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March 19, 2018

The Honorable Ron Wyden  
Committee on Finance  
United States Senate  
219 Dirksen Senate Office Building  
Washington, DC 20510

Dear Senator Wyden:

This is in response to your letter of March 5, following up on our letter of February 15.

As stated in our last letter, the National Rifle Association has strong policies and practices to ensure that we raise and spend our funds within the bounds of the law. These include policies and practices to avoid receiving contributions from foreign nationals in connection with United States elections. We continue to review those policies and practices, as well as our records on these matters. Based on our ongoing review, we are able to answer your questions to the best of our knowledge as follows.

1. You ask whether the NRA maintains accounts from which all, some, or no expenditures are reported to the Federal Election Commission. The answer is yes; we maintain all three types of accounts.
2. You ask whether, for each of the three types of accounts mentioned in question 1, the NRA accepts funds from foreign individuals.

No funds from foreign persons are accepted for the NRA Political Victory Fund (NRA-PVF), a political action committee that reports all of its expenditures to the FEC. Accounts that report no expenditures to the FEC, or that report only some expenditures to the FEC, receive funds from foreign persons only for purposes not connected to elections, as permitted by federal law.

You also ask whether the NRA makes transfers between the various types of accounts. Transfers between accounts are made as permitted by law.

3. You ask what types of accounts are used to make various types of political expenditures, and whether those expenditures are reported to the FEC.

The NRA makes independent expenditures, as well as expenditures for express advocacy membership communications or electioneering activities, only from accounts that report such expenditures to the FEC. These expenditures are reported to the full extent required by law.

4. You ask about our process for vetting contributions.

As mentioned in our February 15 letter, the NRA reviews contributions for compliance with other laws and as a matter of good governance.

- a) Contributions from entities that make significant contributions (a total of \$5,000 or more per year) are typically the result of fundraising activities by NRA staff members who have strong incentives to know their donors well. These staffers receive ongoing compliance training, in which they are taught that funds may not be accepted from foreign persons in connection with U.S. elections. Large, unexpected contributions from any individual or entity are obviously of great interest to fundraising staff and will prompt further research about the donor.

All contributions are processed and recorded by accounting personnel who gather this information for tax reporting and other accounting purposes. These employees have long experience with the NRA and know our major contributors well.

These practices have been followed for many years. For the relevant time period (2015-2016), we have found no significant contributions to any NRA entities sent from any foreign address or drawn on any foreign financial institution. Some contributions were received from U.S. subsidiaries of foreign entities or from U.S. companies with foreign nationals involved in their management. However, none of those entities or individuals is connected with Russia, and none of their contributions were made in connection with U.S. elections.

- b) As required by law, the NRA reports major donors on its Form 990 informational returns filed with the Internal Revenue Service. For a 501(c)(4) entity such as the NRA, donations totaling \$5,000 or more in a year are reported and are therefore considered significant.
- c) As noted in (a), experienced personnel review significant contributions from previously unknown entities. These transactions are extremely rare. The identity of the individuals involved with the entity can be determined and confirmed quickly by inquiring with other employees or by searching public records.
- d) While we do receive some contributions from foreign individuals and entities, those contributions are made directly to the NRA for lawful purposes. Our review of our records has found no foreign donations in connection with a United States election, either directly or through a conduit.

5. You ask several questions about a 2015 visit to Moscow by several people associated with the NRA, and about any fundraising activities involving Russian nationals.

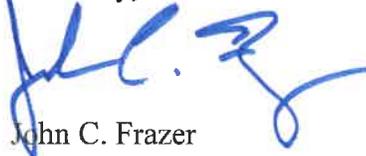
- a) Joe Gregory is a member of the Golden Ring of Freedom program. His titles of chairman (as we would describe him) or “charter member” are honorary; contrary to the phrasing of your question, Mr. Gregory is not,

and never has been, an NRA employee or contractor, and does not run any NRA program. Mr. Gregory traveled to Russia in his personal capacity.

- b) No Russian nationals have ever been members of the Golden Ring of Freedom program, either before or after the 2015 trip.
- c) Because no Russian nationals have ever been members of the Golden Ring of Freedom program, there have never been any such contributions to handle or use.

I trust this resolves your concerns about this matter.

Sincerely,



John C. Frazer  
Secretary and General Counsel

cc: The Hon. Chuck Grassley, Chairman