FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

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

APR 23 1997

Identification Number: C00053553

Reference: 30 Day Post-General Report (10/17/96-11/25/96)

Dear Ms. Jennison:

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 on behalf of federal candidates (pertinent portion(s) attached). Schedule B of a previous report disclosed in-kind contributions on behalf of some of these same candidates. Under 2 U.S.C. §431(17), an "independent expenditure" is defined as:

> ... an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate.

The coordination involved in making an in-kind contribution to a candidate may preclude your committee from making an independent expenditure in support of the same candidate. Under 11 CFR §109.1(c), any expenditure which does not qualify as an independent expenditure is considered an in-kind contribution. Please amend your reports to disclose the aforementioned transactions as in-kind contributions (Schedule B supporting Line 23 of the Detailed Summary Page), or provide additional clarifying information concerning the independent expenditures made in support of Jim Ryun, Andrea Seastrand, Asa Hutchinson and Bob Barr.

If the reclassification of these expenditures as in-kind contributions results in excessive contributions, the Commission recommends that you notify the recipient(s) and request a refund of the amount in excess of $5,000 per election. Please inform the Commission immediately in writing and provide a photo- copy of your refund request(s) sent to the recipient(s). In addition, any refund should be disclosed on Schedule A supporting Line 16 of your next report.

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) 219-3580.

Sincerely,

Monica Johnson

Monica Johnson
Reports Analyst
Reports Analysis Division

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SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Name of Committee (in Full): NRA Political Victory Fund

I.D. No.: C00053563

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
Optima Direct 8100 Boone Blvd Vienna, VA 22182	phone bank	11/13/96	3,650.13	Brownback, S. KS - Senate [X] Support [ ] Oppose
Radio America 1030 15th Street, NW Washington, DC 20005	radio ads	10/24/96	1,800.00	Roberts, Pat KS - Senate [X] Support [ ] Oppose
Optima Direct 8100 Boone Blvd Vienna, VA 22182	phone bank	11/13/96	3,650.13	Roberts, Pat KS - Senate [X] Support [ ] Oppose
Prolist Professional Data Service 17904 Georgia Ave Olney, MD 20832	postage and labor for endorsement mailing	11/21/96	1,614.64	Ryun, Jim KS - 2 [X] Support [ ] Opp
Optima Direct 8100 Boone Blvd Vienna, VA 22182	phone bank	11/13/96	1,044.54	Ryun, Jim KS - 2 [X] Support [ ] Oppose
National Rifle Assoc 11250 Waples Mill Rd Fairfax, VA 22030	list rental	11/21/96	436.86	Ryun, Jim KS - 2 [X] Support [ ] Op

(a) SUBTOTAL of Itemized Independent Expenditures . . . . . $ 13,196.30

(b) SUBTOTAL of Unitemized Independent Expenditures . . . . . $

(c) TOTAL Independent Expenditures . . . . . $

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 their agent.

Signature: [signature] Date: 12-4-96

Subscribed and sworn to before me this 4th day of December, 19 96

My Commission expires: 6/30/2000

NOTARY PUBLIC

ITEMIZED DISBURSEMENTS

Line 23
NRA Political Victory Fund

Any information copied from such Reports & Statements may not be sold or used by any person for the purpose of soliciting or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committiees.

