



OKLAHOMA ETHICS COMMISSION

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

2024 ELECTIONS STATE CANDIDATE CAMPAIGNS & FINANCES

Thank you for your interest in serving the great State of Oklahoma! The Ethics Commission was created in part to regulate the conduct of campaigns including campaign finances.

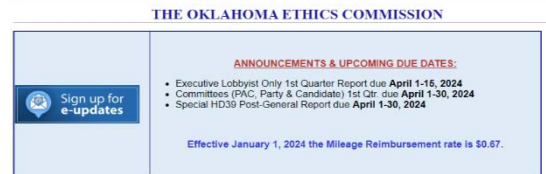
1. **State Candidates Page:** Includes education resources such as: Reporting Calendars, a Guide for Candidates, Ethic Laws, a Contribution Chart, Checklists, and much more. www.ethics.ok.gov



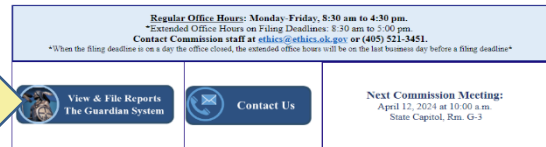
2. **Registration and Reporting with the Commission in The Guardian System.**

Register within 10 days of either:

- o **receiving over \$1,000** of funds, loans, goods, or services for the campaign including transfers from prior committees; **or**
- o **spending over \$1,000** for the campaign, including funds spent by the Candidate and fees paid to the Election Board



Registration Fee: The \$125 registration fee may be paid to 2300 N. Lincoln Boulevard, G-27, Oklahoma City, OK 73105 or online where a \$2.50 fee applies.



REPORTING CALENDAR

The 2024 Election Reporting Calendar is on the [State Candidates](#) page. Committees **must** file periodic reports until the “**Final**” report is filed and the committee is dissolved.

- **Next Report Due by April 30, 2024.** This 1st Quarter Contributions and Expenditure Report includes all committee activity through March 31, 2024, not reported previously.

COMPLIANCE OFFICERS

Compliance Officers assist Committees with registration and reporting in **The Guardian System**, the Commission’s online public disclosure system. They also review filed reports to assist Committees in complying with reporting requirements.

QUESTIONS ON HOW THE LAWS APPLY?

Questions not answered in the Candidate Guide and other online resources may be emailed to ethics@ethics.ok.gov. Emailed questions on how the laws apply to specific or hypothetical situations are answered by the Director or General Counsel. Please allow additional time for a response due to staff vacancies. **Questions requiring a significant amount of analysis or needing binding guidance must be submitted through a request for an Advisory Opinion from the Commission.**

OKLAHOMA ETHICS COMMISSION

2024 STATE CANDIDATE INFORMATION

One Election, Two Agencies. In addition to **State Election Board** requirements, state candidates must follow the rules and filing requirements of the **Oklahoma Ethics Commission**.

The **Ethics Commission** governs contributions and expenditures for state-level campaigns, including personal funds of the candidate used for the campaign.

Fees, Fines, Legal Action. Failure to register, file required reports, or follow the Ethics Rules may result in enforcement procedures, including assessment of fees or fines, investigations, and legal action.

ETHICS COMMISSION RESOURCES

[Website](#) | [Guides](#) | [Ethics Staff](#)

[Ethics Commission Website](#). The Ethics website www.ethics.ok.gov is a candidate's one-stop-shop for campaigns. The Ethics website includes links to **The Guardian System** (the Commission's electronic filing system), important checklists, the Ethics Rules, and other resources for state campaigns.

[Guide for Candidates \(State Office\)](#). This guide provides a summary of the Ethics Rules and examples of common situations as applied to candidates for state office.

[Reporting Calendars](#). Find printable calendars with important state candidate committee reporting dates on the Ethics website at www.ethics.ok.gov.

[Ethics Staff](#). Contact the Ethics staff for questions about the Ethics Rules, filing requirements, and how to use The Guardian System.

Stay Informed!

Sign up to receive email or text notifications for Candidate Committees & follow the Commission on Social Media for important information.



Text **OKETHICS2024** to **GOV311** or **468311** to receive text notifications



Text **OKETHICS2024** [insert email address] to **GOV311** or **468311** or



Follow the Ethics Commission on Twitter @EthicsOKgov



Like the Ethics Commission on Facebook at www.facebook.com/EthicsOKgov

Top Ethics Tips:

1. Read the Guide for Candidates (State Office)
2. Open a campaign bank account **prior** to raising or spending funds
3. Identify committee officers & financial procedures prior to raising and/or spending funds
4. Determine when registration will be required for the committee (see the 2024 Registration Checklist provided in this packet).
5. Maintain records for at least four years, regardless of whether you are required to register with the Commission.
6. Contributions include funds, goods, services, & loans
7. Know & calendar the committee's mandatory dissolution date listed at the bottom of reporting calendar
8. If elected, candidates must file an initial Personal Financial Disclosure Statement (PFD) within 30 days of taking office.
9. **Filings are required until a final report is filed, and the committee is dissolved even if the candidate is not elected.**



www.ethics.ok.gov



(405) 521-3451



ethics@ethics.ok.gov



Oklahoma State Capitol
2300 N. Lincoln Blvd., **Rm. G-27**
OKC, OK 73105




OKLAHOMA ETHICS COMMISSION

2024 REGISTRATION CHECKLIST FOR STATE CANDIDATE COMMITTEES

Read through the checklist before completing any items and use it with the Candidate Guide and Ethics Rules.

