



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

THIS IS THE BEGINNING OF MUR # 4680

DATE FILMED 1-12-98 CAMERA NO. 2

CAMERAMAN E.S.

98043853822

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: July 25, 1997

ANALYST: Andrea Wilkens

I. COMMITTEE: Democratic Party of Oklahoma
(C00190934)
Christine Minyard, Treasurer
P.O. Box 25426
Oklahoma City, OK 73125

II. RELEVANT STATUTE: 2 U.S.C. §434 (a)(4)(A)(iii) and (iv)
11 CFR §104.5(c)(1)(iii) and (2)(i)

III. BACKGROUND:

Chronic Late Filing of Reports

The Democratic Party of Oklahoma has failed to file three (3) Reports of Receipts and Disbursements in a timely manner for the 1995-1996 election cycle (see attached chart). The reports were filed between forty (40) and sixty-seven (67) calendar days late.

On January 24, 1996, the Committee filed a cover letter with its Amended 1995 Mid-Year Report. The letter stated that it hired an Executive Officer/Director to correct past filing problems (Attachment 7).

On March 1, 1996, a Chronic Late Filer Notice was sent to the Committee for failing to file the 1995 Mid-Year and the 1995 Year-End Reports in a timely manner (Attachment 9). The notice advised the Committee that any additional late filing of reports may result in legal enforcement action.

On July 17, 1996, the Committee filed a cover letter with its Amended 1996 April Quarterly Report. The Committee reiterated its attempt to file accurate and timely reports. The letter included a copy of an internal committee memo which

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referenced the Chronic Late Filer Notice and the Committee's concerns regarding the timely filing of the reports (Attachment 11).

Subsequent to the sending of the Chronic Late Filer Notice, the Committee failed to timely file the 1996 30 Day Post-General Report.

On February 10, 1997, the Committee filed a cover letter with its Amended 1996 October Quarterly Report which stated that its recent delays in filing were caused by a need to automate the reporting process. The Committee hopes to install a software package to aid in the completion of reports (Attachment 16).

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LATE FILING HISTORY

<u>REPORT TYPE</u>	<u>PRIOR NOTICE</u>	<u>DATE DUE</u>	<u>NON-FILER NOTICE</u>	<u>DATE FILED</u>
1995 Mid-Year (1/1/95-6/30/95)	12/28/94 (Attachment 2) 7/07/95 (Attachment 3)	7/31/95	8/17/95 (Attachment 4) ¹	10/06/95 (Attachment 5)
1995 Year End (7/1/95-12/31/95)	12/28/94 (Attachment 2) 12/29/95 (Attachment 6)	1/31/96	2/23/96 (Attachment 8)	3/23/96 (Attachment 10)
1996 30 Day Post-General (10/1/96-11/25/96)	12/29/95 (Attachment 6) 9/30/96 (Attachment 12) 11/08/96 (Attachment 13)	12/05/96	1/06/97 (Attachment 14) ²	1/14/97 (Attachment 15)

¹ The Non-Filer Notice was originally sent to the Committee's former address of record. The Notice was returned and remailed to the current address of record on September 6, 1995.

The Non-Filer Notice was sent via mailgram.

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILE		
DEMOCRATIC PARTY OF OKLAHOMA				ID #C00190934		PARTY QUALIFIED
CONNECTED ORGANIZATION	DNC/BIRTHDAY VIC FD					
1995	MID-YEAR REPORT	31,542	37,099	1JAN95 -31JUL95	32	95FEC/999/4044
	MID-YEAR REPORT - AMENDMENT	30,465	35,731	1JAN95 -30JUN95	36	96FEC/019/1654
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN95 -30JUN95	11	96FEC/050/2246
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN95 -30JUN95	3	96FEC/056/1331
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN95 -30JUN95	5	96FEC/059/1267
	NOTICE OF FAILURE TO FILE			1JAN95 -30JUN95	2	95FEC/994/2893
	REQUEST FOR ADDITIONAL INFORMATION			1JAN95 -30JUN95	2	96FEC/037/4859
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN95 -30JUN95	3	96FEC/047/4822
	REQUEST FOR ADDITIONAL INFORMATION			1JAN95 -30JUN95	3	96FEC/054/5043
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN95 -30JUN95	2	96FEC/059/3054
	REQUEST FOR ADDITIONAL INFORMATION			1JAN95 -31JUL95	5	95FEC/008/3801
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN95 -31JUL95	2	96FEC/013/4591
	YEAR-END	3,987	5,199	1JUL95 -31DEC95	7	96FEC/036/1675
	YEAR-END - AMENDMENT			1JUL95 -31DEC95	5	96FEC/050/2260
	NOTICE OF FAILURE TO FILE			1JUL95 -31DEC95	2	96FEC/032/0959
	REQUEST FOR ADDITIONAL INFORMATION			1JUL95 -31DEC95	3	96FEC/037/4861
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL95 -31DEC95	3	96FEC/047/4819
	REQUEST FOR ADDITIONAL INFORMATION			1JUL95 -31DEC95	2	96FEC/054/5041
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL95 -31DEC95	1	96FEC/059/3053
1996	MISCELLANEOUS NOTICE FROM FEC			1MAR96	2	96FEC/032/4613
	MISCELLANEOUS REPORT TO FEC			21OCT96	2	96FEC/107/0175
	STATEMENT OF ORGANIZATION - AMENDMENT			22OCT96	1	96FEC/110/1606
	APRIL QUARTERLY	33,128	3,748	1JAN96 -31MAR96	13	96FEC/045/0927
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN96 -31MAR96	3	96FEC/050/2257
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN96 -31MAR96	5	96FEC/057/3871
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN96 -31MAR96	4	96FEC/058/3569
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN96 -31MAR96	4	96FEC/060/2916
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN96 -31MAR96	9	96FEC/064/4658
	APRIL QUARTERLY - AMENDMENT	34,028	4,648	1JAN96 -31MAR96	15	96FEC/110/1607
	REQUEST FOR ADDITIONAL INFORMATION			1JAN96 -31MAR96	2	96FEC/054/5039
	REQUEST FOR ADDITIONAL INFORMATION			1JAN96 -31MAR96	7	96FEC/054/5069
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN96 -31MAR96	2	96FEC/059/3050
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN96 -31MAR96	1	96FEC/059/3052
	JULY QUARTERLY	29,676	51,920	1APR96 -30JUN96	14	96FEC/064/4644
	JULY QUARTERLY - AMENDMENT	30,740	52,984	1APR96 -30JUN96	17	96FEC/071/2570
	JULY QUARTERLY - AMENDMENT	-	-	1APR96 -30JUN96	2	96FEC/084/0592
	JULY QUARTERLY - AMENDMENT	32,476	54,720	1APR96 -30JUN96	18	96FEC/110/1622
	REQUEST FOR ADDITIONAL INFORMATION			1APR96 -30JUN96	3	96FEC/077/3652
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR96 -30JUN96	4	96FEC/083/0702

