7/21/80
- II - Proposed Letter

84040454255

Thedford



NRA Political Victory Fund

Institute for Legislative Action
P.O. Box 2019, Washington, D.C. 20013

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

JUL 21 P 4: 13

July 21, 1980

Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1110

Dear Mr. Steele:

Reference is made to your letter of June 16, 1980, which advised that the Office of General Counsel of the Federal Election Commission is prepared to recommend that the Commission find probable cause to believe that a violation of 2U.S.C. §441b(a) has occurred.

Your letter was received in our office on July 8, 1980. Our reply would therefore be due in your office on July 23, 1980. As I understand from a telephone conversation with Judy Thedford, your letter was so long in transit because it had been sent to the incorrect address.

The purpose of this letter is to seek your agreement to an extension of our time to reply until August 25, 1980. I consider this to be a reasonable period of time in view of the fact that you had approximately seventy-five days to consider my letter of March 31, 1980, to which your letter of June 16, 1980, was in reply. This is apart from any consideration of the approximately twenty-two days it took for delivery of your letter. Further, because of the urgency of other matters related to my duties as General Counsel of the National Rifle Association, I have been unable to consider the issues raised in your June 16, 1980, letter.

Your cooperation in this matter is appreciated.

Sincerely,

James J. Featherstone
James J. Featherstone
General Counsel

JJF:blh

ATTACHMENT I

84040454256



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James J. Featherstone
General Counsel
National Rifle Association Political
Victory Fund
P.O. Box 2019
Washington, DC 20013

RE: MUR 1110

Dear Mr. Featherstone:

This is in response to your letter of July 21, 1980, in which you request an extension of time in which to file a responsive brief in connection with the above-referenced matter.

On July , 1980, the Commission voted to deny your request for an extension until August 25, 1980. However, the Commission has voted to grant you an extension until August 13, 1980 in which to file a responsive brief.

Sincerely,

Charles N. Steele
General Counsel

ATTACHMENT II

84040454257

**NRA Political Victory Fund
P.O. Box 2019
Washington, D.C. 20013**

8 1 0 4 0 4 5 4 2 3

**Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463**

Attention: Ms. Judy Thedford

Hand Delivered



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY
DATE: JULY 7, 1980
SUBJECT: MUR 1110 Interim Investigative Report #3

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 3:00 p.m. on July 3, 1980.

There were no objections to the above-named report as of 3:00 p.m. July 7, 1980.

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MEMORANDUM FOR THE DIRECTOR, FBI
FROM: SAC, [illegible]
SUBJECT: [illegible]

Please have the attached Internal Investigation
Report on [illegible] distributed to the Consulate
of [illegible] on [illegible] basis.

Very truly,
[illegible]

BEFORE THE FEDERAL ELECTION COMMISSION
July 1, 1980

In the Matter of)
)
National Rifle Association Political)
Victory Fund (NRA-PVF)) MUR 1110
National Rifle Association Institute)
For Legislative Action (NRA-ILA))

INTERIM INVESTIGATIVE REPORT #3

On June 16, 1980, a General Counsel's Brief was sent to the respondents for reply. The respondents have fifteen days in which to file their responsive brief; the fifteen days expires July 4, 1980.

Upon receipt of the respondents' brief, the brief will be reviewed and a report presented to the Commission.

Date: 2 July 1980



Charles N. Steele
General Counsel

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 16, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James Featherstone
1800 Rhode Island Avenue, N.W.
Washington, D.C. 20013

Re: MUR 1110

Dear Mr. Featherstone:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on February 26, 1980, found reason to believe that the National Rifle Association Political Victory Fund and the National Rifle Association Institute for Legislative Action violated the Federal Election Campaign Act of 1971, as amended, specifically 2 U.S.C. § 441b(a), and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel). The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

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Letter to: James Featherstone
Page: Two

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Judy Thedford at (202)523-5071.

Sincerely

Charles N. Steele
General Counsel

Enclosure

Brief

84040454264

MAILING LABEL

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
 Show to whom and date delivered.....
 Show to whom, date, and address of delivery.....
 RESTRICTED DELIVERY
Show to whom and date delivered.....
 RESTRICTED DELIVERY
Show to whom, date, and address of delivery.....
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
*James Featherstone
1600 Rhode Island Ave
Washington, DC 20031*

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
SPHSHB

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE: Addressee Authorized agent
[Signature]

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
WASHINGTON, DISTRICT OF COLUMBIA
OCT 1 1977
STREET
INITIALS

PER. NO. 2020-1977-8-248-001

Thedford

MEMORANDUM FOR THE RECORD
DATE: 11/11/54
SUBJECT: [Illegible]

Please have the attached memo and brief distributed to the Commission on an informational basis. Thank you.

84040



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 JUN 16 P 4: 01

June 16, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel *CS*

SUBJECT: MUR 1110

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on June 16 1980. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments:

1. Brief
2. Letter to Respondent

84040454266

BEFORE THE FEDERAL ELECTION COMMISSION

May 5, 1980

In the Matter of

National Rifle Association Political
Victory Fund
National Rifle Association Institute
For Legislative Action

)
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MUR 1110

GENERAL COUNSEL'S BRIEF

I. Statement of the Case:

On February 26, 1980, the Commission found reason to believe that the National Rifle Association Political Victory Fund (NRA-PVF) and the National Rifle Association Institute For Legislative Action (NRA-ILA) violated 2 U.S.C. § 441b(a). These findings were based on information forwarded to the Office of General Counsel by the Reports Analysis Division. The information focused on independent expenditure entries made to NRA-ILA by the NRA-PVF. The Reports Analysis Division had previously questioned the NRA-PVF concerning entries totalling \$1,932.75 and forwarded additional entries totalling \$3,815 which it had not previously pursued.

II. Evidence

Mr. Featherstone, treasurer of the NRA-PVF initially responded to the reason to believe notification by phone and

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subsequently met with Commission employees on March 12, 1980. On March 31, 1980, a written response was submitted by Mr. Featherstone (see Attachment I). 1/ Mr. Featherstone's response presented a detailed account of each independent expenditure made payable to the NRA-ILA. Of the sixteen entries in question, fifteen entries involved the payment of travel expenses to the NRA-ILA by the NRA-PVF and one entry involved the payment of printing costs to the NRA-ILA by the NRA-PVF.

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The information submitted by Mr. Featherstone indicates that the NRA-PVF travel expenses were for travel to disseminate communications which advocated the election or defeat of certain federal candidates and for travel to assist in federal candidates' campaigns. With respect to travel expenses, Mr. Featherstone's response revealed that the NRA-ILA maintained an account for its corporate travel with the Beeson Travel Agency, that the NRA-PVF used the same travel agency for its political travel, and that the NRA-PVF travel expenses were charged to the NRA-ILA account. Subsequently, the NRA-ILA would receive various invoices from the travel agency for its travel as well as the travel of the NRA-PVF. The NRA-ILA would pay the invoices submitted to it by the Beeson Travel Agency and, sometime thereafter, the NRA-PVF would reimburse the NRA-ILA for its share of the travel expenses.

Below is a chart showing the cost of NRA-PVF's share of

1/ Mr. Featherstone's response incorrectly reflected that the travel, relating to expenditures numbered 1, 2, 3, and 5 in the response, took place in 1979. It should be noted that the travel occurred in 1978.

travel expenses, the date the NRA-ILA paid the travel agency, and the date of NRA-PVF's payment to the NRA-ILA for its share of travel expenses.

Cost of PVF's Travel	ILA Payment to Travel Agency	PVF Payment to NRA-ILA
\$312	11/13/78	02/13/79
312	11/13/78	02/13/79
120	11/13/78	02/13/79
226	11/13/78	02/13/79
312	11/13/78	02/13/79
312	11/13/78	02/13/79
1,738	08/17/78 09/21/78	09/20/78
222	10/24/78	10/31/78
308	10/24/78	10/31/78
120	11/13/78	11/16/78
226	11/13/78	11/16/78
61	11/13/78	11/16/78
312	11/13/78	11/16/78
414	11/17/78	12/27/78
414	11/13/78	02/13/79

As shown by the chart, the time between NRA-ILA's payment of the invoices and NRA-PVF's reimbursement to the NRA-ILA ranged from three days to three months.

The one non-travel expenditure paid to the NRA-ILA by the NRA-PVF was for the cost of printing postcards which advocated the defeat of a federal candidate and totalled \$438.75.

Mr. Featherstone's response indicated that the NRA-ILA regularly

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used the services of National Creative Printing to perform printing services; that the NRA-PVF used the same vendor for its printing; and that the charges for NRA-PVF's printing were included on an invoice to NRA-ILA. The NRA-PVF paid the NRA-ILA for its share of printing costs on December 11, 1978. The NRA-ILA paid the total invoice charge the following day, December 12, 1978.

III. Legal Analysis

The evidence submitted by Mr. Featherstone indicates that NRA-ILA violated 2 U.S.C. § 441b(a). Specifically, it appears that the NRA-ILA by using corporate funds to pay for the NRA-PVF's travel expenses to disseminate communications which advocated the election or defeat of certain federal candidates and to assist in federal candidates' campaigns, made expenditures in connection with federal elections, 2 U.S.C. § 441b(b)(2).

As the NRA-PVF paid the NRA-ILA for its share of travel expenses three days to three months after NRA-ILA paid the travel agent and the NRA-PVF was aware of the NRA-ILA's payment of these travel expenses, the NRA-PVF has accepted illegal corporate contributions from its connected organization, NRA-ILA.

The one non-federal expenditure of \$438.75 paid to the NRA-ILA for printing costs does not appear to be in violation of the § 441b(a) since the NRA-PVF paid for its share of printing costs billed to NRA-ILA prior to the NRA-ILA's payment of the vendor invoice.

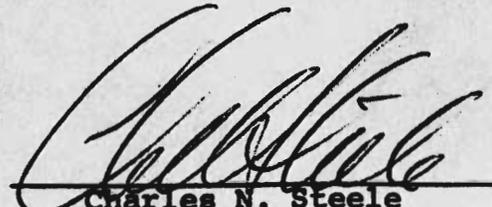
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Mr. Featherstone has stated the NRA-PVF willingness to revise its bookkeeping procedures to comply with the Act and Regulations.

IV. Recommendation

Find probable cause to believe that the National Rifle Association Political Victory Fund and the National Rifle Association Institute For Legislative Action violated 2 U.S.C. § 441b(a).

13 June 1980
Date


Charles N. Steele
General Counsel

ATTACHMENTS:

I - Response from Featherstone 3/28/80

84040454271



NRA Political Victory Fund

Institute for Legislative Action
P.O. Box 2019, Washington, D.C. 20013

HAND DELIVERED

RECEIVED

80 MAR 31 P2: 01

March 28, 1980

007222

Federal Election Commission
1325 K Street, NW
Washington, DC 20463

RE: MUR 1110

80 MAR 31 P2: 56

GENERAL COUNSEL

Dear Sirs:

Reference is made to your letter of March 5, 1980, which advised that you had found reason to believe that the National Rifle Association Institute for Legislative Action may have violated 2 U.S.C. 441b(a) of the Federal Election Campaign Act of 1971, as amended. Your letter transmitted a copy of a Notification of Reason to Believe Finding. Reference is also made to my letter of May 31, 1979, which discussed some of the expenditures mentioned in the Notification, all of which had been previously reported to the Commission on FEC Form 3. The Notification, on page 2, refers to independent expenditures totalling \$1,932.75, and on page 3 to independent expenditures totalling \$3,815.

Concerning these expenditures, consisting of checks drawn to the order of NRA-ILA, the following information is offered.

Page Two Checks -- \$1,932.75

1. NRA-PVF check No. 1538, dated February 13, 1979, in the sum of \$312.

As reported in our March 1979, Monthly Report and in my letter of May 31, 1979, this expenditure was for travel on October 25, 1979, to disseminate communications advocating the defeat of Abner Mikva, a candidate for reelection in the 10th Congressional District of Illinois. By check dated November 13, 1978, NRA-ILA had paid the Beeson Travel Bureau, 2011 Eye Street, N.W., Washington, D.C., the sum of \$5,189.00, in payment of various invoices submitted by that firm. One of the invoices was for \$312, for travel to and from Chicago by NRA employees. ILA maintains an account at the Beeson Travel Bureau.

2. NRA-PVF check No. 1539, dated February 13, 1979, in the sum of \$312.

As reported in our March 19, 1979, Monthly Report and in my letter of May 31, 1979, this expenditure was for travel on October 18-19, 1979, to disseminate communications advocating the defeat of Abner Mikva. The further explanation applicable to check No. 1538 applies also to this check.

3. NRA-PVF check No. 1541, dated February 13, 1979, in the sum of \$120.

ATTACHMENT I pg 1

84040454272

As reported in our March 1979, Monthly Report and in my letter of May 31, 1979, this expenditure was for travel on October 23, 1979, to disseminate communications advocating the defeat of John Buckley, a candidate in the Fifth Congressional District of Massachusetts. The further explanation applicable to the foregoing two checks applies also to this check.

4. NRA-PVF check No. 1542 dated February 13, 1979, in the sum of \$226.

As reported in our March 1979, Monthly Report and in my letter of May 31, 1979, this expenditure was for travel on October 30 - November 1, 1978, to disseminate communications advocating the election of Douglas Bereuter, a candidate for election from the First Congressional District of Nebraska. The further explanation applicable to the foregoing three checks applies also to this check.

5. NRA-PVF check No. 1543 dated February 13, 1979, in the sum of \$312.

As reported in our March 1979, Monthly Report and in my letter of May 31, 1979, this expenditure was for travel on October 30 - November 6, 1979, to disseminate communications advocating the defeat of Abner Mikva. The further explanation applicable to the foregoing four checks applies also to this check.

6. NRA-PVF check No. 1544 dated February 13, 1979, in the sum of \$312.

As reported in our March 1979, Monthly Report and in my letter of May 31, 1979, this expenditure was for travel on October 24 - 26, 1978, to disseminate communications advocating the election of Douglas Bereuter. The further explanation applicable to the foregoing five checks applies also to this check.

7. NRA-PVF check No. 1494 dated December 11, 1978, in the sum of \$438.75.

This expenditure was for the cost of a communication, a postcard, advocating the defeat of Abner Mikva. This expenditure was reported in our January 31, Annual Report filed January 31, 1979. NRA-ILA, on December 12, 1978, had issued a check in the sum of \$16,233.80 to National Creative Printing, a vendor then regularly used by NRA-ILA to perform printing services. All the other charges on this invoice were paid by NRA-ILA as they were for communications to NRA members.

Page Three Checks -- \$3,815.00

8. NRA-PVF check No. 1185 dated September 20, 1978, in the sum of \$1,738.

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This expenditure was reported in our September 1978, Monthly Report. It was for travel to and from Minnesota to disseminate communications advocating the defeat of Donald Fraser, a candidate in the Democratic Senatorial Primary Election. This amount was paid by NRA-ILA when it issued checks to the Beeson Travel Bureau in the sum of \$594.00 on August 17, 1978, and the sum of \$2,219 on September 21, 1978.

9. NRA-PVF check No. 1337 dated October 31, 1978, in the sum of \$222.

This expenditure was reported in our Thirtieth Day Report Following the General Election, dated December 7, 1978. It was for travel on September 27 - 28, 1978, to disseminate communications advocating the election of Douglas Bereuter. This amount was paid by NRA-ILA when it issued a check to the Beeson Travel Bureau on October 24, 1978, in the sum of \$3,412.00.

10. NRA-PVF check No. 1338 dated October 31, 1978, in the sum of \$308.

This expenditure was reported in our Thirtieth Day Report Following the General Election, dated December 7, 1978. It was for travel on October 9 - 13, 1978, to disseminate communications advocating the election of Douglas Bereuter. The further explanation applicable to check No. 1437 applies also to this check.

11. NRA-PVF check No. 1434 dated November 16, 1978, in the sum of \$120.

This expenditure was reported in our Thirtieth Day Report Following the General Election. It was for travel on October 31 - November 5, 1978 to disseminate communications advocating the defeat of John Buckley. This amount was paid by NRA-ILA when it issued a check in the sum of \$5,189.00 to Beeson Travel Bureau on November 13, 1978.

12. NRA-PVF check No. 1435 dated November 16, 1978, in the sum of \$226.

This expenditure was reported in our Thirtieth Day Report Following the General Election. It was for travel from November 5 - 7, 1978, to disseminate communications advocating the election of Douglas Bereuter. The further explanation applicable to check No. 1434 applies also to this check.

13. NRA-PVF check No. 1436 dated November 16, 1978, in the sum of \$61.

This expenditure was reported in our Thirtieth Day Report Following the General Election. It was for travel on November 2 - 5, 1978, to disseminate communications advocating the defeat of Abner Mikva. The further explanation applicable to check No. 1435 applies also to this check.

14. NRA-PVF check No. 1432 dated November 16, 1978, in the sum of \$312.

The explanation applicable to check No. 1436 applies also to this check.

15. NRA-PVF check No. 1511 dated December 27, 1978, in the sum of \$414.

This expenditure was an in-kind contribution to Mark W. Hannaford, a candidate for reelection in California's 34th Congressional District and was for travel to assist in his campaign. It was reported in our January 31, Annual Report dated January 31, 1979. NRA-ILA paid this amount when it issued a check dated November 17, 1978, to the Beeson Travel Bureau in the sum of \$1,673.00.

16. NRA-PVF check No. 540 dated February 13, 1979, in the sum of \$414.

This expenditure was an in-kind contribution to Wayne Grisham, a candidate in California's 33rd Congressional District and was for travel to assist in his campaign. It was reported in our February 1979 Monthly Report. This amount was paid by NRA-ILA when it issued a check on November 13, 1978, in the sum of \$5,189.00 to the Beeson Travel Bureau.

Comment

Before an employee of NRA-ILA travels on ILA business, a Travel Authorization must be signed by the Director of the Division to which he is assigned. The Travel Authorization must then be approved by the Fiscal Officer. The traveller makes his air reservation through the travel agent with which ILA maintains an account. (During the relevant time period it was the Beeson Travel Bureau.). The travel agent delivers the ticket to the Accounts Payable Clerk who gives it to the traveller upon presentation of his Travel Authorization. The travel agent bills NRA-ILA on a monthly basis. Travel Authorizations are placed with the relevant bills as a justification for payment before a check is issued to the Travel Bureau.

When an NRA-ILA employee travels on PVF business, he makes his reservation as above and NRA-ILA routinely pays the travel agent's bills. The traveller is also subject to the same NRA-ILA administrative controls as if he travelled on ILA business, including the audit of his voucher by NRA-ILA's Fiscal Officer. As indicated in the foregoing discussion of specific checks, NRA-PVF reimburses NRA-ILA to ensure that no corporate funds are used in connection with a federal election.

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In my view, when the NRA-PVF purchases from vendors regularly used by NRA-ILA, and when it utilizes credit arrangements previously established by NRA-ILA, it is not the beneficiary of a contribution or an expenditure since those terms, under the provisions of 2 U.S.C. 441 b(b) do not include administrative support of a separate segregated fund. It would appear that one of the purposes of that section is to relieve the corporation establishing such a fund not only from the burdens of hiring a separate set of employees and providing separate office space and equipment to run the separate segregated fund, or somehow allocating the costs between the corporation and the fund, but also from the burdens of duplicating such administrative procedures as those involving the travel and printing expenses outlined above.

If you have any views to the contrary, I would appreciate being advised of them. We can, of course, make changes in our procedures to accommodate your wishes. From our point of view, however, it would be preferable not to have separate PVF and ILA accounts with our vendors. In fact, inadvertent comingling of PVF and ILA funds may be more likely with such a system since the segregation of funds would not then depend on internal fiscal control but could be affected by the mistakes of vendors, purchasing agents and employees.

