



# OKLAHOMA

## Ethics Commission



Special Commission Meeting  
June 5, 2026 10:00 AM  
OK State Capitol, Rm. G-3



**OKLAHOMA**  
Ethics Commission



**Call to Order**



**Open Meeting Act Compliance**



**Introductions & Announcements**



**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 May 14, 2026**

**Consideration, discussion, and possible action regarding the rescission of Advisory Opinion 2019-01 (Cited as: 2019 OK Ethics 01), concerning Campaign Finance Rules 2.48 and 2.116, including the extension of mandatory dissolution deadlines and the establishment of mandatory dissolution dates for candidate committees.**

# Rescission of Advisory Opinion 2019-01 concerning 2.48 and 2.116

**Ethics Rule 2.48 & 2.116** were amended by modifying the provision for committees with funds remaining at the time of dissolution and extending time for dissolution to **1 Year from 90 days**



## OKLAHOMA ETHICS COMMISSION

PHONE: (405) 521-3451 • FAX: (405) 521-4905 • WEBSITE: [WWW.ETHICS.OK.GOV](http://WWW.ETHICS.OK.GOV)

### Advisory Opinion 2019-01 (Cite as: 2019 OK Ethics 01)

Dear Ms. Hoskin:

We are responding to your advisory opinion request relating to Ethics Rule 2, establishing rules of ethical conduct for elective state office and for campaigns for state initiatives and referenda.<sup>1</sup> You ask, in effect, the following question:

Does Ethics Rule 2.48 extend by 90 days the mandatory dissolution date established by Ethics Rule 2.116 for an officeholder's candidate committee to dissolve?

Therefore, it is the official opinion of the Ethics Commission that:

1. Ethics Rule 2.116 establishes the mandatory dissolution dates for candidate committees.
2. Candidate committees that have no funds remaining in the committee's campaign depository are required to dissolve and file a final report by the mandatory dissolution date.
3. Candidate committees with funds remaining in the committee's campaign depository on the mandatory dissolution date established in Rule 2.116 may no longer receive contributions or make expenditures for contributions to other candidate committees, campaign expenses, or operating expenses.
4. Candidate committees with funds remaining in the committee's campaign depository on the mandatory dissolution date established in Rule 2.116 may
  - a. for elected officers, (1) make expenditures for officeholder expenses until the officeholder's term of office is completed or the office is vacated; and (2) make expenditures for surplus funds as provided for in Rule 2.48 for ninety (90) days after the officeholder's term is completed or vacated; or
  - b. for unelected candidates, make expenditures for 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.
5. After the ninety (90) day timeframe has ended the only option for expenditure of remaining funds in a candidate committee's depository account is payment to the state's general revenue fund.

**Consideration, discussion and possible  
action regarding a proposed rule  
requiring disclosure of artificial  
intelligence generated political ads.**

# Proposed rule requiring disclosure of artificial intelligence generated political ads

- **Artificial intelligence (AI):** The use of computer systems to perform tasks that normally require human intelligence, such as learning and decision-making—has the potential to transform our economy and how citizens live and work. While its roots trace back to the work of Alan Turing and the phrase “artificial intelligence” was originally coined at a computer science conference at Dartmouth College in 1956, ***there’s still no consensus on a uniform definition of AI.***



- Concerns about potential misuse or unintended consequences of AI, however, have prompted state lawmakers to move ahead to address potential harms from these technologies, while still promoting innovation. The lack of an overarching definition can be challenging to policymakers as they seek to create a regulatory framework. The fact that AI is still a developing field can make it difficult to reach consensus on how to define exactly what AI is and is not.

## Proposed rule requiring disclosure of artificial intelligence generated political ads



## Proposed rule requiring disclosure of artificial intelligence generated political ads

36 states have enacted laws regulating the use of deepfakes in political messaging. States have generally taken two approaches: prohibitions and disclosures.

- Two states (Minnesota and Texas) prohibit the publication of political deepfakes a certain number of days prior to an election.
- Maryland has no time limit and instead prohibits deceptive deepfakes related to the election year-round.
- The other 27 states require disclosures on the media, like those required for who paid for a political ad, stating if it contains a deepfake.
- Colorado and Utah require additional disclosures in the meta data —descriptive information about a file’s creator, when the file was created and when the file was edited.

# Proposed rule requiring disclosure of artificial intelligence generated political ads

## Constitutional Considerations

Recent federal court decisions reviewing AI/deepfake election laws have generally focused on **restrictions** placed on political speech, **rather than disclosure** requirements alone. Courts have expressed concerns regarding:

- Vague or overbroad definitions of prohibited content;
- Restrictions based on speculative harm to a candidate's electoral prospects;
- Requirements that unduly burden satire, parody, or other protected political speech;
- Broad private rights of action.

Courts have suggested that regulations aimed at preventing concrete harms, such as voter deception, intimidation, coercion, or interference with the electoral process, may be more likely to withstand constitutional scrutiny.

**Any Commission proposal should be carefully tailored to advance transparency while minimizing burdens on protected political expression.**

*\*See California and Hawaii federal district court decisions striking down portions of state AI/deepfake election laws on First Amendment grounds. These decisions primarily addressed restrictions on political speech and compelled speech requirements rather than campaign-finance-style disclosure provisions.*

# Proposed rule requiring disclosure of artificial intelligence generated political ads

## Considerations

### Artificial Intelligence (AI) in Elections and Campaigns (National Conference of State Legislators)

- **Definitions:** How is a deepfake defined? Is it defined by a certain type of model—generative adversarial networks, diffusion, something else? Does the definition encompass only deepfakes or does it also capture media created by other means like photoshop?
- **Regulations:** How is the law regulating deepfakes in political messaging? Is there a disclosure requirement, prohibition, both or something else? Are these regulations only in effect for a certain period of time before an election or are they always in effect? Does regulation affect all deepfakes, deepfakes that affect the election, must the deepfake cause harm?
- **Exemptions:** Who is exempt from the law? Many states exempt parody, satire, and media who republish the deepfake to cover a story. Are including disclosures on the deepfake considered a safe harbor (protection from liability)?
- **Penalties:** Are penalties civil, criminal or both? Who has the ability to sue or seek injunctive relief—candidates, attorney general, anyone depicted? Are penalties enhanced under certain conditions like if a deepfake was created with the intention of causing violence? Is enforcement purely through civil action or is a government office or agency responsible for identifying and pursuing action?

