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August 17, 2021

VIA E-MAIL (cela@fec.gov)

Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Kathryn Ross, Paralegal
1050 First Street, NE
Washington, D.C. 20463

**Re: In the Matter of National Rifle Association of America, et al.
MUR No.: 7914**

Dear Ms. Ross:

We represent Glock, Inc. with respect to the above-captioned matter that was filed with the Federal Election Commission. We are writing in response and opposition to the Complaint and respectfully request that no action should be taken against Glock, Inc.

The subject Complaint, filed by Michelle KupperSmith of the Campaign for Accountability, alleges violations of the Federal Election Campaign Act of 1971 (52 U.S.C. § 30101 *et seq.*) by Glock, Inc. and the other named Respondents. Specifically, it alleges that foreign entities may have made donations to the political fundraising arms of the National Rifle Association of America (“NRA”) in violation of 52 U.S.C. § 30121.

As set forth in the enclosed affidavit of Vice President and General Counsel Carlos Guevara, Glock, Inc. is a U.S. Corporation located in Smyrna, Georgia. It is not a foreign entity. From 2015 through 2020, Glock, Inc. has made annual donations to the NRA’s General Fund, the Whittington Outdoor Center, and the Whittington Center’s Adventure Camp. These NRA programs are not named in the Complaint and are not one of the NRA PACs that contribute to political campaigns. Glock, Inc.’s donations to the NRA are independently funded and it does not receive any contributions or other funds from Glock Ges.m.b.H for the purpose of making donations to the NRA. Moreover, Mr. Guevara confirmed that Glock Ges.m.b.H does not make donations to the NRA.

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Based upon the foregoing, we submit that Glock, Inc. has not violated the Federal Election Campaign Act of 1971 or the Federal Election Commission Regulations and request that no action should be taken against it with respect to this Complaint. Thank you for your consideration and please do not hesitate to contact us should you require anything further.

Very truly yours,

RENZULLI LAW FIRM, LLP



Christopher Renzulli

Enclosures

cc: Carlos Guevara, Vice President and General Counsel

CONFIDENTIAL AFFIDAVIT OF CARLOS GUEVARA

State of Georgia)
) ss:
 County of Cobb)

I, Carlos Guevara, being duly sworn, attests as follows:

1. I am over eighteen years of age, and I am qualified to make the following affidavit in support of GLOCK, Inc.’s Response to the Federal Election Commission Complaint (MUR No.: 7914) that was filed by the Center for Accountability. I have personal knowledge of the information contained herein and it is true and correct to the best of my knowledge and belief.

2. I am a Director, Vice President, General Counsel, and Records Custodian of GLOCK, Inc., which is incorporated under the laws of the State of Georgia and has a primary place of business located at 6000 Highlands Parkway SE, Smyrna, Georgia 30082.

3. Glock Ges.m.b.H, is a limited liability company that is organized under the laws of Austria and has a primary place of business in Deutsch-Wagram, Austria.

4. As Director, Vice President, General Counsel, and Records Custodian I am familiar with GLOCK, Inc.’s history of donations to the National Rifle Association of America (“NRA”).

5. From 2015 through 2020, GLOCK, Inc. has made annual, earmarked donations to the NRA as follows:

- a. The NRA General Fund: \$50,000 per year;
- b. The Whittington Outdoor Center: \$50,000 per year to support the Center’s operations;
- c. The Whittington Center Adventure Camp: \$15,000 per year to support the Summer Youth Program that is held each year at the Center.

6. A confidential accounting report documenting GLOCK, Inc.’s annual donations to the aforementioned NRA programs is attached to this affidavit as “**Exhibit A.**”

7. These annual transactions document the full extent of GLOCK, Inc.'s donations to all NRA entities and/or programs. GLOCK, Inc. has no record of donations to the NRA Political Victory Fund, the NRA Institute for Legislative Action, the NRA Victory Fund, or any other NRA political fund.

8. GLOCK, Inc.'s donations to the NRA are independently funded by GLOCK, Inc. It does not receive funds from Glock Ges.m.b.H for the purpose of making donations to NRA programs.