I am, of course, available to discuss this matter further with Miss Judy Thedford.

I await your advices in due course.

Sincerely,

James J. Featherstone
James J. Featherstone
Treasurer

JJF:mem

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 16, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James Featherstone
1800 Rhode Island Avenue, N.W.
Washington, D.C. 20013

Re: MUR 1110

Dear Mr. Featherstone:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on February 26, 1980, found reason to believe that the National Rifle Association Political Victory Fund and the National Rifle Association Institute for Legislative Action violated the Federal Election Campaign Act of 1971, as amended, specifically 2 U.S.C. § 441b(a), and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel). The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

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Letter to: James Featherstone
Page: Two

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Judy Theford at (202)523-5071.

Sincerely

Charles N. Steele
General Counsel

Enclosure

Brief

84040454278

POSTAL SERVICE IS REQUESTED (check one)

Show to whom and date delivered

Show to whom, date, and address of delivery

RESTRICTED DELIVERY
Show to whom and date delivered

RESTRICTED DELIVERY
Show to whom, date, and address of delivery

(CONSULT POSTMASTER FOR FEES)

ARTICLE ADDRESSED TO:
James Featherstone

ARTICLE DESCRIPTION:
REGISTERED NO. *50* CERTIFIED NO. *945170* INSURED NO.

Always obtain signature of addressee or agent

I have received the article described above.

SIGNATURE Addressee Authorized agent
James Featherstone

DATE OF DELIVERY

5. ADDRESS (Complete only if changed)

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RECEIVED JUN 1 1980



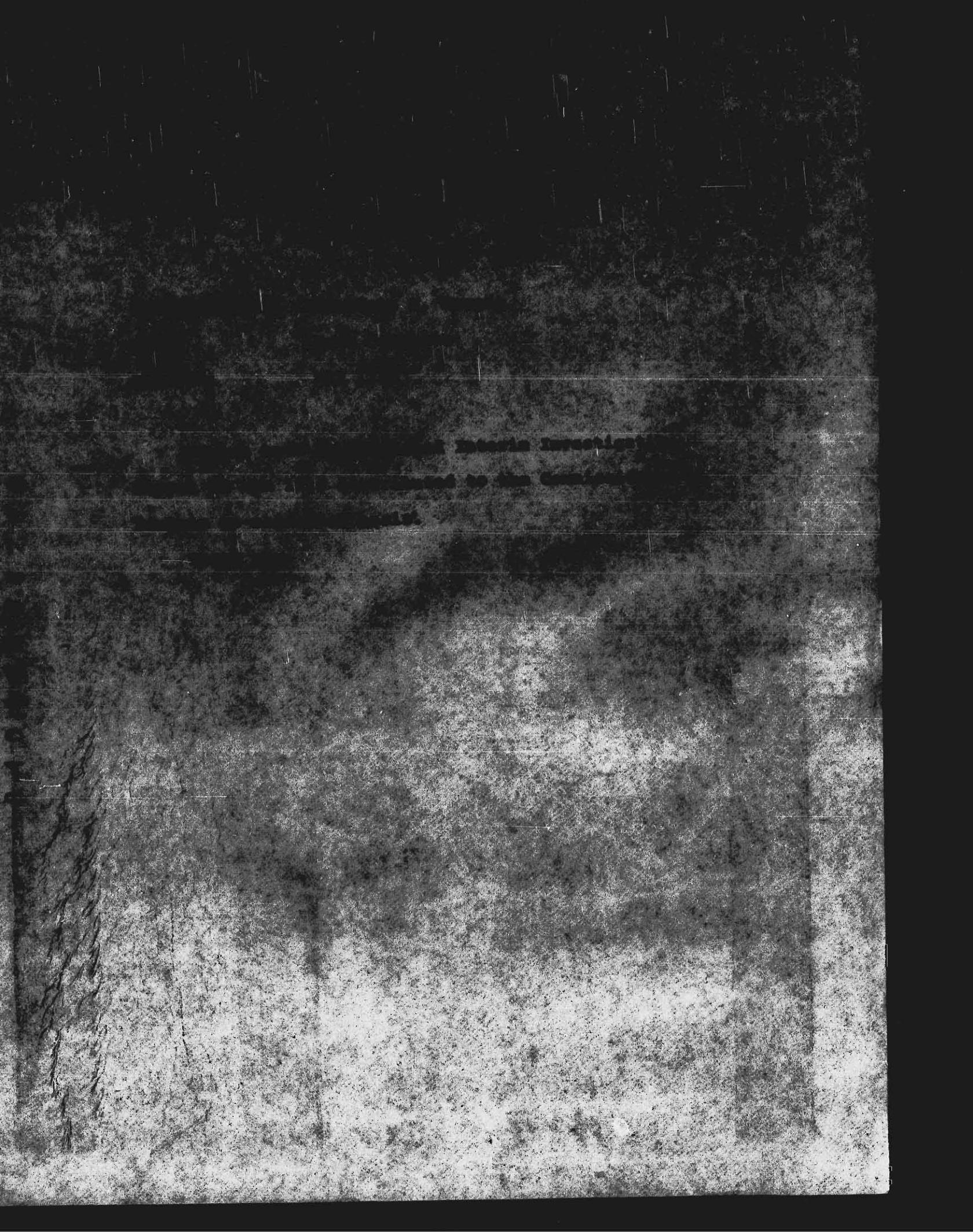
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS, MARGARET CHANEY *mc*
DATE: JUNE 3, 1980
SUBJECT: MUR 1110 - Interim Investigative Report #2,
dated 5-29-80; Signed 5-30-80; Received
in OCS 6-2-80, 11:02

The above-named document was circulated to the
Commission on a 24 hour no-objection basis at 4:00,
June 2, 1980.

There were no objections to the Interim Investigative
Report at the time of the deadline.

84040454279



RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION
May 29, 1980

JUN 2 11:08

In the Matter of)
)
National Rifle Association Political) MUR 1110
Victory Fund (NRA-PVF))
National Rifle Association Institute)
Pro Legislative Action)

INTERIM INVESTIGATIVE REPORT #2

On March 31, 1980, the respondents submitted a detailed response concerning independent expenditures entries reported by the NRA-PVF and made payable to the NRA-ILA. The response has been reviewed and analyzed, and a General Counsel's Brief has been prepared.

DATE: 30 May 1980



Charles N. Steele
General Counsel

84040454281





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: MARCH 31, 1980
SUBJECT: MUR 1110 - Interim Investigative Report #1,
dated 3-27-80; Received in OCS 3-28-80,
10:28

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 2:00, March 28, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline.

84040454282

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Please have the attached report
submitted to the Controller. Thank you.

BEFORE THE FEDERAL ELECTION COMMISSION
March 27, 1980

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 MAR 28 10: 28

In the Matter of)
)
National Rifle Association Political)
Victory Fund (NRA-PVF))
National Rifle Association Institute)
For Legislative Action (NRA-ILA))

MUR 1110

INTERIM INVESTIGATIVE REPORT #1

On March 11, 1980, Mr. Featherstone, treasurer of the NRA-PVF, phoned the Commission inquiring into the reason to believe notifications received by the NRA-PVF and the NRA-ILA. On March 12, 1980, Commission staff members met with Mr. Featherstone to discuss the Commission's findings. Mr. Featherstone stated he would respond to the reason to believe findings.

Upon receipt of the response from Mr. Featherstone, a report will be presented to the Commission.

84040454284

27 March 1980
Date



Charles N. Steele
General Counsel



NRA
Political Victory Fund

Institute for Legislative Action
P.O. Box 2019, Washington, D.C. 20013

March 28, 1980

HAND DELIVERED

RECEIVED

80 MAR 31 2:09

907222

Federal Election Commission
1325 K Street, NW
Washington, DC 20463

RE: MUR 1110

80 MAR 31 2:58
RECEIVED
GENERAL COUNSEL

Dear Sirs:

Reference is made to your letter of March 5, 1980, which advised that you had found reason to believe that the National Rifle Association Institute for Legislative Action may have violated 2 U.S.C. 441b(a) of the Federal Election Campaign Act of 1971, as amended. Your letter transmitted a copy of a Notification of Reason to Believe Finding. Reference is also made to my letter of May 31, 1979, which discussed some of the expenditures mentioned in the Notification, all of which had been previously reported to the Commission on FEC Form 3. The Notification, on page 2, refers to independent expenditures totalling \$1,932.75, and on page 3 to independent expenditures totalling \$3,815.

Concerning these expenditures, consisting of checks drawn to the order of NRA-ILA, the following information is offered.

Page Two Checks -- \$1,932.75

1. NRA-PVF check No. 1538, dated February 13, 1979, in the sum of \$312.

As reported in our March 1979, Monthly Report and in my letter of May 31, 1979, this expenditure was for travel on October 25, 1979, to disseminate communications advocating the defeat of Abner Mikva, a candidate for reelection in the 10th Congressional District of Illinois. By check dated November 13, 1978, NRA-ILA had paid the Beeson Travel Bureau, 2011 Eye Street, N.W., Washington, D.C., the sum of \$5,189.00, in payment of various invoices submitted by that firm. One of the invoices was for \$312, for travel to and from Chicago by NRA employees. ILA maintains an account at the Beeson Travel Bureau.

2. NRA-PVF check No. 1539, dated February 13, 1979, in the sum of \$312.

As reported in our March 19, 1979, Monthly Report and in my letter of May 31, 1979, this expenditure was for travel on October 18-19, 1979, to disseminate communications advocating the defeat of Abner Mikva. The further explanation applicable to check No. 1538 applies also to this check.

3. NRA-PVF check No. 1541, dated February 13, 1979, in the sum of \$120.

84040454295

As reported in our March 1979, Monthly Report and in my letter of May 31, 1979, this expenditure was for travel on October 23, 1979, to disseminate communications advocating the defeat of John Buckley, a candidate in the Fifth Congressional District of Massachusetts. The further explanation applicable to the foregoing two checks applies also to this check.

4. NRA-PVF check No. 1542 dated February 13, 1979, in the sum of \$226.

As reported in our March 1979, Monthly Report and in my letter of May 31, 1979, this expenditure was for travel on October 30 - November 1, 1978, to disseminate communications advocating the election of Douglas Bereuter, a candidate for election from the First Congressional District of Nebraska. The further explanation applicable to the foregoing three checks applies also to this check.

5. NRA-PVF check No. 1543 dated February 13, 1979, in the sum of \$312.

As reported in our March 1979, Monthly Report and in my letter of May 31, 1979, this expenditure was for travel on October 30 - November 6, 1979, to disseminate communications advocating the defeat of Abner Mikva. The further explanation applicable to the foregoing four checks applies also to this check.

6. NRA-PVF check No. 1544 dated February 13, 1979, in the sum of \$312.

As reported in our March 1979, Monthly Report and in my letter of May 31, 1979, this expenditure was for travel on October 24 - 26, 1978, to disseminate communications advocating the election of Douglas Bereuter. The further explanation applicable to the foregoing five checks applies also to this check.

7. NRA-PVF check No. 1494 dated December 11, 1978, in the sum of \$438.75.

This expenditure was for the cost of a communication, a postcard, advocating the defeat of Abner Mikva. This expenditure was reported in our January 31, Annual Report filed January 31, 1979. NRA-ILA, on December 12, 1978, had issued a check in the sum of \$16,233.80 to National Creative Printing, a vendor then regularly used by NRA-ILA to perform printing services. All the other charges on this invoice were paid by NRA-ILA as they were for communications to NRA members.

Page Three Checks -- \$3,815.00

8. NRA-PVF check No. 1185 dated September 20, 1978, in the sum of \$1,738.

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This expenditure was reported in our September 1978, Monthly Report. It was for travel to and from Minnesota to disseminate communications advocating the defeat of Donald Fraser, a candidate in the Democratic Senatorial Primary Election. This amount was paid by NRA-ILA when it issued checks to the Beeson Travel Bureau in the sum of \$594.00 on August 17, 1978, and the sum of \$2,219 on September 21, 1978.

9. NRA-PVF check No. 1337 dated October 31, 1978, in the sum of \$222.

This expenditure was reported in our Thirtieth Day Report Following the General Election, dated December 7, 1978. It was for travel on September 27 - 28, 1978, to disseminate communications advocating the election of Douglas Bereuter. This amount was paid by NRA-ILA when it issued a check to the Beeson Travel Bureau on October 24, 1978, in the sum of \$3,412.00.

10. NRA-PVF check No. 1338 dated October 31, 1978, in the sum of \$308.

This expenditure was reported in our Thirtieth Day Report Following the General Election, dated December 7, 1978. It was for travel on October 9 - 13, 1978, to disseminate communications advocating the election of Douglas Bereuter. The further explanation applicable to check No. 1437 applies also to this check.

11. NRA-PVF check No. 1434 dated November 16, 1978, in the sum of \$120.

This expenditure was reported in our Thirtieth Day Report Following the General Election. It was for travel on October 31 - November 5, 1978 to disseminate communications advocating the defeat of John Buckley. This amount was paid by NRA-ILA when it issued a check in the sum of \$5,189.00 to Beeson Travel Bureau on November 13, 1978.

12. NRA-PVF check No. 1435 dated November 16, 1978, in the sum of \$226.

This expenditure was reported in our Thirtieth Day Report Following the General Election. It was for travel from November 5 - 7, 1978, to disseminate communications advocating the election of Douglas Bereuter. The further explanation applicable to check No. 1434 applies also to this check.

13. NRA-PVF check No. 1436 dated November 16, 1978, in the sum of \$61.

This expenditure was reported in our Thirtieth Day Report Following the General Election. It was for travel on November 2 - 5, 1978, to disseminate communications advocating the defeat of Abner Mikva. The further explanation applicable to check No. 1435 applies also to this check.

84040454287

14. NRA-PVF check No. 1432 dated November 16, 1978, in the sum of \$312.

The explanation applicable to check No. 1436 applies also to this check.

15. NRA-PVF check No. 1511 dated December 27, 1978, in the sum of \$414.

This expenditure was an in-kind contribution to Mark W. Hannaford, a candidate for reelection in California's 34th Congressional District and was for travel to assist in his campaign. It was reported in our January 31, Annual Report dated January 31, 1979. NRA-ILA paid this amount when it issued a check dated November 17, 1978, to the Beeson Travel Bureau in the sum of \$1,673.00.

16. NRA-PVF check No. 540 dated February 13, 1979, in the sum of \$414.

This expenditure was an in-kind contribution to Wayne Grisham, a candidate in California's 33rd Congressional District and was for travel to assist in his campaign. It was reported in our February 1979 Monthly Report. This amount was paid by NRA-ILA when it issued a check on November 13, 1978, in the sum of \$5,189.00 to the Beeson Travel Bureau.

Comment

Before an employee of NRA-ILA travels on ILA business, a Travel Authorization must be signed by the Director of the Division to which he is assigned. The Travel Authorization must then be approved by the Fiscal Officer. The traveller makes his air reservation through the travel agent with which ILA maintains an account. (During the relevant time period it was the Beeson Travel Bureau.). The travel agent delivers the ticket to the Accounts Payable Clerk who gives it to the traveller upon presentation of his Travel Authorization. The travel agent bills NRA-ILA on a monthly basis. Travel Authorizations are placed with the relevant bills as a justification for payment before a check is issued to the Travel Bureau.

When an NRA-ILA employee travels on PVF business, he makes his reservation as above and NRA-ILA routinely pays the travel agent's bills. The traveller is also subject to the same NRA-ILA administrative controls as if he travelled on ILA business, including the audit of his voucher by NRA-ILA's Fiscal Officer. As indicated in the foregoing discussion of specific checks, NRA-PVF reimburses NRA-ILA to ensure that no corporate funds are used in connection with a federal election.

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In my view, when the NRA-PVF purchases from vendors regularly used by NRA-ILA, and when it utilizes credit arrangements previously established by NRA-ILA, it is not the beneficiary of a contribution or an expenditure since those terms, under the provisions of 2 U.S.C. 441 b(b) do not include administrative support of a separate segregated fund. It would appear that one of the purposes of that section is to relieve the corporation establishing such a fund not only from the burdens of hiring a separate set of employees and providing separate office space and equipment to run the separate segregated fund, or somehow allocating the costs between the corporation and the fund, but also from the burdens of duplicating such administrative procedures as those involving the travel and printing expenses outlined above.

If you have any views to the contrary, I would appreciate being advised of them. We can, of course, make changes in our procedures to accommodate your wishes. From our point of view, however, it would be preferable not to have separate PVF and ILA accounts with our vendors. In fact, inadvertent comingling of PVF and ILA funds may be more likely with such a system since the segregation of funds would not then depend on internal fiscal control but could be affected by the mistakes of vendors, purchasing agents and employees.

I am, of course, available to discuss this matter further with Miss Judy Thedford.

I await your advices in due course.

Sincerely,

James J. Featherstone
James J. Featherstone
Treasurer

JJF:mem

84040454289



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Featherstone, Treasurer
National Rifle Association Political
Victory Fund
1600 Rhode Island Ave., NW
Washington, DC 20036

RE: MUR 1110

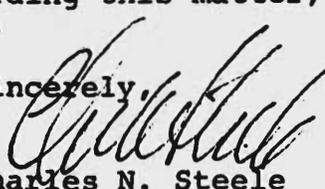
Dear Mr. Featherstone:

On March 11, 1980, you were notified that the Commission had found reason to believe that the NRA-Political Victory Fund and the NRA-Institute For Legislative Action may have violated 2 U.S.C. §441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). At that time, you were requested to supply specific information in connection with the alleged violation.

While we acknowledge meeting with you on March 12, 1980, to discuss this matter, as of this date we have received no written response. The Commission intends to conclude its investigation shortly. In the absence of any materials from you, the Commission will have to decide whether to take further action solely on the basis of information available from other sources.

If you have any questions regarding this matter, please call Judy Thedford, at 202/523-5071.

Sincerely,


Charles N. Steele
General Counsel

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84040454291

PS Form 3811, Apr 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
 Show to whom and date delivered
 Show to whom, date, and address of delivery
 RESTRICTED DELIVERY Show to whom and date delivered
 RESTRICTED DELIVERY Show to whom, date, and address of delivery
 (CONSULT POSTMASTER FOR

2. ARTICLE ADDRESSED TO:
James Fitzhugh
N.A.A. - P.O. #
1617 Rhode Island Ave
Wilmington, DE

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | *062110* | |

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE) Addressee Authorized agent
Griffith *W*

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:
MUR110

CLERK'S INITIALS

POSTMARK
 APR 3 1980
 WILMINGTON, DE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Rifle Association Institute
For Legislative Action
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1110

Dear Madam or Sir:

This letter is to notify you that the Federal Election Commission, in the normal course of carrying out its supervisory responsibilities, has found reason to believe the National Rifle Association Institute For Legislative Action may have violated 2 U.S.C. § 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). A report on the Commission's findings is enclosed for your information.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

In the absence of any information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such

84040454292

National Rifle Association
Institute for Legislative Action
Page 2

counsel to receive any notifications and other communications
from the Commission.

If you have any questions, please contact Judy Thedford
at (202)523-5071.