# Proposed rule requiring disclosure of artificial intelligence generated political ads

## Criminal Law: 21 O.S. § 1040.13b (OSCN 2026)

1. “**Artificial intelligence**” means a machine-based system that can, for a given set of human-defined objectives, make predictions, recommendations, or decisions influencing real or virtual environments, including the ability to:
  - a. perceive real and virtual environments,
  - b. abstract perceptions made under this paragraph into models through analysis in an automated manner, and
  - c. use model inference to formulate options for information or action based on outcomes under subparagraphs a and b of this paragraph.

The term includes generative **artificial intelligence**;

3. “Generative **artificial intelligence**” means the class of models that emulate the structure and characteristics of input data in order to generate derived synthetic content, including information such as images, videos, audio clips, or text, that has been significantly modified or generated by algorithms, including by **artificial intelligence**;
4. “Image” includes a photograph, film, videotape, digital recording or other depiction or portrayal of an object, including a human body;
7. “Visual depiction” means any depiction, photograph, film, performance, or image displayed, stored, shared, or transmitted in any format and on any medium including data that is capable of being converted into a depiction, picture, movie, performance, or image.

# Proposed rule requiring disclosure of artificial intelligence generated political ads

ORDER ADOPTING NEW PROCEDURAL RULE IN THE COURT OF CRIMINAL APPEALS

## 22 O.S. Rule 1.17

### Rule 1.17 Use of Generative Artificial Intelligence

**A. Use.** When generative artificial intelligence ("generative AI") has been used in the drafting of any document for filing in this Court, the party, or their counsel, shall ensure that any portion of the document produced or modified by generative AI, whether in whole or in part, has been verified as accurate by a person responsible for the document.

**B. Definition.** For purposes of this Rule, "generative **artificial intelligence**" or "generative AI" is defined as any type of **artificial intelligence** that generates content or data in response to a prompt or query by a user.

**C. Sanctions.** Failure to comply with the above requirements may result in the imposition of sanctions by this Court including, but not limited to, waiver of the affected issue(s) on appeal, striking of a non-compliant document from the record, and/or a finding of contempt.

Issued in accordance with [2026 OK CR 7](#), eff. February 18, 2026.



## Proposed rule requiring disclosure of artificial intelligence generated political ads

### Optional Directions

|  |  |
|--|--|
| <b>No Action</b>   | Do not address AI at this time   |
| <b>Define AI</b>   | Address terms like Artificial Intelligence; Deepfake; Synthetic Media; Satire & Parody; Metadata; Disclaimer; etc.   |
| <b>Disclosure for All</b>  | Requires political messaging that contains synthetic media and requires certain campaign finance disclosures to include a disclosure that media has been manipulated or altered.   |
| <b>Disclosure for Intended Harm</b>                              | Requires materially deceptive media intended to harm the reputation and electoral prospects of a candidate to include a disclaimer stating that it has been manipulated.<br>If generated from existing media, it must include a citation directing a viewer to the unedited version. |
| <b>Disclosure within certain time frame prior to an election</b> | Requires synthetic media published within 60/90/120 days of an election to include a disclaimer stating that it was generated by AI.   |
| <b>MetaData Disclosure</b>                                       | Require the media's metadata to contain the disclosure statement, what tool was used to create the deepfake and the time the deepfake was created.   |

# Proposed rule requiring disclosure of artificial intelligence generated political ads

## ➤ Sample Language:

- Requires political messaging that contains synthetic media and requires certain campaign finance disclosures to include a disclosure that media has been manipulated or altered.
- Requires materially deceptive media intended to harm a candidate and deceive voters into voting for or against a candidate published within 90 days of an election to include a disclosure that the media has been manipulated.
- Requires synthetic media intended to influence the outcome of an election or solicit contributions to include a disclosure that it contains synthetic media.
- Requires deepfakes impersonating candidates to contain a disclosure stating the content did not actually occur. If the content depicts a candidate who is not an office holder or incumbent, the disclosure is only required 120 days before voting begins.
- Requires digitizations done without the consent of the individual depicted and intended to injure a candidate or influence an election published within 90 days of an election to contain a disclosure stating that the conduct or speech depicted did not actually occur.



# Executive Director's Report

## Request for Advisory Opinion under Ethics Rule 1.7 (Application of Rules 2.81 and 2.94) from Stand for Freedom PAC, a Federally-Registered Independent-Expenditure-Only Committee.

**Stand for Freedom PAC** is a political committee registered with the Federal Election Commission as an independent-expenditure-only committee. Its principal office is at 126 C Street NW, Third Floor, Washington, DC 20001. Its Treasurer lives in Georgia, not in Oklahoma. The Committee's officers and staff are all located outside Oklahoma, and it holds its funds in a deposit account at ServisFirst Bank, an FDIC-insured institution that serves clients across the Southeast. That account is maintained in Georgia, and ServisFirst Bank does not ordinarily conduct business in Oklahoma.

**The Committee intends to make independent expenditures in connection with the 2026 Oklahoma election cycle. It does not plan to contribute to any Oklahoma candidate or candidate committee. It has filed this request because it wants to follow Oklahoma law and needs to know which requirements apply to that activity.**

Applied as written, Rule 2.81 would require an Oklahoma-resident Treasurer and Rule 2.94 a depository at an institution doing business in Oklahoma. As a result, the Committee would face a hard choice: either replace its current Treasurer with an Oklahoma resident and open a new in-state bank account as the price of speaking in Oklahoma elections, or stay silent. The Committee respectfully submits that the Rules need not be applied to reach that result, and that they should not be.

## **Request for Advisory Opinion under Ethics Rule 1.7 (Application of Rules 2.81 and 2.94) from Stand for Freedom PAC, a Federally-Registered Independent-Expenditure-Only Committee.**

### **Summary Request**

The Committee respectfully asks the Commission to issue an advisory opinion that does two things: first, clarify whether Rules 2.81 and 2.94 apply to a federally-registered independent-expenditure-only committee that makes only independent expenditures in Oklahoma; and second, if they do apply, read them so that they do not require an Oklahoma-resident Treasurer or an in-state depository, in light of the less restrictive alternatives described above. I would be glad to provide any further information the Commission or its staff may need, and the Committee would welcome the chance to take part in the hearing process under Rule 1.7.



