

WELDON H. CLARK JR.

**100 Heathwood Drive
Liberty, SC 29657**

March 15, 1999

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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

MAR 19 3 12 PM '99

Mr. Lawrence Noble – legal council
Federal Election Commission
999 E. NW 6 th floor
Washington, DC 20463 202-694-1000

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Dear Mr. Noble:

Please recall that I earlier forward you a complaint concerning certain irregularities about election activities conducted by the NRA and /or NRA ILA. It seems that my complaint has struck a sensitive nerve at NRA, as I am now the focus of a move to kick me out of the NRA and terminate my Benefactor membership.

As a member of the NRA Board of Directors, my complaint to the FEC was motivated by my belief that the only way I could discharge my fiduciary duty and obligation as a Board member was through the complaint. This is because NRA management has consistently refused to make requested information available to Board members, particularly information related to its political and election activities.

The facts previously forwarded to you in my complaint speak for themselves. The response I have received from NRA, a copy of which I enclose, also speaks for itself. They just do not appreciate hearing from you.

Could you please advise if there is any protection to complainants under applicable law relating complaints forwarded to the FEC for investigation?

I spoke to a Mr. Andrew Turly at your office and informed him that the way to prove the allegations in my complaint was to question former employees of NRA, NRA-ILA, Ackerman McQueen, Mercury Group Inc., Arena PAC and the vendors that they use under oath.

I have contacted the two former NRA directors who did the management audit of the National Rifle Association. They are willing to talk.

Richard L. Carone – Former chairman of the finance committee and also former Vice President of the Chase Manhattan Bank. He is presently a partner in Oil and Gas Management. His address is as follows:

1002 LaSenda
Santa Barbara, CA 93105
Office 805-899-3144 ext 33
Fax 805-899-3166

Ronin Colman – He did most of the gathering of information on the management audit of the National Rifle Association. He owns PACT in Dallas Texas.

P.O. Box 535112
Grand Prairie, TX 75053
Office 972-641-0049
Fax 972-641-2641

You should also speak to James E. Duff former assistance to the NRA treasurer. He will most likely not be friendly to your inquiry. I have heard he now works for the Smithsonian. Let me know what else I can do to assist in your investigation.

Very truly yours,

Weldon H. Clark Jr.

Weldon H. Clark Jr.
Director NRA
100 Heathwood Drive
Liberty, SC 29657

work 864-878-6331 ask for ext 4334
work fax 864-898-4005
e-mail wh.clark@cwix.com



NATIONAL RIFLE ASSOCIATION OF AMERICA

INCORPORATED 1871

**11250 WAPLES MILL ROAD
FAIRFAX, VA 22030**

**OFFICE OF THE
SECRETARY**

**(703) 267-1062
FAX (703) 267-3909**

March 1, 1999

Mr. Weldon H. Clark, Jr.
100 Heathwood Drive
Liberty, South Carolina 29657-8907

**VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED
AND FIRST CLASS MAIL**

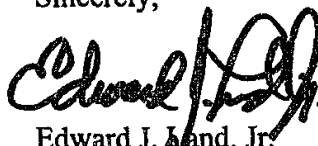
Dear Mr. Clark:

I hereby notify you that, at the meeting of the Ethics Committee on January 24, 1999, the Committee considered a matter referred to its attention by the NRA Board of Directors involving you. The Committee resolved to refer the matter to the Committee on Hearings for a hearing.

Please find enclosed copies of the following: a memorandum by the Ethics Committee to the NRA Secretary dated March 1, 1999; and a memorandum by the Ethics Committee to the Chairman of the Committee on Hearings dated March 1, 1999.

Please be informed that you have a right to a hearing. You are further informed that unless you request a hearing in writing, received by this office within thirty (30) days after the date of service of this notice, the proposed recommendation of the Ethics Committee shall be transmitted to the NRA Board of Directors for its action.

