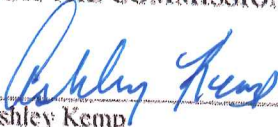


fee for late filing of the committee's 2018 2nd Quarter Contributions and Expenditures Report.

8. Respondents failed to dissolve the committee by the mandatory dissolution date and failed to timely file the following seven reports of contributions and expenditures:
 - 2018 4th Quarter Report
 - 2018 1st Quarter Report
 - 2017 4th Quarter Report
 - 2017 3rd Quarter Report
 - 2017 2nd Quarter Report
 - 2016 Pre-Primary Election Report
 - 2016 Post-General Election Report
9. Respondents' failure to timely dissolve and file the seven reports caused to be issued final compliance orders assessing late fees totaling \$5,600.
10. Respondents have a pending collection action for six of the seven outstanding compliance orders, in the case styled *Oklahoma Ethics Commission v. Hoguen Darrel Apperson, et al.*, Case No. CV-2019-69, in the District Court of Oklahoma County, State of Oklahoma.
11. In order to settle this complaint, investigation, all outstanding late fees due the Commission, and the pending district court action, the Commission agrees to settle the complaint and outstanding late fees owed by Respondents, and dismiss with prejudice the pending district court action in consideration of the following:
 - a. The Commission acknowledges that Respondents have now filed all outstanding reports and dissolved the candidate committee;
 - b. Respondents will pay to the Commission \$1,000 in late fees;
 - c. Respondents will pay attorney fees of \$300 to the Commission; and
 - d. All payments to the Commission due under this agreement will be made within 30 days of the effective date of this agreement.

12. 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.
13. 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.
14. 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:



Ashley Kemp
Executive Director

5/10/2019

Date

FOR THE RESPONDENTS:

By 

Terra Apperson, Treasurer

3-26-19

Date