

REPORTS ANALYSIS DIVISION REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: December 3, 2015

ANALYST: Quy Vuong

I. COMMITTEE: Oklahoma Leadership Council
C00167213
Peter Hodges, Treasurer (9/14/15 - Present)
Anthony Ferate (6/20/10 - 9/13/15)
4031 N. Lincoln Boulevard
Oklahoma City, OK 73105

TYPE OF COMMITTEE: Party

II. REGISTRATION DATE: May 13, 1983

III. MULTICANDIDATE STATUS: Qualified

IV. BACKGROUND:

The Committee was sent twenty-two (22) Requests for Additional Information (RFAs) and three (3) Notices of Failure to File (RQ-7s) for reporting errors including failure to file reports and late filing, prohibited and other impermissible contributions or transfers, mathematical discrepancies, failure to provide supporting schedules, failure to properly itemize contributions from individuals, failure to properly itemize disbursements, Federal Election Activity/Levin Funds, and allocated federal and non-federal activity.

10-10-2015 10:10:10

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REPORTS ANALYSIS AUDIT REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

- I. COMMITTEE:** Oklahoma Leadership Council
C00167213
Peter Hodges, Treasurer (9/14/15 - Present)
Anthony Ferate (6/20/10 - 9/13/15)
4031 N. Lincoln Boulevard
Oklahoma City, OK 73105
- TYPE OF COMMITTEE:** Party
- II. REGISTRATION:** May 13, 1983
- III. MULTICANDIDATE STATUS:** Qualified
- IV. SUMMARY OF RFAI RESPONSES:** The Committee did not respond, responded inadequately or responded late to twenty (20) of twenty-five (25) RFAs and RQ-7s sent in the 2013-2014 election cycle.

OUTLINE-01-01-01

O Index
 Filings from: 1/1/2013 - 12/31/2014

Committee ID:	C00167213	Multi-Candidate Status/Date:	YES
Committee Name:	OKLAHOMA LEADERSHIP COUNCIL	Date Effective:	5/13/1983 12:00:00AM
Committee Designation:	UNAUTHORIZED	Committee Type:	QUALIFIED PARTY
Filing Frequency:	MONTHLY FILER	Treasurer Name:	HODGES, PETER LEO
Candidate ID:		Committee Address:	4031 N. LINCOLN BOULEVARD
Candidate Name:			OKLAHOMA CITY, OK 73105
Special Interest Group:	Not Available	Analyst Assigned:	Quy Vuong

