



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 9, 2019

Robert Owens, Treasurer
National Rifle Association (NRA) Institute For Legislative Action
11250 Waples Mill Road
Fairfax, VA 22030

Response Due Date
May 19, 2019

Re: ADR 910 (RAD 19L-08)
National Rifle Association (NRA) Institute For Legislative Action and Robert Owens,
Treasurer

Dear Robert Owens:

The Federal Election Commission (FEC or Commission) referred a compliance issue to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The referral by the Reports Analysis Division was based on a review of reports filed by National Rifle Association (NRA) Institute For Legislative Action which reflect a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

An email was sent to your office on April 12, 2019, regarding an opportunity to participate in the ADR program at the Commission to resolve this matter. To date, the Commission has received no response. The FEC established the ADR Program to provide an informal means for resolving matters that come before the Commission and to facilitate negotiations directly with National Rifle Association (NRA) Institute For Legislative Action and Robert Owens, Treasurer (Respondents or the Committee). The ADR Program provides Respondents with an opportunity to negotiate settlement of a matter that is mutually agreeable. The negotiations occur prior to any Commission consideration of whether there is reason to believe a violation has occurred. If negotiations are successful, the resulting settlement would conclude the matter.

The Commission, in referring the matter to the ADR Office, determined that the case is eligible for processing in the ADR program. If Respondents decide to participate in the ADR Program, you must: 1) indicate in writing a willingness to have your case submitted for ADR processing; 2) agree to participate in the bilateral interest based negotiations; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

The issues referred to the ADRO, and the focus of our subsequent negotiations are summarized as follows:

The Reports Analysis Division (RAD) referred National Rifle Association Institute for Legislative Action and Robert G. Owens, Treasurer (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.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent(s) would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR form. **Failure to respond affirmatively by May 19, 2019 will be taken as a notice of disinterest in the program and your case will be dropped from further consideration for ADR.** In that event, your case will be sent to the FEC's Office of General Counsel for further processing, and the likelihood that the Committee will be audited during the next election cycle will increase.

This matter has been designated as **ADR 910**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADRO at my direct dial as indicated below

Sincerely,



Joshua Rebollozo
ADR Specialist
Alternative Dispute Resolution Office