RQ-2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 23 1997

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

Identification Number: C00053553

Reference: 12 Day Pre-General Report (10/1/96-10/16/96)

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 Andrea Seastrand.

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

96031110655

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 20002	billboard advertising	10/04/96	52,400.00	J.D. Hayworth AZ - 6 ☒ Support ☐ Oppose
Edmonds Associates, Inc 900 Second Street, NE Washington, DC 20002	radio ad	10/14/96	69,305.00	J.D. Hayworth AZ - 6 ☒ Support ☐ Oppose
Federal Express P.O. Box 1140 Memphis, TN 38101	mailing of endorsement fliers	10/16/96	5.00	Larry Ardito CA - 32 ☐ Support ☐ Oppose
Federal Express P.O. Box 1140 Memphis, TN 38101	mailing of endorsement fliers	10/16/96	5.00	John Flores CA - 31 ☒ Support ☐ Oppose
Federal Express P.O. Box 1140 Memphis, TN 38101	mailing of endorsement fliers	10/16/96	5.00	John Leonard CA - 33 ☐ Support ☐ Oppose
Edmonds Associates, Inc 900 Second Street, NE Washington, DC 20002	radio ad	10/16/96	32,059.00	A. Seastrand CA - 22 ☒ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures . . . . . $ 154,179.00
(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] 10-21-96
Signature Date

Subscribed and sworn to before me this 21st day of October, 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