



OKLAHOMA

Ethics Commission



Commission Meeting
January 15, 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 November 13, 2025



Consideration, discussion and possible action on proposed Ethics Rules Amendments (ERA)

ERA 2025-01



Amendment modifies Ethics Rule 2.19

Modification: Increasing cash contribution limit from \$50 to \$200

AMENDATORY Ethics Rule 2.19 Cash Contributions is amended to read as follows:

No contribution of more than ~~Fifty Dollars (\$50.00)~~ **Two Hundred Dollars (\$200.00)** in cash in the aggregate may be made to or accepted by a political party committee, a political action committee or a candidate committee.

ERA 2025-01

Ethics Rule 2.19



OKLAHOMA
Ethics Commission

Rule 2.19. Cash Contributions.

No contribution of more than Fifty Dollars (\$50.00) in cash in the aggregate may be made to or accepted by a political party committee, a political action committee or a candidate committee.

History

Promulgated by Ethics Commission January 10, 2014; effective upon Legislature's sine die adjournment May 23, 2014; operative January 1, 2015.

Amendment promulgated by Ethics Commission February 5, 2018; effective upon Legislature's sine die adjournment May 3, 2018; operative May 3, 2018.

The 2018 amendment added "to" between "may be made" and "or accepted" in the provision.

Commission Comment

Because cash cannot be traced as easily as a check or credit card, the Commission limits the amount of funds that can be contributed in cash. Cash contributions are not prohibited entirely in the interests of providing opportunities for small (e.g., \$1 or \$5) contributions, for example, and of preserving traditional small fundraising activities such as "passing the hat" at campaign events. Candidates and their agents should monitor such events closely to ensure that contributors understand and comply with the limits on cash contributions. For instance, half of a One Hundred Dollar (\$100.00) cash contribution placed in a "hat" at a fundraising event would have to be forfeited if the recipient could not identify the donor, reject the cash and have it replaced by written instrument. See Rule 2.20 regarding forfeitures to the state general revenue fund.

The cash contribution limit applies to all committees, including unlimited committees. The cash contribution limit applies to political action committees on a per calendar year basis.

Example: *Sue gave \$50 in cash to PAC X, an unlimited committee, in 2020. Sue is prohibited from giving any more cash to PAC X in 2020, but she can still contribute to PAC X in 2020 via other types of monetary contributions or in-kind contributions. Additional contributions will be aggregated with the \$50 cash contributions for contribution limit purposes.*

ERA 2025-02



Amendment modifies Ethics Rule 2.48

Option 1 Modification: Adding provision for committees with funds remaining at the time of dissolution for exploratory activities and extending time limit to **6 months**.

Option 2 Modification: Adding provision for committees with funds remaining at the time of dissolution for exploratory activities and extending time limit to **1 year**.

ERA 2025-02



Amendment modifies Ethics Rule 2.48

AMENDATORY Ethics Rule 2.48 Candidate Committee Surplus Funds is amended to read as follows:

“... (H) Retained by the Candidate for Exploratory Activities in accordance with Rule 2.78.

Any surplus funds remaining in the candidate committee’s possession within ninety ~~(90) days~~ _____ after the expiration of the term to which the candidate was elected or, for candidates who were not elected, within ninety ~~(90) days~~ _____ after the second year following the general election, shall be deposited in the general revenue fund of the state.



Rule 2.48. Candidate Committee Surplus Funds.

Surplus funds of a candidate committee are those funds not otherwise obligated following the election at which the office for which the candidate committee was formed has been determined which, in the candidate's discretion, are not required to be used for campaign expenses or officeholder expenses. Such surplus funds may be:

- (A) Retained in any amount for use in a future campaign for the next succeeding term for the same office;
- (B) Retained for a future campaign for a different state elective office, excluding a judicial office;
- (C) Donated to a charitable organization as described in Section 501(c)(3) of Title 26 of the United States Code as it currently exists or as it may be amended;
- (D) Returned to any contributor, as long as the amount returned does not exceed the contributor's aggregate contribution during the immediately preceding primary, runoff primary and general elections;
- (E) Contributed to a political party committee in any amount not to exceed Twenty-five Thousand Dollars (\$25,000.00) in the aggregate;
- (F) Used to purchase item(s) for donation to a charitable organization as described in Section 501(c)(3) of Title 26 of the United States Code as it currently exists or as it may be amended; provided:
 - 1) the donated item(s) are sold by the charitable organization for fundraising purposes;
 - 2) the purchase of the item(s) for donation is reported on a Contributions and Expenditures Report which includes a description and cost of the item(s) purchased;
 - 3) the donation of the item(s) is reported on a Contributions and Expenditures Report as an in-kind expenditure to the charitable organization which includes a description and the value of the item(s) donated; and
 - 4) the donated item(s) may not be purchased or used by the candidate whose committee is donating the item, any other candidate, a committee, or officer, board member or employee of the charitable organization; or
- (G) Donated in accordance with the provisions of Title 60 O.S. § 381, et seq., to the State of Oklahoma, or, to any county, city, town or school district within the State of Oklahoma.

Any surplus funds remaining in the candidate committee's possession within ninety (90) days after the expiration of the term to which the candidate was elected or, for candidates who were not elected, within ninety (90) days after the second year following the general election, shall be deposited in the general revenue fund of the state.

History

Promulgated by Ethics Commission January 10, 2014; effective upon Legislature's sine die adjournment May 23, 2014; operative January 1, 2015.

Amendment promulgated by Ethics Commission on January 27, 2017; effective upon sine die adjournment of the Legislature May 26, 2017; operative May 26, 2017.

The 2017 amendment added subsections (F) and (G) in their entirety.

Commission Comment

A candidate cannot determine the existence of surplus funds until after the election for which the funds were received. For that reason, this Rule cannot be applied until after the election.

A candidate may continue to use campaign funds for campaign purposes and officeholder expenses and still determine that some funds are "surplus funds" and thus available for use as provided in this Rule.

The rule allows for surplus funds to be returned to a contributor up to the amount contributed, but this does not include contributions from the candidate. Contributions cannot be returned to the candidate unless the candidate executed a written loan document with the committee at the time of the loan, and deposited the funds from the loan into the committee's depository at the time of the loan. See also Rule 2.67, prohibiting repayment to a candidate except in the case of a properly documented loan to the candidate committee.

This Rule also provides that surplus funds remaining in the candidate committee's possession ninety (90) days after the expiration of the term to which the candidate was elected are forfeited to the State. For candidates who are not elected, the ninety (90) day period begins two years after the general election.

Advisory Opinion 2019-01: A candidate committee without funds remaining in its campaign depository must dissolve by the specified mandatory dissolution date as established in Rule 2.116.

Whereas, a candidate committee with funds remaining in its campaign depository on the specified mandatory dissolution date as established in Rule 2.116 are, from the mandatory dissolution date and on, no longer permitted to (1) receive contributions, (2) contribute to other candidate committees, (3) make campaign expenditures, or (4) make operating expenditures. However, such committees may make the following expenditures:

- a. Candidate committees of **elected officers** may make expenditures (1) for officeholder expenses until his/her term expires or the office is vacated and (2) of surplus funds as provided for in Rule 2.48 for ninety (90) days after the officeholder's term is completed or vacated; or
- b. Candidate committees of **unelected candidates** may make expenditures of surplus funds as provided for in Rule 2.48 for ninety (90) days after the second year following the general election for which the committee was formed.

