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FEDERAL ELECTION COMMISSION

July 20, 2021 12:52 PM

**OFFICE OF GENERAL COUNSEL****FEDERAL ELECTION COMMISSION**

In the matter of:

National Rifle Association of America  
11250 Waples Mill Road  
Fairfax, VA 22030

National Rifle Association of America Political Victory Fund  
11250 Waples Mill Road  
Fairfax, VA 22030

National Rifle Association Institute for Legislative Action  
11250 Waples Mill Road  
Fairfax, VA 22030

NRA Victory Fund, Inc.  
11250 Waples Mill Road  
Fairfax, VA 22030

MUR No.: **7914**

Beretta USA Corporation  
17601 Beretta Drive  
Accokeek, MD 20607

Glock, Inc.  
6000 Highlands Parkway SE  
Smyrna, GA 30082

Sig Sauer  
72 Pease Blvd.  
Newington, NH 03801

Taurus Holdings, Inc.  
100 Taurus Way  
Bainbridge, GA 39817

**COMPLAINT**

1. Campaign for Accountability (“CfA”) and Michelle Kuppersmith bring this complaint before the Federal Election Commission (“FEC” or “Commission”) seeking an immediate investigation and enforcement action pursuant to 52 U.S.C. § 30109(a)(1) against the National Rifle Association of America (“NRA”), the National Rifle Association of America Political Victory Fund (“NRA-PVF”), the National Rifle Association Institute for Legislative Action (“NRA-ILA”), the NRA Victory Fund, Inc. (“NRA-VF”), Beretta USA Corporation (“Beretta”), Glock, Inc. (“Glock”), Sig Sauer, Inc. (“Sig Sauer”)

and Taurus Holdings, Inc. (“Taurus”) (collectively, “Respondents”) for violating the Federal Election Campaign Act of 1971, as amended (the “Act”) and Federal Election Commission (the “Commission”) regulations. Despite both public reporting and complaints filed with the Commission regarding Respondents’ activities in connection with the 2016 elections, the NRA and its affiliates continue to maintain financial connections to foreign entities. News reports indicate that the NRA has raised large sums from foreign sources, and it subsequently spent significant amounts of money in connection with the 2018 and 2020 elections. A Senate report has also deemed the NRA a “foreign asset” for its contacts and relationships with Russian agents in the leadup to the 2016 elections. The Commission should immediately investigate Respondents’ potential violations of 52 U.S.C. § 30121 and take appropriate remedial action against Respondents.

#### Complainants

2. Complainant CfA is a Section 501(c)(3) organization dedicated to ensuring accountability of public officials and compliance with federal laws. Toward this end, CfA seeks to protect and advance the right of citizens to be informed about the activities of government officials and to ensure the integrity of government officials and the government decision-making process by exposing unethical and illegal conduct of those involved in government. CfA uses research, litigation, and communications to advance its mission.

3. In furtherance of its mission, CfA also monitors campaign finance activities of those who finance federal elections and publicizes information regarding those who violate federal campaign finance laws. In order to assess whether an individual or entity is complying with federal campaign finance laws, CfA needs the information contained in disclosure reports political committees must file pursuant to FECA, 52 U.S.C. § 30104(a)&(b); 11 C.F.R. §§ 104.1, 104.3. CfA is hindered in its programmatic activity when an individual or entity fails to disclose campaign finance information in reports required by the FECA.

4. CfA relies on the FEC's proper administration of the FECA's reporting requirements because the FECA-mandated disclosure reports are the only source of information CfA can use to determine if an individual or entity is complying with the FECA. The proper administration of the FECA's reporting requirements includes mandating that all disclosure reports required by the FECA are properly and timely filed with the FEC. CfA is hindered in its programmatic activity when the FEC fails to properly administer the FECA's reporting requirements.

