

# OKLAHOMA ETHICS COMMISSION

August 14, 2025

## SPECIAL MEETING

### 1. Call to Order.

Upon notice, with the agenda being properly posted at the Commission's office at least 24 hours prior to the commencement of the meeting and notice being filed in advance with the Office of the Secretary of State, a special meeting of the Ethics Commission of the State of Oklahoma ["Commission"] was called to order on Thursday, August 14, 2025, at 11:03 am. Chair Justin Meek ["Meek"] opened the meeting in Room G-3 of the State Capitol Building, Oklahoma City, Oklahoma.

#### **Determination of Quorum.**

Roll was called to determine the existence of a quorum. Commissioners present were Howard Johnson ["Johnson"], Mike Wilt ["Wilt"], Vice Chair Adam Weintraub ["Weintraub"], and Chair Justin Meek ["Meek"]. A quorum of members was declared.

#### **Staff & Visitors.**

Commission staff members present were Executive Director Lee Anne Bruce Boone ["Bruce Boone"], General Counsel Margaret Kerr ["Kerr"], Deputy Director Jeremy Rogers ["Rogers"], Legal Assistant La Shounda Faye, Legal Intern Megan Catlin, and Compliance Officer Tyler Fixley.

**Observing all or part of the meeting:** David Oakley, Media; Blake Douglas, Media; Emma Murphy, Media; Jeff Elkins, Media; Paige Taylor, Media; H.J. Reed, OKSPA; Glenn Coffee, Senate; Alex Gladden, Media; Dacoda McDowell-Wahpekeche, Media; Jospeh Pearce, Senate; Ryan Overholt, Senate; and Erik Parker, Media.

### 2. Open Meeting Act Compliance.

Chair Meek reviewed the *Affidavit of Posting* and affirmed compliance with the Oklahoma Open Meeting Act.

### 3. Introductions and Announcements.

Chair Meek announced that today's Commission Meeting is being livestreamed today via Zoom.

### 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 matter listed on the Commission agenda.

No additional recusals.

5. **Consideration, discussion, and possible action on minutes for the regular meeting and executive session held July 10, 2025. [Chair Meek]**

**Motion:** Commissioner Johnson moved to approve the minutes for the regular meeting and executive session held on July 10, 2025.

**Second:** Vice Chair Weintraub

**Roll Call Vote:** Wilt – Abstained, Weintraub – yes, Johnson– yes, Meek – yes

**Motion Carried**

6. **Executive Director's Report**

**a. Open Meetings Update**

Executive Director Bruce Boone reported that the Commission meeting is being livestreamed as was announced in advance through the official meeting notice and Ethics Commission social media sites, and the PowerPoints are now posted on the Commission's website following each meeting to enhance transparency.

**b. Compliance Update**

Executive Director Bruce Boone reported the commission remains on track with approximately 1,500 registered lobbyists and committees, consistent with previous reporting cycles. She highlighted the ongoing outreach efforts of compliance officers and noted the addition of a fourth officer. Compliance officers are moving beyond routine report reviews; they are now able to proactively engage with filers by contacting liaisons and committees with closing accounts and completing necessary filings. She shared positive feedback from recent training sessions conducted by herself and General Counsel Kerr on Conflict of Interest and Political Subdivisions.

**c. Budget Update**

Executive Director Bruce Boone provided an update on revolving Fund 200 that collects Commission revenue; Fund 210, the Political Subdivision Fund, received a \$300,000 appropriation from the Legislature; Fund 211 is a rollover account of excess revenue from Fund 200 to cover IT expenses; and Fund 212 is the Guardian System replacement. Fund 191, allocated last year for Political Subdivisions, had unused funds that have been retained for the upcoming fiscal year, and revolving funds carry forward year to year. Executive Director Bruce Boone reported that the Commission's budget is on stable financial footing.

**d. Guardian System Update**

Executive Director Bruce Boone reported that Guardian 2.0 is on track for a planned go-live September 2, 2025. She expressed optimism, noting substantial progress from last month and improvements in internal administrative features. Testing has been conducted, though external testing was briefly delayed due to a statewide internet outage. If needed, the current Guardian system of Civix will remain in use until October. The planned shutdown for the transition is scheduled for the weekend of August 29, 2025.

**e. Civix Reference Letter**

Executive Director Bruce Boone stated that Civix requested a letter of reference. A draft was presented. The letter is to focus on the partnership with Civix due to their last-minute agreement to extend the current Guardian system for 3 months in light of delayed implementation of Guardian 2.0 with new vendor.