# Budget

As of June 2, 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                                     |             |                |                     |                       |                   |                       |                     |                         | 176,054.04            |
|                      | 19501  | 10          | 25             | 1,014,630.00        | .00                   | .00               | .00                   | 1,014,630.00        | .00                     |                       |
|                      | 19502  | 10          | 26             | 1,014,630.00        | 80,000.00             | 117.00            | 838,575.96            | .00                 | 95,937.04               |                       |
|                      |  |             |                | <u>2,029,260.00</u> | <u>80,000.00</u>      | <u>117.00</u>     | <u>838,575.96</u>     | <u>1,014,630.00</u> | <u>95,937.04</u>        |                       |
|                      | 200 - Revolving Fund   |             |                |                     |                       |                   |                       |                     |                         | 759,983.10            |
|                      | 20000  | 10          | 24             | 178,006.00          | .00                   | .00               | .00                   | 39,454.75           | 138,551.25              |                       |
|                      | 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                   | 24,569.22         | 42,569.36             | .00                 | 5,583.42                |                       |
|                      |  |             |                | <u>528,209.00</u>   |                       | <u>103,846.22</u> | <u>48,834.55</u>      | <u>107,973.91</u>   | <u>267,554.32</u>       |                       |
|                      | 210 - Political Subdivisions                                     |             |                |                     |                       |                   |                       |                     |                         | 217,155.41            |
|                      | 21000  | 10          | 26             | 199,943.00          | .00                   | 100,000.00        | 82,844.59             | .00                 | 17,098.41               |                       |
|                      | 21000  | 88          | 26             | 100,057.00          | .00                   | .00               | .00                   | .00                 | 100,057.00              |                       |
|                      |  |             |                | <u>300,000.00</u>   |                       | <u>100,000.00</u> | <u>82,844.59</u>      |                     | <u>117,155.41</u>       |                       |
|                      | 211 - Revolving Fund – Specifically for IT/Tech Related Expenses |             |                |                     |                       |                   |                       |                     |                         | 427,363.81            |
|                      | 21100  | 10          | 26             | 1,500.00            | .00                   | .00               | .00                   | .00                 | 1,500.00                |                       |
|                      | 21100  | 88          | 24             | 164,186.00          | .00                   | .00               | .00                   | 76,129.56           | 88,056.44               |                       |
|                      | 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                   | 136,341.47        | 207,734.08            | .00                 | 53,419.98               |                       |
|                      |  |             |                | <u>794,721.53</u>   |                       | <u>138,349.01</u> | <u>214,752.53</u>     | <u>136,752.82</u>   | <u>304,867.17</u>       |                       |
|                      | 212 - Guardian Replacement Fund                                  |             |                |                     |                       |                   |                       |                     |                         | 1,198,678.72          |
|                      | 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                   | 297,552.50        | 242,436.50            | .00                 | 475,011.00              |                       |
|                      |  |             |                | <u>2,215,000.00</u> |                       | <u>399,094.62</u> | <u>456,931.28</u>     | <u>544,390.00</u>   | <u>814,584.10</u>       |                       |
|                      | <b>Grand Totals</b>  |             |                | <u>6,705,147.53</u> | <u>80,000.00</u>      | <u>741,406.85</u> | <u>1,716,938.91</u>   | <u>2,566,703.73</u> | <u>1,600,098.04</u>     | <u>2,779,235.08</u>   |



# Budget

As of June 2, 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       | 764,850    | 651,135.41 | 0.00        | 0.00            | 651,135.41              | 183,246.59      | 113,714.72   | 78.04    | 85.13  |
| 512 Insur.Prem-Hlth-Life,etc     | 147,054       | 134,800    | 59,471.50  | 1,139.88    | 0.00            | 60,611.38               | 86,442.62       | 74,188.12    | 41.22    | 44.96  |
| 513 FICA-Retirement Contributi   | 196,200       | 179,850    | 153,801.91 | 0.00        | 0.00            | 153,801.91              | 42,398.09       | 26,047.87    | 78.39    | 85.52  |
| 515 Professional Services        | 65,687        | 60,213     | 73,867.45  | 107,938.30  | 0.00            | 181,805.75              | -116,118.75     | -121,593.07  | 276.78   | 301.94 |
| 519 Inter/Intra Agy Pmt-Pers S   | 432           | 396        | 723.19     | 83.66       | 0.00            | 806.85                  | -374.85         | -410.85      | 186.77   | 203.75 |
| 521 Travel - Reimbursements      | 14,600        | 13,383     | 5,922.05   | 0.00        | 0.00            | 5,922.05                | 8,677.95        | 7,460.88     | 40.56    | 44.25  |
| 522 Travel - Agency Direct Pmt   | 7,400         | 6,783      | 782.25     | 0.00        | 0.00            | 782.25                  | 6,617.75        | 6,000.90     | 10.57    | 11.53  |
| 531 Misc. Administrative Expen   | 16,415        | 15,047     | 14,192.57  | 3,305.16    | 80,000.00       | 97,497.73               | -81,082.73      | -82,451.05   | 593.96   | 647.97 |
| 532 Rent Expense                 | 700           | 642        | 1,019.44   | 0.00        | 0.00            | 1,019.44                | -319.44         | -377.92      | 145.63   | 158.91 |
| 534 Specialized Sup & Mat.Expe   | 0             | 0          | 466.28     | 0.00        | 0.00            | 466.28                  | -466.28         | -466.28      | ~        | ~      |
| 535 Production,Safety,Security   | 0             | 0          | 14.00      | 0.00        | 0.00            | 14.00                   | -14.00          | -14.00       | ~        | ~      |
| 536 General Operating Expenses   | 5,900         | 5,408      | 2,539.83   | 0.00        | 0.00            | 2,539.83                | 3,360.17        | 2,868.32     | 43.05    | 46.96  |
| 552 Scholar.,Tuition,Incentive   | 25            | 23         | 54.03      | 0.00        | 0.00            | 54.03                   | -29.03          | -31.15       | 216.12   | 236.15 |
| 601 AFP Encumbrances             | 0             | 0          | 0.00       | 12,219.22   | 0.00            | 12,219.22               | -12,219.22      | -12,219.22   | ~        | ~      |
| 810 Req Only                     | 0             | 0          | 0.00       | 162,299.80  | 0.00            | 162,299.80              | -162,299.80     | -162,299.80  | ~        | ~      |
|                                  | 1,288,795     | 1,181,393  | 963,989.91 | 286,986.02  | 80,000.00       | 1,330,975.93            | -42,180.93      | -149,582.53  | 103.27   | 112.66 |
| 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     | 930,077    | 838,575.96 | 117.00      | 80,000.00       | 918,692.96              | 95,937.04       | 11,384.21    | 90.54    | 98.78  |
| 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        | 66,660     | 42,569.36  | 186,812.02  | 0.00            | 229,381.38              | -156,659.38     | -162,721.16  | 315.42   | 344.11 |
| 21000 Political Subdiv Enforcemt | 199,943       | 183,281    | 82,844.59  | 100,000.00  | 0.00            | 182,844.59              | 17,098.41       | 436.42       | 91.45    | 99.76  |
| 21100 Ethics Comm Online Filing  | 1,500         | 1,375      | 0.00       | 0.00        | 0.00            | 0.00                    | 1,500.00        | 1,375.00     | 0.00     | 0.00   |
|                                  | 1,288,795     | 1,181,393  | 963,989.91 | 286,986.02  | 80,000.00       | 1,330,975.93            | -42,180.93      | -149,582.53  | 103.27   | 112.66 |
| Totals for Division 10           | 1,288,795     | 1,181,393  | 963,989.91 | 286,986.02  | 80,000.00       | 1,330,975.93            | -42,180.93      | -149,582.53  | 103.27   | 112.66 |