After the ninety (90) day period has ended, any remaining funds must be deposited in the state's general revenue fund.

ERA 2025-03



Amendment modifies Ethics Rule 2.79

Modification: Updating definition of a PAC to include any one person or more than one individual.

AMENDATORY Ethics Rule 2.79 Political Action Committee Definition is amended to read as follows:

A political action committee is (a) any group of two or more ~~persons~~ individuals; or (b) any person, other than an individual, including but not limited to a committee, association, organization or any other entity, whether one or more, and whether or not incorporated; that receives contributions or makes expenditures for any of the following purposes: (1) Making contributions to candidates or candidate committees; (2) making contributions to other political action committees; (3) making independent expenditures; (4) making electioneering communications or (5) advocating the approval or defeat of a state question. Unless they choose to be considered as such, family members, as defined by these Rules, or members of the same household shall not be considered a political action committee.

ERA 2025-03

Ethics Rule 2.79



OKLAHOMA
Ethics Commission

Political Action Committees

Rule 2.79. Political Action Committee Definition.

A political action committee is any group of two or more persons that receives contributions or makes expenditures for any of the following purposes: (1) Making contributions to candidates or candidate committees; (2) making contributions to other political action committees; (3) making independent expenditures; (4) making electioneering communications or (5) advocating the approval or defeat of a state question. Unless they choose to be considered as such, family members, as defined by these Rules, or members of the same household shall not be considered a political action committee.

History

Promulgated by Ethics Commission January 10, 2014; effective upon Legislature's sine die adjournment May 23, 2014; operative January 1, 2015.

Commission Comment

With an exception for families or members of the same household, any group of two or more persons create a political action committee by operation of law when they receive contributions or make expenditures for any of the five listed activities. This applies to both limited and unlimited committees.

ERA 2025-04



Amendment modifies Ethics Rule 2.116

Option 1 Modification: Adding provision for committees with funds remaining at the time of dissolution and extending time for dissolution to 6 months.

Option 2 Modification: Adding provision for committees with funds remaining at the time of dissolution and extending time for dissolution to 1 Year.

ERA 2025-04

Ethics Rule 2.116



OKLAHOMA
Ethics Commission

Rule 2.116. Dissolution of Candidate Committee.

A candidate committee may dissolve at any time by filing a Final Report of Contributions and Expenditures that shows no funds remaining in the committee. A candidate committee shall dissolve no later than two (2) years after the general election for an office with a two-year term, no later than four (4) years after the general election for an office with a four-year term, and no later than six (6) years after the general election for an office with a six-year term, if not required to dissolve sooner by law or these Rules.

History

Promulgated by Ethics Commission January 10, 2014; effective upon Legislature's sine die adjournment May 23, 2014; operative January 1, 2015.

The 2017 amendment's addition of a new Rule as section 2.109 modified this Rule's section number from 2.115 to 2.116.

Commission Comment

Candidate committees may file a final report and dissolve only when there are no funds remaining in the committee.

Candidate committees are required to terminate their existence by a date certain. Candidates, including candidates losing an election, have a continuing duty to timely submit Reports of Contributions and Expenditures, even if the candidate committee has no activity, until the candidate committee is dissolved to the satisfaction of the Commission and a Final Report of Contributions and Expenditures is filed. See, also, Rule 2.48 for candidates who are not elected.

The mandatory time frames for dissolution of candidate committees are based on the term of office for the office that the candidate serves. This ensures the timely dissolution of candidate committees and levels the playing field for successful candidates and unsuccessful candidates. The committee may dissolve after resolving any debt. See Rule 2.117.

Advisory Opinion 2019-01: A candidate committee without funds remaining in its campaign depository must dissolve by the specified mandatory dissolution date as established in Rule 2.116.

However, a candidate committee with funds remaining in its campaign depository on the specified mandatory dissolution date as established in Rule 2.116 are, from the mandatory dissolution date and on, no longer permitted to (1) receive contributions, (2) contribute to other candidate committees, (3) make campaign expenditures, or (4)

ERA 2025-04



Amendment modifies Ethics Rule 2.116

AMENDATORY Ethics Rule 2.116 Dissolution of Candidate Committee is amended to read as follows:

A candidate committee may dissolve at any time by filing a Final Report of Contributions and Expenditures that shows no funds remaining in the committee. A candidate committee **without funds remaining in its campaign depository** shall dissolve **by the mandatory dissolution date, being** no later than two (2) years after the general election for an office with a two-year term, no later than four (4) years after the general election for an office with a four-year term, and no later than six (6) years after the general election for an office with a six-year term, if not required to dissolve sooner by law or these Rules.

ERA 2025-04



Amendment modifies Ethics Rule 2.116

(Continued)

A candidate committee with funds remaining in its campaign depository on the specified mandatory dissolution date set forth above, may no longer (1) receive contributions, (2) contribute to other candidate committees, (3) make campaign expenditures, or (4) make operating expenditures.

For no longer than **six (6) months**/**one (1) year** following the mandatory dissolution date as set forth above, a candidate committee with funds remaining in its campaign depository on the specified mandatory dissolution date, may (1) make expenditures for remaining officeholder expenses for elected officers, and (2) distribute any surplus funds as provided for in Rule 2.48.

ERA 2025-05



Amendment modifies Ethics Rule 5.2

Modification: Adding definitions for “traditional business expense” and “de minimis amounts.”

AMENDATORY Ethics Rule 5.2 Definitions is amended to read as follows:

3. “**De minimis amounts**” are expenditures of \$20.00 or less expended for Traditional Business Expenses. If the yearly cumulative amount spent on the Governor, a legislator or any employee of the Governor or the Legislature is greater than the de minimis amount, it shall be reported and aggregated against the Traditional Business Expenses limit provided to an individual recipient.

ERA 2025-05



Amendment modifies Ethics Rule 5.2

(Continued)

Modification: Adding definitions for “traditional business expense” and “de minimis amounts.”

AMENDATORY Ethics Rule 5.2 Definitions is amended to read as follows:

11. **“Traditional Business Expenses”** means expenditures for meals, any individual or team sports, athletic contests or events, conferences, lectures, performances, seminars, or similar events held within the boundaries of the State of Oklahoma.

ERA 2025-06



Amendment modifies Ethics Rule 5.3

Modification: Adding provision for Lobbyist disclosure of countries of particular concern.

AMENDATORY Ethics Rule 5.3 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.”

Rule 5.3. Annual Registration for Legislative Liaison and Legislative Lobbyist.

Each legislative liaison or legislative lobbyist shall be required to register with the Ethics Commission each year that the legislative liaison or legislative lobbyist engages in lobbying. Each legislative liaison or legislative lobbyist shall register or renew his or her registration with the Commission and pay any applicable fees no earlier than December 1 of each year nor later than January 15 of the following year for the calendar year beginning January 1 or within five (5) days after engaging in lobbying on behalf of one or more lobbyist principals. Registration by legislative liaisons or legislative lobbyists shall be filed electronically, unless otherwise ordered by the Commission or the Executive Director of the Commission. 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 and the date of the registration.



History

Promulgated by Ethics Commission January 10, 2014; effective upon Legislature's sine die adjournment May 23, 2014; operative December 1, 2014.

Amendment promulgated by Ethics Commission January 27, 2017; effective upon sine die adjournment of the Legislature May 26, 2017; operative May 26, 2017.

