



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

June 3, 2013

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

**Response Due Date**  
**07/08/2013**

IDENTIFICATION NUMBER: C00167213

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/18/2012 -  
11/26/2012), RECEIVED 04/30/2013

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 4 item(s):

1. The beginning cash balance of this report does not equal the ending balance of your Amended 12 Day Pre-General Report (10/1/12 - 10/17/12), received 1/16/13. Please correct this discrepancy and amend all subsequent reports(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, 18(b), 18(c), 19, 21(b), 21(c), 30(b), 30(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. Schedule B supporting Line 30(b) of your report discloses a payment(s) for "DIRECT MAIL," which is categorized as Federal Election Activity and therefore, may require the disclosure of the candidate(s) this activity should be attributed to. Expenditures and disbursements for public communications that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any candidate for Federal office, meet the definition

OKLAHOMA LEADERSHIP COUNCIL

Page 2 of 3

of Federal Election Activity under 11 CFR §100.24 and should be disclosed on Schedule B for Line 30(b) along with the identity of the candidate(s).

Further, please be advised that public communications that meet the definition of Federal Election Activity and that also contain express advocacy as defined under 11 CFR §100.22, but do not meet the conditions of exempt activity, would constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure and should be properly disclosed on a Schedule B, E or F supporting Lines 23, 24 or 25, as appropriate rather than on Schedule B for Line 30(b). Please clarify if this activity meets the definition of Federal Election Activity or if it contains express advocacy and amend your report to properly disclose this activity, if necessary.

4. Your amended report discloses additional disbursements of Levin funds totaling \$18,036 on Line(s) 4(d) of the Schedule L Aggregation Page that were not disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR §300.36)

**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.

OKLAHOMA LEADERSHIP COUNCIL

Page 3 of 3

Sincerely,

A handwritten signature in black ink, appearing to read "J McAllister". The signature is fluid and cursive, with the first name "J" and last name "McAllister" clearly distinguishable.

James McAllister  
Senior Campaign Finance Analyst  
Reports Analysis Division