

RECEIVED
FEDERAL ELECTION COMMISSION
MAY 2, 2024 2:14 PM
OFFICE OF GENERAL COUNSEL

May 2, 2024

Via email: EnfComplaint@fec.gov

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

MUR 8255

To Whom It May Concern:

Enclosed is a summary and detail file containing questionable "fundraising" expenses incurred by the "Lucas for Congress" campaign of US Representative Frank Lucas. The data source for these files is the FEC database.

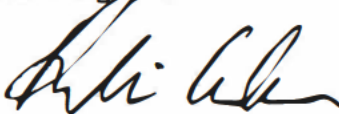
The expenses were incurred from 2012 through 2023 in December of each year for "fundraising" efforts in Las Vegas during the annual National Finals Rodeo. There are no noticeable increases in donations in the days and weeks following the rodeo and appear to be more of a personal nature for Mr. Lucas given his family's ranching business. I have not included any related airfare as the purpose of all Mr. Lucas' purchases of airline tickets is not documented.

The hard-working people of Oklahoma deserve answers with these questionable fundraising efforts.

Please contact me at your convenience at [REDACTED] with any questions or concerns with this complaint.

Thank you in advance for your prompt attention to this matter.

Kindest Regards



Robin Carder, CPA_(inactive), MBA, MLS

I, Robin Lynn Carder, make this complaint and under the penalty of perjury state the following:

1. I am 57 years old. My date of birth is [REDACTED]. I am a citizen of Oklahoma.
2. My address is [REDACTED], Sand Springs, OK 74063.
3. I have lived in Oklahoma my entire life except for a short time after birth and 14 months between 1993-1994.
4. I am of sound mind and am not under the influence of any alcohol or drugs, legal or otherwise.
5. I have a BBA in Accounting from Oklahoma State University, an MBA with a concentration in Finance from Oklahoma State University and a Master of Legal Studies in Health Care Law from the University of Oklahoma School of Law. I am also a Certified Public Accountant with an inactive license, #14171, in the State of Oklahoma.
6. I am currently running for Congress in Oklahoma Congressional District 3.
7. I have analyzed the FEC disbursement data of the "Lucas for Congress" campaign and have discovered questionable fundraising expenditures related to "fundraising" excursions to Las Vegas in December of each year from 2012 through 2023.
8. To the best of my knowledge, the information contained in the accompanying complaint is truthful and accurate.

By: Robin Lynn Carder

Signature: *[Handwritten Signature]*

Date: 5/2/2024

Notary Name: *Hailee Finch*
Subscribed and sworn to before me
this 2nd day of May 2024

Oct. 23rd 2027
Commission # Expires Notary Public *[Handwritten Signature]*



Complaint Background, Filed with FEC, 5/2/2024
 Lucas For Congress (C00287912)
 Fundraising Expenses - Las Vegas
 December, 2012-2023

