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July 27, 2018

Federal Election Commission
Office of Complaints Examination and Legal Administration
Attn: Jeff Jordan, Assistant General Counsel & Kathryn Ross, Paralegal
999 E Street, NW
Washington, DC 20463

Re: MUR 7314

Dear Mr. Jordan,

This is a response to the additional information submitted by American Democracy Legal Fund ("Complainant") in this MUR on June 21, 2018 ("Additional Information," cited as Add'l Inf.).

The Additional Information adds virtually nothing of significance to the original complaint ("Complaint," cited as Compl.). Most of the Additional Information is devoted to superfluous details with no probative value. All the assertions made in the Complaint and the Additional Information are hearsay, much of it anonymous and all of it unsworn, which would not adequately substantiate a reason-to-believe finding even if those statements were probative of the violations of 52 U.S.C. § 30121 (hereafter simply "FECA") that Complainant alleges NRA committed—which they are not. Nothing in the Additional Information is probative of a violation of FECA by the NRA, and none of it can overcome the sworn statements—actual evidence—provided by NRA's officers and employees, and, now, a former NRA board member and attorney.

Furthermore, there is good reason to question the reliability of the two reporters whose stories form the backbone of the Complaint and the Additional Information. "The Commission may find 'reason to believe' only if a complaint sets forth sufficient specific facts, which, if proven true, would constitute violations of the FECA. Complaints not based upon personal knowledge must

identify a source of information that reasonably gives rise to a belief in the truth of the allegations presented.”¹ The Complaint and the Additional Information fail on both counts.

Discussion

The Complaint is based upon a series of articles in the news media, beginning with an article on McClatchyDC.com on January 18, 2018, by Peter Stone and Greg Gordon, which alleged that the FBI was “investigating whether a top Russian banker [Alexander Torshin] with ties to the Kremlin illegally funneled money to the National Rifle Association to help Donald Trump win the presidency.”² The Additional Information recites claims in a series of newer articles in the media (several of them again by Stone and Gordon), which mainly rehash the assertions in the original articles as if they were new, while occasionally injecting minor new details of little to no legal significance. Broadly speaking, Complainant’s strategy appears to be to generate as much smoke as possible, in the hope that it will obscure the fact that there is no fire: neither the Complaint nor the Additional Information makes any credible allegations of specific facts that, if proven true, would constitute violations of the FECA.

For that reason, NRA sees no need for a plodding, point-by-point response to every nugatory detail breathlessly recounted in the Additional Information. The Additional Information does, however, contain a handful of particularly egregious claims that merit detailed responses, and which reveal the utterly hollow foundation upon which Complainant’s house of cards is built.

1. “Findings” by “the Senate Judiciary Committee”

Section A(iii) of the Additional Information asserts that, “the Senate Judiciary Committee reached a preliminary conclusion that ‘the Kremlin may also have used the NRA to secretly fund Mr. Trump’s campaign.’”³ This of course sounds very serious, as unsworn hearsay about the opinions of third parties goes, but God is in the detail. The citation for this claim leads first to a Stone and Gordon article, which quotes a document released not by the Senate Judiciary Committee as a whole, but by the minority members of that committee. The committee minority does not attribute its “preliminary finding” (as they characterize it) to any evidence that the committee collected. Instead, the assertion that NRA “may” have been involved in illegal foreign contributions is footnoted to the original, January 18, 2018, McClatchy article by Stone and Gordon.⁴ This

¹ MUR 4960 (Hillary Rodham Clinton for U.S. Senate Exploratory Committee, Inc.), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith and Scott E. Thomas at 1, citing 11 C.F.R. 111.4(d)(2); MUR 4545 (Clintgon/Gore ’96 Primary Comm./Amtrak); and MUR 3534 (Bibleway Church of Atlas Rd)..

² Peter Stone & Greg Gordon, *FBI Investigating Whether Russian Money Went to NRA to Help Trump*, McClatchy, Jan. 18, 2018, available at <http://www.mcclatchydc.com/news/nation-world/national/article195231139.html>

³ Add’l Inf. at 4.

⁴ Dianne Feinstein, Patrick Leahy, Dick Durbin, *et al.*, *Preliminary Findings About Trump Campaign’s Effort to Obtain Incriminating Information on Secretary Clinton from Russia at Trump Tower Meeting*, at 21 n.128, available at <https://www.feinstein.senate.gov/public/cache/files/b/3/b3e29bc4-8afd-4145-85d9-618dcad4a133/D069EF11DC3784A6D073B097E720572E.2018.05.15-transcript-release-findings-9-am.pdf>.

