



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 29, 2009

Mary Rose Adkins, Treasurer
National Rifle Association of America Political
Victory Fund
11250 Waples Mill Road
Fairfax, VA 22030

Response Due Date:
June 1, 2009

Identification Number: C00053553

Reference: Amended October Monthly Report (9/01/08 – 9/30/08), received 1/30/09

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 items:

1. Schedule E of your report indicates that your committee may have failed to file one or more of the required 48 hour notices for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The notice must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. 11 CFR §104.3(b)
2. Schedule B discloses an expenditure(s) for "Prepay Media." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would

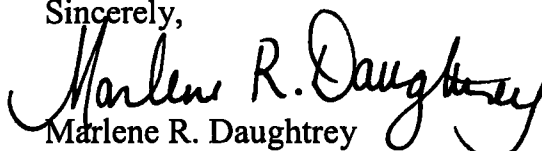
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constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1394.

Sincerely,



Marlene R. Daughtrey
Senior Campaign Finance Analyst
Reports Analysis Division

NATIONAL RIFLE ASSOCIATION OF AMERICA POLITICAL VICTORY FUND

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Name of Payee	Date	Amount	Purpose	Candidate
Novacon Promotional Products	9/25/08	\$321.62	Bumper Stickers	Andal, Dean
Edmonds Associates, Inc.	9/16/08	\$13,212.00	Billboard Advertising	Coleman, Norm Sen.
Edmonds Associates, Inc.	9/16/08	\$1,394.71	Billboard Production Cost	Coleman, Norm Sen.
Novacon Promotional Products	9/25/08	\$643.26	Bumper Stickers	Coleman, Norm Sen.
Edmonds Associates, Inc.	9/26/08	\$49,000.00	Radio Ads	Coleman, Norm Sen.
Novacon Promotional Products	9/25/08	\$321.62	Bumper Stickers	Dole, Elizabeth
Edmonds Associates, Inc.	9/25/08	\$23,165.00	TV Advertising	Dole, Elizabeth
Edmonds Associates, Inc.	9/16/08	\$4,905.00	Billboard Advertising	Feeney, Tom Rep.
Edmonds Associates, Inc.	9/16/08	\$3,295.29	Billboard Production Cost	Feeney, Tom Rep.
Edmonds Associates, Inc.	9/26/08	\$49,000.00	Radio Ads	Franken, Al
Edmonds Associates, Inc.	9/25/08	\$23,165.00	TV Advertising	Hagan, Kay
Edmonds Associates, Inc.	9/16/08	\$7,882.00	Billboard Advertising	Hay, Sydney
Edmonds Associates, Inc.	9/16/08	\$2,148.23	Billboard Production Cost	Hay, Sydney
Edmonds Associates, Inc.	9/16/08	\$5,588.00	Billboard Advertising	Hayes, Robin C. Rep.
Edmonds Associates, Inc.	9/16/08	\$3,024.70	Billboard Production Cost	Hayes, Robin C. Rep.
Novacon Promotional Products	9/25/08	\$321.62	Bumper Stickers	Hayes, Robin C. Rep.
Edmonds Associates, Inc.	9/16/08	\$4,706.00	Billboard Advertising	Knollenberg, Joe Rep.
Edmonds Associates, Inc.	9/16/08	\$1,395.29	Billboard Production Cost	Knollenberg, Joe Rep.
Edmonds Associates, Inc.	9/16/08	\$6,471.00	Billboard Advertising	Kuhl, John

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NATIONAL RIFLE ASSOCIATION OF AMERICA POLITICAL VICTORY FUND

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Edmonds Associates, Inc.	9/16/08	\$664.70	Billboard Production Cost	Kuhl, John
Novacon Promotional Products	9/25/08	\$321.62	Bumper Stickers	Kuhl, John
Edmonds Associates, Inc.	9/4/08	\$11,962.50	Newspaper Ads	Obama, Barack
Edmonds Associates, Inc.	9/4/08	\$11,962.50	Newspaper Ads	Obama, Barack
Meridian Resources, LLC	9/8/08	\$2,000.00	Consulting Fees	Obama, Barack
Edmonds Associates, Inc.	9/9/08	\$29,071.00	Newspaper Ads	Obama, Barack
Edmonds Associates, Inc.	9/9/08	\$35,204.00	Newspaper Ads	Obama, Barack
Edmonds Associates, Inc.	9/16/08	\$151,945.00	Magazine Ads	Obama, Barack
Edmonds Associates, Inc.	9/16/08	\$8,680.00	Independent Expenditure - Magazine Ad Pr	Obama, Barack
Edmonds Associates, Inc.	9/16/08	\$7,370.53	Billboard Advertising	Obama, Barack
Edmonds Associates, Inc.	9/16/08	\$13,212.00	Billboard Advertising	Obama, Barack
Edmonds Associates, Inc.	9/16/08	\$8,117.50	Billboard Advertising	Obama, Barack
Edmonds Associates, Inc.	9/16/08	\$799.37	Billboard Production Cost - Estimated Co	Obama, Barack
Edmonds Associates, Inc.	9/16/08	\$1,394.70	Billboard Production Cost	Obama, Barack
Edmonds Associates, Inc.	9/16/08	\$332.35	Billboard Production Cost	Obama, Barack
Edmonds Associates, Inc.	9/18/08	\$572,159.75	TV Advertising	Obama, Barack
Edmonds Associates, Inc.	9/18/28	\$146,781.60	Radio Ads	Obama, Barack
Edmonds Associates, Inc.	9/25/08	\$580,845.00	TV Advertising	Obama, Barack
Edmonds Associates, Inc.	9/16/08	\$7,276.00	Billboard Advertising	Stivers, Steve
Edmonds Associates, Inc.	9/16/08	\$4,603.53	Billboard Production Cost	Stivers, Steve
Edmonds Associates, Inc.	9/16/08	\$8,423.47	Billboard Advertising	Walberg, Timothy
Edmonds Associates, Inc.	9/16/08	\$913.57	Billboard Production Cost	Walberg, Timothy

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