Sincerely,

Robert O. Tiernan
ROBERT O. TIERNAN
Chairman

Enclosure

Notification

8 4 0 4 0 4 5 4 2 9 3

1. The following service is requested (check one): <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> Show to whom, date, and address of delivery. <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY. <i>40</i> Show to whom, date, and address of delivery. (CONSULT POSTMASTER FOR FEES)		
2. ARTICLE ADDRESSED TO: <i>National Rifle Assoc Institute for Legislative Action</i>		
3. ARTICLE DESCRIPTION: REGISTERED NO. CERTIFIED NO. INSURED NO. <i>944131</i>		
4. I have received the article described above. SIGNATURE <input checked="" type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent <i>Judith A. Peterson</i>		
DATE OF DELIVERY	POSTMASTER'S OFFICE MAR 11 1980 CLERK'S INITIALS	
5. ADDRESS (Complete only if requested)		
6. UNABLE TO DELIVER BECAUSE:		

MURKIND - Thedford



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Rifle Association Institute
For Legislative Action
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1110

Dear Madam or Sir:

This letter is to notify you that the Federal Election Commission, in the normal course of carrying out its supervisory responsibilities, has found reason to believe the National Rifle Association Institute For Legislative Action may have violated 2 U.S.C. § 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). A report on the Commission's findings is enclosed for your information.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

In the absence of any information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such

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National Rifle Association
Institute for Legislative Action
Page 2

counsel to receive any notifications and other communications
from the Commission.

If you have any questions, please contact Judy Thedford
at (202)523-5071.

Sincerely,

Enclosure

Notification

84040454295

JA
3-4-80



FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE _____

MUR NO. 1110
STAFF MEMBER(S) & TEL. NO.
Judy Thedford

RESPONDENT National Rifle Association
Institute For Legislative Action

(202) 523-5071

SOURCE OF MUR: INTERNALLY GENERATED

BACKGROUND

On December 21, 1979, the Reports Analysis Division forwarded information to the Office of the General Counsel which alleges that the National Rifle Association Institute For Legislative Action (NRA-ILA) made corporate contributions in violation of 2 U.S.C. §441b(a) to the National Rifle Association Political Victory Fund (NRA-PVF).

FACTUAL BASIS AND LEGAL ANALYSIS

The Reports Analysis Division initially questioned the NRA-PVF concerning independent expenditures it reported as being paid in February of 1979. A notification letter was sent to the NRA-PVF requesting clarification of these entries. The response from Mr. Featherstone, treasurer of NRA-PVF, indicated that the expenditures were incurred in October and November of 1978, but not reported until their payment in February of 1979.

The Reports Analysis Division referred to the Office of the General Counsel the independent expenditure entries totalling \$1932.75 which were paid to the National Rifle Association Institute For Legislative Action (NFA-ILA), the National Rifle Association's incorporated lobbying organization. These entries reflect that the NRA-PVF paid the NRA-ILA for travel to disseminate communications and the printing of postcards in connection with independent expenditures. The referral alleged that this activity constituted possible corporate contributions.

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From this information, it appears that the NRA-ILA initially paid for travel to disseminate communications and the printing of postcards which advocated the election or defeat of certain federal candidates. Such activity by the NRA-ILA appears to meet the definition of an expenditure as defined by 2 U.S.C. § 441b(b)(2) and constitutes the making of corporate expenditures in violation of 2 U.S.C. § 441b(a).

Furthermore, it appears that the NRA-PVF by incurring the expenditures in October and November of 1978 and not paying for such activity until February of 1979, accepted a loan from NRA-ILA. In accordance with 2 U.S.C. § 441b(b)(2), the loan would be a contribution. Therefore, the NRA-PVF accepted illegal corporate contributions from the NRA-ILA in violation of 2 U.S.C. § 441b(a).

The referral also made references to payments reported by NRA-PVF to NRA-ILA for independent expenditures which also appear to be in violation of 2 U.S.C. § 441b(a). The additional entries total \$3,815 and were paid to the NRA-ILA for travel to disseminate communications and to assist a campaign.

In order to investigate this matter further, the Office of the General Counsel recommended finding reason to believe NRA-ILA may have violated 2 U.S.C. § 441b and to send the attached letter and notification.

Based on the foregoing analysis, the Federal Election Commission:

1. Found reason to believe that the National Rifle Association Institute For Legislative Action may have violated 2 U.S.C. § 441b(a).
2. Approved sending of the attached letter and notification.

84040454297



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Featherstone, Treasurer
National Rifle Association Political
Victory Fund
1600 Rhode Island Ave., NW
Washington, DC 20036

RE: MUR 1110

Dear Mr. Featherstone:

The Federal Election Commission previously notified you in a request for additional information dated May 16, 1979 and in a letter dated June 26, 1979, that certain entries in the National Rifle Association Political Victory Fund's reports indicated that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on February 26, 1980: that substantial compliance has been achieved with respect to the possible violation of 2 U.S.C. §441a(a)(1)(C) and that there is reason to believe that you may have violated 2 U.S.C. §441b(a). A report on the Commission's findings is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

84040454298

James Featherstone, Treasurer
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(4)(B) and §437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Judy Thedford at (202)523-5071.

Sincerely,

Robert O. Tiernan
ROBERT O. TIERNAN
Chairman

Enclosure

Notification

84040454299

POSTAGE WILL BE PAID BY ADDRESSEE

Return to: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space.

1. The following service is requested (check one):

- Show to whom and date delivered.
- RESTRICTED DELIVERY. Show to whom, date, and address of delivery.
- RESTRICTED DELIVERY. Show to whom and date delivered.
- RESTRICTED DELIVERY. Show to whom, date, and address of delivery.

2. ARTICLE ADDRESSED TO:
James Featherstone

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>944132</i>	

4. I have received the article described above.

SIGNATURE Addressee Authorized agent
Nickie A. Peterson

DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

WASHINGTON, DC TWENTY
MAR 1 1961
CLERK'S INITIALS

U.S. POST OFFICE

MURKIN - Thedford

The Commission is interested in the information you provide regarding the activities of your organization and its members. It is possible that your organization is in violation of the provisions of the Espionage Act, 18 U.S.C. 793(a). A finding of a violation of this Act is a serious matter and may result in the imposition of a fine or imprisonment. If you have any information which you believe is relevant to the Commission's investigation of this matter, please provide it to the Commission as soon as possible. If you are unable to provide this information, please advise the Commission of the reasons therefor. Appropriate, confidential sources should be notified accordingly.

In the absence of any additional information which substantiates that no further action should be taken against your committee, the Commission may issue a subpoena to compel the production of records and documents, and possibly the attendance of witnesses. This does not preclude the attainment of a settlement of this matter through formal conciliation prior to a finding of a violation of the Act. We believe if you so desire.

Sincerely,

84040
Enclosure
Notification

JK
3-4-80

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE _____

MUR NO. 1110

STAFF MEMBER(S) & TEL. NO.

Judy Thedford

National Rifle Association
RESPONDENT Political Victory Fund

(202) 523-5071

SOURCE OF MUR: INTERNALLY GENERATED

BACKGROUND

On December 21, 1979, the Reports Analysis Division forwarded information to the Office of the General Counsel which alleges that the National Rifle Association-Political Victory Fund (NRA-PVF) accepted corporate contributions in violation of 2 U.S.C. §441b(a) from the National Rifle Association Institute For Legislative Action, and made contributions to the Minnesota Gun Owners Political Victory Fund in violation of 2 U.S.C. §441a.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. §441a(a)(1)(C), 2 U.S.C. §441a(f)

The NRA-PVF reports listed \$5,698 in disbursements to the MGO-PVF during 1978 in violation of the \$5,000 limitation. The expenditures were reported by NRA-PVF as follows:

Date	Amount
8/7/78	\$2,500
8/23/78	\$2,000
9/26/78	\$ 86 (in-kind)
11/3/78	\$1,000
12/4/78	\$ 112 (in-kind)
	<u>\$5,698 TOTAL</u>

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In conjunction, the MGO-PVF reported receiving \$5,500 from the NRA-PVF. The \$198 in question were in-kind contributions from the NRA-PVF to MGO-PVF. The treasurer of the MGO-PVF stated he was unaware of the in-kind contributions and would amend the reports accordingly.

After the two committees received notices from the Commission that the contributions/expenditures were in violation of the \$5,000 limitation, MGO-PVF refunded \$698 to National Rifle Association Institute For Legislative Action on July 30, 1979. The National Rifle Association Institute For Legislative Action is the lobbying organization of the National Rifle Association.

In view of the limited extent of the violation and the fact the improper contributions have been refunded and reported, the Office of the General Counsel recommends taking no action and closing the file with respect to the violation of 2 U.S.C. § 441a(a) (1) (C) by NRA-PVF and 2 U.S.C. §441a(f) by MGO-PVF.

2 U.S.C. § 441b(a)

The Reports Analysis Division initially questioned the NRA-PVF concerning independent expenditures it reported as being paid in February of 1979. A notification letter was sent to the NRA-PVF requesting clarification of these entries. The response from Mr. Featherstone, treasurer of NRA-PVF, indicated that the expenditures were incurred in October and November of 1978, but not reported until their payment in February of 1979.

The Reports Analysis Division referred to the Office of the General Counsel the independent expenditure entries totalling \$1,932.75 which were paid to the National Rifle Association Institute For Legislative Action (NRA-ILA), the National Rifle Association's incorporated lobbying organization. These entries reflect that the NRA-PVF paid the NRA-ILA for travel to disseminate communications and the printing of postcards in connection with independent expenditures. The referral alleged that this activity constituted possible corporate contributions.

From this information, it appears that the NRA-ILA initially paid for travel to disseminate communications and the printing of postcards which advocated the election or defeat of certain federal candidates. Such activity by the NRA-ILA appears to meet the definition of an expenditure as defined by 2 U.S.C. § 441b(b) (2) and constitutes the making of corporate expenditures in violation of 2 U.S.C. § 441b(a).

Furthermore, it appears that the NRA-PVF by incurring the expenditures in October and November of 1978 and not paying for such activity until February of 1979, accepted a loan from the NRA-ILA. In accordance with 2 U.S.C. § 441b(b)(2), the loan would be a contribution. Therefore, the NRA-PVF accepted illegal corporate contributions from the NRA-ILA in violation of 2 U.S.C. § 441b(a).

The referral also made reference to payments reported by NRA-PVF to NRA-ILA for independent expenditures which also appear to be in violation of 2 U.S.C. § 441b(a). The additional entries total \$3,815 and were paid to the NRA-ILA for travel to disseminate communications and to assist a campaign.

In order to investigate this matter further, the Office of the General Counsel recommended finding reason to believe NRA-PVF may have violated 2 U.S.C. § 441b and to send the attached letter and notification.

Based on the foregoing analysis, the Federal Election Commission:

1. Determined to take no further action with respect to the National Rifle Association Political Victory Fund's violation of 2 U.S.C. § 441a(a)(1)(C).
2. Found reason to believe that the National Rifle Association Political Victory Fund may have violated 2 U.S.C. § 441b(a).
3. Approved sending the letter and notification.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bruce Tweedy, Treasurer
Minnesota Gun Owners Political
Victory Fund
12952 Nicollet Avenue
Burnsville, MN 55337

RE: MUR 1110

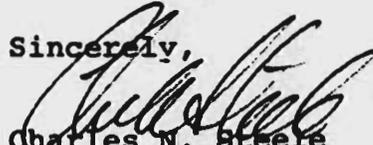
Dear Mr. Tweedy:

On June 29, 1979, the Commission notified you that your committee may have violated 2 U.S.C. §441a of the Federal Election Campaign Act of 1971, as amended. Specifically, it appeared that in 1978 the Minnesota Gun Owners Political Victory Fund accepted contributions in excess of \$5,000 from the National Rifle Association Political Victory Fund.

The Commission, on February 26, 1980, determined that substantial compliance had been achieved with respect to the violation as the excessive portion has been refunded and subsequently reported to the Commission. Accordingly, the Commission voted to terminate its inquiry into the above matter.

If you have any questions, please contact Judy Thedford, at 202/523-5071.

Sincerely,


Charles N. Steere
General Counsel

84040454305

84040454306

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● **SENDER:** Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
 Show to whom and date delivered
 Show to whom, date, and address of delivery
 RESTRICTED DELIVERY
 Show to whom and date delivered
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery. \$
 (CONSULT POSTMASTER FOR FEES)

2. **ARTICLE ADDRESSED TO:**
Bruce Tweedy

3. **ARTICLE DESCRIPTION:**
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | *9441-28* | |

4. (Always obtain signature of addressee or agent)
 I have received the article described above.
 SIGNATURE Addressee Authorized agent
Bruce L. Tweedy
 DATE OF DELIVERY *3-11-80* POSTMARK
 BURNSVILLE, MN
 MAR 11 1980
 5533

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:
 INITIALS
JD

U.S. POST OFFICE 1978-272-382

11110 - Audrey Hedden



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bruce Tweedy, Treasurer
Minnesota Gun Owners Political
Victory Fund
12952 Nicollet Avenue
Burnsville, MN 55337

RE: MUR 1110

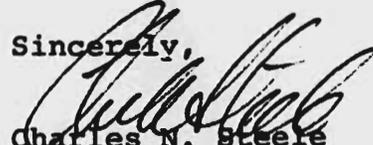
Dear Mr. Tweedy:

On June 29, 1979, the Commission notified you that your committee may have violated 2 U.S.C. §441a of the Federal Election Campaign Act of 1971, as amended. Specifically, it appeared that in 1978 the Minnesota Gun Owners Political Victory Fund accepted contributions in excess of \$5,000 from the National Rifle Association Political Victory Fund.

The Commission, on February 26, 1980, determined that substantial compliance had been achieved with respect to the violation as the excessive portion has been refunded and subsequently reported to the Commission. Accordingly, the Commission voted to terminate its inquiry into the above matter.

If you have any questions, please contact Judy Thedford, at 202/523-5071.

Sincerely,


Charles N. Steele
General Counsel

84040454307



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bruce Tweedy, Treasurer
Minnesota Gun Owners Political
Victory Fund
12952 Nicollet Avenue
Burnsville, MN 55337

RE: MUR 1110

Dear Mr. Tweedy:

On June 29, 1979, the Commission notified you that your committee may have violated 2 U.S.C. §441a of the Federal Election Campaign Act of 1971, as amended. Specifically, it appeared that in 1978 the Minnesota Gun Owners Political Victory Fund accepted contributions in excess of \$5,000 from the National Rifle Association Political Victory Fund.

The Commission, on 1980, determined that substantial compliance had been achieved with respect to the violation as the excessive portion has been refunded and subsequently reported to the Commission. Accordingly, the Commission voted to terminate its inquiry into the above matter.

If you have any questions, please contact Judy Thedford, at 202/523-5071.

Sincerely,

Charles N. Steele
General Counsel

84040454300

3-4-80

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1110
National Rifle Association)
Political Victory Fund)
National Rifle Association)
Institute for Legislative)
Action)
Minnesota Gun Owners Political)
Victory Fund)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 26, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1110:

1. Find REASON TO BELIEVE that the National Rifle Association Political Victory Fund may have violated 2 U.S.C. §441b(a).
2. Find REASON TO BELIEVE that the National Rifle Association Institute For Legislative Action may have violated 2 U.S.C. §441b(a).
3. Take no action with respect to the National Rifle Association Political Victory Fund's violation of 2 U.S.C. §441a(a)(1)(C).

(Continued)

84040454309

CERTIFICATION

MUR 1110

First General Counsel's Report

Dated: February 19, 1980

Page 2

4. Take no action with respect to the Minnesota Gun Owners Political Victory Fund's violation of 2 U.S.C. §441a(f).
5. Send the letters and notifications as attached to the above-named report.

Attest:

Marjorie W. Emons

**Marjorie W. Emons
Secretary to the Commission**



84040454310

Received in Office of the Commission Secretary: 2-19-80, 10:49
Circulated on 48 hour vote basis: 2-19-80, 4:00
Objection filed 2-22-80. Objection withdrawn 2-26-80 at Executive Session.



FEDERAL ELECTION COMMISSION

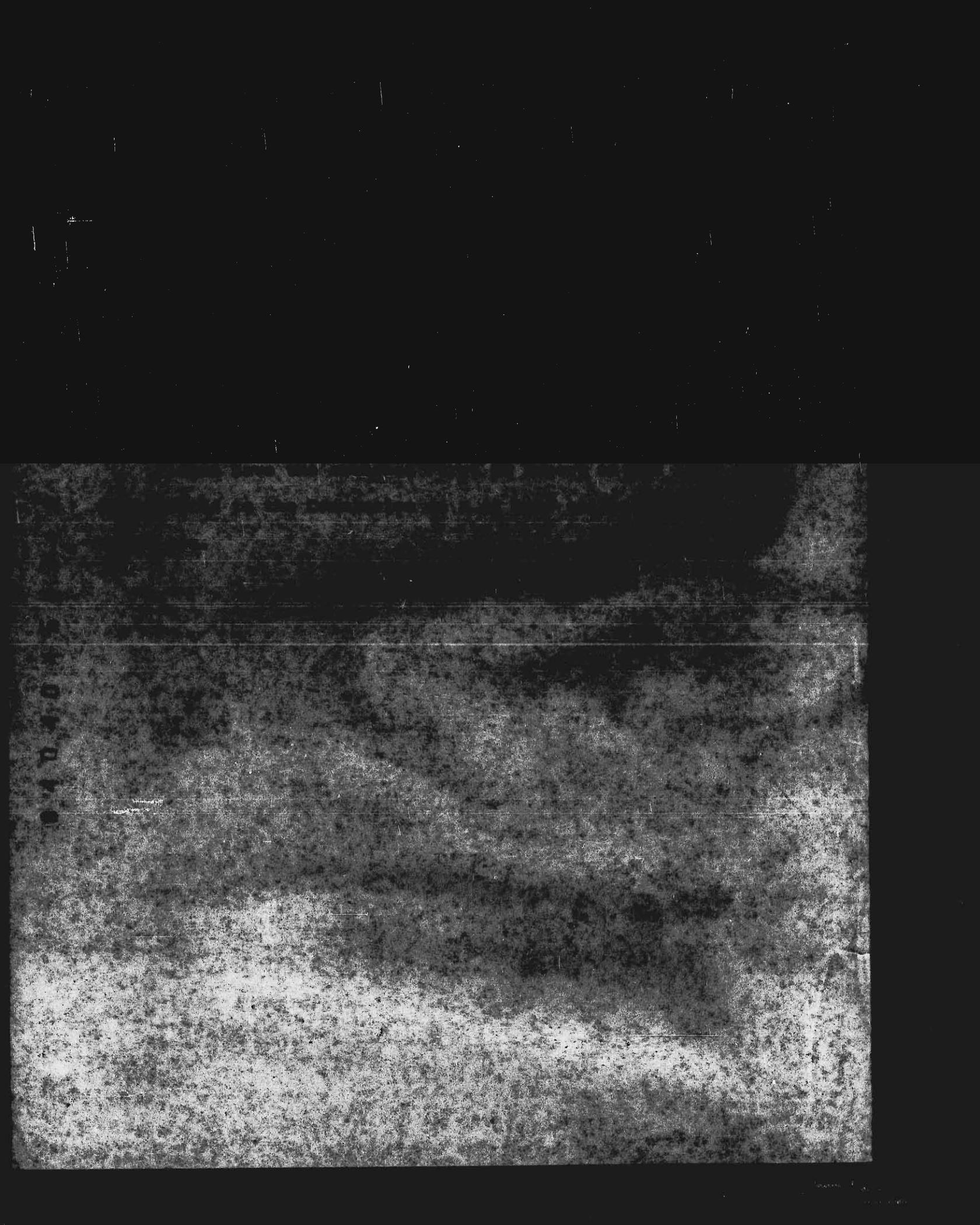
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS/ROBERT M. BAILEY
DATE: FEBRUARY 22, 1980
SUBJECT: MUR 1110 - First General Counsel's Report
dated 2-19-80; Received in OCS
2-19-80, 10:49

The above-named document was circulated on a 48
hour vote basis at 4:00, February 19, 1980.

Commissioner Friedersdorf submitted an objection
at 9:48, February 22, 1980, thereby placing MUR 1110
on the Executive Session Agenda for Thursday, February
26, 1980.

