



OKLAHOMA

Ethics Commission



Regular Commission Meeting
August 13, 2026 10:00 AM
OK State Capitol, Rm. G-3



Call to Order



Open Meeting Act Compliance



Introductions & Announcements



Call to Order



Open Meeting Act Compliance



Introductions & Announcements



(4th Congressional District) **Mark Melton** is an attorney and former jurist who serves as Senior Attorney at Echols & Associates. Mark focuses his practice on civil, criminal, probate, and family law. His career is distinguished by a strong commitment to public service and the judiciary. In July 2026, he was appointed to the Ethics Commission by Oklahoma Supreme Court Chief Justice Dustin Rowe, which followed his previous tenure as the Associate District Judge of Murray County, a position he held after being appointed by Governor Kevin Stitt.

Mark's deep roots in the Oklahoma legal community began shortly after his graduation from Oklahoma City University School of Law, where he earned his Juris Doctorate. He initially built his legal foundation practicing in Oklahoma City before returning to his hometown of Davis, Oklahoma, in 2013 to establish the Melton Law Firm.

Outside of the courtroom, Mark is deeply connected to his local community, alongside his wife, Jennie. He is the proud father of three adult sons. His term with the Commission ends July 2031.



OKLAHOMA
Ethics Commission



Announcements, consideration, discussion, and possible action on the disqualification or recusal of any Commissioner or Commissioners pursuant to Ethics Rule 1.6



Consideration, discussion, and possible action on minutes for the regular meeting and executive session held July 9, 2026

Executive Director's Report

Budget

As of August 4, 2026

<u>Business Unit</u>	<u>Class</u>	<u>Dept</u>	<u>Bud Ref</u>	<u>Allocations</u>	<u>Pre Encumbered</u>	<u>Encumbered</u>	<u>Current Yr Exp</u>	<u>Prior Yr Exp</u>	<u>Allotment Budget</u>	<u>Available Cash</u>
29600	195 - General Appropriations (Fiscal Year 2026)									93,789.84
	19502	10	26	1,014,630.00	.00	33,008.00	.00	920,840.16	60,781.84	
				2,029,260.00		33,008.00		1,935,470.16	60,781.84	
	197 - General Appropriations (Fiscal Year 2027)									39,330.98
	19701	10	27	1,337,890.00	.00	60,000.00	71,478.15	.00	1,206,411.85	
	19701	88	27	65,433.00	.00	.00	6,133.87	.00	59,299.13	
				1,403,323.00		60,000.00	77,612.02		1,265,710.98	
	200 - Revolving Fund									738,235.63
	20000	10	27	302,345.00	.00	92,757.50	12,091.08	.00	197,496.42	
	20000	88	27	24,169.00	.00	17,286.99	2,505.23	.00	4,376.78	
				676,717.00		208,148.90	17,514.71	121,586.47	329,466.92	
	210 - Political Subdivisions									205,544.14
	21000	10	26	199,943.00	.00	95,000.00	5,000.00	89,455.86	10,487.14	
	21000	88	26	100,057.00	.00	.00	.00	.00	100,057.00	
				300,000.00		95,000.00	5,000.00	89,455.86	110,544.14	
	211 - Revolving Fund – Specifically for IT/Tech Related Expenses									409,892.59
	21100	10	26	1,500.00	.00	.00	.00	.00	1,500.00	
	21100	88	25	231,540.00	.00	2,007.54	.00	67,641.71	161,890.75	
	21100	88	26	397,495.53	.00	133,883.17	1,693.00	223,512.30	38,407.06	
	21100	88	27	100,000.00	213.75	81,540.48	.00	.00	18,245.77	
				730,535.53	213.75	217,431.19	1,693.00	291,154.01	220,043.58	
	212 - Guardian Replacement Fund									1,197,678.72
	21200	88	25	1,200,000.00	.00	101,542.12	.00	758,884.78	339,573.10	
	21200	88	26	1,015,000.00	.00	296,552.50	1,000.00	242,436.50	475,011.00	
				2,215,000.00		398,094.62	1,000.00	1,001,321.28	814,584.10	
				7,504,835.53	213.75	1,011,682.71	102,819.73	3,588,987.78	2,801,131.56	2,684,471.90