Form Type	Report Type	Alt	Receipt Dt	Pgs	Begin Image #	Req Cvd Dt	End Cvd Dt	Ltr Mail Dt	Begin Cash	Rate	Disb	End Cash	Debit	Loans
MS-T			1/19/13	1	13960365378				0.00	0.00	0.00	0.00	0.00	0.00
MS-T			1/22/13	1	13940056302				0.00	0.00	0.00	0.00	0.00	0.00
F1A	A		7/30/13	4	13964461639				0.00	0.00	0.00	0.00	0.00	0.00
MS-T			6/9/14	1	14961239824				0.00	0.00	0.00	0.00	0.00	0.00
MS-T			8/18/14	6	14031284619				0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M2	N	2/20/13	26	13961057533	1/1/13	1/31/13		57,755.94	31,242.75	18,531.37	70,467.32	0.00	0.00
F3XA	M2	A	10/1/13	19	13941676162	1/1/13	1/31/13		57,755.94	26,452.75	18,531.37	67,677.32	0.00	0.00
RFAL	RO-2-M2	N		3	13330033849	1/1/13	1/31/13	6/26/13	0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M3	N	3/20/13	22	13961192083	2/1/13	2/28/13		197,762.51	34,324.22	14,202.76	217,883.97	0.00	0.00
F3XA	M3	A	10/1/13	20	13941676181	2/1/13	2/28/13	6/26/13	67,677.32	31,699.22	14,202.76	85,173.78	0.00	0.00
RFAL	RO-2-M3	N		4	13330033852	3/1/13	3/31/13		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M4	N	7/22/13	23	13964434849	3/1/13	3/31/13		217,883.97	27,591.31	51,160.07	194,315.21	0.00	0.00
F3XA	M4	A	7/22/13	24	13964434872	3/1/13	3/31/13		217,883.97	27,591.31	51,160.07	194,315.21	0.00	0.00
F3XA	M4	A	10/2/13	20	13941676349	3/1/13	3/31/13	9/18/13	85,173.78	25,683.06	51,160.07	59,696.77	0.00	0.00
RFAL	RO-2-M4	A		2	13330038915	3/1/13	3/31/13		0.00	0.00	0.00	0.00	0.00	0.00
RFAL	RO-7-M4			2	13330031340	3/1/13	3/31/13	5/6/13	0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M5	N	7/22/13	16	13964434896	4/1/13	4/30/13		194,315.21	36,755.25	0.00	231,070.46	0.00	0.00
F3XA	M5	A	7/30/13	34	13964461180	4/1/13	4/30/13		194,315.21	36,755.25	0.00	231,070.46	0.00	0.00
F3XA	M5	A	10/2/13	29	13941676370	4/1/13	4/30/13	9/18/13	59,696.77	30,248.00	41,549.52	48,395.25	0.00	0.00
RFAL	RO-2-M5	A		2	13330038917	4/1/13	4/30/13		0.00	0.00	0.00	0.00	0.00	0.00
RFAL	RO-7-M5			2	13330033094	4/1/13	4/30/13	6/5/13	0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M6	N	7/24/13	9	13941266883	5/1/13	5/31/13		231,070.46	4,470.00	0.00	235,540.46	0.00	0.00
F3XA	M6	A	7/30/13	19	13964461297	5/1/13	5/31/13		189,455.94	4,470.00	14,677.34	179,248.60	0.00	0.00
F3XA	M6	A	10/2/13	12	13941676406	5/1/13	5/31/13	9/23/13	48,395.25	3,510.00	14,677.34	37,227.91	0.00	0.00
RFAL	RO-2-M6	A		2	13330039145	5/1/13	5/31/13		0.00	0.00	0.00	0.00	0.00	0.00
RFAL	RO-7-M6			2	13330034303	5/1/13	5/31/13	7/10/13	0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M7	N	7/26/13	47	13964446933	6/1/13	6/30/13		235,540.00	55,100.25	28,653.60	227,986.65	2,372.46	0.00
F3XA	M7	A	10/2/13	75	13941676418	6/1/13	6/30/13		37,227.91	2,108.25	27,320.27	12,015.89	0.00	0.00
F3XA	M7	A	10/20/13	49	13964823930	6/1/13	6/30/13		37,227.91	42,300.25	25,715.58	19,812.58	6,048.35	0.00
F3XN	M8	N	8/21/13	60	13964565676	7/1/13	7/31/13		0.00	37,735.69	42,496.54	-16,760.85	4,903.04	0.00