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FIRST GENERAL COUNSEL'S REPORT

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

80 FEB 19
MUR # 1110
AIO: 49

DATE AND TIME OF TRANSMITTEL
BY OGC TO THE COMMISSION 2-19-80

STAFF MEMBER Judy Thedford

COMPLAINANT'S NAME: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: National Rifle Association Political Victory Fund,
National Rifle Association Institute for Legislative
Action, Minnesota Gun Owners Political Victory Fund

RELEVANT STATUTE: 2 U.S.C. §441b(a)
2 U.S.C. §441a(a)(1)(C)
2 U.S.C. §441a(f)

INTERNAL REPORTS CHECKED: National Rifle Association Political Victory
Fund and Minnesota Gun Owners Political Victory
Fund by RAD

FEDERAL AGENCIES CHECKED: N/A

SUMMARY OF ALLEGATIONS

On December 21, 1979, the Reports Analysis Division forwarded the attached referrals to the Office of the General Counsel. The referrals alleged that the National Rifle Association Political Victory Fund (NRA-PVF) may have violated 2 U.S.C. §441a and §441b, and that the Minnesota Gun Owners Political Victory Fund (MGO-PVF) may have violated 2 U.S.C. §441a.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. §441a(a)(1)(C), 2 U.S.C. §441a(f)

The NRA-PVF reports listed \$5,698 in disbursements to the MGO-PVF during 1978 in violation of the \$5,000 limitation. The expenditures were reported by NRA-PVF as follows:

Date	Amount
8/7/78	\$2,500
8/23/78	\$2,000
9/26/78	\$ 86 (in-kind)
11/3/78	\$1,000
12/4/78	\$ 112 (in-kind)
	<u>\$5,698 TOTAL</u>

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In conjunction, the MGO-PVF reported receiving \$5,500 from the NRA-PVF. The \$198 in question were in-kind contributions from the NRA-PVF to MGO-PVF. The treasurer of the MGO-PVF stated he was unaware of the in-kind contributions and would amend the reports accordingly.

After the two committees received notices from the Commission that the contributions/expenditures were in violation of the \$5,000 limitation, MGO-PVF refunded \$698 to National Rifle Association Institute For Legislative Action on July 30, 1979. The National Rifle Association Institute For Legislative Action is the lobbying organization of the National Rifle Association.

In view of the limited extent of the violation and the fact the improper contributions have been refunded and reported, the Office of the General Counsel recommends taking no action and closing the file with respect to the violation of 2 U.S.C. § 441a(a) (1) (C) by NRA-PVF and 2 U.S.C. § 441a(f) by MGO-PVF.

2 U.S.C. § 441b(a)

The Reports Analysis Division initially questioned the NRA-PVF concerning independent expenditures it reported as being paid in February of 1979. A notification letter was sent to the NRA-PVF requesting clarification of these entries. The response from Mr. Featherstone, treasurer of NRA-PVF, indicated that the expenditures were incurred in October and November of 1978, but not reported until their payment in February of 1979.

The Reports Analysis Division referred to the Office of the General Counsel the independent expenditure entries totalling \$1,932.75 which were paid to the National Rifle Association Institute For Legislative Action (NRA-ILA), the National Rifle Association's incorporated lobbying organization. These entries reflect that the NRA-PVF paid the NRA-ILA for travel to disseminate communications and the printing of postcards in connection with independent expenditures. The referral alleged that this activity constituted possible corporate contributions.

From this information, it appears that the NRA-ILA initially paid for travel to disseminate communications and the printing of postcards which advocated the election or defeat of certain federal candidates. Such activity by the NRA-ILA appears to meet the definition of an expenditure as defined by 2 U.S.C. § 441b(b) (2) and constitutes the making of corporate expenditures in violation of 2 U.S.C. § 441b(a).

Furthermore, it appears that the NRA-PVF by incurring the expenditures in October and November of 1978 and not paying for such activity until February of 1979, accepted a loan from the NRA-ILA. In accordance with 2 U.S.C. § 441b(b)(2), the loan would be a contribution. Therefore, the NRA-PVF accepted illegal corporate contributions from the NRA-ILA in violation of 2 U.S.C. § 441b(a).

The referral also made reference to payments reported by NRA-PVF to NRA-ILA for independent expenditures which also appear to be in violation of 2 U.S.C. § 441b(a). The additional entries total \$3,815 and were paid to the NRA-ILA for travel to disseminate communications and to assist a campaign.

In order to investigate this matter further, the Office of the General Counsel recommends finding reason to believe NRA-PVF and NRA-ILA may have violated 2 U.S.C. § 441b and to send the attached letters and notifications.

RECOMMENDATIONS

R 4 0 4 0 4 5 4 3 1 5

1. Find reason to believe that the National Rifle Association Political Victory Fund may have violated 2 U.S.C. § 441b(a).
2. Find reason to believe that National Rifle Association Institute For Legislative Action may have violated 2 U.S.C. § 441b(a).
3. Take no action with respect to National Rifle Association Political Victory Fund's violation of 2 U.S.C. § 441a(a)(1)(C).
4. Take no action with respect to Minnesota Gun Owners Political Victory Fund's violation of 2 U.S.C. § 441a(f).
5. Send the attached letters and notifications.

Attachments

- Letters
- Notifications
- Referrals





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bruce Tweedy, Treasurer
Minnesota Gun Owners Political
Victory Fund
12952 Nicollet Avenue
Burnsville, MN 55337

RE: MUR 1110

Dear Mr. Tweedy:

On June 29, 1979, the Commission notified you that your committee may have violated 2 U.S.C. §441a of the Federal Election Campaign Act of 1971, as amended. Specifically, it appeared that in 1978 the Minnesota Gun Owners Political Victory Fund accepted contributions in excess of \$5,000 from the National Rifle Association Political Victory Fund.

The Commission, on 1980, determined that substantial compliance had been achieved with respect to the violation as the excessive portion has been refunded and subsequently reported to the Commission. Accordingly, the Commission voted to terminate its inquiry into the above matter.

If you have any questions, please contact Judy Thedford, at 202/523-5071.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Featherstone, Treasurer
National Rifle Association Political
Victory Fund
1600 Rhode Island Ave., N.W.
Washington, D.C. 20036

RE: MUR 1110

Dear Mr. Featherstone:

The Federal Election Commission previously notified you in a request for additional information dated May 16, 1979 and in a letter dated June 29, 1979, that certain entries in the National Rifle Association Political Victory Fund's reports indicated that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on _____, 1980: that substantial compliance has been achieved with respect to the possible violation of 2 U.S.C. §441a(a)(1)(C) and that there is reason to believe that you may have violated 2 U.S.C. §441b(a). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

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Mr. James Featherstone, Treasurer
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(4)(B) and §437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Judy Thedford at 202/523-5071.

Sincerely,

Enclosure

Notification

84040454318

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE _____

MUR NO. 1110

STAFF MEMBER(S) & TEL. NO.

Judy Thedford

National Rifle Association
RESPONDENT Political Victory Fund

(202) 523-5071

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On December 21, 1979, the Reports Analysis Division forwarded information to the Office of the General Counsel which alleges that the National Rifle Association-Political Victory Fund (NRA-PVF) accepted corporate contributions in violation of 2 U.S.C. §441b(a) from the National Rifle Association Institute For Legislative Action, and made contributions to the Minnesota Gun Owners Political Victory Fund in violation of 2 U.S.C. §441a.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. §441a(a)(1)(C), 2 U.S.C. §441a(f)

The NRA-PVF reports listed \$5,698 in disbursements to the MGO-PVF during 1978 in violation of the \$5,000 limitation. The expenditures were reported by NRA-PVF as follows:

Date	Amount
8/7/78	\$2,500
8/23/78	\$2,000.
9/26/78	\$ 86 (in-kind)
11/3/78	\$1,000
12/4/78	\$ 112 (in-kind)
	<hr/> \$5,698 TOTAL

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In conjunction, the MGO-PVF reported receiving \$5,500 from the NRA-PVF. The \$198 in question were in-kind contributions from the NRA-PVF to MGO-PVF. The treasurer of the MGO-PVF stated he was unaware of the in-kind contributions and would amend the reports accordingly.

After the two committees received notices from the Commission that the contributions/expenditures were in violation of the \$5,000 limitation, MGO-PVF refunded \$698 to National Rifle Association Institute For Legislative Action on July 30, 1979. The National Rifle Association Institute For Legislative Action is the lobbying organization of the National Rifle Association.

In view of the limited extent of the violation and the fact the improper contributions have been refunded and reported, the Office of the General Counsel recommends taking no action and closing the file with respect to the violation of 2 U.S.C. § 441a(a) (1) (C) by NRA-PVF and 2 U.S.C. §441a(f) by MGO-PVF.

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2 U.S.C. § 441b(a)

The Reports Analysis Division initially questioned the NRA-PVF concerning independent expenditures it reported as being paid in February of 1979. A notification letter was sent to the NRA-PVF requesting clarification of these entries. The response from Mr. Featherstone, treasurer of NRA-PVF, indicated that the expenditures were incurred in October and November of 1978, but not reported until their payment in February of 1979.

The Reports Analysis Division referred to the Office of the General Counsel the independent expenditure entries totalling \$1,932.75 which were paid to the National Rifle Association Institute For Legislative Action (NRA-ILA), the National Rifle Association's incorporated lobbying organization. These entries reflect that the NRA-PVF paid the NRA-ILA for travel to disseminate communications and the printing of postcards in connection with independent expenditures. The referral alleged that this activity constituted possible corporate contributions.

From this information, it appears that the NRA-ILA initially paid for travel to disseminate communications and the printing of postcards which advocated the election or defeat of certain federal candidates. Such activity by the NRA-ILA appears to meet the definition of an expenditure as defined by 2 U.S.C. § 441b(b) (2) and constitutes the making of corporate expenditures in violation of 2 U.S.C. § 441b(a).

Furthermore, it appears that the NRA-PVF by incurring the expenditures in October and November of 1978 and not paying for such activity until February of 1979, accepted a loan from the NRA-ILA. In accordance with 2 U.S.C. § 441b(b)(2), the loan would be a contribution. Therefore, the NRA-PVF accepted illegal corporate contributions from the NRA-ILA in violation of 2 U.S.C. § 441b(a).

The referral also made reference to payments reported by NRA-PVF to NRA-ILA for independent expenditures which also appear to be in violation of 2 U.S.C. § 441b(a). The additional entries total \$3,815 and were paid to the NRA-ILA for travel to disseminate communications and to assist a campaign.

In order to investigate this matter further, the Office of the General Counsel recommended finding reason to believe NRA-PVF may have violated 2 U.S.C. § 441b and to send the attached letter and notification.

Based on the foregoing analysis, the Federal Election Commission:

1. Determined to take no further action with respect to the National Rifle Association Political Victory Fund's violation of 2 U.S.C. § 441a(a)(1)(C).
2. Found reason to believe that the National Rifle Association Political Victory Fund may have violated 2 U.S.C. § 441b(a).
3. Approved sending the letter and notification.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Rifle Association Institute For
Legislative Action
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1110

Dear Madam or Sir:

This letter is to notify you that the Federal Election Commission, in the normal course of carrying out its supervisory responsibilities, has found reason to believe the National Rifle Association Institute For Legislative Action may have violated 2 U.S.C. §441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). A report on the Commission's findings is enclosed for your information.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

In the absence of any information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(4)(B) and §437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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National Rifle Association
Institute for Legislative Action
Page 2

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Judy Thedford at 202/523-5071.

Sincerely,

Enclosure

Notification

84040454323

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE _____

MUR NO. 1110
STAFF MEMBER(S) & TEL. NO.
Judy Thedford
(202) 523-5071

RESPONDENT National Rifle Association
Institute For Legislative Action

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On December 21, 1979, the Reports Analysis Division forwarded information to the Office of the General Counsel which alleges that the National Rifle Association Institute For Legislative Action (NRA-ILA) made corporate contributions in violation of 2 U.S.C. §441b(a) to the National Rifle Association Political Victory Fund (NRA-PVF).

FACTUAL BASIS AND LEGAL ANALYSIS

The Reports Analysis Division initially questioned the NRA-PVF concerning independent expenditures it reported as being paid in February of 1979. A notification letter was sent to the NRA-PVF requesting clarification of these entries. The response from Mr. Featherstone, treasurer of NRA-PVF, indicated that the expenditures were incurred in October and November of 1978, but not reported until their payment in February of 1979.

The Reports Analysis Division referred to the Office of the General Counsel the independent expenditure entries totalling \$1932.75 which were paid to the National Rifle Association Institute For Legislative Action (NRA-ILA), the National Rifle Association's incorporated lobbying organization. These entries reflect that the NRA-PVF paid the NRA-ILA for travel to disseminate communications and the printing of postcards in connection with independent expenditures. The referral alleged that this activity constituted possible corporate contributions.

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From this information, it appears that the NRA-ILA initially paid for travel to disseminate communications and the printing of postcards which advocated the election or defeat of certain federal candidates. Such activity by the NRA-ILA appears to meet the definition of an expenditure as defined by 2 U.S.C. § 441b(b)(2) and constitutes the making of corporate expenditures in violation of 2 U.S.C. § 441b(a).

Furthermore, it appears that the NRA-PVF by incurring the expenditures in October and November of 1978 and not paying for such activity until February of 1979, accepted a loan from NRA-ILA. In accordance with 2 U.S.C. § 441b(b)(2), the loan would be a contribution. Therefore, the NRA-PVF accepted illegal corporate contributions from the NRA-ILA in violation of 2 U.S.C. § 441b(a).

The referral also made references to payments reported by NRA-PVF to NRA-ILA for independent expenditures which also appear to be in violation of 2 U.S.C. § 441b(a). The additional entries total \$3,815 and were paid to the NRA-ILA for travel to disseminate communications and to assist a campaign.

In order to investigate this matter further, the Office of the General Counsel recommended finding reason to believe NRA-ILA may have violated 2 U.S.C. § 441b and to send the attached letter and notification.

Based on the foregoing analysis, the Federal Election Commission:

1. Found reason to believe that the National Rifle Association Institute For Legislative Action may have violated 2 U.S.C. § 441b(a).
2. Approved sending of the attached letter and notification.

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December 21, 1979

MEMORANDUM

TO: Charles Steele
THROUGH: Orlando B. Potter *[Signature]*
FROM: TOM HASELHORST
SUBJECT: Referrals for N.A. Political Victory Fund and Minnesota
Gun Owners Political Victory Fund

MUR 1110

Please note that the attached referrals for the above mentioned committees are concerned with the same transaction and should be reviewed and handled simultaneously.

84040454326

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/21/79 ANALYST Mark Kleirman MK
TO: Office of General Counsel TEAM CHIEF Steve Mims SM
THROUGH: STAFF DIRECTOR JAP. COMPLIANCE REVIEW PS/CB
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: NRA Political Victory Fund
TREASURER: James Featherstone
ADDRESS: 1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036
AFFILIATE(S): None

ALLEGATION(S): Receipt of corporate contributions CITE: 2 U.S.C. 441b SEE ATTACHMENT(S) #4
Excessive transfer to another political committee CITE: 2 U.S.C. 441a SEE #6
DATE INITIATED: 5-16-79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other: ATTACHMENT
 Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 11-28-78 TO 2-28-79
TOTAL RECEIPTS \$ 8,162 TOTAL EXPENDITURES \$ 224,432
CASH ON HAND \$ 76,419 DEBTS \$ 0

HISTORY:
RESULTS OF REVIEW: Request For Additional Information sent 5-16-79 ATTACHMENT #2
Response 6-5-79 #4
Surface Violation letter sent 6-29-79 #6
Response 7-10-79 #8
Response 8-17-79 #9

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT #3
Telecon: 5-30-79 #7
Telecon: 7-5-79

REASON(S) FOR REFERRAL: Both allegations exceed thresholds ATTACHMENT
Services rendered by connected organization not excluded in definition of contribution per 2 U.S.C. 441b(b)(2).

OTHER PENDING ACTIONS INITIATED BY RAD: None ATTACHMENT

OTHER RELEVANT INFORMATION: Additional corporate contributions ATTACHMENT #5
Contribution refund not reported on October 10 Quarterly Report
Cross-reference with Minnesota Gun Owners Political Victory Fund ATTACHMENT #10

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

ATTACHMENT #1

84040454328

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
NRA POLITICAL VICTORY FUND								
CONNECTED ORGANIZATION: RIFLE ASS'N OF AMERICA; NAT'L								
	1977 STATEMENT OF ORGANIZATION- AMENDMENT					9FEB77	4	77FEC/048/2329
	STATEMENT OF ORGANIZATION- AMENDMENT					22APR77	2	77FEC/052/3779
	STATEMENT OF ORGANIZATION- AMENDMENT					9MAY77	2	77FEC/053/1169
	STATEMENT OF ORGANIZATION- AMENDMENT					21JUN77	3	77FEC/054/2973
	STATEMENT OF ORGANIZATION- AMENDMENT					25AUG77	4	77FEC/057/4182
1978	STATEMENT OF ORGANIZATION- AMENDMENT					20MAR78	2	78FEC/069/0284
	MISCELLANEOUS TRANSACTION TO F.E.C.					27MAR78	2	78FEC/069/2014
	MISCELLANEOUS TRANSACTION FROM F.E.C.					12APR78	1	78FEC/071/2562
	REQUEST FOR ADDITIONAL INFORMATION					29SEP78	4	78FEC/086/2416
	STATEMENT OF ORGANIZATION- AMENDMENT					10OCT78	2	78FEC/087/2505
	STATEMENT OF ORGANIZATION- AMENDMENT					23OCT78	2	78FEC/090/5303
	STATEMENT OF ORGANIZATION- AMENDMENT					25OCT78	4	78FEC/091/2971
1977	APRIL 10 QUARTERLY	3,702		706		1JAN77 -31MAR77	7	77FEC/050/5400
	JULY 10 QUARTERLY	975		7,291		1APR77 -30JUN77	1	77FEC/055/1265
	OCTOBER 10 QUARTERLY	10,830		3,500		1JUL77 -30SEP77	5	77FEC/060/0475
	YEAR END REPORT	14,951		13,030		1OCT77 -31DEC77	7	78FEC/065/3772
1978	APRIL 10 QUARTERLY	3,606		3,800		1JAN78 -31MAR78	8	78FEC/071/0808
	MAY MONTHLY	30,981		6,650		1APR78 -30APR78	8	78FEC/075/0279
	MAY MONTHLY - AMENDMENT					1APR78 -30APR78	2	78FEC/086/2114
	JUNE MONTHLY	443,465		8,422		1MAY78 -31MAY78	25	78FEC/077/1014
	JUNE MONTHLY - AMENDMENT					1MAY78 -31MAY78	2	78FEC/086/1547
	JULY MONTHLY	50,135		10,600		1JUN78 -30JUN78	8	78FEC/080/5142
	JULY MONTHLY - AMENDMENT					1JUN78 -30JUN78	2	78FEC/086/2116
	AUGUST MONTHLY	19,992		8,821		1JUL78 -31JUL78	7	78FEC/083/1816
	AUGUST MONTHLY - AMENDMENT					1JUL78 -31JUL78	1	78FEC/085/3757
	SEPTEMBER MONTHLY	8,721		59,366		1AUG78 -31AUG78	16	78FEC/085/3758
	OCTOBER MONTHLY	6,302		100,535		1SEP78 -30SEP78	21	78FEC/091/1634
	10 DAY PRE-GENERAL					23OCT78	2	78FEC/091/2141
	10 DAY PRE-GENERAL	8,188		141,984		1OCT78 -23OCT78	18	78FEC/092/5456
	REQUEST FOR ADDITIONAL INFORMATION					1OCT78 -23OCT78	3	79FEC/134/4731
	10 DAY PRE-GENERAL - AMENDMENT					1OCT78 -23OCT78	4	79FEC/136/2741
	30 DAY POST-GENERAL	3,316		137,114		24OCT78 -27NOV78	38	78FEC/098/0025
	REQUEST FOR ADDITIONAL INFORMATION					24OCT78 -27NOV78	3	79FEC/130/0151
	REQUEST FOR ADDITIONAL INFORMATION					24OCT78 -27NOV78	2	79FEC/134/4734
	30 DAY POST-GENERAL - AMENDMENT					24OCT78 -27NOV78	3	79FEC/131/0932
	30 DAY POST-GENERAL - AMENDMENT					24OCT78 -27NOV78	2	79FEC/136/3991
	YEAR END REPORT	626		70,359		28NOV78 -31DEC78	11	79FEC/118/5140
	REQUEST FOR ADDITIONAL INFORMATION					28NOV78 -31DEC78	2	79FEC/127/2511
	REQUEST FOR ADDITIONAL INFORMATION					28NOV78 -31DEC78	3	79FEC/134/4739
	REQUEST FOR ADDITIONAL INFORMATION					28NOV78 -31DEC78	3	79FEC/134/4735
	YEAR END REPORT - AMENDMENT					28NOV78 -31DEC78	5	79FEC/128/3013
	YEAR END REPORT - AMENDMENT					28NOV78 -31DEC78	1	79FEC/136/3984
	TOTAL	605,790	0	572,178	0		249	TOTAL PAGES