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COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
	OCTOBER QUARTERLY	56,736	64,438	1JUL96 -30SEP96	22	96FEC/110/1640
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL96 -30SEP96	4	97FEC/183/0566
	1 ST LETTER INFORMATIONAL NOTICE			1JUL96 -30SEP96	2	96FEC/163/1753
	POST-GENERAL	143,982	142,462	1OCT96 -25NOV96	31	97FEC/166/3589
	NOTICE OF FAILURE TO FILE			1OCT96 -25NOV96	2	97FEC/165/1035
	REQUEST FOR ADDITIONAL INFORMATION			11OCT96 -25NOV96	10	97FEC/189/3099
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT96 -25NOV96	11	97FEC/193/4585
	YEAR-END	14,391	8,769	26NOV96 -31DEC96	13	97FEC/183/0570
	YEAR-END - AMENDMENT			26NOV96 -31DEC96	3	97FEC/208/2113
	YEAR-END - AMENDMENT			26NOV96 -31DEC96	10	97FEC/211/1219
	REQUEST FOR ADDITIONAL INFORMATION			26NOV96 -31DEC96	3	97FEC/200/0732
	REQUEST FOR ADDITIONAL INFORMATION 2ND			26NOV96 -31DEC96	4	97FEC/204/3839
	TOTAL	316,065	0 315,967 0		372	TOTAL PAGES

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All reports covering 1995 and 1996 activity have been reviewed.

Ending Cash-on-Hand as of 12/31/96: \$6606.30

Debts and Obligations Owed to the Committee as of 12/31/96: \$0.00

Debts and Obligations Owed by the Committee as of 12/31/96: \$4411.91

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 28, 1994

QUARTERLY AND MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	11/29/94 - 12/31/94	01/31/95	01/31/95

WHO MUST FILE

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

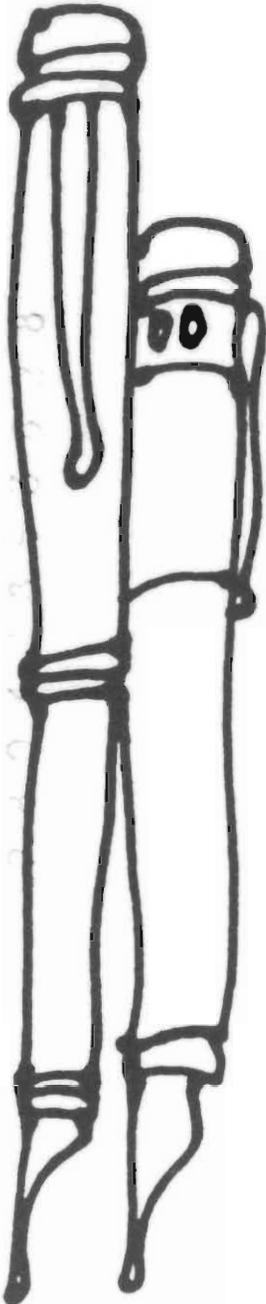
COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

*The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

**Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)



**1995 REPORTING SCHEDULE
PACs AND PARTIES***

I. SEMIANNUAL FILERS**

REPORT	PERIOD COVERED	REG./CERT.	FILING
		MAILING DATE***	DATE
Mid-Year	01/01/95 - 06/30/95	07/31/95	07/31/95
Year-End	07/01/95 - 12/31/95	01/31/96	01/31/96

II. MONTHLY FILERS

REPORT	PERIOD COVERED	REG./CERT.	FILING
		MAILING DATE***	DATE
February	01/01/95 - 01/31/95	02/20/95	02/20/95
March	02/01/95 - 02/28/95	03/20/95	03/20/95
April	03/01/95 - 03/31/95	04/20/95	04/20/95
May	04/01/95 - 04/30/95	05/20/95	05/20/95
June	05/01/95 - 05/31/95	06/20/95	06/20/95
July	06/01/95 - 06/30/95	07/20/95	07/20/95
August	07/01/95 - 07/31/95	08/20/95	08/20/95
September	08/01/95 - 08/31/95	09/20/95	09/20/95
October	09/01/95 - 09/30/95	10/20/95	10/20/95
November	10/01/95 - 10/31/95	11/20/95	11/20/95
December	11/01/95 - 11/30/95	12/20/95	12/20/95
Year-End	12/01/95 - 12/31/95	01/31/96	01/31/96

*Committees that wish to change their filing status must notify the Commission in writing.

**Committees that filed quarterly reports in 1994 are only required to file semiannually in 1995.

***Reports sent registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

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SEMI-ANNUAL REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

July 7, 1995

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Mid-Year	01/01/95 - 06/30/95	07/31/95	07/31/95

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) which normally file on a quarterly basis must file a Mid-Year Report in July.

INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with a special election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission in writing when filing a report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

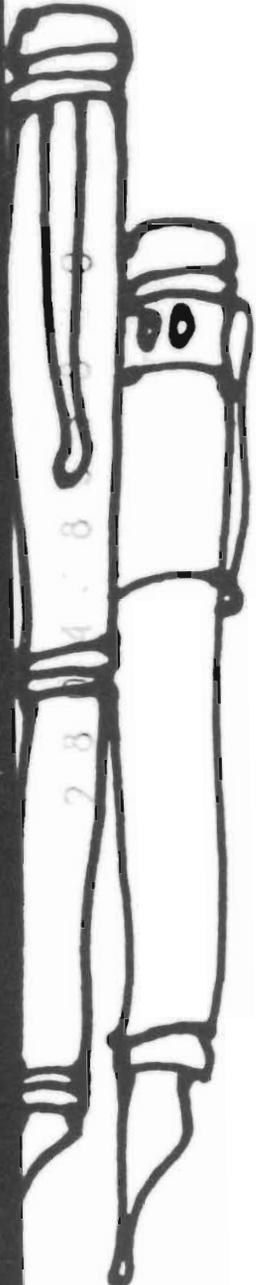
COMPLIANCE

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-PEC forms (except for FEC approved computer generated forms) will be required to refile.

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

**Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

FOR INFORMATION, CALL: 800/424-9530 or 202/219-3420





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-7

August 17, 1995

Christine Minyard, Treasurer
Democratic Party of Oklahoma
128 Robert S. Kerr Ste. 510
Oklahoma City, OK 73102

Identification Number: C00190934

Reference: 1995 Mid-Year Report (1/1/95-6/30/95)

Dear Ms. Minyard:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Reports of Receipts and Disbursements. You were notified previously of the due dates for these reports.