Name & Address	Purpose of Disbursement	Date	Amount
HAMILTON for CONGRESS COMMITTE P.O. BOX 99 JEFFERSONVILLE, IN 47130	LEE HAMILTON 1996 GENERAL ELECTION CONTRIBUTION F/IN - 009	09/23/96	2,450.00
McINTOSH for CONGRESS P.O. BOX 2424 MUNCIE, IN 47307	DAVID McINTOSH 1996 GENERAL ELECTION CONTRIBUTION F/IN - 002	09/23/96	2,000.00
CITIZENS for JOE ZAKAS 16372 WILD CHERRY DRIVE GRANGER, IN 46530	JOE ZAKAS 1996 GENERAL ELECTION CONTRIBUTION F/IN - 003	09/23/96	2,500.00
PAT ROBERTS for U.S. SENATE 1189 SW WANAMAKER #B TOPEKA, KS 67801	PAT ROBERTS 1996 GENERAL ELECTION CONTRIBUTION F/KS - S	09/23/96	2,950.00
NATINAL RIFLE ASSOCIATION 11250 WAPLES MILL ROAD FAIRFAX, VA 22030	JIM RYUN 1996 GENERAL IN-KIND CONTRIBUTION F/KS - 002	09/30/96	100.00
OCCASIONS CATERERS 910 PENNSYLVANIA AVE., SE WASHINGTON, DC 20003	JIM RYUN 1996 GENERAL IN-KIND CONTRIBUTION F/KS - 002	09/30/96	238.15
RON LEWIS for CONGRESS P.O. BOX 307 ELIZABETHTOWN, KY 42702	RON LEWIS 1996 GENERAL ELECTION CONTRIBUTION F/KY - 002	09/23/96	4,950.00
McCONNELL for SENATE COMMITTEE 513 1/2 WEST 3rd STREET LOUISVILLE, KY 40202	MITCH McCONNELL 1996 GENERAL ELECTION CONTRIBUTION F/KY - S	09/23/96	4,950.00
JENKINS for SENATE 1996 660 NORTH FOSTER DRIVE #C-201 BATON ROUGE, LA 70806	WOODY JENKINS 1996 PRIMARY ELECTION CONTRIBUTION F/LA - S	09/17/96	4,950.00
EHRLICH for CONGRESS 1527 YORK ROAD LUTHERVILLE, MD 21093	ROBERT EHRLICH 1996 GENERAL ELECTION CONTRIBUTION F/MD - 002	09/10/96	3,000.00

Sub TOTAL Disbursements this period.....155,838.15

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SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Name of Committee (In Full): NRA Political Victory Fund

I.D. No.: C00053553

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
Edmonds Associates, Inc 900 Second Street, NE Washington, DC 20005	billboard production cost	11/15/96	6,632.75	Hayworth, J.D. AZ - 6 [X] Support [ ] Oppose
National Rifle Assoc 11250 Waples Mill Rd Fairfax, VA 22030	list rental	11/21/96	1,304.94	Hayworth, J.D. AZ - 6 [X] Support [ ] Oppose
Edmonds Associates, Inc 900 Second Street, NE Washington, DC 20002	radio ads	10/22/96	57,115.00	LaFever, Tim CA - 3 [X] Support [ ] Oppose
Edmonds Associates, Inc 900 Second Street, NE Washington, DC 20002	radio ads	10/22/96	19,541.76	Riggs, Frank CA - 1 [X] Support [ ] Oppose
Radio America 1030 15th Street, NW Washington, DC 20005	radio ads	10/24/96	540.00	Seastrand, A. CA - 22 [X] Support [ ] Oppose
Prolist 17904 Georgia Ave Olney, MD 20832	postage labor endorsement mailing	11/21/96	13,923.38	Allard, Wayne CO - Senate [X] Support [ ] Oppose

(a) SUBTOTAL of Itemized Independent Expenditures . . . . . $ 99,017.87

(b) SUBTOTAL of Unitemized Independent Expenditures . . . . . $

(c) TOTAL Independent Expenditures . . . . . $

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 their agent.

[signature] 12-4-96

Signature Date

Subscribed and sworn to before me this 4th day of December, 19 96

My Commission expires 6/30/2000

[signature]

NOTARY PUBLIC

ITEMIZED DISBURSEMENTS

Line 23
NRA Political Victory Fund

Any information copied from such Reports & Statements may not be sold or used by any person for the purpose of soliciting or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committees.

