



# OKLAHOMA ETHICS COMMISSION

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In the matter of: )  
 )  
 CARL PARSON, as candidate, LARRY )  
 BARNES, as Chair of Carl Parson for House )  
 District 8, 2016, GARY BARNES, as Treasurer )  
 for Carl Parson for House District 8, 2016, )  
 CARL PARSON FOR HOUSE DISTRICT 8, )  
 2016 (Ethics ID: 7922), a candidate committee, )  
 and CARL PARSON FOR HOUSE DISTRICT )  
 8, 2020 (Ethics ID: 9673), a candidate committee,) )  
 )  
 )  
 Respondents. )

Ethics Commission  
Case No. 2019-04

## SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”), between the Oklahoma Ethics Commission (“Commission”) and Carl Parson (“Respondent” or “Mr. Parson”), personally and in his named capacity as candidate, resolves all issues in this matter for all Respondents listed in the captioned case. This Agreement is conditioned on approval by the Commission and will become effective upon such approval.

**A. The Commission and Respondent both acknowledge the following:**

1. That the Commission is authorized to initiate investigations on possible violations of the Oklahoma Ethics Rules and to resolve investigations through civil prosecution or Settlement Agreements, pursuant to Article XXIX, Section 4 of the Oklahoma Constitution and 74 O.S., Ch. 62 Appendix I (the “Ethics Rules”).
2. That on March 13, 2020, pursuant to Ethics Rule 6.7, the Commission determined there was reasonable cause to believe that a violation of the Ethics Rules may have occurred and authorized an investigation into Respondents.

3. That Mr. Parson was a candidate for House of Representatives, District 8, in 2016 and 2018.
4. That Mr. Parson was not a candidate in the 2020 elections and did not file a Declaration of Candidacy with the Oklahoma Election Board for the 2020 elections.
5. That Mr. Parson did not participate in a Pre-Runoff Primary Election or General Election in the 2016 or 2018 elections.
6. That a candidate committee was registered with the Commission in The Guardian System ("the Guardian") by the name of Carl Parson for House District 8, 2016 ("2016 Committee") on June 24, 2015.
7. That a candidate committee was registered with the Commission in the Guardian by the name of Carl Parson for House District 8, 2020 ("2020 Committee") on November 6, 2018.
8. That Larry Barnes is listed as the Chair of 2016 Committee and 2020 Committee.
9. That Garry Barnes is listed as the Treasurer of 2016 Committee.
10. That, upon reviewing the filed reports and bank statements for Mr. Parson's campaigns, the following issues were found:
  - a. A check for \$5,400 from Brad Parson was accepted by Respondents for Mr. Parson's 2016 campaign in excess of the individual contribution limit for the 2016 Primary Election, in violation of Ethics Rule 2.37, which limits individual contributions to 2016 candidate committees to \$2,700 per election that the candidate's name appears on the ballot;
  - b. A 2018 candidate committee was not registered for Carl Parson's 2018 campaign, in violation of Ethics Rule 2.70, which requires a Statement of Organization for a candidate committee to be filed with the Commission no later than ten (10) days

after the candidate has accepted or spent in excess of One Thousand Dollars (\$1,000) for his or her campaign; and

c. Reports of Contributions and Expenditures were not filed for Carl Parson's 2018 campaign in violation of Ethics Rules 2.100 and 2.101.

11. That Mr. Parson has been cooperative and responsive to document requests throughout the investigation.

12. That Mr. Parson, in accordance with the bank statements, did disclose all of the transactions that occurred in the 2018 campaign, although the activity was incorrectly reported in 2016 Committee.

13. On January 21, 2021, a *Notice of Allegations*, was issued to Respondents in the above captioned case.

14. On January 29, 2021, a twenty (20) day extension was requested by counsel on behalf of Mr. Parson, and, the same day, the Commission automatically granted the extension request, pursuant to Ethics Rule 6.10.

15. On March 2, 2021, a timely response was submitted to Commission on behalf of Mr. Parson.

16. No other responses have been provided.

17. That Mr. Parson seeks to get into compliance with the Ethics Rules.

18. That Mr. Parson voluntarily enters into this agreement with the Commission to resolve all outstanding matters presented in the *Notice of Allegations*.

**B. THEREFORE**, the Commission and Mr. Parson agree as follows:

1. Within 30 days of the Commission's approval of this agreement, Mr. Parson shall:

a. refund the excessive contribution of Two Thousand Seven Hundred Dollars (\$2,700) to Brad Parson and provide proof of said payment to the Commission;

- b. pay a One Thousand Dollar (\$1,000) compliance fee via certified or cashier's check to the Commission for failing to register and file reports for Carl Parson's 2018 campaign;
- c. register a 2018 candidate committee for Carl Parson's 2018 campaign and pay the \$150 registration fee to the Commission as required for 2018 candidate committees;
- d. file all outstanding Reports of Contributions and Expenditures for Carl Parson's 2018 campaign to reflect the actual activity of the campaign in 2018;
- e. dissolve the 2018 candidate committee for Carl Parson's campaign in accordance with the Ethics Rules, including filing a final report with the Commission;
- f. amend and file, as necessary, any and all reports to reflect the actual activity of the 2016 Committee;
- g. amend and file, as necessary, any and all reports to reflect the actual activity of 2020 Committee; and
- h. dissolve 2020 Committee in accordance with the Ethics Rules as described in section two (2) below.

2. The dissolution of 2020 Committee includes:

- a. amending and filing any and all outstanding reports with the Commission necessary to reflect the actual activity of 2020 Committee;
- b. selling of assets, if any, of 2020 Committee and depositing resulting funds into 2020 Committee's depository;
- c. forfeiture of any funds remaining in the committee's depository that are not otherwise obligated for current liabilities to the State of Oklahoma general revenue fund;
- d. closing the depository accounts used for the 2020 Committee;

- e. filing a final report with the Commission; and
  - f. any other actions necessary to dissolve the committee in accordance with the Ethics Rules.
3. Mr. Parson shall provide proof of any forfeiture of funds to the general revenue fund and closure of the 2020 committee depository to Commission within 10 days of the forfeiture of funds and closure of the 2020 committee depository, respectively.
  4. That, upon receiving notice of Mr. Parson's compliance with sections (B)(1)-(3) *supra*, the Commission will dismiss Case No. 2019-04 no later than the next Commission meeting.
  5. That this Agreement shall become effective upon the date of its approval by the Commission.
  6. That this Agreement constitutes the entire agreement between the parties on the matters raised within, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained within this written agreement shall be enforceable.
  7. That this Agreement is limited to the facts of this case and shall not have binding precedential effect for any other matter currently pending before the Commission or that may come before the Commission at a future date.
  8. That Mr. Parson is responsible for all attorney fees and costs incurred by the Commission for their breach of this settlement agreement.

**FOR THE COMMISSION:**



Ashley Kemp,  
Executive Director

4/11/2021  
DATE

**RESPONDENT:**

*William R Higgins for Carl Parson.*

Carl Parson,  
Respondent

DATE

*Approval authorized by Carl Parson - 6-11-21.*