5. Complainant Michelle Koppersmith is Executive Director of Campaign for Accountability, a citizen of the United States, and a registered voter and resident of the State of New York. As a registered voter, Ms. Koppersmith is entitled to receive information contained in disclosure reports required by the FECA, 52 U.S.C. § 30104; 11 C.F.R. §§ 104.2, 104.3. Ms. Koppersmith is harmed when an individual, candidate, political committee, or other entity fails to report campaign finance activity as required by the FECA. *See FEC v. Akins*, 524 U.S. 11, 19 (1998), *quoting Buckley v. Valeo*, 424 U.S. 1, 66-67 (1976) (“[P]olitical committees must disclose contributors and disbursements to help voters understand who provides which candidates with financial support.”). Ms. Koppersmith is further harmed when the FEC fails to properly administer the FECA's reporting requirements, limiting her ability to review campaign finance information.

#### Respondents

6. The NRA is a 501(c)(4) organization that describes itself as the “premier firearms education organization in the world.”<sup>1</sup> The NRA is politically active and has a “lobbying arm,” the NRA-ILA,<sup>2</sup> and

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<sup>1</sup> National Rifle Association, About, <https://home.nra.org/about-the-nra/>.

<sup>2</sup> NRA-ILA, About the NRA Institute for Legislative Action, <https://www.nraila.org/about/>. The NRA-ILA is the lobbying arm of the 501(c)(4) organization.

two federally registered PACs: a separate segregated fund, the NRA-PVF,<sup>3</sup> and a Super PAC created in 2020, the NRA-VF.<sup>4</sup>

7. Beretta, Glock, Sig Sauer and Taurus are foreign gun manufacturers and corporate members of the NRA.<sup>5</sup>

## FACTUAL BACKGROUND

6. The NRA and its affiliates have spent significant sums in connection with federal elections over the past five years. In connection with federal elections in 2016, they spent \$54.4 million, about \$33.3 million of which was spent by the NRA-ILA on independent expenditures.<sup>6</sup> In connection with federal elections in 2018, they spent \$9 million, about \$8.2 million of which was spent by the NRA-PVF on independent expenditures.<sup>7</sup> In connection with federal elections in 2020, they spent \$28.6 million, about

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<sup>3</sup> Federal Election Commission, National Rifle Association of America Political Victory Fund, Amended Statement of Organization (filed Jan. 31, 2020),

<https://docquery.fec.gov/pdf/876/202004289232329876/202004289232329876.pdf>.

<sup>4</sup> Federal Election Commission, NRA Victory Fund, Inc., Statement of Organization (filed Mar. 10, 2020),

<https://docquery.fec.gov/pdf/433/202003109203798433/202003109203798433.pdf>.

<sup>5</sup> See “Top 10 NRA Industry Allies,” National Rifle Association, <https://nraindustryally.nra.org/top-10-allies/> (listing Taurus and Glock as #1 and #4 top industry allies, respectively, and listing both as members of the Golden Ring of Freedom); see also “Cash-strapped NRA discloses spending on foreign fundraising for first time,”

OpenSecrets.org (Dec. 16, 2019), <https://www.opensecrets.org/news/2019/12/nra-discloses-spending-on-foreign-fundraising/>;

“NRA Goes International in Its Mission to Defend Guns,” Bloomberg (Jan. 3, 2019),

<https://www.bloomberg.com/news/features/2019-01-03/nra-goes-global-with-its-pro-gun-agenda>

<sup>6</sup> See “National Rifle Association: Outside Spending Summary 2016,” OpenSecrets.org,

<https://www.opensecrets.org/outsidespending/detail.php?cycle=2016&cmte=C00053553>;

Federal Election Commission, National Rifle Association Institute for Legislative Action, Independent Expenditures 2015-2016,

[https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&committee\\_id=C90013301&is\\_notice=false&min\\_date=01%2F01%2F2015&max\\_date=12%2F31%2F2016](https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C90013301&is_notice=false&min_date=01%2F01%2F2015&max_date=12%2F31%2F2016).