The 2017 amendment added "and pay any applicable fees" in the second sentence between "the Commission" and "no earlier than," and it added "of each year" in the second sentence between "December 1" and "nor later than." Also in the second sentence, the 2017 amendment replaced "December 31" with "January 15," deleted "each" between "of" and "year," and moved "the following" from between "beginning" and "January 1" to between "of" and "year." The 2017 amendment removed the following language at the end of sentence two after "lobbyist principals": "and pay a registration fee of One Hundred Dollars (\$100.00) and an additional processing fee for using a credit card. Each legislative liaison or legislative lobbyist may be reimbursed for the registration fee and service fee by a lobbyist principal." The sentences read: "Each legislative liaison or legislative lobbyist shall register or renew his or her registration with the Commission no earlier than December 1 nor later than December 31 of each year for the calendar year beginning the following January 1 or within (5) five days after engaging in lobbying on behalf of one or more lobbyist principals and pay a registration fee of One Hundred Dollars (\$100.00) and an additional processing fee for using a credit card. Each legislative liaison or legislative lobbyist may be reimbursed for the registration fee and service fee by a lobbyist principal."

Commission Comment

This Rule acknowledges that legislative liaisons and legislative lobbyists often work year-round and on a continuing basis. It also recognizes the fact that some legislative lobbying is done on an ad hoc basis. This Rule provides for registration of lobbyists under both sets of circumstances.

A lobbyist or legislative liaison must register even if they will only be lobbying part of one day in a calendar year.

By having the registration deadline include the period for filing the final report for the prior registration year, a lobbyist or liaison is able to both file the final report for the prior year and renew the registration for the upcoming year on the same day

A registration filed by January 15th is prospective only and registers a liaison or lobbyist for the entire calendar year, which begins January 1st.

ERA 2025-07



Amendment modifies Ethics Rule 5.5

Modification: Adding provision for Lobbyist disclosure of countries of particular concern.

AMENDATORY Ethics Rule 5.5 Annual Registration and Termination of Registration for Executive Lobbyist is amended to read as follows:

“...Information on the registration shall include the executive lobbyist’s name, business address, including electronic mail address and business telephone numbers, the name and address of each lobbyist principal by whom the 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**, the agency or agencies before which the lobbyist is lobbying and the date of the registration....”

ERA 2025-07

Rule 5.5. Annual Registration and Termination of Registration for Executive Lobbyist.

Each executive lobbyist shall be required to register with the Ethics Commission. An executive lobbyist may register and pay any applicable fees no earlier than December 1 of each year nor later than January 15 of the following year for the calendar year beginning January 1 or within five (5) days after engaging in lobbying on behalf of one or more lobbyist principals. Registration by executive lobbyists shall be filed electronically, unless otherwise ordered by the Commission or the Executive Director of the Commission. Information on the registration shall include the executive lobbyist's name, business address, including electronic mail address and business telephone numbers, the name and address of each lobbyist principal by whom the lobbyist is employed or retained, the agency or agencies before which the lobbyist is lobbying and the date of the registration. The executive lobbyist may terminate his or her registration at any time by electronically filing a notice of termination on a form provided by the Commission and filing a final Executive Lobbyist Report. An executive lobbyist whose registration has not been terminated by November 30 of any year shall be required to register as provided in this subsection for the calendar year beginning the following January 1. Until terminated, the registration shall remain effective, and the executive lobbyist shall be required to file Executive Lobbyist Reports as provided by these Rules.



History

Promulgated by Ethics Commission January 10, 2014; effective upon Legislature's sine die adjournment May 23, 2014; operative December 1, 2014.

Amendment promulgated by Ethics Commission January 27, 2017; effective upon sine die adjournment of the Legislature May 26, 2017; operative May 26, 2017.

The 2017 amendment added "and pay any applicable fees" in the second sentence between "register" and "no earlier," and it added "of each year" between "December 1" and "nor later" to the second sentence. Also in the second sentence, the 2017 amendment replaced "December 31" with "January 15," deleted "each" between "of" and "year," and moved "the following" from between "beginning" and "January 1" to between "of" and "year." The second sentence read: "An executive lobbyist may register no earlier than December 1 nor later than December 31 of each year for the calendar year beginning the following January 1 or within five (5) days after engaging in lobbying on behalf of one or more lobbyist principals."

The 2017 amendment removed the language "no earlier than December 1 nor later than December 31 of that year to continue his or her registration through December and" from the sixth sentence, and it added "as provided in this subsection" to the sixth sentence between "register" and "for the calendar year." The sentence read: "An executive lobbyist whose registration has not been terminated by November 30 of any year shall be required to register no earlier than December 1 nor later than December 31 of that year to continue his or her registration through December and for the calendar year beginning the following January 1."

Commission Comment

This Rule acknowledges that executive lobbyists often work year-round and on a continuing basis. It also recognizes the fact that some executive lobbying is done on an ad hoc basis. This Rule provides for registration of lobbyists under both sets of circumstances. It permits lobbyists to terminate their registrations at any time provided they file a final report. It requires lobbyists to continue filing reports until their registration has been terminated.

By having the registration deadline include the period for filing the final report for the prior registration year, a lobbyist is able to both file the final report for the prior year and renew the registration for the upcoming year on the same day.

A registration filed by January 15th is prospective only and registers a liaison or lobbyist for the entire calendar year, which begins January 1st.

ERA 2025-08



Amendment modifies Ethics Rule 5.6

Modification: Adding provision for traditional business expenses.

AMENDATORY Ethics Rule 5.6 Prohibition on Things of Value Provided to or Accepted by Governor, Legislative Officers and Employees is amended to read as follows:

“...The Governor, a legislator or any employee of the Governor or the Legislature shall not knowingly accept anything of value from a legislative liaison, a legislative lobbyist or a lobbyist principal by whom the legislative liaison or legislative lobbyist is employed or retained except **for expenditures expended as traditional business expenses as defined in Rule 5.2 or** as permitted by these Rules...”



Rule 5.6. Prohibition on Things of Value Provided to or Accepted by Governor, Legislative Officers and Employees.

Except as provided in these Rules, a legislative liaison, a legislative lobbyist or a lobbyist principal by whom the legislative liaison or legislative lobbyist is employed or retained shall provide no gift to the Governor, a legislator or any employee of the Governor or the Legislature.

The Governor, a legislator or any employee of the Governor or the Legislature shall not knowingly accept anything of value from a legislative liaison, a legislative lobbyist or a lobbyist principal by whom the legislative liaison or legislative lobbyist is employed or retained except as permitted by these Rules. Except as provided in these Rules, an executive lobbyist or a lobbyist principal by whom the executive lobbyist is employed or retained shall provide nothing of value to any officer or employee of an agency that is the subject of the executive lobbyist's lobbying activities. No officer or employee of an agency that is subject to an executive lobbyist's lobbying activities shall knowingly accept anything of value from an executive lobbyist or a lobbyist principal by whom an executive lobbyist is employed except as permitted by these Rules. In no event shall a legislative liaison, a legislative lobbyist, an executive lobbyist or a lobbyist principal indirectly provide anything of value to any state officer or employee by providing a thing of value to a family member of the state officer or employee, other than as permitted by these Rules. In no event shall the costs of a thing of value provided by a legislative liaison or legislative lobbyist to the Governor, a legislator or any employee of the Governor or the Legislature permitted by these Rules be divided or shared with other legislative liaisons or legislative lobbyists in filing a report required by these Rules unless otherwise provided by these Rules. Agencies may provide two (2) tickets or admissions to any conference, seminar, lecture or similar event held within the boundaries of the State of Oklahoma and sponsored in whole or in part by the agency to the Governor, any legislator or any employee of the Governor or Legislature, provided the tickets or admissions are used by the recipient and a family member of the recipient.

