FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

July 28, 2014

ANTHONY J. FERATE, TREASURER
OKLAHOMA LEADERSHIP COUNCIL
4031 N. LINCOLN BOULEVARD
OKLAHOMA CITY, OK 73105

Response Due Date
09/02/2014

IDENTIFICATION NUMBER: C00167213

REFERENCE: OCTOBER MONTHLY REPORT (09/01/2013 - 09/30/2013)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action**. Additional information is needed for the following **7** item(s):

1. The beginning cash balance of this report does not equal the ending balance of your Amended September Monthly Report (8/1/13-8/31/13), received 10/2/13. Please correct this discrepancy and amend all subsequent report(s) that may be affected by the correction. (2 U.S.C. § 434)(b)(1))

2. The totals listed on Line(s) 6(c), 7, 11(a)(i), 11(a)(ii), 11(a)(iii), 11(d), 15, 17, 19, 20, 21(b), 21(c), 31, and 32, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (2 U.S.C. § 434(b))

3. Your calculations for Line 8 appear to be incorrect. Cash on hand at the close of the current reporting period should always equal the closing calendar year to date cash on hand amount. Please provide the corrected total on the Summary Page. (2 U.S.C. § 434(b))

4. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of $200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

• clearly ask for the missing information, without soliciting a contribution,
• inform the contributor of the requirements of federal law for the reporting of such information, and
• if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

5. Your report discloses activity outside the coverage dates. This report should include only activity that occurred from 9/1/13 to 9/30/13. Please amend this report and any previous reports so that all activity is disclosed in the report covering the period in which the activity occurred. (2 U.S.C. § 434(b))

6. Schedule D of your report itemizes debt owed to "OG&E," "McNally Printing," "Steve Hammontree," "Credit Card Operations," "David Gagne," "Panera Bread," and "USPS" with outstanding beginning balances not included on your previous report. Please file an amendment to your report(s) to correct this discrepancy. (11 CFR § 104.11(b))

7. Schedule D of your report itemizes debt owed by "Oklahoma Natural Gas," "Steve Hammontree," and "Gaylene Stupic" with outstanding beginning balances not included on your previous report. Please file an amendment to your report(s) to correct this discrepancy. (11 CFR § 104.11(b))

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered**.

<u>Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended</u>. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1148.

Sincerely,

Quy Vuong
Senior Campaign Finance Analyst
Reports Analysis Division