<sup>7</sup> See Federal Election Commission, National Rifle Association of America Political Victory Fund, Independent Expenditures 2017-2018, [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&committee\\_id=C00053553&is\\_notice=false&min\\_date=01%2F01%2F2017&max\\_date=12%2F31%2F2018](https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00053553&is_notice=false&min_date=01%2F01%2F2017&max_date=12%2F31%2F2018);

Federal Election Commission, National Rifle Association Institute for Legislative Action, Independent Expenditures 2017-2018, [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&committee\\_id=C90013301&is\\_notice=false&min\\_date=01%2F01%2F2017&max\\_date=12%2F31%2F2018](https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C90013301&is_notice=false&min_date=01%2F01%2F2017&max_date=12%2F31%2F2018).

\$19.5 million of which was spent by NRA-VF.<sup>8</sup> In the 2019-2020 period, the NRA-VF received about \$10.3 million from the NRA-PVF and \$5.2 million from the NRA-ILA.<sup>9</sup> Most of NRA-VF's independent expenditures in this period were made in opposition to the candidacy of Joseph R. Biden against incumbent President Donald Trump.<sup>10</sup>

7. Respondents have been the subject of two recent complaints to the Commission. The first was filed on January 28, 2018, by the American Democracy Legal Fund and Brad Woodhouse ("ADLF Complaint").<sup>11</sup> The complaint alleged that Alexander Torshin, the Russian deputy central banker with ties to Russian President Vladimir Putin, funneled money to the NRA for use in the 2016 presidential campaign of Donald Trump. It further alleged that Russian infiltration of the NRA allowed access to election-related decision-making and constituted an illegal foreign national campaign contribution. The complaint requested a Commission investigation to parallel two existing investigations by the Federal Bureau of Investigation and the U.S. House of Representatives. Locked in a 2-2 vote impasse, however, the Commission was unable to act and ultimately voted 4-0 to close the file.<sup>12</sup>

8. The second complaint against Respondents was filed on August 14, 2019, by Allen Epstein ("Epstein Complaint").<sup>13</sup> The complaint alleged that Donald Trump and the 2016 Trump presidential

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<sup>8</sup> Federal Election Commission, National Rifle Association of America Political Victory Fund, Independent Expenditures 2019-2020, [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&committee\\_id=C00053553&is\\_notice=false&min\\_date=01%2F01%2F2019&max\\_date=12%2F31%2F2020](https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00053553&is_notice=false&min_date=01%2F01%2F2019&max_date=12%2F31%2F2020); Federal Election Commission, NRA Victory Fund, Inc., Independent Expenditures 2019-2020, [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&committee\\_id=C00741710&is\\_notice=false&min\\_date=01%2F01%2F2019&max\\_date=12%2F31%2F2020](https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00741710&is_notice=false&min_date=01%2F01%2F2019&max_date=12%2F31%2F2020).

<sup>9</sup> Federal Election Commission, NRA Victory Fund, Inc., Individual Contributions 2019-2020, [https://www.fec.gov/data/individual-contributions/?committee\\_id=C00741710&two\\_year\\_transaction\\_period=2020](https://www.fec.gov/data/individual-contributions/?committee_id=C00741710&two_year_transaction_period=2020).

<sup>10</sup> Federal Election Commission, NRA Victory Fund, Inc., Independent Expenditures 2019-2020, [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&committee\\_id=C00741710&is\\_notice=false&min\\_date=01%2F01%2F2019&max\\_date=12%2F31%2F2020](https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00741710&is_notice=false&min_date=01%2F01%2F2019&max_date=12%2F31%2F2020).

<sup>11</sup> Federal Election Commission, Matter Under Review #7314, <https://www.fec.gov/data/legal/matter-under-review/7314/>.