ID# C00053553

ALL REPORTS HAVE RECEIVED BASIC REVIEW

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
NRA POLITICAL VICTORY FUND								
CONNECTED ORGANIZATION: RIFLE ASS'N OF AMERICA; NAT'L								
	1979 MISCELLANEOUS TRANSACTION FROM F.E.C.					29MAR79	1	79FEC/122/3121
	MISCELLANEOUS TRANSACTION TO F.E.C.					17AUG79	4	79FEC/135/0088
	MISCELLANEOUS TRANSACTION TO F.E.C.					17OCT79	3	79FEC/140/0519
	FEBRUARY MONTHLY	3,692		2,510		1JAN79 -31JAN79	9	79FEC/121/4340
	REQUEST FOR ADDITIONAL INFORMATION					1JAN79 -31JAN79	1	79FEC/127/2513
	FEBRUARY MONTHLY - AMENDMENT					1JAN79 -31JAN79	2	79FEC/126/3771
	MARCH MONTHLY	528		14,441		1FEB79 -28FEB79	13	79FEC/122/2131
	REQUEST FOR ADDITIONAL INFORMATION					1FEB79 -28FEB79	3	79FEC/123/1557
	MARCH MONTHLY - AMENDMENT					1FEB79 -28FEB79	2	79FEC/125/1442
	REQUEST FOR ADDITIONAL INFORMATION					1FEB79 -28FEB79	3	79FEC/127/2914
	MARCH MONTHLY - AMENDMENT					1FEB79 -28FEB79	2	79FEC/126/3769
	REQUEST FOR ADDITIONAL INFORMATION					1FEB79 -28FEB79	3	79FEC/134/4745
	REQUEST FOR ADDITIONAL INFORMATION					1FEB79 -28FEB79	3	79FEC/134/4742
	MARCH MONTHLY - AMENDMENT					1FEB79 -28FEB79	2	79FEC/134/3985
	APRIL MONTHLY	917		45,991		1MAR79 -31MAR79	10	79FEC/124/1043
	APRIL MONTHLY - AMENDMENT					31MAR79	2	79FEC/125/3584
	REQUEST FOR ADDITIONAL INFORMATION					1MAR79 -31MAR79	3	79FEC/134/4748
	APRIL MONTHLY - AMENDMENT					1MAR79 -31MAR79	1	79FEC/134/3990
	JULY 10 QUARTERLY	953		10,497		1APR79 -30JUN79	13	79FEC/131/0055
	OCTOBER 10 QUARTERLY	26,889		5,225		1JUL79 -30SEP79	7	79FEC/139/1373
	OCTOBER 10 QUARTERLY - AMENDMENT					30SEP79	4	79FEC/139/1070
	TOTAL	32,979	0	78,622			91	TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW

ATTACHMENT #2

84040454331



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

16 MAY 1979

James J. Featherstone, Treasurer
NRA Political Victory Fund
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

Dear Mr. Featherstone:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

Year End, February Monthly &

During review of the March Monthly Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Mark Kleinman in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

8 4 0 4 0 4 5 4 3 3 2

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

TO: NRA POLITICAL VICTORY FUND

DATE: 16 MAY 1979

I.D. NO.: C00053553

REQUEST FOR ADDITIONAL INFORMATION FOR THE February Monthly REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 1-1-79 THROUGH 1-31-79, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

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- Coverage Dates: omitted or incorrect
- Summary Page Line(s): Column(s): Totals: omitted or incorrect
- Detailed Summary (Page 2) Line(s): Column(s): Totals: omitted or incorrect
- Schedule Totals: disagree with Detailed Summary (Page 2) or omitted
- Date(s): omitted or inadequate for Schedule(s) Line(s)
- Full Name(s)/Mailing Address(es): omitted or inadequate for Schedule(s) Line(s)
- Occupation/Principal Place(s) of Business: omitted or inadequate for Schedule(s) Line(s)
- Election Designation: omitted or inadequate for Schedule(s) Line(s)
- Aggregate Year-to-Date Totals: omitted or inadequate for Schedule(s) Line(s)
- Nature or Purpose of Expenditure: omitted or inadequate for Schedule(s) E Line(s) 23 SEE PAGE TWO
- Nature or Purpose of Receipt: omitted or inadequate for Schedule(s) Line(s)
- Inadequate Description of: proceeds dates events location of Schedule.
- Signature: omitted inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

Other: _____

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

TO: NRA POLITICAL VICTORY FUND

DATE: 16 MAY 1979

I.D. NO.: C00053553

REQUEST FOR ADDITIONAL INFORMATION FOR THE March Monthly REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 2-1-79 THROUGH 2-28-79,
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

- 8 4 0 4 0 4 5 4 3 3 4
- Coverage Dates: omitted or incorrect
 - Summary Page Line(s): Column(s): Totals: omitted or incorrect
 - Detailed Summary (Page 2) Line(s): Column(s): Totals: omitted or incorrect
 - Schedule Totals: disagree with Detailed Summary (Page 2) or omitted
 - Date(s): omitted or inadequate for Schedule(s) Line(s)
 - Full Name(s)/Mailing Address(es): omitted or inadequate for Schedule(s) Line(s)
 - Occupation/Principal Place(s) of Business: omitted or inadequate for Schedule(s) Line(s)
 - Election Designation: omitted or inadequate for Schedule(s) Line(s)
 - Aggregate Year-to-Date Totals: omitted or inadequate for Schedule(s) Line(s)
 - Nature or Purpose of Expenditure: omitted or inadequate for Schedule(s) E Line(s) 23 SEE PAGE T
 - Nature or Purpose of Receipt: omitted or inadequate for Schedule(s) Line(s)
 - Inadequate Description of: proceeds dates events location of Schedule
 - Signature: omitted inadequate
- 11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.*
- Other: _____

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

**NRA POLITICAL VICTORY FUND
REQUEST FOR ADDITIONAL INFORMATION
PAGE TWO**

All Reports

Please clarify the circumstances of the independent expenditures listed on Schedule E, Line 23. If these expenditures were for the purpose of influencing the 1978 General Election, then please provide an explanation as to why these expenditures were made after the date of election.

Year End Report

Please provide an explanation for the disclosure of independent expenditures on Schedule E, Line 23, outside the coverage dates of this report. Please amend this and other previous reports accordingly.

8 4 0 4 0 4 5 4 3 3 5

ATTACHMENT #3

84040454336

TELECON TO THE FILE: NRA POLITICAL VICTORY FUND

FROM: ROBERT SNOW

DATE: 5-30-79

RE: Requests For Additional Information --- late reporting independent expenditures

I received a call from James Featherstone, 457-5900, concerning a clarification of a request for additional information requiring information on independent expenditures being reported after election. The caller stated that these were billing dates. I stated that the date of the communication is needed. All reports need to be amended accordingly.

James Featherstone, Treasurer
457-5900

84040454337

ATTACHMENT #4

84040454338





NRA
Political Victory Fund

Institute for Legislative Action
 P.O. Box 2019, Washington, D.C. 20013

RECEIVED
 FEDERAL ELECTION
 COMMISSION
 '79 JUN 5 PM 12:11

May 31, 1979

Mr. Orlando B. Potter, Staff Director
 Federal Election Commission
 1325 K Street, NW
 Washington, DC 20463

Dear Mr. Potter:

Reference is made to your letter of May 16, 1979.

The Commission has requested certain information relating to independent expenditures of the NRA Political Victory Fund reported on Schedule E, line 23 of the Year End Report of 1978. That report contains two pages ("3 of 4" and "4 of 4") of independent expenditures made by the PVF from our temporary Illinois bank account. (Enclosed is a copy of our letter of October 20, 1978, by which we reported the opening of the account.) Documents supporting these expenditures and the particulars thereof did not reach this office until after the report of November expenditures was filed on December 7, 1978, in our Post Election Report. Our accountant, Mr. William LeStrange, advises us that prior to preparing the Year End Report he received advice by telephone from the Commission that these expenditures could be reported in the Year End Report, rather than by amending the Post Election Report, since both were made in the same calendar year. If necessary, please consider this letter to be an amendment of the Post Election Report, so as to include the expenditures reported on pages 3 and 4 of Schedule E filed with the Year End Report. There follows a further explanation of these independent expenditures:

84040454339

<u>PAYEE</u>	<u>PARTICULARS</u>
Indestructo Rental Co.	Rental of tables and chairs for telephone bank from October 29 to November 7, 1978.
Carol Van Heltrebrake	Sublease of building at 7032 Golf Rd., Morton Grove, IL, for telephone bank
Hankton Coffee Service	Coffee for workers for three days for telephone bank effort.
Jake's Restaurant	Food for workers of telephone bank, November 4-6, '78.
Grove Motel	Rooms for telephone bank staff, October 30-Nov. 6

FELIX...
 COMM...
 11/19/78
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 12:11

John Schrader Trash removal from building used for telephone bank.

Lorraine Ross 33 hours of temporary help during the first week of November 1978 at the telephone bank

Charles Strubig 41 hours of temporary help during the first week of November, 1978, at the telephone bank

Cash Miscellaneous expenses of food, supplies, etc., for telephone bank operation during the first week of November 1978.

Regarding this same Year End Report, the Commission also questions the making of independent expenditures for 1978 election expenses, after the date of said election. These expenditures were in payment of bills for pre-election expenses. They were paid in the ordinary course of business, after the election. All the payments on pages 1 and 2 of Schedule E, line 23 of the Year End Report were for pre-election expenses as follows:

84040454340

<u>PAYEE</u>	<u>PARTICULARS</u>
Holiday Inn Tewksbury, MA	Room rental of October 23, 1978, paid by check on December 1. Used as a meeting room to disseminate communications advocating the defeat of John Buckley, MA-5.
Mike Lashbrook	December 4 payment was reimbursement for November 4-5 travel expenses incurred while disseminating communications advocating the election of Jack Herrity, VA-8.
Wickham & Associates	December 8 payments (2) were for the October 25 and November 8 bills for design of a poster and a brochure advocating the election of Jack Herrity, VA-8.
NRA Institute for Legislative Action	The December 11 payment was for the October 20 printing of postcards advocating the defeat of Abner Mikva, IL-10.
Swift Mailing Service	Check of December 11 for \$478.48 covered the mailing house costs of a November 1 mailing advocating the defeat of Abner Mikva, IL-10. (excluding postage)
Swift Mailing Service	Check of December 11 for \$189.64 was payment for the November 2 mailing house costs (excluding postage) advocating the election of Jack Herrity, VA-8.
P. Daniel Smith	December 14 payment was for travel expenses incurred October 18, 19, 26, 30, 31 and November 1-6 to disseminate communications advocating the defeat of Abner Mikva, IL-10.

Michael J. Lashbrook

December 21 payment was for October 24 car rental and mileage to disseminate communications advocating the election of Jack Herrity, VA-8.

Jim Land

The December 22 payment was reimbursement for the pre-election purchase of stakes for yard signs advocating the election of Jack Herrity, VA-8.

The Commission has requested a clarification of the circumstances of the independent expenditures listed on Schedule E, line 23, of the February Monthly Report. Expenditures reported for that period were for obligations incurred before the November election as follows:

PAYEE

PARTICULARS

TWA

January 4 payment of \$60.25 for October 4 shipment of bumper stickers and brochures urging the defeat of John Buckley, MA-5.

Ambassador Group

January 5 payment for pre-election radio and newspaper advertisements advocating the election of Jack Herrity, VA-8.

Billerica Rod and Gun Club, Inc.

January 5 payment of \$32.40 for postage used to mail brochures urging the defeat of John Buckley, MA-5.

Ambassador Group

January 8 payment for pre-election radio and newspaper advertisements advocating the election of Douglas Bereuter, NE-1.

TWA

January 8 payment of \$65.40 covered the October 4 shipment of brochures and bumper stickers advocating the election of Douglas Bereuter, NE-1.

The Commission has requested a clarification of the circumstances of the independent expenditures listed on Schedule E, line 23, of the March Monthly Report. Expenditures reported for that period were for obligations incurred before the November election, as follows:

PAYEE

PARTICULARS

Alert Office Services

February 9 check paid for October mailing services to disseminate communications advocating the defeat of Abner Mikva, IL-10.

Lincoln Printing and Typesetting

February 13 check of \$16.72 sales tax for earlier purchase of yard signs advocating the election of Douglas Bereuter, NE-1.

NRA Institute for Legislative Action

February 13: check for \$312 travel on October 25 to disseminate communications advocating the defeat of Abner Mikva; \$312 travel October 18-19 to disseminate communications advocating the defeat of Abner Mikva; \$120 travel October 23 to disseminate communications advocating the defeat of John Buckley, MA-5; \$226 travel October 30 - November 1 to disseminate

84040454341

four

communications advocating the election of Douglas Bereuter, NE-1; \$312 travel October 30 - November 6 to disseminate communications advocating the defeat of Abner Mikva; \$212 travel on October 24-26 to disseminate communications advocating the election of Douglas Bereuter, NE-1; \$404.58 check for design of brochure urging the defeat of John Buckley, MA-5.

February 15: \$73.95 for computer labels for mailing advocating the election of Douglas Bereuter, NE-1; \$251.50 for labels for mailing advocating the defeat of Abner Mikva, IL-10; \$25.50 for preparation of envelopes for mailing advocating the defeat of John Buckley, MA-5; \$9.35 for labels for mailing advocating the election of Douglas Bereuter, NE-1; \$624.25 for labels and mailroom costs of mailing advocating the election of Jack Herrity, VA-8; \$1,436.70 for October 27 shipping costs of materials advocating the defeat of John Buckley, MA-5.

We trust the above information is a sufficient response to your inquiries.

Sincerely,


James J. Featherstone
Treasurer

JJF:mem

84040454342

ITEMIZED INDEPENDENT EXPENDITURES
 FOR LINE 23, FEC FORM 3

(See Reverse Side for Instructions)

Name of Candidate or Committee in Full NRA POLITICAL VICTORY FUND	ID No. C 00053553
Full Name, Mailing Address and ZIP Code NRA POLITICAL VICTORY FUND 1600 Rhode Island Avenue, N.W. Washington, D.C. 20036	Is this a Separate Report by a Committee filing on FEC Form 3a? <u>NO</u>

Itemize independent expenditures which exceed, in the aggregate, \$100 within a calendar year.

Full Name, Mailing Address & ZIP Code of Each Payee	Particulars of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought:
24 E NRA - Institute for Legislative Action 11-1-65	Travel to disseminate comm. advocating election of Douglas Bereuter H8NE01016 (8)	2/13/79	\$ 226.00	Douglas Bereuter Nebraska - 1st District <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
24 A NRA - Institute for Legislative Action	Travel to disseminate comm. advocating defeat of Abner Mikva H6IL10028 (8)	2/13/79	312.00	Abner Mikva Illinois - 10th District <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
24 E NRA - Institute for Legislative Action	Travel to disseminate comm. advocating elect. of Douglas Bereuter H8NE01016 (8)	2/13/79	212.00	Douglas Bereuter Nebraska - 1st District <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
24 A NRA - Institute for Legislative Action	Communication advocating defeat of John Buckley (brochure) H8MA05036 (8)	2/13/79	404.50	John Buckley Mass. - 5th District <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
24 E NRA - Institute for Legislative Action	Communications advocating election of Douglas Bereuter (letter) H8NE01016 (8)	2/15/79	73.95	Douglas Bereuter Nebraska - 1st District <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			\$ 1,228.45	
(b) SUBTOTAL of Unitemized Independent Expenditures			\$ _____	
(c) TOTAL Independent Expenditures			\$ _____	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this 23rd day of

March, 1979

My Commission expires

Nov. 30, 1983

Jacquelyn C. Ji
 NOTARY PUBLIC

James J. Featherstone
 Signature

3/23/79
 Date

ITEMIZED INDEPENDENT EXPENDITURE
FOR LINE 23, FEC FORM 3

(See Reverse Side for Instructions)

Name of Candidate or Committee in Full		
NRA POLITICAL VICTORY FUND		
Full Name, Mailing Address and ZIP Code		
NRA POLITICAL VICTORY FUND 1600 Rhode Island Avenue, N.W. Washington, D.C. 20036		
Itemize independent expenditures which exceed, in the aggregate, \$100 within a calendar year.		
Full Name, Mailing Address & ZIP Code of Each Payee	Particulars of Expenditure	Date
24 E NRA - Institute for Legislative Action 11-1-65	Travel to disseminate comm. advocating election of Douglas Bereuter H8NE01016	2/1
24 A NRA - Institute for Legislative Action	Travel to disseminate comm. advocating defeat of Abner Mikva H6IL10028	2/1
24 E NRA - Institute for Legislative Action	Travel to disseminate comm. advocating elect. of Douglas Bereuter H8NE01016	2/1
29 A NRA - Institute for Legislative Action	Communication advocating defeat of John Buckley (brochure) H8MA05036	2/1
24 E NRA - Institute for Legislative Action	Communications advocating election of Douglas Bereuter (letter) H8NE01016	2/1
(a) SUBTOTAL of Itemized Independent Expenditures		
(b) SUBTOTAL of Unitemized Independent Expenditures		
(c) TOTAL Independent Expenditures		

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, the campaign committee, or their agent.

James J. Featherstone
Signature

3/23/79
Date

Sub:
My
H

ATTACHMENT #5

84040454345

ITEMIZED INDEPENDENT EXPENDITURE
 FOR LINE 23, FEC FORM 3

(See Reverse Side for Instructions)

Name of Candidate or Committee in Full NRA POLITICAL VICTORY FUND	I.D. No. C 00053553
Full Name, Mailing Address and ZIP Code NRA POLITICAL VICTORY FUND 1600 Rhode Island Avenue, N.W. Washington, D.C. 20036	Is this a Separate Report by a Committee filing on FEC Form 3e? <u>No</u>

Itemize independent expenditures which exceed, in the aggregate, \$100 within a calendar year.