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Form Type	Report Type	AV	Receipt Dt	Pgs	Begin Image #	Begin Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debit	Loans
F3XA	M8	A	9/18/13	64	13941585265	7/1/13	7/31/13		227,986.65	30,774.52	40,756.94	206,004.23	5,198.14	0.00
F3XA	M8	A	10/21/13	129	13941676463	7/1/13	7/31/13		12,015.89	11,145.50	40,882.66	-17,521.27	0.00	0.00
F3XN	M9	N	9/18/13	52	13941595724	8/1/13	8/31/13		206,004.23	20,568.00	32,313.03	194,259.20	7,422.89	0.00
F3XA	M9	A	10/21/13	95	13941676622	8/1/13	8/31/13		-17,521.27	12,439.25	31,568.35	-36,650.37	0.00	0.00
F3XA	M9	A	6/9/14	95	14941287510	8/1/13	8/31/13		-17,521.27	12,439.25	31,568.35	-36,650.37	0.00	0.00
RFAI	RO-2-M9	A		3	14330051330	8/1/13	8/31/13		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M10	N	10/20/13	63	13864824027	9/1/13	9/30/13		7,619.98	32,416.25	24,475.31	15,560.92	2,223.65	0.00
RFAI	RO-2-M10	N		3	14330052106	9/1/13	9/30/13		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M11	N	11/21/13	27	13942585046	10/1/13	10/31/13		15,560.92	10,542.00	23,547.75	2,555.17	2,518.70	0.00
RFAI	RO-2-M11	N		2	14330052109	10/1/13	10/31/13		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M12	N	12/20/13	18	13964942139	11/1/13	11/30/13		2,555.17	8,769.50	3,013.39	8,311.28	2,767.88	0.00
RFAI	RO-2-M12	N		2	14330052111	11/1/13	11/30/13		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	YE	N	1/30/14	28	14940176526	12/1/13	12/31/13		2,555.17	23,768.75	19,374.22	6,949.70	4,903.25	0.00
RFAI	RO-2-YE	N		3	14330052113	12/1/13	12/31/13		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M2	N	2/20/14	21	14960479435	1/1/14	1/31/14		6,949.70	17,638.25	25,962.96	-1,375.01	0.00	0.00
RFAI	RO-2-M2	N		5	14330054857	1/1/14	1/31/14		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M3	N	3/20/14	14	14960553492	2/1/14	2/28/14		-1,375.01	21,927.75	32,415.34	-11,862.60	0.00	0.00
RFAI	RO-2-M3	N		3	14330054862	2/1/14	2/28/14		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M4	N	4/20/14	21	14960858430	3/1/14	3/31/14		-11,862.60	22,762.04	21,751.96	-10,852.52	0.00	0.00
RFAI	RO-2-M4	N		3	14330054865	3/1/14	3/31/14		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M5	N	5/20/14	32	14961197397	4/1/14	4/30/14		-10,852.52	35,288.51	35,801.85	-11,365.86	0.00	0.00
RFAI	RO-2-M5	N		2	14330059209	4/1/14	4/30/14		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M6	N	6/20/14	27	14941613386	5/1/14	5/31/14		-11,365.86	28,941.75	30,358.32	-12,780.43	0.00	0.00
RFAI	RO-2-M6	N		2	14330059846	5/1/14	5/31/14		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M7	N	7/20/14	23	14961686128	6/1/14	6/30/14		-12,780.43	40,372.43	31,759.03	-4,167.03	0.00	0.00
RFAI	RO-2-M7	N		2	14330062355	6/1/14	6/30/14		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M8	N	8/20/14	43	14970726492	7/1/14	7/31/14		-4,167.03	47,380.17	55,594.33	-12,381.19	0.00	0.00
RFAI	RO-2-M8	N		2	14330062461	7/1/14	7/31/14		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M9	N	9/20/14	28	14970891242	8/1/14	8/31/14		-12,381.19	38,463.49	33,439.79	-7,357.49	0.00	0.00
RFAI	RO-2-M9	N		30	50806900803	8/1/14	8/31/14		-12,381.19	38,463.49	33,439.79	-7,357.49	0.00	0.00
F3XA	M9	A	8/6/15	30	14330071017	8/1/14	8/31/14		0.00	0.00	0.00	0.00	0.00	0.00
RFAI	RO-2-M9	N		2	14330071017	8/1/14	8/31/14		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	M10	N	10/20/14	35	14951866280	9/1/14	9/30/14		-7,357.49	65,340.67	27,913.88	30,069.30	0.00	0.00
RFAI	RO-2-M10	N		3	15330075729	9/1/14	9/30/14		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	12G	N	10/23/14	26	14952543972	10/1/14	10/15/14		30,069.30	30,692.90	46,227.86	14,534.34	0.00	0.00
RFAI	RO-2-12G	N		2	15330075732	10/1/14	10/15/14		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	30G	N	12/9/14	45	14953196172	10/16/14	11/24/14		14,534.34	84,884.45	56,884.93	42,533.86	0.00	0.00
F3XA	30G	A	4/21/15	45	15970675043	10/16/14	11/24/14		14,534.34	84,884.45	56,884.93	42,533.86	0.00	0.00
F3XA	30G	A	8/6/15	47	50806900803	10/16/14	11/24/14		14,534.34	84,884.45	56,884.93	42,533.86	0.00	0.00
RFAI	RO-2-30G	N		3	15330078687	10/16/14	11/24/14		0.00	0.00	0.00	0.00	0.00	0.00
F3XN	YE	N	2/5/15	31	15950800143	11/25/14	12/31/14		42,533.86	15,563.42	59,143.65	-1,046.37	0.00	0.00
RFAI	RO-2-YE	N		2	15330081304	11/25/14	12/31/14		0.00	0.00	0.00	0.00	0.00	0.00
Final Report's Total									725,230.36	768,081.71	0.00	0.00	0.00	0.00

