



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

**MEMORANDUM**

August 14, 2019

100-10001-1207

**TO:** The Commission

**THROUGH:** Alec Palmer *AP by MHT*  
Staff Director

**FROM:** Patricia C. Orrick *PCO*  
Chief Compliance Officer

**SUBJECT:** ADR 910 National Rifle Association (NRA) Institute for Legislative Action (C70000716) and Robert G. Owens, Treasurer, Recommendation to Approve Negotiated Settlement

**RESOLUTION TERMS:** Develop and implement a compliance manual; participate in an FEC conference; and pay a civil penalty of \$4,500.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 910 (RAD 19L-08). The ADR Office received this referral on April 2, 2019.

**SUMMARY:** The Reports Analysis Division (RAD) referred the 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 additionally explained that invoices relating to federal candidate advocacy were "incorrectly coded in the accounting system... and as a result not included in the committee's 12-Day Pre-General Report." The Respondents further

state that all information was complete and accurate before the general election held on November 6, 2018.

### **RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of National Rifle Association (NRA) Institute for Legislative Action and Robert G. Owens, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.