



# OKLAHOMA

## Ethics Commission



Commission Meeting  
February 12, 2026 10:00 AM  
OK State Capitol, Rm. G-3



**OKLAHOMA**  
Ethics Commission



**Call to Order**



**Open Meeting Act Compliance**



**Introductions & Announcements**



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



**OKLAHOMA**  
Ethics Commission



**Consideration, discussion, and possible action on minutes for the regular meeting and executive session held January 12, 2026**



**Introduction and explanation of a rulemaking request submitted by Representative Meloyde Blancett regarding regulation and disclosures of independent political expenditures.**

**Introduction and explanation  
of a rulemaking request  
submitted by Representative  
Meloyde Blancett regarding  
regulation and disclosures  
of independent political  
expenditures.**



# Executive Director's Report



# Budget

As of February 3, 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									473,969.34
	19501	10	25	1,014,630.00	.00	.00	.00	1,014,630.00	.00	
	19502	10	26	1,014,630.00	.00	225.00	540,660.66	.00	473,744.34	
				<u>2,029,260.00</u>		<u>225.00</u>	<u>540,660.66</u>	<u>1,014,630.00</u>	<u>473,744.34</u>	
	200 - Revolving Fund									715,469.10
	20000	10	24	178,006.00	.00	41,501.74	.00	39,454.75	97,049.51	
	20000	10	25	277,481.00	.00	79,277.00	6,265.19	68,519.16	123,419.65	
	20000	10	26	72,722.00	.00	43,525.07	23,177.43	.00	6,019.50	
				<u>528,209.00</u>		<u>164,303.81</u>	<u>29,442.62</u>	<u>107,973.91</u>	<u>226,488.66</u>	
	210 - Political Subdivisions									240,614.98
	21000	10	26	199,943.00	.00	100,000.00	59,385.02	.00	40,557.98	
	21000	88	26	100,057.00	.00	.00	.00	.00	100,057.00	
				<u>300,000.00</u>		<u>100,000.00</u>	<u>59,385.02</u>		<u>140,614.98</u>	
	211 - Revolving Fund – Specifically for IT/Tech Related Expenses									344,697.19
	21100	10	26	1,500.00	.00	.00	.00	.00	1,500.00	
	21100	88	24	164,186.00	.00	3,995.66	.00	76,129.56	84,060.78	
	21100	88	25	231,540.00	.00	2,007.54	7,018.45	60,623.26	161,890.75	
	21100	88	26	397,495.53	.00	102,926.91	90,400.70	.00	204,167.92	
				<u>794,721.53</u>		<u>108,930.11</u>	<u>97,419.15</u>	<u>136,752.82</u>	<u>451,619.45</u>	
	212 - Guardian Replacement Fund									1,199,318.72
	21200	88	25	1,200,000.00	.00	101,542.12	214,494.78	544,390.00	339,573.10	
	21200	88	26	1,015,000.00	.00	297,192.50	241,796.50	.00	476,011.00	
				<u>2,215,000.00</u>		<u>398,734.62</u>	<u>456,291.28</u>	<u>544,390.00</u>	<u>815,584.10</u>	
	<b>Grand Totals</b>			<u>6,705,147.53</u>	<u>-</u>	<u>772,193.54</u>	<u>1,258,198.73</u>	<u>2,566,703.73</u>	<u>2,108,051.53</u>	<u>2,974,069.33</u>