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Oklahoma Leadership Council (C00167213)
ADRO Referral Response Guide

Failure to File Reports and Late Filing

Report	RFAD Due Date	Response Date(s)	Code	Reason for code
2013 M4	N/A	N/A	N/A	The Committee failed to timely file the 2013 M4. The Committee filed 2013 the M4 on 7/22/13, 93 days late.
2013 M5	N/A	N/A	N/A	The Committee failed to timely file the 2013 M5. The Committee filed the 2013 M5 on 7/22/13, 63 days late.
2013 M6	N/A	N/A	N/A	The Committee failed to timely file the 2013 M6. The Committee filed the 2013 M6 on 7/24/13, 34 days late.

Prohibited and Other Impermissible Contributions or Transfers

Report	RFAD Due Date	Response Date(s)	Code	Reason for code
2014 M2	8/20/14	N/A	NR	Schedule A supporting Line 11(c) disclosed the receipt of apparent prohibited contributions from six (6) unregistered political organizations totaling \$10,000.00, or 100% of the total contributions from other federal political committees. To date, the Committee has not taken corrective action or provided further clarification.

Mathematical Discrepancies

Report	RFAD Due Date	Response Date(s)	Code	Reason for code
2013 M3	7/31/13	10/1/13	LAR	The Committee's report contained mathematical discrepancies totaling \$317,075.88, as detailed below: The beginning cash balance, \$197,762.51, was greater than the ending cash balance of the previous report, \$70,467.32, a discrepancy of \$127,295.19. The report contained mathematical discrepancies on several lines in Column B totaling \$49,774.12. Line 6(a) of the Summary Page, \$197,762.51, represented the total cash-on-hand as of January 1, 2013, was greater than the figure disclosed on Line 6(a) of the previous report, \$57,755.94, a discrepancy of \$140,006.57. The Committee filed an Amended 2013 M3 on 10/1/13, correcting these discrepancies.

14-00000-01-01-01

Amended 2013 M9, received 10/2/13	6/9/14	6/9/14	IR	<p>Schedule B supporting Line 21(b) contained activity outside of the reporting period totaling \$2,259.02.</p> <p>The Committee filed a Form 99 on 6/9/14, stating in part: "The Commission requested clarification regarding activity outside of the coverage dates. All transactions disclosed in this report fall within the coverage dates or are memo entries."</p>
2013 M10	9/2/14	N/A	NR	<p>The Committee's report contained mathematical discrepancies totaling \$174,657.19, as detailed below:</p> <p>The beginning cash balance, \$7,619.98, was greater than the ending cash balance of the previous report, -\$36,650.37, a discrepancy of \$44,270.35.</p> <p>Line 8, Column A, \$15,560.92, of the Summary Page did not equal Line 8, Column B, \$123,828.51, of the Summary Page, a discrepancy of \$108,267.59.</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$22,119.25.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2013 M11	9/2/14	N/A	NR	<p>The Committee's report contained mathematical discrepancies totaling \$200,126.59, as detailed below:</p> <p>Line 8, Column A, \$2,555.17, of the Summary Page did not equal Line 8, Column B, \$113,033.68, of the Summary Page, a discrepancy of \$110,478.51.</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$89,648.08.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2013 M12	9/2/14	N/A	NR	<p>The Committee's report contained mathematical discrepancies totaling \$205,447.17, as detailed below:</p> <p>Line 8, Column A, \$8,311.28, of the Summary Page did not equal Line 8, Column B, \$126,315.59, of the Summary Page, a discrepancy of \$118,004.31.</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$87,442.86.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>