Commission Comment

This Rule absolutely prohibits the giving of a thing of value by a legislative liaison, a legislative lobbyist or a lobbyist principal to the Governor, legislators or members of their staff unless otherwise permitted by the Rules. Both the giving of a thing of value by a liaison, lobbyist or lobbyist principal and the receiving by the Governor, a legislator or their staff members is prohibited. In other words, unless there is a specific authorization for the giving of such a thing of value elsewhere in the Rules, this Rule prohibits it. The same prohibition applies to transactions between an executive lobbyist and state officers and employees in the agency that is the subject of the executive lobbyist's lobbying activities. Further, the Rule bars attempted circumvention of the prohibition by the giving of a gift to a family member of a state officer or employee when the giving of a thing of value is prohibited for the state officer or employee. The Rule also prohibits lobbyist ticket splitting unless specifically authorized elsewhere in these Rules.

The Rule recognizes that state agencies that are lobbyist principals may sponsor conferences, seminars, lectures and similar events that are useful in the discharge of duties by state officers and employees and provides a limited exception for tickets or admissions to such events.

Staff Memorandum 2015-05: *If a meal is provided by a lobbyist to a legislator and a family member, such as a spouse, only the meal provided to the legislator is reportable and counts against the lobbyist's monetary limit for meals. This only applies to meals, not gifts, such as a gift for an "infrequently occurring occasion of personal significance."*

Staff Memorandum 2015-02: *Gifts to the state are categorically different than gifts to individual state officers and employees referenced in the Ethics Rules; consequently, any gifts given to the state fall outside the scope of the Ethics Rules.*

History

Promulgated by Ethics Commission January 10, 2014; effective upon Legislature's sine die adjournment May 23, 2014; operative January 1, 2015.
Amendment promulgated by Ethics Commission January 9, 2015; effective upon sine die adjournment of the Legislature May 22, 2015; operative May 22, 2015.

The 2015 amendment changed the words "nothing of value" in the first sentence to "no gift" and added the following sentence at the end of the Section: "Agencies may provide two (2) tickets or admissions to any conference, seminar, lecture or similar event held within the boundaries of the State of Oklahoma and sponsored in whole or in part by the agency to the Governor, any legislator or any employee of the Governor or Legislature, provided the tickets or admissions are used by the recipient and a family member of the recipient."

Amendment promulgated by the Ethics Commission January 27, 2017; effective January 1, 2018; operative January 1, 2018.

The 2017 amendment added the following sentence to the end of the provision: "For all other gifts provided by a legislative liaison, legislative lobbyist or executive lobbyist that include meals or attendance at an event, the lobbyist or legislative liaison must attend the meal or event with the recipient."

Amendment promulgated by the Ethics Commission February 4, 2025; effective upon sine die adjournment of the legislature May 30, 2025; operative May 30, 2025.

The 2025 amendment removed the attendance requirement of lobbyists.

ERA 2025-09



Amendment modifies Ethics Rule 5.8

Modification: Adding provision for traditional business expenses.

AMENDATORY Ethics Rule ~~5.8 Gift Limits for Legislative Liaison or Legislative Lobbyist~~ is repealed in its entirety:

~~A legislative liaison or a legislative lobbyist may make a gift to the Governor or any legislator or any employee of the Governor or the Legislature in recognition of infrequently occurring occasions of personal significance. The gift shall be given and received contemporaneously with the occasion or at times when such gifts are traditionally given. Such gifts may be made to a family member of the Governor or any legislator or any employee of the Governor or the Legislature, provided such family member is a party to a marriage, serious illness, birth or adoption of a child or retirement. Such gifts to any individual recipient may not exceed Two Hundred Dollars (\$200.00) in the aggregate in any calendar year from any legislative liaison or legislative lobbyist. Any such gifts shall be reported to the Commission and aggregated with meals, and the aggregate total of meals and other gifts provided to an individual recipient by a legislative liaison or legislative lobbyist may not exceed Seven Hundred and Fifty Dollars (\$750.00).~~

Rule 5.8. Gift Limits for Legislative Liaison or Legislative Lobbyist.

A legislative liaison or a legislative lobbyist may make a gift to the Governor or any legislator or any employee of the Governor or the Legislature in recognition of infrequently occurring occasions of personal significance. The gift shall be given and received contemporaneously with the occasion or at times when such gifts are traditionally given. Such gifts may be made to a family member of the Governor or any legislator or any employee of the Governor or the Legislature, provided such family member is a party to a marriage, serious illness, birth or adoption of a child or retirement. Such gifts to any individual recipient may not exceed Two Hundred Dollars (\$200.00) in the aggregate in any calendar year from any legislative liaison or legislative lobbyist. Any such gifts shall be reported to the Commission and aggregated with meals, and the aggregate total of meals and other gifts provided to an individual recipient by a legislative liaison or legislative lobbyist may not exceed Seven Hundred and Fifty Dollars (\$750.00).

History

Promulgated by Ethics Commission January 10, 2014; effective upon Legislature's sine die adjournment May 23, 2014; operative January 1, 2015.

Amendment promulgated by Ethics Commission January 27, 2017; effective January 1, 2018; operative January 1, 2018.

The 2017 amendment added the following sentence as the second sentence in the provision: "The gift shall be given and received contemporaneously with the occasion or at times when such gifts are traditionally given." The 2017 amendment replaced "Two Hundred Dollars (\$200.00)" with "One Hundred Dollars (\$100.00)" and added "reported to the Commission and" between "Any such gifts shall be" and "aggregated with" in the last sentence.

Amendment promulgated by Ethics Commission February 4, 2025; effective upon Legislature's sine die adjournment May 30, 2025; operative May 30, 2025.

The 2025 amendment raised the gift limit from \$100.00 to \$200.00 and raised the aggregate limit from \$500.00 to \$750.00.

Commission Comment

This Rule allows a gift or gifts of up to the specified dollar limit in value to be given by a legislative liaison or legislative lobbyist to the Governor, a legislator or an employee of the Governor or the Legislature for "infrequently occurring occasions of personal significance." Gifts may be given to family members of the Governor or a legislator or employees of the Governor or the Legislature subject to certain limitations. While the term "infrequently occurring occasions of personal significance" is not defined, it is reasonable to assume that the events to which a family member must be "a party" would qualify. Those events include marriage, serious illness, birth or adoption of a child or retirement. Because there is no definition of the term, it is reasonable to assume there may be other events that meet the criterion. Any such gifts are aggregated with meals given to the recipient so that the total for a calendar year may not exceed Seven Hundred Fifty Dollars (\$750.00). See Rule 5.7.

A legislative liaison or legislative lobbyist should ensure a recipient of a gift is an individual who accepts gifts from liaisons or lobbyists prior to providing the gift. Typically, gifts may be returned to a lobbyist or legislative liaison to negate the gift if the recipient does not accept gifts. However, flowers, and other perishable gifts are difficult, if not impossible to return. In the event an unwanted and perishable gift is provided, the recipient of the gift should contact Ethics Commission staff as soon as practicable for advice.