ITEM	DESCRIPTION
<input type="checkbox"/>	<p>Read the Candidate Materials</p> <p>Review the following resources from the State Candidate Page at www.ethics.ok.gov.</p> <ol style="list-style-type: none">1. Candidate Guide2. Reporting Calendar3. Contributions Chart4. Ethics Laws
<input type="checkbox"/>	<p>Prior Committee Information</p> <p>Does the candidate have an active state-level campaign committee for a prior election? YES: The “Transition Checklist” is available at www.ethics.ok.gov. It has important information regarding the transition from one committee to another committee. NO: Continue to the next step.</p>
<input type="checkbox"/>	<p>Name the Candidate Committee</p> <p>Candidate committee names must include the following:</p> <ul style="list-style-type: none">• Name of the candidate (full name, first name, middle name, <u>or</u> last name of the candidate); and• Year of the General election <p>Examples: “John Doe 2024”, “Doe for Senate 2024”, “Friends of Doe 2024”</p>
<input type="checkbox"/>	<p>Identify Officers for the Committee (Treasurers & Deputy Treasurers shall be Oklahoma residents)</p> <p>Committees are required to have at least a Chair and a Treasurer.</p> <ul style="list-style-type: none">• The same individual, including the Candidate, may be Chair, Treasurer, or both.• Maintain up-to-date and separate contact information for <u>each</u> officer. <p>Candidates must not serve as officers of any committee other than their own.</p>
<input type="checkbox"/>	<p>Open a Candidate Committee Depository</p> <ul style="list-style-type: none">• Bank• Credit Union,• Other Depository <p>Employer ID Number (EIN) <u>may</u> be required by the bank. See www.irs.gov for details.</p> <ul style="list-style-type: none">• Depository account name must have full name of committee, which includes the year of the General election and name of the candidate.• Depository must ordinarily do business in Oklahoma. See www.banking.ok.gov.• Print or save all bank records (OEC may request documents at any time). <p>All campaign funds are required to be deposited into the campaign depository. All monetary expenditures must be made with check or debit card. Never withdraw cash.</p>
<input type="checkbox"/>	<p>When to Register a Candidate Committee</p> <ul style="list-style-type: none">• Has the candidate or committee accepted in excess of \$1,000 for the campaign?• Has the candidate or committee spent in excess of \$1,000 on the campaign? <p>The value of goods, services, filing fees, and the candidate’s personal funds used for the campaign count toward the \$1,000.</p> <p>YES: “Yes” to either of these questions <u>requires</u> the filing of a Statement of Organization (“SO”) with the Ethics Commission using The Guardian System, within 10 calendar days. A registration fee is required.</p> <p>NO: “No” to both questions means the committee may, but is not required, to file an SO and pay the registration fee. When over \$1,000 has been spent or accepted for the campaign an SO is required within 10 calendar days. A registration fee is required.</p> <p>A candidate is not required to register or report if \$1,000 is not exceeded.</p>

<input type="checkbox"/>	File a Statement of Organization (SO) Using The Guardian System	<div style="background-color: #e0e0e0; padding: 5px; border: 1px solid #ccc;"> <p>Go to www.ethics.ok.gov and click on The Guardian System button at the bottom of the home page.</p>  </div> <ul style="list-style-type: none"> • On The Guardian System site, click the “Registration” tab. • Select the “Candidate Committee” option. • Fill-in required fields (indicated by *red asterisk). • Click “Add to List” when entering the bank depositories and committee officers. • Review and edit registration for accuracy—ensure the <u>street</u> address and email addresses are accurate. • Click the acknowledgement box at bottom of the page, electronically sign the SO, and click “submit” to complete the filing. • The SO will be reviewed by the OEC staff within 3 business days. • Guardian System login credentials will be sent when the registration is approved or conditionally approved to the email addresses provided. • Each user will have their own credentials. Sharing of credentials is not permitted. Individuals can easily be added to access the account by a registered user by amending the SO. Contact OEC staff for assistance in amending your SO if needed. • Do not share usernames and passwords.
<input type="checkbox"/>	Pay \$125 fee for Registration/ Administration	<p>Registration/Administration fees may be paid in The Guardian System with a credit card (\$2.50 service charge applies), cash, or check to the Oklahoma Ethics Commission, 2300 N. Lincoln Blvd., G-27, Oklahoma City, OK 73105.</p>
<input type="checkbox"/>	File Reports as Required by the Ethics Rules	<p>File reports of Contributions and Expenditures and, if applicable, 24-hour Continuing Report of Contributions, until (1) a final report is filed; and (2) the committee is properly dissolved in accordance with the Ethics Rules. Use the “Dissolution Checklist” for how to dissolve the committee.</p> <ul style="list-style-type: none"> • Reporting schedules are available at www.ethics.ok.gov • Maintain ALL records for at least 4 years. • Filing late may result in assessment of a late filing fee up to a maximum \$1,000. • The Commission may pursue action in District Court for violations of Ethics Rules.
<input type="checkbox"/>	Attend a Candidate Training Program	<ul style="list-style-type: none"> • A one-hour candidate training program will be available daily at the Capitol during Candidate Filing, April 3-5, 2024. • One-on-one appointments are available in-person or online with a Compliance Officer, about registration and reporting in The Guardian System.

Need Assistance?

- **The Guardian System Training.** One-on-one training is available by contacting the OEC staff. One-on-one training is unavailable during the last 5 days of a filing period.
- **Ethics Commission Staff.** Call the Ethics Commission staff at (405) 521-3451 or email ethics@ethics.ok.gov if you have questions or would like to schedule a private appointment.



Oklahoma Ethics Commission

2024 Elections: State Candidate Committee Reporting Calendar

- A Statement of Organization (“SO”) is required to be filed with the Ethics Commission within 10 days of spending or receiving in excess of \$1,000. The first report of contributions and expenditures is due during the “Reports Due Between” dates that cover the date when the SO was filed or should have been filed, whichever is earliest. If an SO is filed late or not approved before the end of the “period covered,” the committee must contact the Commission at 405-521-3451 or ethics@ethics.ok.gov to have missing reports added to the account.
- Mandatory dissolution dates are found at the bottom of this schedule.

DIRECTIONS: Committees that file or are required to file an SO must follow the quarterly reporting schedule until 2 weeks before the primary election at which time “Election Cycle Reporting” begins. After the election cycle reporting ends, committees follow the quarterly reporting schedule unless a report is filed with the “**final report**” checkbox marked and the committee has dissolved.