DUPLICATE

2013 YE	9/2/14	N/A	NR	<p>The Committee's report contained mathematical discrepancies totaling \$222,053.69, as detailed below:</p> <p>The beginning cash balance, \$2,555.17, was less than the ending cash balance of the previous report, \$8,311.28, a discrepancy of \$5,756.11.</p> <p>Line 8, Column A, \$6,949.70, of the Summary Page did not equal Line 8, Column B, \$113,857.55, of the Summary Page, a discrepancy of \$106,907.85.</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$109,389.73.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
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Failure to Provide Supporting Schedules

Report	RFAT Due Date	Response Date(s)	Code	Reason for code
2013 M3	7/31/13	10/1/13	LIR	<p>Schedule A supporting Line 11(a)(i) disclosed an unitemized lump sum receipt of \$7,652.66. However, the Committee failed to clarify whether this amount includes any receipts aggregating greater than \$200 from an individual in the calendar year.</p> <p>The Committee filed an Amended 2013 M3 on 10/1/13, but failed to clarify this unitemized lump sum.</p>
Amended 2013 M5, received 7/30/13	12/3/13	10/2/13	IR	<p>The Committee's report disclosed additional disbursements totaling \$41,549.52 on Schedule H4 supporting Line 21(a), resulting in an increase of more than 5% and \$10,000.00 over the original report.</p> <p>The Committee filed an Amended 2013 M5 on 10/2/13, but failed to clarify why the activity was not disclosed on the original report.</p>
Amended 2013 M6, received 7/30/13	12/3/13	10/2/13	IR	<p>The Committee's report disclosed additional disbursements totaling \$14,677.34 on Schedule H4 supporting Line 21(a), resulting in an increase of more than 5% and \$10,000.00 over the original report.</p> <p>The Committee filed an Amended 2013 M6 on 10/2/13, but failed to clarify why the activity was not disclosed on the original report.</p>
2013 M10	9/2/14	N/A	NR	<p>Schedule D supporting Line 10 disclosed eight (8) debts owed by the Committee with outstanding beginning balances. However, Schedule D of the previous report disclosed no outstanding ending balances at the close of the period, resulting in a missing schedule of \$7,023.12.</p> <p>Schedule D supporting Line 9 disclosed three (3) debts owed to the Committee with outstanding beginning balances. However, Schedule D of the previous report disclosed no outstanding ending balances at the close of the period, resulting in a missing schedule of \$399.77.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>

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2013 YE	9/2/14	N/A	NR	<p>Schedule D supporting Line 10 disclosed two (2) debts owed by the Committee with outstanding beginning balances. However, Schedule D of the previous report disclosed no outstanding ending balances at the close of the period, resulting in a missing schedule of \$2,495.93.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2014 M2	8/20/14	N/A	NR	<p>The report disclosed a negative cash-on-hand balance totaling \$1,375.01 for the reporting period.</p> <p>Schedule D supporting Line 10 of the previous report disclosed nine (9) debts totaling \$4,403.48 with outstanding ending balances; however, these debts were omitted from this report.</p> <p>Schedule D supporting Line 9 of the previous report disclosed four (4) debts totaling \$499.77 with outstanding ending balances; however, these debts were omitted from this report.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2014 M3	8/20/14	N/A	NR	<p>The report disclosed a negative cash-on-hand balance totaling \$11,862.60 for the reporting period.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2014 M4	8/20/14	N/A	NR	<p>The report disclosed a negative cash-on-hand balance totaling \$10,852.52 for the reporting period.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2014 M5	9/15/14	N/A	NR	<p>The report disclosed a negative cash-on-hand balance totaling \$11,365.86 for the reporting period.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2014 M6	9/29/14	N/A	NR	<p>The report disclosed a negative cash-on-hand balance totaling \$12,780.43 for the reporting period.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2014 M7	11/18/14	N/A	NR	<p>The report disclosed a negative cash-on-hand balance totaling \$4,167.03 for the reporting period.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>

