

Return Reference	Explanation
Case 2:16-cv-06164-JAK-AS Document 91 Filed 05/17/18 Page 1 of 13 Page ID #:2902 Form 990, Part VI, Section C, Line 18	Readers are politely reminded the NRA was founded 145 years ago, in 1871. The NRA's 1944 determination letter from the Internal Revenue Service is available on Guidestar.org and can also be requested directly from the NRA as required by law. Forms 990 can be requested directly from the NRA as required by law.

Form 990, Part VI,
Section C, Line 19

NRA Bylaws, audited consolidated financial statements of the NRA and affiliates, and annual reports are available upon request for the same period of disclosure as set forth in Section 6104d. The NRA does not make internal operating policies available to the general public.

Return Reference
Form 990, Part VII,
Section A, Line 1

Explanation
This informational note regards service on the NRA Board of Directors, which is not compensated. Board members who received Forms 1099 were compensated for other professional services they performed for the organization, not for their voluntary Board service.

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Reference

Explanation

Form 990, Part
VIII, Line 2b

This informational note regards the reporting of member dues on Form 990. Line 1b of the revenue statement is properly left blank. Pursuant to 990 form instructions, membership dues that are not contributions because they compare reasonably with available benefits are reported on line 2. Thus, all NRA member dues are properly shown on the 990 revenue statement as program service revenue on line 2, other than NRA Life-plus contributions which are properly counted as contribution revenue in line 1f of the 990 revenue statement.

Return Reference	Explanation
Form 990, Part IX, Line 11	<p>This informational note regards the NRAs payment of fees for outside professional services as stated on line 11 of the 990 expense statement. Line 11b reports legal fees paid to outside attorneys, such as for Second Amendment case work and related litigation at the federal and state levels. Line 11c reports accounting fees paid to the outside CPA firm that provides the NRAs auditing and tax services. Line 11d reports lobbying expenses paid to external registered lobbyists. Line 11e reports fundraising costs paid to the authorized vendors listed on Schedule G. Line 11f reports investment management fees paid to investment advisors that manage the NRAs portfolios. Professional services performed by NRA employees in house counsel, in house accountants, in house lobbyists, in house fundraisers, and in house investment managers, respectively are properly reported on lines 5-7 of the expense statement, as required by 990 form instructions.</p>

Return
Reference

Explanation

Form 990, Part
IX, Line 24e

This response explains 15,436,766 of other expenses stated on line 24e of the 990, Part IX expense statement. This figure includes 8,452,633 other legislative not lobbying program services, 4,420,028 banking fees, 1,640,069 membership fulfillment items, 466,016 FASB ASC 715 pension accounting valuation adjustment, and 458,020 compensation of former officers.

Return Reference	Explanation
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Form 990, Part XI, Line 9	This response explains 1,757,169 of other changes in the net assets reconciliation schedule. The figure includes 1,041,579 agency transactions between the NRA and NRA Foundation and 715,590 unrealized gain on derivative instrument. The agency transactions figure of 1,041,579 includes endowment contributions and endowment earnings designated by NRA Foundation donors for eligible NRA programs. Readers may refer to Schedule D for an informational note on the derivative instrument.
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SCHEDULE R
(Form 990)

Department of the Treasury
Internal Revenue Service

Name of the organization
National Rifle Association of America

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Related Organizations and Unrelated Partnerships

► Complete if the organization answered "Yes" on Form 990, Part IV, line 33, 34, 35b, 36, or 37.

► Attach to Form 990. ► Information about Schedule R (Form 990) and its instructions is at www.irs.gov/form990.

OMB No 1545-0047

2015

Open to Public Inspection

Name of the organization
National Rifle Association of America

Employer identification number
53-0116130

Part I Identification of Disregarded Entities Complete if the organization answered "Yes" on Form 990, Part IV, line 33.							
(a) Name, address, and EIN (if applicable) of disregarded entity	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Total income	(e) End-of-year assets	(f) Direct controlling entity		
Part II Identification of Related Tax-Exempt Organizations Complete if the organization answered "Yes" on Form 990, Part IV, line 34 because it had one or more related tax-exempt organizations during the tax year.							
(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Exempt Code section	(e) Public charity status (if section 501(c)(3))	(f) Direct controlling entity	(g) Section 512(b)(13) controlled entity?	
						Yes	No
(1)NRA FOUNDATION INC 11250 WAPLES MILL RD FAIRFAX, VA 22030 52-1710886	CHARITABLE	DC	501c3	LINE 7	NRA	Yes	
(2)NRA SPECIAL CONTRIBUTION FUND PO BOX 700 RATON, NM 87740 23-7367534	CHARITABLE	NM	501c3	LINE 7	NRA	Yes	
(3)NRA CIVIL RIGHTS DEFENSE FUND 11250 WAPLES MILL RD FAIRFAX, VA 22030 52-1136665	CHARITABLE	NY	501c3	LINE 7	NRA	Yes	
(4)NRA FREEDOM ACTION FOUNDATION 11250 WAPLES MILL RD FAIRFAX, VA 22030 26-1277941	CHARITABLE	VA	501c3	LINE 7	NRA	Yes	
(5)NRA POLITICAL VICTORY FUND 11250 WAPLES MILL RD FAIRFAX, VA 22030 52-1083020	PAC/SSF	VA	527		NRA		No

Part III

Identification of Related Organizations Taxable as a Partnership

Complete if the organization answered "Yes" on Form 990, Part IV, line 34 because it had one or more related organizations treated as a partnership during the tax year.