# Budget

As of June 2, 2026

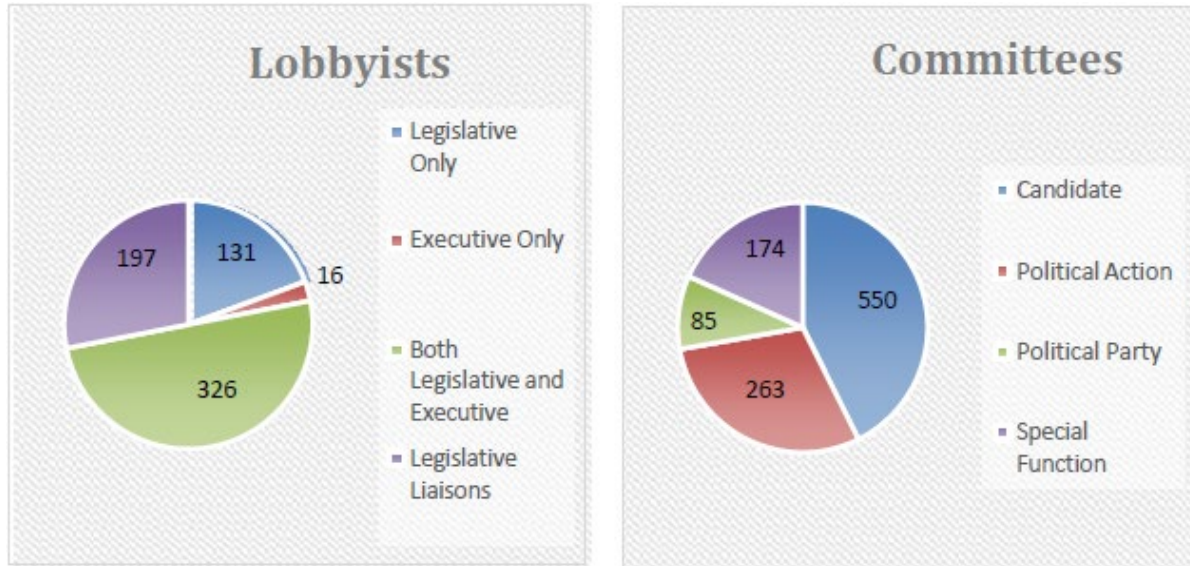
# IS Services

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        | 65,140     | 67,851.40    | 0.00        | 0.00            | 67,851.40               | 3,210.60        | -2,711.27    | 95.48    | 104.16  |
| 512 Insur. Prem-Hlth-Life, etc   | 14,820        | 13,585     | 12,758.58    | 0.00        | 0.00            | 12,758.58               | 2,061.42        | 826.42       | 86.09    | 93.92   |
| 513 FICA-Retirement Contributi   | 17,524        | 16,064     | 16,210.54    | 0.00        | 0.00            | 16,210.54               | 1,313.46        | -147.02      | 92.50    | 100.92  |
| 515 Professional Services        | 988,513       | 906,136    | 233,733.84   | 308,646.28  | 0.00            | 542,380.12              | 446,132.41      | 363,756.21   | 54.87    | 59.86   |
| 531 Misc. Administrative Expen   | 296,434       | 271,731    | 13,205.68    | 2,635.94    | 0.00            | 15,841.62               | 280,592.38      | 255,889.40   | 5.34     | 5.83    |
| 532 Rent Expense                 | 3,500         | 3,208      | 69,908.64    | 595.59      | 0.00            | 70,504.23               | -67,004.23      | -67,295.97   | 2014.41  | 2197.58 |
| 533 Maintenance & Repair Expen   | 117,100       | 107,342    | 34,239.04    | 9,456.21    | 0.00            | 43,695.25               | 73,404.75       | 63,646.38    | 37.31    | 40.71   |
| 535 Production, Safety, Security | 0             | 0          | 34.29        | 0.00        | 0.00            | 34.29                   | -34.29          | -34.29       | ~        | ~       |
| 536 General Operating Expenses   | 0             | 0          | 726.57       | 414.00      | 0.00            | 1,140.57                | -1,140.57       | -1,140.57    | ~        | ~       |
| 541 Office Furniture & Equipme   | 3,600         | 3,300      | 1,502.00     | 111,756.79  | 0.00            | 113,258.79              | -109,658.79     | -109,958.79  | 3146.08  | 3432.08 |
| 601 AFP Encumbrances             | 0             | 0          | 0.00         | 389.16      | 0.00            | 389.16                  | -389.16         | -389.16      | ~        | ~       |
| 810 Req Only                     | 0             | 0          | 0.00         | 0.00        | 12,819.90       | 12,819.90               | -12,819.90      | -12,819.90   | ~        | ~       |
|                                  | 1,512,553     | 1,386,506  | 450,170.58   | 433,893.97  | 12,819.90       | 896,884.45              | 615,668.08      | 489,621.44   | 59.30    | 64.69   |
| 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       | 91,719     | 0.00         | 0.00        | 0.00            | 0.00                    | 100,057.00      | 91,718.88    | 0.00     | 0.00    |
| 21100 Ethics Comm Online Filing  | 397,496       | 364,370    | 207,734.08   | 136,341.47  | 0.00            | 344,075.55              | 53,419.98       | 20,294.94    | 86.56    | 94.43   |
| 21200 Ethics Com Fil Sys Replcmn | 1,015,000     | 930,417    | 242,436.50   | 297,552.50  | 0.00            | 539,989.00              | 475,011.00      | 390,427.52   | 53.20    | 58.04   |
|                                  | 1,512,553     | 1,386,506  | 450,170.58   | 433,893.97  | 12,819.90       | 896,884.45              | 615,668.08      | 489,621.44   | 59.30    | 64.69   |
| Totals for Division 88           | 1,512,553     | 1,386,506  | 450,170.58   | 433,893.97  | 12,819.90       | 896,884.45              | 615,668.08      | 489,621.44   | 59.30    | 64.69   |
| Totals for Bus Unit 29600        | 2,801,348     | 2,567,899  | 1,414,160.49 | 720,879.99  | 92,819.90       | 2,227,860.38            | 573,487.15      | 340,038.91   | 79.53    | 86.76   |