10-10-2014

2014 M8	11/19/14	N/A	NR	<p>The report disclosed a negative cash-on-hand balance totaling \$12,381.19 for the reporting period.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2014 YE	6/1/15	N/A	NR	<p>The report disclosed a negative cash-on-hand balance totaling \$1,046.37 for the reporting period.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>

Failure to Properly Itemize Contributions from Individuals

Report	RFAD Due Date	Response Date(s)	Code	Reason for code
Amended 2013 M9, received 10/2/13	6/9/14	4/21/15	LAR	<p>Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 12 of 19, or 63.2%, of the contributions from individuals that require itemization.</p> <p>The Committee filed a Form 99 on 6/9/14, stating in part: "The Commission requested that our Committee amend our report to provide missing contributor information or demonstrate best efforts. Our Committee has requested missing information from all individuals who have contributed over \$200 in a calendar year. Our Committee has amended our report to note that this information was requested."</p> <p>The Committee filed a Form 99 on 4/21/15, stating in part: "First, the Commission requested additional information regarding the employers and occupations of several donors. Additional information, where available, has been provided on an Amended Report. In addition, the following paragraphs outline the best efforts procedures of Oklahoma Leadership Council (C00167213). The Committee believes its best efforts procedures are in compliance with the best efforts and donor identification provisions of Commission regulations. As an initial matter, all Committee solicitations request the donor's first name, middle initial, last name, and mailing address; notify the donor that the Committee is required by federal law to report occupation and employer information; and request that the donor provide such information. The Committee reports all information as it is provided by the donors. For those donors who choose not to provide the occupation and employer information, the Committee sends the required follow-up letter or e-mail, which asks the donor again to provide the information, and again advises the donor of the Committee's obligation under federal law to report the information. These follow up letters or e-mails do not request any additional contributions from the donor. All such information received is reported. Any additional information received subsequent to the filing of the original reports will be included on amendments to be filed by the Committee."</p>
2013 M10	9/2/14	4/21/15	LAR	<p>Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 23 of 43, or 53.5%, of the contributions from individuals that require itemization.</p>

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				<p>The Committee filed a Form 99 on 4/21/15, stating in part: "First, the Commission requested additional information regarding the employers and occupations of several donors. Additional information, where available, has been provided on an Amended Report. In addition, the following paragraphs outline the best efforts procedures of Oklahoma Leadership Council (C00167213). The Committee believes its best efforts procedures are in compliance with the best efforts and donor identification provisions of Commission regulations. As an initial matter, all Committee solicitations request the donor's first name, middle initial, last name, and mailing address; notify the donor that the Committee is required by federal law to report occupation and employer information; and request that the donor provide such information. The Committee reports all information as it is provided by the donors. For those donors who choose not to provide the occupation and employer information, the Committee sends the required follow-up letter or e-mail, which asks the donor again to provide the information, and again advises the donor of the Committee's obligation under federal law to report the information. These follow up letters or e-mails do not request any additional contributions from the donor. All such information received is reported. Any additional information received subsequent to the filing of the original reports will be included on amendments to be filed by the Committee."</p>
2014 M2	8/20/14	4/21/15	LAR	<p>Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 13 of 18, or 72.2%, of the contributions from individuals that require itemization.</p> <p>The Committee filed a Form 99 on 4/21/15, stating in part: "First, the Commission requested additional information regarding the employers and occupations of several donors. Additional information, where available, has been provided on an Amended Report. In addition, the following paragraphs outline the best efforts procedures of Oklahoma Leadership Council (C00167213). The Committee believes its best efforts procedures are in compliance with the best efforts and donor identification provisions of Commission regulations. As an initial matter, all Committee solicitations request the donor's first name, middle initial, last name, and mailing address; notify the donor that the Committee is required by federal law to report occupation and employer information; and request that the donor provide such information. The Committee reports all information as it is provided by the donors. For those donors who choose not to provide the occupation and employer information, the Committee sends the required follow-up letter or e-mail, which asks the donor again to provide the information, and again advises the donor of the Committee's obligation under federal law to report the information. These follow up letters or e-mails do not request any additional contributions from the donor. All such information received is reported. Any additional information received subsequent to the filing of the original reports will be included on amendments to be filed by the Committee."</p>
2014 30G	4/20/15	4/21/15	LAR	<p>Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 16 of 57, or 28.1%, of the contributions from individuals that require itemization.</p> <p>The Committee filed a Form 99 on 4/21/15, stating in part: "First, the Commission requested additional information regarding the employers and occupations of several donors. Additional information, where available, has been provided on an Amended Report. In addition, the following paragraphs</p>