(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Direct controlling entity	(e) Predominant income(related, unrelated, excluded from tax under sections 512- 514)	(f) Share of total income	(g) Share of end-of-year assets	(h) Disproportionate allocations?		(i) Code V-UBI amount in box 20 of Schedule K-1 (Form 1065)	(j) General or managing partner?		(k) Percentage ownership
							Yes	No		Yes	No	

Part IV

Identification of Related Organizations Taxable as a Corporation or Trust

Complete if the organization answered "Yes" on Form 990, Part IV, line 34 because it had one or more related organizations treated as a corporation or trust during the tax year.

(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Direct controlling entity	(e) Type of entity (C corp, S corp, or trust)	(f) Share of total income	(g) Share of end- of-year assets	(h) Percentage ownership	(i) Section 512 (b)(13) controlled entity?	
								Yes	No

Part V Transactions With Related Organizations Complete if the organization answered "Yes" on Form 990, Part IV, line 34, 35b, or 36.

Note. Complete line 1 if any entity is listed in Parts II, III, or IV of this schedule

1 During the tax year, did the organization engage in any of the following transactions with one or more related organizations listed in Parts II-IV?

- a** Receipt of **(i)** interest, **(ii)** annuities, **(iii)** royalties, or **(iv)** rent from a controlled entity
- b** Gift, grant, or capital contribution to related organization(s)
- c** Gift, grant, or capital contribution from related organization(s)
- d** Loans or loan guarantees to or for related organization(s)
- e** Loans or loan guarantees by related organization(s)

- f** Dividends from related organization(s)
- g** Sale of assets to related organization(s)
- h** Purchase of assets from related organization(s)
- i** Exchange of assets with related organization(s)
- j** Lease of facilities, equipment, or other assets to related organization(s)

- k** Lease of facilities, equipment, or other assets from related organization(s)
- l** Performance of services or membership or fundraising solicitations for related organization(s)
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- m** Performance of services or membership or fundraising solicitations by related organization(s)
- n** Sharing of facilities, equipment, mailing lists, or other assets with related organization(s)
- o** Sharing of paid employees with related organization(s)

- p** Reimbursement paid to related organization(s) for expenses
- q** Reimbursement paid by related organization(s) for expenses

- r** Other transfer of cash or property to related organization(s)
- s** Other transfer of cash or property from related organization(s)

	Yes	No
1a	Yes	
1b		No
1c	Yes	
1d		No
1e		No
1f		No
1g		No
1h		No
1i		No
1j		No
1k		No
1l	Yes	
1m		No
1n	Yes	
1o	Yes	
1p		No
1q	Yes	
1r		No
1s		No

2 If the answer to any of the above is "Yes," see the instructions for information on who must complete this line, including covered relationships and transaction thresholds

(a) Name of related organization	(b) Transaction type (a-s)	(c) Amount involved	(d) Method of determining amount involved
See Additional Data Table			

Provide the following information for each entity taxed as a partnership through which the organization conducted more than five percent of its activities (measured by total assets or gross revenue) that was not a related organization. See instructions regarding exclusion for certain investment partnerships.

[illegible]

Part VII **Supplemental Information** Case 2:16-cv-06164-JAK-AS Document 91 Filed 05/17/18 Page 12 of 13 Page ID #:2913

Provide additional information for responses to questions on Schedule R (see instructions)

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Part II	The NRA is a 501c4 membership association with four 501c3 public charities and a Section 527 political action committee PAC, which is a separate segregated fund. The four charities affiliated with the NRA are NRA Civil Rights Defense Fund, NRA Foundation Inc, NRA Freedom Action Foundation, and NRA Special Contribution Fund DBA Whittington Center. The PAC is the NRA Political Victory Fund. NRAPVF is a separate unincorporated PAC of the NRA. In the event that any funds are received by the NRA and earmarked to the PAC, the NRA has systems in place to ensure any such receipts are promptly and immediately deposited into the separate segregated funds accounts. The NRA did not take possession of any earmarked PAC contributions from its members; all contributions to the PAC were directly received by the PAC from contributors. Therefore, there were no reportable transactions between the NRA and the PAC for the purposes of any Part V, line 2 disclosures.
Part V Line 1c	This informational note regards qualified charitable grantmaking. All grants made by NRA Foundation and NRA Civil Rights Defense Fund to the NRA are subject to stringent review processes requiring that the grants be made and used only for qualified charitable purpose programs. The NRA is required to provide an accounting to the charities as documentation that proceeds were used by the NRA for the qualified charitable purposes as set forth in the grant documents.

Additional Data**Software ID:** 15000290**Software Version:** 15.3.0.0**EIN:** 53-0116130**Name:** National Rifle Association of America**Form 990, Schedule R, Part V - Transactions With Related Organizations**

(a) Name of related organization		(b) Transaction type(a-s)	(c) Amount Involved	(d) Method of determining amount involved
(1)	NRA FOUNDATION INC	a	180,000	CASH VALUE
(1)	NRA FOUNDATION INC	c	18,985,029	CASH VALUE
(2)	NRA FOUNDATION INC	o	4,554,288	CASH VALUE
(3)	NRA FOUNDATION INC	q	1,102,826	CASH VALUE
(4)	NRA CIVIL RIGHTS DEFENSE FUND	c	83,227	CASH VALUE
(5)	NRA CIVIL RIGHTS DEFENSE FUND	q	68,361	CASH VALUE
(6)	NRA SPECIAL CONTRIBUTION FUND	a	120,000	CASH VALUE
(7)	NRA SPECIAL CONTRIBUTION FUND	q	1,548,258	CASH VALUE