Full Name, Mailing Address & ZIP Code of Each Payee	Particulars of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Metro Printing and Mailing Services, Inc. 8446 Lee Highway Fairfax, Va. 22031 <i>2/A C00086307</i>	Printing and Mailing brochures Advocating Defeat of Donald Fraser	9-20-78	\$ 663.10	Donald Fraser U.S. Senate Minnesota <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Theodore A. Lattanzio <i>2/A C00086397</i>	Travel to Distribute communications urging Defeat of Donald Fraser	9-20-78 9-20-78	317.07 349.88	Donald Fraser U.S. Senate Minnesota <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Tanya K. Metaksa <i>2/A C00086397</i>	Travel to Distribute communications urging Defeat of Donald Fraser	9-20-78	171.39	Donald Fraser U.S. Senate Minnesota <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Gateways Unlimited <i>2/A C00086307</i>	Balloons with written message urging Defeat of Donald Fraser	9-20-78	288.50	Donald Fraser U.S. Senate Minnesota <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
NRA Institute for Legislative Action 1600 Rhode Island Avenue, N.W. Washington, D.C. 20036 <i>2/A C00086307</i>	Travel to Disseminate Comm. urging Defeat of Donald Fraser	9-20-78	1,738.00	Donald Fraser U.S. Senate Minnesota <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose

(a) SUBTOTAL of Itemized Independent Expenditures	\$ _____
(b) SUBTOTAL of Unitemized Independent Expenditures	\$ _____
(c) TOTAL Independent Expenditures	\$ _____

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

James J. Featherstone 10/20/78
 Signature Date

Subscribed and sworn to before me this 20th day of October, 1978.

My Commission expires: Nov. 30, 1978
Jacquelyn C. Pitt
 NOTARY PUBLIC

34040454346

JUL 8
AND
OCT. 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED INDEPENDENT EXPENDITURES
FOR LINE 23, FEC FORM 3

Page 8 of 8 Pages

(See Reverse Side for Instructions)

Name of Candidate or Committee in Full NRA POLITICAL VICTORY FUND	I.D. No. C 00053553
Full Name, Mailing Address and ZIP Code NRA POLITICAL VICTORY FUND 1600 Rhode Island Ave., N.W. Washington, D.C. 20036	Is this a Separate Report by a Committee filing on FEC Form 3a? <u>No</u>

Itemize independent expenditures which exceed, in the aggregate, \$100 within a calendar year.

Full Name, Mailing Address & ZIP Code of Each Payee	Particulars of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Federal Express Corp. Bbx 18695 Memphis Tn 38118	Transporting Brochures <i>C00016883</i>	11/20/78	\$ 18.53	John Buckley Mass. - 5th District <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
NRA Institute for Legislative Action <i>11-1-65</i>	Travel to Nebraska to establish office to disseminate comm. <i>C00051785</i>	10/31/78	222.00	Douglas Bereuter Nebraska - 1st District <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
NRA Institute for Legislative Action <i>11-1-65</i>	Travel to disseminate communications <i>C00081885</i>	10/31/78	308.00	Douglas Bereuter Nebraska - 1st District <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
Illinois Bell Telephone Co, Skokie, IL	Telephone used to disseminate comm. <i>C00048041</i>	10/26/78	5,153.00	Abner Mikva Illinois - 10th District <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Postmaster Morton Grove, ILL	Postage to disseminate communications <i>C00048041</i>	10/27/78	150.00	Abner Mikva Illinois - 10th District <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			\$ <u>18,140.80</u>	
(b) SUBTOTAL of Unitemized Independent Expenditures			\$ _____	
(c) TOTAL Independent Expenditures				\$ <u>18,140.80</u>

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

James J. Featherstone 12/17/78
Signature Date

Subscribed and sworn to before me this 7th day of
December, 1978
My Commission expires:
Nov. 30, 1983
Jacqueline [Signature]
NOTARY PUBLIC

84040454317

24

1978
 Federal Election Commission
 400 K Street, N.W.
 Washington, D.C. 20463

**ITEMIZED INDEPENDENT EXPENDITURES
 FOR LINE 23, FEC FORM 3**

(See Reverse Side for Instructions)

Name of Candidate or Committee in Full NRA POLITICAL VICTORY FUND	I.D. No. C 00053553
Full Name, Mailing Address and ZIP Code NRA POLITICAL VICTORY FUND 1600 Rhode Island Ave., N.W. Washington, D.C. 20036	Is this a Separate Report by a Committee filing an FEC Form 3e? <u>No</u>

Itemize independent expenditures which exceed, in the aggregate, \$100 within a calendar year.

Full Name, Mailing Address & ZIP Code of Each Payee	Particulars of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Theodore A. Lattanzio 1600 Rhode Island Ave. NW Washington, DC 20036	Travel to disseminate communications C00081885	11/8/78	\$ 324.64	Douglas Bereuter Nebraska - 1st District <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
Ambassador Group 3310 Morse Rd. Columbus, OH 43229	Advertising C00081885	11/13/78	2,159.36	Douglas Bereuter Nebraska - 1st District <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
Swift Mailing Service 4000 Pennwood Road Brentwood, Md. 20722	Communications Advocating election of Douglas Bereuter C00081885	11/13/78	65.00	Douglas Bereuter Nebraska - 1st District <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
National Creative Printing 10745 - 3 Tucker St. Beltsville, Md. 20705	Communications Advocating defeat of Senator Charles Percy C00032136	11/14/78	646.30	<input type="checkbox"/> Support <input type="checkbox"/> Oppose
NRA Institute for Legislative Action 11-1-65 1600 Rhode Island Ave. NW Washington, DC 20036	Travel to disseminate communications C00048041	11/16/78	312.00	Abner Mikva Illinois - 10th District <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose

(a) SUBTOTAL of Itemized Independent Expenditures	\$ _____
(b) SUBTOTAL of Unitemized Independent Expenditures	\$ _____
(c) TOTAL Independent Expenditures	\$ _____

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

James J. Featherstone 12/17/78
 Signature Date

Subscribed and sworn to before me this 7th day of December, 1978.

My Commission expires:
Nov. 30, 1983
Jacqueline C. [Signature]
 NOTARY PUBLIC

84040454349

478
Election Commission
K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES
(Operating, Transfers Out, Contributions in-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 1 of 1 for
Line Number 22c

(Use Separate Schedules for
each numbered line)

4
C000 54361
C000 54361
C000 54361
C000 54361

Name of Candidate or Committee in Full			
NRA POLITICAL VICTORY FUND			
Full Name, Mailing Address and ZIP Code Susan E. Racce	Particulars of Expenditure Travel expense to assist campaign of Mark W. Hannaford	Date (month, day, year) 12/1/78	Amount of each expendi- ture this period \$ 12.81
Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Archer Air Courier Division of Archer Courier Sys. 855 Avenue of the Americas New York, NY 10001	Particulars of Expenditure Air Freight delivery of cheshire tables to Minn. Gun Owners PVF	Date (month, day, year) 12/4/78	Amount of each expendi- ture this period 112.00
Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Swift Mailing Service, Inc.	Particulars of Expenditure Comm. advocating election of R. Boshwitz, A. Quie & H. Knutson in Minn. Gen Ele.	Date (month, day, year) 12/11/78	Amount of each expendi- ture this period 339.76
Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code NRA Institute for Legislative Action 11-1-65	Particulars of Expenditure Travel to assist campaign of Mark W. Hannaford	Date (month, day, year) 12/27/78	Amount of each expendi- ture this period 414.00
Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Metro Printing & Mailing Service 8446 Lee Highway Fairfax, VA 22031	Particulars of Expenditure Comm. advocating the election of R. Boschwitz, A. Quie & H. Knutson	Date (month, day, year) 12/28/78	Amount of each expendi- ture this period 369.68
Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
SUBTOTAL of expenditures this page (optional).....			\$ 1,248.25
TOTAL this period (last page this line number only).....			\$ 1,248.25

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

(Use Separate Schedules for each numbered line)

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Name of Candidate or Committee in Full			
NRA POLITICAL VICTORY FUND			
Full Name, Mailing Address and ZIP Code 11-1-65 NRA - Institute for Legislative Action C00087726	Particulars of Expenditure Travel to disseminate comm. advocating election of Wayne Grisham CA-33	Date (month, day, year) 2/13/79	Amount of each expenditure this period \$ 414.00
Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code NRA - Institute for Legislative Action C00101113	Particulars of Expenditure to a political committee (Minnesota Gun Owners PVF) for cheshire labels	Date (month, day, year) 2/15/79	Amount of each expenditure this period 96.05
Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code NRA - Institute for Legislative Action C00077313	Particulars of Expenditure Labels for comm. advocating elect. of R. Boschwitz, A. Quie and H. Knutson, Minn.	Date (month, day, year) 2/15/79	Amount of each expenditure this period 149.20 48.00
Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
SUBTOTAL of expenditures this page (optional)			\$ 655.25
TOTAL this period (last page this line number only)			\$ 655.25

ATTACHMENT #6

84040454352





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 1979

James J. Featherstone, Treasurer
National Rifle Association Political
Victory Fund
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

Dear Mr. Featherstone:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, (the Act) as amended. During the review of the 30 Day Post-General Report of Receipts and Expenditures, we noticed entries indicating that you may have made contributions which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act prohibits political committees from making contributions to any other political committee in any calendar year which, in the aggregate, exceed \$5,000.

If you find that the entries in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Alternatively, if you find that your contributions were in excess of the limits set forth in the Act, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of Receipts and Expenditures.

4040454353



SCHEDULE B
REVISED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20043

ITEMIZED EXPENDITURES
 (Operating, Transfer Out, Contributions in Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page 1 of 11 for
 Line Number 22b
 (Use Separate Schedules for
 each numbered line)

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Name of Candidate or Committee in Full			
NRA Political Victory Fund			
Full Name, Mailing Address and ZIP Code Citizens for Cochran P.O. Box 55110 Washington, DC 20022	Particulars of Expenditure Contribution	Date (month, day, year) 8-2-78	Amount of each expenditure this period 100.00
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Minnesota Gun Owners' Political Victory Fund 17299 Flagstaff Avenue Farmington, MN 55024	Particulars of Expenditure Contribution	Date (month, day, year) 8-2-78	Amount of each expenditure this period 2,500.00
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Campaign Committee for Lamar Gudger P.O. Box 8042 Washington, DC 20024	Particulars of Expenditure Contribution	Date (month, day, year) 8-7-78	Amount of each expenditure this period 100.00
Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Friends for Jim Abdnor 1701 N. Kent Street Suite 802 Rosslyn, VA 22209	Particulars of Expenditure Contribution	Date (month, day, year) 8-7-78	Amount of each expenditure this period 100.00
Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Friends of Paul Tribble 12284 Warwick Blvd Suite 2-H Newport News, VA 23606	Particulars of Expenditure Contribution	Date (month, day, year) 8-7-78	Amount of each expenditure this period 100.00
Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Friends of Bob Livingston Committee P.O. Box 7111 New Orleans, LA 70186	Particulars of Expenditure Contribution	Date (month, day, year) 8-7-78	Amount of each expenditure this period 125.00
Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Jerry Huckaby Re-election Committee P.O. Box 24026, SW Station Washington, DC 20024	Particulars of Expenditure Contribution	Date (month, day, year) 8-7-78	Amount of each expenditure this period 100.00
Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Cranes in Congress Committee 1500 Wilson Blvd. Suite 515 Arlington, VA 22209	Particulars of Expenditure Contribution	Date (month, day, year) 8-7-78	Amount of each expenditure this period 200.00
Expenditure for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
SUBTOTAL of expenditures this page (add page)			\$3,325.00
TOTAL this period (last page this line number only)			\$

SCHEDULE C
REVISED
 January, 1978
 Federal Election Commission
 325 K Street, N.W.
 Washington, D.C. 20463

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions in-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page 10 of 11 for
 Line Number 22b

(Use Separate Schedules for
 each numbered line)

781040454355

Name of Candidate or Committee in Full			
NRA Political Victory Fund			
Full Name, Mailing Address and ZIP Code Minnesota Gun Owners Political Victory Fund 17299 Flagstaff Avenue Farmington, MN 55024	Particulars of Expenditure Political Contribution	Date (month, day, year) 8-23-78	Amount of each expendi- ture this period 2,000.00
Expenditure for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Friends of Avi Nelson 89 State Street, Suite 730 Boston, Mass. 02109	Particulars of Expenditure Campaign Contribution	Date (month, day, year) 8-24-78	Amount of each expendi- ture this period 2,500.00
Expenditure for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Citizens and Sportsmen against Richard Rynd 3222 Midfield Road Pikesville, MD 21208	Particulars of Expenditure Political Contribution Maryland Legislature	Date (month, day, year) 8-30-78	Amount of each expendi- ture this period 600.00
Expenditure for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Whetmough for Delegate Campaign 7527 Kenlea Avenue Baltimore, MD 21236	Particulars of Expenditure Campaign Contribution Maryland Legislature	Date (month, day, year) 8-29-78	Amount of each expendi- ture this period 1,000.00
Expenditure for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code The Sportsman's Political Action Committee 121 East 31st Street New York, NY 10016	Particulars of Expenditure Political Contribution	Date (month, day, year) 8-30-78	Amount of each expendi- ture this period 2,500.00
Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Goldwater Committee '78 P.O. Box 23412 L'Enfant Plaza Station Washington, DC 20024	Particulars of Expenditure Contribution	Date (month, day, year) 8-24-78	Amount of each expendi- ture this period 100.00
Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Committee to Re-elect Congress- man Ziferetti c/o Joan Franco, Treasurer 635 East 38th Street New York, NY 10017	Particulars of Expenditure Contribution	Date (month, day, year) 8-24-78	Amount of each expendi- ture this period 100.00
Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code The Bacham Congressional Comm. P.O. Box 2421 Newport Beach, CA 92660	Particulars of Expenditure Contribution	Date (month, day, year) 8-24-78	Amount of each expendi- ture this period 200.00
Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
SUBTOTAL of expenditures this page (optional)			\$9,000.00
TOTAL this period (last page this line number only)			\$

1978
 Election Commission
 70 K Street, N.W.
 Washington, D.C. 20483

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 1 of 1 for

Line Number 14 & 15
 (have no extra forms
 to do separately)
 (Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full			
Minnesota Gun Owners Political Victory Fund			
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Margaret Gustafson 715 Birch Street Anoka, Minn 55303	Principal Place of Business Geith Pharmacy Occupation Clerk <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500	Date (month, day, year) 8-7-78	Amount of each Receipt this Period \$500.
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Ronald Jerch 16440 Quartz Avenue Anoka, Minn 55303	Principal Place of Business 16440 Quartz Ave. Anoka, Minn. 55303 Occupation	Date (month, day, year) 8-21-78	Amount of each Receipt this Period \$500
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Mrs. Ronald Jerch 16440 Quartz Avenue Anoka, Minn. 55303	Principal Place of Business N.A. Occupation Housewife <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$	Date (month, day, year) 8-21-78	Amount of each Receipt this Period \$500
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code N.R.A. Political Victory Fund 1600 Rhode Island Avenue N.W. Washington, D.C. 20036.	Principal Place of Business 1600 Rhode Island Ave. Washington, D.C. Occupation	Date (month, day, year) 8-9-78 8-23-78	Amount of each Receipt this Period \$2000. 2500
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 4500	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$	Date (month, day, year)	Amount of each Receipt this Period
SUBTOTAL of receipts this page (optional)			\$6000.
TOTAL this period (last page this line number only)			\$6000.

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Name of Candidate or Committee in Full Minnesota Gun Owners' Political Victory Fund			
Full Name, Mailing Address and ZIP Code Gun Owners of America PVF 443 Capitol Mall Sacramento, California 95814	Principal Place of Business same C 000 30999	Date (month, day, year) 31 Oct. '78	Amount of each Receipt this Period 500.00
	Occupation ?		
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 500.00			
Full Name, Mailing Address and ZIP Code National Rifle Association PVF 1600 Rhode Island Avenue, N.W. Washington, D.C. C 000 53553	Principal Place of Business same	Date (month, day, year) 6 Nov. '78	Amount of each Receipt this Period 1,000.00
	Occupation ?		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 5,500.00			
Full Name, Mailing Address and ZIP Code Jon Willand 145 Malcolm Ave. S.E. Minneapolis, Minn. 55414	Principal Place of Business none	Date (month, day, year) abt. 15 Nov. '78	Amount of each Receipt this Period 158.20 (loan)
	Occupation historian		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 579.30			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$			
TOTAL of receipts this page (optional)			\$
Total this period (last page this line number only)			\$ 1,658.20

Name of Candidate or Committee in Full

NRA POLITICAL VICTORY FUND

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Minnesota Gun Owners Political Victory Fund COO10113	Minnesota Senatorial Democratic Primary - Travel Expenses Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	9-26-78	\$ 86.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period

Minnesota Gun Owners Political Victory Fund
 does not disclose the receipt of this in
 kind contribution from NRA Political Victory
 Fund.

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SUBTOTAL of expenditures this page (optional)	\$ 86.00
TOTAL this period (last page this line number only)	\$ 86.00

ITEMIZED EXPENDITURES

(Reporting Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Line Number 22c

(Use Separate Schedules for
each numbered line)

1978
Election Commission
K Street, N.W.
Washington, D.C. 20463

Name of Candidate or Committee in Full

NRA POLITICAL VICTORY FUND

Full Name, Mailing Address and ZIP Code

Susan E. Recca

Particulars of Expenditure

Travel expense to assist
campaign of Mark W. Hannaford

Date (month,
day, year)
12/1/78

Amount of each expendi-
ture this period
\$ 12.81

Expenditure for:

Primary General Other

Full Name, Mailing Address and ZIP Code

Archer Air Courier
Division of Archer Courier Sys.
855 Avenue of the Americas
New York, NY 10001

Particulars of Expenditure

Air Freight delivery of
cheshire tables to Minn. Gun
Owners PVP

Date (month,
day, year)
12/4/78

Amount of each expendi-
ture this period
112.00

Expenditure for:

Primary General Other

Full Name, Mailing Address and ZIP Code

Swift Mailing Service, Inc.

Particulars of Expenditure

Comm. advocating election
of R. Boshwitz, A. Quis &
H. Knutson in Minn. Gen Ele.

Date (month,
day, year)
12/11/78

Amount of each expendi-
ture this period
339.75

Expenditure for:

Primary General Other

Full Name, Mailing Address and ZIP Code

NRA Institute for Legislative
Action

Particulars of Expenditure

Travel to assist campaign
of Mark W. Hannaford

Date (month,
day, year)
12/27/78

Amount of each expendi-
ture this period
414.00

Expenditure for:

Primary General Other

Full Name, Mailing Address and ZIP Code

Metro Printing & Mailing Service
8446 Lee Highway
Fairfax, VA 22031

Particulars of Expenditure

Comm. advocating the election
of R. Boshwitz, A. Quis &
H. Knutson

Date (month,
day, year)
12/28/78

Amount of each expendi-
ture this period
369.68

Expenditure for:

Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

Primary General Other

SUBTOTAL of expenditures this page (optional).....

\$ 1,248.25

TOTAL this period (last page this line number only).....

\$ 1,248.25

040454360

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C00054361

C00054361

ATTACHMENT #7

84040454361

TELECON TO THE FILE: NRA POLITICAL VICTORY FUND

FROM: MARK KLEINMAN

DATE: 7-5-79

RE: Surface Violation - Excessive transfer out to Minnesota Gun Owners

I spoke with James Featherstone, Treasurer, 457-5900, who informed me that they had already sent a letter to the recipient committee asking for a refund. I told him to just send a copy of that letter to us and report the refund when it is received. He stated that it was simply a matter of getting the per election limitation confused with the per calendar year limitation. He stated that the committee usually gives only to candidates.

James Featherstone, Treasurer
457-5900

84040454362

84040454363

ATTACHMENT #8



NRA
Political Victory Fund

Institute for Legislative Action
P.O. Box 2019, Washington, D.C. 20013

RECEIVED
FEDERAL ELECTION
COMMISSION

79 JUL 10 AM 11:46

July 5, 1979

Mr. Orlando B. Potter
Federal Election Commission
Washington, DC 20463

RE: 2SV1/79-43

Attention: Mr. Mark Kleinman

Gentlemen:

Reference is made to your letter of June 29, 1979, concerning our contributions to the Minnesota Gun Owners Political Victory Fund. Reference is also made to my telephone conversation of this date with Mark Kleinman.

