

OKLAHOMA
Ethics Commission

In the matter of:)
) Ethics Commission
Sooner Conservatives Action, LLC) Case No. 2025-14

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is between the Oklahoma Ethics Commission (“Commission”) and Sooner Conservatives Action, LLC (“Sooner”) each individually a “Party” and collectively the “Parties.”

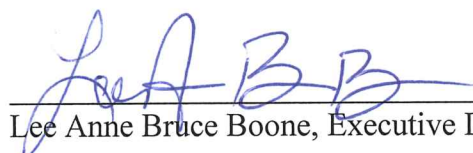
NOW, THEREFORE, the Parties agree as follows:

- 1) The Commission has jurisdiction over Sooner and the subject matter of this agreement.
- 2) Sooner is a limited liability company organized in the State of Delaware and voluntarily enters into this agreement with the Commission.
- 3) This case came before the Commission on August 14, 2025, at which time the Commission determined there was reasonable cause to believe a violation of one or more Campaign Finance Rules may have occurred, and authorized an investigation.
- 4) The Commission determined Sooner issued numerous Independent Expenditures, as defined by Ethics Rule 2.2(11) as a communication that expressly advocates the election or defeat of a clearly identified candidate that is not made in coordination with, cooperation with, consultation with or concert with, or at the request or suggestion of a candidate or the candidate committee or their agents.
- 5) Ethics Rule 2.107 dictates the reporting requirements of Independent Expenditures with the Ethics Commission.
- 6) The Commission’s investigation determined:
 - a) Sooner paid more than \$250,000 in 2024 and 2025 for Independent Expenditures (“IE”) in Oklahoma but reported only a portion of said IEs in 2024, and none in 2025.
 - b) Sooner paid at least six vendors to produce and distribute the 2024 and 2025 Independent Expenditures.
 - c) The Commission issued notices regarding this investigation to Sooner at the address Sooner identified on its IE reports filed in 2024; those notices were returned to the Commission as “undeliverable.”
 - d) Sooner did not respond to the Commission’s phone calls or email inquiries.

- e) Sooner's first communication with the Commission followed the issuance of a subpoena to a third-party vendor.
- 7) In consideration of these factors, Sooner agrees to:
 - a) Within thirty (30) days of the Commission's approval of this Agreement Sooner shall pay a total of Fifteen Thousand Dollars (\$15,000.00) which will be apportioned as follows:
 - i) Sooner shall pay as a civil penalty, by certified check to the State of Oklahoma general revenue fund, an amount of Fourteen Thousand Dollars (\$14,000.00), and provide proof of such payment to the Commission, and
 - ii) Sooner shall pay attorney fees and costs to the Commission in the amount of One Thousand Dollars (\$1,000.00).
 - b. Within sixty (60) days of the Commission's approval of this Agreement, Sooner agrees to file Independent Expenditure reports in The Guardian System to fully report all 2024 and 2025 Independent Expenditures of Sooner consistent with Ethic Rule 2.107.
- 8) This Agreement shall become effective upon approval by the Commission at an official meeting and all Parties have executed this Agreement ("Effective Date").
- 9) This Agreement constitutes the entire agreement between the Parties on the matters raised in this Agreement and any issued notice(s) of allegations in Case No. 2025-14 as of the Effective Date of this Agreement. 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.
- 10) This Agreement is limited to Case No. 2025-14, which may include facts and provisions not contained in this Agreement 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.

Approved and effective this 14 day of November, 2025.

FOR THE COMMISSION:



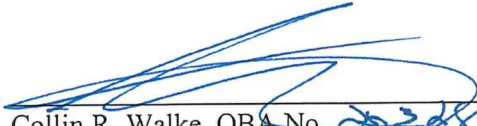
Lee Anne Bruce Boone, Executive Director

11/14/2025
Date

FOR SOONER CONSERVATIVES ACTION, LLC:

Joel Riter
Name: Joel Riter

11/6/2025
Date


Collin R. Walke, OBA No. 26328
Attorney for Sooner Conservatives Action, LLC

11/6/25
Date