



# OKLAHOMA ETHICS COMMISSION

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STATE OF OKLAHOMA, *ex rel.*, )  
 OKLAHOMA ETHICS COMMISSION, )  
 )  
 Petitioner, )  
 )  
 v. )  
 )  
 TYLER GREY, Individually and as )  
 Candidate, Chair, and Treasurer, TYLER )  
 GREY COMMITTEE; and TYLER GREY )  
 COMMITTEE, )  
 )  
 Respondents. )

CASE NO. CV-2019-63,  
 In the District Court of Oklahoma County

## SETTLEMENT AGREEMENT

The captioned case was filed by the Oklahoma Ethics Commission ("Commission") on January 10, 2019.

NOW, THEREFORE, the Commission and the Respondents agree as follows:

1. Respondents enter voluntarily into this agreement with the Commission.
2. On April 13, 2018, Tyler Grey filed a declaration of candidacy for State Representative, District 83, for the 2018 general election.
3. Shortly after filing his declaration of candidacy, Respondent Grey accepted a job in Stillwater and never took any actions to pursue running for House District 83. However, Respondent Grey (mistakenly) believed he was required to register a candidate committee with the Commission because his name was on the ballot. He therefore registered with the Commission on June 18, 2019, a candidate committee naming himself as Candidate, Chair, and Treasurer of the candidate committee.

4. Respondent Grey did not pay the registration and administration fee and complete the registration with the Commission until February 25, 2019.
5. Nevertheless, Respondents' initial registration triggered the obligation to file reports of contributions and expenditures in the Guardian System until a final report was filed and the candidate committee dissolved.
6. Respondents did not open a depository account for the candidate committee and did not accept any monetary contributions.
7. The only contributions the candidate committee received were in-kind contributions from Respondent Grey, totaling \$752.50, for candidate filing with the State Election Board and registration of the candidate committee with the Ethics Commission.
8. Respondent failed to file the following reports of contributions and expenditures:
  - 2018 Partial Quarter Election Report
  - 2018 Pre-General Election Report
  - 2018 Pre-Runoff Election Report
9. Respondent's failure to file these three reports incurred a late fee of \$1,000 for each violation for failure to file a report, totaling \$3,000.
10. The Commission agrees to dismiss with prejudice the pending district court action in consideration of the following:
  - a. The Commission acknowledges Respondents have now paid their \$250 registration and administration fee, completed registration with the Ethics Commission, filed all outstanding reports of contributions and expenditures in the Guardian System, and dissolved the Candidate Committee.
  - b. Respondents will pay the Commission \$375 for attorney fees and cost of service of process within 30 days of the effective date of this agreement.

11. This agreement shall become effective as of the date that all parties have executed this agreement and the Commission has approved this agreement at an official meeting.
12. 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.
13. This settlement agreement is limited to the facts of this case. This settlement agreement 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.

**FOR THE COMMISSION:**

By: \_\_\_\_\_

Ashley Kemp  
Executive Director

5/10/2019  
Date

**FOR RESPONDENTS:**

By: \_\_\_\_\_

Tyler Grey

3-12-19  
Date