



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

December 8, 2006

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

Response Due Date:
January 9, 2007

Identification Number: C00053553

Reference: Amended September Monthly Report (08/01/06-08/31/06), received
10/20/06

Dear Ms. Adkins:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule E of your report indicates that your committee may have failed to file one or more of the required 48 hour notices for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The notice must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. 11 CFR §104.3(b)

-Your committee filed a 48 hour notice(s) informing the Commission of independent expenditures made in support or opposition of federal

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candidates with "Edmonds Associates" and "NRA Political Victory Fund" as the payee(s). However, the vendors, dates of public dissemination, and election designations disclosed on the notice(s) do not appear to correlate with the entries disclosed on Schedule E, supporting Line 24 for the reporting period. If your committee has filed a 48 hour notice(s) for independent expenditures that are not reflected on your report(s), you must file Schedule E during the appropriate reporting period(s) to disclose the payments. Please amend your report to clarify this discrepancy and provide clarifying information.

-Please clarify the disbursement(s) made for "Member Bumpersticker" on Schedule B supporting Line 29. If this disbursement(s) constitutes a communication to your restricted class which is exempt from the definition of contribution and expenditure under 11 CFR §114.3, it should be disclosed on Line 29 of the Detailed Summary Page. Furthermore, the purpose of each disbursement should include the type of expense, the name, office sought, state, and district, if applicable; of each federal candidate identified in the communication, and a statement that the expense is for an internal communication to the restricted class (see Advisory Opinion 2000-3). Please amend your report to properly disclose this activity or provide clarifying information.

-Please clarify all expenditures made for "Fundraising Consulting Fee" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B or E supporting Lines 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Schedule B discloses an expenditure(s) for "Independent Expenditure-Newspaper Ad," "Independent Expenditure-Newspaper Ad P," "Independent Expenditure-Outdoor Ad Pro," "Independent Expenditure-Outdoor Advert," and "Independent Expenditure-Postcards." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) and voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this

activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1139.

Sincerely,



Karen E. Trainer
Senior Campaign Finance Analyst
Reports Analysis Division

Name of Payee	Date	Amount	Purpose	Candidate
Edmonds Associates, Inc.	08/24/06	\$19,892.98	Independent Expenditure - Newspaper Ad	Burns, Conrad
Edmonds Associates, Inc.	08/24/06	\$10,149.00	Independent Expenditure - Newspaper Ad P	Burns, Conrad
Edmonds Associates, Inc.	08/24/06	\$5,173.91	Independent Expenditure - Newspaper Ad	Cubin, Barbara
Edmonds Associates, Inc.	08/24/06	\$5,027.00	Independent Expenditure - Newspaper Ad P	Cubin, Barbara
Edmonds Associates, Inc.	08/24/06	\$6,165.98	Independent Expenditure - Newspaper Ad	Gerlach, Jim
Edmonds Associates, Inc.	08/24/06	\$7,289.50	Independent Expenditure - Newspaper Ad P	Gerlach, Jim
Edmonds Associates, Inc.	08/24/06	\$8,605.41	Independent Expenditure - Newspaper Ad	Kennedy, Mark
Edmonds Associates, Inc.	08/24/06	\$7,246.50	Independent Expenditure - Newspaper Ad P	Kennedy, Mark
Edmonds Associates, Inc.	08/24/06	\$18,553.50	Independent Expenditure - Newspaper Ad	Kyl, Jon
Edmonds Associates, Inc.	08/24/06	\$12,889.00	Independent Expenditure - Newspaper Ad P	Kyl, Jon
Edmonds Associates, Inc.	08/24/06	\$11,200.00	Independent Expenditure - Newspaper Ad	McSweeney, David
Edmonds Associates, Inc.	08/24/06	\$13,923.00	Independent Expenditure - Newspaper Ad P	McSweeney, David
Edmonds Associates, Inc.	08/24/06	\$4,178.25	Independent Expenditure - Newspaper Ad	O'Donnell, Richard
Edmonds Associates, Inc.	08/24/06	\$6,080.50	Independent Expenditure - Newspaper Ad P	O'Donnell, Richard
Edmonds Associates, Inc.	08/24/06	\$56,567.29	Independent Expenditure - Newspaper Ad	Santorum, Rick
Edmonds Associates, Inc.	08/24/06	\$37,743.00	Independent Expenditure - Newspaper Ad P	Santorum, Rick
Edmonds Associates, Inc.	08/24/06	\$6,165.98	Independent Expenditure - Newspaper Ad	Santorum, Rick
Edmonds Associates, Inc.	08/24/06	\$7,289.50	Independent Expenditure - Newspaper Ad P	Santorum, Rick
Edmonds Associates, Inc.	08/24/06	\$10,514.41	Independent Expenditure - Newspaper Ad	Talent, James
Edmonds Associates, Inc.	08/24/06	\$7,293.00	Independent Expenditure - Newspaper Ad P	Talent, James
Edmonds Associates, Inc.	08/24/06	\$6,375.00	Independent Expenditure - Newspaper Ad	Wilson, Heather
Edmonds Associates, Inc.	08/24/06	\$8,121.00	Independent Expenditure - Newspaper Ad P	Wilson, Heather

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