



OKLAHOMA

Ethics Commission



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



OKLAHOMA
Ethics Commission



Call to Order

Open Meeting Act Compliance

Introductions & Announcements

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



OKLAHOMA
Ethics Commission



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



Executive Director's Report

Executive Director's Report



Budget

As of March 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									396,105.72
	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	618,524.28	.00	395,880.72	
				<u>2,029,260.00</u>		<u>225.00</u>	<u>618,524.28</u>	<u>1,014,630.00</u>	<u>395,880.72</u>	
	200 - Revolving Fund									726,826.67
	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	42,282.61	24,419.89	.00	6,019.50	
				<u>528,209.00</u>		<u>163,061.35</u>	<u>30,685.08</u>	<u>107,973.91</u>	<u>226,488.66</u>	
	210 - Political Subdivisions									236,240.44
	21000	10	26	199,943.00	.00	100,000.00	63,759.56	.00	36,183.44	
	21000	88	26	100,057.00	.00	.00	.00	.00	100,057.00	
				<u>300,000.00</u>		<u>100,000.00</u>	<u>63,759.56</u>		<u>136,240.44</u>	
	211 - Revolving Fund – Specifically for IT/Tech Related Expenses									519,194.36
	21100	10	26	1,500.00	.00	.00	.00	.00	1,500.00	
	21100	88	24	164,186.00	.00	3,995.66	.00	76,129.56	84,060.78	
	21100	88	25	231,540.00	.00	2,007.54	7,018.45	60,623.26	161,890.75	
	21100	88	26	397,495.53	.00	216,132.13	99,191.03	.00	82,172.37	
				<u>794,721.53</u>		<u>222,135.33</u>	<u>106,209.48</u>	<u>136,752.82</u>	<u>329,623.90</u>	
	212 - Guardian Replacement Fund									1,199,318.72
	21200	88	25	1,200,000.00	.00	101,542.12	214,494.78	544,390.00	339,573.10	
	21200	88	26	1,015,000.00	.00	298,192.50	241,796.50	.00	475,011.00	
				<u>2,215,000.00</u>		<u>399,734.62</u>	<u>456,291.28</u>	<u>544,390.00</u>	<u>814,584.10</u>	
	Grand Totals			6,705,147.53	.00	885,156.30	1,350,469.68	2,566,703.73	1,902,817.82	3,077,685.91



Budget

As of March 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	556,255	472,390.09	0.00	0.00	472,390.09	361,991.91	83,864.55	56.62	84.92
512 Insur.Prem-Hlth-Life,etc	147,054	98,036	44,748.20	1,139.88	0.00	45,888.08	101,165.92	52,147.92	31.20	46.81
513 FICA-Retirement Contributi	196,200	130,800	111,493.81	0.00	0.00	111,493.81	84,706.19	19,306.03	56.83	85.24
515 Professional Services	65,687	43,791	63,395.66	118,313.90	0.00	181,709.56	-116,022.56	-137,918.52	276.63	414.95
519 Inter/Intra Agy Pmt-Pers S	432	288	388.50	43.50	0.00	432.00	0.00	-144.00	100.00	150.00
521 Travel - Reimbursements	14,600	9,733	4,436.86	0.00	0.00	4,436.86	10,163.14	5,296.18	30.39	45.59
522 Travel - Agency Direct Pmt	7,400	4,933	781.25	0.00	0.00	781.25	6,618.75	4,151.95	10.56	15.84
531 Misc. Administrative Expen	16,415	10,943	5,966.31	9,568.39	0.00	15,534.70	880.30	-4,591.66	94.64	141.96
532 Rent Expense	700	467	879.52	0.00	0.00	879.52	-179.52	-412.96	125.65	188.51
534 Specialized Sup & Mat.Expe	0	0	466.28	0.00	0.00	466.28	-466.28	-466.28	-	-
536 General Operating Expenses	5,900	3,933	1,703.22	0.00	0.00	1,703.22	4,196.78	2,229.98	28.87	43.30
552 Scholar.,Tuition,Incentive	25	17	54.03	0.00	0.00	54.03	-29.03	-37.39	216.12	324.70
601 AFP Encumbrances	0	0	0.00	13,441.94	0.00	13,441.94	-13,441.94	-13,441.94	-	-
810 Req Only	0	0	0.00	162,299.80	0.00	162,299.80	-162,299.80	-162,299.80	-	-
	1,288,795	859,195	706,703.73	304,807.41	0.00	1,011,511.14	277,283.86	-152,315.94	78.49	117.73
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	676,420	618,524.28	225.00	0.00	618,749.28	395,880.72	57,670.48	60.98	91.47
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	48,480	24,419.89	204,525.41	0.00	228,945.30	-156,223.30	-180,465.14	314.82	472.25
21000 Political Subdiv Enforcemt	199,943	133,295	63,759.56	100,000.00	0.00	163,759.56	36,183.44	-30,464.28	81.90	122.85
21100 Ethics Comm Online Filing	1,500	1,000	0.00	0.00	0.00	0.00	1,500.00	1,000.00	0.00	0.00
	1,288,795	859,195	706,703.73	304,807.41	0.00	1,011,511.14	277,283.86	-152,315.94	78.49	117.73
Totals for Division 10	1,288,795	859,195	706,703.73	304,807.41	0.00	1,011,511.14	277,283.86	-152,315.94	78.49	117.73



