NRA
Political Victory Fund
Institute for Legislative Action
11250 Waples Mill Road, Fairfax, Virginia 22030

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COMMISSION MAIL ROOM

JUN 11 11 14 AM '97

June 4, 1997

Federal Election Commission
Reports Analysis Division
Attn.: Monica Johnson
999 E Street, NW
Washington, D.C. 20463

Id. C00053553.
RE: Independent Expenditures

Dear Ms. Johnson:

Your letters dated April 23, 1997, raised questions concerning our independent expenditures in support of Andrea Seastrand, Jim Ryun, Asa Hutchinson and Bob Barr. These expenditures qualify as "independent expenditures" as defined in 11 CFR §109.1(a). Further definition under 11 CFR §109.1(b)(4) was used to test the independence of the expenditures reported in the NRA Political Victory Fund's 12 Day Pre-General and 30 Day Post-General Reports.

After investigating our activity in relation to these candidates, we have determined that the expenditures in question qualify as "independent expenditures" and do not fall under the guidelines set forth in CFR §109.1(c). If you have any questions, please call me at (703) 267-1152.

Sincerely,

Ray Smith
PVF Assistant Treasurer

Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

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ges — PREPARER

6-11-97 — DATE PREPARED

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