Advisory Opinion 2018-01 (Rescinded 12/11/2021 as It Interprets Rule 5 Inconsistently with Rule Change 2021-02 as to giving of books and similar informational materials, but does not impact the following advice): A gift given for an infrequently occurring occasion of personal significance may be given on an occasion that is both infrequent and in recognition of a major life event that is personally significant to the recipient. Events which are annually occurring, such as birthdays, anniversaries, and holidays, are not infrequently occurring occasions of personal significance within the meaning of Ethics Rules 5.8 and 5.11.

Commission Enforcement Directive 12/31/2020: Ordering Director to enforce Rule 5 in accordance with Promulgated Rule Change 2021-02 as of January 1, 2021.

- **Rule Change 2021-02:** provides a new exception to the Gift prohibition in order to allow Governor, Legislators, and their staff to accept books and similar informational materials related to their state responsibilities from legislative lobbyists and liaisons, and lobbyist principals lobbying the Governor, Legislature, or their staff.
- Requires reporting of those items in the same manner of other gifts if the item exceeds \$100.
- Does not impact or require reporting of lobbying via written communications such as by letter, e-mail, text message, flyer, etc.



ERA 2025-10



Amendment modifies Ethics Rule 5.16

Modification: Adding provision for Lobbyist Principals to provide food and beverage for legislative sessions.

AMENDATORY Ethics Rule 5.16 Food and Beverage Provided by a Lobbyist Principal to either House of the Legislature, a Legislative Committee or Subcommittee is amended to read as follows:

A lobbyist principal that employs or retains a legislative liaison or legislative lobbyist may provide food and beverage for any event **or legislative session** held within the Capitol building to which all members of **either House of the Legislature**, a committee or subcommittee of either House of the Legislature identified in the Rules or Journal of the respective House are invited and which is attended by a majority of members of the **House of the Legislature**, committee or subcommittee no more than once per calendar year for any such **House of the Legislature**, committee or subcommittee, provided the event is reported as provided by these Rules. More than one lobbyist principal may provide food and beverage for such an event, but no lobbyist principal shall participate in more than one such event per calendar year for any committee or subcommittee. The reporting provision of this section shall not include legislators who are not members of the committee or subcommittee, nor shall it include legislative staff members who do not officially or regularly provide staff services for the committee or subcommittee.

Rule 5.16. Food and Beverage Provided by a Lobbyist Principal to a Legislative Committee or Subcommittee.

A lobbyist principal that employs or retains a legislative liaison or legislative lobbyist may provide food and beverage for any event held within the Capitol building to which all members of a committee or subcommittee of either House of the Legislature identified in the Rules or Journal of the respective House are invited and which is attended by a majority of members of the committee or subcommittee no more than once per calendar year for any such committee or subcommittee, provided the event is reported as provided by these Rules. More than one lobbyist principal may provide food and beverage for such an event, but no lobbyist principal shall participate in more than one such event per calendar year for any committee or subcommittee. The reporting provision of this section shall not include legislators who are not members of the committee or subcommittee, nor shall it include legislative staff members who do not officially or regularly provide staff services for the committee or subcommittee.

History

Promulgated by Ethics Commission January 10, 2014; effective upon Legislature's sine die adjournment May 23, 2014; operative January 1, 2015.

Amendment promulgated by Ethics Commission January 9, 2015; effective upon sine die adjournment of the Legislature May 22, 2015; operative May 22, 2015.

The 2015 amendment added the following sentence: "The reporting provision of this section shall not include legislators who are not members of the committee or subcommittee, nor shall it include legislative staff members who do not officially or regularly provide staff services for the committee or subcommittee."

Commission Comment

This Rule applies only to lobbyist principals that employ a legislative liaison or legislative lobbyist. The lobbyist principal may provide food and beverage for one meeting in any calendar year for a meeting of a committee or subcommittee of the Senate or House of Representatives. The meeting must be held within the State Capitol building. The committee or subcommittee must be identified as such in either the Rules of the respective House or in the official Journal of the respective House. To qualify, a majority of members of the committee or subcommittee must attend. For that reason, an attendance record should be maintained. The cost for food and beverage may be divided between multiple lobbyist principals for the same meeting, provided no lobbyist principal engages in this practice more than one time per calendar year per committee or subcommittee. The cost of food and beverage for such an event must be reported by the liaison or lobbyist. See Rule 5.21. The cost of food and beverage is not counted as part of the limits provided for liaisons and lobbyists in Rule 5.7.

Unlike events to which all members of the Legislature are invited, this exception is limited to members of the committee or subcommittee and legislative staff members who officially or regularly provide staff services for the committee or subcommittee. Other legislators or legislative staff must be reported by the lobbyist as recipients of individual gifts.

Lobbyist principals that share the cost of a meal provided at a meeting must share the cost with other lobbyist principals who are also sponsoring meals that will be reported as a lobbyist principal meal.

Staff Memorandum 2015-04: *There are no rules allowing a lobbyist principal to expend funds on a meal for an individual legislator; lobbyist principals may only expend funds for food and beverages at (1) events to which all the members of the Legislature are invited, (2) recognized caucus meetings, (3) legislative committee or subcommittee meetings, and (4) out-of-state events. Instead, a lobbyist must report any meals given to a legislator, regardless of the source of funds used to pay for the meal.*



Consideration, discussion and possible final action on the Commission's official promulgated rules and rule amendments for the Year 2026.

Executive Director's Report



Budget

As of December 31, 2025

<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								550,492.20
	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	464,137.80	.00	550,267.20	
				2,029,260.00		225.00	464,137.80	1,014,630.00	550,267.20	
	200	Revolving Fund								695,421.03
	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	47,562.10	19,140.40	.00	6,019.50	
				528,209.00		168,340.84	25,405.59	107,973.91	226,488.66	
	210	Political Subdivisions								243,293.28
	21000	10	26	199,943.00	.00	100,000.00	56,706.72	.00	43,236.28	
	21000	88	26	100,057.00	.00	.00	.00	.00	100,057.00	
				300,000.00		100,000.00	56,706.72		143,293.28	
	211	Revolving Fund – Specifically for IT/Tech Related Expenses								334,021.73
	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	151,544.00	.00	35,348.88	101,076.16	.00	15,118.96	
				548,770.00		41,352.08	108,094.61	136,752.82	262,570.49	
	212	Guardian Replacement Fund								1,234,688.72
	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	300,562.50	206,426.50	.00	508,011.00	
				2,215,000.00		402,104.62	420,921.28	544,390.00	847,584.10	
	Grand Totals			6,459,196.00	-	712,022.54	1,150,266.00	2,566,703.73	2,030,203.73	3,057,916.96



