



FEDERAL ELECTION COMMISSION  
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2019 APR -5 AM 8:45

**SENSITIVE**

**MEMORANDUM**

April 4, 2019

TO: The Commission

THROUGH: Alec Palmer *AP by PTH*  
Staff Director

FROM: Patricia C. O'rourke *PCO*  
Chief Compliance Officer

Krista J. Roche *KJR*  
Director, ADR Office

SUBJECT: ADR 910 National Rifle Association (NRA): Institute for  
Legislative Action and Robert G. Owens, Fiscal Officer,  
Informational Memo on Assignment

The Reports Analysis Division referred RAD 19L-08 for processing on April 2, 2019, and the ADR Office designated the referral ADR 910. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 910 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

**Summary of Case:** The Reports Analysis Division (RAD) referred National Rifle Association Institute for Legislative Action and Robert G. Owens, Fiscal Officer (Respondents or the Organization) for failing to disclose all financial activity on its 2018 12 Day Pre-General Report, originally filed on October 25, 2018. On November 3, 2018, the Organization filed an Amended 2018 12 Day Pre-General Report including \$104,813.99 in additional disbursements.

In a Form 99 (Miscellaneous Electronic Submission) filed on December 18, 2018, the Respondents stated that "the information disclosed on the amendment was inadvertently overlooked when the original report was prepared." The Respondents further explained that invoices relating to federal candidate advocacy were inadvertently incorrectly coded in their accounting system and were therefore not included on the 12 Day Pre-General Report. The Respondents further contend that all information was complete and accurate before the November 6 election.