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illustrates the circular and hollow logic underlying these allegations. In other words, *Complainant is quoting Stone and Gordon essentially quoting themselves under the mantle of the minority members of the Senate Judiciary Committee.*

It is more than a little ironic that in a complaint involving allegations of money laundering, the only apparent “laundering” taking place is the bootstrapping of scurrilous speculation into what sounds like a damning finding of fact that might support a reason-to-believe finding. To be perfectly clear about how that laundering worked, here is the sequence of events:

(1) The January 18, 2018, Stone and Gordon article reported that the FBI was “investigating whether” Russian money was “funneled” to the NRA to help then-candidate Trump.⁵ The article provided no evidence at all that such funds existed or that such funneling occurred; it merely reported the existence of a supposed FBI investigation into whether there was any evidence for that claim. Indeed, as Stone and Gordon admitted in the same article, “[t]he extent to which the FBI has evidence of money flowing from Torshin to the NRA, or of the NRA’s participation in the transfer of funds, could not be learned.”⁶ This was nothing less than a tacit admission that Stone and Gordon knew of no evidence. If they’d had a single iota of evidence of NRA wrongdoing, or if one of their sources had even hinted that the FBI had such evidence, they certainly would have reported it. Rather than straightforwardly acknowledging the absence of evidence, they issued a disclaimer that, to the casual reader, would suggest that it was the “extent” of evidence of NRA wrongdoing, rather than its very existence, that was uncertain.

(2) When the Senate Judiciary Committee minority released their “preliminary findings” in May, 2018, they cited the January 18 Stone and Gordon article that reported the unsworn, anonymous, hearsay claim that an investigation was underway, and tacitly admitted the absence of any actual evidence of wrongdoing.⁷ Except that instead of merely reporting the assertion that an investigation was underway, the minority cited the article as the basis for a “finding” that “the Kremlin may...have used the NRA to secretly fund Mr. Trump’s campaign.”⁸

(3) Then, in a June 11, 2018, article, Stone and Gordon, who could not possibly have missed the underlying source of the minority’s claim, or its purely speculative nature—after all, they wrote it—reported without further explanation the far more forceful and serious-sounding “preliminary conclusion” of the committee minority.⁹ In doing so, Stone and Gordon engaged in a classic appeal to authority, attempting to imbue their earlier speculation with vicarious credibility via the committee minority. Naturally, the vast majority of readers, unaware of the history or source of that claim, would assume that the minority would never make such a serious allegation without at least some evidence tending to suggest NRA had been involved in illegal foreign contributions.

In three simple steps, *speculation* about the mere existence of evidence morphed into what most readers would take as a suggestion by an august body of the U.S. Senate that at least some

⁵ Stone & Gordon, *supra* note 2.

⁶ *Id.*

⁷ Feinstein, *et al.*, *supra* note 4.

⁸ *Id.*

⁹ Peter Stone & Greg Gordon, *Web of elite Russians met with NRA execs during 2016 campaign*, McClatchy, June 11, 2018, available at <https://www.mcclatchydc.com/latest-news/article212756749.html>

evidence actually exists. Complainant now cites that preliminary conclusion of the committee minority as evidence substantiating a reason-to-believe finding. But what began as scurrilous speculation is *still* scurrilous speculation, even if the minority members have now chosen to attach their names and reputations to it. (Complainant goes a step further by trying to attach to it the name and reputation of the entire committee.) The committee minority points to no more evidence for its conclusion that NRA “may” have been involved in unlawful foreign contributions than Stone and Gordon were able to point to in January, when they tacitly conceded that they had none. Stone and Gordon know that. The minority members of the Judiciary Committee must know it. And Complainant almost certainly knows it, too.¹⁰

Nothing could more clearly illustrate the utter dearth of evidence of wrongdoing by NRA than the fact that Stone, Gordon, and others felt the need to resort to such unscrupulous tactics.¹¹ The fact that they were willing to resort to such tactics says everything about their credibility on this matter.