				<p>outline the best efforts procedures of Oklahoma Leadership Council (C00167213). The Committee believes its best efforts procedures are in compliance with the best efforts and donor identification provisions of Commission regulations. As an initial matter, all Committee solicitations request the donor's first name, middle initial, last name, and mailing address; notify the donor that the Committee is required by federal law to report occupation and employer information; and request that the donor provide such information. The Committee reports all information as it is provided by the donors. For those donors who choose not to provide the occupation and employer information, the Committee sends the required follow-up letter or e-mail, which asks the donor again to provide the information, and again advises the donor of the Committee's obligation under federal law to report the information. These follow up letters or e-mails do not request any additional contributions from the donor. All such information received is reported. Any additional information received subsequent to the filing of the original reports will be included on amendments to be filed by the Committee."</p>
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Failure to Properly Itemize Disbursements

Report	RF/Al Due Date	Response Date(s)	Code	Reason for code
2013 YE	9/2/14	N/A	NR	<p>Schedule B supporting Line 21(b) failed to disclose an adequate purpose of disbursement to thirteen (13) of thirty-four (34) vendors, or 38.2%.</p> <p>Schedule B supporting Line 21(b) failed to disclose the purpose for one (1) of thirty-four (34) disbursements, or 2.9%.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2014 M3	8/20/14	N/A	NR	<p>Schedule B supporting Line 21(b) failed to disclose the name and address of the original vendors for one (1) disbursement totaling \$13,164.68.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>

Federal Election Activity/Levin Funds

Report	RF/Al Due Date	Response Date(s)	Code	Reason for code
2013 M3	7/31/13	10/1/13	LAR	<p>The Schedule L Aggregation Page for Levin Funds disclosed a beginning cash balance, \$32,246.84, which was greater than the ending Levin cash balance on the previous report, \$21,556.96, a discrepancy of \$10,689.88.</p> <p>Line 7, Column B of the Schedule L Aggregation Page for Levin Funds, \$32,246.84, represented the total cash-on-hand as of January 1, 2013, was greater than the figure disclosed on Line 7, Column B of the previous report, \$16,556.96, a discrepancy of \$15,689.88.</p> <p>The Schedule L Aggregation Page for Levin Funds contained mathematical discrepancies totaling \$5,000.00.</p>

				The Committee filed an Amended 2013 M3 on 10/1/13, correcting these discrepancies.
2014 M10	3/26/15	4/10/15	LAR	<p>The Committee disclosed disbursements totaling \$116,948.00 for a 3-month period; however, Schedule B for Line 30(b) failed to disclose payments for salary or wages as Federal Election Activity.</p> <p>The Committee filed a Form 99 on 4/10/15, stating in part: "First, the Commission requested clarification regarding a lack of payments for salary or wages on Schedule B supporting Line 30(b). The Committee discloses its payments for Payroll and Payroll Taxes/Fees on Schedule H4 since the employees spent 25% or less of their time during the months referenced on FEA or activities in connection with a Federal Election."</p>