It is important that you file these reports immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). Copies of the reports or the relevant portions should also be filed with the Secretary of State or equivalent state officer. 2 U.S.C. §439

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions regarding this matter, please contact Neil Evans on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

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REPORT OF RECEIPTS AND DISBURSEMENTS

Attachment 5

Authorized Committee
(Summary Page)

Oct 10 11 54 AM '95

[Page 1 of 2]

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Democratic Party of Oklahoma

ADDRESS (number and street) Check if different than previously reported.
Post Office Box 25426

CITY, STATE and ZIP CODE
Oklahoma City, Oklahoma 73102

STATE/DISTRICT
OK

2. FEC IDENTIFICATION NUMBER
000190934

3. IS THIS REPORT AN AMENDMENT?
 YES NO

4. TYPE OF REPORT

April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year End Report

July 31 Mid-Year Report (Non-election Year Only)

Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

Thirtieth day report following the General Election on _____ in the State of _____

Termination Report

This report concerns activity for Primary Election General Election Special Election Runoff Election

SUMMARY

6	Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
	January 1 through July 31, 1995		
5	Net Contributions (other than loans)		
(a)	Total Contributions (other than loans) (from Line 11(a))	31,542.11	31,542.11
(b)	Total Contribution Refunds (from Line 20(d))	-0-	-0-
(c)	Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	31,542.11	31,542.11
7	Net Operating Expenditures		
(a)	Total Operating Expenditures (from Line 17)	28,099.32	28,099.32
(b)	Total Offsets to Operating Expenditures (from Line 14)	-0-	-0-
(c)	Net Operating Expenditures (subtract Line 7(b) from 7(a))	28,099.32	28,099.32
8	Cash on Hand at Close of Reporting Period (from Line 27)	328.67	
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	

For further information contact:
Federal Election Commission
904 E Street, NW
Washington, DC 20463
Toll Free 800-424-9630
Local 202-218-3420

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Signature of Treasurer

Date

10/6/95

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437c.

FEC FORM 3
(revised 4/87)

current obligations of the Democratic Party of Oklahoma are reflected and carried on the committee's State accounts, and are so reflected in State reports.

29 85 0 13 9 8 59 3 0 24

Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

Hand Delivered

DATE OF RECEIPT

First Class Mail

POSTMARKED

Registered/Certified Mail

POSTMARKED

10/6/95

No Postmark

Postmark Illegible

Received from the House Office of Records
and Registration

DATE OF RECEIPT

Received from the Senate Office of Public
Records

DATE OF RECEIPT

Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

J.A.Q.
PREPARER

10/11/95
DATE PREPARED

8502228253053

YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1995

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report on January 31, 1996.

REPORT CONTENT AND DATES

I. Semiannual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/95 - 12/31/95	01/31/96	01/31/96

Semiannual filers must disclose financial activity that occurred from July 1 through December 31, 1995, on their Year-End Report.

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/95 - 12/31/95	01/31/96	01/31/96

Monthly filers must disclose financial activity from December 1 through December 31, 1995, on their Year-End Report.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

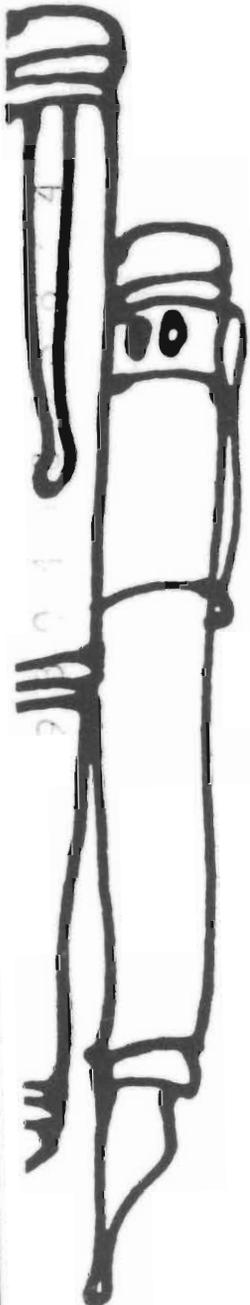
COMPLIANCE

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

**Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)



PARTIES AND PACS

YEAR-END

1996 FILING SCHEDULE

I. Quarterly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April	01/01/96 - 03/31/96	04/15/96	04/15/96
July	04/01/96 - 06/30/96	07/15/96	07/15/96
October	07/01/96 - 09/30/96	10/15/96	10/15/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
-----24 Hour Reports***-----			
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
February	01/01/96 - 01/31/96	02/20/96	02/20/96
March	02/01/96 - 02/29/96	03/20/96	03/20/96
April	03/01/96 - 03/31/96	04/20/96	04/20/96
May	04/01/96 - 04/30/96	05/20/96	05/20/96
June	05/01/96 - 05/31/96	06/20/96	06/20/96
July	06/01/96 - 06/30/96	07/20/96	07/20/96
August	07/01/96 - 07/31/96	08/20/96	08/20/96
September	08/01/96 - 08/31/96	09/20/96	09/20/96
October	09/01/96 - 09/30/96	10/20/96	10/20/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
-----24 Hour Reports***-----			
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

**Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

***PACs that make independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours before the election must file 24 Hour Reports. Party committees may not make independent expenditures.

FOR INFORMATION, CALL: 800/424-9530 or 202/219-3420

JAN 23 3 4 11 PM '96



January 23, 1996

John D Gibson
 Assistant Staff Director
 Reports Analysis Division
 Federal Election Commission
 Washington, D.C. 20463

Dear Mr. Gibson:

The Oklahoma Democratic Party, in response to the January 4, 1996 Federal Election Commission letter, is immediately sending in the report per a phone conversation with Mr. Vincent R. Tallman. Mr. Tallman recommended the Party name an Assistant Treasurer in order to comply with the January 4th letter. The Party has named Mr. Patrick J. Hall as the Assistant Treasurer.

The Oklahoma Democratic Party has hired Patrick J. Hall, CAE as the Chief Executive Officer and Executive Director of the Party. We are in hopes that any past filing problems are just that "PAST". Please call on me for any further information.

