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Gun Owners of America, Inc.  
8001 Forbes Place, Suite 102  
Springfield, VA 22151-2205

March 28, 2013

Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Attn: Ms. Jill Sugarman  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

Re: Gun Owners of America, Inc.  
FEC Identification Number: C90011693

Dear Ms. Sugarman:

This responds to your letter dated February 22, 2013 from the Reports Analysis Division of the Federal Election Commission ("FEC") to Gun Owners of America, Inc. ("GOA"). Your letter requests additional information regarding the 24-hour notices which were filed for three independent expenditures ("IEs") in 2012.

All three independent expenditures were with respect to a July 31, 2012 Texas runoff election.

- (1) An IE of \$3,947.10 was made for robo calls by Voice Broadcasting (1527 S. Cooper Street, Arlington, TX 76010). The robo calls were initiated on July 26, 2012. A 24-hour notice regarding this IE should have been filed with the FEC by 11:59 p.m. on July 27, 2012. The required 24-hour notice regarding this IE was filed with the FEC on August 20, 2012, which was the same day that the undersigned found out about the IE.
- (2) An IE of \$9,337.80 was made for robo calls by Voice Broadcasting (1527 S. Cooper Street, Arlington, TX 76010). The robo calls were initiated on July 27, 2012. A 24-hour notice regarding this IE should have been filed with the FEC by 11:59 p.m. on July 28, 2012. The required 24-hour notice regarding this IE was filed with the FEC on August 20, 2012, which was the same day that the undersigned found out about the IE.
- (3) An IE of \$6,955.00 was made for radio ads by CDR Communications, Inc. (9310-B Old Keene Mill Road, Burke, VA 22015). The radio ads were initiated on July 27, 2012. A 24-hour notice regarding this IE should have been filed with the FEC by 11:59 p.m. on July 28, 2012. The required 24-hour notice regarding this IE was filed with the FEC on August 22, 2012, which was the same day that the undersigned found out about the IE. The 24-hour notice was filed as an amendment to the prior 24-hour notice that was filed on August 20, 2012.

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The undersigned, who prepared and filed the required 24-hour notices described above, is well aware of the FEC requirements for filing 24-hour notices and other reports with the FEC. However, regarding the three IEs described above, the persons who arranged for the three IEs to be made violated GOA's established practices and neglected to inform the undersigned that the IEs were being made, preventing the required 24-hour notices from being timely filed with the FEC.

All three expenditures occurred over a 24-hour period, and were essentially the same mistake repeated. Upon discovery, the required 24-hour notices were filed immediately and additional procedures were taken to prevent a future recurrence of the problem.

All three IEs described above were reported in the October 15 Quarterly FEC Form 5 report (7/1/12 through 9/30/12), which was timely filed on October 15, 2012 with the FEC.

If any additional information is required, please contact me.

Sincerely yours,

Walter J. Olson

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