Allocated Federal and Non-Federal Activity

Report	RFAD Due Date	Response Date(s)	Code	Reason for code
2013 M2	7/31/13	10/1/13	LIR	<p>The Committee failed to provide a Schedule H1 to disclose the allocation ratio for administrative expenditures on Schedule H4.</p> <p>Schedule H4 failed to disclose the mailing address for \$1,325.08 in disbursements.</p> <p>Schedule H4 disclosed \$2,521.00 in reimbursements to individuals; however, only \$968.00 in corresponding memo entries were disclosed.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2013 M3	7/31/13	10/1/13	LAR	<p>The Committee failed to provide a Schedule H2 to disclose the allocation ratio and unique activity or event identifier for fundraising expenditures listed on Schedule H4.</p> <p>Schedule H4 disclosed an event year-to-date total for administrative expenses of \$10,053.33; however, FEC calculations disclose this total to be \$23,584.70, resulting in a discrepancy of \$13,351.37.</p> <p>The Committee filed an Amended 2013 M3 on 10/1/13, correcting these discrepancies.</p>
			LIR	<p>Schedule H4 failed to disclose an adequate purpose of disbursement to one (1) vendor totaling \$561.56.</p> <p>Schedule H4 failed to disclose the mailing address for \$500.00 in disbursements.</p> <p>The Committee filed an Amended 2013 M3 on 10/1/13, failing to correct these issues.</p>
Amended 2013 M4, received 7/22/13	12/3/13	10/2/13	IR	<p>Schedule H4 failed to disclose the mailing address for \$26,425.95 in disbursements.</p> <p>The Committee filed an Amended 2013 M4 on 10/2/13, failing to correct</p>

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				these issues.
2014 M3	8/20/14	N/A	NR	<p>The Committee failed to provide a Schedule H1 to disclose the allocation ratio for administrative expenditures on Schedule H4.</p> <p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$14,949.51.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2014 M4	8/20/14	N/A	NR	<p>Line 18(a) of the Detailed Summary Page disclosed \$41,786.04 in transfers from the non-federal account for allocable administrative activity for a 3 month period. However, Line 21(a)(ii) disclosed \$31,325.68 in the non-federal share of allocable administrative disbursements, resulting in an apparent excessive transfer of approximately \$1,960.36 from the non-federal account.</p> <p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$14,249.93.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2014 M5	9/15/14	N/A	NR	<p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$14,467.82.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2014 M6	9/29/14	N/A	NR	<p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$16,054.84.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2014 M7	11/18/14	N/A	NR	<p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$16,954.32.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>
2014 M8	11/19/14	N/A	NR	<p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$16,886.09.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>

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2014 M10	3/26/15	4/10/15	LAR	<p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$9,879.04.</p> <p>The Committee filed a Form 99 on 4/10/15, stating in part: "Second, regarding payments for Payroll and Payroll Taxes/Fees on Schedule H4 supporting Line 21(a) of our report. This activity is for employees who spent 25% or less of their time during the month referenced above on FEA or activities in connection with a Federal Election."</p>
2014 12G	3/26/15	4/10/15	LAR	<p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$21,174.13.</p> <p>The Committee filed a form 99 on 4/10/15, stating in part: "The Commission requested additional information regarding payments for Payroll and Payroll Taxes/Fees on Schedule H4 supporting Line 21(a) of our report. This activity is for employees who spent 25% or less of their time during the month referenced above on FEA or activities in connection with a Federal Election."</p>
2014 30G	4/20/15	4/21/15	LAR	<p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$20,863.99.</p> <p>The Committee filed a Form 99 on 4/21/15, stating in part: "Second, regarding payments for Payroll and Payroll Taxes/Fees on Schedule H4 supporting Line 21(a) of our report. This activity is for employees who spent 25% or less of their time during the month referenced above on FEA or activities in connection with a Federal Election."</p>
2014 YE	6/1/15	N/A	NR	<p>Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting in an apparent impermissible transfer-in from the non-federal account of \$22,148.56.</p> <p>To date, the Committee has not taken corrective action or provided further clarification.</p>

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