



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Kathleen M. Guith
Associate General Counsel for Enforcement

Stephen A. Gura
Deputy Associate General Counsel for Enforcement

BY: Mark Allen *MA*
Assistant General Counsel

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Attorney

SUBJECT: MUR 7215 (Oklahoma Leadership Council) - Pre-Probable Cause Conciliation Agreement

On February 7, 2017, the Commission found reason to believe that Oklahoma Leadership Council ("Committee") violated 11 C.F.R. § 106.7(d)(1) by failing to maintain payroll logs on \$178,305 in salary payments during the 2012 election cycle to document the percentage of time that each employee spent on a Federal election.¹ The Commission also authorized pre-probable cause conciliation with the Committee and approved a conciliation agreement.² We are attaching a negotiated conciliation agreement that has been signed by the treasurer of the Committee.³ We recommend that the Commission accept the negotiated agreement and close the file in this matter.

¹ See Certification, MUR 7215 (Feb. 8, 2017).

² *Id.*

³ Attachment I.

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6 We therefore
7 recommend that the Commission accept the signed conciliation agreement with the Committee
8 and close the file.
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10 **RECOMMENDATIONS:**
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- 12 1. Accept the attached conciliation agreement with Oklahoma Leadership Council and
13 Peter Leo Hodges in his official capacity as treasurer;
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15 2. Approve the appropriate letter; and
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17 3. Close the file.
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