Budget

As of December 31, 2025

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	417,191	350,904.78	0.00	0.00	350,904.78	483,477.22	66,286.20	42.06	84.11
512 Insur.Prem-Hlth-Life,etc	147,054	73,527	34,343.76	1,139.88	0.00	35,483.64	111,570.36	38,043.36	24.13	48.26
513 FICA-Retirement Contributi	196,200	98,100	82,932.08	0.00	0.00	82,932.08	113,267.92	15,167.80	42.27	84.54
515 Professional Services	65,687	32,843	61,610.68	120,098.88	0.00	181,709.56	-116,022.56	-148,866.28	276.63	553.26
519 Inter/Intra Agy Pmt-Pers S	432	216	323.75	108.25	0.00	432.00	0.00	-216.00	100.00	200.00
521 Travel - Reimbursements	14,600	7,300	3,449.02	0.00	0.00	3,449.02	11,150.98	3,850.76	23.62	47.25
522 Travel - Agency Direct Pmt	7,400	3,700	-89.79	0.00	0.00	-89.79	7,489.79	3,789.69	-1.21	-2.43
531 Misc. Administrative Expen	16,415	8,207	3,956.06	9,720.32	0.00	13,676.38	2,738.62	-5,469.10	83.32	166.64
532 Rent Expense	700	350	804.79	0.00	0.00	804.79	-104.79	-454.87	114.97	229.99
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	2,950	1,277.88	0.00	0.00	1,277.88	4,622.12	1,672.02	21.66	43.32
552 Scholar.,Tuition,Incentive	25	12	33.53	0.00	0.00	33.53	-8.53	-21.05	134.12	268.67
601 AFP Encumbrances	0	0	0.00	16,719.77	0.00	16,719.77	-16,719.77	-16,719.77	~	~
810 Req Only	0	0	0.00	162,299.80	0.00	162,299.80	-162,299.80	-162,299.80	~	~
	1,288,795	644,396	539,984.92	310,086.90	0.00	850,071.82	438,723.18	-205,675.42	65.96	131.92
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	507,315	464,137.80	225.00	0.00	464,362.80	550,267.20	42,952.02	45.77	91.53
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	36,360	19,140.40	209,804.90	0.00	228,945.30	-156,223.30	-192,585.18	314.82	629.66
21000 Political Subdiv Enforcemt	199,943	99,971	56,706.72	100,000.00	0.00	156,706.72	43,236.28	-56,735.26	78.38	156.75
21100 Ethics Comm Online Filing	1,500	750	0.00	0.00	0.00	0.00	1,500.00	750.00	0.00	0.00
	1,288,795	644,396	539,984.92	310,086.90	0.00	850,071.82	438,723.18	-205,675.42	65.96	131.92
Totals for Division 10	1,288,795	644,396	539,984.92	310,086.90	0.00	850,071.82	438,723.18	-205,675.42	65.96	131.92



Budget

As of December 31, 2025

IS Services

Department: 8800020 Administrative IS Services

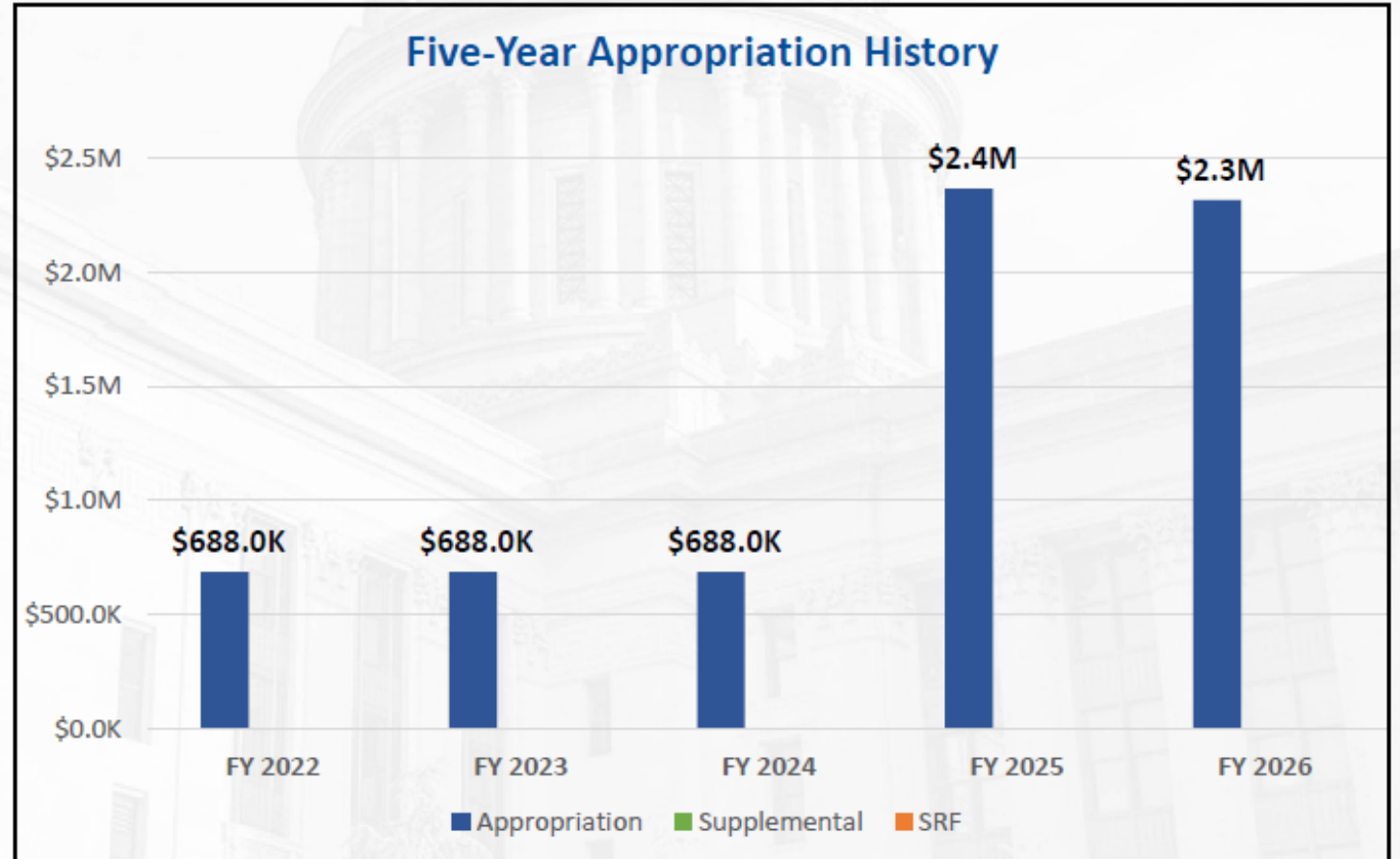
Account	Annual Budget	YTD Budget	Expenses	Encumbrance	Pre-Encumbrance	Total Exp, Enc, Pre-Enc	Annual Variance	YTD Variance	Annual %	YTD %
511 Salary Expense	71,062	35,531	37,612.80	0.00	0.00	37,612.80	33,449.20	-2,081.82	52.93	105.86
512 Insur.Prem-Hlth-Life,etc	14,820	7,410	6,700.68	0.00	0.00	6,700.68	8,119.32	709.32	45.21	90.43
513 FICA-Retirement Contributi	17,524	8,762	8,978.32	0.00	0.00	8,978.32	8,545.68	-216.40	51.23	102.47
515 Professional Services	742,561	371,280	220,638.80	316,461.32	0.00	537,100.12	205,460.88	-165,819.70	72.33	144.66
531 Misc. Administrative Expen	296,434	148,217	6,919.00	6,322.54	0.00	13,241.54	283,192.46	134,975.38	4.47	8.93
532 Rent Expense	3,500	1,750	2,001.52	1,072.71	0.00	3,074.23	425.77	-1,324.27	87.84	175.67
533 Maintenance & Repair Expen	117,100	58,550	24,291.74	10,903.51	0.00	35,195.25	81,904.75	23,354.73	30.06	60.11
535 Production,Safety,Security	0	0	34.29	0.00	0.00	34.29	-34.29	-34.29	~	~
536 General Operating Expenses	0	0	325.51	414.00	0.00	739.51	-739.51	-739.51	~	~
541 Office Furniture & Equipme	3,600	1,800	0.00	0.00	0.00	0.00	3,600.00	1,800.00	0.00	0.00
601 AFP Encumbrances	0	0	0.00	737.30	0.00	737.30	-737.30	-737.30	~	~
810 Req Only	0	0	0.00	0.00	12,819.90	12,819.90	-12,819.90	-12,819.90	~	~
	1,266,601	633,300	307,502.66	335,911.38	12,819.90	656,233.94	610,367.06	-22,933.76	51.81	103.62
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	50,028	0.00	0.00	0.00	0.00	100,057.00	50,028.48	0.00	0.00
21100 Ethics Comm Online Filing	151,544	75,772	101,076.16	35,348.88	0.00	136,425.04	15,118.96	-60,653.26	90.02	180.05
21200 Ethics Com Fil Sys Replcmn	1,015,000	507,500	206,426.50	300,562.50	0.00	506,989.00	508,011.00	510.92	49.95	99.90
	1,266,601	633,300	307,502.66	335,911.38	12,819.90	656,233.94	610,367.06	-22,933.76	51.81	103.62
Totals for Division 88	1,266,601	633,300	307,502.66	335,911.38	12,819.90	656,233.94	610,367.06	-22,933.76	51.81	103.62
Totals for Bus Unit 29600	2,555,396	1,277,697	847,487.58	645,998.28	12,819.90	1,506,305.76	1,049,090.24	-228,609.18	58.95	117.89