Budget

As of March 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	47,375	49,708.24	0.00	0.00	49,708.24	21,353.76	-2,333.60	69.95	104.93
512 Insur.Prem-Hlth-Life,etc	14,820	9,880	9,137.49	0.00	0.00	9,137.49	5,682.51	742.51	61.66	92.48
513 FICA-Retirement Contributi	17,524	11,683	11,871.21	0.00	0.00	11,871.21	5,652.79	-188.65	67.74	101.61
515 Professional Services	988,513	659,008	226,280.06	316,100.06	0.00	542,380.12	446,132.41	116,628.12	54.87	82.30
531 Misc. Administrative Expen	296,434	197,623	7,942.03	5,377.32	0.00	13,319.35	283,114.65	184,303.21	4.49	6.74
532 Rent Expense	3,500	2,333	2,229.75	864.48	0.00	3,094.23	405.77	-760.95	88.41	132.61
533 Maintenance & Repair Expen	117,100	78,067	33,439.65	10,255.60	0.00	43,695.25	73,404.75	34,371.39	37.31	55.97
535 Production,Safety,Security	0	0	34.29	0.00	0.00	34.29	-34.29	-34.29	-	-
536 General Operating Expenses	0	0	344.81	699.98	0.00	1,044.79	-1,044.79	-1,044.79	-	-
541 Office Furniture & Equipme	3,600	2,400	0.00	180,407.00	0.00	180,407.00	-176,807.00	-178,007.00	5011.31	7516.96
601 AFP Encumbrances	0	0	0.00	620.19	0.00	620.19	-620.19	-620.19	-	-
810 Req Only	0	0	0.00	0.00	12,819.90	12,819.90	-12,819.90	-12,819.90	-	-
	1,512,553	1,008,368	340,987.53	514,324.63	12,819.90	868,132.06	644,420.47	140,235.86	57.40	86.09
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	66,705	0.00	0.00	0.00	0.00	100,057.00	66,704.64	0.00	0.00
21100 Ethics Comm Online Filing	397,496	264,997	99,191.03	216,132.13	0.00	315,323.16	82,172.37	-50,326.44	79.33	118.99
21200 Ethics Com Fil Sys Replcmn	1,015,000	676,667	241,796.50	298,192.50	0.00	539,989.00	475,011.00	136,677.56	53.20	79.80
	1,512,553	1,008,368	340,987.53	514,324.63	12,819.90	868,132.06	644,420.47	140,235.86	57.40	86.09
Totals for Division 88	1,512,553	1,008,368	340,987.53	514,324.63	12,819.90	868,132.06	644,420.47	140,235.86	57.40	86.09
Totals for Bus Unit 29600	2,801,348	1,867,563	1,047,691.26	819,132.04	12,819.90	1,879,643.20	921,704.33	-12,080.08	67.10	100.65

