

# JONES DAY

51 LOUISIANA AVENUE, N.W. • WASHINGTON, D.C. 20001-2113  
TELEPHONE: +1.202.878.3939 • FACSIMILE: +1.202.626.1700

DIRECT NUMBER: (202) 878-3732  
WMC@JONESDAY.COM

May 23, 2016

**VIA E-MAIL TOBRIEN@FEC.GOV**

Mr. Terry O'Brien  
Auditor  
Audit Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: Oklahoma Leadership Council Draft Final Audit Report Response

Dear Mr. O'Brien:

On behalf of our client, the Oklahoma Leadership Council ("OLC" or the "Committee"), this responds to the Draft Final Audit Report ("DFAR") that was delivered to our client May 5, 2016. As discussed below, the Committee has fully complied with the Audit Division's recommendations as set forth in the DFAR. We also wish to inform the Commission that OLC is not requesting an audit hearing in this matter.

The record in this matter clearly demonstrates that the Committee fully cooperated with the Audit Division during the course of this audit. It is our expectation that the Audit Division, Office of the General Counsel, and the Commission itself will review the DFAR and the Committee's response in a fair and objective manner.

**OLC's Responses to the DFAR Findings and Recommendations**

**Findings 1 (Misstatement of Financial Activity) & 3 (Record Keeping for Employees):** As stated in the DFAR, OLC has materially complied with the Auditors' Interim Audit Report recommendations for Findings 1 and 3 and no further action is required.

**Finding 2: Misstatement of Financial Activity-Levin Fund**

In response to the Interim Audit Report (IAR) and after consulting with the Audit Division, OLC was instructed that it may correct the public record in the financial misstatement findings in the IAR by filing a Form 99 with the Committee's March monthly report rather than filing amended 2011 and 2012 reports. In addition, the Audit Division requested OLC make a one-time audit

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adjustment and file an amended 2012 Year-End report. OLC complied with the audit division's revised recommendations as detailed in the February 19, 2016 email from auditor Terry O'Brien.

On April 29, 2016, Mr. O'Brien sent an email asking a question about OLC's Form 99. Specifically, he asked about why the Form 99 did not contain the January 25, 2012 \$10,000 Levin Fund deposit. On May 4, 2016, we submitted a draft Form 99 listing the January 25, 2012 \$10,000 Levin Fund deposit for his review. On May 5, 2016, Mr. O'Brien replied via email that the draft Form 99 "looks factually accurate and, if filed as such, will resolve the Levin misstatement." OLC filed the Levin Fund Form 99 on May 5, 2016 and submitted written evidence of the filing to the auditors on the same date. Accordingly, OLC has materially complied with the audit division's recommendations.

**Finding 4: Contributions from Unregistered Political Organizations**

As stated in response to the IAR, on March 1, 2016, OLC transferred \$1,000 from its federal account to the state account in accordance with the Audit Division's recommendation for IAR Finding 4, as modified by Mr. O'Brien's February 19, 2016 email. Attached as are the relevant page's from OLC's April 20 monthly report disclosing the transfer. (See Attachment 1.)

In addition, attached are the Oklahoma state campaign finance reports of the unregistered committees that make up contributions in the amount of \$7,150. These reports demonstrate that each unregistered committee had sufficient permissible funds to make each donation. (See Attachment 2.) Accordingly, OLC has materially complied with the audit division's recommendations.

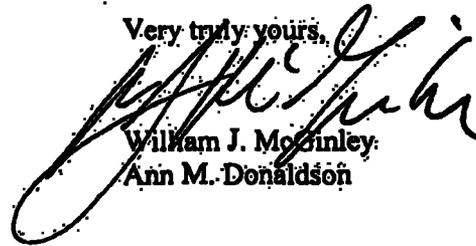
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**Conclusion**

We respectfully request that the Audit Division, Office of the General Counsel, and the Commission fairly and objectively review the DFAR and the responses submitted on behalf of our client, OLC. The record in this matter clearly demonstrates that OLC has fully cooperated with the Audit Division in an effort to resolve this audit as expeditiously as possible.

Very truly yours,

A large, stylized handwritten signature in black ink, appearing to read 'William J. Moranley', is written over the typed name.

William J. Moranley  
Ann M. Donaldson

**Attachments**