



# OKLAHOMA ETHICS COMMISSION

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

## NOTICE OF REGULAR MEETING

The Ethics Commission of the State of Oklahoma will hold a regular meeting February 9, 2024, at 10:00 o'clock a.m. The Commission will meet at the Oklahoma State Capitol, 2300 N. Lincoln Blvd., Room G-3, Oklahoma City, Oklahoma 73105.

### AGENDA

1. Call to order and determination of quorum present. Chair Brejcha
2. Open Meeting Act Compliance. Chair Brejcha
3. Introductions and Announcements. Chair Brejcha
4. Announcements, consideration, discussion, and possible action on the disqualification or recusal of a Commissioner or Commissioners pursuant to Ethics Rule 1.6 for any item listed herein, other than those items listed for Executive Session. Deputy Director and General Counsel McCord
5. Consideration, discussion, and possible action on minutes for the regular meeting and executive session held January 12, 2024. Chair Brejcha
6. Introduction and explanation of rulemaking request R-24-01 submitted by Representative Cody Maynard regarding requirements for original source disclosures, campaign communication spending notification to donors, and disclosure of top donors on certain campaign communication disclaimers. Deputy Director and General Counsel McCord, Representative Cody Maynard, and/or Representative Maynard's designee.
  - a. Discussion and comments by Commissioners and staff on rulemaking request R-24-01 and/or the Commission's rulemaking process.
7. Consideration, discussion, and possible action on a Commissioner sponsor for rulemaking request R-24-01. Chair Brejcha
8. Executive Director's Report. Director Bruce Boone
  - a. Commission Financials: December 2023 and January 2024
  - b. FY '25 Budget Request Update
  - c. The Guardian System Update

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- d. Ethics Commission’s presentation to the Governor’s Task Force on Campaign Finance and Election Threats
  - e. Legislative Office of Fiscal Transparency (LOFT) study on the Ethics Commission
  - f. Compliance Update
  - g. Legislative Update
9. Consideration, discussion, and possible action to enter closed, executive session, as authorized by the Oklahoma Open Meeting Act in Title 25 of the Oklahoma Statutes, § 307 (B)(1), (4), and (7), and required by Ethics Rules 6.5 and 6.9, to discuss matters identified in **agenda item 10**. Chair Brejcha
- a. **Statement by Attorney**: The information to be discussed in agenda item 10 requires confidential communications between the Ethics Commission and its attorney(s) concerning pending investigations, claims, or actions, the disclosure of which would seriously impair the ability of the Ethics Commission to process the claim or conduct a pending investigation, litigation, or proceeding in the public interest or violate confidentiality requirements of state law.
  - b. Determination, pursuant to Counsel’s advice as set forth above, to enter closed, executive session in the Ethics Commission’s office in Room G-27 of the Oklahoma State Capitol.

10. Executive Session. Chair Brejcha

The designation of “Complaints” or “Cases” are used to identify whether the Commission has opened a formal investigation pursuant to Rule 6.7. A “Complaint” filed with the Commission is assigned a number at the time of acceptance; it maintains the same number until the matter is resolved as provided in Rule 6.

a. COMPLAINTS

- 1. C-22-11
- 2. C-23-28

b. CASES AND INVESTIGATIONS

- 1. Case No. 2019-06, alleging violations of Campaign Finance Ethics Rule 2; *State of Oklahoma ex rel. Oklahoma Ethics Commission v. Coleman*, Oklahoma County District Court, Case No. CJ-2021-4865
- 2. Case No. 2020-01, alleging violations of Campaign Finance Ethics Rule 2
- 3. Case No. 2022-36, alleging violations of Campaign Finance Ethics Rule 2
- 4. Case No. 2023-18, alleging violations of Campaign Finance Ethics Rule 2