Sincerely,

Betty McElderry

Betty McElderry, Chairwoman
 Oklahoma Democratic Party

BM:sc

2932974 81593185 62

B.t

P.O. Box 25429 73125
 228 Robert S. Kerr, Suite 510, Oklahoma City, Oklahoma 73102
 405/239-2700 FAX 405/236-8009





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

February 23, 1996

Christine Minyard, Treasurer
Democratic Party of Oklahoma
P.O. Box 25426
Oklahoma City, OK 73125

Identification Number: C00190934

Reference: Year End Report (7/1/95-12/31/95)

Dear Ms. Minyard:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Secretary of the Senate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Vince Tallman on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MS-L

MAR 1 1996

Christine Minyard, Treasurer
Democratic Party of Oklahoma
P.O. Box 25426
Oklahoma City, OK 73125

Identification Number: C00190934

Reference: 1995-1996 Election Cycle Reports

Dear Ms. Minyard:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year (1/1/95-6/30/95)	7/31/95	10/06/95
Year End (7/1/95-12/31/95)	1/31/96	not filed

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views failure to timely file reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Vince Tallman on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Lisa J. Stolaruk
Chief, Party/Non-Party Branch
Reports Analysis Division

9804303246138

STATEMENTS OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee (Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

Attachment 10
FEDERAL ELECTION
COMMISSION
MAIL ROOM
[Page 1 of 2]
MAR 25 11 02 AM '96

1. NAME OF COMMITTEE (in full)
 DEMOCRATIC PARTY OF OKLAHOMA

ADDRESS (number and street) Check if different than previously reported
 P.O. Box 25426

CITY, STATE and ZIP CODE
 OKLAHOMA CITY, OK 73125

2. FEC IDENTIFICATION NUMBER
 C 00190934

3. This committee has qualified as a multicandidate committee (see FEC FORM 1M)

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report

- Monthly Report Due On:
- February 20
 - March 20
 - April 20
 - May 20
 - June 20
 - July 20
 - August 20
 - September 20
 - October 20
 - November 20
 - December 20
 - January 31

- Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? YES NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	JULY 1995 through DECEMBER 1995		
6. (a) Cash on Hand January 1, 1995			\$ 9,636.35
(b) Cash on Hand at Beginning of Reporting Period		\$ 4,369.56	
(c) Total Receipts (from Line 19)		\$ 3,987.68	\$ 34,452.68
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 8,357.24	\$ 44,089.03
7. Total Disbursements (from Line 30)		\$ 5,199.27	\$ 40,931.06
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 3,157.97	\$ 3,157.97
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$	

Per further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-219-3420

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer
PATRICK J. HALL, ASSISTANT TREASURER

Signature of Treasurer
Patrick J. Hall

Date
MARCH 18, 1996

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

Hand Delivered

DATE OF RECEIPT

First Class Mail

POSTMARKED

Registered/Certified Mail

POSTMARKED

3-23-96

No Postmark

Postmark Illegible

Received from the House Office of Records
and Registration

DATE OF RECEIPT

Received from the Senate Office of Public
Records

DATE OF RECEIPT

Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

JEB

PREPARER

3-25-96

DATE PREPARED

96030361681



Post Office Box 25426 • Oklahoma City, OK 73125-0426
Phone: (405) 239-2700 • Fax: (405) 236-8009

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM
JUL 17 9 33 AM '96

June 19, 1996

~~Via Facsimile, Original to Follow~~

Mr. Vince Tallman
Federal Election Commission
Washington, D.C. 20463

Reference: April Quarterly Report for 1996

Dear Vincent:

In your letter of June 5th, you raised FEC concerns regarding the difference between the ending balance in the final 1995 quarterly 3x filing, and beginning balance for the April 15th quarterly 3x filing.

I asked the Party's administrative consultant, Michael O'Hasson, to consolidate information regarding this matter into a memorandum, which is attached for your clarification.

At this point, we have been concentrating on ensuring that all state and federal reports since January 1, 1996, are both accurate and filed in a timely manner. As you already know from previous correspondence, the Oklahoma Democratic Party did not have a staff from May of 1995 through January of 1996. I did not assume the Executive Director's post until February 1st, and Mr. O'Hasson was not retained until April.

Unfortunately, we are unfamiliar with the any of the previous staff's administrative and accounting procedures utilized during 1995 and before.

If you have any suggestions or advice, I would more than welcome it.

As always, thank you very much for your assistance in resolving the Party's outstanding matters before the Commission.

Sincerely,


Patrick J. Hall
Executive Director

cc: FEC Binders

23943853841

IDL CLIENT MEMORANDUM

Date: 06/18/96
To: Patrick J. Hall, Oklahoma Democratic Party
CC: Deborah Robertson Elmore, IDL Business Services
From: Michael O'Hasson, IDL Internet Services
Subject: ReCap of FEC Interactions

Per your request, here is a "recap" of the ODP's recent experiences and communications with the FEC. Both myself and Ms. Elmore will wait to hear from you regarding future activities on FEC work.

The Oklahoma Democratic Party did not have a paid staff from May of 1995 until you were retained on February 1, 1996. Its offices moved at least twice in eighteen months.

During this time, the volunteer party chair, Betty McElderry, kept the Party's infrastructure together, paid its bills and ran the organization mostly from her home and her automobile. At some point during the summer of 1995, as she told you in the past, Ms. McElderry's automobile was stolen. It is not known what, if any, filing or other records were in the vehicle at the time of the theft.

My initial review of the past records of ODP brought mixed results. Nearly all of the source records were in a state of chaos, but, miraculously, were still available.

Source records are those which prove the basic level of transactions. They consist of such items as deposit tickets, invoices, checks, checking account registers, invoices and reports on who gave what to the ODP when.

There appeared to be very few source records missing, and I believe the losses identified so far can be replaced upon request.

All in all, it took nearly four weeks to locate, organize and refile source documents into any sort of usable system. Even then, I only attempted to reorganize source records for 1994, 1995 and 1996. Others were left in their storage boxes. All banking records were reorganized back to the beginnings of each account.

[next page, please]

CONFIDENTIAL

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Before you accepted the ODP post on February 1, 1996, a problem was discovered in regard to a pending FEC review of a Form 3X filed by former staffers for the period of January to June of 1995.

An FEC inquiry letter dated November 21, 1995, had not received an ODP response for six weeks.

In its letter, the FEC had requested clarification on several portions of the January to June filing (my recollection is that the Form 3X filed by the former staffers did not conform to the correct reporting period).

The FEC's main concern revolved around a reporting entry the agency perceived was a transfer of funds from the State Account to the Federal Account.

Unless for an allocated share of some activity, and reported specifically as such, transfers of non-federal funds to a federal account is not permitted under FEC regulations.

A letter drafted for Christine Minyard by one of the former staffers was obtained, and that letter explained there was no improper transfer, but monies had been transferred from the federal Coordinated Campaign account to the parent Federal Account.

At this time, we also attempted to correct some Schedule A itemization mistakes. To perform this work, we relied totally on the Schedule A entries produced by the former staff. The seven pages of the original Schedule B (line 21-c) were not amended. However, we did add a Schedule B page for line 22 to show a transfer of \$9,000 in state PAC contributions which had been mistakenly deposited in the Federal Account and were being transferred back to the State Account.

The amended Form 3X for January/July 1995 was completed and signed on January 23, 1996.

Three weeks after you accepted the ODP position, you received a February 23, 1996, letter informing you the ODP had not filed a Form 3X for the period of July/December 1995. This report had been due on January 15, 1996.

Work was undertaken immediately to take source records from that period and consolidate the data needed for the Form 3X.