Comment by Chair Meek that he did not see any downside to the proposal.

Comment by Executive Director Bruce Boone that she sees no issues given the language that it captures. Civix requested permission to use a quote from an email and she informed them that prior approval would be required. She also explained that she could not speak to the historical relationship between Civix and the Ethics Commission, as she has only worked with them for a short period of time.

**f. LOFT Update**

Executive Director Bruce Boone reported on continued efforts to implement LOFT recommendations, emphasizing transparency and accountability. Beginning next year, the Commission plans to conduct deeper audits by selecting a 2% sample for review, which will include requests for bank statements. Interviews are underway for an investigator with financial expertise to support compliance and legal. She also noted that additional funding for political subdivisions will ensure adequate staffing by November. With these expanded resources, the Commission will be able to maintain full review of campaign materials and in-depth audits.

**g. Advisory Group**

Executive Director Bruce Boone noted that she has been developing an Advisory Group to serve as a representative voice for the communities the Commission regulates with 8-10 volunteer members, representing the media, the public, former legislators, and political strategists, and will meet quarterly. It can function as a rule-making advisory group, and Commissioners could participate.

Question from Commissioner Johnson, will this group be subject to open meeting laws.

Comment by Executive Director Bruce Boone stated that it is not a formal part of the commission. The meeting can be shared virtually and anyone that wants to attend can attend.

**7. Political Subdivision Enforcement. Consideration, discussion and possible action of Educational Marketing Proposal for Statewide Outreach Effort.**

Executive Director Bruce Boone stated that the 191 funds were miscategorized in last year's appropriations bill, preventing their transfer to a revolving fund. With legislative intent and coordination with OMES, the funds were allowed to carry over into this year. The leadership team has worked on the political subdivision effort, including road tours and marketing, to determine the best approach moving forward. A statewide contract was used to solicit proposals for a digital media campaign, resulting in four bids. The selected vendor would lead digital content development and implement a marketing strategy targeting counties, school boards, municipalities, and technology centers across Oklahoma-an effort the Commission cannot undertake alone due to limited expertise and staff capacity. Feedback from agencies that have run statewide initiatives, such as Service Oklahoma, Real ID, and public health campaigns, has been incorporated into planning. The Commission proposes allocating approximately \$150,000 for this effort, with the goal of selecting a vendor by September or October and completing the campaign before year-end.

Question from Chair Meek asking would the persons or entities that would be carrying this out be independent contractors?

Comment by Executive Director Bruce Boone stated yes and they have all done statewide campaigns before.

Question from Commissioner Wilt asked how many bids did you receive?

Comment by Executive Director Bruce Boone noted that they reached out to four vendors based on their strong reputations for conducting statewide campaigns.

**Motion:** Vice Chair Weintraub moved to approve the funding for the political subdivision.

**Second:** Commissioner Wilt

**Roll Call Vote:** Johnson – yes, Wilt – yes, Weintraub – yes, Meek – yes

**Motion Carried**

**8. Consideration, discussion, and possible action on proposed Advisory Opinion Request AOR 2025-02 regarding whether security devices and/or security services may be considered as ordinary and necessary officeholder expenses.**

Chair Meek stated that the Commission goes on record to conduct a hearing on Advisory Opinion Request 2025-02, request from Senators Lonnie Paxton and Julie Kirt, and Representatives Kyle Hilbert and Cyndi Munson, pursuant to Okla. Const. art XXIX, § 5, and Okla. Ethics Rule 1.7.

Chair Meek states the Commissioners will now receive public comment, and asked if we have anyone present today that would like to present oral arguments, data or views on the proposed advisory opinion? Please announce your name, your office/company, position and please limit your presentation to 5 minutes.

Glenn Coffee, Senior Legal Advisor for the Senate, spoke on behalf of Senator Paxton and other legislators. He praised General Counsel Kerr's team for well-drafted language, noted the measure is an appropriate response to recent events in Minnesota, and thanked the Commission for its quick work.

Chair Meek: Consideration, comments and discussion by the Commissioners and staff regarding the draft Advisory Opinion in response to the Opinion Request No. 2025-02.

General Counsel Kerr read a public comment received regarding the possibility of bodyguard or in-person security, which is not addressed in the Advisory Opinion.

