

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: April 2, 2019

ANALYST: Kevin McQueen

I. ORGANIZATION: National Rifle Association Institute for
Legislative Action
C70000716
Robert G. Owens
11250 Waples Mill Road
Fairfax, VA 22030

II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(4)
11 CFR § 104.6

III. BACKGROUND:

Partisan Internal Communications (Failure to Disclose All Financial Activity)

National Rifle Association Institute for Legislative Action ("the Organization") amended its 2018 12 Day Pre-General Report to disclose additional disbursements totaling \$104,813.99, which were not disclosed on the original report (Attachment 2).

On October 25, 2018, the Organization filed the 2018 12 Day Pre-General Report covering the period of October 1, 2018 through October 17, 2018. The report disclosed \$16,194.71 in disbursements for Total Communications Cost for This Period under the Summary of Communication Costs (Image 201810259130882457).

On November 3, 2018, the Organization filed an Amended 2018 12 Day Pre-General Report. The report disclosed \$121,008.70 in disbursements for Total Communications Cost for This Period under the Summary of Communication Costs, an increase of \$104,813.99 from the original report (Image 201811039133585552).

On November 27, 2018, a Request for Additional information (RFAI) was sent to the Organization referencing the Amended 2018 12 Day Pre-General Report, received November 3, 2018. The RFAI requested clarification regarding the substantial increase in

disbursements disclosed on the Amended 2018 12 Day Pre-General Report (Image 201811280300025895).

On December 4, 2018, Karen Kullivan called the Reports Analysis Division (RAD) Analyst to ask how the Organization should respond to the RFAI referencing the increase in activity on their Amended 2018 12 Day Pre-General Report. The Analyst explained that the Organization should submit an explanation for the increase in activity. The Analyst noted that regardless of the explanation provided by the Organization, the issue could be referred for further action, and encouraged the Organization to add any additional information to the public record should it wish to do so (Attachment 3).

On December 18, 2018, the Organization filed an FEC Form 99 (Miscellaneous Electronic Submission), which stated:

"This response addresses the question presented in your letter of November 27, 2018; namely, why the information disclosed on the 12-Day Pre-General Communication Costs report amendment filed on November 3, 2018 was not disclosed on the original report. The information disclosed on the amendment was inadvertently overlooked when the original report was prepared.

Invoices related to federal candidate advocacy were incorrectly coded in the accounting system as non-federal candidate advocacy and as a result not included in the committee's 12-Day Pre-General Report.

We place great emphasis on compliance with federal election law, and we understand that fair elections depend on the availability of complete and accurate information to the electorate. Therefore, when this error was detected during our month-end accounting close process, an amendment was immediately filed to reflect the allocated cost of the federal candidate advocacy communications previously excluded. We would like to stress the fact that the information provided to the electorate was complete and accurate before the November 6 election" (Image 201812189143567664).

To date, no further communications have been received from the Organization regarding this matter.

O-Index (2019-2020)

Cmte. ID: C70000716 Cmte. Name: NATIONAL RIFLE ASSOCIATION INSTITUTE FOR LEGISLATIVE ACTION
 Treasurer Name: OWENS, ROBERT G Address: 11250 WAPLES MILL ROAD, FAIRFAX, VA 22030

Cmte. Type: C (COMMUNICATION COST) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	AI	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
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No records were found for this cycle.

O-Index (2017-2018)

Cmte. ID: C70000716 Cmte. Name: NATIONAL RIFLE ASSOCIATION INSTITUTE FOR LEGISLATIVE ACTION
 Treasurer Name: OWENS, ROBERT G Address: 11250 WAPLES MILL ROAD, FAIRFAX, VA 22030

Cmte. Type: C (COMMUNICATION COST) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

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MS-T			12/18/2018	1	201812189143567664			11/21/2018							
RQ2	12G	A	11/21/2018	2	201811280300025695										
F7N	Q1	N	4/12/2017	1	201704129052084706	1/1/2017	3/31/2017				\$0				
F7N	Q2	N	7/11/2017	3	201707190565898674	4/1/2017	6/30/2017				\$35,167				
F7N	Q3	N	10/12/2017	3	201710129075614415	7/1/2017	9/30/2017				\$105,288				
F7N	YE	N	1/13/2018	1	201801139090408507	10/1/2017	12/31/2017				\$19,988				
F7N	Q1	N	4/9/2018	2	201804099104798026	1/1/2018	3/31/2018				\$17,243				
F7N	Q2	N	7/13/2018	3	201807139115411590	4/1/2018	6/30/2018				\$111,373				
F7N	Q3	N	10/11/2018	1	201810119124485664	7/1/2018	9/30/2018				\$4,263				
F7A	12G	A	11/3/2018	4	201811039133585552	10/1/2018	10/17/2018				\$121,008				
F7N	12G	N	10/25/2018	1	201810259130882457	10/1/2018	10/17/2018				\$16,194				
F7N	YE	N	1/31/2019	37	201901319145394703	10/18/2018	12/31/2018				\$147,291				
Totals										\$0	\$577,820				

O-Index (2015-2016)

Cmte. ID: C70000716 Cmte. Name: NATIONAL RIFLE ASSOCIATION INSTITUTE FOR LEGISLATIVE ACTION
 Treasurer Name: OWENS, ROBERT G Address: 11250 WAPLES MILL ROAD, FAIRFAX, VA 22030

Cmte. Type: C (COMMUNICATION COST) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

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F7N	Q1	N	4/14/2015	1	15951129785	1/1/2015	3/31/2015				\$0				
F7N	Q2	N	7/1/2015	1	201507019000051682	4/1/2015	6/30/2015				\$5,095				
F7N	Q3	N	10/12/2015	1	201510129002839332	7/1/2015	9/30/2015				\$115				
F7N	YE	N	1/13/2016	1	2016011390004483318	10/1/2015	12/31/2015				\$0				
F7N	Q1	N	4/14/2016	3	201604149012332216	1/1/2016	3/31/2016				\$196,689				
F7N	Q2	N	7/8/2016	4	201607089020383787	4/1/2016	6/30/2016				\$56,642				
F7N	Q3	N	10/14/2016	5	201610149032515910	7/1/2016	9/30/2016				\$130,612				
F7N	YE	N	1/30/2017	81	201701308041559837	10/1/2016	12/31/2016				\$1,427,297				
Totals										\$0	\$1,816,452				

**National Rifle Association Institute for Legislative Action
(C70000716)
12 Day Pre-General Report/Amended 2018 12 Day Pre-General Report**

Overview of Additional Disbursements

Report Line	2018 12 Day Pre-General Report (Image 201810259130882457)	Amended 2018 12 Day Pre-General Report, received 11/3/18 (Image 201811039133585552)	Variance Amount
Total Communications Cost for This Period	\$16,194.71	\$121,008.70	\$104,813.99
		Total:	\$104,813.99