2. The alleged “concerns” of Cleta Mitchell

Section A(i) of the Additional Information cites a March, 15, 2018, article—also by Stone and Gordon—for the unsworn, anonymous, hearsay claim that Cleta Mitchell, a former NRA board member who did legal work for the NRA in the past, “had concerns about [NRA’s] ties to Russia and its possible involvement in channeling Russian funds into the 2016 election.”¹² Prior to publication of that article, on March 14, 2018, Stone initiated an email exchange with Ms. Mitchell in which he made the following inquiry:

I also have heard from a source I trust that you have expressed concerns to some investigators or people familiar with the probes about the NRA's links to Russia and whether Russian funds could have flowed improperly through the NRA or allied conduits (such as LLCs or c4s) to influence the elections. Is this basically correct, or can you explain whether you have any concerns about the propriety of Torshin's dealings with the NRA, and if he or other Russians might have sent funds via the NRA or conduits that may be illegal?¹³

Ms. Mitchell replied,

¹⁰ Complainant cited the original Stone and Gordon article in the Complaint, Compl., *passim*, and cited both the June 11 Stone and Gordon article and the committee minority’s statement of preliminary findings in the Additional Information. Add’l Inf. at 3, n.5. It is rather implausible that he failed to notice the connections among the three.

¹¹ Sadly, the use of this type of tactic to bootstrap the credibility of an unsubstantiated claim is neither new nor uncommon. Stone’s and Gordon’s tactics are more than a little reminiscent of the way in which Glenn Simpson of Fusion GPS—whom Complainant also has cited, Compl. at 5—delivered his famous Trump dossier to the FBI, then cited the FBI’s interest in that dossier to establish its credibility. Kimberly A. Strassel, *Russia, the NRA and Fake News*, Wall St. J. Mar. 22, 2018, available at <https://www.wsj.com/articles/russia-the-nra-and-fake-news-1521761296>

¹² Add’l Inf. at 2-3 n.5.

¹³ Affidavit of Cleta Mitchell, attached hereto as Exhibit A (“Exh. A”), at 1.

No. I have no knowledge of anything like this and zero concerns whatsoever about anyone - Russians or otherwise — who “funneled” funds to / through NRA. Anyone who says otherwise is lying. NRA is meticulous about following all the rules. This is all a complete fabrication.¹⁴

McClatchy ran the story anyway, initially claiming that “congressional investigators have learned that [Ms. Mitchell] expressed concerns...” After Ms. Mitchell read the initial version of the story, she emailed Stone that,

[Y]ou COMPLETELY lied in th[e first] paragraph. You took some unnamed source, you put their false statement as the lead and you my truthful on the record statement down in the story as some sort of denial.

McClatchy subsequently revised its claim to, “congressional investigators are examining information that [Ms. Mitchell] expressed concerns...,” and moved her rejection of that claim to a point earlier in the story.¹⁵ McClatchy subsequently defended the accuracy of the story on the all-too-familiar ground that it didn’t matter whether Mitchell actually had or expressed the concerns referenced in the article, because Stone and Gordon were merely reporting *the existence of an investigation* into whether she had them.¹⁶ Once again, we find Stone and Gordon reporting anonymous, unsworn hearsay for the mere fact of a supposed investigation, which the Complainant then cites to the Commission as evidence for the truth of the claim supposedly being investigated. Ms. Mitchell continues to affirm that she never had or expressed the concerns referenced by Stone and Gordon in the article, and she now does so under oath in the attached affidavit.

Arguendo, even if it were true that Ms. Mitchell had “concerns” about the matters alleged in the Complaint, and even if the Judiciary Committee minority claimed to have facts to support its opinion that the NRA “may” have been involved in unlawful foreign contributions, neither Ms. Mitchell’s generalized concerns nor the unadorned opinion of the committee minority would constitute “specific facts” sufficient to support a reason-to-believe finding.

3. The Complainant’s allegations are based virtually exclusively on unsworn, anonymous hearsay

Stone’s and Gordon’s original assertion concerning the putative FBI investigation of the “funneling” of Russian money—the claim that lies at the very heart of the Complaint—and their more recent claim about Ms. Mitchell’s alleged concerns, are based upon hearsay (and potentially hearsay within hearsay) by unsworn, anonymous sources. Even if those reports contained specific facts probative of violations of FECA by NRA—they do not—and even if Stone and Gordon appeared to be exceptionally punctilious in every aspect of their reporting—clearly, they are not—it would be inappropriate for the Commission to rely on anonymous, unsworn hearsay in the popular media as the basis for a finding of reason to believe. Several Commissioners have reached the same conclusion in prior MURs.