# Compliance Update

## THE GUARDIAN SYSTEM REGISTRANTS Active Filers as of May 4, 2026



**Total Lobbyists: 670**

**Total Committees: 1072**

**Total Lobbyists and Committees: 1,742**

## Upcoming Reporting Schedules

### Lobbyist/Liaison

Legislative  
Lobbyist/Liaison  
2026 May – Due  
June 5, 2026

Executive Only  
Lobbyist  
2026 3<sup>rd</sup> Quarter –  
Due October 15,  
2026

Legislative  
Lobbyist/Liaison  
2026 June &  
Executive Only 2026  
2<sup>nd</sup> Quarter – Due  
July 15, 2026

### Candidates & Non-Candidate Committees

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

2026 Pre-Runoff  
Reports (2026  
Candidate Committees)  
- Due August 17, 2026

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

## Timely Report Submissions

- 98% of Lobbyist Report
- 94% of State Committee Reports

# Compliance Update

| COMPLIANCE ACTIVITY TRACKER                        |                     |            |            |                 |
|--|---------------------|------------|------------|-----------------|
| DATE – MAY 2026                                    |                     |            |            |                 |
|  | COMPLIANCE OFFICERS |            |            |                 |
|  | CO#1                | CO#2       | CO#3       | CO#4            |
| # STATE CANDIDATE OFFICES ASSIGNED*                | 119                 | 115        | 123        |                 |
| # OTHER COMMITTEE TYPES/LOBBYISTS ASSIGNED         | 384                 | 667        | 89         |                 |
| # POLITICAL SUBDIVISION OFFICE/DISTRICTS ASSIGNED* | 828                 | 1285       | 983        |                 |
| CALLS/WALK-INS                                     | 179                 | 83         | 105        |                 |
| REPORTS REVIEWED                                   | 9                   | 95         | 91         |                 |
| EMAIL CORRESPONDENCE                               | 604                 | 137        | 104        |                 |
| <b>TOTALS</b>                                      | <b>792</b>          | <b>315</b> | <b>300</b> | <b>(vacant)</b> |

\* These numbers reflect the number of offices assigned. The total number of candidates and officeholders per office varies daily.



➤ Compliance staff have screened a total of **1853 submissions to the portal**

**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.

- 368** Public Filings
- \$1,695,412.1** Total Contributions
- \$777,029.53** Total Expenditures

**OEC Compliance Review**  
Review submitted filings, approve for public access, or return for corrections

- 253** Pending Review
- 368** Approved (Public)
- 1464** Approved (Private)
- 1289** Returned

# Compliance Update

## Personal Financial Disclosures (For the calendar year 2025)

### Personal Financial Disclosure Guide



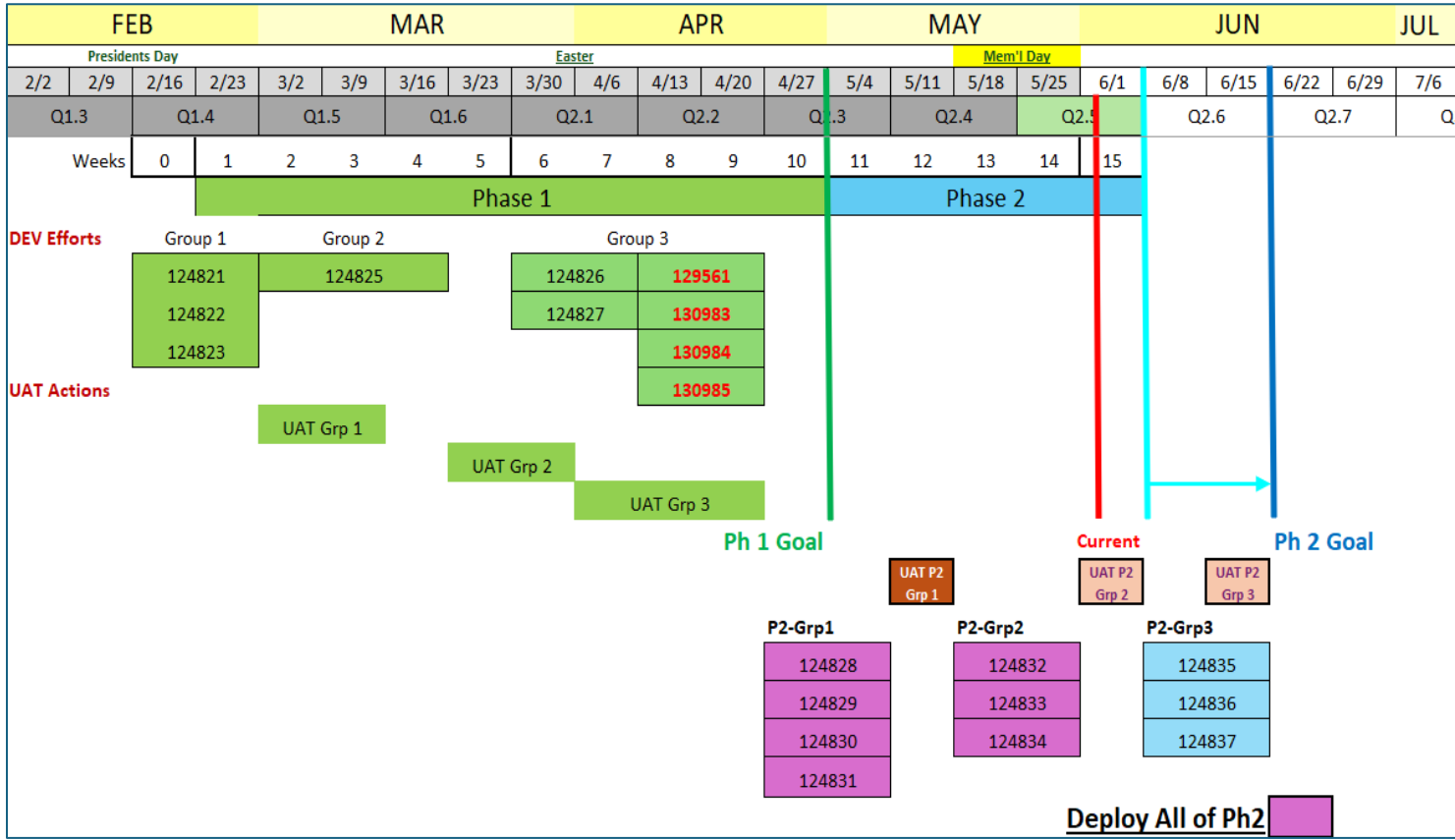
OKLAHOMA  
Ethics Commission

- At the State level, **394** PFDs were filed through the online Guardian system.
- At the Political Subdivision level, a total of **1832** PFDs were filed in through the Local Campaign Finance Transparency Portal