9. I have conferred with the executive officers at Glock Ges.m.b.H, including its Chief Financial Officer, and confirmed that Glock Ges.m.b.H has not made any donations to any NRA entities and/or programs during the time period specified in the Complaint.

10. As such, GLOCK, Inc. and Glock Ges.m.b.H have not made political donations to the NRA Political Victory Fund, the NRA Institute for Legislative Action, or the NRA Victory Fund at any point during the time period specified in the Complaint.

11. It is respectfully requested that no action should be taken against Glock, Inc.

FURTHERMORE, AFFIANT SAYETH NOT.



Carlos Guevara

SWORN TO AND SUBSCRIBED before me this 17th day of August, 2021, by Carlos Guevara who is personally known to me.



Notary Public, State of Georgia

My commission expires: 5/28/25

(Seal)

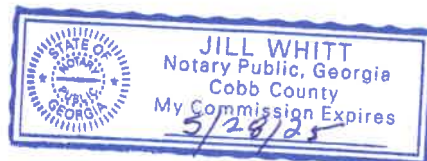


EXHIBIT A

NRA

Voucher	Invoice	Date	Document date	Amount
VINV-003219	Donation 2015	3/1/2015	3/1/2015	-50,000.00
VINV-013239	05/05/2016	5/10/2016	5/5/2016	-50,000.00
VINV-021119	032717-NRA	3/28/2017	3/27/2017	-50,000.00
VINV-029669	042618 NRA	4/26/2018	4/26/2018	-50,000.00
VINV-036438	030119-NRA	3/4/2019	3/1/2019	-50,000.00
VINV-045142	040120-NRA	4/1/2020	4/1/2020	-50,000.00
				-300,000.00

NRA Whittington Center Operations

Voucher	Invoice	Date	Status	Document date	Amount
VINV-003220	Donation 2015	3/1/2015	Invoiced	3/1/2015	-50,000.00
VINV-013240	05/05/2016	5/10/2016	Invoiced	5/5/2016	-50,000.00
VINV-021118	032717-NRAWC	3/28/2017	Invoiced	3/27/2017	-50,000.00
VINV-029670	042618 NRA Whittingt	4/26/2018	Invoiced	4/26/2018	-50,000.00
VINV-036440	030119-NRAWC	3/4/2019	Invoiced	3/1/2019	-50,000.00
VINV-045143	040120-NRA Center	4/1/2020	Invoiced	4/1/2020	-50,000.00
					-300,000.00

NRA Whittington Center Adventure Camp

Voucher	Invoice	Date	Status	Document date	Amount
VINV-003221	Donation 2015 -Camp	3/1/2015	Invoiced	3/1/2015	-15,000.00
VINV-013238	05/05/2016	5/10/2016	Invoiced	5/5/2016	-15,000.00
VINV-021120	032717-NRAWCAC	3/28/2017	Invoiced	3/27/2017	-15,000.00
VINV-029672	042618 NRA WCAC	4/26/2018	Invoiced	4/26/2018	-15,000.00
VINV-036441	030119-NRAWCAC	3/4/2019	Invoiced	3/1/2019	-15,000.00
VINV-045144	040120-NRA Camp	4/1/2020	Invoiced	4/1/2020	-15,000.00
					-90,000.00



FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7914

Name of Counsel: Christopher Renzulli

Firm: Renzulli Law Firm, LLP

Address: One North Broadway, Suite 1005

White Plains, New York 10601

Office#: 914-285-0700 Fax#: 914-285-1213

Mobile#: _____

E-mail: crenzulli@renzullilaw.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

08/17/2021
Date


(Signature - Respondent/Agent/Treasurer)

Vice President
Title

Carlos Guevara
(Name - Please Print)

RESPONDENT: Glock, Inc.
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 6000 Highlands Parkway SE
(Please Print)

Smyrna, Georgia 30082

Home#: _____ Mobile#: _____

Office#: 770-319-4778 Fax#: _____

E-mail: Carlos.Guevara@glock.us

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.