As Mr. Kleinman requested, enclosed is a copy of our letter of June 13, 1979, to the Treasurer of the Minnesota Gun Owners Political Victory Fund requesting a refund of the amount in excess of \$5,000.

We will report the refund as soon as it is received.

Sincerely,

James J. Featherstone
James J. Featherstone
Treasurer

JJF:jmb
Enclosure

84040454364



NRA
Political Victory Fund

Institute for Legislative Action
P.O. Box 2019, Washington, D.C. 20013

June 13, 1979

Mr. Bruce Tweedy, Treasurer
Minnesota Gun Owners
Political Victory Fund
12952 Nicollett Avenue, South
No. 202
Burnsville, MN 55337

Dear Mr. Tweedy:

An examination of our records discloses that the NRA Political Victory Fund inadvertantly overcontributed to your committee in calendar year 1978; in the sum of \$698. That figure was arrived at by totaling the following contributions:

<u>Date</u>	<u>Check Number</u>	<u>Page</u>	<u>Amount</u>	<u>Purpose</u>
8/7/78	(wired)	Minnesota Gun Owners-PVF	2500	Contribution
8/23/78	1096	Minnesota Gun Owners-PVF	2000	Contribution
9/26/78	1215	NRA Institute for Legislative Action	86	In-kind contribution for travel of Minn. Gun Owners-PVF Treasurer, N. Jensvold
11/3/78	(wired)	Minnesota Gun Owners-PVF	1000	Contribution
12/4/78	1490	Archer Air Courier	112	Freight costs to send labels to Minnesota Gun Owners-PVF

It would be greatly appreciated if this oversight were corrected by the return as soon as possible of \$698.

Thank you for your understanding and assistance.

Sincerely,

James J. Featherstone
James J. Featherstone
Treasurer

JJF:jmb

84040454365

ATTACHMENT #9

84040454366





INRA
Political Victory Fund

Institute for Legislative Action
P.O. Box 2019, Washington, D.C. 20013

RECEIVED
LEGAL ELECTION
COMMISSION

'79 AUG 17 PH 12:09

August 14, 1979

Mr. Orlando B. Potter
Federal Election Commission
Washington, DC 20463

Attention: Mr. Mark Kleinman

Gentlemen:

Reference is made to our letter of July 5, 1979, which enclosed a copy of our letter to Bruce Tweedy, the Treasurer of the Minnesota Gun Owners Political Victory Fund, requesting a refund of \$698.00.

Enclosed is a copy of a letter from Mr. Tweedy, dated July 30, 1979, with which he transmitted a check for \$698.00. This check has been deposited in our account.

Sincerely yours,

James J. Featherstone
James J. Featherstone
Treasurer

JJF:mem

Enclosure

040454367



MINNESOTA GUN OWNERS' POLITICAL VICTORY FUND

17299 Flagstaff Avenue
Farmington, Minnesota 55024

July 30 1979

Mr. James J. Thurston

N.R.A.
Institute for Legislative Action

Dear Mr. Thurston

I wish to thank the I.L.A. for
their help in clarifying the figures of the
overcontribution. Enclosed you will find a
check for that amount. Thank you very
much, and I look forward to working
with you in the future campaign to
come.

Sincerely

Norman A. Jensvold

refund deposited into
8/17/79
JAW

"The Second Amendment is NOT expendable."

LaRue Tweedy, Chairman
10932 Oxborough Avenue
Bloomington, Minnesota 55431

Norman A. Jensvold, Treasurer
17299 Flagstaff Avenue
Farmington, Minnesota 55024

Jon Willand, Press Secretary
145 Malcolm Avenue, Southeast
Minneapolis, Minnesota 55414

1040454368

84040454369

ATTACHMENT #10

REPORTS ANALYSIS REFERRAL SHEET

DATE _____ ANALYST Mark Kleirman
TO: Office of General Counsel TEAM CHIEF Steve Hims
THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW _____
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: Minnesota Gun Owners' Political Victory Fund
TREASURER: Michael Slaback
ADDRESS: 2535 Clinton Avenue South, #207
Minneapolis, MN 55404
AFFILIATE(S): None

ALLEGATION(S): Excessive transfer received from another political committee CITE: 2 U.S.C. 441a SEE ATTACHMENT(S) #5

DATE INITIATED: 4-20-79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other: _____ ATTACHMENT
 Special Project: _____

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-25-78 TO 12-31-78
TOTAL RECEIPTS \$ 2637 TOTAL EXPENDITURES \$ 2078
CASH ON HAND \$ 181 DEBTS \$ 0

HISTORY:
RESULTS OF REVIEW: Request For Additional Information sent 4-20-79 ATTACHMENT #2
Response 5-23-79 #3
Surface Violation letter sent 6-29-79 #5
Response 7-12-79 #6
Response 8-1-79 #8

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT #4
Telecon: 5-29-79 #7
Telecon: 8-1-79

REASON(S) FOR REFERRAL: Exceeds threshold ATTACHMENT

OTHER PENDING ACTIONS INITIATED BY RAD: None ATTACHMENT

OTHER RELEVANT INFORMATION: Cross-reference with NRA Political Victory Fund ATTACHMENT #9
Committee refunded excessive amount to connected organization of NRA SEE ATTACHMENT #8
Political Victory Fund

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

84040454370

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/21/79 ANALYST Mark Kleinman
TO: Office of General Counsel TEAM CHIEF Steve Mims
THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: Minnesota Gun Owners' Political Victory Fund
TREASURER: Michael Slaback
ADDRESS: 2535 Clinton Avenue South, #207
Minneapolis, MN 55404
AFFILIATE(S): None

ALLEGATION(S): Excessive transfer received from another political committee CITE: 2 U.S.C. 441a SEE ATTACHMENT(S) #5

DATE INITIATED: 4-20-79

MANNER IN WHICH REVIEW WAS INITIATED:

- Normal Review
- Other:
- Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-25-78 TO 12-31-78

TOTAL RECEIPTS \$ 2637 TOTAL EXPENDITURES \$ 2378

CASH ON HAND \$ 181 DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW: Request For Additional Information sent 4-20-79 ATTACHMENT #2
Response 5-23-79 #3
Surface Violation letter sent 6-29-79 #5
Response 7-12-79 #6
Response 8-1-79 #8

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT #4
Telecon: 5-29-79 #7
Telecon: 8-1-79

REASON(S) FOR REFERRAL: Exceeds threshold ATTACHMENT

OTHER PENDING ACTIONS INITIATED BY RAD: None ATTACHMENT

OTHER RELEVANT INFORMATION: Cross-reference with NRA Political Victory Fund ATTACHMENT #9
Committee refunded excessive amount to connected organization of NRA Political Victory Fund SEE ATTACHMENT #8

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

REPORTS ANALYSIS REFERRAL SHEET

DATE _____ ANALYST Mark Kleinman
TO: Office of General Counsel TEAM CHIEF Steve Mims
THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW _____
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: NRA Political Victory Fund
TREASURER: James Featherstone
ADDRESS: 1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036
AFFILIATE(S): None

ALLEGATION(S): Receipt of corporate contributions CITE: 2 U.S.C. 441b SEE ATTACHMENT(S) #4
Excessive transfer to another political committee CITE: 2 U.S.C. 441a SEE #6
DATE INITIATED: 5-16-79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other: _____ ATTACHMENT
 Special Project: _____

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment J.

PERIOD COVERED FROM 11-28-78 TO 2-28-79
TOTAL RECEIPTS \$ 8,162 TOTAL EXPENDITURES \$ 224,432
CASH ON HAND \$ 76,419 DEBITS \$ 0

HISTORY:
RESULTS OF REVIEW: Request For Additional Information sent 5-16-79 ATTACHMENT #2
Response 6-5-79 #4
Surface Violation letter sent 6-29-79 #6
Response 7-10-79 #8
Response 8-17-79 #9

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
Telecon: 5-30-79 #3
Telecon: 7-5-79 #7

REASON(S) FOR REFERRAL: Both allegations exceed thresholds ATTACHMENT
Services rendered by connected organization not excluded in definition of contribution per 2 U.S.C. 441b(b)(2).

OTHER PENDING ACTIONS INITIATED BY RAD: None ATTACHMENT

OTHER RELEVANT INFORMATION: Additional corporate contributions ATTACHMENT #5
Contribution refund not reported on October 10 Quarterly Report
Cross-reference with Minnesota Gun Owners Political Victory Fund ATTACHMENT #10

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

84040454372

ATTACHMENT #1

84040454373



NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
MINNESOTA GUN OWNERS' POLITICAL VICTORY FUND	CONNECTED ORGANIZATION: NONE							ID# C00101113
	1978 STATEMENT OF ORGANIZATION					7AUG78	4	78FEC/082/1275
	REQUEST FOR ADDITIONAL INFORMATION					29SEP78	4	78FEC/086/2412
	STATEMENT OF ORGANIZATION- AMENDMENT					20CT78	2	78FEC/086/5029
	STATEMENT OF ORGANIZATION- AMENDMENT					130CT78	4	78FEC/089/3996
	STATEMENT OF ORGANIZATION- AMENDMENT					6NOV78	2	78FEC/095/2282
	10 DAY PRE-PRIMARY	7,203		6,428		28JUN78 - 28AUG78	8	78FEC/083/5183
	REQUEST FOR ADDITIONAL INFORMATION					28JUN78 - 28AUG78	4	78FEC/085/1845
	10 DAY PRE-PRIMARY - AMENDMENT					28JUN78 - 28AUG78	5	78FEC/086/3213
	30 DAY POST-PRIMARY	1,989		4,101		29AUG78 - 20CT78	4	78FEC/089/4000
	REQUEST FOR ADDITIONAL INFORMATION					29AUG78 - 20CT78	2	79FEC/125/5501
	30 DAY POST-PRIMARY - AMENDMENT					29AUG78 - 20CT78	1	79FEC/128/1024
	10 DAY PRE-GENERAL	1,564		1,794		30CT78 - 240CT78	5	78FEC/095/2277
	30 DAY POST-GENERAL	2,465		1,970		250CT78 - 7DEC78	5	79FEC/116/4914
	REQUEST FOR ADDITIONAL INFORMATION					250CT78 - 7DEC78	3	79FEC/125/5503
	REQUEST FOR ADDITIONAL INFORMATION					250CT78 - 7DEC78	2	79FEC/130/0149
	30 DAY POST-GENERAL - AMENDMENT					250CT78 - 7DEC78	2	79FEC/128/0392
	30 DAY POST-GENERAL - AMENDMENT					250CT78 - 7DEC78	2	79FEC/132/0013
	30 DAY POST-GENERAL - AMENDMENT					250CT78 - 7DEC78	4	79FEC/134/0694
	YEAR END REPORT		162		108	8DEC78 - 31DEC78	3	79FEC/114/4921
	TOTAL	13,383	0	14,401	0		48	TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 13NOV79
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
MINNESOTA GUN OWNERS' POLITICAL VICTORY FUND								ID# C00101113
CONNECTED ORGANIZATION: NONE								
	1979 STATEMENT OF ORGANIZATION- AMENDMENT					17JAN79	3	79FEC/117/1987
	STATEMENT OF ORGANIZATION- AMENDMENT					5JUN79	5	79FEC/128/2419
	STATEMENT OF ORGANIZATION- AMENDMENT					27AUG79	4	79FEC/135/2326
	MISCELLANEOUS TRANSACTION TO F.E.C.					9OCT79	2	79FEC/137/5700
	APRIL 10 QUARTERLY	326		690		1JAN79 - 31MAR79	3	79FEC/123/1945
	APRIL 10 QUARTERLY - AMENDMENT					31MAR79	4	79FEC/131/3829
	OCTOBER 10 QUARTERLY 3A - POSTCARD					1JUL79 - 30SEP79	2	79FEC/139/4635
	TOTAL	326	0	690	0		23	TOTAL PAGES

ALL REPORTS HAVE RECEIVED BASIC REVIEW

ATTACHMENT #2

84040454376

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

TO: MINNESOTA GUN OWNERS' POLITICAL
VICTORY FUND

DATE: 20 APR 1979
I.D. NO.: C00101113

REQUEST FOR ADDITIONAL INFORMATION FOR THE 30 Day Post-General REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 10-25-78 THROUGH 11-7-78
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

- Coverage Dates: omitted or incorrect
- Summary Page Line(s): Column(s): Totals: omitted or incorrect
- Detailed Summary (Page 2) Line(s): Column(s): Totals: omitted or incorrect
- Schedule Totals: disagree with Detailed Summary (Page 2) or omitted
- Date(s): omitted or inadequate for Schedule(s) Line(s)
- Full Name(s)/Mailing Address(es): omitted or inadequate for Schedule(s) Line(s)
- Occupation/Principal Place(s) of Business: omitted or inadequate for Schedule(s) Line(s)
- Election Designation: omitted or inadequate for Schedule(s) Line(s)
- Aggregate Year-to-Date Totals: omitted or inadequate for Schedule(s) Line(s)
- Nature or Purpose of Expenditure: omitted or inadequate for Schedule(s) B Line(s) 22 ²⁴ SEE PAGE 11
- Nature or Purpose of Receipt: omitted or inadequate for Schedule(s) A Line(s) 15b ¹⁵ SEE PAGE 11
- Inadequate Description of: proceeds dates events location of Schedule
- Signature: omitted inadequate
11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.
- Other: _____

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

MINNESOTA GUN OWNERS' POLITICAL VICTORY FUND
REQUEST FOR ADDITIONAL INFORMATION
PAGE TWO

1. Until such time as your committee establishes a separate segregated account to support Federal candidates, all receipts and expenditures must be itemized as required by 2 U.S.C. 434(b).

30 Day Post-General

1. Please be advised that all in-kind contributions should be shown on Line 22c of the Detailed Summary Page and Schedule B accordingly.

2. On Line 15b of Schedule A, National Rifle Association PVF is reported to have contributed \$5500 to your committee. Please be advised that 2 U.S.C. 441a(a)(1) prohibits a committee from making contributions to other political committees in excess of \$5,000 annually. Please clarify the aggregate year-to-date amount contributed.

8 1 0 4 0 4 5 4 3 7 8

ATTACHMENT #3

84040454379



RECEIVED
FEDERAL ELECTION
COMMISSION

79 MAY 23 PM 12:33

MINNESOTA GUN OWNERS' POLITICAL VICTORY FUND

~~12952 Nicollet Avenue
Burnsville, Minnesota 55337~~
12952 Nicollet Avenue
Burnsville, Minnesota 55337

15 May 1979

Mr. Mark Kleinman
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Dear Mr. Kleinman:

Sorry for the delay in replying but the letter was forwarded to our former treasurer, who is out on the coast, and then mailed back. The above address is the fund's address and we thought we indicated the change on the form which we forwarded some time ago. We'll respond to your inquiry point by point.

Report of October 25-November 7, 1978

1. We don't know what to do with this one. We printed a bumper sticker on behalf of the federal candidate's opponent, as indicated in our previous report (to which our note referred). We got no money or support from the federal candidate's committee and gave them only a couple of souvenir stickers. But because we had mentioned to them that we were going to put out a bumper sticker we might not be able to call it an independent expenditure — or we might; we got conflicting advice on this. What is the best classification of this?

2. Yes, we did accept \$5,500 from the NRA PVF. As we read the law we did not think it was legal, but the donor's attorney advised us that it was legal. I think our former treasurer was told that we could accept \$5,000 before the generals and the same amount after. Are there any exceptions to the citation made by you? If we have accepted too much, can this be remedied by returning the excess amount? We're not very active in the off-election year and it will give us some difficulty to raise the money, but we'll undertake the task if necessary.

Report of August 22-October 2, 1978

1. Again we're not sure what you mean. We're not required to report all receipts, only those over a certain amount, which we've done completely, since we did not distinguish between state and federal. We had many small donors who had only a few dollars to give. Similarly, I think the former treasurer did report the reportable expenses. What more would you like us to report? Would you like a copy of our state report for a roughly comparable period? Thank you.

"The Second Amendment is NOT expendable."

Yours truly,
Bruce Tweedy
Bruce Tweedy, Treasurer
12952 Nicollet Ave
Burnsville, Minn. 55337
Minneapolis, Minnesota 55414

LaRue Tweedy, Chairman
10932 Oxborough Avenue
Bloomington, Minnesota 55431

~~Norman A. Jansvold, Treasurer
1799 Flagstaff Avenue
Bloomington, Minnesota 55425~~
XXXXXXXXXXXXXXXXXXXX
XXXXXXXXXXXXXXXXXXXX
XXXXXXXXXXXXXXXXXXXX

84040454390

ATTACHMENT #4

84040454381

TELECON TO THE FILE: MINNESOTA GUN OWNERS POLITICAL VICTORY FUND

FROM: ROBERT SNOW

DATE: 5-29-79

RE: Response to RFAI

In response to Request For Additional Information, Mr. Bruce Tweedy, Treasurer (612) 435-8501, returned my call of 5-24-79. The response indicates that the committee had accepted \$586 over the permissible amount. I informed the caller that the committee must refund the excessive amount to the NRA Political Victory Fund. In addition, I mentioned that there was a discrepancy in the amount reported by the two committees of \$86. I informed Mr. Tweedy that the committee should also file an amendment to the appropriate report to show the \$86 which was an in-kind contribution, on Line 22c.

Mr. Tweedy mentioned that he was not the treasurer at the time of the violation. I told him that he nevertheless had to take corrective action.

Mr. Tweedy asked that I call Mr. Jon Willin, Secretary of committee, and inform him of the outstanding problem. I agreed to do so. I further advised the caller that a Surface Violation letter would be sent to both his committee and the NRA Political Victory Fund regarding the excessive contribution.

Bruce Tweedy, Treasurer
(612) 435-8501

Note: I also spoke with Jon Willin later in the day (612) 378-9697 and reiterated the above to him.

Jon Willin, Secretary
(612) 378-9697

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84040454383

ATTACHMENT #5





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Bruce Tweedy, Treasurer
Minnesota Gun Owners Political
Victory Fund
12952 Nicollet Avenue
Burnsville, Minnesota 55337

June 29, 1979

Dear Mr. Tweedy:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, (the Act) as amended. During the review of the 30 Day Post-General Report of Receipts and Expenditures, we noticed entries indicating that you may have received contributions which exceed the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act prohibits political committees from making contributions to any other political committee in any calendar year which, in the aggregate, exceed \$5,000.

If you find that the entries in question are incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Alternatively, if you find that you have received contributions in excess of the limits set forth in the Act, the Commission recommends that you notify the donors and refund the amounts in excess of \$5,000. These returns should be reported immediately by letter and should be reflected as contribution refunds on your next report of receipts and expenditures.

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions, please do not hesitate to contact Mark Kleinman, (800) 424-9530, our Reports Analyst assigned to you. Our local number is (202) 357-0026.

Sincerely,

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

R 4 0 4 0 4 5 4 3 8 4

1978
 and Election Commission
 75 K Street, N.W.
 Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 1 of 1 for

Line Number 14 & 15
 (have no extra forms
 to do separately)
 (Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full			
Minnesota Gun Owners Political Victory Fund			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Margaret Gustafson 715 Birch Street Anoka, Minn 55303	Geith Pharmacy	8-7-78	\$500.
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation Clerk		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$ 500		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Ronald Jerch 16440 Quartz Avenue Anoka, Minn 55303	16440 Quartz Ave. Anoka, Minn. 55303	8-21-78	\$500
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Mrs. Ronald Jerch 16440 Quartz Avenue Anoka, Minn. 55303	N.A.	8-21-78	\$500
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation Housewife		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
N.R.A. Political Victory Fund 1600 Rhode Island Avenue N.W. Washington, D.C. 20036	1600 Rhode Island Ave. Washington, D.C.	8-9-78 8-23-78	\$2000. 2500
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$ 4500		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$		
SUBTOTAL of receipts this page (optional)			\$6000.
TOTAL this period (last page this line number only)			\$6000.