Budget

As of August 4, 2026

General Operations

Department: 1000010 Admin General Operations

Account	Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
511 Salary Expense	1,041,444	86,787	66,500.44	0.00	0.00	66,500.44	974,943.56	20,286.54	6.39	76.62
512 Insur.Prem-Hlth-Life,etc	140,418	11,701	5,476.58	1,500.00	0.00	6,976.58	133,441.42	4,724.91	4.97	59.62
513 FICA-Retirement Contributi	182,761	15,230	11,210.69	0.00	0.00	11,210.69	171,550.31	4,019.34	6.13	73.61
515 Professional Services	224,788	18,732	0.00	114,365.00	0.00	114,365.00	110,423.00	-95,632.69	50.88	610.52
519 Inter/Intra Agy Pmt-Pers S	867	72	0.00	432.00	0.00	432.00	435.00	-359.75	49.83	597.92
521 Travel - Reimbursements	14,600	1,217	381.52	0.00	0.00	381.52	14,218.48	835.10	2.61	31.36
522 Travel - Agency Direct Pmt	7,400	617	0.00	0.00	0.00	0.00	7,400.00	616.65	0.00	0.00
531 Misc. Administrative Expen	20,647	1,721	0.00	11,504.50	0.00	11,504.50	9,142.50	-9,783.96	55.72	668.66
532 Rent Expense	410	34	0.00	0.00	0.00	0.00	410.00	34.16	0.00	0.00
536 General Operating Expenses	6,850	571	0.00	0.00	0.00	0.00	6,850.00	570.82	0.00	0.00
552 Scholar.,Tuition,Incentive	50	4	0.00	0.00	0.00	0.00	50.00	4.16	0.00	0.00
601 AFP Encumbrances	0	0	0.00	24,956.00	0.00	24,956.00	-24,956.00	-24,956.00	~	~
	1,640,235	136,686	83,569.23	152,757.50	0.00	236,326.73	1,403,908.27	-99,640.72	14.41	172.90
Class Funding	Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
19701 GRF-Duties	1,337,890	111,491	71,478.15	60,000.00	0.00	131,478.15	1,206,411.85	-19,987.37	9.83	117.93
20000 Ok Coun Campaign, Eth Rev	302,345	25,195	12,091.08	92,757.50	0.00	104,848.58	197,496.42	-79,653.35	34.68	416.14
	1,640,235	136,686	83,569.23	152,757.50	0.00	236,326.73	1,403,908.27	-99,640.72	14.41	172.90
Totals for Division 10	1,640,235	136,686	83,569.23	152,757.50	0.00	236,326.73	1,403,908.27	-99,640.72	14.41	172.90

Executive Director's Report



Budget IS Services

As of August 4, 2026

Department: 8800020 Administrative IS Services

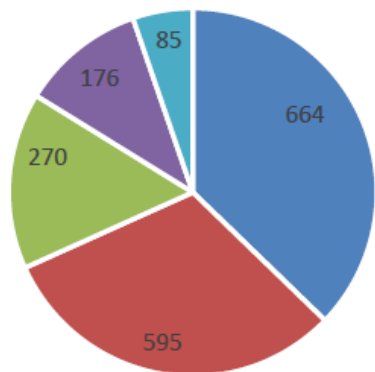
Account	Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
511 Salary Expense	0	0	6,381.05	0.00	0.00	6,381.05	-6,381.05	-6,381.05	~	~
512 Insur.Prem-Hlth-Life,etc	0	0	1,161.58	0.00	0.00	1,161.58	-1,161.58	-1,161.58	~	~
513 FICA-Retirement Contributi	0	0	1,096.47	0.00	0.00	1,096.47	-1,096.47	-1,096.47	~	~
515 Professional Services	53,385	4,449	0.00	0.00	0.00	0.00	53,385.00	4,448.74	0.00	0.00
531 Misc. Administrative Expen	14,869	1,239	0.00	88,261.48	0.00	88,261.48	-73,392.48	-87,022.40	593.59	7123.15
532 Rent Expense	3,350	279	0.00	2,362.99	0.00	2,362.99	987.01	-2,083.83	70.54	846.46
533 Maintenance & Repair Expen	116,148	9,679	0.00	6,703.00	0.00	6,703.00	109,445.00	2,975.99	5.77	69.25
536 General Operating Expenses	350	29	0.00	0.00	213.75	213.75	136.25	-184.59	61.07	733.02
541 Office Furniture & Equipme	1,500	125	0.00	0.00	0.00	0.00	1,500.00	125.00	0.00	0.00
601 AFP Encumbrances	0	0	0.00	1,500.00	0.00	1,500.00	-1,500.00	-1,500.00	~	~
	189,602	15,800	8,639.10	98,827.47	213.75	107,680.32	81,921.68	-91,880.19	56.79	681.52
Class Funding	Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
19701 GRF-Duties	65,433	5,453	6,133.87	0.00	0.00	6,133.87	59,299.13	-681.13	9.37	112.49
20000 Ok Coun Campaign, Eth Rev	24,169	2,014	2,505.23	17,286.99	0.00	19,792.22	4,376.78	-17,778.16	81.89	982.70
21100 Ethics Comm Online Filing	100,000	8,333	0.00	81,540.48	213.75	81,754.23	18,245.77	-73,420.90	81.75	981.05
	189,602	15,800	8,639.10	98,827.47	213.75	107,680.32	81,921.68	-91,880.19	56.79	681.52
Totals for Division 88	189,602	15,800	8,639.10	98,827.47	213.75	107,680.32	81,921.68	-91,880.19	56.79	681.52
Totals for Bus Unit 29600	1,829,837	152,486	92,208.33	251,584.97	213.75	344,007.05	1,485,829.95	-191,520.91	18.80	225.60

Compliance Report

THE GUARDIAN SYSTEM REGISTRANTS

Active Filers as of June 30, 2026

Active Filers July 2026



- Lobbyist 37%
- Candidates 31%
- Political Action 16%
- Special Function 11%
- Political Party 5%

