



OKLAHOMA ETHICS COMMISSION

PHONE: (405) 521-3451 • FAX: (405) 521-4905 • WEBSITE: WWW.ETHICS.OK.GOV

In the matter of:

Friends of Marty Quinn Senate 2018,)	
Marty Quinn, individually, Chair, and Candidate)	Ethics Commission
Kelly Quinn, individually, and as Treasurer)	Case No. 2023-5
Respondents.)	

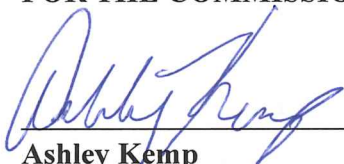
SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) between the Oklahoma Ethics Commission (“Commission”) and *Friends of Marty Quinn Senate 2018*, candidate committee (“2018 committee”). This Agreement is conditioned on and will become effective upon approval by the Commission. This Agreement resolves the above-captioned case for listed Respondents. **It is hereby agreed by the parties:**

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 February 10, 2023, pursuant to Ethics Rule 6.7, the Commission determined there was reasonable cause to believe that one or more violations of the Ethics Rules may have occurred and authorized an investigation in this matter.
3. That Respondents file a Statement of Organization with the Commission in The Guardian System for a 2018 candidate committee.
4. That Ethics Rules restrict the use of campaign contributions by state candidate committees to expenditures for specific purposes: ordinary and necessary campaign expenses, operating expenses of the committee, contributions to another state level candidate committee, officeholder expenses, and the options available for expenditure of any surplus funds. Ethics Rules 2.39, 2.43, 2.44, and 2.48.
5. That Respondents caused a contribution of \$10,000 to be made from state committee funds to the federal political action committee *Quinn Works PAC* on or about June 7, 2022, an expenditure of candidate committee funds not permitted within the Oklahoma Ethics Rules.
6. *Quinn Works PAC* is a political action committee registered with the Federal Election Commission “FEC” and pursuant to its filings with the FEC, indicates it was formed to make independent expenditures. Filings with the FEC show:

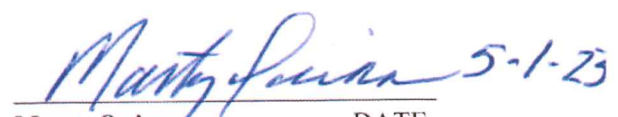
- a. contributions from three separate contributors totaling \$10,000 per contributor prior to the 2022 primary election;
 - b. a single expenditure of \$27,000 in support of Federal candidate Marty Quinn on June 20, 2022; and
 - c. the dissolution of the PAC on July 23, 2022.
7. Respondents entered transactions into the Commission's online reporting system The Guardian System in order to file their 2nd Quarter Contributions and Expenditures Report due July 31, 2022 as required by the Rules. The committee received a warning in The Guardian System when the expenditure to *Quinn Works PAC* was entered that stated "Contribution to PAC is not a valid Expenditure Type". An agent of the Committee called into the Commission office and spoke with a Compliance Officer concerning the transaction and subsequently filed the report which timely and accurately disclosed the expenditure.
 8. That Respondents will pay One Thousand Dollars (\$1,000) to the General Revenue Fund as a penalty to resolve this matter within thirty (30) days of this Agreement being approved by the Commission.
 9. That if not paid within thirty (30) days, the **\$1,000 penalty** may be reduced to judgment subject to lien.
 10. That Respondent is responsible for any attorney fees and costs incurred by the Commission to enforce this Agreement.
 11. 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.
 12. That this Agreement resolves all issues in this matter for all Respondents listed in the captioned case.

FOR THE COMMISSION:



Ashley Kemp 5/12/2023
Executive Director DATE

RESPONDENT:



Marty Quinn 5-1-23
Candidate/Chair DATE