Category/Vendor	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	TOTAL
Hotel	\$ 2,042.04	\$ 949.20	\$ 3,417.55	\$ 3,652.27	\$ 3,062.36	\$ 3,000.00	\$ 3,414.70	\$ 2,031.75	\$ 3,402.69	\$ -	\$ 4,885.05	\$ 4,738.96	\$ 12,220.64	\$ 46,817.21
Four Seasons Hotel	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,738.96	\$ -	\$ 4,738.96
MGM Grand	\$ 2,042.04	\$ 949.20	\$ 375.20	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,366.44
Venetian/Palazzo	\$ -	\$ -	\$ 3,042.35	\$ 3,652.27	\$ 3,062.36	\$ -	\$ -	\$ 2,031.75	\$ -	\$ -	\$ 4,885.05	\$ -	\$ -	\$ 16,673.78
Wynn	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,000.00	\$ 3,414.70	\$ -	\$ 3,402.69	\$ -	\$ -	\$ -	\$ 12,220.64	\$ 22,038.03
Limo/Shuttle	\$ -	\$ -	\$ -	\$ -	\$ 436.44	\$ 1,311.22	\$ 2,832.39	\$ 2,860.20	\$ -	\$ -	\$ -	\$ -	\$ 2,254.96	\$ 9,695.21
AWG Ambassador	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,832.39	\$ 2,860.20	\$ -	\$ -	\$ -	\$ -	\$ 2,254.96	\$ 7,947.55
ODS Transportation	\$ -	\$ -	\$ -	\$ -	\$ 436.44	\$ 1,311.22	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,747.66
Meals	\$ 1,047.55	\$ 1,369.33	\$ 583.44	\$ 450.00	\$ 5,726.27	\$ 3,617.82	\$ 3,272.95	\$ 321.27	\$ -	\$ -	\$ 268.26	\$ 1,076.97	\$ 803.53	\$ 18,537.39
4 Queens	\$ -	\$ -	\$ 300.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 300.00
Binion's	\$ -	\$ 348.55	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 348.55
Fleur Mandalay Bay	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 273.44	\$ -	\$ 273.44
Lacave at Wynn	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,257.82	\$ 3,196.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,453.82
Lakeside Grill	\$ -	\$ -	\$ -	\$ -	\$ 5,486.27	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,486.27
MGM Grand	\$ 1,047.55	\$ 113.83	\$ -	\$ 450.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,611.38
Morel's French Steakhouse	\$ -	\$ -	\$ 283.44	\$ -	\$ 240.00	\$ 360.00	\$ 76.95	\$ 321.27	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,281.66
Thomas and Mack Center	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 803.53	\$ -	\$ 803.53
UNLV	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 803.53	\$ 803.53
Venetian/Palazzo	\$ -	\$ 906.95	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 906.95
Entertainment	\$ -	\$ 2,010.00	\$ -	\$ -	\$ 1,415.00	\$ 3,104.19	\$ 2,717.78	\$ 2,357.51	\$ -	\$ 832.93	\$ 1,722.00	\$ 2,658.00	\$ 3,945.00	\$ 20,762.41
Las Vegas Events	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 305.00	\$ 305.00
PRCA	\$ -	\$ 2,010.00	\$ -	\$ -	\$ 1,415.00	\$ 3,104.19	\$ 2,717.78	\$ 2,357.51	\$ -	\$ 832.93	\$ 1,722.00	\$ 2,658.00	\$ 3,640.00	\$ 20,457.41
Grand Total	\$ 3,089.59	\$ 4,328.53	\$ 4,000.99	\$ 4,102.27	\$ 10,640.07	\$ 11,033.23	\$ 12,237.82	\$ 7,570.73	\$ 3,402.69	\$ 832.93	\$ 6,875.31	\$ 8,473.93	\$ 19,224.13	\$ 95,812.22

Category	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	TOTAL
Hotel	\$ 2,042.04	\$ 949.20	\$ 3,417.55	\$ 3,652.27	\$ 3,062.36	\$ 3,000.00	\$ 3,414.70	\$ 2,031.75	\$ 3,402.69	\$ -	\$ 4,885.05	\$ 4,738.96	\$ 12,220.64	\$ 46,817.21
Limo/Shuttle	\$ -	\$ -	\$ -	\$ -	\$ 436.44	\$ 1,311.22	\$ 2,832.39	\$ 2,860.20	\$ -	\$ -	\$ -	\$ -	\$ 2,254.96	\$ 9,695.21
Meals	\$ 1,047.55	\$ 1,369.33	\$ 583.44	\$ 450.00	\$ 5,726.27	\$ 3,617.82	\$ 3,272.95	\$ 321.27	\$ -	\$ -	\$ -	\$ 1,076.97	\$ 803.53	\$ 18,537.39
Entertainment	\$ -	\$ 2,010.00	\$ -	\$ -	\$ 1,415.00	\$ 3,104.19	\$ 2,717.78	\$ 2,357.51	\$ -	\$ 832.93	\$ 1,722.00	\$ 2,658.00	\$ 3,945.00	\$ 20,762.41
Grand Total	\$ 3,089.59	\$ 4,328.53	\$ 4,000.99	\$ 4,102.27	\$ 10,640.07	\$ 11,033.23	\$ 12,237.82	\$ 7,570.73	\$ 3,402.69	\$ 832.93	\$ 6,875.31	\$ 8,473.93	\$ 19,224.13	\$ 95,812.22