Changes since last month:

Lobbyists	-1
Candidates	+0
Other Committees	+5

Changes since same month last year:

Lobbyists	-12
Candidates	+322
Other Committees	+19

Total Guardian Filers: 1790

Executive Summary Dashboard

Metric:	July 2026	Prior Month	Trend
Total Active Filers	1790	1786	0.0%
Committee Filing Compliance	93%	94%	-1.0%
Lobbyist Filing Compliance	98%	98%	0.0%
Reports Reviewed	191	332	-42.5%
Compliance Orders Issued	38	59	-36.0%
Political Subdivision Filings Screened	106	222	-52.0%

Filing Compliance Rates and Trends

Scheduled Report:	Expected	Filed on Time	Compliance Rate	Trend Month
Legislative/Executive Lobbyist 2026 June Report and Executive Only Lobbyist 2026 2 nd Quarter Report Due 7/15/26	672	661	98%	+0.0%
2026 2 nd Quarter Report (non-2026 Candidates / PAC / Party) Due 7/31/26	384	354	92%	-2.0%



OKLAHOMA
Ethics Commission

Compliance Report

Public Assistance & Education Metrics

Compliance Assistance Delivered:	July 2026	Prior Month	Trend Month	Trend Year
Phone calls and Walk-Ins	247	342	-95	+22
Emails answered	249	635	-386	-227
Reports reviewed	191	519	-328	-101
Political Subdivision filings screened	106	222	-116	N/A
Education sessions conducted	7	11	-4	-1
Total Public Interactions	797	1729	-932	-204

Compliance officers assisted almost 800 filers and public officials during July, while continuing review and enforcement responsibilities.

Enforcement Activity

Proposed/Final Orders Issued:	July 2026	Prior Month	Trend Month	Trend Year
Lobbyist Proposed Orders	11	15	-4	-6
Lobbyist Final Orders	3	4	-1	+2
Candidate/Committee Proposed Orders	16	23	-7	+13
Candidate/Committee Final Orders	8	17	-9	-8

Compliance Report

Political Subdivision Implementation Progress

Metric:	July 2026	Prior Month	Trend Month
Political Subdivision PFD Filings	29	79	-50
Political Subdivision Statements of Organization	7	26	-19
Political Subdivision Campaign Finance Reports	70	117	-47

The Commission processed 106 Political Subdivision filings during July, and 222 Political Subdivision Filings during June. This number is declining, as expected, due to Guardian system availability and the completion of the annual filing period for Personal Financial Disclosures.

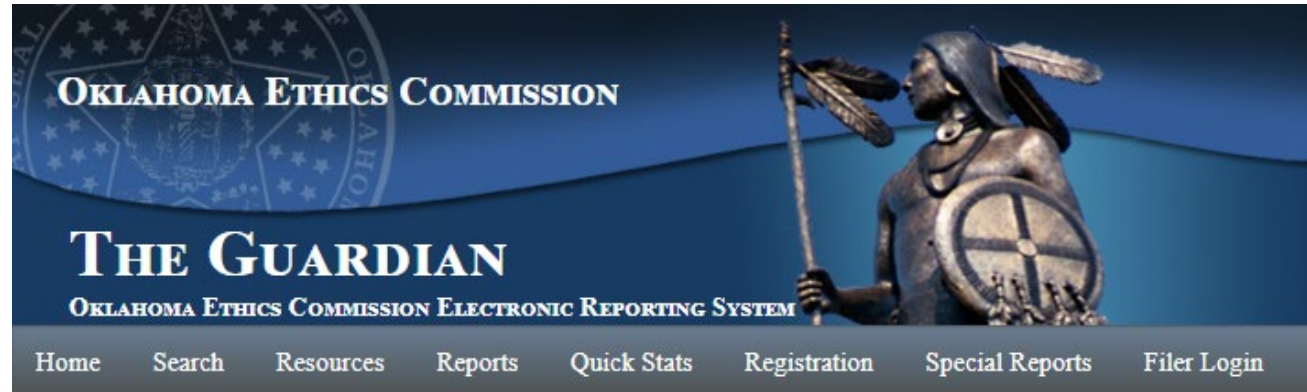
Upcoming Compliance Deadlines

Scheduled Report:	Due Date	Number Expected
2026 Pre-Primary Report (2026 Candidates)	8/17/26	519
Executive Only Lobbyist 3 rd Quarter Report	10/15/26	19
2026 Pre-General Report (2026 Candidates)	10/26/26	488