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ Strassel, *supra* note 11.

In MUR 6002 (Freedom's Watch, Inc.), three Commissioners concluded that allegations based on anonymous sources in media reports are not "specific facts from reliable sources," and expressed reluctance to "make a reason-to-believe finding based solely on information culled from sources whose credibility and accuracy are difficult to ascertain."¹⁷ In MUR 6661 (Murray Energy Corporation), three Commissioners concluded that,

First, an anonymous, unsworn, hearsay statement (reprinted in a news article or not) presents legal and practical problems for the Commission and respondents. The Act requires complaints to be sworn subject to penalty of perjury, and the Commission may not take any action, let alone conduct an investigation, solely on the basis of an anonymous complaint. Thus, allegations based upon unsworn news reports, anonymous sources, and an author's summary conclusions and paraphrases provide questionable legal basis to substantiate a reason to believe finding. Further, the Commission may not be able to readily locate an anonymous source to verify the accuracy of the person's statements, the context of the purported statements, or assess credibility.¹⁸

In MUR 6518 (Gingrich), three Commissioners observed that,

unsworn news reports by authors who are not firsthand complainants or witnesses before the Commission present legal and practical problems for the Commission and respondents and, in any event, may be of limited probative value. The Act requires complaints be sworn subject to penalty of perjury. Because journalists often write quickly and their observations may be factually incorrect, complaints based upon an author's unsworn summary observations or paraphrases provide questionable legal and factual bases upon which to substantiate a reason to believe finding.¹⁹

All those concerns are certainly present in the Complaint and the Additional Information, which are based almost exclusively on unsworn hearsay, much of it from anonymous sources, in the popular media.

Hearsay concerns aside, Ms. Mitchell does not have and never had the concerns that Stone's and Gordon's article suggests she has. And the neither the Judiciary Committee minority nor Stone and Gordon have identified a single fact tending to suggest that the NRA was involved in a violation of FECA. The committee minority's cavalier opinion that NRA "may" have been involved in a violation rests upon nothing but Stone's and Gordon's claim that an investigation is underway. When one cuts through the nonsense and subterfuge, it becomes apparent that the most serious-sounding allegations of the Additional Information are neither credible, nor probative of any violation of FECA by NRA.

4. Alleged inconsistencies in NRA statements

¹⁷ MUR 6002 (Freedom's Watch, Inc.), Statement of Reasons of Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Donald F. McGahn at 6.

¹⁸ MUR 6661 (Murray Energy Corporation), Statement of Reasons of Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Lee E. Goodman at 7.

¹⁹ MUR 6518 (Gingrich), Statement of Reasons of Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Lee E. Goodman at 6-7.

With respect to allegations in the Additional Information that NRA has been inconsistent in its statements concerning donations or other transactions involving Russian nationals,²⁰ our letter to you dated April 13, 2018, largely addressed those concerns. However, an issue not addressed in that letter is a statement made to a reporter by NRA outside counsel Steve Hart, allegedly to the effect that NRA had received, "only a single contribution from a Russian individual of less than \$1,000" between 2012 and 2018."²¹ Mr. Hart avers that the reporter to which he spoke misquoted or misunderstood him. His statement was made on or about March 28, 2018, nine days after NRA filed its Initial Response, in which the NRA acknowledged receiving \$568.10 from Maria Butina in connection with a 2015 fund-raising auction. Since Mr. Hart reviewed and participated in the drafting of the Initial Response, we find it difficult to believe that he would have made a public statement contradicting its contents scarcely more than a week after its filing. That said, the contradictory claims about what was said perfectly illustrate why the Commission should not rely on hearsay in the news when making reason-to-believe determinations. The NRA has been consistent and forthcoming on this issue in its responses to the Commission, and has supported its statements with affidavits from officers and employees who are in position to know the facts. A single, disputed, media report of hearsay should not be given any weight in the face of real evidence.