MUR82550004

report_year	image_number	recipient_name	Vendor	disbursement_description	disbursement_date	disbursement_amount	disbursement_purpose_category	Category
2012	13960603972	MGM GRAND HOTEL	MGM Grand	TRAVEL: MEAL EXPENSE	12/8/2012	\$113.83	TRAVEL	Meal
2012	12951430540	BINION'S HOTEL	Binion's	FOOD FOR FUNDRAISER	12/10/2011	\$348.55	OTHER	Meal
2011	12970347643	MGM GRAND HOTEL	MGM Grand	TRAVEL: DEPOSIT FOR HOTEL	12/8/2011	\$500.00	OTHER	Hotel
2012	12951430541	PALAZZO STADIUM CLUB	Venetian/Palazzo	FOOD FOR FUNDRAISER	12/10/2011	\$906.95	OTHER	Meal
2012	13960603973	MGM GRAND HOTEL	MGM Grand	TRAVEL: HOTEL EXPENSE	12/9/2012	\$949.20	MATERIALS	Hotel
2011	12970347643	MGM GRAND HOTEL	MGM Grand	FUNDRAISING: CATERING AND ROOM RENTAL	12/12/2011	\$1,047.55	ADMINISTRATIVE	Meal
2011	12970347644	MGM GRAND HOTEL	MGM Grand	TRAVEL: HOTEL EXPENSE	12/13/2011	\$1,542.04	MATERIALS	Hotel
2012	12951430533	PRCA	PRCA	FUNDRAISING: TICKETS	1/6/2012	\$2,010.00	OTHER	Sporting Event Tickets
2013	14940278291	MORELS FRENCH STEAKHOUSE	Morel's French Steakhouse	TRAVEL: MEAL EXPENSE	12/8/2013	\$283.44	TRAVEL	Meal
2013	14940278299	4 QUEENS	4 Queens	TRAVEL: MEAL EXPENSE	12/6/2013	\$300.00	TRAVEL	Meal
2013	13940549929	MGM GRAND HOTEL	MGM Grand	FUNDRAISING	12/9/2012	\$375.20	OTHER	Hotel
2014	15950577551	MORELS FRENCH STEAKHOUSE	MGM Grand	FUNDRAISING: MEAL FOR FUNDRAISER	12/6/2014	\$450.00	TRAVEL	Meal
2013	14940278298	THE VENETIAN/THE PALAZZO	Venetian/Palazzo	TRAVEL: HOTEL EXPENSE	12/9/2013	\$529.07	MATERIALS	Hotel
2013	14940278282	THE VENETIAN/THE PALAZZO	Venetian/Palazzo	DEPOSIT FOR HOTEL	9/16/2013	\$913.92	OTHER	Hotel
2014	14952814452	THE VENETIAN/THE PALAZZO	Venetian/Palazzo	HOTEL EXPENSE	10/10/2014	\$1,058.40	MATERIALS	Hotel
2013	14940278285	THE VENETIAN/THE PALAZZO	Venetian/Palazzo	HOTEL EXPENSE	12/9/2013	\$1,599.36	MATERIALS	Hotel
2014	15950577553	THE VENETIAN/THE PALAZZO	Venetian/Palazzo	TRAVEL: HOTEL EXPENSE	12/7/2014	\$2,593.87	MATERIALS	Hotel
2016	201701319042359977	ODS TRANSPORTATION	ODS Transportation	SHUTTLE EXPENSE	12/6/2016	\$88.00	MATERIALS	Limo/Shuttle
2015	201601319004985323	MORELS FRENCH STEAKHOUSE	Morel's French Steakhouse	MEAL EXPENSE	12/4/2015	\$240.00	TRAVEL	Meal
2016	201701319042359976	ODS TRANSPORTATION	ODS Transportation	SHUTTLE EXPENSE	12/5/2016	\$247.94	MATERIALS	Limo/Shuttle
2016	201701319042359975	MORELS FRENCH STEAKHOUSE	Morel's French Steakhouse	MEAL EXPENSE	12/2/2016	\$360.00	TRAVEL	Meal
2016	201606169018218373	PRCA	PRCA	TICKETS FOR FUNDRAISER	1/22/2016	\$400.00	OTHER	Sporting Event Tickets