(next page, please)

A week later, in a letter dated March 1, 1996, the FEC's Party/Non-Party Branch Chief, Lisa Stolaruk, indicated that any future Form 3X reports not filed in a timely manner would be regarded as a "serious violation of the Act".

We advised you this was a signal to ensure that timeliness became the number one priority on Form 3X filings, even those due before your tenure. Work was accelerated on the July/December 1995 report, even though it delayed work on the First Quarter 1996 Form 3X report.

This July/December 1995 Form 3X report was completed and signed on March 18, 1996.

Work resumed on consolidating data for the 1st Quarter 1996 Form 3X, and establishing beginning account balances for the new ODP accounting system which would account for all ODP transactions from January 1, 1996, onward.

On March 19th, we first undertook calculations for determining the correct January 1, 1996, balances for the all ODP's banking accounts.

It was at this point we reconciled the actual December 31, 1995, balance in the Federal Account at \$30.49, and not the \$3,157.97 which was thought to be correct at the time of the July/December 1995 Form 3X filing.

In an FEC letter dated April 3, 1996, Vincent Tallman first familiarized the new staff at ODP with the Schedule H-1 and the BALLOT COMPOSITION METHOD of allocating certain expenses. This method is used to determine the fair share of various shared expenses between the State Account and the Federal Account.

I subsequently telephoned Mr. Tallman, and requested a copy of the ODP's Schedule H-1, which the former staff should have filed in 1995. At a later date, Mr. Tallman shipped me a packet of materials on cost allocation, as well as a new Schedule H-1. He had discovered the former ODP staff had not filed a Schedule H-1 in 1995, as required.

In another April 3rd letter, Mr. Tallman requested some clarifications on the July/December 1995 Form 3X Filing, as well.

(next page, please)

On April 15th, the Form 3X for the 1st Quarter of 1996 was completed and signed.

Also on April 15th, you notified Mr. Tallman of the mismatch between the December 31, 1995, ending balance on the July/December Form 3X report and the beginning balance of the 1st Quarter 1996 Form 3X report.

Our decision was to begin the 1996 Form 3X series with the reconciled, correct banking balances for January 1st, and await FEC information on how to correct the 1995 report's ending balance. Ms. Stolaruk's previous letter made us feel uncomfortable about delaying the 1st Quarter 1996 filing while awaiting FEC instructions.

J.H

On April 25th, the ODP received a second request for clarification of the items mentioned in Mr. Tallman's letters of April 3rd

On May 10, 1996, the ODP sent Mr. Tallman a letter in response to his April 3rd inquiries on the January/June 1995 Form 3X filing. In that letter, the ODP provided the addresses of some persons who had received disbursements from the ODP. Those addresses had been omitted by the former staff in the original filing.

A second May 10th letter answered Mr. Tallman's April 3rd inquiry regarding the July/December 1995 Form 3X filing. Information on total administrative expenses paid from both the State and Federal accounts was provided.

[next page, please]

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A separate letter detailing administrative expenses paid from the State and Federal accounts for the 1st Quarter of 1996 was sent to Mr. Tallman on May 12th. That letter also indicated a Schedule H-1 would subsequently be prepared and sent to the FEC.

The ODP most recently received two letters from Mr. Tallman, both dated June 5th. There were three major issues raised in the two letters:

- The FEC had received the previous information on 1995-96 administrative expenses, and now wanted the ODP to determine the correct Federal-State percentage share for each reporting period. The split would be based on the recently filed Schedule H-1. Therefore, the Federal Account could pay no more than 43% of administrative expenses.
- Some registration receipts from the Carl Albert Awards Banquet paid by state candidate campaign committees were mistakenly deposited in the Federal Account instead of the State Account. The FEC wanted those funds transferred back to the State Account, because these state candidate committees were not registered with the FEC.
- Mr. Tallman officially noted the difference between the ending balance on the July/December 1995 Form 3X ending balance and the beginning balance for the 1st Quarter 1996 Form 3X.

The ODP responded first to the deposit of state candidate committee monies for Carl Albert Awards Dinner registrations in the Federal Account by mistake.

A review of the record indicates some of the attendees completed federal contributor forms at the banquet registration table, thus the staff routed those registrations for deposit in the Federal Account.

(next page, please)

In an ODP letter to Mr. Tallman on June 19th, the circumstances of the deposits were explained, and a transfer of \$2,325 was made on that same date from the Federal Account to the State Account as recommended by the FEC.

The issue of the mismatched Form 3X ending and beginning balances between 1995 and 1996 is a most difficult one.

As we've relayed earlier, its likely that the balance discrepancy resulted from a checkbook entry error and subsequent failure to reconcile bank account statements. If unreconciled check registers were used as a foundation for Form 3X reports, the incorrect balance could have crept into the reports at any time during the past one or two years.

Consequently, the only way to make it likely the discrepancy could be located would be to undertake a comprehensive review of all 1994 and 1995 ODP financial transactions, source records and banking documents.

Beginning with December of 1995, and working backward, each fiscal month would require a complete reconciliation of all contribution, disbursement and banking information.

Such a review could take two months and cost the Party 2-3 times more than the discrepancy itself. A review of 1994 and 1995 Form 3X reports would also divert staff and consultants from their current efforts to implement new accounting and contributor tracking systems in advance of the 1996 primary election season.

Our hope is that you can obtain advice from the FEC on how to resolve the issue without interrupting the current efforts to improve reporting and tracking systems, or causing financial stress for the organization.

At this time, we are working on resolving the issue of determining the appropriate State and Federal account share of administrative expenses during the period of January 1, 1995 to March 31, 1996. You can expect to respond to Mr. Tallman no later than Wednesday, June 26th.

In addition, we have begun reconciliation of all accounts and databases necessary to file the 2nd Quarter 1996 Form 3X report by July 15th.

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I hope this information pieces together a "big picture" of the many individual interactions with the FEC which have occurred before and after you became Executive Director of the ODP.

If we can be of further assistance, please let us know.

DigitalDoc: FEC01

98043853848

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 30, 1996

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

III. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16***

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/96 - 11/25/96	12/05/96	12/05/96

WHO MUST FILE

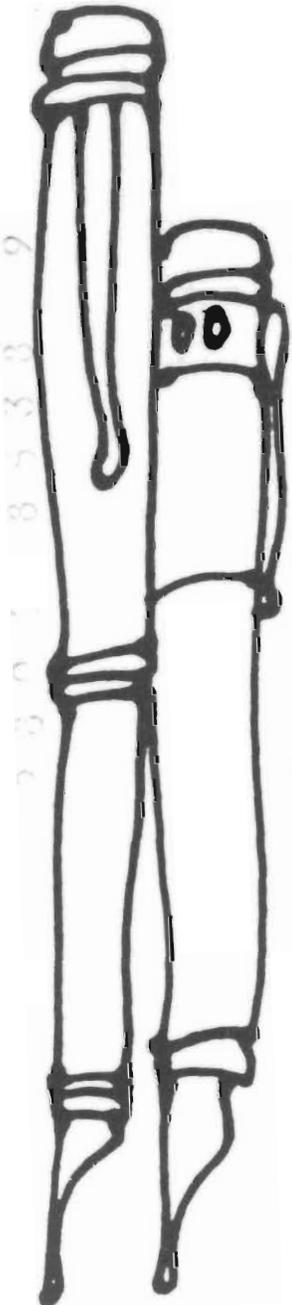
Party committees and PACs must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 5 (the Pre-General Report). All Party committees and PACs, regardless of financial activity, must file a report 30 days after the general election (the Post-General Election Report).