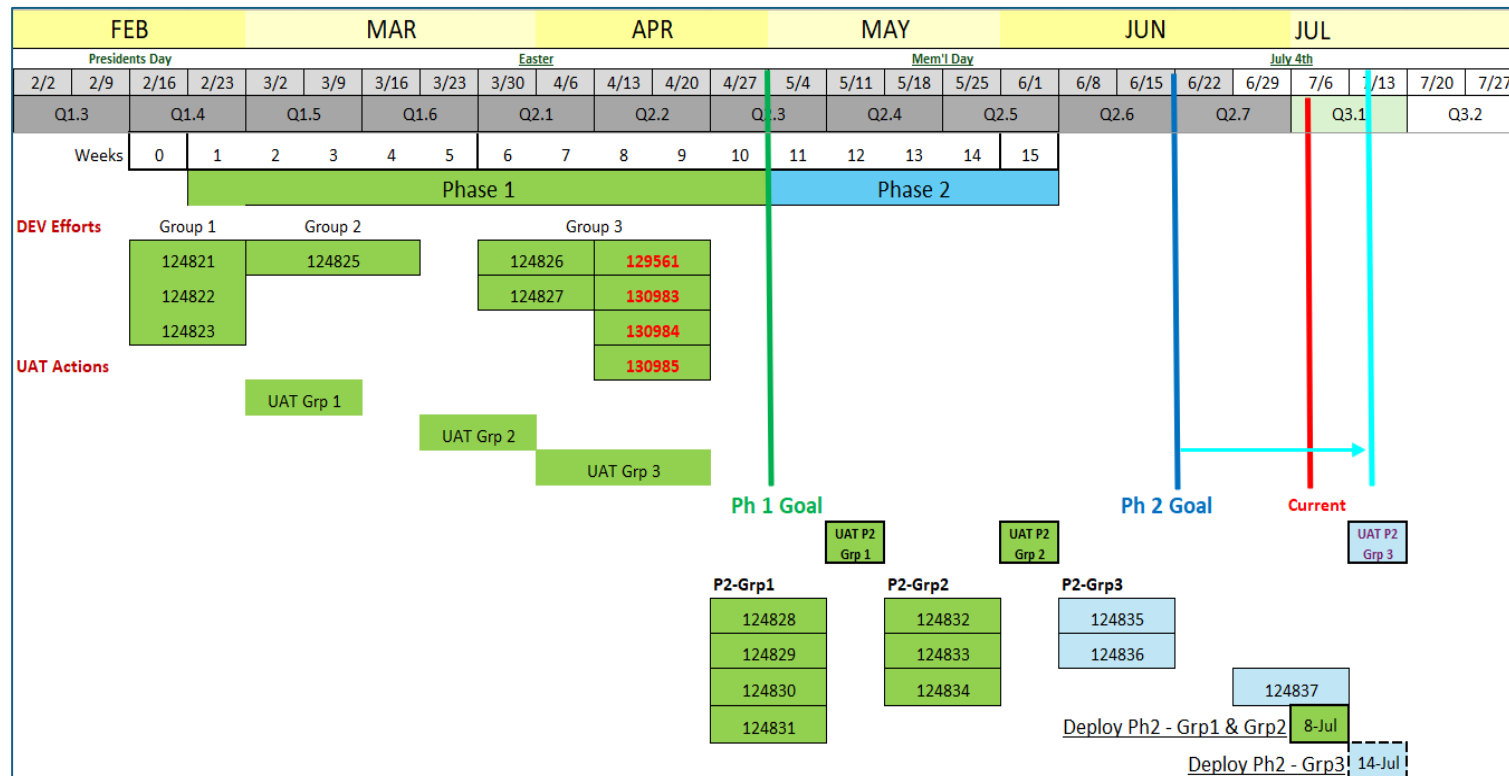
Education Report

- **8/14/2026: Oklahoma State School Board Association Conference**
- **8/17/2026: Midwest City Rotary Club**
- **8/25/2026: Oklahoma Arts Council**
- **9/2/2026: OMES Legal Division**
- **9/15-17/2026: Oklahoma Municipal League Conference**
- **9/21/2026: Government & Administrative Law Practice Section Continuing Legal Education**

Guardian & Political Subdivision Update



Civix Phase 2
Completed



Guardian & Political Subdivision Update

Technology-Assisted Campaign Finance Report Review Procedures, including compliance officer verification and quality assurance sampling measures



Combine deterministic + AI analysis for consolidated viewing



Generate priority scores



Summarize by report, schedule, and flags



Highlight high-risk transactions

Current state:

- PDFs are bulk generated and stored locally for analysis
- Analysis progress tracked manually by staff via excel file

Proposed state:

- Monthly/Report based bulk analysis cycle
- Solution queries vendor issued data from Guardian instead of generated PDF reports
- Web-hosted analytics and workflow dashboard

Guardian & Political Subdivision Update



 **Candor/HONEYMOON**
Multi-Channel Campaign

- ▶ built statewide awareness of changes in Ethics Commission requirements
- ▶ moved audiences to access OEC resources and information.

OEC Compliance Review

Review submitted filings, approve for public access, or return for corrections

7
Pending Review

575
Approved (Public)

1664
Approved (Private)

1449
Returned



Raise or Spend Over \$1,000 on Your Campaign?

▶ **Register with the Ethics Commission**

Candidates for county, municipal, school board and tech center office — heads up! If you raise or spend over \$1,000 on your campaign — yes, even your own funds — you need to register with the Ethics Commission. All elected officials also must register to file personal financial disclosures.



