



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

SECRETARIAT

2008 NOV -6 P 5:06

SENSITIVE

MEMORANDUM

November 6, 2008

TO: The Commission

THROUGH: Joseph F. Stoltz *JFS*
Acting Staff Director

FROM: John D. Gibson *JDG*
Chief Compliance Officer

Lynn M. Fraser *LMF*
Acting Director, ADR Office

SUBJECT: ADR 471 Oklahoma State Medical Association PAC and Dr. Johnny Roy,
Treasurer, Informational Memo on Assignment

Following a vote of the Commission on October 21, 2008, the Office of General Counsel transferred RAD Referral 07L-43. The ADR Office designated matter as ADR 471. We have included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 471 on November 12, 2008. Please contact Lynn Fraser if you have any questions or concerns before then. A copy of the referral is in the voting ballots folder.

Summary of Case: The Reports Analysis Division referred Oklahoma State Medical Association PAC and Dr. Johnny Roy, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2004 October Quarterly Report and their 2006 October Quarterly Report. Respondents filed an amended 2004 October Quarterly Report to disclose additional disbursements totaling \$142,318.18, and an amended 2006 October Quarterly Report to disclose additional disbursements totaling \$113,421.62. These amended reports were filed on May 3, 2007.

RAD also referred Respondents for failing to disclose all financial activity on their 2003 Mid Year Report. Respondents filed an amended 2003 Mid-Year Report to disclose additional disbursements in the amount of \$63,839.61. The statute of limitations expired for the 2003 Mid-Year Report, and thus this amendment will not be included in resolution of this matter.

29190281271

RAD also referred Respondents for failing to disclose all financial activity on their 2003 Mid Year Report. Respondents filed an amended 2003 Mid-Year Report to disclose additional disbursements in the amount of \$63,839.61. The statute of limitations expired for the 2003 Mid-Year Report, and thus this amendment will not be included in resolution of this matter.

Respondents contend that an internal audit in 2005 revealed that the Committee failed to disclose the transfer of funds to other political action committees and to its non-federal account as disbursements. The amendments were filed to correct the record.

29190281272