Name & Address	Purpose of Disbursement	Date	Amount
MAJORITY LEADER'S FUND 19 WILKES STREET ALEXANDRIA, VA 22314	MAJORITY LEADER'S 1996 COMMITTEE CONTRIBUTION F/ -	08/08/96	2,500.00
TERRY EVERETT for CONGRESS COM P.O. BOX 1460 ENTERPRISE, AL 36331	TERRY EVERETT 1996 GENERAL ELECTION CONTRIBUTION F/AL - 002	08/14/96	2,500.00
CUMMINS for CONGRESS P.O. BOX 1719 LITTLE ROCK, AR 72203	BUD CUMMINS 1996 GENERAL ELECTION CONTRIBUTION F/AR - 002	08/14/96	2,500.00
DUPWE for CONGRESS P.O. BOX 9364 JONESBORO, AR 72403	WARREN DUPWE 1996 GENERAL ELECTION CONTRIBUTION F/AR - 001	08/14/96	2,500.00
ASA HUTCHINSON for CONGRESS P.O. BOX 2222 FORT SMITH, AR 72902	ASA HUTCHINSON 1996 GENERAL ELECTION CONTRIBUTION F/AR - 003	08/14/96	3,000.00
PINNACLE PEAK STEAK HOUSE 2533 So. LA CADENA COLTON, CA 92324	LINDA WILDE 1996 GENERAL IN-KIND CONTRIBUTION F/CA - 042	08/20/96	1,498.00
GOLETA HOLIDAY INN - BANQUETS 5650 CALLE REAL GOLETA, CA 93117	ANDREA SEASTRAND 1996 GENERAL IN-KIND CONTRIBUTION F/CA - 022	08/26/96	722.15
CHARLES CANADY for CONGRESS P.O. BOX 6158 LACKLAND, FL 33807	CHARLES CANADY 1996 PRIMARY ELECTION CONTRIBUTION F/FL - 012	08/29/96	1,000.00
FRIENDS of MARK FOLEY 1951 BUILTMORE ST., NW #3 WASHINGTON, DC 20009	MARK FOLEY 1996 PRIMARY ELECTION CONTRIBUTION F/FL - 016	08/29/96	3,450.00
BAKER for CONGRESS 120 EAST MAIN GALESBURG, IL 61402	MARK BAKER 1996 GENERAL ELECTION CONTRIBUTION F/IL - 017	08/14/96	1,500.00

Sub TOTAL Disbursements this period..... 21,170.15

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SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Name of Committee (in Full): NRA Political Victory Fund

I.D. No.: C00053553

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
Federal Express Corp P.O. Box 1140 Memphis, TN 38101	mailing of endorsement fliers	11/15/96	8.00	Sessions, Jeff AL - Senate [X] Support [ ] Oppose
National Rifle Assoc 11250 Waples Mill Rd Fairfax, VA 22030	list rental	11/21/96	1,462.33	Sessions, Jeff AL - Senate [X] Support [ ] Oppose
Radio America 1030 15th Street, NW Washington, DC 20005	radio ads	10/24/96	1,500.00	Dupree, Warren AR - 1 [X] Support [ ] Oppose
Edmonds Associates, Inc 900 Second Street NE Washington, DC 20002	billboard production cost	11/15/96	2,475.62	Hutchinson, A. AR - 3 [X] Support [ ] Oppose
Radio America 1030 15th Street, NW Washington, DC 20005	radio ads	10/24/96	500.00	Hayworth, J.D. AZ - 6 [X] Support [ ] Oppose
Prolist 17904 Georgia Ave Olney, MD 20832	postage labor endorsement mailing	11/15/96	6,610.42	Hayworth, J.D. AZ - 6 [X] Support [ ] Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			$ 12,936.37	
(b) SUBTOTAL of Unitemized Independent Expenditures			$	
(c) TOTAL Independent Expenditures			$	

Under Penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, consent 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 their agent.