Executive Director Bruce Boone explained that an advisory opinion is intended to clarify existing rules, but more detailed changes would require a rule change.

Comment by Chair Meek agreed that this could be addressed at a later time.

**Motion:** Commissioner Johnson moved to adopt Advisory Opinion Request No. 2025-02.

**Second:** Vice Chair Weintraub

**Roll Call Vote:** Wilt - yes, Weintraub - yes, Johnson - yes, Meek -yes

**Motion Carried**

- 9. Proposed Executive Session.** Consideration, discussion, and possible action to enter Executive Session, as authorized by 25 O.S. 2021, § 307 (B)(1,4, & 7), for the purpose of having confidential communications between the Commission and its counsel, regarding i-v below about pending investigations, claims, or actions; and to discuss matters for which disclosure would violate confidentiality under Ethics Rules 6.5 and 6.9.

- i. Case No. 2022-25 alleging violations of Campaign Finance Ethics Rules 2; *State of Oklahoma ex rel. Oklahoma Ethics Commission v. Pittman*, Oklahoma County District Court, Case No. CJ-2025-\_\_\_\_\_.
- ii. Case No. 2024-38 alleging violations of Ethics Rule 2, Campaign Finance.
- iii. Case No. 2025-13 alleging violations of Ethics Rule 2, Campaign Finance.
- iv. Case No. 2024-29 alleging violations of Ethics Rule 2, Campaign Finance.
- v. Complaint Numbers:
  - C-25-12
  - C-25-14
  - C-25-15
  - C-25-16

**Statement by Attorney:** The information to be discussed in Executive Session 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 confidentially requirements under Ethics Rules 6.5 and 6.9.

vi. **Action to enter Executive Session.**

**Motion:** Commissioner Wilt moved to enter closed, executive session in room G-3 of the State Capitol Building to discuss the matters listed for agenda item 9.

**Second:** Commissioner Johnson

**Roll Call Vote:** Weintraub – yes, Johnson – yes, Wilt – yes, Meek – yes

**Motion Carried to go into Executive/Close session at 11:45 am.**

vii. **Action to Exit Executive Session.**

**Motion:** Vice Chair Weintraub moved to return to Open Session at 1:19 pm.

**Second:** Commissioner Wilt

**Roll Call Vote:** Johnson – yes, Wilt – yes, Weintraub – yes, Meek – yes

**Motion Carried.**

vii. Possible action on the numbered matters discussed above in Executive Session. *Prior to taking action, the Commissioners may consider, discuss, and act 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. Margaret Kerr, General Counsel.*

**Motion:** Vice Chair Weintraub moved pursuant to Rule 6.7, to open a formal investigation into **Complaint C-25-12**, based on a reasonable cause to believe that one or more violations of Ethics Rules has occurred.

**Second:** Commissioner Wilt

**Roll Call Vote:** Johnson – yes, Wilt – yes, Weintraub – yes, Meek – yes

**Motion Carried.**

**Motion:** Commissioner Wilt moved pursuant to Rule 6.7, to open a formal investigation into **Complaint C-25-14**, based on a reasonable cause to believe that one or more violations of Ethics Rules has occurred.

**Second:** Commissioner Johnson

**Roll Call Vote:** Weintraub – yes, Johnson – yes, Wilt – yes, Meek – yes

**Motion Carried.**

**Motion:** Commissioner Wilt moved pursuant to Rule 6.7, to open a formal investigation into **Complaint C-25-15**, based on a reasonable cause to believe that one or more violations of Ethics Rules has occurred.

**Second:** Commissioner Johnson

**Roll Call Vote:** Weintraub – yes, Johnson – yes, Wilt – yes, Meek – yes

**Motion Carried.**

**Statement by Chair Meek:** Chair Meek, the Commission will not be taking any action today on the following cases and/or complaints that were discussed in Executive Session: Case No. 2022-25, Case No. 2025-13, Case No. 2024-38, Case No. 2024-29, and C-25-16.

14. **Adjournment. Chair Meek**

**Motion:** Commissioner Wilt moved to adjourn the meeting.

**Second:** Commissioner Weintraub

**Roll Call Vote:** Johnson – yes, Weintraub – yes, Wilt – yes, Meek – yes,

**Motion Carried.**

**Meeting ended at 1:26 pm.**

  
LEE ANNE BRUCE BOONE, Executive Director

Approved on behalf of the Commission:

  
JUSTIN MEEK, Chair