QUARTERLY REPORTING SCHEDULE

REPORTS DUE BETWEEN	PERIOD COVERED	TYPE OF REPORT DUE
April 1 – April 30, 20XX	January 1 – March 31, 20XX	1st Quarter Contributions and Expenditures Report
July 1 – July 31, 20XX	April 1 – June 30, 20XX	2nd Quarter Contributions and Expenditures Report
October 1 – October 31, 20XX	July 1 – September 30, 20XX	3rd Quarter Contributions and Expenditures Report
January 1 – January 31, 20XX	October 1 – December 31, 20XX	4th Quarter Contributions and Expenditures Report

2024 ELECTION CYCLE REPORTING

REPORTS DUE BETWEEN	PERIOD COVERED	TYPE OF REPORT DUE
April 1 – April 30, 2024	January 1 – March 31, 2024	1st Quarter Contributions and Expenditures Report

PRE-PRIMARY ELECTION REPORTING

June 4 – June 10, 2024	April 1 – June 3, 2024	Pre-Primary Contributions and Expenditures Report Required of all 2024 candidates
Within 24 hours of accepting over \$1,000 in the aggregate from a contributor (includes loans)	June 4 – June 16, 2024	Continuing Report of Contributions (CRC) Required only by candidates in the primary election

JUNE 18, 2024 - PRIMARY ELECTION

PRE-RUNOFF PRIMARY ELECTION REPORTING

August 13 – August 19, 2024	June 4 – August 12, 2024	Pre-Runoff Primary Contributions and Expenditures Report Required of all 2024 candidates
Within 24 hours of accepting over \$1,000 in the aggregate from a contributor (includes loans)	August 13 – August 25, 2024	Continuing Report of Contributions (CRC) Required only by candidates in the runoff primary election

AUGUST 27, 2024 - RUNOFF PRIMARY ELECTION

PRE-GENERAL ELECTION REPORTING

October 22 – October 28, 2024	August 13 – October 21, 2024	Pre-General Contributions and Expenditures Report Required of all 2024 candidates
Within 24 hours of accepting over \$1,000 in the aggregate from a contributor (includes loans)	October 22 – November 3, 2024	Continuing Report of Contributions (CRC) Required only by candidates in the general election

NOVEMBER 5, 2024 - GENERAL ELECTION

January 1 – January 31, 2025	October 22 – December 31, 2024	Post-General Contributions and Expenditures Report
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REPORTING AFTER THE ELECTION CYCLE

File quarterly reports after the election cycle according to the Quarterly Reporting Schedule above. Reports are required until (1) a report is filed with the final report checkbox marked **and** (2) the committee is dissolved according to the Ethics Rules.

MANDATORY DISSOLUTION DATE

Any funds remaining in the Committee 90 days after the required dissolution date are forfeited to the General Revenue Fund of the State of Oklahoma.

Does not take office	2-year term	4-year term	6-year term
November 5, 2026	November 5, 2026	November 5, 2028	November 5, 2030

2024 State Elections: Contribution Chart

CONTRIBUTORS	RECEIVING COMMITTEES				
	State Candidate Committee	Limited Committee	1/25 Committee	Party Committee	Unlimited Committee
Individuals** (candidates may give unlimited contributions to their own campaign)	Per Election Limit*: \$3,300	\$5,000 per year	\$5,000 per year	\$10,000 per year (may be split between multiple party committees)	No Limits
	Unopposed Candidates: \$3,300 per campaign				
Limited Committee (other than 1/25 committees)	Per Election Limit*: \$5,000	\$5,000 per year***	Nothing	\$10,000 per year (may be split between multiple party committees)	Nothing
	Unopposed Candidates: \$5,000 per campaign				
1/25 Limited Committee	Per Election Limit*: \$2,500	Nothing	Nothing	\$5,000 per year (may be split between multiple party committees)	Nothing
	Unopposed Candidates: \$2,500 per campaign				
State Candidate Committee	\$3,300 per campaign (from 2024 committee to 2024 committee)	Nothing	Nothing	Up to \$25,000, only after the race is decided for that candidate	Nothing
Political Party	Statewide Office: \$25,000 prior to general election	Nothing	Nothing	Unlimited transfers between committees in same party	Nothing
	All Other State Offices: \$10,000 prior to general election				
Unlimited Committee	Nothing	Nothing	Nothing	Nothing	Unlimited***
Corporations	Nothing	Nothing	Nothing	Nothing	Unlimited

*PER ELECTION LIMITS

Contribution limits are election specific with limits resetting after each election *only if* the candidate's name will appear on another ballot during the election cycle. A contributor may not provide one contribution to be allocated for multiple elections. After the general election, contributors may make additional contributions so long as the overall total given by the contributor does not exceed the amount of a single election limit for that contributor type.

****CASH & ANONYMOUS CONTRIBUTIONS:** No more than \$50 of a contributor's contribution may be in cash or from an anonymous source. Cash or anonymous contributions received in excess of \$50 must either be returned to the contributor (if known) or given to the State Treasurer's office to the general revenue fund of the state of Oklahoma.

****TRIBES:** Contributions from tribes are acceptable, as long as the tribe is not incorporated; tribes follow the individual contribution limit of \$3,300 per election.

*****COMMITTEE TYPE & PURPOSE:** A PAC may only contribute to another PAC of the same type and with the same purpose.

CANDIDATE COMMITTEES

REQUIRED DISCLOSURE LANGUAGE: SIGNS, ADS, MAILINGS, ETC.

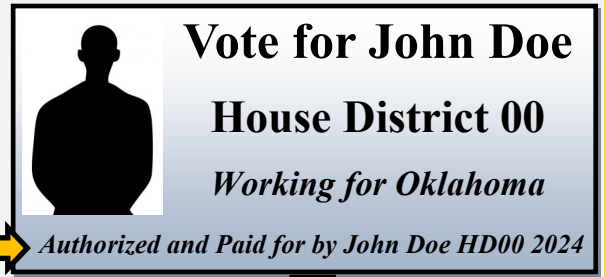
Campaign advertisements and communications—broadcast or printed—may require a disclosure statement. The following chart shows some, but not all, common items involved with candidate committees and whether a disclosure is required.

PRINTED/ELECTRONIC ADVERTISEMENT DISCLOSURE

The *exact* following language must be included in a Candidate Committee advertisement made via electronic or other printed medium either orally or in writing:

“Authorized and Paid for by [Insert Committee Name*]”

***Election year is part of the Committee name.**



Disclosures must be of **sufficient size** and **contrast** to be clearly readable by the intended recipient

This:



Authorized and Paid for by
John Doe for Senate 2024

NOT this:



Authorized and Paid for by John Doe for
Senate 2024



Paid for and Authorized by John
Doe for Senate 2024



Paid for by John Doe for Senate 2024




Reusable Materials: Only printed advertisements that are capable of re-use in another campaign are not required to include the election year in the disclosure.

