



2015 DEC 18 AM 8:41

Federal Election Commission  
Washington, DC 20463

**SENSITIVE**

**MEMORANDUM**

December 17, 2015

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Lynn M. Fraser *LF*  
Director, ADR Office

BY: Krista J. Roche *KJR*  
Assistant Director, ADR Office

SUBJECT: ADR 791 Oklahoma Leadership Council and Peter Hodges,  
Treasurer, Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 15L-48 for processing on December 3, 2015, and the ADR Office designated the referral ADR 791. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 791 on December 22, 2015. Please contact Krista Roche if you have any questions or concerns before then.

**Summary of Case:** RAD referred Oklahoma Leadership Council and Peter Hodges, Treasurer (Respondents or the Committee) for a series of reporting errors and other FECA violations during the 2013-2014 election cycle. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. The Committee's errors included, among other items: 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.

11-10-2014