<sup>12</sup> *Id.*

<sup>13</sup> Federal Election Commission, Matter Under Review #7637, <https://www.fec.gov/data/legal/matter-under-review/7637/>.

campaign knowingly used foreign national contributions via the NRA, in violation of the Act. Locked in a 3-3 vote impasse, however, the Commission was again unable to act and voted 6-0 to close the file.<sup>14</sup>

9. Since the ADLF and Epstein Complaints, significant additional public findings have been made. In September 2019, the minority staff of the U.S. Senate Committee on Finance published a report (the “Senate Report”) outlining the depth of the relationship between the NRA and Russia, referring to the NRA as having become a “foreign asset.”<sup>15</sup> For example, the Senate Report highlights that the NRA *financed* the 2015 trip to Moscow that was described in the ADLF Complaint as a “luxurious trip to Russia for NRA leaders [hosted by Torshin and Maria Butina],”<sup>16</sup> where NRA leaders sought business opportunities.<sup>17</sup> The Senate Report further found that NRA leaders maintained years-long relationships with Torshin and Butina and *facilitated* access for them to Republican and Trump campaign officials, including Donald Trump Jr., and to a broader conservative political network.<sup>18</sup>

10. Then, in December 2019, the NRA disclosed on its 2018 Form 990 “spending on foreign fundraising for the first time in [its] history.”<sup>19</sup> The total amount of foreign funds raised by these efforts is not known because the NRA does not disclose its donors. However, donors contributing \$1 million or more are entered into the NRA’s “Golden Ring of Freedom.”<sup>20</sup> And, NRA records and media reports show that gunmakers Beretta (an Italian company), Glock (an Austrian company), Sig Sauer (a German

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<sup>14</sup> *Id.*

<sup>15</sup> “The NRA and Russia: How a Tax-Exempt Organization Became a Foreign Asset,” U.S. Senate Committee on Finance Minority Staff Report (Sept. 2019), <https://apps.npr.org/documents/document.html?id=6432520-The-NRA-Russia-How-a-Tax-Exempt-Organization> [hereinafter, “Senate Report”].

<sup>16</sup> Federal Election Commission, Matter Under Review #7314, Complaint (filed Jan. 28, 2018), <https://www.fec.gov/files/legal/murs/7314/19044473509.pdf>.

<sup>17</sup> “NRA Was ‘Foreign Asset’ To Russia Ahead of 2016, New Senate Report Reveals,” NPR (Sept. 27, 2019), <https://www.npr.org/2019/09/27/764879242/nra-was-foreign-asset-to-russia-ahead-of-2016-new-senate-report-reveals>.

<sup>18</sup> Senate Report, at 59-75.

<sup>19</sup> “Cash-strapped NRA discloses spending on foreign fundraising for first time,” OpenSecrets.org (Dec. 16, 2019), <https://www.opensecrets.org/news/2019/12/nra-discloses-spending-on-foreign-fundraising/>.

<sup>20</sup> “Membership Levels,” National Rifle Association, <https://www.nraringoffreedom.com/membership/membership-levels/>.

company), and Taurus (a Brazilian company) are all members.<sup>21</sup> While each gunmaker operates a U.S. subsidiary, it is unclear whether the contributions resulting in each gunmaker's donor status were entirely funded by those subsidiaries. Notably, however, it was reported that former president and CEO of family-run Beretta,<sup>22</sup> Ugo Gussalli Beretta,<sup>23</sup> "pledged \$1 million to the NRA on behalf of the company in 2008, a gift that entitled him to membership in the Golden Ring of Freedom."<sup>24</sup> Again, during 2019 and 2020, following its publicly-disclosed foreign fundraising push, the NRA transferred \$15.5 million to the NRA-VF and engaged in other electoral spending efforts, raising important questions about its compliance with the Act's foreign-national prohibitions.<sup>25</sup>

11. These questions are especially acute with regard to the NRA-VF's spending in connection with the 2020 Senate runoff election in Georgia. Two of the foreign gun manufacturers – Sig Sauer and Taurus – agreed to contribute up to \$1,000,000 to the NRA-ILA to match contributions made to the organization between September 1, 2020 and November 15, 2020.<sup>26</sup> Less than a week after the matching