Advertisements as Contributions









When a contributor is coordinating an ad buy for/with a candidate committee, this is an ad requiring the disclosure language and candidate approval. In these instances the contributor should make a **direct monetary** contribution to the committee.

- The committee must issue a check to the advertiser, and ensure the disclosure is included.
- The candidate committee will report this as a monetary contribution from the contributor and an expenditure by the candidate committee.

REQUIRES THE DISCLOSURE:

	Newspaper, Magazine & Internet Ads	
	Video Ads	
	Mailings	
	Website	
	Banners & Signs (Larger than 18"x24")	
	Handbills/Flyers	
	Door Hangers	

DOES NOT REQUIRE THE DISCLOSURE:

	T-shirts & Hats	
	Yard Signs (18"x24" or smaller)	
	Bumper Stickers	
	Campaign Buttons	

CANDIDATE COMMITTEES: CAMPAIGN EXPENSES

Contributions accepted by a candidate and a candidate committee may be used for the following types of expenditures:

- **Ordinary & necessary campaign expenses:** expenses that would not exist but for the campaign.
- **Officeholder expenses:** (apply only to elected officials) and are limited to the amount transferred forward from the committee for the term of office they are currently serving, not the term they are seeking re-election to. These expenses are expenses required because of the office held and are unique to the office not the officeholder.
- **Surplus funds:** funds remaining in a campaign after the race for the candidate is decided.
- **Contributions to other State level candidates:** Campaign limits apply (dependent on original committee limits).

Contributions shall **not** be spent for “personal use” which is “any use of funds to fulfill a commitment, obligation, or expense of any person that would exist irrespective of a committee’s activities or holder of elective state office.”

EXAMPLES OF PERMISSIBLE ORDINARY AND NECESSARY CAMPAIGN EXPENSES

Political Party Event Entry or Services Only. <u>Example:</u> Party X hosts a dinner event and charges \$100 per ticket although Party X’s cost is \$25/person. The candidate committee may pay \$25 but not \$100. <i>No contribution may be made to a Political Party Committee until the candidate’s race is decided.</i>	Vehicle Travel: include dates, # of miles traveled, purpose and reimbursement rate for 2024 (\$0.67 or less). <u>Example:</u> 1,320 miles @ \$0.67 for Jan. and Feb. for campaign travel. <i>*Note: The reimbursement rate changes in accordance with the State Travel Reimbursement Act rates.</i>
Campaign Consulting Fees: report with description of type of consulting. <u>Example:</u> Strategic, Fundraising or Media consulting.	Online Merchant Processing Fees
Office Supplies and Equipment (Assets must be sold at the close of committee.)	Campaign Office Rent
Advertising	Legal Fees for the campaign
Staff Salaries: Report such expense by staff member’s name	Individual Memberships in Civic or Charitable Organizations: <i>does not include lifetime memberships.</i>
Modestly Valued Campaign Related Goods for Contributors and Volunteers. <u>Examples:</u> shirts, hats, bumper stickers or goods with campaign logo/slogan	Food and Beverages Related to Campaigning: door knocking, watch party, envelope stuffing, etc.
Bookkeeping or Accounting Services	Loan Payments: Only for properly executed loans. For candidates, this requires loan documents signed by lender and committee contemporaneously with the loan, and for the funds to <u>actually be deposited</u> in the campaign depository.
Reimbursement to Candidate for Campaign Purchases made with personal funds <u>within 90 days of the original expenditure</u> (two entry requirement: initial purchase first recorded as an in-kind expense to the vendor.)	

EXAMPLES OF PROHIBITED “PERSONAL USE” EXPENSES

Personal residence mortgage, rent, utilities, food & supplies: even when the house is used for campaign purposes	Gifts: other than modestly valued campaign related goods to contributors or volunteers
Concert, theater, or sports tickets	Vacations or other trips not campaign related
Recreational clubs or memberships/dues: Hunting clubs, country clubs, fitness clubs, golf memberships, etc.	Loan Interest: on loan(s) made by the candidate or the joint funds of the candidate and candidate’s spouse
Personal items: including, but not limited to, apparel (other than modestly valued clothing with campaign logo), footwear, grooming, accessories & dry cleaning	Vehicle maintenance and gasoline: Only permissible if vehicle is wholly owned/leased by the candidate committee, used exclusively for campaign or officeholder purposes, and purchased from a licensed car dealer.

CANDIDATE COMMITTEE CAMPAIGN RECORDS & POLICIES

Committees must report & maintain records for all funds, goods and services given to, leaving, or made on behalf of the committee.

Best Practice: Create Written Committee Policies

The following are some recommended written policies to consider:

- **Notice to Treasurer of Responsibilities under the Ethics Rules & Acceptance by Treasurer**
- **Signatory Authority:**
 - Who can sign checks/debit cards?
 - Are there restrictions on amount?
 - Contact Treasurer for approval?
- **Determine how to maintain information:**
 - Contributor Statements?
 - Contribution log (monetary and in-kind)?
 - Copies of checks and record of cash?
- **Candidate Reimbursement (90 days to reimburse):**
 - Receipts provided to Treasurer in time for report filing.
 - Name of ultimate vendor to whom payment was made: including Time/Date/Reason.

Depository Records and Statements:

- Verify depository has location doing business in Oklahoma
- Account Opening Records
- Signatory Cards
- Deposit Records
- Copies of Checks
- All Statements

Before Closing Account:

- Print Off or Save All Bank Records

KEEP RECORDS FOR AT LEAST

4
YEARS

Required Contributor Records for Contributions:

Must use best efforts to obtain contributor information regardless of the amount or value of the contribution.