OKLAHOMA
Ethics Commission

Appropriation History

Fiscal Year	Legislated Appropriation (\$) <i>(Includes supplementals and SRF/ARPA.)</i>
FY 2022	687,957
FY 2023	687,957
FY 2024	687,957
FY 2025	2,364,630
FY 2026	2,314,630



**Includes Supplemental and Statewide Recovery Fund (ARPA) appropriations.*



Financial Resource Analysis

Carryover	FY 2022	FY 2023	FY 2024	FY 2025
Total appropriated carryover amount expended (\$) *Agency not allowed carry-over of appropriations	\$0	\$0	\$0	\$0

Historical Cash Balances	FY 2022	FY 2023	FY 2024	FY 2025
Year End Revolving Fund Cash Balances <i>(All Revolving Funds)</i>	\$585,457	\$608,317	\$796,858	\$1,763,739

Revolving Class Fund # <i>(Unrestricted only)</i>	Revolving Class Fund Name <i>(Unrestricted only)</i>	Current cash balance (\$)	Projected FY 2026 year-end cash balance (\$)
#20000	Ethics Revolving Fund	\$671,140	\$751,692
#21000	Political Subdivision Enforcement Fund	\$244,395	\$0
#21100	Ethics Commission Online Filing Revolving	\$358,921	\$705,079
#21200	Ethics Commission Filing System Replacement	\$1,394,485	\$641,970
	Total Unrestricted Revolving Fund Cash balance:	\$2,668,941	\$2,098,741

Accomplishments

Top accomplishments for FY 2025 – FY 2026



1. Expanded Compliance Training & Outreach

- Delivered a **92% increase in educational opportunities**, including expanded virtual training statewide.
- Enhanced online guidance through updated FAQs, clearer instructional materials, and timely Advisory Opinions.
- Resulted in **measurable compliance gains**, including a **25% reduction in administrative fines** and a **49% decrease in complaints and investigations**.

2. Advanced Political Subdivision Engagement

- Prepared a **statewide informational campaign launching January 2026** to support political subdivision compliance.
- Partnered with the Oklahoma Municipal League (OML) and Oklahoma State School Boards Association (OSSBA) to reach local officials through trusted channels.
- Engaged municipal and school district filers early to encourage participation, improve understanding, and support a smooth transition into reporting requirements.

3. Established Ethics Commission Advisory Group

- Created a formal advisory group to strengthen engagement with the regulated community and stakeholders most impacted by Commission decisions.
- Provides structured feedback on **rule review, strategic planning, policy considerations, and system usability**.
- Enhances transparency, informed governance, and public trust through ongoing stakeholder input.

**These accomplishments reflect the Commission's focus on education-first compliance, responsible oversight, and measurable results.*



Goals and Key Performance Metrics

Goal		Metric	FY 25 Target	FY 25 Actuals	FY 26 Target
1	Accountability, Performance, & Governance Focus: Ensuring the Commission operates as a high-performing, accountable agency.	Performance Measure Completion: Strategic Initiative Completion Rate – Number of strategic initiatives reaching an approved milestone/total initiatives scheduled for the year	>80% of scheduled initiatives reach scheduled milestone	70%	80%
2	Build Internal Capacity & Organizational Excellence Focus: Staff development, governance, internal systems, and operational stability.	Retention/Stability Rate: Annual staff turnover rate and budget variance from appropriation.	Turnover < 18%; budget variance within 3%	18%/3%	18%/3%
3	Strengthen Compliance, Oversight & Enforcement Focus: Ensuring accurate disclosures, preventing violations, and maintaining accountability.	On-Time Filing Compliance Rate: Percentage of complaints and reports triaged within 5 business days of receipt.	>90%	90%	95%
4	Strengthen Compliance, Oversight & Enforcement Focus: (Same as above)	Corrective/Diversion Resolution Rate: Matters resolved through diversion or corrective action/total matters resolved.	45-60%	49%	55%
5	Modernize Systems & Enhance Access Focus: Technology modernization, system reliability, and user experience (especially relevant to Guardian).	System Continuity Assurance: Percentage of required constitutional functions maintained through interim systems or procedures.	100% continuity	100%	80%
6	Promote Public Trust & Transparency Focus: Increasing clarity, openness, and confidence in OEC processes.	Education and Transition Support: Number of trainings, guidance releases, and stakeholder updates related to system transition and filer compliance	>15-20 outputs annually	15	20



Guardian Replacement

Ethics Commission Actions to Preserve Campaign Finance Transparency

► Notification & Stabilization Early Awareness & Continuity

- Legacy vendor notified Commission in Fall 2023 that System support and access would end in Summer 2024
- System replacement project initiated with defined contractual milestones
- Commission proactively directed multiple extensions of the legacy system to preserve public access

► Protect the Public Transparency Never Ceased

- Beta access restricted to functions that met legal and data-accuracy standards
- No penalties imposed for filings affected by system availability
- Campaign Finance Records provided upon request

► Escalation & Validation Oversight & Accountability

- Vendor repeatedly missed contractual deliverables and “Go-Live” commitments
- Formal written warnings issued and contractual remedies pursued
- Commission engaged OMES for independent technical assessment

► Decide & Act Responsible Stewardship

- Determined vendor unable to deliver a timely, complaint system
- Commission independently pursued interim solutions
- Restored legacy Guardian system (under new leadership) to immediately resume lawful filing and public access





FY 2026 Appropriation Change Review

<i>Purpose of appropriation increase or decrease</i>	<i>Amount of increase or decrease (\$)</i>	<i>Does this need to be included in your FY 2027 appropriation? (Yes/No)</i>	<i>If yes, included in appropriation for same purpose? (Yes/No)</i>	<i>If not included for same purpose, please explain.</i>
Political Subdivision Compliance	\$300,000	Yes	Yes	
Guardian 2.0 Implementation	\$1,000,000	No		One-Time Funding Request
Total adjustment	-\$700,000			