# Political Subdivision Integration

## Civix Timeline

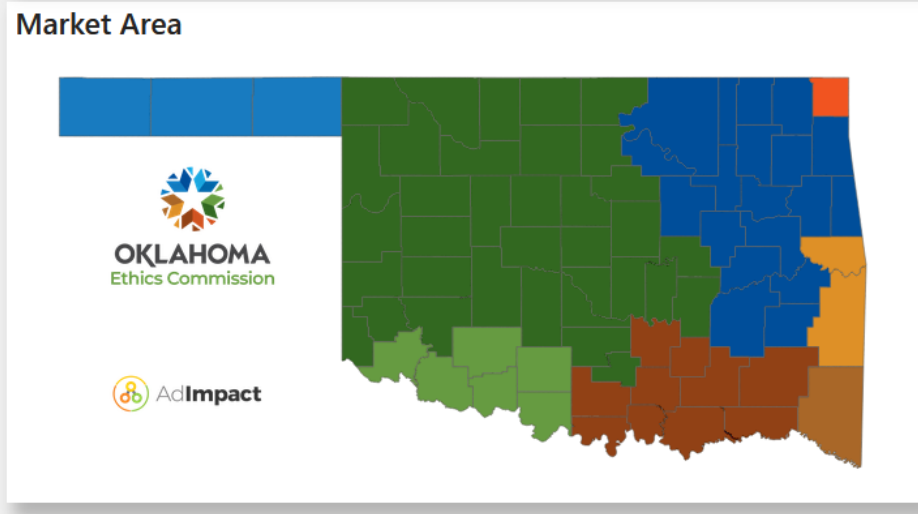
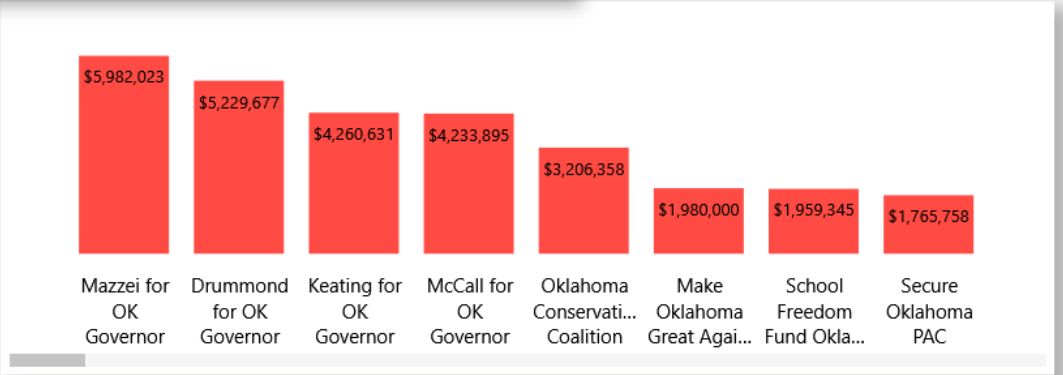
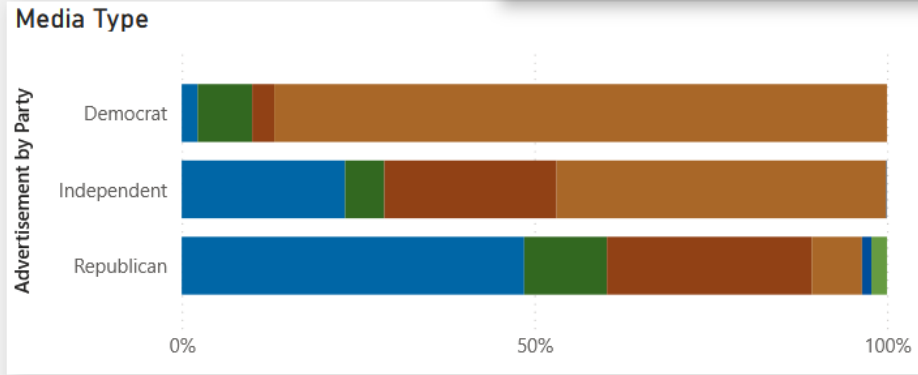


➤ Configured to accept filings for 2026 election dates, including the April & November general elections

# Campaign Advertisement Spending

Market: All | Race: All | Advertiser Party: All | Date: 1/1/2025 to 12/31/2026 | Active Election Related Campaigns: 106

Democrat: \$129,550 | Republican: \$33,407,929 | Independent: \$1,827,752



# Campaign Advertisement Spending

Broadcast TV | Cable TV | CTV | Digital | Radio | Satellite

| RACES                            |  |              |
|----------------------------------|--|--------------|
| OK Governor 2026                 |  | \$34,246,591 |
| OK Attorney General 2026         |  | \$8,315,825  |
| OK SQ832 Minimum Wage In...      |  | \$4,593,274  |
| OK CD-01 2026                    |  | \$2,567,893  |
| OK Senate 2026                   |  | \$2,436,123  |
| OK Lt. Governor 2026             |  | \$2,027,540  |
| OK CD-03 2026                    |  | \$584,944    |
| OK District Attorney District 14 |  | \$412,351    |
| OK Corporation Commissione...    |  | \$385,783    |
| OK Insurance Commissioner ...    |  | \$350,046    |
| OK CD-04 2026                    |  | \$297,057    |

## Total Spend on Oklahoma Campaigns

**\$59,429,831**

| STATES                       | MARKETS | DISTRICT     |
|------------------------------|---------|--------------|
| Oklahoma City, OK            |         | \$27,974,384 |
| Tulsa, OK                    |         | \$20,113,166 |
| Desktop/Mobile               |         | \$4,478,481  |
| Wichita Falls, TX -Lawto...  |         | \$2,169,076  |
| Sherman, TX - Ada, OK        |         | \$2,107,362  |
| Satellite                    |         | \$1,559,774  |
| Non Metro                    |         | \$363,054    |
| Ft. Smith-Fayetteville-Sp... |         | \$316,587    |