Visit EthicsOK.com to file today

19,697

Paid Media Clicks

8.04m

Paid Media Impressions

40,011

Website Visits

28,970

Unique Visitors



Oklahoma Ethics Commission

Local Campaign Finance Transparency Portal

Search Registrations and Forms

Search registrations and forms submitted to the Oklahoma Ethics Commission within this system. All data shown has been screened for public access.

575
Public Filings

\$2,223,022.35
Total Contributions

\$1,337,109.2
Total Expenditures

Public Service Announcement Campaign



Public Service Announcement Campaign



June 2026 Summary Report

Current Campaigns	# of Spots June 2026	Value June 2026	Contract Total to Date
Election Transparency	3,054	\$75,616	\$75,616

CITY	STATIONS (TV & Radio)	# of SPOTS IN JUNE	VALUE TO DATE
ADA	10	660	\$19,429
BARTLESVILLE	1	381	\$8,001
HUGO	2	215	\$5,269
MCALISTER	1	104	\$3,120
OKLAHOMA CITY	22	1,103	\$26,870
WOODWARD	2	120	\$3,720

Public Service Announcement Campaign

Media Description: PSA OAB Ethics Commission 30 Transparency 2									
8760753	KOCB	93451	6/12/26	1:54:55 pm	PSA OAB Ethics Commission 30 Transparency 2	PSA Ethics Commission 30 Transparency 1	:30	5/31/27	Sherri
8760753	KOCB	93451	6/12/26	3:11:50 pm	PSA OAB Ethics Commission 30 Transparency 2	PSA Ethics Commission 30 Transparency 1	:30	5/31/27	TMZ Live
8760753	KOCB	93451	6/12/26	4:21:41 pm	PSA OAB Ethics Commission 30 Transparency 2	PSA Ethics Commission 30 Transparency 1	:30	5/31/27	TMZ 2
8760753	KOCB	93451	6/12/26	5:40:10 pm	PSA OAB Ethics Commission 30 Transparency 2	PSA Ethics Commission 30 Transparency 1	:30	5/31/27	News-FOX 25 530p News
8760753	KOCB	93451	6/12/26	7:22:00 pm	PSA OAB Ethics Commission 30 Transparency 2	PSA Ethics Commission 30 Transparency 1	:30	5/31/27	News-The National News Desk 3
8760753	KOCB	93451	6/12/26	8:21:32 pm	PSA OAB Ethics Commission 30 Transparency 2	PSA Ethics Commission 30 Transparency 1	:30	5/31/27	Family Feud 6
8760753	KOCB	93451	6/12/26	9:20:43 pm	PSA OAB Ethics Commission 30 Transparency 2	PSA Ethics Commission 30 Transparency 1	:30	5/31/27	News-FOX Primetime News @ 9
8760753	KOCB	93451	6/12/26	10:40:20 pm	PSA OAB Ethics Commission 30 Transparency 2	PSA Ethics Commission 30 Transparency 1	:30	5/31/27	News-The National News Desk LF 2

KOCO

Description: 5:00a-5XM, DNU

#	Day	Date	Time	Length	Rate	Copy
4	M	06/22/26	12:14 A	30	\$0.00	OKETHICSCOMM30226
4	M	06/22/26	04:46 A	30	\$0.00	OKETHICSCOMM30126
4	Tu	06/23/26	03:48 A	30	\$0.00	OKETHICSCOMM30226
4	Tu	06/23/26	04:39 A	30	\$0.00	OKETHICSCOMM30126
4	W	06/24/26	12:53 A	30	\$0.00	OKETHICSCOMM30126
4	W	06/24/26	02:57 P	30	\$0.00	OKETHICSCOMM30226
4	Th	06/25/26	02:02 A	30	\$0.00	OKETHICSCOMM30226
4	F	06/26/26	01:54 A	30	\$0.00	OKETHICSCOMM30126
4	Sa	06/27/26	02:28 A	30	\$0.00	OKETHICSCOMM30126
4	Sa	06/27/26	10:23 P	30	\$0.00	OKETHICSCOMM30226
4	Su	06/28/26	03:57 P	30	\$0.00	OKETHICSCOMM30226
4	Su	06/28/26	10:54 P	30	\$0.00	OKETHICSCOMM30126