# Budget

As of February 3, 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	834,382	486,723	410,801.47	0.00	0.00	410,801.47	423,580.53	75,921.34	49.23	84.40
512 Insur.Prem-Hlth-Life,etc	147,054	85,782	39,268.61	1,139.88	0.00	40,408.49	106,645.51	45,373.01	27.48	47.11
513 FICA-Retirement Contributi	196,200	114,450	96,817.78	0.00	0.00	96,817.78	99,382.22	17,632.08	49.35	84.59
515 Professional Services	65,687	38,317	63,395.66	118,313.90	0.00	181,709.56	-116,022.56	-143,392.40	276.63	474.23
519 Inter/Intra Agy Pmt-Pers S	432	252	388.50	43.50	0.00	432.00	0.00	-180.00	100.00	171.43
521 Travel - Reimbursements	14,600	8,516	3,942.94	0.00	0.00	3,942.94	10,657.06	4,573.47	27.01	46.30
522 Travel - Agency Direct Pmt	7,400	4,317	781.25	0.00	0.00	781.25	6,618.75	3,535.30	10.56	18.10
531 Misc. Administrative Expen	16,415	9,575	5,136.31	9,568.39	0.00	14,704.70	1,710.30	-5,129.54	89.58	153.57
532 Rent Expense	700	408	822.28	0.00	0.00	822.28	-122.28	-414.04	117.47	201.42
534 Specialized Sup & Mat.Expe	0	0	438.38	0.00	0.00	438.38	-438.38	-438.38	~	~
536 General Operating Expenses	5,900	3,442	1,396.40	0.00	0.00	1,396.40	4,503.60	2,045.15	23.67	40.57
552 Scholar., Tuition, Incentive	25	15	33.53	0.00	0.00	33.53	-8.53	-18.97	134.12	230.29
601 AFP Encumbrances	0	0	0.00	14,684.40	0.00	14,684.40	-14,684.40	-14,684.40	~	~
810 Req Only	0	0	0.00	162,299.80	0.00	162,299.80	-162,299.80	-162,299.80	~	~
	1,288,795	751,796	623,223.11	306,049.87	0.00	929,272.98	359,522.02	-177,477.18	72.10	123.61
Class Funding	Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
19502 GRF Duties	1,014,630	591,867	540,660.66	225.00	0.00	540,885.66	473,744.34	50,981.63	53.31	91.39
19601 GRF-Duties	0	0	0.00	57.00	0.00	57.00	-57.00	-57.00	~	~
20000 Ok Coun Campaign, Eth Rev	72,722	42,420	23,177.43	205,767.87	0.00	228,945.30	-156,223.30	-186,525.16	314.82	539.71
21000 Political Subdiv Enforcemt	199,943	116,633	59,385.02	100,000.00	0.00	159,385.02	40,557.98	-42,751.65	79.72	136.65
21100 Ethics Comm Online Filing	1,500	875	0.00	0.00	0.00	0.00	1,500.00	875.00	0.00	0.00
	1,288,795	751,796	623,223.11	306,049.87	0.00	929,272.98	359,522.02	-177,477.18	72.10	123.61
Totals for Division 10	1,288,795	751,796	623,223.11	306,049.87	0.00	929,272.98	359,522.02	-177,477.18	72.10	123.61