- **From Individual Contributors and Tribes:**
 - Name and Address
 - Occupation and Employer (N/A for Tribes)
- **Limited Liability Company/Limited Partnership (LLC/LP)**
 - Report through Members & Partners as individuals
 - NEED:** Member/Partner Name, % of ownership, occupation and employer for **each** member / partner to allocate and report contributions on reports.
 - Contributions prohibited if any Members/Partners are incorporated
- **From Committee Contributors—Committee cannot accept Corporate Funds:**
 - Committee #** (OK/Ethics ID, FEC, or number assigned by another state)
 - Committee Address
 - Out of State (Non-FEC) PACs:** required to submit notice of registration to the Ethics Commission before contributing to Oklahoma candidates.
- **In-kind Contributions** - fair market value and description of goods or services

Expenditure Records:

- **Mileage Log:** Date, Amount Miles, Rate, Reason for travel.
- Contracts
- Check Register
- Debit Card Records
- Loan Payments
- Records of Purchased Assets/ Services
- Invoices
- Receipts
- Any other information used to substantiate committee expenditure activity.

Record Keeping for Loans

Written Documentation of Loan

- Made contemporaneously (close in time) to funds deposit date
 - Lender information
 - Recipient Committee information
 - Signed by Lender and Treasurer
 - Terms: interest rate and payments, such as “repay through contributions”, “repay as able,” etc.
- **Deposit in Campaign Depository**
 - Deposit slip or other records of deposit

Limits From Candidate or Joint Funds of Candidate and Spouse: No Limits

2024 Election Limits From Other Individual: \$3,300/election if a candidate’s name is on the ballot. (See contribution chart).

Limit From Banks or Financial Institutions: Not a contribution, so long as it is on the same terms available to the public.



If there is a conflict between information on this form and the Ethics Rules, the Ethics Rules control.

COMPLIANCE & COMPLAINTS

Ethics Commission Rules have the full force and effect of statutes and the Commission is required to enforce its rules. The process is summarized below. For more information, see the *Enforcement and Compliance Guide* at www.ethics.ok.gov.

PAST DUE REPORTS, FORMAL COMPLAINTS & INVESTIGATIONS

Compliance Orders. This process is an enforcement mechanism of the Commission to resolve compliance issues not requiring a formal investigation. The Executive Director oversees this administrative process for matters such as reporting errors, straightforward compliance issues, and late filings. The Director may direct action, including payment of fees *no higher than \$1,000*. Any entity assessed a Compliance Order has the opportunity for a hearing before an administrative law judge to show “good cause” why the Compliance Order should be modified or set aside. The request must be received by the Commission in writing within 30 days of the date the Proposed Compliance Order was issued. Second and subsequent late filings are deemed an intentional violation of the rules.

The Complaints process arises via (1) complaints filed with Commission by a member of the public or (2) internal complaint filed by the Commission staff. This process is typically used for more serious violations of the Rules not appropriate for the administrative process and includes repetitive violations such as repeatedly failing to file reports. The complaint coversheet must be completed and submitted. It is found under the “*Enforcement*” page on the Ethics Commission website.

Investigations and Complaints. A written complaint filed is considered by the Commissioners of the Ethics Commission. At Commission meetings, the Commission will decide whether to open investigations for alleged violations of the Ethics Rules. Once an investigation is opened, the Commission has the power to issue subpoenas to further its investigation. A formal investigation may be resolved through dismissal, a Settlement Agreement, or may be prosecuted as a civil case in District Court. The Commission will not take action, other than dismissal, until the Respondents have been notified of the alleged Rule violations and provided 20 days to respond to the allegations.

COMPLAINTS WILL NOT BE ACCEPTED DURING THE “BLACKOUT PERIOD”

The Commission will not accept complaints that allege a candidate or a candidate committee violated the Ethics Rules during an election cycle. This complaint “**Blackout Period**” begins April 3, 2024 and ends November 5, 2024. The Commission will begin accepting complaints for 2024 candidate committees on November 6, 2024. **This provision is intended to prevent the complaint process from being used for political purposes during a campaign.**

The blackout period does not prevent the Commission from engaging in investigations during the complaints blackout period. [Rule 6.4](#).

If there is a conflict between information on this form and the Ethics Rules, the Ethics Rules control.

CANDIDATE COMMITTEE ONLINE REGISTRATION/REPORTING

The Guardian System

The Guardian System is Oklahoma’s state of the art public transparency website for state level campaigns, lobbyist reporting, and other documents filed with the **Oklahoma Ethics Commission**. Campaign and lobbyist filings are immediately available for public viewing once the documents are filed.



**View & File Reports
The Guardian System**

Look for this button at www.ethics.ok.gov to file or access filings.

Candidate Committees: Review All Registration and Reporting Requirements Prior to Registering.

This document provides an overview for candidate committees on registration, navigation, data entry, and filing an original or amended report in The Guardian System.

Candidate Committees use The Guardian System to:

1. Register Candidate Committees for Elective State Offices
2. Enter Transactions — All contributions, other funds, and expenditures
3. File Reports
4. Pay Fees
5. View All Filed Reports, Perform Searches, and Download Data

Filing reports with the Ethics Commission is a two-step process.

- 1) **Enter all transactions: Monetary, Goods, Services, Payments, or Transactions on Behalf of the Committee:** Users will enter all transactions in the Contributions, Expenditures, and Loan sections under the “Financial” tab. Transactions may be entered 24 hours a day, 7 days a week.
- 2) **File the report:** Once the time to actually file the report begins, the user will use the “Filings” tab. Filings are due no later than 11:59:59 p.m. (Central) on the deadline with staff available until 5:00 p.m. to assist.

Filing Deadlines: Election specific reporting calendars are available at www.ethics.ok.gov on the “State Candidate” page with report due dates and should be calendared by the Committee. Those dates are also in The Guardian System once a committee registers. For reports *other than Continuing Reports of Contributions (24-hour reports)*, **The Guardian System** automatically sends email reminders to committees with a report due that has not yet been filed during the 7 days prior to the deadline. Notices are sent to the email addresses provided by the Committee on the original, or most recently amended, Statement of Organization.

Need assistance?

Call Commission staff at (405) 521-3451 with quick questions or to schedule more in depth one-on-one training. Plan ahead for any in-depth training on The Guardian System as Commission staff is focused on being available to provide assistance to all filers during the last 5 days of a quarterly or pre-election reporting period.