2016	201701319042359979	ODS TRANSPORTATION	ODS Transportation	SHUTTLE EXPENSE	12/21/2016	\$425.84	MATERIALS	Limo/Shuttle
2015	201601319004985323	ODS TRANSPORTATION	ODS Transportation	SHUTTLE EXPENSE	12/5/2015	\$436.44	MATERIALS	Limo/Shuttle
2016	201701319042359976	ODS TRANSPORTATION	ODS Transportation	SHUTTLE EXPENSE	12/4/2016	\$549.44	MATERIALS	Limo/Shuttle
2016	201610149032536417	WYNN	Wynn	DEPOSIT FOR HOTEL	8/19/2016	\$1,000.00	OTHER	Hotel
2015	201510159003052682	THE VENETIAN/THE PALAZZO	Venetian/Palazzo	HOTEL EXPENSE	7/16/2015	\$1,025.92	MATERIALS	Hotel
2016	201610149032536424	PRCA	PRCA	TICKETS FOR FUNDRAISER	9/27/2016	\$1,116.50	OTHER	Sporting Event Tickets
2015	201510159003052683	PRCA	PRCA	TICKETS FOR FUNDRAISER	7/20/2015	\$1,415.00	OTHER	Sporting Event Tickets
2016	201606169018218375	PRCA	PRCA	TICKETS FOR FUNDRAISER	2/1/2016	\$1,587.69	OTHER	Sporting Event Tickets
2016	201612089040553234	WYNN	Wynn	DEPOSIT FOR HOTEL EXPENSE	11/23/2016	\$2,000.00	MATERIALS	Hotel
2015	201601319004985323	THE VENETIAN/THE PALAZZO	Venetian/Palazzo	HOTEL EXPENSE	12/6/2015	\$2,036.44	MATERIALS	Hotel
2016	201701319042359976	LACAVE AT WYNN	Lacave at Wynn	FOOD FOR FUNDRAISER	12/5/2016	\$3,257.82	OTHER	Meal
2015	201601319004985322	LAKESIDE GRILL	Lakeside Grill	FOOD FOR FUNDRAISER	12/4/2015	\$5,486.27	OTHER	Meal
2017	201801319091141539	MORELS STEAKHOUSE	Morel's French Steakhouse	MEAL EXPENSE	12/8/2017	\$76.95	TRAVEL	Meal
2018	201901319144312486	MORELS STEAKHOUSE	Morel's French Steakhouse	MEAL EXPENSE	12/7/2018	\$321.27	TRAVEL	Meal
2017	201801319091141541	WYNN	Wynn	HOTEL EXPENSE	12/16/2017	\$367.02	MATERIALS	Hotel
2018	201804159108188508	PRCA	PRCA	TICKETS FOR RODEO	1/27/2018	\$852.51	OTHER	Sporting Event Tickets
2017	201707159066748131	WYNN	Wynn	HOTEL ROOM DEPOSIT	6/21/2017	\$1,000.00	OTHER	Hotel
2017	2017041590525252867	PRCA	PRCA	TICKETS FOR FUNDRAISER	3/22/2017	\$1,254.78	OTHER	Sporting Event Tickets
2017	201710159075744445	PRCA	PRCA	TICKETS FOR FUNDRAISER	9/4/2017	\$1,463.00	OTHER	Sporting Event Tickets
2018	201812069134956602	PRCA	PRCA	TICKETS FOR RODEO	11/5/2018	\$1,505.00	OTHER	Sporting Event Tickets
2018	201807159115619243	THE VENETIAN/THE PALAZZO	Venetian/Palazzo	HOTEL EXPENSE	6/23/2018	\$2,031.75	MATERIALS	Hotel
2017	201801319091141536	WYNN	Wynn	HOTEL EXPENSE	11/29/2017	\$2,047.68	MATERIALS	Hotel
2017	201801319091141540	AWG AMBASSADOR	AWG Ambassador	SHUTTLE BUSES	12/11/2017	\$2,832.39	OTHER	Limo/Shuttle