# Executive Director's Report



# Budget

As of February 3, 2026

# IS Services

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	71,062	41,453	43,660.52	0.00	0.00	43,660.52	27,401.48	-2,207.71	61.44	105.33
512 Insur. Prem-Hlth-Life, etc	14,820	8,645	7,919.08	0.00	0.00	7,919.08	6,900.92	725.92	53.44	91.60
513 FICA-Retirement Contributi	17,524	10,222	10,424.77	0.00	0.00	10,424.77	7,099.23	-202.53	59.49	101.98
515 Professional Services	988,513	576,632	226,280.06	315,100.06	0.00	541,380.12	447,132.41	35,252.09	54.77	93.89
531 Misc. Administrative Expen	296,434	172,920	7,864.27	5,377.32	0.00	13,241.59	283,192.41	159,678.15	4.47	7.66
532 Rent Expense	3,500	2,042	2,229.75	864.48	0.00	3,094.23	405.77	-1,052.61	88.41	151.56
533 Maintenance & Repair Expen	117,100	68,308	33,439.65	10,255.60	0.00	43,695.25	73,404.75	24,613.06	37.31	63.97
535 Production, Safety, Security	0	0	34.29	0.00	0.00	34.29	-34.29	-34.29	~	~
536 General Operating Expenses	0	0	344.81	414.00	0.00	758.81	-758.81	-758.81	~	~
541 Office Furniture & Equipme	3,600	2,100	0.00	67,410.00	0.00	67,410.00	-63,810.00	-65,310.00	1872.50	3210.00
601 AFP Encumbrances	0	0	0.00	697.95	0.00	697.95	-697.95	-697.95	~	~
810 Req Only	0	0	0.00	0.00	12,819.90	12,819.90	-12,819.90	-12,819.90	~	~
	1,512,553	882,322	332,197.20	400,119.41	12,819.90	745,136.51	767,416.02	137,185.42	49.26	84.45
Class Funding	Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
20000 Ok Coun Campaign, Eth Rev	0	0	0.00	0.00	12,819.90	12,819.90	-12,819.90	-12,819.90	~	~
21000 Political Subdiv Enforcemt	100,057	58,367	0.00	0.00	0.00	0.00	100,057.00	58,366.56	0.00	0.00
21100 Ethics Comm Online Filing	397,496	231,872	90,400.70	102,926.91	0.00	193,327.61	204,167.92	38,544.52	48.64	83.38
21200 Ethics Com Fil Sys Replcmn	1,015,000	592,083	241,796.50	297,192.50	0.00	538,989.00	476,011.00	53,094.24	53.10	91.03
	1,512,553	882,322	332,197.20	400,119.41	12,819.90	745,136.51	767,416.02	137,185.42	49.26	84.45
Totals for Division 88	1,512,553	882,322	332,197.20	400,119.41	12,819.90	745,136.51	767,416.02	137,185.42	49.26	84.45
Totals for Bus Unit 29600	2,801,348	1,634,118	955,420.31	706,169.28	12,819.90	1,674,409.49	1,126,938.04	-40,291.76	59.77	102.47

# Legislative Update



- **SB 2180 (Daniels)** Creates Foreign Agent Political Activity Oversight Act which requires Foreign Country Agent to register with the Secretary of State
- **SB 660 (Guthrie & Bergstrom)** Creates the Foreign Agents Registration Act which imposes certain transparency, notice and activity requirements on persons identified as agents representing principals from foreign countries of concern. (Guthrie & Bergstrom)
- **ERA 2025-06 Modification of Ethics Rule 5.3** : Adding provision for Lobbyist disclosure of “Countries of Particular Concern”

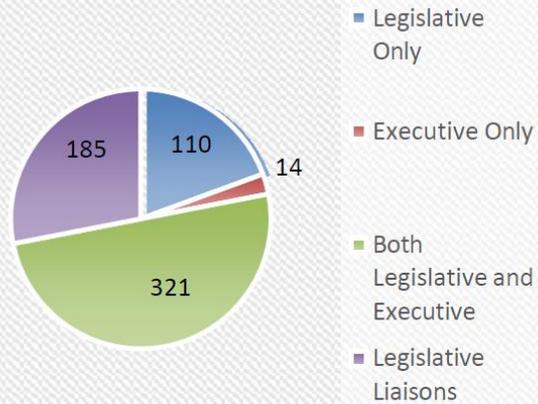
## **Annual Registration for Legislative Liaison and Legislative Lobbyist is amended to read as follows:**

“...Information on the registration shall include the legislative liaison or legislative lobbyist’s name, business address, including electronic mail address and business telephone numbers, the name and address of each lobbyist principal by whom the liaison or lobbyist is employed or retained **including disclosure of whether each lobbyist principal is a government, political party, individual or entity organized in or with its principal place of business located in a country of particular concern as identified by the US Department of State,** and the date of the registration.”

