

From: [Jeff Reh](#)
To: [CELA](#)
Subject: MUR 7914
Date: Wednesday, August 04, 2021 10:13:29 AM

To Mr. Roy Q. Lockett
Acting Assistant General Counsel
Complaints Examination & Legal Administration

And to Ms. Kathryn Ross
Paralegal

Dear Mr. Lockett and Ms. Ross:

This email is provided as the response of Beretta U.S.A. Corp. per your letter of July 27, 2021 to Mr. Steven Biondi, Registered Agent for that company. Please note that Mr. Biondi received that referenced letter on July 30, 2021.

This response is based on information personally and professionally known by the undersigned to be true and is provided under oath. Please also note that this response is limited to allegations contained in the Complaint filed with your agency by the Campaign for Accountability and Ms. Michelle KupperSmith with regard to Beretta U.S.A. Corp. (hereinafter referred to as "The Complaint"). No part of this response, unless otherwise noted, is applicable to other entities mentioned in that Complaint.

As a preliminary matter, it should be noted that almost every statement made in The Complaint with respect to Beretta U.S.A. is incorrect, starting with the spelling of its name, which is Beretta U.S.A. Corp. (not Beretta USA Corporation). In addition, Beretta U.S.A. Corp. is not a foreign corporation. It is a Maryland corporation formed and incorporated in that State in the 1970s.

To the extent that The Complaint pertains to donations made to the National Rifle Association (NRA) by Beretta U.S.A. Corp. in 2008, it is not timely filed with your agency. Of equal importance is the fact that no donation has been made by Beretta U.S.A. Corp. to the NRA for the purpose of redirecting said donation into any funding of any federal election campaign. No communication, either directly or by implication, has been made by the NRA to Beretta USA or, to the knowledge of the undersigned, to any Beretta family member or Beretta corporate officer or executive, or by any such Beretta person to the NRA, seeking to support funding for the campaign of candidates for any federal elected position. Donations made by Beretta U.S.A. to the NRA were in support of the pro-2nd Amendment activities of that organization and not for the purpose of providing any funds to any Political Action Committee (PAC) owned or operated by the NRA.

In addition, Beretta U.S.A. Corp. is not a "corporate member of the NRA", as alleged in numbered paragraph 7 of The Complaint. Beretta U.S.A. Corp. has been a donor to the NRA, as noted above, but the "members" of the NRA are individuals who are registered members of that organization and who are therefore authorized to vote on matters pertaining to the NRA. To the knowledge of the undersigned, no corporation is a "member of the NRA" as that term should be defined.

Finally, it is a bit ridiculous The Complaint to imply that a donation made by Beretta U.S.A. Corp. in 2008 was intended for the purpose of electing Donald J. Trump President of the United States 8 years later, especially considering the fact that Mr. Trump had not declared himself a candidate for political office of any type at that time, nor could it reasonably be considered likely at that time that he would later do so or that the NRA would start stockpiling funds in 2008 for such an eventuality.

If your agency has any further questions or needs further information pertaining to Beretta U.S.A. Corp., please feel free to direct them to the attention of the undersigned. If not and in any event, Beretta U.S.A. Corp. respectfully requests that your Agency find no probable cause of any campaign finance violation with respect to Beretta U.S.A. as alleged in The Complaint.

Sincerely,
BERETTA U.S.A. CORP.
Jeffrey K. Reh
General Counsel