Legislative Update



➤ **SB 2180 (Daniels)** Creates Foreign Agent Political Activity Oversight Act which requires Foreign Country Agent to register with the Secretary of State

➤ **ERA 2025-06 Modification of Ethics Rule 5.3** : Adding provision for Lobbyist disclosure of “Countries of Particular Concern”

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

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

Legislative Update

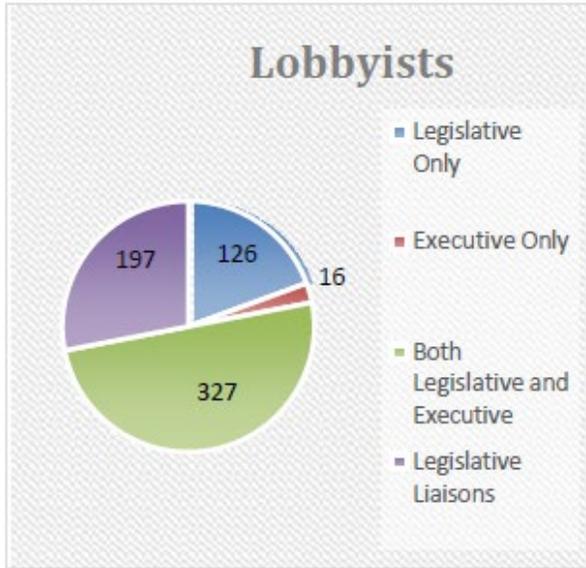


➤ **HB 3306 (Steagall & Sacchieri)**

Lowers the baseline amount of Funds a Candidate Committee may accept or expend from **\$1,000 to \$400** before said Candidate Committee must file a Statement of Organization with the Ethics Commission.

Compliance Update

THE GUARDIAN SYSTEM REGISTRANTS Active Filers as of March 4, 2026



Total Lobbyists: 666



Total Committees: 983

Total Lobbyists and Committees: 1,649

2025 Lobbyist/Liaison January Report (Due 2/5/26)

➤ 96% Filed by Deadline



Upcoming Reporting Schedules

Lobbyist/Liaison

Legislative
Lobbyist/Liaison
2026 February –
March 5,
2026

Legislative
Lobbyist/Liaison
2026 April –
May 5, 2026

Legislative
Lobbyist/Liaison
2026 March -
April 5, 2026

Candidates & Non-Candidate Committees

2026 1st Quarter (2022-
2026 Committees) Due
April 30, 2026
(Candidates and non-
Candidate Committees)

2026 2nd Quarter (2022-
2025 Committees) Due
July 31, 2026
(Candidates and non-
Candidate Committees)

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

Compliance Update

COMPLIANCE ACTIVITY TRACKER				
DATE – FEBRUARY 2026				
COMPLIANCE OFFICERS				
	CO#1	CO#2	CO#3	CO#4
# STATE CANDIDATE OFFICES ASSIGNED*	89	85	93	90
# OTHER COMMITTEE TYPES/LOBBYISTS ASSIGNED	384	666	85	5
# POLITICAL SUBDIVISION OFFICES ASSIGNED*	97	93	99	92
CALLS/WALK-INS	61	83	99	95
REPORTS REVIEWED	59	179	181	215
EMAIL CORRESPONDENCE	412	92	59	88
TOTALS	532	354	339	398

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



OKLAHOMA
Ethics Commission

Compliance Update

▶ Recent Outreach Example

- In February, Compliance Officer and the Director of Compliance delivered an **in-person training** for eight state agency staff with newly assigned lobbying and filing responsibilities.
- The session guided participants through **Guardian registration**, filing duties, and individual compliance questions.

▶ Role of Compliance Officers

- Serve as a **primary resource for candidates, committees, lobbyists, and the public** on reporting requirements.
- Provide assistance through **phone, email, virtual meetings, and training sessions**.

