



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

February 1, 2024

CERTIFIED MAIL AND EMAIL
RETURN RECEIPT REQUESTED

Ronald M. Jacobs, Esq.
Venable LLC
600 Massachusetts Ave., N.W.
Washington, DC 20001
RMJacobs@venable.com

RE: MUR 8174
OkieWay and Steven Martin
in his official capacity as treasurer

Dear Mr. Jacobs:

On January 31, 2024, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of your client, OkieWay and Steven Martin in his official capacity as treasurer (the "Committee"), in settlement of a violation of 52 U.S.C. § 30104(g)(2), provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. *See Disclosure of Certain Documents in Enforcement and Other Matters*, 81 Fed. Reg. 50,702 (Aug. 2, 2016). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. *See* 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1507 or cjacksonjones@fec.gov.

Sincerely,

A handwritten signature in cursive script that reads "Camilla Jackson Jones".

Camilla Jackson Jones
Attorney

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 8174
OkieWay and Steven Martin in his official)	
capacity as treasurer)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that OkieWay and Steven Martin in his official capacity as treasurer (the "Committee" or "Respondent") violated 52 U.S.C. § 30104(g) of the Federal Election Campaign Act of 1971, as amended (the "Act").

NOW, THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over Respondent and the subject matter of this proceeding, and this Agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this Agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The Committee is an independent expenditure-only political committee that registered with the Commission in January 2022.

2. Steven Martin is the treasurer of the Committee.

3. The Act provides that political committees registered with the Commission must file periodic reports disclosing their receipts and disbursements. 52 U.S.C. § 30104(a).

4. An independent expenditure is an expenditure that expressly advocates the election or defeat of a clearly identified federal candidate, and is not made in concert or cooperation with or at the request or suggestion of such candidate, the candidate's authorized political committee, or their agents. 52 U.S.C. § 30101(17); see also 11 C.F.R. § 100.22(a), (b). In addition to a political committee's regular reporting obligations, the Act further requires additional independent expenditure reporting within 24 hours of the expenditure when a person makes or contracts to make independent expenditures aggregating \$1,000 or more after the 20th day but more than 24 hours before the date of an election. 52 U.S.C. § 30104(g); 11 C.F.R. § 109.10(d). Further, a political committee that makes or contracts to make independent expenditures aggregating \$10,000 or more outside of that 20-day period, up to and including the 20th day, must file a report describing those expenditures within 48 hours. 52 U.S.C. § 30104(g)(2); 11 C.F.R. § 104.4(b)(2). These reports must be filed within 48 hours "following the date on which a communication that constitutes an independent expenditure is publicly distributed or otherwise publicly disseminated." 11 C.F.R. § 104.4(b), (c).

5. In 2022, the 20-day period for the Oklahoma special primary election, which was held on June 28, 2022, began on June 8, 2022; thus, an independent expenditure made by a political committee in connection with that election before that date aggregating \$10,000 or more triggered the obligation to file a 48-Hour Report.

6. On May 7, 2022, the Committee made one independent expenditure in the amount of \$344, 875 supporting a single candidate, Lucas Holland, in the Oklahoma Republican

primary election. The Committee did not file a 48-Hour Report for that independent expenditure until after the primary election.

7. On July 15, 2022, the Committee filed its 2022 July Quarterly Report covering the period from April 1, 2022, through June 30, 2022, which included a Schedule E (Itemized Independent Expenditures) disclosing the previously unreported independent expenditure totaling \$344,875. The Committee also filed one untimely 48-Hour Report to support the \$344,875 independent expenditure that it had disseminated on May 7, 2022.

V. The Committee violated 52 U.S.C. § 30104(g) by failing to timely file one 48-Hour Report of Independent Expenditures.

VI. The Committee will take the following actions:

1. The Committee will pay a civil penalty to the Commission in the amount of Five Thousand Dollars (\$5,000), pursuant to 52 U.S.C. § 30109(a)(5)(A). In ordinary circumstances, the Commission would seek a substantially higher civil penalty based on the violations outlined in this Agreement. However, the Commission is taking into account the Committee's representations that it intends to terminate, is defunct, has no cash on hand, and has limited ability to raise additional funds.

2. The Committee will cease and desist from committing violations of 52 U.S.C. § 30104(g).

VII. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this Agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This Agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than 30 days from the date this Agreement becomes effective to comply with and implement the requirements contained in this Agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, 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 in this written Agreement shall be enforceable.

FOR THE COMMISSION:

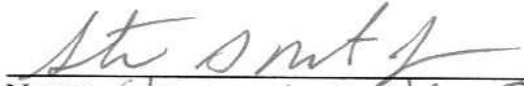
Lisa J. Stevenson
Acting General Counsel

BY: **Charles Kitcher**
Charles Kitcher
Associate General Counsel
for Enforcement

Digitally signed by
Charles Kitcher
Date: 2024.02.01
09:27:17 -05'00'

2/1/24
Date

FOR THE RESPONDENT:


Name: Steven G Martin Sr.
Position: Treasurer

1-11-2024
Date