KTEN

Description: M-Su, 5a-5a

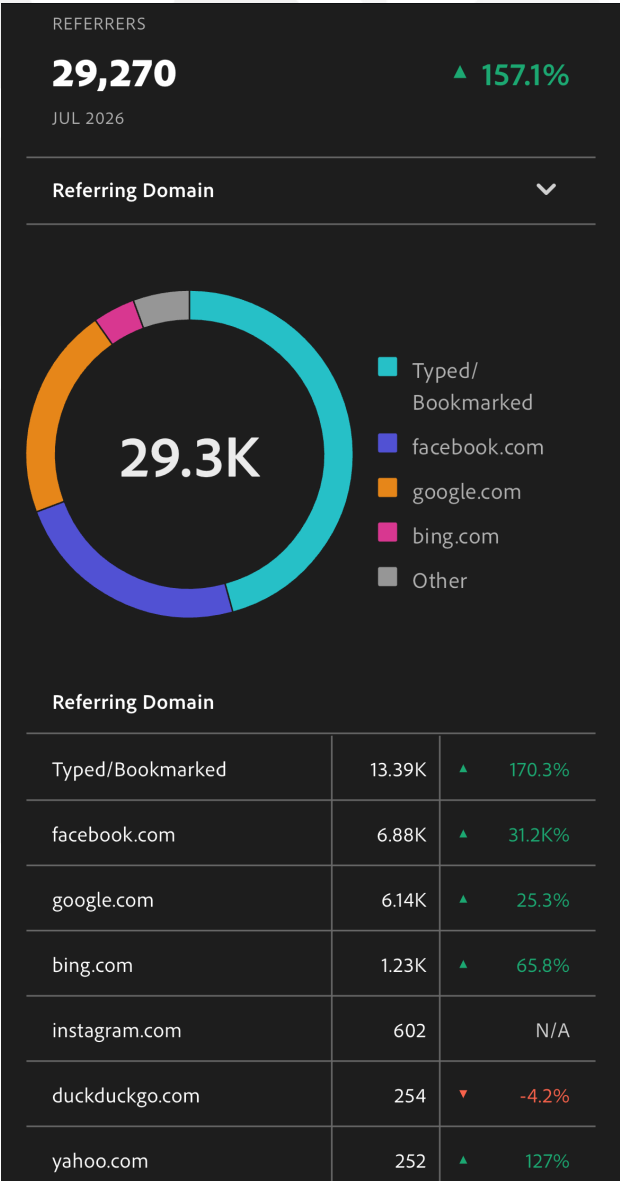
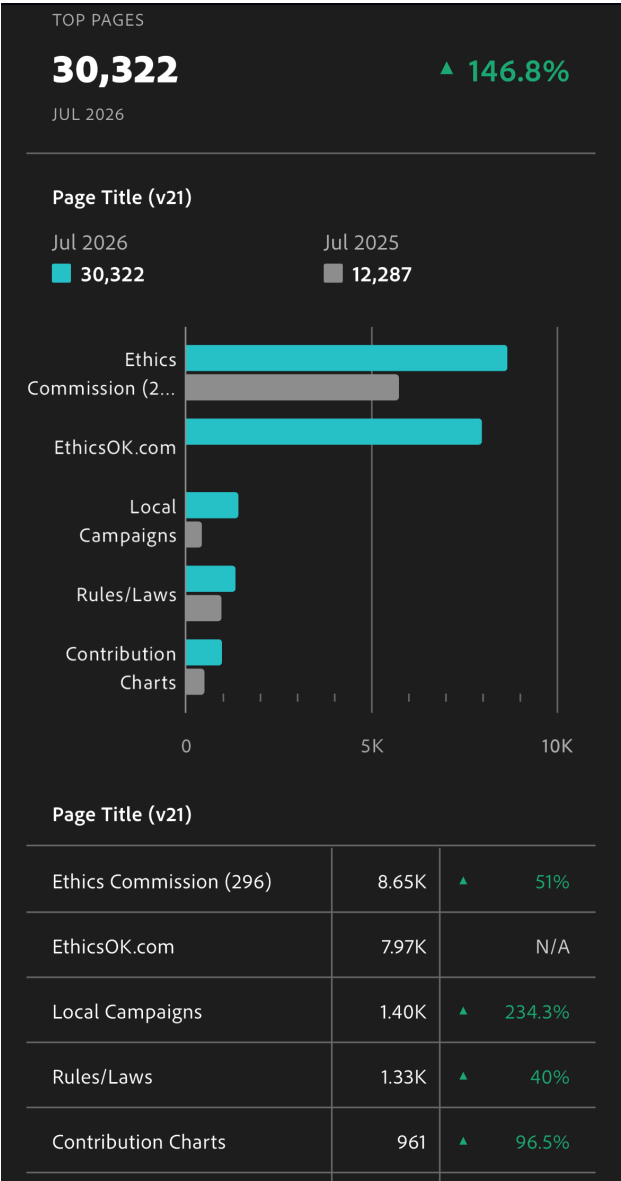
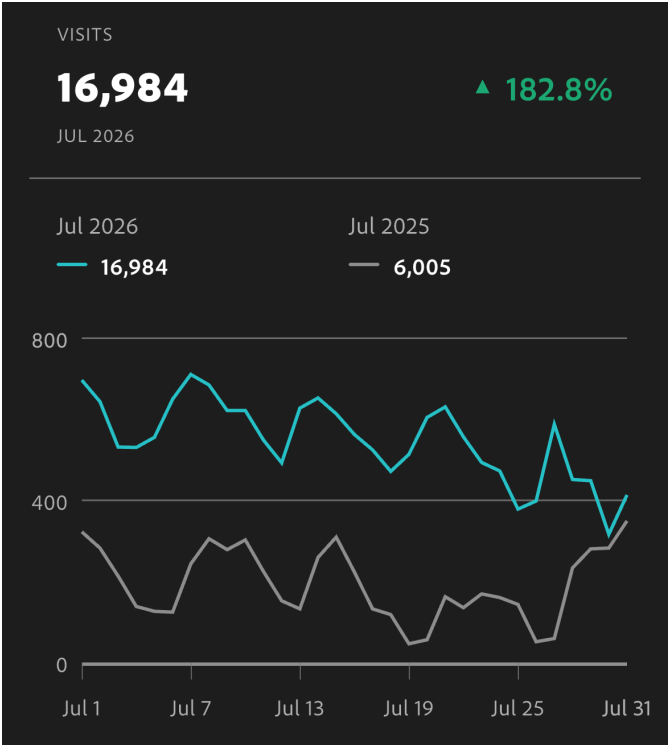
#	Day	Date	Time	Length
2	M	06/08/26	01:30 P	30
2	M	06/08/26	04:55 P	30
2	Tu	06/09/26	02:00 P	30
2	W	06/10/26	04:25 P	30
2	Th	06/11/26	11:47 A	30
2	Th	06/11/26	10:53 P	30
2	Sa	06/13/26	03:47 P	30
2	Sa	06/13/26	11:19 P	30
2	Su	06/14/26	12:12 P	30
2	Su	06/14/26	02:23 P	30