▶ Common Education Topics

- **Guardian system registration** for committees and lobbyists
- **Campaign finance reporting calendars and requirements**
- Proper recording of **contributions, expenditures, in-kind entries, loans, and reimbursements**
- **Committee transitions and terminations**

▶ Recognition

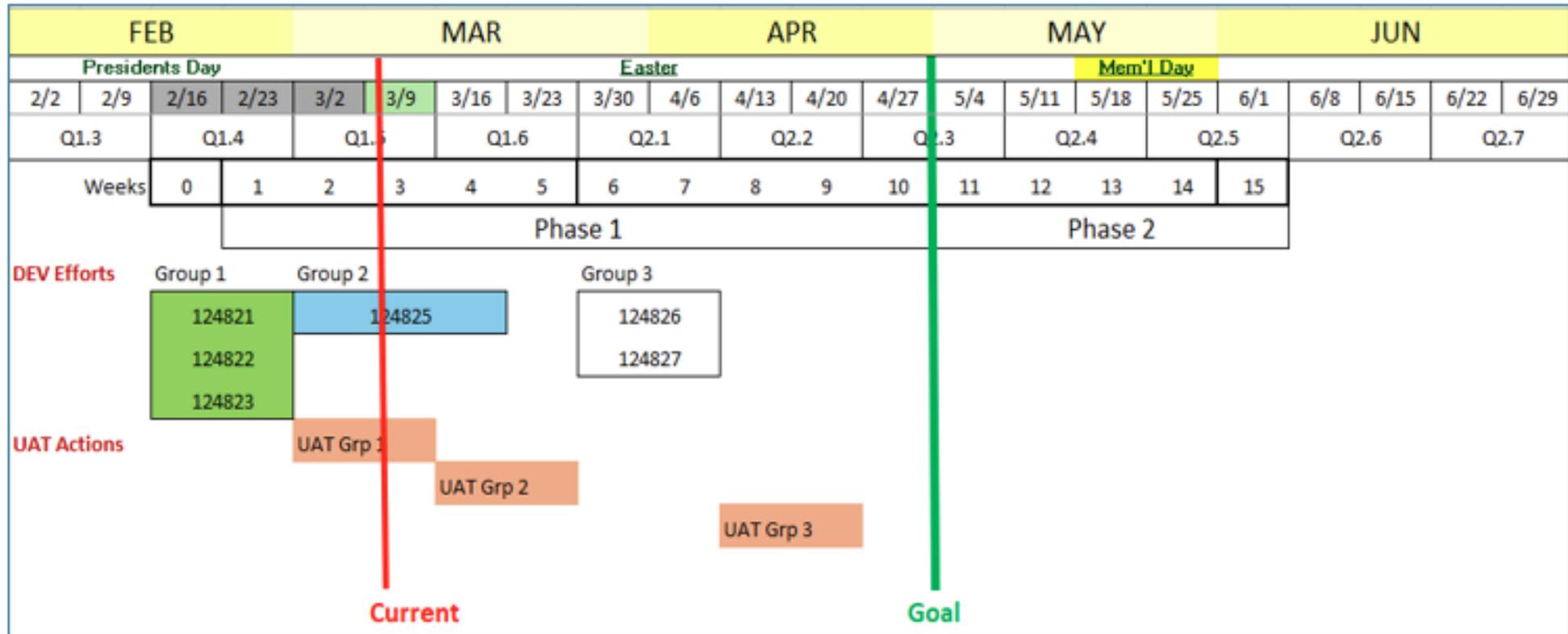
- **Compliance Officer James Mahan** for coordinating and delivering this training and for exemplifying the Commission's commitment to **proactive education and support for regulated filers**.





Political Subdivision Integration

Civix Timeline



The Guardian

Political Subdivisions

➤ Implementation of Interim Solution

localcampaignfilings.ok.gov



The screenshot shows the Oklahoma Ethics Commission website. At the top, there is a navigation bar with the logo, the text "Oklahoma Ethics Commission Local Campaign Finance Transparency Portal", and links for "Home", "Search Filings", and "File a Report". Below the navigation bar is a main content area with a dark blue background. It features the commission's name and a brief description of its role. There are two buttons: "Search Public Filings" and "I'm a Filer". Below this is a section titled "What You Can Do Here" with three cards: "Search Public Filings" (available now), "Campaign Finance Dashboards" (coming soon), and "File a Campaign Report" (available now). At the bottom, there is a yellow banner for "Senate Bill 890 — New Local Candidate Filing Requirement" with a list of applicable offices: County Commissioner, Sheriff, City Council, School Board, and Mayor.

