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March 24, 2013

Federal Election Commission
Reports Analysis Division
Attn: Paul Stoetzer
999 E Street, NW
Washington, DC 20463

ID# C00053553
RE: Amended 12 Day Pre-General Report (10/01/2014 - 10/15/2014)

Dear Mr. Stoetzer:

This letter is in response to item 1 of your letter dated March 1, 2015 regarding the NRA Political Victory Funds Amended 12 Day Pre-General Report (10/01/2014 - 10/15/2014) concerning receipts for Line 11(a) that increased from the original report.

When preparing in-house financial statements for the month of October, reconciliations showed that some contributions were not posted to our system by our lockbox service company. The contributions in question should have been posted with a date of October 15th but were not deposited into our account until October 17th and 20th. These deposits in transit were not discovered until a full analysis and reconciliation of our activity for the month of October was performed.

Once the error was found, corrective action was taken and we attempted to amend the report. Unfortunately, our reporting program had incorrect totals in Column B for the October Monthly and the Pre-General reports. Instead of amending the report knowing that there were problems, we waited until our software provider determined the cause of the error. On January 21, 2015, Vocus, an approved software provider, e-mailed the problems. Corrections were made and we filed the Amended 12-Day Pre-General Report on January 29, 2015.

Column B error:

We made a payment November 5, 2014 for items that were disseminated during the months of September and October. In the Vocus software, payments are reported on the date that the independent expenditures were disseminated not the actual payment date. So the payment made in November was reported on the October Monthly and the 12-Day Pre-General reports.

The payment did not show up on the actual date that the expenditure was paid. This changes the monthly reports as well as the year to date totals for reports that have already been filed.

We are still in disagreement with Vocus on this procedure but they are insistent that the FEC guidelines require them to process Made v Paid items in this manner. The only way to prevent this is to not put in the dissemination date on Schedule E. If there is no dissemination date listed, the program defaults to the transaction date for the payment.

I can be reached at 703-267-1155 should you have any additional questions.

Sincerely,

Mary Rose Adkins
Treasurer