Day	Date	Length	Air Time	Ad-ID
KFOR				
W	06/17/26	:30	1:47 AM	OKETHICSCOMMISSION2
W	06/17/26	:30	2:49 AM	OKETHICSCOMMISSION1
Th	06/18/26	:00		
Th	06/18/26	:30	3:43 AM	OKETHICSCOMMISSION2
F	06/19/26	:30	5:45 AM	OKETHICSCOMMISSION1
Sa	06/20/26	:30	6:50 AM	OKETHICSCOMMISSION2
Sa	06/20/26	:30	9:45 AM	OKETHICSCOMMISSION1
Su	06/21/26	:30	12:47 PM	OKETHICSCOMMISSION2
Su	06/21/26	:30	2:40 AM	OKETHICSCOMMISSION1
06/22/26 to 06/28/26		15x	MTWTFSS	
M	06/22/26	:30	7:50 AM	OKETHICSCOMMISSION2
M	06/22/26	:30	2:47 PM	OKETHICSCOMMISSION1
M	06/22/26	:30	6:48 PM	OKETHICSCOMMISSION2
Tu	06/23/26	:30	8:43 PM	OKETHICSCOMMISSION1
Tu	06/23/26	:30	11:45 PM	OKETHICSCOMMISSION2
W	06/24/26	:30	4:42 AM	OKETHICSCOMMISSION1
W	06/24/26	:30	9:43 PM	OKETHICSCOMMISSION2
Th	06/25/26	:30	5:44 PM	OKETHICSCOMMISSION1
Th	06/25/26	:30	10:46 PM	OKETHICSCOMMISSION2
F	06/26/26	:30	1:42 AM	OKETHICSCOMMISSION1
Sa	06/27/26	:30	5:43 AM	OKETHICSCOMMISSION2
Sa	06/27/26	:30	6:45 AM	OKETHICSCOMMISSION1
Sa	06/27/26	:30	12:50 PM	OKETHICSCOMMISSION2
				OKETHICSCOMMISSION1



Public Service Announcement Campaign

July 2025 vs. July 2026



Confidentiality Discussion & Update

Commissioners may become aware of information through their service that is not yet—and in some circumstances may never become—public. That can include information about complaints, investigations, potential violations, legal advice, personnel matters, or other matters the Commission is permitted or required to consider confidentially.

- **Rule 6.9. Confidentiality of Complaint or Investigation.** Unless the Commission determines that a complaint or a formal investigation should be made public, **all complaints and formal investigations, including documents and discussions in executive session, shall remain confidential and shall not be disclosed by a Commissioner, by the Commission or by its employees except to the extent necessary to facilitate or conduct a preliminary inquiry or a formal investigation.** However, the Executive Director may confirm or deny the existence of a complaint or formal investigation alleging a violation of these Rules by any individual upon the written request of that individual. A settlement agreement executed under these Rules shall be public record. The Commission may make a complaint or formal investigation and any documents relating thereto public at any time it deems release of that information to be in the public interest.

Confidentiality Discussion & Update

Confidentiality serves an important purpose. The existence of an allegation does not mean a violation occurred. Protecting information while the appropriate process takes place protects the integrity of our work, the fairness of the proceeding, and the reputations of everyone involved.

A useful rule of thumb is this: if you learned something because you are a Commissioner, rather than because it is part of the public record, don't assume it can be shared outside the Commission.

This includes informal conversations with friends, colleagues, public officials, members of the regulated community, or the media. And if there is ever uncertainty about whether something is public, the best course is simply to ask staff before discussing it.

Confidentiality isn't about secrecy for secrecy's sake. It is about protecting a fair and trustworthy process.



Confidentiality Discussion & Update

CONFIDENTIALITY: PROTECTING THE PROCESS

Before sharing information, ask:

- Is this already part of the public record?
- Did I learn this only because I am a Commissioner?
- Could disclosure affect a pending matter or an individual?
- If I'm unsure, have I asked staff?

*As a Commissioner you may be approached by the media – feel free to forward that inquiry to the Executive Director.