# Compliance Update

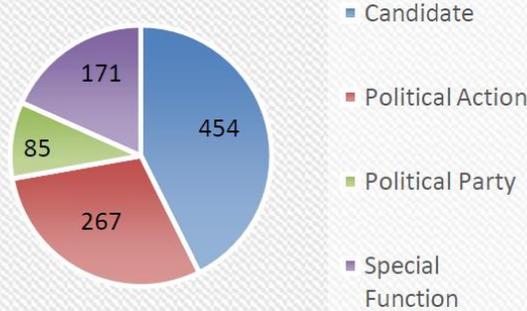
## THE GUARDIAN SYSTEM REGISTRANTS Active Filers as of February 3, 2026

### Lobbyists



**Total Lobbyists: 630**

### Committees



**Total Committees: 977**

**Total Lobbyists and Committees: 1,607**

## Upcoming Reporting Schedules

### Lobbyist/Liaison

Legislative  
Lobbyist/Liaison  
2026 January –  
**February 5,  
2026**

Legislative  
Lobbyist/Liaison  
2026 March –  
**April 5, 2026**

Legislative  
Lobbyist/Liaison  
2026 February -  
**March 5, 2026**

## Candidates & Non-Candidate Committees

2026 1<sup>st</sup> Quarter (2022-  
2026 Committees) Due  
**April 30, 2026**  
(Candidates and non-  
Candidate Committees)

2026 2<sup>nd</sup> Quarter (2022-  
2025 Committees) Due  
**July 31, 2026**  
(Candidates and non-  
Candidate Committees)

2026 Pre-Primary Reports (2026  
Committees) **Due June 8, 2026**

# Compliance Update

## Recent Reporting Statistics

### Candidates & Non-Candidate Committees

2025 3<sup>rd</sup> Quarter Reports (Due by 1/30/26)

➤ **96% Filed by Deadline**

- 18 Filed late; **18** yet to be Filed

2025 4<sup>th</sup> Quarter Reports (Due by 1/31/26)

➤ **98% Filed by Deadline**

- 21 Filed late; **24** yet to be Filed

\*As a comparison to 2024:

➤ **2024** 3Q reports: 20 were late and 9 were unfiled;

➤ **2024** 4Q reports: 5 were late and 25 were unfiled.

### Lobbyist/Liaison

2025 Executive Lobbyist ONLY

3<sup>rd</sup> Quarter Reports (Due by 1/14/26)

➤ 100% Filed by Deadline

4<sup>th</sup> Quarter Reports (Due by 1/15/26)

➤ 97% Filed by Deadline; 1 yet to be Filed

2025 Lobbyist/Liaison July-December (Due by 1/15/26)

➤ 97% Filed by Deadline ; 11 yet to be Filed

\*As a comparison to 2024:

➤ **2024 July-December** Reports, 12 were late and 3 were unfiled.

## Proactive Compliance Support Measures

- 10-day administrative grace period provided during Guardian transition
- Late filings within grace period accepted without penalty
- Diversion program offered to remaining late filers
- Focus on education and compliance over enforcement

- **40 Additional Filers** assisted to file timely during Guardian transition.

# Compliance Update

COMPLIANCE ACTIVITY TRACKER				
DATE – JANUARY 2026				
	COMPLIANCE OFFICERS			
	CO#1	CO#2	CO#3	CO#4
# CANDIDATES/OFFICES ASSIGNED*	89	85	93	90
# OTHER COMMITTEE TYPES/LOBBYISTS ASSIGNED	365	647	85	2
CALLS/WALK-INS	107	75	195	105
REPORTS REVIEWED	0	0	0	0
EMAIL CORRESPONDENCE	579	462	129	201
TOTALS	686	537	324	306

\* Assigned numbers do not include Political Subdivision Compliance Officer assignments.