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- 5. Case No. 2023-19, alleging violations of Campaign Finance Ethics Rule 2
  - 6. Case No. 2023-20, alleging violations of Campaign Finance Ethics Rule 2
  - 7. Case No. 2023-21, alleging violations of Campaign Finance Ethics Rule 2
  - 8. Case No. 2023-22, alleging violations of Conflicts of Interest Ethics Rule 4
- c. The employment, hiring, appointment, promotion, demotion, disciplining or resignation of Deputy Director and General Counsel.
11. Action to return to open session. Chair Brejcha
12. Announcements, consideration, discussion, and possible action on the disqualification or recusal of a Commissioner or Commissioners pursuant to Ethics Rule 1.6 for any item listed in this agenda for Executive Session. Deputy Director and General Counsel McCord
13. Consideration, discussion, and possible action on the following items considered in executive session. Chair Brejcha
- a. COMPLAINTS
    - 1. C-22-11
    - 2. C-23-28
  - b. CASES AND INVESTIGATIONS
    - 1. Case No. 2019-06, alleging violations of Campaign Finance Ethics Rule 2; *State of Oklahoma ex rel. Oklahoma Ethics Commission v. Coleman*, Oklahoma County District Court, Case No. CJ-2021-4865
    - 2. Case No. 2020-01, alleging violations of Campaign Finance Ethics Rule 2
    - 3. Case No. 2022-36, alleging violations of Campaign Finance Ethics Rule 2
    - 4. Case No. 2023-18, alleging violations of Campaign Finance Ethics Rule 2
    - 5. Case No. 2023-19, alleging violations of Campaign Finance Ethics Rule 2
    - 6. Case No. 2023-20, alleging violations of Campaign Finance Ethics Rule 2
    - 7. Case No. 2023-21, alleging violations of Campaign Finance Ethics Rule 2
    - 8. Case No. 2023-22, alleging violations of Conflicts of Interest Ethics Rule 4
  - c. The employment, hiring, appointment, promotion, demotion, disciplining or resignation of Deputy Director and General Counsel.
14. New Business. This business, in accordance with Oklahoma Statutes, Title 25, § 311(A)(10) is limited to any matter not known about or which could have not been reasonably foreseen prior to the time of posting of this agenda. Chair Brejcha

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15. Adjournment. Chair Brejcha

-NEXT REGULAR MEETING-  
March 8, 2024 at 10:00 a.m.  
Oklahoma State Capitol, Rm. G-3  
Oklahoma City, Oklahoma 73105

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**From:** [Cody Maynard](#)  
**To:** [Stephanie McCord](#)  
**Subject:** [EXTERNAL] Delay in Rulemaking request  
**Date:** Tuesday, February 6, 2024 9:58:30 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Hello Stephanie,

After receiving valuable feedback from a variety of stakeholders regarding my proposed rulemaking request for the Voters Right to Know act with the Ethics Commission, I have decided to postpone the submission for the time being. The essence of any law or rule is to target those who abuse the system while safeguarding the rights of law-abiding citizens. In Oklahoma, the proliferation of unaccountable anonymous bad actors has become a pressing concern, prompting my initial proposal. However, recognizing the complexity of the issue and the importance of thorough consideration, I believe it prudent to review the insights and suggestions I have received. This brief delay will afford me the opportunity to enhance my proposal and to ensure that those seeking to influence our elections are accountable to the people of Oklahoma.

Sincerely,

Cody Maynard  
Representative, House District 21  
2300 N. Lincoln Blvd Rm 341  
Oklahoma City, OK 73105  
(405) 557-7366  
[cody.maynard@okhouse.gov](mailto:cody.maynard@okhouse.gov)

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February 7, 2024

Oklahoma Ethics Commission  
2300 N. Lincoln Blvd., G-27  
Oklahoma City, OK 73105

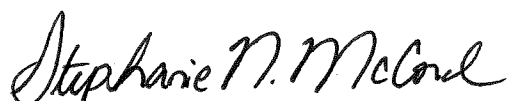
Dear Commissioners and Staff:

It is with much difficulty that I submit to you my formal resignation as Deputy Director and General Counsel at the Oklahoma Ethics Commission, effective March 8, 2024. After almost a decade of dedicated service to the State of Oklahoma, I have decided to step away from state government and accept an opportunity to serve in a new role.

While I am eager to embark on this new chapter of my career, leaving the Commission is bittersweet. I have profound affection for this great state. And, my service to it and its citizens has been a deeply rewarding experience. Serving alongside the Commissioners and Staff, past and present, has been an honor. Their dedication to public service is truly exemplary, as they have tirelessly worked to uphold the Commission's purpose with unwavering commitment and genuinely care for the people of this state. I will miss this meaningful work and the friendships I have made. I hope to continue those friendships even beyond the walls of the Capitol.

I am grateful to have been a part of this Commission. I look forward to witnessing it continue to succeed, especially under the exceptional leadership of Director Bruce Boone. Thank you for the invaluable experience and the privilege to serve with you. I wish the Commission, its members, and staff all the best.

Sincerely,



Stephanie N. McCord  
Deputy Director and General Counsel  
Oklahoma Ethics Commission