When in doubt: Ask before sharing.

Legislative and Advisory Groups

➤ August/September meetings set with Groups

Topics to Discuss

➤ Rule Amendments/Proposals

➤ Strategic Planning (Advisory Group only)

➤ Dark Money

➤ Artificial Intelligence in Campaigns



OKLAHOMA
Ethics Commission

Distinguishing Authentic Material From Fabricated Content

January 2024

- 6 states had laws addressing the use of AI in campaigns

Summer of 2026

- 31 States

Most Popular Approach (28 States): **Requiring Disclosures**

- Who paid for a Political Ad
- Stating the Ad contains Artificial/Synthetic Media

Disclosure Requirements

- Most of the recent litigation challenges bans on AI-generated political speech, not disclosure requirements
- Campaign finance law already contains many examples of required disclosures requiring an effort to influence a voter:
 - ("Paid for by..." disclaimers, donor reporting, expenditure reporting)
- Courts have often recognized that these requirements further the government's interest in informing voters without preventing speech (transparency v censorship)

Why are many states choosing Disclosure?

- Preserve political speech while increasing transparency.
- Help voters evaluate campaign communications.
- Fit within existing campaign finance and disclaimer frameworks.
- May present fewer First Amendment concerns than outright bans or criminal penalties.

Emerging Issues: Artificial Intelligence

STATE	WHAT MUST BE DISCLOSED	LIABILITY	WHO ENFORCES
Washington	A.I.-generated or manipulated political ads must include a disclosure	Civil	Public Disclosure Commission
Michigan	Disclosure required for materially deceptive A.I. media in campaign ads	Civil & Criminal	Secretary of State/Attorney General
Wisconsin	Disclosure on materially altered political ads	Civil	State Election Authorities
Oregon	Disclosure of synthetic media used in political communications	Civil	Secretary of State
Utah	Disclosure requirements for A.I.-generated political ads	Civil	State Election Officials

Washington Approach

- Instead of making AI-generated Political Ads illegal, it creates a civil remedy if someone distributes synthetic media without the required disclosure.
- If the disclosure is present, that serves as an affirmative defense.
- Helps voters evaluate campaign communications
- **Legal Challenges**
 - Has certainly seen litigation over campaign transparency laws, but those cases have generally involved disclosure obligations imposed on platforms or advertisers—not constitutional attacks on the synthetic-media disclosure concept itself.
 - Washington successfully defended its longstanding political advertising transparency requirements against Meta, with the Washington Supreme Court upholding enforcement of those disclosure obligations.

Questions to ask:

- When should disclosure be required?
 - Only AI use? Only materially altered content? Only audio/video? Include still photographs/mailers? Include text messages?

- What should the disclosure say?
 - This advertisement contains AI-generated content.
or
 - This image has been digitally altered using artificial intelligence.
or
 - Synthetic media was used in creating portions of this communication.

*Note: Colorado & Utah require additional disclosures in the meta data — descriptive information about a file's creator, when the file was created & when the file was edited. Some states only require this when within a certain number of days prior to an election – like electioneering rules.

Questions to ask:

- Where should the disclosure appear?
 - On-screen? Spoken aloud? Written disclaimer? Social media caption? End of printed mailer/advertisement?
- What communications should be covered?
 - Social media? TV/Radio? Mail? Websites? Text messages?
- Should there be exemptions?
 - Obvious parody or satire? Memes? News reporting? Candidate debate clips? Volunteer-created content?

Next Month:

- **Constitutional and Implementation Issues**
 - What legal & practical considerations should the Oklahoma Ethics Commission weigh before proposing any rule (or legislation)?



OKLAHOMA

Ethics Commission



Regular Commission Meeting
August 13, 2026, 10:00 AM
OK State Capitol, Rm. G-3



Executive Session



OKLAHOMA

Ethics Commission



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Returning Soon From
Executive Session



OKLAHOMA

Ethics Commission



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Possible Action Following Executive Session

**Case No. 2026-13,
alleging violations of Campaign
Finance Rule 2.**

**Case No. 2026-09,
alleging violations of Campaign
Finance Rule 2.**

C-26-04

C-26-15

C-26-18

C-26-19

C-26-20

C-26-21

No Action On:
C-26-18



OKLAHOMA
Ethics Commission



New Business



Adjournment



Next Regularly Scheduled Commission Meeting September 10, 2026 @10:00 a.m. OK State Capitol, Rm. G-3

2026 Regularly scheduled Ethics Commission Meetings

Start Time: 10:00am

Location: Oklahoma State Capitol, Rm. G-3

~~Thursday, January 15, 2026~~

~~Thursday, February 12, 2026~~

~~Thursday, March 12, 2026~~

~~Thursday, April 9, 2026~~

~~Thursday, May 14, 2026~~

~~Thursday, June 5, 2026~~

~~Thursday, July 9, 2026~~

~~Thursday, August 13, 2026~~

Thursday, September 10, 2026

Thursday, October 8, 2026

Thursday, November 12, 2026

Thursday, December 3, 2026



OKLAHOMA
Ethics Commission