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<sup>21</sup> See "Top 10 NRA Industry Allies," National Rifle Association, <https://nraindustryally.nra.org/top-10-allies/> (listing Taurus and Glock as #1 and #4 top industry allies, respectively, and listing both as members of the Golden Ring of Freedom); see also "Cash-strapped NRA discloses spending on foreign fundraising for first time," OpenSecrets.org (Dec. 16, 2019), <https://www.opensecrets.org/news/2019/12/nra-discloses-spending-on-foreign-fundraising/>; "NRA Goes International in Its Mission to Defend Guns," Bloomberg (Jan. 3, 2019), <https://www.bloomberg.com/news/features/2019-01-03/nra-goes-global-with-its-pro-gun-agenda>.

<sup>22</sup> "Franco Gussalli Beretta defends the family-run gunmaking company," Financial Times (June 9, 2016), <https://www.ft.com/content/5d9ed1c4-2bf5-11e6-bf8d-26294ad519fc>.

<sup>23</sup> Ugo Gussalli Beretta is apparently an Italian national. See "La Vita Beretta: At Home in Italy with the First Family of Firearms," Forbes (Sept. 28, 2014), <https://www.forbes.com/sites/forbeslifestyle/2014/09/10/inside-the-beretta-empire-a-fashion-line-hunting-lodges-and-an-italian-villa/?sh=2374d3b3014b>; "Ugo Gussalli BERETTA," The Henokiens, [https://www.henokiens.com/content.php?id=21&id\\_portrait=19&lg=en](https://www.henokiens.com/content.php?id=21&id_portrait=19&lg=en) (last accessed July 15, 2021); "How to Build a Dynasty," Family Business (Summer 1993), <https://www.familybusinessmagazine.com/how-build-dynasty>.

<sup>24</sup> "NRA Goes International in Its Mission to Defend Guns," Bloomberg (Jan. 3, 2019), <https://www.bloomberg.com/news/features/2019-01-03/nra-goes-global-with-its-pro-gun-agenda>.

<sup>25</sup> Federal Election Commission, NRA Victory Fund, Inc., Individual Contributions 2019-2020, [https://www.fec.gov/data/individual-contributions/?committee\\_id=C00741710&two\\_year\\_transaction\\_period=2020](https://www.fec.gov/data/individual-contributions/?committee_id=C00741710&two_year_transaction_period=2020); Federal Election Commission, NRA Victory Fund, Inc., Independent Expenditures 2019-2020, [https://www.fec.gov/data/independent-expenditures/?data\\_type=processed&committee\\_id=C00741710&is\\_notice=false&min\\_date=01%2F01%2F2019&max\\_date=12%2F31%2F2020](https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00741710&is_notice=false&min_date=01%2F01%2F2019&max_date=12%2F31%2F2020).

<sup>26</sup> National Rifle Association Institute for Legislative Action, *NRA-ILA Announces Partnership with 6 Companies for \$1 Million Match Campaign* (Sept. 1, 2020) <https://www.nra-ila.org/articles/20200901/nra-ila-announces-partnership-with-6-companies-for-1-million-match-campaign>



contribution period ended, the NRA-ILA transferred \$110,000 to the NRA-VF.<sup>27</sup> Three weeks later, the NRA-ILA transferred an additional \$992,205 to the NRA-VF.<sup>28</sup> Less than a week after that final tranche of funds was transferred, the NRA-VF spent \$1,195,917 on television advertisements opposing the election of Jonathan Ossoff and Raphael Warnock in the Georgia Senate runoff election.<sup>29</sup>

## LEGAL STANDARDS

12. The Act and Commission regulations prohibit foreign national involvement in any U.S. election. A foreign national is defined as either a foreign principal, including a business entity that is organized under the laws of a foreign country or has its principal place of business in a foreign country, or an “individual who is not a citizen of the United States and who is not lawfully admitted for permanent residence.”<sup>30</sup> Specifically, the Act prohibits foreign nationals from making, directly or indirectly, contributions and donations in connection with an election.<sup>31</sup> It also prohibits foreign nationals from making, directly or indirectly, any expenditures, independent expenditures, or disbursements,<sup>32</sup> and states that it is unlawful for a person to knowingly solicit, accept, or receive a contribution from a foreign national.<sup>33</sup>