Produced by the Oklahoma Ethics Commission

CC Registration v2022.1

1. Access The Guardian System two ways

- 1) <https://guardian.ok.gov> or
- 2) Through the ethics website: www.ethics.ok.gov

(Click on The Guardian System button on the lower left side of the homepage)



2. Register in The Guardian System

On The Guardian System menu, click the “Registration” tab to begin a Statement of Organization (SO) and select the type of entity as Candidate Committee, click the “Registration” button, fill in the required information (red asterisk indicates required items):

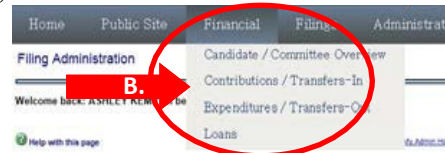
- A. Candidate Information
- B. Committee Information (Candidate Committee name must include candidate name + year of the election)
- C. Depository Information (click “add to list” to save each depository’s information)
- D. Committee Officers’ and Designated Filing Agents’ Information.
 - 1) You must enter each officer’s or agent’s information, including individual email addresses. Do not use a single email address for multiple people (click “add to list” to save officer or agent information).
- E. Review and check the acknowledgement box
- F. Click “Submit”
- G. Pay registration fee
 - 1) May pay online with credit card (there is an additional processing fee) or by cash or check to the Commission office
- H. Commission staff will review each SO and either accept, conditionally accept, or reject the filing.
- I. When the SO is accepted (fully or upon conditions being met such as payment) each user will receive two emails: one with a username and one with a temporary password that expires in **7 days**.
- J. Set up your permanent password by clicking on “Filer Login” and entering your username and temporary password. You will be prompted to set a permanent password. Do not share credentials with another individual but add them to your account.



****Helpful Tip**** Add your Guardian username to your contacts list in your phone.

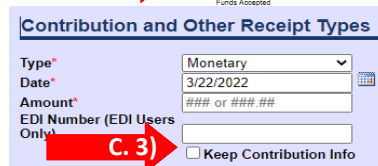
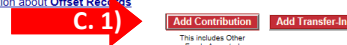
3. Enter Contributions, Other Funds Accepted and Transfers-In:

- A. Log in to your account at guardian.ok.gov. Click on the “Filer Login” tab on the menu and enter your username and password.
- B. Committees report contributions by hovering over the “Financial” tab, and selecting the “Contributions/Transfers-In” option.
- C. For Contributions:
 - 1) Click the “Add Contribution” button to enter a monetary or in-kind contribution; and
 - 2) Fill in the required information for each contribution, including contributor type, name, address, occupation and employer.
 - 3) Use the “Keep Contribution Info” checkbox only when the contribution information is the same for multiple entries.
 - 4) Use the “Keep Contributor Info” checkbox for reporting multiple contributions for the same person, remember to uncheck the box when complete.



Contribution / Transfer-In History
This is a list of the 100 most recent contributions and transfers that have been added or updated. New contributions and transfers may be added by clicking the **ADD** buttons. If you wish to view or update prior contributions and transfers, click the **FIND** button. To update a specific contribution or transfer, use the links in the **ACTION** column. To update a Specific Loan or Loan Forgiveness (Contribution) please go to the Loan Work Page.

[Click here for information about Offset Records](#)



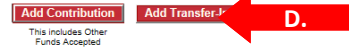
Type*	Monetary
Date*	3/22/2022
Amount*	### or ###.##
EDI Number (EDI Users Only)	
	<input type="checkbox"/> Keep Contribution Info

D. For Transfers-In:

- 1) Click “Add Transfer-In.” This is only for state candidate committees that are transferring funds from a prior committee. Assets (equipment purchased with committee funds) may also be transferred in a separate entry. If the committee is closed and not in the dropdown, call the Ethics Commission.

Contribution / Transfer-In History
 This is a list of the 100 most recent contributions and transfers that have been added or updated. New contributions and transfers may be added by clicking the **ADD** buttons. If you wish to view or update prior contributions and transfers, click the **FIND** button. To update a specific contribution or transfer, use the links in the **ACTION** column. To update a Specific Loan or Loan Forgiveness (Contribution) please go to the Loan Work Page.

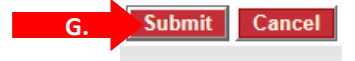
[Click here for information about Offset Records](#)



E. Other Funds Accepted is used for things like interest from a depository or refunds.

F. Each entry will populate in a red/white grid.

G. Click the “Submit” button to save the transaction.

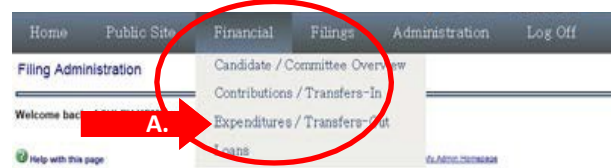


H. For repeat contributors choose “Select Previously Entered Individual” from the dropdown list. This populates the contributor information and aggregates a the running total on the contribution reports.

There are specific short videos about entering contributions, expenditures, loans, and transfers you may access here: <https://guardian.ok.gov/PublicSite/Publications.aspx>

4. Expenditures

A. Committees report expenditures by hovering over the “Financial” tab and selecting the “Expenditures/Transfers-Out” option.



B. For Expenditures:

- 1) Click the “Add Expenditure” button to enter an expense
- 2) Fill in the required information for each expenditure
- 3) The system will retain vendor information once entered. Previously entered “Recipient” information is stored and you may pick the business or individual from the dropdown.

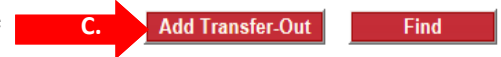
Expenditure / Transfer-Out History
 This is a list of the 100 most recent expenditures and transfers that have been added or updated. New expenditures and transfers may be added by clicking the **Add** button. If you wish to view or update prior expenditures and transfers, click the **Find** button. To update or delete a specific expenditure or transfer, use the links in the **Action** column.

[Click here for information about Offset Records](#)

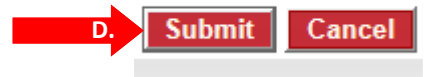


C. For “Transfers-Out.” This is only for state candidate committees transferring funds and/or assets to their new state candidate committee. **New committees** should be registered prior to recording the transfers.

- 1) Click “ Add Transfer-out,” enter date, and the amount to be transferred
- 2) Click committee registered
- 3) Click the “NEW” committee from the drop-down.