**Total FY 2027 OEC Budget Request :
\$1,164,630**



Legislative Update

Legislation Carried over from 2025 Session

- **HB 1351** Requires state agency officials to disclose certain communications related to state budget discussions with members of the Legislature, such disclosure to be made to the Ethics Commission and thereafter made public. [Gann, Tom(R)]
- **HB 1448** Requires all campaign or election materials which are not official notices from state or local government to include disclaimers meeting certain standards which clarify that they are not official documentation. [Crosswhite-Hader, Denise(R); Sacchieri, Kendal (F)(R)]
- **SB 82** Requires mandatory ethics training sessions for elected legislators, to be supervised by each chamber's leadership. [Kirt, Julia]
- **SB 660** 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, Brian]
- **SB 763** Directs the Ethics Commission to promulgate rules to require the reporting of expenditures for municipal ballot measure communications. [Nice, Nikki]
- **SB 1051** Creates the Campaign Expenditures Transparency Act which requires anyone paying for certain election related advertisements or communication to make disclosures to the Ethics Commission. [Deevers, Dusty]

Legislative Update

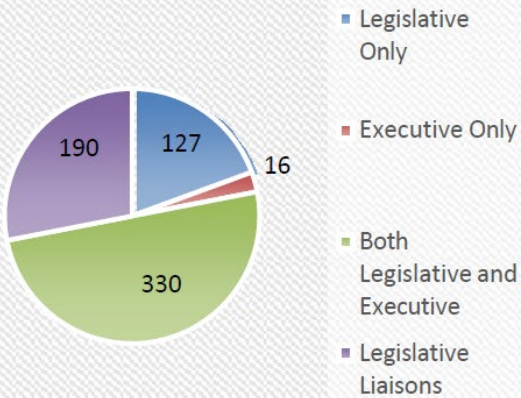
Newly Filed Legislation

- **SB 1199** Clarifies prohibitions for school boards to enter into a contact with a company/individual/business a member of the board or a member of his or her immediate family owns a 5 percent or more interest. [Sacchieri, Kendal]
- **SB 1200** Prohibits Individuals from being eligible to be a candidate for a school district or technology center school district board of education if he or she has an interest of 5% or more in a company, individual, or business concern engaged in the issuance of bonds for school districts. [Sacchieri, Kendal]
- **SB 1206** Public may address a public body on any item on the Agenda at a Public Meeting at a designated time. [Prieto, Dana]
- **SB 1252** Public Body must provide reasonable opportunity for public comment on each agenda item prior to taking any official action on the item. [Guthrie, Brian]

Compliance Update

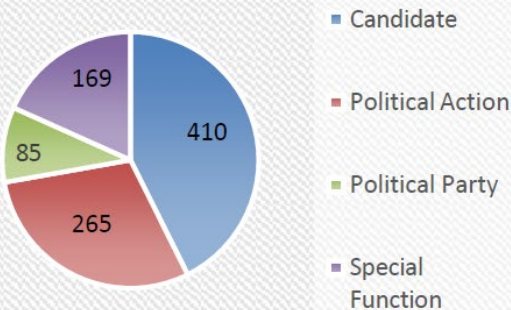
THE GUARDIAN SYSTEM REGISTRANTS Active Filers as of July 1, 2025

Lobbyists



Total Lobbyists: 663

Committees



Total Committees: 929

Total Lobbyists and Committees: 1,592

Upcoming Reporting Schedules

Lobbyist/Liaison

Executive Only
Lobbyist
3rd Quarter –
January 14, 2026

Executive Only
Lobbyist
4th Quarter –
January 15, 2026

Legislative
Lobbyist/Liaison
2025 July-
December -
January 15, 2026

Candidates & Non-Candidate Committees

2025 3rd Quarter Due
January 30, 2026
(Candidates and non-
Candidate Committees)

2025 4th Quarter Due
January 31, 2026
(Candidates and non-
Candidate Committees)

2026 Special Election HD 35
Pre-Primary Reports Due
January 31, 2026



OKLAHOMA
Ethics Commission

Compliance Update

COMPLIANCE ACTIVITY TRACKER				
DATE – DECEMBER 2025				
	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	135	54	73	69
REPORTS REVIEWED	0	0	0	0
EMAIL CORRESPONDENCE	250	183	73	234
TOTALS	385	237	146	303

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



OKLAHOMA
Ethics Commission

Guardian Update

Transitioned
back to Legacy
Vendor

Established
Updated
Reporting
Deadlines

Change Request
for Political
Subdivisions

Gearing up for
2026 Election
Cycle





Risk Based Audits

- Comprehensive audits will be conducted for the accounts of the Top 10 from the Contributions & Expenditures lists for the 2026 State Campaign Committee 3rd & 4th Quarter Reports



00001-Ryan

Complaint Regarding Campaign Signs on State Property.

Dashboard

Custom Fields

Activities

Calendar

Communications

Notes

Documents

Tasks

Bills

Transactions

Clio for Co-Counsel

Activities and Grants: (USD)

Manage payment methods

Details

Matter description

Complaint Regarding Campaign Signs on State Property.

Responsible attorney

Margaret Kerr

Responsible staff

La Shounda Faye

Permissions

Firm

Blocked users

—

Originating attorney

—

Matter notifications

Margaret Kerr, La Shounda Faye

Practice area

Administrative

Matter stage

—

Client reference number

C-26-00

Location

—

Status

Open

Open date

01/14/2026

Pending date

—

Closed date

—

Limitations date

—

Billable

No

Conflict Checks

Link conflict check

Run conflict check

No conflict checks associated with this matter.

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Contacts

Export

MR

Meg Ryan

Phone

555-555-5555 (Other)

Email

lashounda.faye@ethics.ok.gov (Other)

Address

2300 N. Lincoln Blvd. Room G-27
Oklahoma City, OK 73105
United States (Other)

Related contacts (0)

Add

Timeline

Filters

Jan 14, 2026

La Shounda Faye modified permissions to 'Everyone' .
2:55 pm

My calendars

La Shounda Faye

Firm

Tasks

Statute of Limitations

Other calendars

00:00:00

Create new +

0

Search Oklahoma Ethics Commission

Today

Jan 11 - 17, 2026

Agenda

Day

Week

Work week

Month

More

New event

January 2026

Investigation 10:30 AM 00001-Ryan: Complaint Regarding Campa...

Investigation 10:30 AM 00001-Ryan: Complaint Regarding Campa...



OKLAHOMA
Ethics Commission



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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:

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



OKLAHOMA

Ethics Commission



Commission Meeting
January 15, 2026 10:00 AM
OK State Capitol, Rm. G-3



Executive Session



OKLAHOMA

Ethics Commission



Commission Meeting
January 15, 2026 10:00 AM
OK State Capitol, Rm. G-3



Returning Soon From
Executive Session



OKLAHOMA

Ethics Commission



Commission Meeting
January 15, 2026 10:00 AM
OK State Capitol, Rm. G-3

Possible Action Following Executive Session

RFD & Associates, Inc.; discussion of potential claims and cause(s) of action.

**Case No. 2022-25, alleging
violations of Campaign Finance
Ethics Rule 2; State of
Oklahoma ex rel. Oklahoma
Ethics Commission v. Pittman,
Oklahoma County District
Court, Case No. CV-2025-2636.**

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

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

C-25-18

C-25-23

C-26-01

No Action On:

Case No. 2022-25; Case No. CV-2025-2636

C-25-18



OKLAHOMA
Ethics Commission



New Business



Adjournment



Next Regularly Scheduled
Commission Meeting
February 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

