



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.)
)
 MARINA MANGIARACINA,)
 Individually and as Candidate, Chair,)
 and Treasurer, MARINA)
 MANGIARACINA 2018; and MARINA)
 MANGIARACINA 2018,)
)
 Respondents.)

CASE NO. CV-2019-65,
 In the District Court of Oklahoma County

SETTLEMENT AGREEMENT

The captioned case was filed by the Oklahoma Ethics Commission (“Commission”) on January 10, 2019.

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

1. Respondent enters voluntarily into this agreement with the Commission.
2. On December 2, 2016, Marina Mangiaracina voluntarily registered with the Commission a candidate committee named “Marina Mangiaracina 2018,” naming herself as Candidate, Chair, and Treasurer of the committee.
3. Respondent did not file a declaration of candidacy for the 2018 election.
4. Respondent’s initial registration triggered the obligation to file reports of contributions and expenditures in the Guardian System until she filed a final report and dissolved the committee.

5. Respondent opened a depository account for the Candidate Committee using \$28 of her own funds, and Respondent did not receive any other contributions, monetary or in-kind, for the 2018 election.
6. Respondent dissolved her candidate committee on May 24, 2017, and subsequently closed her bank account because she moved out of the country.
7. Respondent failed to file the following reports of contributions and expenditures:
 - 2017 1st Quarter Report
 - 2017 2nd Quarter Report
 - 2017 3rd Quarter Report
 - 2017 4th Quarter Report
 - 2018 1st Quarter Report
 - 2018 Pre-Primary Report
 - 2018 Pre-Runoff Report
 - 2018 Pre-General Report
 - 2018 Partial Quarter Report
8. Respondent's failure to file the reports incurred a late fee of \$1,000 for each violation for failure to file a report, totaling \$9,000.
9. The parties agree as follows:
 - a. The Commission acknowledges Respondents have now filed all outstanding reports of contributions and expenditures in the Guardian System and dissolved the Candidate Committee.
 - b. Respondents will pay the Commission \$300 in attorney fees within 30 days of the effective date of this agreement.
 - c. Within 30 days of Respondent's payment, pursuant to subparagraph b, the Commission will file a dismissal of its claims against Respondent, with prejudice, in the captioned action.

10. 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.
11. 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.
12. 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: _____

Ashley Kemp
Executive Director

5/10/2019
Date

FOR THE RESPONDENTS:

By: _____

Cara Rodriguez,
Attorney for Respondents

3/18/19
Date