13. Commission regulations further prohibit participation by foreign nationals in decisions involving election-related activities: “A foreign national shall not direct, dictate, control, or directly or indirectly participate in the decision-making process of any person, such as a corporation, labor organization, political committee, or political organization with regard to such person’s . . . election-related activities,

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<sup>27</sup> NRA Victory Fund, Inc., FEC Form 3X, 2020 Year-End Report (Jan. 29, 2021) <https://docquery.fec.gov/cgi-bin/forms/C00741710/1494621/sa/17>

<sup>28</sup> *Id.*

<sup>29</sup> NRA Victory Fund, Inc., FEC 24/48 Hour Report of Independent Expenditures (Schedule E)(Dec. 22, 2020) <https://docquery.fec.gov/cgi-bin/forms/C00741710/1483810/se>

<sup>30</sup> 52 U.S.C. § 30121(b), *cross-referencing* 22 U.S.C. § 611(b); 11 C.F.R. § 110.20(a)(3).

<sup>31</sup> 52 U.S.C. § 30121(a)(1)(A); 11 C.F.R. § 110.20(b).

<sup>32</sup> 52 U.S.C. § 30121(a)(1)(C); 11 C.F.R. § 110.20(e)-(f).

<sup>33</sup> 52 U.S.C. § 30121(a)(2); 11 C.F.R. § 110.20(g).



such as decisions concerning the making of contributions, donations, expenditures, or disbursements in connection with elections for any [public] office or decisions concerning the administration of a political committee.”<sup>34</sup>

14. Additionally, Commission regulations prohibit knowingly providing “substantial assistance in the solicitation, making, acceptance, or receipt of a contribution or donation” from a foreign national and knowingly providing “substantial assistance in the making of an expenditure, independent expenditure, or disbursement” by a foreign national.<sup>35</sup> This prohibition extends to “persons who act as conduits or intermediaries for foreign national contributions or donations.”<sup>36</sup>

### LEGAL ANALYSIS

15. While Respondents escaped all penalties for their unlawful activities in support of Donald Trump during the 2016 elections, the scrutiny did not prevent them from continuing to accept and spend foreign money. Rather than exercising caution, the NRA seems to have doubled down on its foreign ties by mounting fundraising campaigns in foreign countries and accepting millions of dollars from foreign corporations, which qualify as foreign nationals. It then seems that the NRA, using NRA-ILA, transferred huge sums to NRA-VF to run independent expenditures in the 2020 elections. The Commission should immediately investigate these actions for possible violations of the Act.

16. Specifically, it appears the Respondents may have committed several violations of the Act and Commission regulations. First, it appears that the NRA may have knowingly solicited foreign nationals for contributions, as it conducted fundraising of foreign funds in 2018. It subsequently transferred money to the NRA-VF for use for independent expenditures in 2020. While the amount of money raised by these

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<sup>34</sup> 11 C.F.R. § 110.20(i).

<sup>35</sup> *Id.* § 110.20(h).

<sup>36</sup> *Explanations and Justification, Assisting Foreign National Contributions or Donations*, 67 Fed. Reg. 69,945-46 (Nov. 19, 2002).

efforts is not publicly available, the mere solicitation of foreign national donations, knowing that the funds will be used on electoral activities, is unlawful.

17. Second, the Respondents may have further violated the Act by accepting contributions from foreign nationals, as they have apparently accepted six-figure contributions from foreign business entities for decades, including from family-run Italian gunmaker, Beretta, whose president and CEO (apparently an Italian national) pledged at least \$1 million in 2008. And the NRA-VF subsequently received transfers from the NRA and spent significant sums on electoral activities. Such activity is unlawful.