# Campaign Advertisement Spending

Total Spent on Oklahoma Campaigns: **\$59,429,831**

## Mazzei for OK Governor

Local Broadcast Spend: \$3,137,713  
 Local Cable Spend: \$1,021,017  
 CTV Spend: \$2,077,439  
 Digital Spend: \$484,128  
 Radio Spend: \$234,461  
 Satellite Spend: \$89,460

## McCall for OK Governor

Local Broadcast Spend: \$2,692,480  
 Local Cable Spend: \$812,206  
 CTV Spend: \$1,226,389

## Oklahoma Conservative Coalition

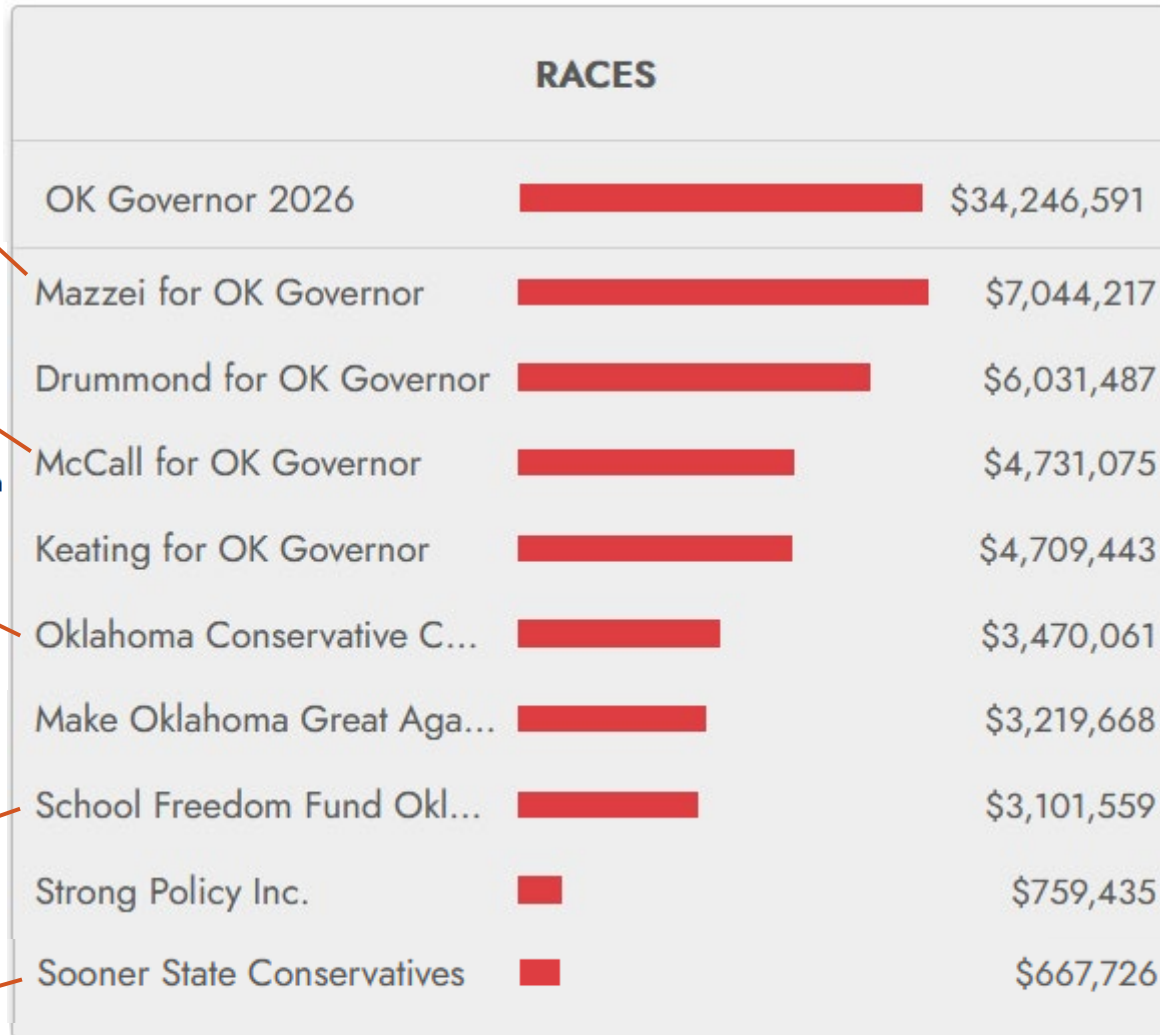
Local Broadcast Spend: \$1,976,875  
 Local Cable Spend: \$184,898  
 CTV Spend: \$822,267  
 Digital Spend: \$327,645  
 Satellite Spend: \$158,576

## School Freedom Fund Oklahoma

Local Broadcast Spend: \$1,824,995  
 Local Cable Spend: \$492,613  
 CTV Spend: \$290,970  
 Digital Spend: \$135,400  
 Radio Spend: \$158,525  
 Satellite Spend: \$199,056

## Sooner State Conservatives

Local Broadcast Spend: \$573,425  
 Local Cable Spend: \$43,619  
 CTV Spend: \$910  
 Satellite Spend: \$49,772



## Drummond for OK Governor

Local Broadcast Spend: \$2,037,440  
 Local Cable Spend: \$832,861  
 CTV Spend: \$2,515,981  
 Digital Spend: \$625,650  
 Satellite Spend: \$19,554

## Keating for OK Governor

Local Broadcast Spend: \$2,333,185  
 Local Cable Spend: \$312,827  
 CTV Spend: \$1,560,007  
 Digital Spend: \$435,935  
 Satellite Spend: \$67,489

## Make Oklahoma Great Again PAC

Local Broadcast Spend: \$2,134,135  
 Local Cable Spend: \$428,806  
 CTV Spend: \$362,442  
 Digital Spend: \$91,119  
 Radio Spend: \$69,052  
 Satellite Spend: \$134,114

## Strong Policy Inc.

Local Broadcast Spend: \$670,385  
 Local Cable Spend: \$63,846  
 CTV Spend: \$25,204

