

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

March 4, 2011

Anthony J. Ferate, Treasurer Oklahoma Leadership Council 4031 N. Lincoln Boulevard Oklahoma City, OK 73105

Response Due Date: April 8, 2011

Identification Number:

C00167213

Reference:

12 Day Pre-General Report (10/1/10-10/13/10)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 item:

-Schedule L-B supporting Line 5 of Schedule L of your report discloses \$59,709.61 in disbursements for "Telephone Polling" and "Telephone Survey — Voter ID," which appear to be payments made for Federal Election Activity with 100% Levin funds. Please be advised that a State, district, or local committee of a political party may pay for allocable Federal Election Activity expenses either entirely with Federal funds or with an allocation of Federal and Levin funds. It appears you have used impermissible funds to pay for this allocable Federal Election Activity. 11 CFR §300.32(c)(4)

Please be advised that 11 CFR §102.5 prohibits a non-federal or Levin account from fimincing activity in connection with federal elections. The Commission recommends that you immediately transfer the federal portion of this allocable Federal Election Activity to your non-federal or Levin account and disclose this transaction as a transfer-out on Schedule B supporting Line 22 of the Detailed Summary Page, and as a receipt on Schedule L-A supporting Line 2 of Schedule L, or provide clarifying information regarding the apparent impermissible payment(s).

Although the Commission may take further legal action regarding the activity conducted by your non-federal or Levin account, any clarifying information that you can provide will be taken into consideration.

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.

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. 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) 694-1140.

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James McAllister

Campaign Finance Analyst Reports Analysis Division