The Guardian | Political Subdivisions

The screenshot shows the Oklahoma Ethics Commission website. The browser address bar displays 'localcampaignfilings.ok.gov/search'. The page header includes the Oklahoma Ethics Commission logo and the text 'Oklahoma Ethics Commission Local Campaign Finance Transparency Portal'. Navigation links for 'Home', 'Search Filings', and 'File a Report' are present. The main content area is titled 'Search Registrations and Forms' and includes a sub-header: 'Search registrations and forms submitted to the Oklahoma Ethics Commission within this system. All data shown has been screened for public access.' Three data cards are displayed: '18 Public Filings' (with a document icon), '\$66,356.18 Total Contributions' (with a dollar sign icon), and '\$7,043.89 Total Expenditures' (with a red arrow icon). A search bar at the bottom prompts the user to 'Search by filer name, committee, office, or county...'.

What we are hearing:



- **“I want to say thank you for creating the temporary website for local campaign reports while the primary system is being completed. I found the process straightforward and appreciated the built-in error checks. It made submitting the reports very easy.”**



LOFT Follow-Up Report

- **Overall Status**
- **All LOFT recommendations have been completed.**
- **Improvements focused on oversight, transparency, operational efficiency, and proactive compliance.**



LOFT Follow-Up Report

➤ Operational Improvements

➤ Case Management System Implemented

- Clio system launched December 2025 with 100% of new cases logged beginning January 1, 2026
- **Centralizes document management, calendaring, task assignments, and audit logs**
- **Impact:** Improved case tracking, reduced administrative duplication, and strengthened documentation consistency.



LOFT Follow-Up Report

➤ Campaign Finance Oversight

- Standardized Filing Review Process
- Formal review schedule adopted March 2025
- All campaign finance filings reviewed upon receipt

➤ Risk-Based Assessment Program

- First comprehensive analysis cycle launched February 2026
- Written standards developed covering contributions, loans, expenditures, surplus funds, and dissolution procedures
- **Impact:** Established a replicable assessment methodology and improved early identification of reporting discrepancies.





Follow-Up Report

➤ Financial Transparency

- The Commission continues to exercise its statutory authority to obtain campaign bank records during reviews and investigations.
- **Impact:** Strengthens reconciliation between reported activity and financial records.

➤ Public Transparency & Reporting

- FY25 Annual Report published December 2025, providing public metrics on enforcement activity, operational improvements, and fiscal stewardship.

➤ Education & Compliance Outreach

- Expanded public resources including:
 - FAQs & staff guidance
 - Recorded trainings & presentations
 - Advisory opinions
- 1,000+ public officials and stakeholders trained statewide, including municipal officials, procurement officers, higher education administrators, attorneys, and regulatory staff.
- **Impact:** Expanded proactive compliance engagement and contributed to a 50% reduction in complaints.



LOFT Follow-Up Report

➤ Procedural Transparency

- Notice of Investigation policy adopted April 2025, requiring notice to accompany subpoenas.
- Uniform criteria established for when complaints or investigations may be made public prior to final resolution.

➤ Enforcement Consistency

- After reviewing other states' practices, the Commission determined investigations will continue during legislative session to ensure uninterrupted oversight and accountability.



OKLAHOMA

Ethics Commission



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



Executive Session



OKLAHOMA

Ethics Commission



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Returning Soon From
Executive Session



OKLAHOMA

Ethics Commission



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Possible Action Following Executive Session

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

**Case No. 2024-29,
alleging violations of Campaign
Finance Rule 2.**

Case No. 2026-03, alleging violations of Conflicts of Interest Rule 4.



C-26-04

No Action On:

C-26-04



OKLAHOMA
Ethics Commission



New Business



Adjournment



**Next Regularly Scheduled
Commission Meeting
April 9, 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



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Ethics Commission