Change Request  
for Political  
Subdivisions

2026 Election  
Cycle

# The Guardian | Political Subdivision Implementation

- ▶ **Due to the failure of a third-party vendor to deliver a functioning reporting system** under contract, the Commission is temporarily unable to accept electronic filings from political subdivision filers. The **Commission's priority is maintaining fair, accurate, and publicly accessible reporting** while a permanent electronic filing solution is restored.
  - ▶ **First priority** was stability of system and ensuring all statewide reporting due by Jan. 31 was received with no reporting issues. With 96% and 98% reporting by the deadline, we know stability was achieved. Civix immediately prioritized the effort and redirected significant internal technical and project resources to Oklahoma to ensure the system was operational, secure, and capable of accepting filings as quickly as possible.
  - ▶ The **ability for political subdivisions to file touches almost all aspects of legacy Guardian system.** This is an older system and we must take necessary time to do it correctly. Civix is prepared to address legislative changes enacted in 2025 that were originally intended to be incorporated into the replacement system. To ensure compliance within the reinstated Guardian environment, Civix is submitting a change request (CR-SRS) to be completed over a 12-15 week period.

# The Guardian | Political Subdivision

## Implementation of Interim Solutions while restoring full electronic reporting:

- This is about capacity, not avoidance
- Must prioritize integrity and accuracy
- Transparency about the problem
- Active pursuit of solutions

# The Guardian | Political Subdivision

- **Due to a recent statutory change, political subdivision filers are no longer permitted to file reports locally and must file with the Commission.**
- **With more than 3,000 active filers and fixed statutory deadlines, a paper-based intake process is not operationally feasible.** Paper filing would overwhelm available staffing, increase the risk of processing errors, delay public disclosure, and result in inconsistent treatment among filers.
- **The Commission is evaluating temporary staffing options** to assist with intake and public records processing during this transition period.
- **To preserve public access, the Commission is exploring the creation of a temporary public document repository** through third-party hosting solutions.
- **State technology partners have advised they do not currently have capacity to implement such a system,** and the Commission is actively pursuing alternative solutions to ensure filings remain publicly accessible.
- **Maintaining fair, accurate, and publicly accessible reporting remains the Commission's priority** while a permanent electronic filing solution is restored.



- **Establish full scale Diversion Program after pilot program's conclusion. Will reduce compliance fees/fines and create a proactive approach to compliance. First-time offenders and other broad categories will be prioritized. Maintain records of completion for diversion program and establish data points to determine effectiveness.**
- **Offered Diversion to all late filers after 3rd and 4th quarter reporting, including lobbyists – around 50 individuals. This was offered at the time of Proposed Compliance Order issuance, rather than waiting for requests for Administrative Hearing from those who did not meet filing deadline. Records of requests and attendance will be maintained by the Ethics Commission.**