SCHEDULE B
REVISED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions in-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page 1 of 11 for
 Line Number 22b

(Use Separate Schedules for
 each numbered line)

84040454386

Name of Candidate or Committee in Full			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
NRA Political Victory Fund	Contribution	8-2-78	100.00
Citizens for Cochran P.O. Box 55110 Washington, DC 20022	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Minnesota Gun Owners' Political Victory Fund 17299 Flagstaff Avenue Farmington, MN 55024	Contribution	8-2-78	2,500.00
Minnesota Gun Owners' Political Victory Fund 17299 Flagstaff Avenue Farmington, MN 55024	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Campaign Committee for Lamar Gudger P.O. Box 8042 Washington, DC 20024	Contribution	8-7-78	100.00
Campaign Committee for Lamar Gudger P.O. Box 8042 Washington, DC 20024	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Friends for Jim Abdnor 1701 N. Kent Street Suite 802 Rosslyn, VA 22209	Contribution	8-7-78	100.00
Friends for Jim Abdnor 1701 N. Kent Street Suite 802 Rosslyn, VA 22209	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Friends of Paul Tribble 12284 Warwick Blvd Suite 2-H Newport News, VA 23606	Contribution	8-7-78	100.00
Friends of Paul Tribble 12284 Warwick Blvd Suite 2-H Newport News, VA 23606	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Friends of Bob Livingston Committee P.O. Box 7111 New Orleans, LA 70186	Contribution	8-7-78	125.00
Friends of Bob Livingston Committee P.O. Box 7111 New Orleans, LA 70186	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Jerry Huckaby Re-election Committee P.O. Box 24026, SW Station Washington, DC 20024	Contribution	8-7-78	100.00
Jerry Huckaby Re-election Committee P.O. Box 24026, SW Station Washington, DC 20024	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Cranes in Congress Committee 1500 Wilson Blvd. Suite 515 Arlington, VA 22209	Contribution	8-7-78	200.00
Cranes in Congress Committee 1500 Wilson Blvd. Suite 515 Arlington, VA 22209	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			3,325.00
TOTAL this period (last page this line number only)			3

SCHEDULE B
REVISED
 January, 1978
 Federal Election Commission
 325 K Street, N.W.
 Washington, D.C. 20463

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page 10 of 11 for
 Line Number 22b

(Use Separate Schedules for
 each numbered line)

7 8 4 0 4 0 4 5 4 3 8 7

Name of Candidate or Committee in Full			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
NRA Political Victory Fund			
Minnesota Gun Owners Political Victory Fund 17299 Flagstaff Avenue Farmington, MN 55024	Political Contribution Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	8-23-78	2,000.00
Friends of Avi Nelson 89 State Street, Suite 730 Boston, Mass. 02109	Campaign Contribution Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	8-24-78	2,500.00
Citizens and Sportsmen against Richard Rynd 3222 Midfield Road Pikesville, MD 21208	Political Contribution Maryland Legislature Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	8-30-78	600.00
Whetmough for Delegate Campaign 7527 Kenlea Avenue Baltimore, MD 21236	Campaign Contribution Maryland Legislature Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	8-29-78	1,000.00
The Sportsmans Political Action Committee 121 East 31st Street New York, NY 10016	Political Contribution Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8-30-78	2,500.00
Goldwater Committee '78 P.O. Box 23412 L'Enfant Plaza Station Washington, DC 20024	Contribution Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8-24-78	100.00
Committee to Re-elect Congress- man Deferetti c/o Joan Franco, Treasurer 635 East 38th Street New York, NY 10017	Contribution Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8-24-78	100.00
The Bacham Congressional Comm. P.O. Box 2421 Newport Beach, CA 92660	Contribution Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8-24-78	200.00
SUBTOTAL of expenditures this page (optional)			\$ 9,000.00
TOTAL this period (last page this line number only)			\$

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 1 for

Line Number _____

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full
Minnesota Gun Owners' Political Victory Fund

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Gun Owners of America PVF 443 Capitol Mall Sacramento, California 95814	same C 00030999 Occupation ?	31 Oct. '78	500.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00			
National Rifle Association PVF 1600 Rhode Island Avenue, N.W. Washington, D.C. C 00053533	same Occupation ?	6 Nov. '78	1,000.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 5,500.00			
Joe Willand 145 Malcolm Ave. S.E. Minneapolis, Minn. 55414	none Occupation historian	abt. 15 Nov. '78	158.20 (loan)
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 579.30			
4 0			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
7 C			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			

TOTAL of receipts this page (optional) \$
 TOTAL this period (last page this line number only) \$ 1,658.20

Commission
 1101 N.W.
 Wash, D.C. 20463

ITEMIZED LIST
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Line number _____

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full

NRA POLITICAL VICTORY FUND

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Minnesota Gun Owners Political Victory Fund 60010113	Minnesota Senatorial Democratic Primary - Travel Expenses Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	9-26-78	\$ 86.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Ex		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period

Minnesota Gun Owners Political Victory Fund does not disclose the receipt of this in kind contribution from NRA Political Victory Fund.

8404045490

SUBTOTAL of expenditures this page (optional)	\$ 86.00
TOTAL this period (last page this line number only)	\$ 86.00

1978
Election Commission
K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES
(Separating, Transfers Out, Contributions in-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 1 of 1 for
Line Number 22c

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

NRA POLITICAL VICTORY FUND

✓

Full Name, Mailing Address and ZIP Code
Susan E. Racce

C00054361

Particulars of Expenditure
Travel expense to assist
campaign of Mark W. Hannaford

Date (month,
day, year)
12/1/78

Amount of each expendi-
ture this period
\$ 12.81

Expenditure for:
 Primary General Other

Full Name, Mailing Address and ZIP Code
Archer Air Courier
Division of Archer Courier Sys.
855 Avenue of the Americas
New York, NY 10001

Particulars of Expenditure
Air Freight delivery of
cheshire lables to Minn. Gen
Owners PVF

Date (month,
day, year)
12/4/78

Amount of each expendi-
ture this period
112.00

Expenditure for:
 Primary General Other

Full Name, Mailing Address and ZIP Code
Swift Mailing Service, Inc.

Particulars of Expenditure
Comm. advocating election
of R. Boshwitz, A. Quie &
H. Knutson in Minn. Gen Ele.

Date (month,
day, year)
12/11/78

Amount of each expendi-
ture this period
339.76

Expenditure for:
 Primary General Other

Full Name, Mailing Address and ZIP Code
NRA Institute for Legislative
Action

Particulars of Expenditure
Travel to assist campaign
of Mark W. Hannaford

Date (month,
day, year)
12/27/78

Amount of each expendi-
ture this period
414.00

Expenditure for:
 Primary General Other

Full Name, Mailing Address and ZIP Code
Metro Printing & Mailing Service
8446 Lee Highway
Fairfax, VA 22031

Particulars of Expenditure
Comm. advocating the election
of R. Boshwitz, A. Quie &
H. Knutson

Date (month,
day, year)
12/28/78

Amount of each expendi-
ture this period
369.68

Expenditure for:
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:
 Primary General Other

SUBTOTAL of expenditures this page (optional).....

\$ 1,248.25

TOTAL this period (last page this line number only).....

\$ 1,248.25

1
9
3
4
5
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0
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0
4
0

ATTACHMENT #6

84040454392



RECEIVED
FEDERAL ELECTION
COMMISSION

JUL 12 PM 1:05

MINNESOTA GUN OWNERS' POLITICAL VICTORY FUND

17299-Flagstaff Avenue
Farmington, Minnesota 55024

TO: MR MARK Kleinman
Federal Election Commission

July 5 1979

Dear Mr. Kleinman,

I received notice from the N.R.A. Political Victory fund of the exact amount of their over-contributions, and know we are in the process of obtaining those funds. The money owed to the N.R.A. P.V.F. will be returned shortly.

I am personally sorry for any delays, but we have been waiting for all the figures before reacting

sincerely
Bruce C Tweedy
Treasurer

"The Second Amendment is NOT expendable."

LaRue Tweedy, Chairman
10932 Oxborough Avenue
Bloomington, Minnesota 55431

Norman A. Jensenfeld, Treasurer
17299 Flagstaff Avenue
Farmington, Minnesota 55024

Jon Willard, Press Secretary
145 Malcolm Avenue, Southeast
Minneapolis, Minnesota 55414

84040454393

ATTACHMENT #7

84040454394



TELECON TO THE FILES: MINNESOTA GUN OWNERS POLITICAL VICTORY FUND

FROM: MARK KLEINMAN

DATE: 8-1-79

RE: SV letter excessive transfer from NRA Political Victory Fund

I spoke with Mr. Jon Willand, (612) 378-9697. I explained to him that there was a discrepancy in the total amount reported by NRA Political Victory Fund and their committee. The NRA reported

1. \$86 In-Kind Contribution on 9-26-78 to Minnesota Gun Owners
2. \$112 Purchase of cheshire labels.

I told him that the NRA would be refunding an amount equal to \$698, because the total amount contributed was \$5698. I stated that in showing the receipt of the refunded amount, that he should also send in a amendment to show the proper receipt of these two in-kind contributions. He stated further that they were not reported by him, because the NRA had not told them of these expenditures. I told him to also show these as memo entries on Line 20a of Schedule B.

He stated that they would respond accordingly.

(612) 378-9697
Jon Willand, Press Secretary

84040454395

ATTACHMENT #8

84040454396



NRA Political Victory Fund

Institute for Legislative Action
P.O. Box 2019, Washington, D.C. 20013

RECEIVED
FEDERAL ELECTION
COMMISSION

19 AUG 11 AM 11:38

Vict Report 2

June 13, 1979

Mr. Bruce Tweedy, Treasurer
Minnesota Gun Owners
Political Victory Fund
12952 Nicollett Avenue, South
No. 202
Burnsville, MN 55337

Dear Mr. Tweedy:

An examination of our records discloses that the NRA Political Victory Fund inadvertently overcontributed to your committee in calendar year 1978; in the sum of \$698. That figure was arrived at by totaling the following contributions:

<u>Date</u>	<u>Check Number</u>	<u>Page</u>	<u>Amount</u>	<u>Purpose</u>
8/7/78	(wired)	Minnesota Gun Owners-PVF	2500	Contribution
8/23/78	1096	Minnesota Gun Owners-PVF	2000	Contribution
9/26/78	1215	NRA Institute for Legislative Action	86	In-kind contribution for travel of Minn. Gun Owners-PVF Treasurer, N. Jensvold
11/3/78	(wired)	Minnesota Gun Owners-PVF	1000	Contribution
12/4/78	1490	Archer Air Courier	(112)	Freight costs to send labels to Minnesota Gun Owners-PVF

It would be greatly appreciated if this oversight were corrected by the return as soon as possible of \$698.

Thank you for your understanding and assistance.

Sincerely,

James J. Featherstone
James J. Featherstone
Treasurer

JJF:jmb

84040454307



MINNESOTA GUN OWNERS' POLITICAL VICTORY FUND

17299 Flagstaff Avenue
Farmington, Minnesota 55024

July 30 1979

Mr. James J. Fetherling

N.R.A.

Institute for Legislative Action

Dear Mr. Fetherling

I wish to thank the I.L.A. for their help in clarifying the figures of the overcontribution. Enclosed you will find a cheque for that amount. Thank you very much, and I look forward to working with you in the future campaign to come.

Sincerely

Benjamin L. Trench

"The Second Amendment is NOT expendable."

LaRue Tweedy, Chairman
10932 Oxborough Avenue
Bloomington, Minnesota 55431

Norman A. Jensvold, Treasurer
17299 Flagstaff Avenue
Farmington, Minnesota 55024

Jon Willand, Press Secretary
145 Malcolm Avenue, Southeast
Minneapolis, Minnesota 55414

84040454308

84040454399



MINN. GUN OWNERS POLITICAL VICTORY FUND
BRUCE E. TWEEDY, TREASURER
12952 NICOLLET AVENUE, APT. 202
BURNSVILLE, MN 55337

204

PAY TO THE ORDER OF

N. R. A. checks for Legislative Action

July 30 1979 23-522 910

\$ 6.98 00

six hundred ninety eight and no/100 DOLLARS



FIRST NATIONAL BANK
OF BURNSVILLE
900 WEST COUNTY ROAD 42 (612) 435-9861
BURNSVILLE, MINNESOTA 55337

CAF

FOR

Refund (contribution)

Bruce Tweedy

⑆000204⑆⑆091005205⑆ 1192041739⑆

ATTACHMENT #9

84040454400



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1110

Date Filmed 5/10/84 Camera No. --- 2

Cameraman JRL

82-1110-101-410-418-415-419-421-423-425-427-429-431-433-435-437-439-441-443-445-447-449-451-453-455-457-459-461-463-465-467-469-471-473-475-477-479-481-483-485-487-489-491-493-495-497-499-501-503-505-507-509-511-513-515-517-519-521-523-525-527-529-531-533-535-537-539-541-543-545-547-549-551-553-555-557-559-561-563-565-567-569-571-573-575-577-579-581-583-585-587-589-591-593-595-597-599-601-603-605-607-609-611-613-615-617-619-621-623-625-627-629-631-633-635-637-639-641-643-645-647-649-651-653-655-657-659-661-663-665-667-669-671-673-675-677-679-681-683-685-687-689-691-693-695-697-699-701-703-705-707-709-711-713-715-717-719-721-723-725-727-729-731-733-735-737-739-741-743-745-747-749-751-753-755-757-759-761-763-765-767-769-771-773-775-777-779-781-783-785-787-789-791-793-795-797-799-801-803-805-807-809-811-813-815-817-819-821-823-825-827-829-831-833-835-837-839-841-843-845-847-849-851-853-855-857-859-861-863-865-867-869-871-873-875-877-879-881-883-885-887-889-891-893-895-897-899-901-903-905-907-909-911-913-915-917-919-921-923-925-927-929-931-933-935-937-939-941-943-945-947-949-951-953-955-957-959-961-963-965-967-969-971-973-975-977-979-981-983-985-987-989-991-993-995-997-999-1001-1003-1005-1007-1009-1011-1013-1015-1017-1019-1021-1023-1025-1027-1029-1031-1033-1035-1037-1039-1041-1043-1045-1047-1049-1051-1053-1055-1057-1059-1061-1063-1065-1067-1069-1071-1073-1075-1077-1079-1081-1083-1085-1087-1089-1091-1093-1095-1097-1099-1101-1103-1105-1107-1109-1111-1113-1115-1117-1119-1121-1123-1125-1127-1129-1131-1133-1135-1137-1139-1141-1143-1145-1147-1149-1151-1153-1155-1157-1159-1161-1163-1165-1167-1169-1171-1173-1175-1177-1179-1181-1183-1185-1187-1189-1191-1193-1195-1197-1199-1201-1203-1205-1207-1209-1211-1213-1215-1217-1219-1221-1223-1225-1227-1229-1231-1233-1235-1237-1239-1241-1243-1245-1247-1249-1251-1253-1255-1257-1259-1261-1263-1265-1267-1269-1271-1273-1275-1277-1279-1281-1283-1285-1287-1289-1291-1293-1295-1297-1299-1301-1303-1305-1307-1309-1311-1313-1315-1317-1319-1321-1323-1325-1327-1329-1331-1333-1335-1337-1339-1341-1343-1345-1347-1349-1351-1353-1355-1357-1359-1361-1363-1365-1367-1369-1371-1373-1375-1377-1379-1381-1383-1385-1387-1389-1391-1393-1395-1397-1399-1401-1403-1405-1407-1409-1411-1413-1415-1417-1419-1421-1423-1425-1427-1429-1431-1433-1435-1437-1439-1441-1443-1445-1447-1449-1451-1453-1455-1457-1459-1461-1463-1465-1467-1469-1471-1473-1475-1477-1479-1481-1483-1485-1487-1489-1491-1493-1495-1497-1499-1501-1503-1505-1507-1509-1511-1513-1515-1517-1519-1521-1523-1525-1527-1529-1531-1533-1535-1537-1539-1541-1543-1545-1547-1549-1551-1553-1555-1557-1559-1561-1563-1565-1567-1569-1571-1573-1575-1577-1579-1581-1583-1585-1587-1589-1591-1593-1595-1597-1599-1601-1603-1605-1607-1609-1611-1613-1615-1617-1619-1621-1623-1625-1627-1629-1631-1633-1635-1637-1639-1641-1643-1645-1647-1649-1651-1653-1655-1657-1659-1661-1663-1665-1667-1669-1671-1673-1675-1677-1679-1681-1683-1685-1687-1689-1691-1693-1695-1697-1699-1701-1703-1705-1707-1709-1711-1713-1715-1717-1719-1721-1723-1725-1727-1729-1731-1733-1735-1737-1739-1741-1743-1745-1747-1749-1751-1753-1755-1757-1759-1761-1763-1765-1767-1769-1771-1773-1775-1777-1779-1781-1783-1785-1787-1789-1791-1793-1795-1797-1799-1801-1803-1805-1807-1809-1811-1813-1815-1817-1819-1821-1823-1825-1827-1829-1831-1833-1835-1837-1839-1841-1843-1845-1847-1849-1851-1853-1855-1857-1859-1861-1863-1865-1867-1869-1871-1873-1875-1877-1879-1881-1883-1885-1887-1889-1891-1893-1895-1897-1899-1901-1903-1905-1907-1909-1911-1913-1915-1917-1919-1921-1923-1925-1927-1929-1931-1933-1935-1937-1939-1941-1943-1945-1947-1949-1951-1953-1955-1957-1959-1961-1963-1965-1967-1969-1971-1973-1975-1977-1979-1981-1983-1985-1987-1989-1991-1993-1995-1997-1999-2001-2003-2005-2007-2009-2011-2013-2015-2017-2019-2021-2023-2025-2027-2029-2031-2033-2035-2037-2039-2041-2043-2045-2047-2049-2051-2053-2055-2057-2059-2061-2063-2065-2067-2069-2071-2073-2075-2077-2079-2081-2083-2085-2087-2089-2091-2093-2095-2097-2099-2101-2103-2105-2107-2109-2111-2113-2115-2117-2119-2121-2123-2125-2127-2129-2131-2133-2135-2137-2139-2141-2143-2145-2147-2149-2151-2153-2155-2157-2159-2161-2163-2165-2167-2169-2171-2173-2175-2177-2179-2181-2183-2185-2187-2189-2191-2193-2195-2197-2199-2201-2203-2205-2207-2209-2211-2213-2215-2217-2219-2221-2223-2225-2227-2229-2231-2233-2235-2237-2239-2241-2243-2245-2247-2249-2251-2253-2255-2257-2259-2261-2263-2265-2267-2269-2271-2273-2275-2277-2279-2281-2283-2285-2287-2289-2291-2293-2295-2297-2299-2301-2303-2305-2307-2309-2311-2313-2315-2317-2319-2321-2323-2325-2327-2329-2331-2333-2335-2337-2339-2341-2343-2345-2347-2349-2351-2353-2355-2357-2359-2361-2363-2365-2367-2369-2371-2373-2375-2377-2379-2381-2383-2385-2387-2389-2391-2393-2395-2397-2399-2401-2403-2405-2407-2409-2411-2413-2415-2417-2419-2421-2423-2425-2427-2429-2431-2433-2435-2437-2439-2441-2443-2445-2447-2449-2451-2453-2455-2457-2459-2461-2463-2465-2467-2469-2471-2473-2475-2477-2479-2481-2483-2485-2487-2489-2491-2493-2495-2497-2499-2501-2503-2505-2507-2509-2511-2513-2515-2517-2519-2521-2523-25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