



OKLAHOMA ETHICS COMMISSION

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

STATE OF OKLAHOMA, *ex rel.*,)
 OKLAHOMA ETHICS COMMISSION,)
)
 Petitioner,)
)
 v.)
)
 ERICK PAUL WYATT, Individually)
 and as Candidate, and MERLE BOYD)
 STEELE, Individually and as Chair and)
 Treasurer, ERICK WYATT FOR)
 STATE SENATE 2018; and ERICK)
 WYATT FOR STATE SENATE 2018,)
)
 Respondents.)

CASE NO. CV-2019-292
 In the District Court of Oklahoma County

SETTLEMENT AGREEMENT

The captioned case was filed by the Oklahoma Ethics Commission (“Commission”), against Erick Paul Wyatt, Merle Boyd Steele, and Erick Wyatt for State Senate 2018 (“Respondents”) on February 8, 2019.

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


1. Respondents enter voluntarily into this agreement with the Commission.
2. On April 18, 2018, Erick Paul Wyatt, a candidate for State Senate, District 6, for the 2018 general election, registered with the Commission a candidate committee named “Erick Wyatt for State Senate 2018,” naming himself as Candidate and Merle Boyd Steele as Chair and Treasurer of the committee.
3. The 2018 committee failed to file a 2018 Pre-General Election Report and on November 8, 2018, the Commission issued a proposed compliance order. The proposed compliance

order provided a 30-day period for the committee to request a hearing on the proposed compliance order before an administrative law judge, but no hearing was requested.

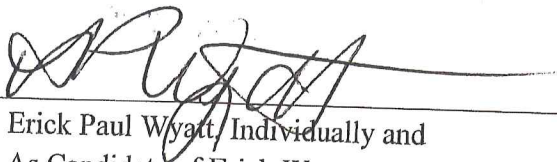
4. A final order was issued by the Commission on December 20, 2018, assessing a \$1,000 compliance fee for failing to file the 2018 Pre-General Election Report
5. The Commission agrees to dismiss with prejudice the pending district court action in consideration of the following:
 - a. The Commission acknowledges Respondent Erick Wyatt for State Senate 2018 has now been dissolved.
 - b. Respondents Wyatt and/or Steele will pay \$125.00 to the Commission on the first day of each month, for 12 months, beginning the first day of the month following the Ethics Commission's approval of this settlement agreement, which total amount includes the \$1,000 compliance fee and \$500 in attorney fees incurred by the Commission.
 - c. If any monthly payment is late, an additional \$30 fee shall be due for each month a payment is late.
 - d. Respondents Wyatt and/or Steele will be responsible for all attorney fees and costs incurred by the Commission for breach of this settlement agreement.
6. 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.
7. 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.

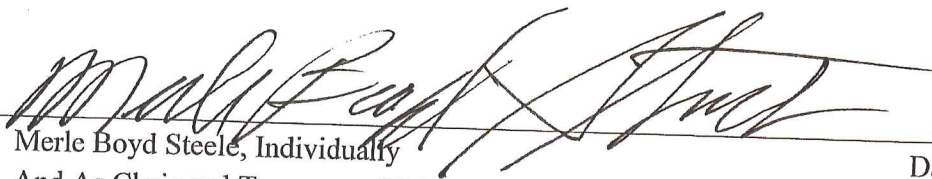
8. This settlement agreement is limited to the facts of this case. This settlement agreement shall not have binding precedential effect for any other matter currently pending before the Commission or that may come before the Commission at a future date.

FOR THE COMMISSION:

By:  _____ Date 6/14/19
Ashley Kemp
Executive Director

FOR THE RESPONDENTS:

By:  _____ Date 5-30-19
Erick Paul Wyatt, Individually and
As Candidate of Erick Wyatt
For State Senate 2018

By:  _____ Date 5-30-19
Merle Boyd Steele, Individually
And As Chair and Treasurer of Erick
Wyatt For State Senate 2018