D. Click the “Submit” button to save the transaction.



Each entry will populate in a grid below the buttons.

5. Candidate Reimbursement—A candidate who spends personal funds on his/her campaign may be reimbursed from campaign funds, but must report both the personal expenditure and the reimbursement. These reimbursements are itemized regardless of the amount.

- **90 day limit.** The reimbursement to the candidate must be made within 90 days of the candidate’s purchase using personal funds. If the reimbursement does not occur within 90 days, the expenditure becomes a non-refundable contribution to the candidate committee from the candidate.
- **Timely reporting and sufficient documentation is required.** Documentation must be kept by the committee Treasurer of both the good or service purchased by the candidate and the reimbursement to the candidate.

Reporting Candidate Reimbursements

- Report candidate’s reimbursable transaction (i.e., the original expense) using the “Expenditure Type” option of **“in-kind.”** This will show the required details of the purchase just like all other committee purchases, but is reported as “in-kind” because committee funds do not leave the depository.

Recipient	Expenditure or Transfer Type	Expenditure Date	Amount
THE HERITAGE HOUSE	In-Kind ROOM RENTAL	03/22/2022	\$320.00

- Report the reimbursement to the candidate under the “Expenditure Type” option as **“candidate reimbursement,”** and reference the original expenditure.

Recipient	Expenditure or Transfer Type	Expenditure Date	Amount
TEST, JULIE	Candidate Reimbursement REIMBURSED ROOM RENTAL 3/22/2022	03/26/2022	\$320.00

- Report mileage reimbursement with the number of miles, dates, where, and purpose, along with the rate of reimbursement up to amount of the current state rate.

Recipient	Expenditure or Transfer Type	Expenditure Date	Amount
TEST, JULIE	Candidate Reimbursement MILEAGE REIMBURSEMENT FOR 138 @ \$.585 FOR CONSTITUENT MEETINGS IN DISTRICT 3/7/22 TO 3/11/22.	03/18/2022	\$80.73

6. Loans—Required Three-Step Process:

A. Loan document signed by the Treasurer and Lender; (even if same person) contemporaneously with deposit of funds

B. Deposit Funds in Campaign Depository

C. Report the Loan in The Guardian System.

- 1) Hover mouse over the “Financial tab” and select “Loans.”
- 2) Click the red “Add Loan” button.
- 3) Enter the loan terms and click “submit” to add the loan to the transaction grid.
- 4) All loan activity is reported using the “Loans” page, including payments or forgiveness for each loan listed.



Loan History
This is a list of all loans that you have recorded. New loans may be added by clicking the **Add** button.
To work with a specific loan
Use the **Action** links next to each individual loan. Loan payments (expenditures) may be added by clicking the **Payment** link and forgiven loans may be recorded by clicking the **Forgive** link. Similarly, loans may be updated or deleted by clicking the appropriate links. Note that a loan with payments associated to it may not be deleted without first removing all payments.

[Click here for information about Offset Records](#)

There are currently no loans



Loan Entr.

Loan Date* 4/3/2016
Principal Amount* 2000
Interest Rate 0
Interest Rate must be a number between 0 - 100, e.g. 4.75

Loan Terms* To be repaid when funds are available.

EDJ Number (EDJ Users Only)

Loan Source Information

Type* Candidate (Self)

(Optional) Joint accounts only. When a candidate loans funds to the committee from a joint account of the candidate and candidate's loan as using joint funds and include the spouse's name check the box below and enter the spouse's name. Loans from a spouse to

Click here for contributions made from joint funds.

Spouse's name, if joint funds:

3 Submit Cancel

Loan Source	Loan Source Type	Description	Loan Terms	Date of Loan	Original Amount	Current Balance	Offset	Amended	Filed?	Action
TEST, JULIE	Candidate (Self)	TO BE REPAYD AS FUNDS ARE AVAILABLE		03/10/2022	\$2,000.00	\$2,000.00	No	No	No	Update Loan Delete Loan Add Loan Payment Add Loan Forgiveness

7. File a Report

A. Once a filing period opens, all transactions have been entered, and a committee is ready to file a report, click on the “Filings” tab, and select “Financial” from the drop-down menu.

B. On the “Filing Administration” page, click the “View/File” link next to the report due.

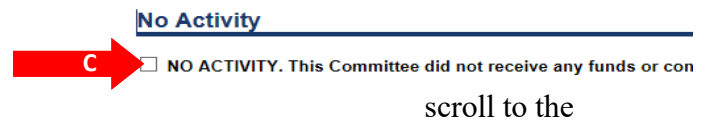
Note: View/File is only visible once a filing period begins and any conditions related to the filing of the Statement of Organization have been resolved.



Report	Period Begin	Period End	File Begin Date	Due Date	Status	Action
2022 1ST QUARTER REPORT	1/1/2022	3/31/2022	4/1/2022	4/30/2022	Not Filed	View/File
2022 PRE-PRIMARY REPORT	4/1/2022	6/13/2022	6/14/2022	6/20/2022	Not Filed	View/File
2022 PRE-RUNOFF REPORT	6/14/2022	8/8/2022	8/9/2022	8/15/2022	Not Filed	View/File
2022 PRE-GENERAL REPORT	8/9/2022	10/24/2022	10/25/2022	10/31/2022	Not Filed	View/File
2022 POST-GENERAL REPORT	10/25/2022	12/31/2022	1/1/2023	1/31/2023	Not Filed	View/File

C. Filing a Report with No Activity.

If the committee had no activity during a reporting period, select the “No Activity” box, skip to #5 below.



D. Filing a Report with Activity in The Guardian System.

1) The “Report Summary” section shows a summary page of the report with all the transactions for the committee, including totals of contributions, transfers, expenditure and loans entered.

2) **First Report only:** you may opt to itemize all expenditures by checking the “Itemize all expenditures” box, otherwise only expenditures over \$200 will be itemized. (NOTE: This cannot be reversed)

3) **First report only:** For a Candidate Committee, the beginning balance will always be “0.” Enter the amount of debt from a prior committee “0.” Click “Refresh Schedule Summary.”

4) **Preview the Report.** Filers/committees may “preview” the report prior to submission to review and ensure the report is ready to be filed. If it is not, the filer can enter, delete, or update transactions until all information is accurate.