2018	201810159125179454	AWG AMBASSADOR	AWG Ambassador	SHUTTLE BUSES	9/10/2018	\$2,860.20	OTHER	Limo/Shuttle
2017	201801319091141539	LACAVE AT WYNN	Lacave at Wynn	FOOD FOR FUNDRAISER	12/9/2017	\$3,196.00	OTHER	Meal
2020	202007159244997837	PRCA	PRCA	TICKETS FOR RODEO	6/30/2020	\$832.93	OTHER	Sporting Event Tickets
2019	202001319185086169	WYNN	Wynn	HOTEL EXPENSE	12/9/2019	\$3,402.69	MATERIALS	Hotel
2022	202301319575611506	FLEUR MANDALAY BAY	Fleur Mandalay Bay	FOOD AND BEVERAGE	12/3/2022	\$273.44	OTHER	Meal
2022	202210159532669814	FOUR SEASONS HOTEL	Four Seasons Hotel	SUB-VENDOR	7/14/2022	\$339.01	OTHER	Hotel
2021	202201319485412073	THE VENETIAN/THE PALAZZO	Venetian/Palazzo	HOTEL DEPOSIT	10/27/2021	\$395.70	OTHER	Hotel
2021	202201319485412069	THE VENETIAN/THE PALAZZO	Venetian/Palazzo	HOTEL DEPOSIT	10/6/2021	\$564.64	OTHER	Hotel
2022	202204159496677294	THOMAS AND MACK	Thomas and Mack Center	FOOD AND BEVERAGE	2/10/2022	\$803.53	OTHER	Meal
2021	202110159467597068	THE VENETIAN/THE PALAZZO	Venetian/Palazzo	HOTEL DEPOSIT	9/24/2021	\$979.95	OTHER	Hotel
2022	202210279541919629	FOUR SEASONS HOTEL	Four Seasons Hotel	DEPOSIT FOR HOTEL EXPENSE	10/11/2022	\$1,017.03	MATERIALS	Hotel
2022	202301319575611505	FOUR SEASONS HOTEL	Four Seasons Hotel	HOTEL EXPENSE	11/30/2022	\$1,283.47	MATERIALS	Hotel
2021	202201319485412077	PRCA	PRCA	TICKETS FOR RODEO	11/8/2021	\$1,722.00	OTHER	Sporting Event Tickets
2022	202301319575611506	FOUR SEASONS HOTEL	Four Seasons Hotel	HOTEL EXPENSE	12/5/2022	\$2,099.45	MATERIALS	Hotel
2022	202301319575611507	PRCA	PRCA	TICKETS FOR RODEO	12/5/2022	\$2,658.00	OTHER	Sporting Event Tickets
2021	202201319485412081	THE VENETIAN/THE PALAZZO	Venetian/Palazzo	HOTEL DEPOSIT	11/19/2021	\$2,944.76	OTHER	Hotel
2023	202401319608117519	LAS VEGAS EVENTS	Las Vegas Events	TICKETS	10/31/2023	\$305.00	OTHER	Sporting Event Tickets
2023	202307159583530311	UNLV BOARD OF REGENTS	UNLV	FOOD AND BEVERAGE	4/4/2023	\$803.53	OTHER	Meal
2023	202307149582834530	WYNN	Wynn	DEPOSIT FOR HOTEL	2/20/2023	\$2,000.00	OTHER	Hotel
2023	202307149582834531	WYNN	Wynn	DEPOSIT FOR HOTEL	2/23/2023	\$2,000.00	OTHER	Hotel
2023	202401319608117535	AWG AMBASSADOR	AWG Ambassador	TRANSPORTATION	12/9/2023	\$2,254.96	OTHER	Limo/Shuttle
2023	202310139597505197	PRCA	PRCA	TICKETS FOR RODEO	9/29/2023	\$3,640.00	OTHER	Sporting Event Tickets
2023	202401319608117527	WYNN	Wynn	HOTEL EXPENSE	12/5/2023	\$4,104.94	MATERIALS	Hotel
2023	202310139597505185	WYNN	Wynn	DEPOSIT FOR HOTEL	7/26/2023	\$4,115.70	OTHER	Hotel

TOTAL

\$95,543.96