Signature: [signature] Date: 12-4-96

Subscribed and sworn to before me this 4th day of December, 19 96

My Commission expires 11/30/2000

Notary Public

95031573350

SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Name of Committee (In Full): NRA Political Victory Fund

I.D. No.: C00053553

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
Prolist 17904 Georgia Ave Olney, MD 20832	postage labor endorsement mailing	11/21/96	1,432.32	Schefer, Dan CO - 6 [X] Support [ ] Oppose
National Rifle Assoc 11250 Waples Mill Rd Fairfax, VA 22030	list rental	11/21/96	242.94	Schefer, Dan CO - 6 [X] Support [ ] Oppose
Prolist 17904 Georgia Ave Olney, MD 20832	postage labor endorsement mailing	11/21/96	2,463.42	Schaffer, Bob CO - 4 [X] Support [ ] Oppose
Optima Direct 8100 Boone Blvd Vienna, VA 22182	phone bank	11/13/96	1,372.94	Schaffer, Bob CO - 4 [X] Support [ ] Oppose
National Rifle Assoc 11250 Waples Mill Rd Fairfax, VA 22030	list rental	11/21/96	410.16	Schaffer, Bob CO - 4 [X] Support [ ] Oppose
Prolist 17904 Georgia Ave Olney, MD 20832	postage labor endorsement mailing	11/15/96	1,811.06	Barr, Bob GA - 7 [X] Support [ ] Oppose

(a) SUBTOTAL of Itemized Independent Expenditures . . . . . $ 6,932.86

(b) SUBTOTAL of Unitemized Independent Expenditures . . . . . $

(c) TOTAL Independent Expenditures . . . . . $

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 their agent.

Signature: [signature] Date: 12-4-96

Subscribed and sworn to before me this 4th day of December, 19 96

My Commission expires 6/10/2000

NOTARY PUBLIC

ITEMIZED DISBURSEMENTS

Line 23
NRA Political Victory Fund

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Name & Address	Purpose of Disbursement	Date	Amount
MSSA POLITICAL COMMITTEE P.O. BOX 4924 MISSOULA, MT 59806	MT MSSA POLITICAL CM 1996 COMMITTEE CONTRIBUTION F/ -	10/29/96	2,500.00
ROBERT ADERHOLT for CONGRESS P.O. BOX 1158 HALEYVILLE, AL 35565	ROBERT ADERHOLT 1996 GENERAL ELECTION CONTRIBUTION F/AL - 004	10/24/96	4,950.00
PRESTIGE ADVERTISING SPECIALTI 17941 DUMFRIES CIRCLE OLNEY, MD 20832	ASA HUTCHINSON 1996 GENERAL IN-KIND CONTRIBUTION F/AR - 003	10/25/96	1,495.25
HUTCHINSON for CONGRESS 602 GARRISON AVE., SUITE 650 FORT SMITH, AR 72901	ASA HUTCHINSON 1996 GENERAL ELECTION CONTRIBUTION F/AR - 003	11/01/96	454.75
HAYWORTH for CONGRESS 4451 BROOKFIELD CORP DR #200 CHANTILLY, VA 22021	J.D. HAYWORTH 1996 GENERAL ELECTION CONTRIBUTION F/AZ - 006	10/25/96	2,950.00
CONRAD for CONGRESS 1101 STANDIFORD AVE MODESTO, CA 95350	BILL CONRAD 1996 GENERAL ELECTION CONTRIBUTION F/CA - 018	10/30/96	2,500.00
FRIENDS of MARK FOLEY 1951 BUILTMORE ST, NW #3 WASHINGTON, DC 20009	MARK FOLEY 1996 GENERAL ELECTION CONTRIBUTION F/FL - 016	10/24/96	2,000.00
BARR for CONGRESS COMMITTEE P.O. BOX 4323 MARIETTA, GA 30061	BOB BARR 1996 GENERAL ELECTION CONTRIBUTION F/GA - 007	10/23/96	2,500.00
EDMONDS ASSOCIATES, INC 900 SECOND STREET, NE WASHINGTON, DC 20002	BOB BARR 1996 GENERAL ELECTION IN-KIND F/GA - 007	10/23/96	10.00
ORSON SWINDLE for CONGRESS 733 BISHOP STREET, #170-119 HONOLULU, HI 96813	ORSON SWINDLE 1996 GENERAL ELECTION CONTRIBUTION F/HI - 001	11/01/96	4,950.00

Sub TOTAL Disbursements this period..... 24,310.00