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

**Reports sent registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

***Committees that made general election contributions or expenditures before October 1 and did not previously report them must also follow Chart II reporting requirements.

(over)



GENERAL ELECTION

REPORT NOTICE

FEDERAL ELECTION COMMISSION



REMINDER

REMINDER

REMINDER

November 8, 1996

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Post-General Election Report. Reports sent by registered or certified mail must be postmarked by the mailing date (December 5, 1996); otherwise, they must be received by the filing date (December 5, 1996). FEC Form 3X is enclosed.

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RQ-7

(This is a copy of the text of a mailgram sent to the committee listed below on January 6, 1997.)

Christine Minyard, Treasurer
Democratic Party of Oklahoma
P.O. Box 25426
Oklahoma City, OK 73125

Identification Number: C00190934

Reference: 30 Day Post-General Report (10/1/96-11/25/96)

Dear Ms. Minyard:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Secretary of the Senate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer. 11 CFR §§108.2, 108.3, 108.4

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Ken Davis on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

98043852

REPORT OF RECEIPTS AND DISBURSEMENTS

Attachment 15

For Other Than An Authorized Committee
(Summary Page)

FEDERAL ELECTION COMMISSION

*** Post-Election Period**
OCTOBER 1ST 1996 THROUGH NOVEMBER 25TH 1996

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
DEMOCRATIC PARTY OF OKLAHOMA

ADDRESS (number and street) Check if different than previously reported
P.O. Box 25426

CITY, STATE and ZIP CODE
OKLAHOMA CITY, OK 73125

2. FEC IDENTIFICATION NUMBER
C00190934

3. This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report

- Monthly Report Due On:
- February 20
 - March 20
 - April 20
 - May 20
 - June 20
 - July 20
 - August 20
 - September 20
 - October 20
 - November 20
 - December 20
 - January 31

- Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- Thirtieth day report following the General Election on **Nov 5TH** in the State of **OKLAHOMA**

(b) Is this Report an Amendment? YES NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	OCTOBER 1, 1996 through NOVEMBER 25, 1996		
6. (a) Cash on Hand January 1, 19 96			\$ 30.49
(b) Cash on Hand at Beginning of Reporting Period		\$ (535.28)	
(c) Total Receipts (from Line 19)		\$ 143,982.51	\$ 267,224.69
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 143,447.23	\$ 267,255.08
7. Total Disbursements (from Line 30)		\$ 142,462.30	\$ 266,270.15
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 984.93	\$ 984.93
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ 4,411.91	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete. Assistant			
Type or Print Name of Treasurer		Patrick J. Hall	
Signature of Treasurer		<i>Patrick J. Hall</i>	
		Date JAN 6, 1997	

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

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RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

Post Office Box 25426 • Oklahoma City, OK 73125-0426
Phone: (405) 233-2700 • Fax: (405) 236-8009

FEB 10 9 09 AM '97



Mr. Kenneth A. Davis, Jr
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

February 4, 1997

Dear Kenneth:

In response to your recent inquiry on the October, 1996, Quarterly 3X Report for the Oklahoma Democratic Party, the ending cash balance for September 30th was, per the reconciled accounts of the Party, a negative balance of (\$535.28). This was due to an inadvertent overdraft in the account which was immediately corrected by additional deposits during the first few days of the month of October.

Therefore, the Party did not incur a debt or obligation in relation to this amount which should be reported on Line 8 of the Summary Page.

In addition, please find attached a "Memo Schedule A" from the Democratic National Committee which was inadvertently omitted from the 3X post-election report for the period ending November 25th. This Federal Express package contains the final report for 1996 for the period of November 26th through December 31st, as well

Please accept our apologies for some of the recent delays in reporting. At this time, the state and federal reports required of the Party are still being assembled and completed by hand. We are looking at various reporting software packages to automate the process, however, and want to have one in place soon.

I hope this additional information provides you with the clarifications you needed, but if not please don't hesitate to contact me.

Regards,


Patrick J. Hall, CAE
Assistant Treasurer

attachment

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III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

28043853856

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

F023
SEP 23 4 07 PM '97

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD REFERRAL: 97NF-25
DATE ACTIVATED: September 12, 1997

STAFF MEMBER: Tonda Phalen
Stephanie King

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Democratic Party of Oklahoma
and Christine Minyard, as Treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)(iii) and (iv)
11 CFR § 104.5(c)(1), (2)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Democratic Party of Oklahoma and its treasurer, Christine Minyard ("Respondents"), to the Office of the General Counsel on September 12, 1997. The basis for the RAD referral is the failure of the Respondents to timely file the 1995 Mid-Year Report, 1995 Year End Report and the 1996 30 Day Post-General Report

II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analysis, see Attachment 1, this Office recommends the Federal Election Commission ("the Commission") find reason to believe the respondents violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv)

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IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Democratic Party of Oklahoma and Christine Minyard, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv).
3. Enter into conciliation prior to a finding of probable cause to believe.
4. Approve the attached Factual and Legal Analysis.

- 5. Approve the attached Conciliation Agreement.
- 6. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

9/29/97
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments:

- 1. Factual and Legal Analysis
- 2. Proposed Conciliation Agreement

28043853858

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Democratic Party of Oklahoma)
and Christine Minyard, as treasurer.) RAD Referral MUR 4680
#97NF-25

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 3, 1997, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral #97NF-25:

1. Open a MUR.
2. Find reason to believe that the Democratic Party of Oklahoma and Christine Minyard, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv).
3. Enter into conciliation prior to a finding of probable cause to believe.
4. Approve the Factual and Legal Analysis, as recommended in the General Counsel's Report dated September 29, 1997.

(continued)

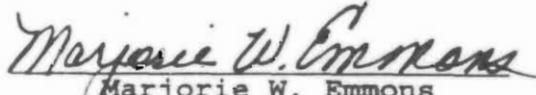
28043853859

5. Approve the Conciliation Agreement, as recommended in the General Counsel's Report dated September 29, 1997.
6. Approve the appropriate letters, as recommended in the General Counsel's Report dated September 29, 1997.

