



OKLAHOMA ETHICS COMMISSION

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

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| In the matter of: |) | |
| |) | |
| Lewis Moore 2016 , a state candidate |) | Ethics Commission |
| committee; Friends of Lewis Moore |) | Case No. 2021-10 |
| 2018 , a state candidate committee; and |) | |
| Lewis Moore , individually and as |) | |
| Candidate, Chairperson, and Treasurer of |) | |
| Lewis Moore 2016 and Friends of Lewis |) | |
| Moore 2018, |) | |
| |) | |
| |) | |
| Respondents. |) | |

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is between the Oklahoma Ethics Commission (“Commission”) and Lewis Moore (“Moore”), personally and in his named capacity as candidate, chair, and treasurer of Lewis Moore 2016 and Friends of Lewis Moore 2018. This Agreement is conditioned on and will become effective upon approval by the Commission and resolves this matter for all Respondents listed in the above-captioned case.

It is hereby agreed by the parties hereto:

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. Moore was a successful candidate for House of Representatives, District 96, in 2016 and 2018 and registered candidate committees Lewis Moore 2016 and Friends of Lewis Moore 2018 (collectively “Committees”).
 - a. Moore, as the candidate, chair, and treasurer for Committees, was required to ensure expenditure of campaign contributions were used exclusively for campaign expenses, officeholder expenses, and other expenses allowed under the Ethics Rules, but not for the personal use of Moore or any other person.


- b. Moore was responsible for ensuring expenditure of Committees' funds were only made via check or debit card.
 - c. Moore was responsible for maintaining committee records sufficient to identify to whom, when, and for what reason expenditures were made, inclusive of, but not limited to, receipts, invoices, payments, mileage logs, and inventory of committee assets.
3. On April 9, 2021, the Commission authorized formal investigation 2021-10 upon finding there was reasonable cause to believe that Respondents violated Campaign Finance Ethics Rule 2.
4. The Commission subpoenaed committee records and, after reviewing the records, issued a Notice of Allegations to Respondents. Respondents timely responded.
5. The Ethics Commission investigation includes alleged violations of Campaign Finance Ethics Rule 2, including those identified below.
 - a. Unlawful and unsubstantiated expenditure of over \$20,000 in campaign funds through electronic transfer from Committees' depository into Moore's personal account.
 - b. Direct expenditure of Committees' funds for goods and services used by Moore for his personal benefit.
 - c. Conversion of Committees' assets to personal assets of Moore, such as phones, laptops, and a printer, without payment to Committees for the assets.
 - d. Respondents failed to maintain and/or produce records for Committees' activity as required by the Ethics Rules, including but not limited to, documentation of mileage claimed as reimbursement on campaign reports, copies of invoices, bills, receipts, service contracts, or similar records.
 - e. Respondents failed to report Committees' activity as required in the Ethics Rules.
6. Moore admits he negligently failed to abide by Oklahoma Campaign Finance Ethics Rule 2 regarding the expenditure of Committees' funds, conversion of Committees' assets to personal assets, and maintenance of Committees' records.

7. To settle the allegations set forth above and otherwise related to Respondents, Moore shall pay to the General Revenue Fund of Oklahoma a lump sum of twelve thousand five hundred dollars (\$12,500) on or before June 15, 2022.
8. Moore shall also provide proof to Commission of the payment of funds pursuant to this Agreement within 5 business days of each payment.
9. Moore agrees that the \$12,500 may be reduced to judgment subject to lien, and that said judgment will be enforceable if the completion of payment is not performed within the time period in this Agreement.
10. Moore agrees that he shall be responsible for any attorney fees and costs incurred by the Commission to enforce this Agreement.
11. The Commission agrees that upon completion of the terms, this Agreement fully satisfies the interests of the Commission in this matter.
12. 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.

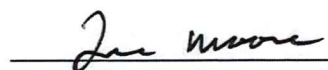
Approved and effective this 8th day of April, 2022.

FOR THE COMMISSION:

RESPONDENT:


Ashley Kemp,
 Executive Director

4/8/2022
 DATE

 3-9-22
Lewis Moore, DATE
 Individually and as Candidate, Chair,
 and Treasurer for Lewis Moore 2016 and
 Friends of Lewis Moore 2018