



OKLAHOMA ETHICS COMMISSION

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

In the matter of:)	
)	Ethics Commission
Oklahoma Quarter Horse Racing PAC,)	Case No. 2022-04
an Oklahoma limited committee.)	

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is between the Oklahoma Ethics Commission (“Commission”) and Oklahoma Quarter Horse Racing PAC (“Respondent”), along with all current and former officers, each individually a “Party” and collectively the “Parties”.

NOW, THEREFORE, the Parties agree as follows:

- 1) The Commission has jurisdiction over the Respondent and the subject matter of this agreement.
- 2) Respondent voluntarily enters into this agreement with the Commission.
- 3) Respondent is a political action committee (“PAC”) registered with the Commission as a limited committee.
- 4) This Agreement addresses all claims made by the Commission against the Parties in the Notice of Allegations, Case No. 2022-04, dated June 28, 2024, and any revision and/or amendment thereto.
- 5) The Parties acknowledge the following referenced Ethics Rules are applicable to PAC operations and are related to the issues reviewed by Commission staff in this case.
 - a) An Oklahoma PAC may be either a limited committee or an unlimited committee.
 - b) A "limited committee" is a type of PAC that is organized to make contributions to candidates.
 - i) A limited committee is limited in the amount of contributions it can accept from a contributor, the sources from which it can accept contributions, and the purposes for which PAC funds may be spent. Ethics Rules 2.2(13), 2.33 and 2.41.
 - ii) Limited committees are required to file quarterly Reports of Contributions and Expenditures detailing all contributions and expenditures. Ethics Rule 2.100.
 - iii) Limited committee’s Reports of Contributions and Expenditures are required to include “the total amount of all contributions made by the committee to a candidate during the time period covered by the report, and the aggregate total of all such contributions made during the calendar year of the time period covered by the report.” Ethics Rule 2.105(10).
 - iv) Reports of Contributions and Expenditures are required to be filed electronically with the Commission on the day the report is due. Ethics Rule 1.4(A).

- v) Limited committees are required to maintain records of the committees' operations, including records of funds received, accepted, and expended for at least four (4) years. Ethics Rule 2.83 and 2.76.
- 6) To settle the allegations set forth in the notice(s) of allegations and related discussions regarding Case No. 2022-04 issued as of the date of this agreement:
- a) Within thirty (30) days of the Commission's approval of this Agreement Respondent shall pay a total of Eleven Thousand Dollars (\$11,000.00) which will be apportioned as follows:
 - i) Respondent or the entity with which Respondent is affiliated shall pay, as a civil penalty, by certified check to the State of Oklahoma general revenue fund, an amount of Ten Thousand Dollars (\$10,000.00), and provide proof of such payment to the Commission, and
 - ii) Respondent or the entity with which Respondent is affiliated 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, Respondent, in consultation with legal counsel, agrees to amend and/or file new documents in The Guardian System to correct or report transactions of Respondent consistent with the Ethics Rules including:
 - i. Expenditures made by Respondent; and
 - ii. any other inaccurate information identified by the Parties.
 - c) Respondent further agrees to have its then-current officers attend an Ethics Commission continuing education program related to PACs within one (1) year of the first available opportunity to attend such program, whether virtually or in-person.
- 7) This Agreement shall become effective on the date the Commission approves this Agreement at an official meeting and all Parties have executed this Agreement ("Effective Date").
- 8) This Agreement takes into account that Respondent has been fully cooperative during the pendency of this investigation, and that there is no evidence, and therefore no finding, that Respondent's, and/or its current and former officers', reporting errors, or any other errors alleged, were intentional or knowingly made.
- 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. 2022-04 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) Upon completion of the terms of this Agreement, all current and past officers, agents, or employees in Case No. 2022-04, will be fully and finally released from liability under the Ethics Rules for the matters identified in the Notice of Allegations and this Agreement.

11) This Agreement is limited to Case No. 2022-04, 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.

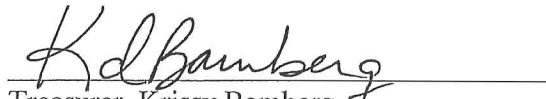
Approved and effective this 13th day of September, 2024.

FOR THE COMMISSION:


LeeAnn Bruce Boone, Executive Director

9/13/24
Date

FOR THE RESPONDENT:


Treasurer, Krissy Bamberg
Oklahoma Quarter Horse Racing PAC,
an Oklahoma Limited Committee

9/5/24
Date