Sincerely,



Edward J. Hand, Jr.
NRA Secretary



NATIONAL RIFLE ASSOCIATION OF AMERICA
INCORPORATED 1871
11250 WAPLES MILL ROAD - FAIRFAX, VA 22030

NRA Ethics Committee
Lourdes Fleckenstein, Secretary

March 1, 1999

(703) 267-1333
Fax (703) 267-1383

Mr. Weldon H. Clark, Jr.
100 Heathwood Drive
Liberty, South Carolina 29657-8907

**VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED
AND FIRST CLASS MAIL**

Dear Mr. Clark:

This letter is to inform you that, in regard to the matter referred by the NRA Board of Directors to the Ethics Committee regarding NRA Board member Weldon H. Clark, Jr., of Liberty, South Carolina, the Ethics Committee, at its meeting of January 24, 1999, resolved as follows:

"Whereas, it has come to the attention of the NRA Legislative Policy Committee that Mr. Weldon Clark, a member of the NRA and currently holding a position of director on the NRA Board of Directors, has filed a complaint with the Federal Election Commission by way of a letter dated 24 November 1998, seeking an independent investigation into the business affairs of the National Rifle Association of America; and

"Whereas, Article III, Section 11, Subsection (b) of the Bylaws provides that a member of the NRA 'may be suspended or expelled for good cause including...conduct disruptive of the orderly operation of the Association in pursuit of its goals; (and/or) violating one's obligation of loyalty to the Association and its objectives';

"Whereas, the Legislative Policy Committee on 23 January 1999, in its report to the NRA Board, informed the Board of Mr. Clark's filing of such complaint with the Federal Election Commission, and

"Whereas, the Board of Directors referred the matter to the NRA Ethics Committee which considered the matter on 24 January 1999,

"Now, therefore, be it resolved, that the Ethics Committee finds that good grounds exist to believe that Mr. Clark filed such a complaint with the Federal Election Commission and that his actions in doing so amount to conduct disruptive of the orderly operation of

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"Be it further resolved, that the Ethics Committee hereby refers the matter to the Committee on Hearings for a hearing, directing the Committee on Hearings to resolve the following precise issues and questions:


"1) Did Mr. Weldon Clark file a complaint with the Federal Election Commission, by way of letter dated 24 November 1998, seeking an independent investigation into the business affairs of the National Rifle Association of America, and

"2) If the answer is 'yes' to question 1, does Mr. Clark's action in filing such a complaint constitute conduct disruptive of the orderly operation of the Association in pursuit of its goals; and/or does it violate his obligation of loyalty to the Association and its objectives;

"And, be it further resolved, that if the answers to questions 1 and 2 above are found by the Committee on Hearings to both be 'yes', it is the recommendation of the Ethics Committee to the Board of Directors that Mr. Weldon Clark be expelled from the membership of the NRA.

"Dated this 24th day of January 1999 in meeting assembled in Arlington, Virginia."

Sincerely,



Lourdes Fleckenstein

Secretary

Ethics Committee



NATIONAL RIFLE ASSOCIATION OF AMERICA

INCORPORATED 1871

11250 WAPLES MILL ROAD - FAIRFAX, VA 22030

NRA Ethics Committee
Lourdes Fleckenstein, Secretary

MEMORANDUM

(703) 267-1333
Fax (703) 267-1383

TO: Edward J. Land, Jr.
NRA Secretary

FROM: Lourdes Fleckenstein *LF*
Secretary, Ethics Committee

DATE: March 1, 1999

SUBJECT: Weldon H. Clark, Jr.
100 Heathwood Drive
Liberty, South Carolina 29657-8907

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cc: Wayne Anthony Ross
Chairman, Ethics Committee



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NRA Ethics Committee
Lourdes Fleckenstein, Secretary

MEMORANDUM

(703) 267-1333
Fax (703) 267-1383

TO: James W. Porter, II
Chairman, Committee on Hearings

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Secretary, Ethics Committee

DATE: March 1, 1999

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Chairman, Ethics Committee

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NRA Secretary