Commissioners Aikens, Elliott, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

10-3-97
Date


Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Mon., Sept. 29, 1997 4:07 p.m.
Circulated to the Commission: Tues., Sept. 30, 1997 11:00 a.m.
Deadline for vote: Fri., Oct. 03, 1997 4:00 p.m.

lrd

28043853850



FEDERAL ELECTION COMMISSION
Washington, DC 20463

October 9, 1997

Christine Minyard, Treasurer
Democratic Party of Oklahoma
P.O. Box 25426
Oklahoma City, OK 73125

RE: MUR 4680

Dear Ms. Minyard:

On October 3, 1997, the Federal Election Commission found that there is reason to believe the Democratic Party of Oklahoma ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath. In the absence of additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation, and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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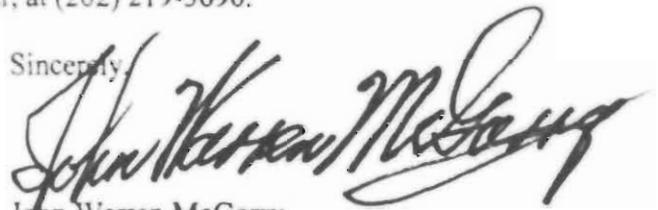
Christine Minyard
MUR 4680
Page 2

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Stephanie King, the paralegal assigned to this matter, at (202) 219-3690.

Sincerely,



John Warren McGarry
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

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**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

RESPONDENTS: Democratic Party of Oklahoma MUR: 4680
and Christine Minyard, as Treasurer

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. 437g(a)(2).

II. FACTUAL AND LEGAL ANALYSIS

A. The Law

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that all political committees other than authorized committees of a candidate file a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election. 2 U.S.C. § 434(a)(4)(A)(iii). In any non-election calendar year, a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31 and a report covering the period beginning July 1 and ending December 31, which shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv).

Pursuant to Section 434(a)(1), the treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of that subsection.

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B. The Facts

The Democratic Party of Oklahoma ("the Committee") is a political committee that is not an authorized committee of a candidate. Christine Minyard is the treasurer of this Committee.

The respondents were required to file the 1995 Mid-Year Report no later than July 31, 1995. Respondents were also required to file the 1995 Year-End Report no later than January 31, 1996. In addition, respondents were also required to file the 1996 30 Day Post-General Report no later than December 5, 1996. Respondents failed to timely file any of these reports. The 1995 Mid-Year Report, which disclosed \$30,465 in receipts and \$35,731 in disbursements, was not filed until October 6, 1995, 67 days late. The 1995 Year-End Report, which disclosed \$3,987 in receipts and \$5,199 in disbursements, was not filed until March 23, 1996, 52 days late. The 1996 30 Day Post-General Report, which disclosed \$143,982 in receipts and \$142,462 in disbursements, was not filed until January 14, 1997, 40 days late.

Prior notices were mailed to the committee informing it of the due dates for filing each of the reports at issue. Following each of the due dates, separate non-filer notices for each of the reports were mailed to the committee stating it failed to file the reports at issue and advising it to file the reports immediately. Although the committee was given prior notice of when to file reports, it continued to submit reports after their due dates during the 1995-1996 election cycle.

Therefore, there is reason to believe that the Democratic Party of Oklahoma and Christine Minyard, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv).

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Post Office Box 25426 • Oklahoma City, OK 73125-0426
Phone: (405) 239-2700 • Fax: (405) 236-8009

October 24, 1997

Federal Election Commission
Washington, D.C. 20463

ATTN: Stephanie King

Re: MUR4680

Dear Ms. King:

The Oklahoma Democratic Party is interested in expediting the resolution to this matter. As of this date the Party has:

- Taken corrective action to ensure a staff member and volunteer leader(s) have a reporting requirement to the Oklahoma Democratic Party (ODP) Executive Committee.
- Named the ODP Executive Director as Assistant Treasurer.

Sincerely,


PATRICK J. HALL
Assistant Treasurer

PJH JS

28042853805

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

-COPY-

1. (a) NAME OF COMMITTEE IN FULL <input type="checkbox"/> (Check if name is changed)		2. DATE
Democratic Party of Oklahoma		November 4, 1997
(b) Number and Street Address <input type="checkbox"/> (Check if address is changed)		3. FEC Identification Number
PO Box 25426		00190934
(c) City, State and ZIP Code		4. Is This Report An Amendment?
Oklahoma City, Oklahoma 73125		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

5. TYPE OF COMMITTEE (Check one)

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
 - (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|-------------------|-----------------------------|---------------|----------------|
| | | | |
- (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee (name of candidate)
 - (d) This committee is a _____ committee of the _____ Party (National, State or subordinate) (Democratic, Republican, etc.)
 - (e) This committee is a separate segregated fund
 - (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

Type of Connected Organization
 Corporation Corporation with Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position of the person in possession of committee books and records

Full Name <i>Patrick J. Hill</i>	Mailing Address <i>PO Box 25426 Oklahoma City, Oklahoma 73125</i>	Title or Position <i>Executive Director</i>
-------------------------------------	--	--

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee, and the name and address of any designated agent(s)

Full Name <i>Debbie Howe-Dawkins</i>	Mailing Address <i>5936 N. Suplee OKC, OK 73112</i>	Title or Position <i>Treasurer</i>
---	--	---------------------------------------

9. Bank or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds

Name of Bank, Depository, etc. <i>Bank First</i>	Mailing Address and ZIP Code <i>P.O. Box 26788 Oklahoma City, Oklahoma 73126</i>
---	---

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete

TYPE OR PRINT NAME OF TREASURER <i>Debbie Howe-Dawkins</i>	SIGNATURE OF TREASURER <i>Debbie Howe-Dawkins</i>	DATE <i>Nov. 4, 1997</i>
---	--	-----------------------------

NOTE: Such as to effect any will or intended information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS

For further information contact:
Federal Election Commission
Tel-free 800-424-9530
Local 202-215-3420

FEGAN033

FEC FORM 1
(revised 4/87)

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BEFORE THE FEDERAL ELECTION COMMISSION

DEC 5 10 20 AM '97

In the Matter of)
Democratic Party of Oklahoma and)
Debbie Hogue-Downing, as treasurer)

MUR 4680

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 3, 1997, the Commission found reason to believe that the Democratic Party of Oklahoma and Christine Minyard, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv) by failing to file disclosure reports in a timely manner. The Commission simultaneously entered into conciliation prior to a finding of probable cause to believe and approved a conciliation agreement containing a civil penalty

Subsequent to the Commission's reason to believe findings in this matter, the treasurer of the Democratic Party of Oklahoma changed from Christine Minyard to Debbi Hogue-Downing. The Respondents submitted an amended Statement of Organization reflecting this change on November 17, 1997

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II. RECOMMENDATIONS

- 1. Accept the attached conciliation agreement with Democratic Party of Oklahoma and Debbie Hogue-Downing, as treasurer.
- 2. Approve the appropriate letter.
- 3. Close the file.

