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## United States Senate

COMMITTEE ON FINANCE

WASHINGTON, DC 20510-6200

A. JAY KHOSLA, STAFF DIRECTOR  
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March 5, 2018

John C. Frazer  
Secretary and General Counsel  
National Rifle Association of America  
11250 Waples Mill Road  
Fairfax, VA 22030

Dear Mr. Frazer:

Thank you for your timely response to my February 2, 2018 letter to your organization. I am hopeful that with your participation we can bring this matter to a swift resolution. You have stated there has been no contact between your organization and the Federal Bureau of Investigation in relation to the reported investigation of Russian oligarch and lifetime NRA member Alexander Torshin. However, I remain concerned about the inability to get clear answers to several questions about the possibility that Russian actors funneled foreign funds into NRA electioneering activity. Clear answers to these questions are a matter of national security, campaign finance law, and American sovereignty. As such, I request that you accurately and completely answer the following questions:

1. In your February 15, 2018 letter you stated, “the NRA and its related entities do not accept funds from foreign persons or entities in connection with United States elections.” However, your organizations engage in activities both within the purview of the Federal Election Commission as well as activity outside of its purview.
  - (a) Do your organizations maintain accounts or funds from which all expenditures are reported to the Federal Election Commission (FEC)?
  - (b) Do your organizations maintain accounts or funds from which no expenditures are reported to the FEC?
  - (c) Do your organizations maintain accounts or funds from which some (but not all) expenditures are reported to the FEC?
2. For each of the funds or accounts described in (1)(a) through (1)(c) above, do your organizations accept contributions from foreign individuals? Do your organizations make transfers of funds between each of the funds or accounts described above?
3. For each of the funds or accounts described in (1)(a) through (1)(c) above, do your organizations make electioneering, issue advocacy, educational, voter mobilization, or communications expenditures (including expenditures not subject to FEC disclosure

- requirements) out of such funds or accounts? Are all such electioneering, issue advocacy, educational, voter mobilization, or communications expenditures (including expenditures not subject to FEC disclosure requirements) reported to the FEC?
4. In your February 15, 2018 letter you stated, “Significant contributions from unknown entities are vetted to ensure the legitimacy of donors.”
- (a) Please describe the steps your organization takes to ensure that domestic entities donating funds are not owned or controlled by foreign nationals. Have you reviewed any donations to your organizations in light of the allegations addressed in my February 2, 2018 letter? What were the results of any such reviews?
  - (b) Please define what your organization considers to be a “significant contribution?”
  - (c) Please describe your vetting process for these donations.
  - (d) Can you categorically state that your organizations have never, wittingly or unwittingly, received any contributions from individuals or entities acting as conduits for foreign entities or interests?
5. Public reporting indicates Mr. Torshin hosted a senior level delegation, including Joe Gregory and other NRA executives, during a weeklong trip to Moscow in December 2015.<sup>1</sup> An archived NRA profile of Mr. Gregory indicates that he is a charter member of the NRA’s Golden Ring of Freedom program.<sup>2</sup> This program is reportedly designed for “elite donors who chip in checks of \$1 million and upwards.”<sup>3</sup> Public reporting also indicates that your delegation met with several wealthy Russians while in Moscow.<sup>4</sup>
- (a) Please identify the purpose of Mr. Gregory’s December 2015 trip to Moscow and confirm whether he attended in his capacity as the individual who runs your organization’s million dollar donor program.
  - (b) Please identify any Russian nationals who were members of your organization’s “Golden Ring of Freedom” program, or any other related donor programs, prior to December 2015 or became members as a result of or in connection with the December 2015 trip to Moscow.
  - (c) Please describe how any contributions identified in connection with question (5)(b) were handled by your organization and utilized.

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<sup>1</sup> An image shared by the Russian firearms organization, “Right to Bear Arms,” during the delegation’s trip clearly shows Mr. Gregory in attendance. Facebook, “Право на оружие” Group, December 14, 2015; [www.facebook.com/PravoNaOruzie/photos/a.316742795064592.73003.298253383580200/989323151139883](https://www.facebook.com/PravoNaOruzie/photos/a.316742795064592.73003.298253383580200/989323151139883)

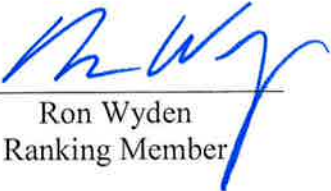
<sup>2</sup> NRA Ring of Freedom Profile, accessed via Internet Archive, March 1, 2018; <https://web.archive.org/web/20180223000828/www.nraringoffreedom.com/our-members/joe-and-cindy-gregory/>

<sup>3</sup> McClatchy, January 18, 2018; [www.mcclatchydc.com/news/nation-world/national/article195231139.html](http://www.mcclatchydc.com/news/nation-world/national/article195231139.html)

<sup>4</sup> McClatchy, January 18, 2018; [www.mcclatchydc.com/news/nation-world/national/article195231139.html](http://www.mcclatchydc.com/news/nation-world/national/article195231139.html)

Again, thank you for your prompt attention to this matter. Please provide responses to the above questions at your earliest convenience but no later than March 19, 2018. You may reach my staff at (202) 224-4515 if you have any questions or concerns in meeting this deadline.

Respectfully,



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Ron Wyden  
Ranking Member