5. The Complainant points to no facts probative of violations of FECA by NRA

All that said, we will not address the remainder of claims in the Additional Information point-by-point. There is no need, because they make no colorable case that the NRA violated FECA. The Additional Information recounts a flurry of details of purported interactions between the NRA and various Russians, and of questionable activity by Russians who purportedly interacted with NRA personnel: visits to and from Russia, names; meetings; attempts by Russians or their proxies to reach out to the Trump campaign while attending an NRA event; social media posts containing the braggadocious and prolific musings of a Russian politician. It goes on to suggest that Torshin is a money launderer and a gangster, who is subject to sanctions by the Office of Foreign Assets Control. (It is indisputably true that Torshin recently was sanctioned by OFAC.²²) But even if all those things are true, what is missing is any evidence of a *violation of FECA by the NRA*. Obviously, in light of subsequent developments involving Torshin and Maria Butina, it is regrettable in hindsight that they ever attended NRA events, or met NRA officers or directors. Nevertheless, those are not violations of FECA. Complainant appears to wish the Commission to adopt a rule that it is *per se* a violation of FECA—or at least *per se* the basis of a reason-to-believe finding—for politically active American people and entities to have ongoing relationships with foreign nationals.

²⁰ Add'l Inf. at 5-6, 8.

²¹ Add'l Inf. at 8, citing Trish Turner & Matthew Mosk, *NRA Says it Received One Contribution of Less than \$1000 from a Russian*, ABC News, Mar. 28, 2018, available at <https://abcnews.go.com/Politics/nra-received-contribution-1000-russian/story?id=54080082>

²² <https://home.treasury.gov/news/featured-stories/treasury-designates-russian-oligarchs-officials-and-entities-in-response-to> NRA has taken steps to comply with these sanctions vis-à-vis Torshin's NRA membership.

FECA is not so broad, and it would assume far too much to conclude that such relationships are probative of involvement in unlawful foreign influence in U.S. elections.²³

To quote our Initial Response, the Additional Information, like the Complaint, is, “devoid of any credible evidence that NRA knowingly solicited, accepted, or received any prohibited contribution or donation from a foreign national in connection with the 2016 elections; knowingly provided substantial assistance in the solicitation, making, acceptance, or receipt of a prohibited contribution from a foreign national in connection with the 2016 elections; or permitted any foreign national to direct, dictate, control, or directly or indirectly participate in its decisions in connection with its efforts to influence the 2016 elections.” Complainant *still* has not pointed to anything remotely probative of accusations that the NRA engaged in any of the foregoing conduct, and the affidavits provided with the Initial Response and with this Additional Response explicitly and conclusively refute Complainant’s accusations.

Conclusion

The Complaint and the Additional Information are nothing more or less than efforts to damn the NRA with guilt by association, in the hope that that alone will persuade the Commission to engage in a fishing expedition that will waste the NRA’s (and the Commission’s) energy, attention, and resources—if not forever, at least through this election cycle. We urge the Commission to see the Additional Information for what it is: a recitation of nugatory detail, unreliable hearsay and unsupported speculation that puts forth at least one fundamentally dishonest claim, and is intended to impress by volume and sinister tone, rather than by probative value. The Commission should give it no weight in the face of sworn statements—real, probative evidence—from people with access to the facts.

The NRA respectfully requests, again, that the Commission dismiss this MUR and close the file.

Respectfully,



Matthew H. Bower
Assistant General Counsel

²³ Between the filing of the Additional Information and this response, it has been reported that Maria Butina, one of the central characters discussed in the Complaint, has been arrested by the FBI based on an indictment for conspiracy to violate 18 U.S.C. § 951. U.S. Department of Justice, *Russian National Charged in Conspiracy to Act as an Agent of the Russian Federation Within the United States*, July 16, 2018, available at <https://www.justice.gov/opa/pr/russian-national-charged-conspiracy-act-agent-russian-federation-within-united-states>. No doubt Complainant will soon submit another “supplemental complaint” drawing the Commission’s attention to that arrest. Permit us to preempt that right now. Butina is not the NRA, and even if Butina did in fact conspire to violate 18 U.S.C. § 951, that would not be probative of any of Complainant’s allegations against the NRA.

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EXHIBIT A
AFFIDAVIT OF CLETA MITCHELL

AFFIDAVIT OF CLETA MITCHELL

PERSONALLY came and appeared before me, the undersigned Notary, the within named Cleta Mitchell, who is a resident of the State of North Carolina, and makes this statement and General Affidavit upon oath and affirmation of belief and personal knowledge that the following matters, facts and things set forth are true and correct to the best of her knowledge and belief:

(1) I, Cleta Mitchell, am an attorney and a former board member of the National Rifle Association of America (NRA), and have previously represented the NRA in various legal matters, including matters relating to campaign finance law and the First Amendment.