Lawrence M. Noble
General Counsel

12/8/97
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachment:
1. Conciliation Agreement

Staff Assigned: Stephanie King
Tracey Ligon

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Democratic Party of Oklahoma and) MUR 4680
Debbie Hogue-Downing, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 11, 1997, the Commission decided by a vote of 5-0 to take the following actions in MUR 4680:

1. Accept the conciliation agreement with the Democratic Party of Oklahoma and Debbie Hogue-Downing, as treasurer, as recommended in the General Counsel's Report dated December 8, 1997.
2. Approve the appropriate letter, as recommended in the General Counsel's Report dated December 8, 1997.
3. Close the file.

Commissioners Aikens, Elliott, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

12-11-97
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., Dec. 09, 1997 10:18 a.m.
Circulated to the Commission: Tues., Dec. 09, 1997 11:00 a.m.
Deadline for vote: Fri., Dec. 12, 1997 4:00 p.m.

lrd

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

December 18, 1997

Debbie Hogue-Downing, Treasurer
Oklahoma Democratic Party
Post Office Box 25426
Oklahoma City, OK 73125

RE: MUR 4680

Dear Mrs. Hogue-Downing:

On December 11, 1997, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(iii) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Stephanie King
Stephanie King
Paralegal Specialist

Enclosure
Conciliation Agreement

9304285380

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Democratic Party of Oklahoma and) MUR 4680
Debbie Hogue-Downing, as Treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Democratic Party of Oklahoma and Christine Minyard, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The Democratic Party of Oklahoma ("Committee") is a political committee within the meaning of 2 U.S.C. § 431(4) and is not an authorized committee of any candidate.

Debbie Hogue-Downing is the treasurer of the Democratic Party of Oklahoma.

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3. The Federal Election Campaign Act of 1971, as amended ("the Act"), requires all political committees other than authorized committees of a candidate to file either quarterly or monthly reports. The relevant provisions for quarterly report filing are as follows. In a calendar year in which a regularly scheduled general election is held, post-general election reports must be filed no later than the 30th day after the general election and must be complete as of the 20th day after such general election, 2 U.S.C. § 434(a)(4)(A)(iii). In any other calendar year, reports covering the period beginning January 1 and ending June 30, must be filed no later than July 31, and reports covering the period beginning July 1 and ending December 31, must be filed no later than January 31, of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv). Pursuant to Section 434(a)(1), the treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of that subsection.

4. The respondents were required to file the 1995 Mid-Year Report no later than July 31, 1995. Respondents were also required to file the 1995 Year-End Report no later than January 31, 1996. In addition, respondents were required to file the 1996 Post-General Report no later than December 5, 1996.

5. On October 6, 1995, respondents filed their 1995 Mid-Year Report of Receipts and Disbursements, which disclosed \$30,465 in receipts and \$35,731 in disbursements. This report, which should have been filed on July 31, 1995, was 67 days late. On March 23, 1996, respondents filed their 1995 Year-End Report of receipts and disbursements, which disclosed \$3,987 in receipts and \$5,199 in disbursements. This report, which should have been filed on January 31, 1996, was 52 days late. On January 14, 1997, respondents filed their 1996 Post-General Report of receipts and disbursements, which disclosed \$143,982 in receipts and

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\$142,462 in disbursements. This report, which should have been filed on December 5, 1996, was disclosed 40 days late.

6. The Commission mailed prior notices to the respondents informing them of the due dates for filing each of the reports at issue. In addition, shortly following the passage of each of the due dates, the Commission mailed separate notices to the respondents for each of the reports advising that the respondents had failed to file the reports at issue and instructing the respondents to file the reports immediately.

V. The respondents failed to timely file the 1995 Mid-Year Report, the 1995 Year-End Report and the 1996 Post-General Report in violation of 2 U.S.C. § 434(a)(4)(A)(iii) and (iv).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of two thousand six hundred dollars (\$2,600), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: *[Signature]*
Lois G. Verner
Associate General Counsel

12-17-97
Date

FOR THE RESPONDENTS:

Debbie Hogue-Downing
(Name)
(Position) *Treasurer*

Nov. 13, 1997
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4680

DATE FILMED 1-12-98 CAMERA NO. 2

CAMERAMAN E.S.

280438538/5



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Date: 5/14/78

Microfilm

Press

THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED FILE 4680

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RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

JAN 12 11 45 AM '98

Post Office Box 25426 • Oklahoma City, OK 73125-0426
Phone: (405) 239-2700 • Fax: (405) 236-8009

January 9, 1998

Stephanie King
Federal Election Commission
Washington, DC 20463

Re MUR 4680

Dear Ms. King:

Enclosed you will find a check in the amount of \$2,600 payable to the Federal Election Commission that represents payment in full in accordance with the Conciliation Agreement agreed to by the Federal Election Commission and the Oklahoma Democratic Party.

With payment of this penalty, it is our understanding that this matter is now closed and no further response from the Oklahoma Democratic Party is required.

Sincerely,


PATRICK J. HALL
Executive Director

PJH:js

Enclosure

OKLAHOMA DEMOCRATIC PARTY

0913

STATE ACCOUNT
P.O. BOX 25426 PH 405-239-2708
OKLAHOMA CITY, OK 73125-1426

30-203/103C

1-5

18 98

PAY
TO THE
ORDER OF

Federal Election Comm

\$ 2,600

Two Thousand Six Hundred and no/100

DOLLARS

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNT(S)

Fine 1995				
MUR 4680				

Shirley Hooper - Downing
[Signature]

⑆000963⑆ ⑆103003632⑆ ⑆0400506702⑆

BancFirst.

P.O. Box 20708 Oklahoma City Oklahoma 73128
MEMBER FDIC (405) 270-1000

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File



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JAN 13 12:13 PM '98

January 13, 1998

TWO WAY MEMORANDUM

TO: OGC Docket
FROM: Rosa E. Swinton
Accounting Technician
SUBJECT: Account Determination for Funds Received

We recently received a check from **Oklahoma Democratic Party**, check number **0913**, dated **January 5, 1998**, for the amount of **\$2,600.00**. A copy of the check and any correspondence is being forwarded. Please indicate below which account the funds should be deposited and give the MUR/Case number and name associated with the deposit.

TO: Rosa E. Swinton *RES* Leslie D. Brown
Accounting Technician Disbursing Technician
FROM: OGC Docket
SUBJECT: Disposition of Funds Received

In reference to the above check in the amount of \$2,600.00 the MUR/Case number is 4680 and in the name of Oklahoma Demo Party. Place this deposit in the account indicated below:

- Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: _____

Frankie Hanger
Signature

January 13, 1998
Date

20004300351