



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Mary Rose Adkins, Treasurer
NRA Political Victory Fund
11250 Waples Mill Road
Fairfax, VA 22030

FEB 10 1999

Identification Number: C00053553

Reference: 12 Day Pre-General Report (10/1/98-10/14/98)

Dear Mrs. Adkins:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule E discloses independent expenditures made for "travel advance" and "airline tickets" (pertinent portions attached). Please be advised that an independent expenditure is an expenditure for a communication (such as a newspaper, TV or direct mail advertisement) that expressly advocates the election or defeat of a clearly identified candidate and is not made in coordination, consultation, cooperation, or at the request or suggestion of a candidate, agent of a candidate or candidate's committee. 11 C.F.R. § 109.1(a). Please clarify the nature of this disbursement.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division

SCHEDULE E

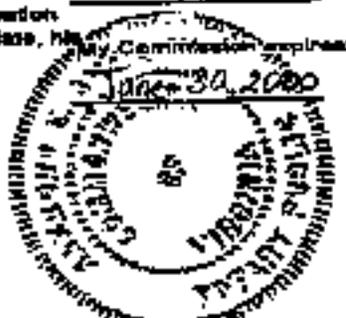
ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Name of Committee (In Full)			I.D. No.	
NRA Political Victory Fund			C0053553	
Full Name, Mailing Address, ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
PAUL PAYNE 11250 MAPLES MILL ROAD FAIRFAX, VA 22030	travel advance	10/13/98	2,500.00	Jim Bunning KY - 04 <input type="checkbox"/> Support <input type="checkbox"/> Oppose
NRA INSTITUTE FOR LEGISLATIVE ACTION 11250 MAPLES MILL ROAD FAIRFAX, VA 22030	airline tickets	10/13/98	580.00	Jim Bunning KY - 04 <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
PAUL PAYNE 11250 MAPLES MILL ROAD FAIRFAX, VA 22030	travel advance	10/13/98	2,500.00	L. Faircloth NC - Senate <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
NRA INSTITUTE FOR LEGISLATIVE ACTION 11250 MAPLES MILL ROAD FAIRFAX, VA 22030	airline tickets	10/13/98	580.00	L. Faircloth NC - Senate <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			\$ 6,160.00	
(b) SUBTOTAL of Unitemized Independent Expenditures			\$	
(c) TOTAL Independent Expenditures			\$	6,160.00

Under Penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or his agent.

Paul Payne 10-22-98
Signature Date



[Signature]
NOTARY PUBLIC