(2) On or about March 14, 2018, I was contacted by a journalist named Peter Stone, who said in an email to me that:

We're working on a follow up story to our earlier reporting re the FBI probe into Russian banker and life time NRA member Alexander Torshin and whether he may have funneled funds improperly through the NRA or an allied conduit to influence the elections and help Trump win. I've seen your name on a short list of people that the minority on House Intel wants to talk with "who might shed light on the NRA's relationship with Alexander Torshin." I also have heard from a source I trust that you have expressed concerns to some investigators or people familiar with the probes about the NRA's links to Russia and whether Russian funds could have flowed improperly through the NRA or allied conduits (such as LLCs or e4s) to influence the elections. Is this basically correct, or can you explain whether you have any concerns about the propriety of Torshin's dealings with the NRA, and if he or other Russians might have sent funds via the NRA or conduits that may be illegal?

(3) I responded in relevant part as follows:

No. I have no knowledge of anything like this and zero concerns whatsoever about anyone - Russians or otherwise — who "funneled" funds to / through NRA. Anyone who says otherwise is lying. NRA is meticulous about following all the rules. This is all a complete fabrication.

(4) Stone's article with his co-author, Greg Gordon, was published on March 15, 2018, on McClatchyDC.com, under the headline, "NRA lawyer expressed concerns about group's Russia ties, investigators told." The first sentence of the article claimed that,

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Congressional investigators have learned that a longtime attorney for the National Rifle Association expressed concerns about the group's ties to Russia and possible involvement in channeling Russian money into the 2016 elections to help Donald Trump, two sources familiar with the matter say.

(5) Upon reading the article, I responded immediately to Stone that:

[Y]ou COMPLETELY lied in th[e first] paragraph. You took some unnamed source, you put their false statement as the lead and you put my truthful on the record statement down in the story as some sort of denial.

(6) In response to my vigorous objections, McClatchy changed the headline of the article to, "Lawyer who worked for NRA said to have had concerns about group's Russia ties," and the first sentence became,

Congressional investigators are examining information that an ex-National Rifle Association board member who had done legal work for the group had concerns about its ties to Russia and its possible involvement in channeling Russian funds into the 2016 elections to help Donald Trump, two sources familiar with the matter say.

(7) The second iteration of the article merely changed the headline to a past tense and moved my denial of its central claim to an earlier point in the article but continued with the false statements regarding my 'concerns' about NRA.

(8) I continued to strenuously object that the article was false and then began directing my outrage about the false story to the co-author of the false story, Greg Gordon. I wrote to Gordon at 9:40 am EDT on March 16, 2018:

I do not know you. I told Peter Stone that this entire reference to Russia and the NRA is a lie and I have ZERO knowledge about it and ZERO concerns about it. I told him it was preposterous. Then you run a story saying the OPPOSITE? You better fix this story. This is an outright lie. Total fake news.

Who is your editor? I've NEVER said or even had a thought like this — I've always said the NRA is meticulous about its money and using correct dollars for its expenditures. And anyone who says anything to the contrary is lying. I told Peter Stone that.

Yet you run a story with unnamed sources saying otherwise and attribute some concerns to me? I can't believe this.

I want this corrected. Immediately. Take that headline and that paragraph out. I went on the record. Your "sources" did not.

Where are your journalistic scruples? Where? Where? This is outrageous beyond words.

Fix it. Now.

(9) I have absolutely never thought or expressed any concerns to any person about Russian funds having flowed improperly through the NRA or any "allied conduits" in connection with the 2016 elections.

(10) My association with the NRA as a board member and/or attorney ended years before 2016, and I have no first-hand knowledge whatsoever of any of NRA's activities in connection with the 2016 elections.

(11) I have never expressed concerns to anyone about the NRA's purported links to Russia or the possibility of the NRA having been involved in any unlawful foreign contributions. I consider those claims highly implausible, since my experience while I was associated with the NRA was that it was meticulous in observing any and all laws governing elections, campaign finance and related activities.

Further Affiant Sayeth Not.

DATED this the 23rd day of July, 2018

Cleta Mitchell

Signature of Affiant, Cleta Mitchell



and subscribed before me, this 23rd day of July, 2018, under penalty of perjury.

C. B. King
NOTARY PUBLIC

Commission Expires: 8/31/2021