5) **File the Report.** Once the information is complete, accurate, and ready to be filed, sign electronically by clicking the box at the end of the page and click “File” to submit the report.

Report Summary

ITEMIZE ALL EXPENDITURES. The Committee elects to itemize expenditures that are \$200 or less even though this is not required. This option will apply to all reports for the filing cycle.

Enter a Beginning Balance*

Enter Debt from Prior Committee, Line 18*

[Refresh Schedule Summary](#)

	Reporting Period Total	Aggregate Total
1. REPORTING PERIOD BEGINNING BALANCE:	\$0.00	
2. Surplus Funds Transferred from Prior Committee [Schedule B]	\$51,242.77	\$51,242.77
3. Monetary Contributions from Individuals [Schedule A]	\$0.00	\$0.00
4. Monetary Contributions from PACs [Schedule A]	\$0.00	\$0.00
5. Monetary Contributions from a Political Party [Schedule A1]	\$0.00	\$0.00

Report Summary

ITEMIZE ALL EXPENDITURES. The Committee elects to itemize expenditures that are \$200 or less even though this is not required. This option will apply to all reports for the filing cycle.

Enter a Beginning Balance*

Enter Debt from Prior Committee, Line 18*

[Refresh Schedule Summary](#)

Submit Report

To submit this report, you must check the acknowledgment box, then click Submit. Once submitted, the report is considered filed and is available for view on The Guardian. Click Cancel to exit the page without filing.

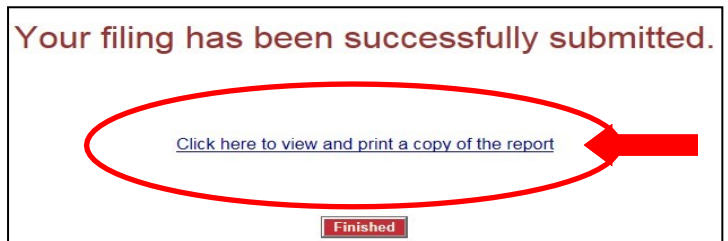
By signing, electronic or otherwise, my name below, I acknowledge that the information submitted is complete, true and accurate as of the date submitted. I understand that failure to provide such information is a violation of the Ethics Rules of Oklahoma. I understand that I can update the information above at any time by filing an amended Contributions and Expenditures Report.*

[Preview](#) [File](#) [Cancel](#)

By signing, electronic or otherwise, my name below, I acknowledge that the information submitted is complete, true and accurate as of the date submitted. I understand that failure to provide such information is a violation of the Ethics Rules of Oklahoma. I understand that I can update the information above at any time by filing an amended Contributions and Expenditures Report.*

[Preview](#) [File](#) [Cancel](#)

E. **Print and/or Save Filed Report.** Once the report is filed, it may be printed or saved by clicking the “click here to view and print a copy of the report” link. Then click “Finished.”



Filed reports will appear in the “Filing History” section under the “Filings” tab. Select the “View” link next to the report to view the filed report, which may be printed or saved for recording purposes. This filing is also available on The Guardian System for the public to review.

Filing History

Report	Period Begin	Period End	Due Date	Filed	Amended	View	Amend
2021 4TH QUARTER REPORT	10/1/2021	12/31/2021	1/31/2022	1/17/2022	No	View	Amend
2021 3RD QUARTER REPORT	7/1/2021	9/30/2021	10/31/2021	10/20/2021	No	View	Amend

E. **Filing an amended report.** First delete, add, or update transactions as needed for the amendment from the “Financial” tab. Then return to the “Filings” page and select the “Amend” option in the “Filing History” section next to the report to amend. At that point, the system checks the reporting period and pulls in all transactions for those dates—including the transactions you just added or corrected. File the amendment by the same process as filing any other report. The grid will then indicate that an amendment has been filed by a “Yes” in the amendment column.

Filing History

Report	Period Begin	Period End	Due Date	Filed	Amended	View	Amend
1ST QUARTER CANDIDATE COMMITTEE SCHEDULE	1/1/2015	3/31/2015	4/30/2015	4/14/2015	Yes	View	Amend
Candidate Committee Registration				3/13/2015	Yes	View	Amend

G. **Correcting Contributor/Recipient Information.** What happens if a contributor or recipient moves, changes their name, or, for an individual contributor, changed employer?

[Click here for information about Offset Records](#)

[Add Contribution](#) [Add Transfer In](#) [Find](#)
This includes Other Funds Accepted

Contributor	Contribution or Transfer Type	Receipt Date	Amount	Offset	Amended	Filed?	Action
MINER, LACY	Monetary	03/18/2022	\$2,000.00	No	No	No	Update Delete Refresh
CHOCTAW NATION	Monetary	03/06/2022	\$1,500.00	No	No	No	Update Delete Refresh
FUTURE LEADERS OF OKLAHOMA PAC	Monetary	03/22/2022	\$2,000.00	No	No	No	Update Delete Refresh
HEART, GARY	Monetary	03/18/2022	\$250.00	No	No	No	Update Delete Refresh
MINER, LACY	Monetary	01/16/2022	\$600.00	No	No	No	Update Delete Refresh
KIND, LAWRENCE	Monetary	01/23/2022	\$2,700.00	No	No	No	Update Delete Refresh

Contributor Maintenance
 By entering the Contributor Maintenance area, you will have the ability to search for a contributor and make any necessary changes to the information that is stored about the selected contributor.

[Update a Contributor](#) **1**

1) To edit previously entered contributor/recipient information, select “Update a Contributor” or “Update Recipient” at the bottom of the relevant Contributions or Expenditure page under the “Financial” tab. Search for the name, make the corrections and click “Update” to correct. This will correct all **future** entries.

Recipient Maintenance
 By entering the Recipient Maintenance area, you will have the ability to search for a recipient and make any necessary changes to the information that is stored about the selected recipient.

[Update a Recipient](#) **3**

2) After updating the Contributor or Recipient, to correct any **previously** filed entry, find the line item in the contribution expenditure grid or use the “Find” button to search by date range, amount, transaction type, or name and click “update” on each entry. When all data entry has been corrected go to the “Filings” tab and amend the corresponding report.