18. Third, it appears as though the Respondents provided substantial assistance to foreign nationals in making independent expenditures. If the NRA received foreign national contributions for the purpose of independent expenditures in connection with the 2020 elections, its actions would have violated the Act and Commission regulations.

19. Lastly, if during an investigation, the Commission determines the identity of any foreign national who contributed funds for election purposes, those foreign nationals should be added as Respondents. And, if any of these large foreign national donors exercised any control over the NRA's decision-making in connection with the 2018 or 2020 elections, including over the administration of the NRA-PVF and its millions of dollars of election spending in 2018, such control would be unlawful. Given the revelations in the Senate Report and its determination that the NRA was a "foreign asset," such a violation appears possible.

20. Desperate to remain relevant and solvent in the face of severe legal and financial pressure,<sup>37</sup> the NRA and its affiliates appear to have continued, if not deepened, financial ties to foreign entities with

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<sup>37</sup> See "NRA bankruptcy follows years of declining political spending," OpenSecrets.org (Jan. 27, 2021), <https://www.opensecrets.org/news/2021/01/nra-bankruptcy-follows-years-of-decline/>; "Judge Dismisses NRA Bankruptcy Case, Heightening Risk For Dissolution Of Group," NPR (May 11, 2021),

interest in U.S. elections. As a 501(c)(4), the NRA is not required to reveal the identity of its donors. However, after being labeled a “foreign asset,” evidence suggests that the NRA funneled significant foreign national contributions through its affiliated entity towards expenditures in connection with the 2020 elections. The solicitation, acceptance, and use of foreign money for electoral activity would be a stark violation of the Act and Commission regulations, and an affront to the integrity of our democracy. Having escaped scrutiny for illegal activities related to the 2016 elections, the NRA should not be allowed to get away with such unashamed transgressions in connection with the 2018 and 2020 elections.

### **REQUESTED ACTION**

21. Public records and media reports indicate that Respondents may have violated the Act and Commission regulations by soliciting and accepting contributions by foreign nationals, and by providing substantial assistance to facilitate foreign independent expenditures in connection with elections in 2020. This also raises questions about foreign influence over the NRA’s activities, including the administration of NRA-PVF, which spent heavily in the 2018 elections. As such, Campaign for Accountability and Michelle Kuppersmith respectfully request that the Commission immediately investigate these potential violations and any wrongdoing by the NRA’s largely undisclosed foreign donors that it discovers during the investigation. We further request that Respondents be enjoined from further violations and be fined the maximum amount permitted by law for violations in connection with the 2018 and 2020 elections.

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ON BEHALF OF COMPLAINANTS

Michelle Kuppersmith  
 Executive Director  
 Campaign for Accountability  
 611 Pennsylvania Avenue, S.E.  
 #337  
 Washington, D.C. 20003  
 (202) 780-5750

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<https://www.npr.org/2021/05/11/995934682/judge-dismisses-nra-bankruptcy-case-heightening-risk-for-dissolution-of-group>.

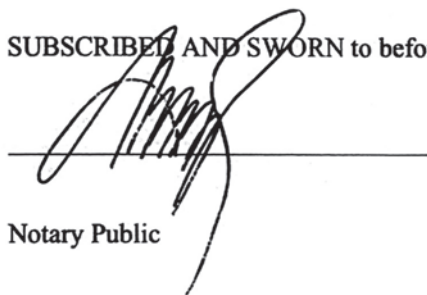
**Verification**

Campaign for Accountability and Michelle Koppersmith hereby verify that the statements made in the attached Complaint are, upon information and belief, true.

Sworn to pursuant to 18 U.S.C. § 1001.

  
Michelle Koppersmith

SUBSCRIBED AND SWORN to before me this 19 day of July, 2021.

  
\_\_\_\_\_  
Notary Public

**NATHALY TORRE**  
**Notary Public - State of New York**  
**No. 01TO6388041**  
**Qualified in Bronx County**  
**My Commission Expires Feb. 25, 2023**

My Commission Expires:  
2/25/2023