# Campaign Advertisement Spending

Total Spent on Oklahoma Campaigns: **\$59,429,831**

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## Keating for OK Governor










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 CTV Spend: \$25,204

| RACES                        |   |              |
|------------------------------|---|--------------|
| OK Governor 2026             |    | \$34,246,591 |
| STATES                       | MARKETS   | DISTRICT     |
| Oklahoma City, OK            |    | \$16,862,448 |
| Tulsa, OK                    |    | \$10,941,853 |
| Desktop/Mobile               |    | \$2,038,808  |
| Sherman, TX - Ada, OK        |    | \$1,550,722  |
| Wichita Falls, TX -Lawto...  |    | \$1,526,039  |
| Satellite                    |  | \$718,021    |
| Ft. Smith-Fayetteville-Sp... |  | \$300,108    |
| Non Metro                    |  | \$97,352     |

# Campaign Advertisement Spending

## Secure Oklahoma PAC

Local Broadcast Spend: \$2,636,200  
 Local Cable Spend: \$628,615  
 CTV Spend: \$351,013  
 Digital Spend: \$68,500  
 Satellite Spend: \$117,559

## Echols for OK Attorney General

Local Broadcast Spend: \$996,820  
 Local Cable Spend: \$161,666  
 CTV Spend: \$112,550  
 Satellite Spend: \$108,000

## ECHO PAC

Local Broadcast Spend: \$1,414,400  
 Local Cable Spend: \$248,635  
 CTV Spend: \$232,514  
 Digital Spend: \$58,100

## Starling for OK Attorney General

Local Broadcast Spend: \$715,923  
 CTV Spend: \$60,330  
 Digital Spend: \$34,700  
 Radio Spend: \$189,119  
 Satellite Spend: \$148,480

| RACES                         |  |             |
|-------------------------------|--|-------------|
| OK Attorney General 2026      |  | \$8,315,825 |
| Secure Oklahoma PAC           |  | \$3,801,887 |
| ECHO PAC                      |  | \$1,953,649 |
| Echols for OK Attorney Ge...  |  | \$1,379,036 |
| Starling for OK Attorney G... |  | \$1,148,552 |
| MARKETS                       |  |             |
| Oklahoma City, OK             |  | \$4,283,243 |
| Tulsa, OK                     |  | \$2,960,522 |
| Satellite                     |  | \$374,039   |
| Wichita Falls, TX -La...      |  | \$209,529   |
| Sherman, TX - Ada, ...        |  | \$179,850   |
| Desktop/Mobile                |  | \$161,300   |
| Non Metro                     |  | \$135,629   |

# Campaign Advertisement Spending

| RACES                       |             |
|-----------------------------|-------------|
| OK SQ832 Minimum Wage In... | \$4,593,274 |
| People for Opportunity      | \$2,940,757 |
| Oklahoma Raise the Wage     | \$1,652,518 |

## People for Opportunity

Local Broadcast Spend: \$1,270,865  
 Local Cable Spend: \$303,472  
 CTV Spend: \$936,840  
 Digital Spend: \$237,900  
 Satellite Spend: \$191,680

## Oklahoma Raise the Wage

Local Broadcast Spend: \$1,070,795  
 CTV Spend: \$434,418  
 Digital Spend: \$79,600  
 Satellite Spend: \$67,705



As of June 4, 2026

## Ostrowe for OK Lt. Governor

Local Broadcast Spend: \$356,420  
 Local Cable Spend: \$111,573  
 CTV Spend: \$23,810  
 Radio Spend: \$114,840

## Oklahoma Prosperity Fund

Local Broadcast Spend: \$590,520  
 CTV Spend: \$28,048  
 Satellite Spend: \$135,000

## Weaver for OK Lt. Governor

Local Broadcast Spend: \$114,217  
 Local Cable Spend: \$63,200  
 CTV Spend: \$573

## Shannon for OK Lt. Governor

Local Broadcast Spend: \$173,250  
 Local Cable Spend: \$177,418  
 CTV Spend: \$13,222

## Oklahoma State Medical Association

Local Broadcast Spend: \$4,085  
 CTV Spend: \$6,979  
 Digital Spend: \$14,387

## Shannon for OK Lt. Governor/ Pfeiffer for OK Labor Commissioner

Local Cable Spend: \$99,998

| RACES                       |             |
|-----------------------------|-------------|
| OK Lt. Governor 2026        | \$2,027,540 |
| Oklahoma Prosperity Fund    | \$753,568   |
| Ostrowe for OK Lt. Governor | \$606,643   |
| Shannon for OK Lt. Gover... | \$363,890   |
| Weaver for OK Lt. Governor  | \$177,990   |
| Shannon for OK Lt. Gover... | \$99,998    |
| Oklahoma State Medical A... | \$25,451    |

# Public Service Announcement Campaign



# Public Service Announcement Campaign



**OKLAHOMA**  
Ethics Commission

**Curious about candidates' campaign finances?**



**Check with the Ethics Commission.**



**OKLAHOMA**  
Ethics Commission

**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](https://ethicsok.com) to file today



**Local candidates. Statewide rules.**





# OKLAHOMA

## Ethics Commission



Special Commission Meeting  
June 5, 2026, 10:00 AM  
OK State Capitol, Rm. G-3



## Executive Session



# OKLAHOMA

## Ethics Commission



Special Commission Meeting  
June 5, 2026, 10:00 AM  
OK State Capitol, Rm. G-3



Returning Soon From  
Executive Session



# OKLAHOMA

## Ethics Commission



Special Commission Meeting  
June 5, 2026      10:00 AM  
OK State Capitol, Rm. G-3

# Possible Action Following Executive Session

**Case No. 2025-20,  
alleging violations of Campaign  
Finance Rule 2.**

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

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

**C-26-14**

**C-26-15**

**C-26-16**

# No Action On:

**C-26-15**

**C-26-16**

# Resolution honoring service of outgoing Commissioner Johnson.



**OKLAHOMA**  
Ethics Commission



The Ethics Commission would like to acknowledge Howard Johnson for his four and half years of service to the Commission. Johnson was appointed by the Oklahoma Supreme Court in December 2021 to complete the remainder of a 5-year term. Johnson has consistently exemplified thoughtfulness and a resolute presence throughout challenging periods of transition for the Ethics Commission, serving as a member and Chair of the Commission during his tenure.

He offered perceptive insights drawn from his robust community, educational, and administrative service which will be deeply missed by fellow Commissioners, Commission staff, and those who depend on the Commission's work. The Commission thanks Howard Johnson for his valuable service to the Oklahoma Ethics Commission and wishes him well in all his future endeavors.



**OKLAHOMA**  
Ethics Commission



Adjournment



**Next Regularly Scheduled  
Commission Meeting  
July 9, 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 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**

