

OCT 03 2024

NEW YORK STATE COMMISSION ON ETHICS
AND LOBBYING IN GOVERNMENT

In the Matter of

Casey Strategic Relations, LLC,

SETTLEMENT AGREEMENT

COELIG Case No. 24-111

Respondent.

1. This settlement agreement is entered into by and between the New York State Commission on Ethics and Lobbying in Government (the "Commission") and Casey Strategic Relations LLC, ("CSR") (the "Respondent").

2. The Commission is the New York State agency responsible for administering and enforcing Article 1-A of the New York State Legislative Law (the "Lobbying Act").

3. This agreement constitutes the entire agreement between the Commission and the Respondent. There are no promises, agreements, or conditions, express or implied, other than those set forth in this document. No modification, deletion, or addition to this agreement will be valid or binding on either party unless put into writing and signed by all parties.

4. This agreement shall become effective upon execution by the Commission, or its designee, and it is understood that this agreement is not confidential and will be made public in accordance with the provisions set forth in Executive Law §§ 94(10)(p)(ii), (11)(b), (12)(a)(iii), and (13)(b), and 19 NYCRR Part 941.16.

5. The Respondent has agreed to resolve this matter in a manner that avoids additional administrative and/or adjudicatory proceedings. As such, the Respondent stipulates to the following facts and conduct:

- a. CSR was engaged by multiple clients to lobby on their behalf during the 2021-2023 biennial registration period (the "Relevant Period").
- b. During the Relevant Period, the Respondent failed to timely file 32 lobbying filings, including statements of registration, registration amendments and lobbyist bi-monthly reports, within the time required by law.
- c. Pursuant to the Lobbying Act §§ 1-e and 1-h, the Commission is authorized to impose a fee not to exceed twenty-five dollars per day for each day that a statement of registration, registration amendment, bimonthly report, is late, and generally imposes late fees according to the fee schedules in 19 N.Y.C.R.R. Part 943.10(g) and 943.11(d).

d. The Respondent was assessed \$29,290 in late fees for the 32 late filings.

6. Respondent agrees, pursuant to Lobbying Act Section 1-o, to pay the Commission the amount of \$10,000 in settlement of the above-described violations.

7. This agreement, and payment, will also satisfy a referral made to the New York State Attorney General's Office on April 18, 2024, for an action to recover \$1,530 in unpaid fees.

8. Respondent has proposed, and the Commission has agreed, to the following conditions for payment:

a. \$2,200 to be paid within 10 business days from the execution of this agreement.

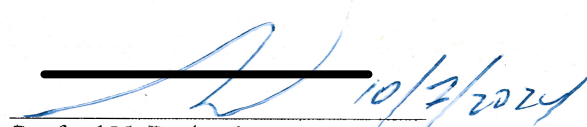
b. \$650 on the first day of each month, beginning November 1, 2024, until the total amount has been paid, no later than November 1, 2025.

9. If the Respondent fails to timely perform any conditions set forth above, Respondent shall be in breach of this agreement. Upon a breach of this agreement, the Commission can either: (i) issue a Notice of Substantial Investigation and Hearing and proceed with an enforcement action; or (ii) deem the Respondent in breach of this agreement and pursue, in court, any other remedy to which the Commission is entitled at law.

10. Respondent agrees not to take any action or to make, permit to be made, authorize, or agree to any public statement denying, directly or indirectly, any finding in this agreement or creating the impression that this agreement is without factual basis.

11. By signing below, Respondent acknowledges reading this agreement in its entirety and understanding all terms and conditions of this agreement, and having done so, knowingly, voluntarily, and freely enters into this agreement. Respondent was not represented by counsel.

Dated: New York, New York
September 27, 2024



Sanford N. Berland
Executive Director
New York State Commission on Ethics
and Lobbying in Government

ACCEPTED AND AGREED TO
THIS ___ DAY OF SEPTEMBER 2024

Respondent - CSR by Glen Casey 