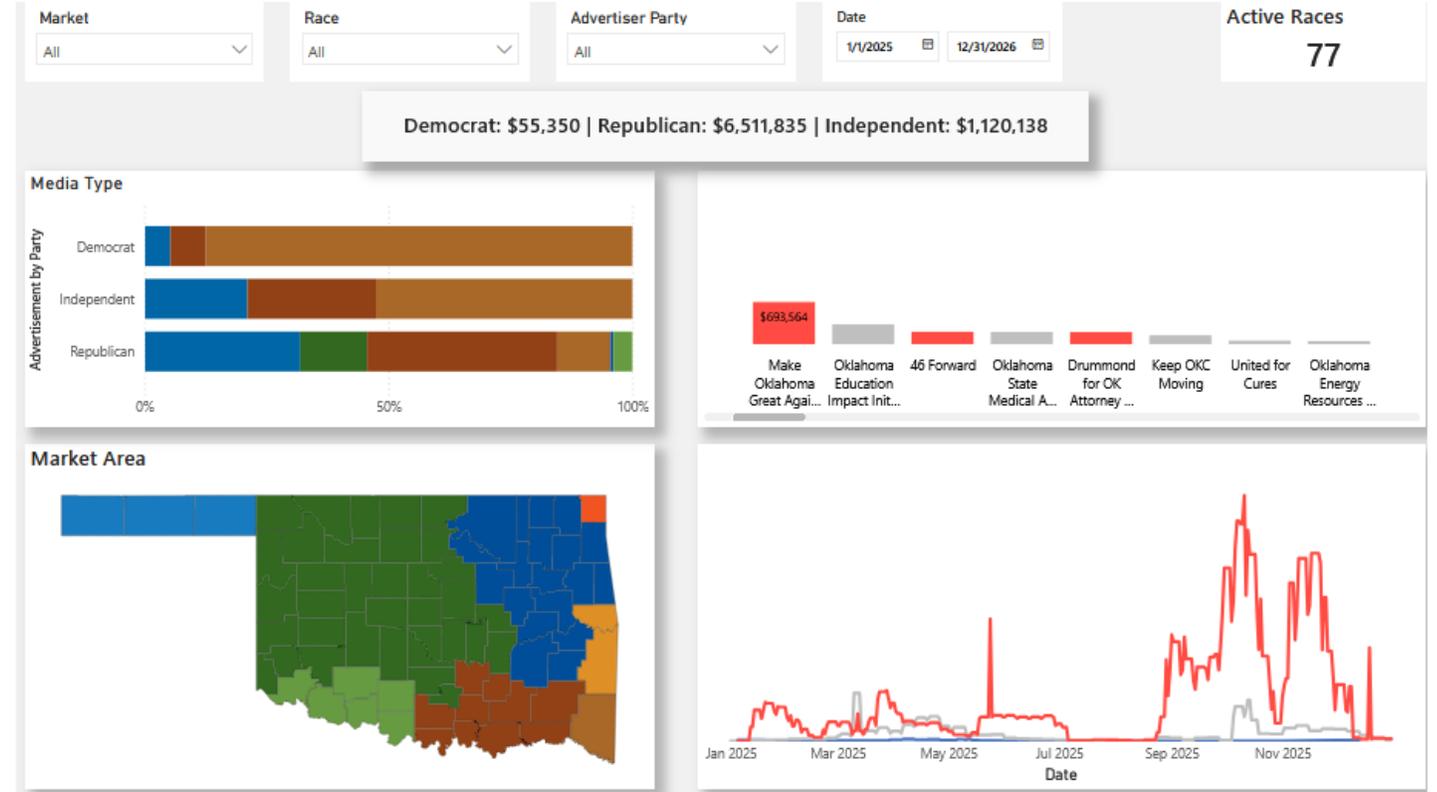
# AdImpact

➤ Political Advertising  
Public Resource

➤ [oklahoma.gov/ethics/resources/citizens/adimpact](http://oklahoma.gov/ethics/resources/citizens/adimpact)



## Summary of Political Advertising in Oklahoma





# Advisory Group 2026 Quarterly Meetings

- A reminder was sent to Advisory Group members for the upcoming meeting scheduled for **February 20, 2026**.

The future 2026 meeting dates:

- **May 15, 2026**
- **August 21, 2026**
- **November 20, 2026**



# OKLAHOMA

## Ethics Commission



Commission Meeting  
February 12, 2026 10:00 AM  
OK State Capitol, Rm. G-3



## Executive Session



# OKLAHOMA

## Ethics Commission



Commission Meeting  
February 12, 2026 10:00 AM  
OK State Capitol, Rm. G-3



Returning Soon From  
Executive Session



# OKLAHOMA

## Ethics Commission



Commission Meeting  
February 12, 2026 10:00 AM  
OK State Capitol, Rm. G-3

# Possible Action Following Executive Session

**Case No. CJ-2026-558, State of  
Oklahoma ex rel. Oklahoma  
Ethics Commission v.  
RFD & Associates, Inc.,  
Oklahoma County District  
Court.**



**OKLAHOMA**  
Ethics Commission

**Case No. 2024-38, alleging  
violations of Campaign Finance  
Ethics Rule 2**

# Case No. 2024-32, alleging violations of Conflicts of Interest Rule 4.



**OKLAHOMA**  
Ethics Commission

**C-26-02**

**C-26-03**

**C-26-04**

**No Action On:**

**C-26-04**



**OKLAHOMA**  
Ethics Commission



**New Business**



**Adjournment**



**Next Regularly Scheduled  
Commission Meeting  
March 12, 2025 @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 11, 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**

